



Finding of No Significant Impact Mount Rushmore National Memorial Backcountry Trail System

Background

The National Park Service (NPS) Mount Rushmore National Memorial (Memorial) proposes to add a multi-cultural, multi-generational backcountry trail system by 2016, which improves opportunities for visitors to discover the diversity of the park's ecosystem and cultural resources. This proposed trail system would provide new opportunities for education, interpretation and recreation. The proposed project is part of the Centennial Vision for Mount Rushmore, which seeks to become a center of excellence for sharing the story of America, for providing visitor opportunities and for protecting resources and people (NPS 2007).

The 1,278-acre Memorial is located in the central Black Hills in southwestern South Dakota. The Black Hills are a forested mountain range covering approximately 2 million acres. The park hosts approximately 3 million visitors per year. Mount Rushmore landscape is characterized by granite knobs, peaks, ridges and valleys covered with ponderosa pine and meadows. The Memorial is the most heavily visited park unit in the Northern Great Plains Network Parks. Almost all visitations are currently for purposes of seeing the famous mountain carvings of Presidents George Washington, Thomas Jefferson, Abraham Lincoln, and Theodore Roosevelt and the associated visitor facilities. Few visit the Memorial as a hiking destination. Most of the land surrounding the Memorial is administered by the Black Hills National Forest. The Black Elk Wilderness Area, the Peter Norbeck Wildlife Preserve and the Hell Canyon and Mystic Districts of the Black Hills National Forest are adjacent to the Memorial. Nearby communities include Rapid City, Hill City, and Keystone.

An interdisciplinary team (IDT) comprised of Memorial staff and representatives of interested state and federal government agencies employed a two-step process to generate and select alternatives for the environmental assessment. Public scoping comments were invited through two open houses and on the NPS-hosted Planning, Environment and Public Comment (PEPC) web site. Together, the ideas for the trails were developed, incorporating project objectives and issues raised by the IDT and public. Several alternatives were generated and refined on an iterative basis to best achieve the objectives of the project, which requires the proposed action to provide the following opportunities:

- Appreciation of the cultural and natural resources
- Potential guided and self-guided tours
- Educational and research opportunities
- Beneficial outdoor leisure activities
- Appreciation for environmental stewardship
- Multi-generational and multi-cultural experiences
- Opportunities to further develop partnerships

The alternatives were proposed to address several key issues, raised during scoping, which include erosion, resource damage, trail access, security/safety and cultural resources. The IDT developed criteria in the areas of design/construction and program to achieve the purposes of the project and mitigate issue concerns.

The criteria included:



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Design/Construction

Restroom facility (backcountry vault toilet) at each trail head
Adequate parking for east / west trail head
Ability for pedestrian crossings (highway 244 & 16A)
ADA accessibility for a portion of the trail
Sustainable construction
Bus/RV access and parking
No interference with administrative/restricted areas
Protection of cultural and natural resources
Avoidance sensitive areas
Alignments providing options for trail access by difficulty level, multiple distances, guided and self-guided
Quiet soundscapes
Connection with other trails and the City of Keystone
Better opportunity for emergency access
Aesthetically pleasing environment

Program/Operations

Informational kiosk at each trail head
Open all seasons
Day use areas, low profile wayside exhibits and benches
Natural resources and cultural resources in that proximity
Increased ability to secure and actively manage park lands
Educational opportunities for the visitor on their role in protecting resources
Opportunities for local and national volunteer/partners involvement

Based on this iterative process, three alternatives emerged:

- Alternative 1) no action
- Alternative 2) single loop alternative
- Alternative 3) multi-loop alternative (selected alternative).

Selected Alternative and the Environmentally Preferable Alternative

The NPS, in cooperation with the Memorial, has selected Alternative 3, the multi-loop trail as the selected alternative best meeting the objectives of the proposed project. Alternative 3 is the environmentally preferable alternative, meeting the goals of NEPA, which are:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and



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- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Multi-Loop Trail will encompass the Memorial and will provide several shorter sub-loops to allow shorter hikes on the trail and hikes of varying length and difficulty. The main loop, sub-loops, and connecting trails will total approximately 9.8 miles in length. This alternative will also include a horse comfort station to accommodate the “historic” equestrian users on the Blackberry Trail. The Multi-Loop Trail is proposed in phases to reflect priorities and to be built out as funding becomes available. The phases include:

Phase I—Establish the north trail segments, trail head and day use at Presidential Trail

Phase II—Establish Starling Basin Trail and rehabilitate Blackberry Trail, establish Lot 7 underpass and trail head, Profile trail head, and ADA short trail

Phase III—Establish west crosswalk, trail head, parking and connector trails

Phase IV—Establish east crosswalk, trail head, parking and connector trails, trail head south of 244/16A intersection

Phase V—Establish greenway to east boundary, 244/16A crosswalk, east boundary parking, northeast trail and entrance trail head

When all of the phases are complete, there will be a total of 4 crosswalks, 6 parking areas, 6 emergency access points, 7 trail heads, and 7 day use areas. There will be 5 smaller loops with the trail system varying from 0.5 miles to 1.5 miles. The four additional parking areas will create approximately 40 additional parking areas for trail users. The park service will consider some type of registration system for the trail system during the trail design phase.

The proposed trail will be constructed using native materials with the width of the trail ranging from 2 feet to 3 feet, depending on the location. The maximum gradient for trails will be 10% or less and a cross slope of about 5% to route water off the trail surface. Each section of the trail should allow for grade breaks for drainage relief at appropriate intervals for the gradient, soils, slope and ground cover. Each trail head will include basic elements, such as, parking, vaulted toilet, trail sign, bike rack, and day use areas at select locations. No utilities (water or electricity) will be available at any trail head, which will limit the use to daylight hours. Both trail alternatives will provide an opportunity for cultural and natural resources interpretation, through possible audio tour/podcast, low profile wayside exhibits, and ranger-guided and/or self-guided walks.

Other Alternatives Considered

Alternative 1 - No Action Alternative

Under the No Action Alternative, the existing trails would remain and authorized uses and park facilities would continue operation. The existing trails include the 0.6 mile Presidential Trail, the 0.7 mile Blackberry Trail and a social trail south of Old Baldy Mountain. All of the considered alternatives, including the No Action Alternative, will require rehabilitation of the existing Blackberry Trail from the trail head at the parking area down to the boundary of the US Forest Service.

Ongoing maintenance of the existing trails would be required. In particular the existing Blackberry Trail section that connects to the Centennial Trail system within the Black Hills to the Memorial has experienced natural resource damage due to terrain and horse use. NPS in cooperation with the US Forest Service has identified the Blackberry Trail for rehabilitation to protect nearby resources and to



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reduce maintenance. The Blackberry Trail section is the only section within the Memorial that "historically" allows horse traffic.

Alternative 2 - Single Loop Alternative

In the Single Loop Trail Alternative the proposed trail would have encompassed the Memorial property with one large loop (approximately 4.3 miles in length) and connected trails for a total of 6.7 miles, which would have included the existing Presidential Trail. In order for the Single Loop Trail to encircle the Memorial, it would cross Highway 244 in 2 locations (west crosswalk or east crosswalk). Two parking locations were identified in this alternative, which were the existing concession - operated parking facility (1,150 vehicles) and Profile (15 vehicles).

Other Alternatives Eliminated

Additional alternatives were eliminated, which included a loop without crosswalks, allowing bicycles on portions the trail system and prohibiting "historic" horse traffic on the existing Blackberry Trail. The no crosswalk alternative was dismissed by the IDT, recognizing the difficulties in accessibility to the trail by visitors, park personnel and emergency personnel and equipment. Since no crosswalks were proposed in this trail, all access originated from within the park. Another drawback was the inability to access remote regions of the proposed trail, without first returning to the main entrance area of the Memorial.

The Superintendent's Compendium (NPS 2008), states that any type of motorized or non-motorized wheeled vehicles (i.e. bicycles), for the purpose of transporting personal property or persons, on backcountry trails is prohibited. Although no bike traffic is currently allowed in the backcountry at the Memorial, visitors may use Highway 244 to approach the main park entrance on bicycles and park them at the concession-operated parking.

The IDT discussed and rejected the possibility of eliminating horse traffic on the Blackberry Trail, because of historic use and the number of visitors who arrive at the Memorial via the Centennial Trail on their horses.

The Selected Alternative and Significance Criteria

As defined in 40 CFR 1508.27, significance is determined by examining the following criteria:

1. *Impacts that maybe both beneficial and adverse. A significant effect may exist even if the Federal Agency believes that on balance the effect will be beneficial.*

No long-term major adverse or beneficial impacts were identified that require analysis in an environmental impact statement.

Construction of the trail poses possible short-term impacts to the Memorial's ecological and wildlife resources, which are mitigated with best practices for controlling erosion. Beneficial long-term impacts will be the educational and interpretive benefits derived from the use of the trail.

With proper mitigation incorporated in the design and construction of the trail, impact to several areas of the trail will be beneficial when compared to existing trail conditions, which experience the development of social trails outside of the Memorial's supervision.



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Any possible adverse impacts to water resources will be short-term in nature. The long-term impact would be beneficial, using trail construction features, such as a boardwalk or other means, which would not disturb hydrologic or ecological processes and avoid resource damage.

Direct, indirect and cumulative impacts from the Trail usage and access are beneficial to visitors and to communities and the state, which will economically benefit from the increase in visitors and their length of stay. Cumulative impacts will have potential impacts on parking and the need for additional staff with the Memorial, the concessionaire and in the private sector.

Potential adverse impacts to the cultural resources will be an increase in souvenir collection within the Memorial, which is mitigated through education and security. The beneficial cumulative impact will be the easier access throughout the Memorial, which may promote additional scientific and cultural research opportunities.

2. Degree of effect on public health or safety.

Visitors must assume the risk and responsibility for their own safety when hiking the backcountry trails and scenic vistas. Any personal safety impacts due to the increased access to the backcountry areas of the Memorial will be mitigated by posting emergency information at each trail head; including rules and regulation and providing brochures with emergency information, visitor expectations and warnings.

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

Previously recorded archaeological sites or features were noted during a Trail Corridor Survey completed in 2008. As the final design and routing of selected alternative trail is variable within the surveyed corridor, these features will not be impacted by any proposed construction.

Construction of the trail may pose possible short-term impacts to the Memorial's ecological and wildlife resources. These impacts will be mitigated with the use of hand tools during construction, where possible. Other precautions will be taken to minimize any disturbance to the area.

There are no prime farmlands within the boundaries of the Memorial.

Two wetland areas are located within the Memorial boundaries. Any possible adverse impacts will be short-term in nature. To the greatest degree possible and in accordance with NPS Management Policies, wetlands will generally be avoided during construction of the trail. The long-term impact will be beneficial, using trail construction features, such as a boardwalk or other means, which would not disturb hydrologic or ecological processes.

4. Degree to which effects on the quality of the human environment are likely to be highly controversial.

There were no highly controversial effects identified during either preparation of the environmental assessment or during the public review period which began January 15th through February 15, 2009.



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5. *Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.*

There were no highly uncertain, unique, or unknown risks identified during either preparation of the environmental assessment or during the public comment period.

6. *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 neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

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

There are no known related actions that would lead to cumulatively significant impacts. The selected alternative, along with known impacts from other actions in the past, will not cause a significant cumulative impact.

8. *Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historic resources.*

The entire Memorial is on the National Register of Historic Places (NPS 1980). As the final design and routing of the selected alternative trail is variable within the surveyed corridor, no previously recorded archaeological sites or features noted during the trail corridor survey will be impacted by any proposed construction. Given these survey results and the potential for avoidance of cultural resources in the final routing of the trail, and mindful of the potential for the inadvertent discovery of buried cultural material, the selected alternative will not impact any known cultural resources.

The South Dakota State Historic Preservation Office (SHPO) was contacted by letter dated April 28, 2009. Additional information was provided to SHPO on June 1, 2009 and July 14, 2009. Based on information provided in the survey report "A Park-Wide Cultural Resources Survey of Mount Rushmore National Memorial, Pennington County, South Dakota: A Final Report of the Class III Reconnaissance and Intensive Archeological Surveys, 2006-2007," prepared by Dr. Brian L. Molyneaux, and the additional information provided by the Memorial, SHPO concurred with the finding of No Adverse Effect, providing the following stipulations:

Stipulation 1) all historic properties are to be avoided by construction activities. If any historic properties cannot be avoided, please submit complete evaluation of the site for SHPO comment.

Stipulation 2) this concurrence only applies to the Back Country Trail project and not any other projects referenced in Dr. Molyneaux's report.

Stipulation 3) activities occurring in areas not identified in the request will require the submission of additional documentation pursuant to 36 CFR Part 800.4. If historic properties are discovered or unanticipated effects on historic properties are found after the agency official has completed the Section 106 process, the agency official shall avoid, minimize or mitigate the adverse effects to such properties and notify the SHPO/THPO and Indian tribes that might attach religious and cultural



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significance to the affected property within 48 hours of the discovery, pursuant to 36 CFR Part 800.13.

9. *Degree to which the action may adversely affect an endangered or threatened species or its critical habitat.*

There are no known federally listed wildlife species that reside within the Memorial. No critical habitat is known to exist within the Memorial. The US Fish and Wildlife Service, Pierre, SD, was consulted by letter dated March 6, 2008. The letter was stamped and signed March 13, 2008, indicating they had reviewed the letter and have NO OBJECTION to this proposed project. .

10. *Whether the action threatens a violation of federal, state, or local environmental protection law.*

The selected alternative will not violate any federal, state or local environmental protection laws.

Mitigation

In order to minimize the environmental impacts associated with the selected alternative, the following measures will be taken:

- Best Management Practices will be incorporated into design and construction of the trail to reduce erosion and sedimentation.
- To the greatest extent possible, wetlands will be avoided during construction of the trail. Should any materials be discharged into the stream tributaries, a US Army Corps of Engineers 404 Permit will be obtained. A general storm water permit may be required.
- Engineered structures (boardwalks, bridges, elevated walkways) will be incorporated into design and construction to reduce the impact to water resources.
- If any archaeological resources are discovered during construction of the trail, all work will stop, and the appropriate agency personnel notified.
- If historic properties are discovered or unanticipated effects on historic properties are found after the agency official has completed the Section 106 process, the agency official shall avoid, minimize or mitigate the adverse effects to such properties and notify the SHPO/THPO and Indian tribes that might attach religious and cultural significance to the affected property within 48 hours of the discovery, pursuant to 36 CFR Part 800.13.
- The Memorial's Resource Management Division and the Northern Great Plains Network Inventory and Monitoring Program will monitor resources at the Park to ensure the continued health of the Memorial's ecology.
- Emergency information will be posted at each trail head; including rules and regulation and providing brochures with emergency information, visitor expectations and warnings.



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Public Involvement

Early in the development of the EA, the Memorial hosted an Open House in Rapid City on March 13, 2008 and in Pine Ridge on March 20, 2008, to discuss the proposed project. The Memorial provided an overview of the trail concept and presented information on the unique natural resources in the Memorial and on the National Environmental Policy Act process. A total of 68 attended the three sessions. The public had the opportunity to complete comment cards at the meetings or mail them to the Memorial. They also had the opportunity to post comments on the PEPC website between April 1, 2008 and April 30, 2008. A total of 43 comments were received and a summary is included in Appendix B of the EA.

The EA was posted on the PEPC website on January 5, 2009 inviting comments until February 15, 2009. A copy of the EA was placed in the Rapid City and Keystone libraries, and at the Information Center at Mount Rushmore National Memorial. A notice of availability was published on January 4, 2009 in the Rapid City Journal.

On February 6, 2009 the Memorial hosted a second Open House to review the contents of the EA, including the proposed alternatives, the selected alternative, the affected environment and the environmental consequences. The Memorial also discussed the next steps in the proposed project. Once again the public had the opportunity to complete comment cards at the meeting or mail them to the Memorial. They also had the opportunity to post comments on the PEPC website between January 5 and February 15, 2009. A total of 47 comments were received and are attached to the FONSI.

Scoping letters were sent on March 6, 2008 to federal, state and tribal governments to inform them of the proposal. Ten state and federal agencies responded. These comments are included in the EA in Appendix B.

Impairment of Park Resources

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the selected alternative will not constitute an impairment to critical resources and values of the Park. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment, relevant scientific studies, the agency and public comments received and the professional judgment of the decision-maker in accordance with the National Park Service's Management Policies (2006). The Selected alternative will not result in any adverse impact to Park resources. Overall, the trail project results in benefits to Park resources and values, appreciation of the cultural and natural resources, opportunities for their enjoyment, and it does not result in their impairment.

Conclusions

The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environment impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, or other unique characteristics of the region. There are no unmitigated adverse impacts on sites or districts listed in or eligible for listing in the National Register of Historic Places. No uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or



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elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on this information, it has been determined that an EIS is not required for this project and will not be prepared.

Recommended:

Gerard Baker 7/27/09
Gerard Baker, Superintendent Date
Mount Rushmore National Memorial

Approved:

David N. Given 7/31/09
David N. Given Date
Acting Midwest Regional Director