# Arctic District 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 # LVRDAK070000



United States Department of the Interior Bureau of Land Management, Alaska Arctic District Office April 2024

### **Business Plan for**

### **BLM Arctic District Office Recreation Fee Sites**

### 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 Arctic District Office.

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#### **Business Plan for**

### **BLM Arctic District Office Special Recreation Permits**

### **Executive Summary**

The Bureau of Land Management (BLM) Arctic District Office (RDO) 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". The FLREA recognizes the BLMs authority to collect Special Recreation Permit (SRP) fees for the recreational use of certain areas. FLREA allows collected SRPs 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 RDO. The RDO SRP Fee Business Plan is RDOs official documentation in the event of an audit. In the RDO, SRP activities are deposited into the LVRDAK07000 (AK07) account.

# 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.

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 RDO 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. Prior to 2020, the RDO did not have a dedicated treasury account established for SRP revenue and funds were deposited into adjacent field office accounts. To enhance the recreation program in the RDO, a new account was created for SRP revenue in which funds are to be utilized to improve recreation opportunities within the district.

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 RDO.

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

- National Petroleum Reserve Alaska Integrated Activity Plan (IAP) and Environmental Impact Statement (EIS) 2020 and associated 2022 Record of Decision (ROD)
- Central Yukon Planning Area Alaska Resource Management Plan (RMP) In-Progress 2021
- Kobuk Seward Peninsula RMP 2016

### c. Environmental Justice

Consistent with Department of Interior and BLM priorities, the BLM RDO 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 RDO manages 23.1 million acres of public lands from its main office in Fairbanks and the Barrow Field Station in Utqiaġvik. These lands cover north of the Brooks Range to the Beaufort Sea, and the Northern span of the state from the Chukchi Sea to the Canadian border. The area covered by the RDO includes the National Petroleum Reserve in Alaska (NPR-A), the largest contiguous block of federal land managed by a single agency. The petroleum reserve provides for significant oil and gas exploration and development activities, important habitat for migratory birds and caribou, and subsistence hunting and fishing access for rural residents. The Naval Petroleum Reserve Production Act governs land management within the NPR-A, which protects significant resources, including recreational opportunities, to the extent that is consistent with oil and gas exploration and development.

The Barrow Field Station is staffed year-round and provides an important information center for local residents. The office serves a key role in liaising with the North Slope Borough, local and regional tribal entities, and Alaska Native Corporations.

Image 1. Structure in the National Petroleum Reserve.



Though front-country recreation opportunities in the RDO are limited, backcountry and dispersed use of BLM-administered land abounds via aircraft. Opportunities include big-game hunting, rafting, fishing, camping, hiking, and wildlife viewing. RDO-administered land is adjacent to other world-class recreational public land including Gates of the Arctic National Park, Noatak National Preserve, Cape Krusenstern National Monument, Alaska Maritime National Wildlife Refuge, and Arctic National Wildlife Refuge.

The Central Arctic Management Area (CAMA) Wilderness Study Area (WSA) consists of 258,796 acres of land southeast of the NPR-A. It is in one of the most remote locations in the U.S. and includes tundra covered hills, mountains, and flatlands. Within the WSA, there is a 29,000-acre Area of Critical Environmental Concern (ACEC) known as the Nigu-Iteriak ACEC which was established to protect geological and cultural resources. There is no public road access to and no marked trails within the WSA and all access to the area is by aircraft or boat.

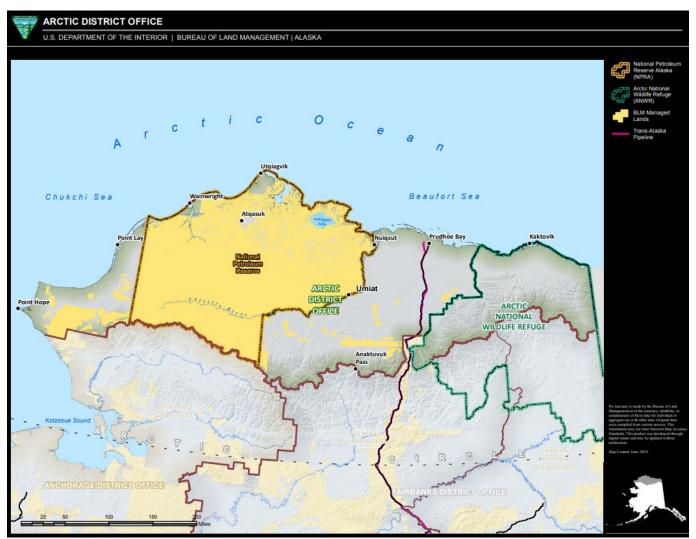
### b. Recreation Resources

SRP's are issued on a discretionary basis to manage use of BLM-administered public lands for recreational, commercial, competitive, and organized group activities. The setting for these recreational SRP activities and events is in the RDO boundary displayed in Map 1 below. These lands are almost entirely not accessible by road and have no marked trails. The terrain is difficult, and visitors are advised to possess knowledge and skill in backcountry travel prior to visiting the district.

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

- NPR-A
- CAMA WSA
- CAMA Mesa Site
- Nigu-Iteriak ACEC

Map 1. RDO boundary map.



Primarily, RDO 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.

The RDO also processes SRP authorizations for guided rafting, hiking, and wildlife viewing tours. These trips often require overnight camping at multiple locations along the route, typically for no more than two nights per location.

### c. Demographics

Most resident visitors to the RDO are from Fairbanks and surrounding communities. In addition to use from local communities, several areas in the RDO attract a wide range of visitors from areas 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. Anchorage is the most populous city in Alaska and has the highest population density, 170 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 Fairbanks North Star Borough is \$76,464 (2016-2020) with 7.2% of the population living below the poverty level. The median age is 31.5; 23.5% are persons under the age of eighteen and 45.9% of the population is female. Fairbanks is racially composed of 75.3% Whites (non-Hispanic), 3.4% Asians, 8.4% Hispanics or Latinos, 8.2% American Indians and Native Alaskans, 5.2% Black or African Americans, .6% Native Hawaiian and other Pacific Islander, and 7.2% two or more races.

### d. Visitation

The RDO is the least visited district in Alaska due to the entire management area being off the road system. Despite the low visitation, the SRP program provides an important service for commercial operators providing air transportation to the district.

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. Table 1 shows RMIS numbers for the estimated annual recreation visits to the RDO over the past 5 years. In fiscal year (FY) 2023, the annual visitation from SRPs in the RDO in was 78. From FY2019-FY2023, visitation was likely over-estimated due to lack of staffing dedicated to tracking SRPs and visitor use calculations being restructured in FY2023. In future years, the RDO intends to improve tracking mechanisms for SRP visitation estimates.

Table 1. SRP visitation to the RDO from FY19-23.

FY	2019	2020	2021	2022	2023
Visitors	376	600	595	875	*78

\* In FY2023, visitor use calculations were restructured resulting in significantly lower visitation numbers.

RMIS figures are calculated estimates. Generally, 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 RDO, many physical visitation estimations are not feasible due to the vast size of the district and lack of road access. Instead, each type of primary activity associated with every SRP has a unique formula to generate visitation estimates and are based primarily on post-use reports.

# 3. Permitting Program

### a. Description

The RDO has the smallest recreation program in the state but plays an important role in providing valuable visitor services and recreational opportunities through management of SRPs. The RDO manages commercial activities on public lands through the SRP program, which is administered under the authorities and guidance listed previously. SRPs are required for commercial, competitive, and organized group 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 activities include 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.

The RDO also has the authority to authorize SRPs for competitive and organized group events, though currently none are authorized due to the remote nature of the district. Competitive activities are any organized, sanctioned, or structured use, event, or activity on public land in which two or more contestants compete. Organized group events are 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.

### b. Fee Description

The SRP fee schedule for permitted activities is established nationally for all BLM field offices and the RDO 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 fees in Table 2, adjusted with the most recent fee update published in the Federal Register as of May 2023.

#### Table 2. National SRP fee schedule.

Type of Permit	Minimum Annual Fee – greater of \$130 or the following:	Cost Recovery Fee
Commercial or Vending	e percent et aujuste gress terenpus, plus auj appresent	
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 other fees that may apply. The complete fee schedule is in Appendix A and outlined in the manual section available for review at the RDO.

#### Fee Determination

The RDO 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 any 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 permit holders. 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 RDO 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 RDO administered an average of four SRPs per year. Many SRP holders are issued multiple-year permits which, in addition to new SRP applications, require administration each year the permit is active.

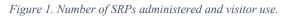
SRP holders in the RDO offer outfitter services such as guided camping, guided hunting, and guided wildlife viewing services. Table 3 shows the total amount of visitor use by primary activity attributed to SRPs from FY2019 – FY2023. The highest visitation and permits administered annually is associated with camping. Though the primary use of permits is associated with one activity, most permits include other activities for usage calculations.

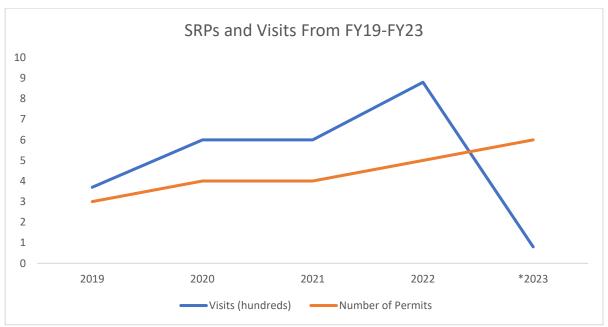
Total	3	376	4	600	4	595	5	875	5	78
Wildlife Viewing	0	0	0	0	0	0	1	0	2	8
Hunting - Big Game	0	0	0	0	0	0	1	556	3	49
Camping	3	376	4	600	4	595	3	319	0	21
Primary Activity	# of Permits	Visitor Use								
FY	2019	2019	2020	2020	2021	2021	2022	2022	2023	*2023

Table 3. Total SRP visitation by year and by primary activity.

\*Visitor use formulas were recalculated beginning in FY2023

Figure 1 below shows a general upward trend of the number of permits administered and visitor use from FY2019-FY2023, but a drop in visitor use in FY2023. This drop is not due to an actual drop in visitation numbers but a recalculating of formulas. In future years this change will be implemented, and visitation numbers will be more accurate. There are a variety of factors that influence visitation and SRP usage in the RDO, 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.





\*Visitor use formulas were recalculated in FY23 resulting in lower visitation

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 19<sup>th</sup>, 1989 (54FR 42998). For the five years covered under this plan, the minimum SRP fees were as shown in Table 4.

Table 4. 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. Prior to FY2020, SRP fees were deposited into account AK01, an account for the Dalton Highway in an adjacent field office. Account LVRDAK070000 (AK07) was created in FY2020 for the RDO SRP program to deposit and utilize fees to benefit the recreation program. RDO is currently developing the SRP recreation fee program, expenditures, and increased recreation opportunities for the first time in the district. Due to this developing program, data contained in these tables and future expenditures may appear to be lacking consistency. Initial expenditures, beginning with this business plan and infrastructure development in FY2023, are intended to improve the program and accounting practices.

Table 5. SRP Revenue by year in SRP accounts.

FY	2019	2020	2021	2022	2023	5-Year Average
Total Fees Collected	\$2,652.52	\$8,957.85	\$12,590.48	\$15,736.09	\$17,923.68	\$11,572.72

### b. Program Goals

The RDO'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 provide 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;
- 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 RDO'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 to work with the BLM to achieve mutually agreed-upon goals. As users of public lands, outfitters 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 RDO seeks to capture all revenue due to the government from all SRP holders. Continuing actions include field inspections, 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 AK Instruction Memorandum No. 2021-015, the RDO 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 RDO 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 RDO works with existing permittees to provide additional opportunities for the public by providing excellent service to SRP holders. For example, all business relations are managed through the RMIS 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 required to be submitted at least 180 days in advance.

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. The RDO utilize snow machines and helicopters to cover the vast amount of remote land in the NPR-A. 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. While subsistence activities are common within the NPR-A, staff also document the presence of vehicles and groups that may require permits; follow-up contact attempts are made with these groups when possible. 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.

### e. Field Office Costs

Much of the annual operating costs for the SRP program are expenditures for permit administration and permit monitoring. In addition to administration and monitoring expenditures, the RDO maintains minimal infrastructure that support SRP holders. In FY2023 a weather shelter along the Colville River was constructed within walking distance of a remote airstrip commonly used by commercial operators for guided trips. Two permanent employees provide most of the services to manage the SRP program and remote infrastructure maintenance. The labor expended by each employee is prorated among the various fee and base accounts in which he or she works. To support backcountry recreation maintenance, monitoring, and law enforcement staff, the RDO utilizes UTV's, fixed-wing aircraft, and helicopters.

In FY2023, 100% of the total recreation fee expenditures (\$14,245.88), was dedicated to the construction of the weather shelter along the Colville River. Although SRP monitoring is a major expenditure for the SRP program, it is accomplished by use of helicopter and fixed-wing flights. These aviation-based trips are combined with other resource program and funding sources to accomplish BLM's multi-use goals and offset costs associated with such remote work.

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 RDOs goals of benefitting the SRP holder, the local community, SRP participants, and the BLM, the RDO seeks to maintain a positive fund balance per SRP administered and improve tracking of expenditures associated with SRPs throughout the large administrative unit. Table 6 summarizes cost vs. revenue of SRP administration from FY2019-FY2023 and estimates future revenue for FY2024-FY2026.

Image 2. Weather shelter along the Colville River, constructed in FY2023 utilizing the SRP program revenue.



On average, every SRP generates approximately \$2,600.64 per year, which contributes directly to supporting the infrastructure needed to aid SRP holders in the RDO. However, the RDO 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.

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 RDO currently utilizes fees toward processing and maintaining SRPs for commercial users. A goal of the SRP program is to allocate funds to provide outreach through interpretation and education when the program is more developed. The RDO estimates that approximately 10% of recreation staff time is dedicated to managing SRP's.

The RDO 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 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 6 shows the projected annual AK07 operating costs for F20Y24-F20Y26.

FY	Number of SRP's	Total or Estimated Revenue	Total Expenditures
2019	3	\$2,652.52	\$0
2020	4	\$8,957.85	\$0
2021	4	\$12,590.48	\$0
2022	5	\$15,736.09	\$0
2023	5	\$17,923.68	\$14,245
*2024	6	\$21,508	N/A
*2025	7	\$25,093	N/A
*2026	8	\$28,678	N/A

Table 6. Estimated annual operating costs for the SRP program from FY24-26.

\*FY2024, FY2025, and FY2026 are calculations based on the minimum use fee adjustment in FY2023 and the expected growth of the SRP program in the RDO.

Based on data from FY2019-2023, RDO expects the number of SRPs administered to grow approximately one per year from FY2024-FY2026 and generate approximately \$3,585 per SRP in revenue based on the minimum use fee adjustment in FY2023. The RDO plans to utilize this additional revenue to directly support SRP holders through infrastructure maintenance and development. Estimated revenue was calculated by multiplying the expected number of SRP's by the average revenue per SRP in FY2023.

While the RDO uses collected SRP fees in AK07 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. Labor costs of those working in the SRP program will continue to be supported by appropriated monies from L1220 in FY2024 and beyond. Two staff at the RDO are involved with SRP management, both of which are natural resource specialists, who dedicate approximately 10% of time to SRP management. Due to the complexity of resources within the RDO, recreation-related workloads tend to be secondary.

Future RDO projects include continuing to maintain current infrastructure and facilitate the construction of additional weather shelter sites along the Colville River. Other projects include procurement of supplies, vehicles, and materials needed to promote recreation within the district and to ensure continued monitoring of commercial SRP activities. Fees may be used for outreach and education related to recreation and visitor services, staff labor, intern labor costs related to recreation and visitor services improvements, and digital media improvements to better reach more visitors.

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 RDO 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 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, RDO 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, RDO 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 RDO. 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 publication<sup>1</sup>, "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 RDO 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 Association<sup>2</sup>. Guided non-resident hunters spent \$62.4 million associated with big game hunting in Alaska in 2019, generating 1,380 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 RDO 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 RDO 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 21<sup>st</sup> 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 RDO seeks engagement and partnerships with local stakeholders to accomplish mutual public access and recreation objectives. The RDO also seeks relationships with youth groups 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 RDO recreation program.

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

<sup>&</sup>lt;sup>2</sup> https://www.mcdowellgroup.net/wp-content/uploads/2021/02/apha-impacts-report-2020-final-1\_27\_21.pdf

### b. Visitor Feedback Mechanisms

SRP permittees can currently provide general feedback to RDO regarding the SRP program in two ways: by providing written comments on the Post Use Report forms submitted semiannually, or through direct contact with RDO SRP staff in person or by phone/email. SRP clients and participants have several unsolicited ways to provide comments to RDO 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 RDO SRP staff. Potential mechanisms to proactively to 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 RDO 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 <u>BLM's Spend</u> <u>Plan and Accomplishment Report</u> (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

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 \$6/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

National Special Recreation Permit Fee Schedule

\*IPDI = implicit price deflator index