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RE: Addendum to ASA Comments dated June 25, 2002 on the March 2002 DEIS for a Proposed ISDRA RAMP

Dear Mr. Komatinsky,

After participating in the Visitor Supply Workshop, conducted by BLM in El Centro on June 24<sup>th</sup>, the ASA has become better educated on ROS and Visitor Supply concepts which are discussed in Chapter 3.0 of the DEIS. We therefore offer the following additional comments.

Please consider the enclosed comments as an addendum to the ASA comments dated June 25, 2002. These additional comments are not intended to replace or contradict any of the comments previously submitted by the coalition of OHV organizations dated June 13, 2002 or the ASA comments dated June 25, 2002.

We found Dr. Haas' comments during the Workshop and his fifteen-page draft handout dated February 15, 2002, entitled "Affected Environment" especially enlightening. The draft provides several meaningful concepts which should be incorporated into the DEIS and DRAMP. In particular, we noted that the Recreation Opportunity Spectrum concept is intended to provide the recreation managers with a tool for rational decision-making, which commonly includes "stakeholder" involvement.

Management actions should be founded on best possible information regarding the desired recreation experience. Stakeholder input is a commonly accepted ingredient in the decision process. It is our understanding that NEPA requires it. We learned that "harsh" management actions are not customarily imposed without credible supporting data. All of these observations are in concert with the spirit and intent of the comments that were submitted in the original ASA comments dated June 25, 2002.

The Workshop handout material that begins on page 8 with the last paragraph regarding "Sound professional judgment rely on ..." and continuing through item 12 on page 10 is particularly appropriate and is quoted below.

*“Sound professional judgment relies on many informational inputs and those particularly relevant to visitor capacity decision might include:*

- √ *management objectives (including all legislative and policy guidance)*
- √ *desired future conditions and quality standards (resource, social, management);*
- √ *current and future recreation demand (who, where, what, when, how, why);*
- √ *current resources, conditions, uniqueness, capability, trends;*
- √ *current management capability and suitability;*
- √ *current type, amount, and design of facilities and infrastructure;*
- √ *appropriateness (compatibility) of current or proposed recreation opportunities;*
- √ *regional supply of the same and similar recreational opportunities;*
- √ *foreseeable changes in recreation or non-recreational uses;*
- √ *existing allocations to permittees and other land uses/users;*
- √ *level of importance of the visitation issues and concerns;*
- √ *potential for natural or cultural resource impairment;*
- √ *type and amount of best available science and information;*
- √ *expected quality of monitoring program;*
- √ *level of uncertainty and risk surrounding consequences of decision.*

*The Administrative Procedure Act (1946: 60 Stat. 237, 5 U.S.C.A.) set forth the legal standard that decisions must be principled and reasoned; that is, arbitrary decisions are in violation of federal law. Professional principles help meet this responsibility by clarifying institutional values, philosophy, and perspectives. They serve as a guide and rule of thumb for making decisions and taking action. And very importantly, they help stakeholders to understand and meaningfully participate in a planning process.*

*Below are principles that reflect important and central values for visitor capacity decision making. Full and deliberate consideration of these principles will contribute to a logical, reasoned, transparent, and defensible decision.*

- 1. Management direction defines visitor capacity; regardless of whether the management direction or capacity is explicitly stated or not stated at all.*
- 2. A visitor capacity helps to sustain the integrity of natural and cultural resources, and the important recreational and non-recreational benefits they afford to local, regional, and national publics.*
- 3. A visitor capacity is a complex decision that is based upon sound professional judgment, defined as a decision that has given full and fair consideration to all appropriate information, and is based upon principled and reasoned analysis, the best available science and expertise, and is in compliance with applicable laws.*
- 4. A visitor capacity decision is made by a responsible official as part of a public planning process, and may benefit from the thoroughness and legal sufficiency afforded by a NEPA-compliant planning process.*
- 5. A visitor capacity quantifies the supply of available visitor opportunities that an area can accommodate, and may also address the allocation of opportunities across the variety of affected visitors, types of recreationists, commercial operators, educational programs, scientists, and others.*
- 6. A visitor capacity decision considers the larger regional landscape and system of opportunities affecting the particular area of recreation concern.*
- 7. A visitor capacity provides clarity for focused dialogue and analysis of consequence of the proposed management alternatives under consideration in a planning process.*

8. *A visitor capacity decision uses a sliding-scale rule, whereby the level of analysis is commensurate with the potential consequence of the decision.*
9. *A visitor capacity serves as a trigger or signal for managers, permittees, general public, and all stakeholders.*
10. *Visitor use approaching a capacity triggers consideration of a full range of reasonable management responses.*
11. *A visitor capacity decision needs to be adaptive to new science, information, uses, technology, trends, conditions, and other circumstances of importance.*
12. *The effectiveness of a visitor capacity depends on an adequate program of monitoring that is commensurate with the potential consequences, and risk and uncertainty at hand “*

Haas went on to state that “spike days” are to be ignored. Anomalies will occur but capacity should NOT be built to accommodate them and triggers<sup>1</sup> should NOT be activated because of them. At the ISDRA, there are six major holidays and their associated “shoulder days.” Capacity should be designed to provide for the majority of the season, otherwise we would have infrastructure sitting idle most of the time. It does not make sense to provide a capacity that occurs only 9% of the time. Quoted below is Dr. Haas’ rationale from his handout at the June 24 Workshop.

*“Visitation to Imperial Sand Dunes is unevenly distributed, which provides both a management challenge and opportunity. Fifty percent of the visitation occurs in approximately 9% of the visitation season (i.e., on 18 holidays days out of 211 days in the season). These holidays are significant spikes in visitation, and can be viewed as anomalies or inconsistencies relative to the other 91% of the season. The high use holidays are not so much a capacity problem as a challenge of enforcing California law and BLM regulations, visiting education and stewardship, and marketing and programming special events in an effort to redistribute to other times.”*

Additionally, as stated by Dr. Haas that day, the core intent of ROS triggers is to determine and signal the need for more visitor supply but not act as a deterrent as presently formatted in the DEIS. Haas put forth the analogy of a parking lot, golf tee off times, and a restaurant where there are fixed assets: campsites being the case at the ISDRA. His position is that this, along with other factors, is what defines “capacity”. Haas was emphatic stating several times, “Capacity does not mean closing the doors.”

This capacity needs to be increased when a trigger has been reached I.E., the parking lot would purchase more land for more parking spots, the restaurateur would add on to his establishment to provide more seating and kitchen capacity and the golf course may extend their hours or shorten the time between tee offs. This is the true intent of triggers and capacity.

It is obvious that CH2MHILL erred grievously in its interpretation of what capacities and triggers are and how they should be applied. We strongly encourage that the aforementioned

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<sup>1</sup> Since these comments relate to an area of significant importance which is not directly addressed in the DEIS please consider specifically including these comments as a means of implementing the preferred alternative in the DEIS. Please also consider them as comments pertaining to ROS in the DEIS. It is our desire that these comments be included in the NEPA process. It is our expectation that these comments and the BLM’s responses thereto will appear in the appendices of the final EIS and RAMP.

information provided by Dr. Haas at the Workshop and in his February 15, 2002 draft be reconsidered for inclusion in the final EIS and RAMP.

**AVAILABLE CAMPING SITES AND TOTAL CAMPERS FOR EACH MANAGEMENT AREA AND CAMPGROUND.** Following the extensive workshop discussion that relates to Table 2 on page 43 of the DRAMP, the ASA developed the following revised table. This new Table is based on our physical study of the area and aerial photographs.

A group of OHV enthusiasts spent many hours measuring representative campsites in the ISDRA locations defined in the DEIS. This study represents the current physical conditions and the desired recreation opportunity sought by ISDRA visitors. You will note that we have omitted the last column which defines the “Number of Campers per Campground” since it is our belief that the critical factors are “Campsites” and “Vehicles.” In essence, the de facto capacity is the number of vehicles that existing facilities can accommodate at the ISDRA and not the number of visitors.

The ISDRA visitor capacity is a function of the space available to camp and the size and number of recreational units (tents, recreational vehicles, trailers, & OHVs) and is not directly proportionate to the number of people. Further studies need to be conducted to determine if the nationally accepted figure of 3.5 people per vehicle is an accurate estimate: we believe that a lower value is appropriate for the ISDRA. We further believe that recreation use monitoring will be more effective and more accurate based on a count of “recreational units.” Moreover, we believe that virtually 100% of the campsites are available all the time since there is no maintenance or other reason that would preclude any given site from being used at any time. Therefore, the “Reasonable Number of Usable Camp Sites” would be equal to the “Maximum Number of Camp Sites.”

We have included several photos to illustrate the type of camping experience that we believe to be applicable to each of the management areas set forth in the following table. Please note that while many ISDRA visitors prefer the “wagon train circle” campsite, this expansive campsite footprint is generally compromised during the high visitor use holiday periods as visitors take actions to accommodate each other. Several layers of the original ring develop eventually blurring the original ring and the rings of adjacent campsites.



Buttercup Campground



Roadrunner Looking North



Pad 4



Camping Pads



South Loop of Gecko Campground and Gecko Road at Bottom



North Loop Of Gecko Campground and section of Gecko Road at Bottom



Random Stretch of Gecko Road



Pad 2.5



Cement Flats



Osborne Overlook



Gecko Campground looking North – Gecko Road Upper Left



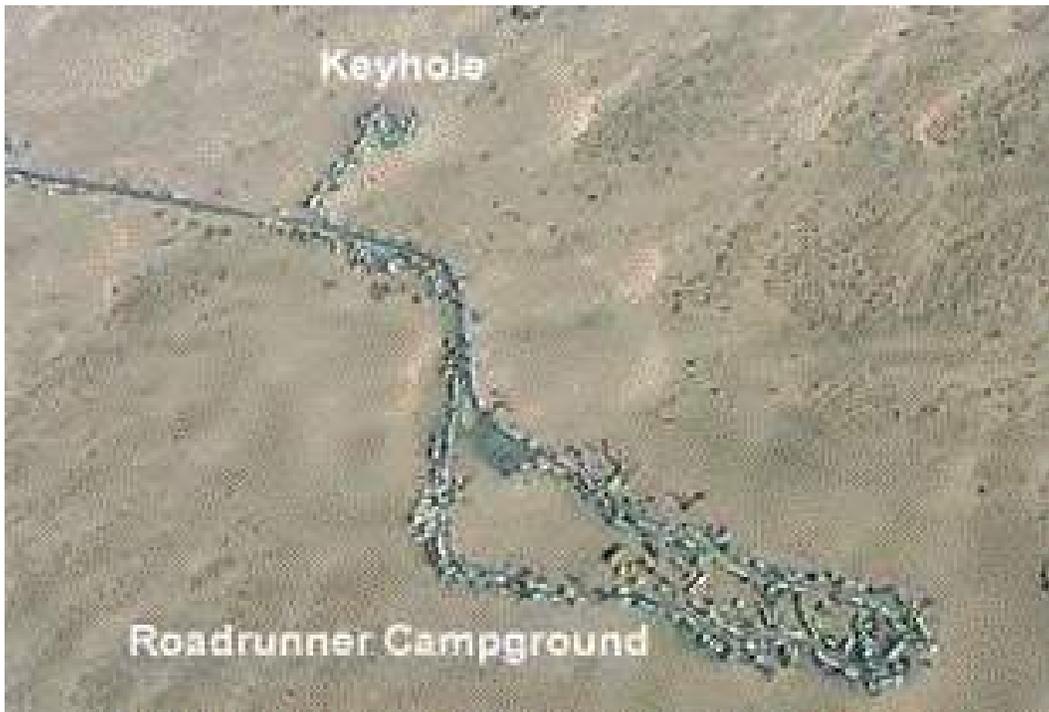
Camping Pads



Dune Buggy Flats



Random Campground in South Dunes – note “wagon circle” in upper right



Glamis Flats

**ASA PROPOSED**

**TABLE 2  
AVAILABLE CAMPING SITES AND TOTAL CAMPER'S FOR EACH MANAGEMENT AREA AND CAMPGROUND**

<b>MANAGEMENT AREA AND CAMPGROUND</b>	<b>Desired ROS Class</b>	<b>Number of Acres for Overnight Group Camping</b>	<b>Number of Acres per Camp Site</b>	<b>Maximum Number of Camp Sites</b>	<b>Reasonable Number of Usable Camp Sites (100% of Max.)</b>	<b>Number of Vehicles Per Campground (Assumes 6 Vehicles per camping site)</b>
<b>Gecko Management Area</b>						
Cement Flats	Rural	4.00	0.25	16	16	96
Camping Pads 1-5	Rural	13.00	0.25	52	52	312
Gecko Campground	Rural	41.00	0.50	82	82	492
Keyhole Campground	Rural	0.50	0.25	2	2	12
Roadrunner Campground	Rural	12.00	0.25	48	48	288
Subtotals		70.50		200	200	1200
<b>Buttercup Management Area</b>						
Buttercup Campground	Rural	69	0.25	276	276	1656
Midway Campground	Rural	6	0.25	24	24	144
Greys Well (dispersed area)	Rural	357	0.50	714	643	4284
Subtotals		432		1014	1014	6084
<b>Mammoth Management Area</b>	Semi-Primitive Motorized	1000	10.0	100	100	540
<b>Glamis Management Area</b>	Roaded Natural	2014	0.5	4028	4028	24168
<b>Ogilby Management Area</b>	Roaded Natural	1539	1.0	1539	1539	9234
<b>Dune Buggy Flats Management Area</b>	Roaded Natural	1800	0.5	3600	3600	21600
<b>North Algodones Dunes Management Area</b>	Semi-Primitive Non-Motorized	32240	1280.0	25	25	
<b>Total</b>		39095.50		10506	<b>10500</b>	<b>62826</b>

The BLM has estimated that on major holiday weekends that there are between 190,000 and 240,000 visitors at the ISDRA. The attached aerial photographs and the numbers in the chart above corroborate this. Even with a casual count, one can readily see that there are far more than the 15,808 vehicles as stated originally in Table 2. Moreover, many areas of the ISDRA are not depicted in the attached photographs: Mammoth Wash, Ogilby, the Wash Road, etc. areas are absent. Historically, these areas support a great percentage of the visitor supply.

When a more precise visitor capacity is done as per Dr. Haas and ROS guidelines, we feel this will become plainly evident. We feel the capacity demonstrated above is more accurate than that provided in the DRAMP.

“Triggers” are an important decision tool. This tool is NOT intended to be used exclusively to limit visitor capacity or attendance as structured in the DEIS and DRAMP. We encourage the application of triggers to be expanded to activate management review that could result in a change in design, location, type, or addition of facilities and infrastructure.

A review of concepts embodied in the “----Draft ---- Work in Progress” distributed at the workshop clearly indicates that the Department of Interior is in the process of developing recreation management tools, which will be applicable and useful in managing the ISDRA. Therefore, we strongly recommend that no “harsh” or “radical” management actions be implemented until good data is available and until the **Federal Interagency Task Force on Visitor Capacity on Public Lands** has completed its deliberations.

The ISDRA planning must be based on creditable data. The implementation of the plan must be measurable and the operating unit must be held accountable. Therefore, the ISDRA EIS Record of Decision (ROD) must provide a yardstick to measure these elements of planning and implementation. The ROD in the final EIS, and thus the RAMP, should set forth a structured procedure that the BLM will follow in developing a “**ROS Implementation Plan.**” Any plan to implement a ROS should include at least the following:

- Monitoring and Data Acquisition Procedure
- Management Area Precise Boundary Definition
- Precise Determination of Campground and OHV Staging Area Acreage
- Explicit Trigger Definitions and Actions
- Expansion Plans for Camping and OHV Staging Areas
- Well Defined Prescriptions for Stakeholder Participation
- Specific Provisions for Implementation Accountability

Sincerely yours,

J. R. Seaver  
Encls. Comments by David P. Hubbard

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