



## **FINDING OF NO SIGNIFICANT IMPACT**

### ***RE-ROUTE BARBER PEAK LOOP TRAIL OUTSIDE OF HOLE-IN-THE-WALL CAMPGROUND***

#### **MOJAVE NATIONAL PRESERVE, CALIFORNIA**

**March 2011**

The National Park Service plans to divert a portion of the six-mile Barber Peak Loop trail to a new 0.7-mile segment outside of the Hole-in-the-Wall campground in Mojave National Preserve. The purpose of this project is to circumvent conflicts between user groups and to provide an enjoyable, moderate hiking experience to park visitors. The new segment will direct trail users to a geologic formation that provides the visitor an eye-level, tactile experience. It separates trail users from campground occupants and provides a degree of privacy to the latter group.

Mojave National Preserve constructed the original Barber Peak Loop Trail in 2007 by combining the Hole-in-the-Wall campground with a route cutting across the Colton Hills grazing allotment adjacent to the northern end of the campground, connecting with an old road and cattlebraids around rhyolite cliffs, then joining the Mid Hills-to-Hole-in-the-Wall trail south to the Rings Loop trail, and back to the road leading to the southern end of the campground. The project was categorically excluded from further review under the National Environmental Policy Act because of its path across existing disturbance. Unfortunately, conflicts between campground occupants and trail users were not exhaustively considered at that time.

The National Park Service completed an environmental assessment that provides an analysis of the environmental consequences of alternate trail alternatives considered. The environmental assessment was prepared in accordance with the National Environmental Policy Act of 1969, as amended, its implementing regulations by the Council on Environmental Quality (40 CFR Parts 1500-1508), and Director's Order #12 and accompanying Handbook, Conservation Planning, Environmental Impact Analysis, and Decision-making. This document also satisfies the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended.

#### **PURPOSE & NEED FOR FEDERAL ACTION**

The Barber Peak Loop Trail is used by both campground occupants and day visitors to the Hole-in-the-Wall area. The need for the trail re-route arose after the Park started to receive complaints about conflicts between user groups. Consultation with the National Park Service's Harpers Ferry Center and Joshua Tree National Park Trails Crew resulted in the proposed action as described in the environmental assessment (EA).

The purpose of the proposed project is to circumvent conflicts between trail users and campground occupants. The alternate segment is needed to resolve existing conflicts between trail users and campground occupants. A route is desired that can lead hikers through native habitat of the Hole-in-the-Wall area and by interesting rhyolite formations, and allow users to complete the six-mile loop at a uniform starting point. Returning to the day-use parking lot and picnic area needs to be a clear and simple exercise after hiking on other portions of the loop trail.

### **SELECTED ALTERNATIVE**

Within the EA, Mojave NP identified Alternative B: Re-route Barber Peak Loop Trail outside of Hole-in-the-Wall Campground, as the agency-preferred alternative. The selected alternative is Alternative B – there are no modifications nor revisions to the proposal incorporated herein due to public comment. The Barber Peak Loop Trail will be re-routed outside of the Hole-in-the-Wall Campground along the 0.7-mile alternate segment along a route that parallels the Hole-in-the-Wall campground to its west. The complete trail loop will remain approximately six miles in total length.

Staff from Mojave NP and Joshua Tree National Park will work with volunteers from the American Hiking Society to complete construction of this segment. All construction will be performed with handtools (e.g., shovels, pulaskis, macleods, rakes). The trail will be built according to NPS standards, i.e., approximately 18-24" wide, with soil removed up to 4" in depth in some sections. In other sections, trail delineation will occur over bare rock. Erosion barriers will be installed where the route crosses ephemeral drainages. Carsonite directional posts will be installed to mark the hiking path, including where the alternate route joins the existing trail and at other trail junctions. The Joshua Tree National Park trail crew will determine final variances in the route during construction to minimize or avoid impacts

### **OTHER ALTERNATIVES CONSIDERED**

The environmental assessment prepared for this project also analyzed one other alternative: Alternative A: No Action. Under this scenario, the Barber Peak Loop trail would remain unchanged. Day users would access the Barber Peak Loop trail at the day-use parking lot/picnic area, then follow it until arriving at the northern end of the Hole-in-the-Wall campground. It would not be easily understood how to return to the day-use parking area. Trail users would be forced to walk the length of the campground, then return to the day-use parking area by following the road from the visitor center. Potential conflicts between trail users and campground occupants will persist. The trail will continue to have two trailheads and will not complete a full loop because of the campground and road. If the No Action alternative had been selected, these conflicts would remain unresolved.

### **ALTERNATIVES CONSIDERED BUT DISMISSED**

Other preliminary options considered included building an alternate route along the campground's western boundary; or paving the dirt campground road and constructing paved shoulders, a pedestrian walkway to the trailhead, and a parking lot at the trailhead. The first option was dismissed because of its proximity to the campground and lack of visual separation. It would not separate trail users and campground occupants enough to separate the uses and avoid conflicts. The latter option would involve extensive planning and design, provide quite a different hiking

experience, and require considerable funding. It would conflict with the deliberately informal character of the less developed Hole-in-the-Wall campground, and with Mojave's mandate to maintain the exploratory and discovery aspects of the Mojave experience. It would not resolve conflicts between trail users and campground occupants and was, therefore, dismissed, as well.

## **RATIONALE FOR SELECTED ALTERNATIVE**

Alternative B is the selected alternative because it resolves issues between campground occupants and trail users. It offers the highest degree of resource protection for wildlife and special-status species, while enhancing the visitor experience for both trail users and campground occupants.

The selected alternative accomplishes the purposes set forth in the EA. By constructing the alternate trail to bypass the campground, one trailhead is located (picnic area/day use parking lot) in a manner eliminating confusion among trail users about parking, trail direction, and returning to parking. Hiking and camping uses are separated, giving campground users a greater sense of privacy, and offers hikers a more scenic route of outstanding vistas, diverse flora, and interesting geologic features at eye level offering a tactile experience. Potential conflicts between hikers and vehicles along the road leading to the picnic area/parking lot are eliminated. While trail construction includes adverse but short-term impacts to native habitat, it will also minimize future impacts by containing hikers to the trail corridor.

## **ENVIRONMENTALY PREFERRED ALTERNATIVE**

In accordance with the criteria outlined in the National Environmental Policy Act and Director's Order #12, an environmentally preferred alternative must be identified, which must meet the following criteria:

### Criterion 1: Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.

Both Alternative A – No Action – and Alternative B – the Selected Alternative – provide equal protection of the environment for future generations. While Alternative B involves 0.7 miles of new disturbance to construct a bypass segment for the Barber Peak Loop trail, the impacts from this action are counterbalanced by the benefits of containing trail users to a designated path to protect the surrounding environs.

### Criterion 2: Ensure for all Americans, safe, healthful, productive, and aesthetically and culturally pleasing surroundings.

Alternative B – Selected Alternative – improves the visitor experience offered by the Barber Peak Loop trail by separating trail users from campground occupants, directing trail users through the natural habitat and distinctive geology of Hole-in-the-Wall. Alternative A – No Action – does not address potential conflicts between user groups and perpetuates an incomplete trail loop that does not return day users directly to their vehicles.

### Criterion 3: Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.

Both the No Action and Selected Alternatives meet criterion 3 – beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.

Criterion 4: Preserve important historic, cultural, and natural aspects of national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice. Historic, cultural, and natural aspects of national heritage are equally unaffected by both alternatives. Neither the No Action nor the Selected Alternative affect these resources. Both equally meet Criterion 4.

Criterion 5: Achieve a balance between population and resource use that would permit high standards of living and wide sharing of life's amenities.

Both Alternative A and Alternative B meet the requirements of Criterion 5. They each provide a balance between Mojave National Preserve's visitor population and recreational opportunities at the Hole-in-the-Wall area without significant adverse impacts to the area's resources.

Criterion 6: Enhance the quality of renewable resources and approach the maximum attainable recycling of resources.

Neither the No Action Alternative nor the Selected Alternative increases the use or quality of renewable resources or resource recycling. The Selected Alternative does include a provision for soils disturbed during trail construction to be used along the trail to construct erosion barriers and diversions within the same trail segment.

## MITIGATION MEASURES

Mojave NP places a strong emphasis on avoiding, minimizing and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the mitigation measures identified in Table 1 will be implemented as part of the selected alternative. The Preserve will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

**Table 1. Mitigation Measures to be Implemented.**

Resource	Mitigation Measures	NPS Responsible Party
General Measures	<ul style="list-style-type: none"> <li>Trail construction will conform to NPS trails standards.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)
Geology, Soils, & Vegetation	<ul style="list-style-type: none"> <li>Ground cover removal will be kept to a minimum.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)
	<ul style="list-style-type: none"> <li>Removed soils will be used further along the trail to level the ground surface.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)
Rare Plants	<ul style="list-style-type: none"> <li>The project area will be surveyed before trail construction begins. Rare plants will be mapped and flagged to be avoided.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)
Water Resources, Wetlands, and Floodplains	<ul style="list-style-type: none"> <li>Water bars and drainage dips will be installed where necessary to minimize erosion from water flow.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)
Wildlife and Wildlife Habitat	<ul style="list-style-type: none"> <li>The 0.7-mile bypass segment will confine Barber Peak Loop Trail users to a designated route. By doing so, human impacts to the surrounding wildlife and wildlife habitat will be minimized or avoided.</li> </ul>	Trail Crew Supervisor (Joshua Tree National Park)

Resource	Mitigation Measures	NPS Responsible Party
Threatened & Endangered Species	<ul style="list-style-type: none"> <li>All NPS employees and volunteers constructing the 0.7-mile bypass segment will receive an orientation to the desert tortoise and desert tortoise protective measures before construction begins. Impacts to desert tortoise will be avoided by implementing and enforcing Mojave National Preserve's desert tortoise protective measures as delineated in the Biological Opinion for Small Projects (1-8-98-F-17).</li> </ul>	Volunteer Coordinator
Visitor Experience	<ul style="list-style-type: none"> <li>Visitor experiences at Hole-in-the-Wall will improve both for campground occupants and Barber Peak Loop Trail users once the two user groups have been separated; trail users are directed through a rich desert wildlife habitat and provided a tactile experience with an eye-level geologic formation; and the Barber Peak Loop Trail begins and ends at the same point, returning day users to their vehicles by direct route.</li> </ul>	Mojave National Preserve staff and volunteers stationed at Hole-in-the-Wall Visitor Center.

**WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

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

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

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

Potential impacts may differ depending on the trail construction technique implemented. Actions taken under the selected alternative will result in the following effects.

**Public Health and Safety** – The Selected Alternative will have long-term beneficial impacts from all trail construction techniques.

**Visitor Experience** – The Selected Alternative will have a beneficial impact on visitor experience. Conflicts between user groups will be minimized or avoided. The 0.7-mile bypass segment will enhance the Barber Peak Loop trail experience by taking users through natural habitat and close to distinctive geology of the area. Trail users will be able to complete the six-mile loop at the trailhead and retrieve their vehicles at the same time.

**Special-status Species** (negligible impacts are equivalent to an Endangered Species Act §7 “may affect, but not likely to adversely affect” determination) – While the Hole-in-the-Wall area is suitable habitat for desert tortoise, there are no known observations of this federally Threatened species in the vicinity of the Hole-in-the-Wall visitor center or campground. The trail crew and volunteers will be oriented to desert tortoise protective measures as defined in the Biological Opinion for Small Projects (BO 1-8-98-F-17) but, in conclusion, the Selected Alternative will have no adverse impacts on this listed species.

**Wildlife** – The Selected Alternative will not affect wildlife use of the rhyolite cliffs or surrounding areas. Bighorn sheep are known to frequent the Hole-in-the-Wall area as a corridor between Wildhorse Mesa and Woods Mountain; they have not been adversely impacted by the multiple trails in the Hole-in-the-Wall area and would, likewise, be unaffected by the 0.7-mile bypass segment in the Selected Alternative.

**Wilderness** – The Selected Alternative takes place outside of designated Wilderness. The closest edge of wilderness boundary lies on the opposite side of Black Canyon Road from the Barber Peak Loop trail. The Selected Alternative will not have any adverse impacts on wilderness. Potential for short-term impacts from noise associated with trail construction is low and insignificant relative to existing soundscape impacts from road traffic, campground occupants and other visitors to Hole-in-the-Wall.

***Degree to which the selected action affects public health and safety.***

The selected alternative will have a long-term, beneficial effect on public health and safety by providing visitors with a designated trail route according to NPS trails standards and minimizing conflicts between user groups. The alternate bypass segment will separate trail users from campground occupants, will better contain trail users on a designated path and allow them a safe, tactile experience with the distinct geology of the area.

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

Ecologically critical areas, wild and scenic rivers, and prime and unique farmlands will not be affected. Effects to historic and cultural resources will be negligible to none, as these types of resources are not located within the vicinity of the Selected Alternative.

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

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

***Degree to which the selected 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. It corrects a problem with the existing Barber Peak Loop trail and is specific just to this particular route.

***Whether the selected actions are related to other actions with individually insignificant but cumulatively significant impacts.***

As described in the EA, cumulative impacts were determined by combining the possible effects of the preferred alternative with other past, present, and reasonably foreseeable future actions. It was, therefore, necessary to identify other past, ongoing, or reasonably foreseeable future projects at Mojave National Preserve and, if applicable, the surrounding region.

## **Projects Contributing to Cumulative Impacts**

Other plans and projects with potential to contribute to cumulative impacts of rerouting the Barber Peak Loop trail that were considered in the EA are noted below.

An EIS for a park-wide water resources management plan is in the early scoping phase.

Mojave NP staff currently is beginning to develop a non-motorized trails management plan to address long-range trails planning and development, standardized maintenance protocols, and innovative recreational opportunities for the visiting public. Staff is also working on a backcountry/roadside campsite inventory and monitoring program to manage campsites outside of the Preserve's established campgrounds at Hole-in-the-Wall and Mid Hills.

Mojave NP has contracted for a livestock management plan that will address the park's grazing activities. This plan is scheduled for completion in 2011.

The Preserve's Fire Management Plan is scheduled for revision in fiscal year 2011.

As reviewed in the environmental assessment, the Selected Alternative will not lead to cumulative impacts for any of the resources reviewed. The Barber Peak Loop trail will not, in itself, lead to increased visitation to Hole-in-the-Wall. The number of recreational opportunities will not increase. The Preserve has no other planning efforts specific to the Hole-in-the-Wall area. No cumulative impacts will result from implementation of the Selected Alternative.

Cumulative effects on special-status species will be negligible to non-existent. Cumulative impacts to wildlife will be negligible and short-term.

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

Mojave National Preserve's archeologist and National Historic Preservation Act (NHPA) specialist has determined the Selective Alternative will not adversely affect districts, sites, highways, structures or objects listed on the National Register of Historic Places. Section 106 consultation with the State Historic Preservation Officer (required under NHPA) will not be necessary.

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

The Selected Alternative will not adversely affect the desert tortoise. Nonetheless, the trail crew will be oriented to desert tortoise protective measures as defined in the Biological Opinion for Small Projects Affecting Desert Tortoise Habitat in Mojave National Preserve, San Bernardino County, California (1-8-98-F-17) (US Fish and Wildlife Service, 1998). Mojave National Preserve will report all trail construction work that takes place within desert tortoise critical habitat or impacts desert tortoise anywhere within the Preserve in its annual report to the US Fish and Wildlife Service, as required under the same biological opinion.

### ***Whether the selected actions threaten a violation of federal, state or local law imposed for the protection of the environment.***

The selected alternative violates no federal, state, or local environmental protection laws.

## **PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

Public scoping for this project began when visitors mentioned to park staff and volunteers difficulties encountered when using the Barber Peak Loop Trail. Visitors started to use the trail in 2007 shortly after it was constructed. Issues they mentioned include determining where visitors could park vehicles to start the trail, and how to return to their vehicles since the loop as originally built did not finish where it started. Most visitors to Hole-in-the-Wall hike all or part of the Barber Peak Loop trail; in fiscal year 2010, 8,921 visitors were recorded. In 2009, Mojave's Chief of Interpretation consulted with Harpers Ferry Center and contract wayside planners about finding a solution to these problems. These consultations resulted in the proposal of a full loop in which hikers start and finish the Barber Peak Loop from the same point. The idea to bypass the campground also resolved the issue of trail users being able to park, complete the loop, and return directly to their vehicles. In February 2010, Mojave staff invited the Joshua Tree National Park trail crew to visit the site and consult with them on a possible route to achieve these goals.

The EA was made available for public review during a comment period that ended March 8, 2011. An electronic copy of the document was placed on Mojave NP's Planning, Environment, and Public Comment website. News releases were sent to 143 media outlets and contacts for public libraries in Riverside (California), San Bernardino (California), and Clark (Nevada) counties. The library contacts distributed the notice to all branch libraries within each county. A notice was posted on Mojave National Preserve's website, as well, with a link to the public PEPC page. The public was invited to direct comments or concerns related to this project on the website and directly to the Superintendent by postal delivery.

During the public comment period, the National Park Service received no comments either via mail or the NPS's Park, Planning and Public Comment website ([www.parkplanning.nps.gov](http://www.parkplanning.nps.gov)). No textual changes to the environmental assessment were required, neither was the environmental impact analysis altered.

## **NO IMPAIRMENT OF PRESERVE RESOURCES OR VALUES**

The National Park Service has determined that the implementation of the selected alternative will not constitute impairment to the resources or values of Mojave National Preserve. This conclusion is based on a thorough analysis of the environmental impacts described in the EA (and summarized above, consideration for NPS trails standards, consultation with the Joshua Tree National Park trails crew and with Harpers Ferry Center, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies (2006). As described in the environmental assessment, implementation of the selected alternative will not result in major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mojave National Preserve; (2) key to the natural or cultural integrity of the Preserve; or (3) identified as a goal in the Preserve's General Management Plan or other relevant National Park Service planning documents.



**CONCLUSION**

The National Park Service has selected the above mentioned Alternative B: Re-route Barber Peak Loop Trail Outside of Hole-in-the-Wall Campground, for implementation. The impacts that will result from the selected alternative will not impair any Preserve resources or values necessary to fulfill specific purposes identified in the enabling legislation for Mojave National Preserve.

The selected alternative does not constitute an action that would normally require preparation of an environmental impact statement. The selected alternative will not have a significant impact on the human environment. Negative environmental impacts that could occur are no greater than minor in intensity. Unacceptable public hazards in Wilderness are mitigated. There are no significant impacts on public health, safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this action and thus will not be prepared.

**Recommended:** Lawrence J. Whalon 3/29/11  
Lawrence J. Whalon Date  
Acting Superintendent  
Mojave National Preserve

**Approved:** Christine S. Lehnert 4/1/11  
Christine S. Lehnert Date  
Regional Director, Pacific West Region

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It includes a detailed description of the experimental procedures and the statistical tools employed to interpret the results.

3. The final part of the document provides a comprehensive summary of the findings and conclusions drawn from the study. It highlights the key insights and discusses the implications for future research and practice.

4. The document also includes a section on the limitations of the study and the potential areas for further investigation. It acknowledges the constraints of the current research and suggests ways to address these limitations in subsequent work.

5. Finally, the document concludes with a list of references and a bibliography, providing a clear path for readers to explore the sources and materials used in the study. This section is essential for verifying the accuracy of the information and for further research.