

APPENDIX L

SPECIAL RECREATION PERMITS

SPECIAL RECREATION PERMIT PROGRAM OVERVIEW

All commercial, competitive, and organized group SRP proposals will be evaluated on a case by case basis, and their approval or disapproval will be at the discretion of the Authorized Officer. All SRPs are considered undertakings under the NEPA. Permit approval is dependent on conformance with all applicable land use planning documents and environmental review in accordance with NEPA. All existing permits will be analyzed for conformance to the Land Use Plan Revision.

In order to provide good customer service, to reduce unnecessary submissions of applications, and to ensure consistent consideration of permit proposals, all new SRP proposals will be evaluated using the following process. Additional implementation guidance for GJFO will be completed and will provide applicants with specific information including but not limited to: application deadlines, timelines for processing, application package requirements, fees, use reporting, and penalties.

PERMIT PROCESS

Pre-application Consultation

A pre-application consultation would be utilized to determine if a SRP is required and allowed, and if so, what type of permit is required. Among other factors, proposals will be evaluated to determine whether the proposal is consistent with recreation objectives; whether the opportunity is already available under an existing permit; whether there is adequate market competition; and whether the proposal would create conflict with the public and/or existing permitted activities. Additionally, during the pre-application consultation, permit proposals will be classified using the Classification criteria below. Once a class determination is made and type of permit (competitive,

organized or commercial) is established the following guidelines and administration practices will apply.

Permit Class and Allowable Use Area

Table I
Permit Class and Allowable Use Area

Classification	Considered*	Not Considered
Class 1		
Class 2		
Class 3		
Class 4		

* Permit will be allowed unless restricted through specific management prescriptions identified in RMP or subsequent planning efforts.

Note: This table will be completed based on the alternative selected in the Record of Decision.

Commercial Administration

If a proposal conforms to land use planning decisions, within capacity for proposed area and within the deadlines described in the GJFO permit policy, the applicant will then be asked to fill out all the required SRP application package requirements and pay applicable fees.

Competitive Event Administration

If a proposal conforms to land use planning decisions and there is a minimum of 180 days prior to the proposed use, the applicant will then be asked to fill out all the required SRP application package requirements and pay applicable fees.

Vending

If a proposal conforms to land use planning decisions, is in conjunction with a competitive events and organized group and there is a minimum of 180 days prior to the proposed use, the applicant will then be asked to fill out the required paperwork and pay applicable fees.

Organized Group Permit Administration

An organized group/event permits are for group outdoor recreation activities or events which are neither commercial nor competitive. The authorized officer determines when a permit is required based on planning decisions, resource concerns, user conflicts, public health and safety, and/or the need for monitoring.

Organized groups above the group size criteria of 12 defined as primitive or backcountry areas through social setting character, including Wilderness, WSAs and lands managed to protect wilderness characteristics or above the group size of 25 in remaining field office at a single location for more than two hours, are

required to contact the BLM prior to their event to determine if an SRP would be required. After reviewing the activity and location with the organizers, BLM will determine whether or not a permit is required (see **Table 2**). If a permit is not required, we may document this determination in the form of a *Letter of Agreement*.

General Permit Administration

All permit administration will be done in accordance with NEPA, BLM Manual: H-2930-I-Recreation Permit Administration, BLM Colorado State SRP Handbook, and all associated BLM SRP Instruction Memorandums and Information Bulletins.

Application Evaluation

The Authorized Officer will evaluate the application using the “Permit Application Review Criteria” listed below. The criterion includes specific objectives identified in the land use plan for both Extensive Recreation Management Areas and Special Recreation Management Areas. The issuance or denial of SRPs will be made in accordance with these criteria.

Permit Application Review Criteria

Permit proposals described in business and operating plans will be evaluated using the following criteria (see **Table 2**, Determining Need for an Organized Group Special Recreation Permit). These criteria offer an objective framework for SRP application evaluation. Any or all of the criteria will be evaluated to authorize or deny a permit (subject to potential modifications) by the authorized officer (see **Tables 3**, Classification Criteria, and **Table 4**, Permit Classification).

Compliance History

Applicant must be in compliance, and have a history of compliance, with local, state and federal regulations. Applicant or authorized representatives have not been convicted of a federal, state or local violation in connection with the proposed operations or activities within the last three years.

Safety and Safety History

Applicant has demonstrated a history of providing an acceptable level of safety for clients and affected publics.

Consistency with Land Use Planning Documents

Proposals will be evaluated for consistency with current planning documents, including but not limited to the GJFO Resource Management Plans (Revised) and applicable Special Recreation Management Area plans. All proposals in a Wilderness Study Area must be consistent with the BLM’s interim management policy.

Conflicts

Permits will not be issued in areas where conflicts currently exist between existing permittees, between permittees and the public or landowners. Valid conflicts include:

- Overlapping use areas where the same type of use is currently permitted
- Limited public land ownership and/or related access
- Camps; location, number and distance between camps
- Types of activities permitted
- Overcrowding and/or use levels during specific time periods, supporting infrastructure at capacity
- Enforcement/compliance problems exist
- Improper conduct by permittee or employees
- Unacceptable resource impacts

Diversity of Services

Applicants must demonstrate that their proposal enhances the diversity of recreational opportunities available for visitors and the services are needed by the public.

Low Percentage of BLM Public Lands

Applications may be refused where public lands comprise a low percentage of the total area and recreational management goals are being met.

Adjoining Lands and Joints Permits

Preference will not be given to applicants who own or lease private land adjacent to BLM public lands. Preference will not be given permittees that have a joint permit issued by another land management agency office.

These criteria are a means to analyze applications and offset potential problems. Many complex issues are best addressed through an ongoing effort between the permittees and the BLM.

If the proposal meets the application review criteria, the appropriate NEPA document would be completed. Permits may be denied as a result of issues identified during the NEPA process. Any stipulations identified during the NEPA process will be included on approved permits.

Table 2
Determining Need for an Organized Group Special Recreation Permit

Criteria	Permit Not Required	Permit Required	Deny as proposed
Is the activity recreational in nature?	If the use is not recreational, may require "lands" permit or no permit.		
Is the use appropriate to the site? Is there a management concern for cultural or natural resources, or facilities on public land?	Yes, site very conducive to the proposed use, provided for in planning.	Site is appropriate for group size and activity, not specifically provided for in plan.	No, site is not appropriate for use as proposed. Site has significant cultural or natural resource concerns. Does not conform with recreation planning goals, violates ROS Class or experience prescriptions. While the criterion recognizes a need to screen for conflicts with cultural or natural resources, the screening process lacks a response action for proposed SRPs with unacceptable conflicts.
Does the activity further recreation program goals and objectives?	Yes	Yes	No
Is monitoring needed?	Nothing beyond one simple site visit.	Monitoring beyond a one-time site visit required.	Long term monitoring of one or more resources required
Health and Safety Concerns?	None	Concerns for event participants or other public land users.	Unmitigated, high risk to human health and safety. Unreasonable risk especially to non-participants.
Bonding desirable to cover reclamation, damage to government property or resources	No	Bonding desirable or required	n/a
Insurance desirable to protect the U.S. Government from claims by group participants or third parties?	No, liability exposure is negligible.	Insurance is desirable due to possible claims for personal injury or property damage.	n/a
Special services required such as Law Enforcement, fire protection, exclusive use of public lands, reserved sites etc.	No	Yes	n/a

**Table 3
Classification Criteria**

Resource		Anticipated Impact	Description of Impact
Wildlife	Visual	No	Artificial lighting system used will not be used or will be less than 1000 candle power.
		Yes	Artificial lighting system used will be 1000 candle power or greater.
	Audio	No	A loudspeaker or other broadcasting device will not be used
		Yes	A loudspeaker or other broadcasting device will be used
Special Status Species		High	Less than 100 meters from special status species
		Medium	More than 100 meters from special status species
		Low	Greater than 200 meters from special status species
Hydrology	Perennial Waters/Riparian communities	Low	Actions are not located within 500 feet of perennial waters or extent of riparian community.
		Moderate	Actions are located between 325 to 500 feet of perennial waters or extent of riparian community.
		High	Actions are located closer than 325 feet to perennial waters or extent of riparian community.
	Water Quality	No	Proposal doesn't fall within a water quality impaired stream segment or activity won't affect stream
		Yes	Proposal falls within a water quality impaired stream segment
Cultural Sensitivity Zones		High	Resource conflict exists at the site.
		Medium	Some associated features present; existing protection is adequate.
		Low	No associated features.
Paleontological		High	Known vertebrate fossil site(s) can be seen.
		Medium	Surface geology consists of PFYC Class 4-5 formations.
		Low	Surface geology consists of PFYC Class 1-3 formations.

Table 3
Classification Criteria

Resource	Anticipated Impact		Description of Impact
Soils/Vegetation	Low		Site and associated features demonstrate resilience and resistance to anticipated activity or are sufficiently disturbed that they would not be impacted
	Moderate		Site and associated features demonstrate some ability to resist/recover from impacts
	High		Site and associated features demonstrate limited ability to resist/recover from impacts
Within Existing Disturbance	No	Low	Effects of a temporary nature and no additional surface disturbance
		Medium	Effects lasting less than one year and/or surface disturbance less than 5 acres
		High	Effects lasting more than one year and/or surface disturbance more than 5 acres
	Yes	Small	< 5 acres
		Medium	5 to 40 acres
		Large	> 40 acres
Duration of Use	Short		One day or less
	Moderate		Two to six days
	Long		> six days
Anticipated Number of Participants	Low		< 12
	Medium		13-25
	High		25+
Anticipated Number of Vehicles	Low		1-3
	Medium		4-6
	High		7+
Competitive Event	Yes		The event or activity is competitive in nature
	No		The event or activity is non-competitive
Motorized/Mechanized Support	Yes		Vehicles or other mechanized equipment required in support of activity
	No		No vehicles or other mechanized equipment required.
BLM Monitoring and Inspection Requirements	None		No significant pre or post permit oversight activities required
	Low		Pre or post permit activities require <8 hours BLM oversight
	High		Pre or post permit activities require >8 hours BLM oversight

Table 4
Permit Classification

Evaluation Factors	Permit Class			
	I	II	III*	IV*
Wildlife (Visual)	No	No	Yes	Yes
Wildlife (Audio)	No	No	Yes	Yes
Hydrology (Perennial/Riparian)	Low	Low/Moderate	Moderate/High	High
Hydrology (Water Quality)	Low	Low/Moderate	Moderate/High	High
Cultural	Low	Moderate	High	High
Paleontological	Low	Low/Moderate	Moderate	High
Soils/Vegetation	Low	Low/Moderate	Moderate	High
Within Existing Disturbance (Yes)	No	No	Yes	Yes
Within Existing Disturbance (No)	Yes	Yes	No	No
Duration of Use	Short	Short/Moderate	Moderate	Long
Anticipated Number of Participants	Low	Low/Moderate	Moderate	High
Anticipated Number of Vehicles	<25	25-50	50-100	>100
Competitive Event	No	No	Yes	Yes
<i>Motorized/Mechanized Support</i>	No	Y or N	Y	Y
<i>Monitoring and Inspection Requirements</i>	None	None/Low	Low	High
Examples	Group Camping, Guided Hunting, Organized Groups, Guided horseback rides, Commercial River Rafting & Fishing, Motorized Tours on System Roads		Non-competitive motorized events, Non-Motorized Competitive Events	Festivals, Motorized Competitive Events

* Class III and IV events are more likely to require cost recovery due to the probability of these events needing more than 50 hours of BLM staff time for permit administration.