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August 4, 2010

RAMP Team Leader
Bureau of Land Management
1661 S Fourth Street
El Centro, CA 92243

Subject:

Comments on the March 2010 Draft Recreation Management Plan (DRAMP) and Draft Environmental Impact Statement (DEIS) for the Imperial Sand Dunes Recreation Area (ISDRA)

Dear RAMP Team Leader

Of the alternatives discussed in the DEIS, the American Sand Association (ASA) prefers Alternative 1. However, the ASA believes that some of the other alternatives, notably Alternatives 7 and 8 each have attractive features which could be combined into a potentially effective hybrid. Realigning the irregular boundaries of the Alternative 8 proposed *Astragalus magdalenae* var. *peirsonii* (PMV) critical habitat (CH) closures, increased signage and law enforcement during exceptional rainfall years along with clearly marked pass-through routes would provide a more manageable alternative.

The ASA respectfully requests that Bureau of Land Management (BLM) consider and assess such an alternative in the Final EIS. The ASA's support of a hybrid alternative will depend on the features that alternative would contain and the impacts it would create. The proposed consideration of "hybrid" alternative is provided in response to the last sentence on the first page of DRAMP "Abstract" which states ***"The proposed decisions under this alternative (# 8) could be identical to those under one of the other alternatives presented or could be a combination of the features from several of the alternatives."***

The DRAMP has serious deficiencies. Specifically numerous proposed actions and recommendations are not supported by data germane to the proposal. The DRAMP is fraught with **superficial** and **incomplete** data particularly in the coverage of the biology and ecology of the PMV. The BLM has chosen to ignore a large body of published information and data regarding the distribution and ecology of the PMV. This omission renders many of the DRAMP recommendations invalid.

Volume II of the DRAMP and the DEIS includes several maps that among other things define the “OHV Management Areas” for the proposed alternatives. These maps do not provide sufficient detail to allow the public to comment on the proposed alternatives. BLM publishes the latitude and longitude coordinates for the camp grounds and places of interest at the ISD. Without similar coordinates for the boundaries of the proposed closures the public cannot evaluate the impact on OHV activity and make meaningful comments.

The BLM has a formidable task in preparing the DEIS and the DRAMP. The laws, regulations and guidelines that BLM must adhere to in prepare these documents are numerous. Notwithstanding these guidelines it is incumbent on the federal agency to prepare a document that is understandable by the general public. The organization of the document is **not “reader friendly.”** The redundant and inconsistent presentation of recommendations and proposals renders this document impossible for most of the interested public to understand and provide comments.

The rainfall-triggered camping closure of Dunebuggy Flats (DBF) **lacks sufficient rational** to support this major action. This proposal presumes that BLM is incapable of enforcing the closures. This proposal ignores historical closure compliance and assumes that BLM cannot provide the required enforcement resources.

The need for public safety CH pass-through corridors is **not acknowledged.** The preferred CH boundaries do not consider the topography of the dunes as it relates to public safety.

The camping closure on the east side in the microphyll woodland habitat is **not supported by any evidence** that historical camping has damaged the habitat or otherwise affected species that reside in this habitat. Appendix “O” regarding bird populations provides no conclusive evidence in support of a camping closure.

Enclosed with this letter are specific and detailed comments provided in support of the foregoing observations. Also enclosed with this letter is a DVD narrated by ASA attorney David Hubbard which is intended to be considered as additional comments. It is well understood that the ISDRA is a popular and unparalleled venue for OHV recreation. However, given the vastness of the ISDRA’s dune system, it is sometimes difficult to place OHV activities in their proper spatial context. To assist in this effort, the American Sand Association (ASA) has prepared a DVD which (1) visually depicts where recreational activities take place within the ISDRA, and (2) shows the extent to which those activities intersect and affect key biological resources at the dunes, most notably the PMV. The DVD also includes a narrative component that explains the visual images presented and discusses the many technical studies conducted at the ISDRA since 1998. We submit this DVD to provide a visual accompaniment to our comments, and we request that it be include in the administrative record.

Yours Truly,

A handwritten signature in black ink that reads 'Bob Mason'.

Bob Mason, President