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May 2, 2009

Marlene Finley
Designated Federal Official,
Pacific Southwest Region Recreation RAC
1323 Club Drive
Vallejo, CA 94592

Dear Ms. Finley,

The American Sand Association (ASA) www.americansandassociation.org was formed in 2000 and is a volunteer-driven, non-profit organization of approximately 36,000 members dedicated to preserving the use of public lands for sand sport enthusiasts' use, improving OHV safety, and promoting responsible land use. The majority of the ASA members recreate at the Imperial Sand Dunes Recreation Area (ISDRA).

Since the inception of the ASA, it has been an enthusiastic partner of the Bureau of Land Management (BLM). ASA volunteers have contributed many hours in support of BLM public outreach programs. In cooperation with the United Desert Gateway (UDG) communities, ASA has funded or coordinated in-kind contributions that have reduced the operating cost of the ISDRA. The ASA has been recognized as a valued partner by the BLM. Former Director Kathleen Clarke presented the Department of Interior's Four C's Award and the California State Director Mike Pool acknowledged the ASA's partnership initiative with Director's Recognition Award. Enclosed is the fifth annual "Partners in Action" reported dated September 2008 that enumerates the history and extent of the ASA partnership initiative. You may view the report on the ASA website at:

<http://files.americansandassociation.org/files/partnersinaction/PartnersInAction2008FINAL.pdf>

The ISDRA is near complete dependency on Special Recreation Permit Fee (SRP) revenue to provide visitor service, facility maintenance and recreation facility improvements. Therefore, it is important that the public understand the rationale employed by the BLM El Centro Field Office (ECFO) in the determination and justification for the ISDRA SRP fee. The ASA relies on the California Desert District Advisor Council (DAC) member Dick Holliday and representation on the former ISDRA Technical Review Team (Recently reorganized as the DAC ISDRA Sub Group) to provide the information required to analyze BLM ECFO fee recommendations to the California Recreation Resource Advisory Committee (RRAC).

With the encouragement and considerable effort by DAC member Dick Holliday, the ASA has reviewed the ECFO rationale for the proposed ISDRA fee increase. Please be assured that the ASA does not desire to assume an adversarial role in this matter. The ASA has been, and will continue to be an advocate of BLM management. Since the ISDRA is funded primarily with SRP fee revenue it is imperative that the land manager provide open and transparent communications with the public.

The following items/questions have been identified:

1. Has BLM made an in-depth review of expenses to identify opportunities to reduce cost?
2. Do ISDRA expenses reflect reductions in operating cost commensurate with the decline in visitation?
3. Has BLM considered opportunities to partner with the local community, Imperial County or the UDG in effort to reduce operating cost are not apparent. For example trash service cost was reduced by approximately \$75,000 for the first four months of 2009 through outsource contractual arrangements via the County. A similar partnership in 2009-10 could reduce trash service cost by up to \$150,000 per year. Opportunities to outsource other services such as toilet pumping may yield similar savings.
4. Visitor service is not consistent throughout ISDRA. For example, recreation areas such as Ogilby and Dune Vista do not have trash service however the SRP fee is the same for all ISDRA visitors in all camping areas.
5. Visitor services, particularly emergency medical service and law enforcement are non existent on several off-holiday weekends however the SRP fee is the same throughout the season.
6. Currently the ISDRA SRP fee is being administrated as a vehicle admission permit and as such is not being legally collected per the Federal Lands Recreation Enhancement Act (FLREA). This fee is being charged on all vehicles whether they are used for "motorized recreation use" or simply travel to the recreation area. We believe that the BLM should charge these fees on the vehicles that are actually using the area for "motorized recreation use" and not charge fees for simple travel on area roads by non off-highway vehicles.

The ASA opposes the BLM recommendation to increase the ISDRA SRP fee because the BLM did not provide adequate information with sufficient notice to permit the ASA membership to analyze the recommendation. The ASA believes the BLM did not comply with the public involvement recommendations contained in the BLM Guidelines for implementing the Federal Lands Recreation Enhancement ACT.

We ask the RRAC not approve an increase in fees without enough information and time to make an informed decision. Please be advised that I will attend the May 2009 RRAC meeting in Vallejo, CA. Please consider my request to address the RRAC on behalf of the ASA membership.

Sincerely,

Bill Jones,
Chairman

CC: BLM CA Desert District Advisory Committee (DAC)
BLM ISDRA Technical Review Team (TRT)/DAC ISDRA Sub Group

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