

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
9-1. Purpose	No comments received on this paragraph.		
9-2. Goals	Paragraph 9-2: Except for the first goal, this listing really stretches credibility. For instance the second bullet states "- to promote national economic development through the efficient allocation of resources." Huh? That is a bureaucratic palaver without meaning. The third and fourth statements are clearly elitist – sounds like these fees will eliminate those who are below our economic and/or social class from visiting Corps recreation areas – do we as an organization and as individuals really consider that a desirable goal? And the last statement has no basis in fact – no study to date has shown that fees foster user responsibility – some in our profession assume it to be true, but there is no definitive proof. Vandalism is still a frequent occurrence at Disneyland – they just fix it faster than we do! Suggest retaining the first goal and eliminating the rest.	NWD	Rejected, opinion from one project. Comment not endorsed by District or Division
9-3. Policy	ER 1130-2-550, 9-3 Policy, b. Signage. This states the U.S. Fee Symbol will be displayed at our use fee areas which indicates this is an area under that program. The Corps accepts Golden Age and Golden Access cards and provides a 50% reduction in fees accordingly. However, this symbol implies we also accept the Golden Eagle card and therefore would also provide a 50% reduction. This is not Corps policy. This signage can be confusing to our customers who upon seeing the symbol naturally assume the Corps will accept the Golden Eagle card and provide the 50% reduction. They have a card, the symbol is displayed, but their card is not accepted. It is suggested the sign be modified to indicate we do not accept the Golden Eagle card or a new symbol be created to allow for a limited acceptance of this program	NAD	Legislation requires the posting of this sign
	9-3 a. The policy states that users shall be assessed fair and equitable fees with consideration given to: benefit to the recipient, and public policy or interest served, among other factors. We do not believe that the timing is right for increasing day use fees. Implementation of the day use program has been an uphill battle in gaining public acceptance and changing public perception. The field projects are just now beginning to realize a lower level of animosity from day users toward the fee program, the Corps, and its employees. To increase day use fees at this point will set the fee program, the Corps' image, and employee safety back to where it was seven years ago. In fact, we may have to begin reducing our overall fee collection efforts due to lack of funds and services available to the public.	SWD	OMB has required the Corps to increase collections by 25M. Consumer Price Index (CPI) warrants a fee increase at this time.
	9-3a (4) "Service Area" should be defined. Paragraph 9-3c(3) in EP 1130-2-55- indicates that 30-60 miles may be considered reasonable when comparing Corps Facilities/amenities with others.	SWD	Answer found in EP. Service area is self-explanatory.
	Paragraph 9-3.c: Reference to 36CFR should be to 327.23 instead of 327.25	NWD	Concur- changed
	9-3.c. - Failure to Pay. The correct violation section should be 327.23, Recreation Use Fees	SPD	Concur- changed
	9-3 c. Recreation use fees are found in 36 CFR 327.23.	SWD	Concur- changed
	9-3c Should be 36 CFR 327.23	NWD	Concur- changed
	paragraph 9-3.c.: The Title 36 CFR reference should be "36 CFR 327.23".	SAD	Concur- changed

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	Failure to pay. SHOULD THIS BE 36 CFR 327.23, RECREATION USER FEE?	NWD	Concur- changed
	Paragraph 9-3.d: Recommend this paragraph state that Congress has not authorized the Corps to charge entrance fees. This statement will help our NRM team better understand the reason behind our somewhat contorted policy - "Trust us this isn't an entrance fee, we call it a day use fee, but you can't enter unless you pay the day use fee, but it really isn't an entrance fee."	NWD	Concur- Pursuant to the Land and Water Conservation Fund Act no entrance fee will be charged
	Paragraph 9-3.e: Second sentence is vague. Sentence should be rewritten to clearly state Congress and Corps management may or may not choose to allocate the funding back out to the lake where it was collected. Weren't we going to have 80% of collected fees returned to the site where collected without loss of appropriated funding? If so that statement needs to be in this paragraph	NWD	Would require legislation-ER deals with existing legislation; it is not a forum for proposed legislation
	9-3 e. It is clearly the intent to have fee monies returned to the project where collected, but this must result in an overall increase in the O & M budget for the project. This is by far the best way to reduce the maintenance backlog and to provide improvements. The return of SRUF monies to the project where they were collected should not be subject to the availability of appropriations. SRUF dollars should not have to be used for operations of the project. There is no incentive to collect use fees if the money returned to the project is used to reduce appropriations. The wording in the draft regulation suggests that the Corps is unwilling to actively pursue the appropriations required to operate and maintain a project and use the SRUF dollars for improvements as they are intended. The public has seen increases in fees and heard reports of record fee collections yet they see very little in the way of maintenance improvements or modernized facilities because we end up cleaning toilets and paying labor with our fee collections.	SWD	Would require change in OMB and Administrations thinking. This is not appropriate place to debate.
	9-3 Policy, paragraph e, Special Recreation Use Fees. Is this account over and beyond our regular O&M budget or is this money going to be incorporated into the budget as it use to be?	SWD	Until such time as legislation is passed, SRUF will remain part of O&M budget
	Paragraph 9-3.e., Page 9-2 – Although the verbiage within this paragraph is in large technically correct, it does not portray a clear picture of the reality of the user fee situation. Suggest that the second sentence of the draft paragraph be replaced with the following: "User fee receipts are returned to the project from which they are collected after a total of \$34 million in user fees has been collected across the entire program, minus the costs of administering the NRRS" contract. The current third sentence should be replaced with verbiage such as "Funds generated from collecting recreation use fees are used to offset O&M, General appropriations for operation, maintenance and improvement of recreation sites and facilities." The fourth sentence should be changed to read "The construction of new recreation facilities or renovated and/or improved existing facilities at projects with an existing user fee program may be accomplished with an amount of funds not to exceed the quantity of user fees collected if the goal of providing quality public recreation experiences with the most cost efficient management of water resource	LRD	"User fee receipts..." has expired in WRDA. The suggested verbiage says the same thing only using more words.

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

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	<p>projects can be met, it is necessary to accomplish Tier II performance goals, and the proposed work meets Budget Engineering Circular criteria for a given program year. New and/or renovated facilities may be constructed at existing projects currently not having an existing user fee program in order to establish a user fee program if the addition of such facilities is needed to accomplish Tier II performance goals and such investments may good business sense. The following sentence should be added as the last sentence, "Funds expended on the recreation program at any project during a given program year shall not be less than the total quantity of fees collected at that project in the preceding program year."</p> <p>9-3 6e. "Subject to availability of appropriations, funds shall be returned to the water resources development project at which the fees were collected..." We have not seen these funds return to our parks.</p> <p>f. <u>Public Relations</u>. "The purpose of offering free camping is as a short-term promotional effort" Delete. Bait and Switch techniques – not good to say free one year and then charge fee another year</p> <p><u>Paragraph 9-3.f.</u> The entire paragraph is vague. The whole paragraph should be rewritten in plain English.</p> <p>Paragraph 9-3.f. – The discussion should include the provision of free campsites for those performing "significant" volunteer work as an approved management option.</p> <p><u>paragraph 9-3.f.</u> The offer to limit free camping (free camping passes and coupons) for marketing purposes should not be limited to non-NRRS class B and class C campgrounds. Class A NRRS campgrounds should also be included where these passes and coupons can be used on non-reservable sites - especially in the off-season, when NRRS is not in effect. This tool could be used to increase utilization in these campgrounds during low use times (weekdays or winter) and thus entice and generate user interest in year round recreation</p>		
		NWD	May not have been available or more likely it is in your O&M budget and you just don't see it.
		NWD	Free-night camping coupon requested by several MSC's for marketing purposes.
		NWD	This is optional, not a required program,
		LRD	Include but not under Public Relations. Volunteers can already receive a free campsite
		SAD	Non-concur only campgrounds <u>not</u> in the NRRS/ can use free-night camping coupons for marketing.
9-4. General Fees	9-4 <u>General Fees.</u> A. Fee Schedules "District commanders shall assess seasonal visitation patterns of individual fee areas" Need a usable visitation program.	NWD	Agree- fix VERS
	9-4. General Fees, paragraph a. (page 9-2): Recommend adding, "fee schedule submitted and approved for the previous years do not have to be resubmitted, if the fees did not change."	SWD	Easier to submit two year schedule every year, in case of changes
	9-4a. - Why is the fee recommendation required every year when the recommendation is for two years? Also, fee recommendations should be required earlier due to NRRS requirements of fee schedule.	SPD	Law requires every year. Two year advance, due earlier (9/1) submit any time
	paragraph 9-4.a. - Fee Schedules: Approval of fee schedules should be powered down to the District Commander level. Since proposed fees are established using comparability studies conducted at the project level, it is extremely unlikely that the proposed fees would be changed or not approved at the MSC level. The MSC's role should be to ensure districts have a process in place for reviewing the comparability studies performed at their projects and that the fees being proposed are consistent with the outcome of those studies. Actual approval or disapproval of proposed fees should be at the District Commander level. Also, "Major Support Command" should be changed to "Major Subordinate Command".	SAD	HQ wants MSC approval. Agree with change to: Major Subordinate Command

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

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	9-4. General Fees, paragraph b (page 9-3). Recommend the first sentence to be changed to "Fees charged shall be based upon distinguishable differences between Corps facilities and services and those facilities and services provided by other Federal agencies, non-Federal agencies, and the private sector in the same service area."	SWD	Concur- Will do for comparability, services weigh in-trash pick up, ranger patrols, 50 amp vs 30 amp, etc.
9-5 Camping Fees	paragraph 9-5, Camping Fees – Discounted camping fees charged Golden Age/Golden Access Passport holders should only apply to the fee for the basic campsite. All amenities (premium location site charge, electric, sewer and water hookups, etc) should not be discounted so that the passport holder pays the full rate.	LRD	Can't change separately for utilities but should be factored into fee.
	paragraph 9-5. - Camping Fees: A brief paragraph needs to be added to this section that addresses "Free Camping Passes", as described in paragraph 9-3.f.(3) of EP 1130-2-550. Nowhere in the ER are these new passes discussed.	SAD	Details are in EP, not ER. Passes discussed in 9-3.f.
	Paragraph 9-5.c. - Holidays should be mentioned in the discussion.	LRD	Concur
	9-5 Addressing the concepts of carrying capacity, variable pricing, utilities, and visitors are useful guidance.	SWD	Thank you
	9-5. Camping Fees. d. Utilities. ..."No free utility services shall be provided." Statement not necessary.	NWD	It is necessary to state policy
	9-5. Camping Fees, paragraph e (page 9-3). Recommend last sentence to state, " If charged, the fee shall not exceed 50 percent of the single user unit campsite fee and the sites established carrying capacity shall not be exceeded."	SWD	9-5 b covers carrying capacity
	9-5 Camping fees, paragraph e, Visitors (page 9-3). It states you may charge use fees for use of specialized facilities, not more than 50 % of the single user unit campsite fee. Please define specialized facilities. Is the intention not to define specialized fees to allow latitude in charging fees for what you the manager constitute as specialized?	SWD	"Specialized facilities" is in law but not defined-want latitude to incorporate new, great things.
	9-5 e: Visitors, It states you may charge use fees for use of specialized facilities, not more than 50% of the single user unit campsite fee. Please define specialized facilities??? Or is the intention not to define specialized fees to allow latitude in charging fees for what you the manager constitute as specialized.	SWD	Yes, see above comment
	Chapter 9, Paragraph 9-5.f. - The second sentence states that a camping permit will also entitle the holder to use any or all day use facilities without paying additional use fees at the same project, on any day for which the permit is valid. This sentence should be clarified to indicate "...any or all Corps operated day use facilities without paying additional use fees at the same project, on any day for which the permit is valid."	LRD	Concur- changed
	paragraph 9-5.f.: Does this provision apply to those who have paid a visitor fee (campground) as well?	SAD	Concur-changed
9-6 Day Use Fees	The numbering hierarchy in sub-paragraphs of 9-6 of the ER is confusing and difficult to follow. It might be helpful to further indent sub-paragraphs.	LRD	IM regulations require this format
	<u>Section 9-6:</u> This entire section has been written and numbered in a very confusing manner and many sections don't follow the subject of the section standing above. We suggest that all of section 9-6 be rewritten, divided up and renumbered.	NWD	Concur-changed

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

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	9-6 The alternative to charge on an area basis will allow flexibility to determine best collection method(s).	SWD	Concur-changed
	Paragraph 9-6 a. - Pertaining to sale of Annual Passes. One district within LRD objects to the proposal of limiting the purchase of a duplicate pass to the time of the original pass sale. Suggest implementing the practice used in the Huntington District of marking a "D" on the face of the original pass receipt when a duplicate is purchased. This allows the pass holder to purchase a duplicate at any time as long as he or she can produce their copy of the original receipt. Also, suggest that the face of the pass be redesigned to allow the vehicle license plate to be written on the face of the pass. This will provide rangers with a tool to quickly match the pass with the vehicle when needed. It would also deter the user from allowing others to use his/her pass knowing the license numbers would not match.	LRD	Not feasible to redesign, not enough room, too hard to check when on mirror. Purchase of duplicate Annual Pass is allowed at a later date if original receipt showing no duplicate has been purchased is presented at original purchase location.
	Paragraph 9-6 a. (1) - The MSC should have authority to determine whether or not it is appropriate to collect boat launching fees using the same criteria established for day use fees.	LRD	CONCUR
	9-6, 1 In our case the revenue is marginally exceeding the cost of collection and continues to decrease. We were not in compliance with the previous regulations and changing the verbage in the new regulation will not change the situation in the field. At what point are we generating enough revenue for it to be a benefit?	NWD	The collection costs are estimates. Revenues are more exact can still charge fees if it seves a management purpose and MSC approves.
	9-6.a.(1): The word "estimates" should be removed from the last sentence of this paragraph. Actual cost and revenue data should be reviewed periodically.	SAD	See para. 9-6 a.(1)- you can quit collecting when collection costs exceed revenue but may impact other
	Paragraph 9-6.a(2): What criteria do we use to determine which boat ramps are "certain"? Is there a criteria or is it a management decision – if it is a management decision, the paragraph should state the District Engineer will determine which boat ramps will have a launch fee.	NWD	Concur-criteria has been added (must have more than a ramp and courtesy dock)
	9-6-2 Charge for certain boat launching ramps? Define Certain?	SWD	See above
	paragraph 9-6.a.(2): There is a discrepancy between this paragraph and paragraph 9-6.c.. One says "over the age of 12" while the other says "under the age of 12". What about those children that are 12?	SAD	Corrected to say 12 and under
	Paragraph 9-6.a(3): The opening sentence in Paragraph 9-6.a states "Criteria. Fees will be charged for the use of Corps operated day use facilities meeting the requirements below." Based upon this opening sentence for the section Paragraph 9-6.a(3) is not a stand-alone statement since it is in fact a "fees will not be charged" statement. Suggest either changing the opening sentence found in Paragraph 9-6.a or placing Paragraph 9-6.a(3) in and as a part of paragraph 9-6.a(1).	NWD	Changed
	Paragraph 9-6.a(4): Under what circumstances would a "per facility fee" be charged? The two options identified in this section are not clear and should be explained through an example.	NWD	Changed: added explanation
	9-6. Day Use Fees. a. Criteria (4) Fees will be assessed either on a per facility basis or a per recreation area basis at any particular area. Both alternatives will not be used within a single area. Comment: interesting	NWD	Concur
	Paragraph 9-6 a. - The option of charging a day use fee on a per area basis should be more adequately explained, or as a minimum, reference should be made to the memorandum that originally announced and explained the option in detail.	LRD	Concur ER supercedes policy memorandum

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	Paragraph 9-6.a (4) - Paragraph 9-6.a.(4) of the ER states that fees will be assessed either on a per facility basis or a per recreation area basis of any particular area, but that both alternatives will not be used within a single area; and	LRD	
	Page 9-4, paragraph 9-6.a.(4): Both the per recreation area fee and the per facility fee should not be used at the same time, but it is appropriate to use the per facility fee in lieu of the per recreation area fee when a portion of the area is closed during the off-season. For example, when a swimming area is closed but the boat-launching ramp remains open in the winter months, it is still appropriate to charge a fee for use of the boat-launching ramp.	SAD	Agreed, you can do it
	(a)(2) The area fee will not exceed \$4 per vehicle or \$1 per person, if walking into the area. Comment: We could switch to area and charge \$3 for use of both the beach and /or the ramps.....	NWD	OMB has directed Corps to increase revenue.
	9-6a(4)(a). Explain the difference between an entrance fee and charging a fee for the use of day use facilities in an area (I.e. picnic tables, trash disposal, restrooms, nature trails, primitive athletic field, etc.), not including launch ramps and swim beaches.	SWD	Cannot charge a fee for the use of day use facilities that do not include a boat launch ramp and/or swim beach
	9-6-a-4a: I am sure there is an excellent explanation on this, but since there is no definite definition of a per facility basis or per a recreation basis makes I am not sure what it represents in definitions in charging fees.	SWD	See above
	Paragraph 9-6.a.(4)(a)(2) of the ER states that the day use fee will not exceed \$4 per vehicle; and Paragraph 9-6a.(4)(b) of the ER again states that the day use fee will be no more than \$4 per vehicle; and Paragraph 9-6.a.(4)(b)(1) of the ER states that a \$3 fee will be charged to use a boat launch ramp in a day use area that contains recreational facilities (including swimming facilities); and Paragraph 9-6.a(4)(b)(2), pertaining to developed swimming beaches, states a \$4 per vehicle charge, but goes on to state that if a vehicle has more than eight passengers, there will be a fee of \$1 for each additional individual over the age of 12. Question: If a group of individuals pays \$3 to launch a boat in a developed recreation area, does that allow them to use the other facilities? Question: For consistency's sake, wouldn't it be more appropriate to either use a \$4 maximum fee for d Question: For consistency's sake, wouldn't it be more appropriate to either use a \$4 maximum fee for day use areas and beaches, or to charge the additional \$1 per additional person over the maximum vehicle occupancy of 8 passengers at day use areas as well?	LRD	Concur
	paragraph 9-6.a.(4)(a)(2): Commercial vehicle vs. non-profit vehicles (e.g. scouts, Boys and Girls Clubs, schools) is not addressed in current policy memorandum dealing with the alternative recreation area fees. Projects should have the discretion to waive day-use fees for non-profit groups. Private tours, commercial summer camps, etc, should be considered commercial and all persons twelve and over charged \$1.00, with no maximum fee per vehicle limit.	SAD	Concur
	Paragraph 9-6.a(4)(a)(1 through 3): These three sections seem out of place here. They appear to be stand-alone and should have their own separate section.	NWD	Concur-Section reorganized
	9-6.a. (4)(a)(3): How do annual passes affect walk-in customers? Or, if I have an annual pass, live nearby and choose to walk into a recreation site with my family, would they be covered? If not, shouldn't walk-ins be afforded the same benefits as drive-in visitors?	SAD	

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

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	(b) Fees assessed on a per facility basis allow for more detailed tracking of revenues. In no case will the total day use fee collected be more than \$4.00 per vehicle per day. Comment: A new maximum. Up from \$3/vehicle /day	NWD	Correct
	Paragraph 9-6.a(4)(b): This paragraph seems unnecessary – what is it's purpose? The information, if necessary, should be included in other sections.	NWD	Concur-Section reorganized
	(b) (1) A day use fee of \$3.00 will be charged to use a boat launch ramp in a Corps operated day use recreation area Comment: A mandated increase to \$3 for ramp use.	NWD	Correct
	9-6-b-1: What if someone comes to visit a camper and visitors fees are not charged. As the visitor they bring a boat that they are going to launch from within the campground to use for the day with the campers ? The way it reads you can not charge for the use of the ramp as a launching fee.	SWD	Concur-They should be charged
	Paragraph 9-6.a(4)(b)(1): This, like paragraph 9-6.a(3) doesn't conform to the opening sentence of paragraph 9-6.a. "Criteria. Fees will be charged for the use of Corps operated day use facilities meeting the requirements below.". Suggest eliminating this paragraph and including the information elsewhere or breaking up this entire section to better reflect all the information being conveyed. A boat launching user fee of \$2.00 is more appropriate for our region of the country. Suggest allowing each district authority to set their own fees.	NWD	Concur with first cmt. Boat launch fees may not be set by the District.
	9-6. Day Use Fees, paragraph a(4)(b)i, (page 9-4). The day use fee of \$3.00 being charged to use a boat launch ramp will cause lots of "change" (Golden Age/Access Passports/ 50 % off) and will increase violations at the self-pay station, as many may not have change. An even dollar amount would be preferred, like \$4.00 or \$2.00.	SWD	Non-concur fees can be adjusted to reflect increases in CPI.
	(b)(2) ... If a vehicle has more than eight passengers, there will be a fee of \$1 for each additional individual over the age of 12. Comment: This is very confusing , but in light of (b) above .. no more than \$4 /vehicle...	NWD	Concur-changed
	Paragraph 9-6.a(4)(b)(2): The relationship between the first and second sentence is unclear. One of those two sentences needs to make clear that vehicles with seven or fewer passengers will be charged \$4. The second sentence speaks of each "additional" person yet doesn't say additional to what – we assume the first seven, but it is not clear. The age criteria (over the age of 12) is very difficult to determine in the field without seeing identification. This part of the paragraph should state fee collectors will accept age statements without requesting additional evidence or identification. This statement should make it clear that fee collectors should not be trying to "catch" everyone based on the subjective appearance of older or younger than 12. Field comments on this entire paragraph indicate it needs significant reworking.	NWD	Concur-changed
	9-6 Day Use Fees, paragraph a(4)(b)ii, (page 9-5). The same situation above applies to proposed change to daily fee for swimming beaches. Recommend to increase the daily swimming beach fee to \$2.00 per person, and after applying Golden Age/Access discount, the fee is \$1.00.	SWD	Can't do because of CPI
	9-6 Day Use Fees, paragraph a.4.(b)ii, (page 9-5). This paragraph contradicts itself. First it says you can charge \$1.00 per person but no more than \$4.00 per vehicle. Then it states if there are more than 8 people you can charge an additional \$1.00. Which is it, maximum \$4.00 or is it \$4.00 up to 8 people with an additional \$1.00 for each person?	SWD	Done

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	9-6-b2: this paragraph contradicts itself. First it says you can not charge \$1.00 per person no more than \$4.00. Then it states if there are more than 8 people you may charge an additional \$1.00. Which is it maximum \$4.00 dollars or is it \$4.00 up to 8 people with an additional \$1.00 for each person???	SWD	Done
	Paragraph 9-6 a. (4)(a) and (b) - In paragraph 9-3. Policy, criteria is identified for consideration in setting fees. One of those considerations is the comparability within the service area of the management unit. Does this consideration along with the others listed not apply to setting day use fees? In the legislative language furnished in EC 1130-2-204 back in 1994, it stated that the amount charged per vehicle shall not exceed \$3.00 per vehicle per day and this amount may be adjusted annually by the Secretary for changes in the Consumer Price Index of all Urban Consumers published by the Bureau of Labor Statistics of the Dept. of Labor. What authority and criteria is being used to increase these fees. Was an analysis done? Strongly suggest more information be provided to the districts on this increase before finalizing. The proposed increases include 20% for the Annual Pass and 150% for the duplicate pass. There is no support in this district for any of the increases proposed for Day Use Fees, especially without any input or explanation. We believe that increasing the amount of the Annual Pass will only discourage s and increase our work of dealing with more drop box payments of dealing with more drop box payments.	LRD	Authority-CPI for all Urban Consumers published by Bureau of Labor Statistics- Yes, analysis was done.
	Paragraph 9-6 a. (4) (b) and (4) (b) (2) - The first referenced paragraph states "In no case will total fees collected be more than \$4.00 per vehicle per day", and in the second referenced paragraph it allows for an additional charge per vehicle when it exceeds eight persons. Suggest rewording so these two paragraphs do not conflict. Also, would the extra dollar apply to locations charging on the "per area" day use fee option? Again, suggest information be provided to districts on these type of changes prior to implementing.	LRD	Concur-changed
	9-6, 3b2 "A day use fee of \$1.00 per person, whether walk-in or in a vehicle, up to \$4.00..." This is too complicated for both enforcement and for the public. We need a flat fee for vehicles, regardless of how many people are in the car.	NWD	Concur-changed
	There appears to be some conflicting language in ER paragraphs 9-6.a.(4)(b) which states "In no case will the total day use fee collected be more than \$4.00 per vehicle per day" and 9-6.a.(4)(b)(2) which states "If a vehicle has more than eight passengers, there will be a fee of \$1.00 for each additional individual over the age of 12".	NWD	Concur-changed
	paragraph 9-6.a.(b)(2): The first two sentences of this paragraph are not consistent with each other. The first sentence indicates a day use fee of \$1 per person will be charged up to a maximum of \$4 per vehicle. Whereas the second sentence indicates that if there are more than eight people in the vehicle and additional \$1 per person will be charged for those over the age of 12. Example: Assume there are 12 people over the age of 12 in a vehicle. According to the first sentence only \$4 should be charged. According to the second sentence \$8 should be charged. This needs to be clarified. Suggest that counting the number of people in a non-commercial vehicle is not worth the effort and we should only collect a maximum of \$4 per vehicle.	SAD	Concur-changed
	(c) An Annual Day Use Fee Pass may be purchased for \$30.00, ... Comment: This is a \$5 increase.	NWD	Yes it is

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	Paragraph 9-6.a(4)(c): Annual Pass cost should remain at \$25.00.	NWD	No, CPI says to raise
	9-6. Day Use Fees, paragraph a. 4. (c), (page 9-5). Recommend adding the words, "Golden Age/Access discounts apply."	SWD	Concur-changed
	9-6. Day Use Fees, paragraph a(4)(c)iv, (page 9-5). Annual passes may be sold through the mail. (This should be optional for the Districts) Fort Worth District has had problems with handling annuals through the mail with our citation program, so this would not be successful at all projects.	SWD	It is optional-says "may"
	paragraph 9-6.a.(c): Does the additional \$1 per person fee, when there are more than eight people over the age of 12 in a vehicle (described in paragraph "d", above), also apply to annual pass holders? If not, it needs to. Otherwise we are not assessing fees consistently.	SAD	Concur-changed
	An Annual Day Use Pass may be purchased for \$30.00, which permits the holder and all accompanying passengers in the vehicle to use any or all boat launch ramp and/or designated developed swimming beaches at any Corps operated recreation area at they Corps project for that calendar year. THE PASS SHOULD BE AFFIXED PERMANENTLY TO THE VEHICLE.	NWD	Concur
	9-6, Paragraph (C) (ER) explains where the annual day use pass can be affixed to the vehicle. There seems to be quite a bit a latitude to it's location which in turn makes it much more difficult for the ranger to locate on the vehicle. Any way to keep it on the mirror or windshield and forget the bumper? Maybe we should have them attach it to the "upper left forehead"? Thought you might be ready for a little humor!	NWD	On the rearview mirror is the preferred location but not all vehicles have an interior mirror.
	(c)(3) A Golden Age/Access discount may be applied to annual passes purchased through the mail if the applicant furnishes a photocopy of their Golden Age/Access Passport. Personal check will be the only method of payment for Annual Passes purchased by mail. Comment: This is a major change from past practice, which requires the passport holder to be physically present at the use of the passport. This will allow some fraud...	NWD	Customer service-what the field wants.
	Paragraph 9-6 a.(4) (c) (3) - Requiring only a photocopy of a Golden Age Passport would not be sufficient to discourage fraud. Golden Pass discounts should not be applied to annual passes purchased by mail.	LRD	Nothing is 100% failsafe
	Paragraph 9-6.a.(4) (c) (3) and Paragraph 9-5.b.(4) of the EP - Verbiage indicates that personal checks will be the only method of payment for Annual Passes purchased by mail. Suggest that money orders and credit cards be included as methods of payment. Credit card information could be taken over the phone, or a copy of the card could be faxed or emailed (scanned attachment) to the project. We should also utilize all electronic means available to serve the customer. With approval to accept credit cards, recommend replacing the 2nd sentence of EP Paragraph 9-5.b.(4) with, "Annual passes may be sold by fax, phone, mail, or email with a Golden Age/Golden Passport discount if a copy of the individual's Golden Age/Golden Passport accompanies their application via email (scanned attachment), faxed, or mailed photocopy.	LRD	Will add credit card as payment option. No credit card number via email- not secure. Will add fax.
	9-6(c)(3) For mail in requests, can a certified checks or money orders be used to purchase a Golden Age Golden Access discounted annual day use pass?	NWD	Yes
	paragraph 9-6.a.(4)(c)(3): When allowing the purchase of an annual day use pass through the mail using a Golden Age/Access Passport, some official proof of identification (ie. Copy of state drivers license), should also be required.	SAD	GA/GAP good enough-Can ask for more ID at any time

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	9-6 c. If the revenue from annual pass sales truly came back to the project that sold them, there would be incentive for increased marketing.	SWD	Agreed
	paragraph 9-6.a.(c)(3): This paragraph indicates that a personal checks is the only method of payment for Annual Passes purchased by mail. Money orders and cashiers checks should also be acceptable methods of payment.	SAD	Concur-changed
	(c) (4) Annual passes may also be purchased over the telephone with currently accepted bankcards. Golden Age/Access discounts do not apply to these purchases. Comment: If the photocopy method is used in(c) (3) above, the use of a faxed copy followed by credit card would logically follow...	NWD	Concur-changed
	(c) (5) An additional annual pass may be purchased for a reduced fee of \$15.00 for a second vehicle of the purchaser. Only one duplicate pass may be purchased at the \$15.00 fee for each full price annual pass purchased and must be purchased at the same time as the original pass. One decal will be identified at the time of purchase as a duplicate by punching a hole or marking an "x" in the box marked "D". Comment: The increased duplicate pass price of \$15 will decrease such purchases. The requirement of duplicate pass purchase at time of original purchase will also decrease purchases , but will likely reduce fraud...	NWD	Concur-changed
	We disagree with the new requirement that the "duplicate" day use pass must be purchased at the same time as the original "Annual" day use pass. Most folks, myself included do not carry around the license tags of my other vehicles. We don't see why we need this change in the first place. The \$15.00 fee should be a fee just to cover the admin. costs of issuing it. It will take the same amount of time to issue it whether it's done with the original pass or at a later date.	NWD	Concur-changed
	Paragraph 9-6.a(4)(c)(5): Additional pass charge of \$15.00 is excessive. Suggest retaining \$5.00 charge for second pass.	NWD	Non-concur
	OK on the increase to \$30.00 for the Annual Pass but would rather see a \$10.00 duplicate fee rather than the \$15.00. \$15.00 seems a bit high just for a duplicate and makes for problems giving change to the customer when they have a Golden Age or Access passport.	NWD	Non-concur
	9-6.c.(5) – Duplicate annual passes should be able to be sold anytime if the original pass receipt is held as proof and marked or punched after purchase.	SPD	Concur-changed
	Paragraph 9-6.a.(4)(c)(5)- The ER indicates a \$10 increase in the cost of a duplicate annual pass (from \$5 to \$15). AT least one LRD district anticipates strong negative public reaction to such an increase. Since these passes are purchased at the same time as the initial pass, it is difficult to explain to the public why this increase is necessary since there is no significant additional administrative burden from the standpoint of processing the sale. Recommend with the increase to \$30 for an Annual Pass, that the cost for a duplicate be raised to no more than \$10. An incremental increase to \$15 could be incorporated into the document for future use.	LRD	Non-concur

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-6, (c)(5) – (Duplicate passes) When a duplicate pass is purchased with the original pass and the sale is documented on the white and yellow receipt copies, there is no need to mark or punch the decal as a duplicate. Once it is placed on the vehicle, the fact that a pass is a duplicate is of no consequence. This space on the decal could be used to show the vehicle license number, something that is of more value to the ranger when checking for passes. The duplicate indication on the pass decal serves no purpose.	LRD	Non-Concur space not available for license plate number denoting "duplicate" on the decal can prevent conflicts later on.
	OK on the increase to \$30.00 for the Annual Pass but would rather see a \$10.00 duplicate fee rather than the \$15.00. \$15.00 seems a bit high just for a duplicate and makes for problems giving change to the customer when they have a Golden Age or Access passport.	NWD	Non-concur
	(c) (6) Annual passes removed from vehicles that have been sold or destroyed will be replaced at no charge if the original pass is returned. In the absence of a returned pass, the full fee will be charged for a new annual pass. Passes lost due to vehicle theft will be replaced at no cost if proof of theft, such as police report or insurance document is provided. Comment: A GOOD addition!!	NWD	Thank you
	Paragraph 9-6.a(4)(c)(6): Add the following at the end of first sentence "... or office records confirm purchase of an original annual pass.	NWD	Non-concur- too much chance for fraud
	paragraph (6): Passes lost to vehicle theft should also be expanded to include "fire or other total loss"... "if proof of total vehicle loss, such as a police report or insurance document is provided."	SAD	"Sold or destroyed" covers this.
	Paragraph 9-6 a. (4) (c) (6) b. - It should be clearly stated that this section applies only to Corps facilities within reservation lands.	LRD	Non-concur verbiage per HQUSACE
	ER paragraph 9-6.b. discusses a waiver of fees for Native American Indian Tribal members. What mechanism would be used to provide identification for the vehicles of these individuals?	NWD	Up to District Commander to address
	Re. comment pertaining to Paragraph 9-6.a.(6)b., Native American Indian Tribes. The section states that District Commanders may waive day use fees for Federally recognized Native American Indian Tribal members. It should be made clear in the regulation that this section applies only to those Corps facilities within reservation lands. If this is not the case, then we recommend that it be deleted unless we are directed by law to do so.	LRN	Non-concur-cannot delete per HQUSACE
	Section 9-6: This entire section has been written and numbered in a very confusing manner and many sections don't follow the subject of the section standing above. We suggest that all of section 9-6 be rewritten, divided up and renumbered.	NWD	Concur-changed
	9-6, Paragraph (C) (ER) explains where the annual day use pass can be affixed to the vehicle. There seems to be quite a bit a latitude to it's location which in turn makes it much more difficult for the ranger to locate on the vehicle. Any way to keep it on the mirror or windshield and forget the bumper?	NWD	already explained previously
	9-6 paragraph c, (page 9-6). Recommend changing the word "made " to "charged." (Children. No day use fee will be charged for children 12 years of age.)	SWD	Concur-changed
9-7 Special Use Fees	Paragraph 9-7: Rewrite title to "Facility Use Fees, Event Fees and Activity Permit Fees". Use of the word "Special" is non-specific and confusing. The word "special" should be remove from all subsequent sections and discussions.	NWD	Non-concur- too wordy

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	Paragraph 9-7.a: The charging of a facility use fee plus the individual day use fee is vague in this paragraph. Should be rewritten to state that groups will be charged the reservation fee plus the individual day use fees for the area.	NWD	Non-concur-explains both situations
	Paragraph 9-7.b: Contradiction between last sentence in this paragraph with the fourth sentence in paragraph 9-9.a(3). For Special Facility Use Fees paragraph 9.7.b states "Since this is a use fee, Golden Age and Golden Access discounts apply." Paragraph 9-9.a(3) states Golden Age and Golden Access discounts do not apply to Special Event, Special Activity or Special Facility Permit fees. Hard to say which is the correct statement.	NWD	Concur-changed
	There appears to be an error in the wording of Paragraph 9-7.b. (at the top of page 9-8). It states, "Designated, improved parking spaces must be provided elsewhere in the part of charge separate parking fees." (emphasis added)	LRD	Comment not understood
	We concur that Golden discounts do not apply to special facility fees. The statement that the Golden Age and Golden Access discounts apply to special Facility Use Fees is contradicted in paragraph 9-9 a (3), "Golden Age or Golden Access discounts do not apply to special Activity or Special Facility Permit Fee". 9-7 b. establishes the reservation fee for the special fee for special facilities as a "use" fee instead of a permit or reservation fee. If it is a use fee, does this establish the ability to prohibit use of pavilions without a fee? Either way we do not need to extend the discount to special facilities.	SWD	If all members of the group have GA/GAP, then the discount applies
	Paragraph 9-7 b. - It should be made clear that Golden Pass discounts do not apply to group use fees unless all members of a group have such passports (as specified in Paragraph 9-9a. (3).	LRD	Concur
	b- Special Facility Fee: If I am assuming this is a Group Day Use Shelter/Pavilion as it states why are we allowing the Golden Age/Access to be used. Previously it was decided that if everyone in the group did not have a Golden Age Card that the discount would not apply. c. Then in this paragraph you state that the discount does not apply to Special Event Fees. What is the difference? They are both Special Fees? The Golden Age/Access should not count on any Special Use Fees.	SWD	See above
	Paragraph 9-7 a & b - Paragraph a. states "charging of a fee for the reservation of a specialized facility", where as paragraph b. states, "charging for the use of a specialized facility" and that it is a use fee. There appears to be a conflict between a fee to reserve a shelter and a fee to use a shelter. Since the practice of charging for shelter reservations began back in the early 80's, we have always told our customers that they were paying for the reservation and not the use of the shelter. If this is a change it should be explained. If so it also brings up the question of use of the fee symbol sign in an area that has shelters or other facilities for reservation/paid use. Currently the shelter signs do not include fee symbol. This would relate to paragraph 9-3. b. pertaining to posting the fee symbol sign. Suggest clarification on the conflict of use vs. reservation for special facilities and applicability of fee symbol sign to special facilities.	LRD	Fee symbol sign should be at entrance to park, not at each facility. A. permits charging of use fee and a reservation fee. b. addresses only the use fee

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	Paragraph 9-7.b. - The draft states that Golden Age and Golden Access discounts apply to Special Use Fees. Paragraph 9-8.a. of EP 1130-2-550 (EP) states that the discounts do not apply to group use fees unless all members of a group have such passports. Paragraph 9-9.a.(3) states that Golden Age Passport or Golden Access discounts do not apply to Special Event, Special Activity or Special Facility Permit fees. This is confusing. Current regulations have been interpreted to mean that entire groups of picnic shelter users must be Golden cardholders in order to qualify for the discount. If shelters can be rented by one cardholder for use by a group that does not qualify for the discount as a whole, there will be a significant loss of our current shelter revenues. Recommend that this be clarified.	LRD	Concur
	ER paragraph 9-7.b. states that group picnic shelter fees are subject to Golden Age/Access discount. Paragraph 9-9.a.(3) states that the discount does not apply to group use fees unless all members of the group have such passports. We believe that group shelters should not be given the discount due to the potential for abuse and the fact that very large groups are involved and a small percentage may be eligible for discount.	NWD	Chances of all members having a GA/GAP is slim but it can happen.
	9-7. b. – Special Facility Use Fee: This paragraph indicates that Golden Age/Access discounts apply. However, page 9-8, paragraph 9-9.a.(3), indicates that the discount does not apply. If the discount is allowed, shouldn't everyone in the group be required to have a Golden Age/Access Passport?	SAD	Concur-they all need one
	(9-7 b) discussing Special Use fees (group shelters) is confusing. Paragraph 9.7 b. seems to contradict 9.9 (3). 9.7b. states in part that "Since this is a use fee, Golden Age and Golden Access discounts apply." This statement appears to be in disagreement with 9.9(3) which states that the reduction applies only if all users are golden age/golden access holders.	NWD	non-concur but rewritten
	9-7.c. - The minimum Special Event Fee of \$50 is too high. Historically we have had a range of from 0 to \$100. Many of our projects have 25 to 30 small bass club tournaments (>15 boats) every year and charge them less than \$50 which is fair given their impact on our operations.	SPD	Non-concur-Meets OMB initiative
	Paragraph 9-7.c. - The draft ER establishes \$50 as a minimum Special Event Permit Fee. Suggest that Districts be given authority to charge less than \$50 when the use is so minor in nature that it requires little or no effort on the part of project staff (i.e., wedding ceremony held at project site).	LRD	If it's a minor event, don't issue a special event permit
	9-7 c. We wholeheartly endorse increasing the special event permit fee to \$50. We would like to see the rregulation be very specific about application for an event that may occur over a period of many days. For example, some fishing tournaments are set up to occur each, Tuesday night for 6-8 weeks. Should one special event permit application fee cove all these nights? USACE should issue a nationwide news release informing the public of the increase in the cost of Special Events Permits. We do notg want to leave it up to the local project offices to take all the heat on this issue.	SWD	See appendix N
	Paragraph 9-7.c. - What criteria is being used to justify the increase? Suggest providing this information to the districts and waiting until Appendix N (not provided), can be reviewed before finalizing any fee increase for Special Event Permits.	LRD	It has never been raised since it started.
	Special events - states a permit fee of \$50 MAY be charged. Will there be a sliding scale, or flat fee of \$50.	MVD	Appendix N allows you to charge more than \$50.00.
	Paragraph 9-7.c(2): Appendix N of the referenced EP doesn't exist	NWD	It is in the reg now but is being rewritten.

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	Paragraph 9-7.c and .d: What is the difference between an Event Fee and Activity Fee? This is not clear and should be clarified by examples.	NWD	Examples are included in EP and appendix N
9-8 Other Equipment, Facilities, and Services	Paragraph 9-8: Are the "other" fees identified in this opening paragraph limited to campgrounds only as in the paragraph 908.b below? This isn't clear and needs clarification.	NWD	No 9-8, 9-8b.
	Paragraph 9-8 - It should be made clear that the Golden pass discount does not apply to firewood, ice, laundry machines, and equipment rentals.	LRD	Concur
	9-8 Other Equipment, Facilities and Services: What about sporting equipment??	SWD	Yes, it can be rented out
	paragraph 9-8, Other Equipment, Facilities, and Services: Are fees charged for equipment, facilities and services in recreation areas or campgrounds considered recreation use fees? Since these items are included in the Draft ER under Chapter 9 Recreation Use Fees, one would consider them recreation use fees. However, this conflicts with CEFMS accounting guidance that specifies firewood and ice, sales and laundry fees are not considered recreation revenues and are to be accounted for as miscellaneous income or "other fees". Also, in draft EP 1130-2-550, paragraph 9-9.c., guidance indicates that all income derived from fee collection will be deposited into Special Receipt Account 96-145005.4 (96 x 5007). Does this include fees for equipment, facilities and services? A statement should be added to this paragraph and paragraph 9-7 of the draft EP that indicates Golden Age/Access discounts do not apply.	SAD	NRRS POS items are automatically credited to the correct accounts. Non-NRRS parks should follow CEFMS guidance. Covered in 9-9 of EP.
	Paragraph 9-8.a: Last sentence, replace the word "charges" with "charged".	NWD	Concur
	ER paragraph 9-8.a. indicates that a separate fee for showers should not be charged individuals that have already paid a camping fee. Due to the design of our recreation areas, day users and campers share many facilities. It would not be possible to distinguish between the users of the showers (which now are all fee).	NWD	
	9-8. Other Equipment Facilities and Services paragraph b, (page 9-7). This policy is in conflict with our newly established extra vehicle fee as most of our parking is located at sites.	SWD	Corps charges by site, not vehicle. Extra vehicle fee is for alternate parking spaces.
9-8, b. "Parking fees in campgrounds may be charged for users' vehicles parked in designated, improved parking spaces other than the campsite. No separate parking fees may be charged for user vehicles parked on the campsite in accordance with the established vehicle carrying capacity." Charging extra vehicle fees (all vehicles that are not the main camping unit) regardless of where they park, including the camp pad, is consistent with what other agencies in our area is charging (per the fee comparisons). Other agencies charge a main camping unit fee and \$5-\$7 fee for all extra vehicles. Where the extra vehicle parks, should be a local management decision, not a nation-wide regulation. Extra vehicle fees is a management tool. The carrying capacity for each site is the amount of people. Site length and type determines how many cars can be at that camp pad. There is minimal opportunity for "overflow parking" in established parks. Eight people are allowed on each site, they can drive out in one van (our preference for wear on the roads, traffic in the park, contact at the gatehouse upon entrance) or they can each drive	NWD	HQ policy - carrying capacity of site should be determined before fee for that site is set	
out separately in 8 vehicles. The extra vehicle fee is a management tool to curb the amount of vehicles that enter our park. Each vehicle entering the park should be charged a fee for the time it takes a gate attendant to process their permit, the time it takes to maintain records on vehicles in the park, traffic control and wear and tear on the road.			

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
9-9 Discounts	9-9.a.(1). "Permanent Residents" needs to be defined. We have had Canadian citizens with only a Canadian driver's license show up with Golden Age/Access cards. They indicated they received the cards because they were permanent residents (spent more than 6 months out of the year in the United States). If this cannot be easily defined can we remove the wording "permanent residents" from the eligibility statement.	SAD	Per DOI language, not necessary
	9-9 a (1). Are there plans to develop a Corps-wide database for the Golden Age Passports? Presently, there is no reasonable way to keep up with them once they are issued.	SWD	No, not feasible or cost effective.
	9-9. Discounts. a. (2) Free, lifetime Golden Access Passports... Suggest adding: That like Golden Age passport applicants, Golden Access	NWD	No, Golden Age passport is not like Golden Access
	9-9 a (2). Are there plans to develop a Corps-wide database for the Golden Access Passports? Presently, there is no reasonable way to keep up with them once they are issued.	SWD	Nonconcur, not cost effective
	Paragraph 9-9.a(3): Second from last sentence lists a "Special Facility Permit Fee". There was a "Special Facility Use Fee" identified in the previous section, but no "Special Facility Permit Fee". We strongly recommend elimination of the word "special" from this document and refer only to the types of fees such as a Facility Use Fee.	NWD	Concur-eliminated "special facility permit."
	Paragraph 9-9 a. (3) - This paragraph indicates that the GAPPs do not apply to Special Facility Permit Fees. Paragraph 9.7b. indicates that GAPP discounts do apply. This is either a conflict or not written clearly as to the intent. In the past, group shelters were assumed to be special facilities, and a GAPP discount could be obtained if all members had one (which has never happened or probably never will). Suggest changing the wording to Special Facility Use Fee instead of special Facility Permit Fees.	LRD	Concur
	ER Page 9-8 & EP Page 9-8, Golden Age/Access Discounts for Group Areas. States the discount is only applicable if all members of the group have a card. Is this only in NRRS areas or does it apply to group areas not in NRRS such as Class "B" group areas?	MVD	All areas where fee is charged
	Chapter 9-9 Discounts Page 9-8: (4) The duplicate must be purchased at the same time as the original pass.....include in here "by the same individual."	MVD	Non-Concur-change made to allow purchase of duplicate later
ER Page 9-8 & EP Page 9-8, Documentation of GAP's and GAC's issued. Both state that ENG Form 4840 will be filled out for each issued. This is in addition to recording them on ENG Form 4468-R. I hope what they meant to say is that the 4840 will be filled out if the person doesn't have proper documentation. If they actually said what they meant, it's ridiculous. Further, I don't think we should use the form for issuing Access cards. They should be able to provide proof of disability in order to receive a lifetime of discount.	MVD	Concur must use form 4840 per HQ if proof is not presented.	
9-10. Accounting	Paragraph 9-10.b: Clarification between the first and second sentences is needed. Suggest "Refunds for recreation use fees may be authorized for legitimate reasons at the discretion of the Operations Manager and will be made through a letter request to the district office. No refunds may be made at the lake."	NWD	Nonconcur-not in accordance with NRRS
	9-10 Accounting, paragraph d, Refunds (page 9-9). Recommend last sentence to read " NRRS Operating Procedure Manual regarding refunds should be considered before local policy is established to minimize customer confusion."	SWD	Non-concur-Every OM does not need to have their own refund policy

Field Responses to the First Draft of ER 1130-2-550, Chapter 9 Update - February 2002.

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-10.d. Refunds: The refund policy needs to be more tightly controlled. The current wording "refunds may be authorized for legitimate reasons at the Operations Manager's discretion" is extremely vague and will establish inconsistent refund policies from project to project throughout the Corps. We should keep our existing policy that allows refunds to be authorized only in cases of an emergency. As O&M funding continues to be flat, we need to ensure our policies help not hurt our ability to maximize and leverage scarce resources. Our current policy is appropriate and consistent with similar service providers.	SAD	"Emergency" was deleted when NRRS began. NRRS and non-NRRS parks should be treated the same.
	paragraph 9-10-d. (2): Is there any way our lake projects could issue refunds directly to the customer in the form of VISA Checks? This would eliminate the huge administrative effort and cost currently associated with refunds. We are spending hundreds of dollars in order to provide a refund of \$20. Our current process for issuing refunds does not make good business sense.	SAD	Money would come from wrong account if VISA check was used, processing cost for VISA checks also. Also fee money belongs to treasury until appropriated back to Corps
	9-10 Accounting, paragraph e, Credit Vouchers, (page 9-9). Recommend second sentence read, "Credit vouchers are for NRRS." Recommend adding the following change to the last sentence "used/ issued in accordance with NRRS Operating Procedure Manual."	SWD	Non-concur-credit vouchers are history for the NRRS but will remain an option for non-NRRS parks.
	9-10.e. - The trademark "TM" has been left off of NRRS.	SPD	Concur-changed
	Paragraph 9-10.e - The draft indicates that credit vouchers are not given for fees collected through the NRRS. The NRRS Operating Procedures Manual includes directions on how to secure a credit voucher for reservations made through the NRRS. This appears to be a contradiction in policy. It is also noted that Paragraph 9-10.e. references paragraph 9-9f. of the EP, which should be paragraph 9-9.e.	LRD	Non-concur-Credit vouchers are history in NRRS
	paragraph 9-10-e. Credit Vouchers: Credit vouchers should be totally eliminated from our program. These are being eliminated from the NRRS. Why not just issue a free camping pass as described in EP 1130-2-550, page 9-3, paragraph 9-3, f. (3). Also, this ER needs to have a brief paragraph added that describes the "free camping pass program.)	SAD	Difference in cost(credit voucher for defined amount of money), free camping pass might not be of equal value.
	9-10.e discusses credit vouchers. Is the NRRS still issuing credit vouchers? Bev is under the impression we had quit using them.	NWD	Credit vouchers are history in NRRS
9-11. Security Measures	9-11. Security Measures, (page 9-9). Unable to find this reference, "AR 37-103."	SWD	AR-37-2-10 Chapter 4

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
9-1. Purpose	No comments received on this paragraph.		
9-2. Goals	No comments received on this paragraph.		
9-3. Policy	EP 9-3.a. - Why is the fee recommendation required every year when the recommendation is for two years? Also, fee recommendations should be required earlier due to NRRS requirements of fee schedule.	SPD	Non-concur-required by policy
	9-3a "The District Commander will provide the proposed schedule of use fees for the next two years to the Major Support Command Commander no later than Sept. 1 each year." Two years is too early. Local parks often don't change fees until January 1 each year, if that early. How can we assure comparable fees for comparable facilities and services when we set fees 2 years in advance? We recognize that we are already required to set fees early to meet NRRS inventory deadlines, but two years is too early.	NWD	Non-concur-required by policy
	paragraph 9-3.a. This paragraph requires MSC approval/disapproval of the districts proposed fee schedules. This authority should be delegated to District Commanders. The MSC's role should be to establish a procedure for periodic review/audit of the districts' processes used to establish and approve fee schedules. Also, the term "summer months" should be changed to "peak recreation season".	SAD	Non-concur-required by policy
	9-3b. How can we assure that we are comparable if we set fees two years in advance?	NWD	You submit fees every year so you can adjust them
	Paragraph 9-3.c: First sentence is confusing and not clear. Suggest replacing the sentence with "Corps districts in states with more than one district should coordinate fees."	NWD	Non-concur language is clear
	Paragraph 9-3.c: What does retention of the data for 2 years have to do with an accurate comparison? The comparison is a process and the data collection is a first step. The comparison itself is the result and justification of that process. We don't keep draft letters to members of Congress; we only retain the final letter. If there is a logical reason for this retention it should be explained. If this requirement is just there because it was a requirement in the last version it should be dropped.	NWD	Keep for 2 years to answer congressional inquiries, provide a record that can be tracked
	Paragraph 9-3.c(1 through 11): Suggest placing list in a priority order, so the priority is clear to those who will use this list for setting fees.	NWD	Non-concur-all equal priority and some may not apply or be available
	paragraph 9-3.c.(11). The reference should read "Chapter 9, paragraph 9-2 of ER 1130-2-550." There is no paragraph 9-2.a.	SAD	Concur-changed
	9-3d. There should be a standard in place for fees to be terminated if revenues are marginal. If it's basically a wash or if it doesn't solve a management problem, then it's not cost-effective or wise to spend our manpower collecting fees.	NWD	
	paragraph 9-3.e. - Exceptions: The decision to include an area in the fee program where the costs to collect fees exceed the revenue should not require MSC Command approval. The approval level should be at the District	SAD	Non-concur-MSC's retain fee approval per HQ
	9-3 f. We like the idea of free Camping Passes as a marketing tool. We recommend expanding the idea to include Annual Passes, as well.	SWD	Non-concur-not marketing

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	The word "Fee" should be capitalized in what currently reads "U.S. fee Area" in Paragraph 9-3.f.(2) of the EP on page 9-3.	LRD	
	Paragraph 9-3.f(3): On what basis are the free camping passes issued? Suggest giving some examples. To whom are they given – how do we avoid the appearance of rewarding our friends? How many is a "limited number"?	NWD	Concur-examples given OM decision on limited number given
	9-3 General Fees, paragraph f (3) (page 9-3). How do we procure camping passes?	SWD	District office
	9-3.f.(3) – This could potentially cause problems with parks that are under the NRRS system. Recommend that either the option be removed or some type of wording be added to exclude campgrounds with NRRS.	SPD	EP states they cannot be used on reservable site
	<p>Paragraph 9-3 General Fees, f. Public Relations, (3) - "A limited number of free Camping Passes may be issued for the purposes of marketing recreation opportunities to potential users. To reduce confusion, these coupons should not be referred to as "vouchers". Each coupon will be valid for no more than a year from the date of issuance. A camping coupon may be used only within the issuing District. The issuing project must keep a record of each coupon issued, including the date, value, recipient, and reason for issuance. Incoming coupons must be retained by the receiving project for end-of-season evaluation. The program should be evaluated for effectiveness on an annual basis. Each District may produce and distribute a camping coupon for their projects' use. Each coupon will be numbered, and the Operations Manager will authorize the number of camping coupons issued per season in accordance with the District's established schedule of use fees. The Operations Manager will authorize each camping coupon issued. "</p> <p>HQUSACE should define "potential users." and provide guidance on who qualifies as "potential user" This could be interpreted as permits for Volunteer Campground Hosts, Beach Hosts or other volunteers who are not paid for assisting the project but who offer significant services to the project. This free camping coupon appears to be an advertising gimmick to draw new customers to our campgrounds.</p> <p>How will the Free Camping Coupons be incorporated into the NRRS system? This will present the same problems encountered with the AUPS vouchers and the NRRS?</p> <p>The free coupon system will require a considerable amount of tracking by the primary fee cashier. Has this been studied to identify it as a cost effective technique?</p> <p>If we are going to use this coupon idea, it should be delegated to the Resource Manager at the project level</p>	LRD	Coupons are to be used as stated in the ER and EP. Tracking Comment: disagree, should not be a considerable amount of tracking. Is delegated to the OM.
	Paragraph 9-3 f.(3) - The draft contains provisions for issuing free camping passeses. Free camping passes could also be an effective public relations factor in instances when an error occurs with an NRRS reservation. Also recommend adding some discussion of how this will interface with NRRS call centers if reservable sites are offered through the coupon program.	LRD	Cannot use through NRRS call center or for reservable sites.

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	<p>9-3f3. "A limited number of free Camping Passes may be used for the purpose of marketing recreation opportunities to potential users." Why should we give free camping for marketing purposes when people are willing to pay for sites? When did we enter the business of marketing federal recreation sites? What are the guidelines set for this? This has potential for abuse.</p> <p>How does this work with NRRS? Can sites be reserved with these coupons? Or is this only for first come-first serve sites? How will we be able to track this utilizing Park Office software? We need to enter users in the Park Office Software for their registration information and to show that a site has been rented. How will Park Office Software process this form of payment?</p>	NWD	Camping coupons are optional. We have been marketing our sites for many years. NRRS has been marketing federal recreation sites. Use on non-reservable sites only. Does not go through Park Office.
	<p>paragraph 9-3.f.(3). We need to be consistent with terminology used for "free camping passes" / "camping coupons". Let's call them one or the other, not both.</p>	SAD	Concur-changed all to camping coupons.
	<p>A limited number of free camping vouchers may be issued for the purpose of marketing recreation opportunities to potential customers. THIS IS A GOOD IMPROVEMENT.</p>	NWD	
	<p>EP Page 9-3, should state the Free Camp Passes are not available nor redeemable in NRRS operated areas.</p>	MVD	Concur
	<p>Paragraph 9-3.g: The white copy is kept at the local office. Revenues collected are remitted to the USACE Finance Center via money order by fee cashier instead of the District Office</p>	NWD	Concur-changed
	<p>9-3 General Fees, paragraph g User Fee Permit (page 9-3). What about cash register? See paragraph 9-5 b (6).</p>	SWD	Included for day use fees
	<p>9-3 g. Why use District as the collection point for white copies of ENG Form 4457 and associated monies. Projects should transmit fees directly to F&A. The Financial Center in Millington has a SOP that prohibits us from sending them the white copy or other documentation such as AUPS printouts to them. Here is a link to Millington's SOP http://www.fc.usace.army.mil/adobe/pub/ufc_03.pdf</p>	SWD	Concur- white copies of 4457's will be kept at project office for at lease one year.
	<p>Pg. 9-3 Paragraph G of the EP states that when utilizing Eng 4457's for fee collection the white copy along with collected revenues will be submitted to the District Office. The money currently goes to the Finance Center and the white copies are kept in the Project files.</p>	NWD	Concur
	<p>Paragraph 9-3.g. – Neither copies of ENG Form 4457 (User Permit) or collected fees are sent to the District Office. Within some of the LRD districts funds are sent directly to NRRS in Atlanta, and white copies are retained at the field level for audit purposes. Should refer to standard operating procedures concerning the disposition of collections and documentation issued by the UFC in Millington, Tennessee.</p>	LRD	Concur
	<p>Paragraph 9-3. General Fees, g. Use Fee Permit. "ENG Form 4457 (User Permit) will be used as a permit and the official record for receipt of fees... The Automated User Permit System (AUPS) and the National Recreation Reservation System (NRRS™) may also be used to collect fees and issue permits."</p> <p>Since self-registration envelopes are also used for camping and day use fee collection, the corresponding ENG Forms 4839B, 4839 and 4839A should also be mentioned in the last paragraph with AUPS and NRRS.</p>	LRD	Concur-changed

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-3.g. Should indicate that the cardboard copy will be issued to the user; and the white copy may be forwarded to the District Office or kept at the Project with the yellow copy for at least two years. In many cases the project is the office of record. Also, we suggest that these items should be kept a minimum of two years. This would be consistent with AR 25-400-2 and MARKS guidance. This discrepancy needs to be resolved.	SAD	White copy will be kept at the project office for at least one year.
	Paragraph G of the EP states that when utilizing Eng 4457's for fee collection the white copy along with collected revenues will be submitted to the District Office. The money currently goes to the Finance Center and the white copies are kept in the Project files.	NWD	Concur
9-4. General Fee	9-4. Campground Use Fees. b. Payment. A maximum of 14 days in use fee charges... Suggest adding: To match Title 36 CFR 327.7(b), "A maximum of 14 days [during any 30-consecutive-day period] in use fee charges.."	NWD	Non-concur-this is not Title 36.
	paragraph 9-4.b. - Payment: Are "bankcards" and "credit cards" being used interchangeably here? There is a difference between bankcards and credit cards. Please clarify and use the correct terminology.	SAD	Concur- clarified and expanded.
	9-4 c (1). The second sentence, change the word "routine" to "periodic or general", or just delete it altogether. There is no such thing as "routine patrol" for the rangers.	SWD	Non-concur
	Paragraph 9-4.c.(2) The requirement for bonding for volunteer fee collectors effectively precludes the use of volunteers.	LRD	Non-concur-government can pay for volunteer fee collector bond. See volunteer reg.
	Paragraph 9-4.c.(4)(d) – "Revenues will be collected from the deposit vault on a regular basis. While in the area, personnel will check to insure occupied campsites have appropriate permits displayed and correct fees have been deposited". Change second sentence to read, "If possible, personnel should check to insure occupied campsites have appropriate permits displayed and correct fees have been deposited." We can't do this in the field in LRP. The vaults are collected and counted back at the office, so it is impossible to open the vault, find the correct envelope for the sites, and verify payment. The vaults are usually opened and the money counted after the camper has gone.	LRD	Concur-changed
	9-4.c.(5) - The trademark "TM" has been left off of NRRS.	SPD	Concur-changed
9-5 Camping Fee	Paragraph 9-5 - Typo error, change paragraph 9-5 to 9-6.	LRD	Non-concur
	9-5 Check paragraph numbering	NWD	Numbering ok
	paragraph 9-5.a. - Criteria: The correct reference is "Chapter 9, paragraph 9-6.a of ER 1130-2-550.	SAD	Concur
	Paragraph 9-5.b.(1)(b) – Current policy for NRRS is that day use fees may only be collected through NRRS at those day-use areas which are part of a larger recreation area which contains a camping area which is included under the NRRS.	LRD	Concur-changed
	paragraph 9-5.b.(2)(b): When charging a fee for boat launching only (per facility fee), it is more effective to locate the self-deposit vault at the boat-launching ramp, rather than at the entrance to the area.	SAD	Concur-we will not specify where to place the vault

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-5.b.(2)(d): The only way to truly confirm payment of the day use fee in a self deposit vault is to open the vault and the cash box, find and open the appropriate envelopes for each vehicle, and determine if the fee was actually paid. Personnel collecting from vaults where the cash box and the vault lid are keyed differently do not have the key to the cash box, and it is not advisable to open the cash box in the field.	SAD	Concur
	9-5 Paragraph (d) (3): "The use of automated fee collection systems is encouraged when cost effective." May need to explain what this is? Is this an entry type of mechanism that has an arm or barrier that goes up when money is put in??? Similar to an "entry barricade used at parking lots"? Surely not, since we do not have "Entry Fees" but was just wondering.	NWD	Not specified-keeping options open
	9-5. Day Use Fees. b. Methods of Collection. (4) Annual passes may be sold through the mail, if payment is received in advance. Annual passes may be sold through the mail with a Golden Age/Golden Access Passport discount if the applicant furnishes a photocopy of their Golden Age/Access Passport. Personalized check is the only authorized method of payment for Annual Passes purchased by mail. Comment: This is a major change from past practice, which requires the passport holder to be physically present at the use of the passport. This will allow some fraud...	NWD	Covered in ER comments
	9-5 Day Use Fees, paragraph b (4) (page 9-6). This paragraph describes a procedure in which Annual Day Use Fee pass may be purchased through the mail. We understand this would provide a better customer service, but we question this service. If this policy is adopted, a specific procedure will need to be adopted Corps wide to insure the accountability is maintained throughout purchase process. For example, does the purchaser call before hand to find out how to buy the pass through the mail? Does he leave the "Pay to" line blank for us to apply our stamp "F&A Officer, USAED, Fort Worth?"	SWD	Purchase ADUP through the mail-has been done through the mail for many years and is not a problem.
	Paragraph 9-6.a.(4) (c) (3) and Paragraph 9-5.b.(4) of the EP - Verbiage indicates that personal checks will be the only method of payment for Annual Passes purchased by mail. Suggest that money orders and credit cards be included as methods of payment. Credit card information could be taken over the phone, or a copy of the card could be faxed or emailed (scanned attachment) to the project. We should also utilize all electronic means available to serve the customer. With approval to accept credit cards, recommend replacing the 2nd sentence of EP Paragraph 9-5.b.(4) with, "Annual passes may be sold by fax, phone, mail, or email with a Golden Age/Golden Passport discount if a copy of the individual's Golden Age/Golden Passport accompanies their application via email (scanned attachment), faxed, or mailed photocopy.	LRD	Concur
	Paragraph 9-5.b.(4) – Requiring photocopy of Golden Passport would not be sufficient to discourage fraud. Golden Pass discounts should not apply to annual passes purchased by mail.	LRD	Yes it would, very doable.
	9-5(d)4 For mail-in request, can a certified checks or money orders be used to purchase a Golden Age Golden Access discounted annual day use pass?	NWD	Yes
	paragraph 9-5.c.(4): This paragraph indicates that personalized checks are the only authorized method of payment for Annual Passes purchased by mail. Why not money orders and cashiers checks?	SAD	Concur-changed

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	9-6 c (4) see if they will add payment through the mail with credit card for annual passes. Why can't we accept credit card numbers for annual passes sold by mail? Policy states only personal checks will be accepted.	MVD	Yes, as long as office can process.
	(5) Annual passes may also be purchased over the telephone with currently accepted bankcards. Passes may not be sold with a Golden Age/Access Passport discount over the telephone. Comment: If the photocopy method is used in (4) above, the use of a faxed copy followed by credit card would logically follow...	NWD	Concur
	paragraph 9-5.c.(5): The term "bankcard" is used here. Do we mean credit card?	SAD	phone=yes, credit card
	9-5 Day Use Fee, paragraph b (6) (page 9-6). Could not find this reference.	SWD	
	paragraph 9-5.c.(6): The correct reference is Chapter 9, paragraph 9-6.a.c.(2) of ER 1130-2-550.	SAD	
9-6 Day Use Fee	9-6.a. - The trademark "TM" has been left off of NRRS.	SPD	changed
	paragraph 9-6.a. - General: In the first line insert the word "permit" between the words "activity" and "fees". Also, why are group camp area fees listed under special use fees? This is a camping fee, not a special use fee.	SAD	
	9-6 Special Use Fees, paragraph c (2), (page 9-7). There is no need to single out the NRRS for remitting fees.	SWD	It's not singled out, also mention in person, by mail
	Paragraph 9-6.c. – This needs to be checked; not aware of how these fees can be collected through NRRS unless the event is occurring at an NRRS area.	LRD	Concur-change to NRRS area
	Paragraph 9-6.c. Special Event Permit Fee. A major portion of the special events we have at some lake facilities are small fishing tournaments. The staff generally spends very little time associated with these tournaments. Are we going to be required to charge a fee for every special event? We think the requirement to charge a fee should be based on the amount of staff time generally spent. The staff time spent on most of these events -- small tournaments -- will be doubled if we charge a fee. It doesn't make sense to charge in all instances.	LRD	You do not have to issue a SEP for all events. If staff spends very little time on the small tournaments, why not stop issuing SEP for them.
	paragraph 9-6.c. - Special Event Permit Fee: This paragraph references Appendix N. However there was no appendix N with the draft regulation.	SAD	Concur-appendix is coming
	9-6. Special Use Fees. d. Special Activity Permit Fee. In some cases, it has been determined necessary to issue Special Activity Permits for recreational activities on Corps land. These permits may serve to promote environmental, safety, or security concerns; restrict numbers of visitors to an area; place restrictions on the recreational use activity; or provide information to the user concerning their activity. Examples of the types of recreational activities where the Special Activity Permit program may be appropriate include hunting and off road vehicle use. A fee may be collected to capture the administrative cost of these programs. Comment: Is hunting a special activity???	NWD	It could be if there is a management issue being addressed.
	9-6 d. We agree with the establishing Special Activity Fee, in addition to Special Event Fee.	SWD	
	paragraph 9-6.d.(1): Division level approval should not be required. The District Commander should have approval authority. The Division should be notified of the fee schedule approved by the District Commander.	SAD	Non-concur

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-6.d.(2): Change the term "special use permit" to " special activity permit". Also, Amend the last sentence to: "Examples of this include limiting hunting on an area to a shorter season than state seasons, setting specific bag limits below state levels, and restricting allowable weapons, ammunition and harvestable species of game."	SAD	Concur
9-7 Other Equipment, Facilities, and Services	For consistency, the paragraph number currently reading "9.7" should be "9-7" on page 9-7 of the EP.	LRD	Concur
	9-7 The flexibility to charge for other equipment, facilities, and services will facilitate innovation in providing those services. To be consistent, Para 9-7 should be written as "9-7".	SWD	Concur
	paragraph 9-7 – Other Equipment, Facilities, and Services: Approval of a fee schedule for these fees is not indicated. The District Commander should have authority to approve this fee schedule.	SAD	Non-concur- MSC will approve
	Chapter 9-7 Other Equipment, Facilities, and Services Page 9-7: Examples include firewood, ice, laundry, machine use, shower use, parking, and recreation equipment rental, such as rent-a-tent.....might want to add "dump station usage" for another example of other facilities, etc.	MVD	Concur
	Paragraph 9.7(b) Other Equipment, Facilities and Services - "Parking fees in campgrounds may be charged for user's vehicles in excess to the number permitted on the campsite. No additional parking fees may be charged for user vehicles parked on the campsite in accordance with the designated vehicle carrying capacity. Designated, improved parking spaces must be provided elsewhere in the part to charge separate fees." Wording in the last sentence. Might we mean park?	LRD	typo changed
	9-7b. Again, where the car parks should be up to the manager. Charging for all vehicles (with the exception of ones towed by the main camping unit) above the main camping unit is consistent with other agencies. See comments for ER 1130-2-550 9-8b.	NWD	Non-concur-must park in designated parking lot if site capacity is exceeded.
	9-7 b. Recommend that regulation provide authority for additional fee charges when visitors bring extra vehicles beyond the sites carrying capacity, regardless of whether or not additional parking is available. Extra vehicles mean additional visitor assistance, moving vehicles out of roadways, erosion, and soil compaction efforts, etc. In para. 9-7 b, last sentence, change the word "part" to "park".	SWD	Must have improved parking lot available(not just a field)to justify charging.
	EP paragraph 9.7.b. states that no additional parking fees may be charged for user vehicles parked on the campsite in accordance with the designated vehicle carrying capacity. Additional vehicle charges are a well established practice in the Pacific Northwest and are used at our campgrounds as a management tool. We would like to have the discretionary authority on this issue. EP Page 9-8, First line, typo. Change "part" to "park".	NWD	HQ policy
9-8 Discounts	9-8 Discounts, paragraph a, Applicability, (page 9-8). Recommend the following wording be added to first sentence, "including camping fees, day use fees, visitor to register camper fees, special facility use fees, and other equipment facility, and service use fees."	SWD	too wordy, says established use fees
	9-8 Discounts, paragraph a, Applicability, (page 9-8). Recommend the last sentence of paragraph be rewritten, "The reduction does not apply to special event permit fees and group use fees unless all members of a group have such a passport."	SWD	Covered elsewhere in regulation

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	<p>The following two paragraphs from the ER/EP are in conflict with each other. The conflicting portions of the statements are in Bold Italics:</p> <p>EP 1130-2-550 Chapter 9, Paragraph 9-8, Discounts - a. Applicability. "Golden Age or Golden Access Passport shall entitle the permittee and any person accompanying him/her in a single, private, non-commercial vehicle (or alternately, the permittee and his/her spouse, children, and parents where entry to the area is by any means other than a private, non-commercial vehicle) to 50 percent reduction of established use fees. This 50 percent reduction is also applicable to use fees assessed visitors of registered campers. The reduction does not apply to group use fees unless all members of a group have such passports."</p> <p>AND</p> <p>ER 1130-2-550 Chapter9, RECREATION USE FEES, paragraph 9-9, Discounts a. (3) – "A Golden Age or Golden Access Passport shall entitle the permittee and any person accompanying him/her in a single, private, non-commercial vehicle (or alternately, the permittee and his/her spouse, children, and parents where entry to the area is by any means other than a private, non-commercial vehicle) to a rate of 50 percent of the established use fees such as fees for swimming, boat launching, camping, and other equipment, facilities and services as described in paragraph 9-8 above. This 50 percent reduction is also applicable to use fees assessed passport holders who are visitors of registered campers. The reduction does not apply to group use fees unless all members of a group have such passports. Golden Age Passport or Golden Access discounts do not apply to Special Event, Special Activity or Special Facility Permit fees. The reduction does not apply to fees charged by leaseholders or concessionaires."</p> <p>The EP statement should be revised to read, "This 50 percent reduction is also applicable to use fees assessed passport holders who are visitors of registered campers." The wording referred to in the EP does not clarify that passport holders who are visitors of registered campers are the ones receiving the discount. The present EP wording is interpreted to include all visitors, even those without Golden Age / Golden Access Passport who visit a registered camper. We do not believe that this was the intent of this statement.</p>	LRD	Concur- Visitors to campers must have GA/GAP to receive the discount.
	<p>paragraph 9-8.a. – Applicability: This portion of the paragraph that indicates, "the 50 percent reduction is also applicable to use fees assessed visitors of registered campers", needs to be clarified. Some have misinterpreted this section and have allowed Golden Age/Access campers to use their discount to pay visitor fees for their visitors (who do not come initially with the Golden Age/Access card holder and who are not eligible for a Golden Age/Access discount). The visitor to campground fee is a totally separate fee and Golden Age discounts only apply when the visitor to the campground is a Golden Age/Access cardholder. Also, in some states, farm vehicles have a "COMMERCIAL" delineation on the license tag. Is clarification needed?</p>	SAD	Concur
	<p>Paragraph 9-8 b. - Appendix P not included. All appendices should have been included before review.</p>	LRD	App P(waiver) not changed so it wasn't sent.

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	paragraph 9-8.b.- Documentation: Appendix P is referenced, however there was no appendix P included with the draft regulation.	SAD	see above
	paragraph 9-8.b. – Documentation: Army Regulation (AR 25-400-2) and MARKS guidance require records to be maintained for 3 years before being discarded. Need to be consistent with other guidance.	SAD	Concur-keep records one year
	ER Page 9-8 & EP Page 9-8, Documentation of GAP's and GAC's issued. Both state that ENG Form 4840 will be filled out for each issued. This is in addition to recording them on ENG Form 4468-R. I hope what they meant to say is that the 4840 will be filled out if the person doesn't have proper documentation. If they actually said what they meant, it's ridiculous. Further, I don't think we should use the form for issuing Access cards. They should be able to provide proof of disability in order to receive a lifetime of discount.	MVD	Concur-changed in EP and ER. In DOI regulation.
	Paragraph 9-8.c.(1) – Somehow we need to emphasize that only U.S. citizens are eligible to receive the Golden Age Passport or the discount. (We have encountered Canadians who own property in the U.S. and argue that they are eligible. We have also encountered Canadians who have been issued a passport by other agencies or districts. We do not issue a passport or allow the deduction in either case).	LRD	Non-concur-required by law
	9-8 c. Include a statement to the effect that Golden Access passports are issued only to those who appear in person. Golden Access Apassports should not be issued to any person who is too infirm to appear in person. The reasoning being that if a person is not capable of appearing in person to acquire the Golden Age Passport, they will be unable to appear in any of our parks.	SWD	Concur-made changes in ER and EP
	We still have concerns about anyone signing a waiver to receive a Golden Access Passport. We feel the potential for misuse of the card is at a high rate.	SWD	Understood-but required.
	I am still concerned that all anyone needs to do is sign a waiver for the Golden Access card. The intent of the card is being misused at a high rate. Permanent Physical, mental, impaired that substantially limits one or more major life activities, etc. working. I have witnessed individuals who receive the card who are actively working for a living. I realize the definition seems to have changed somewhat since I first started with the Corps.	SWD	see above
	Paragraph 9-8.c. – Should include clarification/guidance on issuance of Golden Access Passports to disabled children (for example, we have had requests for issuance of the card to each of several handicapped foster children within the same family). Some districts within this division have assumed that "acceptable documentation" means that there is no requirement to ask for proof of disability (for all Golden Access Passports). There is a need for clarification.	LRD	Children 12 and under are not subject to use fees.
	Last but not least! 9-8 Discounts (C) Eligibility Requirements,(EP): We sure do have a lot of unneeded ways to get a Golden Access Passport. My suggestion is to eliminate the last method, (e) which utilizes the signed Statement of Eligibility, since it requires no proof whatsoever of a disability. If we are unable to remove this option then we might as well remove all the other remaining methods, (a) thru (d), since they are redundant and much more difficult to obtain.	NWD	Non-concur Fed land mgt agencies all do this

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	<p>9-5. Discounts c. Eligibility Requirements. (2) Individuals eligible to receive the Golden Access Passport... Suggest adding: That like Golden Age passport applicants, Golden Access Passport Applicants must appear in person to obtain their passports.</p>	NWD	Concur-changed
	Paragraph 9-8.c.(2)(a) – Should include a list of Federal agencies/programs that provide such benefits.	LRD	refer to Federal recreation pass program brochure
	(b) Special Facility Use All in group would be required to have Golden Age/Access Passport.	NWD	Concur-that's what it says
	Paragraph 9-8 b. c (2) (e) - Golden Access Pass Ports. Suggest that we require individuals to present appropriate documentation on obtaining these free life time discount cards and not issue on signature only. This will make it fair to all card holders and will prevent those who are not eligible from falsely signing the form.	LRD	agreed but required
	EP 1130-2-550, Chapter 9, Paragraph 9-8.c.(2)(e) – Should be deleted. This invites abuse of the program. Proof of eligibility should be required before issuance of the Golden Access Passport.	LRD	see above
	This provision opens the door for serious abuse of the Golden Access discount.	SWD	see above
	Paragraph 9-8 Discounts c. Eligibility Requirements (2) (e) – “If the individual does not have any of the above documentation in his/her possession, he/she may attest to their eligibility by signing the Statement of Eligibility.”	LRD	see above
	<p>Para. 9-8,c, (2) states that “Individuals eligible to receive the Golden Access Passport shall be any person who has a permanent physical, mental or sensory impairment that substantially limits one or more major life activities, such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning or working. Acceptable documentation for issuance of the passport will be any of the following:” and goes on to list five forms of documentation that are acceptable.</p> <p>The EP indicates that four forms of documentation issued by the Federal or state governments or national or state organizations can be used to verify eligibility for obtaining a Golden Access Passport. One can obtain a free Access card by presenting documentation issued by a Federal agency, a signed doctor’s statement, a state government identification card or an identification card issued by a national or state organization of, by or for disabled persons, all stating that the individual is permanently disabled.</p> <p>The fifth form of documentation listed in the Corps EP is the Statement of Eligibility signed by the individual attesting to eligibility for a Golden Access Passport if he/she does not have documentation in his/her possession. By signing this Statement of Eligibility the individual circumvents the other four forms of “official’ documentation. And this is what causes a concern: an individual just signing the Statement and NEVER having to show any of the other four forms of ‘official’ documentation, not even after the fact, at a later date.</p>	LRD	RE:1995 Federal Recreation Passport Program- superceded by new brochure-Fed Rec Pass Program. Waiver remains an option even though no one likes it, the law requires it.

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	<p>A review of the 1995 Federal Recreation Passport Program brochure states that a Golden Access Passport "is available only to citizens and permanent residents of the United States, regardless of age, who have been medically determined to be blind or permanently disabled." An individual "may obtain a Golden Access Passport by showing proof of medically determined blindness or permanent disability and eligibility for receiving benefits under Federal law" This procedure is spelled out in a clear and concise manner and never mentions the option of signing a Statement of Eligibility as stated in the EP paragraph referenced above.</p> <p>This fifth form of documentation should be deleted since the other four forms of documentation are 'official' and attest to the individual's disability. IF the 'Statement of Eligibility' option is not removed as suggested, then there has to be a requirement to provide the 'official' documentation at a later date. At the time when the individual shows up without his/her documentation, for whatever reason, and for the fact that they may have been unaware of the documentation issue, the Golden Access Passport discount could be issued and logged in as 'issued' on a temporary basis. The Statement of Eligibility would be used for this first time, with the Passport not actually given to the individual until he/she returns at a later time with the proper documentation. The Statement of Eligibility would be filed as temporary documentation. Thus the Statement of eligibility would be a temporary document. This procedure would accommodate "locals" who could return by a later specified date with proper documentation. Anyone from out of the area would be made aware at this time of the documentation requirements and thus make arrangements to procure the</p> <p>proper documents and have them with them the next time. This procedure would be outlined in a policy letter issued after the ER/EP is issued final.</p> <p>As long as this last statement (e) continues the present policy and practice, the Golden Access Passport program will continue to be a "give away" program, with constant opportunities for fraudulent use.</p> <p>Recommend that 9-8 Discounts c: Eligibility Requirements (2) (e) be revised to read as follows: "If the individual does not have any of the above documentation in his/her possession, he/she may attest to their eligibility by signing the Statement of Eligibility. Those individuals signing the Statement of Eligibility will be given a specified amount of time to return and provide the required documentation before being issued the Golden Access Passport."</p> <p>Anyone from out of the area would be made aware at this time of the documentation requirements and thus make arrangements to procure the proper documents to acquire a Golden Access Passport.</p>		
	<p>paragraph 9-8. c.(2)(e): A specific "Statement of Eligibility" form with wording approved by the Office of Council, should be developed and included as part of the regulation. Also, this is one of the most abused areas of our fee program. We need tighter restrictions on issuance of Golden Access Passports. The public soon discovers that all they have to do to get a Golden Access Card is to fill out a Statement of Eligibility form, and they will be able to get a passport without any other documented proof of disability. We need to require documented proof of disability and eliminate the option of allowing the public to attest to their eligibility by just signing the Statement of Eligibility form.</p>	<p>SAD</p>	<p>agreed but required</p>

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	The EP references Appendix P as a privacy act statement that must be provided to passport purchasers. Appendix P is noted as being included but I'm not able to locate it.	NWD	App P not changed so wasn't included
9-9. Accounting	9-9 Check paragraph numbering	NWD	
	Paragraph 9-9.b: The requirement for an annual analysis is overkill and adds an unnecessary and untenable administrative burden on lakes and districts. Suggest this requirement be eliminated or if necessary included only as a suggested analysis when public use patterns indicate conditional changes are occurring at particular recreation sites.	NWD	Non-concur required
	9-9 Accounting, paragraph b, (page 9-9). What is the "one-hour rule."	SWD	Concur-eliminated one hour rule
	Paragraph 9-9b. - The "one-hour" rule needs to be defined.	LRD	Concur-eliminated one hour rule
	9-9 b. What value does this analysis provide? What is going to be the cost associated with keeping up with all these costs, indirect and direct, associated with fee collection? In other words, who is going to be analyzing the costs associated with collecting information about costs? If we must find out how much it costs to administer a fee collection program, establish some test sites and extrapolate the results Corps wide. We strongly disagreed with providing additional analysis. Effort would be more appropriately expended in the analysis of what the NRRS is costing for the collection of fees.	SWD	Non-concur-analysis must be done-this is a long standing requirement, not new
	Paragraph 9-9b. - m. Paragraph 9-9 b. of EP. Administration Costs. There is general consensus within this Division that the tracking of these costs will require a lot of time and effort by project personnel who are currently doing the best they can just to try to keep up with increasing demands of the fee program. Requirements of the day use fee program and NRRS have heavily burdened available man power resources. Although there is some merit in collecting these figures, we simply do not have the time to do so. Further more, just having the data does not make it easy to make adjustments to the program as many other factors are involved. With new legislation being considered to include the Corps in the Fee Demonstration Program, we need to be very careful about dropping an area from the fee program and then adding later because of new authority. Strongly suggest making this cost analysis an optional or to be done on an "as needed" basis.	LRD	Cost of collection is only one small part of the cost of running a park-this is not effective tool if we are running a business function. What about depreciation mowing, maintenance, utilities.
	paragraph 9-9.b. – Administration Costs: Recommend the development of a standard formula for calculating Administrative Costs	SAD	Non-concur-too much variance
	paragraph 9-9.c. – Revenue Reporting: Are all fees discussed in Chapter 9 of ER and EP, including permit fees, facility fees, special activity fees, equipment and service fees to be placed in this Special Receipt Account 96-145005.4 (96 x 5007) and are all these fees truly to be reported as recreation use fee revenues?	SAD	Yes
	Paragraph 9-9 d.(2) - There should be a standardized form for requests for refund in order to assure that all required information concerning the refund is obtained.	LRD	One available in NRRS.Added one App T

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	Paragraph 9-9.e. - There is unanimous belief within the LRD that the draft EP delineates cumbersome procedures for covering the costs of money orders or cashiers checks for the remittance of cash collections. Due to the administrative burden this places on fee collectors, some locations now refuse to accept cash. At other locations, fee collectors pay the cost of a money order out of their own funds to avoid the administrative burden of recouping the cost of a money order. The cost of converting cash collections to a money order or cashiers check is a legitimate cost of business, and deducting that cost from the cash collections would automatically charge the cost to the activity generating the cost. We strongly encourage a review of accounting procedures to simplify this process.	LRD	We have simplified and explained all options
	paragraph 9-9.e. – Credit Vouchers: Credit vouchers should be totally eliminated. In lieu of a credit voucher, a camping pass, as described earlier in this regulation, should be issued.	SAD	credit vouchers are still an option for non-NRRS parks
	9-9 e. The second number (2) should be (4) on page 9-10 and on page 9-11, the credit vouchers paragraph should be f. instead of e.	SWD	Concur-changed
	Paragraph 9-9 e. (2). - The requirement to replace funds each month requires an unreasonable amount of time and resources for the small amounts of monies being replaced. Suggest that something be worked out to would allow replacement to be done on an annual basis	LRD	If option 4 is used, Millington dictates it be this way- use one of the other 3 options
	9-9 page 9-11, (d) and (e) – spell out to clarify “ROV”	NWD	spelled out first itme it was used in (b)
	9-9 Accounting, paragraph e (4), Cost of Remittance, (page 9-10). Recommend adding the following statement, "Funds being remitted through the NRRS must be processed according to the current NRRS Operating Procedure Manual."	SWD	Non-concur-creates a "do loop"
	9-9 Accounting, paragraph f, Credit Vouchers, (page 9-11). Recommend adding the wording, “in accordance with or reference Chapter 9, paragraph 9-10 e, ER 1130-2-550.	SWD	concur
	An additional line should be inserted between items (1) and (2) of Paragraph 9-10 of the EP on page 9-11	LRD	Concur
	Paragraph 9-9 e, page 9-11 - Typographic error; change paragraph e. to f. Also, suggest adding that Credit vouchers are not used in the NRRS.	LRD	changed
	Paragraph 9-9.e. “Credit Vouchers. Vouchers will be issued in lieu of refunds whenever possible. No vouchers will be issued for day use fees.” For further clarification, add sentence from ER 9-10.e. which states "Credit vouchers are not given for fees collected through the NRRS."	LRD	concur-changed
	9-9.f is mislabeled as "e"	NWD	concur-changed
9-10. Security Measures	Paragraph 9-10.a.(7) - Ensure personnel collecting and storing funds work in pairs and have reliable communications equipment (radios or cellular phones) available at all times. Rewrite sentence "Where feasible, ensure personnel collecting and storing funds work in pairs and have reliable communications equipment (radios or cellular phones) available at all times This is not always possible or practical for smaller projects that are short staffed and who collect nominal amounts of cash. Staffing constraints and workload at some projects make it unlikely that people will work in pairs when day use fees are being collected and moved to storage.	LRD	changed- but to stay out of trouble work in pairs, use double keyed boxes, count money back at office with admin clerk or other.

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	Paragraph 9-10.c: If this is a firm requirement suggest the use of the word "shall" instead of "will". Suggest that Resource Management personnel also review funds security procedures to ensure compliance with funds security requirements. There should be a requirement for both security and resource management offices to be provided a copy of this regulation.	NWD	Out of OP's control-leave "will"
	Paragraph 9-10.e(2): Section beginning with "Projects may use" is incorrectly numbered – should be Paragraph 9-10.e(4).	NWD	concur
9-11. Controlling Paperwork Burden on the	No comments received on this paragraph.		
Appx. M	Appendix M: Question the need for Class E listing. Might work just as well to say if the area is not Class D fees do not need to be charged. The definition of a rock fire ring as a fireplace is questionable – they contain fires very poorly and tend to migrate around the campsite. Suggest elimination of the rock ring and include steel or masonry fire rings instead.	NWD	Non-concur
	Appendix M, Footnote 1: Change "should" to "may". Let the decision to charge fees at primitive sites be a local decision based upon local conditions.	NWD	concur-change made
	<p>"APPENDIX M – USE FEE CRITERIA- GROUP AND SINGLE USER UNIT CAMP AREAS - Class A Group Camp Areas. - Minimum \$50.00"</p> <p>The recommended group camping fees should be indicated as follows – "A Group Camp Area – *Minimum \$50 ". Note at bottom would read * " Recommended " - Resource Manager could implement lower fee, according to amenities present at the site".</p> <p>It is our experience that all Class A Group Camping Areas at all projects do not necessarily meet the exact standards as shown in Appendix M. This also applies to Class B, C, D & E group sites For a Class A campground, for example, each campground has different characteristics and amenities, which do not necessarily meet the strict standards of a Class A Group Camp Site, The fees for Class A, B, C, D & E group sites should all be "Recommended" fees, not required fees</p>	LRD	Concur-adding "group camp area" at bottom. These are the minimum requirements-park can have more than this
	There is guidance for establishing fee schedules for camping facilities, but none for establishing fee schedules for group picnic shelters. Such guidance would be helpful.	NWD	
	Appendix M. We would prefer to see a "recommended" minimum charge listed. We would like the flexibility to be able to have a lower fee during slow periods to encourage use.	NWD	Non-concur-see following comments
	Appendix M – Use Fee Criteria, Group and Single User Unit Camp Areas: The criteria need to be totally revised. There are not sufficient differences between the various classes of campgrounds to make the classification system meaningful. As examples: The only difference between a Class C and B area, is the existence of a sanitary disposal system. The only differences between a Class A and B area are vault or flush toilets and showers or no showers. These criteria should be reviewed and evaluated at a later date as a separate tasking not related to the update of this regulation	SAD	Concur-SWD task force(appointed by HQ)

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
Appx. O	<p>APPENDIX O - PROGRAM INTEGRITY: HONOR VAULTS – Paragraph O2.b(5) - Tracking Fee Payment Envelopes: "Honor systems envelopes should be subsequently number so they can be easily tracked for auditing purposes."</p> <p>There is no way the honor vault self-deposit envelopes can all be accounted for. If we have to account for all the day use envelopes, we certainly will not meet the following criteria in ER 9-6.a.(1) - "Day use fees will be charged where there is reasonable expectation that revenue will exceed costs of collection, to include implementation costs.....; and ER 9-2. Goals. - to recover a reasonable portion of the cost of administering, operating, maintaining and improving specialized recreation facilities, services". However, the very nature of the self-deposit program makes it impossible to ensure that campers access these envelopes in any kind of sequential fashion.</p> <p>Lake facility personnel would never be able to account for all numbered envelopes issued to them, since fee envelopes are placed in boxes that are accessible to the public. Anybody can just grab a handful, and do whatever they want to with them.</p> <p>At smaller recreation areas it is not always practical to have a contractor, or possible to obtain a volunteer, to issue individual self-deposit envelopes. Under such circumstances it is impossible to regulate the numeric order at which envelopes are removed from an envelope holder. If paragraph O-2.b(5) is not deleted, it is recommended that wording be added to allow the option of numbering permits if for some reason the Resource Manager chooses to number these permits for local issues/reasons. In LRP, all day use and camping self deposit permits are printed with numbers so that the Resource Manager always has the option to use the permit numbers to monitor the permit program. Change "should" to "may".</p>	LRD	Non-concur-centrally printed by GPO-will be numbered to verify payment.
	O-2.b. Change employees to persons as some projects utilize volunteers to assist in fee collection.	SPD	Concur-changed
	<p>"APPENDIX O - PROGRAM INTEGRITY, Paragraph O-2 b. Operational Controls: (5) Tracking Fee Payment Envelopes: - "Honor systems envelopes should be subsequently numbered so they can be easily tracked for auditing purposes".</p> <p>Should be or must be? Lost or stolen, rain soaked envelopes do get destroyed; the numbering sequence would be out of sequence for auditing purposes. Accountability for lost or stolen envelopes can never be tracked. This means more time spent stamping envelopes, more time to record numbers all of which add to the overall cost of operating the program.</p>	LRD	
	O-2b.5 Numbering fee payment envelopes with sequential numbers for the purpose of auditing are only partially effective. Customers taking multiple envelopes will affect the numbering system and damage the usefulness of the audit.	SWD	non-concur-numbering is to verify payment, not for tracking
	Appendix O: o-2.c: The paragraph states toward the end "... use the following methods, among ...". What following methods? This isn't clear.	NWD	concur-changed
	Paragraph O-2.c. of Appendix O appears to be incomplete. It says to "...usethe following methods..." But the methods are not included.	LRD	concur-changed
	Appendix O, paragraph O-2.c. This paragraph is not understandable. It needs to be rewritten.	SAD	concur-changed
	O-c. Are there supposed to be methods for auditing controls listed here?	SWD	concur-changed

Field Responses to the First Draft of EP 1130-2-550, Chapter 9 Update - February 2002

Paragraph	Field Comment	Division	Task Group Response
	<p>“APPENDIX O - PROGRAM INTEGRITY: HONOR VAULTS – Paragraph O2, c. - Auditing Controls: ER 37-2-10 calls for “constant review and examination by internal audit staffs” and provisions for “policing the effectiveness of the prescribed procedures by those responsible for managing government resources” use the following methods, among others, for verifying that envelopes and funds are turned in for deposit.</p> <p>No methods are indicated under auditing controls in the text of Appendix O</p>	LRD	concur-changed
	<p>“APPENDIX O - PROGRAM INTEGRITY, Paragraph O-2 - The following controls are suggested to strengthen the integrity of the honor vault fee collection program.</p> <p>Missing from this draft are regulations for changing honor vault locks annually.</p>	LRD	non-concur-addressed in ER 37-2-10 Chapter 4
Appx. Q	APPENDIX Q, Paragraph Q-1.b. - This paragraph should be revised to include the direct transmittal of fees to the Federal Reserve Bank.	LRD	Non-concur-We don't do this anymore
	APPENDIX Q, Paragraph Q-1.c. - Types of Bonds. This paragraph identifies "fidelity bonds" which as we understand it, pertain to employees, not volunteers. Currently we use "surety bonds" for our volunteers, which are the type specified in the current regulation. Suggest that this be checked out to make sure that there is not a misunderstanding.	LRD	Concur-changed
	APPENDIX Q, Paragraph Q-2 - The third sentence should read "...before transmission to the F& A Office or Federal Reserve Bank."	LRD	Non-concur-We don't do this anymore
	Appendix O and Q: Clarification is needed on how long documentation of use fee transmittals and related paperwork is to be kept on file.	SAD	Concur
Appx. R	<p>“APPENDIX R, MAINTAINING FUNDS SECURITY, Paragraph R-1. c – “Use fee permit books must always be issued in sequence and permits sold in sequence.”</p> <p>This is not possible if a project has two or more Alternate Fee Cashiers: permits from different books will be sold out of sequence. This regulation seems to be written for only one fee cashier. This can certainly be confusing for a primary fee cashier who has several alternate fee cashiers and collectors at the project. This section needs to be re-written to clarify the issuance of permit books to alternate fee cashiers and collectors by the primary fee cashier.</p>	LRD	Non-concur-do the best you can, issue permits in any one book in sequence.
	<p>d. Secure money and books in a permanently installed vault or safe provided by the government. Comment: This requires a safe for each Park Attendant.?!? An additional expense</p>	NWD	Concur-see ER 37-2-10 Chapter 4
	<p>“APPENDIX R, MAINTAINING FUNDS SECURITY, Paragraph R-1. e. Projects should appoint on-site auditors to check procedures used in collecting, handling, and transmitting fees. Do we really need another auditor involved with this program? We have the area ranger doing monthly audits, the District Fee Coordinator reviewing remittances and doing fee verifications and Internal Review completing yearly audits. Another auditor will only add an additional workload of duties to our already limited project staffing. This will also only increase the cost of collection by the project for the entire fee program.</p>	LRD	Non-concur-it's the right thing to do, only received one comment

Field Responses to ER 1130-2-550, Chapter 9 and EP 1130-2-550 Chapter 9

First Draft Update - February 2002

General Comments

Field Comment	Division	Task Group Response
General Comment: Both the draft ER and EP are confusing and somewhat disorganized. It is suggested that an entire new draft be provided for comment prior to release of the signed version. Several reviews noted a lot of unnecessary redundancy between the ER and the EP.	NWD	Concur-changed
General Comment: Suggest use of "Natural Resources Manager" instead or in addition to "Operations Manager" in all uses throughout document.	NWD	Non-concur
Paragraph numbering is confusing, and there are several errors.	SWD	Concur-changed
Fee collection methods are confusing in references 9-3 (g), 9-4 (5), 9-5 (b) and (6), 9-6 (a), and collection methods for "Other equipment" in 9-7 is not given.	SWD	Concur-changed
Duplicated language given in ER and the EP, some seems contradictory. The ER is probably too detailed and the majority of this specified detailed guidance should be located in the EP. Specific guidance is given in both documents and requires the reader to obtain guidance from two sources to get the consolidated guidance.	SWD	Concur-changed
SRUF - These funds should be treated as they were intended: monies returned to the project ABOVE AND BEYOND appropriated funds, dedicated to betterments and improvements of recreation facilities. Otherwise, don't bother.	NWD	
Area Fees - The area fee approach is much better than use fees for specific amenities (boat launches, beaches). It still falls short of allowing the charging of entry fees, which is the only logical way to go.	NWD	
Refunds - Our refund policy is a bit much. We should make every effort to grant on-site refunds when appropriate. We require payment up front without exception to get into our parks but we won't issue an immediate refund for a sick family member or someone discovering the facilities don't meet their needs.	NWD	Non-concur. No onsite refunds can be given
Annual Passes - This is my greatest area of concern. Why are we charging such outrageous prices for our annual passes, and why do we continue with our ridiculous practice of tying a pass to a vehicle? \$45 for a primary pass and for a second vehicle? Lets get real here and do what we do with every other pass or permit we sell - ascribe it to the PERSON who buys the pass, <u>not their vehicle</u> . My Dodge truck or my wife's Blazer has NEVER paid for a pass, but I DO. It should not matter whether I'm in one of my vehicles or letting a buddy pull my boat.....if I'm in the party and have my pass, that should be good enough. PLUS..... we need to have these moneys returned to the parks in which they are collected... that is the ONLY way day fees are viewed positively by the public.	NWD	Fee increase as required by CPI
The NRRS is not consistently referenced with the NRRS trademark symbol (i.e., Paragraph 9-4c.(5), page 9-5 of the EP and Paragraph 9-10.e. of the ER).	LRD	Concur-changed
General Comment - There is some confusion over the difference between a Special Event Permit Fee and a Special Activity Permit Fee. Suggest that a glossary be added to define the various fees, etc.	LRD	Non-concur
When would the Day Use fee changes be incorporated (1 Sept?)	NWD	1-Jan