

**Colorado RRAC: Attachment B**  
**US Forest Service - Region 2**  
**BLM - Colorado**  
**Recreation Fee Proposals**  
**Summary of Public Involvement**

**Date: Jan. 5, 2016**

**Unit: BLM Royal Gorge Field Office**

**Proposal: New Fee X Fee Change \_\_\_**

**Summary of Fee Proposals:**

**(for multi-fee structure, replace with other graphic if needed)**

Site/Service	Current Price	Proposed Price
Guffey Gorge Day-Use Area	No fee	\$6.00 per vehicle

**Public Participation (List of Potential) Activities:**

Public Participation Tasks	Date(s)
Posted notice at (Unit Location) inviting comments on fee proposal.	Posted on BLM RGFO Website.
Comment Period for Draft Environmental Assessment.	8/2014 Press release went out to media. A permit and fee was identified in the proposed action for the Guffey Gorge Management Plan. Information was also provided on the BLM RGFO website and sent through Guffey shares email.
Comment Period for Draft Business Plan	4/19- 5/13/2016
Posted notice at Guffey Gorge Day-Use Area inviting comments on fee proposal.	Notices posted at the Guffey Gorge Day-Use Area kiosk
Published press releases announcing fee proposal	4/19/2016 news release sent to approximately 30 media sources including radio and newspapers. Was not able to track the smaller newspapers to verify if the release was published. May 2016 published in the Ute Country News 4/20/2016 published in the Pueblo Chieftan 4/20/2016 published in the Colorado Springs Gazette 4/20/2016 news story on Channel 13 Colorado Springs
Article published in the (Newspaper, etc) explaining benefits of fee revenues.	Benefits explained in press releases listed above.
Internal memo sent out to RGFO employees announcing proposed fee changes.	4/19/2016
Posted information on fee proposal on RGFO web site.	4/19/2016 posted on Recreation page.
Posted Federal Register notice of proposed new fees (if appropriate) as per REA, Sec. 4 (b).	<b>Date/2016</b>
Letter sent to residents near the (Fee Area) announcing proposed new fee.	4/20/2016 emailed press release to Guffey Shares- local community members
Briefed local Congressional Staff on fee proposal. Included Senators (List) offices and Congressional	none

Representative (List) offices.	
Briefed local County commissioners on fee proposal.	5/11/2016 Fremont County Commissioners
Personal contacts were made with (List) interested individuals/organizations about the fee proposal.	-Gold Belt Tour Scenic and Historic Byway Association -Front Range Resource Advisory Council
E-mails were sent to permitted individuals and organizations about the fee proposal.	No individuals or organizations permitted in this location

**Public Participation Results (include # of responses/category):**

Method of Communication	Summary of Comments- as of 6/8/2016
<b>Posted On-site Notices – (Guffey Gorge site)</b>	Not posted due to early time of year when very few visitors come to the site.
<b>Press Releases &amp; News Story of User Benefits</b>	Unknown
<p><b>BLM Web Site Posting and email responses for Draft Business Plan</b></p> <p><b>Total= 12</b></p>	<p>Support business plan:            August Bauby 5/6/2016            Bill Betz 4/22/16            Kathleen McCormick 5/7/16            Carol Todd 5/6/16 supports fee but increase to \$10.</p> <p>The following comments are related to the Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA), not the business plan.            Michelle Disque 5-11-16 Opposed to plan, close area            Kelly McConnell 5-6-16 Suggests limiting numbers</p> <p>Other:            Jacob Renfro 5-7-16 Supports keeping it clean and as is, does not support fee            Keith Upchurch 4-21-16 Main point supports having a place for kids to go.</p> <p>Kitty Benzar Western Slope No Fee Coalition 5-12-16</p> <ol style="list-style-type: none"> <li>1. The need for adding permanent toilets and picnic tables near the parking is not established. The site is popular for its primitive trail to a backcountry swimming hole, not as a destination picnic site. The agency's desire to do whatever it takes to make this a fee site is driving the process, not any documented public demand.</li> </ol> <p>Response: The need for providing toilets and improved parking is driven by the number of visitors coming to the site as identified in the 2015 Guffey Gorge Management Plan (DOI-BLM-CO-200-2013-0040 EA). In 2015, the number of visitors reached 26,000 with only 2 portable toilets and a trash dumpster provided. These amenities were heavily used by visitors to the site. The physical location of the swimming hole does not allow for placement, maintenance or pumping of a toilet at the swimming hole. The parking area is the only location that these facilities can be placed.</p> <ol style="list-style-type: none"> <li>2. The proposed "improvements" don't make economic sense. The \$45,775 cost of installing a permanent toilet could cover more than ten years of seasonal portable toilet rental and trash service. In addition, because the toilet would be closed and locked most of the year it is likely to become a target for vandals, rodents, and other damage and will just end up adding to the BLM's maintenance backlog. At a site with such a limited season in a remote location, providing portable toilets and trash receptacles during the high season and removing them the rest of the time makes more sense than installing permanent facilities. The total proposed investment of \$136,659 could cover 5.5 years of operating expenses at current levels. These "improvements" are being proposed solely to justify charging a standard amenity fee, they cannot be justified on economic grounds.</li> </ol>

Response: \$77,000 of the total proposed investment of \$136,659 covers the hardening and alignment of the parking area and engineering cost of oversight. This project will reduce erosion and impacts to water quality as well as improve visitor safety for ingress and egress. This improvement is necessary whether or not other amenities are installed. Another portion totaling \$10,000 was required to mark the boundary between BLM and private land due to numerous trespass issues and would have been done whether or not other amenities are installed. The \$45,775 cost to install a permanent toilet could cover ten years of service for a portable toilet, however, the BLM is charged with managing this site in perpetuity, not only for a ten year period. It is true that the \$45,775 could be invested in supplying portable toilets for the next ten years with the expense continuing after that time. By investing the funds into vault toilets early, only maintenance cost would continue. Further, outside funding sources are also being pursued to offset the initial investment costs to taxpayers including grants and partner contributions. Not having the restroom open during the off-season is seen as a strategy to reduce overall maintenance costs and high levels of vandalism or damage are not anticipated due to its location and visibility along a major county road.

3. A per vehicle enforcement system does not address the problems occurring at the site, such as alcohol and loud music. These are associated with the swimming hole, not the parking lot, so that's where enforcement should be focused.  
The plan proposes charging per-vehicle because law enforcement can be accomplished by walking around the parking lot checking fee compliance, but there is no correlation between paying fees and good or bad behavior. Are alcohol fueled rowdy behavior and loud music acceptable as long as the fee was paid? Are people who are willing/ able to pay less likely to cause a nuisance? The solution does not match the problem.

Response: The alcohol and loud music problems are addressed separately through the Guffey Gorge Management Plan ((DOI-BLM-CO-200-2013-0040 EA) proposed supplemental rules (FRN 81 35039). The rules include an alcohol ban and a ban on amplified sound. These rules cover the entire 80 acre site and will be enforced at the swimming hole and the parking area. The fee will be enforced at the parking area as stated.

4. Revenue projections are artificially high. The revenue projections assume that every vehicle will be paying the fee, even though Federal Recreation Passes will be accepted. There is no adjustment for how many people will use passes purchased elsewhere and thus not contribute to the cost of operating Guffey Gorge. In comparing the proposed fee to other sites, several NPS units and one BLM standard amenity fee site are included but without any analysis of how many people visiting those places use passes, which can be quite a substantial number. Several NPS units around the country have in fact stopped collecting an entrance fee because so many visitors have passes that it costs more to administer the fee than it brings in.

	<p>Response: The projected revenues in the business plan are estimates based on current visitation levels and do not account for Federal Recreation Passes. The BLM recognizes that some of the visitors to the site may use a Federal Recreation Pass, however, the overall number is anticipated to be low due to the demographics of visitors who are younger and do not typically purchase passes. Additionally, portions of revenue from Federal Recreation Passes sold at the Royal Gorge Field Office or the BLM Colorado State Office could be available for use at the site and would compensate for the number of passes used at the site.</p> <p>5. The fee at Gunnison Gorge Wilderness is included as a comparable, but it is not a standard amenity fee.</p> <p>Response: This is correct; Gunnison Gorge Wilderness is an Individual Special Recreation Permit and was removed from the final document. Upper Colorado River was also removed because it is an expanded amenity fee site.</p>
<b>Federal Register Notice</b>	n/a
<b>Letters to Neighbors</b>	n/a
<b>Congressional Staff Briefing</b>	n/a
<b>County Commissioners Briefing</b>	Supported the project by awarding grant funding to add amenities at the site.
<b>General Customer Contact Feedback</b>	<p>Front Range Resource Advisory Council- fee proposal to be presented on <b>date/2016</b></p> <p>Gold Belt National Scenic Byway Association- proposal was presented to this organization, and supported.</p>
<b>E-mail Responses from permitted groups Total=</b>	n/a