

**From:** Lower Sonoran RMP  
**Subject:** FW: Comments on Management Actions and Allowable Uses for Gunsight Wash RMZ

**From:** [REDACTED]  
**Sent:** Tuesday, November 22, 2011 11:45:16 AM  
**To:** BLM\_AZ\_LSFO\_SDNM\_RMP  
**Cc:** Ragsdale, William J; Ev & Joan Huddleston  
**Subject:** Comments on Management Actions and Allowable Uses for Gunsight Wash RMZ Auto forwarded by a Rule

To Whom It May Concern,

This 2011-2012 winter season will be our 4th winter as camp hosts for Gunsight Wash. I believe that this experience gives us a unique perspective on the needs of the public using the camp in relation to the proposed Plan.

The features that bring campers to the Gunsight Wash camp are many.

Probably the most important feature is the free access. There are other facilities in the area. Campsites with no utilities at the Organ Pipe National Monument are \$12 a night. Behavior there is highly regulated as is necessary in such a pristine habitat. Campsites are very close to each other. Another option for dry camping is Coyote Howls East an RV Park in Why, AZ. A night there will set you back \$8 but sites can be rented annually for \$500 and a camper may stay in one spot for the whole season. You get a spot about the size of a suburban yard. Regulations exist to preserve the enjoyment for everyone.

Whereas, at Gunsight Wash there is so much space that if you don't like what your neighbor is doing, you can move as far away as you like. Enforcement of an actual rule is very rare. An information sheet is given to campers. Gunsight Wash being free for two weeks is a unique feature in a community that struggles fiercely for every tourist dollar.

The next important feature bringing people to Gunsight Wash is the vegetation. Mature ironwood, palo verde, and mesquite trees along with various types of bushes, are nurtured by the moisture in the wash. The wash demonstrates that it provides year-round underground water by supporting healthy desert willow trees. This relative lushness brings many wildlife watchers. Gunsight wash has less wind and dust compared to the LTVAs. Since the Organ Pipe National Monument is cattle-free and strictly controlled, there is more wildlife and vegetation than at Gunsight Wash. At Coyote Howls the vegetation is much sparser- more like the LTVAs near Yuma, AZ. Allowing people to stay for long periods at Coyote Howls has lead to deforestation and homesteading. So, the natural environment is very important to the people who use the Gunsight Wash camp.

Other attractive features to campers are: proximity to the Why Senior Center and its activities, a well-placed overnight spot for travelers to and from Mexico, the quiet, the privacy, access to ATV trails, and an unmatched sense of liberty.

And these features draw campers to specific sites. Even though they are described as dispersed and undesignated sites, many campers want to return to the same particular spot year-after-year. The position of a tree, the nearness to the wash or the road, or just because they have great memories of a spot gives them a sense of ownership. They want to camp in "their" site. Unfortunately, despite the vast choices of good sites there are about half a dozen spots in the camp that are continually occupied: the Favorites. Whether we have a busy season or a slow one they are always filled all season long. This leads to hard feelings among people who arrive to find that their site is unavailable. The favorite sites get dustier and less vegetated as a result of their popularity. Increasing the amount of time one group could stay in one particular site would only exacerbate this problem.

Fewer people would get a chance to stay in the location they prefer.

Early, longer-term campers would prohibit the more numerous short-term campers from the experience they come to Gunsight Wash for. It just wouldn't be as fair as the current system.

A workable alternative is to allow campers to stay at the camp for as long as they want, but insist that they change sites every two weeks.

We can use our current system of two week registrations to manage it.

It keeps the current level of fairness for everyone, but also allows people to spend more time and money in the area. There are already low-priced, season-long, stay-in-one-place alternatives in the community. The economy needs neither another managed campground nor an LTVA. These are already existing options. The community will appreciate having a unique camping opportunity that will bring other, different campers into the area.

People being people, we will need to designate the distance a group will need to remove from the original site. A large distance, say 100 meters (most of our campers are Canadian) will encourage a broader, less intensive use of the entire camp. There really are very nice sites that seldom get used. Maybe new favorites will be found.

We also currently need a designated distance between units. Because many other campgrounds with undesignated sites have a lower level of shrubbery than Gunsight Wash, people can park as close to each other as they like. A minimum rig distance (10 meters) would serve two purposes. It would prevent newcomers from parking on top of campers until their two weeks is up thereby intimidating them into leaving (we've seen it happen). It would also protect the vegetation around a site from being chipped away at by trying to get too many rigs into a spot (also a first-hand experience).

Specifically, in Chapter 2, RR-1.2.18 through RR-1.2.27 the reference to "provided the campground does not remain at 100 percent capacity for three (3) consecutive nights." In a campground without designated sites this is an unenforceable, unknowable criterion. Even more so if there is no stated distance between rigs required.

In general, there are a few rule changes that would enhance the experience of the public and preserve the vegetation. Make the Gunsight Wash, the actual wash itself, off-limits to ATVs. The sites next to the wash take a terrible beating from erosion when riders drive their ATVs into the wash from the adjacent site. These sites tend to be the favorites for everyone and they suffer enough from over-use. Gunsight Wash, the camp area, with its designated roads for ATV use is a natural conduit to a community wide system of designated roads for the area. It is easy for the ATVs to get from here to there.

The "Lands of Many Uses" directive for the BLM affects the health of Gunsight Wash camp very adversely. In the fragile desert environment, any kind of use becomes a force towards erosion and deforestation. We just can't help it. Hence the strict rules at Organ Pipe National Monument. The many uses of Gunsight Wash add up to a deteriorating natural experience for the public use. Ranchers with cattle, campers with RVs, riders with ATVs, and Border Patrol enforcement are too many uses for this type of land to sustain. While it doesn't make sense to cut off the vehicle use of the very people we are protecting it for, in order to preserve the natural experience there are some choices that must be made and some limits to be put on its use. Border Patrol enforcement is a given. The agents cannot control where they need to go in order to do their job. Riders of ATVs have already been limited to designated roads and should be encouraged to ride where they do the least damage. RVers could be limited to designated sites. But a managed campground would ruin the uniqueness of Gunsight Wash. Site designation can be done inexpensively and with very low impact. In fact we are already using vertical mulching techniques to improve the soil and discourage driving in places around the campground. The users who do the most wide spread damage are the cows. They go where no RVer or ATV rider could go. They eat all the new growth on vegetation and do not allow the land to renew itself. Not only do they work against the natural experience at the camp they leave unsightly droppings and bring very unpleasant flies. Simultaneous ranching and recreational use cannot be sustained at Gunsight Wash. Having the public removed for the benefit of a rancher is a very undemocratic solution; depriving the many for the benefit of a very few. The expiration without renewal of the lease for ranching on the Gunsight Wash allotment would go a long way to mitigating the effects caused by recreational users. The land would get a chance to heal.

In summary, our comments on the Plan are thus:

- allow longer term stays in the campground but keep the move to a new site every two weeks rule.
- designate a distance from each site and each rig to manage the longer stays.
- prohibit ATVs in the wash.
- designate sites using vertical mulching techniques only.
- get rid of the cows.

Thank you for your attention to this matter. Sincerely,

[Redacted signature]

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