



Memo To File

To: Files
From: Superintendent,
Through: Park Interdisciplinary Team
Subject: Adequacy of National Environmental Policy Act Documentation

A. Project Information

Park Name: Mojave National Preserve
Project Number: 15-moja-012/PEPC 56658
Project Title: Remove wildlife barrier portion of unused historic cattle fence
Project Type: Resource Management (RM)
Project Location:
County, State: San Bernardino, California
Other: West of the Mid Hills, north and south of Cedar Canyon Road

Project Leader: Anne Kearns
Project Title: Remove wildlife barrier portion of unused historic cattle fence
Contract #/Contractor Name: n/a
Administrative Record Location: Headquarters-Barstow
Administrative Record Contact: Anne Kearns

B. Project Description

One of the Kessler Springs Ranch barbed wire fences poses a threat to wildlife and is a barrier to recreational visitors. Although it has been determined to be a contributing historic feature, it has been identified as harmful to wildlife and a barrier to wildlife migration. The present proposal is to modify this historic fence so it becomes wildlife friendly. Incidental to becoming wildlife friendly, the project will also make the fence much more visitor friendly.

The alternative proposed is to remove all the fence wires from the posts and leave them on the ground in place. Other alternatives exist, however, and all should be evaluated by the Management Team, the park archaeologist, and the park wildlife biologist. Other alternatives include removing the wires from the posts and hauling them for recycling; removing all wires from just certain portions of the fence; removing just the barbed wires from the fence while leaving the smooth wires on the posts.

This fence runs in a more or less north-south direction and crosses Cedar Canyon Road approximately two miles east of Kelso-Cima Road. Portions of the fence lie south of Cedar Canyon Road and two and one half miles lie north of Cedar Canyon Road. The fence was rated in "fair condition" in the 2001 Dewey Livingston report.

John Hiatt, a seasoned volunteer for Mojave Preserve, will be performing the work for this project. He is very experienced with cattle fencing, both constructing and removing. Mr. Hiatt has an excellent safety record. He plans to do a field check to identify the exact locations and current condition of the fence during the first week of February.

Memo To File Prepared Date: 03/10/2015
Anticipated compliance completion date: 02/24/2015
Projected advertisement/Day labor start: n/a
Construction start: 03/16/2015 Requested

C. Description of Previous Compliance Documentation

2. Is the project in an approved plan such as a General Management Plan or an Implementation Plan No with an accompanying NEPA document?

D. Step 4 NEPA: Memo To file

Added to File Date:	Explanation: Mojave National Preserve staff has completed an interdisciplinary review of the proposed action. Concerns were raised regarding ownership of the fence; the potential for cultural or historic value; any consideration of the area for historic district nomination; potential resource damage from driving and removal activity; and necessity of the project. The Science & Resource Stewardship Division discussed the proposal at length (03/09/2015), concluding that the proposed action is not necessary. The fence line in question is a contributing element to a National Register nominated district; therefore, any alteration to the fence line would require compliance with the California State Historic Preservation Office and NPS-Washington Office Keeper of the National Register. The S&RS Division concluded the proposed action is unnecessary and should be denied.
----------------------------	--

E. Impact Analysis**C. RESOURCE EFFECTS TO CONSIDER:**

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Data Needed to Determine/Notes
1. Geologic resources – soils, bedrock, streambeds, etc.	No				
2. From geohazards	No				
3. Air quality	No				
4. Soundscapes	No				
5. Water quality or quantity	No				
6. Streamflow characteristics	No				
7. Marine or estuarine resources	No				
8. Floodplains or wetlands	No				
9. Land use, including occupancy, income, values, ownership, type of use	No				

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Data Needed to Determine/Notes
10. Rare or unusual vegetation – old growth timber, riparian, alpine	No				
11. Species of special concern (plant or animal; state or federal listed or proposed for listing) or their habitat	No				
12. Unique ecosystems, biosphere reserves, World Heritage Sites	No				
13. Unique or important wildlife or wildlife habitat	No				
14. Unique or important fish or fish habitat	No				
15. Introduce or promote non-native species (plant or animal)	No				
16. Recreation resources, including supply, demand, visitation, activities, etc.	No				Recreation opportunities will be somewhat enhanced by this project.
17. Visitor experience, aesthetic resources	No				Visitor experience and aesthetic resources will be somewhat enhanced by this project because many visitors object to seeing barbed wire fences in the preserve. This assertion is contradicted by the portion of visitors who appreciate the ranching history of the eastern Mojave Desert.
18. Archeological resources	No				

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Data Needed to Determine/Notes
19. Prehistoric/historic structure	No				The fence line is a contributing element to the Rock Springs Land & Cattle Company District which has been nominated for the National Register of Historic Places. Removal of the fence or any portion, thereof, would require compliance with the California SHPO and NPS-WASO Keeper of the National Register.
20. Cultural landscapes	No				
21. Ethnographic resources	No				
22. Museum collections (objects, specimens, and archival and manuscript collections)	No				
23. Socioeconomics, including employment, occupation, income changes, tax base, infrastructure	No				
24. Minority and low income populations, ethnography, size, migration patterns, etc.	No				
25. Energy resources	No				
26. Other agency or tribal land use plans or policies	No				
27. Resource, including energy, conservation potential, sustainability	No				
28. Urban quality, gateway communities, etc.	No				

Identify potential effects to the following physical, natural, or cultural resources	No Effect	Negligible Effects	Minor Effects	Exceeds Minor Effects	Data Needed to Determine/Notes
29. Long-term management of resources or land/resource productivity	No				
30. Other important environment resources (e.g. geothermal, paleontological resources)?	No				

F. Conclusion

The interdisciplinary team (IDT), consisting of the IDT members listed below, conducted internal scoping to review the proposed project. After careful review the team concurs that the previous document adequately describes and analyzes the impacts for Project ID#: 56658. There is no change to project scope, the description of impacts (context, intensity and duration) remain as described in the previous NEPA document, and site conditions have not changed since preparation of the environmental assessment. No additional public involvement is required. Neither the original compliance document (i.e., EA or EIS) nor this evaluation have identified adverse resource impacts that would lead to an impairment of National Park System resources and values from implementation of this project. This assessment is consistent with the original decision document (i.e., FONSI or ROD).

Interdisciplinary Team Leader Name Anne Kearns	Field of Expertise Project Leader/Realty Specialist
Technical Specialists Names Neal Darby Debra Hughson Christina Mills David Moore David Nichols John Piastuck Todd Suess Larry Whalon Lisa Wilson Danette Woo	Field of Expertise Wildlife Biologist Chief of Science & Resource Stewardship Chief, Interpretation <i>ACTING</i> Chief of Maintenance NHPA Specialist Chief Ranger Superintendent Deputy Superintendent Administrative Officer NEPA Specialist

G. Signatory

Based on the environmental impact information contained in the statutory compliance file and in this environmental screening form, environmental documentation for this stage of the subject project is complete.

Consultation with REC Date: n/a

Recommended:

Compliance Specialist:

NEPA

Danette Woo  Date: 03/10/2015

NHPA

David Nichols /s/ DAVID R. NICHOLS Date: 03/09/2015

Superintendent:  Date: 3-17-15

NPS Contact:  Date: 03/10/2015

PEPC Report - Internal Comments /Response (03/10/2015)**Project Title:**Remove wildlife barrier portion of unused historic cattle fence**ProjectID:**56658**Document Title:** Environmental Review**Total Comment Files Uploaded:** 0**Report Criteria**

ProjectID:	56658
Comment Set:	All
Chapter/Appendix:	All
Page:	All
Paragraph:	All
Line:	All
Date Submitted From:	
Date Submitted To:	
Commenter:	All
Subject:	All
Editorial:	All
Text: (matches text in Comments Text or Response Text field)	All

Report Results (found total '11' comments and associated responses)

Comment Set: 30215 **Comment ID:** 71010
Subject: Barbed wire fence **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: Larry Whalon**Comment:** Does anyone claim to own the fence or have concerns about the fence coming down"

Is the fence a cultural resources and due we need to follow up with more cultural resource analysis based on this area know being under consideration for historical district status" When Dewey completed the survey it was not nominated.

Response: None

Comment Set: 30215 **Comment ID:** 71011

Subject: - Editorial: No

Chapter/Appendix: Page: Paragraph: Line:

Commenter: Larry Whalon

Comment: Is the fence made out of WWII era barbed wire" and is that considered historically important"

Response: None

Comment Set: 30215 Comment ID: 71012

Subject: - Editorial: No

Chapter/Appendix: Page: Paragraph: Line:

Commenter: Larry Whalon

Comment: Will there be any resource damage from driving or other sources, caused by the fence removal action"

Response: None

Comment Set: 30279 Comment ID: 71434

Subject: no comments. Editorial: No

Chapter/Appendix: Page: Paragraph: Line:

Commenter: Lisa Wilson

Comment: no comments - okay as written.

Response: None

Comment Set: 30398 Comment ID: 72731

Subject: Cultural Eval of existing fenceline Editorial: No

Chapter/Appendix: Page: Paragraph: Line:

Commenter: David R. Nichols

Comment: Survey Thomas Pasture fence line starting on the East side @ 640516E/ 3892314N. Heading N.

First opening @ 640516E/ 3892377N at the intersection of the Mojave Road. The fence line on the East side is constructed of historic rail road ties and gridded metal predator fencing. No other openings on the East side until you reach the corrals @ 639917E/ 3893538N. Photo 4692. The corrals take up most of the North end of the pasture.

Opening on the West side @ 639868E/ 3893498N. The West side fence line in this section is constructed of historic rail road ties, Juniper pine posts, and barbed wire. The barbed wire is double stranded single barb construction. No other openings were observed on the West fence. At the halfway point along the fence the construction changes to rail road ties and predator fencing.

Opening at the SW corner on the South side @ 639872E/ 3892303N The fence line on the South side is constructed of historic rail road ties and gridded metal predator fencing.

There seems to be plenty of access through the pasture fenced area without the need to create more. Both, people and animals seem to be negotiating through passage without any difficulty. This project does not seem necessary.

Response: None

Comment Set: 30279 **Comment ID:** 71432
Subject: okay as written **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: Lisa Wilson

Comment: I don't have any comments. I am okay with this as written.

Response: None

Comment Set: 30243 **Comment ID:** 71228
Subject: - **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: John Piastuck

Comment: I support this project.

Response: None

Comment Set: 30485 **Comment ID:** 72794
Subject: Impacts to wildlife **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: Neal Darby

Comment: Per email (03/09/2015): To put me on the record, I had walked the fence and found several openings, not necessarily gates, so movement in and out is not an issue. My initial concern was if animals are startled, say from passing motorcyclists, they could panic and run into the fence because of its height. But after walking it, that shouldn't really be an issue due to position of road along fence and the ample space/perimeter for movement away from the road. Therefore, I can see no

need for removal in wildlife terms other than it would make a good project, and keep Dave N. busy.

Response: None

Comment Set: 30254 **Comment ID:** 71254
Subject: alternatives **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: Debra Hughson

Comment: In order to select an action alternative (something other than no action) we need to:

1. Establish that the fence does disrupt/fragment wildlife habitat or pose a wildlife threat.
2. Ensure that modifications can be made to improve wildlife habitat that do not detract or diminish the historical character of the contributing feature.

Response: None

Comment Set: 30398 **Comment ID:** 72516
Subject: Cultural Resources comment **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: David R. Nichols

Comment: I've seen deer hop right over these fences. I've seen people do the same thing, in varying ways. This seems to be an unnecessary proposal. If this is a project that is actually deemed necessary then I'll go ahead and go through the necessary steps. This particular fence line, as it stands, is already nominated as "contributing" to the National Register as historic. The issues with taking it down, changing it, "improving" it will be complex. The Nomination is already at the WASO level. I know Annie's volunteer is excited to go out and do this sort of work but this is one that, in my opinion, should remain as-is. Let me know general opinion on this with my input before I start the tiresome process of going through the CA SHPO and the WASO Keeper of the National Register. We would also be obligated to invite public opinion and have to defend our position with "interested parties" such as Dennis Casebier and his crowd

Response: None

Comment Set: 30219 **Comment ID:** 71017
Subject: - **Editorial:** No
Chapter/Appendix: **Page:** **Paragraph:** **Line:**

Commenter: Christina Mills

Comment: If this fencing is part of a historic landscape proposal, then is this project important enough to possibly interfere with that? Volunteers removed two miles of non-historic fencing south of Globe Mine Road a few years ago, so there are areas where wildlife can easily cross without a fence.

If the decision is made to remove the wires from the posts, then it seems more logical to remove the

wire altogether rather than let it lie on the ground. Animals and humans would still trip on it, get tangled in it, and get hurt stepping on it that way.

Response: None