

2026 (G26) Grants and Cooperative Agreements Program Friends of Jawbone's Preliminary Application Comments

Comments submitted by the Department of Parks and Recreation (Department) Off-Highway Motor Vehicle Recreation (OHMVR) Division to individual Grant Applicants should in no way be construed as a guarantee of successful results for the Applicant within the competitive Grants process or a commitment of funding. Additionally, the lack of comments by the OHMVR Division to any specific Applicant does not ensure successful results for the Applicant within the competitive Grant process or a commitment of funding.

Failure by the Applicant to respond to any OHMVR Division comment of their preliminary Application may be cause for eliminating that item from the Applicant's final Application.

All final Applications will be reviewed by the OHMVR Division. The OHMVR Division may, at its sole discretion, decrease the requested amount and eliminate activities pursuant with regulation Section 4970.07.2 (f)(1-5) and for Law Enforcement Projects, regulation Section 4970.15.3(b)(1-5).

If multiple proposed Projects are requesting funding for the same deliverable, and multiple projects are successful, only one project will receive funding for the deliverable.

For proposed Projects requesting Grant funding for snow and/or winter activities. Applicants must ensure the activities and/or Equipment/Heavy Equipment/Trailer requested are not and/or cannot be funded by the Department's Winter Program (commonly referred to as the Snow Grooming Program).

For proposed Projects requesting Grant funding for the maintenance of roads and/or trails, note that only roads and/or trails that allow "green sticker" Off-Highway Vehicles are allowed to receive Grant funding.

Applicants are reminded that no Grant funds and/or match can be expended, or Project activities conducted in any land owned or managed by the Department except as allowed in the Grants and Cooperative Agreements Program regulations section 4970.09 (b)(11).

General Evaluation Criteria:

- No comment.

Ground Operations: G26-04-13-G01

Project Description – Background

- No comment.

Project Description – Project Description

- The activity described as "replacing cut and damaged fences" appears to be duplicative of the activities proposed under the Applicant's Restoration Project(s). Applicant must provide a detailed explanation clearly differentiating how this activity does not overlap with the scope of work proposed under the Restoration Project(s), or remove the associated costs and language related to repairing fences damaged by illegal OHV use from this Application. Applicant is reminded that costs associated with the repair damage caused by off route travel by illegal OHV use are more appropriately funded under a Restoration Project.

Project Description – List of Project Deliverables

- #1 & 3 - Applicant is reminded that monitoring is not an eligible activity under Project Deliverable #1 or 3 but should be included under Project Deliverable #7 or Project Deliverable – Other.

Project Description – All Others

- "Describe the Size of the Specific Project Area(s) in Acres and/or Miles" – Several of the routes proposed for Ground Disturbing maintenance activities reflect the same mileage figures listed in the prior year's Application. Applicant must provide a detailed justification demonstrating why the same routes and mileage are being proposed again in the current Application.

Project Cost Estimate

- Contracts #1-5 – It is unclear how 100% of these staff position's time is being requested as a direct Project cost. It is generally expected that staff time includes agency-required trainings, administrative tasks, and other non-Project activities that are not directly related to the accomplishment of Project Deliverables. Applicant must carefully review the duties associated with each of these positions and ensure that any costs not directly related to accomplishing Project Deliverables are either moved to the Indirect Cost category or removed from the Application altogether. In addition, the proposed quantity of hours for Contract #5 appears excessive. Applicant must provide a detailed explanation justifying the quantity of hours requested and demonstrate that it is reasonable and proportionate to the scope of work outlined in the Project Deliverables, including a clear breakdown of how the quantity of hours was determined.
- Contract #2 & 3 – Time spent on Project Deliverable #1 and 3 is unclear for these line items. Applicant must clarify within the line item notes what portion of staff time will be specifically dedicated to the maintenance of OHV trails, roads, and open area.
- Contract #7 "Cartographer / Designer" – Applicant must remove this line item as it was included in the prior year's Application. The activity described as "revised to correct errors, and to respond to requests from private property owners" was also included in the prior year's Application. It is unclear how the Applicant is

anticipating additional errors or further requests from private property owners in the upcoming Grant year, and why the necessary changes cannot be completed under the Applicant's active G25 Ground Operations Project. Applicant is reminded that if BLM closes OHV routes within desert tortoise critical habitat, a Project Cost Estimate Reallocation Request may be submitted to make those specific changes under the active G25 Project. In addition, Applicant is reminded that performing baseline trail condition assessments is generally required at the time of the final Application submission and is therefore not an eligible Grant expense. It is also unclear how the results of a baseline trail condition assessment would yield changes to a public use map.

- Materials / Supplies #5 "Kiosk Maintenance" – Applicant must identify the specific location(s) of the seven kiosks proposed for maintenance under this line item. It is unclear whether the kiosks referenced in this line item are duplicative of those being serviced under the BLM Ridgecrest Project. Applicant must provide clarification demonstrating that the kiosks proposed under this line item are distinct from those included in the BLM Ridgecrest Project and that the associated costs are not being claimed under both Projects.
- Materials / Supplies #6 "Road Base" – Applicant must clarify why the proposed quantity listed in the Unit of Measure matches the figures submitted in the prior year's Application, as it is unclear whether the quantity has been determined based on the current Project's specific needs. Applicant must provide a detailed explanation demonstrating that the proposed quantity of road base materials is based on a well-defined plan that is directly tied to the scope of work outlined in the Project Deliverables. In addition, Applicant must identify the specific location(s) where the road base materials will be placed.
- Materials / Supplies #7 "Map Printing" – Applicant must remove or reduce this line item to reflect quantities needed for the 18th version of the map, as it is uncertain whether surplus copies remain from the prior year.
- Equipment Use Expenses #2, 4-7 – It is unclear how the vehicle use fees claimed for these line items do not exceed the Applicant's actual costs. Applicant must provide supporting documentation substantiating the operating and fixed ownership costs for each vehicle listed in these line items.
- Equipment Use Expenses #4 "Auger Truck" – The proposed cost for this line item appears excessive in related to the Project Deliverables. It is unclear why an auger truck is necessary to complete the activities outlined in this Project, as peeler posts are not included in the current Application and only T-posts are proposed. Applicant must provide a clear justification for the inclusion of the auger, a specific breakdown of how the proposed quantity of hours was calculated and demonstrate that both are reasonable and proportionate to and necessary for the completion of the Project Deliverables.
- Indirect Costs #2 "Administration" – Applicant's notes are inaccurate and need to be revised. In addition, the proposed quantity of hours appears excessive and duplicative of the administrative costs being incurred by IMC under the Contract line items. Applicant must provide a detailed explanation clearly differentiating the specific responsibilities, amount of time spent per task, and scope of work attributed to both IMC under the Contract line items and those proposed under

this line item, and demonstrate that the associated costs are not being claimed under both categories.

- Indirect Costs #3 "GIS & Data Management" – It is unclear why "pays for costs including all project before/after photos" is included in this line item, as before/after photos are generally document by the field crew. Applicant must provide a detailed explanation clarifying how this activity falls within the scope of this line item and demonstrate that the associated costs are not duplicative of direct field crew duties already included elsewhere in the Application.

Restoration: G26-04-13-R01

Project Description – Background

- No comment.

Project Description – Project Description

- The G26 Project Area appears duplicative of areas already included in the Applicant's G23 and G24 Restoration Projects, as well as the Bureau of Land Management (BLM) Ridgcrest Field Office G25 Restoration Project. These Projects include work within the Jawbone Subregion, and G26 includes the Jawbone Butterbreedt ACEC, which is part of the same Jawbone landscape. Applicant must clarify how the G26 Project Area is geographically distinct and identify the methodology used to ensure that no restoration sites, monitoring zones, or costs overlap. Applicant must remove language and any cost associated with this activity from the Project if there is duplication of services.

Project Description – List of Project Deliverables

- #1 – It is unclear what the size of the actual active restoration area will be. Applicant must verify the accuracy of this figure or provide a revised estimate that reflects the appropriate level of active restoration associated with illegal OHV incursion. In addition, Applicant must also separately identify any areas representing anticipated future incursions and provide distinct estimates for each. Furthermore, the statement, "Installation of erosion control features such as rolling dips, wattles, and water bars" appears to be Ground Operations activities rather than Restoration activities. Applicant must either provide additional information demonstrating how these activities meet Restoration grant criteria or remove all Ground Operations-related language and associated costs from the Project budget and scope of work.
- #2 – Applicants must provide the anticipated number of monitoring efforts for each Project Area listed under Section D: "Size of the Specific Project Area(s)...".
- #4 – Applicants must provide a clear estimate of the mileage, linear feet, or other applicable measurements of fencing and/or barriers required for the Project.
- #5 – The Deliverable appears to describe Ground Operations activities rather than Restoration activities. Applicant must provide additional information demonstrating how these activities meet Restoration grant criteria, as well as

identify the locations where public outreach and visitor services efforts will occur. If these activities are determined to be duplicative, Applicant must remove all associated language and costs from the Project budget and scope of work.

Project Description – All Others

- Attachments: Applicant is reminded to include Project-Specific Map(s) with sufficient detail for someone unfamiliar with the area to locate the Project site(s). The map(s) must also include valid GPS coordinates for all Project site locations. Additionally, Applicant may include map keys identifying active restoration areas, fencing/barriers, and other relevant Project features.
- (C) How the proposed Project relates to OHV Recreation... – Applicant must provide additional information on how the Project relates to OHV recreation and how OHV recreation specifically caused the damage proposed for restoration. In addition, “Restoring linear disturbances better confines OHV travel to the legal, designated route network” appears to be Ground Operations activities rather than Restoration activities. Applicant must either provide additional information demonstrating how these activities meet Restoration grant criteria or remove all Ground Operations-related language and associated costs from the Project budget and scope of work.
- (D) The size of the specific Project Area(s) in acres and/or miles –It is unclear what the total size is of the areas proposed for monitoring and patrolling, including both the active restoration sites under this Project and any additional areas such as newly fenced sites. Applicant must identify the location and acreage and/or miles of all areas that will require monitoring or patrolling upon completion of restoration work, and must separately identify the size and location of any additional areas outside these restoration sites, including past restoration areas and any newly proposed areas vulnerable to OHV incursions.
- (I) Except for scientific and cultural studies or planning Projects, erosion control efforts ... – Applicant must clarify the reference to “restored with native vegetation cover,” as this activity is not included in the Project Deliverables or the Project Cost Estimate. Applicant must explain how revegetation aligns with the approved scope of work and identify any associated costs, if applicable. In addition, Applicant must provide further information demonstrating how the proposed revegetation efforts will be effective within a desert environment."

Project Cost Estimate

- Contracts #1 “Crew Lead” – It is unclear what the hour breakdown is for the line item. Applicant must provide a detailed breakdown for each year.
- Contracts #2 “Restoration Crew” – It is unclear whether the hour breakdown provided corresponds to the staffing line item. Applicant must provide a detailed, year-by-year breakdown of hours to clarify how the totals were calculated. In addition, the percentage of staff time allocated to Project Deliverables is unclear. Applicant must clarify what portion of the staff member’s time will be dedicated to active restoration, monitoring, signage, fencing/barriers, public outreach, and other relevant restoration activities. Furthermore, the activity described as

“updating entrance kiosks with current OHV trail maps and QR codes to mobile trail apps” appears to be an indirect activity, as it does not directly relate to the completion of the Project or to Restoration activities. Applicant must explain how this activity directly supports the proposed Project. If the activity is not directly tied to Project deliverables, Applicant must either remove this language entirely or relocate both the description and the associated costs to the Indirect Cost category.

- Contracts #3 “Trail Monitor” – It is unclear whether the hour breakdown provided corresponds to the staffing line item. Applicant must provide a detailed, year-by-year breakdown of hours to clarify how the totals were calculated.
- Contracts #5 “Archeologist” – It is unclear whether the hour breakdown provided corresponds to the staffing line item. Applicant must provide a detailed, year-by-year breakdown of hours to clarify how the totals were calculated. In addition, the number of hours requested appears excessive for the scope of work described. Applicant must provide additional justification explaining why the total hours are necessary.
- Materials / Supplies #5 “Fuel for Hand Tools” – Applicant must list the specific hand tools for which the gasoline is intended to be used for this Project.
- Equipment Use Expenses #1 “4x4 Vehicles - Mileage” – Applicant must separate transporting miles from operating miles into two separate line items. Transporting miles apply only to travel between the vehicle yard and the Project site, while operating miles apply only to mileage accrued while performing Project activities within the Project area. Applicant must provide a revised breakdown that clearly identifies total transportation and operational miles per day for each vehicle included in this line item. In addition, Applicant must provide a more detailed description of what “Operations activities” entail.
- Equipment Use Expenses #2 “4x4 Vehicles - Vehicle Use Operations” – The percentage of vehicle usage allocated to Project Deliverables is unclear. Applicant must clarify what portion of each vehicle will be dedicated to active restoration, monitoring, signage, fencing/barriers, public outreach, and other relevant restoration activities. In addition, personnel transportation expenses are reimbursed solely through the approved per-mile rate. Applicant must remove any language or costs associated with separate transportation charges.
- Equipment Use Expenses #3 “Auger Truck” – It is unclear why an auger truck is required for this Project, as no peeler posts are included, and many vegetation and restoration techniques can be completed without the use of an auger. Applicant must provide additional justification explaining why an auger truck is necessary, how it will be used within the Project scope, and why manual or alternative methods are insufficient. In addition, compared to like Projects, the proposed cost for this line item appears excessive. Applicant must provide a clear explanation of how the cost was determined.
- Equipment Use Expenses #4 “Heavy Equip Fuel” – Applicant must clarify whether the fuel request covers the truck, the auger, or both. It is also unclear whether the auger is a standalone powered unit or if it requires power from the truck’s engine, hydraulic system, or its own separate fuel source.

- Others #1 “Jack Hammer & Generator” – Please over verbiage and cost for “Jack Hammer” to Materials / Supplies #3 “Hand Tools.” In addition, Applicant must provide additional details to justify the need to purchase a generator every Grant cycle, as the life of a generator is more than three years.
- Others #2 “Bit, Teeth, Fish Tail for Auger Truck” – Applicant must move this line item to the Other Cost category.

Education and Safety: G26-04-13-S01

Project Description – Background

- No comment.

Project Description – Project Description

- Applicant must describe what is new or different in the data hub, such as added trails, changed routes, or updated boundaries.

Project Description – List of Project Deliverables

- No comment.

Project Description – All Others

- Location where training/services will be conducted – Applicant must provide a clearly defined and accurate estimate of where the field testing will occur to align with the Project Cost Estimate.

Project Cost Estimate

- Contracts #1 “Programmer/ GIS Tech/ Designer” – Applicant must revise the methodology used to support the QTY and Rate. In addition, Applicant shall revise the narrative to indicate the contractor.
- Equipment Use Expenses #1 “4x4 Vehicle – Mileage” – Applicant shall revise the narrative to indicate the activity differences in ‘Transportation’ and ‘Operations’ mileage. If the activities are different than Applicant must create separate line items. Applicant is reminded that Equipment operation is limited to 150 miles per day as a direct cost, with the remaining cost as match and Equipment transportation is limited to 100 miles per day as a direct cost, with the remaining cost as match.
- Indirect Costs #1 “Administration and Supervision” – Applicant must provide a clear explanation of how the cost was determined, including the precise scope and amount of work to be conducted. For any Staff positions included in this line item, Applicant must utilize the hourly rate and quantity of hours as the unit of measure to clearly demonstrate how the associated costs were calculated. If helpful, Applicant may break this line item out into multiple Indirect Cost line items to clearly identify and separate the various costs.