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Acting Field Office Manager  
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Monticello Field Office  
PO Box 7  
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Dear Mr. Quigley,

Since 2002, River Runners for Wilderness (RRFW) has represented a broad spectrum of river runners, wilderness lovers and American citizens who care about the wilderness river resources in the Colorado River watershed. Our members, now numbering over two thousand, continue to have a deep concern for the future of the wilderness values of the Colorado River watershed and the management of these national treasures.

Thank you for allowing the public an opportunity to comment on the recently released Draft Business Plan for the San Juan River, hereby referred to as the Business Plan. RRFW is pleased to participate in this form of democracy that allows citizen involvement in the management of the San Juan River, and our comments on the Business Plan are as follows:

We would like to start by pointing out that the Business Plan was published by the Bureau of Land Management's Monticello Field Office just before Christmas and allows only a 30 day window for public consideration, expiring January 25, 2013. We find this a particularly short comment period given the busy holiday season. We formally request a comment deadline extension for an additional 45 days. We also request that the Bureau of Land Management's Monticello Field Office conduct a direct mailing outreach to all San Juan River runners who applied for the 2012 do-it-yourself river runner lottery informing them of this opportunity to comment.

Please note that while the BLM refers to do-it-yourself river recreationists who explore the San Juan River on their own terms, plan their own trip itineraries, do their own cooking and pilot their watercraft as "private river runners" throughout the Business Plan, RRFW uses "self-guided" or "do-it-yourself" to identify these same individuals. We note do-it-yourself river runners do not use private businesses to gain access to the river as commercial passengers do.

Getting into the details of the Business Plan, we see that on pg. 5, it appears as though river runners will have to pay a fee to use the Sand Island Area, AND an additional fee to recreate on the river. Could you please justify the need for two fees to use this area?

On pg. 9, the Business Plan says that group size is 25 for self-guided river enthusiasts, 32 for commercial (25 passengers and 8 crew) users, and that the allocation of *"Commercial use is allowed up to 40% of total use. Two commercial day trips per day (one launch of 25 passengers and one launch of ten passengers) are allowed and are not included in the launch limits."*

Given the statement above, are the pg. 3 figures counting Commercial Day Users? Outside of the Day Trips, what is the summertime daily trip launch allowance? Is there a possibility for self-guided folks to do day trips without needing to go through the permit system? Most importantly, do the commercial day trip passengers pay a per-day use fee?

On pg. 11 we note that use figures are listed for the year and do not show month by month and day by day launch use. Could you please provide this data, especially in light of the proposed shortening of the lottery season?

Page 12 states that *"The RMP allows for up to 40% commercial use on the San Juan River, however, commercial use has only accounted for 27% of use over the last five fiscal years."* The data in the Business Plan does not show when the majority of these commercial trips occur. Could you please provide this missing information?

This section also notes *"As commercial SRP rates are set by national BLM policy and regulation, only the per-person SRP fees and a new non-commercial permit application fee are proposed for change."* Does the above sentence mean the self-guided folks are the only folks who will see a rate increase?

Page 12 also notes *"Data for the visitor origin of commercial passengers on the San Juan River is unavailable. However, it is likely that the origin of commercial passengers is much more widespread than that of private users, with more national visitation from beyond the four corners states region and more international visitation."* Without any data presented, speculation on the makeup of commercial trips is just that, speculation. Regardless of point of origin, all river runners boost the local economy through fuel, store, shuttle and lodging purchases. How will the BLM obtain this critical data on use demographics for their Business Plan?

On pg. 14, we note that fees were \$1.50 and \$3 in 1983 for the Sand Island to Mexican Hat and Mexican Hat to Clay Hills sections. The new fee proposal, 30 years later, is \$10 and \$20. Will ALL river visitors see the same increase in fees, including commercial crew and day users?

Page 15 notes there will be a \$6 fee to apply for the lottery. Page 11 noted there were 3,695 applications for the lottery. That equals possible revenue of \$22,170 in lottery application fees alone. Page 15 also notes *"There is currently no fee to apply for a private permit. The approximate number of applications received per year is about 5,000. It is anticipated that the number of applications received annually would decrease with the introduction of an application fee. At an estimated 25% decrease in the number of applications received per year, the proposed application fee would generate approximately \$22,500 in additional revenue."* Page 11 notes *"Each year the Monticello Field Office receives approximately 4,200 noncommercial applications for the permit lottery."* Could you please explain the discrepancy in the number of applicants per year? It also appears as though fees will be used as a tool to decrease the number of trip applications. Is this the intent? How was the "...25% decrease" calculated?

Page 15 also notes *"A significant amount of annual labor and costs are associated with processing applications and processing reservations for applicants who cancel their launches*

*before payment, submit multiple applications for the same group trip, or who submit an application as a backup to other permitted river trips simply because there is no fee.*" How does the introduction of a \$6 fee decrease cancellations, often based on water flows unknown at the time of the lottery? How does the introduction of a \$6 fee decrease "...multiple applications for the same group trip, or who submit an application as a backup to other permitted river trips." Will you please justify how the lottery application fee will stop these perceived problems?

The Business Plan states on pg. 16 that *"An application fee would not only help cover the administrative and overhead costs of processing applications and reservations, it would likely increase permitting efficiency by reducing the number of applications and cancellations received."* Can you please explain the rationale for fees being used to reduce the number of applications? We submit that our public lands managers should encourage visitation by the taxpayer citizens, not seek to decrease it.

On pg. 16, we also note *"A \$6.00 application fee would require a small investment and more intent on the part of the applicant to visit the San Juan River."* Could you please explain how the Recreation Fee Demonstration program is intended to allow fees to be used to increase visitor intent?

Additionally, pg. 16 notes *"Using pay.gov to collect applications online will cut lottery and application processing time and significantly reduce paper and mailing waste from the current mail-in/fax application process."* This statement notes that online lottery and application processing would cut processing time. If implementation of an online system means there will be cost savings, how does this justify a lottery application fee increase?

Page 17 notes *"the Monticello Field Office is proposing to shorten the lottery permit distribution season from April 1st through October 31st to April 15th through July 15th, in an effort to increase permitting efficiency."* While we are in support of a shortened lottery season, a shortened lottery season means there will be less work for staff. Again, how does this anticipated cost savings justify a lottery application fee?

The Business Plan states on pg. 17 under section D. Operating Costs, that *"In addition, the National Park Service's Southeastern Utah Group pumps the toilet vaults through an interagency agreement at Sand Island and Mexican Hat."* Could you please state who pays for this service provided by the NPS?

On pg. 19, Table 7, the Business Plan notes a one year shortfall of \$91,487. Could you please provide a section on how to cut \$91,000 worth of programs/services to make up this projected shortfall if fees were not increased?

Continuing on pg. 19, Section E. Revenues, the Business Plan notes *"In accordance with their permit stipulations, commercial permittees also pay penalty fees for failure to cancel or use launch reservations."* Could you please provide the last five years' actual amounts collected (not billed) from these failures, by year?

Page 20 notes *"Launch limits established for the San Juan River limit the amount of annual use,*

*leaving little room for significant future growth in annual visitation. Over the last 20 years, there has not been a steady growth trend in private or commercial visitation on the San Juan River. Visitation has steadily increased since 2002; however, visitation during the 1990s was at the same approximate level as the last five fiscal years. Within the last 20 years, annual visitation on the San Juan River has varied from year to year, peaking as high as 13,000 users and dipping as low 7,500 users (see Graph 1 on page 24).*” We would like to thank the BLM for maintaining use limits on the San Juan. These agency identified use limits are one of the sole contributing factors protecting the resource so well. We understand that increasing visitation numbers would increase fees collected, and appreciate that the BLM is not considering this option in this Business Plan. That said, Table 2 on pg. 11 would make it appear that self-guided use is increasing, and yet the paragraph above notes this is not the case. Could you please explain why this Business Plan presents the “appearance” of increased use as a need to increased fees?

The Business Plan states on pg. 22 that *“There is currently only a single vault toilet at the Sand Island boat launch. Due to the number of groups that launch from Sand Island, the single vault is often not enough to accommodate visitors and long lines form to use the facilities.”* Is there any data available to show how often this is occurring? Is there data available to show who these people in “...long lines...” are? Can you please provide data to show that these visitors are not day use river runners? If you cannot provide this information, how can you ask self-guided river runners to be burdened by fees to pay for this toilet upgrade?

Page 22 also notes *“The river program should ideally have one to two volunteers on staff from April through September.”* Given the rationale to decrease the lottery season to three months based on actual demand and use, why are all the summertime programs geared for 6 months? Surely a substantial savings could be obtained by reducing volunteer services to the three peak months only.

We note on pg. 23 that *“With the current low fund balance, if appropriated funds were significantly cut the San Juan River program would immediately be unable to operate at its current level of service.”* Given the national cutbacks in Federal Services, can you please justify why the services to river runners cannot be cut back as well?

Page 23 also notes *“The annual appropriated funds that are saved as a result of San Juan River fee revenues covering more of the program’s costs can be utilized by the Monticello Field Office to support other recreation program needs and maintenance backlogs throughout the field office that do not benefit from self-supporting program fees.”* Could you please justify why river runners need to pay increased fees so cost savings can be used to benefit other non-river related recreation programs?

Continuing on pg. 23, the Business Plan notes: *“In addition, the proposed increase will give the San Juan River program the ability to withstand the negative financial impacts of drought and low water years.”* Graph 1 on page 24 clearly shows visitation drops during low water years. Given the long term drought forecasts for the Southwestern United States, why are cutbacks to services not considered in this document?

The Business Plan lists on pg. 29 Table 12 the costs for different areas of federally managed rivers. The fine print at the bottom of the table notes: *“In calculating “cost per person per 25 river miles”, the San Juan average group size of eight people was used. Where application fees are charged, the table assumes one application per group was submitted. Where per person per day fees are charged, an estimation of approximately 15 river miles per day was used and rounded up to a whole day.”* Was eight people the group size used to calculate the other river fees per mile for all the other rivers listed? Was the average group size for each river used? Were other rivers that are longer or shorter pro-rated to a common distance per dollar? Were river days per dollar calculated? For example, the Colorado River in Grand Canyon National Park trip length is 18 days in the summer (Lee’s to Pearce), and is the maximum time period allowed for the 280 mile trip. Can you explain why 226 miles was used in Grand Canyon instead of the complete distance of 280 miles? Can you explain why dollars per night were not used?

In this same table, we note that this table does not justify the fees other agencies charge, nor does it represent apples to apples, but apples to pomegranates. Apples and pomegranates may look similar from 20 feet away, but on closer inspection, they are not the same. In a chart like this it would make much more sense to look at total costs per person and lottery application fees for total available miles, assuming a one person trip. If one uses 8 people as a group size, it may be the San Juan average group size, but may not be for other rivers. Fee structures that charge per night rates are not applicable since the San Juan is not following that structure. If we look at per person and application fees, for example, under the San Juan proposed fee schedule, an 8 person San Juan Trip going 84 miles would be \$30 per person plus .75 cents for the shared lottery fee. That is \$30.75 per person for 84 miles or .37 cents per mile. An 18 day summertime Grand Canyon river trip from Lee’s Ferry to Pearce Ferry, a distance of 280 miles, for a group of 16 people sharing the \$25 lottery fee (\$1.56 ea.) and flat \$100 per person fee, works out to a total of \$101.56 for 280 miles or .36 cents per mile or \$9 for 25 miles. This is compared to \$9.15 proposed per 25 miles of the San Juan.

If we were to look at a solo trip, under the San Juan proposed fee schedule, a one person San Juan Trip going 84 miles would be \$30 per person plus \$6 for the shared lottery fee. That is \$36 per person for 84 miles or .43 cents per mile. An 18 day summertime Grand Canyon river trip from Lee’s Ferry to Pearce Ferry, a distance of 280 miles, for one person paying the \$25 lottery fee and flat \$100 per person fee works out to a total of \$125 for 280 miles or .45 cents per mile.

Using a solo trip standard, Table 12 now looks like this:

**River Name - Permit and Application Fees -Trip Length- Cost for a solo boater per mile**

<b>Colorado-Cataract</b>	<b>\$50</b>	<b>93 miles</b>	<b>.54 cents/mile</b>
<b>Colorado-Grand Canyon</b>	<b>\$125</b>	<b>280 miles</b>	<b>.45 cents/mile</b>
<b>Colorado-Westwater</b>	<b>\$10</b>	<b>17 miles</b>	<b>.59 cents/mile</b>
<b>Green-Desolation/Gray</b>	<b>\$31</b>	<b>84 miles</b>	<b>.37 cents/mile</b>
<b>Rio Chama</b>	<b>\$11</b>	<b>42 miles</b>	<b>.26 cents/mile</b>
<b>Rogue</b>	<b>\$16</b>	<b>50 miles</b>	<b>.32 cents/mile</b>
<b>Salt</b>	<b>\$135</b>	<b>52 miles</b>	<b>\$2.70/mile</b>
<b>Yampa</b>	<b>\$200</b>	<b>71 miles</b>	<b>\$2.81/mile</b>

<b>San Juan (current)</b>	<b>\$18</b>	<b>84 miles</b>	<b>.21 cents/mile</b>
<b>San Juan (proposed)</b>	<b>\$36</b>	<b>84 miles</b>	<b>.43 cents/mile</b>

Two things are clear in the analysis of pg. 29 Table 12. 1) All agencies that manage rivers have patrol trips, maintain put-in and take out facilities and manage permit distribution programs. Beyond that, with fees ranging from .21 cents /mile to \$2.81/mile, there clearly is no rhyme or reason for the fees charged to recreate on ANY river. 2) A solo boater’s fees to raft the San Juan are set to double in this new proposed fee structure (for additional discussion on solo boating see comments for pg. 31)

Moving on, pg. 30 notes benefits to the local economy. Why does this Business Plan not look at or even attempt to compute how many dollars self-guided river runners bring to the regional economy? If fees are used as a disincentive to participate as mentioned above, how will this adversely impact the regional economy?

Page 31 notes: *“Lacking the option to cost share, the total fees for a solo boater floating the Sand Island to Clay Hills segment would jump from the current fee of \$18.00 to \$36.00 with the proposed Special Recreation Permit fee increase and application fee. However, it is fair for a party of one to pay the same application fee as a party of 25 because each application requires the same amount of service and costs the Monticello Field Office the same amount to process.”* While a party of one would still require the same minimal office work as a party of 25, isn’t the resource impact and facilities use of a party of one only 1/25<sup>th</sup> a party of 25? How can this Business Plan justify charging this solo boater, with the least impact, the highest fee increase?

On pg. 32, the Business Plan notes *“In 2011, BLM river rangers and volunteers contacted and performed compliance checks on 81% of the groups launching on the San Juan River. If fee rates were to stay the same, staffing would have to be reduced, resulting in less compliance checks and patrols.”* Of the groups who were checked for compliance, why did the Business Plan not mention how many groups checked were outside compliance? Without knowing this missing figure, one can only assume 100% compliance by river runners. Wouldn’t a high level of compliance mean less compliance checks are needed, not more?

The Business Plan notes on pg. 33 that *“A large quantity of trash is continuously washed down the San Juan River into the BLM managed river segment from communities and developments upstream. A reduction in staffing would likely lead to more trash accumulation between Montezuma Creek and Clay Hills, further impacting the environment.”* This information is presented after a photo of a boat full of trash on page 32 noting *“A BLM river ranger’s productive day of trash collection on the river”* Why not ask all river runners to remove trash when they find it, as is presently the case? What cost savings would be achieved if all river runners took over this trash patrol duty? We are confident that river runners would be pleased to help out even beyond the volunteer trash trips that are formally organized.

We also note that the section on *Socioeconomic Benefits, including Low-Income Populations* on page 33 states *“Maintaining the current fees would keep San Juan River trips more affordable for low-income visitors. However, excluding the cost of permit fees, river boating is still an inherently expensive recreational activity for both private and guided visitors.”* No data is

presented in this Business Plan on per day costs of self-guided river trips. What is the range of costs per day of a self-guided trip? Your data indicates commercial trips cost \$350 a night. How do you justify the statement that river boating is inherently expensive for self-guided river runners when you present no data to support this statement? The RRFW staff is aware of many boaters, including ourselves, who bought gear at low prices, especially used boats. The outlay for many is less than the price of a single commercial trip and the gear is used for decades. The less technical nature of the San Juan does not call for the latest-and-greatest equipment.

Finally, our request at the start of this letter for additional outreach to river runners about this fee increase is substantiated on pg. 33, which notes public outreach did not include a mailing to the 2012 self-guided San Juan river users that their fees are about to double. Why did you not at least send out a postcard to these individuals and notify them of this intended change?

We would like to thank you for taking the time to prepare a Draft Business plan for the San Juan River and we look forward to a detailed response to our many questions regarding this plan.

Sincerely,



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