

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
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IN REPLY REFER TO:  
2930 (CO-930) P

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Instruction Memorandum No. CO-2006-043  
Expires: 09/30/2006

To: Colorado Field Office Managers  
Attn: Colorado Recreation and Planning Leads

From: State Director

Subject: BLM Colorado Policy Guidance for Issuing Special Recreation Permits (SRP) to School Groups

**Program Area:** Recreation and Special Recreation Permits.

**Purpose:** This Instruction Memorandum (IM) will provide consistency, additional guidance, and clarification of existing policy for implementation of Bureau of Land Management (BLM) Manual and Handbook H-2930-1, regarding when it is appropriate to waive the requirement for a SRP to school groups for academic, educational, and scientific uses.

**Background:** Colorado BLM Field Offices have been inconsistent with issuing SRPs to school groups. This issue was identified as a priority at the June, 2005 BLM Colorado Recreation Workshop. There was consensus among the Recreation Planners to assign the SRP Team with developing a recommendation for a statewide policy on SRP issuance for school groups. The concept was discussed and approved at a State Leadership Team meeting.

**Policy/Action:** This IM provides guidance and recommendations for Recreation Planners and Field Managers when issuing SRPs to public school groups.

This guidance only applies to K-12 public schools. Private schools and colleges that have tuition and fees associated with an activity or trip on BLM public lands require a commercial SRP.

Public school groups that are involved in outings on public lands are required to obtain a SRP under the following conditions:

1. Their trip is classified as a commercial trip;
2. The trip is classified as recreational;
3. When BLM determines that there are resource concerns, potential for user conflict, public health and safety issues.
4. Or SRP requirements have been established in Resource Management Plans or activity level plans.

To guide permit administrators and authorized officers, the following guidelines should be used:

- A. Public schools are not inherently commercial. To determine whether a public school trip should be classified as commercial, use the following criteria:
  1. If the trip is led by a teacher who is on staff at the school and does not receive compensation above and beyond his/her normal salary, it is not commercial.
  2. If the trip does not charge the students a fee that is beyond sharing of actual expenses, it is not commercial (i.e., food, travel, equipment rental, etc.).
  3. If the trip is led by a volunteer who is not part of the school staff and there is no compensation to the volunteer, it is not commercial.
  4. If the school hires someone to specifically outfit and guide the trip who is not on the normal teaching staff, it is commercial.
  5. If students are charged a fee beyond the sharing of actual costs, it is commercial.

If the trip meets any of the above commercial criteria, the trip will require a commercial SRP.

- B. If the trip is not commercial, use the following criteria to determine if the trip needs an organized group permit.
  1. Determine if the trip is recreational or educational in nature. If the trip is recreational, an organized group permit will be considered. (see criteria below)
  2. If the trip is educational, does the trip involve a means of access or activities normally associated with recreation? If yes go to C. below.
  3. If the trip is educational and does not involve a means of access or activities normally associated with recreation, an SRP does not apply.
  4. If the trip is educational and does involve a means of access or activities normally associated with recreation, an organized group permit will be considered. (see criteria below)

C. If a school trip is recreational or involves a means of access or activities normally associated with recreation, use the following questions to determine if an organized group SRP should be issued. If the answer is yes to any of these questions, the trip will need a SRP.

1. Are there resource concerns with the trip?
2. Will the trip create potential user conflicts?
3. Will the trip require additional monitoring?
4. Are there public health or safety issues associated with the trip?

If it is determined that an SRP is required, the appropriate fees will be charged. See H-2930-1 for fee schedules.

**Timeframe:** This guidance and clarification of existing policy will remain in effect until the Recreation Permit Administration Manual/Handbook H-2930-1 is revised to reflect the policy change.

**Budget Impact:** Little to no impact.

**Manual/Handbook Sections Affected:** 43 CFR 2930, dated October 1, 2002, recently issued supplemental 43 CFR 2930, dated February 6, 2004, and Bureau of Land Management (BLM) Manual and Handbook, H-2930-1, released March 30, 2004 and October 7, 2003 respectively.

**Coordination:** The BLM Colorado Special Recreation Permit Team prepared this guidance with consultation from State Outdoor Recreation Planners.

**Contact:** Contact Jack Placchi (CO-930), SRP and Travel Management Coordinator, Colorado State Office at 303-239-3832.

Signed by:  
Sally Wisely  
State Director

Authenticated by:  
Cathy Cooney  
Branch of IRM & Access

4 Attachments:

- 1- Code of: Federal Regulations 43 CFR (2 pp)
- 2 - Policy Guidance Implementing and Clarifying Final and Supplementary Rules for "Permits for Recreation on Public Lands" (6 pp)
- 3 - Using a Letter of Agreement for Organized Groups (1 p)
- 4 - Letter of Agreement (2 pp)