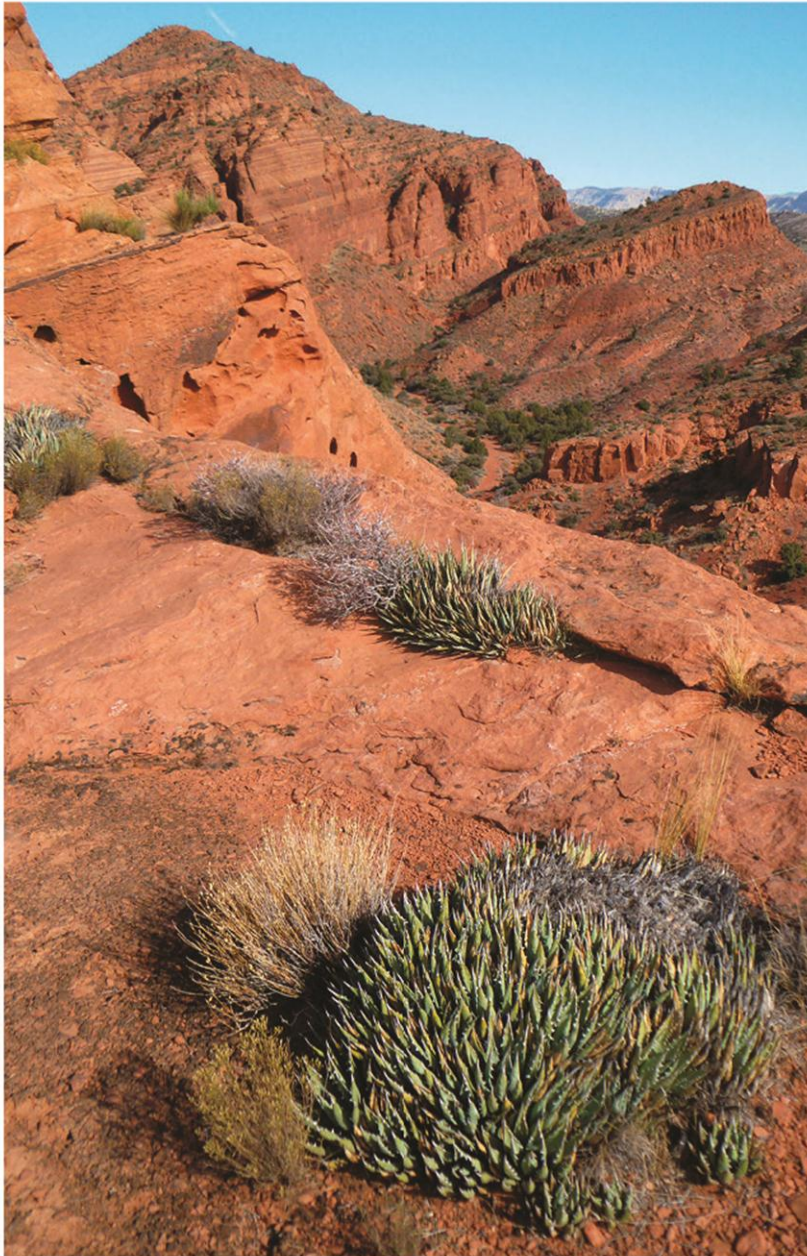
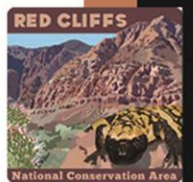


**Business Plan
Red Cliffs Recreation Area
February 2013**



**United States Department of the Interior
Bureau of Land Management
St. George Field Office
Red Cliffs National Conservation Area**



Business Plan Red Cliffs Recreation Area

RECOMMENDATIONS, REVIEWS and APPROVALS

Recommended by:

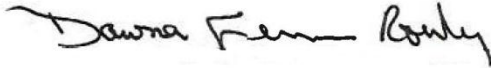


RCNCA Outdoor Recreation Planner

2/28/2013

Date

Approved By:



Dawna Ferris-Rowley, Manager
Beaver Dam Wash and Red Cliffs National Conservation Areas

2/28/2013

Date

This Draft Business Plan was prepared pursuant to Section 803 (g) of the *Federal Lands Recreation Enhancement Act* (REA -P.L. 108-447); the *Code of Federal Regulations* at 43 CFR 2930, the BLM Recreation Permit Administration Handbook (H-2930-1) and BLM Recreation and Visitor Services Program policy, as outlined in Washington Office and Utah State Office Instruction Memoranda and Information Bulletins. This business plan proposes recreation and visitor services goals and priorities for the Red Cliffs Recreation Area in the Red Cliffs National Conservation Area (Red Cliffs NCA).

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**Draft Business Plan for Red Cliffs Recreation Area
(Recreation Use Permits WBS# LVRD UT360000)
and
Environmental Assessment (BLM-UT-CO31-2013-001-EA)**

Section 1 – Introduction

1.1 Introduction

This draft Business Plan (Plan) has been prepared by the St. George Field Office (SGFO) of the Bureau of Land Management (BLM) to address needed management changes for the Red Cliffs Recreation Area (Recreation Area), located within the boundaries of the Red Cliffs National Conservation Area (Red Cliffs NCA), in Washington County, Utah. The Recreation Area includes a developed campground, day use area, non-motorized trails, and other visitor amenities that satisfy REA requirements for the collection of Expanded Amenity Fees and Standard Amenity Fees, through Recreation Use Permits (RUPs). This Plan describes how the Recreation Area is currently managed and how collected fee revenues are used for direct operating and capital costs associated with site management. It proposes increases in the recreation fee rates and identifies priorities for expenditures of collected fee revenues to maintain or improve site facilities and services to provide for high quality recreation experiences.

The Plan also proposes adjustments to the Recreation Area boundaries that will facilitate the manageability of the land base and increase the number and variety of recreation trails and other amenities available to visitors. If the proposed boundary adjustment is approved, BLM would complete the remaining steps required by FLREA to establish a new fee site where Standard Amenity Fees would be charged for use of the designated parking, trailhead facilities, designated trails, and visitor amenities of the White Reef Park. These steps include publishing a Notice in the *Federal Register* six months in advance of implementing fee collection at this site. The media publication, solicitation of public input, and Recreation Resource Advisory Council review required by FLREA are being conducted in concert with the same requirements for the Recreation Area Business Plan.

As this proposal would modify one aspect of the management of the public lands to be included in the Recreation Area, specifically the collection of fees for use of recreation facilities in the White Reef Park area, an Environmental Assessment was prepared to disclose the potential environmental consequences of the proposed boundary adjustments, in compliance with the National Environmental Policy Act (NEPA). The EA related to the proposed boundary adjustments is provided for public review and comment, as Appendix A to this Business Plan. After the public review period for the EA, BLM will sign a Finding of No Significant Impact/Decision Record, authorizing either the Proposed Action or the No Action alternative evaluated in the EA.

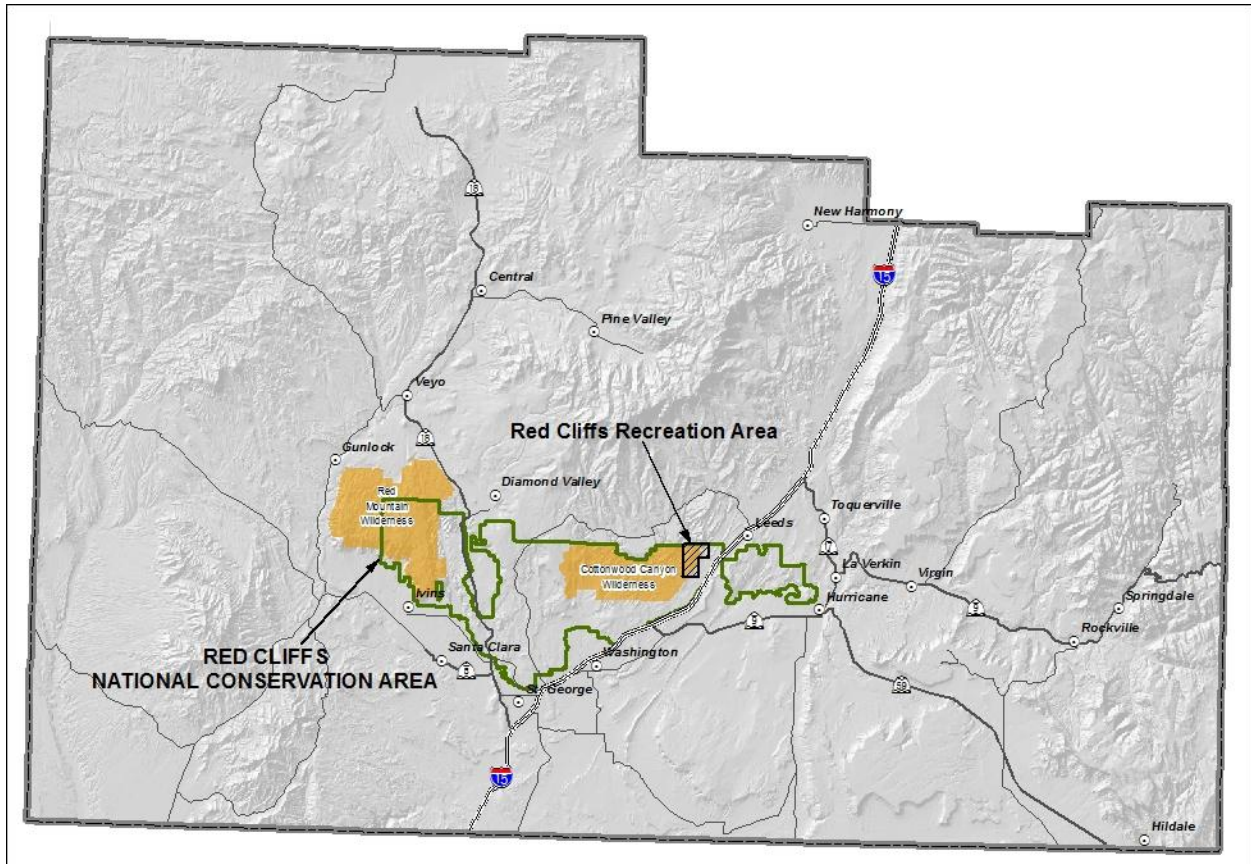
1.2 Background Information

Fees

The campground and day use facilities of the Recreation Area were constructed by BLM in the early 1960s; fee collection for camping use began shortly after the campground was completed. In 1997, a Business Plan was approved for the Recreation Area that authorized the collection of day use fees for the site and established the fee schedule for camping and day use, using a Fair Market Value Calculation Method that compared fees charged at public and private campgrounds in southwest Utah. The camping fee was set at \$8.00 per night (which included the day use fee) and \$2.00 per carload for day use. These fees have remained unchanged over the past 15 years.

Recreation Area Boundary

The Recreation Area boundary was also defined by BLM in the 1960s to include popular hiking and motorized vehicle routes, as well as the public lands where the campground and day use areas were to be developed. Its current land base is 1,209 acre, encompassing the Red Cliffs campground, day use area, and approximately 888 acres of the Cottonwood Canyon Wilderness, designated by Congress in 2009 through the *Omnibus Public Land Management Act of 2009* (P.L.111-11) (Map 1). *The Omnibus Public Lands Management Act* also designated the 45,000 acre Red Cliffs NCA to conserve, protect, and enhance ...the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the public lands (refer to Map 1).



Map 1. Red Cliffs NCA, Recreation Area, and associated Wilderness, Washington County, Utah

The Red Cliffs NCA includes the Recreation Area, all of the 11,700 acre Cottonwood Canyon Wilderness, approximately 50% of the 18,700 acre Red Mountain Wilderness, and more than 100 miles of non-motorized recreation trails for hiking, mountain biking, and equestrian trail riding. The Red Cliffs NCA also comprises 70% of the multi-jurisdictional Red Cliffs Desert Reserve (Reserve). Protective management of the Reserve serves as Washington County’s primary mitigation for its multi-species Habitat Conservation Plan and Incidental Take Permit, issued under the Endangered Species Act. Washington County provides assistance to BLM for law enforcement in the Red Cliffs NCA, as part of its overarching responsibilities to protect the threatened Mojave desert tortoise and other listed species in the Reserve.

1.3 Legal Authorities

Legal authorities that pertain to the management of public lands and, in particular, the collection of recreation fees by BLM include the following:

The Federal Land Policy and Management Act (FLPMA), 1976, established BLM's general management authority over the public lands and land uses, including outdoor recreation as one of the principal uses of those lands. Section 302 (b) of FLPMA directed the Secretary of the Interior to regulate the use of the public lands through permits or other instruments. Section 303 of FLPMA contains BLM's authority to enforce regulations and impose penalties. The initial legal authority for the collection of fees for recreational use of public land was derived from FLPMA.

The Federal Lands Recreation Enhancement Act (16 U.S.C 6802 FLREA), 2004, replaced Fee Demo and FLPMA as BLM's primary legal authorities relating to the collection of recreation fees. This legislation authorizes BLM to collect recreation fees at sites that meet certain requirements. Fee revenues are legally authorized to be retained at the local BLM office where they were collected and must be managed and expended according to specific FLREA criteria for direct operating or capital costs associated with the Recreation and Visitor Services program, including facility repair, maintenance, enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, and law enforcement. FLREA also established the America the Beautiful –National Parks and Federal Recreational Pass Program.

Under FLREA, an Expanded Amenity Fee, as defined at 16 U.S.C 6802 (g) (2) is the category which covers developed campgrounds, such as that at Red Cliffs Recreation Area. As this facility was in place when FLREA was passed in 2004, the campground was "grandfathered" as a fee site, as provided for by 16 U.S.C 6802 (a).

As defined at 16 U.S.C 6802 (f), a Standard Amenity Fee may be charged for day use sites and within National Conservation Areas. The day use site must be a developed day-use area that provides significant opportunities for outdoor recreation and has substantial Federal investments, where fees can be efficiently collected, and contain all of the following six amenities:

- Designated developed parking;
- Permanent toilet facility;
- Permanent trash receptacle;
- Interpretive sign, exhibit, or kiosk;
- Picnic tables; and
- Security services.

The FLREA guidelines require that fee sites have a business plan in place that:

- *Informs the public about the objectives for use of collected recreation fee revenues;*
- *Provides an opportunity for public comment on those objectives;*
- *Assists BLM to determine the appropriateness and level of fees, costs of administering fee programs, and provides a structured communication and marketing plan;*
- *Serves as official documentation in the event of an audit.*

1.4 Agency Policies and Guidance

This 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*

The BLM strives to manage recreation and visitor services in order to serve the diverse outdoor recreation demands of the visitor 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 public 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.*

Section 2 – Recreation Area Description

2.1 Location

The Recreation Area is located approximately 15 miles north of St. George, Utah, and south of the Town of Leeds (Map 1). Access to the Recreation Area is from Interstate I-15 at exits 22 or 23. Visitors must then travel a paved frontage road, “Old” Highway 91, southwesterly for 2 or 3.5 miles depending on the highway exit taken. Access to the Recreation Area continues by turning northwest and proceeding under two height and width restricted highway culverts. A paved access road (Photo 1) continues for another 1.5 miles to the campground and day use areas.



Photo 1. Red Cliffs Road leading to Recreation Area

The Recreation Area is located near a number of state parks and privately-operated recreation facilities. Quail Creek Reservoir State Park is 2.5 miles to the south; the Harrisburg RV Resort is located at the junction of Highway 91 and the Recreation Area access road; the Leeds RV Park is 3.5 miles to the northeast; the Quail Resort RV Park 8 miles to the southeast; and Snow Canyon State Park is 13 miles to the west. Fee data from these facilities are used for comparative purposes in the analysis related to BLM’s proposed fee increases for the Recreation Area.

2.2. Environmental Setting

The Red Cliffs NCA and the Recreation Area are located at the northern perimeter of the St. George Basin, a topographic depression between the Basin and Range Physiographic Province and the Colorado Plateau Physiographic Province. Three distinctive eco-regions, the Mojave Desert, the Great Basin Desert, and the Colorado Plateau, also converge here, resulting in vegetation communities from each eco-region being represented in the Red Cliffs NCA.

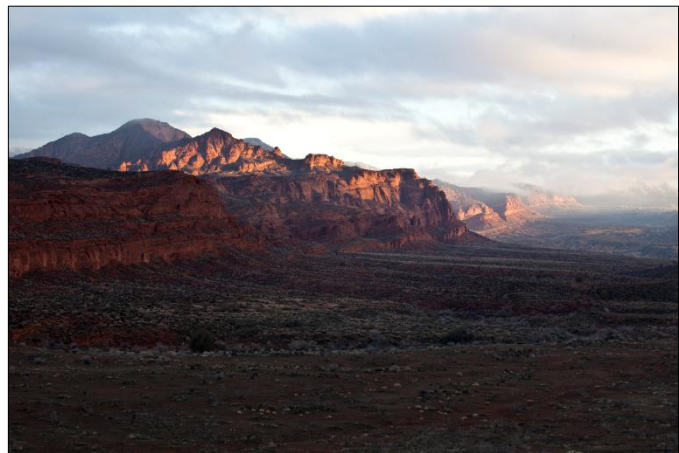


Photo 2. Scenic backdrop of the Recreation Area

Massive red-orange cliffs of Navajo Formation sandstone dominate the rugged and colorful landscape of the Cottonwood Canyon Wilderness and form a scenic backdrop to the Recreation Area (Photo 2). The campground and day use areas are located along the banks of Quail Creek, nestled in a lush riparian area that is dominated by a dense stand of mature cottonwoods and native willows.

2.3 Amenities

The Recreation Area has numerous amenities, including facilities and services. Table 1 lists these amenities. The day use area is comprised of designated paved parking, picnic tables, garbage receptacles, fire pits, barbeque grills, a potable water spigot, and regulatory signing. In the campground, there are 12 campsites that contain designated paved parking, fire pits, barbeque grills, shade shelters, picnic tables, and potable water available from seven centralized water spigots. Two vault toilets serve the day use area and campsites, in a centralized location. Both the day use area and the campsites offer accessible facilities that comply with the Americans with Disabilities Act (ADA) specifications. Several non-motorized trails can be accessed directly from the Recreation Area. Photo 3 illustrates some of the provided amenities.

Table 1: Recreation Area Amenities

Facilities							
Information Kiosks	Interpretive Stations	Shade Shelters	Vault Toilets	Campsites	Day Use Area	Garbage Dumpsters	Non-Motorized Trails
✓	✓	✓	✓	✓	✓	✓	✓

Services							
Law Enforcement	Park Ranger	Toilet Janitorial	Toilet Pumping	Potable Water	Waste Disposal	Maintenance	Information Brochures
✓	✓	✓	✓	✓	✓	✓	✓

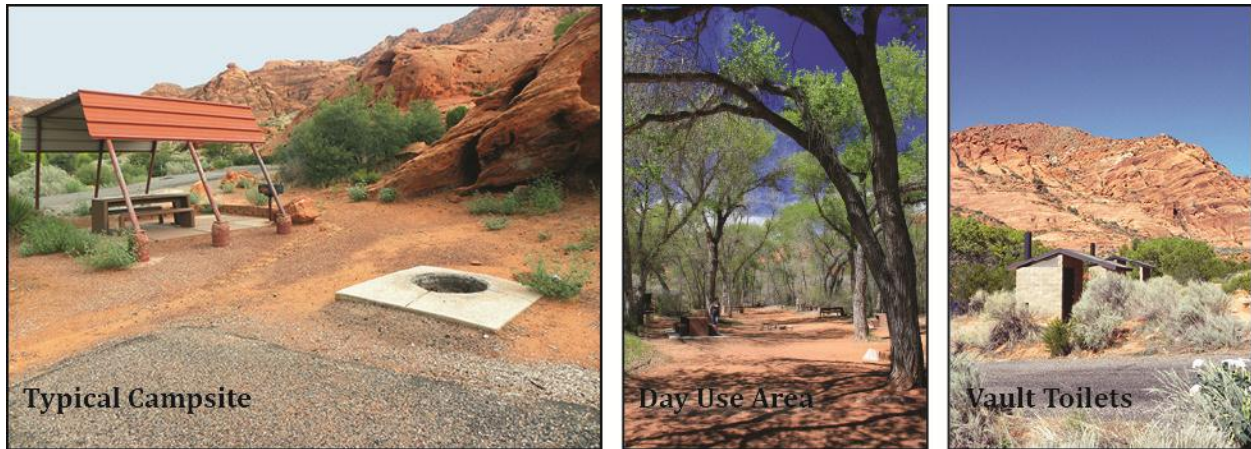
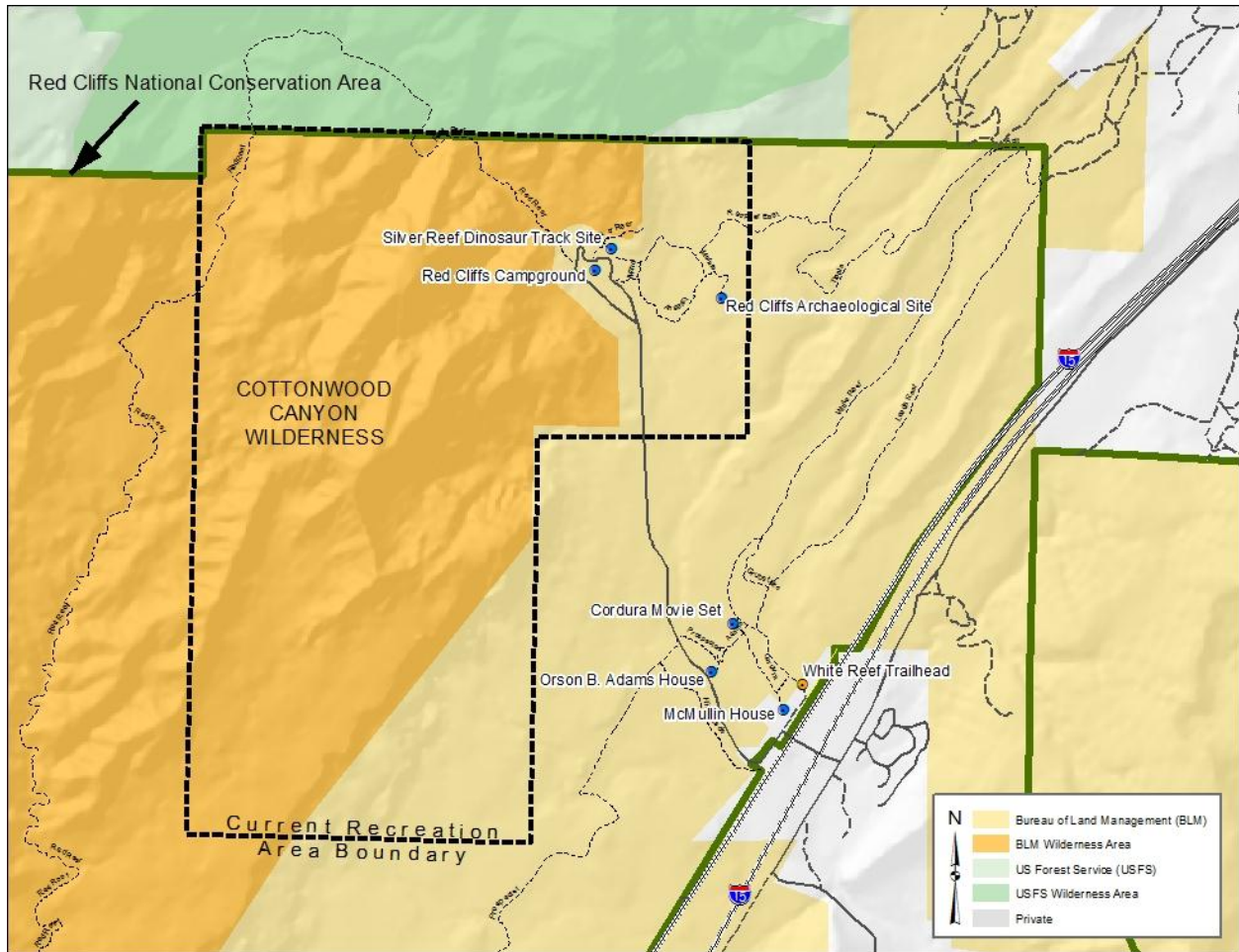


Photo 3. Recreation Area Amenities

Within the Recreation Area are several points of interest (Map 2). Two of these are heritage sites: the Silver Reef Dinosaur Track Site and the Red Cliffs Archaeological Site. The Dinosaur Track Site can be reached from the campground by a short hike. Visitors can view numerous Jurassic Period (190 million years ago) three-toed dinosaur tracks and interpretation panels are available at the on-site. The Red Cliffs Archaeological Site is an excavated, stabilized, and interpreted Ancestral Puebloan farmstead. Visitors can see the stabilized foundations of corn storage structures that were used by these prehistoric farmers between approximately 500 A.D. and 1150 A.D. Interpretive panels on-site explain the Ancestral Puebloan lifeways, show examples of the artifacts recovered from the site by the archeological excavations conducted during the late 1980s. Photo 4 illustrates some of the features at these points of interest.



Map 2 Current Recreation Area Boundary and Points of Interest



Photo 4. Features at Points of Interest

The Recreation Area also serves as a trailhead for the extremely popular Red Reef Trail. This trail leads visitors into the Cottonwood Canyon Wilderness, where visitors enjoy hiking in the slot canyon and climbing the red sandstone cliffs, just a short distance from the campground.

2.4 Visitation

Visitation to the Recreation Area has steadily increased during four of the past five years as shown in Table 2. The decline in visitation recorded in 2010 was due to a three-month closure of the Recreation Area, while the access road was repaved and other repairs were made to the facilities. The visitation data are derived from the number of Recreation Use Permits issued for this site by BLM (Table 3)¹. Visitors averaged approximately 28,615 annually over the past 5 years: 24,675 day use visitors and 3,940 overnight camping visitors.

Table 2: Recreation Area Visitors

Month	Year				
	2012	2011	2010	2009	2008
Day Use Visitors	32,811	31,770	20,616	20,170	18,013
Overnight Visitors	5,055	4,116	3,152	4,190	3,186
Total	37,866	35,886	23,768	24,360	21,199
% Increase	5.5%	51%	-2.4%	14.9%	---

Source: BLM RMIS Database

Table 3: Recreation Use Permits (RUPs)

Month	Year				
	2012	2011	2010	2009	2008
Day Use RUPs	9707	9,395	7,021	6,271	5,778
Camping RUPs	1289	1,119	1,077	1,126	855
Total	10,996	10,514	8,098	7,397	6,633
% Increase	4.6%	29.8%	9.5%	11.5%	---

Source: BLM RMIS Database

Typically visitation is higher in Spring and Fall, due to the nature of the desert climate: extremely hot summers and cold winters. Another factor affecting visitation is the seasonal flow of water. Water is a significant attractant for local visitors who come to the Recreation Area in the Spring and early Summer to enjoy Quail Creek. See Table 4 for the monthly visitation for 2012 that shows this seasonal fluctuation.

Table 4: Seasonal Visitation

Month	Year 2012											
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Visitors	2,951	2,060	1,109	1,434	2,472	3,081	7,409	5,360	5,915	1,924	1,952	2,199

Source: BLM RMIS Database

¹ This data is based on a self-pay system (as described in 3.2). Along with their recreation use permit fee, visitors are asked to record the size of their party and other pertinent data. This information is not always provided. And as there is no entrance station and compliance checks by staff and Law Enforcement Rangers is sporadic, antidotal evidence suggests that visitation is higher than shown. BLM staff are experimenting with traffic counting devices to better estimate or confirm recreation use permit numbers for more accurate visitation data.

2.5 The Visitor

There are two distinct types of visitors who come to the Recreation Area: day users and overnight campers. Day users are the predominant user group at the Recreation Area and they are primarily Washington County residents. In the spring, the most popular activity for families and groups is to hike the Red Reef Trail (Photo 5), and access the sandstone cliffs in Cottonwood Canyon Wilderness, north of the campground. Another popular activity is wading or even swimming, in the small pools seasonally fed by Quail Creek. Picnicking in the day use area is very popular with groups of all sizes, as well as visits to the Silver Reef Dinosaur Track Site and the Red Cliffs Archaeological Site.

Overnight users are typically from out of town and are an equal mix of those who camp in small recreational vehicles and tent campers. The size of recreational vehicles is limited by the height and width restricted access route. And without electrical and water hookups, running water, showers, and other similar amenities, these visitors are accepting of (and some seeking) a more undeveloped facility experience.

As part of the self-pay permitting process, the only demographic information available comes from the fee envelope that lists the state where each visitor's vehicle is registered. These data show that the majority of overnight campers are from other western states in the region and most day-users are local residents. Despite a lack of specific demographic data, national trends indicate the average overnight campground visitor is likely to be in a moderate income bracket. This information is reflected at local campgrounds where observations show overnight visitors to be an equal mix of recreational vehicles and tent campers.



Photo 5. Red Reef Trail Water Feature

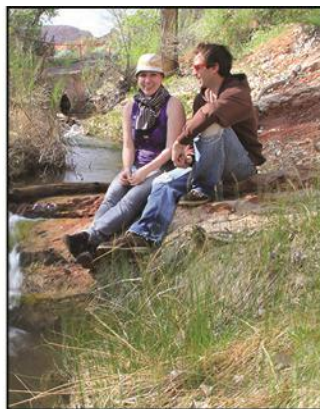


Photo 6. Overnight Camping and Day Use Visitors

The public lands within the current boundaries of the Recreation Area preserve a number of prehistoric period archeological sites. These lands are also within the traditional homelands of the Southern Paiute people who occupied southern Utah at the time of Anglo-European settlement in the 19th century. The Southern Paiute have not identified sacred or traditional cultural properties within the Recreation Area for which they require access, under the authority of Executive Order 13007. Should such sites be identified in the future, the St. George Field Office will, to the extent practicable, permitted by law, and consistent with essential agency functions, accommodate access to and ceremonial use of the sites by Indian religious practitioners.

Section 3 – Recreation Area Operations

3.1 Operating Schedule

The Recreation Area operates on a year-round schedule and visitors may use the facilities daily throughout the year. Because of the mild winter temperatures, potable water is always available. The day use area hours are from 7 a.m. (end of quiet time) to Sunset.

3.2 Fee Collection and Revenues

Campsites and day use areas are available year-round on a “first come, first served” basis. Recreation Use Permit fees (fees) are collected onsite, through two Pay Stations (Photo 7), consisting of a self-pay “iron ranger” system and payment information. BLM recreation staff and Law Enforcement Rangers conduct daily patrols to verify that all visitors are in compliance with fee payment requirements.

The Dixie/Arizona Strip Interpretive Association (D/ASIA), a not-for-profit association, assists with fee collection operations at the Recreation Area, through a Grant and Cooperative Agreement with SGFO. Two D/ASIA employees are compensated to retrieve the fees from the self-pay “iron rangers”, tally the fees and visitor numbers, and prepare the fees for deposit.



Photo 7. Pay Station with Iron Ranger

Recreation Area fees are deposited in a fee account; funds from this account are used to pay for certain operation costs for the Recreation Area. Any balances remaining in this fee account at the end of the fiscal year (October 1 - September 30) “carry over” into the next year, rather than being returned to the U.S. Treasury. Table 5 displays revenues collected in the fee account for the Recreation Area during the past six fiscal years.

Table 5: Recreation Area Fee Revenues

Fiscal Year	2012	2011	2010	2009	2008	2007
Revenues	\$32,620	\$32,116	\$26,094	\$24,877	\$21,307	\$19,500
% Increase	1.6%	23%	4.8%	16.7%	9.2%	---

Source: BLM RMIS Database

3.3 Operating Costs

The total average operating cost, as shown in Table 6, includes staff labor; contractual services; and equipment, materials, and supplies (E/M/S). The details of these costs are described in the following breakdowns for each category.

Table 6: Total Average Annual Operating Costs

Fiscal Year 2012			
Staff Labor Table 7	Contractual Services Table 8	E/M/S Table 9	Total Cost
\$83,580	\$18,900	\$21,300	\$123,780
68%	15%	17%	100%

Staff Labor

Salaries for BLM staff engaged in the operation of the Recreation Area are funded through Congressionally-appropriated funds to BLM, not by fee revenues. Table 7 lists the staff involved in operating the Recreation Area and their average costs calculated over the last two fiscal years. Although not shown in the calculations below, the Washington County Sheriff routinely patrols and is dispatched to the Recreation Area, with these costs funded by the county as part of its responsibilities related to the protective management of the Red Cliffs Desert Reserve.

Table 7: Average Annual Staffing Costs

Fiscal Year 2012		
Position	Appropriations	
	Workdays Per Year	Cost
Red Cliffs NCA Manager	12	\$6,800
Outdoor Recreation Planner (2)	30	\$12,300
Landscape Architect	12	\$5,040
Administrative Assistant	8	\$1,800
Maintenance Crew Foreman	9	\$3,800
Maintenance Crew (3)	9	\$10,500
Law Enforcement Ranger	22	\$10,700
Park Ranger (Rec. Tech)	105	\$28,800
Recreation Intern (2)	12	\$1,920
Interpretative Intern	24	\$1,920
Totals	243	\$83,580

Contractual Services

Contracted services are used for the daily/weekly/monthly cleaning and regular pumping of the two vault toilets and for a small number of other specialized services such as an arborist, electrician, and garbage collection. Fee revenues are also used to compensate D/ASIA employees for providing fee collection assistance as described in 3.2. Table 8 lists the contractual services used to operate the Recreation Area and their average costs calculated over the last two fiscal years (contracts were initiated two years ago).

Table 8: Average Annual Contractual Costs

Fiscal Year 2012		
Service	Fee Revenue	Appropriations
Janitorial Services	\$10,600	\$0
Toilet Pumping Services	\$4,000	\$0
D/ASIA Fee Collection Staff	\$1,300	\$0
Miscellaneous Professionals	\$0	\$3,000
Totals	\$15,900	\$3,000

Equipment, Materials, Supplies (E/M/S)

Table 9 lists the costs of the E/M/S needed to maintain and improve the Recreation Area. The costs shown in Table 8 are averages from the last four fiscal years, except for deferred maintenance and capital improvement (DM/CI) projects, which were averaged over a 5 year period. Since 2008 a number of DM/CI projects (a combination of deferred maintenance and new construction) have been completed: replacement of all traffic control signs, replacement of damaged picnic tables, installation of Pay Stations, major repair on stairways, installation of interpretative signs at the points of interest, and printing of visitor guides (brochures) for a total of approximately \$30,000. All of the E/M/S associated with these DM/CI projects were funded by Congressionally-appropriated funds to BLM.

Table 9: Average Annual Equipment, Materials, and Supplies Costs

Expenditure	Fee Revenue	Appropriations
Equipment/Materials/Supplies	\$15,300	\$0
DM/CI Projects	\$0	\$6,000
Totals	\$15,300	\$6,000

Other Services

Additional services required to operate the Recreation Area include waste disposal associated with the garbage dumpsters, purchase of culinary water from the City of Hurricane, and provision of a telephone line. These costs are funded by Congressionally-appropriated funds and are not quantified in this Business Plan. Other costs of administering the Recreation Area that are not quantified here include overhead: office space; information services; fleet operations; and managerial, engineering, administrative, and budget support.

3.4 Estimated Future Operating Costs

Table 10 provides an estimate of the total average annual operating costs for the next three years. Increases are based on the average increase of the Consumer Price Index over the last 3 years (2009-2011) of 2.4%. Assumptions to operating costs based on the proposed boundary adjustment include: no increase in staff labor, an increase in contractual services for the additional amenities (as discussed in 5.4), and an increase of E/M/S of \$2,000.

Table 10: Future Total Average Annual Operating Costs

FY	Without Boundary Adjustment			Total Costs	With Boundary Adjustment			Total Cost
	Staff Labor	Contractual Services	E/M/S		Staff Labor	Contractual Services	E/M/S	
2012	\$83,580	\$18,900	\$21,300	\$123,780	\$83,580	\$21,433	\$23,300	\$128,313
2013	\$84,866	\$19,354	\$21,811	\$126,031	\$84,866	\$21,947	\$23,859	\$106,813
2014	\$86,903	\$19,818	\$22,334	\$129,055	\$86,903	\$22,474	\$24,432	\$109,377
2015	\$88,989	\$20,294	\$22,870	\$132,153	\$88,989	\$23,013	\$25,018	\$112,002

3.5 Fee Revenue Expenditures

Currently only contractual services and equipment, materials, and supplies are funded by fee revenues. Table 11 illustrates the annual difference between revenues and expenditures, showing an average net loss of \$2,277 over a four year period. It also indicates the amount of funding available for allocation while

still maintaining a one year reserve¹. However, even if the average annual appropriations expenditures were to be funded by fees, the fee account would sustain a negative balance.

Table 11: Annual Fee Account Expenditures

FY	Fee Revenue	Fee Account Expenditures	Difference Between Revenue & Expenditures	Fee Account Balance	Surplus Funds²	Average Annual Appropriations	Difference Including Average Appropriations
2012	\$32,620	\$25,693	\$6,927	\$43,865	\$12,662	\$92,580	(\$48,715)
2011	\$32,116	\$34,000	(\$1,884)	\$36,938	\$3,138		
2010	\$26,094	\$42,720	(\$16,626)	\$33,800	\$2,597		
2009	\$24,877	\$22,400	\$2,477	\$48,912	\$17,709		
2008	---	---	---	\$46,435	\$15,232		
Average	\$28,927	\$31,203	(\$2,277)	\$41,990	\$10,268		

¹ Currently the Fee Account is managed to maintain a one year reserve based on a four year average of expenditures.

² Surplus Funds are those above the one year reserve that could be used to support additional operating costs.

Section 4 - Proposed Fees

4.1 Introduction

The goal of a fee increase would be to cover 100% of the average annual operating costs of contractual services, E/M/S, and maintain a one year average balance in fee revenue reserves. An additional goal would be to provide revenue for some DM/CI and other projects that would benefit visitors.

Fees have been at their current levels since 1997. In 1997, the average annual Consumer Price Index (CPI) was at 160.5; by 2011 it had climbed to 224.9. Using the CPI, costs have increased by 34.2% since 1997, while fees collected for day use and overnight camping remained unchanged. Average annual fee revenues (see Table 11) currently cover approximately 23% of the total average annual operating costs (see Table 6) of the Recreation Area, excluding other costs as identified in 3.2 Other Costs. However, average annual fee revenues currently cover approximately 77% of the average annual operating costs of contractual services and E/M/S.

4.2 Analysis of Current Fees

Two methods were used to assess the adequacy of current fees: Fair Market Value¹ (FMV) and Cost Recovery² (CR). The FMV method was used to see what visitors to the area are willing to pay for similar amenities as the Recreation Area. The CR method was used to determine how much visitors would have to pay to fully cover the average annual operating costs for contractual services and E/M/S, maintain a one year average balance in fee revenue reserves, and provide a small surplus for DM/CI and other projects.

Fair Market Value

When the fee schedule was set up for the Recreation Area, fees in the market area for sites with similar settings and services were examined to determine the fair market value for day use and overnight camping. Those same recreation sites, as well as new additions to the area, were examined as part of this Business Plan. Table 11 displays the recreation sites assessed and the fees charged; sites are a mix of private, state and federal government sites. An assessment of the fees was made to determine what level of fee increase would be appropriate for the Recreation Area. The purpose of this assessment was to determine a fair market value for the Recreation Area that provided the greatest cost recovery possible, without creating unfair federal competition or over charging visitors.

The majority of recreation sites most similar to the Recreation Area (marked with an * in Table 12) charge different fees for tent camping and RV sites, and these range from \$12 to \$16. At the Recreation Area, services for both tent and RVs are the same and consequently should be charged an equal fee. This range of fees also shows that the Recreation Area, at \$8, is below the market rate for camping. When comparing tent fees at the other recreation sites that have more amenities than the Recreation Area (such as the availability of showers, flush toilets, etc.), fees range from \$13 to \$36. This indicates that the Recreation Area should stay at the lower end of the market, since these amenities are not available.

¹ Fair Market Value is the price for a good, resource, or service that is based on competition in open markets that creates neither a shortage nor a surplus of the good, resource, or service.

² Cost Recovery is the price of a good, resource, or service that is based on recovering the full cost to produce that good, resource, or service.

Of those recreation sites that have day use fees, all are comparable in terms of offering recreational activities and basic amenities to support day use (restrooms, trails, water feature, picnic area, etc.). Fees range from \$7 to \$10. This indicates that the Recreation Area, at \$2, is below the going market rate for day use.

Table 12: Comparison of Developed Recreation Sites and Fees in Washington County

Recreation Site	Public/Private	Campsites	Group Campsites	RV/Tent Sites	RV Hookups	Day Use Fee	Tent Fee	RV Fee
<i>Red Cliffs</i>	<i>BLM</i>	<i>12</i>	<i>No</i>	<i>RV/Tent</i>	<i>No</i>	<i>\$2</i>	<i>\$8</i>	<i>\$8</i>
Gunlock State Park*	State	6	No	RV/Tent	No	\$7	\$13	\$13
Snow Canyon State Park	State	34	Yes	RV/Tent	Yes	\$6	\$16	\$20
Sand Hollow State Park	State	50	No	RV/Tent	Yes	\$10	\$13	\$25
Quail State Park*	State	23	No	RV/Tent	No	\$10	\$15	\$15
Dixie NF Blue Springs*	USFS	17	Yes	RV/Tent	No	N/A	\$12	\$12
Dixie NF South Juniper*	USFS	7	Yes	RV/Tent	No	N/A	\$12	\$12
Dixie NF North Juniper*	USFS	11	Yes	RV/Tent	No	N/A	\$12	\$12
Dixie NF Pines*	USFS	13	No	RV/Tent	No	N/A	\$12	\$12
Zion NP South*	NPS	180	No	RV/Tent	No	N/A	\$16	\$16
Zion NP Watchman*	NPS	170	No	RV/Tent	No	N/A	\$16	\$16
Willowwind RV	Private	165	No	RV/Tent	Yes	N/A	\$20	\$30
Zion West RV Park	Private	36	No	RV	Yes	N/A	\$18	\$30
Temple View RV Resort	Private	260	No	RV/Tent	Yes	N/A	\$30	\$40
Zion River Resort	Private	130	Yes	RV	Yes	N/A	\$36	\$50
Leeds RV	Private	40	No	RV/Tent	Yes	N/A	\$20	\$33
Harrisburg RV	Private	123	No	RV	Yes	N/A	N/A	\$33

Cost Recovery

Currently 68% of the Recreation Area’s operating costs are allocated to staff labor and 32% to contractual services and E/M/S. This analysis looks at only a partial cost recovery. To cover the average annual operating costs for contractual services and E/M/S, and maintain a one year average balance in fee revenue reserves, fee revenues would need to increase each year as shown in Table 13, in column Estimated Revenues Needed. Table 13 also shows the estimated revenues without the proposed fee increase and the surplus or shortfall created. Under this scenario, a consistent shortfall develops each year without lowering the average annual operating costs. If a full cost recovery analysis was done including staff labor or even a percentage of those costs, the deficit would be greater.

To cover the average annual operating costs for contractual services and E/M/S, and maintain a one year average balance in fee revenue reserves, including additional amenities (as described in Section 5 Proposed Boundary Adjustment), fee revenues would need to increase each year as shown in Table 14, in column Estimated Revenues Needed. Table 14 also shows the estimated revenues with the proposed fee increase based on FMV and the surplus or shortfall created. Under this scenario, a consistent small surplus develops each year. If a full cost recovery analysis was done including staff labor, currently at \$83,580 for fiscal year 2012, the surplus would be eliminated.

Table 13: Estimated Fee Revenues for Partial Cost Recovery

Fiscal Year	Contractual Services	E/M/S	Total Cost	Current Fee Account Balance	Estimated Revenues Needed	Estimated Revenues without Increase ¹	Surplus/ Shortfall
2013	\$19,354	\$21,811	\$41,165	\$43,865	\$44,860	\$30,128	\$-14,732
2014	\$19,818	\$22,334	\$42,152	\$42,160	\$43,873	\$30,532	\$-13,341
2015	\$20,294	\$22,870	\$43,164	\$42,160	\$42,861	\$30,946	\$-11,915
Average	\$19,822	\$22,338	\$42,160	---	---	---	---

Table 14: Estimated Fee Revenues for Partial Cost Recovery with Boundary Adjustment

Fiscal Year	Contractual Services	E/M/S	Total Cost	Current Fee Account Balance	Estimated Revenues Needed	Estimated Revenue With Increase ²	Surplus/ Shortfall
2013	\$21,947	\$23,859	\$45,806	\$43,865	\$44,973	\$68,745	\$23,772
2014	\$22,474	\$24,432	\$46,906	\$46,914	\$46,922	\$69,625	\$22,703
2015	\$23,013	\$25,018	\$48,031	\$46,914	\$45,797	\$70,525	\$24,728
Average	\$22,478	\$24,436	\$46,914	---	---	---	\$23,734

4.3 Proposed Fee Change

After careful consideration of the fee calculation process (as described in 4.2 Analysis of Current Fees), future estimated revenues, and future estimated operating costs, the proposed changes to fees are as follows:

- Increase \$2.00 day use fee per vehicle to **\$5.00**
- Increase \$8.00 overnight camping fee (includes day use) to **\$15.00**

Two Annual Day-Use Passes would also be offered for unlimited day use of the Recreation Area. The proposed fees for these passes would be: \$75 Annual Day Use Pass and \$35 Senior Annual Day Use Pass (ages 62 and over). The Annual Day Use Passes would be available for purchase at the Interagency Center, 345 E. Riverside Drive, St. George, UT. Table 15 compares the proposed fees for the Annual Day Use Passes with the fees charged for Annual Day Use Passes at other recreation sites with similar amenities in Washington County. As this comparison shows, the proposed fees for the two Annual Day-Use Passes that would be available for the Recreation Area reflect a Fair Market Value, given the amenities of the Recreation Area. Fees collected through the sale of the Annual Day Use Passes would remain with the local BLM for use in the maintenance and improvement of facilities in the Recreation Area.

¹ Estimated revenues are based on a growth projection of 2% for overnight camping RUPs. This corresponds to the 2.2% increase seen in 2012 and the fact that overnight use has room to grow in the summer, fall, and winter months. Estimated revenues for day use RUPs are based on a 1% growth projection. In 2012, growth was 3.3%, but day use growth is limited by parking availability. The 1% growth projection is based on the potential for increased visitors in the shoulder seasons and increased parking space turnover during spring. Current RUP fees of \$2.00 for day use and \$8.00 for overnight camping were used.

² Estimated revenues are based on a growth projection of 2% for overnight camping RUPs and 1% for day use RUPs including additional revenue from day users entering at White Reef Trailhead. FMV RUP fees of \$5.00 for day use and \$15.00 for overnight camping were used.

Table 15: Comparison of Annual Day Use Pass Fees for Recreation Sites in Washington County, UT

Recreation Site	Public/Private	Annual Day Use Pass Fee	Annual Senior Pass
Snow Canyon State Park	State	\$75	\$35
Sand Hollow State Park	State	\$75	\$35
Quail Creek Reservoir State Park	State	\$75	\$35

4.4 Public Benefits of Fee Increase

Revenues for Amenity Maintenance

Increased fees will provide revenues to fully cover the contractual services and E/M/S required by the Recreation Area. This will ensure basic health and safety needs are being met and that the quality of the visitor’s recreation experience remains satisfactory, based on the condition of the facilities and the variety of the amenities.

Revenues for Expanded Amenities

Increased fees will provide a small annual surplus that will be used to expand visitor amenities as discussed in 5.5 Increased Interpretative Opportunities, 6.2 Deferred Maintenance and Capital Improvements, and 6.3 Other Projects. This expansion of amenities enhances the diverse and meaningful recreation opportunities that provide outdoor skills, build group and family relationships, and encourage stewardship of local public land resources.

Fair Government Competition

The FMV analysis indicated that the Recreation Area fees were the lowest in Washington County, when compared to all other developed recreation sites managed by federal, state, and even private entities. Increasing fees to be on a par with those that offer similar services and amenities would reduce the potential that BLM is unfairly competing with other recreational providers, by charging lower fees at the Recreation Area.

4.5 Economic Impacts of Fee Increase

Washington County’s economy is diversified and not reliant on any one economic sector to remain viable (Chart 1). The proposed fee increases for the Recreation Area would not likely result in any measurable negative impacts on recreational users on public lands in Washington County.

Maintaining safe, clean facilities in the Recreation Area and high quality visitor services would continue to provide direct and indirect economic benefits to the local economy. Visitors would be satisfied with their experiences and

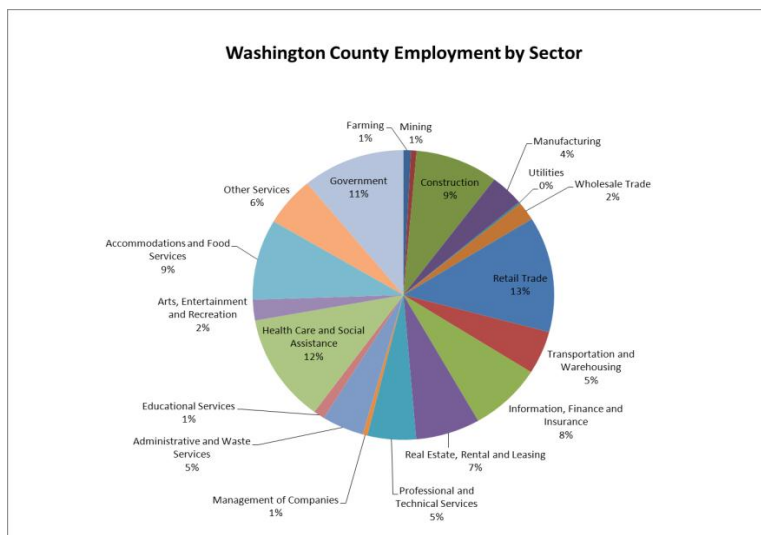


Chart 1. Washington County Employment by Sectors

therefore be more likely to prolong their stays or return on a regular basis. Should facilities and services in the Recreation Area be allowed to deteriorate, visitation could be expected to decline, negatively impacting recreation-derived revenues for the local economy.

Data from studies completed on the economic impact of visitor spending for recreational activities on public lands managed by the St. George Field Office (Yardley 2011, Pinkham 2012) and BLM data indicate that visitor use in RCNCA totaled approximately 129,000 visitors in 2011. Of that total, approximately 37,486 were from outside Washington County and 91,776 were Washington County residents (Chart 2). The direct economic impact of this level of visitor use to the local economy is estimated to be \$6,674,380 (Chart 3).

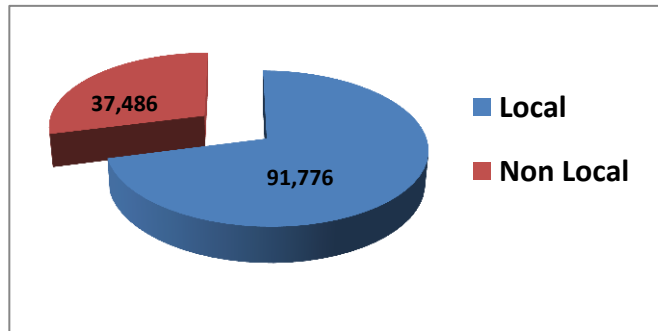


Chart 2. Visitor Use Data for RCNCA 2011

These studies also showed that recreational uses by non-local visitors on public lands in Washington County resulted in \$32.6 million dollars in direct and indirect benefits to the regional economy. It found that visitors were attracted to Washington County because of the *variety* of recreational opportunities that are available for visitors. Maintaining local recreation sites in safe and attractive condition directly contributes to the overall quality of the visitor experience and indirectly to the economic benefits derived from this economic sector.

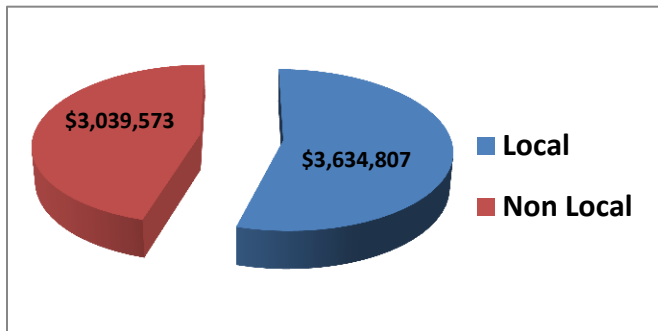


Chart 3. RCNCA Direct Economic Impact 2011

Socioeconomic Impacts to Low-Income Populations

The socioeconomic profiles of visitors specifically to the Recreation Area are unknown at this time. In 2010, the BLM conducted a Visitor Satisfaction Survey for the Red Cliffs NCA. The survey was conducted at multiple locations, including the Recreation Area. Data collected showed that local visitors to the Red Cliffs NCA are nearly equal in number to those who have traveled from outside the area. The Recreation Area offers a very low-cost alternative to visitors from outside the area, when compared to staying in local motels and hotels (where prices range from \$40 to over \$100 per room per night), particularly for large groups that can take advantage of the group use camping and day use site in the Recreation Area.

Based on U.S. Census data (2010), approximately 11% of residents in Washington County have annual household incomes that place them in low income

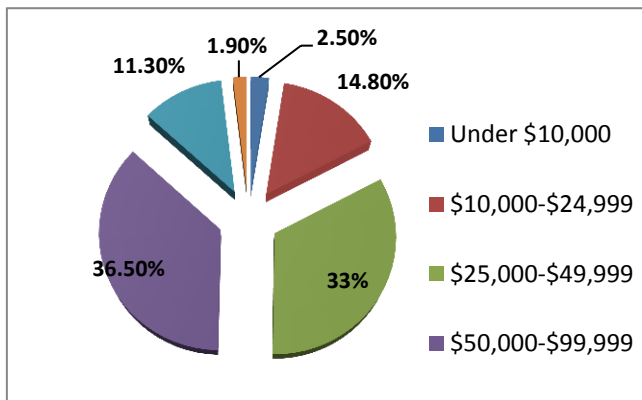


Chart 4. Annual Household Income of Residents in Washington County

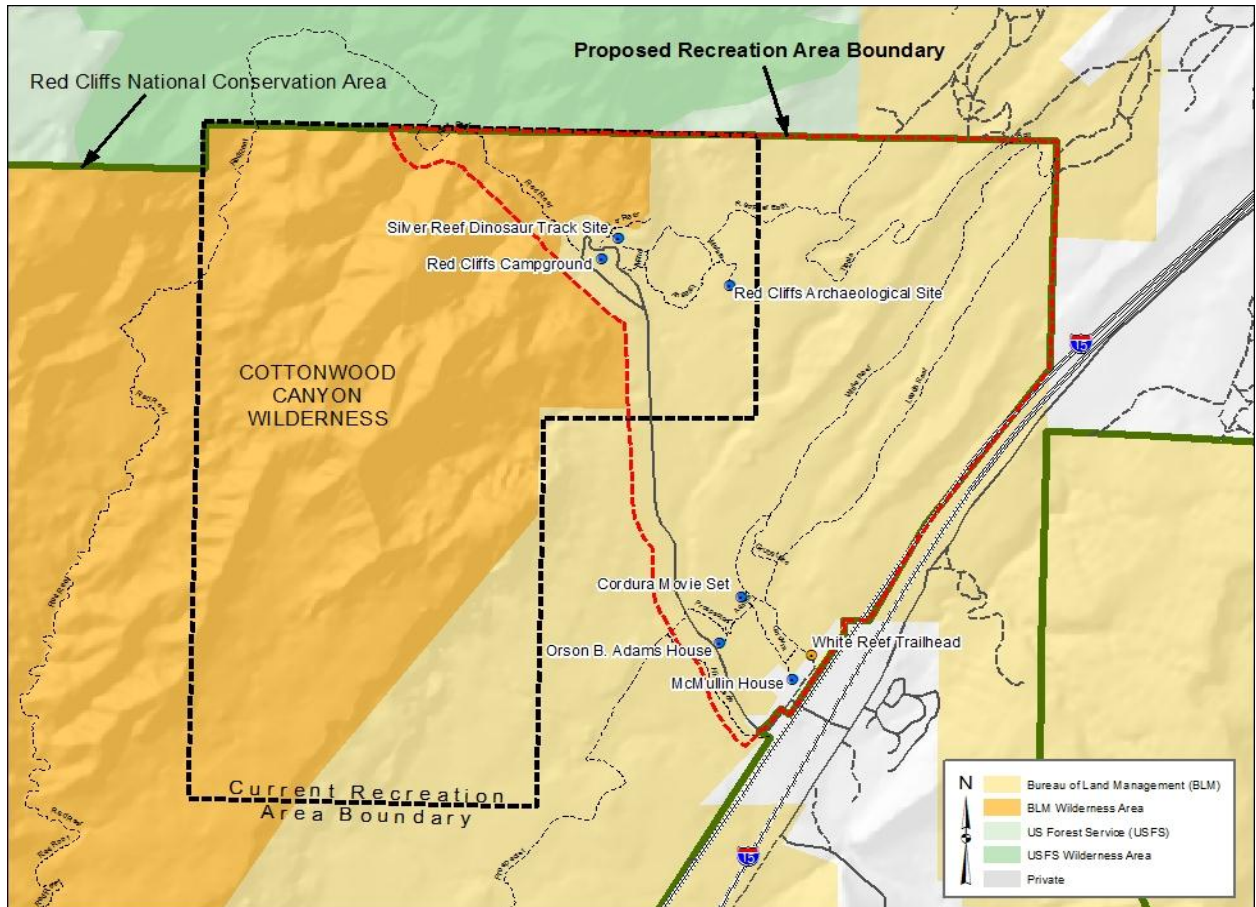
categories. This percentage is lower than the state average of 14% and substantially lower than the national average of 15%. As shown in Chart 4, household incomes in Washington County are well above poverty and low income level. Based on these data, the proposed Recreation Area fee increases would have little or no effect on the small percentage of low income residents of Washington County. Very low income is defined as 50 percent of the median family income for the area. Low income is defined as 80 percent of the median family income for the area. Washington County median household income average for 2007-2011 was \$50,300.
Source: U.S. Census Bureau

Section 5 - Proposed Boundary Adjustment

5.1 Introduction

The current boundaries of the Recreation Area were established in the 1960s and do not reflect legislative changes and land acquisitions that have occurred since that time. Adjustments to the Recreation Area boundary would improve the manageability of the Recreation Area and add additional visitor amenities. Map 3 illustrates the current Recreation Area boundary, which encompasses approximately 1,200 acres, as well as the proposed Recreation Area boundary, which would reduce the acreage to approximately 870 acres, but add other visitor amenities and points of interest. Adjustment of the boundary would also allow BLM to collect standard amenity fees for use of the additional trails and amenities and offer Annual Day-Use Passes for these same facilities. If the proposed boundary adjustment is approved, BLM would publish a Notice in the *Federal Register* relating to the establishment of a new Fee Site and not implement the proposed collection of standard amenities for use of the trails and amenities of the White Reef Park area until the mandatory six month waiting period had elapsed.

As the proposed boundary adjustment would result in changes to the management of the public lands with regard to the collection of fees, Appendix A includes the EA and Finding of No Significant Impact that was prepared to analyze the potential environmental consequences of BLM's authorization of this boundary adjustment. A public review and comment period for the EA will run concurrently with the public comment period for the draft Business Plan. Following that review and comment period, any needed changes to the EA will be made and a Decision Record signed, approving either the proposed boundary change or the No Action alternative, wherein no changes would be made to the Recreation Area boundaries.



Map 3. Proposed Recreation Area Boundary

5.2 Legislative Changes

The Recreation Area currently encompasses 888 acres of the Cottonwood Canyon Wilderness, designated by Congress in 2009. Developed recreation facilities or amenities cannot be constructed in designated wilderness areas, as this area must be managed to protect its natural character. Adjusting the boundary of the Recreation Area to exclude a majority of the wilderness acres would be consistent with the intent of managing the public lands within the Recreation Area for developed recreation.

5.3 Land Acquisitions

The proposed Recreation Area boundary adjustment would add approximately 215 acres of land that was acquired into federal ownership in 2001 from willing private sellers. The acquired land includes short reaches of Quail and Leeds Creeks and a number of historic ditches, rock walls, fields, and historic wagon roads that were once part of the now abandoned 19th century Mormon agricultural settlement at Harrisburg. Also situated on this parcel are the 1860's era Orson B. Adams house (Photo 9) and the remains of the Willard McMullin house, also associated with historic Harrisburg. The Orson B. Adams house was restored by BLM in 2005 and it is now available for public visitation through a volunteer docent program. Information about the history of Harrisburg, the Adams house and the families that lived in the house is provided on-site, through interpretive panels.

In the 1950s, the opening scenes of a major Hollywood motion picture, *They Came to Cordura*, starring Gary Cooper and Rita Hayworth, was filmed within the landscape of historic Harrisburg that was acquired by BLM in 2001. The ruins of the movie set are still in place along the northern bank of Quail Creek (Photo 8). Protective fencing and interpretative panels have been installed by BLM at the Cordura Movie Set. Both the movie set and the Orson B. Adams House are linked to a larger trail system in the Red Cliffs NCA, through recently constructed designated non-motorized trails.

In 2009, BLM prepared a management plan for recreational use of the acquired lands and adjacent public lands. The area was called the "White Reef Park" and the plan addressed management of the area for non-motorized recreation and interpretation of its points of interest, through a designated trail system. Use of the trails was to be supported by a new trailhead and other amenities that BLM would construct. The environmental impacts associated with recreation management in the White Reef Park and the construction of new trails and facilities were addressed in an EA (UT100-08-EA-12).

The White Reef Park plan was implemented in 2010, with the 5 acre White Reef Trailhead, picnic shelter, and trail system being completed. This trailhead provides visitor access to the designated non-motorized trail system in the White Reef area, which in turn links to other trails both inside and outside the Red Cliffs NCA. The trailhead also provides access to the Orson B. Adams House, the Cordura Movie Set, and the McMullin House, owned by Washington County. The McMullin House has been an extremely popular location for wedding and other special occasion photographs, with the standing rock walls serving as a scenic backdrop. Map 3 shows the location of these points of interest within the proposed Recreation Boundary.

5.4 Additional Visitor Amenities

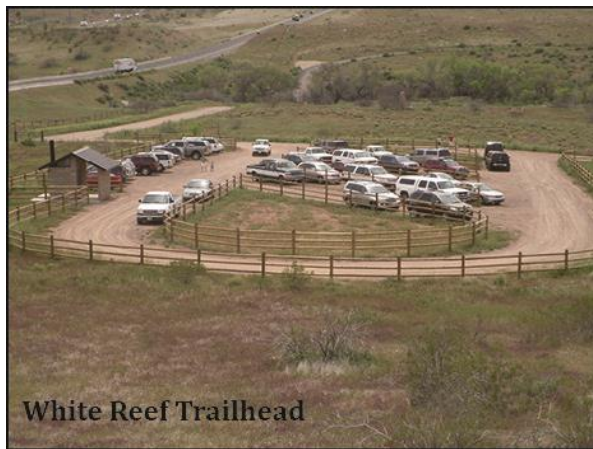
The proposed boundary adjustment would add the White Reef Park, with its visitor amenities of the White Reef Trailhead, trail system, and historic points of interest to the Recreation Area (Table 15). The authorized recreational uses of these public lands would be compatible with those of the Recreation Area and the land base and existing amenities would augment the capacity and diversity of facilities in the Recreation Area. The White Reef Trailhead consists of designated parking for 18 vehicles and 4 pull-thru stalls for oversized vehicles (equestrian trailers and RVs). It also includes a vault toilet, an information kiosk, and a shade shelter with picnic table. Also included are three designated vehicle parking spaces (2 ADA accessible) at the Orson B. Adams House and interpretive stations at both the Orson B. Adams

House and the Cordura Movie Set. Photo 10 illustrates some the additional visitor amenities that would be added to the Recreation Area by the proposed boundary adjustment.

Table 16: Additional Amenities in Proposed Recreation Area Boundary

Facilities					
Information Kiosk	Interpretive Stations	Shade Shelter	Vault Toilet	Parking (equestrian facilities)	Non-Motorized Trails
✓	✓	✓	✓	✓	✓

Services					
Law Enforcement	Park Ranger	Toilet Janitorial	Toilet Pumping	Maintenance	Information Brochures
✓	✓	✓	✓	✓	✓



White Reef Trailhead



Interpretation



Information Kiosk

Photo 9. Additional Visitor Amenities

5.5 Public Benefits of Boundary Adjustment

Increased Fee Revenues

Current visitor use of the White Reef Trailhead is approximately 1,200 visitors per year. Inclusion of additional facilities and services would allow for the collection of day use fees at the White Reef Trailhead, potentially generating as much as \$2,400 in revenues annually (or \$6,000 with proposed fee increase), assisting BLM to fund the long-term operation and maintenance of this trailhead and the Recreation Area. The White Reef Trailhead provides overflow parking for day use of the Recreation Area during the busy spring and fall. Use of the White Reef trail system also decreases crowding on the Red Reef Trail and the other heavily used trails in the campground area. The proposed boundary change would allow day use fees to be collected for use of the White Reef trail system and help to pay for operations costs at the Trailhead (e.g. toilet pumping, janitorial services) and provide additional fee revenues for the Recreation Area. The public would benefit from high quality recreation facilities and additional visitor amenities as a result of this change.

Increased Recreation Opportunities

The inclusion of the White Reef area and its associated amenities offer visitor experiences that are currently outside of the Recreation Area boundary. The additional points of interest such as the Orson B. Adams house, and the 1950s Hollywood movie set provide family oriented activities and an opportunity to learn about local history. All the points of interest in the vicinity are linked through geographic proximity, signing and interpretation, providing a diversity of activities for a wide range of visitor interests. This also assists in increasing visitor returns, as each visit could take advantage of a new trail, new point of interest, or other type of recreational experience, while utilizing common physical and service amenities.

Increased Interpretive Opportunities

The White Reef area provides additional opportunities for interpretation: geology, historic mining, historic agriculture, flora and fauna, as examples. The geologic setting is both beautiful and unique with its numerous Reefs: White Reef, Silver Reef, Red Reef, Leeds Reef, and its stunning red rock backdrop. Previous mining activities in the late 1800's are visible throughout the White Reef area. Silver mining played an important, albeit brief, role in local history. Since these historic mining activities span a large, interconnected area, BLM is partnering with the Silver Reef Heritage Corridor, a group of local organizations, communities, and governmental agencies interested in preserving and interpreting this area. During this mining period, Harrisburg and the Orson B. Adams House served provided needed agricultural products to the miners. Remnants of these agricultural pursuits are still seen in the landscape of the White Reef area. The White Reef area is also home to unique flora and fauna, including the endangered Shivwits milkvetch (*Astragalus ampullarioides*) and the threatened Mojave Desert tortoise. Interpretation of these rare plant and animal species could help to educate visitors about the diverse eco-systems found in southwestern Utah and the need for stewardship of these rare resources.

Dispersed Use/ Increased Area Parking

Currently the core visitation area within the Recreation Area is the campground/day use area extending into the Cottonwood Canyon Wilderness along the Red Reef Trail. Seasonally, visitation soars to the point of unsustainability in this core area, creating law enforcement issues, resource damage, conflicts with wilderness management, and inefficient use of staff labor. Through marketing, increased interpretation, and other strategies, visitors will be encouraged to explore the White Reef area, reducing visitor pressures on this core. Dispersing visitors away from the current core to the White Reef area, will increase parking opportunities that are extremely limit in the core.

Increased Opportunities for Stewardship

The Recreation Area attracts a high number of volunteers participating in a wide range of cultural, recreation, and natural resource projects. At times, it has been difficult to meet the public demand, requiring staff time and creativity. The expansion area allows for greater opportunities for additional, meaningful volunteer projects.



Photo 10. Orson B. Adams House

Section 6 – Priority Expenditures for Surplus Funds

6.1 Surplus Funds

Surplus funds are those in excess of what is required to cover the average annual operating costs for contractual services and E/M/S, and to maintain a one year average balance in fee revenue reserves. Table 14 indicates that, with the proposed fee increase, an estimated average of \$23, 734 in surplus funds would be available annually for expenditures.

6.2 Deferred Maintenance and Capital Improvements

Major DM/CI projects within the Recreation Area should be funded by Congressionally-appropriated funds. For example, the Recreation Area is scheduled to receive approximately 1.2 million in fiscal year 2013, through BLM's 5-Year Deferred Maintenance and Capital Improvement Program, to increase safety, improve accessibility, and repair or replace deteriorating structures. However, additional health and safety, as well as functional projects may need to be accomplished outside the current and future Deferred Maintenance and Capital Improvement Plan. Such projects include:

- An entrance station to facilitate public contact and fee collection;
- Deferred maintenance to facilities over and above calculations included in the average annual operating costs for E/M/S;
- And construction of new trails to improve non-motorized access throughout the Recreation Area.

6.3 Other Projects

Outreach is a critical component of visitor satisfaction. Results from the 2011 Visitor Satisfaction Survey conducted in the Red Cliffs NCA indicated that visitors reported the following satisfaction measures:

- 64% for providing useful maps and brochures;
- 72% for ensuring public awareness of rules and regulations;
- 64% for providing quality educational and interpretive material about the resources at this site;
- 62% for providing stewardship information on how to protect the cultural and natural resources;
- 53% for providing a sufficient quantity of educational and interpretive materials about the resources at this site.

While these satisfaction measures represent the entire NCA, they include data collected from visitors to the Recreation Area (the Recreation Area was one of the public contact points for the survey). Current outreach materials include an informational brochure, on-site information kiosks (including fee information, rules and regulations, and activity ideas), and wayside interpretation panels at the Orson B. Orson House, Red Cliffs Archaeological Site, and the Silver Reef Dinosaur Track Site. Additional interpretative outreach will continue on projects discussed in 5.5 relating to geology, historic mining, historic agriculture, and flora and fauna, as funding is available for the production of new interpretive materials.

Section 7 – Public Outreach

7.1 Outreach Efforts

The following outreach efforts are being used to notify the public about the proposals contained in the draft Business Plan and the timeframes and methods through which the public can provide comments on these proposals:

- Copies are available at the Interagency Visitor Center, St. George Field Office, 345 East Riverside Drive, St. George, Utah.
- Posting of the draft Business Plan/EA on the BLM St. George Field Office website, Utah-BLM ENBB, and social media sites hosted by BLM;
- Posting of Information in the Recreation Area;
- News Releases provided to regional print and broadcast media;
- Mailing of news releases to local Tribal and community governments (Paiute Indian Tribe of Utah, Shivwits Band of Paiutes, Kaibab Band of Paiute, Town of Leeds, Toquerville, Cities of Hurricane, St. George, Washington, etc.), Washington County Commission, Red Cliffs Desert Reserve Habitat Conservation Advisory Committee, organized recreation groups that regularly use the Recreation Area, and other interested parties;
- Informal staff and management contacts with members of the public and visitors to the Recreation Area.

The draft Business Plan and associated EA will be provided for review and comment to the BLM Utah Recreation Resource Advisory Council (RAC). The Utah RAC is a 15-member advisory panel which provides advice and recommendations to the BLM on resource and land management issues for 22.9 million acres of public lands in Utah. The *Federal Lands Recreation Enhancement Act* mandates that the appropriate Recreation RAC reviews BLM recreation fee proposals, prior to agency approval. Comments from both the public at large and the BLM Utah RAC will be considered and modifications made to the draft Business Plan or EA, if needed, prior to approval and implementation. Similarly, any public comments on the EA will be evaluated and revisions made, if warranted. A Finding of No Significant Impact/Decision Record will be signed by BLM, authorizing the implementation of the Proposed Action or No Action alternative evaluated in the EA.

7.2 Summary of Public Comments

The following is a summary of all the written public comments received during the 30 day public comment period for the *Draft* Red Cliffs Recreation Area Business Plan. There were a total of 14 written comments received.

6-Supported Proposal

5-Opposed proposal

3-Did not express an opinion

Comments from those who supported the proposal:

- “Proposed fees are well warranted and well within the cost range of other fee areas.”
- “I am willing to pay the higher fee in order to help take care of the area.”
- “Proposed fees should be higher, especially for day use.”

The following is a summary of the comments from the Western Slope No Fee Coalition and others who express opposition to our proposal. They are opposed to the following:

- collection of fees on public lands;
- collection of Standard Amenity Fees for White Reef Park;
- BLM’s “Business Plan” format and content;
- Proposal to maintain a one year average balance in fee revenues in fee account.

7.3 Summary of UT Recreation RAC Recommendations

The Utah Recreation Resource Advisory Council voted unanimously in favor for the proposed action and recommended the implantation of the fee proposal as presented on February 22, 2013 in Salt Lake City. There were no other recommendations provided by the UT RRAC.

References Used to Develop Business Plan

Headwaters Economics 2011, *Economic Value of Public Lands in Washington County, Utah*, <http://headwaterseconomics.org>

U.S. National Forest Service, 2007 *National Visitor Use Monitoring Report for BLM St. George Field Office*

Pinkham, Richard, 2012 *Socioeconomic Baseline Report for the Resource Management Plans for the Beaver Dam and Red Cliffs National Conservation Areas and the Amendment to the St. George Field Office Resource Management Plan and the associated Environmental Impact Statement*, unpublished report on file, St. George Field Office, Bureau of Land Management

Yardley, Braden 2011 *Economic Impact of Visitor Spending, St. George Field Office, Bureau of Land Management*, unpublished report on file, St. George Field Office, Bureau of Land Management

University of Idaho Park Studies. *Red Cliffs National Conservation Area Visitor Survey*. Moscow: University of Idaho Park Studies, 2011

Appendix A United States Department of the Interior Bureau of Land Management

Environmental Assessment
UT-CO31-2013-0001-EA
January 2013

Boundary Adjustment for the Red Cliffs Recreation Area

Location: Red Cliffs National Conservation Area

Washington County, UT

Applicant/Address: Bureau of Land Management

Red Cliffs National Conservation Area
St. George Field Office
345 E. Riverside Drive
St. George, Utah 84790
435-688-3200
435-688-3252

Project Title
Boundary Adjustment for the Red Cliffs Recreation Area
(UT-CO31-2013-0001-EA)

CHAPTER 1
INTRODUCTION AND NEED FOR THE PROPOSED ACTION

INTRODUCTION

The Bureau of Land Management (BLM) has drafted a new Business Plan for the Red Cliffs Recreation Area that includes two proposals: 1) an administrative action to increase in the fees for overnight camping and day use of the Recreation Area and 2) adjustments to the boundaries of the Recreation Area. BLM would complete the remaining steps required by FLREA to establish a new fee site where Standard Amenity Fees would be charged for use of the designated parking, trailhead facilities, designated trails, and visitor amenities of the White Reef Park. These steps include publishing a Notice in the *Federal Register* six month in advance of implementing fee collection at this site. The media publication, solicitation of public input, and Recreation Resource Advisory Council review required by FLREA are being conducted in concert with the same requirements for the Recreation Area Business Plan. This Environmental Assessment (EA) has been prepared to disclose the potential environmental consequence that might result from the proposed boundary adjustments and the collection of standard amenity fees for day use of White Reef Park, in compliance with the National Environmental Policy Act (NEPA).

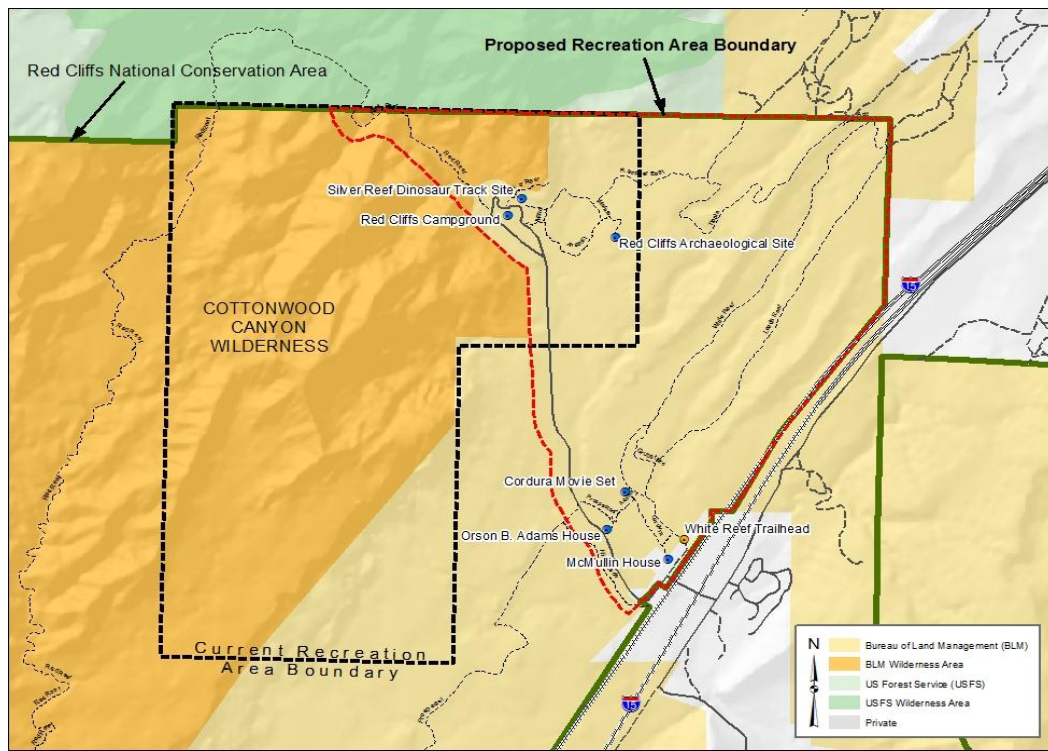
PURPOSE AND NEED FOR THE PROPOSED ACTION

The proposed boundary adjustments are needed at this time to facilitate management of the Recreation Area and increase the number and variety of recreation trails and other amenities available to visitors, by the inclusion of the public lands of the White Reef Park. Adjustment of the boundary would also allow BLM to collect standard amenity fees for day use of the additional non-motorized trails, points of interest, and other visitor amenities of the White Reef Park that would be included in the Recreation Area. Fees revenues would be used to maintain or improve site facilities and services to provide for high quality recreation experiences.

The current boundaries of the Recreation Area were established in the 1960s and do not reflect recent legislative changes that impact public lands management or the federal acquisition of a land tract adjacent to the Recreation Area. Map 1 shows the current and proposed boundaries of the Recreation Area boundary, which today encompasses approximately 1,200 acres. Congressional designation (P.L.111-11) of the Cottonwood Canyons Wilderness now precludes the management of approximately 888 acres of the current land base of the Recreation Area for developed recreation. Adjusting the boundary of the Recreation Area to exclude a majority of the wilderness acres would allow for consistent management of the land base of the Recreation Area for developed recreation.

The proposed boundary adjustment would add approximately 715 acres of public land adjacent to the Recreation Area, informally named the “White Reef Park. In 2009, BLM completed a management plan and EA (UT-100-08-EA-12) for recreational use of the “White Reef Park” to address recreational uses that would be compatible with the protection of the natural, cultural, and scenic values of the area. Through a Decision Record signed in January of 2010, BLM authorized non-motorized recreational

activities on designated trails, supported by adequate trailhead/parking facilities and other visitor amenities, on public lands in the White Reef Park.



Map 1 Proposed Recreation Area Boundary

CONFORMANCE WITH BLM LAND USE PLAN(S)

The *St. George Field Office Record of Decision and Resource Management Plan* (RMP, approved in 1999) is the BLM land use plan that currently provides objectives, goals, and management decisions for public lands within the Recreation Area, the Red Cliffs NCA, and the adjacent lands of the White Reef Park. P.L.111-11 (at Subtitle O, section 1974) directed BLM to complete a Resource Management Plan for the Red Cliffs NCA. Until this new RMP is completed and approved, management direction for the Recreation Area and the NCA are derived from the *St. George Field Office RMP*, as modified by the legislative changes that resulted from passage of P.L.111-11.

Although boundary adjustments for the Recreation Area were not specifically provided for in the *St. George Field Office RMP*, this action would be consistent with objectives, goals, and direction related to the protection of sensitive resources and the management of recreation on public lands. Specifically, management decisions RC-02 and RC-17 address the management of recreation opportunities for public benefit.

RC-02 – BLM will work collaboratively with affected user groups and organizations, state and local officials, and other interested parties in identifying existing and potential trails and use areas to meet public needs for hiking, mountain biking, rock climbing, and equestrian use. Where appropriate, BLM will enter into cooperative agreements with applicable partners to plan for, implement, and maintain such areas....

RC-17 – BLM will consider development of the following management activities and opportunities on public lands. Actual implementation will not take place unless site

specific planning is completed and necessary partners and resources become available. Strategies and funding for permanent maintenance of proposed facilities will need to be in place before BLM may act on development plans.

RELATIONSHIPS TO STATUTES, REGULATIONS AND OTHER PLANS

The Proposed Action is consistent with all applicable federal laws, regulations, and policies including:

Title I of *Federal Land Policy and Management Act* of 1976 declares that public lands will be managed in a manner "...that will provide for outdoor recreation and human occupancy and use."

The Federal Lands Recreation Enhancement Act (FLREA), 2004, replaced FLPMA as BLM's primary legal authority relating to the collection of recreation fees. This legislation authorizes BLM to collect recreation fees at sites that meet certain requirements. Under FLREA, standard amenity fees may be charged for sites and services that meet one of the following criteria. The site or area is:

A developed day-use area that provides significant opportunities for outdoor recreation and has substantial Federal investments, where fees can be efficiently collected, and contain all of the following six amenities:

- *Designated developed parking;*
- *Permanent toilet facility;*
- *Permanent trash receptacle;*
- *Interpretive sign, exhibit, or kiosk;*
- *Picnic tables; and*
- *Security services.*

The White Reef Park includes all of the amenities listed above and standard amenity fees for day use can be charged for use of its facilities.

Other NEPA Analyses that Limit the Scope of this EA

This EA is tiered to the White Reef Park Management Plan/ EA (UT-100-08-EA-12) prepared by BLM in 2009, which addressed the management of non-motorized recreation on 5.8 miles of designated trails in the White Reef Park; the construction of new trails, a 5 acre trailhead with various amenities; and the interpretation of points of interest, though trail access, interpretive signing, and protective measures. The resource values of the White Reef Park were described in the EA and the potential impacts of the proposed management of White Reef Park for non-motorized recreation disclosed. Resource values that were considered in detail included cultural resources, threatened or endangered species, soils and vegetation resources, fish and wildlife, including special status species, recreation, and visual resources.

Public notification of the proposed White Reef Park management plan/ EA was posted on the Utah BLM Environmental Notification Bulletin Board, in August of 2008. A similar posting was made in the Public Room of the SGFO, in St. George, UT. Notices of Availability for the management plan/EA were mailed to other federal and state agencies and tribal governments. Consultations were conducted under Section 106 of the National Historic Preservation Act with the Utah State Historic Preservation Officer and under Section 7 of the Endangered Species Act, with the U.S. Fish and Wildlife Service. The public was provided a 30 day scoping period during which to submit comments or concerns about the project and a

30 day review and comment period on the EA. A Finding of No Significant Impact and Decision Record were signed in January of 2010 and implementation of the White Reef Park management plan was initiated.

The resource descriptions and impacts analyses contained in this EA (UT-100-08-EA-12) are incorporated by reference in this document. This EA addresses only the resources and impacts that might result from the proposed boundary adjustments for the Recreation Area and the collection of standard amenity fees for day use of White Reef Park area.

Issue Identification

A BLM Interdisciplinary Team (ID Team) evaluated the Proposed Action and identified those resource values that required detailed analysis in this EA. These resources and the rationale for ID Team determination are identified and summarized in **Appendix A** (Interdisciplinary Team Analysis Record Checklist).

Issue Carried Forward for Analysis

Recreation: The Proposed Action would primarily be a benefit to recreational users of the public lands by augmenting the number and diversity of visitor amenities in the Recreation Area, as adjustments to the boundaries to add the public lands, recreation facilities, and visitor amenities of the White Reef Park. If the Proposed Action is authorized, BLM could charge standard amenity day use fees and sell Annual Day Use Passes for use of the trails and visitor amenities of the White Reef Park. The inclusion of the White Reef Park in the Recreation Area and the collection of day use fees were not addressed in the Management Plan/EA in 2009. For this reason, this issue is carried forward for analysis in the current EA.

CHAPTER 2 DESCRIPTION OF ALTERNATIVES

INTRODUCTION

This EA considers the Proposed Action and a No Action alternative. The No Action alternative is considered and analyzed to provide a baseline for comparison of the impacts of the proposed action.

PROPOSED ACTION

The Proposed Action would adjust the boundaries of the Recreation Area to remove approximately 888 acres of the Cottonwood Canyons Wilderness and add approximately 715 acres of public lands in the White Reef Park, with its visitor amenities of the White Reef Trailhead, trail system, and historic points of interest the Recreation Area. Map 3 displays the new Recreation Area boundary under the Proposed Action, which would reduce the acreage to approximately 870 acre from the current 1200 acres. Under the Proposed Action, BLM could charge standard amenity day use fees that are authorized for the Recreation Area for use of the trails, trailhead, and visitor amenities of the White Reef Park.

NO ACTION

Under the No Action alternative, the proposed boundary adjustments to exclude 888 acres of designated wilderness in the Cottonwood Canyons Wilderness and include 715 acres of the White Reef Park in the Recreation Area would not be authorized. Current management of the Recreation Area and adjacent

public lands would continue unchanged. Standard amenity day use fees would not be collected at the White Reef Trailhead for use of the designated trails and other visitor amenities of the White Reef Park.

CHAPTER 3 AFFECTED ENVIRONMENT

INTRODUCTION AND GENERAL SETTING

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist. The checklist indicates which resources of concern are either not present in the project area or would not be impacted to a degree that requires detailed analysis. Resources which could be impacted to a level requiring further analysis are described in Chapter 3 and impacts on these resources are analyzed in Chapter 4 below.

Resource A: Recreation

During the past 5 years, approximately 28,600 visitors annually engaged in activities in the Recreation Area: 24,675 day use visitors and 3,940 overnight camping visitors. The primary visitation area within the Recreation Area is currently the campground and day use area, and the Red Reef Trail, which enters the Cottonwood Canyon Wilderness from the campground. Seasonally, visitation soars in this core area, creating law enforcement issues, resource damage, conflicts with wilderness management, and inefficient use of staff labor.

Current visitor use of the White Reef Park is approximately 1,200 visitors per year, using the trails, facilities, and service provided in the area (refer to Table 1). The White Reef Trailhead consists of designated parking for 18 vehicles and 4 pull-thru stalls for oversized vehicles (equestrian trailers and RVs). It also includes a vault toilet, an information kiosk, and a shade shelter with picnic table. Also included are three designated vehicle parking spaces (2 ADA accessible) at the Orson B. Adams House.

Table 1. Facilities and Visitor Services of White Reef Park

Facilities					
Information Kiosk	Interpretive Stations	Shade Shelter	Vault Toilet	Parking (equestrian facilities)	Non-Motorized Trails
✓	✓	✓	✓	✓	✓
Services					
Law Enforcement	Park Ranger	Toilet Janitorial	Toilet Pumping	Maintenance	Information Brochures
✓	✓	✓	✓	✓	✓

CHAPTER 4 ENVIRONMENTAL IMPACTS

DIRECT AND INDIRECT IMPACTS

This EA is tiered to the White Reef Park Management Plan/ EA (UT-100-08-EA-12) prepared in 2009, that addressed the management of non-motorized recreation on designated trails in the White Reef Park, the construction of new trails, a 5 acre trailhead with various amenities, and the interpretation of points of interest, though trail access, interpretive signing, and protective measures. A Finding of No Significant Impact and Decision Record were signed in January of 2010 and implementation of the White Reef Park Management Plan authorized.

The current EA incorporates by reference the resource descriptions of cultural resources, threatened or endangered species, soils and vegetation resources, fish and wildlife, including special status species, recreation, and visual resources. The potential impacts on these same resources that were disclosed in the earlier EA are also incorporated by reference here, thus limiting the scope of the current analysis.

PROPOSED ACTION

The proposed adjustments to the boundaries of the Recreation Area would not result in direct or indirect impacts on resource values or authorized land uses, as scope and intensity of the current recreation uses would remain unchanged. Adjusting the boundaries of the Recreation Area to exclude 888 acres of designated Wilderness would facilitate management of all lands remaining for developed recreation.

Resource A: Recreation

The Proposed Action would confer many benefits for recreational users of public lands who enjoy non-motorized recreation activities and visiting interpreted points of interest. These benefits can be summarized as follows:

Increased Recreation Opportunities

Inclusion of the 715 acre White Reef Park and its associated amenities offer visitor experiences that are currently not available in the Recreation Area. The interpreted Orson B. Adams house and the 1950s “They Came to Cordura” movie set would provide family-oriented points of interest and opportunities to learn about local history. The variety and proximity of these points of interest would increase visitor returns, as each visit could take advantage of a new trail, new point of interest, or other type of recreational experience, while utilizing common physical and service amenities.

Dispersed Visitor Use/ Increased Area Parking

Currently the core visitation area within the Recreation Area is the campground/day use area extending into the Cottonwood Canyon Wilderness along the Red Reef Trail. High levels of recreational use day

from February to June each year in this core area often result in resource damage and impacts on quality wilderness experience. The White Reef Trailhead currently provides overflow parking for day use of the Recreation Area during the busy spring and fall. Adjustment of the boundaries to include the additional 715 acres, trails, and trailhead parking of the White Reef Park could help to relieve parking pressures in the campground and relieve crowding on the day use trails, include the Red Reef Trail. Use of the White Reef trail system also decreases crowding on the Red Reef Trail and the other heavily used trails in the campground area. Under this alternative, visitor experience would be improved and resource damage minimized.

Increased Fee Revenues

The collection of day use fees for use of the White Reef Par trails, facilities, and services could potentially generate as much as \$2,400 in revenues annually at the current fee rate (or \$6,000 with proposed fee increase). The collected fees would be used to help to pay for operations costs at the White Reef Trailhead (e.g. toilet pumping, janitorial services) and provide additional fee revenues to assist with operations costs for the other facilities of the Recreation Area.

Impacts of Fees on Recreational Users

Under the Proposed Action, collecting day use fees at the White Reef Trailhead for use of trails and amenities of the White Reef Park could create negative economic impacts on some users. The standard amenity fees for day use are currently \$2.00 per carload, but predicted to rise to \$5.00 per carload in 2013, which represents a Fair Market Value fee for the amenities and services provided at the Trailhead and elsewhere in the Recreation Area. As no fees are currently charged for recreational use in the White Reef Park, some recreationalists may be opposed to this proposal and others might not be able to pay.

The socioeconomic profiles of visitors specifically to the Recreation Area are unknown at this time. In 2010, the BLM conducted a Visitor Satisfaction Survey for the Red Cliffs NCA that included locations in the Recreation Area. Data collected showed that local visitors to the Red Cliffs NCA are nearly equal in number to those who have traveled from outside the area.

Based on U.S. Census data (2010), less than 5% of residents in Washington County have annual household incomes that place them in low income categories. This percentage is lower than the state average of 6.9% and substantially lower than the national average of 9.6%. As shown in Chart 1, household incomes in Washington County are well above poverty and low income level. Based on these data, the proposed collection of fees for day use of the White Reef Park would likely have little or no effect on the small percentage of low income residents of Washington County.

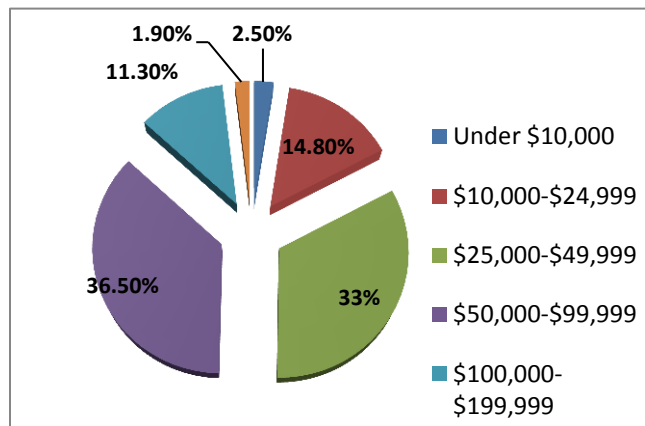


Chart 1. Annual Household Income of Residents in Washington County.

NO ACTION

Under the No Action alternative, the boundaries of the Recreation Area would not be adjusted to remove acreage that is within the Cottonwood Canyons Wilderness, where developed recreation facilities cannot be constructed, pursuant to requirements of the Wilderness Act. The 715 acre White Reef Park non-motorized trail system, recreation facilities, and points of interest would not be added to the Recreation Area. The opportunity for BLM to collect standard amenity day use fees for recreational use of the White

Reef Park recreational facilities would be foregone, at least in the short term. Under this alternative, there would be no direct or indirect impacts on natural or cultural resource values or current recreational uses, as existing management would continue.

Resource A: Recreation

In the long term, some recreational users could be negatively impacted, if Congressionally-appropriated funds that BLM receives annually to maintain recreation facilities are substantially reduced. Without the additional revenues from fees collected for use of the White Reef Park facilities, BLM may not be able to continue to maintain a vault toilet at the White Reef trailhead or make repairs or improvements to the trail system. If these facilities deteriorate due to lack of federal funding, the visitor experience of recreational users of the White Reef Park could be degraded.

CUMULATIVE IMPACTS

Because there would be no direct or indirect environmental impacts from the proposed or no action alternatives, there would be no cumulative impacts.

CHAPTER 5 PERSONS, GROUPS, AND AGENCIES CONSULTED

The public was notified about this proposal and the EA through the Utah-BLM Environmental NEPA Notification Board, through posting of the Draft Business Plan/EA on January 10, 2013. The following methods were also used to provide the public, local municipal, county, state, and other federal government entities with information about the proposed actions.

- Copies made available at the Interagency Visitor Center, St. George Field Office, 345 East Riverside Drive, St. George, Utah.
- Posting of the draft Business Plan/EA on the BLM St. George Field Office website, Utah-BLM ENBB, and social media sites hosted by BLM;
- Posting of information in the Red Cliffs Recreation Area and White Reef Park;
- News release provided to regional print and broadcast media;
News release sent to local Tribal and community governments (Paiute Indian Tribe of Utah, Shivwits Band of Paiutes, Kaibab Band of Paiute, Towns of Leeds, Toquerville, Virgin, LaVerkin, Cities of Hurricane, St. George, Washington, Washington County Commission, Red Cliffs Desert Reserve Habitat Conservation Advisory Committee, organized recreation groups that regularly use the Recreation Area, and other interested parties;

The Draft Business Plan /EA will be provided for review and comment to the BLM Utah Recreation Resource Advisory Council (RAC). The Utah RAC is a 15-member advisory panel which provides advice and recommendations to the BLM on resource and land management issues for 22.9 million acres of public lands in Utah. Comments from both the public at large and the BLM Utah RAC will be considered and modifications made to the draft Business Plan or EA, if needed, prior to approval and implementation. Similarly, any public comments on the EA will be evaluated and revisions made, if warranted. A Finding of No Significant Impact/Decision Record will be signed by BLM, authorizing the implementation of the Proposed Action or No Action alternative evaluated in the EA.

Table 5.1. List of Persons, Agencies and Organizations Consulted

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Utah Resource Advisory Council	Review of Draft Business Plan	

Table 5.2. List of BLM Preparers and Reviewers

Name	Title	Responsible for the Following Section(s) of this Document
Dawna Ferris-Rowley	NCA Manager	Technical Review
Kyle Voyles	NCA Outdoor Recreation Planner	Recreation
Tim Croissant	NCA Biologist	NEPA Adequacy Review

APPENDIX A

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Boundary Adjustments for the Red Cliffs Recreation Area

NEPA Log Number: DOI-BLM-UT-C031-2013-0001-EA

File/Serial Number: UT-100-13-001R

Project Leader: Kyle Voyles

Project Description:

The project proposal is to adjust the boundaries of the Recreation Area to exclude approximately 888 acres of designated wilderness in the Cottonwood Canyons Wilderness and include approximately 715 acres of public land adjacent to the north and east sides of the Recreation Area, in what BLM has called the White Reef Park. Boundary adjustment would facilitate management of the Recreation Area, increase the number and variety of recreation trails and other amenities available to visitors and allow BLM to collect standard amenity fees for day use of the White Reef Park trailhead, non-motorized trail system, and interpreted points of interest. Fees revenues would be used to maintain or improve site facilities and services to provide for high quality recreation experiences.

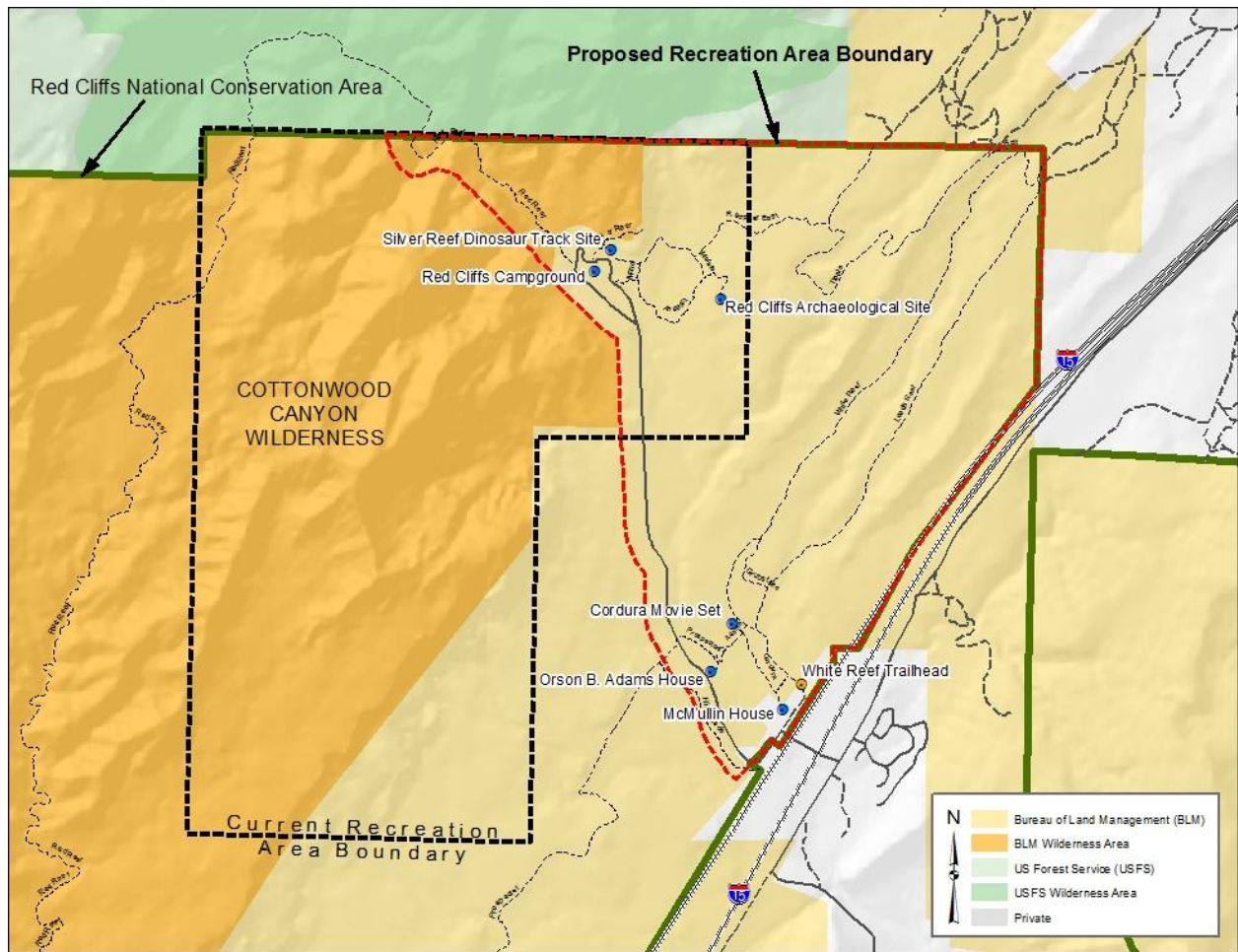
This EA incorporates by reference the information contained in the Draft Business Plan and the resource descriptions and analyses developed in the EA (UT-100-08-EA-12) prepared in 2009 to support a management plan for the White Reef Park.

Background: The current boundaries of the Recreation Area were established in the 1960s and do not reflect legislative changes and land acquisitions that have occurred since that time. The attached map illustrates the current Recreation Area boundary, which encompasses approximately 1,200 acres, as well as the proposed Recreation Area boundary, which would reduce the acreage to approximately 870 acres, but add other visitor amenities and points of interest.

The Recreation Area currently encompasses 888 acres of the Cottonwood Canyon Wilderness, designated by Congress in 2009. Developed recreation facilities or amenities cannot be constructed in designated wilderness areas, as this area must be managed to protect its natural character. Adjusting the boundary of the Recreation Area to exclude a majority of the wilderness acres would be consistent with the intent of managing the public lands within the Recreation Area for developed recreation.

The proposed Recreation Area boundary adjustment would add the visitor amenities of the White Reef Park, including the trailhead, approximately 6 mile loop non-motorized trail system, and historic points of interest. The White Reef Trailhead consists of designated parking for 18 vehicles and 4 pull-thru stalls for oversized vehicles (equestrian trailers and RVs). It also includes a vault toilet, an information kiosk, and a shade shelter with picnic

table. Also included are three designated vehicle parking spaces (2 ADA accessible) at the Orson B. Adams House and interpretive stations at both the Orson B. Adams House and the Cordura Movie Set. In 2009, BLM developed a management plan for recreational use of the White Reef Park, supported by an EA (UT-100-08-EA-12). The EA disclosed the potential environmental impacts on natural and cultural resources of the project area. A Finding of No Significant Impact/Decision Record was signed in January of 2010, authorizing the proposed action to manage the White Reef Park for non-motorized recreation on designated trails on public lands and the development of new recreation facilities, including the White Reef Trailhead and other amenities.



Map1: Current and Proposed Recreation Area Boundaries

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality	The Proposed Action would not measurably or negatively impact air quality, as there would be no changes in the scope or intensity of the existing land uses and no construction or new developments are proposed that could impact this resource. EA UT-100-08-EA-12, prepared for the management plan that BLM developed in 2009 for the White Reef Park disclosed the impacts of management for non-motorized recreation on designated trails on public lands in the Park and adjacent Recreation Area and the development of new recreation facilities in the White Reef Park area and concluded that the effects would be short term, localized, and generally unquantifiable.	Dave Corry	12/17/12
NI	Greenhouse Gas Emissions**	Ongoing scientific research has identified the potential impacts of anthropogenic (man-made) greenhouse gas (GHG) emissions and changes in biological carbon sequestration due to land management activities on global climate. However, there are currently no "credible scientific" methods to predict the potential climate change impacts from project specific GHG emissions. There would be no GHG emissions from the proposed action, as there would be no changes in the scope or intensity of the existing land uses and no construction or new developments are proposed that could impact this resource.	R. Schreiner	12/17/12
NP	Wastes (hazardous or solid)	There are no hazardous or solid wastes in the project area and none would be generated by the Proposed Action.	R. Schreiner	12/17/12
NI	Water Resources/Quality (drinking/surface/ground)	The Proposed Action would have no impact on surface water quality in Leeds and Quail Creeks, as there would be no changes in the scope or intensity of the existing land uses and no construction or new developments are proposed that could impact this resource. EA UT-100-08-EA-12, prepared for the White Reef Park management plan in 2009, disclosed the	Dave Corry	12/17/12

Determination	Resource	Rationale for Determination*	Signature	Date
		impacts of managing for non-motorized recreation on designated trails on public lands in the Park and adjacent Recreation Area and developing new recreation facilities in the White Reef Park. This EA found that there would be no impacts on surface water or groundwater resources.		
NP	Areas of Critical Environmental Concern	The project area is not within a designated ACEC	T. Croissant	12/17/12
NI	Cultural Resources	The Proposed Action would not measurable or negatively impact prehistoric or historic period resources in the project area, as there would be no changes in the scope or intensity of the existing land uses and no construction or new developments are proposed that could impact this resource. The EA (UT-100-08-EA-12), prepared for the management plan that BLM developed in 2009 for the White Reef Park disclosed the impacts of management for non-motorized recreation on designated trails on public lands in the Park and adjacent Recreation Area and the development of new recreation facilities in the White Reef Park area. Adverse impacts to National Register-eligible properties within the Area of Potential Effect for the White Reef trailhead construction were avoided through project design. No potential impacts related to continued management of the project area for non-motorized recreation on designated trails in the White Reef Park have been identified. Section 106 consultations conducted with the Utah State Historic Preservation Officer agreed with BLM's finding of "No Effect to Historic Properties" related to the management of the White Reef Park for non-motorized recreation.	W. Banek	12/21/12
NP	Native American Religious Concerns	BLM engages in government-to-government consultations with American Indian Tribes that claim affiliation to this region to identify sacred sites, Traditional Cultural Properties, or other areas with religious concerns. Consultations are conducted with the Paiute Indian Tribe of Utah, its respective Bands under the protocols established through a Memorandum of Understanding, signed with BLM in 1999. To date, no religious concerns have been identified by consulting tribes within this project area.	W. Banek	12/21/12
NI	Paleontology	The Proposed Action would not measurable or negatively impact scientifically important paleontology resources in the project area, as there would be no changes in the scope or intensity of the existing land uses and no construction or new developments are proposed that could impact this resource. EA (UT-100-08-EA-12), prepared for the management plan that BLM developed in 2009 for the White Reef Park disclosed that there would be no impacts as a result of non-motorized recreation on designated trails in this area.	R. Schreiner	12/17/12
NI	Geology / Mineral Resources/Energy Production	In 2009, the Red Cliffs NCA was Congressionally withdrawn from mineral entry and operation of the mining laws, mineral leasing, mineral materials sales, and renewable energy production, subject to valid existing rights. There are no valid existing rights in the Recreation Area or in the White Reef Park, so production of these resources cannot occur in the project area.	R. Schreiner	12/12/12
NI	Environmental Justice	The Proposed Action, by its scope and nature, would not result in disproportionately high or adverse health or environmental impacts on low income or minority	T. Croissant	1/7/2013


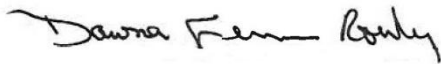
Determination	Resource	Rationale for Determination*	Signature	Date
		populations. The proposed collection of fees for use of the White Reef Park area within the Recreation Area would not result in disproportionate impacts on any group of public land users. The fees were calculated using a Fair Market Value analysis and are at or below the rates charged by other recreation sites with similar amenities in Washington County.		
NI	Socio-Economics	The Proposed Action, by its scope and nature, would not result in measurable or negative impacts on the economy of Washington County. Fees have been charged for use of the Recreation Area for more than 40 years, so this is not a new or changed situation. The proposed fee increases identified in the Draft Business Plan for camping and day use were calculated using a Fair Market Value analysis and are at or below the rates charged by other recreation sites with similar amenities in Washington County. Adjusting the boundaries of the Recreation Area to include the White Reef Park would generate additional revenues that BLM would use to maintain facilities and services, helping to ensure that the quality of visitor experiences remains high. High quality visitor experiences would encourage repeat visitation, which could benefit destination tourism and the local economy of Washington County.	K. Voyles	1/7/13
NP	Farmlands (Prime or Unique)	No prime or unique farmlands occur in the project area.	D. Corry	12/17/12
NI	Soils	This Proposed Action would have no effect on soils as there are no surface disturbances proposed or changes in use of the public lands. Recreational uses outside of the developed campground, day use areas and trailhead are non-motorized on designated trails and this use would not change in scope or intensity as a result of the proposed boundary changes.	D. Corry	12/17/12
NI	Floodplains	The Proposed Action would have no effect on the narrow floodplains along Quail and Leeds Creek, as there are no surface disturbances proposed or changes in use of the public lands. Recreational uses would not change in scope or intensity as a result of the proposed boundary changes.	D. Corry	12/17/12
NI	Wetlands/Riparian Zones	This Proposed Action would have no effect on the riparian zones along Quail and Leeds Creek, as there are no surface disturbances proposed or changes in use of the public lands. Recreational uses would not change in scope or intensity as a result of the proposed boundary changes. The impacts on riparian areas from recreation uses were analyzed for the White Reef Park in EA UT-100-08-EA-12 and found to be inconsequential.	D. Corry	12/1/7/12
NI	Fish and Wildlife Excluding USFW Designated Species	This Proposed Action would have no effect on fish and wildlife resource, as there would be no measurable changes in uses of the public lands in the Recreation Area or the White Reef Park, based on boundary adjustments or fee collection. No new projects, trails, or recreation developments are proposed that could create disturbances to wildlife and there would be no loss of habitat as a result of the proposed boundary adjustments. Non-motorized recreation on designated trails or in the developed campground and day use areas would not change in scope or intensity as a result of the proposed boundary changes.	T. Croissant	12/17/12

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Migratory Birds	<p>This Proposed Action would have no effect on migratory birds that may be seasonally present, as there would be no measurable changes in uses of the public lands in the Recreation Area or the White Reef Park. No new projects, trails, or recreation developments are proposed that disturb nesting birds or seasonal migrants and there would be no loss of habitat as a result of the proposed boundary adjustments.</p> <p>Non-motorized recreation on designated trails or in the developed campground and day use areas would not change in scope or intensity as a result of the proposed boundary changes.</p>	T. Croissant	12/17/12
NI	Threatened, Endangered or Candidate Plant Species	<p>This Proposed Action would have no effect on populations of Shivwits milkvetch (<i>Astragalus ampullaroides</i>), an endangered native plant species that does occur within the White Reef Park. The plant populations and habitat are protected by enclosure fencing that prevents public access to the plants and habitat. Monitoring of these populations since 2009 has shown that the non-motorized recreation use on designated trails that is currently taking place has not impacted the plants or their habitat. The Proposed Action would not be expected to result in measurable changes to the levels of recreation uses of the public lands in the White Reef Park. No new projects, trails, or recreation developments are proposed that could impact Shivwits milkvetch or result in a loss of habitat.</p>	T. Croissant	
NI	Threatened, Endangered or Candidate Animal Species	<p>The Recreation Area is within designated critical habitat for the Mojave desert tortoise (<i>Gopherus agassizi</i>), a threatened native species. The White Reef Park is not within designated critical habitat, but may support very low densities of tortoises, because the habitat quality is considered to be low. There is some potential that California condors, an endangered species, may overfly the Cottonwood Canyons Wilderness, but there have never been confirmed sightings in this area of Washington County.</p> <p>The proposed boundary modifications to the Recreation Area and proposed fee collection for day use of White Reef Park trails and facilities would have no effect on either of these species. The Proposed Action would not result in measurable changes to the levels of recreation uses of the public lands in the Recreation Area or White Reef Park and all authorized recreation uses would be non-motorized (hiking, mountain biking and equestrian trail riding) on designated trails. Non-motorized recreation on designated trails is considered to be an acceptable use in Mojave desert tortoise habitat, as it does not result in direct or indirect impacts on the species. There would be no new developments or facilities in the Recreation Area or White Reef Park that would create new uses or activities that would impact threatened or endangered species or designated critical tortoise habitat.</p>	T. Croissant	1/7/13
NI	Vegetation Excluding USFW Designated Species	<p>The Proposed Action would not result in measurable impacts on vegetation in the Recreation Area or White Reef Park, as all authorized recreation uses would be within developed sites or non-motorized (hiking, mountain biking and equestrian</p>	T. Croissant	1/7/13

Determination	Resource	Rationale for Determination*	Signature	Date
		trail riding) activities on designated trails. There no proposed new developments or facilities in either area that would result in impacts to or loss of native vegetation..		
NP	Woodland / Forestry	There are no woodlands or forestry resources in the proposed project area.	D. Corry	12/17/12
NI	Fuels/Fire Management	The project would not impact goals and objectives associated with current BLM management plans addressing fuels and fire management within the project area.	T. Croissant	12/17/12
NI	Invasive Species/Noxious Weeds (EO 13112)	Non-native invasive species, primarily brome grasses, occur in the Recreation Area and the White Reef Park, as both areas were formerly grazed by domestic livestock and, at the historic settlement of Harrisburg, the lands were cultivated. Small infestations of scotch thistle also occur on the historic fields of Harrisburg, in the White Reef Park. Non-motorized recreational use of designated, hardened trails in the White Reef Park is an ongoing activity that would not change under the Proposed Action. The Proposed Action to adjust boundaries for the Recreation Area and collect fees for recreational day use of the White Reef Park would not introduce or spread invasive species or noxious weeds.	Jackie Roaque	12/17/12
NP	Lands/Access	There are no land access issues.	Teresa Burke	12/17/12
NP	Livestock Grazing	There is no licensed livestock grazing within the project area.	Jackie Roaque	12/17/12
NP	Rangeland Health Standards	This project should have no effect on the Standards of Rangeland Health, as current land uses would remain unchanged and no new projects or developments proposed. Recreation use in the project area is non-motorized on designated trails or within the developed campground and day use area.	Jackie Roaque	12/17/12
PI	Recreation	<p>The Proposed Action to modify the boundaries to include the White Reef Park trails, trailhead, and other amenities would have positive and minor negative impacts on recreationalists.</p> <p>The boundary adjustments would provide diverse opportunities for hiking, mountain biking, and equestrian trail riding on 5.8 miles of designated trails, within the Recreation Area. The White Reef Trailhead offers designated parking areas, restrooms, a picnic shelter, and interpretive materials that improve the quality of visitor experiences and understanding of the resource values of the public lands in the Recreation Area and NCA.</p> <p>Some recreational users may perceive that the collection of standard amenity day use fees for use of the White Reef Park trails and amenities is a negative impact on them or an unwarranted charge for the use of public lands. However, the revenues that are generated from these fees would allow BLM to continue to maintain and improve these facilities, so that visitor experiences and satisfaction remain high. As the proposed fees are similar to or lower than those charged by other recreation sites in Washington County with similar amenities, the economic impacts on most recreational users of the Recreation Area would be minimal.</p>	K. Voyles	1/7/13

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Visual Resources	There would be no impacts on visual resources as there are no proposals for developments or land uses that could affect visual resources	K. Voyles	1/7/2013
<u>NLCS</u>				
NI	National Conservation Areas	The Proposed Action would not measurable or adversely affect the resource values for which the Red Cliffs NCA was designated. Protecting and enhancing appropriate types of recreational use of NCA was one of the Congressionally-defined purposes for the NCA.	T. Croissant	1/7/13
NP	National Historic Trails (Old Spanish Trail)	The Old Spanish National Historic Trail does not cross the project area.	K. Voyles	1/7/13
NP	National Recreational Trails (Gooseberry)	There are no National Recreation Trails within the project area.	K. Voyles	1/7/13
NP	Wild and Scenic Rivers	There are no designated or eligible WSR segments in the project area.	K. Voyles	1/7/13
NI	Wilderness/WSA	<p>The current boundary of the Recreation Area includes approximately 888 acres of the designated Cottonwood Canyons Wilderness. The Red Reef trail that originates in the campground allows hiking access to the wilderness. The proposed boundary adjustments would remove wilderness acreage from the Recreation Area, facilitating consistent management of the land base. The addition of the 715 acres of the White Reef Park, with its additional trails and visitor points of interest, should reduce seasonally high visitor use of the Red Reef trail. This could result in positive, but generally unquantifiable, benefits to wilderness resources.</p> <p>There are no Wilderness Study Areas in the St. George Field Office.</p>	K. Voyles	1/7/13
NI	Areas with Wilderness Characteristics**	There no lands with Wilderness Characteristics in the project area.	K. Voyles	1/7/13

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator		2/28/2013	
Authorized Officer		2/28/2013	