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CC. Bob Mason  
American Sand Association

Subject: **Comments on the ISDRA Draft RAMP of March 2010**

In response to the American Sand Association, I reviewed the document in question to assess its adequacy in addressing visitor capacity in the Imperial Sand Dunes Recreation Area. My summary conclusion is that the BLM's ISDRA Draft RAMP does not address visitor capacity.

What follows is a list of observations

1. The concern about visitor capacity is alluded to frequently in many statements and sections throughout the RAMP: quality experience, crowding, noise, medicals, fatalities, dust, arrests, citations, and economic impacts. That is, the RAMP does a good job in diagnosing that there is a visitor capacity problem in the ISDRA.
2. The phrase "visitor capacity," or any alternative phrase (e.g., recreation carrying capacity) common in the outdoor recreation planning profession, only appears once in Volume 1 & 2. There is no mention of visitor capacity where one might expect to see it reported and analyzed such as in the description of alternatives, affected environment, environmental consequences, or glossary.

The absence of addressing visitor capacity is contrary to the professional recreation planning principles adopted by the National Association of Recreation Resource Planners.

3. In Volume II, Issue Summary A-3, it lists the issues and concerns that emerged during the public scoping process. It states that these items “will be considered for analysis in the RAMP/EIS.” The second to last concern so listed is “The question of visitor capacity.” This is the only reference to visitor capacity that I found in Volume 1 & 2.

Curiously, in Volume I, under Planning Issues 1.3.2., the concern of visitor capacity found in Volume II is not listed. That is, visitor capacity is not addressed in the plan or EIS.

This inconsistency between Volume I & II and the lack of attention to visitor capacity, particularly when it surfaced as an issue in the scoping process, leads me to conclude an arbitrary action was taken to avoid a substantive “hard look” at the real ISDRA situation.

4. The visitor capacity is the supply of available opportunities (e.g., campsites, visitors) for a location while current visitation is one measure of the demand. In this effort, there are two different metrics used for demand and supply. Recreation demand is measured by the current number of visitors with no projections based upon socio-economic/demographic trends. Recreation supply (i.e., visitor capacity) is alluded to by the number of acres allocated as open, limited, or closed.

There are two problems here. The measurement of visitor capacity as the “available acres” is not a standard metric within the recreation resource planning profession. Plus, when the measurement of demand (i.e., visitors) is different than the measurement of supply (i.e., acres), it is akin to comparing “apples and oranges” which is ineffective and confuses both the agency and public.

In the previous RAMP/EIS, recreation demand was measured and reported as the number of overnight camping parties; recreation supply (i.e., capacity) was measured as the “number of available campsites.” This permitted for a simple understanding of current recreation “demand/supply” in different locales of ISDRA.

5. Visitor capacity is, by default, specified for those areas identified as “closed”; that is, while not so stated, the visitor capacity is zero. The visitor capacity for the “open” or “limited” areas is not specified in any fashion.
6. In the Economic Methodology 4.18.1.2.1., Table 4-10, there is reported that the number of tow vehicles from the current situation presented in alternative 2 (350,000 vehicles) would increase to the number of tow vehicles estimated in the preferred alternative 8 (532,000 vehicles). This 50% increase in recreation demand is not analyzed or discussed in any other section. It defies professional logic to assume that such an increase in visitation will not affect the current crowding, noise, conflicts, resources, medicals, fatalities, visitor satisfaction, quality experience and other issues generally discussed in the document.

Future projected recreation use, and its consequences, is a fundamental consideration to any visitor capacity analysis or in comprehensive public planning process.

7. In the BLM Planning regulations, Section 1610.4-4 Analysis of the Management Situation, it indicates that the analysis (inventory) should include the estimated sustained level of various goods, services, and use that may be attained.

Recreation use is a multiple use recognized by the BLM and is recognized as a significant public service on the ISDRA, yet the RAMP is silent on the estimated sustain level (i.e., capacity) that may be obtained.

8. In the BLM Planning regulations, Section 1610.4.5 Formulation of Alternatives, it indicates that the No Action alternative should be considered---that is, the continuation of the present management prescription set for in the 2003 RAMP.

In the 2003 RAMP, visitor capacity was addressed. Yet, in this draft RAMP none of this information, analysis, and 2003 decisions about visitor capacity is carried forth. That is, the BLM did not duly consider and analyze the No Action alternative when it comes to visitor capacity.

The recreation portion of this plan and EIS is very general and lacks being comprehensive, substantive, or having a systematic and rigorous analysis. The “hard look” at one of the most central issues in recreation management---visitor capacity---was not done. It is not possible for the public, local communities or cooperating agencies to understand what the proposed visitor capacity is across each alternative starting with the No Action, let alone the evaluation of effects from these proposed levels.

I believe this draft RAMP is professionally unacceptable, is in violation of BLM planning regulations, and not legally sufficient in terms of Administrative Procedures Act and the National Environmental Policy Act.