

United States Department of the Interior
Bureau of Land Management

Categorical Exclusion Documentation
DOI-BLM-NV-B020-2025-0012-CX

Clifford Spring Restoration Project

July 2025

PREPARING OFFICE
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Bureau of Land Management
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**Categorical Exclusion Documentation Format When Using Categorical Exclusions Not
Established by Statute**

A. Background

BLM Office: Tonopah Field Office 1553 S. Main St. Tonopah, Nevada 89049	Serial Number: RIN 1001216
	NEPA Number: DOI-BLM-NV-B020-2025-0012-CX
Title: Clifford Spring Restoration Project	
Type of Project: Range Improvement Project.	
Location of Proposed Action: South of Hwy 6, in Stone Cabin Valley, near Tonopah, Nevada.	
Legal Land Description: Mount Diablo Meridian, Nevada T. 3 N., R. 49. E., sec. 11, SE1/4SW1/4.	
Disturbance Acreage: 0.9 acres	
Name of Preparer: Ryan Robles	

Description of Proposed Action: The Nevada Department of Wildlife (NDOW) has submitted a proposal for the issuance of a cooperative range improvement agreement to authorize the construction of an exclusionary fence and water control structures around a degraded water source. This spring has been heavily utilized by wild horses leading to the loss of riparian vegetation and increased soil erosion. The purpose of this project is to improve riparian habitat and provide rest to an overutilized water source. Some new disturbance is proposed for the construction of the exclusionary fences which would be capable of excluding cattle and horses while being permeable to wildlife. Ground disturbance would adhere to current BLM standards and would be kept to the smallest extent possible to complete this project. Alternatives for the placement of these structures (Figure 2) have been developed to avoid cultural resources and allow for flexibility during construction. If approved, a cultural monitor would be present during construction and assist in the determination of which alternative is best suited at avoiding sensitive areas during implementation.

The proposed project involves the construction of an estimated 730 linear feet of welded drill steel two-rail fence, two gates, up to 360 linear feet of in-ground pipelines, one tire tank equipped with a thermo riser, and one tire trough located outside of the enclosure. The fence would be constructed out of 2 3/8" drill steel pipe allowing it to be wildlife friendly and capable of withstanding pressure from horses, livestock, and inclement weather. Fence design includes posts at 10-foot spacing with two cross members welded between each post. To minimize ground disturbance, all posts are driven up to 48 inches into the ground using an impact attachment on a

small skid steer. If ground conditions do not allow for posts to be driven, post holes would be dug to a 36-inch depth and posts would be set in concrete up to 6 inches below the ground surface. Cross members would be installed between posts at 42-inches and 22-inches above grade. Gates would be 8-foot wide, constructed out of the same materials, mounted on hinges to allow egress, and locked via a daisy chain of padlocks to allow access to all parties involved.

The tire tank would be constructed out of a heavy equipment tire laid flat with a maximum tolerance of ½" lean across the width of the tank. Concrete would be poured between the tire bead and pipes to provide a bottom to the tank and prevent leakage. A 30" HDPE pipe or culvert would be inserted into the ground through the center of the tire to provide a geothermal sink preventing the tank from freezing and allow access to the supply lines for maintenance. This geothermal sink would be encircled by an insulative donut ring with a locking lid to help prevent cold air from entering the tank. The tank would be fed from the spring using a pipeline placed beneath the frost line (36" below grade) (Figure 2). Water would enter the pipeline via a standpipe or French drain system installed at the spring head. The standpipe height would be left long until restoration goals are met then adjusted to allow for only excess water to enter the tank system. This would help retain the water needed within the spring to contribute to its restoration while simultaneously moving excess water to the storage tank. The standpipe would be adjusted as needed throughout the life of the project to maintain multiple use objectives. A float valve within the tank would act as a secondary mechanism for managing flows into the tank to ensure it does not overflow.

A rubber tire stock water trough would be installed outside of the enclosure and fed by a pipe installed below the frost line (36") running from the tire tank to the base of the trough (Figure 2). The trough would be laid flat partially in the ground atop a 6" thick concrete plug where the pipe would run through to feed water into the system. Wildlife escape ramps would be placed on opposite ends of the trough.

An existing metal pipeline that was installed during historic mining activity in the area would also be repaired and replaced as necessary to facilitate better flows to the spring. Work on the pipe may extend uphill by as much as 40-50ft but will remain away from nearby rimrock to avoid disturbing sensitive cultural resources. This metal pipe historically brought water to the surface and created a small pool shown in Figures 8, 9, and 10. However it has been trampled and no longer functions as it normally would have.

Access to the site is possible through existing roads and no new roads would be constructed. No cross-country travel with motorized vehicles shall take place when the ground is muddy and could cause ruts to form. No blading or scraping of the ground along the fence line or to the site is permitted. Overland travel along the fence line would be permitted. Trenches dug for pipe installation would be observed by a BLM representative to protect cultural resources and modify installation as necessary. If destruction of archaeological sites is found to be occurring during the construction phase, work on the project shall be terminated until a data recovery plan is prepared and completed in accordance with the National Historic Preservation Act and the State Historic Preservation Office.

To encourage revegetation of the disturbed site and create a buffer to invasive weeds, seeding of native species would occur within and around the enclosure at standard rates. Seed mixes would

match historically dominant vegetation occurring in the reference state of the present ecological site descriptions.

Nevada is the driest state in the nation in terms of annual average precipitation. In the recent past, Nye and Esmeralda Counties have been in Extreme or Exceptional drought. Drought conditions further strain the limited number of available riparian habitat and water sources available for wildlife. Increased winter precipitation during the last two years has helped to reduce pressures but has not removed all threats to native species. Under the current climatic and hydrologic conditions, there is an increased need to provide reliable water sources to wildlife, particularly big game species such as bighorn sheep and mule deer.

The project has three main priorities in descending order of importance: (1) restoration of natural spring flows, native vegetation, and water quality, (2) provide a continuing water source for wildlife and wild horses to prevent displacement of local populations that could lead to increasing pressure on alternative water sources in the area, and (3) supply livestock with water if other management objectives are being met. Over time, the reestablishment of native vegetation at the water sources would decrease the amount of soil erosion and preserve the available water benefitting all users.

B. Land Use Plan Conformance

Land Use Plan Name: Tonopah Resource Management Plan (RMP)

Date Approved/Amended: October 2, 1997

 The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision(s):

 X The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decision(s) (objectives, terms, and conditions):

The Tonopah Resource Management Plan (RMP) and Record of Decision signed October 2, 1997, allows for maintenance and improvement of vegetation and wildlife habitat condition.

The RMP objectives state:

"Manage the vegetation resource for desired plant communities", under the Vegetation section (Pg. 5).

"To maintain and enhance wildlife habitat and provide for species diversity", Under the Wildlife Habitat section (Pg. 7).

"To achieve and maintain the presence of adequate vegetation, landform. or large woody debris to dissipate stream energy, associated with high water flows for all riparian-wetland areas", under the Riparian Habitat section (Pg. 10).

C. Compliance with NEPA

The Proposed Action is also categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.11 (J)(4) U.S. Fish and Wildlife Service, 516 DM 8 (B)(3) as adopted in 90 FR 3908.

The construction of new, or the addition of, small structures or improvements, including structures and improvements for the restoration of wetland, riparian, instream, or native habitats, which result in no or only minor changes in the use of the affected local area. The following are examples of activities that may be included.

- a) The installation of fences.
- b) The construction of small water control structures.
- c) The planting of seeds or seedlings and other minor revegetation actions.
- d) The construction of small berms or dikes.
- e) The development of limited access for routine maintenance and management purposes.

These categorical exclusions are appropriate in this situation because there are no extraordinary Circumstances with the potential to significantly affect the environment. The proposed action has been reviewed, and none of the extraordinary circumstances described in 43 Code of Federal Regulation (CFR) 46.215 apply.

I considered all pertinent ecological, social and environmental factors which may be impacted by the project. In addition, I have reviewed the plan conformance statement and have determined that the proposed action is in conformance with the approved land use plan. No additional environmental analysis is required. The location of the proposed action is not within a right-of-way avoidance area as specified in the RMP.

D. Signatures

Authorizing Official:


Perry B. Wickham
Field Manager, Tonopah Field Office

09 July 2025

Contact Person: For additional information concerning this CX review, contact Ryan Robles, Natural Resource Specialist, Tonopah Field Office, P.O. Box 911, Tonopah, NV 89049, (775) 482-7833.

Table 1. Screening for Extraordinary Circumstances

#	Screening for Extraordinary Circumstances: This project will not:	Yes	No
1	Have significant impacts on public health.		X
	Rationale: The cooperative range improvement agreement is for a protective enclosure around sensitive resources. It is not anticipated that the proposed action will have any effects to public health and safety.		
2	Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.		X
	Rationale: Issuing a cooperative range improvement agreement will not have significant impacts on such resources.		
3	Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102 (2) (E)].		X
	Rationale: There is no controversy concerning the proposed action.		
4	Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.		X
	Rationale: The activity proposed in this CX is a long-standing practice on BLM administered lands. The BLM ID Team of resource specialists reviewed this project and determined there are no highly uncertain, potentially significant, unique, or unknown risks.		
5	Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.		X
	Rationale: The activities proposed in this CX are addressed and authorized under the 1997 Tonopah ROD/RMP. The proposed activities occur widely on Federal lands throughout NV and there is no evidence this type of activity would establish a precedent or decision for future actions that would have significant environmental effects.		
6	Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.		X
	Rationale: The Proposed Action will not create cumulatively significant environmental effects based on the scope and location of the action.		
7	Have significant impacts on properties listed or eligible for listing, on the National Register of Historic Places as determined by either the bureau or office.		X
	Rationale: Issuing the cooperative range improvement agreement would not have significant impacts to any properties either listed or eligible for listing on the National Register of Historic Places (NRHP).		
8	Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species.		X
	Rationale: Where appropriate, PDFs/stipulations have been incorporated into the land use authorization to protect listed, or proposed to be listed species and their habitats. Appropriate buffers and seasonal restrictions will be implemented to avoid any adverse effects to threatened or endangered species or designated critical habitat.		
9	Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.		X
	Rationale: The proposed activities conform to the TFO RMP's direction for management of public lands in areas of jurisdiction and comply with applicable laws, rules, and regulations.		

#	Screening for Extraordinary Circumstances: This project will not:.	Yes	No
10	Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898). ¹		X
	Rationale: The President has revoked Executive Order 12898.		
11	Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites.		X
	Rationale: The BLM field office area archaeologist reviewed the project. No Native American sacred sites were identified. The activity does not significantly or adversely affect the physical integrity of any such sacred sites.		
12	Contribute to the introduction, continued existence, or spread of noxious weeds or non-native species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).		X
	Rationale: The proposed action does not result in measurable changes to the current baseline of the risk, or actual introduction, continued existence, or spread of noxious weeds or nonnative invasive species in or from the project area.		

All of the above questions must be answered negatively before the Categorical Exclusion may be approved. This checklist is taken from 516 DM 2, Appendix 2.

Table 2. List of Resource Specialists and Resources Reviewed, along with initials and date of review.

Reviewed By:	Role/Title:	Initials	Date:
Michael Strother	Wildlife Biologist	MES	7/8/2025
Ashton Jenks	Archaeologist	ARJ	7/8/2025
Eden Long	Wild Horse & Burro	EVL	4/14/2025
Ryan Robles	Rangeland Management	RAR	4/7/2025

Enclosures
Exhibit A – Maps
Exhibit B – Example Photos
Exhibit C – Site Photos
Exhibit D – Legal Land Description

¹ Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 *et seq.* Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The BLM verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum.

Clifford Spring

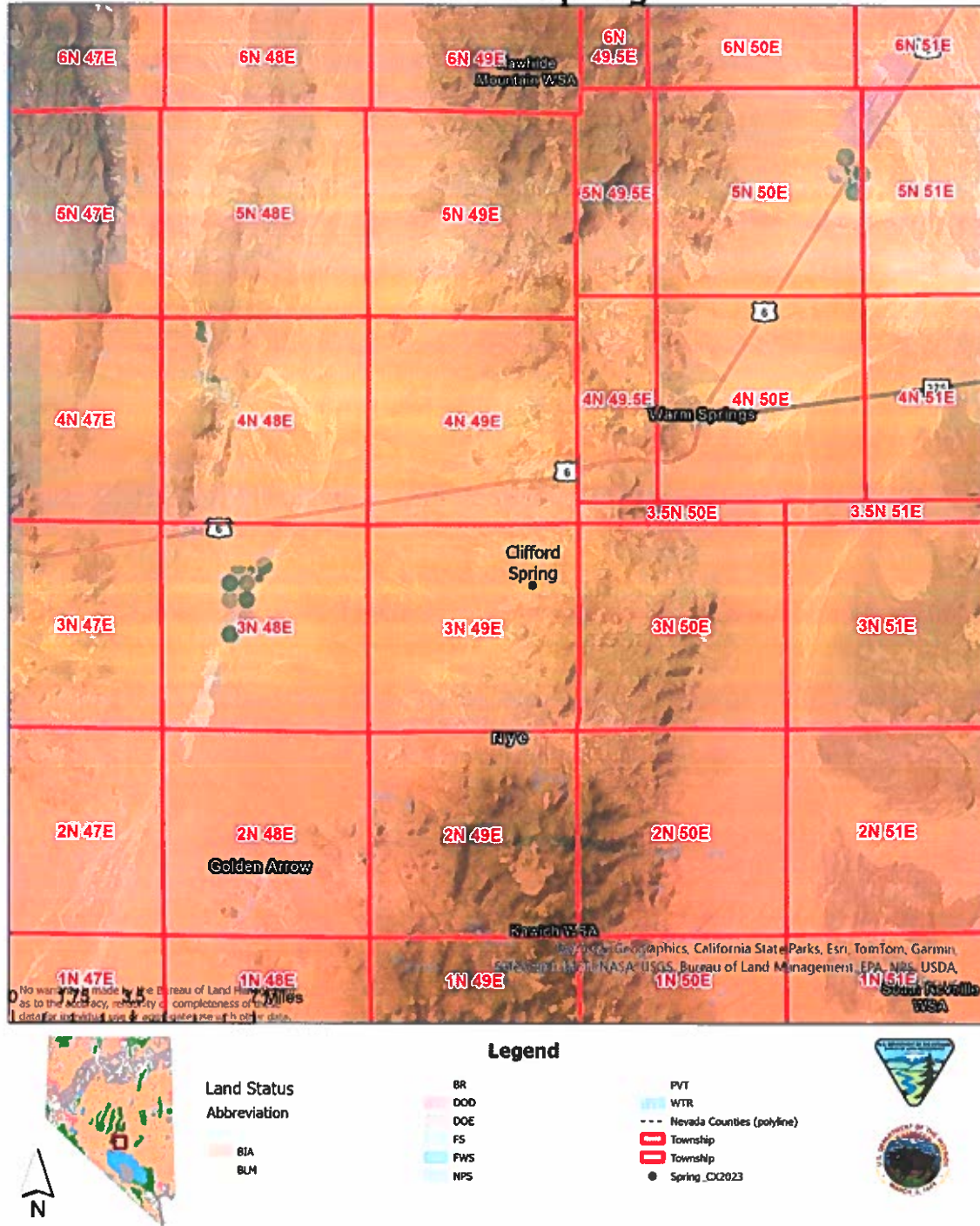


Figure 1. Map of the surrounding areas near Clifford Spring.

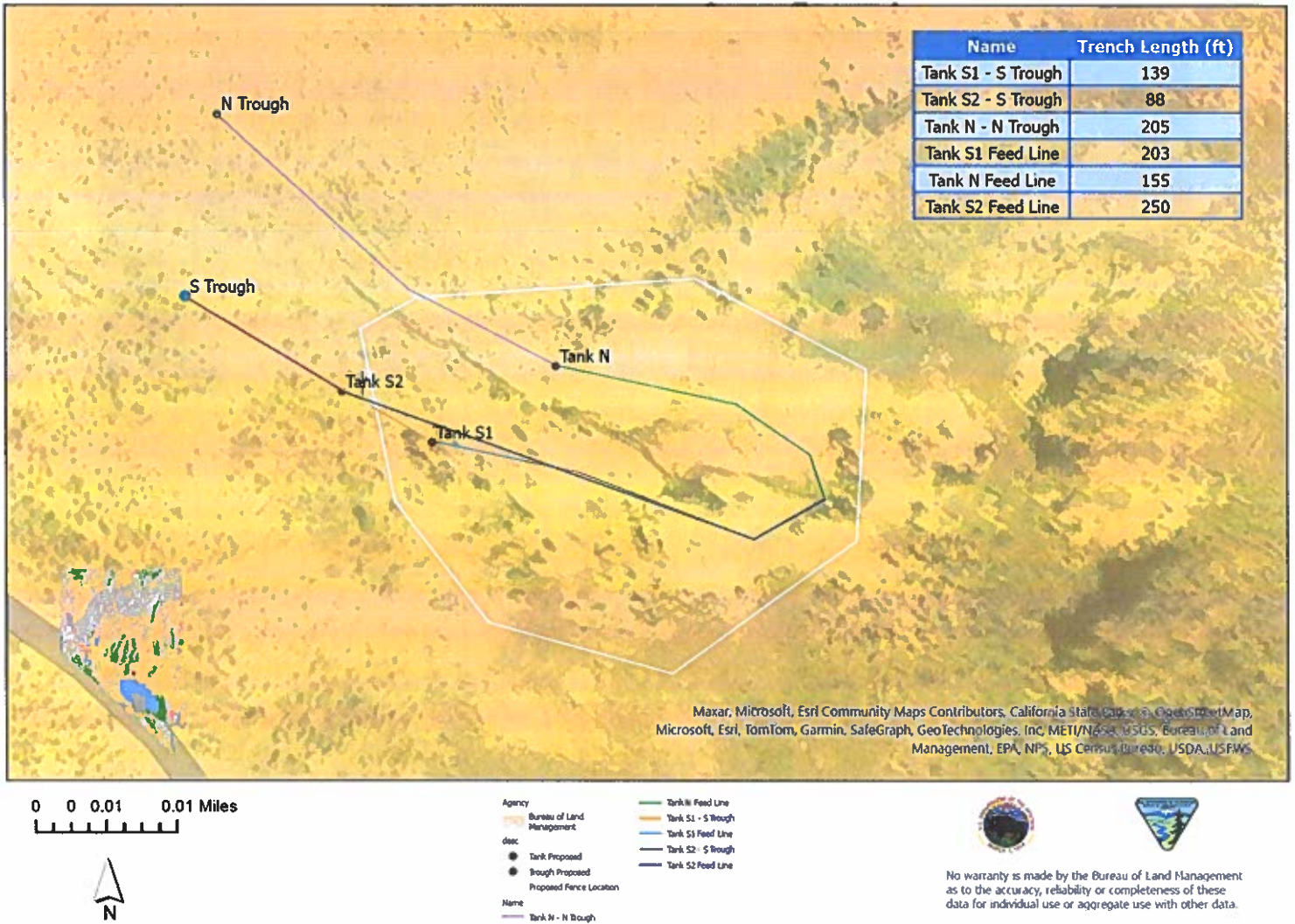


Figure 2. Map of the proposed Clifford Spring enclosure, feed lines, and water troughs. This map displays all the potential locations for the proposed infrastructure. However, only one option would be selected based on tribal consultation.

EXHIBIT B – Example Photos



Figure 3 An example of the welded drill steel exclusionary fencing.



Figure 4. An example of the welded drill steel exclusionary fencing.

Exhibit C – Site Photos



Figure 5. A photo looking downhill at the degraded spring.

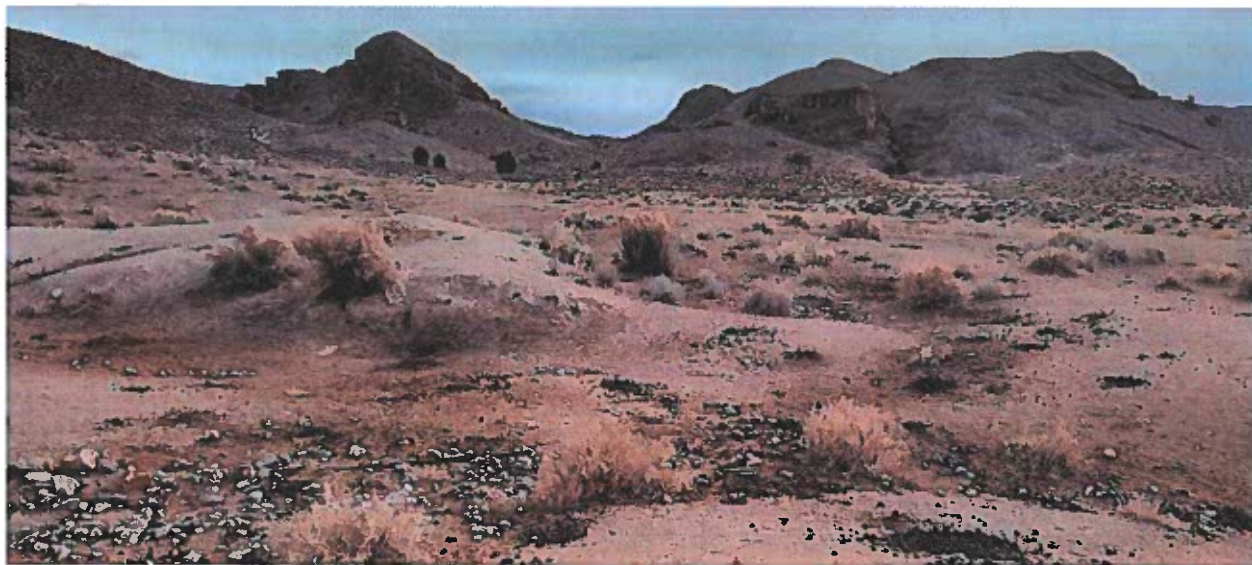


Figure 6. A photo of the spring facing south.



Figure 7. A photo of one of the few remaining seep locations where water reaches the surface and creates a small shallow pool. Three of these seeps remain at the site and all show signs of being excavated by ungulates.



Figure 8. A photo taken at the spring from a deployed game camera showing the intensive pressure it receives from wild horses.



Figure 9. The spring serves as an important source of water for a variety of wildlife in the local area including but not limited to ungulates, small mammals, and birds.



Figure 10. Competition between wildlife and wild horses have been well documented both in the literature and from field observations at this site. Emphasizing the importance of constructing this exclosure to meet the needs of both wildlife and wild horses.

EXHIBIT D – Legal Land Description

Clifford Spring

Mount Diablo Meridian, Nevada
T. 3 N., R. 49 E.,
sec. 11, SE1/4SW1/4.

