



**California Association of 4 Wheel Drive Clubs
Natural Resources Consultant - South**

Over 50 years advocating for recreation

Sept. 7, 2014

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Subject: RMG Feedback, Company Objectives

These comments are submitted on behalf of the California Association of 4 Wheel Drive Clubs (CA4WDC) and its membership. CA4WDC represents clubs and individual members within the State of California that are part of the community of four-wheel drive enthusiasts. These comments are directed to the "Company Objectives" proposal by USMC within the Shared Use Area of Johnson Valley. This document shall not supplant the rights of other CA4WDC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received to this proposed project

While the main focus of CA4WDC is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

CA4WDC supports the concept of managed recreation and believes it is prudent and appropriate management to identify areas where off-highway vehicle use is appropriate. Such use must be consistent with the public lands management plans, the Plan Standards, and all other requirements found in the Plans, as well as state and federal regulations. Recreation, especially recreation off of paved or gravel roads, is the leading growth in visitors to public lands. Improvements in the planning processes help minimize conflicts and potential resource damage while providing for recreation access to public lands.

CA4WDC has reviewed the proposal provides by U.S. Marines' Corps concerning three designated areas proposed as company objective sites in the Shared Use Area of Johnson Valley

As explained at the September 6, 2014 field tour, two of the three proposed sites will be selected as “Company Objectives” for training two months each year during times the Shared Use Area of Johnson Valley is under exclusive use by the U.S. Marine Corps for training exercises.

The Marines proposed plan is estimated at approximately 22-acres per site. These will serve as enemy-held positions during training and involve the use of small-caliber (up .50 caliber) weapons. The proposed sites will have berms of earth constructed approximately 150 meters end to end.

As noted, it is proposed that the berms be temporary in nature and at the completion of training use, the berms will be leveled and the terrain restored to natural topography. The area will be “swept” for expended shell casing and any mis-fire or other un-used rounds that may be present.

Comments have been requested to provide a preference for two of the three proposed sites and to indicate other concerns associated with the project.

GPS Coordinates of the objective areas are:

Objective #1 -116.504, 34.449402 Near Los Padres Mine

Objective #2 -116.516, 34.425999 North of Means Lake, near the entrance to Backdoor Trail

Objective #3 -116.441, 34.391399 Farther north

Comments:

1. With respect to the preferred proposed “company objective” areas, CA4WDC endorse the use of Objective Areas #1 and #2 as defined on the provided map and corresponding with the GPS Coordinates noted above.

2. With respect to other concerns associated with the project, CA4WDC does have several concerns that need to be addressed in the project planning, including potential impact to existing trails/routes in the Shared Use Area of Johnson Valley. During the field tour, USMC officials noted that a number of military vehicle types would be used during the training; including tracked vehicles such as tanks. Also noted was the construction of the proposed berms.

Issue 1 - CA4WDC recognizes that existing protocols restrict vehicles to existing routes where practicable with limited cross-country travel. CA4WDC is concerned that the potential does exist to expand the current network of trails with a series that are deemed “necessary” for conduct of the training as this is a new use of the area.

Recommendation - CA4WDC recommends that designated routes of travel be incorporated within the Shared Use Area of Johnson Valley for the movement of military vehicles to reduce the potential for ground disturbance to a minimum required to accomplish the training objectives. At the completion of each exclusive use for training period, USMC will restore all off-route by military vehicles to their original condition.

Issue 2 - CA4WDC has concerns with the use of tracked vehicles in the Shared Use Area of Johnson Valley. Tracked vehicles, by their design, are destructive and leave a wide path of ground disturbance. This excessive ground disturbance would hasten the degradation of the trails to other uses by the public and could produce circumstances for resource damage and/or public safety.

Recommendation - CA4WDC recommends that the use of tracked vehicles in the Shared Use Area of Johnson Valley be avoided. At the completion of each exclusive use for training period, USMC will restore all routes used by tracked vehicles to their original condition.

Issue 3 - CA4WDC is concerned about the construction and restoration of the berms proposed for the "Company Objective" areas. CA4WDC recognizes that construction of the berm will assist in public safety as live small arms fire would be directed into an effective backstop and limit travel of stray bullets over potentially great distances. As noted during the field tour, the berms are anticipated to be approximately 5-6 feet in height and 150 meters from end to end. Dirt for the berms would be obtained by excavating along the face of the proposed berm.

Recommendation - CA4WDC has several concerns with the proposed process.

The proposed project area is an alluvial fan with varying slope and soil conditions. Proposed Company Objective Area #1 is higher on the alluvial fan than Proposed Company Objective Area #2. Due to the soil condition difference, a berm constructed at Proposed Company Objective Area #1 contains more cobble (less sand) and a berm of the proposed size could be constructed with an overall smaller footprint than a similar sized berm constructed at Proposed Company Objective Area #2; which has soil conditions consisting of a larger amount of sand.

The soils conditions would dictate the width of excavation necessary and during the restoration, the overall berm footprint would yield a much larger potential impact area. Rather than soils disturbance limited to one blade cut width (approximately eight feet), the ground disturbance could potentially be up to 4 or 5 times that width.

CA4WDC concerns with this revolve around the potential for accelerated erosion as the water percolation characteristics of the soil are disturbed and different from the surrounding area. Additionally, the ground disturbance would increase the potential for increased PM-10 contributions to the overall region, most notably outside the exclusive use time period.

Recommendations - CA4WDC recommends that should these projects move forward, several actions are required. 1) PM-10 monitoring that collects data on a continuous basis throughout the year. No earth movement to construct berms should be accomplished without at least one continuous year of monitoring data to establish a baseline. 2) Rather than excavate on-site soil to construct berms, construct berms of a material that will stop small caliber rounds. Such berms would be placed in position for the duration of the exclusive use period and removed at the end. This action would limit the amount of earth disturbance. 3) Should use of on-site dirt be pursued to construct the berms, during the restoration process, soils replaced should be compacted to mimic pre-excavation water percolation characteristics. 4) Native vegetation will be disturbed during the training exercises and restoration of vegetation damage needs to be part of the process. 5) a soils stabilization agent should be used to lessen potential for wind and water erosion when the berms are restored to natural contours.

CA4WDC recognizes that some of these issues were addressed during the lengthy EIS review of the public lands withdrawal. However, the EIS notes that berms may be constructed. It is silent on the aspect of construction and restoration a couple of time per year were part of the impacts studied. Within that consideration, this proposal extends to scope of what was provided for public review and comment. As such, adoption of the proposed project requires a careful scrutiny.

A one-time impact of berm construction is significantly less than multiple construction and restoration efforts with in the year. A one-time construction of berms does not relieve the potential for impacts as noted.

In general, within the Shared Use Area of Johnson Valley, resource changes due to the increased high impact uses need to be mitigated and the resource damages corrected by the responsible party. It should not fall on the OHV recreation (or other stakeholders) in Johnson Valley to mitigate for nor fund restoration efforts necessary due to incidents related to the exclusive use periods of the Shared Use Area of Johnson Valley.

CA4WDC thanks your offices for this opportunity to comment on this proposed project. CA4WDC looks forward to working with the USMC and BLM so that they can fulfill their missions and the public may continue to use and enjoy the Johnson Valley OHV area.

Sincerely,

A handwritten signature in black ink that reads "John Stewart". The signature is fluid and cursive, with the first name "John" and last name "Stewart" clearly legible.

John Stewart
Natural Resources Consultant
California Association of 4 Wheel Drive Clubs