



DEPARTMENT OF THE ARMY
HEADQUARTERS, CALIFORNIA ARMY NATIONAL GUARD
9800 GOETHE ROAD
SACRAMENTO, CALIFORNIA 95827-3561

September 7, 2018

Carly Summers, Supervisory Natural Resources Specialist
Bureau of Land Management
Bakersfield Field Office
Attn: Bakersfield RMP Hydraulic Fracturing Analysis
3801 Pegasus Drive,
Bakersfield, CA 93308.

SUBJECT: Notice of Intent for Potential Amendment to the Resource Management Plan for the Bakersfield Field Office, California, and to Prepare an Associated Supplemental Environmental Impact Statement

Dear Ms. Summers:

The California Army National Guard (CA ARNG) is providing comments on the Bureau of Land Management's (BLM) proposal to prepare a supplemental Environmental Impact Statement (EIS) and a potential Resource Management Plan (RMP) amendment for the Bakersfield Field Office Resource Management Plan. The area under consideration includes the CA ARNG's Camp Roberts Military Training Site (Camp Roberts) and also identifies areas immediately adjacent to our Camp San Luis Obispo (CSLO) Military Training Site.

Camp Roberts is an approximately 43,800-acre military training site located in San Luis Obispo and Monterey Counties, California. The installation is major Maneuver Training Center for heavy and light mechanized equipment operations, air operations, and live-fire training for National Guard units as well as other reserve and active duty service components. It is currently, and for the foreseeable future, a primary West Coast mobilization center for overseas deployments. The installation also serves as a critical platform supporting the CA ARNG's state mission to provide defense support of civil authorities (DSCA).

Camp San Luis Obispo, is a state-owned CA ARNG installation covering approximately 5,600 acres. Like Camp Roberts, it provides a critical training platform for the CA ARNG's federal military readiness and state DSCA missions.

The CA ARNG provides the following comments:

1. Army Approval: Access to Camp Roberts to conduct oil or gas exploration would require the lessee to obtain a license from the Army and the CA ARNG. This decision would be subject to NEPA, which could be satisfied through tiering off of BLM's EIS (if adequate) or through a separate analysis. Given the efficiency of using a preexisting EIS to cover a future action, BLM should consider the CA ARNG and the Army as cooperating agencies in the NEPA process.
2. Military Training/Maneuver Requirements: Camp Roberts operates over 20 training ranges, 8 training sites, and airfield operations to support National Guard, Reserve, and Active Duty units. Any encroachment or degradation of training ranges, training sites, or airfield operations at Camp Roberts or Camp San Luis Obispo by any proposed oil fracking operations will be highly contested by the California National Guard. The EIS should address all potential direct, indirect, and cumulative effects to Military Training/Maneuver activities at Camp Roberts and Camp San Luis Obispo. This includes actions that may occur outside of the installation boundaries.

3. Drinking Water/Groundwater: Camp Roberts derives its domestic water from ground water wells located on the installation. Any contamination of the aquifer supplying this water would have significant negative consequences on the military mission. The EIS should address all potential direct, indirect, and cumulative effects to groundwater resources at Camp Roberts. This includes actions that may occur outside of the installation boundaries.

4. Surface Waters/Wetlands: Camp Roberts contains reaches of the Salinas, Nacimiento, and San Antonio rivers as well as numerous perennial and seasonal streams. The installation also supports various wetland habitats, including vernal pools. Camp San Luis Obispo contains reaches of Chorro, Dairy, and Poison Oak creeks, all of which lie in the upper watershed of the Morro Bay National Estuary. The EIS should address all potential direct, indirect, and cumulative effects to these waterbodies, including actions occurring outside of the installations boundaries.

5. Special-Status Species: Camp Roberts (CR) and CSLO are inhabited by several federally and state-listed threatened or endangered species. These include the San Joaquin kit fox (CR), vernal pool fairy shrimp (CR), purple amole (CR), steelhead trout (CR and CSLO), California red-legged frog (CSLO) and Chorro Creek bog thistle (CSLO).

The installations are also home to a wide range of state and federally-listed sensitive species, as well as bird species protected under the Migratory Bird Treaty Act. The installation also provides habitat for numerous non-game and game species. Camp Roberts has an active hunting program. The EIS should address all potential direct, indirect, and cumulative effects to listed and non-listed sensitive species, migratory birds, non-game and game species, and their habitats.

6. Cultural Resources: Both Camp Roberts and CSLO support significant archaeological resources and historic structures that have been determined eligible for listing in the National Register of Historic Places. Additionally, both installations contain unsurveyed areas where cultural resources may be present. The CA ARNG's Programmatic Agreement (PA) with the State Historic Preservation Officer (SHPO) addresses many routine and ongoing actions and streamlines the traditional National Historic Preservation Act (NHPA) Section 106 process on the training sites. Oil and gas exploration using hydraulic fracturing technology is not addressed in our PA and would require separate, project-specific consultation with the SHPO.

Camp Roberts and CSLO lie within the tribal territories of the Northern Chumash, Santa Ynez Band of Chumash Indians (federally recognized), and Salinan tribes. The CA ARNG consults with these tribes on all actions that may affect tribal cultural resources. The EIS should address all potential direct, indirect, and cumulative effects to cultural resources and tribal government issues.

7. Short-Term vs. Long-Term Productivity: In addition to the specific resource areas identified above, the EIS should provide a discussion of the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented as they relate to Camp Roberts and CSLO in accordance with 40 CFR Part 1502.16.

8. Coordination. The CA ARNG learned of this action through the media on September 4, 2018, which is insufficient. Moving forward we request that the BLM provide our agency with sufficient advanced notice to allow for meaningful participation in the decision making process for this action. We request that the BLM provide us sufficient notice for all meetings, document reviews, and information requests as the EIS/RMP process proceeds. Please include the following parties on your future distribution list for this action:

CA ARNG Headquarters:

Colonel Nicole Balliett, Army Division Chief of Staff
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Colonel Darin Bender, Director of External Affairs
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Training Site Command staff:

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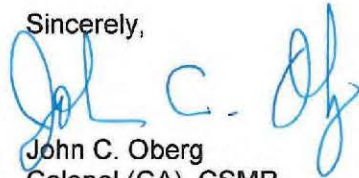
Environmental Directorate:

Colonel (CA) John Oberg, Director
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Mr. Douglas Bryceson, Acting Deputy Director/Conservation Program Manager
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Please contact our agency point of contact Mr. Douglas Bryceson should you require any additional information or to address questions regarding the submitted comments.

Sincerely,



John C. Oberg
Colonel (CA), CSMR
Director, Environmental Programs