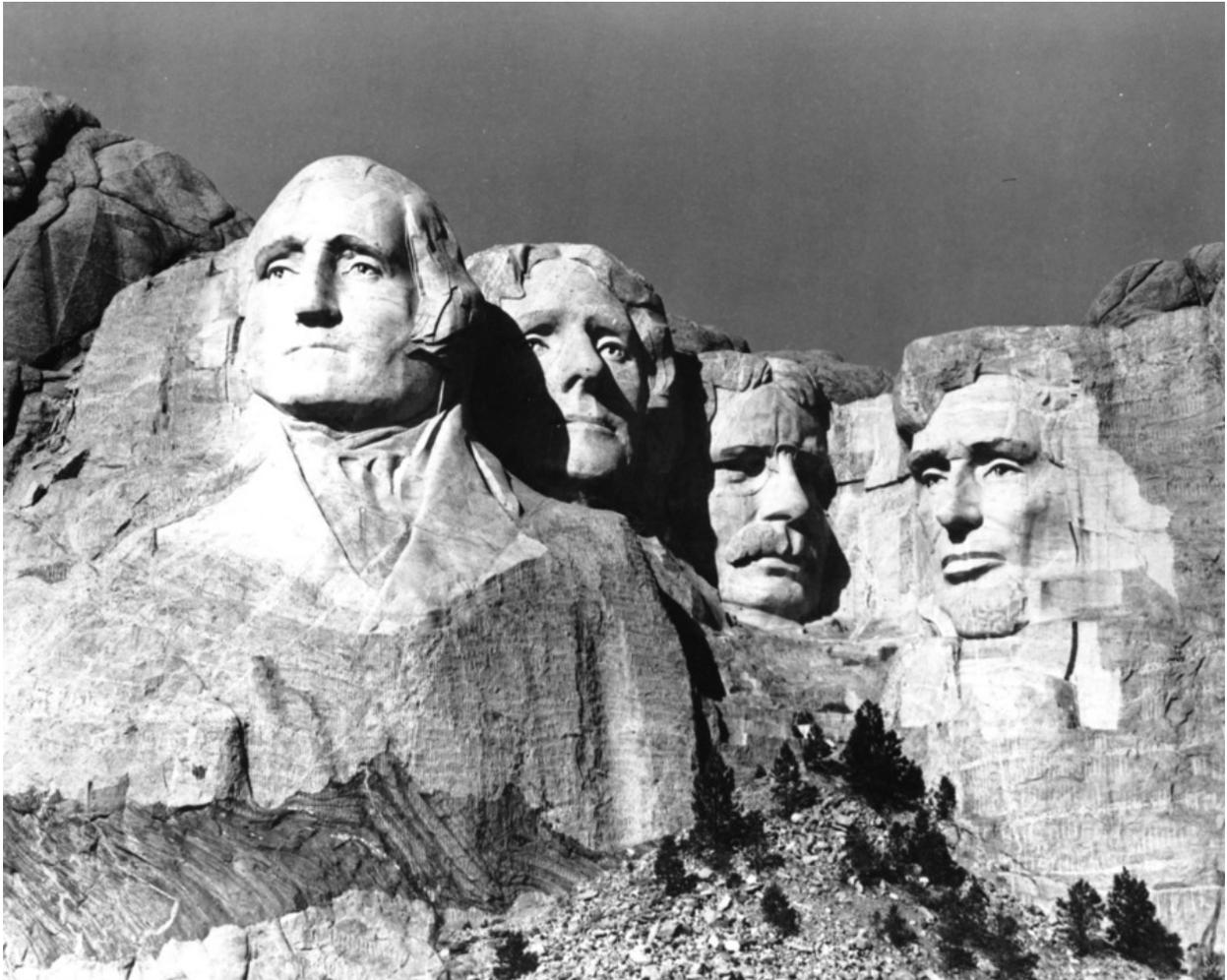


Mount Rushmore National Memorial

**Development Concept Plan / Environmental Assessment /
Finding of No Significant Impact**



May, 2019

Executive Summary

Mount Rushmore National Memorial (the Memorial) is proposing to construct a new facility to house its law enforcement dispatch and maintenance functions. The proposed construction is needed to improve the efficiency of the Memorial's operations and address existing space concerns.

This Environmental Assessment (EA) evaluates two alternatives; a No Action Alternative and a Proposed Action Alternative. Under the No Action Alternative, the Memorial's existing law enforcement, dispatch, and maintenance facilities would remain unchanged. The Proposed Action Alternative would allow for construction of a new facility within the Memorial to meet operational needs. Existing facilities would be modified or removed. Each alternative is described in more detail in the "Alternatives" section of this document.

This EA has been prepared in compliance with the National Environmental Policy Act (NEPA) to provide the decision-making framework that: 1) analyzes a reasonable range of alternatives to meet objectives of the proposed plan; 2) evaluates potential issues and impacts to the natural and cultural resources of Mount Rushmore National Memorial; and 3) identifies specific and required mitigation measures that are designed to lessen the degree or extent of these impacts.

Resource topics determined to potentially be affected by the alternatives include: visitor experience and safety. All other resource topics were not retained for full analysis because it was determined the Proposed Action would result in negligible impacts.

This plan fulfills a park planning priority for resource preservation, facility asset management the Memorial and serves as a component of the park's planning portfolio. The Memorial's planning portfolio consists of the individual plans, studies, and inventories, which together guide park decision making. The planning portfolio enables the use of targeted planning documents (such as this one) to meet a broad range of park planning needs and fulfill legal and policy requirements. The portfolio of plans will continue to be updated and/or supplemented in a timely manner through the development of additional park planning documents.

Public Comment

The National Park Service Planning, Environment and Public Comment (PEPC) site provides access to current plans and related documents on public review. Users of the site can submit comments for documents available for public review. If you wish to comment on the Environmental Assessment, you may post comments online at http://parkplanning.nps.gov/moru_dcp or mail comments to:

Bruce Weisman

Mount Rushmore National Memorial

13000 Highway 244, Building 31, Suite 1

Keystone, SD 57751

This EA will be on public review for 30 days. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware

that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

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Chapter 1 - Purpose and Need

Introduction

The National Park Service (NPS) manages and protects Mount Rushmore National Memorial (Memorial or park). The Memorial encompasses 1,278 acres in the Black Hills in southwestern South Dakota. The park is situated 2 miles southwest of Keystone, along State Highway 244. The Memorial has witnessed an increase in visitation in the last five years, reaching over three million visitors in 2017. The majority of visitation is for purposes of seeing the carved mountain and associated visitor facilities.

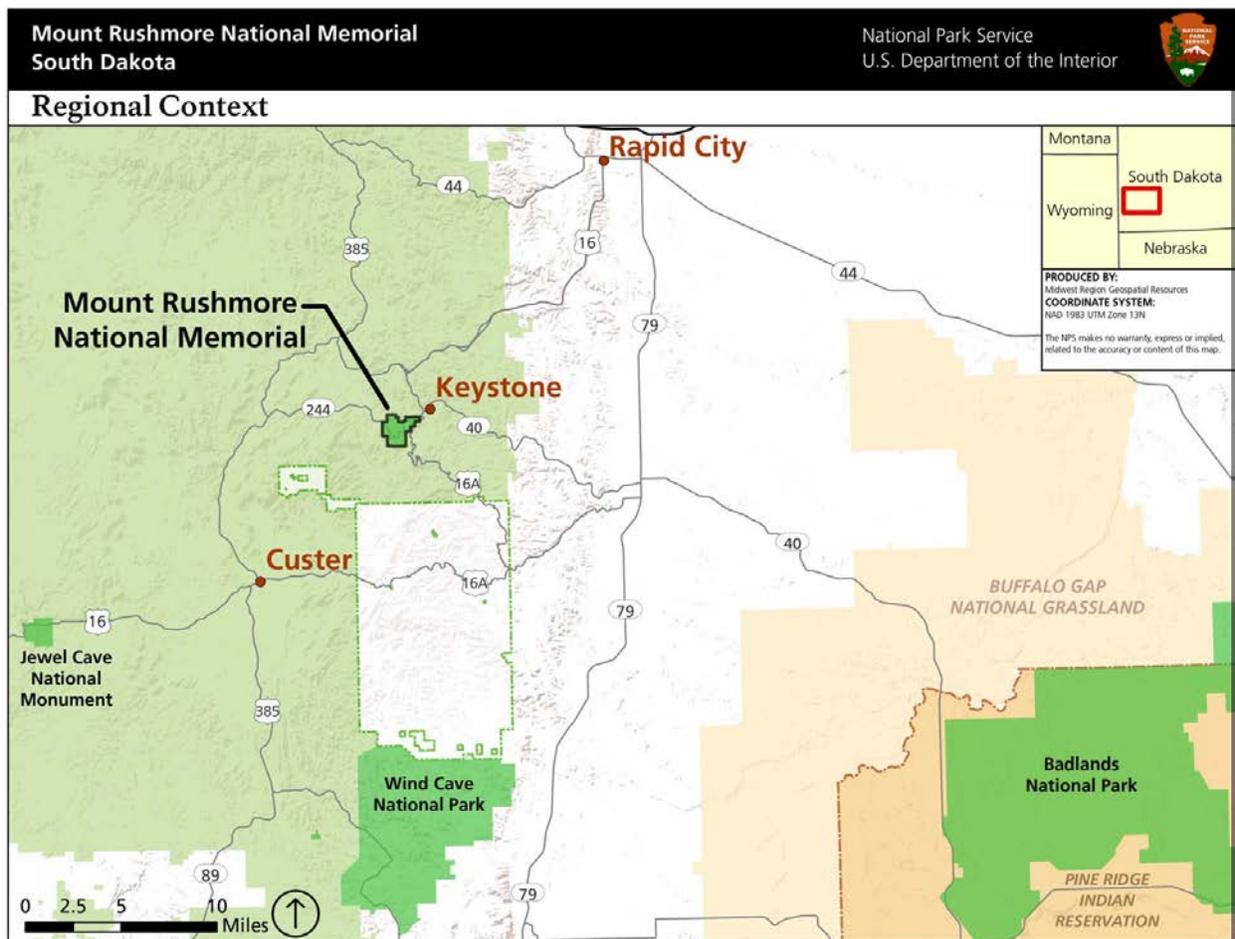


Figure 1 Regional map depicting location of Mount Rushmore National Memorial

The Memorial has been under the stewardship of the NPS since 1933. The NPS is tasked with the preservation and interpretation of the park's resources. The NPS manages the natural and cultural resources within the Memorial, including large stands of old growth ponderosa pine forest, granite peaks, historic buildings, archeological sites, and flora and fauna representing five distinct habitat communities.

The NPS provides protection for visitors, staff, and resources at the park. The operational management of the park has become increasingly complicated as a result of high visitation, space limitations, and aging resources and facilities. The NPS operates a substantial maintenance program at the Memorial which cares for the resources and facilities on site. There is also a significant law enforcement operation, including a regional NPS dispatch center. These two program areas are critical to the proper operation of the park. Maintenance and law enforcement dispatch operations do not currently have sufficient facilities; this plan presents options to meet facility needs.

The embedded Environmental Assessment (EA) examines the potential environmental consequences of the proposed action, as required under the National Environmental Policy Act (NEPA). Compliance with section 106 of the National Historic Preservation Act will be completed during the design phase of the project. This plan will be provided to the South Dakota State Historic Preservation Office (SHPO) as part of the coordination process. Many laws and policies guide management of NPS units. These laws and policies, as well as previous planning efforts by the NPS, guided the development of the plan and will provide a framework for this plan to operate.

Park Purpose - The purpose of the Memorial is to commemorate the founding, expansion, preservation, and unification of the United States by preserving, protecting, and interpreting the mountain sculpture in its historic, cultural, and natural setting while providing for the education, enjoyment, and inspiration of the public.

Park Significance

The following significance statements have been identified for the Memorial.

- Mount Rushmore is an internationally recognized symbol, representing the ideals of freedom and democracy.
- Mount Rushmore preserves a cultural and natural landscape within a dramatic setting of ponderosa pine forest and granite walls and spires in the Black Hills region of South Dakota.
- The sculpting of Mount Rushmore provided economic stimulation for the Black Hills region and greatly contributed to the tourism industry in South Dakota.
- The Mount Rushmore sculpture is a unique engineering and artistic achievement, considering the tools and processes available during the Depression era.
- The Mount Rushmore sculpture forever changed the landscape of a natural system.

Project Background

The development concept plan will identify the requirements for a new facility to support park law enforcement (LE) dispatch and maintenance operations. The LE dispatch operation (dispatch center) has outgrown its current building space requirements, and the maintenance operation lacks a unified location for staff and materials.

The Memorial became a designated Regional Dispatch Center in 2010 in order to offer dispatch services to the NPS parks in the upper Great Plains. Since that time, the dispatch center has

outgrown their original facilities. Technology associated with the dispatch center has also outgrown its existing space. Additionally, an expanding dispatch staff has outgrown parking facilities located at the Administration Building. A lack of storage space results in a cluttered atmosphere (and routine safety infractions due to lack of proper storage) due to the amount of equipment required to perform duties at the park. Lack of appropriate administrative space for LE Rangers results in overcrowding of parking lots, resulting in a higher probability of accidents and mishaps when maneuvering patrol vehicles in and out of the parking lot - especially during emergencies.

Relocation of the dispatch center would open up several hundred square feet of office space for administration and law enforcement employees currently working from cramped, substandard work areas and also provide the proper storage of materials, supplies, and equipment required to maintain and operate the park.

The maintenance division operation is scattered throughout the Memorial. Division staff and equipment are located in the historic studio building, which is not conducive to interpretive programming in the building and presents risks to the historic structure from maintenance equipment, chemicals, and tools. Fuel storage and fueling operations have recently been cited in environmental and safety inspections as being located in close proximity to buildings, including historic structures. Inspection recommendations have concluded an alternative site with appropriate distances is needed. Other materials are located in several 'bone yards' and temporary storage sheds on the interior of the Memorial. This results in inefficient work practices, as staff may need to visit multiple locations to retrieve tools and supplies. Visitors are impacted by the sights and sounds of maintenance functions adjacent to primary visitor destinations.

Purpose and Need for Action

Purpose – The underlying purpose of the project is to identify a suitable location within or near the park for a LE dispatch/maintenance facility, resulting in minimal environmental impacts and improved LE dispatch and maintenance operations.

Need - The project is needed to address the following issues:

- The existing maintenance operation is located in part of the basement of the historic sculptor's studio. The historic structures report for the sculptor's studio recommended rehabilitating the studio and reclaiming the basement level for interpretative programming, a process which is ongoing. In addition, there are inherent hazards from maintenance activities (i.e. fire and vibration) to both the historic structure and the museum objects that are exhibited within the historic studio. These maintenance activities and staff must eventually be moved to ensure that the historic structure remains in good condition in perpetuity for future visitors to the Memorial.
- In addition, maintenance staff, materials, and supplies are currently scattered throughout several locations at the park, decreasing the efficiency of operations. As a result, the

maintenance facility and staff will need a new central location to effectively maintain the park.

- The existing law enforcement facility is located at the park headquarters. In 2010 the park law enforcement facility became a regional dispatch center for several NPS park units in the region. Since that time, the dispatch center has outgrown the space available to it. Technology associated with the dispatch center has also outgrown its space needs. As a result of the increased operational needs of a regional dispatch center and heavily populated park, the existing office areas, and parking area are no longer suitable. A relocated dispatch center with additional space is needed for long-term effective and efficient operations.
- The need for expanding and consolidated space for maintenance and LE dispatch functions was first identified in park documents in 1980. Since then, the need has become more acute as visitation has increased and the Memorial has undergone other facility changes, increasing the responsibilities of maintenance and LE operations.

Proposed Action

A proposed action is the initial NPS proposal to address the purpose and need. The proposed action is to relocate the existing law enforcement dispatch center and maintenance operations into a newly constructed facility at Lot 6, which is east of the current administrative building and main visitor parking area. Lot 6 will provide the most appropriate location for the law enforcement dispatch center and maintenance operations to effectively address visitor and staff safety, maintenance of the Memorial, and preservation of the resources. Lot 6 is the best location for a joint facility due to its location, previous development, and access routes. A conceptual design will be developed for the facility and immediate surroundings, including utilities and parking areas.

Issues

Identifying significant issues related to a proposed action is an important part of scoping (1501.7(a)(3)). In the context of NEPA reviews, “issues” or “environmental issues” can be problems, concerns, conflicts, obstacles, or benefits that would result if the proposed action or alternatives, including the no-action alternative, are implemented. The following issues have been identified:

1. Construction of a LE dispatch center and maintenance facility at Lot 6 would disrupt visitor experience.
2. Lack of identifying a new joint LE dispatch and maintenance facility will continue to result in spacing challenges for park operations and reduce efficiencies of having a consolidated facility.

Impact Topics Retained

Visitor Experience and Safety - Visitors may be disrupted temporarily during construction of the proposed facility, by the sights and sounds of construction equipment. This is the case with other projects at the Memorial as well, such as parking improvements and repairs to the visitor center and stone pavers. Most construction activities for this project would occur in Lot 6, which

is outside the primary visitor areas of the park. There would also be temporary disruptions as equipment, utilities, and offices are moved from their current locations to the new location. Removing the majority of maintenance and dispatch functions out of the primary visitor areas would be a positive long-term impact on the visitor experience, in that it would remove a distraction from the sculpture and interpretive programming. This topic is retained for further analysis.

Impact Topics Considered but Dismissed from Further Analysis

Archeological Resources - The site for the proposed new structure has been previously disturbed. Lot 6 is currently a paved parking lot, used for administrative parking and a helicopter landing zone. The site has been cleared and is served by some utilities. Construction may expand the footprint of the developed area, depending on final design. While no known archeological resources exist in the potentially impacted area, there is a potential for discovery. Section 106 of the National Historic Preservation Act of 1966, as amended, provides the framework for federal review and protection of cultural resources, and ensures that they are considered during federal project planning and execution. If the preferred alternative calls for a project footprint outside the existing paved Lot 6 parking lot, a qualified archeologist would survey the proposed project area to mitigate possible adverse impacts to archeological resources. Therefore this impact topic has been dismissed.

Cultural Landscapes – “In the broadest sense, a cultural landscape is a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions (DO-28).” (NPS’s Director’s Order 28 Cultural Resource Management Guideline). The proposed new facility would not impact the cultural landscape of the sculpture and mountain. The proposal would move majority of the maintenance operations further from the sculpture and outside the park’s cultural landscape. Therefore this impact topic has been dismissed.

Historic Structures – Moving maintenance functions out of the sculptor’s studio would be a positive impact to that historic structure. This proposed action is directly related to the project need. No historic structures exist in the proposed project location at Lot 6. Therefore this impact topic has been dismissed.

Soils and Vegetation - The site for the proposed new structure has been previously disturbed. Lot 6 is currently a paved parking lot, used for administrative parking, occasional staging area, and a helicopter landing zone. The site has been cleared of soils and vegetation. No tree removal will occur for this project. Any impacts to soils and vegetation during project staging or construction would be negligible. Revegetation and recontouring of disturbed areas will take place following construction and will be designed and expedited to minimize the potential establishment of invasive exotic species and erosion. Therefore this impact topic has been dismissed.

Viewshed – The proposed new structure at Lot 6 would have negligible impacts on the viewshed, in comparison to the existing built environment and sculpture. Consolidation of maintenance functions would reduce scattered viewshed impacts currently existing. Hwy 244 is part of the Norbeck Scenic Byway for its scenic views. The final design will ensure the proposed facility and ancillary support equipment and storage will be low profile. Access/egress to the site will be non-obtrusive. The structure will be positioned to make it minimally visible to the public and be screened with existing vegetation. Final color design and profile will adhere to mitigation measures to ensure no long-term impacts to the viewshed. Negligible, short-term impacts will occur during construction from the presence of construction equipment and staging areas. Viewshed as an impact topic has been dismissed from further analysis due to the above stated reasons.

Transportation Patterns – Transportation for administrative use would change minimally from the established pattern. Visitor transportation patterns would not be expected to change. Currently, maintenance and LE vehicles enter the Memorial on the north side of State Highway 244, east and west of the main visitor parking facility. The new structure would divert a portion of the administrative traffic to Lot 6, which is east of the main visitor parking lot and south of State Highway 244. The proposed action calls for the construction of turning lanes into Lot 6 off State Highway 244. The proposed change would be negligible in comparison to visitor traffic, but would be more efficient from an administrative view, in that NPS traffic would be more separated from visitor traffic flows. This would be a positive impact on visitor traffic, which is currently impacted somewhat by the multiple administrative entrances and inefficient traffic patterns. The South Dakota Department of Transportation will be sent a copy during public comment period for input and ensure proper coordination among agencies. Coordination would continue during the design phase of the project. Transportation patterns as an impact topic has been dismissed from further analysis due to the above stated reasons.

Air Quality – The Clean Air Act of 1963 (42 U.S.C. 7401 et seq.) established federal programs that provide special protection for air resources and air quality related values associated with NPS units. Specifically, Section 118 of the Clean Air Act requires a park unit to meet all federal, state, and local air pollution standards. The Memorial is designated as a Class II air quality area under the Clean Air Act, which means emissions of particulate matter and sulfur dioxide are allowed up to the maximum increase in concentrations of pollutants over baseline concentrations as specified in Section 163 of the Clean Air Act. In addition, the Clean Air Act gives the federal land manager the responsibility to protect air quality related values (i.e., visibility, plants, animals, soils, water quality, cultural resources, and visitor health) from adverse pollution impacts. Motor exhaust and fugitive dust caused by mechanical equipment used during the construction of the joint-facility would be negligible and temporary. The Class II air quality designation would not be affected by the project. Therefore, air quality was dismissed as an impact topic for further analysis.

Water Resources and Floodplains – NPS policies require protection of water quality consistent with the Clean Water Act. The purpose of the Clean Water Act is to "restore and maintain the

chemical, physical, and biological integrity of the Nation's waters." To enact this goal, the U.S. Army Corps of Engineers has been charged with evaluating federal actions that result in potential degradation of waters of the United States and issuing permits for actions consistent with the Clean Water Act. The U.S. Environmental Protection Agency also has responsibility for oversight and review of permits and actions, which affect waters of the United States. There are no perennial streams or waterbodies within the project area.

Executive Order 11988 Floodplain Management requires all federal agencies to avoid construction within the 100-year floodplain unless no other practicable alternative exists. The NPS, guided by the 2006 Management Policies and Director's Order 77-2 Floodplain Management, will strive to preserve floodplain values and minimize hazardous floodplain conditions. According to Director's Order 77-2 Floodplain Management, certain construction within a 100-year floodplain requires preparation of a Statement of Findings for floodplains. There are no floodplains, perennial streams, or water bodies within the project area. The topic of water resources and floodplains was dismissed from further analysis.

Riparian/Wetlands – For regulatory purposes under the Clean Water Act, the term wetlands means "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas."

Executive Order 11990 Protection of Wetlands requires federal agencies to avoid, where possible, adversely impacting wetlands. Further, Section 404 of the Clean Water Act authorizes the U.S. Army Corps of Engineers to prohibit or regulate, through a permitting process, discharge of dredged or fill material or excavation within waters of the United States. NPS policies for wetlands as stated in Management Policies 2006 and Director's Order 77-1 Wetlands Protection, strive to prevent the loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. In accordance with DO 77-1 Wetlands Protection, proposed actions that have the potential to adversely impact wetlands must be addressed in a Statement of Findings for wetlands. There are no wetlands or riparian areas within the project area. Therefore, the riparian/wetland topic was dismissed from further analysis.

Special Status Species – The Endangered Species Act of 1973 requires an environmental assessment for projects on federally-managed lands to determine potential effects to all federally-listed endangered, threatened, and candidate species. Section 7 of the Endangered Species Act (ESA) requires all federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of federally listed species or designated critical habitats. In addition, the NPS *Management Policies* 2006 and Director's Order 77 Natural Resources Management Guidelines require the NPS to examine the impacts on federal candidate species, as well as state-listed endangered, threatened, candidate, rare, declining, and sensitive species. A list of federally listed species that may occur in or near the Memorial

was obtained from the USFWS website on July 27, 2017. The complete lists and associated summary descriptions of habitats for federally protected species that are likely to occur in Pennington County were reviewed on the USFWS South Dakota field office website at http://www.fws.gov/southdakotafieldoffice/endangered_species_newVersionP2.htm. The South Dakota Game, Fish, and Parks' list of threatened and endangered species was obtained from the agency's website at <http://gfp.sd.gov/wildlife/threatened-endangered/default.aspx>.

No federally or state listed threatened, endangered, proposed or candidate species are known or likely to inhabit the proposed project area; no designated critical habitats lie within or near the project area; and any effects to listed species if present would likely have few measurable consequences, the topic of special status species has been dismissed from further consideration in this EA. Consultation with USFWS will be completed as part of the EA.

Wildlife – The backcountry areas of the Memorial (wetlands, old growth forest, rock outcrops) provide a diverse and abundant habitat for many species of mammals, invertebrates, reptiles, amphibians, vegetation, and birds. Wildlife habitat in the project area is dominated by ponderosa pine, and scattered common juniper, and granite rock outcrops. The project area at Lot 6 is already disturbed and used by the park, and is not home to significant wildlife populations. Some individual animals could be affected as a result of the project, but there would be no effect on wildlife species' populations. In addition, consolidating maintenance activities may allow some maintenance storage and work areas to be returned to a natural state, benefitting wildlife. Those satellite locations that may be returned to a natural state would be revegetated and recontoured to minimize the potential establishment of invasive exotic species. Therefore wildlife is dismissed from detailed analysis.

Wilderness – There are no lands designated as wilderness or proposed wilderness in the Memorial. The proposed project area does not adjoin any designated wilderness areas in the Black Hills National Forest. Thus, this topic was dismissed from further consideration.

Invasive Species – The Memorial promotes management practices to limit potential impacts to vegetation, to protect sensitive vegetation resources, and to prevent or limit invasive species. Under the proposed action, there would be a risk of invasive species introduction and spread associated with any ground or vegetation disturbing activity. There would be heavy equipment used during construction and proposed mitigation actions if necessary, including monitoring for and treatment of any invasive, exotic plant species that appear on the site due to construction activities. Revegetation and recontouring of disturbed areas will take place following construction and will be designed and expedited to minimize the potential establishment of invasive exotic species. Strict invasive weed control best management practices would be used to minimize the introduction of invasive species. As a result, this topic was dismissed from further consideration.

Ethnographic Resources – Director's Order 28 (DO-28), *Cultural Resource Management*, defines ethnographic resources as any site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural

system of an associated traditional group. According to DO-28 and Executive Order 13007, Indian Sacred Sites, the NPS should preserve and protect ethnographic resources. The proposed action would be designed to minimize any impacts to known cultural resources and to restore native plant communities that could be identified as ethnographic resources. The Memorial regularly consults with tribes and associations and plans to continue such collaboration efforts. The Memorial has the goal of avoiding and minimizing impacts to ethnographic resources. No impacts to known ethnographic resources are expected to occur for this project; thus ethnographic resources were dismissed from further analysis.

Museum Collections – Director’s Order 24 *Museum Collections* states that NPS is required to consider the impacts on museum collections (historic artifacts, natural specimens, and archival and manuscript material), and provides further policy guidance, standards, and requirements for preserving, protecting, documenting, and providing access to, and use of, NPS museum collections. No museum collection items would be disturbed as a result of the proposed action and no collections would be added as a result of the action. Museum collections safety would be enhanced with the removal of maintenance operations in the historic studio. Therefore, museum collections were dismissed from further analysis.

Paleontological Resources – NPS 2006 *Management Policies* states that paleontological resources (fossils), including both organic and mineralized remains in body or trace form, will be protected, preserved, and managed for public education, interpretation, and scientific research. There are no known paleontological resources within the Memorial. No impacts to paleontological resources are expected as a result of the proposed action. Therefore, paleontological resources has been dismissed as an impact topic from further analysis.

Soundscapes – In accordance with the 2006 *Management Policies* for the NPS and Director’s Order 47 Sound Preservation and Noise Management, an important component of the NPS’s mission is the preservation of natural soundscapes associated with national park units (NPS 2006). Natural soundscapes exist in the absence of human-caused sound. The natural ambient soundscape is the combination of all the natural sounds that occur in park units, together with the physical capacity for transmitting natural sounds. The frequencies, magnitudes, and durations of human-caused sound considered acceptable varies among NPS units, being generally greater in developed areas and less in undeveloped areas.

Impacts to the soundscape would occur during construction. However, these impacts would be short term and negligible for wildlife. In the long term, sounds from law enforcement and maintenance activities would not change appreciably from their current levels. These sounds may be somewhat more concentrated at the new facility compared to their dispersed locations currently. Consolidating maintenance activities may allow some storage and work areas to be returned to a natural state, reducing sounds in these areas. Sound impacts on humans are considered in the visitor experience impact topic. Therefore, soundscapes are dismissed as an impact topic from further analysis.

Prime and Unique Farmlands – The Farmland Protection Policy Act of 1981, as amended, requires federal agencies to consider adverse effects to prime and unique farmlands that would result in the conversion of these lands to non-agricultural uses. Prime or unique farmland is classified by the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS). Prime farmland is defined as land that has the best combination of physical and chemical properties for producing food, forage, fiber, and oil seed, and for other uses (e.g., pasture land, forest land, and crop land). Unique farmland is defined as land other than prime farmland that can produce high value and fiber crops, such as fruits, vegetables, and nuts. There are no prime and unique farmlands designated in the project area; thus this topic was dismissed from further analysis.

Indian Trust Resources – Secretarial Order 3175 mandates any anticipated impacts to Indian trust resources from proposed project or action by the Department of Interior agencies 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. There are no designated Native American trust resources in the project area. Therefore, Indian Trust Resources was dismissed as an impact topic for further analysis.

Environmental Justice – Presidential Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

According to the Environmental Protection Agency, 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. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. The goal of 'fair treatment' is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects, and identify alternatives that may mitigate these impacts.

Keystone, South Dakota and other nearby small communities contain both minority and low-income populations; however, environmental justice was dismissed as an impact topic for the following reasons:

- Implementation of the preferred alternative would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The impacts associated with implementation of the preferred alternative would not disproportionately affect any minority or low-income population or community.

- Implementation of the preferred alternative would not result in any identified effects that would be specific to any minority or low-income community.

Socioeconomics – The proposed action would not appreciably change local and regional land use nor impact local businesses or other agencies. There could be minimal increases in employment opportunities and revenue generated in nearby small businesses from implementation of the proposed action. Any increase in workforce and revenue would be temporary and negligible. Because the impacts to the socioeconomic environment would be negligible, this topic was dismissed from further analysis.

Chapter 2 - Alternatives

NEPA requires that federal agencies conduct a careful, complete, and analytical study of the impacts resulting from proposals that have the potential to affect the environment, and to consider alternatives to those proposals, well before any decisions are made. This section describes the action alternative and no-action alternative. The following is a description of the alternatives selected for analysis, alternatives considered but dismissed, mitigation measures, environmentally preferable alternative, and the agency preferred alternatives.

Alternative 1 - No Action

Under the No Action alternative, the law enforcement, dispatch, and maintenance functions at the Memorial would continue to operate much as they do currently. No new facilities would be constructed. Due to the ongoing transformation of the historic sculptor's studio into an interpretive facility, some maintenance functions, equipment, and staff would be relocated to other existing facilities and locations. This would exacerbate current inefficiencies within the program, as materials, staff, and equipment would be dispersed over more locations. No changes would be expected to the operations or facilities of the law enforcement or dispatch programs.

Under alternative 1, no changes would occur at Lot 6. This paved parking area would remain in use for special events and be the designated helipad landing area for the park. Lot 6 would continue to be zoned for development as prescribed in the park's 1980 General Management Plan.

Existing Maintenance Facility Functions	Square Foot (SF)
Mechanic shop	589
Warm storage (custodial supplies)	589
Fuel/flammable storage	72
Fire cache	450
Key office/key storage	168
Restroom	36
Parts room	210
Ropes cage	121
Double garage	875
Breakroom/laundry	1696
Shop in garage area	1104

Garage area & storage	2664
Employee computer workstations	228
Facility supervisor office	330
Cold storage	1085
Sub-Total (Maintenance)	10,217 SF
Existing Dispatch Center Function	SF
Dispatch Supervisor Office	138
Electronics Tech Office	0
Dispatch	198
Electronics Room	91
Computer Room	256
Communications Room	21
Breakroom	70
Restroom	55
Sub-Total (Dispatch)	759 SF
Total Existing Dispatch and Maintenance	10,976 SF



No Action Alternative

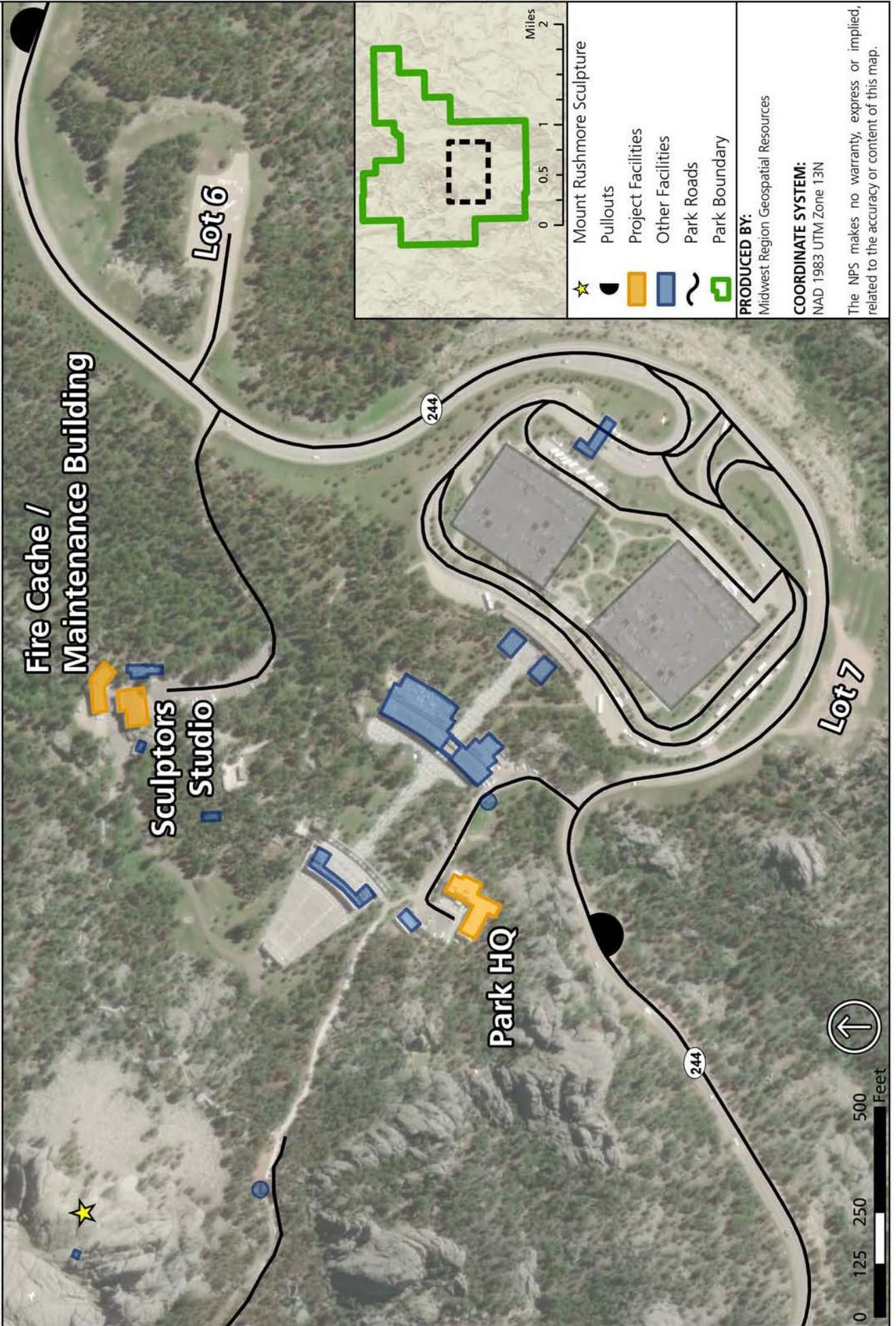


Figure 2 Map of existing park facilities



Figure 3 Photo of Lot 6 looking north



Figure 4 Photo of Lot 6 looking west towards the Memorial

Alternative 2 - Preferred Alternative (Proposed Action)

Under the preferred alternative, the LE dispatch center and maintenance functions at the Memorial would be consolidated in a new joint facility constructed at Lot 6. These functions would vacate their current office locations and most of their materials and vehicle storage locations. Some of the vacated locations would be available for reuse by other divisions; other locations would be returned to a natural state and revegetated, or made available for other types of uses. The existing administrative office building would be maintained. Additional administrative office space would be provided in the vacated dispatch center offices.

Lot 6 would continue to be zoned for development as prescribed in the park’s 1980 General Management Plan. No amendment to the management zones would be required.

The joint maintenance and LE dispatch facility would alleviate safety and operational concerns related to the current maintenance activity housed in the Sculptor’s Studio as described in the no-action alternative. The maintenance portion of the facility would include three offices, a meeting/break room, two vehicle maintenance bays, a carpenter shop, a grounds shop, an electrical shop, a plumbing shop, a warm storage bay, and storage space for interpretive materials. The facility would be sized to house storage of equipment, vehicles, and supplies.

The LE dispatch center portion of the facility would act as a communications-hub for law enforcement, security, and emergency services. It would include offices, a communications control room, administrative areas, a conference room, and multiple storage area/rooms for emergency equipment.

Parking and secure outdoor storage would also be located on the site. The joint facility would incorporate multiple features of green design and minimal site disturbance while supporting enhanced security measures. The new facility would provide efficiencies for the Memorial in terms of shared parking, fueling stations, employee areas (break room, bathrooms, offices, etc.), storage areas, and access.

Interior maintenance space requirements including ancillary structure for proper storage is approximately 9,165 square feet. Interior space would include adequate sized mechanical shop, flammable storage, key office, parts room, restrooms, breakroom, workstations, and limited office space for supervisors. This does not account for onsite exterior parking, aboveground storage tank for fueling, or other miscellaneous site requirements.

Interior Function Space Needs	SF
Mechanical Shop	800
Fuel/Flammable Storage	100
Key Office/Key Storage	125
Restroom (shared with dispatch)	1030

Parts Room	210
Double Garage	1200
Break Room/Laundry	1700
Shop in Garage Area	1200
Maintenance Employee Computer Workstations (2)	100
Maintenance Facility Supervisor Office	500
Dispatch Supervisor Office	200
Dispatch Electronics Technician Office	200
Dispatch Center	600
Dispatch Electronics Room	150
Dispatch Computer Room	250
Administrative/Conference Room	300
Interior storage/Emergency equipment	500
Estimated Total Interior Space Needs for Both Facilities	9,165 SF

The existing surface parking lot and curb and gutter system at Lot 6 would be largely demolished to simplify the construction process at the site. The demolished materials would be disposed of if not able to be reused.

The proposed joint facility would be housed in a single story structure. This design will ensure the facility has a limited height, appropriate color and facade to blend into the surrounding environment and not distract visitors. The final design will adhere to this plan and ensure the facility blends into the landscape and not distract from the visitor experience.

Ingress and egress: The access into Lot 6 would be for administrative use only. Appropriate sized turning lanes off State Highway 244 would be required. Coordination with the South Dakota Transportation Department would ensure appropriate design for traffic safety and transportation patterns. Gates would be installed to prevent visitor access into Lot 6. Signage, consistent with other signage throughout the Memorial, would be provided.

Utilities: New utilities would be provided to the new facility. This would include full water and sewer service, upgraded electrical service, fiber optic cable, and other utilities needed for dispatch operations. See preferred alternative map for the proposed location of utility connections.

Parking would be provided for NPS employees and limited guests to the facility. Parking storage would also be provided for maintenance facilities, including large equipment. Parking would be screened from visitor views by the building, outbuildings, native vegetation, or other means. The new facility would require approximately 20 employee parking spaces and five visitor parking spaces.

Storage garages: New staging and storage areas would be provided within and around the new facility. The new facility and environs would provide a centralized location for materials storage, fueling stations to serve park administrative needs (double-walled aboveground storage tank), work spaces for maintenance activities, etc.

The existing helicopter landing pad at Lot 6 would be removed. Lot 7 would be used on an ad hoc basis as a helipad.

Exterior function	SF
Backhoe Parking	200
Flatbed Truck Parking (2)	400
¾ Ton Utility Truck Parking	200
F-150 Parking	200
1500 Chevy Parking	200
Aboveground Fuel Storage Tank and fueling operations	1500
Refuse	250
Skid Loader Attachments	400
Employee parking (20 spaces)	4000
Visitor parking (5 spaces)	1000
Outdoor propane storage	100
Estimated Total Exterior Space Needs for both facilities	8,250 SF



Action Alternative Overview

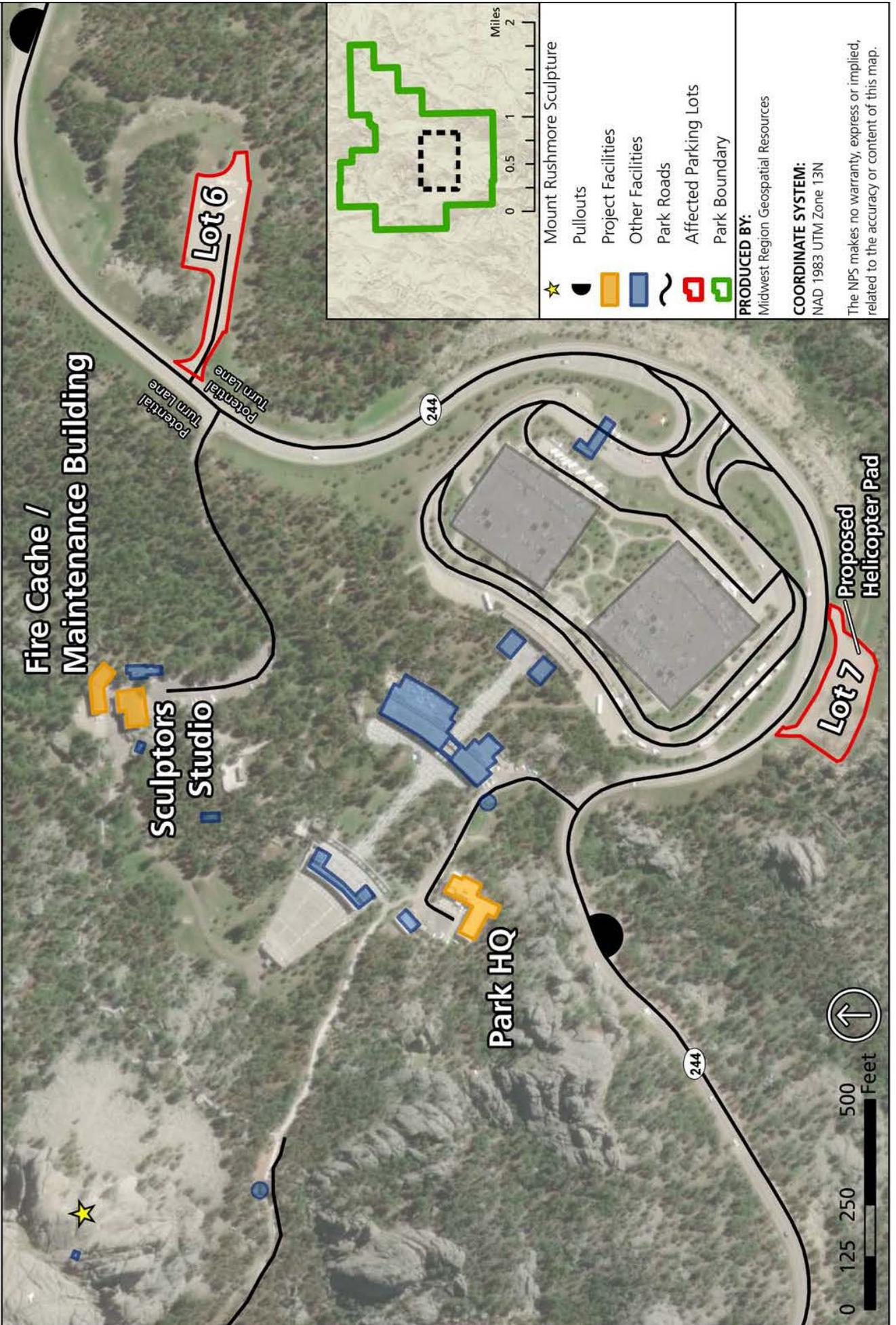


Figure 5 NPS Preferred Alternative Overview Map



Action Alternative

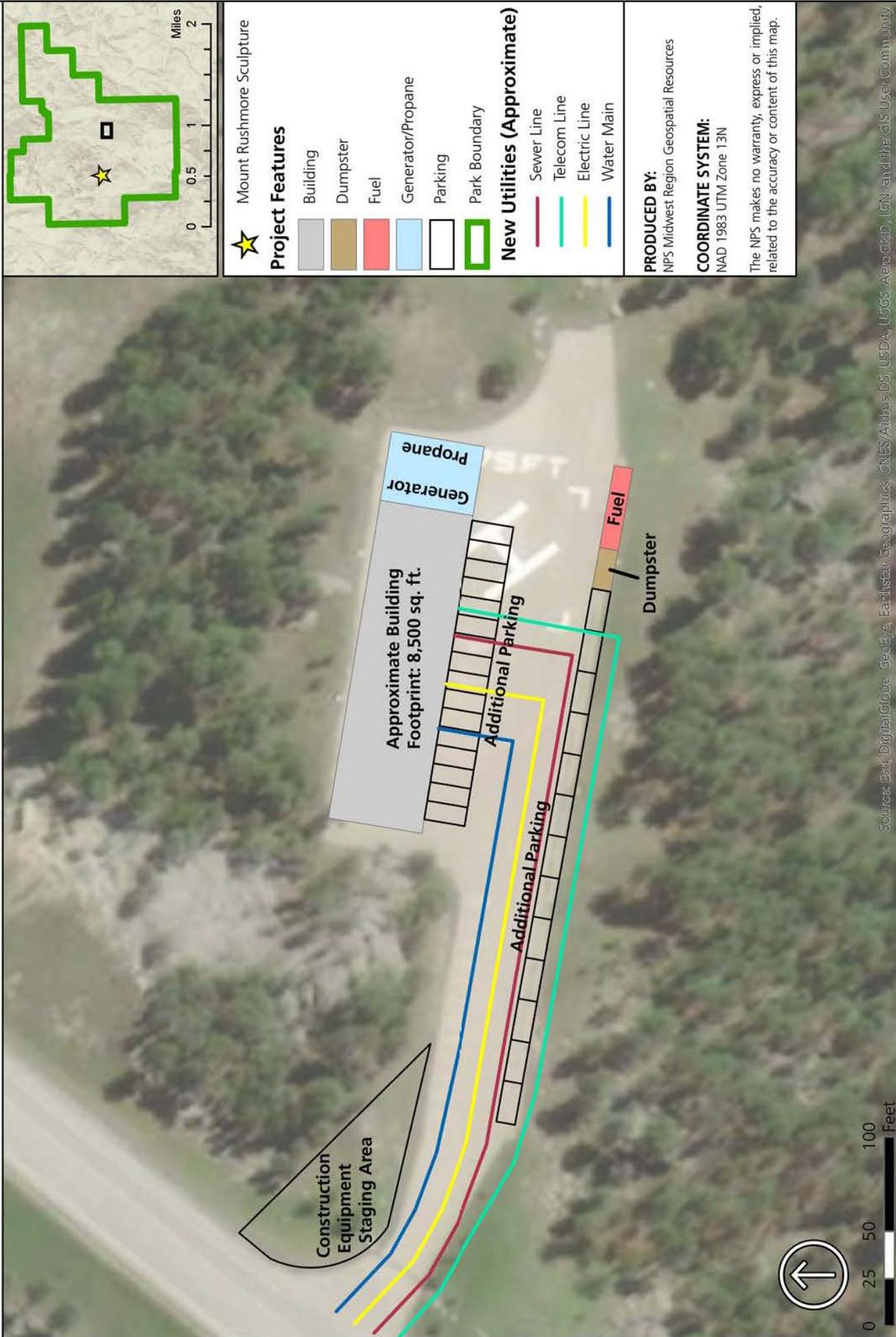


Figure 6 NPS Preferred Alternative Conceptual Map

Alternatives Considered but Dismissed

- **New facility at Lot 7.** The NPS considered constructing a joint facility at Lot 7. Lot 7 is located just south and west of the main visitor parking facility. It has been previously disturbed; it is currently graveled and used as a trailhead parking area and emergency operations staging area. Ultimately this alternative was dismissed due to the likely impacts on the viewshed from a new facility at this high point, near the primary visitor destination. This location also would not remove the maintenance and LE/dispatch functions from the primary visitor area.
- **New facility outside the park.** The NPS considered locating the maintenance and LE/dispatch functions outside the boundaries of the park, either in Keystone or in an unincorporated area near the park. This alternative was rejected because it would have created greater inefficiencies for the maintenance functions, in removing them from their work areas. There did not appear to be cost savings by renting existing facilities, or by purchasing/renting land and constructing new facilities on private land, compared to constructing a new facility on NPS property.
- **New facility located in the employee housing area.** The NPS considered constructing a joint facility on property near the employee housing area to the southeast of Lot 6. This location had many of the same benefits as Lot 6, but also had several downsides. The location would be farther from the main access road State Highway 244. Construction in this location would impact employees, as staff and maintenance vehicles would be required to pass through the housing area. Ultimately Lot 6 had more benefits and fewer downsides as a possible location.

Mitigation Measures for the Proposed Action

The following mitigation measures will be implemented and adhered to as part of project design:

- Archeological inventory. An archeological inventory would be completed for the project area ahead of ground disturbing activities. The NPS Midwest Archeological Center will document any findings and note any areas to be avoided.
- Inadvertent discovery plan. While no known archeological resources exist in the potentially impacted area, there is a potential for discovery. An inadvertent discovery plan will be developed to address this concern. If during construction previously undiscovered archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and an appropriate mitigation strategy developed in consultation with the State Historic Preservation Officer.
- Design. The new facility will be designed to blend into the existing landscape, with complementary colors and textures.
- Height restrictions. SD Highway 244 is part of the Norbeck Scenic Byway for its scenic views. The proposed facility at Lot 6 will be a single-store and adhere to height limitations to reduce the structure's visibility from the highway and from the main visitor areas of the park.

- Vegetation screening. Agency best practices would be used to develop vegetation screening of the facility and its functions, to the extent possible. Screening would help to limit intrusions to the landscape from the access/egress route as well. Vegetation used for screening would be native to the environment, and non-invasive. Vegetation would be selected for minimal maintenance.
- Revegetation and recontouring of disturbed areas, as necessary, would take place following construction and would be designed to minimize the visual intrusion of the improvements. Revegetation efforts would strive to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas, including those resulting in the removal of ancillary storage throughout the memorial would be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed.
- Strict invasive weed control Best Management Practices would be used, including, but not limited to, thoroughly pressure washing equipment before bringing it on site, would be implemented to minimize the introduction of noxious weeds.
- NPS staff will actively monitor for invasive plant species during and following construction.
- If any previously unrecorded threatened, endangered, or special status species is discovered during construction, then all work would stop until NPS staff evaluated the impact, and would allow modifications to any contracts or work plans for measures determined necessary to protect the threatened, endangered, or special status species.
- Signage. All national parks require administrative uses while welcoming visitors. Signage is necessary to help visitors understand where they are welcome and what locations are off-limits. Signage would be the minimum necessary to accomplish the goals of education and voluntary compliance, and would be produced following the established style guide for the Memorial.
- Construction zones would be identified and fenced with construction tape or safety barrier fence prior to any construction activity. The fencing would define the construction zone and confine activity to the minimum area required for construction.
- All construction would be limited to the areas within the construction limits; all activity, including vehicle and material use and storage would not be allowed outside predetermined, marked construction/staging zones.
- Traffic controls would be installed to protect pedestrians and vehicles; barricades, lights, danger signals, and warning signs would be used; guardrails and fence would be installed to protect pedestrians; and pipes, hoses, pipes, and power lines crossing sidewalks and walkways would be covered.

Agency Preferred Alternative

The agency-preferred alternative is the action alternative, construct a new joint facility at Lot 6. The advantages to operational functionality of the Memorial outweigh the minimal impacts to the environment under the proposed action.

Chapter 3 - Affected Environment

This chapter summarizes relevant resource components of the existing environment of the Memorial. It focuses on the Memorial resources and uses that have the potential to be affected if any of the alternatives were implemented (including the no-action alternative) and provides a baseline against which environmental consequences of the action alternatives can be compared. Additional material related to the impacts and effects of the alternatives is included in “Chapter 4: Environmental Consequences.”

Visitor Experience and Safety

Visitors come to the Memorial to view and learn about the Memorial, visit the information center and bookstore and shop in the park gift shop (NPS 2007). Most visitors spend the majority of their time in the developed visitor areas. Visitors enjoy a variety of activities in the backcountry of the Memorial, including hiking, bird watching, rock climbing, photography, and wildlife viewing.

The Memorial is open year round, except Christmas Day. The Memorial grounds are open on Christmas Day, however, the facilities are closed. Facilities at the Memorial include the Information Center, the Lincoln Borglum Museum and Visitors Center, two movie theatres, an amphitheater, Avenue of Flags, Grand View Terrace, the historic Sculptor’s Studio, the 0.6 mile Presidential Trail, Restaurant and Gift Shop (concessioner assigned), Audio Tour Building, administration building and parking facilities (concessioner assigned). Majority of the existing facilities and a portion of the trails are accessible. The films are provided with closed captioning. Park brochures are available by request in braille and large print.

Annual visitation to the Memorial was approximately 2,000,000 during 2011, with most visitors arriving between May to September. The Memorial has witnessed an increase in visitation in the last five years, reaching over three million visitors in 2015 - 2017. User groups include general visitor and park neighbors, organized groups, and education groups. The Evening Lighting Ceremony, which begins in May and concludes the end of September is very popular and attracts between 2,000 and 3,000 visitors nightly during the summer months.

- Visitors can experience significant traffic and crowding if their visit occurs during the most popular times for visitation. Traffic can sometimes backup on State Highway 244 due to delays at the parking facility and the volume of visitors.
- Most visitors do not interact or see evidence of maintenance or law enforcement operations during their visit to the Memorial, even though these operations are ongoing near the main visitor areas. Some visitors will see park staff passing through parking areas, roadways, and visitor areas as they maneuver throughout the park. Occasionally law enforcement and maintenance activities are necessary at visitor areas, and these operations impact the visitor experience.

Chapter 4 - Environmental Consequences

NEPA requires that environmental documents discuss the environmental impacts of a proposed federal action, feasible alternatives to that action, and any adverse environmental effects that cannot be avoided if a proposed action is implemented. In this case, the proposed federal action is the construction of a joint maintenance and law enforcement dispatch facility, including utilities. This chapter analyzes the environmental impacts of implementing the two alternatives on visitor use and experience and safety. (Please refer to the impact topics sections in Chapter 1 for a list of the impact topics addressed in this chapter.) This analysis is the basis for comparing the beneficial and adverse effects of implementing the alternatives. By examining the environmental consequences of all alternatives on an equivalent basis, decision makers can evaluate which approach would create the most desirable combination of benefits with the fewest adverse effects on the park.

This project has limited environmental or other consequences. The proposed project location is in an area that has been previously disturbed. The NPS has analyzed one impact topic which could be affected by the project.

This chapter begins with a brief explanation of general methods followed by a discussion of how cumulative impacts are analyzed for the alternatives. Following this section, the impact analysis is presented. Each of the alternatives, including the no-action alternative (continuation of current management), is analyzed for adverse or beneficial changes that would occur to the existing conditions of each impact topic as presented in “Chapter 3: Affected Environment.” After describing the impacts of the alternative, the cumulative effects of each impact topic are discussed and a conclusion stated. Adverse effects are not significant unless specifically stated.

Methodology

The effects of each alternative are assessed for direct, indirect, and cumulative effects for each resource topic selected. Actions are first analyzed for their direct and indirect effects. Direct effects are impacts that are caused by the alternatives at the same time and in the same place as the action. Indirect effects are impacts caused by the alternatives that occur later in time or are farther in distance than the action. Potential impacts are described in terms of type, context, duration, and intensity. Specific impact thresholds are given for each resource at the beginning of each resource section. General definitions for potential impacts are described as follows:

Type: Describes the impact as either beneficial or adverse, direct or indirect:

- Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.
- Adverse: A change that moves the resource away from a desired condition or detracts from its appearance or condition.
- Direct: An effect that is caused by an action and occurs in the same time and place.
- Indirect: An effect that is caused by an action but is later in time or farther removed in distance, but is still reasonably foreseeable.

Context: Describes the location or area where the impacts will occur.

1. Site-specific - impacts would occur within the location of the Proposed Action
2. Local – impacts would affect areas within the location of the Proposed Action and land adjacent to the Proposed Action
3. Regional – impacts would affect areas within the location of the Proposed Action, land adjacent to the Proposed Action, and land in surrounding communities.

Duration: Describes the length of time an impact would occur, as either short-term or long-term.

- Short-term: impacts that generally last for the duration of the project. Some impact topics will have different short-term duration measures and these will be listed with the resource.
- Long-term: impacts that generally last beyond the duration of the project. Some impact topics will have different long-term duration measures and these will be listed with the resource.

Cumulative Impact Scenario Analysis Methodology

The Council on Environmental Quality (CEQ) regulations, which guide the implementation the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7). Cumulative impacts are considered for all Alternatives.

Cumulative impacts were determined by combining the impacts of the alternative with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other ongoing or reasonably foreseeable future projects in the Memorial and, if applicable, the surrounding region. The temporal scope includes projects within a range of approximately 10 years. The following are past, present, and reasonably foreseeable future actions that have and could occur in the vicinity of the project area:

The Memorial has several ongoing and recently completed facility projects that could be considered cumulative impacts to the developed areas of the park. These project primarily affect previously-developed areas of the park.

- The park is in the process of rehabilitating the main visitor area between the parking structures and the amphitheater. This multi-stage process will include replacing the walkway pavers, widening the main walkway, removing some visual and access impediments, and repairing waterproofing systems in multiple locations. The work will be disruptive to operations and visitors but the park will attempt to complete the majority of work during times of low visitation.
- The park is actively rehabilitating the Sculptor's Studio, east of the amphitheater. The maintenance division is housed in this building and will be permanently removed following the construction of the new facility as proposed at Lot 6 in this plan. The

building may be closed intermittently during this process, and the work may be visible and audible to visitors.

- Xanterra, the park's concessioner, proposes to install solar panels on top of the parking structures. The panels would provide renewable power for Xanterra's operations. The panels may be visible to visitors, and construction may disrupt parking operations for a short time.
- Mickelson Trail Extension - the State of South Dakota and U.S. Forest Service have proposed an extension to the Mickelson Trail which would bisect 1.4 miles of the park. The State and Forest Service are working through an Environmental Impact Statement to clearly define the action and possible environmental consequences. Impacts to soils and vegetation from erosion would occur. Impacts to visitor experience and transportation patterns could occur depending on the final trail design and location.
- The park is augmenting and updating its fiber optic cable and other similar utility lines. This project may involve trenching in some locations, but should not disrupt operations or visitors' experiences at the park.

Other actions occurring around the park include the growth of gateway communities, timber harvest and fuels treatments in the Black Hills National Forest, and general maintenance work on area roads and infrastructure. Currently there is an infestation of pine beetles and the Memorial is currently removing infected trees in an attempt to reduce loss of healthy trees and maintain the old growth over story. Foreseeable actions include continued treatment of pine beetles which will likely result in a further reduction in timber density. None of these activities are expected to have a measurable impact on the soils and vegetation in the park, but they may have impacts on visitors, especially during active work periods.

Visitor Experience and Safety

Alternative 1

Direct and Indirect Impacts - Under the no-action alternative, there would be no immediate change to the existing law enforcement dispatch and maintenance operations. The continuation of maintenance operations in the historic Sculptor's Studio would delay the long-term vision for rehabilitation of the structure and use as an interpretive classroom. In addition, ongoing maintenance functions within the primary visitor areas would continue to result in a distraction to the visitor use and experience of the area. The Sculptor's Studio receives high volumes of visitors. The continued use of the area as the primary maintenance facility increases safety related incidents.

Cumulative Impacts - Cumulative impacts to visitor experience and safety could be experienced due to the multiple infrastructure and facility projects planned in and around the Memorial. These impacts would be negligible depending on the timing of the work during the visitors' trip.

Conclusion - Alternative 1 would not add any additional impacts to visitor experience and safety.

Alternative 2

Direct and Indirect Impacts - Short term impacts would be expected to be adverse due to disruption in traffic patterns, the potential for road restrictions or temporary lane closures, and the relocation of maintenance and LE materials, staff, and fleet from current locations to the new facility. During construction of the proposed facility, adverse, short-term impacts to viewshed will occur. Construction staging area and building activities will interfere with the visual resources from certain vantage points. The final design will ensure the proposed facility and ancillary support equipment and storage will be low profile. Access/egress to the site will be non-obtrusive. The structure will be sited to make it minimally visible to the public and be screened with existing vegetation. Final color design and profile will adhere to mitigation measures to ensure no long-term impacts to the viewshed. Negligible, short-term impacts will occur during construction from the presence of construction equipment and staging areas.

Cumulative Impacts - Cumulative impacts to visitor experience and safety could be experienced due to the multiple infrastructure and facility projects planned in and around the Memorial. These impacts would be negligible depending on the timing of the work during the visitors' trip. The proposed action would add to these impacts by introducing additional work areas, potential road closures or restrictions, and a change in traffic patterns during site preparation and construction periods. Long-term, the cumulative impacts are expected to be beneficial to both visitors' experience and visitor safety.

Conclusion - Short-term there would be adverse impacts due to construction and disruption to normal activity patterns. Removing the majority of maintenance and dispatch functions out of the primary visitor areas would be a positive long-term impact on the visitor experience, in that it would remove a distraction from the sculpture and interpretive programming. Long-term impacts are expected to be beneficial to both visitors' experience and visitor safety.

Chapter 5 - Consultation and Coordination

The following federal and state agencies, and affiliated Native American tribes were sent the plan/EA.

Federal Agencies

- US Fish and Wildlife Service
- US Forest Service (Black Hills National Forest)

State Agencies

- South Dakota Historic Preservation Office
- South Dakota Department of Transportation

Affiliated Native American Groups

- Cheyenne River Sioux Tribe
- Crow Creek Sioux Tribal Council
- Flandreau Santee Sioux Tribe
- Fort Peck Tribal Executive Board
- Lower Brule Sioux Tribal Council
- Northern Arapaho Tribe
- Northern Cheyenne Tribal Council
- Oglala Sioux Tribal Council
- Rosebud Sioux Tribal Council
- Santee Sioux Tribal Council
- Sisseton-Wahpeton Oyate Tribal Council
- Spirit Lake Tribe
- Standing Rock Sioux Tribal Council
- Three Affiliated Tribes Business Council
- Yankton Sioux Tribe

Section 106 of the National Historic Preservation Act

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the impacts of their undertakings on historic properties. This development concept plan / environmental assessment evaluates impacts on cultural resources according to NPS *Management Policies* 2006.

Compliance with section 106 of the National Historic Preservation Act will be completed during the design phase of the project. This plan will be provided to the South Dakota State Historic Preservation Office as part of the coordination process.

Section 7 of the Endangered Species Act

Section 7 of the Endangered Species Act requires federal agencies to consult with the US Fish and Wildlife Service regarding the potential for proposed actions to ensure that any action it

authorizes, funds, or carries out is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. As described in chapter 1, no threatened and endangered species or habitats are known to occur in the project area. As a result, the NPS will seek concurrence from the US Fish and Wildlife Service on the determination that the project would have no effect on federally listed species.

List of Preparers

Mount Rushmore National Memorial

- Cheryl Shreier, Superintendent
- Mark Denker, Facility Manager (former)
- Bruce Weisman, Integrated Resource Program Manager
- Doug Livermore, Facility Supervisor
- Donald Kammerer, Administrative Officer
- Don Hart, Chief Ranger

Midwest Regional Office

- Tokey Boswell, Chief of Planning
- James Lange, Portfolio Manager
- Brett Nie, Architect
- Matt Colwin, GIS Specialist



FINDING OF NO SIGNIFICANT IMPACT

Joint Maintenance and Law Enforcement Dispatch Facility Development Concept Plan and Environmental Assessment

Mount Rushmore National Memorial, South Dakota

INTRODUCTION

The National Park Service (NPS) prepared a development concept plan / environmental assessment to analyze alternative actions and environmental impacts associated with the proposed project to develop a joint maintenance and law enforcement (LE) dispatch facility at Lot 6 within Mount Rushmore National Memorial (Memorial or park), a 1.20 acre parking lot.

The purpose of the park is to commemorate the founding, expansion, preservation, and unification of the United States by preserving, protecting, and interpreting the mountain sculpture in its historic, cultural, and natural setting while providing for the education, enjoyment, and inspiration of the public. The Memorial has been under the stewardship of the NPS since 1933. The NPS is tasked with the preservation and interpretation of the park's resources. The NPS manages the natural and cultural resources within the Memorial, including large stands of old growth ponderosa pine forest, granite peaks, historic buildings, archeological sites, and flora and fauna representing five distinct habitat communities.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the development concept plan / environmental assessment and associated decision file. To the extent necessary, relevant sections of the development concept plan/ environmental assessment are incorporated by reference below. A non-impairment determination is included in Attachment A.

BACKGROUND

The park encompasses 1,278 acres in the Black Hills in southwestern South Dakota. The park is situated 2 miles southwest of Keystone, along State Highway 244. The park has witnessed an increase in visitation in the last five years, reaching over three million visitors in 2017. The majority of visitation is for purposes of seeing the carved mountain and associated visitor facilities.

The significance of the park includes:

- The park is an internationally recognized symbol, representing the ideals of freedom and democracy.
- The cultural and natural landscape is preserved within a dramatic setting of ponderosa pine forest and granite walls and spires in the Black Hills region of South Dakota.
- The sculpting of Mount Rushmore provided economic stimulation for the Black Hills region and greatly contributed to the tourism industry in South Dakota.
- The Mount Rushmore sculpture is a unique engineering and artistic achievement, considering the tools and processes available during the Depression era.

- The Mount Rushmore sculpture forever changed the landscape of a natural system.

PURPOSE OF AND NEED FOR THE ACTION

The underlying purpose of the project is to identify a suitable location within or near the park for a LE dispatch/maintenance facility, resulting in minimal environmental impacts and improved LE dispatch and maintenance operations.

The project is needed to address the following issues:

- The existing maintenance operation is located in part of the basement of the historic sculptor's studio. The historic structures report for the sculptor's studio recommended rehabilitating the studio and reclaiming the basement level for interpretative programming, a process which is ongoing. In addition, there are inherent hazards from maintenance activities (i.e. fire and vibration) to both the historic structure and the museum objects that are exhibited within the historic studio. These maintenance activities and staff must eventually be moved to ensure that the historic structure remains in good condition in perpetuity for future visitors to the Memorial.
- Maintenance staff, materials, and supplies are currently scattered throughout several locations at the park, decreasing the efficiency of operations. As a result, the maintenance facility and staff need a new central location to effectively maintain the park.
- The existing LE facility is located at the park headquarters. In 2010 the park LE facility became a regional dispatch center for several NPS park units in the region. Since that time, the dispatch center has outgrown the space available to it. Technology associated with the dispatch center has also outgrown its space needs. As a result of the increased operational needs of a regional dispatch center and heavily populated park, the existing office areas, and parking area are no longer suitable. A relocated dispatch center with additional space is needed for long-term effective and efficient operations.
- The need for expanding and consolidated space for maintenance and LE dispatch functions was first identified in park documents in 1980. Since then, the need has become more acute as visitation has increased and the Memorial has undergone other facility changes, increasing the responsibilities of maintenance and LE operations.

ALTERNATIVES CONSIDERED

The development concept plan / environmental assessment considers a no action alternative and one action alternative. These alternatives are briefly summarized below. See pages 16-27 of the development concept plan / environmental assessment for the full description of each alternative.

ALTERNATIVE 1 (NO ACTION)

Under the no-action alternative, the NPS LE dispatch operations and maintenance functions at the park would continue to operate much as they do currently. No new facilities would be constructed. Due to the ongoing transformation of the historic sculptor's studio into an interpretive facility, some maintenance functions, equipment, and staff would be related to other existing facilities and locations. No changes would be expected to the operations or facilities of the LE dispatch program.

ALTERNATIVE 2 (SELECTED)

Under Alternative 2, the selected alternative, LE dispatch center and maintenance functions at the park will be consolidated in a new joint facility constructed at Lot 6, a 1.20 acre parking lot. These functions

will vacate their current office locations and most of their materials and vehicle storage locations. Some of the vacated locations will be available for reuse by other divisions; other locations will be returned to a natural state and revegetated, or made available for other types of uses. The existing administrative office building will be maintained. Additional administrative office space will be provided in the vacated dispatch center offices. Lot 6 will continue to be zoned for development as prescribed in the park's 1980 General Management Plan. No amendment to the management zones will be required.

The joint maintenance and LE dispatch facility will alleviate safety and operational concerns related to the current maintenance activity housed in the Sculptor's Studio as described in the no-action alternative. The maintenance portion of the facility will include three offices, a meeting/break room, two vehicle maintenance bays, a carpenter shop, a grounds shop, an electrical shop, a plumbing shop, a warm storage bay, and storage space for interpretive materials. The facility will be sized to house storage of equipment, vehicles, and supplies. The LE dispatch center portion of the facility will act as a communications-hub for law enforcement, security, and emergency services. It will include offices, a communications control room, administrative areas, a conference room, and multiple storage area/rooms for emergency equipment.

Interior maintenance space requirements including ancillary structure for proper storage is approximately 9,165 square feet. Interior space will include an adequately sized mechanical shop, flammable storage, parts room, restrooms, breakroom, workstations, and limited office space for supervisors.

The proposed joint facility will be housed in a single story structure. This design will ensure the facility has a limited height, appropriate color and facade to blend into the surrounding environment and not distract visitors. The final design will adhere to this plan and ensure the facility blends into the landscape and not detract from the visitor experience.

The existing surface parking lot and curb and gutter system at Lot 6 will be largely demolished to simplify the construction process at the site. The demolished materials will be disposed of if not able to be reused. Parking and secure outdoor storage will also be located on the site. The joint facility will incorporate multiple features of green design and minimal site disturbance while supporting enhanced security measures. The new facility will provide efficiencies for the park in terms of shared parking, fueling stations, employee areas (break room, bathrooms, offices, etc.), storage areas, and access.

The access into Lot 6 will be for administrative use only. Appropriate sized turning lanes off State Highway 244 will be required. Coordination with the South Dakota Transportation Department will ensure appropriate design for traffic safety and transportation patterns. Gates will be installed to prevent visitor access into Lot 6. Signage, consistent with other signage throughout the park, will be provided.

New utilities will be provided to the new facility. This will include full water and sewer service, upgraded electrical service, fiber optic cable, and other utilities needed for dispatch operations. See preferred alternative map for the proposed location of utility connections.

Parking will be provided for NPS employees and limited guests to the facility. Parking storage will also be provided for maintenance facilities, including large equipment. Parking will be screened from visitor views by the building, outbuildings, native vegetation, or other means. The new facility will require approximately 20 employee parking spaces and five visitor parking spaces.

New staging and storage areas will be provided within and around the new facility. The new facility will provide a centralized location for materials storage, fueling stations to serve park administrative needs (double-walled aboveground storage tank), and work spaces for maintenance activities.

The existing helicopter landing pad at Lot 6 will be removed. Lot 7 will be used on an ad hoc basis as a helipad.

BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

To prevent and minimize environmental impacts related to the selected alternative, the NPS will incorporate best management practices and mitigation measures into design plans and specifications to be implemented during the construction and post-construction phases of the project. This list includes mitigation measures that will be required in the contractor's specifications.

- Archeological inventory. An archeological inventory will be completed for the project area ahead of ground disturbing activities. The NPS Midwest Archeological Center will document any findings and note any areas to be avoided.
- Inadvertent discovery plan. While no known archeological resources exist in the potentially impacted area, there is a potential for discovery. An inadvertent discovery plan will be developed to address this concern. If during construction previously undiscovered archeological resources are discovered, all work in the immediate vicinity of the discovery will be halted until the resources could be identified and documented and an appropriate mitigation strategy developed in consultation with the State Historic Preservation Officer.
- Vegetation screening. Agency best practices will be used to develop vegetation screening of the facility and its functions, to the extent possible. Screening will help to limit intrusions to the landscape from the access/egress route as well. Vegetation used for screening will be native to the environment, and non-invasive. Vegetation will be selected for minimal maintenance.
- Revegetation and re-contouring of disturbed areas, as necessary, will take place following construction and will be designed to minimize the visual intrusion of the improvements. Revegetation efforts will strive to reconstruct the natural spacing, abundance, and diversity of native plant species. All disturbed areas, including those resulting in the removal of ancillary storage throughout the memorial will be restored as nearly as possible to pre-construction conditions shortly after construction activities are completed.
- Strict invasive weed control best management practices will be used, including, but not limited to, thoroughly pressure washing equipment before bringing it on site, will be implemented to minimize the introduction of noxious weeds.
- NPS staff will actively monitor for invasive plant species during and following construction.
- If any previously unrecorded threatened, endangered, or special status species is discovered during construction, then all work will stop until NPS staff evaluated the impact, and will allow modifications to any contracts or work plans for measures determined necessary to protect the threatened, endangered, or special status species.
- Design. The new facility will be designed to blend into the existing landscape, with complementary colors and textures.
- Height restrictions. SD Highway 244 is part of the Norbeck Scenic Byway for its scenic views. The proposed facility at Lot 6 will be a single-store and adhere to height limitations to reduce the structure's visibility from the highway and from the main visitor areas of the park.
- Signage. All national parks require administrative uses while welcoming visitors. Signage is necessary to help visitors understand where they are welcome and what locations are off-limits. Signage will be the minimum necessary to accomplish the goals of education and voluntary compliance, and will be produced following the established style guide for the Memorial.

- Construction zones will be identified and fenced with construction tape or safety barrier fence prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction.
- All construction will be limited to the areas within the construction limits; all activity, including vehicle and material use and storage will not be allowed outside predetermined, marked construction/staging zones.
- Traffic controls will be installed to protect pedestrians and vehicles; barricades, lights, danger signals, and warning signs will be used; guardrails and fence will be installed to protect pedestrians; and pipes, hoses, pipes, and power lines crossing sidewalks and walkways will be covered.

SIGNIFICANCE CRITERIA REVIEW

The intensity or severity of impacts resulting from implementing the selected alternative is evaluated using the ten criteria listed in 40 CFR 1508.27. Key areas in which impacts were evaluated include stormwater and floodplains, visitor experience and safety, cultural landscapes, historic structures, and paleontological resources. As defined, in 40 CFR 1508.27, significance is determined by examining the following criteria.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the NPS believes that on balance the effect would be beneficial.

The selected alternative will result in both beneficial and adverse impacts. Visitors may be disrupted temporarily during construction of the proposed facility, by the sights and sounds of construction equipment. Most construction activities for this project will occur in Lot 6, which is outside the primary visitor areas of the park. There will also be temporary disruptions as equipment, utilities, and offices are moved from their current locations to the new location. Removing the majority of maintenance and dispatch functions out of the primary visitor areas will be a positive long-term impact on the visitor experience, in that it will remove a distraction from the sculpture and interpretive programming.

The site for the proposed new structure has been previously disturbed. Lot 6 is currently a paved parking lot, used for administrative parking and a helicopter landing zone. The site has been cleared and is served by some utilities. Construction may expand the footprint of the developed area, depending on final design. While no known archeological resources exist in the potentially impacted area, there is potential for a discovery. A qualified archeologist will survey the project area as design documents are developed to mitigate possible adverse impacts to archeological resources. This is more evident if the footprint of the structure exceeds the existing parking lot footprint. The proposed new facility will not impact the cultural landscape of the sculpture and mountain. The proposal will move the majority of the maintenance operations further from the sculpture and outside the park's cultural landscape. Moving maintenance functions out of the sculptor's studio will be a positive impact to that historic structure. No historic structures exist in the proposed project location at Lot 6.

The site has been cleared of soils and vegetation. No tree removal will occur for this project. Any impacts to soils and vegetation during project staging or construction will be negligible. Revegetation and recontouring of disturbed areas will take place following construction and will be designed and expedited to minimize the potential establishment of invasive exotic species and erosion.

The proposed new structure at Lot 6 will have negligible impacts on the viewshed, in comparison to the existing built environment and sculpture. Consolidation of maintenance functions will reduce the

currently existing viewshed impacts. Hwy 244 is part of the Norbeck Scenic Byway. The final design will ensure the proposed facility and ancillary support equipment and storage will be low profile. The structure will be positioned to make it minimally visible to the public and be screened with existing vegetation. Final color design and profile will adhere to mitigation measures to ensure no long-term impacts to the viewshed. Negligible, short-term impacts will occur during construction from the presence of construction equipment and staging areas.

The selected action will be designed to minimize any impacts to known cultural resources and to restore native plant communities that could be identified as ethnographic resources. The park regularly consults with tribes and associations and plans to continue such collaboration efforts as the design process proceeds. No impacts to known ethnographic resources are expected to occur for this project.

(2) The degree to which the proposed action affects public health or safety.

Temporary road and facility closures will keep the public away from areas where potentially harmful construction activities are occurring. Because the public will not be exposed to construction activities, the level of adverse effects from the proposed construction activities will not be significant. During the operation of the proposed facilities, the health and safety of park visitors and staff will be addressed through the removal of all existing areas where vehicle movements conflict with other vehicle movements, and the reduction in pedestrian-vehicle conflict locations from four to two.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The selected alternative will not affect historic or cultural resources, wetlands, wild and scenic rivers, prime farmlands, or ecologically critical areas because those resources do not exist in the project area.

The site for the proposed new structure has been previously disturbed. Lot 6 is currently a paved parking lot. Construction may expand the footprint of the developed area, depending on final design. While no known archeological resources exist in the potentially impacted area, there is potential for a discovery. A qualified archeologist will survey the project area as design documents are developed to mitigate potential adverse impacts to archeological resources. This is more evident if the footprint of the structure exceeds the existing parking lot footprint. The proposed new facility will not impact the cultural landscape of the sculpture and mountain. The proposal will move majority of the maintenance operations further from the sculpture and outside the park's cultural landscape. Moving maintenance functions out of the sculptor's studio will be a positive impact to that historic structure. No historic structures exist in the proposed project location at Lot 6.

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

There were no highly controversial effects on the quality of the human environment identified during either the preparation of the EA or the public review period.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

No highly uncertain effects were identified during the planning for this project, and no effects associated with the selected alternative involve unique or unknown risks.

(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The selected alternative will not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration, because no significant effects have been identified, and all future actions will be analyzed and considered independently from the selected alternative.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

As described under criteria 1 and 3 above, with the implementation of mitigation measures and best management practices to reduce or eliminate adverse impacts on visitor experience, archeological resources, viewsheds, circulation patterns, and vegetation, the level of impacts will not be significant. When added to other past, present, and reasonably foreseeable future actions, as evaluated in the environmental assessment, the incremental impact of selected action will not result in a significant cumulative effect.

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places; or may cause loss or destruction of significant scientific, cultural, or historical resources.

Compliance with section 106 of the National Historic Preservation Act will be completed during the design phase of the project. This plan was submitted to the South Dakota State Historic Preservation Office as part of the coordination process. The South Dakota State Historic Preservation Office replied in a letter on November 15, 2018, requesting the NPS to submit the following information: 1) drawings that show the proposed new facility's size, layout, height, materials, and proximity to other resources at the park; and 2) photographs that show the existing Lot 6 and views from Lot 6, and renderings or simulations that show how the proposed building will affect viewsheds to and from existing resources at the park. The NPS will submit the requested materials as part of the design process. No adverse effects to cultural resources under Section 106 are expected.

The proposed action will be designed to minimize any impacts to known cultural resources and to restore native plant communities that could be identified as ethnographic resources. The Memorial regularly consults with tribes and associations and plans to continue such collaboration efforts. The Memorial has the goal of avoiding and minimizing impacts to ethnographic resources.

(9) The degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

The NPS determined that no federally listed threatened and endangered species or habitats are known to occur in the project area. In an email dated January 31, 2019, the NPS requested concurrence for this "no effect" determination. The selected alternative is not anticipated to have an adverse effect on federally listed and candidate species.

(10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected alternative will not violate any federal, state, or local laws or requirements imposed for the protection of the environment.

PUBLIC AND AGENCY INVOLVEMENT

The development concept plan / environmental assessment was made available for public review and comment on the park website and the NPS Planning, Environment, and Public Comment website (http://parkplanning.nps.gov/moru_dcp) during a 31-day period beginning October 22, 2018. No substantive comments were received during the public review period.

Compliance with section 106 of the National Historic Preservation Act will be completed during the design phase of the project. This plan was submitted to the South Dakota State Historic Preservation Office as part of the coordination process. The South Dakota State Historic Preservation Office replied in a letter on November 15, 2018, requesting the NPS to submit the following information: 1) drawings that show the proposed new facility's size, layout, height, materials, and proximity to other resources at the park; and 2) photographs that show the existing Lot 6 and views from Lot 6, and renderings or simulations that show how the proposed building will affect viewsheds to and from existing resources at the park. The NPS will submit the requested materials as part of the design process. No adverse effects to cultural resources under Section 106 are expected.

Section 7 of the Endangered Species Act requires federal agencies to consult with the US Fish and Wildlife Service regarding the potential for proposed actions to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. No federally or state listed threatened, endangered, proposed or candidate species are known or likely to inhabit the proposed project area and no designated critical habitats lie within or near the project area. In an email dated January 31, 2019, the NPS requested concurrence for this "no effect" determination. The selected alternative is not anticipated to have an adverse effect on federally listed and candidate species.

On October 17, 2018, the NPS sent the DCP/EA to affiliated tribes of the park seeking input and identification of possible issues. On November 14, 2018, the Northern Cheyenne Tribe (THPO) responded requesting to be included in the planning effort with regard to the potential for inadvertent discoveries of significance to Tribes. The THPO requested tribal participation in conducting survey work within areas defined in the final design. As part of the design process the NPS will continue dialogue with the Northern Cheyenne THPO.

FINDING OF NO SIGNIFICANT IMPACT

Based on the review of the facts and analysis contained in the environmental assessment, the NPS has selected alternative 2 for implementing the joint maintenance and law enforcement dispatch facility at Mount Rushmore National Memorial. The selected alternative will not have a significant impact either by itself or in consideration of cumulative impacts. Accordingly, the requirements of the National Environmental Policy Act, regulations promulgated by the Council on Environmental Quality, regulations promulgated by the Department of the Interior, and provisions of Director's Order 12 and the 2015 *National Park Service NEPA Handbook* have been fulfilled.

It is my determination that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with NEPA and CEQ regulations (40 CFR 1508 et. seq.), an environmental impact statement is not required and will not be prepared for implementation of the selected alternative.

Recommended:

Cheryl A. Schreier *2-21-19*
Cheryl Schreier, Superintendent Date

Approved:

Patricia S. Trap *3.5.19*
Patricia S. Trap, Acting Regional Director Date
Midwest Region

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

The National Park Service (NPS) Management Policies 2006 require analysis of potential effects to determine whether actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the 1916 General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always, seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give NPS managers discretion to allow adverse impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS the management discretion to allow certain impacts within parks, that discretion is limited by statutory requirement that the NPS must leave park resources and values unimpaired, unless a particular law directly and specially provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values. To determine impairment, the NPS must evaluate "the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts" (NPS 2006b).

This determination on impairment has been prepared for the NPS selected alternative described in the Finding of No Significant Impact. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and this impact area is not generally considered to be a park resource or value according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

No resources applicable to a non-impairment determination were carried forward for full analysis in the EA. Resource impacts will be short-term and limited in intensity.

SUMMARY

The NPS has determined that the implementation of the selected alternative (alternative 2) will not constitute an impairment of the resources or values of the park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the purpose and significance of the park, a thorough analysis of the environmental impacts described in the development concept plan / environmental assessment, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker.