

Anchorage Field Office Special Recreation Permit Program Business Plan

A strategy for fee collection and expenditure in compliance with the
Federal Lands Recreation Enhancement Act P.L. 108-447, enacted December 8, 2004.

WBS # LVRDAK060000, LVRDAK080000, and LVRDAK130000



United States Department of the Interior
Bureau of Land Management, Alaska
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Anchorage Field Office
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**Business Plan for
BLM Anchorage Field Office Special Recreation Permit Program**

PREPARATION, RECOMMENDATIONS, REVIEWS, and APPROVALS

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This business plan was prepared pursuant to the "Federal Lands Recreation Enhancement Act, 2004" (P.L. 108-447) and the BLM recreation fee program policy. It establishes future management goals and priorities for the Special Recreation Permit program in the Anchorage Field Office.

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Business Plan for
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Executive Summary

The Bureau of Land Management (BLM) Anchorage Field Office (AFO) prepared this recreation fee business plan pursuant to the Federal Lands Recreation Enhancement Act (FLREA) of December 2004 (P.L. 108-477, as amended). The BLM originally began collecting fees for the recreational use of public lands under the authority of the 1976 FLREA – known as the “organic act”. FLREA recognizes the BLMs authority to collect Special Recreation Permit (SRP) fees for the recreational use of certain areas. FLREA allows collected SRP fees to be retained locally, outlines how revenues may be used, and identifies specific limitations on SRP fees. Collected revenue is used for benefits and services such as facility repair, maintenance, enhancement, interpretation, visitor information and services, visitor needs assessments, signs, restoration, law enforcement related to public use and recreation, and operating or capital costs directly associated with the recreation fee program.

FLREA guidelines require that each fee program have a business plan which thoroughly discusses fees and explains how fees are consistent with the criteria set forth in the Act. Business plans are to assist management in determining the appropriateness and level of fees, cost of administering fee programs, and provide a structured communication and marketing plan. The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fees in AFO. The AFO SRP Fee Business Plan is AFOs official documentation in the event of an audit. In the AFO, western Alaska outfitter and guide, heliskiing, and other SRP activities are deposited in the LVRDAK060000 (AK06) account. SRP activities taking place in the Campbell Tract Special Recreation Management Area (SRMA) are deposited into LVRDAK080000 (AK08), and SRP activities taking place on the Iditarod National Historic Trail SRMA are deposited into LVRDAK130000 (AK13).

1. Introduction

a. Background and Authorities

The authorities and regulations for this business plan are:

- **The Federal Land Policy and Management Act of 1976 (FLPMA), as amended**, [Public Law 94-579] contains BLM’s general land use management authority over the public lands and establishes outdoor recreation as one principal use of those lands. Section 302 (b) of FLPMA directs the Secretary of the Interior to regulate through permits or other instruments the use of the public lands. The BLM originally began collecting recreational fees for the use of public lands under this authority. Section 303 of FLPMA contains the BLM’s authority to enforce the regulations and impose penalties.
- **The Federal Lands Recreation Enhancement Act (FLREA) 2004** [Public Law 108-447] repealed applicable portions of the Land and Water Conservation Fund Act and replaced the BLM’s authority to collect recreational fees. The FLREA provides the BLM the authority to establish, modify, charge, and collect recreation fees at federal recreation lands and waters that meet certain requirements. The FLREA also allows the BLM to keep the fee revenues at the local offices where they are collected and directs how the BLM will manage and utilize these revenues, including for expenses such as facility repair, maintenance and enhancement, interpretation, visitor information, services and needs assessments, signage, law enforcement directly related to public use and recreation, and operating or capital costs associated with the Recreation and Visitor Services program. The FLREA also established the America the Beautiful–The National Parks and Federal Recreational Lands Pass program. The FLREA is codified in the U.S. Code in Title 16 (Conservation), Chapter 87 (Sections 6801-6814).
- **43 CFR 2930: Permits for Recreation on Public Land.** The Code of Federal Regulations (CFR) is an annual codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government. Title 43 covers public lands administered by the Department of the Interior. Sections 1000 – 9999 cover the Bureau of Land Management.
- **The National Trail Systems Act (NTSA) 1968, as amended [Public Law 90-543]** Section 5-7 authorizes and designates the Iditarod a National Historic Trail, administered by the Secretary of the Interior.

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

- BLM Recreation Permits and Fees Manual 2930
- BLM Recreation Permits and Fees Administration Handbook (2930-1 Handbook)

b. Business Plan Requirement

The BLM strives to manage recreation and visitor services to serve diverse outdoor recreation demands while maintaining the sustainable resource conditions needed so recreation opportunities remain available. The BLM's goals for delivering recreation benefits from BLM-administered public lands and waters to the American public and their communities are to:

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

This business plan will assist the AFO in meeting these recreation and visitor service goals.

According to BLM Handbook 2930-1, Recreation Permits and Fees (Rel. 2-300, dated November 17, 2014), each recreation fee program must have an approved business plan which comprehensively explains fees and illustrates how they are consistent with the FLREA fee criteria. Business plans assist management in the determination of the appropriateness and level of fees, the cost of administering a fee program, the expected benefits provided for the public, and to produce a structured communication and marketing plan.

This business plan will encompass descriptions of the fee sites, proposed fee changes, associated operating costs, financial analysis, and the impacts of the fee changes. This report utilized data from internal BLM tracking and accounting mechanisms such as the Recreation Management Information System (RMIS), Collections and Billings Systems (CBS), Federal Business Management System (FBMS), and other locally generated recreation and visitor use tracking spreadsheets. Some data contained in these systems may be subject to the requirements of the Privacy Act of 1974.

Under guidance of BLM Manual 2930, public review and consultation with the Recreation Resource Advisory Committee are not required for SRP business plans as the fees for these types of permits are collected according to a national fee schedule. BLM AK is also one of only two western states in which the Governor opted to not establish Recreation Resource Advisory Committees. This business plan will be posted on the BLM.gov recreation fees and business plan public website.

Under FLREA, fees are divided into different accounts, based on their revenue source. The AFO currently has three separate treasury accounts, all of which are for SRPs. The separate accounts allow the AFO to track and account for fees collected throughout the field office.

Under certain conditions, BLM is authorized to require SRPs to pay costs related to processing and managing their permit. These funds are deposited into separate individual accounts specifically set up for each permit and are not considered public fee revenues. Their expenditure is accountable directly to the SRP holder and is guided by SRP regulations and policy in 43 CFR 2932.31(e) and BLM handbook H 2930-1 Recreation Permit Administration, sections III.G.1 and III.H.1 (2014). This business plan is not applicable to either SRP cost recovery or amenity fee accounts. The recreation fee revenues described within this business plan are derived from the issuance of SRPs at the AFO.

Management of recreation resources within the AFO is guided by the following land use plans:

- Campbell Tract Travel Management Plan (Decision Record February 2024)
- Campbell Tract Recreation Area Management Plan (Decision Record 2022)

- Bering Strait-Western Interior (BSWI) Resource Management Plan (RMP) (2021)
- Ring of Fire RMP (2008)
- Kobuk-Seward Peninsula RMP (2006)
- Iditarod National Historic Trail Comprehensive Management Plan (1986)
- Unalakleet Comprehensive River Management Plan (1983)

c. Environmental Justice

Consistent with Department of Interior and BLM priorities, the BLM AFO seeks to achieve environmental justice, equity, diversity, inclusion, and accessibility and make a difference in Alaskan communities through expanding recreational access and opportunities and providing for natural resource interpretation. This includes to:

- encourage, facilitate, and improve partnership with and access for youth, tribes, and underserved communities to public lands through recreation partnerships and collaborations;
- improve public health and safety at developed recreation sites and areas by updating and modernizing infrastructure—including meeting accessibility standards for people with disabilities;
- invite education, interpretation, and recreational access for all Americans, especially for diverse populations and those near urban areas to encourage enjoyment of BLM-managed public lands and waters;
- collaborate with community members, government organizations, nonprofit organizations, academic institutions, and other stakeholders to address environmental and health-related challenges for recreation management;
- enhance understanding of environmental and health-related issues at the community level;
- improve methods for identifying, addressing, tracking, and measuring progress toward achieving environmental justice;
- and develop and support youth education and outreach programs.

2. Recreation Program Overview

a. Administrative Unit

The AFO, within the Anchorage District Office (ADO), manages 23.6 million acres of public lands, making it the largest BLM field office in Alaska and the country. These lands extend from Southcentral and Southwest Alaska, north and west to the Bering and Chukchi Sea coasts and are largely roadless and undeveloped. This acreage includes an incredible diversity of lands and uses from urban to rural, from road accessible to remote, and from recreation to resource development. This area is home to more than 100 tribes and Alaska Native organizations, which are important partners in public land management. Notable recreation opportunities include floating the Unalakleet Wild and Scenic River (WSR), visiting the Iditarod National Historic Trail (NHT), and using the extensive trail network on Campbell Tract in Anchorage.

Image 1. Helicopter in Kigluaik Mountains on the Seward Peninsula.



The Campbell Tract Special Recreation Management Area (SRMA) consists of 730-acres of BLM administered public land located in the heart of Anchorage, which provides year-round outdoor recreation opportunities in a natural setting for nearly 500,000 urban visitors annually. The SRMA currently hosts a 24-mile nonmotorized trail system that supports recreation activities including walking, running, mountain and fat tire biking, orienteering, horseback riding, Nordic skiing, sled dog mushing, skijoring, nature study, and wildlife viewing. Portions of the trail system includes a 3.8-mile Campbell Tract Loop, which is part of the National Recreation Trail system. Numerous public volunteer events and permitted races and activities occur every year, providing additional recreation opportunities to the public and continuing the BLM’s commitment to offering a wide variety of recreation opportunities to a diverse audience.

The Iditarod NHT is comprised of a 1,000-mile main trail between Seward and Nome, and an additional 1,400 miles of side/connecting trails that link communities and historic sites. The BLM works with partners to maintain and promote the historic qualities that make the Iditarod unique among NHTs. As the designated trail administrator, BLM facilitates efforts by volunteers and local, state, and federal agencies on behalf of the entire trail. BLM maintains approximately 120 miles of the trail, including five public shelter cabins. The trail segments that cross BLM-managed lands are managed as part of BLM’s National Conservation Lands and within the BSWI RMP are designated as an SRMA. Permitted uses include the Iditarod Trail Sled Dog Race, Iron Dog snowmobile race, Iditarod Trail Invitational Ultra Marathon-for human-powered activities, and eco-tourism events.

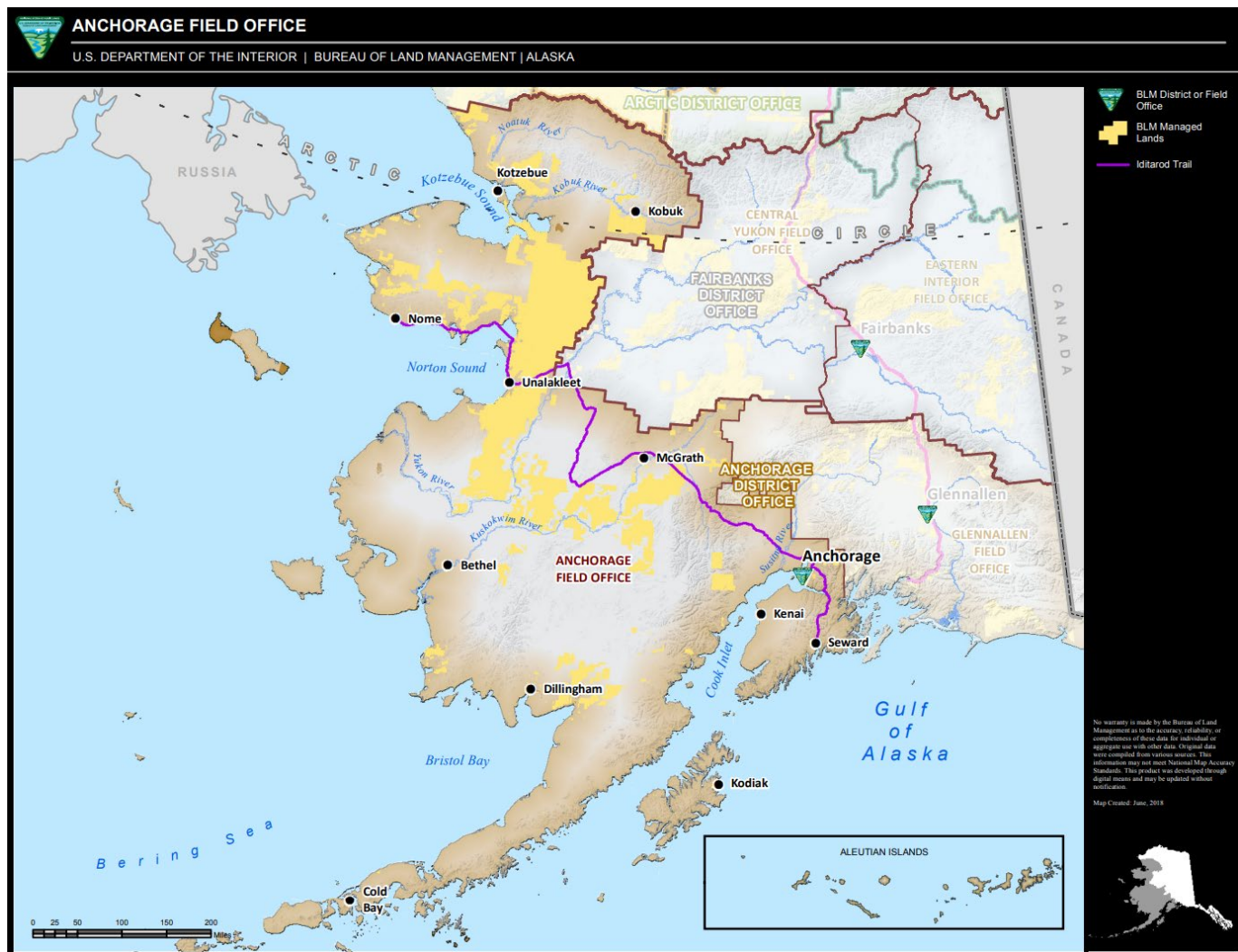
The Squirrel River SRMA includes approximately 655,000 acres of BLM lands located 30 miles northeast of Kotzebue. The nearby communities of Kiana, Noatak, Kotzebue, and Noorvik use the area for

subsistence, and it provides personal and commercial recreation activities to the public. The Squirrel River SRMA provides subsistence and sport hunting opportunities for caribou and other big game, which has been the primary use for several permit holders in the AFO. Due to declines in the population of the Western Arctic Caribou herd, the area has been closed to sport hunting of caribou on Federal Lands since 2018. In 2022 this closure was expanded to also include to ban sport hunting of moose. These closures have been implemented by the Federal Subsistence Board.

b. Recreation Resources

SRP’s are issued on a discretionary basis to manage use of BLM-administered public lands for recreational, commercial, competitive, and organized group activities and events within the AFO. The setting for these recreational SRP activities and events is in the AFO boundary displayed in Image 2 below. These lands are accessible year-round to a variety of users.

Image 2. Map of AFO boundary.



The AFO boundaries include the following BLM-administered recreation resources and sites:

- Unalakleet WSR

- Campbell Tract SRMA
- Iditarod NHT and SRMA
- Iditarod NHT Public Use Cabins (Bear Creek, Tripod Flats, Old Woman, Foothills, Rohn SRMA)
- Knik SRMA
- Squirrel River SRMA
- Salmon Lake Campground
- Neacola Mountains Area of Critical Environmental Concern (ACEC)

Primarily, AFO public land is used by local and regional residents, though activities that are conducted under SRPs often cater to non-resident U.S. citizens and international visitors. These clients rely on the expertise of local and regional guides/outfitters to help them realize the most satisfaction from their visit.

Hunting outfitters and guide services are frequently local guides used by out-of-state residents unfamiliar with the area who do not have the local knowledge and means to complete a hunt individually. Outfitters usually provide full-service guiding which includes transport to a location, equipment, camping accommodations, and meals. Clients benefit from outfitter services by learning new outdoor skills, access to remote locations, and perhaps feeling a sense of accomplishment in tracking and harvesting game.

Environmental education services are usually local organizations that host events or trainings designed to provide educational opportunities on the environment or outdoor survival skills. They generally serve a variety of audiences, including residents and youth.

Skiing services include heliskiing, guided backcountry skiing, and Nordic ski races, and attract participants from around the world. Heliskiing and backcountry ski guides generally provide clients lodging accommodations, helicopter time, and guiding on ski runs. Nordic ski races in the AFO provide unique terrain to participants.

In addition to commercial services provided by guiding operations, the AFO also receives permit applications for competitive events including the Iditarod Trail Sled Dog Race, Iron Dog snowmobile race, and Iditarod Trail Invitational Ultra-Marathon. Other recreational pursuits by both residents and non-residents on BLM public lands within the AFO include dog mushing, mountain biking, winter fat tire biking, orienteering, racing, and hiking.

c. Demographics

The AFO attracts a wide variety of visitors. Most visitors to the AFO are from Anchorage or Matanuska-Susitna Boroughs. Visitors to Nome Field Station service areas are primarily from Nome and neighboring communities. In addition to use from local communities, several sites in the AFO attract a wide range of visitors from locations across the nation and internationally.

The following information was compiled from United States Census Bureau data and State of Alaska Labor Department and Workforce Development – Research and Analysis data.

The state of Alaska has a population of 733,391 people with 291,247 living in the Municipality of Anchorage and 107,081 in the Matanuska-Susitna Borough. Anchorage is the most populous city in Alaska and has the highest population density, 170 people per square mile. The population of Nome census area is 9,492 and has a population density of .4 people per square mile.

Alaska is the twelfth most diverse state in the United States. Anchorage has a diversity index of 66.7%, meaning it ranks in the top fifteenth percentile for diversity in the nation and has three of the most ethnically diverse neighborhoods in the country, according to 2013-2014 census data.

The median household income for the state of Alaska is \$77,790 (2016-2020) with 10.5% of the population living below the poverty level. The state’s median age is thirty-four with 47.6% of the population being female. Alaska is racially composed of 64.5% Whites (non-Hispanic), 15.7% American Indians and Native Alaskans, 7.5% Hispanics or Latinos, 6.6% Asians, 3.6% Black or African Americans, 1.6% Native Hawaiians and other Pacific Islanders, and 7.9% two or more races.

The median household income for the Municipality of Anchorage is \$84,813 (2016-2020) with 8.8% of the population living below the poverty level. The median age is thirty-five; 24.3% are persons under the age of eighteen and 49.0% of the population is female. Anchorage is racially composed of 61.2% Whites (non-Hispanic), 9.8% Asians, 9.4% Hispanics or Latinos, 7.5% American Indians or Native Alaskans, 5.3% Black or African Americans, 2.9% Hawaiian or other Pacific Islander, and 11% of two or more races.

The median household income for Nome is \$63,977 (2016-2020) with 19.8% of the population living below the poverty level. The median age is 31.3; 34% are persons under the age of eighteen and 47.3% of the population is female. Nome is racially composed of 14.7% Whites (non-Hispanic), 1.6% Asians, 2.2% Hispanics or Latinos, 75.9% American Indians or Native Alaskans, .8% Black or African Americans, .2% Hawaiian or other Pacific Islander, and 6.8% of two or more races.

d. Visitation

AFO is consistently the most visited field office of the five field offices in Alaska. Due to its proximity to a municipal hub, facilities and recreation areas, and appeal to international visitors, it has had more than 370,000 visitors every year for the past five years. In fiscal year (FY) 2021, AFO estimates that more than 514,000 people visited recreation sites in the AFO. Table 1 shows the number of visits to the AFO and its percent of total visitation to Alaska.

Table 1. Recreation visits to AFO from FY2019-FY2023.

FY	AFO Visits	Percent of Total Visits in BLM Alaska
2019	416,784	42%
2020	490,354	47%
2021	514,417	48%
2022	476,567	49%
2023	415,789	45%

The Recreation Management Information System (RMIS) is the system the BLM uses to track visitor use on public lands. For RMIS, recreation visits are defined as visits which include the entry of persons onto lands or waters administered by the BLM for the pursuit of recreational experiences. For this business plan, “visits”, “visitors”, “visitor use”, “number of visits”, and “visitation” will all refer to the same measure – the number of people that have engaged in recreational activities or events on BLM-administered public lands, including “participants”. In this plan, there will be no distinction between the participants in an SRP

activity/event and the spectators - both will be considered “visitors”. This does not include “visitor day”- which is a measure of the amount of time spent on public lands.

In RMIS, the annual visitation from SRPs in the AFO in FY2023 was 6,377. Table 2 shows the RMIS numbers for the estimated annual recreation visits to the AFO over the past five years. FY2019-FY2023 included an irregularity of visitation in FY2019 and FY2020, due to the end of a previous permitting system and COVID-19 SRP travel restrictions, respectively.

Table 2. SRP visitation to AFO from FY2019 to FY2023.

FY	2019	2020	2021	2022	2023
Visitors	*26,316	5,820	5,020	5,926	6,377

*Prior to the Covid-19 pandemic in FY2020, SRP holder Trailside Discovery Camp generated high visitation numbers contributing to high visitation in FY2019. Trailside Discovery Camp no longer has an authorization with AFO.

RMIS figures are calculated estimates. They are based on field observations, participant and spectator numbers reported on SRP Post Use Reports, traffic counter data, and visitor use counts during holiday patrols and special events. In the AFO, each type of primary activity associated with every SRP has a unique formula to generate visitation estimates.

3. Permitting Program

a. Description

The AFO manages commercial, competitive, and organized group events on public lands through the SRP program, which is administered under the authorities and guidance listed previously. SRPs are required for the following types of activities/events and are issued with stipulations deemed necessary by the BLM to mitigate impacts to the natural and cultural resources of public lands.

- **Commercial/Vending:** any activity, service, or use on public lands where a person, group, or organization makes or attempts to make a profit, receive money, or obtain compensation from participants; charges a fee; and/or pays for public advertising to seek participants. Some permitted commercial activities within the AFO include hunting outfitters, environmental education, and dog mushing.
- **Competitive:** any organized, sanctioned, or structured use, event, or activity on public land in which two or more contestants compete. SRPs for competitive events include foot racing.
- **Organized Group Events:** activities on the public lands that are part of a structured, ordered, consolidated, or scheduled event for recreational use that is not commercial or competitive. Permitting organized group events enables community groups to recreate together on their public lands. Organized group SRPs in the AFO include dog mushing, mountain biking, and orienteering.

b. Fee Description

The SRP fee schedule for permitted activities is established nationally for all BLM field offices and the AFO does not have the authority to change this. Fee receipts derived from commercial, competitive, and organized group event SRPs are routinely calculated using national fee schedule guidance found in BLM

Recreation Permit Administration Manual H-2930-1, Section III.G. As of November 2014, this schedule includes the following, adjusted with the most recent fee update published in the Federal Register as of May 2023.

Table 3. National SRP fee schedule.

Type of Permit	Minimum Annual Fee – greater of \$130 or the following:	Cost Recovery Fee
Commercial or Vending	3 percent of adjusted gross receipts, plus any applicable assigned site fee and/or exclusive use fee, plus any applicable Special Area fee, plus cost recovery, including application fees.	If cost recovery applies, the BLM charges cost recovery plus the SRP fees.
Competitive	\$7/participant/day, plus any applicable exclusive use fee, plus any applicable Special Area fee, plus any applicable application fees.	If cost recovery applies, the BLM charges the greater of the SRP fees or cost recovery.
Commercial and competitive	The greater of the commercial fee or the competitive SRP fee, plus any applicable assigned site fee and/or exclusive use fee, application fees, and Special Area fee.	If cost recovery applies, the BLM charges cost recovery plus the SRP fees.
Organized group	\$7/person/day, plus any applicable exclusive use fee, plus any applicable Special Area fee, plus any applicable application fees.	If cost recovery applies, the BLM charges the greater of the SRP fees or cost recovery.
Assigned site fee (commercial only)	\$260/site/year.	N/A
Cost recovery	Full cost recovery is required if the permit involves more than 50 hours of staff time.	N/A

There are also other fees that may apply. The complete fee schedule is in Appendix A and outlined in the manual section available for review at the AFO.

Fee Determination

The AFO takes the following actions when calculating fees:

1. Determines gross receipts by totaling all payments received, regardless of source, by the permittee for goods or services provided in connection with SRP-authorized commercial activities on public lands and related waters (including booking fees, nonrefunded deposits, and cancellation fees),
2. Adjusts the total gross revenue by subtracting allowable deductions for transportation and lodging, if any,
3. Multiplies the adjusted total by 0.03 (3 percent of adjusted gross receipts is the commercial SRP fee as of March 2014),
4. Adjusts the SRP fee derived in Step (3) above by applying any appropriate discount for nonpublic land use. The BLM ensures that there is no overlap or double deduction with transportation costs,
5. Subtracts prepaid fees from the total amount of fees due to arrive at the balance due the BLM.

Fee Discounts

A discount of SRP fees for time off public lands and related waters may be appropriate for commercial, competitive, or group events. A discount is allowed for time spent off public lands and related waters from the time and date of entry to the time and date of exit from public lands. Detailed trip logs are required by the permit holder to corroborate the discount off BLM lands they are requesting. To determine the time off public lands successfully, the AFO reaches an agreement with the permittee, before issuing the permit, when and where the trip or event starts and ends. A ‘trip’ is the time the participant spent with the permittee that starts either after the first night’s lodging or when the client begins participating in the advertised use. For example, if the permittee advertises the trip as a 5-day hunt, the ‘trip’ is considered one 5-day hunt. A trip ends when the participant returns to the permittee’s headquarters or lodge for the last night’s lodging. For time spent on nonpublic lands, the authorizing officer may require the permittee to submit a signed trip log or operating plan specifying this nonpublic land use. When equitable, miles or acres may be used as a substitute for time in determining the discount. When time off public lands occur on land administered by another federal agency that uses similar fee and discount schedules, fee calculations are coordinated so that duplicate fees or overcharges do not occur. Commercial permittees who rent equipment, shuttle vehicles, or deliver and pick up customers on public lands and related waters are not eligible for this discount.

Cost Recovery

If more than 50 hours of staff time are required for processing, administering, and monitoring a permit, the BLM charges cost recovery of direct expenses related to the permit. If the 50-hour cost recovery threshold is exceeded, recovery of costs begins with the first hour. The cost recovery charge is based on the actual personnel, vehicle, travel, and materials costs required to issue, administer, and monitor the SRP. When cost recovery is required, the authorized officer notifies the applicant of potential charges in writing within 30 calendar days of receipt of the application. Further work on the project, e.g., an environmental assessment, may not begin until the BLM receives cost recovery fees.

Cost recovery charges are often associated with new or substantially different activities or events and are levied to compensate the government for the costs of authorizing and administering the new use. Cost recovery fees are also likely to be applicable to short-term uses that require environmental analysis, on-site monitoring, and permit enforcement. These fees are based on the actual personnel, vehicle, travel, and material costs required to issue, administer, and monitor the SRP. For example, a cross-country race may require an environmental analysis team, field trips to assess the potential route, law enforcement, and monitoring at specific sites along the route. Cost recovery charges are not assessed for conducting routine business with permittees or for long-term monitoring.

c. Permit Types and Numbers

From FY2019-FY2023, the AFO administered an average of 47 permits annually. Table 4 shows the number and type of SRPs administered each year. Many SRP holders are issued multiple year permits which, in addition to new SRP applications, require administration each year the permit is active. Some events are considered commercial and competitive, such as dog mushing races. In such instances, the event may be charged commercial or competitive use fees and generally, the higher fee is charged and considered as such. Fees will be addressed in further sections.

Table 4. SRPs issued by permit type and year.

SRP Type	FY2019	FY2020	FY2021	FY2022	FY2023
Commercial Use	43	40	40	42	41
Competitive	3	1	0	0	0
Organized Group	5	5	5	4	4
Total	51	*46	45	46	45

*FY2020 decrease was due to COVID-19 travel restrictions into rural point to point Alaska village locations

SRP holders in the AFO offer a variety of outfitter services, including guided hunting services, guided hiking services, outdoor education tours, horseback riding, shuttle services, dog mushing tours, heliskiing, and cross-country skiing. Organized events include mountain biking, dog mushing, hiking, and orienteering. Competitive events include long distance winter overland events—sled dog racing, snowmobile racing, winter biking, cross country racing, and running events. Table 5 shows the total number of permits administered by primary activity attributed to SRPs from FY2019 – FY2023. Most permits administered are associated with big game hunting.

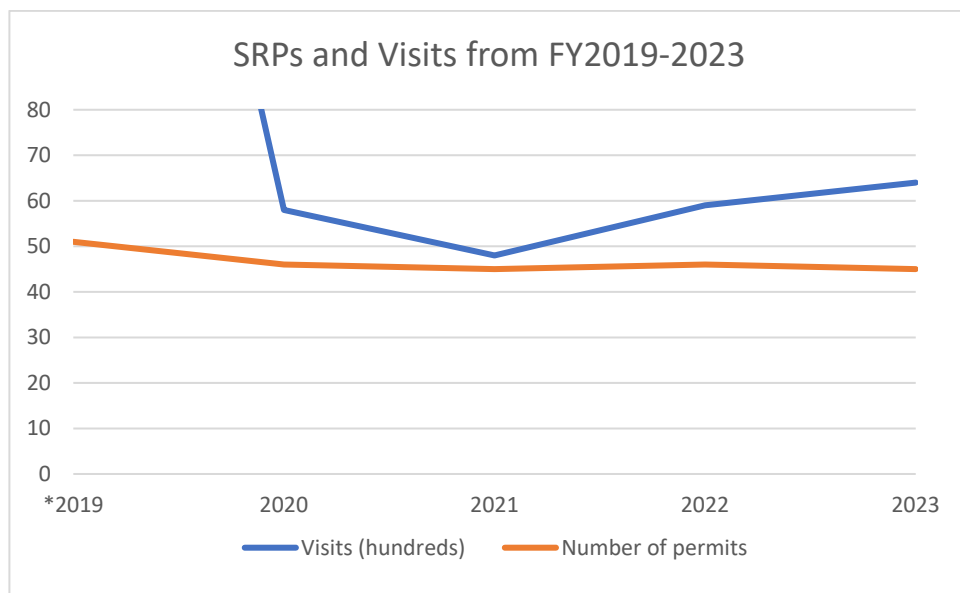
In FY2023, SRPs in the AFO were primarily commercial use in outfitter services for hunting and a variety of other activities, listed below. Four organized group permits are used for mountain biking, dog mushing, and orienteering. Three permittees primary use is considered unspecified but are primarily air transporters for big game hunting. They do not conduct outfitting or guiding services but only supply air transport to hunters.

Table 5. Total SRPs administered by year and primary activity.

Primary Activity	FY2019	FY2020	FY2021	FY2022	FY2023
Archery	2	2	2	2	2
Bicycling - Mountain	2	2	2	2	2
Camping	1	1	1	1	1
Dog Mushing	4	4	4	3	3
Environmental Education	2	2	2	2	2
Heliskiing	2	2	1	1	1
Hiking, Walking, Running	1	1	1	0	0
Hunting - Big Game	24	21	22	26	24
Orienteering	1	1	1	1	1
Racing - Adventure	3	3	3	3	3
Racing - Bicycle	1	1	1	1	1
Racing - Foot	2	2	1	0	0
Skiing - Cross Country	1	1	1	1	1
Skiing - Downhill	1	1	1	1	1
Snowmobiling	1	0	0	0	0
Specialized Sport	1	0	0	0	0
Unspecified	2	2	2	2	3
Total	51	46	45	46	45

Figure 1 below shows both visitor use and the number of permits administered from FY2019-FY2023. In FY2019, visitor use from Trailside Discovery Camp caused a significant spike in visitation but otherwise, the overall trend is upward. There are a variety of factors that influence visitation and SRP usage in the AFO, including hunting and fishing regulations, access restrictions to rural communities, the Covid-19 pandemic in FY2020, and more. Though variable from year-to-year, the SRP program has continued to grow from FY2019-FY2023.

Figure 1. Number of SRPs administered and visitor use from FY2019-FY2023.



*Prior to the Covid-19 pandemic in FY2020, SRP holder Trailside Discovery Camp generated distinctly high visitation numbers contributing to high visitation in FY2019. Trailside Discovery Camp no longer has an authorization with AFO.

Various data sources exist for tracking SRP data, and inadequacies between cross-platform compilation may cause discrepancies for actual number reporting. Of particular importance is the inconsistent entry of SRP data in RMIS each year – making RMIS data unreliable as a sole data source. Data was augmented by information from SRP case files and CBS reports.

4. Financial Analysis

a. SRP Fees

Fees for SRPs are set through national BLM policy and regulation for all BLM field offices by the BLM director. This is completed in accordance with a three-year fee adjustment policy published in the Federal Register on October 19th, 1989 (54FR 42998). For the five years covered under this plan, the minimum SRP fees were as shown in Table 6.

Table 6. Minimum SRP fees by year.

FY	2019	2020	2021	2022	2023
Minimum SRP Fee	\$110	\$115	\$115	\$115	\$130

All SRP fees are deposited into separate recreation fee revenue accounts, as established by each BLM office. In the AFO, SRP fees are deposited into accounts LVRDAK060000 (AK06), LVRDAK080000 (AK08), and LVRDAK130000 (AK13). Accounts AK08 and AK13 were created in FY2022 to improve tracking of regional funds within the AFO. Though they were available to deposit funds into in FY2022, no revenue was separated to those accounts until FY2023. The breakdown of those funds and total fees collected from FY2019-FY2023 are in Table 7 below.

Table 7. SRP revenue by year in SRP accounts.

	FY2019	FY2020	FY2021	FY2022	FY2023	5-Year Average
*AK08	N/A	N/A	N/A	\$0	\$4,810	
*AK13	N/A	N/A	N/A	\$0	\$21,661	
AK06	\$102,102	\$90,399	\$34,260	\$72,463	\$49,748	
Total Fees Collected	\$102,102	\$90,399	\$34,260	\$72,463	\$76,219	\$75,089

*Accounts AK08 and AK13 were created in FY2022 and were not available to deposit funds into in years prior. The accounts were not utilized until FY2023.

b. Program Goals

The AFO’s goals for the administration of the SRP program are to benefit the SRP holder, the local community, SRP participants, and the BLM. These goals are:

- To offer SRP applicants the opportunity to provide commercial, competitive, and organized group recreation activities on public lands;
- To enhance the economies of local communities by the utilization of local businesses and services by SRP participants and visitors;
- To provide visitors with increased opportunities to engage in recreational activities and events on public lands through SRP activities and events; and
- To assist the BLM with the management and sustainable use of public lands for recreational activities and provide revenues for SRP program management and facilities development.

c. Revenue Development

To meet the AFO’s goal, the field office will seek to increase SRP revenues by managing for positive SRP results for SRP holders, the local community, the SRP participants, and the BLM.

1. The SRP holder benefits by:
 - a. having the opportunity to attain permits in a timely manner,
 - b. being able to operate a stable and successful public land-dependent business or activity,
 - c. having a predictable and stable business relationship with BLM, including efficient, low-cost processing of routine transactions
2. The local community benefits by:
 - a. the development of business opportunities in the outdoor recreation sector,
 - b. the provision of jobs for its citizens and tax revenues for local government,

- c. gaining improved services and quality of life through facility development and resource protection.
3. The SRP participants benefit by:
 - a. the provision of enhanced interpretive and educational recreational experiences,
 - b. the provision of improved public lands facilities for outings (i.e. clean toilets),
 - c. the ability to get together with like-minded enthusiasts for organized events.
4. The BLM benefits by:
 - a. meeting its land management goals, including protection of cultural and natural resources,
 - b. being able to direct SRP holders to appropriate locations for their activities,
 - c. partnering with SRP holders as stewards of the public lands,
 - d. providing for a more stable (and hence knowledgeable) BLM work force,
 - e. lowering costs by developing improved business management systems,
 - f. provision of revenues to use for program management and facilities enhancement.

The positive SRP results summarized above allow commercial outfitters and organized group permit holders to work with the BLM to achieve mutually agreed-upon goals. As users of the public lands, outfitters and groups have a vested interest in their sustainability. The local community gains in its economic sector, and participants and the public benefit by increased opportunities to enjoy public lands.

d. Revenue Capture and Compliance

The achievement of positive SRP results requires capture of revenue to provide necessary services. Presently, the AFO seeks to capture all revenue due to the government from all SRP holders. Continuing actions include field patrols, careful auditing of post-use reports, and the use of a tailor-made SRP database to professionalize contacts and accurately determine payments due.

Under BLM Internal Instruction Memorandum No. 2021-015, the AFO ensures:

- each SRP holder has a record keeping process that can be verified by future BLM SRP audits, a process which is used to receive and deposit income relative to their SRPs;
- each SRP holder can separate their SRP income from income in their business and;
- corresponding monthly bank statements are retained which corroborate customer receipts and deposit logs, or other compensation attributed to activities authorized under the SRP.

One of the most effective ways the AFO confirms administrative compliance for SRP holders is through auditing. Periodic verification of gross receipts from permit holders ensures accurate monitoring of revenue and provides a clear line of communication to provide necessary records and revenue corroboration.

The AFO works with existing permittees to offer opportunities for the public by providing excellent service to SRP holders. For example, all business relations are managed through the database, in conjunction with CBS. Permittees seeking new areas of authorization can obtain augmentations to their permits in a timely manner. Permit applications are taken at any time and are normally processed in at least 180 days.

To protect SRP holders, the public, and the public lands, efforts are undertaken to ensure that SRPs are obtained by all who require them. Existing SRP holders are encouraged to report unauthorized activities, and many have done so over the years. The AFO conducts on-the-ground permit checks by driving and hiking in urban recreational areas, such as Campbell Tract SRMA, and utilizes snow machines, boats, fixed

wing aircraft, and helicopters to cover the vast amount of remote land in the area, including the Iditarod NHT/SRMA, Neacola ACEC, and Squirrel River SRMA. In addition to field patrols, staff regularly search the internet for businesses and groups utilizing public lands without a permit, as well as work with other agencies and BLM offices to ensure permit compliance. Staff also document the presence of vehicles and groups that require permits; follow-up contacts are made with these groups. Staff review advertisements and acquire business cards; staff then contact those who are operating on public lands, inform them of permit requirements, and give them an opportunity to acquire an SRP. Frequent checks of social media are utilized to ensure compliance in popular areas, including the Iditarod NHT and associated shelter cabins. Entities continuing to operate without authorization are cited for non-compliance with SRP regulations.

e. Field Office Costs

In addition to permit administration expenditures, the AFO maintains an infrastructure that supports SRP holders. For instance, BLM public shelter cabins along the Iditarod NHT/SRMA maintained by the AFO, partially with L1232 funds, are used by all permitted events on the Iditarod Trail and provide critical life-saving shelters for event participants. The Rohn Air Navigation Site - part of the Iditarod NHT SRMA - is also authorized for use by two permittees as a staffed checkpoint for each of their respective events.

Annual operating costs for the SRP program include expenditures for permit administration, permit monitoring, law enforcement services, trailhead maintenance and cleaning, trail maintenance and marking, and trash disposal. Two permanent employees provide most of the services to manage the SRP program. Two additional employees are involved with a small number of permits to administer and monitor. Two law enforcement officers (LEO) provide SRP monitoring support. AFO's Pilot LEO provides fixed wing aviation monitoring support for some SRP monitoring and compliance. The recreation maintenance duties include repair and cleaning of the trailheads, trash collection, and maintenance and repair of routes, trails, and other recreational infrastructure. This large and sometimes remote workload has mainly been the responsibility of three recreation employees. The labor expended by each employee has been prorated among the various fee and base accounts in which he or she works.

The vehicles used to support the recreation maintenance, monitoring and law enforcement staff include pick-up trucks, UTV's, snowmachine and winter grooming equipment, mountain and winter fat tire bikes, e-bikes, chainsaws, brush cutters and other large power tools, variety of hand tools, dump trucks, Bobcats, mini excavators, etc. Table 8 identifies the annual expenditures associated with the SRP program, revenues, and the net gain /loss for FY2019-FY2023.

In FY2023, of the total recreation fee expenditures which equaled \$52,214, 16% was associated with outreach and visitor services, 59% was dedicated to repair and maintenance of sites and facilities, and 25% was for SRP administration including law enforcement. Outside of those costs, approximately \$24,114 was planned for SRP monitoring with aviation resources due to the high number of SRPs administered across the vast landscape in remote AFO locations. These aviation-based trips are often combined with other resource program and funding sources to accomplish BLM's multi-use goals. In FY2023, SRP monitoring with aviation was completed with a combination of law enforcement flights and other resource program flights.

As previously discussed, many variables influence the number of SRPs administered year-to-year and additionally, many variables influence the cost of administration, including weather, tourism numbers to

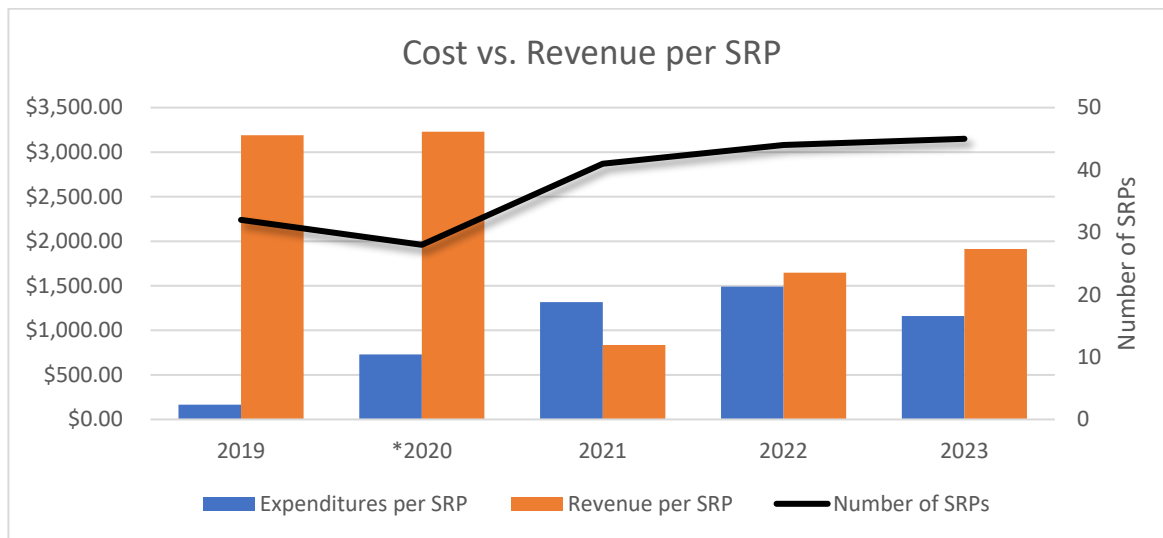
Alaska, the local economy, national policies, and more. To achieve the AFOs goals of benefitting the SRP holder, the local community, SRP participants, and the BLM, the AFO seeks to maintain a positive fund balance per SRP administered and improve tracking of expenditures associated with SRPs throughout the large administrative unit. Table 8 below summarizes cost vs. revenue of SRP administration from FY2019-FY2023.

Table 8. Total annual expenditures associated with SRP program revenue.

SRP Program Revenue and Expenditures	FY2019	FY2020	FY2021	FY2022	FY2023	5-Year Average
Total Expenditures	\$5,292	\$20,441	\$54,020	\$65,640	\$52,214	\$39,521
Total Revenue	\$102,102	\$90,399	\$34,260	\$72,463	\$76,219	\$75,089
Number of SRPs	32	28	41	44	45	38
Average Expenditures per SRP	\$165	\$730	\$1,318	\$1,492	\$1,160	\$973
Average Revenue per SRP	\$3,191	\$3,228	\$836	\$1,647	\$1,913	\$2,163
Difference	\$3,025.31	\$2,498.49	(\$481.93)	\$155.06	\$752.55	\$1,190

Figure 2 below illustrates the difference between revenue collected from SRPs compared to the costs of SRP administration from FY2019-FY2023, including the number of SRP’s administered. On average, every SRP generates approximately \$2,163 per year, which contributes directly to supporting the infrastructure needed to aid SRP holders in the AFO. However, the AFO is continuously working to improve business practices to make the processing and monitoring of SRPs more efficient. Such efforts include programmatic environmental assessments, streamlined environmental compliance, standardized stipulations, and increased usage of technology resources, capabilities, and services, as outlined in previous sections of this plan.

Figure 2. Cost vs. revenue per SRP from FY2019-FY2023



Additional costs to the government of administering the permitting program include managerial support, work by recreation planners and park rangers and office overhead. These costs are generally borne by the L1220 account (Recreation Management).

f. Priorities for Future Expenditures

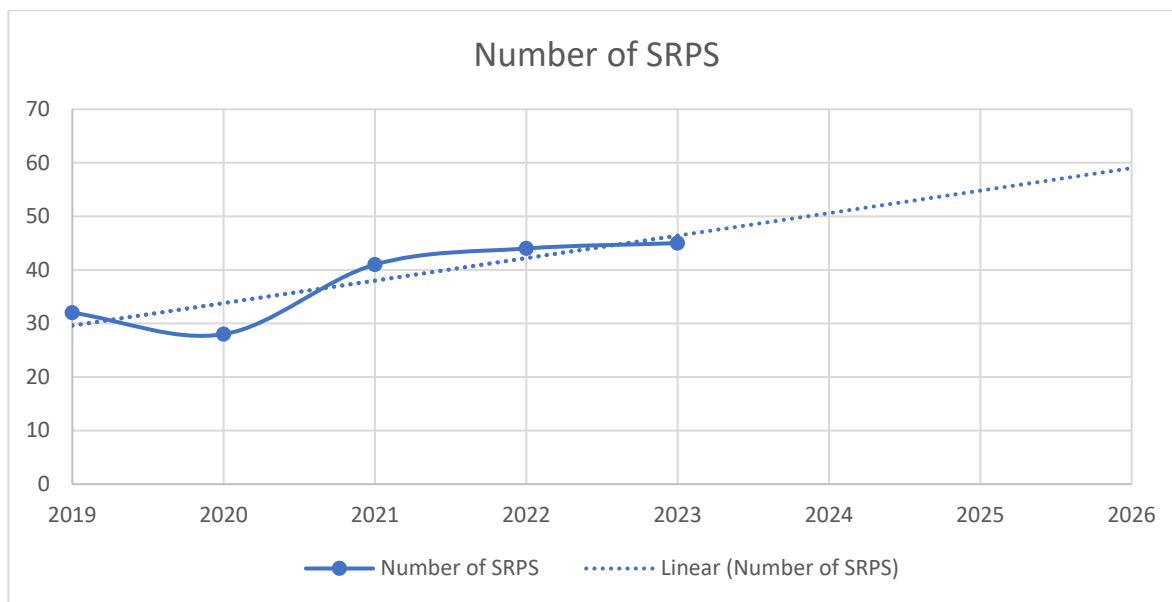
The AFO will strive to maintain a positive fund balance of no less than the prior year’s expenditures in the L1232 accounts. The reason for this goal is to have the flexibility to obtain matching funds in applying for grants, effect emergency repairs, provide long-term stability for staff services, provide capability to meet unanticipated costs or to take advantage of unforeseen opportunities to improve services, or to use revenues to provide future recreation infrastructure to support visitor use. This fund balance will be managed as a working capital fund, with the goal of investing in facilities and services that will promote program growth consistent with visitor demand through generation of increased revenue. Table 9 shows the predicted annual operating costs of the SRP program for FY2024-FY2026.

Table 9. Estimated annual operating costs from AK AFO for SRP program.

FY	Estimated Revenue	Projected Number of SRPs	Estimated Annual Expenditures from AK06, AK08 & AK13
2024	\$75,000	51	\$55,000
2025	\$80,000	55	\$60,000
2026	\$85,000	59	\$65,000

Based on data from FY2019-FY2023, AFO expects the number of SRPs administered could grow approximately four per year from FY2024-FY2026 and the cost to administer them to remain at approximately \$1,080 per SRP or increase slightly due to Cost of Living Adjustments. The estimated revenue and expenditures were calculated from the expected number of SRP’s multiplied by the average revenue and cost per SRP from FY2019-FY2023.

Figure 3. Linear projection of number of SRP’s in FY2024-FY2026.



While the AFO uses collected SRP fees in AK06, AK08, and AK13 to cover some of the operating costs of the SRP program, appropriated federal funds will again be used in FY2024 and beyond to augment these

revenues. For example, items such as the garbage collection contract and the vault toilet pumping contract are presently paid for by appropriated monies, although with expected cost increases, AK06, AK08, and AK13 funds may be required to supplement appropriated funds.

Labor costs of those working in the SRP program will also continue to be supported by appropriated monies from L1220 in FY2024 and beyond. Of the three staff involved with the SRP program, \$288,691 from L1220 was utilized for SRP-related work months in FY2023. That is, the cost of each work month for SRP management multiplied by the actual work months involved with SRPs. Much of the money is allocated to two employees that perform most of the SRP work, dedicating up to 40% of their work months to the SRP program. In FY2024, AFO expects that approximately \$317,560 will be spent on SRP-related labor due to annual cost of living and step increases.

Excluding the costs associated with maintenance, AFO expects new projects to cost approximately \$250,000. Projects such as these are being funded by the AK06, AK08, and AK13 program. Table 10 shows the major future project expenditures in support of the SRP program in the AFO, along with associated estimated costs of completing the projects requiring SRP-related monies.

Table 10. AFO projects associated with SRP's and expected costs.

Project	Estimated Cost
Mini Bobcat	\$35,000
Seasonal Trail Crew Trail Maintenance	\$25,000
Materials for Routine & Annual Maintenance	\$15,000
Deferred Cabin Maintenance	\$150,000
Aviation Monitoring	\$25,000

It is important to maintain a fund balance in the recreation fee accounts, including that derived of SRP fees, so that the BLM can provide seamless permit administration, address threats to public health and safety immediately, and to allocate revenue for future investments in recreation infrastructure. The biggest priorities for the AFO are ensuring SRP compliance, and maintenance and monitoring of SRP holders. The fund balance would also be available to cover labor costs of those employees involved in the SRP program should allocated monies be reduced.

The AFO has determined that the AK06, AK08, and AK13 accounts combined should maintain a positive fund balance of at least \$180,000 (3-year expected average cost [\$56,840], plus 5-year average historical expenditures [\$39,521], plus expected costs of new projects divided by 3 years [$\$250,000/3=\$83,333$]) per year to support upcoming projects and expected increase of SRPs. This amount would cover expected costs for the next three years and allow funds to be allocated for future site improvements.

The primary objectives for potential future revenues generated by the SRP program are to:

- **Use fees for direct operating or capital costs associated with the SRP program (FLREA, Section 8(a)(3)(E).** These costs are defined as “the costs that occur as a direct result of collecting, remitting, transporting, protecting, storing, or securing fee funds at a site”. These costs are also referred to as “cost of collection”. Expenses may include salaries, benefits, and training. Performance measures have been established by BLM to set a target for cost of collection at 15%

of annual fee receipts. To comply with this cost target, AFO will use up to 15% of the annual SRP fees collected for cost of collection administrative expenses. These expenses will include labor and training costs associated with the processing of post use reports and fee billings. This work may be accomplished by BLM employees, volunteers, or contracted labor.

- **Not use more than an average of 15% of total revenue collected for administration, overhead, and indirect costs related to the recreation fee program (FLREA, Section 8(c)).** This includes only those costs not listed as separate expenditure activities in other sections, but which are necessary for the administration of the recreation fee program. Costs may include budget development and program planning, administrative support, and public notification and information. To comply with this limitation, AFO will use up to 15% of annual fee revenues in support of overall permit program oversight. This will pay for labor and operational costs associated with budget tracking, policy development and direction, supervision and guidance, meetings and training and other associated management and administrative support.
- **Ensure permit compliance with the stipulations required by their authorized permit and ensure public safety for customers and participants while visiting the public lands under permit authorizations.** FLREA allows fee revenues to be spent on law enforcement related to public use and recreation (FLREA, Section 8(a)(3)(D)] therefore revenues will be used to provide law enforcement assistance to monitor SRP events and tour operations. **Help customers and participants realize expected beneficial outcomes from their experience.** Revenues may be used for labor to design and produce informational handouts and signs, purchase interpretive brochures, purchase kiosks or kiosk components, and purchase sign materials and decals to promote ethical, lawful, and responsible behavior on public lands. This information will facilitate their ability to learn land use and social etiquette skills, increase outdoor skills, gain an understanding for caring for the environment, gain a greater respect for their cultural heritage, and increase their knowledge of the nature and gain an appreciation for their land and natural resources.
- **Repair, maintain, and enhance facilities directly related to visitor enjoyment, visitor access, and visitor health and safety.** Customer enjoyment, access and health and safety are all directly dependent upon the on-going maintenance and repair of the facilities and trails within the AFO. Maintaining cleaner public lands also directly affects the enjoyment and health and safety of visitors enjoying permitted activities.

g. Impacts of the SRP Program

According to the BLM's Sound Investment 2022 publication¹, "lands used for recreational activities attract visitor spending and contribute significantly to local economies. In FY2021, BLM-managed lands received more than 80 million recreation-related visits nationally, an increase of about 10% over the previous year." Recreation in Alaska accounted for 9% of the state's total economic output for the BLM.

Many SRP holders in the AFO are big-game guiding services whose industry has important economic impacts to the state of Alaska, including rural villages. McDowell Group produced an economic impact report of guided hunting in Alaska in 2020 for the Alaska Professional Hunters Association². Guided non-resident hunters spent \$62.4 million associated with big game hunting in Alaska in 2019, generating 1,380

¹ <https://www.blm.gov/sites/default/files/docs/2022-12/2022-SoundInvestment.pdf>

² https://www.mcdowellgroup.net/wp-content/uploads/2021/02/apha-impacts-report-2020-final-1_27_21.pdf

jobs directly related to guided hunts. On average, nonresident hunters participating in guided hunts spent \$18,400 each on hunting packages. In total, the guided hunting industry generated an estimated \$91.8 million in economic output statewide in 2019. In remote communities, opportunities to earn cash income are limited and guide spending is an important component of these communities' economy. In total, approximately 59% of the industries spending for labor, goods, and services occurred outside Alaska's largest communities: Anchorage, Fairbanks, and Juneau.

The AFO strives to continue providing services that support SRP holders, local communities, and the overall economy. As described previously, the fee schedule is set by the Director of the BLM and is updated every three years. The AFO does not have the authority to change or waive use fees, but aims to maximize time, resources, and management of the SRP program to benefit its customers.

5. Outreach

a. Public and Stakeholder Participation

The "Bureau of Land Management's Blueprint for 21st Century Outdoor Recreation" recreation strategy is to provide exception and one-of-a-kind recreational experiences that invite all to share in the enjoyment and stewardship of their public land. The BLM is committed to durable change, which means it must work closely with communities and partners to respond to varying recreation opportunities and pressures and seek continuous program improvements. Another principle of change is a shift from reactive recreation management to a proactive approach, enabling planning to consider sustainable resource management needs. As part of this strategy, the AFO seeks engagement and partnerships with local stakeholders to accomplish mutual public access and recreation objectives. The AFO also seeks relationships with youth groups, like the Student Conservation Association and Alaska Trails to help promote a positive experience for youth and to inspire them to take a greater interest in public land issues.

The BLM will continue building existing partnerships and pursuing new ones that complement the agency's mission. In a fiscal environment that cannot sustain wasteful spending and program inefficiency, the agency continues to act on opportunities that will support a healthy, robust, relevant, and accountable recreation program for the public. Future priorities include increasing the number and scope of such partnerships and agreements associated with the AFO recreation program.

b. Visitor Feedback Mechanisms

SRP permittees can currently provide general feedback to AFO regarding the SRP program in two ways: by providing written comments on the Post Use Report forms submitted semiannually, or through direct contact with AFO SRP staff in person or by phone/email. SRP clients and participants have several unsolicited ways to provide comments to AFO regarding the permit program.

Tour and guide participants can provide comments to their tour operator or their event organizer who can in turn relay the concerns to AFO SRP staff. Potential mechanisms to proactively collect comments could be to informally talk to clients and participants while monitoring activities.

Public Participation

FLREA requires that the public be provided opportunities to participate in the development of, or changing of, a recreation fee established under FLREA [FLREA, Section 4(a)]. It also dictates that before establishing any new recreation fee area, the public will be provided the opportunity for public involvement by establishing guidelines for public involvement and guidelines on how agencies will demonstrate on an annual basis how they have provided information to the public on the use of recreation fee revenues; and these guidelines will be published in the Federal Register [FLREA, Sections 4(c)1-3)].

Public participation is not necessary for this plan and is not subject to a comment period. This determination is made based on two factors. Firstly, Section 4 of FLREA is not applicable to the SRP program in AFO since no fees are being established. Standard fees for permitted recreation activities are set by the BLM Director and published in the National Recreation Fee Schedule. The public may only provide comments on the established fee structure or fee amounts when afforded the opportunity by the National Office. Local managers and State Directors do not have the authority to adjust fees. Secondly, the SRP program is not establishing a new fee area or program.

Management objectives were presented in the section “Priorities for Future Expenditures” which discussed the planned use for future revenues expected to be collected. Full disclosure of actual expenditures will be reported annually to the public in accordance with FLREA which can viewed by visiting [BLM’s Spend Plan and Accomplishment Report](#) (SPAR) website. This plan will be posted on the BLM Recreation Permits and Fees website for review by any interested members of the public.

Appendix A. National Special Recreation Permit Fee Schedule

National Special Recreation Permit Fee Schedule

Type of Permit	Minimum Recreation Fee	Use Fee	Cost Recovery Fee
Commercial or Vending	\$130, adjusted every 3 years based on the IPDI*	3 percent of gross revenue	If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour
Commercial assignment of a nonexclusive site	\$230, adjusted every 3 years based on the IPDI		If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour
Commercial assignment of an exclusive site	\$230, adjusted every 3 years based on the IPDI		If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour
Commercial, competitive, or organized group use or events	\$130 or \$7/person/ day, whichever is greater		If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour
Competitive	\$130, adjusted every 3 years based on the IPDI*	3 percent of gross revenue or \$7/participant/day, whichever is greater	If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour
Organized group or event	\$130 or \$7/person/ day, whichever is greater		If more than 50 hours of staff time is required to process and administer the permit, cost recovery charges begin with the first hour

*IPDI = implicit price deflator index