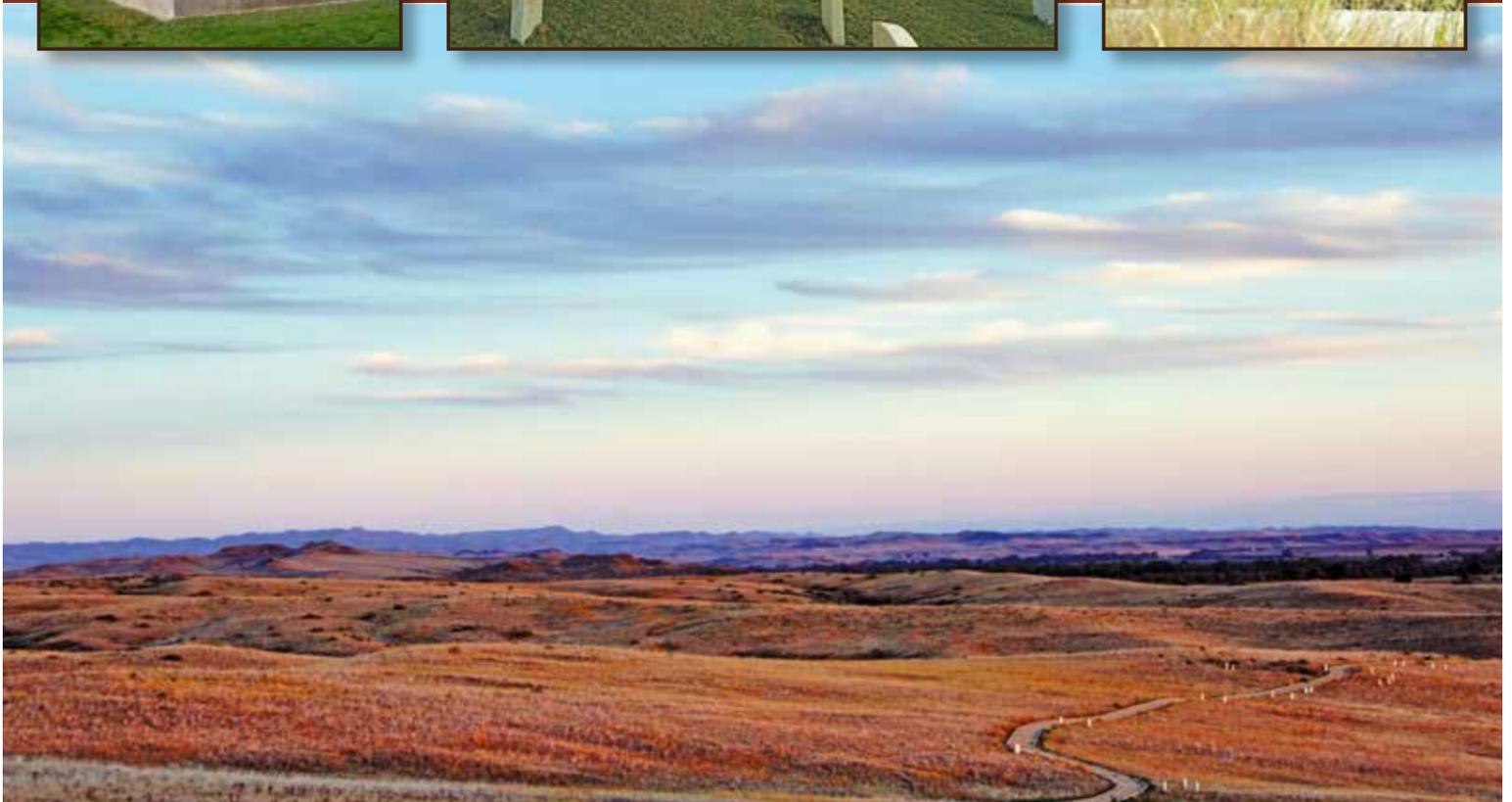




Little Bighorn Battlefield National Monument

General Management Plan Amendment / Environmental Assessment

MONTANA | NOVEMBER 2017



**LITTLE BIGHORN BATTLEFIELD NATIONAL MONUMENT
GENERAL MANAGEMENT PLAN AMENDMENT / ENVIRONMENTAL
ASSESSMENT**

BIG HORN COUNTY, MONTANA

NOVEMBER 2017

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LITTLE BIGHORN BATTLEFIELD NATIONAL MONUMENT GENERAL MANAGEMENT PLAN AMENDMENT / ENVIRONMENTAL ASSESSMENT

SUMMARY

The National Park Service proposes to enhance visitor access, visitor services, and resource protection at Little Bighorn Battlefield National Monument by replacing the existing visitor center with a new visitor center and by returning at minimum priority museum objects, if not all museum collections, to the park or vicinity through the provision of an appropriate curatorial space.

On a busy summer day, the park hosts numerous interpretive presentations with 100 to 200 individuals per presentation in attendance. Currently, the only place to host interpretive presentations is a patio beneath a fiberglass overhang outside of the observation room of the existing visitor center. Park visitors are exposed to the heat, cold, wind, rain, lightning, and noise from visitors' conversations, loud vehicular traffic, and associated air pollution. Conditions during peak visitation can substantially diminish visitor experience and may increase health risks during peak summer temperatures. A new facility would reduce these risks and provide an improved visitor experience.

The park's museum and archival collections in storage were removed from the park in 2011 and are now housed at the National Park Service Western Archeological and Conservation Center in Tucson, Arizona. This move was necessitated by deteriorating conditions in the park's existing collections space that posed the risk of damage and loss of much of the park's world-class collection. While this action was necessary, removal of the collections has strained relations with the park's affiliated tribes and other stakeholders and limits the park's ability to provide exhibits and research materials for the public.

This General Management Plan Amendment and Environmental Assessment examines in detail two alternatives to address these issues: (1) rehabilitate the existing visitor and collections facility; and (2) build a new visitor center within the current footprint of the existing visitor center and return at minimum priority museum objects, if not all museum collections, to the park or vicinity through the provision of an appropriate curatorial space.

Public Comment: If you wish to comment on the General Management Plan Amendment and Environmental Assessment you may mail or hand deliver comments as directed in the following section or post comments online at <http://parkplanning.nps.gov/LIBI>. All comments must be postmarked, transmitted, or logged no later than 45 days after the plan is released for public comment. This deadline will be posted at <http://parkplanning.nps.gov/LIBI>. Before including your address, telephone number, e-mail address, or other personal identifying information in your comment, be aware that your entire comment—including your personal identifying information—may be made publicly available. All submissions from organizations, businesses, and individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

After the comment period ends, the National Park Service planning team will evaluate all input received and incorporate any required changes into the document. If no significant environmental impacts are identified and no major changes are made in the alternatives, then a finding of no significant impact can be prepared for approval by the National Park Service Intermountain Regional Director. If significant environmental impacts are identified, then a decision may be made to switch

to the preparation of an environmental impact statement for the proposal and publication of a notice of intent to prepare an environmental impact statement in the Federal Register.

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Introduction



CHAPTER 1: INTRODUCTION

Park planning is a decision-making process, and general management planning is the broadest level of decision making for parks. General management plans (GMPs) are required for all units of the national park system and are intended to establish the overall future management direction of a national park system unit. General management planning focuses on what resource conditions and visitor experiences should be achieved and maintained (desired future conditions) throughout a park unit. General management plans look years into the future and consider the park holistically in its full ecological and cultural context and as part of a surrounding region. This GMP amendment revises part of the general management plan for Little Bighorn Battlefield National Monument.

PURPOSE AND NEED FOR THE GMP AMENDMENT

The purpose of this GMP amendment is to provide management guidance for the demolition and reconstruction of the park's visitor center and the development of a new collections space. These changes would improve interpretive and educational programming, return much of the collection to the park or vicinity by providing a state-of-the-art collections storage facility, and honor the longstanding trust relationship between the National Park Service and the tribes historically associated with the site. Another purpose of the plan is to provide better access to the collections and the information in the archives to the tribes and other stakeholders.

The National Park Service recognizes there are issues with the visitor center and the museum collections. Completion of the proposed project would solve a number of immediate issues related to visitor experience and protection of the artifacts in the museum collection. Currently, park visitors assemble outside the visitor center beneath a fiberglass overhang attached to the observation room. Although the overhang is noisy and leaks after rain showers, it does offer limited shelter and shade on hot sunny days. Visitors must endure high winds and other weather elements along with noise and air pollution associated with the main park road less than 65–70 feet from this location. During the summer season, as many as 200 visitors try to crowd into this small space to observe one of up to thirteen daily interpretive presentations.

The observation room has large, single-pane windows that allow for the transfer of heat and cold, and it is impossible to maintain a stable temperature in this room. Although the doors between the observation room and the museum exhibit room are often closed, temperature fluctuations have an undesirable effect on objects in the museum exhibit area.

The park's 2012 Museum Management Plan recognized multiple concerns related to the park's museum collections, including serious space, environmental, and fire protection deficiencies in the curatorial storage and exhibit areas of the visitor center; collections storage and treatment concerns; and the absence of planning and other documentation necessary for the care, preservation, and interpretation of the museum and archival collections. The assessment recommended a funding request to rehabilitate the current facility or construct a new facility to house the monument's valuable museum and archival collections. It also recommended funding for conservation treatments, exhibit improvements, new appraisals, basic photographs of objects and improved descriptive documentation, and development of other planning documents (NPS 2012). Consistent with earlier assessments (NPS 2005b), the plan recommended temporary relocation of the collections until suitable facilities were available.

The park's museum collections were moved to the NPS Western Archeological and Conservation Center in Tucson, Arizona, in 2011 to address damage to the artifacts because of overcrowding in an inadequate space, the lack of environmental controls, and the lack of a fire suppression system.

The flood damage that occurred during the 2011 flood event underscored the structural deficiencies of the visitor center. The Tucson facility is a state-of-the-art museum storage facility managed by professional curatorial, conservation, and archival staff. Intensive efforts to improve the condition of objects through storage improvements and conservation treatment are ongoing to prepare the collection for return to the park or vicinity. However, moving the collections to Tucson caused and continues to cause substantial consternation among the tribes affiliated with the site and other stakeholders. The National Park Service has committed to returning the collection to the national monument.

The park's 2015 foundation document identified the need for this GMP amendment as a high priority and recognized facility planning for return of the museum collection as a key issue facing the park (NPS 2015a).

This environmental assessment was prepared in compliance with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations, 40 CFR Parts 1500-1508 and NPS Director's Order (DO) 12, and the NPS *NEPA Handbook* (NPS 2015b).

SCOPE OF THE GENERAL MANAGEMENT PLAN AMENDMENT / ENVIRONMENTAL ASSESSMENT

Planning Issues and Concerns Addressed In This Plan

Protection of the Museum Collections. Museum collections management continues to be recognized as one of the monument's top issues. The museum collections were previously stored in the basement of the visitor center. By 2011, the condition of the visitor center had degraded to the point that the internationally significant museum collections were not adequately protected from fire and water infiltration, and professional museum environmental control standards were not being met.

In 2011, NPS staff conducted extensive outreach with the public, stakeholders, and associated tribes regarding the monument's pressing management issues, including inadequate and insufficient museum collections storage. The NPS Museum Services Program subsequently prepared recommendations defining facility requirements and assessed options for providing temporary collections storage. After considerable analysis, the NPS Museum Services Program recommended the NPS Western Archeological and Conservation Center in Tucson, Arizona, as the most appropriate facility for temporary storage. Natural history collections were relocated to Yellowstone National Park. Some museum items remain on exhibit at the visitor center.

The decision to temporarily relocate the collections to the NPS Western Archeological and Conservation Center was strongly opposed by many affiliated tribal members who felt the move would disconnect their attachment to items of cultural importance associated with the battlefield site. Tribal governments and individuals, as well as other stakeholders, continue to emphasize the importance of returning the museum collections from off-site locations to the park or vicinity. Restoring the trust relationship is essential to future park management and cooperation and consultation with the tribes and other stakeholders.

At present, collection condition surveys have been completed for all collection items, and conservation treatment / stabilization of the archeology, ethnology, history, and archival materials continues as a priority. The need for appropriate storage to accommodate the anticipated future expansion of collections because of donations from scholars, researchers, and Custer history enthusiasts remains a critical issue. The National Park Service is committed to returning the

collections to the monument and providing secure on-site curatorial storage that meets approved standards and guidelines for museum collections management.

Providing for Quality Visitor Experience. The visitor center is inadequate for both current and projected visitation levels. During peak visitation periods, a substantial number of visitors do not have the opportunity to see the park film because of overcrowding. Interpretive programs on the patio are frequently over-capacity, which results in large numbers of visitors being exposed to the sun and the elements. These limitations combine to contribute to a measurably diminished visitor experience because of the inadequacy of the visitor center.

The museum exhibits and collections storage and work areas need modification or replacement to conform to NPS policies and museum best practices and standards. This poses substantial challenges in the development of new exhibits, research, and interpretive programs, which in turn affects visitor understanding and appreciation of the story and significance of the battle. Challenging exhibit rotation needs and new exhibit design also present ongoing issues.

Identification of Impact Topics

An important part of planning is seeking to understand the consequences of making one decision over another. To this end, NPS plans are typically accompanied by an environmental compliance document. Environmental assessments, such as this document, identify the anticipated impacts of possible actions on resources and on park visitors and neighbors. Impacts are organized by topic, such as visitor experience or vegetation. Impact topics serve to focus on the environmental analysis and to ensure the relevance of impact evaluation. Impact topics for this GMP amendment and environmental assessment were identified based on federal laws and other legal requirements, Council of Environmental (CEQ) guidelines, NPS *Management Policies 2006* (NPS 2006), staff subject-matter expertise, and issues and concerns expressed by the public and other agencies early in the planning process.

The interdisciplinary planning team conducted a preliminary analysis to determine the anticipated context, duration, and intensity of effects on the human environment from implementing the alternatives. The impact topics carried forward for analysis were determined to be important to future park management, resource protection, and visitor experience, by the National Park Service and park stakeholders.

Impact Topics Retained for Further Analysis

The following topics are carried forward for further analysis in the environmental assessment:

Museum Collections. The museum collections include archeology, ethnology, history, and art collections, natural resource specimens, and archives. This impact topic covers both the physical condition of the collection and the ability of researchers to access and use the collection. The world-class museum collections are one of the significant resources of the park and are important to the tribes, Custer history enthusiasts, and researchers. Any actions that affect the museum collections would be of concern. Therefore, this topic was retained for analysis.

Visitor Use and Experience. The actions described in the NPS preferred alternative would result in the construction of a new visitor center. Both the construction and operation of the new visitor center would affect the visitor experience. Thus, this impact topic was retained.

Impact Topics Dismissed from Further Analysis

Vegetation and Soils. The construction activities associated with this project would occur almost entirely within the footprints of the existing visitor center and administrative building.

Rehabilitation of the existing building (under alternative A) would occur within the footprint of the existing visitor center and would have a very small impact to soils and vegetation in these areas. Under the NPS preferred alternative, the new visitor center would be rebuilt within the footprint of the existing visitor center and would be approximately the same size as the existing visitor center building. The collections facility may be incorporated into the new visitor center or provided adjacent to or annexed to the existing administrative building. In the latter option, the small-scale development of the new collections facility would be located in the administrative area, occurring within approximately 4,200 square feet of previously disturbed area next to the administrative building. New construction activities relating to this project, including materials storage and the use of heavy equipment for demolition and earthmoving, would have a small effect on soils and vegetation, but these effects would be temporary and would cease once construction is completed. Any impacts to vegetation would be mitigated through revegetation. Therefore, this topic was dismissed from further consideration in this environmental assessment.

Archeological Resources. The Little Bighorn Battlefield can be broadly viewed as an archeological district having the potential to yield further important information corroborating or supplementing written accounts and oral histories regarding the events associated with the Battle of the Little Bighorn. Archeological investigations have uncovered valuable material evidence documenting the movements of cavalry troops and American Indian warriors throughout the battlefield landscape and the locations of soldier burials. Other important findings have provided new insights and lines of inquiry into the enigmatic story of the battle (NPS 2010).

Artifacts associated with the Battle of the Little Bighorn were collected by artifact hunters in the immediate aftermath of the battle, and artifact collecting continued prior to establishment of the monument, both within the present monument boundaries and across the entire battlefield. Artifact collecting continues on adjacent private lands. NPS historian Jerome Greene compiled data from private collectors and analyzed the distribution of battlefield artifacts (Greene 1973), and his research informed later professional archeological investigations (NPS 2007).

No further baseline data were collected until a 1983 fire burned off the monument's vegetation, facilitating inspection of the ground surface. Subsequent archeological investigation identified battle-related artifacts and several natural features. Volunteers assisted professional archeologists in locating and cataloging numerous exposed surface artifacts including cartridges, bullets, iron arrowheads, personal adornment items, army equipment, firearms parts, buttons and clothing fragments, and fragments of human and horse remains (Fox 1983; NPS 2010).

The area in which construction activities are proposed for the visitor center was heavily disturbed by construction of the existing visitor center in 1951 and administrative building in the 1960s, including excavation and mass grading of the landform. All construction activities would take place within these previously disturbed areas within the existing footprint of the visitor center and the existing footprint and small area immediately adjacent to the administration building. Ongoing monitoring would evaluate the potential for unanticipated impacts during demolition and construction. Therefore, this topic was dismissed from further consideration in this environmental assessment.

Cultural Landscape. A cultural landscape inventory (CLI) was completed for the park in 2010 (NPS 2010). There are two cultural landscapes within or adjacent to the project area—Last Stand Hill and the National Cemetery. Most of the development related to visitor services and

interpretation nearby these landscapes post-date the period of significance and lacks design integrity related to the historic context of the site. Although many of the primary viewsheds remain largely intact, overall visual integrity of the site has been impacted by the intrusion of the existing visitor center on Last Stand Hill, parking lots, vehicles moving along the park Tour Road, and off-site views of development on adjacent and distant lands. Under the NPS preferred alternative, the new visitor center would be rebuilt within the footprint of the existing visitor center within the cultural landscape and would be approximately the same size as the existing visitor center building. The collections facility may be incorporated into the new visitor center or provided adjacent to or annexed to the existing administrative building. In the latter option, the small-scale development of the new collections facility would be located in the administrative area, outside the cultural landscape. In contrast to the existing 1952 cement block visitor center, both the new visitor center and possible collections facility would be designed to blend with the surrounding landscape, thereby reducing visual impacts to the cultural landscapes. Therefore, this topic is dismissed from further analysis in this document.

Environmental Justice. According to the Council on Environmental Quality, environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (CEQ 1997). Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the adverse environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

As part of this plan, park staff consulted with the tribes affiliated with the site (full list of affiliated tribes available in Chapter 4, “Involvement of Other Federal and State Agencies, Regional and Local Governments, and Partner Organizations”). All alternatives considered in the GMP amendment give attention to potential effects on traditionally associated peoples. Detailed discussions with all special status parties on expectations and needs for accommodation will help ensure that cultural values and significant activities that have played a role in the history of the national monument are recognized and valued by the park and by future visitors. No adverse effects related to socioeconomic conditions, public health, or environmental impacts were identified that disproportionately affect traditionally associated peoples. Therefore, the topic of environmental justice is dismissed from further consideration in this environmental assessment.

Indian Trust Resources. Indian trust assets are owned by American Indians but held in trust by the United States. Secretarial Order 3175, “Departmental Responsibilities for Indian Trust Resources,” requires that any anticipated impacts to Indian trust resources due to a proposed project or action by agencies within the Department of the Interior be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes. The lands within the monument boundaries are not held in trust by the Secretary of the Interior for the benefit of Indians. For the preferred action alternative, the proposed improvements to the visitor center and the construction of the new collections facility are not within Indian trust resources, nor would there be any impact to identified sacred sites. Therefore, this topic was dismissed from further consideration in this environmental assessment.

RELATIONSHIP OF OTHER PLANNING EFFORTS TO THIS GENERAL MANAGEMENT PLAN AMENDMENT

General Management Plan (1986, updated in 1995)

The general management plan provides guidelines and strategies for the management and use of the monument. The plan provides direction for resource protection, land use, visitor use and interpretation, visitor use/developments, and park operations. The general management plan identifies deficiencies in the visitor center, including concerns with visitor experiences, exhibits, and operation of the building, and with protection of the museum collections. Among other actions, the plan proposes a new visitor orientation/administration facility at a location on private land in the Garryowen area. The museum collections would be moved to this new building. Please see “Alternatives Considered But Dismissed” for more information about why this alternative is not considered feasible by the National Park Service. This GMP amendment revises the 1986 general management plan regarding the visitor center and the museum collections (NPS 1995).

Museum Management Plan (2012)

The Museum Management Plan provided an assessment of the museum program operations and facilities, identified accomplishments and deficiencies, as well as action items and priorities for improvement. The 2012 plan confirmed earlier assessments that storage and exhibit of museum collections in the visitor center constituted a significant and unacceptably high risk to this highly significant collection because of the lack of a fire suppression system and inadequate environmental and security controls. The plan identified two interim storage alternatives, recommending that the park select from among the two options: improvement of the existing museum space and storing a portion of the collections in an off-site NPS facility; or relocating the entire cultural collection to an off-site NPS facility until suitable facilities were available (NPS 2012). In 2011, the park partially implemented the first option, transferring the majority of the collection to the NPS Western Archeological Conservation Center (WACC), while retaining approximately half of the ethnographic object collection (about sixty objects) at the park. The alternatives analyzed in this GMP amendment are consistent with the recommendations on selection of an interim storage option called for in the 2012 plan.

Environmental Assessment / Assessment of Effect Rehabilitation Tour Road (2005)

This plan called for the widening of the Tour Road to 24 feet and the rehabilitation, restoration, resurfacing, and reconstruction of about 6.1 miles of the road. The plan also called for reconstruction of the visitor center and Reno-Benteen parking areas to provide increased parking capacity and improved traffic flow. To date, none of these actions have been implemented, though they are still anticipated. This GMP amendment would not affect the actions in the 2005 environmental assessment (NPS 2005a).

NEXT STEPS

After distribution of this General Management Plan Amendment / Environmental Assessment, there will be a 45-day public review. Following an assessment of public comments, if no significant environmental impacts are identified and compliance with Section 106 of the National Historic Preservation Act is completed, then it is anticipated that a finding of no significant impact can be prepared for review and approval by the NPS Intermountain Regional Director. If significant impacts are identified, the National Park Service would continue with the preparation of an environmental impact statement.

Implementing the GMP Plan Amendment

Should this plan be approved, it does not guarantee that funding and staffing needed to implement the plan would be forthcoming. Implementation of the approved plan would depend on future funding and could also be affected by factors such as changes in NPS staffing and visitor use patterns. Full implementation could be years in the future. Once the plan has been approved, more detailed design will be needed before certain components of the plan could be carried out.

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**Alternatives Including the NPS
Preferred Alternative**



CHAPTER 2: ALTERNATIVES INCLUDING THE NPS PREFERRED ALTERNATIVE

INTRODUCTION

This chapter describes two alternatives for addressing management issues at Little Bighorn Battlefield National Monument. These alternatives present different ways to manage resources and visitor use, improve management of the park, bring the museum collections facility into compliance with professional and NPS guidelines, and embody the range of what NPS staff determined feasible to improve visitor use and experience at Little Bighorn. Alternative A, the no-action alternative, describes a continuation of current management direction and provides a baseline for comparison to the action alternative. The action alternative is alternative B.

After reviewing public comments on the preliminary range of alternatives shared with the public in the draft alternatives newsletter, the planning team proceeded to refine the alternatives. A viable agency preferred alternative was identified to incorporate resource protection and visitor opportunities.

ALTERNATIVES CONSIDERED

Alternative A (No-Action Alternative)

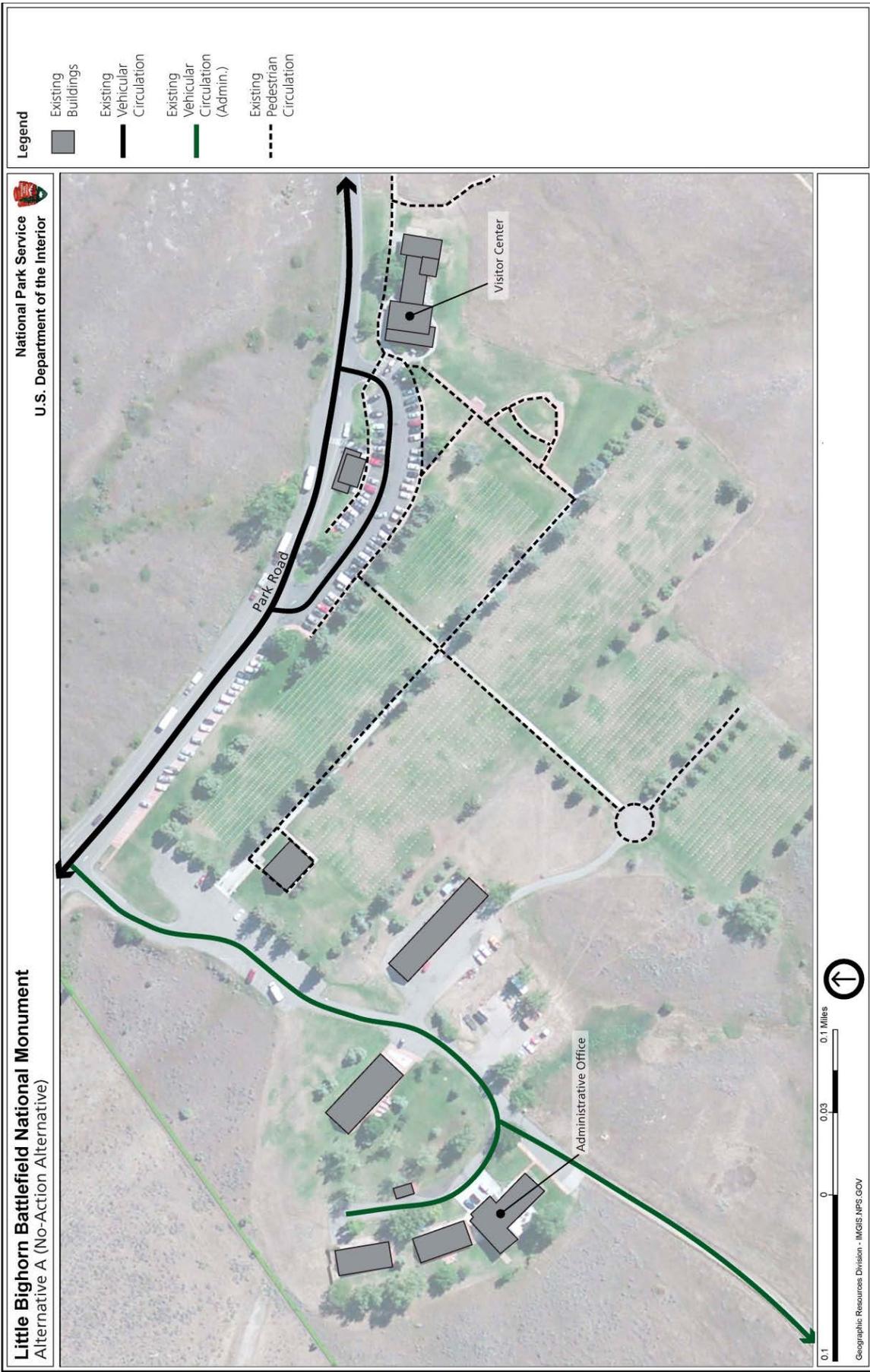
Concept: Maintain the existing visitor center in its original location and make interior improvements (map 1).

Alternative A represents a continuation of current management practices in the park. Under alternative A, the National Park Service would continue the present management direction for Little Bighorn Battlefield National Monument, guided by existing law and policy, the 1986 general management plan, and the 1995 GMP amendment. Improvements would be made to the existing building within the current building footprint. These improvements would include modifying the observation room for interpretive programming; improving building access in compliance with the Architectural Barriers Act; and implementing new exhibits as well as a scheduled rotation of exhibit items. The curator's work space/office and the museum records would continue to be in the basement of the visitor center. This alternative would not include important museum collections environmental control and security, nor would it include the installation of a fire suppression system.

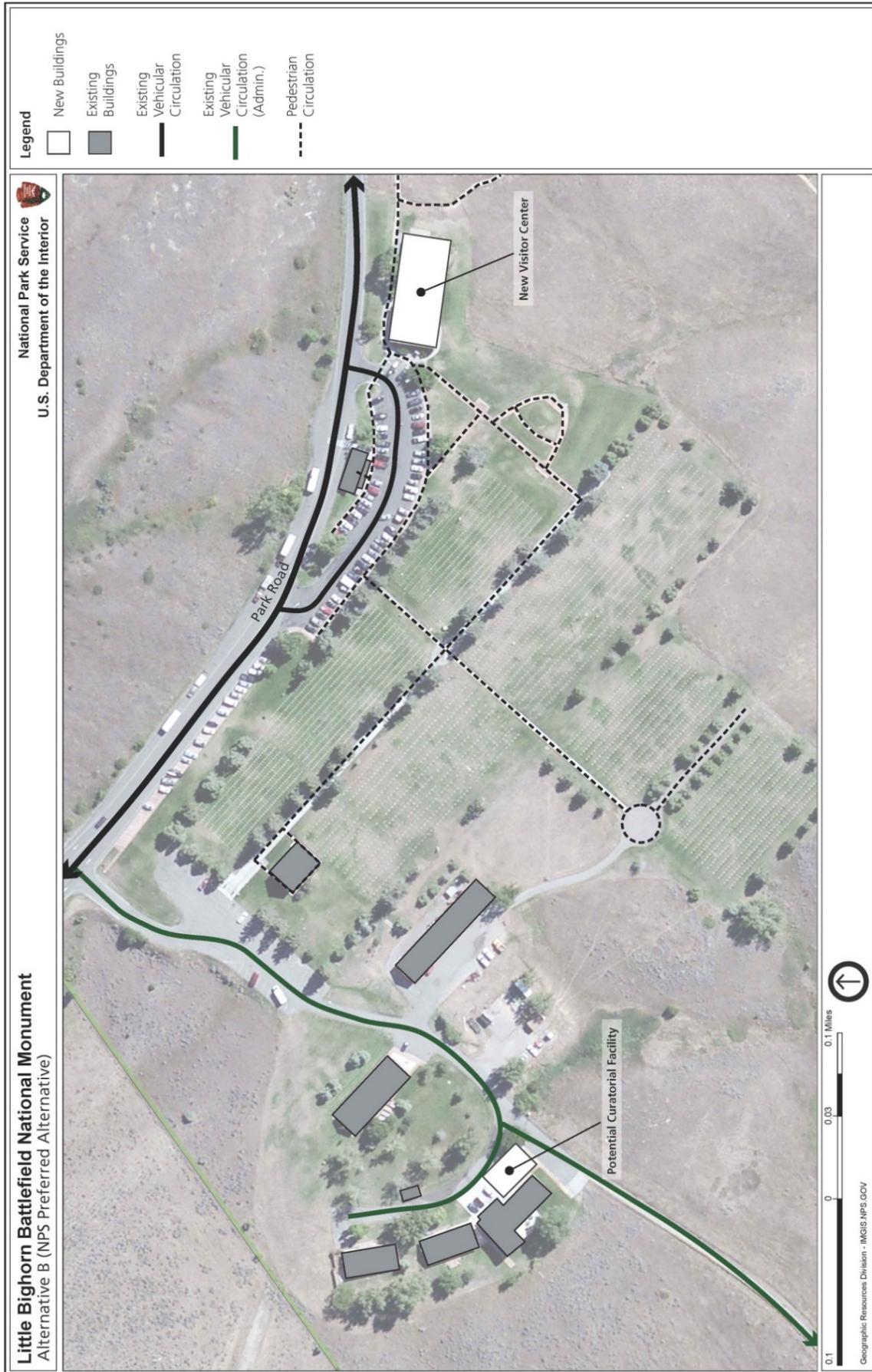
Alternative B (NPS Preferred Alternative)

Concept: 1) Build a new visitor center in the current location of the existing visitor center, and 2) Return at minimum priority museum objects, if not all museum collections, to the park or vicinity through the provision of an appropriate curatorial space (map 2).

To address the inefficiencies and structural issues of the current visitor center building, under alternative B the National Park Service would build a new approximately 10,600-square-foot visitor center within the footprint of the existing visitor center. The physical size and mass of the building would be approximately the same as the existing visitor center, but the interior and exterior spaces would be adaptively reused to maximize priority functions. Rebuilding within the footprint of the existing visitor center would perpetuate a key component of the quality of the visitor experience, enabling visitors to have an "entry experience," which includes seeing key elements of the battlefield from the visitor center's windows and patios and creating a place-based context for their



MAP 1. LITTLE BIGHORN BATTLEFIELD NATIONAL MONUMENT - ALTERNATIVE A (NO-ACTION)



MAP 2. LITTLE BIGHORN BATTLEFIELD NATIONAL MONUMENT – ALTERNATIVE B (NPS PREFERRED)

visit. The new visitor center would have improved visitor flow and access to exhibits, and provide a better space for interpretive and educational programs. The new visitor center would be designed to blend with the surrounding landscape, thereby minimizing or reducing visual impacts on the battlefield and surrounding cultural landscape. Improved environmental control and security, as well as the installation of a fire suppression system, would help protect museum collections on exhibit in the visitor center and/or stored in a potential curatorial space in the visitor center. Please see the section below related to the flexibility in implementation of the NPS preferred alternative for more information.

Prior to demolishing and rebuilding the visitor center, an interim remodel of the visitor center would take place to address more immediate facility and visitor experience needs. This remodel would include demolition and rehabilitation of the interior of the existing visitor center and provision of updated interim exhibits, including removal and relocation of existing museum collections objects and new exhibit fabrication and installation.

In this alternative, the National Park Service would return at minimum priority museum objects such as the remainder of the ethnographic collections now at NPS Western Archeological Conservation Center, if not the entire collection to the park or vicinity, through the provision of an appropriate curatorial space. Several options may be pursued for implementing this action. The options described do not preclude any other approaches that also achieve the overarching vision for the NPS preferred alternative that may be developed in the future, providing that any adverse environmental impacts associated with those options are similar to or less than those described in this environmental assessment:

- The new visitor center could be designed to include appropriate curatorial space for some, if not all, museum collections. This option could be considered if a separate collections facility does not exist yet when the visitor center rebuild would occur. This option would include the design of a smaller museum curatorial space within the new visitor center to enable the return of priority museum objects to the park. This curatorial space would likely only be used for object storage with work space likely delegated to the lower level of the visitor center. If physical space does not enable the return of the archival collections to the park, efforts to digitize those items would continue. Digitized collections would be made available for access by researchers and the general public, as appropriate. The park could explore opportunities to use suitable partner repositories for the archival collection and providing digital interfaces for access to the collection.
- A collections facility could be built adjacent to or annexed to the existing administrative building. The adjacent or annexed collections facility would be approximately 7,000 square feet, but would likely not affect more than approximately 4,200 square feet of ground disturbance adjacent to the existing administrative building.

Installation of state-of-the-art environmental controls, fire suppression and security system in both the new visitor center and collections facility (if separate from visitor center) would enhance protection of artifacts in the collection. Having the museum collections in a separate on-site facility from the visitor center would present minimal challenges for rotating museum collections through the museum exhibits. Please see the section below related to the flexibility in implementation of the NPS preferred alternative for more information.

In total, approximately 17,600 square feet of space is estimated to meet all visitor center and curatorial needs. Of the 17,600 square feet, approximately 4,200 square feet would be new ground

disturbance and would be located adjacent to the existing footprint of the administrative building if that option is pursued.

Considerations for Implementation of the NPS Preferred Alternative. The National Park Service recognizes that this is a long-term plan, and, in the framework of the plan, park managers may take incremental steps to reach park management goals and objectives. Alternative B (the NPS preferred alternative) describes the overarching vision for implementation of the plan. However, approval of this plan does not guarantee funds and staff for implementing the preferred alternative. Additionally, there is no guarantee that all the components of the plan would be implemented. The implementation of the approved plan could also be affected by other factors such as changes in visitor use, additional data or regulatory compliance requirements, competing national park system priorities, and unforeseen environmental changes.

For these reasons, this plan includes flexibility in the implementation of the NPS preferred alternative. Several potential options for implementing the preferred alternative have been included in the text for the alternative. The options described do not preclude any other approaches that also achieve the overarching vision for the NPS preferred alternative that may be developed in the future, providing that any adverse environmental impacts associated with those options are similar to or less than those described in this environmental assessment. Additionally, the park staff would actively seek partnership opportunities and alternative sources of funding for implementation of the NPS preferred alternative.

MITIGATION MEASURES

Congress charged the National Park Service with managing the lands under federal government stewardship “in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations” (NPS Organic Act, 16 USC 1). As a result, NPS staff routinely evaluate and implement mitigation measures whenever conditions occur that could adversely affect the sustainability of NPS resources.

Mitigation measures are the practicable and appropriate methods that would be used under the action alternatives to avoid and/or minimize harm to park natural and cultural resources, visitors, and the visitor experience.

The following mitigation measures have been developed to minimize the degree and/or severity of adverse effects and would be implemented, as needed, during construction activities proposed in the action alternative:

- Design for a new structure in close proximity to historic properties would be well executed and sensitive to the cultural and natural environment. The National Park Service would identify the character-defining features of any such properties in its design planning process and use a project-specific design recognizing the features that qualify any historic properties present as eligible for listing in the National Register of Historic Places. As appropriate, new construction would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Any construction activity with the potential to affect historic properties would be contingent upon completion of obligations under Section 106 of the National Historic Preservation Act, in consultation with the Crow Tribal Historic Preservation Office and other identified consulting parties.
- Archeological monitoring would be conducted throughout the demolition and construction periods.

- Conduct construction work to avoid peak visitor use times (i.e., weekends, holidays) to the extent practicable to minimize inconveniences to visitors. Ranger talks would be conducted in an area away from construction activities. Park information would also be provided through cell phone tours and access to websites. The temporary facility would include restrooms, drinking water, and other visitor services.
- To minimize the amount of ground disturbance, staging and stockpiling areas would be in already disturbed areas such as the Superintendent's Lodge parking lot. All staging and stockpiling areas would be returned to pre-construction conditions following construction.
- All material source / waste areas would be located outside the monument. Consistent with NPS policy, potential material source / waste areas would be subject to the requirements of Section 106 of the National Historic Preservation Act. All demolition debris, including visible concrete and metal pieces, would be immediately hauled from the monument to an appropriate disposal location. All tools, equipment, barricades, signs, surplus materials, and rubbish would be removed from the project work areas upon project completion. Any asphalt surfaces damaged because of work on the project would be repaired to original condition.
- Contractor(s) would be required to maintain strict garbage control so that scavenger animals would not be attracted to the project areas. No food scraps would be discarded or fed to wildlife.
- Workers would be informed of the penalties for illegally collecting artifacts or intentionally damaging archeological or historic property. Workers would be informed of the correct notification procedures in the event that previously unknown resources were uncovered during construction.
- If cultural materials were uncovered during construction, work in the immediate area would be stopped, the site secured, and park staff would consult according to 36 CFR 800.13.
- An inadvertent discovery plan would be developed prior to construction work. If human remains were uncovered during construction, the park superintendent would be contacted immediately and work in the vicinity would be stopped. Human remains found in this area would more likely be a member of the Seventh Cavalry. Over the years, the army buried and reburied several bodies that had eroded or washed from their graves. The recovery of those remains would be conducted pursuant under the guidelines for inadvertent discovery protocols under the Archeological Resources Protection Act (1979).
- The American Indians who died on the battlefield were removed by tribal members for proper burial. However, the National Park Service recognizes the possibility that American Indian remains still could be found on the battlefield. In such a case, the National Park Service, in compliance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), would notify and consult representatives of American Indian tribes likely to be culturally affiliated for the proper treatment of human remains, funerary, and sacred objects should these be discovered during the project. Work could resume only after an appropriate mitigation strategy was developed in consultation with Tribal Historic Preservation Offices, as appropriate, and executed.
- The area around the northeastern side of the visitor center was excavated during the original construction of the Little Bighorn Battlefield visitor center, which was completed in 1952. The soils and vegetation are already impacted to a degree by various human activities. The NPS preferred alternative would take advantage of building on a previously disturbed area. Soils within project construction areas would be compacted and trampled by the presence of construction equipment and workers. Soils would be susceptible to

erosion until revegetation takes place. Vegetation impacts and potential compaction and erosion of bare soils would be minimized by conserving topsoil in windrows. The use of conserved topsoil would help preserve microorganisms and seeds of native plants. The topsoil would be re-spread in as near the original location as possible and supplemented with scarification, mulching, seeding, and/or planting with species native to the immediate area. This would reduce construction scars and erosion.

- Disturbed areas would be returned to lawn or native prairie conditions, as appropriate.
- Ground surface treatment would include grading to natural contours, as well as roughing / scarification and mulching to promote natural seeding.
- Erosion and sediment control measures would be required. Disturbed sites within the construction areas would be returned to their preconstruction contours as much as possible. Areas disturbed by construction would be revegetated to facilitate soil stability, help reduce runoff, channelization, and erosion, and to help restore the area to natural conditions or lawns, as appropriate.
- Best management practices for drainage and sediment control would be implemented to prevent or reduce nonpoint source pollution and minimize soil loss and sedimentation in drainage areas and water resources. Use of best management practices in the project areas for drainage area protection would include all or some of the following actions, depending on site-specific requirements:
 - Keep disturbed areas as small as practical to minimize exposed soil and the potential for erosion.
 - Conduct regular site inspections during the construction period to ensure that erosion control measures are properly installed and functioning effectively.
 - Store, use, and dispose of chemicals, fuels, and other toxic materials in a proper manner.
- Contractors would coordinate with park staff to minimize disruption to normal park activities and maintain access to park housing. Equipment would not be stored along the roadway overnight without prior approval of park staff. Construction workers and supervisors would be informed about the special sensitivity of park values, regulations, and appropriate housekeeping. To minimize the potential for impacts to park visitors, variations on construction timing would be considered. One option includes conducting the majority of the work in the off-season (winter) or shoulder seasons. Another option includes implementing daily construction activity curfews such as not operating construction equipment between the hours of 7 a.m. to 7 p.m. in summer (May – September). The National Park Service would determine this in consultation with the contractor.
- Construction zones would be identified and fenced with construction tape, snow fencing, or similar material prior to any construction activity. The fencing would define the construction zone and confine activity to the minimum area required for construction. All protection measures would be clearly stated in the construction specifications, and workers would be instructed to avoid conducting activities beyond the construction zone.
- Temporary impacts associated with the visitor center and collections facility construction would occur, such as soil and vegetation disturbance and the possibility of soil erosion. In an effort to avoid introduction of exotic plant species, no hay bales would be used because hay commonly contains seed of undesirable or harmful alien plant species. Therefore, on a case by case basis the following materials may be used for any necessary erosion control dams: rice straw, straws determined by the National Park Service to be weed-free (e.g., Coors barley straw or Arizona winter wheat straw), cereal grain straw that has been fumigated to kill weed seed,

and wood excelsior bales. Standard erosion control measures such as silt fences and/or sand bags would also be used to minimize any potential soil erosion.

- Measures would be implemented to reduce adverse effects of construction on visitor experience. Measures may include, but are not limited to, noise abatement, visual screening, and directional signs so visitors are able to avoid construction activities.
- Information would be made public regarding implementation of projects in public areas well ahead of construction so visitors are aware of the work and can change their plans.
- Facilities, programs, and services of the National Park Service and its partners would be ensured accessible to and usable by all people, including those who are disabled. This policy is based on the commitment to provide access to the widest cross-section of the public and to ensure compliance with the Architectural Barriers Act (42 USC 4151 et seq.) and the Rehabilitation Act (29 USC 701 et seq.).

ALTERNATIVES CONSIDERED BUT DISMISSED

Lease New Visitor Center and Museum Storage Facility in Garryowen Area

This location was recommended in the 1995 update to the park's 1986 general management plan. Under this alternative, the National Park Service would lease a newly built facility that would be constructed on private land by an undetermined third-party in Garryowen, Montana. The lease would be managed through the General Services Administration. The annual cost of the lease for the property and building would likely be substantial. This alternative would also include potential modifications to the interstate interchange in Garryowen for access to the site and new road and bridge infrastructure to convert the park road to a one-way loop from south to north. These modifications to the circulation would present the story of the battle chronologically to visitors but would be costly (almost \$22 million in 1995 dollars, or almost \$52 million in 2017 dollars when using the typical escalation used for facility projects in the NPS Project Management Information System, not including the facility or any costs to acquire private lands that the new road would traverse). The cost would include a new road, two bridges over the river, and amenities in the Reno-Benteen area. This alternative would require lease agreements and potentially other agreements to address the complexities of constructing and leasing a building on land not owned by the National Park Service. Alternatively, one landowner desires to donate land for this option to the National Park Service, but this would require congressional action because the National Park Service does not have legal authority to accept the donation of noncontiguous lands. As a result, this alternative was eliminated from further consideration because it would require a major change to existing law and policy governing NPS management actions and because it would be unreasonably expensive.

Lease New Visitor Center and Museum Storage Facility in Reno Creek Road Area

This alternative is similar to the above dismissed alternative (Garryowen area) except that a newly constructed road would cross less private land, which could lessen the need for land acquisition and reduce costs. The National Park Service would lease a newly built facility that would be constructed on private or tribal lands on a suitable parcel in the Reno Creek Road area. This lease would be conducted through General Services Administration or the Bureau of Indian Affairs, and annual lease costs for the property and building would likely be substantial. This alternative would also include new road and bridge infrastructure to convert the park road to a one-way loop from south to north. These modifications to the circulation would present the history of the battle chronologically but would be costly. Necessary improvement would include a new road, one bridge over the river, and amenities in the Reno-Benteen area. This alternative would require lease agreements and potentially other agreements to address the complexities of constructing and

leasing a building and road on land not owned by the National Park Service. This alternative was eliminated from further consideration because, like the alternative above, it would require a major change to existing law and policy governing NPS management actions and because it would be unreasonably expensive.

Build New Visitor Center and Museum Storage Facility on Custer Battlefield Preservation Committee Land

Two parcels were considered in this scenario, one non-adjacent parcel as identified in the *General Management and Development Concept Plans* (1986) and another northeast of the current entrance road, immediately adjacent to the park's northeast boundary. The non-adjacent parcel is one of the locations considered in the lease options discussed above for the Garryowen area. The adjacent northeastern parcel is in the process of being donated to the park. Building at this location was eliminated from further consideration because of the 11% grades on the site that far exceed the normal construction threshold of 5%. The development of parking would require extensive cut and fill and some terracing to establish a level surface for construction and provide adequate drainage. New utilities (power, water, and sewer) would be required.

New facilities on this site would require development of an additional leach field within the park boundaries. Development would also require the construction of a new access road. This and other construction activities would pose a disturbance to existing drainage systems. Construction on the site's north-facing slope would increase heating challenges and costs for facilities on site. Construction would also adversely impact the viewshed from Last Stand Hill.

The tract is part of the 1876 battlefield, and construction here would result in adverse effects on the battlefield landscape and associated archaeological resources.

This alternative was eliminated from further consideration because of technical and/or economic infeasibility and because it duplicates other, less environmentally damaging and less expensive alternatives.

Locate Administrative Offices Outside Park

Unless located nearby, such as at the proposed battlefield rest area, this option could create more operational problems than it would resolve, and no suitable facility now exists nearby. Administratively, the park could consider duty-stationing at least one position at another location, such as Bighorn Canyon National Recreation Area headquarters at Fort Smith, Montana, in the future. This alternative was eliminated from further consideration because of technical and economic infeasibility.

Lease Visitor Center and Collections Facility as part of Proposed Montana Department of Transportation "Battlefield Rest Area"

In 2014, the Montana Department of Transportation completed a site evaluation report for a "battlefield rest area project" to develop a site that could accommodate complementary uses between the department, the Crow Tribe, the Federal Highway Administration, and the National Park Service. The purpose of this planning process was to evaluate construction of a new rest area, with provisions for a wastewater system, potable water system, car and truck parking, and a restroom facility. Preliminary site design includes adequate buildable space for a future Crow tribal museum and an NPS visitor center and collections facility. The report narrows down the preliminary alternative sites to one preferred site on Crow tribal land, east of the I-90 / Highway 212 interchange, to the east and northeast of the Custer Battlefield Trading Post (across from the

existing park entrance road). Ceremonial ground-breaking occurred in May 2015; however, the rest area is merely conceptual until the department and the Crow Tribe sign a lease agreement. This alternative would require lease agreements and potentially other agreements to address the complexities of constructing and leasing a building on land not owned by the National Park Service. This lease would be conducted through the General Services Administration or the Bureau of Indian Affairs, and annual lease costs for the property and building would likely be substantial.

The existing park visitor center would be removed and a visitor shade structure and/or plaza for interpretive programs would be provided at this location. The current restrooms, trash receptacles, and parking facilities near the existing visitor center and Custer National Cemetery would remain to provide necessary visitor services.

This alternative was eliminated from further consideration because of technical or economic infeasibility. The park has a compelling need to move forward to address its issues, and this alternative may/may not proceed in the near future.

**Affected Environment and
Environmental Consequences**



CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter describes the existing environment and current condition of those resources that would be affected by implementing the actions considered in this GMP amendment. The rationale for considering or dismissing these and other impact topics is explained in the introduction of chapter 1.

MUSEUM COLLECTIONS

Overview

Little Bighorn Battlefield National Monument's museum collections include archives, archaeology, ethnology, history, art, and biology collections, reflecting multiple facets of the site's significance.

The collection comprises over 192,600 items, over 85% of which are archives (NPS 2016b). Among the collections are personal items that belonged to Custer and were donated by his wife, Elizabeth (Libby) at the time of her death "to the Public Museum or Memorial which may be erected on the battlefield of the Little Bighorn in Montana." The Custer collection includes uniforms, weapons, insignia, miscellaneous military accoutrements, documents, books, photographs, and personal items dating from Custer's early military career to his death in 1876. Ethnology collections primarily include material culture items from the Northern Plains tribes who participated in the Battle of the Little Bighorn. Artifacts include clothing, weapons, horse equipment, bead work, and ceremonial items. A few of the items either belonged to family members of the participants who occupied the nearby Indian Camp during the battle or were retrieved by them after the battle had ended. Other collection items include US Cavalry accoutrements consisting primarily of firearms, military equipment, horse tack, uniforms, insignia, and personal belongings of the military and civilian battle participants (NPS 2007).

The park curator, stationed at the national monument, manages the entire collection from an office in the basement of the existing visitor center, where accession records and uncatalogued and unaccessioned collections are kept. Approximately half of the park's ethnographic object collection (about sixty objects), including fewer than six objects awaiting repatriation, occupy a small adjacent space. Exhibits, which include 128 of the most iconic museum items, occupy a significant portion of the main floor of the visitor center.

Collection Management

The NPS Intermountain Region museum collections facilities strategy identified the monument's collection as the most at risk collection in the region because of the absence of a professional curator and the substandard storage facilities (NPS 2005b). It recommended relocation of the collection to Grant-Kohrs Ranch National Historic Site or Yellowstone National Park for interim storage until a new facility could be constructed. Deficient accession and catalog records were noted, as well as unfulfilled treatment needs and exhibit rotation schedules for fragile items identified by previous collection condition surveys (NPS 2012).

The majority of the park's museum collections were moved to the NPS Western Archeological and Conservation Center in Tucson, Arizona, in 2011 to address damage to the artifacts because of overcrowding in an inadequate space, the lack of environmental controls, and the lack of a fire

suppression system. The flood damage that occurred during the 2011 flood event underscored the structural deficiencies of the visitor center. The Tucson facility is a state-of-the-art museum storage facility managed by professional curatorial, conservation, and archival staff. Intensive efforts to improve the condition of objects through storage improvements and conservation treatment are ongoing to prepare the collection for return to the park or vicinity. However, the move of the collections to Tucson caused substantial consternation among the tribes affiliated with the site and other stakeholders. The National Park Service has committed to returning the collection to the national monument.

Archives

The park archives incorporate nearly 165,000 items (103 linear feet) of material and constitute over 85% of the park's museum collections. The archives include an unparalleled collection of materials and research related to George Armstrong Custer, the Seventh Cavalry, and tribal perspectives on the battle.

The park's resource management records also form a significant component of the archives. The records pertain to park history as well as document archeological investigations through field notes, photographs, slides, videos, and other archival materials. All records associated with the natural history collection also are retained in the archives. Records may include field notes and catalogs, daily journals, drawings, maps, photographs, negatives, slides, sound recordings, raw data sheets, instrument charts, collection inventories, analytical study data, conservation treatment records, and computer documentation and data, as well as any other documents generated through collection and analysis activity. The archives are located at the NPS Western Archeological and Conservation Center in Tucson, Arizona.

Archeology Collections

The archeology collection at Little Bighorn consists of 11,547 items including artifacts recovered as part of the first extensive investigations comparing material evidence from the battlefield and historical accounts. In 1992 and 1996, the archeological collection was returned to the monument from the NPS Midwest Archeological Center in Lincoln, Nebraska, where it had been cataloged and analyzed. The archeological collections are currently housed at the NPS Western Archeological and Conservation Center in Tucson, Arizona.

Art Collections

The art collections at present consist of 126 objects, including notable paintings, sculptures, and American Indian ledger art such as: J.K. Ralston's *Call of the Bugle* and *After the Battle*; the sixteen Martin Pate wayside exhibit paintings depicting the battle; watercolor portraits of American Indian battle participants by artist Howard Bacon, great nephew of Elizabeth Bacon Custer and several prints by famous artists; bronze sculptures including "Indian Victor and Final Moment" by Rogers Aston; and Michael Westergard's "Destiny on the Greasy Grass." A collection of ledger drawings donated by Mary Jane Colter, a noted southwestern architect include drawings Colter received as a child from an uncle who guarded Cheyenne Indian Prisoners detained at Fort Keogh, Montana, in 1877-1878. The drawings depict various daily activities and battle scenes. Another collection of ledger drawings was donated by Thomas B. Marquis, a physician who befriended the Northern Cheyenne during the late 1920's. This group includes drawings by Shoulderblade, Woodenleg, Limpy, and Big Beaver.

Ethnology Collections

Seventeen tribes are historically associated with the park because of their direct involvement in the battle or because the conflict helped bolster Indian pride during the continuous efforts to remove them from their homelands. These are the: Arapaho Tribe of the Wind River Reservation, Wyoming; Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation, Montana; Cheyenne and Arapaho Tribes, Oklahoma (previously listed as the Cheyenne-Arapaho Tribes of Oklahoma); Cheyenne River Sioux Tribe of the Cheyenne River Reservation, South Dakota; Crow Creek Sioux Tribe of the Crow Creek Reservation, South Dakota; Crow Tribe of Montana; Flandreau Santee Sioux Tribe of South Dakota; Lower Brule Sioux Tribe of the Lower Brule Reservation, South Dakota; Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana; Oglala Sioux Tribe (previously listed as the Oglala Sioux Tribe of the Pine Ridge Reservation, South Dakota); Rosebud Sioux Tribe of the Rosebud Indian Reservation, South Dakota; Santee Sioux Nation, Nebraska; Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota; Spirit Lake Tribe, North Dakota; Standing Rock Sioux Tribe of North & South Dakota; Three Affiliated Tribes of the Fort Berthold Reservation, North Dakota; and Yankton Sioux Tribe of South Dakota.

Ethnology collections, which include 142 items, are of particular interest to these tribes. These collections and the information they contain have long been the focus of research; one of the primary challenges for NPS staff is addressing the high demand for information about and use of the collections (NPS 2012). Sixty-nine items are curated at the NPS Western Archeological and Conservation Center in Tucson, Arizona; the remainder are stored at the park awaiting repatriation or are on exhibit. Collections at the park are at risk because of the lack of fire suppression in the facility and inadequate environmental and security controls. Exhibited items also suffer from prolonged exposure and need to be rotated.

History Collections

This collection includes 15,712 documents, letters, manuscripts, historic photographs, rare books, military manuals, maps, oral histories, ledger drawings, and ephemeral materials concerning the battle and participants from both sides of the conflict; the establishment of the National Cemetery, the significance and consequences of the Northern Plains Indian Wars to American Indian and Euro American cultures, and the park's own unique history. Most of the archival material in this group has been managed as museum collections, with each photograph, map, paper, or book cataloged individually.

Natural Resource Collections

Collecting and maintaining a natural resource collection is part of the park's resource management and interpretive programs. This collection exists mainly to provide baseline data on park natural resources, to document changes to these resources because of internal park conditions and external effects, and to provide a database for researchers concerned with resource use by prehistoric and historic peoples, and as a result of park resource management actions.

All specimens collected and retained are accessioned into the museum collections (36 CFR 2.5). At the present, the park natural resource collection is exclusively biological, and the 239 specimens are curated at Yellowstone National Park and the University of Arizona Laboratory of Tree-Ring Research.

No geological or paleontological specimens are in collections at this time. A plesiosaurus fossil specimen was uncovered in 1977 during a burial in the cemetery. Site-related paleontological

materials were transferred to Dinosaur National Monument in 1985 and later to the Smithsonian Institution, Washington, D.C.

Native American Graves Protection and Repatriation Act Compliance Status

At the time of this writing, Little Bighorn Battlefield National Monument is in full compliance with the Native American Graves Protection and Repatriation Act of 1990, having completed the required NAGPRA Summary in 1993 and NAGPRA Inventory in 1995. The 1993 summary for the battlefield lists approximately 95 items that may be subject to NAGPRA provisions. In 1996, NPS staff sponsored NAGPRA consultation meetings in Billings, Montana, to discuss NAGPRA issues and the repatriation of human remains. In 1996 and 1997, the National Park Service completed a memorandum of agreement with culturally affiliated tribes for repatriation of American Indian human remains.

In 2009, Little Bighorn Battlefield National Monument initiated a two-year NAGPRA Summary process to consult and repatriate items under 43 CFR 10.8 “Summaries,” including Sacred Objects, Objects of Cultural Patrimony, and Unassociated Funerary Objects. As a result of the government to government consultations with tribal representatives and lineal descendants, several claims were received and processed. To date, 55 sacred items have been repatriated, and two additional items have been approved for repatriation.

Impacts To Museum Collections Under Alternative A (No-Action Alternative)

Under this alternative, the National Park Service would continue ongoing efforts to develop and install new exhibits in the visitor center. There would likely be very few, if any, museum objects displayed as part of the new exhibits, as the visitor center remodel would not include the installation of important museum collections environmental control and security or the installation of a fire suppression system. The majority of the collection would remain in the NPS Western Archeological Conservation Center, where its long-term protection could be ensured. However, some potential donors may be unwilling to donate their collections to the park because of the off-site storage location. Scheduled rotation of exhibited collection items in the visitor center would occur, although some of the collection items have previously sustained damage or deterioration from not being rotated on a regularly scheduled basis. Collections would continue to be protected off-site in secure environmentally-controlled conditions at NPS Western Archeological Conservation Center, although any museum objects exhibited at the remodeled visitor center would continue to be at a heightened level of risk from loss or damage because no fire suppression or security control systems would be installed in the visitor center. Archival and curation records would also be at a high degree of risk associated with loss or deterioration resulting from potential flooding or water damage in the lower level of the visitor center. Because the remaining objects and archival materials stored or exhibited in the visitor center have important intrinsic, interpretive, cultural and research values associated with the Battle of the Little Big Horn, the continuing deficiencies at the remodeled visitor center would result in long-term potentially substantial adverse impacts on these collection items, furthering their vulnerability to catastrophic damage or loss.

No remodel of the administration building would occur under the no-action alternative, and, consequently, collection items having particular cultural or ethnographic importance to associated tribes would not be returned to the national monument. The continued separation of these items from the site would continue to have a long-term moderate to severe adverse impact on the cultural connections that many tribal members hold for the battlefield site, curtailing their ability to properly reestablish and retain respect for the memories of their ancestors who perished in the

battle. Although researchers would have access to the collection at both the NPS Western Archeological Conservation Center and at the park, it may be inconvenient for some researchers.

Cumulative Impacts. There are no other identified past, present, and reasonably foreseeable future actions that would affect the museum collections. Therefore, no cumulative impacts were identified for the museum collections.

Conclusion. Alternative A would continue to have long-term and potentially severe adverse impacts on museum collections and archival materials because of the lack of security and environmental control systems in the remodeled visitor center to provide adequate protection. Although the majority of the collection would be protected and properly curated at NPS Western Archeological Conservation Center, the separation of culturally important objects from the site would continue to adversely impact tribal connections to objects of enduring cultural importance. Some researchers may be inconvenienced by needing to access the collection in multiple locations.

Impacts To Museum Collections Under Alternative B (NPS Preferred Alternative)

Installation of state-of-the-art environmental controls, fire suppression and security system in a new visitor center, and a potentially separate collections facility would enhance the protection of museum collection items and archival materials. Having the museum collections in a separate, on-site facility from the visitor center would present minimal challenges for rotating museum collections through the exhibits. The National Park Service would seek to return irreplaceable objects and artifacts related to the Battle of the Little Bighorn from the NPS Western Archeological and Conservation Center to the national monument. At a minimum, priority museum objects (if not the entire collection) would be returned and stored or exhibited under appropriate curatorial space and environmental conditions. These measures would result in long-term beneficial impacts on museum collections and archives. Collection items having particular cultural or ethnographic importance to associated tribes would receive a high priority for return to the national monument. Reestablishing the cultural connections that many tribal members hold for these objects would also result in a long-term beneficial impact on perpetuating tribal associations with the battlefield.

There would be some small element of short-term risk involved in preparing the collections for transport to Little Bighorn. However, this risk would be very small and of short duration. Movement of the collection would follow NPS established protocols.

The long-term effects on the collection would be an increased level of on-site protection whether in a new dedicated collection storage facility or in secure storage provided in a new visitor center. With substantially improved security (e.g., fire protection) and environmental conditions (e.g., controlled humidity and temperature) the collections would receive long-term protection and preservation. In addition, with the museum collections largely in one location, researchers would be able to more easily and efficiently access and use the collections.

Cumulative Impacts. There are no other identified past, present, and reasonably foreseeable future actions that would affect the museum collections. Therefore, no cumulative impacts were identified for the museum collections.

Conclusion. Alternative B would have a long-term beneficial effect on the museum collections and archives, substantially reducing the threats of loss or damage that could otherwise occur without adequate security and environmental protections. Tribal connections to objects of cultural importance would be enhanced with the return of important objects to the national monument, and researchers would have improved access to the collection compared to present conditions.

VISITOR USE AND EXPERIENCE

Introduction

This section describes aspects of visitor use and experience that could be affected by the management alternatives in the GMP amendment. The description of these elements is based on the best professional judgment of National Park Service staff, public scoping for this plan, and past and recent research efforts. The following visitor use and experience characteristics are discussed:

- Opportunities for visitors to understand the monument's important resources and stories, including opportunities to learn about the historic events leading up to the battle, the battle itself, and the consequences faced by both the military and American Indian contingents.
- Providing visitor orientation.

Overview of Visitor Use and Experience

The park is on the Crow Indian Reservation, approximately 60 miles southeast of Billings, Montana, and 70 miles north of Sheridan, Wyoming. Hours of operation for the various park facilities and visitor use areas change throughout the year and are posted on the parks website. When a visitor first enters Little Bighorn Battlefield National Monument they are able to access the visitor center near Last Stand Hill. Here the visitor can listen to interpretive programs, view a 25-minute park orientation video, explore the museum exhibits, and begin their journey along the tour road. This is a key way visitors learn about the monument's important resources and stories. The park currently has no auditorium and hosts interpretive presentations on the patio under a fiberglass overhang outside of the observation room.

When the visitor center was built in 1952, about 100,000 people visited the park every year. Visitation has since tripled and now averages more than 300,000 people a year. The current visitor center is about 8,000 square feet and the current administrative building about 5,200 square feet. Visitation numbers show that visitor use is decreasing; however, compared with other national battlefields, visitation remains relatively high. Visitation appears to be mostly new visitors instead of recurrent visitors. Some diverse demographic group numbers may be on the increase, such as international and tribal visitors. In addition, the number of oversized vehicles entering the park is increasing.

Orientation

For most visitors, printed and web-based materials are a primary source of general information about the monument. Park brochures are available at the monument's entrance station and visitor center when visitors first arrive at the monument. Visitors also receive information from the visitor center museum exhibits and on-site staff and volunteers. The visitor center is located near Last Stand Hill. Here, visitors are oriented and have access to interpretive material before traveling to the various destinations. In addition to interpretive information, visitors can also view park safety information and tips before exploring the park.

Currently visitors can view a movie in the visitor center's observation room, which serves as the park's theater. The observation room has a capacity for about 30 visitors at one time. During peak hours of visitation in May through September, many visitors stand outside the theater and attempt to peer inside the doors. Visitors outside the observation room trying to see the film often take up one-third of the museum floor space. The interpretive programs are held primarily on the patio under a fiberglass overhang outside of the observation room. The patio accommodates 80 individuals. At times, up to 200 individuals gather on and around the patio to attend interpretive

presentations. Because the common glass wall between the observation room/theatre and the patio allows sound transfer, the park is unable to meet visitor demand by simultaneously showing the film while interpretive programs occur. Demand for viewing the film during peak season exceeds the maximum number of showings by 100%.

Impacts To Visitor Use and Experience Under Alternative A (No-Action Alternative)

The impacts on visitor experience under the no-action alternative would include reduced access to exhibits and interpretive programs while the visitor center is undergoing remodeling. During construction, all or part of the visitor center would be closed to the public for approximately 12 months, including at various times the exhibits, the observation room, and the theater and bookstore. Although a temporary visitor facility, such as a trailer, would be provided during the remodeling of the visitor center, visitors would likely not be able to view exhibits or the park movie, and space within the temporary facility for any other interpretive or educational programs would be constrained, which would detract from the visitor experience during this period. The outdoor patio would be closed for some period of time, which would require another space for interpretive programs. In the peak summer season, interpretive programs might be held in the open. The lack of shade could increase health concerns for some at-risk visitors. During adverse weather conditions, some interpretive programs might be curtailed or cancelled, which is a continuation of the current condition. The existing restrooms and drinking water facilities adjacent to the park parking lot would remain available to visitors.

The use of areas adjacent to the visitor center for storage of construction equipment and materials could impede visitor flow at peak visitation times. Parking for construction vehicles would reduce parking capacity in the lot, which would affect visitors' ability to access the visitor center, particularly during peak times. However, the adverse impacts associated with the visitor center remodel would occur primarily during the construction period, and impacts would be intermittent during that time with construction vehicles absent at various times and days (depending on construction needs). In addition, with adequate advance warning visitors would know about the construction and could modify their plans to come when construction vehicles are not occupying the parking area. Thus, most visitors would not experience a substantial adverse impact on their experience.

After construction is completed, alternative A would result in improvements that would benefit visitors. Modifying the observation room for interpretive programming and improving building accessibility would improve the visitor experience. New exhibits would be provided, but there would likely be very few, if any, museum objects displayed as part of the new exhibits, as the visitor center remodel would not include the installation of important museum collections environmental control and security or the installation of a fire suppression system. This lack of museum collections on display could diminish the quality of the visitor experience. In addition, visitors would continue to experience congested conditions at interpretive programs during the peak visitation period from May through September, detracting from the quality of many visitors' experience.

Cumulative Impacts. The only past, present, or reasonably future action that would affect the visitor experience is the widening and other improvements to the Tour Road. Tour road construction would likely not occur at the same time as the visitor center remodel construction. In addition, the tour road would likely be completed in segments during low-visitor times. Impacts from construction activities to widen the road were evaluated in the 2005 environmental assessment for rehabilitation of the tour road (NPS 2005a). During the time when road

construction occurs, the visitor experience would likely occasionally be diminished because of traffic delays and possible temporary road closures. But after construction is completed, the tour road improvements would allow for more efficient traffic flow and better access to the Reno-Benteen Battlefield—visitors would have a safer and likely a more enjoyable experience driving the Tour Road compared to present conditions. When the beneficial effects of the tour road improvements (post construction) are added to the adverse and beneficial effects of alternative A, overall, there would be a beneficial cumulative effect on the visitor experience.

Conclusion. Alternative A would result in both adverse and some beneficial effects to the visitor experience. The quality of the visitor experience would continue to be diminished because of congestion in the visitor center during peak use times and the removal of most, if not all, museum collections objects on display as part of the exhibits. The visitor experience also would be degraded during the 12-month construction period. But once construction is completed, improvements to the observation room and building access would help improve the quality of the visitor experience in the long term compared to current conditions.

Impacts To Visitor Use and Experience Under Alternative B (NPS Preferred Alternative)

The construction of a new collections facility adjacent to or annexed to the existing administrative building should not adversely affect visitors, as it is located in the administrative area outside of the main visitor travel corridor. But if curation space to accommodate collections is included in the new visitor center, then some space that could be prioritized for additional visitor services would be appropriated for curatorial space instead, which could diminish some visitors' experience — e.g., there may not be as large a book store or space for visitor orientation.

Implementation of the NPS preferred alternative would have some adverse impacts on visitor experience lasting approximately 18 months. The demolition of the visitor center and resultant temporary loss of the theater space and removal of the museum exhibits (lasting about 6 months) and construction of a new visitor center (lasting about 12 months) would temporarily eliminate a critical component of the visitor experience. Although a temporary visitor facility, such as a trailer, would be provided during the construction of the new visitor center, which would help mitigate adverse effects, visitors would likely not be able to view exhibits or the park movie, and space within the temporary facility for any other interpretive or educational program would be constrained, which would detract from the visitor experience during this period. Also, with adequate warning being given to the public ahead of construction, many visitors would be aware of the construction, expect the changes, and modify their visit accordingly.

The ranger-led talks currently held on the visitor center patio would be affected by the construction work. Without the patio, visitors would at times be exposed to weather extremes and intense summer temperatures. The erection of a temporary shelter would help mitigate this impact on visitor experience. However, as a shelter of this type likely would be smaller than the existing veranda, there would still be some level of adverse impact on the overall visitor experience.

For the long term (beyond two years), the construction of a new visitor center would have a beneficial impact on visitor experience. Redesigned interior space in the visitor center would be prioritized to provide the basic visitor function—the bookstore, more room and better access for exhibits, a museum collection vault—and would facilitate visitor flow in the interior spaces. Theater space will only be available after these other priorities are met or if it can be integrated into the higher priority visitor function spaces. The exterior covered space would be retained to continue

interpretation of the exterior programming. A redesigned veranda would improve visitor access and experience during ranger interpretive talks.

The construction of a new collections facility or annex also would indirectly enhance the experience of park visitors. Although the collections facility or annex would not be open to the general public, ready access to the collection would streamline the efforts of park exhibit designers and builders in the design and development of new interpretive displays and exhibits.

Cumulative Impacts. The only past, present, or reasonably future action that would affect the visitor experience is the widening and other improvements to the Tour Road. Tour road construction would likely not occur at the same time as the visitor center and collections facility construction activities. In addition, the tour road would likely be completed in segments during low-visitor times. Although there would be some adverse effects on the visitor experience during the tour road construction period, after construction is completed these actions would have several beneficial effects, as described under alternative A (e.g., more efficient traffic flow and better access to the Reno-Benteen Battlefield). When the beneficial effects of the tour road improvements are added to the adverse and beneficial effects of alternative B, overall, there would be a beneficial cumulative effect on the visitor experience once construction is completed, because of visitors having better access to the visitor center and park, exhibits and interpretive/education programs, and reduced congestion.

Conclusion. Alternative B would result in both adverse and beneficial effects to the visitor experience. Although there would be adverse effects to those visitors coming to the park during the visitor center construction period, after the construction is completed, the quality of the visitor experience would improve because of the new visitor center and the return of the museum collection. Improved visitor access to exhibits, increased space, and other improvements for viewing the park film and interpretive and educational programs, would reduce congestion, and enable more visitors to participate in the interpretive and education programs—a beneficial effect for many visitors.

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Compliance Requirements, Consultation, and Coordination



CHAPTER 4: COMPLIANCE REQUIREMENTS, CONSULTATION, AND COORDINATION

INTRODUCTION

The general management plan amendment and environmental assessment for Little Bighorn Battlefield National Monument represents ideas presented by the National Park Service management, park staff, affiliated tribes, the State of Montana, and the public. Ongoing consultation and coordination among the tribes, agencies, and the public were vitally important throughout the planning process. The public had two primary avenues by which it could participate in development of the plan: public meetings and responding to newsletters by mail and through the NPS Planning, Environment, and Public Comment (PEPC) website.

PUBLIC SCOPING, MEETINGS, AND NEWSLETTERS

Public meetings and newsletters kept the public informed and involved in the planning process for this GMP amendment. Ongoing consultation with the public was initiated in October 2014.

To ensure a high degree of transparency and involvement with the public, opportunities to participate in the planning process were announced in many different ways. A mailing list was compiled that consists of members of governmental agencies, organizations, businesses, legislators, local governments, and interested citizens. A scoping newsletter including a comment card was sent in October 2014 via direct mail to those on this list. In addition, formal consultation letters were sent to tribes and regulatory agencies. These mailings aimed to inform the public on the project, announce opportunities for involvement, and initiate the formal public scoping period. A press release was issued, and public meetings were advertised via local media outlets, the park website, and social media tools. Comments were solicited online at the NPS Planning, Environment and Public Comment website (<http://parkplanning.nps.gov/LIBI>), and comment cards were made available online and at the public meetings and the park's visitor center. Comments from park employees were also solicited. The public was invited to submit comments through December 15, 2014.

The National Park Service conducted several public scoping meetings in November 2014 to gather ideas on identifying a range of reasonable alternatives. An open house in Hardin, Montana, on November 5, 2014, and a virtual public meeting on November 12, 2014, were held to promote a high level of interaction between the public and planning team personnel. The park superintendent met with the Hardin Area Chamber of Commerce and Agriculture on November 18, 2014. At each of these meetings, NPS staff gave a PowerPoint presentation regarding the planning effort and then were available to answer questions about the background, issues, and a reasonable range of alternatives. An electronic copy of the PowerPoint presentation was made available online at the PEPC website for the park.

Attendance at the open house in Hardin consisted of members of the local communities. The virtual public meeting allowed interested individuals who lived in distant areas to attend and interact with the planning staff. Altogether, nine people and five people, respectively, attended the two public meetings and twelve attended the Chamber of Commerce meeting for a total of twenty-five people.

Comment analysis began on December 20, 2014; any correspondence received after that date was retained for consideration but was not analyzed. During the public comment period, 19 pieces of

correspondence were entered into the PEPC system, either through direct entry by commenter or by uploading hard copy letters or electronic correspondence. Attendees at public scoping meetings also offered a number of valuable comments, which NPS staff incorporated into the comment analysis for consideration in the plan.

A second newsletter focused on preliminary management alternatives was distributed in June 2015. The public comment period for those preliminary alternatives was from June 24, 2015, to July 31, 2015. A total of 16 separate correspondences were received during that comment period. These comments were considered and will be incorporated as part of the documentation of the agency's decision.

CONSULTATION WITH OTHER AGENCIES, OFFICIALS, AND INDIVIDUALS

During preparation of this general management plan amendment, members of the planning team met and consulted with various entities.

ENDANGERED SPECIES ACT—SECTION 7 CONSULTATION

The Endangered Species Act of 1973, as amended, requires in section 7(a)(2) that each federal agency, in consultation with the Secretary of the Interior, ensure that any action the agency authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. Using the US Fish and Wildlife Service (USFWS) Mountain-Prairie Region endangered species consultation website map, the planning team assessed whether there was critical habitat or listed species in the park. By letter, on December 10, 2014, the National Park Service advised the USFWS field office in Montana planning process for this general management plan amendment / environmental assessment and asked for review of the current list of federally threatened, endangered, or candidate species within the monument. The USFWS Montana field office replied in a letter dated January 13, 2015, with updated species information and recommendations for mitigation measures and additional coordination with the Montana Fish, Wildlife & Parks and the Montana Natural Heritage Program. The US Fish and Wildlife Service determined that black-footed ferret, greater sage grouse, and Sprague's pipit may occur in the proposed project area. However, none of these species have been documented by park staff to occur in the visitor center area. Because the NPS preferred alternative (alternative B) would have no effect on federally listed threatened and endangered species, no further need for consultation with the US Fish and Wildlife Service was required.

NATIONAL HISTORIC PRESERVATION ACT—SECTION 106 CONSULTATION

The National Historic Preservation Act of 1966, as amended, requires federal agencies to take into account impacts to historic properties resulting from their undertakings.

In 2008, the National Park Service initiated consultation for the visitor center improvement plan, pursuant to Section 106 with the Crow Tribal Historic Preservation Office, the Montana State Historic Preservation Office, and the Advisory Council on Historic Preservation (ACHP). That consultation resulted in concurrence between these consulting parties on the identification and eligibility or listing of historic properties on the National Register of Historic Places within the area of potential effect, and the effect of the proposed undertaking on such historic properties. The National Park Service determined that no historic properties would be adversely affected by the proposed undertaking.

To minimize adverse impacts to historic properties that could potentially result from the undertaking, the National Park Service committed to produce a cultural landscape inventory for the Little Bighorn landscape, comply with management policies providing for sensitive design for new construction, plan for inadvertent resource discoveries, monitor construction activities for the undertaking, and to notify the Advisory Council on Historic Preservation should those conditions or other circumstances change, or if subsequent consultation among the consulting parties resulted in the National Park Service revisiting its determination of no adverse effect to historic properties. The cultural landscape inventory was completed and submitted to consulting parties for review in 2010. The additional commitments are reiterated in this environmental assessment.

In January of 2015, the National Park Service initiated further consultation with the consulting parties on this GMP amendment and environmental assessment to develop and analyze planning alternatives and clarify recommendations regarding the appropriate capacity, location, and functions of the monument's visitor center, including visitor access and collections storage, pursuant to Section 106 of the National Historic Preservation Act and in compliance with National Park Service management policies

COORDINATION WITH MONTANA NATURAL HERITAGE PROGRAM

By letter, on January 21, 2015, the National Park Service advised the Montana Natural Heritage Program office in Helena, Montana, of the planning process for this general management plan amendment and asked for review of the current list of state species of concern and special status species accessed from the Montana Natural Heritage Program's online database for Bighorn County. The Montana Natural Heritage Program replied in an email dated January 5, 2015, with updated species information.

COORDINATION WITH MONTANA FISH, WILDLIFE & PARKS

By letter, on January 21, 2015, National Park Service advised the Montana Fish, Wildlife & Parks office in Billings, Montana, of the planning process for this general management plan amendment and asked for review of the current list of state species of concern and special status species accessed from the Montana Natural Heritage Program's online database for Bighorn County. The Montana Fish, Wildlife & Parks replied in an email dated March 3, 2015, that the list provided for review appeared to be accurate. Additional in-person conversations were conducted throughout the planning period.

GOVERNMENT-TO-GOVERNMENT CONSULTATION

Prior to initiation of public scoping for the amendment to the park's 1986 general management plan, the superintendent of Little Bighorn Battlefield National Monument initiated ongoing consultation in a letter sent to the affiliated tribes on September 18, 2014. The letter stated the park's intent to conduct government-to-government consultation with tribes as well as consultations with tribes and corporations pursuant to Section 106 of the National Historic Preservation Act.

Government-to-government consultation meetings with the tribes traditionally associated with Little Bighorn Battlefield National Monument were held at the monument on October 15, 2014, and October 14, 2015. Attendees included NPS staff and representatives from the Standing Rock Sioux, Cheyenne River Sioux, Northern Cheyenne, and Northern Arapaho tribes. On December 18, 2014, NPS staff met with Crow tribal representatives. The comments and concerns discussed at these meetings were considered as part of this public scoping process.

INVOLVEMENT OF OTHER FEDERAL AND STATE AGENCIES, REGIONAL AND LOCAL GOVERNMENTS, AND PARTNER ORGANIZATIONS

On occasion, NPS staff communicated with representatives of federal and state agencies and regional and local governments on topics of mutual interest related to this plan. These groups were informed of the plan and suggestions for additional discussion topics and planning issues. These agencies/organizations are listed below and each has been provided a copy of this document.

Federal Government Agencies

- Advisory Council on Historic Preservation
- US Department of Agriculture, Natural Resource and Conservation Service
- US Department of Interior, US Fish and Wildlife Service

Traditionally Affiliated Tribes

- Arapaho Tribe of the Wind River Reservation, Wyoming
- Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation, Montana
- Cheyenne and Arapaho Tribes, Oklahoma (previously listed as the Cheyenne-Arapaho Tribes of Oklahoma)
- Cheyenne River Sioux Tribe of the Cheyenne River Reservation, South Dakota
- Crow Creek Sioux Tribe of the Crow Creek Reservation, South Dakota
- Crow Tribe of Montana
- Flandreau Santee Sioux Tribe of South Dakota
- Lower Brule Sioux Tribe of the Lower Brule Reservation, South Dakota
- Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana
- Oglala Sioux Tribe (previously listed as the Oglala Sioux Tribe of the Pine Ridge Reservation, South Dakota)
- Rosebud Sioux Tribe of the Rosebud Indian Reservation, South Dakota
- Santee Sioux Nation, Nebraska
- Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota; Spirit Lake Tribe, North Dakota
- Standing Rock Sioux Tribe of North & South Dakota
- Three Affiliated Tribes of the Fort Berthold Reservation, North Dakota (also known as the Mandan, Hidatsa & Arikara Nation)
- Yankton Sioux Tribe of South Dakota

State and Local Agencies

- State Historic Preservation Office of Archeology and Historic Preservation
- Montana Natural Heritage Program
- Montana Natural Resource Information System
- Montana Department of Transportation
- Big Horn County, Montana

Organizations

- Big Horn County Museum
- Custer Battlefield Historical and Museum Association
- Custer Battlefield Museum
- Custer Battlefield Preservation Committee
- Custer Memorial Association
- Friends of the Little Bighorn Battlefield
- Little Bighorn Associates
- National Parks Conservation Association

Appendixes



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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.



NATIONAL PARK SERVICE • U.S. DEPARTMENT OF THE INTERIOR

LITTLE BIGHORN BATTLEFIELD NATIONAL MONUMENT • GENERAL MANAGEMENT PLAN AMENDMENT / ENVIRONMENTAL ASSESSMENT

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