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From: [Jane Anderson](#)
To: [Mike Murray](#)
Cc: [Jane Moore](#)
Subject: draft proposal
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Attachments: [CAHA Considerations Regarding New Beach Access Fee.doc](#)

Hi Mike

Thanks again for including us in these discussions. Jane and I always want to assist the parks with their challenges so having this communication line between the park, region and WASO is great. I know the region is in a state of flux about who is managing the fee program but once that position is finally filled we hope that the selectee can become educated about the proposal since much of the implementation should include them.

Rather than fill your whole draft with lengthy comments Jane and I put together a list of items to consider as you flesh out the proposal. Some of the items are things to watch out for as you are making your plan become reality. Please contact us with any questions you may have or if you would like us to participate on further calls. Jane Moore is out Nov. 12-19 and I'm pretty much around through Dec. 22.



CAHA Considerations Regarding New Beach Access Fee.doc

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Considerations Regarding New Beach Access Fee for CAHA

- Per NPS policy and REA, establishing an access fee for CAHA needs to be an entrance fee and should be called an entrance fee to reduce confusion to the visitor. A “parking fee” has been approved only in a few instances for the NPS such as metered parking in urban areas to discourage commuter parking. In order for an entrance fee to be established several issues must be considered:
 - The park must honor and sell interagency passes (per REA – any park charging an entrance fee must honor and sell the passes.) This could be a logistical challenge regarding where the passes could be available. Automated fee machines at this time can only produce a receipt which must be exchanged for a pass at another location.
 - The prices for entrance fees need to align with the current NPS pricing structure which for CAHA is “Group 2” (\$7 pp/\$15 per vehicle/\$30 annual pass.) The length of stay for per person or per vehicle may be established by the park (usually 1-7 days). Currently the current servicewide entrance fee structure does not include a monthly pass. This would be a modification to the structure that would need further discussion in order to maintain a consistent model for pricing.
 - Civic engagement is required by REA to vet proposed fees with the public and get feedback before any new fee is implemented. The Director has placed a moratorium on all new fees and fee increases at this time, especially for controversial fees. This may or may not be a factor depending upon the timeframe and political climate when you implement.

- Establishing third party agreements for sales of entrance fees, permits etc. will require some coordination and consideration
 - If outside parties are selling permits for NPS under Special Park Use there are certain limits on how the money is spent to recover costs for management of the program. It may not cover a commission for an outside vendor to sell the product, provide education etc.
 - For outside vendors to sell entrance products a fee management agreement is required. Standardized templates and parameters for these agreements are being developed at this time and will include commission levels, refund policies etc. The issue is complicated because of the requirement to sell and issue the interagency passes. There needs to be a reasonable option for visitors to obtain the senior or access pass from government staff due to documentation requirements.

- Numerous logistical considerations must be examined for both collection of fees for permits and compliance of who has entrance passes/permits
 - Cost of developing hangtags and stickers. Work done with the interagency passes will help. GPO must do the printing.
 - Coordination of fee collection function and education goal may be a little challenging at non staffed sites

- There are restrictions in FLREA about charging fees on non-federal lands (adjacent parking areas). A solicitor should be consulted on this issue.
 - Costs of staff (fee collection, compliance), equipment, inventory, deposit requirements, accountability needs, security, internet access/phone lines for automated fee machines or kiosk or visitor center for credit card use and deposits (TGANet), must all be considered.
 - Compliance for the required permits/entrance passes may take additional staff and logistics to avoid complaints from the public.
- Expenditures of Fee Revenue
 - The park should already be familiar with expenditure policies, deferred maintenance requirements, use of the comprehensive plan, cost of collection parameters etc., but it would be in the park's best interest to educate all parties interested in how the funds will be used about the expenditure categories as authorized by law and current NPS policies regarding expenditure parameters.