

MINIMUM RENT ANALYSIS & SCHEDULE

IDAHO DISTRICTS

BLM Land Use Authorizations Tracts of BLM Land to 25 Acres

SUBMITTED TO

Bureau of Land Management
Janet Eubanks, Realty Specialist
2800 Cottage Way
Sacramento, CA 95825

IVIS CASE NUMBER

00036815

IVIS PROJECT NUMBER

L13053

DATE OF REPORT

September 10, 2014

SUBMITTED BY

Anne Renaud-Wilkinson, MAI
Department of the Interior
Office of Valuation Services
1220 SW 3rd Ave., Suite 1010
Portland, Oregon 97204



**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF VALUATION SERVICES
1220 SW 3RD AVENUE, SUITE 1010
PORTLAND, OREGON 97204-2825**

September 10, 2014

Bureau of Land Management
Janet Eubanks, Realty Specialist
2800 Cottage Way
Sacramento, CA 95825

Re: Fee Schedule of Minimal Rents on BLM small tracts up to 25 acres

Dear Ms. Eubanks:

Per the request of the Bureau of Land Management (BLM) via the Office of Valuation Services, I have conducted a study of comparable commercial practices and other valuation methodologies that are useful in establishing a reasonable rent schedule for Land Use Authorization grants for small uses up to 25 acres. This study was conducted for the purposes of establishing or updating current BLM minimal rent schedule fees for non-linear rights-of-way. A streamlined and uniform approach to establishing small tract rental fees is consistent with provisions of 43CFR§2806. Within the context of this study the terms rent and fee are interchangeable.

Past experience has demonstrated that appraising individual Land Use Authorizations (LUAs) request is not economically beneficial to the U.S. Government as the time and cost associated with an appraisal was substantially higher than the rent achieved. For this reason, development of a rent schedule is warranted. Hence, I have conducted a study and this report provides my findings of comparable commercial practices, as well as establishing a fee schedule for small non-linear tracts of BLM land.

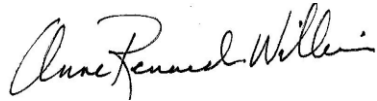
It is important for the realty specialist along with any user of this study to read the study in its entirety in order to understand the analysis prior to using any information or data contained herein.

Please note, as this study is a compilation of a wide variety of information including BLM memorandums, regulations, along with other private and public sources, some of the comments, discussions and explanations may not have been specifically cited.

This fee schedule is not intended to replace existing schedules for mineral, hydroelectric, geothermal, telecommunication, linear right-of-way uses, or any other use fee established by specific authorization.

The following pages contain the fee schedule for small minimal rents on BLM lands in Idaho. The schedules are specific to the identified BLM Districts, as well as individual counties within Idaho. Following the schedule charts is the explanation of how the values were derived.

Respectfully submitted,



Anne Renaud-Wilkinson, MAI
Department of the Interior
Office of Valuation Services
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ANNUAL FEE												
IDAHO FALLS DISTRICT												
COUNTY Impact >	0 – 5 ACRES			5.1 – 10 ACRES			10.1 – 15 ACRES			15.1 – 25 ACRES		
	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High
Bannock (54)	135	203	270	270	403	538	403	605	807	672	1010	1345
Bear Lake (42)	105	158	210	210	315	420	315	473	630	525	788	1050
Bingham (67)	168	251	335	335	503	670	503	754	1005	838	1256	1675
Bonneville (69)	173	259	345	345	518	690	518	776	1035	863	1294	1725
Butte (46)	115	173	230	230	345	460	345	518	690	575	863	1150
Caribou (42)	105	158	210	210	315	420	315	473	630	525	788	1050
Clark (43)	108	161	215	215	323	430	323	484	645	538	806	1075
Custer (69)	173	259	345	345	518	690	518	776	1035	863	1294	1725
Franklin (60)	150	225	300	300	450	600	450	675	900	750	1125	1500
Fremont (66)	115	248	330	330	495	660	495	743	990	825	1238	1650
Jefferson (78)	195	293	390	390	585	780	585	878	1170	975	1463	1950
Lemhi (66)	115	248	330	330	495	660	495	743	990	825	1238	1650
Madison (99)	248	371	495	495	742	990	743	1114	1485	1237	1856	2475
Oneida (35)	88	131	175	175	263	350	263	394	525	438	656	875
Power (45)	113	169	225	225	338	450	338	506	675	563	844	1125
Teton (135)	338	506	675	675	1013	1350	1013	1519	2025	1687	2531	3375

ANNUAL FEE												
COEUR d'ALENE DISTRICT												
COUNTY	1 – 5 ACRES			5.1 – 10 ACRES			10.1 – 15 ACRES			15.1 – 25 ACRES		
Impact >	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High
Benewah (47)	118	176	235	235	353	470	352	529	705	588	881	1175
Bonner (130)	325	488	650	650	975	1300	975	1462	1950	1625	2438	3250
Boundary (102)	255	383	510	501	752	1002	765	1148	1530	1275	1913	2550
Clearwater (56)	140	210	280	280	420	560	420	630	840	700	1050	1400
Idaho (42)	105	158	210	210	315	420	315	473	630	525	788	1050
Kootenai (123)	308	461	615	615	922	1230	923	1384	1845	1538	2306	3075
Latah (54)	135	203	270	270	403	538	403	605	807	672	1010	1345
Lewis (42)	105	158	210	210	315	420	315	473	630	525	788	1050
Nez Perce (50)	125	188	250	250	375	500	375	563	750	625	938	1250
Shoshone (178)	445	668	890	890	1335	1780	1335	2003	2,670	2225	3338	4450

ANNUAL FEE												
TWIN FALLS DISTRICT												
COUNTY	1 – 5 ACRES			5.1 – 10 ACRES			10.1 – 15 ACRES			15.1 – 25 ACRES		
Impact >	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High
Blaine (85)	213	319	425	425	638	850	638	956	1275	1062	1594	2,125
Camas (44)	110	165	220	220	330	440	330	495	660	550	825	1100
Cassia (70)	175	263	350	350	525	700	525	788	1050	875	1313	1750
Gooding (114)	285	428	570	570	855	1140	855	183	1710	1425	2138	2850
Jerome (114)	285	428	570	570	855	1140	855	183	1710	1425	2138	2850
Lincoln (78)	195	293	390	390	585	780	585	878	1170	975	1463	1950
Minidoka (103)	251	377	502	502	752	1003	772	1159	1545	1288	1931	2575
Twin Falls (92)	230	345	460	460	690	920	690	1035	1380	1150	1725	2300

ANNUAL FEES												
BOISE DISTRICT												
COUNTY	1 – 5 ACRES			5.1 – 10 ACRES			10.1 – 15 ACRES			15.1 – 25 ACRES		
Impact >	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High	Minimal	Moderate	High
Ada (157)	393	589	785	785	1178	1570	1178	1766	2355	1963	2943	3925
Adams (45)	113	169	225	225	338	450	338	506	675	563	844	1125
Boise (42)	105	158	210	210	315	420	315	473	630	525	788	1050
Canyon (159)	398	596	795	795	1192	1590	1193	1789	2385	1988	2981	3975
Elmore (61)	153	229	305	305	458	610	458	686	915	763	1144	1525
Gem (82)	205	308	410	410	615	820	615	923	1230	1025	1538	2050
Owyhee (36)	90	135	180	180	270	360	270	405	540	450	675	900
Payette (90)	225	338	450	450	675	900	675	1013	1350	1125	1688	2250
Valley (74)	185	278	370	370	555	740	555	833	1110	925	1388	1850
Washington (30)	75	113	150	150	225	300	225	338	450	375	563	750

CONCEPTUAL OVERVIEW

The Office of Valuation Services has been tasked with the mission of updating and standardizing a state-by-state process of charging fees for individual, sometimes incidental, non-linear uses of small tracts of BLM land. Historically, these fees were established based on linear rights-of-way formulas, comparable fees established by other federal agencies, or appraisals, as dictated by 43 CFR§2806.50:

When neither the linear nor the communication use rent schedule is appropriate, BLM determines your rent through a process based on comparable commercial practices, appraisals, competitive bid, or other reasonable methods.

Setting rents is difficult as there are no generally acceptable standards or methods in setting rents to cover a broad range of uses over a wide geographic area.

In the past, these types of rents were based on surveys of other federal agencies; set arbitrarily and adjusted based on demand, or established by individual appraisals. However, individual real estate appraisals are not economically feasible as the time and cost associated with an appraisal is often substantially higher than the economic benefit to the government with regards to the compensation achieved. Furthermore, appraisal methodologies such as market rent surveys do not translate well for establishing such rent schedules. This is because when considering market rent, the term “market” implies the presence of potentially competing renters for a specific property type along with competitive property owners interested in attracting at least one of those renters. In short, market rent requires that a competitive market exist. Given that small land use authorizations (including linear right-of- ways) are site specific and generally non-competitive, they are not market orientated uses. That is, there are **not** multiple users competing for use of a property where there are multiple substitute properties.

Given the nature of this assignment--- to assist BLM in their development of a statewide fee schedule for sites under 25 acres applicable to users of government land--- it was necessary to consider alternative methods that are more attune to economic reasoning than traditional valuation methodology. Nonetheless, these methods find there basis in those used by other federal agencies.

Intended BLM users of this fee schedule should exercise reasonable judgment in assessing the impact to the proposed rental sites. While the preceding charts provide exact values within the acreage ranges, there is great leeway for the intended users to interpret the category of use and degree of impact. For instance, a request to film a video on BLM land may encompass a cumulatively large area. And yet, actual filming will involve a specific area at any one time. The selection of a minimal impact fee within a small acreage size (1 to 5 acres) may be appropriate, or selection of a high impact within a larger range may likewise be appropriate, depending on the interpretation of the user.

Time constraints may also require interpretation with regard to the degree of impact. Use of BLM land as a staging area for a day use may be interpreted as minimal, even though use is exclusive and intense.

SCOPE OF THIS ASSIGNMENT

When determining an appropriate alternative methodology, I relied on the following scope of work:

- I determined if the BLM state was operating under an existing minimum rent schedule, or if a schedule needed to be established.
- I surveyed other federal agencies, state agencies and private parties for information that might provide data within the context of comparable commercial practices.
- I referenced the Code of Federal Regulations, specifically 43 CFR, Public Lands: Interior, for guidance as to how fees had been established for similar land use. (Linear right-of-ways, Mineral, hydrologic, geothermal and telecommunication uses have specific, formula-based fee schedules.)

METHODOLOGY

After careful consideration, I determined the Rate of Return to Land would provide a reasonable basis for opening rent for use of government lands. This method is similar to that used for the linear ROW schedule used by BLM under 43 CFR 2800, 2880, and 2920. Derivation of the per county rental rate employed a five step process¹:

1. Determine the LAND VALUE ESTIMATE per county (NASS values x 80%)
2. Derive a RATE OF RETURN. (See following derivation)
3. Determine an ENCUMBRANCE FACTOR. (See following discussion)
4. Apply the RATE OF RETURN to the LAND VALUE ESTIMATE, then multiply the per acre value times the largest acreage size in each of the size brackets (1-5 acres, 6-10 acres, 11-15 acres, 16-25 acres). This is the 100% encumbrance rental rate for that size bracket
5. Apply 50% and 75% to the 100% value from #4 to arrive at the minimal and moderate rates.

LAND VALUE ESTIMATE

Estimating land value over a large geographical area is difficult to say the least. However, given the predominately rural nature of BLM land, using agricultural land values as the basis for this

¹ This method is recognized in other agencies as being a reasonable and well received method of rent determination. Indeed, under the authority of 16 U.S.C. 792-828c; and 42U.S.C. 7101-7352, the Federal Energy Regulatory Commission established an annual per-acre rental fee based on an adjusted per-acre value multiplied by an encumbrance factor multiplied by the rate of return multiplied by the annual adjustment factor. This formula was established after a lengthy legal challenge and public comment period.

type of analysis is reasonable. Support for using the USDA/NASS published reports on land value is provided by Congress, which specifically endorsed the use of this data for rental determination purposes when it passed the “National Forest Organizational Camp Fee Improvement Act of 2003” (Pub. L. 108–7) (16 U.S.C. 6231). This law established a formula for determining rent for organizational camps located on NFS lands by applying a 5 percent rate of return to the average per acre land and building value, by state and county, as reported in the most recent NASS Census. The law also provided for a process to update the per acre land values annually based on the change in per acre land value, by county, from one census period to another.

The United States Department of Agriculture (USDA) publishes an annual agricultural land value report via the National Agricultural Statistics Service (NASS) identified by ISSN: 1949-1867 ([http://www.nass.usda.gov/Charts and Maps/Land Values/index.asp](http://www.nass.usda.gov/Charts_and_Maps/Land_Values/index.asp)). Agricultural land values are reported by state and broken down into per county values. For the State of Idaho, the AG LAND, INCLUDING BUILDINGS, ASSET VALUE, MEASURED IN \$/ACRE, was used as the reference for arriving at the land value estimate. These values are found in the NASS on-line web site at <http://quickstates.nass.usda.gov/data/printable> where the numerical value represents the overall per acre value. Since BLM land covers a broad spectrum of land types, with prime recreational land associated with fishing resources, as well as remote high desert land, it is reasonable to use a similarly all-encompassing agricultural land value. Nonetheless, the overall value does include irrigated land and buildings, so an adjustment to the overall land value is applied to account for these conditions. Guidance for this adjustment can be found in Federal Register; 43 CFR Parts 2800, 2880, and 2920, Update of Linear Right-of-Way Schedule; Final Rule of October 31, 2008. In this rule, a 20% adjustment is deemed appropriate as a diminution to the overall land value to account for irrigation and buildings. Therefore, a 20% diminution is applied to each county’s overall land value to arrive at a base Land Value Estimate as shown below.

Idaho Falls District		Coeur d’Alene District		Twin Falls District		Boise District	
County	Adj.Land Value \$/acre	County	Adj.Land Value \$/acre	County	Adj.Land Value \$/acre	County	Adj.Land Value \$/acre
Bannock	1446	Benewah	1270	Blaine	2286	Ada	4222
Bear Lake	1137	Bonner	3493	Camas	1187	Adams	1216
Bingham	1788	Boundary	2736	Cassia	1874	Boise	1135
Bonneville	1853	Clearwater	1506	Gooding	3064	Canyon	4265
Butte	1232	Idaho	1116	Jerome	3072	Elmore	1637
Caribou	1121	Kootenai	3309	Lincoln	2100	Gem	2209
Clark	1165	Latah	1442	Minidoka	2774	Owyhee	982
Custer	1842	Lewis	1122	Twin Falls	2472	Payette	2417
Franklin	1606	Nez Perce	1346			Valley	1978
Fremont	1786	Shoshone	4784			Washington	799
Jefferson	2096						
Lemhi	1778						
Madison	2651						
Oneida	950						
Power	1210						
Teton	3634						

RATE OF RETURN

A rate of return is an income rate that expresses the relationship between rent (income) and the corresponding land value (capital). It is similar to a capitalization (cap) rate that an investor uses to convert income into an indication of value (direct capitalization) when analyzing income producing properties--- **net income divided by cap rate is an indication of value**. Cap rate, the ratio of income to the property value, is among the most widely used variables to quantify property values and plays an important role in real estate investment decisions. In reverse, a rate of return can be used to indicate rent--- **land value multiplied by a rate of return is an indication of rent (income)**.

Cap rates are typically extracted from sales of income producing properties. However, given the uniqueness of government property an alternative method is required to opine a reasonable rate of return. In theory, a cap rate, or in this case, a rate of return is the sum of four components: Expected Inflation, Real Return, Risk Premium, & Recapture Premium.

Expected Inflation

By definition, an investment is the commitment of capital in exchange of a monetary benefit, or a return (income). Investors require a **return of capital invested** as a prerequisite for committing capital to a given venture or property. This required return should first provide for the preservation of the purchasing power of invested capital through time. Hence, the first component of required return is expected inflation, so that the purchasing power of invested capital will not decline through time. Ideally, this component is estimated based on inflation rate forecasts, however, many analysts use an average inflation rate over the past five or ten years.

The Consumer Price Index (CPI) averaged over the past five years as published by Bureau of Labor Statistics (<http://www.bls.gov/home.htm>) was used to project expected inflation.

Year	CPI
2009	-0.40%
2010	1.60%
2011	3.20%
2012	2.10%
2013	2.10%
Average	1.72% Expected Inflation

Real Return

The second component of required return is the real return, which is the true monetary benefit that the investor will gain from committing his/her capital--- **return on capital**. This is typically estimated as the difference between the rate on government securities and the inflation rate reflecting a risk free rate or safe rate.

Using the average 30-year Treasury bond rate over the past five years is reasonable for estimating a real return on real estate. This is in tune with ground lease rates and is what the government is paying as a fair return to those who invest in the U.S. Government (<http://www.treasury.gov>).

Year	Rate
2009	4.08%
2010	4.25%
2011	3.91%
2012	2.92%
2013	3.45%
Average	3.72%

Deducting the five year average rate of expected inflation from the 30 year treasury bond rates results in the real return as illustrated in the following chart.

Real Return Calculation

5 Year Average 30-Year Bond Rate	3.72%
5 Year Average Expected Inflation	<u>1.72%</u>
Real Return	200%

Risk Premium

A property investment is actually an investment in the property's future income earning capacity. However, there is a lot of uncertainty with this future income earning capacity. This risk is the uncertainty associated with the future income stream and the value of the property. Within this context, real estate investors require a risk premium on top of inflation and real return. The risk premium for a given property depends on the quality of the tenants occupying the property, the length of existing contracts, the property's occupancy rate, the strength of the property's location and expectations regarding the prospects of the economy and the local real estate market.

Since government owned land is not an investment per se. No risk is associated with leasing unimproved government owned vacant land and for this type of analysis, a risk premium is not warranted.

Recapture Premium

Finally, investors require a recapture premium in the case of improved property investments, since improvements depreciate or lose value through time. Since the value of the property represents the owner's invested capital, it follows that by the end of the physical life of improvements, when its value becomes theoretically zero, the investor loses its capital. The purpose of the recapture premium is to replace this capital loss through time. Thus, if the

physical life of an improvement is 50 years the recapture premium should be 2% on an annual basis. If we assume though, that the capital that is recaptured every year is reinvested (sinking fund approach) then a less than 2% recapture rate will be required. Since my analysis involves unimproved government owned land, no recapture premium is warranted.

Rate of Return Conclusion

The Rate of Return is estimated as the sum of the four components as discussed above and illustrated in the following:

Expected Inflation	1.72%
Real Return	2.00%
Risk Premium	---
<u>Recapture Premium</u>	<u>---</u>
Rate of Return	3.72%

As a test of reasonableness I have examined the implied rates imbedded in the NASS data. Specifically, I have looked at the cash rents and their relationship to the agricultural land value. As an example, the average rent received for agricultural land in Bannock County is \$60.17 and the average unadjusted per acre value for agricultural land is \$1,807. The implied rate of return is:

$$\$60.17 \div \$1,807 = 0.033 = 3.3\%$$

A random check of multiple counties within the four BLM districts in Idaho finds a range of implied capitalization rates between 1.6% and 8.6% with a majority of rates in the 2% to 4% range. This would support a built up rate based on a safe rate with added risk at 3.72%, as demonstrated on the previous page.

As an added test of reasonableness for the rate of return analysis above, I considered sales and offerings of properties encumbered with an absolute net lease--- also known as a bond lease and reflective of ground leases. As these types of encumbrances are most similar to the characteristics associated with government Land Use Authorizations (LUAs). That is, bond lease tenants are similar to LUA user in that they would perform all obligations related to the premises including the construction and maintenance of improvements and are fully responsible--- in essence the only responsibility of the property owner is to cash the rent checks. In the private sector, these types of leases are known as "hell-or-high-water leases" meaning that regardless of what occurs on or off the property, the tenant is obligated to pay rent. Therefore, the credit worthiness of the tenant is similar to a company's bond rating--- hence, the term bond lease. That is, a strong credit tenant is generally referred to as an investment grade tenant and considered economically similar to an investment grade bond

secured by real property. The advantage in leasing to a credit tenant is strong and stable income stream that is risk averse, even when there are negative changes to market conditions.

The following chart illustrates median asking cap rates for properties offered for sale based on the companies that occupy the real estate.

Median Asking Cap Rates by Company Occupied Real Estate

Company	Cap rate	S & P Rating	Risk
McDonald's	4.05%	A	0.33%
Chase	4.60	A+	0.88%
Wells Fargo	4.70%	AA	0.98%
Bank of America	4.75%	A	1.03%
7-Eleven	5.50%	AA-	1.78%
CVS	5.50%	BBB+	1.78%
Walgreens	5.58%	A	1.86%
AutoZone	5.69%	BBB	1.97%
Advance Auto Parts	6.40%	BBB	-2.68%
Dollar General	6.50%	BB	2.78%
FedEx	6.50%	BBB	2.78%

Us 30 YR Treasury Bond Rate = 3.72%

As shown, there is a relationship between a company's Standard & Poor's bond credit rating and real estate cap rate (or rate of return). Extracting the risk premium from the cap rate, further illustrates the association between risk, bond rating, and cap rates.

These added tests of reasonableness support a rate of return conclusion of 3.72%.

THE ENCUMBRANCE FACTOR

The Encumbrance Factor (EF) reflects the intensity of the proposed use and corresponding impact on the land. An encumbrance factor is mostly considered in easement valuations, i.e., the impact an easement has on market value. Easement valuations are reflected in differences in market value before & after the imposition of an easement. That is, a property is first valued without an easement and then valued with an easement; the difference in value being the easement's impact on value. Studies regarding the impact on value that a specific easement (or use) will have when it partially encumbers a property is time intensive and costly to perform. Hence, the enactment of the law regarding the BLM Linear Right-of-Way schedule and the development of a non-linear right-of-way schedule. Because of the time and cost, published studies are typically utilized and referenced when categorizing uses in determining an Encumbrance Factor.

One such study was conducted and published by Donald Sherwood, MAI, SR/WA in the May/June 2006 edition of the Right Of Way magazine., a portion of which is represented as follows:

Easement Valuation Matrix

Percentage of Fee	Comments	Potential Types of Easements
90% - 100%	Severe impact on surface use. Conveyance of future uses.	Overhead electric Flowage easements Irrigation canals Access roads
75% - 89%	Major impact on surface use. Conveyance of future uses.	Pipelines Drainage easements Flowage easements
51% - 74%	Some impact on surface use. Conveyance of ingress/egress rights	Pipelines Scenic Easements
50%	Balanced use by both owner and easement holder	Water line Sewer line Cable line Telecommunication lines

High Impact (100%)

Characteristics of significant impact right-of-way grants or permits warranting a higher rent include: a relatively on going occupation, an exclusivity of use (no other uses would be possible), an industrial type uses, large fenced areas, significant surface disturbance and/or ongoing disruption, high visual impacts, and little or no flexibility as to location. For high impact uses, I have concluded an Encumbrance Factor of **100%** to be applied to land value.

High impact uses might include:

- Pump and compressor stations
- Equipment storage sites
- Processing sites
- Portal or tunnel sites
- Sewage lagoons
- Water treatment sites
- Large, fenced and gated staging areas for recreation or sport events
- Parking areas with intense use

Moderate Impact (75%)

Characteristics of moderate impact right-of-way grants or permits include small sites (generally 1 to 5 acres in size) where the uses and impacts are minimal because the area and/or uses are short term, intermittent, and/or may be quasi-commercial in nature.

For moderate impact uses, I have concluded an Encumbrance Factor of **75%** to be applied to land value. Moderate impact uses might include:

- Small permanent sign sites
- Gates
- Culverts
- Historic or commemorative monuments
- Small temporary staging areas for sporting events
- Seasonal work camp or outfitter sites
- Cultural arts or educational events
- Sample collecting
- Farm equipment and machinery storage yard
- Large haystack storage areas
- Highway signs
- Geo-Technical testing sites

Minimal Impact (50%)

Characteristics of minimal impact right-of-way grants or permits include small sites (up to 5 acres) that are long term or permanent, seldom visited, can be easily relocated if necessary, include smaller disturbed or enclosed areas, have little or no ongoing surface disturbance. Typically, these sites can accommodate multiple uses. For instance, a minor water or air quality site would accommodate public access.

For minimal impact uses, I have concluded an Encumbrance Factor of **50%** to be applied to land value. Minimal impact uses might include:

- Mail box sites
- Water and air quality monitoring sites
- Minor water control berms and earthwork
- Pig launcher and valve sites on pipelines
- Temporary filming sites with no surface disturbance
- Seasonal pivot crossings
- Temporary agricultural product storage site

The degree of impact requires a significant level of interpretation on the part of BLM staff that will implement this schedule. Along with the small size and often unique aspect of these land use authorizations comes an implied level of temporariness, adding another layer of interpretation to the authorization. In its most rudimentary interpretation, this rent schedule represents the minimum amount that should be applied to a land use authorization.