



**National Park Service
U.S. Department of the Interior**

**Mount Rushmore National Memorial
South Dakota**

FINDING OF NO SIGNIFICANT IMPACT

**Mount Rushmore National Memorial
Independence Day Holiday Fireworks Event**

Recommended:

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Approved:

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FINDING OF NO SIGNIFICANT IMPACT
Mount Rushmore National Memorial Independence Day
Holiday Fireworks Event 2026

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (2026 EA) to examine alternative actions and environmental impacts associated with a proposed fireworks event (project) at Mount Rushmore National Memorial (the Memorial).

NPS has prepared a new EA (2026 EA) to evaluate environmental impacts associated with new information that has emerged since completion of the 2020 Mount Rushmore Independence Day Fireworks Event Environmental Assessment (2020 EA). Because the 2020 Finding of No Significant Impact (FONSI) stated that fireworks displays could occur in future years and the 2020 EA's analysis included that assumption, the 2026 EA only supplements portions of the 2020 EA to address the relevant new information. The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the original 2020 EA and FONSI, which are incorporated by reference, and their associated decision file, as well as the 2026 EA, and its associated decision file. To the extent necessary, relevant sections of each EA are incorporated by reference below.

On February 24, 2026, the Department of Interior (DOI) published its final NEPA Implementing Regulations (regulations; 91 Fed. Reg. 8738) and updated its NEPA procedures at 516 Department Manual (DM) 1: DOI Handbook of NEPA Implementing Procedures (Handbook). The 2020 EA was prepared following the then-current NEPA procedures that predated the current regulations and Handbook. While the 2026 EA incorporates by reference the 2020 EA, the 2026 EA and FONSI are consistent with 2026 regulations and Handbook.

The development of the 2026 EA was prepared in response to a request from the State of South Dakota to conduct a fireworks event at the Memorial under a special use permit (SUP) issued by the NPS. The purpose of the event is to provide an opportunity for the public to celebrate the spirit of Independence Day in a manner that promotes enjoyment while ensuring public safety and resource protection.

Two alternatives were analyzed in the 2026 EA. Under Alternative 1, the Memorial would permit and host an Independence Day celebration, including a fireworks display and other performances, on the evening of July 3, 2026, similar to the event hosted in 2020, and could permit similar events in subsequent years. Under Alternative 2 (the no action alternative), a fireworks event would not be permitted, and activities similar to those the Memorial hosted from 2010 to 2019 and 2021 to 2025 would occur again in 2026. Three additional alternatives were considered, including hosting the event on July 4th, using alternative launch sites, using drones, and offering a laser light show, but these alternatives were dismissed from detailed study.

SELECTED ALTERNATIVE

The NPS has selected to implement Alternative 1 – Issue a Special Use Permit to Host an Independence Day Fireworks Event (selected alternative). Under the selected alternative, the Memorial will permit and host an Independence Day celebration, including a fireworks display and other entertainment, on the evening of July 3, 2026. Similar events could be permitted in subsequent years by the Memorial, assuming conditions and impacts remain as described in the 2026 EA.

The event will include 15 to 30 minutes of fireworks and proximate pyrotechnics displays that will illuminate the sculpture's carved faces of Presidents Washington, Jefferson, Roosevelt, and Lincoln. Other types of performances will occur before the fireworks, such as music, speeches, and reenactments. A military flyover, depending on aircraft availability, may also occur. The event may be filmed for viewing audiences and broadcast live or on delay.

Logistics for the event are described in the 2020 EA on page 5, and potential launch sites are described in the 2020 EA, pages 6 through 8.

Before the event, the NPS will work with partner agencies, including but not limited to the state of South Dakota, local communities, South Dakota Highway Patrol, as well as the fireworks contractor and staff, to develop the following:

- A plan for event staging, ignition, and demobilization. All launch locations will be closed to public access for a predetermined time before and after the event, as fireworks are staged and cleaned up. Fireworks contractor staff will monitor the event for any unexploded shells, spot fires, and other concerns.
- A wildland fire response plan. The NPS and fire officials will establish a quick response wildland fire team to respond to any unplanned ignitions.
- A plan to address event traffic control, visitor management, and emergency response. The Memorial will likely be closed to normal visitation for all or part of the day on July 3, 2026.
- A Unified Command incident management team and a Go/No-Go checklist. The event will be conditioned on appropriate weather, security, and wildland fire conditions prior to the event.

The Memorial will protect vehicle petroleum storage both from the fireworks displays and from any resulting wildfire by clearing and treating fuels in the immediate vicinity and stationing rapid response teams/assets in these locations (point protection and prepositioning resources). Additional conditions and mitigations may be required through the NPS permit issued for the event. Any suppression activities would be consistent with the Memorial's Fire Management Plan. Suppression activities would seek to control the spread of wildfires through either direct or indirect attack, relying preferentially on the use of natural barriers, backfire/burnout techniques, and water or foam firelines to reduce damage from suppression actions; aerial retardants could be used if necessary, with a buffer to protect the sculpture, streams, or wetlands.

The NPS has collaborated with the United States Geological Survey (USGS) to conduct water quality and soil monitoring at the Memorial since 2011. Data from 2011 to 2015 was used to develop a USGS report on perchlorates and other contaminants (USGS 2016), and the

monitoring techniques developed for that report have been used to maintain current data on perchlorate levels in the Memorial groundwater (see 2026 EA Section 3.3 Environmental Contaminants). If future monitoring following the 2026 event shows that conditions have changed meaningfully from information presented in the 2026 EA, additional analysis may be necessary to evaluate future events.

In May 2021, a Traditional Cultural Survey was conducted in the Memorial by representatives of traditionally associated Tribes, as a result of commitments made through consultation regarding the 2020 fireworks event. This survey recorded approximately 90 previously undocumented cultural sites within the boundary of the Memorial. Since that survey NPS has continued to consult with associated Tribes regarding effects on these resources, primarily in the context of pre- and post-prescribed fire surveys using Traditional Cultural Specialists. NPS has also consulted with associated Tribes specifically on the planned 2026 fireworks event (see 2026 EA Section 3.4 Cultural Resources, and Chapter 4 Consultation and Coordination).

MITIGATION MEASURES

NPS will comply with the following reasonable and prudent measures to minimize incidental take pursuant to ESA Section 7 formal consultation:

1. By May 15, 2026, the NPS, in cooperation with the Service, will develop a monitoring plan that will measure the impact of the Proposed Action on NLEB and TCBs as specified in (50 CFR §402.14(i)(4)). The plan will describe specific actions to measure sound, light, and bat activity levels at and around Mount Rushmore National Monument (MORU) before, during, and after the July 2026 fireworks event. Monitoring would be done at MORU and a nearby control location. The resulting data and analysis will provide the best available information to quantify how firework displays affect reproducing bats. The mutually agreed plan will be developed by working with sound, light and bat experts including but not limited to NPS and Service staff.
2. NPS, in cooperation with the Service, will assess the impact of the Proposed Action on NLEB and TCBs by monitoring sound, light, and bat activity levels within the Action Area and a control site before, during, and after the July fireworks event. This provides site-specific and contemporary information to better understand how firework displays affect reproducing bats. Results of the monitoring plan will be submitted to the Service at a mutually agreed upon date identified during the development of the monitoring plan.

In addition, NPS will comply with the following terms and conditions, which implement the reasonable and prudent measures. NPS will include full implementation and adherence to the conservation measures as a condition of any permit or contract issued for this action.

- **TC 1:** Document sound (frequency and amplitude) and light levels at multiple mutually agreed upon locations in and around MORU before, during, and after July 3, 2026 fireworks displays that will provide an adequate representation of the temporal and spatial variation in sound and light conditions that may be relevant to bats. Document and

record wind, temperature and humidity levels at appropriate locations and intervals that will help interpret changes in bat activity and sound levels.

- **TC 2:** Monitor bat activity levels and document species present in and around MORU before, during and after the July 2026 fireworks event to provide a reasonable representation of variation in the area. Monitoring should be conducted in 2026 to show conditions before, during, and after fireworks displays. Bat monitoring should occur at or nearby locations where NLEB have been previously documented and include locations from which sound and light are being measured. Final methods would be mutually determined between the NPS and Service.
- **TC 3:** A progress report or meeting update will be provided or conducted by October 30, 2026. Data and a final report will be provided by March 31, 2027 or another mutually agreed upon date.

BASIS FOR THE DECISION

Alternative 1 was selected because it best meets the project's purpose and need of providing an opportunity for the public to celebrate the spirit of Independence Day in a manner that promotes enjoyment, while ensuring public safety and resource protection. It also meets the intent of the 2025 Memorandum of Agreement (MOA) between the DOI and the State of South Dakota to explore ways to return fireworks to the Memorial for a 250th anniversary celebration of the signing of the Declaration of Independence.

The NPS also evaluated a No Action Alternative, which would involve an Independence Day celebration without fireworks. Alternative actions considered but dismissed from full analysis for technical or safety reasons included hosting a laser light show or drones as an alternative to fireworks, using alternative launch sites, and hosting the event on the 4th of July instead of the 3rd of July. The dismissed alternatives would also not meet the intent of the 2025 MOA. A detailed discussion of alternative elements dismissed from full analysis can be found in Section 2.3, Alternatives Considered but Eliminated from Detailed Study, in both the 2020 EA and the 2026 EA.

SIGNIFICANCE CRITERIA REVIEW

A description of all potential environmental effects associated with the selected action and no action alternative is included in the 2020 and 2026 EAs. Consistent with the Handbook, Section 1.2(b), the NPS evaluated the significance of the selected action, identified as the proposed action in the 2026 EA, by analyzing the potentially affected environment and the degree of the effects of the selected action. Significance is determined solely in relation to reasonably foreseeable adverse effects. The degree of effect is considered by evaluating both short-and-long term effects, both beneficial effects and adverse effects, effects on public health and safety, economic effects, and effects on the quality of life of the American People. The NPS only completes a significance determination for the selected action and does not determine the significance of unselected alternatives.

The 2026 EA discloses the reasonably foreseeable effects of the selected action from wildfire and environmental contaminants from fireworks, including the combined effects of the selected action with those of past, ongoing, and anticipated future actions on the park's cultural resources, and threatened and endangered species. While other park resources may experience some effects, those effects are minimal and were determined not to warrant detailed analysis in the 2020 and 2026 EAs. Accordingly, these resources are not discussed further here, as the anticipated effects are so minor that they have no potential to reach a level of significance. For a detailed description of impact topics considered but dismissed, see Appendix A of the 2020 EA, and Section 2.3, Alternatives Considered but Eliminated from Detailed Study of the 2026 EA.

Potentially Affected Environment

Mount Rushmore was established as a national memorial to preserve, protect, and interpret the unique mountain sculpture of four presidents: George Washington, Thomas Jefferson, Theodore Roosevelt, and Abraham Lincoln. The entire Memorial (1,278 acres) is listed in the National Register of Historic Places (National Register) as a Historic District (District), and several unique cultural features are considered contributing resources of the District. These include the sculpture itself, the Hall of Records, the talus slope beneath the sculpture, and several historic structures in the developed area of the Memorial. The Memorial's natural resources also contribute to its unique character. Its vast pine forest constitutes the second largest old growth ponderosa pine forest in the Black Hills, and the Memorial's wetlands and ephemeral streams create habitat for a variety of species. The Memorial is also surrounded by lands with unique designations, including the Black Elk Wilderness and Norbeck Wildlife Preserve.

1. Short and Long-term Beneficial and Adverse Effects

As described in the 2026 EA in Chapter 3, the selected alternative has the potential for adverse impacts associated with wildfire, environmental contaminants, cultural resources, and threatened and endangered species. However, no potential for significant adverse impacts was identified.

Wildfire

The 2026 EA included an analysis of the potential for an accidental wildfire ignition to occur as a result of the fireworks discharge, and the potential for any wildfire to spread. Since 2020 there have been two important fire events that have reduced fuel conditions in the area of the proposed fireworks show. The NPS and a Unified Command incident management team will assess wildfire risk in the days leading up to the July 3rd event. A Go/No-Go decision tree will be created and utilized to ensure conditions are appropriate for the event to proceed in terms of wildfire ignition. The analysis in the 2020 and 2026 EAs included information from the Wildland Fire Decision Support System (WFDSS), which is designed to predict how a fire will burn (direction, speed, spread, intensity) once ignited, under a set of weather conditions. The analysis simulated an average year and a dry year and found that in an average year any accidental ignitions are likely to be contained as small spot fires with only negligible environmental effects. This has been the experience of the Memorial during previous fireworks events from 1998 through 2009 (with no show happening in 2002 due to elevated fire risk), and in 2020. In a dry year there exists the possibility of a larger wildfire with observable impacts on vegetation, fish, aquatic invertebrates, wildlife, soils, water quality, and the surrounding landscape generally. The Black Hills are a fire-adapted ecosystem, and the types of effects that could result in the unlikely

event of an escaped wildfire are consistent with the effects associated with naturally occurring wildfire. Because the NPS will assess wildfire risk prior to the event and ensure conditions are appropriate before proceeding, any ignitions that occur are expected to be small and contained, and given the past history of no significant wildfire events from similar ignitions, the proposed action will not result in significant impacts.

Environmental Contaminants

The 2020 EA included an analysis of the effects of fireworks-associated environmental contaminants including perchlorates (the most important concern), nitrates, thiocyanate, and various metals; the 2026 EA updated this analysis with new perchlorate monitoring data. Water quality analysis shows that past fireworks events have not contributed to thiocyanate contamination but have contributed to perchlorate contamination and may have contributed to nitrate contamination. Soil analysis shows that past fireworks events contributed to copper and lead contamination in the immediate area of the previous launch location and may have contributed to elevated levels of 20 additional metals in soils elsewhere in the Memorial. Monitored levels of nitrates in surface and groundwater remain well below the Environmental Protection Agency (EPA) maximum contaminant level (MCL) for drinking water.

Regarding perchlorates, measured levels of perchlorate attenuated after fireworks discharges were ceased in 2009 and have again declined after a spike following the 2020 fireworks event (as predicted in the 2020 EA). The analysis in the 2026 EA therefore concludes that future fireworks events are likely to have similar effects, with perchlorate levels gradually increasing in surface and groundwater after each event, then decreasing over time if fireworks events are paused.

Perchlorate exposure at sufficient concentrations can impair thyroid function, but these effects occur at concentrations considerably higher than those measured in the Memorial. EPA initiated a rulemaking in January 2026 to establish an enforceable MCL at one of three potential levels (20 µg/L, 40 µg/L, or 80 µg/L). These provide some useful context relative to measured perchlorate levels in Memorial groundwater: a single fireworks event could cause measured perchlorate levels to reach their most conservative potential standard (20 µg/L) but would be unlikely to reach their second proposed MCL (40 µg/L). Likewise, events occurring over multiple years (similar to the events held from 1998-2009) may eventually result in accumulated perchlorate levels exceeding 40 µg/L but would probably not exceed the most permissive standard (80 µg/L). In addition, perchlorate can be removed from drinking water with reverse osmosis systems, and these systems have been successfully employed at some residences in the Memorial where the water is used as a year-round drinking water source.

Similar effects can occur to wildlife from ingestion of sufficient quantities of perchlorate and although some individual animals or plants may be affected, effects at the population level are unlikely. Although levels of copper and lead in soil exceeded the NPS ecological screening values for birds and mammals in previous USGS sampling results, these high levels were found only in a localized area, at the sample site closest to the former fireworks launch site.

Under the selected alternative, monitoring would continue and would allow for analysis of water and soil samples before and after the 2026 fireworks event (and potential future events). Additionally, the fireworks contractor would be required to thoroughly remove fireworks debris

and unexploded ordnance, which would greatly reduce the introduction of contaminants in environmental media, and would be encouraged to use cleaner, more completely burning fireworks than those used in the past.

Given the proposed monitoring measures, the limited and localized anticipated effects of some contaminants, the likely consistency of perchlorate levels with proposed EPA drinking water standards and the fact that any drinking water issues can be addressed by ongoing and effective reverse osmosis treatment, and the measures to ensure cleanup and recovery of fireworks debris, human health and population-level ecological effects from perchlorate, nitrate, thiocyanate, and metals are not expected to occur. The effects of environmental contaminants therefore will not have a significant effect on the environment.

Cultural Resources

The selected alternative has the potential to cause both direct and indirect impacts on contributing resources to the historic district, especially combustible resources such as buildings, and the cultural landscape, including vegetation, natural systems, views and vistas, and to traditional values of associated Tribes. The few significant known tangible archeological resources within the Memorial would not likely be impacted by fireworks or wildfire directly because of their nature and location but could be affected by wildfire response. These effects would be avoidable using specific response measures (see 2026 EA Section 3.2, Wildfire for additional information on the impacts of wildfire).

During consultation on the 2020 EA, Tribes questioned the adequacy and completeness of the existing park-wide archeological survey data (see 2020 EA Chapter 4). Tribes stated at that time that additional resources (both tangible and intangible) may be located in the Memorial that were not yet documented. To address this concern, a Traditional Cultural Survey was completed in May 2021. This survey documented approximately 90 previously undocumented cultural sites within the boundary of the Memorial. The park has subsequently worked with Traditional Cultural Specialists to apply a similar survey process to the Starling Basin prescribed burn in September 2025. This involves both pre- and post-burn surveys and proposed mitigation actions appropriate to the resource types identified in a survey. This approach will be applied to additional planned burn events, and similar post-burn surveys and mitigations could be applied to an unplanned wildfire event.

Tribes have indicated that they consider fireworks an adverse effect to the traditional cultural property and traditional cultural landscape of the Black Hills, regardless of any survey results, but have not identified how the event would diminish the characteristics of the historic property that qualify it for inclusion in the National Register. Noise and light from fireworks discharge could disrupt individuals engaged in traditional cultural ceremonies at the time of the event. However, potential auditory and visual effects to tribal members conducting ceremonies after dark would be short term (15-30 minutes) and would be similar in duration and impact to other fireworks displays conducted in the local area during the same weekend.

A fireworks malfunction within the Hall of Records area could impact the walls or entrance to the Hall of Records. However, elevating a platform above the Hall of Records, as described in the selected alternative, or using different launch locations or other protective measures, would reduce the potential for these impacts. Additionally, the selected alternative does not allow for

launching fireworks from the top of the sculpture itself, or from the Indian Camp cultural site, for protection of cultural resources and values.

Under the selected alternative, the unique characteristics of the Memorial would be protected. Fireworks would not be launched from the top of the sculpture (which could cause direct impacts to this unique resource), and fire-retardant material would be used at launch sites to protect the surfaces beneath. If the fireworks display were to ignite a wildfire, the most likely wildfire scenario (predicted by WFDSS modeling) would be small, easily controlled, and confined entirely to the Memorial. Additionally, effects from the release of environmental contaminants would be mitigated through measures to ensure cleanup and recovery of fireworks debris and monitoring to ensure early detection of any contamination. Impacts on unique resources of the Memorial, and on unique lands adjacent to the Memorial, therefore would not be significant.

The integrity of National Register listed properties and other cultural resources would not be diminished by actions under the selected alternative, and the NPS has determined that the undertaking would have no adverse effect to historic properties under Section 106 of the National Historic Preservation Act. The South Dakota State Historic Preservation Office (SHPO) concurred with this assessment on September 10, 2025.

Due to the short-term nature of the fireworks display, the mitigation measures to protect resources from wildfire and wildfire response activities, the tribal cultural survey to protect newly-documented sites, the commitment to further consult with Tribes, and the selection of appropriate launch sites, the project will not have a significant effect on the cultural resources.

Threatened and Endangered Species

The 2020 EA included an analysis of the effects of fireworks on wildlife, but threatened and endangered species were dismissed as an impact topic. The 2026 EA carried forward this impact topic based on new information and changes to listed species, such as uplistings. NPS prepared a Biological Assessment (BA) in accordance with Section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*), and submitted the BA to U.S. Fish and Wildlife Service (USFWS) in November 2025. This BA evaluated the potential impacts of the proposed 2026 Independence Day Holiday Fireworks Event on seven federally-listed threatened, endangered, or proposed species within the project's action area. The BA determined the event would have no effect on three species (Leedy's roseroot, rufa red knot, and Suckley's cuckoo bumble bee), no jeopardy on two species (monarch butterfly and western regal fritillary), and potential adverse effects on two species (northern long-eared bat (NLEB) and tricolored bat (TCB)). Peregrine falcons are a South Dakota state-threatened species and was not included in ESA Section 7 consultation. There are currently no known nesting sites in the Memorial; however, if a nesting site is discovered within 0.25 miles of the launch site, additional consultation with South Dakota Department of Game, Fish, and Parks would occur.

In March 2026, USFWS produced a Biological Opinion ((BO), 2026 EA, Appendix A) accepting NPS's determinations on Leedy's roseroot, rufa red knot, Suckley's cuckoo bumble bee, monarch butterfly, and western regal fritillary without a requirement for concurrence or additional analysis. In the BO, USFWS concurred with NPS's finding of potential adverse effects on two species (NLEB and TCB). USFWS also concurred with NPS's no jeopardy finding and issued an

incidental take permit contingent on mitigation measures focused on monitoring bat activity, noise, and environmental contaminants.

Effects to the monarch butterfly and western regal fritillary are expected to be localized, temporary, and not likely to result in population-level consequences.

Effects to the NLEB and the TCB were assessed based on species ecology, timing of the event, and the nature of the activities (e.g., fireworks, aircraft flyovers, amplified sound, and lighting). The proposed action at the Memorial is expected to expose NLEBs to several stressors, with fireworks noise posing the greatest risk, particularly to pups. While adults may experience temporary disturbance, such as flushing from roosts, these effects are generally not long-term. Volant pups face higher risks, including stress, separation from mothers, injury, and predation; these impacts would not be discountable if maternity roosts are active during the event. However, population level effects or jeopardy to the continued existence of the species would not result. Artificial light may delay emergence and reduce juvenile growth, though impacts are expected to be similar to existing conditions. Fireworks could introduce contaminants like perchlorate and metals into water systems, but short-term exposure and dilution make severe effects unlikely. Wildfire risk from the event is minimal, though a fire could severely impact habitat and prey availability. Overall, the USFWS determined the action is likely to adversely affect NLEB and issued an incidental take permit contingent on mitigation measures, including monitoring bat activity, noise, and contaminants. TCBs are expected to experience similar effects, primarily temporary and localized, without population-level consequences. However, if the TCB becomes listed before the event, the action would also be considered likely to adversely affect individuals, and USFWS has concurred with this determination and applied mitigation requirements similar to those established for the NLEB. Overall, while the NLEB and TCB would be affected by the selected action, the impacts are primarily short-term, would not create population-level effects or cause jeopardy, and are not significant.

2. Effects on Public Health and Safety

Although there are potential adverse effects on human health and safety, the selected alternative includes mitigation measures to limit the potential and degree of these effects. The NPS, with its partners, will develop the following: a plan for event staging, ignition, and demobilization. The NPS, State of South Dakota, and local law enforcement and emergency response officials are developing a traffic and visitor management plan, which will include emergency egress procedures. There will be a Unified Command incident management team established prior to the event to ensure safety and security of visitors, Memorial staff and contractors, and emergency response personnel. Risks to visitors from fireworks themselves are very limited; event management will incorporate all emergency egress considerations. In addition, visitation will be limited to not quite half the number of visitors that were ticketed for the 2020 event, which would allow for easier egress conditions should an emergency arise.

A Go/No-Go checklist will also be used to review and confirm any safety or security concerns on the day of the event. The types of criteria included in the Go/No-Go checklist are expected to include:

- Public safety criteria, such as:
 - adequate egress is available;
 - visitors are in safe locations;
 - adequate resources are available for emergency response, if needed
- Fire condition criteria, such as:
 - fire preparedness level;
 - burning index;
 - fuels and moisture conditions;
 - wind and weather conditions
- Fireworks operator systems are functioning properly

A final Go/No-Go checklist will be in place prior to the event and will be followed to maintain the security of the event and its attendees.

The 2026 EA relies on best available data regarding resource impacts augmented by knowledge of the effects of hosting a similar event in the recent past. The degree of uncertainty and risk associated with the selected alternative is low, as prior fireworks events have occurred at the park and resulting impacts are known and are not significant. The impacts of the selected alternative are anticipated to be similar to prior events.

In terms of the data used to complete the analysis, the 2026 EA uses a standardized model (WFDSS) to assess fire risk and examine potential wildfire scenarios. The purpose of the model is to reduce uncertainty surrounding prescribed fire outcomes. The model was used to assess the probability of potential wildfire effects, and the analysis found the risk of larger wildfire events to be both low and avoidable using the same decision framework used for prescribed fire activities.

The impacts of environmental contaminants are also well understood, as documented in a USGS study (USGS 2016) that concluded fireworks contribute to elevated perchlorate levels. Several years of monitoring also provided insight into the presence of other contaminants and the attenuation of perchlorate levels over time. Although some uncertainty exists in terms of the rate at which environmental contaminants will accumulate in environment, the effects of the project on the human environment are not highly uncertain and do not involve unique or unknown risks.

Any potential human exposure to environmental contaminants from fireworks, including perchlorate, nitrate, thiocyanate, and metals, at the Memorial, would be expected to occur through the drinking water supply. The drinking water at the Memorial is monitored and treated for potential contaminants. Most visitors do not have regular and ongoing exposure to the Memorial drinking water. Perchlorate exposure at sufficient concentrations can impair thyroid function, but these effects occur at concentrations considerably higher than those measured in the Memorial. The EPA initiated a rulemaking in January 2026 to establish an enforceable MCL at one of three potential levels (20 µg/L, 40 µg/L, or 80 µg/L). A 2026 fireworks event could cause measured perchlorate levels to exceed the most conservative potential MCL, but NPS has successfully used reverse osmosis filters in staff housing to mitigate any potential exposure for year-round residents. Given the limited potential exposure for visitors, proposed monitoring measures, and current treatment methods utilized at the Memorial, environmental contaminants are not expected to affect human health. In summary, the proposed action will not result in

significant impacts to public health and safety.

3. Economic Effects

In Appendix A of the 2020 EA, NPS considered but dismissed socioeconomic impacts on local communities, Memorial visitation, and the Memorial concessioner. Regarding effects on local communities, the dismissal found that the event on July 3rd was unlikely to create conflicts with other planned events in the region, and that appropriate planning for traffic management would resolve previous traffic congestion problems near the Memorial entrance. Additional limitations on the size of the 2026 event and parking restrictions near the entrance are expected to further resolve concerns about traffic congestion.

Regarding visitation, the reasoning applied to the 2020 event also applies to the 2026 event: visitors adapt to restricted access on July 3rd by shifting their visits to other days. During the 2026 event, visitation numbers would be lower overall, with a projected number of 4,800 total participants (not including support staff), but visitors would stay for a longer duration of up to 8 hours. Although prior fireworks event SUP denials were based on reduced visitation due to a full-day closure, those events did not account for the extended visitor stays expected with this year's event. With 4,800 participants staying on site for 8 hours, the visitation would be different in nature but still provide a comparable level of visitor enjoyment and have similar impacts on NPS activities and administration.

Regarding concessioner effects, the July 3rd event has not been found to affect overall annual visitation, and the concessioner is expected to have strong sales during the ticketed event. Due to expected restrictions and screening, participants would not be allowed to bring large bags, coolers, or other outside food or beverages into the event area. During the 8 hours that participants are expected to be at the Memorial, they will be purchasing all food and beverages from Xanterra's operations, resulting in a comparable level of business operations.

In summary, the proposed action may cause temporary adverse impacts to visitors due to crowding and congestion but are not expected to be significant adverse because they are temporary in nature, have been addressed through planned traffic management, and visitors displaced by the July 3rd event are likely to shift their visit to another day. The proposed action would also not interfere with other planned activities that generate revenue for local businesses.

4. Effects on the Quality of Life of the American People

The 2020 EA dismissed visitor experience as an impact topic for analysis. While the July 3rd closure would disrupt regular visitor use on the day of the event, it is anticipated most visitors would adapt to the closure by visiting on a different day, and Memorial visitation would correspondingly increase in the days surrounding the event. Compared to total daily visitors (28,000 daily over a three-year average), this is a minor displacement effect. In addition, visitors to the fireworks event would have a unique experience at the Memorial and, if broadcasted, a large television or online audience would as well. Therefore, adverse impacts on the visitor experience would be minimal and not significant.

Visitor viewing of the sculpture may be impacted during event preparation, as the fireworks contractor transports materials to the launch sites. In addition, the Presidential Trail and the Wrinkled Rock Climbing trailhead, located northwest and outside of the Memorial, would be closed to the public before the proposed event to prevent access by foot into the Memorial and avoid potential safety issues before, during, and after the fireworks display. The NPS would minimize potential adverse impacts on visitor experience by posting the closure in advance and messaging through multiple outlets. Some visitors may experience crowding and wait times during security screening and while entering and exiting the event, but these effects will be mitigated by the Memorial's efforts to raise awareness about the event.

At the same time, Independence Day is the annual commemoration of the birth of the United States of America and the ideals on which the Nation was founded, including life, liberty, the pursuit of happiness, and equality. An event commensurate with these founding values provides opportunities to celebrate the Nation's founding fathers and the spirit of democracy, and provide an iconic backdrop for the enjoyment and education of a diverse local, national, and international audience.

Decision

The State of South Dakota has requested a special use permit for a fireworks display at Mount Rushmore National Memorial on July 3, 2026. Unlike prior applications denied under 36 CFR 2.50(a), NPS has determined that the proposed event will not unreasonably interfere with park operations, impair concession services, or create significant conflicts with other uses. In recognition of America's 250th anniversary and based on this determination, NPS concludes the criteria are satisfied. Based on the information in the 2026 EA, incorporating the 2020 EA by reference, and associated decision file, the NPS has selected Alternative 1 for implementation, and it is my determination that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) will not be required. Lastly, the NPS certifies that it has considered all relevant information raised during the NEPA process and that the NEPA process is closed (516 DM 1 Handbook § 4.1).

The 2026 EA anticipates future fireworks events at the Memorial. The impacts are included in the analysis and are not expected to have significant effects. Future events are predicated on monitoring data collected as part of this project. If monitoring shows that conditions have changed meaningfully from information presented in the 2026 EA, additional analysis may be necessary to evaluate future events. Individual events will be subject to permitting, visitor and traffic management planning, and utilization of a Go/No-Go determination to ensure conditions are appropriate for the event and would not result in significant impacts.

APPENDIX A: NON-IMPAIRMENT DETERMINATION

INTRODUCTION

As described in National Park Service (NPS or Service) 2006 Management Policies, § 1.4.4, the National Park Service Organic Act prohibits the impairment of park resources and values. Guidance for Non-Impairment Determinations and the NPS NEPA Process (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a non-impairment analysis for the impacts to Mount Rushmore National Memorial (the Memorial) from the Independence Day Holiday Fireworks Event and determined that it will not result in impairment of park resources, or in unacceptable impacts as described in § 1.4.7.1 of the 2006 NPS Management Policies. An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS Management Policies 2006, Section 1.4.5). To make an impairment determination, the NPS must evaluate the following:

An impact on any park resource or value may constitute impairment, but an impact will be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park’s general management plan or other relevant NPS planning documents as being of significance (NPS Management Policies 2006, Section 1.4.5).

Resources and values subject to the non-impairment standard include (NPS Management Policies 2006, Section 1.4.6):

- the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;

- the park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established (NPS Management Policies 2006, Section 1.4.6).

Fundamental resources and values for the Memorial are identified in the Memorial’s foundation document. Relevant ones are discussed in further detail in the analysis below and include:

1. **The Sculpture.** The sculpture on the face of Mount Rushmore is a unique work of art and impressive engineering achievement that communicates the story of the birth, growth, development, and preservation of our nation. It is a durable symbol of freedom and hope that commemorates the values of the country and the ideals of democracy through the visages of George Washington, Thomas Jefferson, Abraham Lincoln, and Theodore Roosevelt.
2. **The Natural Setting.** The Black Hills of South Dakota provide a dramatic natural setting for the sculpture. The pine forest, landscaping, natural soundscape, and night sky that comprise this setting are important not only for their aesthetic appeal but also represent a place of great spiritual and cultural significance to the American Indian Tribes who have connections to the land. The natural setting inspired sculptor Gutzon Borglum to select Mount Rushmore as the location for his monumental memorial to our national history and progress.

The park’s unique geological features, views of the sculpture, the Sculptor’s Studio, and museum collections are also considered fundamental resources and values of the Memorial but are not discussed in detail below or addressed in the 2020 or 2026 EAs because no impacts are expected to occur, and thus no potential for impairment.

Non-impairment determinations are not necessary for visitor use and experience because impairment findings relate to park resources and values (Guidance for Non-Impairment Determinations and the NPS NEPA Process, April, 2025). Visitor use and experience are not generally considered park resources or values according to the Organic Act. Visitor use and experience was also dismissed in the 2020 and 2026 EAs.

This determination has been prepared for the selected alternative, as described in the finding of no significant impact (FONSI). As a basis for evaluating the potential for impairment or unacceptable impacts on the park’s resources, the NPS relied on the 2020 and 2026 EA for the Independence Day Fireworks Event. Additionally, the non-impairment analysis for biological resources was informed by the Section 7 documentation for the Endangered Species Act.

The following resources or values were evaluated for the potential for impairment: vegetation, terrestrial wildlife, fish and aquatic invertebrates, water and soil quality, and cultural resources.

VEGETATION

The 1,278-acre Memorial is surrounded by the Black Hills National Forest and is northeast of the

U.S. Forest Service (USFS) Black Elk Wilderness and Norbeck Wildlife Preserve (see Figure 1 in the 2026 EA). The Memorial and adjacent lands are in the Black Hills Plateau ecoregion, which consists of a mixture of warm, dry pine forest and mixed grasslands. Ponderosa pine, which dominates the forested area in and adjacent to the Memorial, is a fire-adapted species, meaning it depends on frequent low-intensity fires to control seedlings, reduce forest floor debris, and recycle forest nutrients. It also is highly flammable and burns with great intensity and severity in the summer season in a typical dry year (2000, 2002, 2007, and 2012 were considered to be dry years). The natural setting, including the ponderosa pine community, is a fundamental resource of the park. General vegetation conditions at the Memorial are described in the 2020 EA on pages 13 and 14.

Impacts from a fireworks event on vegetation would be negligible, unless there is an escaped wildfire as a consequence of the event. For this reason, vegetation was dismissed as a stand-alone impact topic in the 2020 and 2026 EAs but was discussed in the wildfire analysis section. Impacts of an escaped fire on July 3rd on both the Memorial and adjacent landscapes, including the Black Elk Wilderness and Norbeck Wildlife Preserve, were evaluated for the selected alternative (2020 EA pages 20, 21, 23, and 24, 2026 EA Section 3.2) using a Wildland Fire Decision Support System model (WFDSS, 2020 EA page 18, 2026 EA Section 3.2). The results of the model reveal a low probability of a high-consequence wildfire event and high probability of a low-consequence wildfire event. A fire occurring within the model parameters will have environmental consequences for the Memorial, but flora in general will recover over several years. Even following a severe fire, the overall impacts will not be expected to cause a major change in vegetation communities, as evidenced following other fires in the Black Hills. The broken nature of the terrain and the resulting discrete islands of trees among the granite formations throughout the Memorial will ensure some continuity for seed sources following a fire. Following the analysis in the 2020 and 2026 EAs using the WFDSS models, the most likely wildfire scenario will be confined entirely to the Memorial and impacts on the Black Elk Wilderness and Norbeck Wildlife Preserve from wildfire are unlikely.

In summary, the selected alternative will not result in an impairment of this resource because even in the worst case scenario of a major high-consequence fire, impacts will not impede the natural function of these communities or result in a permanent loss of this natural setting at the Memorial; vegetation communities will recover and evidence of fire will become less noticeable over time.

WILDLIFE

General information on wildlife species and their habitats in the Memorial is provided in the 2020 EA on pages 14 and 15. Threatened, endangered, and sensitive species were dismissed from detailed analysis in the 2020 EA (see Section A.7 in EA Appendix A). However, threatened and endangered species were reconsidered, with additional analysis provided in the 2026 EA, Section 3.5.

Impacts on wildlife as a result of wildfire were evaluated for the selected alternative in the 2020 EA (see pages 21 through 23). Fires affect wildlife mainly through impacts on their habitat. Fires often cause short-term increases in food (e.g., recovering grasses and forbs and downed wood) that contribute to increases in populations of some animals (e.g., ungulates and woodpeckers).

Within forests, stand-replacement fires usually alter the wildlife community more dramatically than understory fires. A stand-replacement fire resulting from the actions in the selected alternative is unlikely.

Fires generally kill or injure a small proportion of wildlife populations. Mortality rates of mammals (small and large) are low, and direct fire-caused mortality has little influence on populations of these species as a whole. Most small mammals would avoid fire by using underground tunnel systems, whereas large mammals would find a safe location in unburned patches or outside the burn. Fire-caused bird mortality depends on the season, uniformity, and severity of burning. Mortality of adult songbirds is rare, but mortality of nestlings and fledglings could occur. Fire-caused injury to herpetofauna would be low, even though many of these animals, particularly amphibians, have limited mobility. The vulnerability of snakes to fire may increase while they are in ecdysis (the process of shedding skin). Fires affect fish mainly through impacts on their habitat. Wildfire affects fish and aquatic invertebrates by altering water chemistry (decreases in dissolved oxygen and pH and elevated turbidity) and flow (increased runoff and increased sedimentation) (see 2020 EA page 29 for a discussion of these effects). The vulnerability of insects and other invertebrates to fire depends on their location at the time of the fire. While adults can burrow or fly to escape injury, species with immobile life stages that occur in surface litter or aboveground plants are more vulnerable.

In general, fire impacts on wildlife under any of the wildfire model scenarios (described in the 2020 EA on page 18) would involve limited changes in wildlife habitat in the analysis area with minimal direct mortality and no population level effects. A low-consequence wildfire (which is the most likely scenario) would have localized impacts on wildlife habitat and would not likely result in a reduction of the species' population at the Memorial despite occasional instances of individual wildlife mortality. A high consequence fire would have greater habitat effects, but these effects are identical to naturally occurring wildfire effects in the Black Hills ecosystem. After a larger wildfire event, most wildlife species will occupy ample adjacent habitat and repopulate the fire area as plant regrowth occurs. For some species, the patches created by wildfire events improve habitat conditions. In conclusion, the selected alternative will not result in an impairment to wildlife populations and their habitats as a result of wildfire, because large stand-replacing fires and escaped fires are improbable and if they do occur, would likely impact individual organisms but not populations as a whole.

Impacts on wildlife, including mammals, birds, amphibians, fish, and invertebrates, as a result of environmental contaminants associated with fireworks were also evaluated for the selected alternative in the 2020 EA (see pages 32 through 35). A firework is the combination of a fuel (typically a metal or metalloid) and an oxidizer (typically perchlorate or nitrate salts) to enhance combustion along with binders, stabilizers, and anticaking agents. Environmental contaminants associated with fireworks include perchlorate, thiocyanate, and nitrate in addition to numerous other compounds that are released to the environment, partially due to the incomplete combustion of the fireworks and partially due to unexploded ordnance. Some contaminants, such as perchlorate and thiocyanate, can affect the metabolism, reproduction, and development of exposed individual organisms (wildlife and aquatic) and inhibit iodide uptake by the thyroid gland. Other contaminants, such as nitrates, can cause toxic algal blooms. Elevated metals exposure can cause reduced growth rate and development abnormalities in birds, and impact the nervous system, kidneys, and other vital systems in mammals. Contamination from prior

fireworks shows has likely caused elevated perchlorate concentrations in the Memorial's soil (Starling Gulch) and water (Grizzly Bear Creek), elevated nitrate levels in water (Lafferty Gulch), and elevated levels of copper and lead in soils sampled closest to the launch site in Lafferty Gulch. Limited sampling at the Memorial did not detect thiocyanate in the Memorial's finished drinking water (site L-7); however, surface water, groundwater, and soil at the Memorial have not been tested for thiocyanate or cyanide in the event thiocyanate is photochemically degraded.

It is assumed that the release of perchlorates, nitrates, thiocyanate, and metals to environmental media within the Memorial as a result of the selected alternative would be comparable to previous fireworks shows, and contamination levels observed in environmental media would gradually increase each year that fireworks events occur (impacts are described in the 2020 EA on pages 30 through 35). As discussed in the 2020 and 2026 EAs, adverse impacts on individual birds, mammals, amphibians, and invertebrates could result from increased environmental contaminants following future fireworks displays. However, any impacts on individual organisms would be expected to occur after the fireworks display and attenuate over time as contaminant levels dropped in surface water. No population level impacts are expected. Because previously measured levels were the result of 10 years of fireworks events, contaminant levels would not be expected to exceed levels measured previously for several years. A pre- and post-monitoring program of soil and water would also be in place to ensure that any increase in contamination (perchlorate, nitrate, thiocyanate, and metals) would be detected as early as possible (see 2020 EA Section 2.1.3 on page 8).

Effects to the monarch butterfly and western regal fritillary, two proposed species, are expected to be localized, temporary, and not likely to result in population-level consequences. Effects to the northern long-eared bat (endangered species) and the tricolored bat (TCB) (proposed endangered species) were assessed based on species ecology, timing of the event, and the nature of the activities (e.g., fireworks, aircraft flyovers, amplified sound, and lighting). The proposed action at the Memorial is expected to expose NLEBs to several stressors, with fireworks noise posing the greatest risk, particularly to pups. While adults may experience temporary disturbance, such as flushing from roosts, these effects are generally not long-term. Volant pups face higher risks, including stress, separation from mothers, injury, and predation; these impacts would not be discountable if maternity roosts are active during the event. However, population level effects or jeopardy to the continued existence of the species would not result. Artificial light may delay emergence and reduce juvenile growth, though impacts are expected to be similar to existing conditions. Fireworks could introduce contaminants like perchlorate and metals into water systems, but short-term exposure and dilution make severe effects unlikely. Wildfire risk from the event is minimal, though a fire could severely impact habitat and prey availability. Overall, the USFWS determined the action is likely to adversely affect NLEBs and issued an incidental take permit contingent on mitigation measures, including monitoring bat activity, noise, and contaminants. TCBs are expected to experience similar effects, primarily temporary and localized, without population-level consequences. However, if the TCB becomes listed before the event, the action would also be considered likely to adversely affect individuals, and USFWS has concurred with this determination and applied mitigation requirements similar to those for the NLEB. Overall, while the NLEB and TCB would be affected by the selected action, the impacts are primarily short-term, would not create population-level effects or cause jeopardy, and do not impair them or cause unacceptable impacts.

In summary, the selected alternative will not result in an impairment to wildlife populations, including mammals, birds, amphibians, fish, and invertebrates, and their habitats as a result of environmental contaminants because the release of contaminants will be comparable to previous fireworks shows, any impacts will occur to individual organisms, impacts would occur within hours after the fireworks display and attenuate over time, no population level impacts are expected, and monitoring will ensure that any increase in contamination will be detected as early as possible.

WATER AND SOIL QUALITY

The Memorial in the east-central Black Hills features Precambrian granite, pegmatite sills, dikes, and schist. Major soils are Marshbrook and Cordeston, with Marshbrook prone to compaction and erosion. Decomposing granite dominates the area, leading to hydrophobic soil conditions post-wildfire, increasing surface runoff. Three streams—Lafferty Gulch, Starling Gulch, and an Unnamed Tributary to Grizzly Bear Creek—are present. Groundwater exists in local aquifers within the bedrock, influenced by fractures and weathering. In West Fork Lafferty Gulch, groundwater is contained by an igneous sill acting as a dam.

Impacts on water quality and soils as a result of wildfire were evaluated for the selected alternative in the 2020 EA (see page 23) and the 2026 EA Section 3.3..2. In general, these effects are identical to those associated with naturally occurring wildfire of similar scales. Wildfire can impact water quality through increased erosion from burned areas, which increases sediment delivery to streams and other water bodies. Small, escaped wildfires would therefore not likely affect water quality in the drainage basins at the Memorial, or the larger watershed. A larger escaped fire with larger burned areas could increase sediment delivery to local water bodies and could affect the water quality of local water supplies and systems, including streams, local reservoirs, and treatment plants, due to elevated levels of metals and other contaminants, sediment and nutrient loading, debris, and increased turbidity. Short-term localized hydrophobicity in soil would also be expected from a severe wildfire. Long-term soil impacts, however, would be insignificant due to the dominance of the granitic soils and rock formations throughout much of the Memorial. In conclusion, the selected alternative will not result in an impairment of water quality or soils as a result of wildfire because large escaped fires and the resulting environmental effects are improbable, and because these types of effects are similar to naturally occurring wildfire effects in the Black Hills ecosystem.

Impacts on water and soil quality as a result of environmental contaminants associated with fireworks were also evaluated for the selected alternative in the 2020 EA (see pages 30 and 31) and the 2026 EA Section 3.3. As described above for terrestrial wildlife, fireworks contain contaminants that are released to the environment when they are detonated or when unexploded ordnance that is not recovered degrades over time. Past fireworks displays are the most probable source of perchlorate contamination in soil, surface water, and groundwater at the Memorial. Additionally, the groundwater system at the Memorial is highly susceptible to contamination due to the hydrogeologic conditions present.

The total amount of environmental contaminants that would be released as a result of the preferred alternative is not quantifiable given its dependency on many different factors, including the number of fireworks launched, the efficiency of combustion, and the composition and quality

of the fireworks used. It is assumed that the release of chemicals to water and soil within the Memorial would be comparable to previous fireworks shows, and contamination levels observed in water and soil would gradually increase each year that fireworks events occur. However, the amount of chemicals released per event is not expected to exceed the amount released in previous events. Because previously measured levels were the result of 10 years of fireworks events, contamination levels would not be expected to exceed levels measured previously for several years. A pre- and post-monitoring program of soil and water would also be in place to ensure that any increase in contamination (perchlorate, nitrate, thiocyanate, and metals) would be detected as early as possible (see 2020 EA Section 2.1.3, page 8).

The selected alternative will not result in an impairment to water and soil quality as a result of environmental contaminants because the release of contaminants will be comparable to previous fireworks shows, and monitoring will ensure that any increase in contamination will be detected as early as possible.

CULTURAL RESOURCES

A Cultural Landscape Inventory was conducted by the NPS in 2014, which identified Spatial Organization, Natural Systems and Features, Cultural Traditions, Circulation, Vegetation, Topography, Buildings & Structures, Small Scale Features, and Views & Vistas as contributing characteristics of the landscape, which preserves natural resources and the natural setting of the Black Hills. The cultural landscape is significant for its association with Northern Great Plains Tribes, and the importance of the Black Hills to these Tribes cannot be overstated. The ownership of the Black Hills remains disputed by a number of Tribes. The Six Grandfathers, a mountain of great significance to the Lakota, was called several different names by white settlers and explorers; the United States Board of Geographic Names officially recognized the name “Mount Rushmore” in 1930. In the early 1900s, the faces of four presidents were carved into the mountain, and this act is regarded by many Tribes as a desecration.

The Memorial’s historic district is also identified as a significant feature of the cultural landscape and was listed in the National Register of Historic Places on October 15, 1966. The historic district was updated in 2013 to encompass the entire Memorial.

During consultation with Tribal Historic Preservation Officers, the adequacy and completeness of the existing archeological survey data were questioned (see 2020 and 2026 EAs, Chapter 4). To address this, a Traditional Cultural Survey was completed in May 2021, which documented approximately 90 previously undocumented cultural sites within the boundary of the Memorial. General conditions of the Memorial’s historic district and cultural landscape are described in the 2020 EA on pages 36 and 37. General conditions of the Memorial’s historic district and cultural landscape are described in the 2020 EA on pages 36 and 37.

Impacts to the historic district and cultural landscape, as well as to traditional values of associated Tribes, were evaluated for the selected alternative in the 2020 EA (see page 37-39) and the 2026 EA Section 3.4. The few archeological resources within the Memorial would not likely be impacted by fireworks or wildfire direction because of their nature and location but could be affected by wildfire response.

All consulted Tribes objected to the event and consider it to be an adverse effect to the traditional cultural property and traditional cultural landscape of the Black Hills, but have not identified how the event would diminish the characteristics of the property that qualify it for inclusion in the National Register of Historic Places. Potential auditory and visual impacts that may occur to tribal members conducting ceremonies after dark near the Memorial would be short-term and would be similar in duration and impact to other fireworks displays conducted in the local area during the same time frame.

The Memorial's Foundation Document identified fireworks as a major threat to the sculpture, based on the nature of the fireworks program from 1998 to 2009 and its impacts on the cultural resources of the Memorial. Previous events were not adequately protective of the sculpture; mitigation measures included in 2020 and for any future events will include limitations on launch sites and requirements for protective materials to prevent scorching. If fireworks are launched from the Hall of Records area, short-term impacts would occur there from construction of a platform or other protective surface from which the fireworks mortars would be launched. Deposition of unexploded ordnance and mortar debris could cause adverse impacts on the historic district and cultural landscape. A fireworks malfunction within the Hall of Records area could cause adverse impacts on the walls and the entrance to the Hall of Records; however, elevating a platform above the Hall of Records or utilizing alternate launch sites would reduce the potential for these impacts. Other potential adverse impacts on the historic district and cultural landscape could occur from unexploded ordnance fallout, the ignition of wildfires, and the subsequent response to contain and extinguish the wildfire, but for the reasons described in this document will be minimized by various measures to be implemented as part of the project.

NPS also considered, but dismissed, the potential for percussive impacts to occur to the sculpture, based on the Poluga report which found the rock comprising the sculpture to be stable and the percussion from fireworks discharge to be insufficient to harm the sculpture.

The selected alternative will not result in an impairment to the historic district and cultural landscape because the NPS will take specific actions to ensure these fundamental resources are perpetuated for future generations and do not lose their integrity. Specifically, known archeological resources within the Memorial will not be directly affected by fireworks, indirect impacts on documented sites from wildlife responses will be avoidable using specific response measures, the additional tribal cultural sites survey was conducted to identify other potential sites, site protection measures will be developed through consultation with Tribes, any potential auditory and visual effects to tribal ceremonies will be short-term and similar in duration and impact to other fireworks displays, and historical resources will be protected from adverse impacts through avoidance measures, such as site selection and use of protective materials at launch locations. These actions all mitigate any potential for impairment to cultural resources.

CONCLUSION

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public review and comment, it is the superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the selected alternative. The NPS has determined that implementation of the selected alternative will not constitute an

impairment of the resources or values of Mount Rushmore National Memorial. This conclusion is based on consideration of the Memorial's purpose and fundamental resources and values, a thorough analysis of the environmental impacts described in the 2020 and 2026 EAs (including measures to minimize and mitigate potential impacts), comments provided through agency and tribal consultations, and the professional judgment of the decision maker guided by the direction of NPS *Management Policies 2006* and the NPS's 2011 Guidance for Non-Impairment Determinations and the NPS NEPA Process.