

# Business Plan for the San Juan River (Amended 2014)



**United States Department of the Interior  
Bureau of Land Management, Utah  
Canyon Country District  
Monticello Field Office  
September 2013  
July 2014 (Amended)**



# Amended Business Plan for the San Juan River

## RECOMMENDATIONS, REVIEWS, AND APPROVALS

Recommended by:

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Recreation Assistant

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Date

Reviewed by:

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Outdoor Recreation Planner

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Date

Approved By:

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Field Manager

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Date

This business plan was prepared pursuant to the Federal Lands Recreation Enhancement Act (Public Law 108-447) and BLM recreation fee program policy. It establishes future management goals and priorities for the San Juan River recreation fee program in the Monticello Field Office.



## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Monticello Field Office

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In Reply Refer to:  
2932 (UTY-020)

Dear Reader,

I would like to present for your review and comment the *Amended Business Plan for the San Juan River*. The Bureau of Land Management, Monticello Field Office (BLM) manages river use permitting on the San Juan River between Montezuma Creek, Utah and Clay Hills Crossing. The scenic float trip annually provides approximately 11,500 visitors with outstanding recreational opportunities on their public lands. Of these visitors, approximately 3,000 are passengers on commercial river trips, and 8,500 are private boaters.

The *Draft Business Plan for the San Juan River* was originally presented for public comment and review from December 20, 2012 to January 25, 2013. The plan was then presented to the Utah Recreation Resource Advisory Council for formal review and the 15-member panel approved the plan and the proposed fee increases on February 22, 2013. After incorporating public comments, the final Business Plan for the San Juan River was signed and approved by the BLM on November 22, 2013. The business plan proposed to move the San Juan River permit program to an online system to improve customer service, but did not describe the proposed change in detail because the BLM was considering several options before moving to an online permit system.

The BLM has determined that Recreation.gov is the best and most feasible option for San Juan River online permitting. The Addendum in Section J of the *Amended Business Plan for the San Juan River* describes the proposed change from a locally operated mail-in permit lottery and call-in reservation system to the Recreation.gov online system. In connection with the move to Recreation.gov, proposed changes to business rules including; fee payment timeline, refund policy, and application/transaction fee collection have been incorporated into the approved *Business Plan for the San Juan River*.

The objective of the *Amended Business Plan for the San Juan River* is to provide you with the opportunity to review the proposed change to move the permitting system to Recreation.gov and give you the opportunity to submit comments on the proposed changes in the Addendum. Please limit comments to the Addendum (Section J) as the rest of the business plan was recently approved after a prior public comment period. Comments may be mailed to BLM, Monticello Field Office, P.O. Box 7, Monticello, UT, 84535 or e-mailed to [BLM\\_UT\\_MT\\_Comments@blm.gov](mailto:BLM_UT_MT_Comments@blm.gov) (please put "Amended San Juan Business Plan" in subject line). Comments are due by September 29, 2014. Thank you for your interest in your public lands.

Sincerely,

Donald K. Hoffheins  
Field Manager

## Table of Contents

Introduction.....	5
Background and Authorities.....	5
A. Introduction to the BLM Monticello Field Office Recreation Fee Program.....	7
B. Description of the San Juan River Program.....	11
C. Proposed Modifications to Recreation Fee Rates and Permit Distribution.....	15
D. Operating Costs .....	18
E. Revenues.....	20
F. Priorities for Future Expenditures.....	21
G. Analysis of Recreation Fee Rates.....	27
H. Impacts from Changing and Not Changing Recreation Fee Rates.....	31
I. Public Outreach.....	35
<b>J. Addendum: Proposal to Move to Recreation.gov.....</b>	<b>37</b>
Appendix A. Public Comment Matrix	
Appendix B. San Juan River Visitation by Month 2007 – 2011	
Appendix C. Sand Island Visitor Survey	
Graph 1: Annual San Juan River Visitation 1992 – 2011.....	25
Graph 2: Navajo Reservoir Pool Elevation 1992 – 2011.....	25
Map 1: Monticello Field Office.....	7
Map 2: San Juan River, Montezuma Creek to Clay Hills.....	10
Table 1: Recreation Visits to the Monticello Field Office.....	8
Table 2: San Juan River Visitation.....	11
Table 3: Facilities Maintained in Support of the San Juan River Program.....	13
Table 4: Existing and Proposed Recreation Fee Rates for the San Juan River .....	15
Table 5: 2011 Permit Demand and Reservation Cancellation Rate Comparison.....	17
Table 6: Costs, Collections, and Fund Balance of San Juan River Fee Account.....	18
Table 7: Fiscal Year 2011 Total Costs and Revenues of San Juan River Program....	19
Table 8: Annual San Juan River Special Recreation Permit Revenues .....	20
Table 9: San Juan River Fee Account Estimates <u>Without</u> Fee Increase .....	26
Table 10: San Juan River Fee Account Estimates <u>With</u> Proposed Fee Increase.....	27
Table 11: San Juan River Program Cost Recovery Estimates.....	28
Table 12: Comparison of River Permit Fees.....	30
Table 13: Estimated Cost of San Juan River Private Trip.....	32
<b>Table 14: Proposed Changes to Permit Process for Move to Recreation.gov.....</b>	<b>38</b>

# Business Plan for the San Juan River

## Introduction

The Bureau of Land Management (BLM) originally began collecting recreational fees for the use of public lands under the authority of the Federal Lands Policy and Management Act of 1976. The Federal Lands Recreation Enhancement Act of 2004 (REA) now provides the BLM with its current authority to collect recreational fees, and allows the agency to collect Special Recreation Permit fees for specialized uses of federal lands and waters. The act authorizes the BLM to locally retain collected recreation fees and outlines how revenues may be used, for such things as facility repair, facility maintenance, facility enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, law enforcement related to public use and recreation, and operating or capital costs directly associated with the Recreation and Visitor Services Program.

BLM guidelines require that each recreation fee program have a business plan which thoroughly discusses fees and explains how fees are consistent with the criteria set forth in REA and other agency directives. Business plans assist management in determining appropriate fee rates, outline the cost of administering fee programs, and identify priorities for future fee program expenditures. The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fee revenues and to provide the public an opportunity to comment on these objectives. The *Draft Business Plan for the San Juan River* was subject to public review, which will be considered prior to making any changes to the river fee program.

The BLM requires Special Recreation Permits for all use of the San Juan River between Montezuma Creek and Clay Hills Crossing. All permit fees are deposited into an account specifically and solely for the management of the San Juan River recreation program. This includes Special Recreation Permit fees required for all recreational use of the San Juan River, as well as additional Special Recreation Permit fees charged to commercial river outfitters. This business plan covers Special Recreation Permit fees and proposes a new non-commercial application fee; additional Special Recreation Permit fee rates for commercial river outfitters are established on a national level and are not addressed in this business plan.

Sand Island Campground fees, which are currently deposited into the Monticello Field Office's San Juan River fee account, will no longer be deposited in the same account and will be placed into a separate campground fee account. Sand Island Campground fees will be addressed in a separate campground business plan and are only discussed in this plan for the purpose of distinguishing between San Juan River and Sand Island Campground revenues and costs.

## Background and Authorities

The authorities and regulations for this business plan are:

- **The Federal Land Policy and Management Act of 1976** (Public Law 94-579), contains BLM's general land use management authority over the public lands, and establishes outdoor recreation as one of the principal uses of those lands. Section 302 (b) of FLPMA authorizes the BLM to manage the use of the public lands through permits.
- **The Federal Lands Recreation Enhancement Act of 2004** (Public Law 108-447), repealed applicable portions of the Land and Water Conservation Fund Act and replaced

BLM's authority to collect recreational fees. This law authorizes BLM to collect recreation fees at sites that meet certain requirements, allows BLM to keep the fee revenues at the local offices where they are collected, and directs how BLM will manage and utilize these revenues. Section 803 contains BLM's authority to issue permits and charge a permit fee for use of the San Juan River. Section 803 (h) authorizes the BLM to require Special Recreation Permits and fees associated with specialized recreation uses of federal lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.

- ***Code of Federal Regulations, Title 43, Part 2930 (43 CFR 2930)***, contains the regulations governing BLM's recreation permitting programs. 43 CFR, Subpart 2932.11(b) contains BLM's authority to issue permits for use of the San Juan River. It states that, "If BLM determines that it is necessary, based on planning decisions, resource concerns, potential user conflicts, or public health and safety, we may require you to obtain a Special Recreation Permit for – (1) Recreational use of special areas." A "special area" is where the BLM determines that the resources require special management and control measures for their protection. Permits for the San Juan River Special Recreation Management Area protect primitive recreation experiences, riparian ecosystems, and cultural and historic resources.
- ***BLM Recreation Permit Administration Handbook (H-2930-1)***, explains how the BLM implements its recreation permit and fee program. Chapter 1, page 27, sections (e) and (f) specifically address Special Recreation Permit fees for Special Areas and application fees for Special Recreation Permits.

This business plan has also been prepared pursuant to all applicable BLM recreation fee program policies and guidance, including:

- BLM Recreation Fee Proposals Step-by-Step Review & Approval Process, March 22, 2007
- BLM Instruction Memorandum 2007-028: *Federal Lands Recreation Enhancement Act – Final Public Participation Policy for Certain Recreation Fee Adjustments and Proposed New Fee Sites/Areas*
- BLM Utah Instruction Memorandum UT 2007-056: *Fee Site Business Plan Development and Business Plan Outline*
- BLM Utah Instruction Memorandum UT 2013-037: *Utah Recreation Fee Program Toolbox*

The BLM strives to manage recreation and visitor services to serve diverse outdoor recreation demands while helping to maintain sustainable setting conditions needed to conserve public lands, so the visitor's desired recreation choices remain available. The BLM's goals for delivering recreation benefits from BLM-administered lands to the American people and their communities are:

- Improve access to appropriate recreation opportunities;
- Ensure a quality experience and enjoyment of natural and cultural resources; and
- Provide for and receive fair value in recreation.

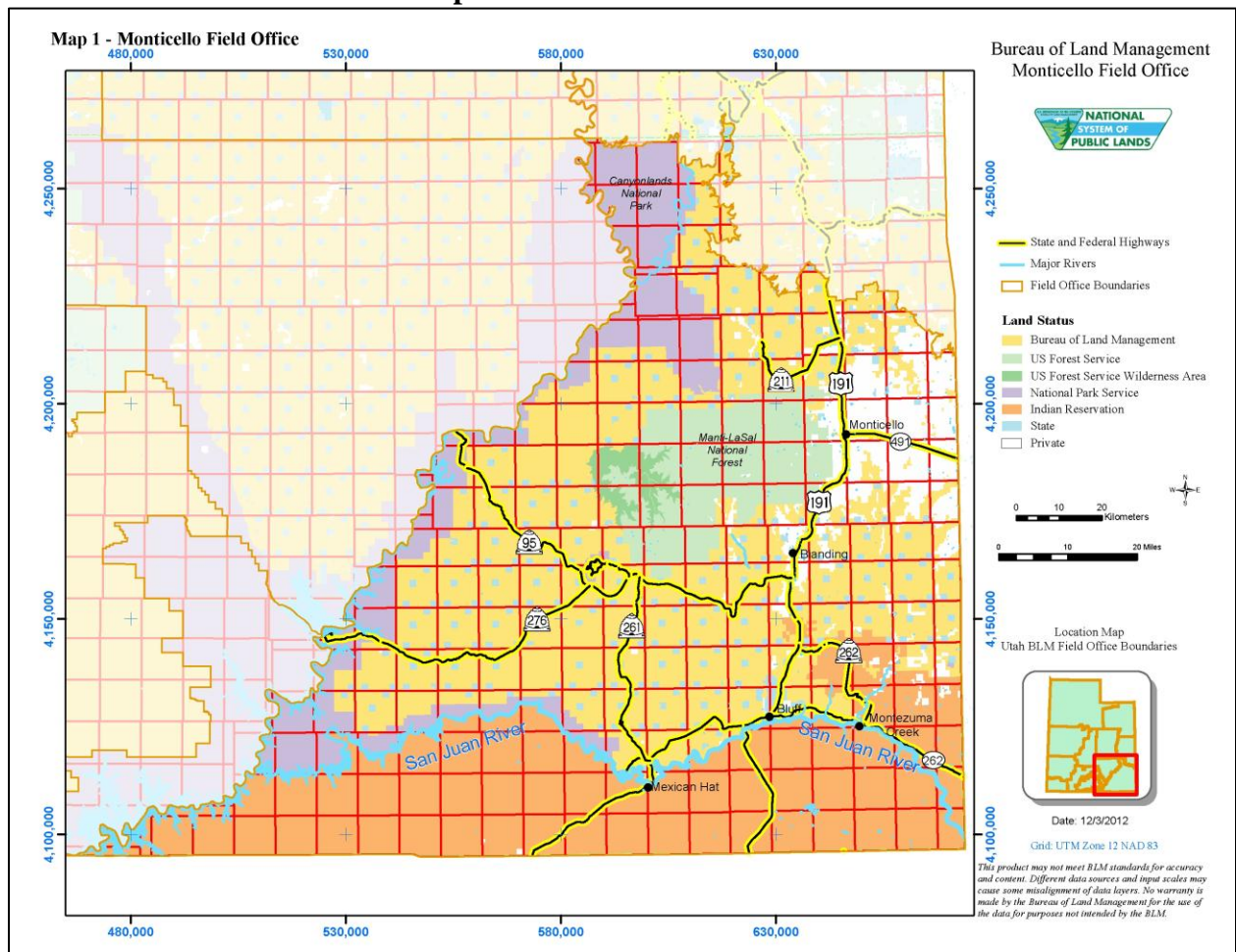
This business plan will assist the Monticello Field Office in meeting these recreation and visitor service goals for San Juan River users. San Juan River float trips are managed through the BLM’s Special Recreation Permit program and river operations are primarily supported through the revenues generated by the permit fees.

**A. Introduction to the BLM Monticello Field Office Recreation Fee Program**

Administrative Unit

The BLM Monticello Field Office is a component of BLM Utah’s Canyon Country District, and is the administrative unit responsible for the San Juan River fee program. The Monticello Field Office manages approximately 1.8 million acres of public lands in San Juan County, Utah and is located in Utah’s 2<sup>nd</sup> Congressional District.

**Map 1: Monticello Field Office**



Monticello Field Office Recreation Program and Visitation

The Monticello Field Office has an extensive recreation program. A spectacular landscape and rich archeological resources provide visitors with an abundance of recreational opportunities. Recreational activities within the Monticello Field Office include camping, backpacking, hiking,

off-highway vehicle (OHV) use, whitewater boating, rock climbing, canyoneering, visiting archaeological sites, and driving scenic byways. Features such as the San Juan River, Grand Gulch and Cedar Mesa, Indian Creek, Newspaper Rock, Dark Canyon, Valley of the Gods, Comb Ridge, the Hole in the Rock Trail, and the White Canyon area attract visitors from all over the world, who recreate both privately and by hiring commercial outfitters.

The Monticello Field Office manages public lands that border Canyonlands National Park, Glen Canyon National Recreation Area, and surround Natural Bridges National Monument, Goosenecks State Park, and the Manti La Sal-National Forest.

Recorded visitation to BLM lands in the Monticello Field Office was approximately 203,000 visits in 2011. Due to the remoteness of many sites and expansiveness of the backcountry within the Monticello Field Office, it is likely that visitation is much higher than what has been recorded.

**Table 1: Recreation Visits to the Monticello Field Office**

<b>Year</b>	<b>Recorded Visits to Monticello Field Office</b>
2007	167,514
2008	159,604
2009	180,777
2010	221,991
2011	202,943

Visitation to the Monticello Field Office has significantly increased over the last five years. In 2011, there were 21% more visits recorded than in 2007. This long-term growth trend is expected to continue and increasing recreation visits are anticipated.

The Special Recreation Permit (SRP) programs provided by the Monticello Field Office include commercial and non-commercial recreation permits for whitewater boating on the San Juan River, and commercial and non-commercial permits for backpacking in the canyons of the Cedar Mesa Special Recreation Management Area (SRMA). The Monticello Field Office collects fees for both of these SRP programs. In addition, SRPs are issued to commercial outfitters operating throughout the Monticello Field Office resource area, who provide a multitude of guided activities including; backpacking, rock climbing, canyoneering, wilderness therapy, heritage tours, horseback riding, and OHV tours. SRPs are also issued for non-commercial organized groups recreating and hosting events within the Monticello Field Office.

The Monticello Field Office currently manages two campgrounds where recreation use fees are charged. Sand Island Campground, three miles west of Bluff, UT, is the major boat launching point for most San Juan River trips. Hamburger Rock Campground is located in the Indian Creek corridor just outside of the Needles District of Canyonlands National Park.

Applicable Plans

Management in the Monticello Field Office is guided by the Monticello Field Office Approved Resource Management Plan (RMP), which was signed November 17, 2008. Specific decisions



were made concerning the San Juan River Special Recreation Management Area (SRMA), including Special Recreation Permits. These are:

REC-17 (pg. 91): Special Recreation Permits (SRPs): SRPs will be issued as a discretionary action as a means to help meet management objectives, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors.

REC-48 (pg. 95): General SRMA Guidelines: All SRMAs will be designated as special areas under the Land and Water Conservation Fund (LWCF) definition. As per the Land and Water Conservation Fund Act and the Federal Lands Recreation Enhancement Act, this could require permits and payment of fees for recreation use.

San Juan River SRMA: Goal and Objectives (page 95): Provide outstanding river related recreational opportunities and visitor experiences while protecting natural and cultural resource values with integrated management between the BLM, NPS, and the Navajo Nation.

Allow for boating and rafting activities regulated through permit issuance.

REC-49 (pg. 95): San Juan River SRMA: Permits will be issued to commercial companies on a five year designated basis. They will also be issued to private users through an annual lottery system.

REC-50 (pg. 95): San Juan River SRMA: River trips on the San Juan River require a special use permit.

REC-60 (pg. 96): Launch Limits: Launch limits allow approximately 40,000 user/days per year.

REC-61 (pg. 96): Launch Limits: Trip size is limited to 25 people total (including crew) for private trips. Commercial group size limits on the San Juan River will remain at 33 people (25 passengers plus 8 guides) per trip.

REC-62 (pg. 96): Commercial/Private Allocations: Commercial use is allowed up to 40% of total use. Two commercial day trips per day (one launch of 25 passengers and one launch of ten passengers) are allowed and are not included in the launch limits.

REC-64 (pg. 96): Visitor Services: Minimal visitor services at Sand Island and Mexican Hat ramp areas will be provided for visitor health and safety and resource protection.



## **B. Description of the San Juan River Program**

### Area Description

The Monticello Field Office administers commercial and private Special Recreation Permits (SRPs) for whitewater boating on the 102 mile allocated river segment of the San Juan River between Montezuma Creek, Utah and the Clay Hills Crossing in coordination with the National Park Service's Glen Canyon National Recreation Area and the Navajo Nation. The BLM San Juan River Special Recreation Management Area is approximately 9,859 acres and stretches intermittently along the north side of the river for approximately 64 river miles between Montezuma Creek, Utah and the boundary of the National Park Service's Glen Canyon National Recreation Area. River flows are mostly dam controlled at Navajo Reservoir in New Mexico. Maintained sites include Sand Island Recreation Area, the Mexican Hat boat ramp, and the Clay Hills boat ramp in Glen Canyon National Recreation Area. The map on page 9 shows the location of the three maintained sites, as well as the Montezuma Creek boat launch area. The map also shows land management status along the river corridor.

### Total Visitation

The Monticello Field Office currently administers 11 commercial San Juan River SRPs and issued 1,184 private river permits in 2011. 11,929 visitors engaged in non-motorized boating on the San Juan River in 2011. 2,742 were passengers on commercially guided trips, while 9,052 were private boaters. The table below shows commercial and private visitation for the last five years:

**Table 2: San Juan River Visitation**

<b>Year</b>	<b>Commercial Trips</b>	<b>Commercial Passengers</b>	<b>Private Trips</b>	<b>Private Visitors</b>	<b>Total Trips</b>	<b>Total Visitors</b>
2007	298	2,947	861	7,157	1,159	10,104
2008	312	3,064	1,001	8,092	1,313	11,156
2009	315	3,140	1,096	8,531	1,411	11,671
2010	258	2,583	1,140	8,746	1,398	11,329
2011	264	2,758	1,184	9,171	1,448	11,929

Both private boaters and commercial passengers pay per person SRP fees to float the San Juan River. The current per person per trip fees are \$6.00 for the Sand Island to Mexican Hat segment, \$12.00 for the Mexican Hat to Clay Hills segment, and \$18.00 for the Sand Island to Clay Hills segment. There is no fee to float from Montezuma Creek to Sand Island. The per person SRP fees for the San Juan River are set locally and have not changed since 2001.

### Private Use

Non-commercial permits for the high-use river season (April through October) are initially distributed through a lottery that occurs the first week of February. Successful applicants receive a launch reservation, which they must confirm and pay for within 30 days of their launch date to obtain a river permit. Each year the Monticello Field Office receives approximately 4,200 non-commercial applications for the permit lottery. There is currently no fee to apply. In 2011, 90% or 3,695 applications were submitted for launches during the peak user demand season of April

15<sup>th</sup> through July 15<sup>th</sup>. Of the applications submitted for April 15<sup>th</sup> through July 15<sup>th</sup>, 12% were successfully drawn. Applications submitted for launch dates outside of April 15<sup>th</sup> through July 15<sup>th</sup>, had a 75% success rate. Unsuccessful applicants, as well as applicants who apply for a permit following the lottery, can then obtain available and cancelled permits through advance phone reservations. In 2011, the majority of private river users (62%) obtained their permit through post-lottery phone reservations and cancellations, rather than the lottery.

The vast majority of private use is regional. In 2011, 86% of private permits were issued to trip leaders from the four corners states (Utah, Colorado, Arizona, and New Mexico). 46% of private permits were issued to trip leaders who reside in Colorado. 25% of private permits were issued to trip leaders from the communities of Durango, CO (15%) and Flagstaff, AZ (10%). Less than 1% were issued to local (San Juan County, UT) or international boaters. The visitor origin of all private river runners is likely more widespread than that of the permitted trip leaders, as many trip leaders bring visiting family and friends from beyond the region.

### Commercial Use

Commercial launches are allocated each year, based on historical use, to 11 San Juan River commercial SRP holders. The RMP allows for up to 40% commercial use on the San Juan River, however, commercial use has only accounted for 27% of use over the last five fiscal years. Currently, all commercial use is allocated and no new commercial SRPs are being issued.

Data for the visitor origin of commercial passengers on the San Juan River is unavailable. However, it is likely that the origin of commercial passengers is much more widespread than that of private users, with more national visitation from beyond the four corners states region and more international visitation.

The San Juan River program receives fee revenues from commercial San Juan River SRP holders (3% of gross revenue), as well as the per person SRP fees charged for both private and commercial use of the San Juan River between Sand Island and Clay Hills. As commercial SRP rates are set by national BLM policy and regulation, only per person SRP fees and a new non-commercial permit application fee are proposed for change.

### Facilities and Services

Revenues from San Juan River fees are used to maintain San Juan River recreation facilities, administer the allocated permit program and permit lottery, provide law enforcement services, and provide ranger staffing and patrols for resource protection and public safety. Table 3 includes facilities and locations that are maintained using San Juan River fees:

**Table 3: Facilities Maintained in Support of the San Juan River Program**

Site Name	Location
<p><b>Sand Island Recreation Area:</b> Includes ranger station, ranger residences, warehouse, toilets, drinking water, boat ramp, trash removal, recycling, informational kiosk, picnic area with shade structures, and parking lot (campground facilities at Sand Island will be addressed in a separate business plan)</p>	<p>River Mile 0 3 miles west of Bluff, UT</p>
<p><b>Mexican Hat Boat Ramp:</b> Includes parking lot, boat ramp, toilets, picnic area with shade structures, trash removal, and recycling.</p>	<p>River Mile 27 Mexican Hat, UT</p>
<p><b>Clay Hills Crossing Boat Ramp (NPS):</b> Includes parking lot, boat ramp, recycling, and toilets (maintained by the BLM or by the Glen Canyon National Recreation Area on a reimbursable basis from the BLM San Juan River fee account)</p>	<p>River Mile 83.5 San Juan County Road 278</p>



*The boat ramp at Sand Island is the site of most visitor contacts and compliance checks (top left). Drinking water is provided for river runners at the Sand Island launch site (top right). A vault toilet can be seen in the background. The BLM proposes to upgrade the toilet from a single to a double vault to better accommodate high use at the site.*



*Picnic tables and shade structures provide a gathering place for boaters and refuge from the sun at the Sand Island (left) and Mexican Hat (right) boat ramps.*



*The solar-powered ranger station at Sand Island (left) is a visitor contact station, and along with the river equipment warehouse (below), serves as the operational base for BLM San Juan River rangers.*



### Partnerships and Volunteer Programs

The BLM San Juan River program is supported by several partners. The National Park Service and the Navajo Nation manage the river in coordination with the BLM. The southern side of the river corridor is Navajo Nation land, and boaters must obtain separate permits to camp and recreate on the southern side of the river. At approximately river mile 45.5, the northern side of the river is within Glen Canyon National Recreation Area.

The Monticello Field Office San Juan River program is heavily dependent on volunteer support. Between April and September, there is ideally one to two volunteer River Ranger Assistants on staff at all times, who support BLM River Rangers. Volunteer staffing is critical to managing the river effectively. In addition, volunteer groups perform organized river clean-up trips, which protect the resource and improve the visitor experience.

### Fees

The Special Recreation Permit fee for the San Juan River was established in 1983. The fee at that time was \$1.50 (per person per trip) for the Sand Island to Mexican Hat segment, \$3.00 for the Mexican Hat to Clay Hills segment, and \$5.00 for the Sand Island to Clay Hills segment. In 2001, the current fee schedule of \$6.00 (per person per trip) for the Sand Island to Mexican Hat segment, \$12.00 for the Mexican Hat to Clay Hills segment, and \$18.00 for the Sand Island to Clay Hills segment was established.

### Authority

The San Juan River permit system was established in accordance with the BLM's authorities in the *Code of Federal Regulations* related to the administration of Special Recreation Permits (see Background and Authorities on page 4). The San Juan River was designated as a Special Recreation Management Area in recognition of intensive recreation use and special recreation values. This designation allows the BLM to establish management prescriptions for visitor use on the San Juan River that protect the quality and safety of the visitor experience, reduce user-related conflicts, and protect the river's unique natural and cultural resources.

### **C. Proposed Modifications to Recreation Fee Rates and Permit Distribution**

The Monticello Field Office proposes to raise San Juan River Special Recreation Permit (SRP) fees, and in addition, begin charging a non-commercial permit application fee. The existing and proposed fee increases are shown in the following table for each San Juan River segment:

**Table 4: Existing and Proposed Recreation Fee Rates for the San Juan River**

<b>Fee Type</b>	<b>Current Fee</b>	<b>Proposed Fee</b>
Non-Commercial Permit Application Fee	\$0	\$6
Montezuma Creek to Sand Island SRP Fee	\$0	\$0
Sand Island to Mexican Hat SRP Fee	\$6	\$10
Mexican Hat to Clay Hills SRP Fee	\$12	\$20
Sand Island to Clay Hills SRP Fee	\$18	\$30

The increase in per person SRP fees would affect approximately 11,500 visitors per year, who would pay an additional \$4.00 to \$12.00 per person (depending on the respective river segment) in San Juan River SRP fees. It would affect 11 commercial river outfitters, who would likely need to raise their rates to adjust for the increased fee. In addition, the proposed non-commercial permit application fee would affect approximately 5,000 private boaters per year, who apply for a San Juan River permit.

The proposed per person SRP fee increase would result in an approximately 66% increase in annual SRP fee revenue. The 66% proposed increase would raise the average annual revenue from San Juan River per person SRP fees for the last five fiscal years by approximately \$86,979, from \$131,787 to \$218,766. The fee was last raised in 2001, when the Consumer Price Index was 177.1; at the end of July 2012, the Consumer Price Index was 229.1, representing an increase of about 29%. A significant portion of the proposed SRP fee increase would offset inflation to program operating costs since 2001.

The Monticello Field Office is also proposing a non-commercial permit application fee of \$6.00 to help cover the costs of administering the river permitting program. The non-refundable application fee would be charged upon submission of an application and would be required of all applicants who participate in the permit lottery or who apply for advance reservations.

There is currently no fee to apply for a private permit. The approximate number of applications received per year is about 5,000. It is anticipated that the number of applications received annually would decrease with the introduction of an application fee. Assuming an estimated 25% decrease in the number of applications received per year, the proposed application fee would generate approximately \$22,500 in additional revenue. This revenue would be used for administrative costs, information services costs, and office overhead associated with processing applications and issuing permits; allowing a greater portion of the per person SRP fee revenue to be used for on-site operations that provide resource protection and visitor safety, as well as, facility upkeep and improvements within the San Juan River resource area.

A significant amount of annual labor and costs are associated with processing applications and processing reservations for applicants who cancel their launches before payment, submit multiple applications for the same group trip, or who submit an application as a backup to other permitted river trips simply because there is no fee. There were 364 reservation cancellations in 2011. With no application fee, the cost recovery for labor and costs associated with these transactions is paid entirely by visitors who actually purchase a permit. A \$6.00 application fee would spread the cost of permitting services, and require all applicants who participate in the permit lottery and reservation system to pay a portion of the costs for these services.

While the purpose and intent of the application fee is to offset the costs of processing applications through both the lottery and reservation systems, an additional beneficial outcome may be increased permitting efficiency by reducing the number of redundant or “place holder” applications and cancellations received. The fee would discourage applicants who, because there is no cost to do so, apply for a San Juan River permit as a backup to other river trips of choice and then cancel their San Juan reservation when they are successful in obtaining another permit. In addition, it would likely discourage the practice of sending multiple applications for a single group, which is against San Juan River permit lottery rules and can lead to multiple bookings for the same group trip. Both practices have a negative impact on other applicants as launch dates are awarded to groups who have no intent of using them.

The BLM is also proposing to begin distributing permits for the San Juan River through a secure online permitting system. The current permit system requires river users to call the river office to reserve cancellations and open dates, and most users opt to call the river office to make payment and reserve campsites, as well. With only a single phone line and staff member, as well as limited hours to receive calls; the phone line is often busy, forcing river users to repeatedly call to complete their transactions. An online permitting system would improve customer service by allowing river users to complete routine permitting transactions on their own time which will reduce river office phone traffic. Reduced phone traffic will allow users who have trip planning questions, require more assistance, or need to complete non-routine permitting transactions to reach the river office more readily.

If permitting continues to be administered on the local level at the BLM Monticello Field Office, the application fee will be charged and used as described above. If the BLM uses an existing online permitting service, such as recreation.gov, the Monticello Field Office will not collect an application fee; however, San Juan River applicants would be subject to any transaction fees charged by the reservation service. The current transaction fee on recreation.gov is \$6.00.



In addition to modifying fees and moving to an online permitting system, the Monticello Field Office is considering shortening the lottery permit distribution season from April 1st through October 31st to April 15<sup>th</sup> through July 15<sup>th</sup>, in an effort to increase permitting efficiency. Due to lower visitor demand and a higher rate of cancellations, the lottery is currently an inefficient and unnecessary distribution method outside of the peak permit demand season of April 15<sup>th</sup> through July 15<sup>th</sup>. Table 5 compares visitor demand and cancellation rates from 2011 for the proposed shortened lottery season with the remainder of the current lottery season:

**Table 5: 2011 Permit Demand and Reservation Cancellation Rate Comparison**

Lottery Statistics	Peak Permit Demand Season Apr 15 <sup>th</sup> – July 15 <sup>th</sup>	Moderate Permit Demand Season April 1 <sup>st</sup> – April 14 <sup>th</sup> July 16 <sup>th</sup> – Oct 31 <sup>st</sup>
% of Lottery Applications	90%	10%
Lottery Success Rate	12%	75%
Cancellation Rate of Successful Lottery Reservations	38%	60%
Cancellation Rebooking Rate	92%	69%

When permit demand is high, the lottery system is an effective tool to fairly distribute launches to the public. A reservation cancellation rate of 38% during the peak permit demand season is acceptable and beneficial because it provides opportunities for more spontaneous San Juan River applicants to pick up available launches closer to the respective launch dates (at least 30 days in advance) through cancellations. This allows recreation users who need to plan well in advance, as well as more spontaneous recreation users to both have an opportunity to obtain a permit. Due to high demand for launches April 15<sup>th</sup> through July 15<sup>th</sup>, these cancellations are typically rebooked by the BLM.

Outside of the peak season, lottery applicants in 2011 had a three out of four chance of getting drawn, and then three out of five of those successful applicants cancelled their reservations. A high cancellation rate and lower user demand make lottery distribution unnecessary and ineffective for launches during this time period. Using a reservation system for launches during this period would reduce reservation cancellations and increase permitting efficiency. The proposed reservation system would allow applicants to apply for a reservation on a first come-first served basis as early as three months in advance of a launch date for launches outside of the April 15<sup>th</sup> through July 15<sup>th</sup> lottery season. All launch cancellations would continue to be immediately made available for other boaters.

The BLM will not change the current permit lottery season until an online permitting system is in place for the San Juan River. After implementation, the BLM will analyze how the online permitting system impacts application, cancellation, and rebooking rates and then consider whether the proposed shortened lottery season would be of benefit to river users and the river program.

## D. Operating Costs

The Monticello Field Office maintains an extensive infrastructure that supports private and commercial San Juan River recreation. The largest expense, aside from labor costs, is the operation of the Sand Island Recreation Area. Operations at Sand Island include solar powered residences for river rangers and volunteers, a ranger station and bookstore, a drinking water system, two vehicles, a boat ramp, toilets, a warehouse with all the boating equipment required for river patrols and rescues, a parking lot, and trash removal. Other San Juan River infrastructure maintained by the Monticello Field Office includes the Mexican Hat and Clay Hills boat ramps detailed in Table 3, along with their associated parking lots, toilets, shaded picnic areas, trash removal, and recycling. Trash removal and cleaning services are provided by contractors through annual contracts. In addition, the Monticello Field Office pays the National Park Service’s Southeastern Utah Group to pump the vault toilets at Sand Island and Mexican Hat through an interagency agreement.. The toilet at Clay Hills is pumped by Glen Canyon National Recreation Area on a reimbursable basis with revenues from the BLM San Juan River permitting program.

Annual operating costs for the San Juan River program include expenditures for permit administration, on-site permit and resource monitoring, law enforcement services, facility maintenance and cleaning, vault toilet pumping, parking lot maintenance, and trash disposal. Six permanent employees and one seasonal employee provide services to the San Juan River program: four river rangers provide on-site patrols, compliance checks, maintenance and cleaning, interpretation, resource protection, and safety services at the launch sites and throughout the river corridor; one of those river rangers also serves part-time as the only maintenance staff for the entire Monticello Field Office resource area; one recreation employee performs commercial and private permit administration; and two law enforcement officers provide law enforcement and safety services. The labor expended by each employee is pro-rated among the various fee accounts in which he or she works.

Table 6 identifies the annual collections and expenditures in the Monticello Field Office’s San Juan River fee account, including the net gain/loss and fund balance for the last five fiscal years. It does not include additional program costs that are paid for with annual appropriated funding. The fund balance is the amount of revenue the San Juan River fee account carries over at the end of the fiscal year. The fund balance should be sufficient enough to cover at least a year’s worth of program costs:

**Table 6: Costs, Collections, and Fund Balance of San Juan River Fee Account:**

<b>Federal Fiscal Year</b>	<b>Labor Costs</b>	<b>Operations Costs</b>	<b>Collections</b>	<b>Net Gain/Loss</b>	<b>Fund Balance</b>
2011	\$166,253	\$38,055	\$192,808	-\$11,500	\$164,045
2010	\$179,585	\$18,789	\$183,206	-\$15,168	\$175,545
2009	\$165,403	\$13,089	\$189,214	\$10,722	\$190,713
2008	\$124,720	\$18,907	\$175,125	\$31,498	\$179,991
2007	\$176,216	\$20,960	\$152,787	-\$44,389	\$148,493
<b>5-Year Average</b>	<b>\$162,435</b>	<b>\$21,960</b>	<b>\$178,628</b>	<b>-\$5,767</b>	<b>\$171,757</b>

Table 6 is a ledger of the San Juan River fee account and does not show the actual costs and collections associated with the San Juan River program. In order to determine the actual annual costs and collections of the program, Sand Island Campground collections and estimated costs need to be subtracted from the totals in Table 6. In addition, annual appropriated funding, which covers a large portion (29% in 2011) of program expenditures and subsidizes the San Juan River program, needs to be added to the total annual costs (see Table 7).

In 2011, Sand Island Campground fees produced \$20,587 in revenue in the San Juan River fee account. The remaining \$172,221 in revenue was generated from San Juan River Special Recreation Permit fees. It is estimated that 90% of annual staff labor costs in the fee account was for work performed in support of the San Juan River program, which brings the amount of program labor costs paid with San Juan River fee revenue down to \$149,628 in 2011. Only \$542 of San Juan River fee account revenue was spent on campground operations in 2011, bringing the operations costs for the San Juan River program in 2011 down to \$37,513.

The cost of operations was notably higher in 2011 than the prior four fiscal years. A majority of the additional costs (\$12,000) funded a three month intern position in the Monticello Field Office, to assist with the preliminary stages of preparing a Draft San Juan River Management Plan. San Juan River Special Recreation Permit revenues will continue to be used, as needed, to fund planning and research efforts until the completion of a San Juan River Management Plan.

Additional costs to the government of administering the San Juan River program include managerial and administrative support, work by recreation planners and maintenance staff, hosting volunteer staff, and office overhead (including information services to the public). These costs are generally paid for through annual appropriated funds from the Recreation Resources Management account or the Annual Maintenance account. In 2011, approximately \$76,567 was allocated to the San Juan River program from appropriated funds. This means that the actual costs of operating the San Juan River program in 2011 totaled approximately \$263,708 and 29% of the San Juan River program costs were paid with appropriated funds.

Table 7 shows a breakdown of the total cost of operating the San Juan River program with the inclusion of expenses paid with annual appropriated funding. In addition, it shows the actual collections generated by San Juan River Special Recreation Permit fees in fiscal year 2011 (excludes Sand Island Campground collections).

**Table 7: Fiscal Year 2011 Total Costs and Revenues of San Juan River Program**

Cost Type	Fiscal Year 2011 Costs			Total Costs	Total Collections	Difference
	San Juan River Fee Account	Appropriated Funds				
		Recreation Resources Management	Annual Maintenance			
Labor	\$149,628	\$47,672	\$4,303	\$201,603		
Operations	\$37,513	\$12,695	\$11,897	\$62,105		
<b>Total</b>	<b>\$187,141</b>	<b>\$60,367</b>	<b>\$16,200</b>	<b>\$263,708</b>	<b>\$172,221</b>	<b>-\$91,487</b>

The 2011 carry-over fund balance in Table 6 of \$164,045 and the total Special Recreation Permit collections of \$172,221 (Table 7) both fall well short of the program’s total annual operating costs of \$263,708. The San Juan River program should currently be producing enough revenue to carry-over a fund balance of at least \$275,000 to ensure program stability and continuity. The program is currently dependent on a large sum of appropriated funding (\$76,567 in 2011) to meet costs at current operation levels.

**E. Revenues**

San Juan River revenues are currently generated from three sources; per person Special Recreation Permit (SRP) fees charged for commercial and non-commercial San Juan River boaters, additional commercial SRP fees charged to commercial river outfitters and established by national policy (3% of gross revenues), and camping fees collected at the Sand Island Recreation Area. The San Juan River SRP fee is charged for use of the San Juan River between March 1<sup>st</sup> and October 31<sup>st</sup>. Private boaters pay this fee upon confirming a San Juan River launch reservation. Commercial permittees are billed for the per person SRP fees for their passengers, plus 3% of their annual gross receipts after submitting an annual post-use report in November. In accordance with their permit stipulations, commercial permittees also pay penalty fees for failure to cancel or use launch reservations.

Recreation use fees for camping at Sand Island Campground are currently deposited in the same account as San Juan River SRP fees. This is due to some overlap in maintained facilities, staffing, and recreation users at Sand Island Recreation Area. However, going forward, the Monticello Field Office plans to split Sand Island Campground fee revenues out from San Juan River permit revenues to ensure that user fees are fair and used proportionately to support each respective recreation program and activity. Sand Island camping fee revenues will be deposited into a separate campground account established exclusively for campground operations, labor, maintenance, and improvements; while San Juan River SRP revenues will remain in the San Juan River fee account and be used to exclusively support the San Juan River program and associated facilities at Sand Island Recreation Area. Table 8 shows a breakdown of annual San Juan River SRP fee revenues over the last five fiscal years:

**Table 8: Annual San Juan River Special Recreation Permit Revenues**

<b>Federal Fiscal Year</b>	<b>Per Person Special Recreation Permit Fees</b> (private and commercial)	<b>Commercial Special Recreation Permit Fees</b> (3% of gross and penalties)	<b>Total Revenues</b> (Excluding Sand Island Campground)
2011	\$141,233	\$30,988	\$172,221
2010	\$133,203	\$32,136	\$165,339
2009	\$140,961	\$33,440	\$174,401
2008	\$129,559	\$29,737	\$159,296
2007	\$113,981	\$23,569	\$137,550
<b>Avg.</b>	<b>\$131,787</b>	<b>\$29,974</b>	<b>\$161,761</b>

At the current fee rate, projected annual San Juan River SRP revenues are expected to remain relatively the same as the last five fiscal years. However, demand for permits is driven by river flow, with drought and low water years having a negative impact on annual visitation and fee revenues. This unpredictable variable makes it difficult to accurately project future annual revenues.

The average annual revenue from San Juan River SRPs over the last five fiscal years was \$161,761. Launch limits established in the 2008 Monticello RMP limit the amount of annual use, leaving little room for significant future growth in annual visitation. Over the last 20 years, there has not been a steady growth trend in private or commercial visitation on the San Juan River. Visitation has steadily increased since 2002; however, visitation during the 1990s was at the same approximate level as the last five fiscal years. Within the last 20 years, annual visitation on the San Juan River has varied from year to year, peaking as high as 13,000 users and dipping as low as 7,500 users (see Graph 1 on page 24).

With annual visitation unexpected to grow, the proposed per person SRP fee increase (see Table 4) would result in a 66% increase in annual San Juan River SRP fee revenues. In addition, the proposed non-commercial permit application fee would provide approximately \$22,500 in additional revenues, anticipating a 25% decrease in the number of permit applications received with the implementation of an application fee. By increasing the average annual per person SRP fee revenue of the last five fiscal years (\$131,787) by 66% to \$218,766, adding an estimated \$22,500 in additional revenue from the non-commercial application fee, and adding the average annual revenue of additional commercial SRP fees over the last five fiscal years of \$29,974; the projected average annual fee revenue for the San Juan River program would be \$271,240. The proposed fee change would result in an estimated \$109,479 (68%) increase in annual San Juan River program revenues from the five year average of \$161,761.

## **F. Priorities for Future Expenditures**

The Monticello Field Office's priorities for future expenditures for the San Juan River program are as follows:

- The continuation of on-going program services
- Comprehensive interagency river management planning
- Program improvements that benefit visitors and improve BLM operations
- Maintaining the program fund account balance
- Reducing program dependence on annual appropriated funding

### Future Expenditures for On-going Program Services

Priorities for future expenditures for the San Juan River program include all aspects of maintaining current levels of service for river users. This includes maintaining a standard of visitor contact and customer service (including interpretive and information services) that promotes visitor health and safety, as well as protects the San Juan River resource and the quality of the recreation experience. Services include permit processing in an allocated permit lottery system; on-site river patrols and compliance checks for natural resource protection and visitor safety; law enforcement; regular maintenance of San Juan River facilities including a drinking water system, ranger station, appropriately equipped ranger warehouse, toilets, trash facilities,

boat ramps, day use and picnicking structures, and parking lots. Additional revenues from the proposed fees would cover the rising costs of operating the San Juan River program, and offset the 29% increase in the Consumer Price Index since 2001, when the current Special Recreation Permit fees were established.

In accordance with the 2008 *Approved BLM Monticello Field Office Resource Management Plan*, minimal visitor services at the Sand Island and Mexican Hat ramp areas will be provided. Routine annual maintenance expenditures and occasional significant infrastructure upkeep and facility improvement expenses are planned at those sites.

#### Future Expenditures for Program Improvements

To the degree available and consistent with maintaining an adequate fund balance and reducing the San Juan River program's reliance on annual appropriated funding, additional fee revenues would be used toward improving visitor services and maintaining the quality of the recreation experience. Planned visitor service improvements include:

- Development of an interagency river management plan to meet the goals and management objectives of the San Juan River SRMA. This may include the temporary hiring of staff dedicated to writing and completing the plan.
- The increased use of information technology tools to enhance and simplify the permitting process and commercial launch reservation system as needed. Expenditures include software purchase, technology upgrades, and information security measures.
- Funding a full-time maintenance position for the Monticello Field Office (San Juan River fee revenue would be used to pay the portion of labor costs associated with maintaining San Juan River facilities).
- Installing a double vault toilet at Sand Island to better accommodate high use at the site.
- Funding an additional seasonal ranger position, resource specialist, or youth intern position at to support BLM ranger staff in meeting program objectives such as on-site river operations, cultural resource protection, and river management plan development.

Currently, a river ranger also works part time as the only maintenance staff for the entire Monticello Field Office. The Monticello Field Office plans to address this staffing shortfall and field area-wide maintenance back log by hiring a full-time maintenance position to maintain the numerous and widespread facilities throughout the 1.8 million-acre field office. The annual amount of San Juan River fee revenue that would be used to fund a portion of the maintenance position and the cost of a maintenance vehicle is estimated to be approximately \$17,000. The position would eliminate the need for an annual facility cleaning contract, which costs the Monticello Field Office approximately \$4,000 for San Juan River facilities. With the contract savings, the maintenance position would cost the San Juan River program an additional \$13,000 annually.

There is currently only a single vault toilet at the Sand Island boat launch. Due to the number of groups that launch from Sand Island, the single vault is often not enough to accommodate visitors and long lines form to use the facilities. The Monticello Field Office plans to install a double vault toilet at the Sand Island boat launch as soon as the fund balance in the San Juan River fee account has recovered enough to securely cover the river program's basic annual operating costs. With the proposed fees and additional costs of program improvements, this is

expected to occur in 2016. The estimated cost of installing a double vault toilet is approximately \$20,000.

River rangers must cover a large geographic area in the performance of their various duties. The Monticello Field Office has four San Juan river rangers on staff (working staggered shifts), who patrol 84 miles of river, complete daily pre-trip compliance checks at two boat launches, staff the ranger station and monitor the campground at Sand Island, as well as perform regular vehicle and equipment shuttles between three boat launches. Currently, the river program relies heavily on volunteer staffing to support river rangers with operations and visitor services. The river program should ideally have one to two volunteers on staff from April through September. However, volunteer recruitment and staffing is inconsistent during the season, leaving rangers short-handed at times. In addition, volunteers can typically only make short term commitments of about four to six weeks. This means by the time they've been fully trained by a ranger to perform their duties, their term of service is approaching its end. The Monticello Field Office proposes to annually spend an additional \$14,000 to \$24,000 of San Juan River fee revenues to fund an annual six month youth internship position (\$14,000) or seasonal river ranger position (\$24,000), which (along with volunteer staff) would provide rangers with consistent support during the river season.

Rangers and river runners would benefit from an intern or additional seasonal river ranger who would cover staffing shortfalls, and because of a longer term commitment and consistent presence, will be more knowledgeable about the river, its resources, and use regulations when making visitor contacts. It will also provide river staff with the ability to perform necessary river program projects in addition to their basic daily duties. Projects include the development of interpretive materials, as well as the monitoring of recreation impacts to natural and cultural resources, campsite inventorying, and assisting with carrying capacity studies, which will inform river management decisions and the development of a river management plan.

In summary, the total cost of planned improvements would amount to \$27,000 to \$37,000 in additional annual expenses for the San Juan River program. The double vault toilet is a one-time expense, estimated to occur in 2016 and cost approximately \$20,000. Expenditures for software and technology upgrades to improve the permitting process are considered minor and infrequent and are not included in the total. However, these minor upgrades are unaffordable with current river program operating costs and revenues.

#### Maintaining the Fund Account Balance and Reducing Annual Appropriated Funding

It is critical to maintain a positive fund balance in the San Juan River fee account so that the BLM can provide required services and seamless permit administration, quickly address threats to public health and safety, and allocate some revenue for future investments in San Juan River facilities and services. With a fund account balance of \$164,045 and costs totaling \$263,708 in 2011, the San Juan River program is heavily dependent on annual appropriated funding and sufficient river flow levels to sustain the program at its' current level of service.

In normal budget years, regular non-fee program appropriated funds are not available for seasonal employee labor, on-going purchasing, or project work until more than half of the fiscal year has elapsed. A positive fund balance, or working capital fund, is necessary for the

recreation program to provide program services to San Juan River users throughout the year. The fund balance should also be available to cover labor costs of those employees involved in the San Juan River program should appropriated monies be reduced or if annual San Juan River fee revenues are temporarily reduced due to drought or low water years. At current expenditure levels, the Monticello Field Office has determined that a minimum balance of approximately \$275,000 should currently be maintained in the San Juan River fee account to ensure program continuity. The fund balance of \$164,045 at the end of fiscal year 2011 was \$110,955 short of this balance.

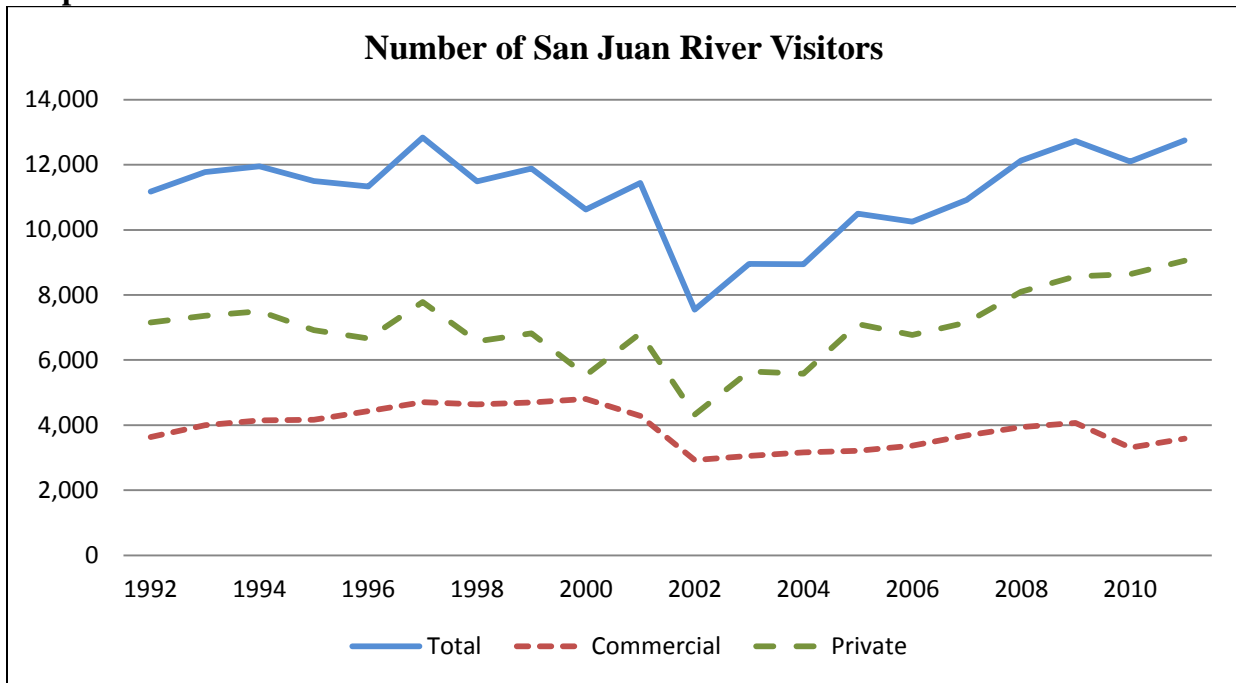
The proposed fee increase would restore the San Juan River program's carry-over fund balance to a level that would ensure program stability and continuity over the long term, while reducing its dependence on annual appropriated funds to cover program expenses. With uncertain economic and political realities, the current level of appropriated funding can't be anticipated year after year to support the program and San Juan permit fees should cover more than 71% of the program's annual expenses. With the current low fund balance, if appropriated funds were significantly cut the San Juan River program would immediately be unable to operate at its current level of service.

The annual appropriated funds that are saved as a result of San Juan River fee revenues covering more of the program's costs can be utilized by the Monticello Field Office to support other recreation program needs and maintenance backlogs throughout the field office that do not benefit from self-supporting program fees.

In addition, the proposed increase will give the San Juan River program the ability to withstand the negative financial impacts of drought and low water years. Over the last five fiscal years, the San Juan River has had relatively good river flow levels and the Navajo Reservoir pool level has been relatively high, which has resulted in the highest rate of visitation since the 1990s. However, desirable river flows and high visitation are not a constant. River use decreased dramatically in 2002 due to low water levels and did not fully recover until 2007. A comparison of the following visitor use graph and Navajo Reservoir pool elevation graph shows the relationship between water levels and visitation.

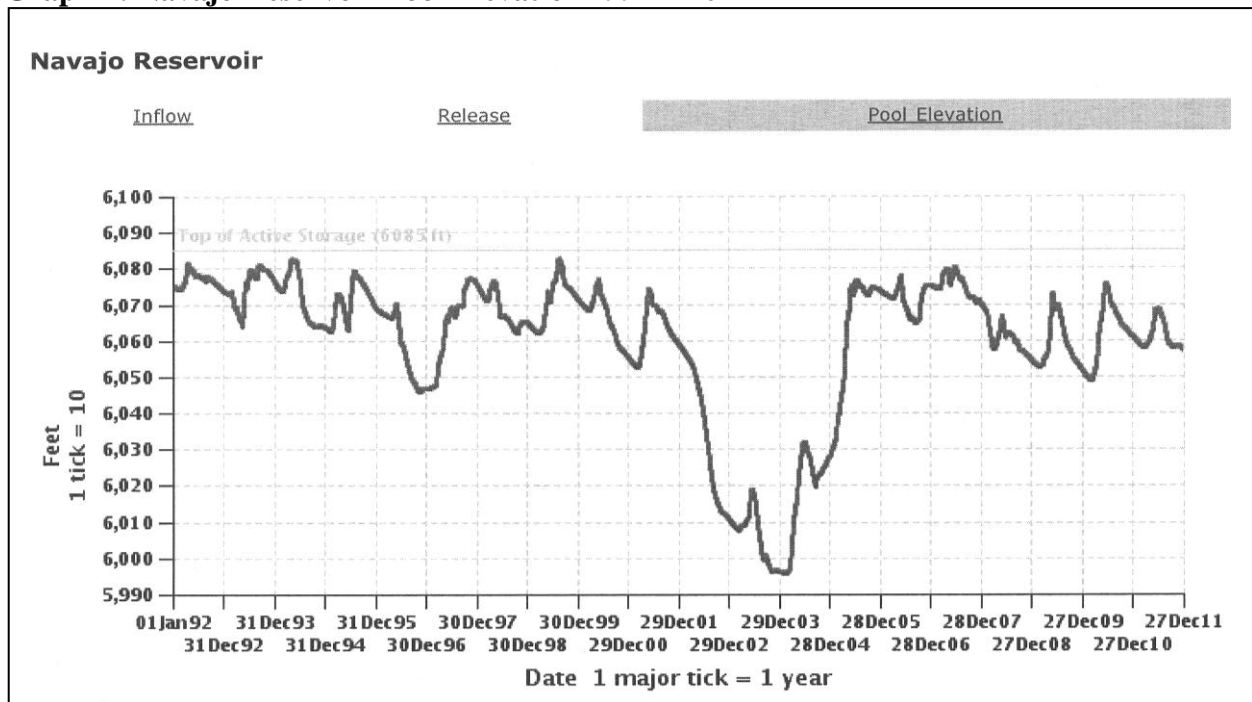


**Graph 1: Annual San Juan River Visitation 1992 – 2011**



*Graph and data from annual use statistics maintained by the BLM Monticello Field Office.*

**Graph 2: Navajo Reservoir Pool Elevation 1992 – 2011**



*Graph and data from the Bureau of Reclamation, Upper Colorado Region Historic Data Webpage (October 2012): <http://www.usbr.gov/uc/crsp/GetSiteInfo>*

Table 9 and Table 10 show the projected annual operating costs, revenues, and carry-over fund balance of the San Juan River fee account for the next five fiscal years for two different scenarios; without the proposed fee increase and with the proposed fee increase. Both tables use the average revenues and costs of the last five fiscal years (2007-2011) and assume a 2% annual increase in labor and operations costs, as well as a 2% increase in the revenue generated from commercial receipts (commercial receipts are expected to rise with inflation as outfitters adjust their prices accordingly).

Table 9 estimates annual revenue and costs if the current fee rate is not changed and expenditures only include the continuation of current program operations and routine annual maintenance. It excludes any significant infrastructure improvements or any of the proposed service improvements. Table 9 assumes that San Juan River fee revenue will continue to only cover 71% of the program's total annual costs.

**Table 9: San Juan River Fee Account Estimates Without Fee Increase**

<b><u>Without</u> Fee Increase and Program Improvements</b>					
<b>Category</b>	<b>Fiscal Year</b>				
	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Estimated Revenue without Fee Increase	\$163,000	\$163,600	\$164,200	\$164,900	\$165,500
Estimated Labor Costs	\$206,200	\$210,300	\$214,500	\$218,800	\$223,200
Estimated Operations Costs	\$48,000	\$49,000	\$49,900	\$50,900	\$51,900
Total Annual Expenditures	\$254,200	\$259,300	\$264,400	\$269,700	\$275,100
% of Program Costs Paid With Fee Revenue	71%	71%	71%	71%	71%
Amount of Program Costs Paid With Fee Revenue	\$180,500	\$184,100	\$187,700	\$191,500	\$195,300
Account Gain/Loss	<b>-\$17,500</b>	<b>-\$20,500</b>	<b>-\$23,500</b>	<b>-\$26,600</b>	<b>-\$29,800</b>
<b>Fund Balance <u>without</u> Fee Increase</b>	<b>\$132,000</b>	<b>\$111,500</b>	<b>\$88,000</b>	<b>\$61,400</b>	<b>\$31,600</b>

The projections in Table 9 illustrate that at current fee levels the San Juan River program is unsustainable and demonstrates how rapidly the carry-over fund balance would be depleted. Despite record high revenues, annual costs in the San Juan River fee account currently exceed fee revenues, as well as the account balance.

Table 10 estimates the annual revenue and costs with the proposed fee increase and proposed program improvements. The table estimates the implementation date of the proposed Special Recreation Permit fee and the non-commercial application fee in 2014. It estimates the cost of funding the proposed maintenance position starting in 2014. All other program improvements, including installation of a double vault toilet at Sand Island, are estimated to occur in 2016 after

the program fund balance accumulates to a sufficient level to ensure program continuity. The table uses the cost of \$14,000 for an annual six month youth intern position, rather than the \$24,000 cost for an additional seasonal river ranger.

**Table 10: San Juan River Fee Account Estimates With Proposed Fee Increase**

<b>With Fee Increase and Program Improvements</b>					
<b>Category</b>	<b>Fiscal Year</b>				
	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Estimated Revenue with Fee Increase and Improvements	\$163,000	\$273,000	\$273,700	\$274,400	\$275,000
Estimated Labor Costs	\$206,200	\$221,300	\$225,700	\$244,200	\$249,100
Estimated Operations Costs	\$48,000	\$51,000	\$52,000	\$73,000	\$54,100
Total Annual Expenditures	\$254,200	\$272,300	\$277,700	\$317,200	\$303,200
% of Program Costs Paid With Fee Revenue	71%	71%	75%	85%	90%
Amount of Program Costs Paid With Fee Revenue	\$180,500	\$193,300	\$208,300	\$269,600	\$272,900
Account Gain/Loss	<b>-\$17,500</b>	\$79,700	\$65,000	\$4,800	\$2,100
<b>Fund Balance <u>with</u> Fee Increase and Program Improvements</b>	<b>\$132,000</b>	<b>\$211,700</b>	<b>\$276,700</b>	<b>\$281,500</b>	<b>\$283,600</b>

With the proposed fee rate, the projections in Table 10 show that the carry-over fund balance would meet the minimum level to ensure program continuity by the close of 2015. The table demonstrates that once the San Juan River program fund balance reaches a sufficient level, the amount of program costs paid for with San Juan River fee revenue will be increased, reducing the program's reliance on annual appropriated funding.

In summary, the proposed fee rate would provide the San Juan River program with long term sustainability and continuity of operations. The program would have the ability to fund improvements when necessary, as well as afford costly unplanned and emergency expenses. In addition, the fund balance would be ample enough to ensure continuity of operations through a temporary loss of revenue in drought and low water years, and will decrease the amount of annual appropriated funding necessary to support the program.

### **G. Analysis of Recreation Fee Rates**

San Juan River Special Recreation Permit (SRP) fees have been at their current rates since 2001. Since that time, the costs of operating the river recreation program have climbed substantially. Increases in costs have come in every category, including labor, fuel, vehicles, supplies, and maintenance. This section uses both the Cost Recovery fee calculation method; as well as the Fair Market Value fee calculation method, which compares the fees charged by other offices and/or agencies for allocated river use with similar facilities and services.

Cost Recovery Fee Calculation Method

Fee rates are based on the concept that revenues should cover a program’s operating costs where direct benefits are provided to users. Table 7 (pg. 19) compared the operating costs and fee revenues for the San Juan River program. As is typically the case, appropriated recreation management and operations funds paid for a significant portion (29% or \$76,567) of San Juan River program labor and operations costs in 2011. At current fee levels, the program could not meet annual expenses without that level of appropriated funding. In 2011, permit revenues were \$91,487 less than the San Juan River permitting program’s total expenditures.

Table 11 shows the percentage of annual expenditures that would be recovered by annual revenue produced from the proposed SRP and application fees, as well as the per person SRP fee rate that would be necessary for 100% cost recovery. The estimated annual operating expenditures are those necessary to continue existing program services, maintain facilities, and accomplish the program improvements detailed in Section F of this plan. The table assumes that the proposed fees will be implemented in 2014. Both the revenue and expenditure estimates in Table 11 are the same as in Table 10. As in Table 9 and Table 10, an annual inflation rate of 2% is assumed and the average costs and revenue of the last five fiscal years (2007-2011) is used as the basis for the projections. Operations costs are considerably higher in 2016 for the installation of the double vault toilet at Sand Island.

**Table 11: San Juan River Program Cost Recovery Estimates**

Fiscal Year	Revenues with Proposed Fee Increase	Total Expenditures	% of Annual Costs Recovered By Proposed Fee Revenue	100% Cost Recovery Per Person SRP Fee Rate (includes the proposed application fee)		
				SI – MH <sup>1</sup>	MH – CH	SI – CH
2013	\$163,000	\$254,200	64%	\$10.20	\$20.40	\$30.60
2014	\$273,000	\$272,300	100%	\$9.96	\$19.92	\$29.88
2015	\$273,700	\$277,700	99%	\$10.14	\$20.28	\$30.42
2016	\$274,400	\$317,200	87%	\$11.88	\$23.76	\$35.64
2017	\$275,000	\$303,200	91%	\$11.22	\$22.44	\$33.66
<b>Total</b>	<b>\$1,259,100</b>	<b>\$1,424,600</b>	<b>88%</b>	<b>\$10.68</b>	<b>\$21.36</b>	<b>\$32.04</b>

<sup>1</sup> River Segments: SI - MH = Sand Island to Mexican Hat, MH - CH = Mexican Hat to Clay Hills, SI - CH = Sand Island to Clay Hills

The per person SRP fee rate that would generate 100% of the annual revenues needed to cover the San Juan River program’s full operating costs for the next five years, without appropriated funding, would require an approximately 78% increase in the current per person SRP fee rate.

Including revenue from the additional \$6.00 application fee, the per person per trip SRP fees would need to be raised to \$10.68 for the Sand Island to Mexican Hat segment, \$21.36 for the Mexican Hat to Clay Hills segment, and \$32.04 for the Sand Island to Clay Hills segment in order to achieve 100% cost recovery over the next five fiscal years. A 78% increase of the per person SRP fees would generate an estimated \$1,172,900 in revenue over the next five fiscal years. The per person SRP revenue, plus an estimated \$162,300 in commercial SRP fees, plus \$90,000 in non-commercial application fees would bring the total program revenue for five years to \$1,425,200. Total expenditures are estimated to be \$1,424,600.

The proposed fee increase assumes a continuation of available appropriated funding; however, it anticipates that San Juan River fee revenue will be used to cover a much greater share of the costs of operating the program. If the San Juan River program were to run on fee revenue alone, current Special Area fees would need to be raised by 78% rather than the proposed amount of 66% to cover annual costs through 2017. The proposed 66% increase of per person SRP fees, plus a \$6.00 application fee, provides long term program sustainability with a reduction in the amount of appropriated funding allocated to the river program. San Juan River fee revenues would be able to cover 88% of program costs from 2013 to 2017 at the same level of visitation as the last five fiscal years.

#### Fair Market Value Fee Calculation Method

The Fair Market Assessment approach compares the permit and application fees charged for boating similar rivers in the western United States that are being administered by federal land management agencies. Table 12, on the following page, compares the permit and application fees for various western rivers with an allocated permitting system. The current, proposed, and 100% cost recovery San Juan River permit fees are offered as comparison.

The services and facilities provided at the sites listed above are similar to those of the San Juan River. All of the rivers have an allocated permitting system, provide on-site ranger services, and offer a backcountry river recreation experience. For the purpose of comparing fees, each river permit was quantified by length of trip. When comparing fees using this method, current San Juan River fees are 37% less than the average cost of comparable federal river fee programs of \$8.55 per person per 25 river miles. The cost of floating the San Juan River from Sand Island to Clay Hills is currently \$5.36 per person per 25 river miles (\$5.56 from Sand Island to Mexican Hat and \$5.26 from Mexican Hat to Clay Hills). It should also be noted that the San Juan River is currently the only river in this grouping that uses a lottery permit distribution system and does not collect an application fee.

The analysis of the value of the proposed fee increase shows that the 66% Special Area fee increase and \$6 non-commercial application fee would increase the cost per person per 25 river miles on the San Juan River from \$5.36 to \$9.15 for an eight person group. The review of other western river programs with similar services and facilities shows that the rate of \$9.15 is 7% higher than the average cost of \$8.55.

**Table 12: Comparison of River Permit Fees**

<b>River Name - Segment</b>	<b>Agency</b>	<b>Permit Distribution</b>	<b>Permit and Application Fees</b>	<b>Trip Length</b>	<b>Cost per Person per 25 River Mi.<sup>1</sup></b>
Colorado – Cataract	NPS	Reservation	\$30 per trip + \$20 per person	70 mi.	\$8.48
Colorado – Grand Canyon	NPS	Lottery	\$100 per person + \$25 application fee	226 mi.	\$11.41
Colorado – Westwater	BLM	Reservation	\$10 per person	17 mi.	\$14.71
Green – Desolation	BLM	Lottery	\$25 per person + \$6 application fee	84 mi.	\$7.66
Green – Dinosaur	NPS	Lottery	\$185 per trip + \$15 application fee	44 mi.	\$14.20
Rio Chama	BLM	Lottery	\$5 per person + \$6 application fee	42 mi.	\$3.42
Rogue	BLM	Lottery	\$10 per person + \$6 application fee	50 mi.	\$5.38
Salmon – Main	USFS	Lottery	\$4 per person per day + \$6 application fee	79 mi. (6 days)	\$7.83
Salmon – Middle Fork	USFS	Lottery	\$4 per person per day + \$6 application fee	99 mi. (7 days)	\$7.26
Salt	USFS	Lottery	\$125 per trip + \$10 application fee	52 mi.	\$8.12
San Juan (current)	BLM	Lottery	\$18 per person	84 mi.	\$5.36
Yampa	USFS	Lottery	\$185 per trip + \$15 application fee	71 mi.	\$8.80
<b>AVERAGE COST (per person per 25 river miles)</b>					<b>\$8.55</b>
San Juan (100% cost recovery)	BLM	Lottery	\$32 per person + \$6 application fee	84 mi.	\$9.75
<b>San Juan (proposed)</b>	<b>BLM</b>	<b>Lottery</b>	<b>\$30 per person + \$6 application fee</b>	<b>84 mi.</b>	<b>\$9.15</b>

<sup>1</sup> In calculating “cost per person per 25 river miles”, the San Juan average group size of eight people was used. Where application fees are charged, the table assumes one application per group was submitted. Where per person per day fees are charged, an estimation of approximately 15 river miles per day was used and rounded up to a whole day.

## **H. Impacts from Changing and Not Changing Recreation Fee Rates**

### Anticipated Results of Modifying the Current Fee Rates

#### *Benefits to Recreational Users*

If the Special Recreation Permit (SRP) fees were raised and a new non-commercial application fee was implemented, current services and facility maintenance standards in the San Juan River program would continue uninterrupted for recreational users. The modified fees would offset the rising costs of operating the San Juan River program and additional revenues would be used to improve San Juan River facilities as part of routine upgrades and by providing additional maintenance staffing for facility upkeep.

The modified fees would also be used to enhance aspects of the San Juan River permitting process, using information technology to make both private and commercial permitting more user-friendly. In addition, the proposed fees would provide river rangers with more on-site staff support; improving service, resource planning and protection, visitor safety, and the recreational experience for San Juan River users for years to come.

#### *Benefits to the Local Economy*

It is important to the local economy for the San Juan River program to have the financial ability to maintain and improve, as necessary, the current services and facilities associated with commercial and private recreational boating on the San Juan River, as well as protect the quality of the backcountry recreation experience. The San Juan River program provides a high-quality eco-tourism experience that draws approximately 11,500 recreational users to San Juan County annually. These visitors purchase food, gas, lodging, and vehicle shuttle services in the communities of Bluff, Mexican Hat, Blanding, and Monticello. In 2011, approximately 1,800 visitors went on commercially guided San Juan River trips with local San Juan County outfitters, and an additional 1,169 visitors went with other Four Corners area guides. Commercial passengers spent over a million dollars for guiding services on the San Juan River in 2011, based on commercial SRP post-use reports received by the BLM.

#### *Benefits to the Environment*

San Juan River permit fees enable the Monticello Field Office to operate the San Juan River permitting program. Launch limits in the permitting system serve to reduce negative impacts to sites and resources associated with higher levels of visitation through a narrow river corridor. By having the financial ability to provide an allocated permitting system for San Juan River boaters, the BLM is able to manage the amount of visitor use and reduce visitor impacts to a fragile desert ecosystem and cultural resources. Permit requirements and on-site ranger patrols also serve to educate visitors about river use stipulations that are designed to protect the San Juan River resource area, such as the use of a portable toilet system and fire pan. Rangers routinely perform visitor check-ins and patrols to ensure compliance with those stipulations. Additional environmental benefits may be realized from the development of a new river management plan with updated analysis and management of river resources.

*Socioeconomic Impacts, including Low-Income Populations*

Increasing per person SRP fees by 66% will have minimal impact on the ability of private boaters or commercial passengers to afford a San Juan River trip. A 2001 Utah State University shows approximately 70% of San Juan boaters are in the professional, technical, or managerial occupation categories. The permit fee is relatively low expense when considering the total costs of organizing a private river trip on the San Juan River (e.g. fuel, meals, vehicle shuttles, and equipment purchase or rental). Table 13 estimates the total costs of a private river trip from Durango, Co and Flagstaff, AZ, the two closest communities with significant San Juan River visitation. Most private river trips are cost-sharing trips, meaning each individual pays for his or her share of the trip costs, including the permit fee. A 66% increase in the Special Area fee would mean an individual would pay an additional \$4.00, \$8.00, or \$12.00 per trip, depending on the respective river segment. It is unlikely that this slight increase would impact an individual who is participating in what is already a relatively expensive recreational activity. The permit fee only represents a nominal portion of the cost to go with a commercial guide. A 3-day commercially guided trip on the Sand Island to Mexican Hat segment of the San Juan River costs approximately \$700 per person. The \$10 proposed per person SRP fee is only 1.4% of the total cost of taking a guided raft trip. Impacts to low-income populations are expected to be minimal.

**Table 13: Estimated Cost of San Juan River Private Trip**

<b>3 day trip from Sand Island to Mexican Hat, 8 people (average group size)</b>			
<b>Costs</b>	<b>Amount</b>		<b>Explanation</b>
	<b>Durango, CO</b>	<b>Flagstaff, AZ</b>	
Fuel	\$101	\$167	Fuel for 2 vehicles round trip to Sand Island plus vehicle shuttle to Mexican Hat at 20 mpg at \$3.45 a gallon (UT, CO, AZ current avg.)
Equipment	\$120	\$120	Estimated cost of 2 rafts plus equipment for 3 days, based on 10 river days per year, 15 years of ownership, \$3000 for each fully equipped raft = \$20 per raft per day
Current Permit Fees	\$48	\$48	8 people at \$6 per person.
Trip Total with Current Fees	\$269	\$335	-
Trip Total with Proposed Fees	\$307	\$373	8 people at \$10 per person plus \$6 application fee = an additional \$38 in permit fees.

The estimates in Table 13 show that current permit fees only represent 14% of the cost of a private 3-day river trip for boaters from Durango, Co and 16% of the cost of a private river trip for a group from Flagstaff, AZ. The proposed fees would add an additional \$38 in permit fees which would increase total trip costs for the Durango group by 14%, and would increase total



trip costs for the Flagstaff group by 11%. With the proposed fee increase, Special Recreation Permit fees would account for 28% of the total cost of a 3 day trip from Sand Island to Mexican Hat for boaters from Durango, and 23% for boaters from Flagstaff. Durango and Flagstaff are the two closest communities with significant visitation. Boaters coming from more distant communities bear higher fuel costs. The equipment cost estimates in Table 13 are modest. Trip costs are higher for boaters who rent equipment or purchase newer equipment. In addition, trip costs are higher for boaters who hire shuttle services.

The proposed \$6.00 non-commercial permit application fee is not expected to have a significant impact on private boaters either. Again, \$6.00 is low when considering the total costs of a San Juan River trip. When split amongst a group of 8 visitors (average San Juan River group size) it amounts to 75 cents per person. The smaller the group size, the greater the impact the application fee would have on total trip costs. Lacking the option to cost share, the total fees for a solo boater floating the Sand Island to Clay Hills segment would jump from the current fee of \$18.00 to \$36.00 with the proposed Special Recreation Permit fee increase and application fee. However, it is fair for a party of one to pay the same application fee as a party of 25 because each application requires the same amount of service and costs the Monticello Field Office the same amount to process.

#### Anticipated Result of Not Modifying Special Area Fee

A failure to increase fees would mean the San Juan River SRP program would continue to rely heavily on appropriated funding to support the public's river recreation opportunities. The fee account balance has steadily decreased to the point where a lack of appropriated funding or consecutive years of severe drought would disrupt the continuity of operations, as the annual fee account revenue and carry-over fund balance is currently less than the annual costs of operating the program. A disruption or decrease in the current level of service would have negative impacts on recreational users, the local economy, and the environment.

#### *Negative Impacts to Recreational Users*

A shrinking balance in the San Juan River fee account would result in a decrease in essential staffing, and deterioration in infrastructure upkeep and timely facility maintenance. Customer service, visitor safety, and resource protection provided through visitor contacts with BLM river rangers would also decrease with less staffing, negatively impacting the quality of the recreational experience. Reduced ranger staffing could result in less compliance with launch limits and resource protection stipulations, resulting in over-crowding and environmental damage. All 11,500 annual San Juan River visitors travel and camp through the same narrow river corridor, making the need to control negative impacts to the environment a high priority. With visitation concentrated in such a limited area, negative impacts can easily occur, and when they do they can impact the recreation experience of all users.

#### *Negative Impacts to Local Economy*

If fees are not modified, the BLM could lose the financial ability to manage the San Juan River up to current standards and maintain the quality of the recreational experience. Not raising the fee could lead to the erosion of services and facility maintenance, as well as, the ability to protect the natural resource. A decrease in BLM river ranger presence could lead to degradation of the river corridor, as a result of less compliance with river regulations and use limitations that protect

the resource and the quality of the experience. River rangers also routinely perform trash clean-up on river patrols. A damaged resource and over-crowding would detract visitors who float the river to enjoy its wilderness qualities and feeling of isolation. Those visitors could seek other rivers for their backcountry river adventure. Should people be less likely to recreate on the San Juan River and spend their vacation dollars locally, the San Juan County economy would be significantly impacted.



*A BLM river ranger's productive day of trash collection on the river*

### *Negative Impacts to the Environment*

Regular river ranger patrols and compliance checks are essential in ensuring that river users comply with river regulations and use required equipment to reduce impacts to the environment, such as portable leak-proof toilet systems and fire pans. In 2011, BLM river rangers and volunteers contacted and performed compliance checks on 81% of the groups launching on the San Juan River. If fee rates were to stay the same, staffing would have to be reduced, resulting in less compliance checks and patrols. Compliance with river stipulations would likely decrease with less ranger presence, resulting in negative environmental impacts in the river corridor.

Use limits were originally established on the San Juan River in 1980 for the protection of the environment and potential wild river values of the river from Sand Island to Clay Hills. Use limits mitigate the negative impacts to wildlife and riparian resources in the narrow river corridor that would result from over-crowding and unrestrained dispersed camping. Failure to properly maintain and enforce use limits, due to a reduction in staffing levels and river ranger compliance checks and patrols, would result in the reestablishment of many of the negative impacts to the environment that provided the impetus to the San Juan River permit program. For example, over-crowding would push boaters out of established camping areas and into more undisturbed areas to camp along the river corridor, creating more impacts to riparian resources and disturbing wildlife.

In addition, river rangers perform regular trash clean-up and minor campsite maintenance on each of their river patrols. A large quantity of trash is continuously washed down the San Juan

River from communities and developments upstream into the BLM managed river segment. A reduction in staffing would likely lead to more trash accumulation between Montezuma Creek and Clay Hills, further impacting the environment.

#### *Socioeconomic Benefits, including Low-Income Populations*

Maintaining the current fees would keep San Juan River trips more affordable for low-income visitors. However, excluding the cost of permit fees, river boating is still an inherently expensive recreational activity for both private and guided visitors. It is likely that the majority of San Juan River visitors have an average to above-average income. The fee is a small part of the total cost of a river trip.

### **I. Public Outreach**

In accordance with the Federal Lands Recreation Enhancement Act, the Monticello Field Office provided the public with an opportunity to review and comment on the proposed fee changes and intended use of fees, and presented the fee proposal and draft business plan to the Utah Recreation Resource Advisory Council for its formal review. The 15-member advisory panel approved the proposed fee increase and program changes on 2/22/2013.

The public comment period was open for 37 days, from 12/20/2012 to 1/25/2013. Written comments could be submitted by email or letter. The *Draft Business Plan for the San Juan River* and notice of the public comment period was posted on the BLM Utah, BLM Monticello Field Office, and BLM San Juan River Permits websites. A news release was sent to statewide print and broadcast media, as well as to regional print media in Durango, CO, Grand Junction, CO, and Flagstaff, AZ. Links to the draft business plan were posted on the BLM Utah Facebook and Twitter social media websites; as well as online boating community forums Mountain Buzz and Utah Rafters. The comment period coincided with San Juan River permit lottery application period. During this time, the BLM Monticello website and San Juan River Permits webpage receive the highest amount of visitors during the year. Notice of the plan and public comment period were posted alongside the 2013 permit application link on the BLM Monticello website to reach as many river users as possible. Email notification was sent to all of the San Juan River commercial outfitters and notification of the plan and comment period was given at the Utah Guides and Outfitters Meeting on 11/8/2012.

The Monticello Field Office received 50 written comments. Comment details and responses are available in Appendix A of this plan. A general summary of the comments and major themes is provided below:

- 34% or 17 support all of the proposed fee changes
- 38% or 19 were in favor of the application fee
- 36% or 18 opposed the proposed fee changes
- 30% or 15 were neutral, ambiguous, general questions, or did not apply to the proposed fee changes

Many commenters that both supported and opposed the proposed fees would like the Monticello Field Office to prioritize the use of fee revenues for improvements within the river corridor, such

as invasive plant removal, improving existing campsites, creating new campsites within the reserved camping area, and improving facilities at Clay Hills. The Monticello Field Office recognizes the benefits these improvements would provide to river runners. The first step to addressing these issues is the implementation of the proposed fees. The proposed fees will provide the fiscal resources and staffing to maintain current operations and services and fund a comprehensive river management plan. The suggested improvements and their impacts on resources are beyond the scope of this document and will be considered in future interagency river management planning efforts.

Many of the suggested improvements for the lower canyon and Clay Hills fall within Glen Canyon National Recreation Area (GLCA). A General Agreement between the BLM and GLCA, effective 7/10/2012, authorizes BLM to manage river permitting for the GLCA portion of the San Juan River to Clay Hills. However, each agency is responsible for its own resource management within the river corridor. The General Agreement states that the BLM and GLCA will develop a joint river management plan and will cooperate on specific resource issues including, camp status and resource protection, exotic plant control, threatened and endangered and special status species management, wilderness and Wild and Scenic River issues, and aquatic invasive species control and education. Any improvements at Clay Hills or in the reserved camping area would have to be in accordance with GLCA resource management policy.

Many commenters felt that the facilities at Sand Island and Mexican Hat, as well as river program staffing are adequate or more than adequate and should not be a priority for the use of fees. In accordance with the 2008 *Approved BLM Monticello Field Office Resource Management Plan*, minimal visitor services at the Sand Island and Mexican Hat ramp areas will be provided. Only routine annual maintenance expenditures and occasional significant infrastructure upkeep and facility improvement expenses are planned at those sites. River staffing is just adequate enough to complete routine and critical duties and respond to emergencies. This leaves little to no additional staff time to complete important non-routine duties and projects such as resource monitoring and river management planning. Planning and monitoring are essential to meeting the BLM San Juan River SRMA goal to provide outstanding river related recreational opportunities and visitor experiences while protecting natural and cultural resource values.

Another reoccurring theme in the comments was the need for a joint interagency permit with the Navajo Nation so river runners using Navajo Nation land along the river don't have to purchase a separate permit. The Monticello Field Office recognizes the benefits that a joint permit would provide to San Juan River users and will strive to work closely with our interagency partners and consider the issue in future river planning efforts.

The need for the Monticello Field Office to complete a comprehensive interagency river management plan for the San Juan River was pointed out in multiple comments. Some commenters felt that a comprehensive plan should precede a business plan. Monticello Field Office staff recognizes the need for a comprehensive river management plan and it is a top funding priority. The proposed fee increase in this business plan is an essential first step to providing the fiscal resources to complete a plan and keep river program operating at its current level of service until a comprehensive plan can be completed.

## **J. Addendum: Proposal to Move to Recreation.gov**

### **Introduction**

As originally proposed in Section C of this document, Proposed Modifications to Recreation Fee Rates and Permit Distribution, the BLM proposes to distribute non-commercial permits for the San Juan River through a secure online permitting system. The BLM proposes to distribute permits through Recreation.gov beginning December 1<sup>st</sup>, 2014 for the 2015 river season. Non-commercial boaters will be able to apply for reservations in the permit lottery, reserve launch dates, make changes to permits, and make fee payments online through Recreation.gov. A call-in option would also be available through Recreation.gov. Commercial permits will continue to be administered by the Monticello Field Office and will not be included on Recreation.gov. The proposed changes will have no impact on commercial use.

Recreation.gov is an online trip planning and reservation system that includes 12 federal agencies, including the BLM, Forest Service, National Park Service, Bureau of Reclamation, Fish and Wildlife Service, and the Army Corps of Engineers. It currently offers advance reservations at 2,500 federal areas for over 60,000 facilities and activities. Reservations for many popular whitewater river trips in the region, including Desolation-Gray Canyons of the Green River, the Middle Fork of the Salmon River, the Main Salmon, Selway River, Hell's Canyon of the Snake River, as well as the Yampa River and Green River in Dinosaur National Monument are currently issued through Recreation.gov.

### **Rationale for Move to Recreation.gov**

Moving from the current mail-in lottery and call-in reservation system to the Recreation.gov reservation system will improve customer service for the public by providing boaters with 24 hour, seven day a week access to complete routine San Juan River permit transactions. The current reservation system utilizes a single phone line during limited business hours, making the river office difficult to contact. Boaters must complete transactions between 8:00 am and 12:00 pm, and often spend much of their time redialing and getting a busy signal. Boaters must disrupt their work schedules to call to complete routine permit transactions such as booking a reservation or making a fee payment. The mail-in lottery system is an inconvenient multi-step process that requires applicants to download, print, and mail an application along with a personal check or money order to the Monticello Field Office. Recreation.gov will provide applicants with a simple one-stop online lottery application process, which will eliminate the need for boaters to print an application and mail payment.

The BLM river office will still be an available point of contact for the public. Through Recreation.gov boaters will be able to complete routine permit transactions online at their convenience, which will reduce unnecessary phone traffic to the river office. Reduced phone traffic will result in improved customer service by making the BLM river office staff more readily available to answer trip planning questions or complete non-routine permit transactions.

The move to Recreation.gov would benefit the BLM by reducing the amount of time spent by river office staff completing routine transactions such as data entry and payment processing throughout the year. It will also eliminate the task of processing the mail-in lottery, which requires up to five weeks of intensive staff labor to process locally. The move to Recreation.gov

will allow river office staff to work on other elements of the river and recreation program, including management planning, interpretation, volunteer coordination, facility improvement projects, resource monitoring, and providing improved customer service to boaters who have trip planning questions or need to complete non-routine permit transactions.

Additional benefits to the public and BLM by moving to the Recreation.gov reservation system include reducing paper waste produced by the mail-in lottery system and strengthening customer information security. The move to Recreation.gov would eliminate the need for BLM staff to obtain and handle boater’s personally identifiable information and credit card information. Recreation.gov meets the strict federal standards for online information security.

**Proposed Changes to the Non-commercial Permit Process and Business Rules**

**Table 14: Summary of Proposed Changes to Permit Process for Move to Recreation.gov**

Permitting Element	Current Process	Proposed Change
<b>Application/Transaction Fee</b>	A \$6.00 “application” fee is collected once per applicant per calendar year for all transactions.	A \$6.00 “transaction” fee would replace the application fee and would be collected per each new transaction.
<b>Lottery Season</b>	Reservations for trips launching April 1 <sup>st</sup> – October 31 <sup>st</sup> are initially distributed through a permit lottery. All other dates and cancellations are available to book by telephone as “first come/first served” reservations.	Reservations for trips launching April 15 <sup>th</sup> – July 15 <sup>th</sup> would be initially distributed through a permit lottery. All other dates and cancellations would be available to book online as “first come/first served” reservations.
<b>Permit Fee Payment Due Date</b>	30 days prior to the launch date.	March 15 <sup>th</sup> for all lottery winners (success notifications would be sent February 12 <sup>th</sup> ), or immediately at the time a non-lottery reservation is made.
<b>Refund Policy</b>	If a permit is cancelled or group size reduced a minimum of 30 days prior to the launch date, a <b>credit</b> is issued to the reservation holder that may be applied to another San Juan River permit within the same calendar year. The \$6.00 application fee is non-refundable.	If a permit is cancelled or group size reduced a minimum of 31 days prior to the launch date, a full <b>refund</b> of fees is issued to the reservation holder. The \$6.00 transaction fee is non-refundable.

The Monticello Field Office is proposing to make changes to the non-commercial permit process and business rules in connection with the move to Recreation.gov. Proposed changes include changes to the lottery season, fee payment due date, refund policy, as well as the replacement of the current application fee with a transaction fee of the same amount.

#### *Application/Transaction Fee*

The current \$6.00 lottery and reservation application fee would be replaced by a \$6.00 transaction fee, as described in Section C, page 16, of the approved business plan. The \$6.00 transaction fee is collected on the BLM's behalf and is the minimum transaction fee charged for all federal sites that Recreation.gov provides reservation services for. The difference between the current application fee and the proposed transaction fee is that the current application fee is only charged once per applicant for the calendar year and covers multiple transactions, whereas the proposed transaction fee would be charged for each new transaction. For example, an unsuccessful lottery applicant who obtains a cancelled reservation after the lottery would pay \$6.00 to apply in the lottery, as well as \$6.00 to book the cancelled reservation. Making changes to an existing reservation or accepting a successful lottery reservation is not considered a separate transaction and the \$6.00 transaction fee would not be charged.

The transition to Recreation.gov would result in a net decrease in the total amount of application/transaction fees collected by the Monticello Field Office. 2014 is the first year that the BLM has charged an application fee for the San Juan River lottery and reservations. Through June of 2014, the Monticello Field Office collected approximately \$26,250 in application fees for 4375 applications. The Monticello Field Office estimates that it will receive approximately 50 new applicants over the remainder of the year, bringing the total application fees collected to \$26,550 for the year. Each year, approximately 350 to 400 unsuccessful lottery applicants book reservations after the lottery, and 100 more reservations are for an applicant's second or third trip. As a result, the estimated number of annual transactions that would result in a \$6.00 fee with the proposed transaction fee would increase by approximately 500 and the total amount of transaction fees collected would be \$29,250. Approximately, \$4.50 of every \$6.00 online transaction on Recreation.gov would go toward the reservation services and customer service improvements provided by Recreation.gov. The Monticello Field Office would collect approximately \$1.50 of every \$6.00 online transaction, which would also be used to manage the San Juan River permit program. The Monticello Field Office estimates it will receive approximately \$7,310 from Recreation.gov transaction fees in 2015, resulting in a \$19,240 decrease from the application fee revenue for 2014.

The Monticello Field Office implemented the application fee in 2014 for the cost recovery of processing the lottery and maintaining the reservation system. The majority of this workload and cost would be moved to Recreation.gov. The loss of revenue to the river program would be compensated by decreasing the amount of San Juan River fee revenues used to pay a portion of the salary of the Recreation Assistant who currently handles the permit program. The Recreation Assistant position would be funded from other recreation sources, as the scope of the position's workload would be significantly less focused on routine San Juan River permitting duties, and would be expanded to meet other Monticello Field Office recreation needs.

### *Lottery Season*

The permit lottery season would be reduced to trips launching April 15<sup>th</sup> through July 15<sup>th</sup>. Section C, page 17, of the approved business plan describes the rationale for shortening the season in which reservations are initially distributed through the permit lottery. Permits are required year-round and would be obtained through “first come, first served” online reservations for trips launching January 1<sup>st</sup> through April 14<sup>th</sup>, trips launching July 16<sup>th</sup> through December 31<sup>st</sup>, and for all cancellations and available reservations after the lottery.

### *Permit Fee Payment Due Date*

Lottery winners would receive a notification of success on February 12<sup>th</sup> and would be required to pay their permit fees and accept their reservations by March 15<sup>th</sup>. Unaccepted and unpaid reservations would then be made available to other boaters beginning March 16<sup>th</sup>. Boaters obtaining non-lottery reservations and cancellations would be required to make payment at the time they book their reservations. This differs from the current policy which allows reservation holders to make payment up to a minimum of 30 days in advance of their launch date. The new fee payment policy is proposed to improve reservation availability by making launch dates available to rebook sooner and more predictably after the lottery and by reducing “abandoned” reservations. In addition, the proposed fee payment policy is more consistent with other federal river programs in the region who utilize Recreation.gov for online permitting.

Unsuccessful lottery applicants and other boaters seeking reservations after the lottery would benefit from the new fee payment deadline, which would require lottery winners to take action on their reservations by March 15<sup>th</sup>. This would create more reservation availability sooner and more predictably for boaters who would be able to obtain reservations beginning March 16<sup>th</sup>. Currently, the permit process allows reservation holders up to 30 days prior to the launch date to make payment. The result has been a high cancellation rate for reservations obtained through the lottery and then “abandoned” by the reservation holders because there is no initial investment or early acceptance deadline. In 2014, for the proposed lottery period of April 15<sup>th</sup> through July 15<sup>th</sup>, 18% or approximately one out of every five lottery reservations were cancelled by the BLM at the 30 day deadline due to non-payment with no notification from the reservation holder. The new payment deadline will free up those reservations held by boaters who do not intend to use their reservations because they were drawn for a trip on another river, or they intend to go on another group member’s permit instead, or other circumstances in which the reservation holder knows prior to March 15<sup>th</sup> that they will not be utilizing their reservation.

Requiring a refundable fee payment or deposit at the time of reservation would keep reservation holders more invested in their reservations without posing additional financial risk than the current 30 day payment policy. The proposed refund policy will still allow boaters to hold a reservation at ultimately no cost as long as they cancel 31 days prior to the launch. While fee payment would be required earlier than the current system requires, the proposed refund policy which would allow full refunds for cancellations up to 31 days in advance of the launch date, would offset any new financial risk to reservation holders imposed by an earlier fee payment due date. However, requiring fee payment up front will keep reservation holders more invested in their permits, and they would be more likely to cancel their reservations sooner, or reduce their group size sooner because they will receive a refund for the per person fees up to 31 days in advance of the trip.



It is to the benefit of the public to be consistent, wherever possible, with the permitting business rules and timelines of other regional federal river permitting programs who are utilizing Recreation.gov. Many boaters apply for reservations on multiple rivers throughout the region and keeping track of each river program's respective timelines and permitting rules can be difficult. With the proposed fee payment deadline, the San Juan River would have the same key dates for the lottery application open period (12/1 to 1/31), lottery reservation acceptance/payment deadline (3/15), and post-lottery reservation release date (3/16) as the Desolation-Gray Canyons of the Green River and the four rivers included in the Four Rivers permit lottery. This will allow groups who are drawn for reservations on multiple rivers to receive their success notices at approximately the same time and decide which reservations they will utilize and which reservations they will release. Unaccepted reservations for all rivers will then be made available at the same time for unsuccessful lottery applicants to plan and rebook.

### *Refund Policy*

Recreation.gov would provide a full refund of per person permit fees for cancelled permits and group size reductions that are made up to 31 days in advance of the reservation launch date. The \$6.00 transaction fee is non-refundable. There would be no refunds for cancellations and group size reductions made 30 days or less before the launch date. Currently, if boaters cancel 30 days prior to their launch date, they can only get a credit for their fees that must be applied to another river trip on the San Juan River within the same calendar year and there are no refunds or credits for cancellations and group size reductions made within 30 days of the launch date.

Boaters would benefit from the proposed refund policy because most boaters, under the current credit policy, are unable to plan another trip and use their credit for a trip later in the same year. Unable to take advantage of the credit, they lose their permit fees. Credits offer no incentive to cancel for those boaters who cannot use them. By providing refunds, boaters will have more incentive to cancel their launches and reduce their group size in a timely manner which will benefit other boaters who are seeking reservations or to increase their group size.

The Monticello Field Office does not expect a significant decrease to San Juan River permit fee revenue as a result of the proposed refund policy. Currently, ten or less paid permits are cancelled prior to the 30 day deadline. Most reservations cancelled prior to the 30 day deadline are unpaid, while most paid reservations are cancelled less than the 30 day deadline to receive a credit.

### **Socioeconomic Impacts of Proposed Changes**

Overall, the move to Recreation.gov is expected to have beneficial impacts for San Juan River boaters. Under the current call-in system, individuals who must work during the limited river office hours of 8:00 am to noon are at a significant disadvantage for obtaining competitive launch dates. Electronic transactions are the modern business standard and will allow boaters of most socioeconomic backgrounds to complete transactions fairly and at their own convenient time. In 2014, 90% of San Juan River applicants elected to have their reservations emailed, rather than sent via US Mail. For the small minority of individuals without internet access, the San Juan River permit office and Recreation.gov call center would be available to call for reservation assistance.

The difference in frequency of when the current BLM application fee is charged and when the replacement transaction fee would be charged could affect approximately 450 to 500 San Juan River boaters. This includes approximately 350 to 400 unsuccessful lottery applicants who would have to pay a second \$6.00 transaction fee to book a reservation after the lottery and approximately 100 boaters who book multiple trips. The impact of the proposed change to these San Juan River boaters is considered negligible when considering the overall costs of a San Juan River trip (see Section H, page 32 of the approved business plan).

The proposed fee payment deadline is expected to have no significant impact to San Juan River boaters. Fee payment will be required sooner; however, the proposed refund policy would provide a refund of those fees until 31 days in advance of the launch date. Therefore, there is no additional financial risk by requiring reservation holders to pay sooner. The proposed refund policy would also benefit boaters who would not be able to take advantage of the current credit policy and would lose their fees.

### **Public Outreach**

Prior to making the changes proposed in the addendum of the *Amended Business Plan for the San Juan River* (Section J of this document), the Monticello Field Office is conducting the following outreach efforts to notify the public of its opportunity to review and comment on the proposed move to Recreation.gov and the associated changes to business rules contained in the Addendum:

- Posting the *Amended Business Plan for the San Juan River* on the BLM Utah and Monticello Field Office websites;
- Issuing a News Release to statewide print and broadcast media;
- Posting notices at the San Juan River informational kiosks;
- Posting links to the *Amended Business Plan for the San Juan River* on the BLM Utah Facebook, Twitter, and other social media websites and on popular river running websites such as Mountain Buzz and Utah Rafters;
- Notifying all San Juan River commercial SRP holders of the amended plan via phone or email.

At the conclusion of the 30-day public comment period on the *Amended Business Plan for the San Juan River*, the Monticello Field Office will present the proposed move to Recreation.gov to the Utah Recreation Resource Advisory Council (RAC) for its formal review. The Utah Recreation RAC is a 15-member advisory panel which provides advice and recommendations to the BLM and U.S. Forest Service on proposed modifications to their recreation fee programs in Utah. The Federal Lands Recreation Enhancement Act mandates that the appropriate Recreation RAC reviews all BLM recreation fee proposals prior to approval. Comments on "*Section J. Addendum: Proposal to Move to Recreation.gov*" from both the public at large and the Utah Recreation RAC will be considered prior to approval of the changes. Only comments relating to the Addendum will be considered in this public outreach effort. The remainder of the San Juan River Business Plan was approved in November 2013 after a formal public comment period and Utah Recreation RAC consultation. The original document has not been revised outside of the Addendum.

## Appendix A: Public Comment Matrix

#	Comment Type	Summary	Response
#01	SCTF	Suggest fees be increased more than proposed amount to \$15, \$30, and \$45 to totally cover program costs, provide cushion for future inflation, and fund invasive plant removal efforts in campsites.	Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing.
#02	SUOF	Invest fees in an online permit system.	Considered and added to document. Section C describes proposed modifications to permit distribution, including an online permit system.
#03	SUOF	Install portable toilet dumping station at Sand Island.	A portable toilet dumping station was considered by BLM staff but was not identified as a top funding priority at this time.
#04	SUOF	More of the fee revenue should be used toward ecological purposes and preserving the environment.	Comment noted. Considered in the plan, with the proposed fee increase more resources would be available for ecological purposes except where prohibited by FLREA Sec 808 (b). See section I, Public Outreach.
#05	GSWC	Application fee should be credited toward cost of permit.	Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing.
#06	DNA	Disagree with commercial vs. private launch allocation. Would like to see number of private launches increased.	Comment noted. Outside the scope of the document. Commercial vs. private launch allocation is based on analysis in the 2008 Monticello Record of Decision and Final Resource Management Plan.
#07	GSWC	Commercial fee revenue seems low considering the rates they charge passengers. Commercial operators may not be reporting their receipts accurately and paying their fair share.	Commercial SRP holders pay 3% of their total receipts plus per person SRP fees. The cost of \$700 per person/per 3 day trip noted in the plan is the typical cost for a vacationing family for a 3 day guided trip on the San Juan River. However, approximately 50% of commercial trips are day trips, which cost about \$150 per person. In addition, many commercial outfitters offer discounted rates for low-income or disadvantaged groups, and/or are education-based non-profits with lower fees for students.

#08	NUMR	(1) A comprehensive river management plan should be completed and implemented before a business plan that only addresses fees. (2) Commercial launch allocation system, commercial "pirating", and online launch calendars hurt commercial business. (3) Plan contradicts itself by saying that visitation is expected and unexpected to grow. (4) BLM needs to monitor how use is impacted by any changes made to fees and permitting process.	(1) Considered. See section I, Public Outreach. (2) Commercial launch allocation is outside the scope of the business plan. The Monticello Field Office adheres to BLM policy in defining and permitting commercial groups. Any commercial "pirating" is occurring without the knowledge of the BLM Monticello Field Office. Both private and commercial boaters have equal access to the online launch calendars to obtain launches. Commercial outfitters have a separate allocation pool from private boaters, which is not available to private boaters until 15 days in advance of a launch date. (3) The plan states that visitation to the Monticello Field Office resource area is expected to grow, while river visitation is not expected to grow due to launch limits. (4) The Monticello BLM tracks visitation and permitting statistics annually.
#09 - 17	GS	9 comments.	Comments noted.
#18	NUMR	(1) River runners don't need picnic tables and shade structures; plant native trees instead. (2) FLREA does not allow for permit fee on the San Juan River.	(1) Comment noted. (2) FLREA allows for Special Area permit fees in Sec 803 (3)(h). See page 4, Background and Authorities.
#19	SUOF	Oppose proposed fee increase without upgrades to Clay Hills take-out.	Considered. See section I, Public Outreach.
#20 - 21	OLOS	Increased fees will discourage visitation and exclude some visitors.	Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. USU demographic study results and estimated trip costs have been added to the socioeconomic impact analysis in Section H.

#22	NUMR	<p>(1) Plan should propose ideas to reduce costs instead of increasing fees. (2) Creating new camp locations on lower river may decrease management costs and increase use. (3) Commercial SRP should pay more than 3% fee and guides should pay per person SRP fees. (4) Fees are high, considering over 50% of the river corridor is managed by Navajo Nation and Glen Canyon National Recreation Area. (5) BLM is overcharging San Juan boaters to enter Glen Canyon and should charge the same amount that the NPS charges for other entry points. (6) Lottery fee above the cost of running the lottery and unfair to unsuccessful applicants who receive no benefit from the fee. (7) Online permit system would make permitting more efficient and less costly, so fees should be reduced, not increased. (8) Increased staffing and infrastructure are not beneficial to boaters.</p>	<p>(1) The recommended fee increases are warranted to keep pace with inflation and regional recreation pricing. Eventually fees need to be increased to cover increased operating and labor costs without reducing the current level of services provided. The results of a visitor survey conducted in 2012 show a high degree of visitor satisfaction with the current level of service provided and BLMs goal for the San Juan River is to provide for outstanding river related recreational opportunities and visitor experiences. (2) Considered. See section I, Public Outreach. (3) 3% fee is determined on national level and outside the scope of the document. BLM Manual H-2930-1 Section G(e)(1) excludes commercial crew. (4) BLM is solely responsible for river permit administration through a General Agreement with Glen Canyon National Recreation Area. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing for other river corridors that are managed by multiple land management agencies. (5) SRP fees are charged for use of the San Juan River Special Recreation Management Area. BLM does not charge a fee for entry into Glen Canyon National Recreation Area, as the SRP authorizes river use to Clay Hills. (6) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. (7) While an online permitting system would make permitting more efficient and user friendly it will not necessarily reduce costs or staff time. (8) Comment noted.</p>
#23	NUMR	<p>(1) Support online permit system. (2) Sand Island does not need additional vault toilet. (3) Increased fees will discourage visitation and exclude some visitors.</p>	<p>(1) Comment noted. (2) Comment noted. (3) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. USU demographic study results and estimated trip costs have been added to the socioeconomic impact analysis in Section H.</p>

#24	NUMR	<p>(1) Why is the disparity between commercial fee revenue (approx. 19%, Table 8) and commercial use (approx. 27%, pg.12) not being addressed? (2) Application fee should be credited toward permit fees. (3) Plan should consider cutting costs and reducing ranger presence before increasing fees.</p>	<p>(1) Clarified in Table 8 of document. Commercial fees in Table 8 are in addition to the per person SRP fees collected for their passengers. (2) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. (3) The recommended fee increases are warranted to keep pace with inflation and regional recreation pricing. Eventually fees need to be increased to cover increased operating and labor costs without reducing the current level of services provided. A 2012 visitor satisfaction survey (attachment C) showed that 94% of visitors are satisfied overall with the facilities, services, and recreational opportunities available at the San Juan River. The goal of the river program is to provide a high quality recreational experience and paid staff who are knowledgeable about the resource and appropriately trained are an important component contributing to the success of the program and overall visitor satisfaction.</p>
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#25	NUMR	<p>(1) Increasing fees to reduce dependence on appropriated funding and making the river program more self-sustaining is not in conformity with agency policy. (2) Plan should address interagency permit with Navajo Nation. (3) It is unclear what type of fee authorized by FLREA is being charged. (4) Plan assumes trips consist of cost-sharing adults and doesn't consider impact of fee increase on families. (5) Plan should show how much it costs to issue a permit. (6) What is justification for charging permit fees on a per person basis instead of per permit? (7) Public comment period was poorly timed over the holidays.</p>	<p>(1) Although increasing fees will reduce dependence on appropriated funding, Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. The business plan has been reviewed and found to be in conformance with agency policies as outlined on page 4, Background and Authorities. (2) Considered. See Section I, Public Outreach. (3) Clarified in document. See pg. 4, Background and Authorities. (4) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. (5) Permit costs vary by individual permit. Individual permit costs were not analyzed in detail as total permitting costs are sufficient to analyze cost recovery for the services provided. (6) By charging on a per person basis, individuals in both large and small groups bear an equal and fair burden in supporting river program costs. (7) Considered. See section I, Public Outreach.</p>
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#26	NUMR	<p>(1) Comprehensive river management plan should be completed before a business plan. (2) Improvements at Clay Hills would benefit users more than increasing personnel. (3) FLREA does not provide authority to collect fees for non-commercial boating use of San Juan River. (4) Downstream motorized travel conflicts with Glen Canyon National Recreation Area policy. (5) Rivers where no user fees are charged were left out of fair market value fee analysis. (6) The objective of making the river program self-sustaining contradicts principal 3 of the 2005 BLM Recreation Fee Guidelines which states, "Fee revenues will not be used to supplant normal appropriations."</p>	<p>(1) Considered. See Section I, Public Outreach. (2) Considered. See Section I, Public Outreach. (3) FLREA allows for Special Area permit fees in Sec 803 (3)(h). Clarified in document. See pg. 4, Background and Authorities. (4) Comment noted. Outside the scope of the document. (5) Free river programs are generally not allocated, have little visitation, or are sufficiently funded by commercial permit fees. (6) The fee increase is consistent with the fee collection authorities outlined on pg. 4 and is in conformance with the most current direction BLM Utah Instruction Memorandum UT 2013-037: <i>Utah Recreation Fee Program Toolbox</i>. The amount of the recreation fee is commensurate with the benefits and services provided to the visitor and comparable to fees charged for similar recreational opportunities in the area as illustrated on pg. 19 Table 12. Base funding allocated to the Monticello BLM recreation program is used to support a range of outdoor recreation opportunities including locations where no fee is charged for participating in recreational activities as stated in principle 4 of the 2005 BLM Recreation Fee Guidelines. The recommended fee increases are warranted to keep pace with inflation. Eventually fees need to be increased to cover increased operating and labor costs of the San Juan River program without reducing other "no-fee" opportunities to recreate in other Monticello BLM managed areas where minimal services and facilities are provided free of charge, but at some cost to the BLM.</p>
#27	NUMR	<p>(1) Public comment period was poorly timed over holidays. (2) Increased fees will exclude lower income visitors. (3) Use recreation.gov for online permitting.</p>	<p>(1) Considered. See section I, Public Outreach. (2) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. USU demographic study results and estimated trip costs have been added to the socioeconomic impact analysis in Section H. (3) Considered and added to document. Section C describes proposed modifications to permit distribution, including an online permit system.</p>
#28 - 34	OLOS	7 comments.	Comments noted.



#35	NUMR	(1) Raising fees will have substantial impact on families with dependent children because children don't have means to pay fees and cost-share. (2) Fees should not be used to increase ranger staffing. (3) Fees should go towards improving vehicle security at Mexican Hat, improving Clay Hills take-out site, and a combined permit system with the Navajo Nation. (4) Improve and increase number of camps in last 17 miles as an alternative way to increase revenue by making river trips on the lower section more desirable and floatable at lower water levels.	(1) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. USU demographic study results and estimated trip costs have been added to the socioeconomic impact analysis in Section H. (2) Considered. See section I, Public Outreach. (3) Fee increase will support extra law enforcement ranger who patrols Mexican Hat boat ramp. Improvements at Clay Hills take out are subject to environmental analysis and approval by Glen Canyon National Recreation Area. BLM will continue to work with agency partners in managing the San Juan River. (4) Considered. See section I, Public Outreach.
#36	DNA	Don't like the Navajo Nation permit system	Comment noted. Outside the scope of the document.
#37	DNA	Do not charge fee to use OHVs in area.	Comment noted. Outside the scope of the document.
#38	SUOF	Improve take-out at Clay Hills; clean up major campsites in the river corridor by removing excess tamarisks and willows; have all involved agencies work together to improve major sections of the river.	Considered. See section I, Public Outreach.
#39	SCTF	Proposed fee increase should only be for private permits and should not be imposed commercial outfitters.	The per person SRP fee must be applied equally to private parties and commercial passengers.
#40	GC	Plan should show why funds are needed and how they will be used.	Considered. Section F describes how funds will be used. Section G and H describe why the funds are needed.
#41	NUMR	(1) Public notice for public comment period was insufficient. (2) Use additional funds for: interagency river permit with Navajo, ensuring assigned campsites are accessible and useable, collecting trash flushed down the river, mitigating invasive species in river campsites. (3) Visitor river experience would not be improved with more facilities or ranger staff.	(1) Considered. See section I, Public Outreach. (2) Considered. See section I, Public Outreach. (3) Considered. See section I, Public Outreach.

#42	NUMR	(1) Comprehensive river management plan should be completed before a business plan. (2) Increased fees will impact the ability for disadvantaged youth to participate in educational trips. (3) Coordinate an interagency river permit with the Navajo Nation. (4) Reduce labor costs by reducing paid staffing and increasing volunteers. (5) Support an additional vault toilet at Sand Island. (6) Recommend shade structures at Clay Hills. (7) Commercial launch allocation system and online launch calendars hurt commercial business.	(1) Considered. See section I, Public Outreach. (2) Considered. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. (3) Considered. See section I, Public Outreach. (4) See response above in #24 (3). (5) Comment noted. (6) Considered. See section I, Public Outreach. (7) Commercial launch allocation is outside the scope of the document. Both private and commercial boaters have equal access to the online launch calendars to obtain launches. Commercial guides have a separate allocation pool from private boaters, which is not available to private boaters until 15 days in advance of a launch date.
#43	SUOF	Use fee revenue for the following: Invasive plant species removal, an interagency permit with Navajo Nation, improvements at Clay Hills take-out, improving river access between Montezuma Creek and Sand Island with simplified on-site fee collection. Staffing and maintenance support are a lower priority.	Considered. See section I, Public Outreach.
#44	DNA	Against proposal unless BLM reduces cattle access in river corridor.	Comment noted. Outside the scope of the document.
#45	NUMR	(1) Public comment period was poorly timed over holidays. (2) Day trip river runners pay no fees and also use toilet at Sand Island.	(1) Considered. See section I, Public Outreach. (2) River runners pay the same fees for day trips as multi-day trips.
#46	DNA	Found out about plan at the last minute, didn't have time to respond.	Comment noted. See Section I, Public Outreach.
#47	NUMR	(1) Reserve campsites for entire river segment. (2) It appears private boaters are receiving a larger percentage increase in SRP fees than commercial boaters. (3) Consider volunteer trips for boaters to do trash clean-up.	(1) Comment noted. Outside the scope of the document. (2) The proposed fee increase is the same for commercial and private visitors. (3) The BLM coordinates several volunteer clean-up trips each year, as needed.

#48	NUMR	<p>(1) Public comment period was poorly timed over holidays. (2) It is unclear what type of fee authorized by FLREA is being charged. (3) Increasing fees to reduce dependence on appropriated funding and making the river program more self-sustaining is not in conformity with agency policy. (4) Plan should show how much it costs to issue a permit. (5) What is justification for charging permit fees on a per person basis instead of per permit? (6) An additional toilet at Sand Island not necessary. (7) Plan should address interagency permit with Navajo Nation. (8) Concerned about impacts of limiting permit season.</p>	<p>(1) Considered. See Section I, Public Outreach. (2) Clarified in document. See pg. 4, Background and Authorities. (3) See response above in #26(6). (4) Permit costs vary by individual permit. Individual permit costs were not analyzed in detail as total permitting costs are sufficient to analyze cost recovery for the services provided. (5) By charging on a per person basis, individuals in both large and small groups bear an equal and fair burden in supporting river program costs. (6) Comment noted. (7) Considered. See Section I, Public Outreach. (8) Permits are still required year-round on the San Juan River. Shortening the lottery permit season is being considered.</p>
#49	NUMR	<p>(1) Plan incorrectly assumes private boaters have more money than commercial patrons. (2) Plan assumes multi-day trippers rather than day trippers are using toilets at Sand Island. (3) Cattle are negatively impacting the river corridor. Should consider raising grazing fees.</p>	<p>(1) The proposed fee increase is the same for commercial and private visitors. (2) Multi-day trip and day trip users are subject to the same permit fees. (3) Comment noted. Outside the scope of document.</p>

#50	NUMR	<p>(1) Public comment period was poorly timed over holidays and insufficient. (2) Why will river runners have to pay two fees to use Sand Island and recreate on the river? (3) Do visitation statistics include commercial day users? (4) Do private and commercial day users have to get a permit and pay a fee? (5) What is the daily launch allowance? (6) Plan should provide monthly and daily launch statistics for the year. (7) When do the majority of commercial trips occur? (8) Is the fee increase the same for all river runners, including commercial crew? (9) Explain discrepancy in number of applications received. Plan says 4,200 and 5,000. (10) How was a 25% decrease in the number of applications received with the proposed application fee calculated? (11) Is the application fee being used as a disincentive to participation?</p>	<p>(1) Considered. See section I, Public Outreach. (2) The Sand Island Campground fee is a separate Expanded Amenity Fee for camping at the developed campground at Sand Island. Campground staffing and facility costs are not included in the cost of a San Juan River SRP. River runners only pay the additional fee if they choose to camp at the campground. (3) Yes. (4) Yes. (5) 75 people or 7 groups from Sand Island and 50 people or 3 groups from Mexican Hat. (6) Considered. Monthly statistics are provided in Appendix B. BLM staff consider daily use statistics to be too variable and too small of units to be useful as part of the analysis in the business plan. Average visitors per day per month are included in Appendix B. (7) See monthly statistics in Appendix B. (8) The fee increase is the same for private and commercial visitors, commercial crew are exempt. BLM Manual H-2930-1 G(e)(1) excludes commercial crew. (9) The BLM receives 4,200 applications for the permit lottery, but receives a yearly total of 5,000 applications. (10) The anticipated 25% decrease in the number of applications received is an estimate based on BLMs experience at Desolation Canyon when an application/reservation fee was implemented. (11) No. Clarified in Section C of the document.</p>
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#50 (Cont.)	NUMR	<p>(12) If an online permitting system and shortened lottery season will increase permitting efficiency, why are fees being raised? (13) Who pays for the vault toilet pumping service provided by the National Park Service? (14) Why are cutbacks not considered in the document? (15) Could you please provide the amount of commercial cancellation penalty fees collected over the last 5 years? (16) Could you explain why the business plan presents the appearance of increased use as a need to increase fees? (17) Why should multi-day river runners have to pay for toilets also used by day use river runners? (18) Given the rationale to decrease the lottery season to 3 months, why are volunteer services needed for 6 months?</p>	<p>(12) While an online permitting system would make permitting more efficient and user friendly it will not necessarily reduce costs or staff time. (13) Clarified in Section D of the document. (14) The operational costs of the San Juan River program have increase over the past 12 years while no fee increases have occurred. The consumer price index increased (30%) during the same time period, which has effectively cut the program budget due to inflation. (15) The Monticello Field Office collected \$7,650 in commercial cancellation penalty fees from 2007-2011 for an annual average of \$1,530. These fees are included in Table 8 of the document. (16) The plan states that increased use on the San Juan River is not expected. Section G describes the results of BLM's cost recovery and fair market value fee analysis. The recommended fees are warranted to keep pace with inflation and comparable to regional river recreation pricing. (17) Multi-day trip and day trip users are subject to the same permit fees. (18) While a majority of lottery permit applications are for a 3 month period, actual use is consistently high for a majority of the river season. See Appendix B.</p>
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#50 (Cont.)	NUMR	(19) Why do river runners need to pay increased fees so cost savings can be used to benefit non-river related recreation. (20) Table 12 is flawed. Rivers are not comparable and there is no rhyme or reason to fees charged on any river. (21) Why does the plan not compute how many dollars private river runners bring to the regional economy? (22) What is the justification for a solo boater with the least impact, paying the highest fee increase? (23) How many groups checked for compliance were outside of compliance? Wouldn't a high level of compliance mean less compliance checks are needed? (24) How do you justify the statement that river running is an inherently expensive activity with no data presented to support the statement?	(19) Funds are appropriated to the Monticello Field Office for multiple recreation program needs. If river use fees are not periodically raised to adjust for inflation and rising operating costs, the river program increasingly draws more appropriated funds away from other recreation program needs. (20) While it is difficult to compare various river programs, the Monticello Field Office staff believe the fair market value fee analysis in the document presents an accurate comparison of river fees. (21) The Monticello Field Office attempted to obtain this information, but there was simply no data available at the time of the writing of this plan. (22) The proposed fee increase is the same for all commercial and private visitors. (23) No data is available at this time. Groups who are outside of compliance are often given assistance by river rangers who educate the groups and help them comply with river use stipulations, when possible. (24) Clarified. Estimated costs have been added to Section H of the document.
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**Comment Type Key**

- DNA = Does Not Apply
- GS = General Support
- GSWC = General Support with Comment or Question
- NUMR = Numerous Comments or Questions
- OLOS = Overall Lack of Support
- SCTF = Suggested Change to Fees
- SUOF = Suggested Use of Fees

**Appendix B: San Juan River Visitation by Month 2007-2011**

		<b>Jan-Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov-Dec</b>	<b>Total</b>
<b>2007</b>	<b>Commercial Passengers</b>	103	287	707	818	414	251	146	221	0	<b>2,947</b>
	<b>Private Boaters</b>	545	1,235	1,351	1,216	952	515	584	508	251	<b>7,157</b>
	<b>Total Visitors</b>	648	1,522	2,058	2,034	1,366	766	730	729	251	<b>10,104</b>
<b>2008</b>	<b>Commercial Passengers</b>	148	339	629	766	489	317	178	198	0	<b>3,064</b>
	<b>Private Boaters</b>	575	1,226	1,378	1,715	1,251	702	495	750	0	<b>8,092</b>
	<b>Total Visitors</b>	723	1,565	2,007	2,481	1,740	1,019	673	948	0	<b>11,156</b>
<b>2009</b>	<b>Commercial Passengers</b>	144	465	759	907	308	239	171	147	0	<b>3,140</b>
	<b>Private Boaters</b>	631	1,211	1,723	1,621	1,304	622	710	572	137	<b>8,531</b>
	<b>Total Visitors</b>	775	1,676	2,482	2,528	1,612	861	881	719	137	<b>11,671</b>
<b>2010</b>	<b>Commercial Passengers</b>	116	257	562	734	345	228	168	173	0	<b>2,583</b>
	<b>Private Boaters</b>	531	948	1,708	1,745	1,353	717	927	643	174	<b>8,746</b>
	<b>Total Visitors</b>	647	1,205	2,270	2,479	1,698	945	1,095	816	174	<b>11,329</b>
<b>2011</b>	<b>Commercial Passengers</b>	127	313	758	596	481	117	242	124	0	<b>2,758</b>
	<b>Private Boaters</b>	678	1,205	1,477	1,845	1,511	730	789	756	180	<b>9,171</b>
	<b>Total Visitors</b>	805	1,518	2,235	2,441	1,992	847	1,031	880	180	<b>11,929</b>
<b>Avg.</b>	<b>Visitors Per Month</b>	720	1497	2210	2393	1682	888	882	818	148	
	<b>Visitors Per Day</b>	23*	50	71	80	54	29	29	26	2	

\*Nearly all of Jan-Mar visitation is in March. The average visitors per day for Jan-Mar was calculated using 31 days.

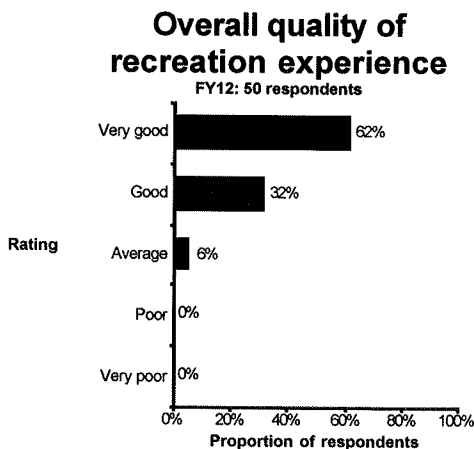
# Sand Island Visitor Survey

## Introduction

In order for the Bureau of Land Management (BLM) to comply with the Government Performance and Results Act (GPRA), and better meet the needs of the public; a visitor satisfaction survey was conducted at 24 BLM recreation sites in 13 states during fiscal year 2012 (FY12). The survey was developed to measure each site's performance related to BLM GPRA Goal 3.1 - *Provide for a quality recreation experience, including access, and enjoyment of natural and cultural resources on DOI managed and partnered lands and waters*; and Goal 3.2 - *Provide for and receive fair value in recreation*. The information collected during the survey will also help the BLM better serve the public. The survey collected visitor satisfaction data regarding visitor information (i.e., use of maps, signs, brochures), developed facilities, managing recreation use, resource management, BLM staff and customer service, and educational and interpretive materials.

The results of the visitor satisfaction survey conducted at Sand Island are summarized in this data report. A description of the research methods and limitations can be found on the next page. Below (left) is a graph summarizing visitor opinions of the "overall quality of recreation experience." The satisfaction measure next to this graph is a combined percentage of "good" and "very good" responses. This is the primary performance measure for GPRA Goal 3.1 and should be used for reporting performance for this goal (NOTE the satisfaction measure may not equal the sum of "very good" and "good" percentages due to rounding).

The response rate for this site survey was 100%. The graph and satisfaction measure summarizing visitor opinions of the "value for fee paid", which is the primary performance measure for GPRA Goal 3.2, can be found on page 9.



**FY12 GPRA  
Satisfaction Measure**  
Percentage of site visitors satisfied overall with appropriate facilities, services, and recreational opportunities:

**94%**

FY12 Satisfaction measure: 94%  
Average evaluation score: 4.6





# Sand Island Research Methods

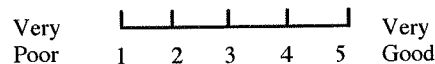


## Understanding the Results

Inside this report are graphs that illustrate the survey results. The report contains 8 categories of data regarding BLM amenities, staff, and services plus selected demographics. Within these categories are graphs for each indicator evaluated by site visitors. For example, the Visitor Information category includes indicators such as "providing useful maps and brochures," "adequate signs on site for direction," and so forth. In each category there is a graph entitled "Everything Considered". This graph is the basis for determining visitor satisfaction for each category and GPRA reporting numbers.

Each graph includes the following information:

- The number of visitor responses for the indicator;
- The percentage of responses which were "very good," "good," "average," "poor," and "very poor;"
- A "satisfaction measure" that combines the percentage of total responses which were "very good" or "good;" and
- An average evaluation score (mean score) based on the following values: very poor= 1, poor= 2, average= 3, good= 4, very good= 5.



- The higher the average evaluation score, the more positive the visitor response
- Graph percentages may not equal 100% due to rounding

## Research Methods

Surveys were distributed to a random sample of visitors at this site during a selected period in FY 12. The survey response rate is described on the first page of this report, meaning that 100% of those randomly sampled responded to the survey. The data reflect visitor opinions about this site's facilities, management, services, educational opportunities, and fees during the survey period. Visitor activities and selected demographics were also captured. A representative sample of the general visitor population were surveyed at selected locations. The results do not necessarily apply to visitors during other times of the year, or visitors who did not visit the survey locations on site.

Returned surveys were electronically scanned and the data analyzed. Frequency distributions were calculated for each indicator and category.

All percentage calculations were rounded to the nearest percent.

The survey response rate is described on the first page of this report. The sample size (n) varies from figure to figure, depending on the number of responses.

Caution is advised when interpreting any data with a sample size of less than 30. In such cases, the word "CAUTION!" is included in the graph. This report excludes any indicator with less than 10 responses.

For most indicators, the survey data are expected to be accurate with in  $\pm 6\%$  with 95% confidence. This means that if different samples had been drawn, the results would have been similar ( $\pm 6\%$ ) 95 out of 100 times.

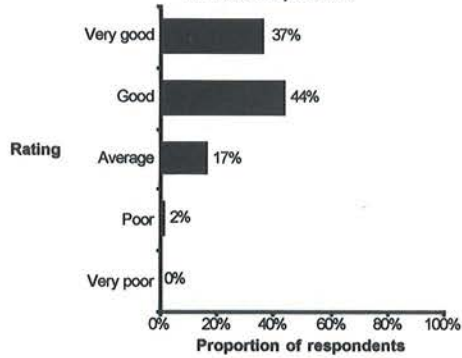
For more information about this survey, contact Jennifer Hoyer Russell, BLM Survey Project Coordinator at the University of Idaho Park Studies Unit (208) 885-4806 blm@psu.uidaho.edu



# Sand Island Visitor Information

## Providing useful maps and brochures

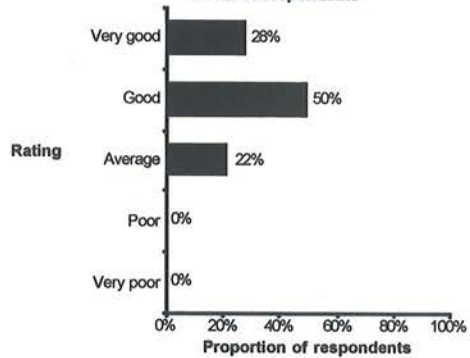
FY12: 41 respondents



FY12: Satisfaction measure: 80%  
Average evaluation score: 4.1

## Providing useful information on the Internet

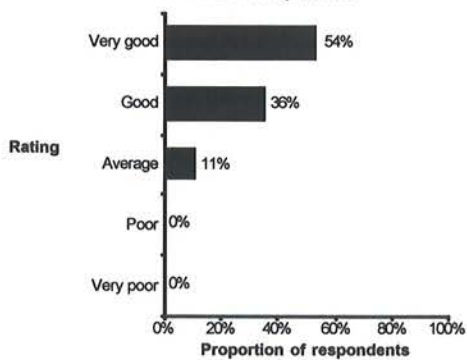
FY12: 46 respondents



FY12: Satisfaction measure: 78%  
Average evaluation score: 4.1

## Ensuring public awareness of rules and regulations

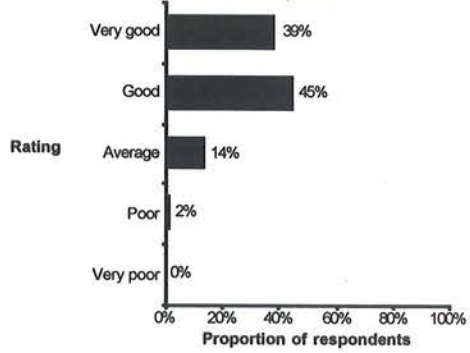
FY12: 56 respondents



FY12: Satisfaction measure: 89%  
Average evaluation score: 4.4

## Providing adequate signs on site for direction and orientation

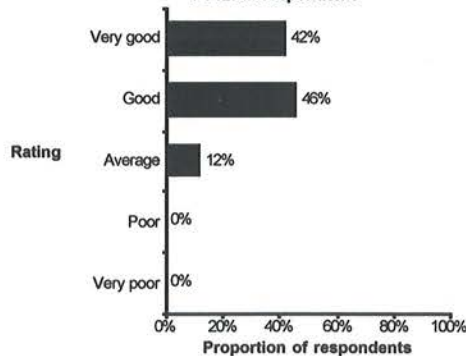
FY12: 49 respondents



FY12: Satisfaction measure: 84%  
Average evaluation score: 4.2

## Everything considered: quality of BLM visitor information

FY12: 50 respondents



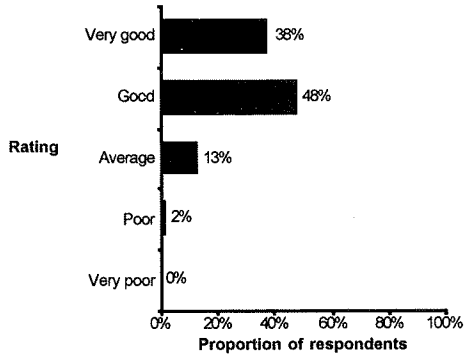
FY12: Satisfaction measure: 88%  
Average evaluation score: 4.3

# Sand Island Developed Facilities



## Maintaining roads for motorized vehicles

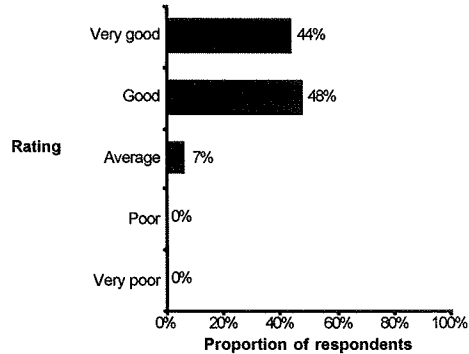
FY12: 48 respondents



FY12 Satisfaction measure: 85%  
Average evaluation score: 4.2

## Maintaining a clean site

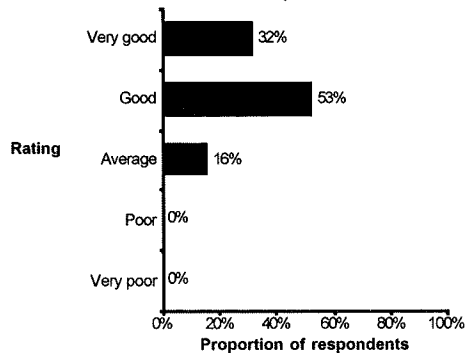
FY12: 54 respondents



FY12: Satisfaction measure: 93%  
Average evaluation score: 4.4

## Maintaining trails for non-motorized use

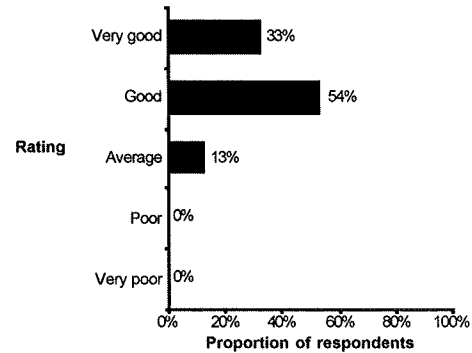
FY12: 38 respondents



FY12 Satisfaction measure: 84%  
Average evaluation score: 4.2

## Maintaining cleanliness of restrooms and other physical facilities

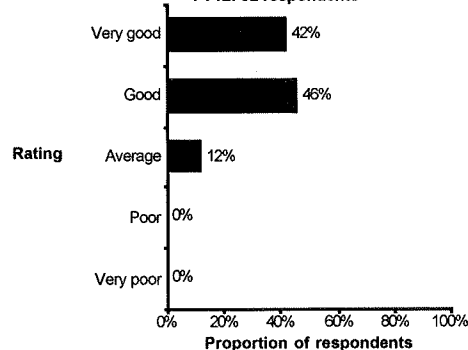
FY12: 48 respondents



FY12: Satisfaction measure: 88%  
Average evaluation score: 4.2

## Everything considered: overall condition of developed facilities

FY12: 52 respondents

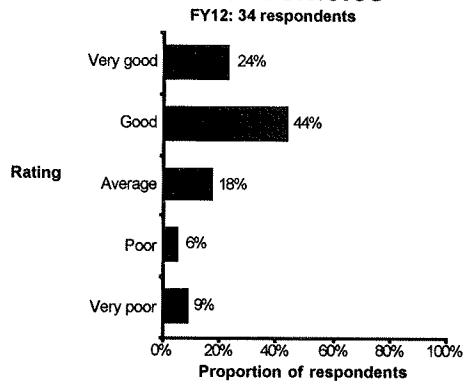


FY12: Satisfaction measure: 88%  
Average evaluation score: 4.3



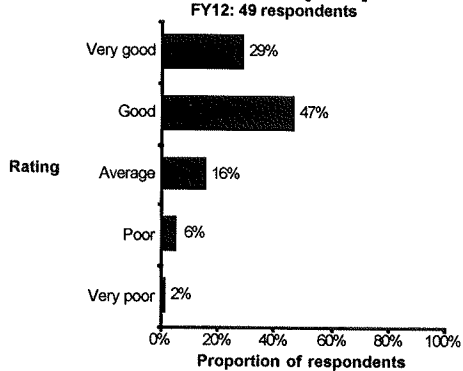
# Sand Island Managing Visitor and Recreation Use

## Managing the appropriate use of vehicles



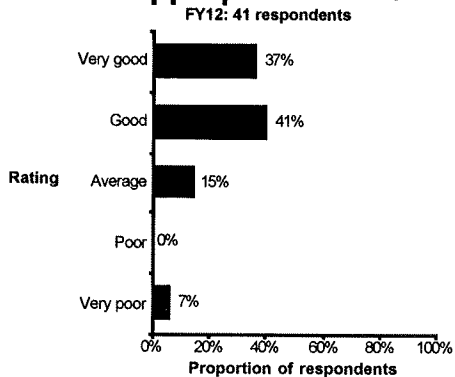
FY12: Satisfaction measure: 68%  
Average evaluation score: 3.7

## Managing the number of people



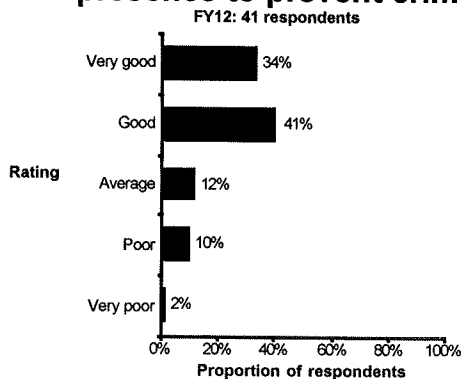
FY12: Satisfaction measure: 76%  
Average evaluation score: 3.9

## Keeping noise at appropriate levels



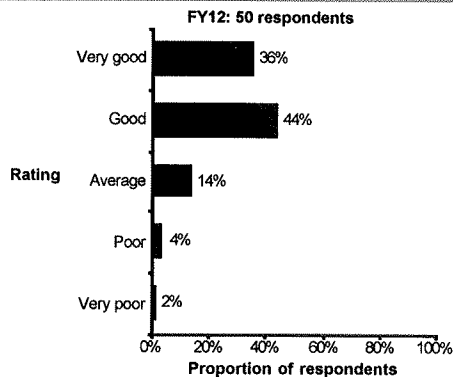
FY12: Satisfaction measure: 78%  
Average evaluation score: 4

## Providing sufficient law enforcement presence to prevent crime



FY12: Satisfaction measure: 76%  
Average evaluation score: 4

## Everything considered: visitor and recreation management



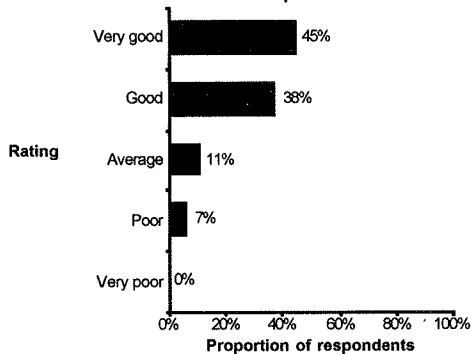
FY12: Satisfaction measure: 80%  
Average evaluation score: 4.1

# Sand Island Resource Management



## Adequately protecting the natural resources

FY12: 56 respondents

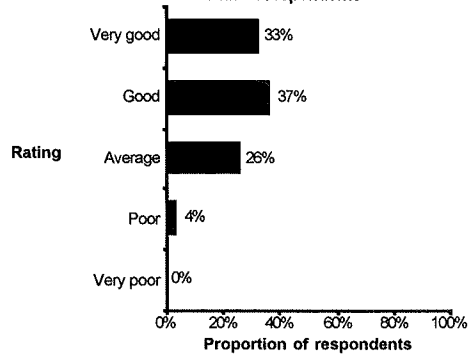


FY12

Satisfaction measure: 82%  
Average evaluation score: 4.2

## Ensuring that visitor activities do not infringe on resource protection

FY12: 54 respondents

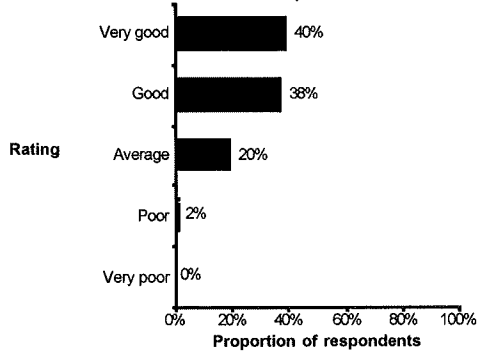


FY12:

Satisfaction measure: 70%  
Average evaluation score: 4

## Adequately protecting the cultural resources

FY12: 55 respondents

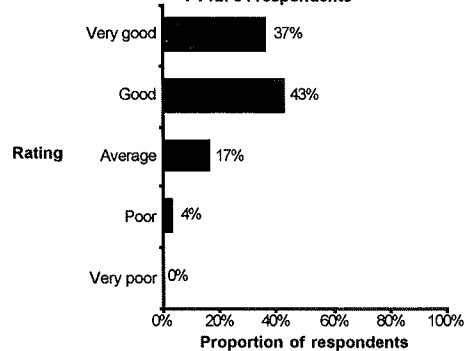


FY12

Satisfaction measure: 78%  
Average evaluation score: 4.2

## Everything considered: BLM protection of natural and cultural resources

FY12: 54 respondents



FY12:

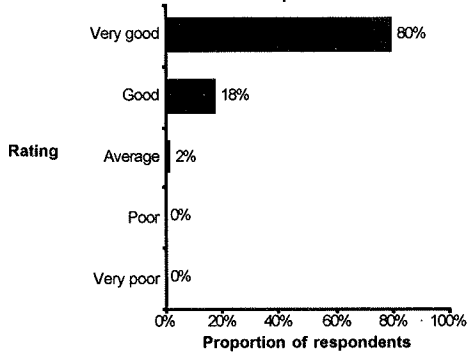
Satisfaction measure: 80%  
Average evaluation score: 4.1



# Sand Island BLM Staff and Service

## Staff treated me courteously

FY12: 55 respondents

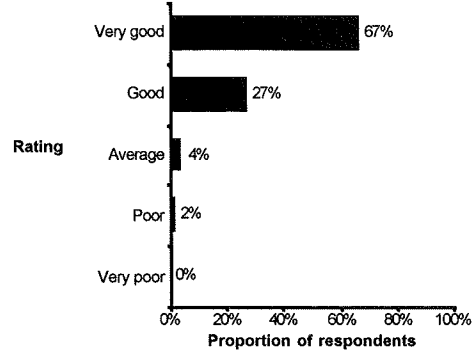


FY12

Satisfaction measure: 98%  
Average evaluation score: 4.8

## Staff demonstrated knowledge about the natural and cultural resources in the area

FY12: 49 respondents

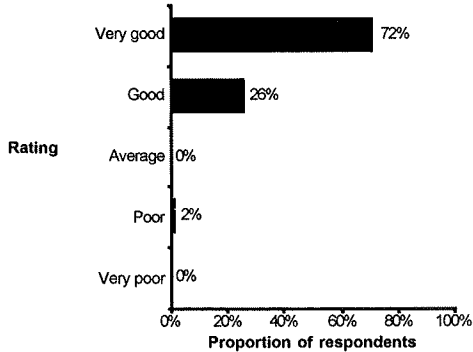


FY12:

Satisfaction measure: 94%  
Average evaluation score: 4.6

## Staff demonstrated knowledge about recreational opportunities in the area

FY12: 50 respondents

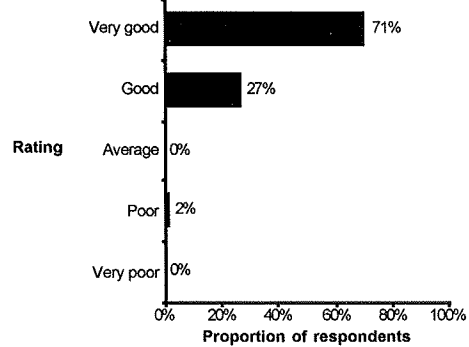


FY12

Satisfaction measure: 98%  
Average evaluation score: 4.7

## Everything considered: performance of BLM staff

FY12: 51 respondents



FY12:

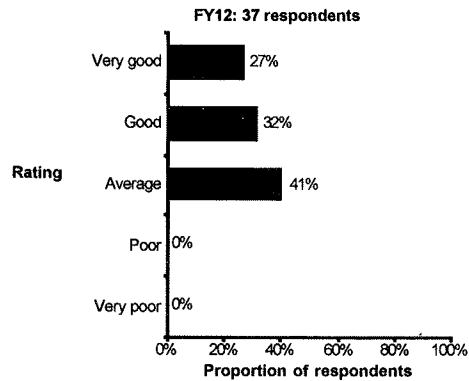
Satisfaction measure: 98%  
Average evaluation score: 4.7

# Sand Island

## Providing Educational and Interpretive Material

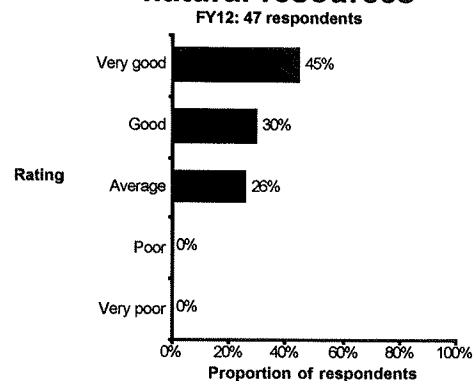


### Providing *quality* educational and interpretive material about the resources at this site



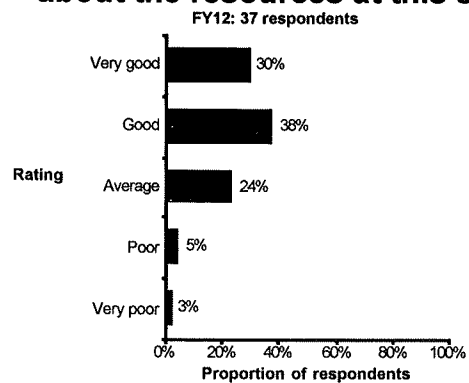
FY12      Satisfaction measure: 59%  
Average evaluation score: 3.9

### Providing stewardship information on how to protect the cultural and natural resources



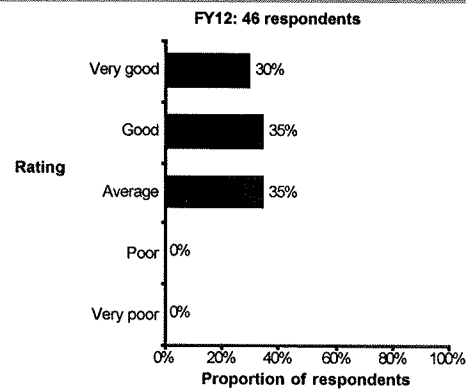
FY12:      Satisfaction measure: 74%  
Average evaluation score: 4.2

### Providing a sufficient *quantity* of educational and interpretive materials about the resources at this site



FY12      Satisfaction measure: 68%  
Average evaluation score: 3.9

### Everything considered: interpretive and educational program



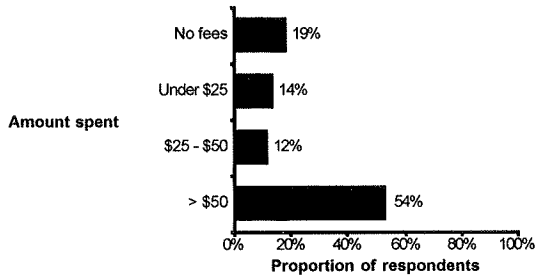
FY12:      Satisfaction measure: 65%  
Average evaluation score: 4



# Sand Island Fees

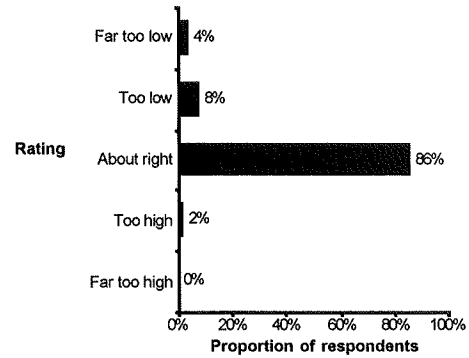
## Total fees paid

FY12: 57 respondents



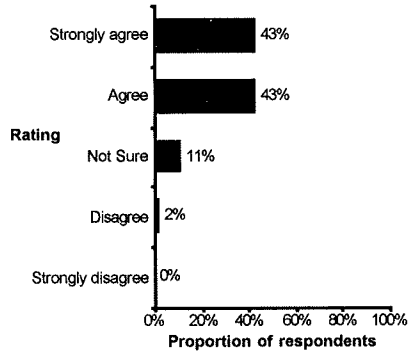
## How appropriate was the fee charged for this site/area?

FY12: 49 respondents



## The value of the recreation opportunity was at least equal to the fee asked to pay.

FY12: 46 respondents



# Commercial Recreation Operations

## Quality of Commercial Services

FY12: 4 respondents

Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.

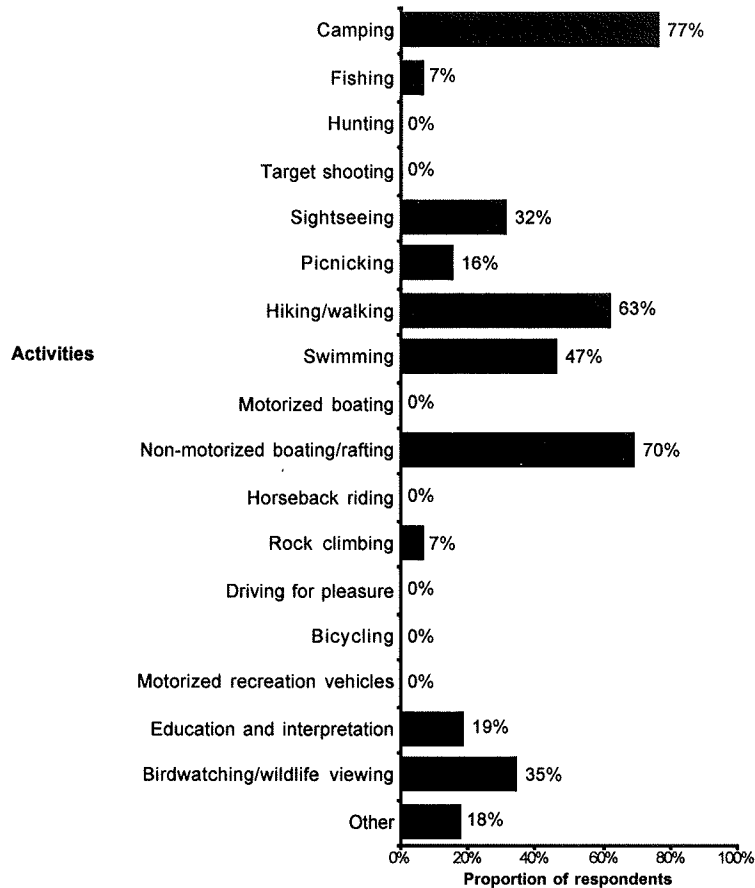


# Sand Island Primary Activities at this Site/Area



## Primary activities

FY12: 57 respondents\*\*



\*\* Percentages do not equal 100 because visitors could choose more than one activity.

## Programs (interpretive, walk, tour, exhibit, presentations, etc.)

### Quality of program(s) attended

FY12: 4 respondents

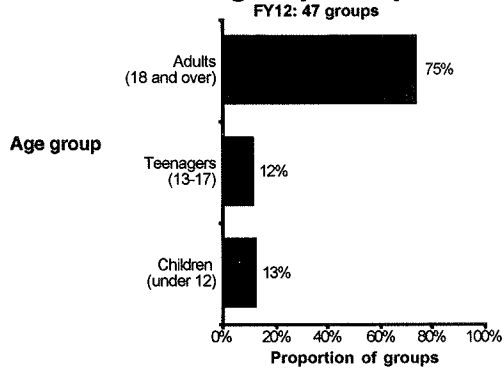
Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.

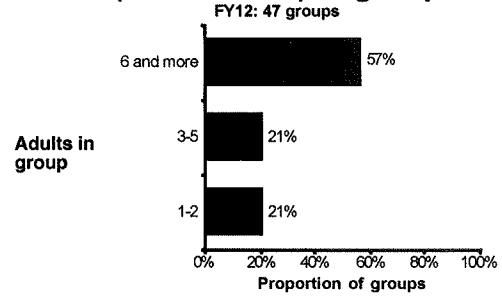


# Sand Island Demographics

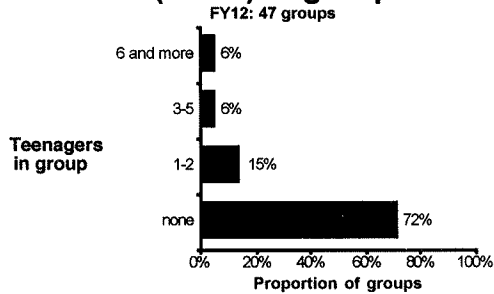
## Visitor group composition



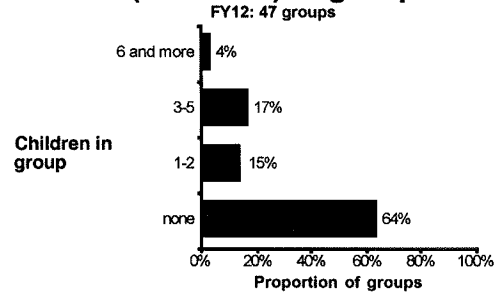
## Number of adults (18 and over) in group



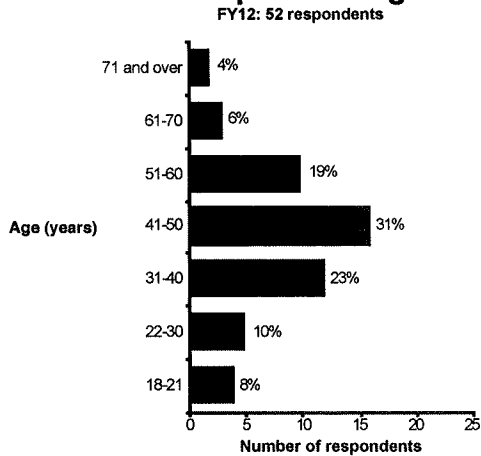
## Number of teenagers (13-17) in group



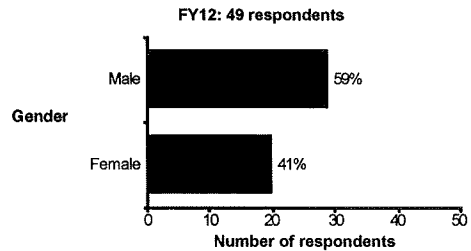
## Number of children (under 12) in group



## Respondent age



## Gender



# Sand Island Accessibility to Visitors with Disabilities



## Ability to adequately use the facilities

FY12: 7 respondents

Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.

## Ability to access exhibits, waysides, etc.

FY12: 6 respondents

Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.

## Ability to understand the messages

FY12: 7 respondents

Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.

## Ability to use the services in this area

FY12: 8 respondents

Rating

The chart for this question has been excluded because there were fewer than 10 responses. See page 2 for discussion regarding the required minimum response count.