

Public Comment Summary – San Juan River Fee Changes/Increases					
Comment Number		Supports	Opposes	Ambiguous or No Opinion	Summary/Excerpts
1	Gregory T. Allen		x		Thinks commercial users should bear a higher proportion of the operating costs. "Also in the socioeconomic assumptions it is stated that a 66% increase will not affect private users. As head of a household that has owned all necessary gear to navigate the San Juan for many years, the permit costs are actually a large portion of the cost of the trip. At \$60 more for a family of five I would call this substantial." Also thinks that current river patrols are excessive and wasteful.
2	Neil Nikirk			x	Ambiguous comment. States that he is "generally supportive" of fee increases as long as they don't become "excessive" (undefined) or required annually. Then goes on to skewer the numbers in the plan regarding commercial use and says he thinks commercial users are mis-reporting their revenue and not paying their share. Thinks this should be corrected before raising fees on individual users.
3	Brian Magee		x		Concerned that the San Juan is one of only three "family-safe" rivers that he can take his young children on. Thinks the current level of "service" by river patrols is excessive and the San Juan is "over-policed." The Plan does not address significant needs at Mexican Hat and Clay Hills. Presents several alternative ideas that BLM could use to address revenue shortfalls in low-water periods.
4	Robert Nickel		x		"\$30 a person is pretty steep when you consider how hard it is to get people to commit in January to a trip in June. I've had everyone bail on trips and got stuck with a \$200+ permit."
5	Stacy Jourdain		x		"Five years ago I took my four sons and had the greatest time ever, I would like to keep doing that for the next 50 years. So please leave it alone and allow us to continue camping and enjoying it for the next 50 years."
6	Patrick Mingus	x			Entire comment: "I am in support of the Draft Business Plan for the San Juan River. The proposed changes in both the fees and lottery system make good sense."
7	Alan Palumbos	x			"I feel the rate adjustment is not only acceptable, but necessary to preserve the quality of the area."
8	Richard La Jeunesse	x			Entire comment: "I am in favor of the proposed business plan including the raising of fees to the point necessary to properly manage the resource and limiting use so that the river will be preserved."
9	Troy Wikle		x		Increases will drive people away to other places where they can enjoy recreation for free; the fee increases may not result in the revenue increases projected because of these diverted visitors. Suggests that BLM spending is excessive and they are beholden to special interests at the expense of ordinary people.
10	Nathan Wynn		x		Sarcastically suggests that instead of "minuscule" fee increases the BLM charge \$6,000 per person, which would ensure that only the "richest of the rich would be allowed on the river, which is of course all the best people anyway."

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11	Glen Berry	x			"I am more than happy to pay the additional fees proposed, as I know that the money is used for a good and important purpose."
12	Joe Griffith & Diane Donovan	x			Suggest that the fees should be increased even more.
13	Peter Wiechers		x		River running does not require developed amenities, which actually detract from the experience while adding to maintenance costs. River running is not a "specialized" use as defined in the FLREA and should not require a fee. The photo in the plan of a river ranger's load of trash does not depict trash left by river runners.
14	Kitty Benzar, Western Slope No-Fee Coalition		x		The BLM is not a "business" and should not be producing "business plans." Expecting user fees to fully cover the cost of providing public services is not in accordance with BLM policy. There is confusion in the plan as to what type of fee under the three FLREA categories is being charged. Establishing a slush fund of more than a year's worth of fee revenue is not in accordance with either GAO guidance or BLM policy. The socioeconomic impacts of fees are understated in the plan because rafting equipment has a long useful life and is affordable to those of low or modest income. The current system seems to be working well and the case for change is not convincing. The public comment period was too short and river visitors did not receive adequate notification.
15	Norman R. Henderson (retired NPS river recreation manager)		x		The fee plan is not supported by a comprehensive management plan, as required by BLM policy. It is also not in compliance with the FLREA. There are other needs on the San Juan with higher priority than those addressed in the plan. The plan is in conflict with the 2008 Monticello RMP. Pricing permits so as to make the San Juan program self-funding is contrary to BLM policy that fees should supplement, not supplant, appropriated funding.
16	Gary Ekker	x			Wants fee revenue to "more closely cover the costs" of managing the river. Happy to pay an application fee.
17	Kurt & Rita Larsch	x			Support application fee but think it should be credited toward the permit fee for successful applications.
18	Wayne Ranney		x		The failure to address substandard conditions at Clay Hills makes the plan "laughable" and it should be put on hold until these are fixed.
19	Craig Carter		x		Comment period was too short and ill-timed. The services provided are excessive to the needs of river-runners. Plan will exclude lower-income people. Reservations should be done through recreation.gov because people are familiar with it.
20	Don & Anne Webster		x		If fees are to be increased, then problems at Clay Hills, with tamarisk crowding out campsites, and with joint permitting (BLM, Navajo, NPS) should be addressed. The plan does not do anything to fix any of these problems.

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21	Jo Johnson, River Runners For Wilderness		x		7-page letter. Comment period was too short, ill-timed, and did not reach many river users. The plan is not clear as to whether there are separate fees for permits and for use of the Sand Island facilities. It is also confused as to who pays fees among day users and commercial users. "Private" rafters are really "do-it-yourself" rafters who need few services from the BLM, but they are being asked to pay more while commercial rates stay the same. Significant information is missing from the plan. Questions about how visitation was calculated and how the projected impact of fee changes was determined. Fees should not be used to decrease visitation, BLM should be encouraging outdoor activities. The plan is contradictory as to whether visitation is increasing or not. If funding is being cut, then services should be cut as well, for example by reducing volunteers to just the busiest months of the season instead of gearing everything to 6 months. The comparison of the San Juan fees with other rivers is not apples to apples, it is "apples to pomegranates." The San Juan needs fewer compliance checks, not more, due to high levels of compliance. Requested response to many specific questions, which was not honored.
22	Robert Ludwig	x			Fees are warranted and should be looked at for increase every two years.
23	Laura Halfman, emergency physician and professional river guide		x		Fees will discourage use and make it more difficult.
24	Dave Nally		x		"I vote NO to any new fee increases."
25	Denis Stratford		x		"Management of the San Juan River is an example of poor, overreaching, short sighted and self-defeating river management."
26	Nick Probst	x			Agrees with the changes but would like to see the number of private launches increased.
27	Rick Schoen		x		BLM has not demonstrated that they are operating as efficiently as possible before increasing fees.
28	Ann Walka		x		Outreach to river users was inadequate. "It's difficult to imagine a 'business plan' for a river." Plan does not address the most pressing needs. "My experience would not be at all improved by more facilities or permittee policing by rangers."
29	Joseph J. Walka		x		The plan has the wrong priorities, it's too focused on Sand Island. Lists several needs that should be higher priority.
30	Dan Huisjen	x			Supports proposal as drafted.
31	Brian Brown		x		"The plan seems to think that the silver lining in higher fees is it will discourage applications/users. Which is it . . . Private boaters have more money and will not be affected, or they will be discouraged by higher fees?"
32	Steve Krest		x		Did not have time to thoroughly read the plan, but concurs with the Benzar comment letter.

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33	Theresa Butler (Moab Rafting and Canoe Company, a permitted commercial user)	x			"Commensal [sic] River launches" require less work from the BLM. "Not increase [sic] this fee for the 'commercial River launches' would allow with helping the commercial company with bookings. And in hope for more revenue for the BLM visitors taking river trip with companies that providing equipment, crew that have knowledge of the river, ability to travel the river explaining ethic, river safety, 'leave no trace' along with having certified (licensed, first aid../CPR, river rescue, trained. Etc) I could go on and well [sic] if needed. Feel free to call. But please do not increase on the commensal [sic] outfitters."
34	Rip Harwood		x		Opposed unless access to the river by cows is curtailed.
35	Anne Markward		x		Sees some good aspects but disagrees with the plan's assumptions and wants cows eliminated.
36	Zack Harmer			x	"The majority of the proposed changes are for the better, but many elements of the plan require certain adjustments."
37	David Smallwood			x	Unable to submit complete response due to only ½ day notice of comment period deadline.
38	Eric Burris		x		Something is not right when a cow/calf pays \$1.35/month and damages archeological sites along the river but a river runner is charged \$6 per person per day.
39	Timothy Lahey		x		"PLEASE don't put another nail in the coffin of the San Juan River's accessibility by over regulating and excessive permit fees, drought conditions, low water, and sediment migration are limiting factors enough."
40	Martin Zemitis		x		(5-page letter) "Raising user fees will not solve the larger problems facing boaters or the BLM's management of the lower section of the river." Suggests several problems on the river that are higher priority than raising fees but are not addressed in the plan. "I see nothing in the San Juan Business Plan that benefits boaters." Sand Island is overbuilt because of fees. The plan will have negative impacts on boaters, the local economy, and the environment. Cost of boating is understated in the plan because BLM only manages one side of the river.
41	Robert Southwick		x		Does not oppose application fee but strongly opposes increase in permit fee. Development at Sand Island has detracted from the river experience, not improved it. "As far as I am concerned the increased fees will only increase the bureaucracy and maintenance headaches."
42	David Snearly		x		Identifies several management issues that are higher priority than fee increases but are not addressed in the plan. "For the cost of this 'Business Plan' a double-vaulted toilet could have been built by now."
43	Jenny Russell & Clay Wadman		x		Concurs with Benzar comment, with added thoughts. Disagree that another toilet is needed. Other management issues on the river are more important but are not addressed in the plan.

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44	Karla VanderZanden (Co-founder and Director, Canyonlands Field Institute, a permitted commercial user)		x		The River Management Plan should have been completed before recommending "piecemeal" changes to fees. These large increases will create a barrier to participation by their clientele, which is largely school children on educational trips and Navajo youth groups. BLM should be coordinating with BuRec and Navajo Nation to provide joint permitting and sufficient water for floating. Cost cutting should have been studied before jumping to fee increases. Labor costs shown in the plan are too high and should be cut. Several suggestions for improving participation in the volunteer program. The adobe contact station is not needed and should be converted to a nightly recreation rental.
45	Natalie Reed	x			Without money other problems get worse.
46	Amber Everett	x			"Although \$10, \$20, and \$30 does seem quite high for recreational fees I feel it may be the only way to maintain and operate the recreation that everyone enjoys at San Juan River."
47	Jonathan Belnap	x			Supports increase mainly because it will reduce use and provide more ranger policing for trash.
48	Kristen McKibbon (owner, Wild Rivers Expeditions, a permitted commercial user)	x			Although "in general" she supports the proposal, the 5-page letter goes on to criticize BLM for doing a fee proposal without first adopting a River Management Plan, not involving frequent users and other interested persons in their planning decisions, and not accommodating commercial users suffering from insufficient launch dates. Also points out several factual errors in the plan and questions many of the assumptions on which it's based.
49	Chandler Dean	x			Supports increases because the river is not successful unless it makes a profit.
50	Rachel Young	x			Supports increases but wants the money spent on ecological improvements, not visitor services.
Total Support/Oppose/Ambiguous		17	30	3	