

A Policy Implementation Analysis of the Recreation Fee Demonstration Program: Convergence of Public Sentiment, Agency Programs, and Policy Principles?

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ABSTRACT: In this paper I examine the relationships among (1) a set of principles to guide the design and implementation of recreation fee programs; (2) agency fee programs, objectives and actions; and (3) public sentiment toward recreation fees. The premise of this paper is that agency fee programs would benefit from a convergence of these three factors.

A set of guiding principles was adopted from Manning and others (1996). Public sentiment toward recreation fees was obtained from numerous sources, including scholarly and popular publications, newspaper articles, Congressional testimony, visitor survey data, and internal agency fee demonstration site evaluations. Twenty (20) distinct concerns regarding recreation fees were identified. Material on implementation of the Recreation Fee Demonstration Program was collected from each of the four administering agencies and examined to identify agency objectives or actions related to any of the identified public concerns or any of the guiding principles.

Of the 20 public concerns identified, at least five are political or philosophical in nature, and three are probably best characterized as research questions. These eight concerns are likely beyond the direct control of agencies to address when designing and implementing fee programs. Of the remaining 12 public concerns, agency fee programs appear to adequately address four. With some exceptions, the agencies have done an adequate job of operationalizing the guiding principles. There are four principles, however, that the agencies do not appear to be operationalizing adequately.

The final area of analysis is whether or not the guiding principles articulated by Manning and others (1996) adequately address public concerns about fees. There are five concerns that are not adequately addressed by the principles.

The agencies authorized by the fee demonstration legislation have a responsibility to look beyond the general nature of the legislation and undertake a more rigorous examination of the broader implications of their fee programs. Fee programs, as implemented by the agencies, need to have objectives beyond raising revenue and deciding what to spend it on, because charging and paying fees have implications that go far beyond that.

One recommendation would be for agencies to develop specific objectives for their fee programs that clearly reflect broader agency policy and philosophy. In addition, agencies need to more clearly articulate their criteria for determining when (for what) to charge fees.

KEYWORDS: Recreation fees, Fee Demonstration Program, fee principles

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Introduction

Public recreation is an important social service with an established purpose, but facing constant threat due to inconsistent funding. How can public lands recreation achieve sustainable financing with a combination of appropriated funding and on-site fees without the pitfalls of a revenue generation motive? Managers must avoid making management decisions based solely on revenue considerations, but rather focus on resource protection or human experience priorities. Agencies must adopt and implement fee policies that follow accepted principles in a way that reflects concerns the public has over paying fees for public lands recreation.

In this paper I examine the relationships among (1) a set of proposed principles to guide design and implementation of recreation fee programs; (2) current agency fee programs, including objectives and actions; and (3) public sentiment toward recreation fees. The premise of this paper is that agency fee programs would benefit from a convergence of these three factors—that is, that fee programs will be more accepted by the public, and be programmatically stronger, if they operationalize a set of guiding principles as well as reflect public sentiment.

Legislative Mandate of Recreation Fee Demonstration Program

Federal agencies have long had the authority to charge various recreation use fees. The Land and Water Conservation Fund Act of 1964 authorized seven federal agencies to charge entrance fees and facility use fees. More recent (1996) legislation (PL 104-134) states that the Recreation Fee Demonstration Program is being implemented “to demonstrate the feasibility of user-generated cost-recovery for the operation and maintenance of recreation areas or sites and habitat enhancement on federal lands.” Revenue generated from user fees will be spent to “increase the quality of the visitor experience” and may be used only for “backlogged repair and maintenance projects, . . . interpretation, signage, habitat or facility enhancement, resource preservation, [and] annual operation, maintenance, and law enforcement relating to public use.”

Conceptual Framework

Policy Implementation and the Role of Public Sentiment

Public policy is a three-step process of policy formulation and adoption, policy implementation, and policy evaluation and reformulation. Easton (1971:129-130) defined politics as “the authoritative allocation of values for society” and described policy as “a web of decisions and actions that allocate values. . . . Arriving at a decision is the formal phase of

establishing a policy. . . . When we act to implement a decision, we enter the second phase of a policy." The distinction between formulation/adoption and implementation reserves the fundamental distinction between the role of elected public officials (legislators) and appointed administrative officials (Mazmanian and Sabatier 1983). Nevertheless, administrators charged with implementing public policy often exercise a great deal of discretion, depending on the specificity or generality of the legislated or adjudicated policy decision. Implementation involves a variety of actions—acquisition of resources; interpretation of statutes into concrete directives; planning and designing programs necessary to carry out those directives; organizing human resources into bureaucratic units and routines; and finally, providing benefits and services to target groups (Ripley and Franklin 1986).

Policy scholars examining implementation of public policy have frequently noted that, besides the ability of the statute itself to structure implementation, non-statutory variables also affect implementation, among them public sentiment (Sabatier and Mazmanian 1980). Dunn (1981) cites the beliefs, values, and needs of those affected by the policy as a source of policy goals and objectives. Van Meter and Van Horn (1975), in one of the first theoretical treatments of the policy implementation process, note that public sentiment, and the extent to which private interest groups support or oppose the policy, may have a profound effect on the implementing agency. Likewise, Dunn (1981) models policy stakeholders as one of the three elements of the policy system, along with policy issue areas (e.g., defense, education, welfare) and the policy environment (the specific context in which events surrounding a policy issue occur). Given the potential influence of public sentiment on policy implementation, agencies need to understand and address public sentiment as they formulate concrete directives and design the programs necessary to carry out those directives.

Public Sentiment about Fees

Public sentiment toward recreation fees was obtained from numerous sources, including scholarly and popular publications, newspaper articles, letters to the editor of newspapers and magazines, Congressional testimony of interest groups, visitors' open-ended responses from survey data in three visitor studies—the King Range National Conservation Area (Martin and Widner 1998), Desolation Wilderness (Watson and others 1998), and the Boundary Waters Canoe Area Wilderness (Lime and Lewis 1997)—and from internal agency fee demonstration site evaluations contained in the 1998 multi-agency progress report to Congress (U.S. Dept. of the Interior 1998). Twenty (20) distinct concerns regarding recreation fees were identified; they are briefly described below and numbered for future cross-reference. No quantitative analysis was performed to ascertain the relative strength or frequency of each concern.

A common concern raised was that (1) recreation user fees are inappropriate or unfair because the public already pays for recreational

opportunities on federal lands through federal income taxes. Two related concerns are that (2) since recreation is a merit good similar to public education and public libraries (Peterson 1992), it should be supported primarily through appropriated tax revenues, not user fees; and (3) that recreation areas are part of the national heritage belonging to the public (our "birthright"), and as such, should be free to everyone (Andersen 1997; Martin and Widner 1998). The fact that the Recreation Fee Demonstration legislation was passed by Congress suggests that a majority in Congress, at least, have rejected these as legitimate concerns.

Concern over the disproportionate impact or regressive nature of user fees underlies two concerns: (4) that local users who visit more frequently could end up paying disproportionately more in fees (Walsh and others 1989; Peterson 1992); and (5) that low income users (including youth, educational, and nonprofit groups) will be disproportionately affected because user fees are regressive (the fee representing a larger proportion of a low-income individual's or household's income) (Lime and Lewis 1997; Watson and others 1998; Martin and Widner 1998). The concern in common is that people will be priced out of being able to visit an area; evidence exists that this concern may be justified (Reiling and others 1992).

Two concerns related to equity were identified: (6) that fees charged may not be equitable among different user groups, for example between commercial and noncommercial recreationists, or between backcountry users and visitors to developed sites (Hoffman 1997; Maharidge 1997; Simpson 1998a); and (7) that there was a fundamental inequity between the fees being charged to noncommercial recreationists—who do not convert public land resources into private profits—and the fees charged to commercial users of public land resources (e.g., timber, grazing, mining, water, commercial recreation concessions, and the film industry) (DeFazio 1996; Vento 1996; Desolation 1997; Idaho Statesman 1997; Press-Enterprise 1997; Thull 1997; NPCA 1998; Watson and others 1998).

Two concerns are related to the influence that charging fees may have on how an area is managed: (8) concern that fees will lead to an increased level of management in the area (Desolation 1997), and (9) concern that management decisions will be influenced by revenue considerations instead of, or in addition to, policy goals and objectives (Hinchman 1997; Durbin 1998).

Three concerns are related to how fee revenue would be used and how it would be viewed by Congress and the agencies: (10) public mistrust that revenue would be used appropriately and efficiently by agencies (Desolation 1997; Lime and Lewis 1997; Martin and Widner 1998); (11) concern on the part of both the public and agencies that fee revenue would eventually end up replacing rather than supplementing appropriated funding, thus erasing any net gains (Hinchman 1997; Lime and Lewis 1997; Simpson 1998a); and finally (12) that raising funds by charging recreation fees would discourage agencies from making a strong case to Congress for

appropriated funds (i.e., the agencies would find it easier to raise revenue by charging users than by having to justify funding requests to Congress) (Hanscom 1997).

Two concerns relate to the impact of fees on the visitor's relationship with agencies and on the type of experience: (13) one concern is that charging fees may alter the roles of visitor and agency provider to those of buyer and seller, a relationship less conducive to facilitating the social services role of recreation (Dustin and others 1987; Schultz and others 1988); a related concern is that (14) charging fees to use wilderness areas may interfere with or even preclude certain aspects of the wilderness experience, namely, feelings of freedom, autonomy, choice, and escape (Cockrell and Wellman 1985; White and others 1995; Lime and Lewis 1997; Christensen and others 1998).

Two concerns relate to facilities and services: (15) that charging fees may increase visitors' expectations for facilities and services provided (McDonald and others 1987; More and others 1996; Durbin 1998), possibly leading to a spiral of increasing development and higher fees, or engender feelings of entitlement on the part of paying customers; and (16) that fees are inappropriate or unjustified if no specific services or facilities (e.g., campgrounds, visitor centers) are provided (Martin and Widner 1998).

Remaining concerns include the concern that (17) charging fees may displace visitors to non-fee areas (Shasta-Trinity 1997; Martin and Widner 1998; Watson and others 1998) which may not meet their needs as well and may result in management problems; (18) that charging fees may discourage volunteerism and reduce feelings of stewardship on the part of visitors toward an area (Marshall 1994; Desolation 1997; Lundgren 1997); (19) that in some areas, given geographical and administrative realities, it will be difficult to design fee programs that make paying fees and complying with fee requirements convenient for visitors (Desolation 1997; Durbin 1998); and, finally, the concern that (20) charging cost-recovery fees to the people who visit parks and other natural areas for recreation sends the message that these places exist only as recreational areas and benefit only on-site visitors and not society at large (Lime and Lewis 1997). It should be noted that most of these concerns have rebuttal arguments that may challenge the veracity of these claims.

Guiding Principles in Fee Policy Implementation

Criteria are an essential component of any policy decision. In formulating and implementing policy, criteria are used to assist in choosing among alternatives, and in evaluating, they are used to judge the success or failure of the policy. In public policy literature (see Moore 1995), criteria act as guidelines or principles that most often reflect concepts of efficiency or effectiveness but may also relate to authority, justice, equity, adequacy, and responsiveness (see Anderson 1992; Dunn 1981).

Manning and others (1996) provide a set of principles that might guide the design and implementation of recreation fee programs. The design

principles are as follows: (1) Persons who benefit directly from facilities and services should pay a greater portion of the costs of provision. The payment of fees should be viewed as a statement of partnership between visitors and [agencies] to ensure stewardship of resources and provide reasonable access by visitors to those resources; (2) User fees and charges should be designed and administered on the basis of the best available knowledge of the costs of providing visitor facilities and services and the impacts of visitors on resources; (3) Every user of [an agency's] facilities and services should pay a fair share of the costs of providing those facilities and services; (4) Revenue raised through fee programs should be dedicated to ensuring stewardship of resources and providing public access to those resources; (5) Fees and charges represent only a portion of the revenues needed to develop, operate, and maintain [recreational resources and opportunities], and are not a substitute for society's investment in its [recreational resources and opportunities]; (6) The design of a fee program should be clearly linked to specific purposes (e.g., resource protection, visitor facilities and services, revenue generation) so as to guide its implementation; (7) Fee revenues should be shared, with part being retained for use where collected, and the remainder allocated under a clearly stated revenue sharing policy; and (8) User fees and charges should be structured and administered in ways that provide incentives for managers to collect fees and incentives for visitors to pay fees.

The implementation principles include the following: (9) Development and administration of user fees and charges should be accompanied by improvements in cost control, operational efficiency, use of partnerships, and accountability; (10) There should be a strong and visible linkage between the fees and charges paid by visitors and the quality of services and benefits received by visitors; (11) Fees and charges should be based, at least partially, on a consideration of private sector fees and charges and impacts on local communities; (12) Managers should be authorized and encouraged to administer user fees and charges with sensitivity to local opportunities, constraints, and issues of social equity; (13) Management of visitor use to protect resources and enhance the quality of the visitor experience is a legitimate goal of fee programs and a legitimate use of fee revenue; and (14) A continuing evaluation program to monitor and analyze the effectiveness of user fees and charges should be conducted, and should be funded by a portion of the revenues obtained through fees and charges.

Methods

Qualitative Analysis

Reports on implementation of the Recreation Fee Demonstration Program were collected from each of the four participating agencies—National Park Service, Forest Service, Bureau of Land Management, and Fish and Wildlife Service (NPS, FS, BLM, FWS). This material consisted of agency memoranda, the aforementioned Progress Report to Congress (which included internally conducted site-specific assessments of all Forest

Service and BLM fee demonstration programs), and the Forest Service Business and Communication plans for 49 Forest Service fee demonstration sites (39 of the 40 sites reported in the Report to Congress, plus 10 additional sites added in 1998).

Passages in these documents that related to any of the identified public concerns or any of the guiding principles were identified. Agency goals or objectives and any agency actions taken that reflected or addressed any of these concerns or principles were coded. This methodology is consistent with accepted qualitative data analysis (Berg 1998; Bogdan and Biklen 1992). With most qualitative data analysis, the source material must be read and reread in order to identify emerging or predominant themes. In this study, the "themes" were pre-identified as the public concerns and guiding principles. One of the cornerstone criteria for evaluating qualitative research is insightfulness, or "interpretation [that] allows the evaluator to see a set of qualitative data as a coherent pattern" (Thompson 1990, p.28). Once relevant passages were identified and coded, these passages were examined in order to discern coherent patterns in the data (i.e., to come to a conclusion as to whether or not the agencies were addressing public concerns and operationalizing guiding principles). It should be noted that in addition to examining relevant passages, it is important and useful to note what is not present, as this can be equally revealing. For this study, what was absent from the data was in fact significantly revealing as to whether or not agency policies or actions were addressing public concerns and operationalizing guiding principles.

Agency Objectives

Agency fee program objectives were identified in order to assess the extent to which they operationalized the guiding principles and to see if they addressed public concerns. Specific agency objectives for fee programs (in the form of desired outputs or conditions) were difficult to identify; general goals of catching up on backlogged maintenance and improving customer service, along with lists of specific projects on which to spend fee revenue, were mainly what could be identified. Individual internal assessments of fee demonstration programs contained in the report to Congress, as well as the business and communication plans from Forest Service fee demonstration sites, were examined (as described above) for additional evidence of operationalizing guiding principles and implementing fee programs that reflect public concerns.

Results

Are Agency Fee Programs Addressing Public Concerns?

Of the 20 public concerns identified, at least five are political or philosophical in nature, and as such, are probably beyond the control of the agencies to address directly through the design and implementation of fee programs (see Table 1). These concerns include the issue of double taxation—paying taxes to support public land management, then having to

pay again when visiting a site (1); the assertion that recreation is a social good that deserves to be subsidized so that public land recreation may remain free for everyone (2); the assertion that parks and other public recreation resources are part of the American heritage or birthright and, as such, should remain free (3); the issue of equity between fees charged to public land recreationists and fees charged to nonrecreational commercial users of public lands (7); and the concern that fee revenue will eventually replace appropriated funds (11). These concerns need to be addressed through the political process.

In addition, three of the concerns identified are probably best characterized at this time as research questions, and as such, may be beyond the direct control of agencies to address when designing and implementing fee programs: Do fees alter the roles of visitor and agency to that of buyer and seller (13)? Do fees increase visitor expectations for services and facilities (15)? And do fees displace users (17)?

Of the remaining 12 concerns, agency fee programs appear to adequately address four (see Table 1). Examination of the material described above shows that agency fee programs do address the concern that locals may end up paying disproportionately (4), primarily by offering reasonably priced annual passes that make it more cost effective for local users who access an area frequently. The vast majority of fee demonstration sites offered this type of "bulk discount."

Another concern that is adequately addressed is that fee revenue will be managed and used appropriately and efficiently (10). The agencies appear to have made a concerted effort to set up procedures by which fee revenue is handled and spent. Needs are identified prior to fee programs being approved, and approved business plans are required for each fee demonstration site before fee collection may commence. Furthermore, the legislation authorizing the fee demonstration program limits the amount of fee revenue that may be used to collect fees, thus avoiding the possibility that fee revenue will simply fund fee collection.

Agencies also appear sensitive to the need for fee requirements to be easy for visitors to comply with (19). Although there were a number of fee demonstration sites where visitors complained about the inconvenience of purchasing permits or passes, examination of the Forest Service business plans and the assessments in the Progress Report to Congress show that most sites made a concerted effort to make fee compliance as easy as possible; where there were complaints, managers recognized they needed to modify the program and, in most cases, have done so or intend to do so. For example, in Oregon, where a number of fee demonstration sites exist in close proximity to each other and to other fee jurisdictions (e.g. State Parks), the Forest Service, BLM, and Oregon State Parks are negotiating to develop a single multiagency Oregon coastal pass.

Finally, the concern that charging cost recovery fees implies that these areas are nothing more than recreation areas benefiting only on-site visitors

Table 1
Are public concerns addressed by agency programs?

Public Concern	Addressed by agency programs?
(1) Charging recreation user fees for public lands represents double taxation.	beyond agency control
(2) Recreation is a social good and should be supported by tax dollars.	beyond agency control
(3) Public land recreation resources are the birthright of Americans and should remain free	beyond agency control
(4) Locals will pay disproportionately.	yes
(5) Low-income individuals or households may not be able to afford the fees and will no longer visit, or will visit less frequently.	not adequately
(6) Fees may not be equitable among different recreational user groups.	not adequately
(7) Fees paid by individual recreationists versus fees paid by commercial users of public lands may not be equitable.	beyond agency control
(8) Fees may lead to an increased level of on-site management, facility development, access, commercialization, and/or law enforcement.	not adequately
(9) As user fees become a more important part of federal park and recreation budgets, management decisions will be overly influenced by revenue considerations.	not adequately
(10) Revenue will not be managed and used appropriately and efficiently.	yes
(11) Fee revenue will simply supplant appropriated funding.	beyond agency control
(12) When agencies need more money, they will find it easier to simply charge more or higher fees than make a strong case to Congress for appropriated funds.	notadequately
(13) Do fees alter the roles of visitor and agency to buyer and seller?	research question
(14) Charging fees for certain types of recreation experiences, particularly wilderness experiences, may run counter to the very nature of those experiences.	not adequately
(15) Will fees increase expectations for services and facilities?	research question
(16) Agencies will charge general access fees to areas that have no specific facilities.	not adequately
(17) Will fees displace users?	research question
(18) Charging visitors may reduce volunteerism and feelings of stewardship.	not adequately

Table 1—Cont.

Public concern	Addressed by agency programs?
(19) Fee requirements may be difficult for visitors to comply with.	yes
(20) Charging cost recovery fees implies that only on-site visitors benefit from preserving parks and recreation areas.	yes

(20) is addressed by the fact that few fee demonstration sites charge 100% cost recovery fees. The vast majority of fee demonstration sites charge fees that recover only a portion of what it costs to manage the site or area. In many cases the agencies have attempted to set fees that recover costs associated only with providing a specific service or facility to on-site visitors.

For the remaining eight concerns, it is difficult to find evidence that the agencies have taken steps to explicitly address these concerns (see Table 1). For example, there is still a very real concern that low-income individuals or households may not be able to afford the fees and will no longer visit, or will visit less frequently (5). Although pre-Fee Demonstration research (Gibbs 1977; Cordell 1985) found that user fees are a relatively small part of total trip expenditures and therefore tend not to deter participation, under the Recreation Fee Demonstration Program, user fees are being charged for facilities and services not previously charged for, and many pre-existing fees have been raised significantly. As many as 100 cars were observed turning around at the entrance station and leaving before paying the increased park entrance fee during a 16-day study at Glacier National Park in 1997 (Simpson 1998b). And it can now cost a family of four \$100 to go backpacking in some national parks for three nights. While this is inexpensive compared to three days and nights at a developed recreation resort or theme park, it may still deter families from participating. Every agency participating in the fee demonstration program recognizes the concern for low-income visitors; in fact, there is a section in the progress report to Congress (USDI 1998) titled "Fees to Promote Equity," which states that a "potential objective of a recreation fee system may be to ensure that no individuals are excluded by the fees." But there is little evidence that the concern is being translated into the design of fee programs, though fee demonstration sites give the required 50% discount to Golden Age and Golden Access passport holders. One Forest Service fee demonstration site (Sawtooth NRA) offers free passes to anyone declaring that the fee would keep him or her from being able to use the area due to economic hardship, and the National Park Service has one day each year when entrance fees are waived.

Another concern is that collecting fees may lead to an increased level of on-site management, facility development, access, commercialization, and/or law enforcement, ostensibly because more funds will be available

for these things (8). While some visitors may find increased on-site agency presence or additional facility development desirable, others may not. At present there is such a backlog of maintenance needs at most sites that it will probably be some years before fee revenue is available for substantial facility development. But where are the safeguards that prevent fees from resulting in increased development, which, in turn, begets more fees, which begets yet more development? Are "improvements" such as paving roads, increasing access, or building more facilities always improvements? A new infusion of funds available for capital improvements may prove tempting to many managers, and unless recreation sites have a priori objectives for the desired setting and experience, incremental changes may occur that permanently alter the character of the site. Examination of agency fee demonstration documents yielded no explicit recognition of this concern.

Many people have expressed the concern that as user fees become a more important part of federal park and recreation budgets, management decisions will be overly influenced by revenue considerations (9). Indeed, if park and recreation areas are required in the future to raise a certain portion of their annual operating budget through user fees (as California State Parks are now required to do), it is hard to imagine that revenue considerations would not play an important role in management decisions. Even if appropriated funds are not offset by user fees, as long as managers are allowed to keep most or all of the fee revenue they raise, what is to stop revenue considerations from becoming a driving force in management decisions? As government policy critics have noted for years (see O'Toole 1988), agencies are driven by a need to protect and enlarge their budgets. Is revenue generation the best basis for making resource or visitor management decisions? Again, there appears to be no explicit recognition of this concern in any of the documents outlining the agency fee programs. In fact, when units of the National Park Service categorize backpacking as a "special park use" (along with weddings and commercial filming) so that they may then charge cost-recovery fees for the activity, one must wonder if this concern is not already influencing management decisions. Certainly backpackers create management costs, but this begs the question why these costs are considered "recoverable," while management costs associated with some other visitor uses are not.

Some critics wonder if charging fees for certain types of recreation experiences, particularly wilderness experiences, may not run counter to the very nature of those experiences, thus diminishing the freedom, autonomy, choice, and escape that are such important parts of those experiences (14). In 1997 the NPS charged new backcountry camping fees at 14 sites, the BLM at 2 sites, and the Forest Service at 5 sites. At the Desolation Wilderness, the Forest Service decided not to charge user fees for day users but to instead suggest a voluntary donation at several popular trailheads. Beyond this example, there is no evidence that concern for fees impacting aspects of wilderness experiences was addressed in the design of fee programs.

Volunteers play an important role in operating many of our parks and recreation areas, and instilling a sense of stewardship in visitors has long been recognized as a key to resource protection. Yet some people suggest that charging visitors may reduce volunteerism and feelings of stewardship, replacing them with an "I've done my part by paying for this" attitude (18). Although a few Forest Service fee demonstration sites (e.g., Shasta-Trinity NF, White Mountain NF, Mt. St. Helens NM, and the Oregon/Washington NF trailhead fee program) addressed this concern by allowing people to volunteer in lieu of paying fees, the vast majority of sites across all four agencies made no such attempt.

While many, if not most, people seem to agree that fees charged for use of a specific facility such as a campground are appropriate, there is a concern that agencies would charge general access fees to areas that had no specific facilities (16). This concern appears to have been realized in at least some cases. Several National Forests (e.g., Shasta-Trinity NF, White Mountain NF, Sawtooth NRA, and the National Forests of Southern California) now require a permit to be displayed in the windshield of any unattended vehicle parked on National Forest land. Anyone driving a vehicle on a state or county road across National Forest land who pulls off the road to walk across Forest land is required to pay a fee. This raises two important questions: (1) When, and for what, is it appropriate to charge a user fee? and (2) What criteria are being used to determine when, where, and for what fees will be charged? Neither the progress report to Congress nor any of the plans for individual fee demonstration sites explicitly addresses these questions.

The need for equity, or distributive justice, is strong in humans (Rawls 1971; Homans 1974; Deutsch 1985). People feel the need to be treated fairly, relative to others around them. One of the concerns identified is that fees needed to be equitable among different user groups; no one wants to feel that he is paying more than his fair share (6). Certainly, there is recognition of this concern on the part of the agencies, yet results are mixed as to whether they are addressing this concern in the design of fee programs. There are several examples of different fees being charged to different user groups; this, in and of itself, is not necessarily a problem, since one of the principles articulated by Manning and others (1996) is to charge visitor fees based in part on the amount of resource impact caused. If higher fees for mountain bikers and equestrians than for hikers on the Hoosier NF, or higher fees for motorized users relative to mountain bikers on the Mark Twain NF, are justified on the basis of resource impacts, then the different fees are not necessarily inequitable. It may be harder, however, to justify charging a \$20 reservation fee to noncommercial boaters on the Rogue River, while commercial boaters are not required to pay such a fee. Another example that has raised concerns about inequity is the additional fee charged to backpackers in national parks (ostensibly to recover costs of managing backcountry recreation), including in some parks an "impact fee," while frontcountry users pay no additional fee for their use of the

extensive infrastructure built and maintained for vehicle use, or the impact caused by such use. Again, although this concern is surely recognized by the agencies, without explicit decision criteria or specific objectives for their fee programs, it is difficult to see how this concern is being addressed in the design of fee programs.

The last concern is that when agencies need more money, they will find it easier to simply charge more or higher fees than make a strong case to Congress for appropriated funds (12). While this is not a concern that can be easily or directly addressed in the design and implementation of fee programs, it is a concern that needs to be addressed in some overall fee policy of the agencies.

Are Agencies Operationalizing Design and Implementation Principles?

In addition to fee programs being designed to address public concerns, a strong fee program would also operationalize a set of guiding principles, for instance, the principles articulated by Manning and others (1996). For the most part the agencies have done an adequate job of operationalizing the guiding principles, with some exceptions (see Table 2). For example, with fee programs, the people who benefit directly from facilities and services now pay a greater portion, and a fair share, of the costs of provision (principles 1 and 3). The revenue from fees is being used to ensure stewardship of resources and to provide public access to those resources (principle 4). At present, fees are being charged that represent only a portion of the revenue needed to develop, operate, and maintain recreational resources and opportunities, and do not serve as a substitute for society's investment in those resources and opportunities (principle 5). Fee revenues are being shared, with most remaining for use where collected, but a portion being available for redistribution (principle 7). Fees are being administered in ways that provide incentives for managers to collect them, and for the most part, in ways that provide incentives for visitors to pay them (principle 8). The agencies appear to have made a concerted effort to use the fees effectively and efficiently, and in ways that are accountable (principle 9). Fees are being used for projects such that visitors can see a strong and visible link between the fees they pay and the quality of services and facilities (principle 10). Fees are being based primarily on fair market value and a consideration of private sector fees (principle 11). Managers have the authority, and in some cases have exercised it, to set fees that are sensitive to local constraints and to issues of social equity (principle 12), although perhaps the issue of social equity could be addressed more strongly.

There are four principles, however, that the agencies do not appear to be operationalizing adequately (see Table 2). Principle 2 states that use fees and charges should be designed and administered on the basis of the best available knowledge of the costs of providing visitor facilities and services and the impacts of visitors on resources. This is probably the most difficult principle to adhere to, since it encompasses two major issues about which there is inadequate knowledge. To fully operationalize this principle,

managers would have to know much more about the value of on-site benefits vs. off-site public good values, and they would need to know more about the marginal costs of providing services and facilities to visitors. The Forest Service has made some progress on this last point by tying its fees to what it costs it to fully achieve Meaningful Measures standards, and Desolation Wilderness managers have tried to differentiate between the costs of providing for public use of the wilderness and the costs of managing to protect ecosystem health and preserve other wilderness values. But generally, the agencies should work at designing fee programs that reflect on-site costs and benefits and off-site public good values.

The second issue contained in principle 2 is that fees should be based in part on the impact of visitors. How much impact different types of visitors cause relative to one another is still a matter of some debate, and even if research can eventually produce some ordinal-level spectrum of visitors and their impacts, monetizing that information into a fee schedule would be difficult.

Principle 6 states that design of a fee program should be clearly linked to specific purposes (e.g., resource protection, visitor facilities and services, revenue generation) so as to guide its implementation. In a strict sense, agencies have clearly linked their fee programs to specific purposes, but those purposes tend to be simply lists of specific project needs, rather than fee policies designed to reflect broader agency policy and philosophy. In other words, the fee programs appear to be viewed simply as a means to fund specific project needs, not as a tool to realize any broader agency goals or vision. When the superintendent of a national park is quoted as saying, "We don't have a people problem, we have a car problem. We've created automobile-based recreation, which has spawned an entire way of looking at the parks" (Margolis 1997), but that same national park charges additional "impact" fees to backpackers while charging no additional fees to frontcountry vehicle-based visitors, it seems that fee policies are not being used to achieve broader agency goals.

Similarly, principle 13 states that visitor management is a legitimate goal of fee programs. Yet the agencies appear to have focused almost exclusively on the goal of revenue generation to the exclusion of using fee policies to achieve other goals. There is agency recognition of other possible goals or uses of fee programs and policies; the progress report to Congress lists several: fees as a management tool, fees to promote personal contact with visitors, fees to promote equity, fees to nurture public support, and fees to recover costs, in addition to fees to generate revenue. But there is very little evidence that any but the latter two are being pursued. This may be due in part to the fact that using fees to achieve policy goals is more sophisticated and difficult than using fees to recover costs and generate revenue.

Finally, principle 14 states that a continuing evaluation program to monitor and analyze the effectiveness of user fees and charges should be conducted. Yet the majority of monitoring and evaluation to this point has

Table 2
Are fee principles addressed by agency programs?

Fee Principle	Addressed by agency programs?
(1) Persons who benefit directly from facilities and services should pay a greater portion of the costs of provision.	Yes
(2) Fees should be designed and administered on the basis of the costs of providing visitor facilities and services and the impacts of visitors on resources.	Not adequately
(3) Every user of [an agency's] facilities and services should pay a fair share of the costs of providing those facilities and services.	Yes
(4) Revenue raised through fee programs should be dedicated to ensuring stewardship of resources and providing public access to those resources.	Yes
(5) Fees and charges represent only a portion of the revenues needed to develop, operate, and maintain [recreational resources and opportunities], and are not a substitute for society's investment in its [recreational resources and opportunities].	Yes
(6) The design of a fee program should be clearly linked to specific purposes.	Not adequately
(7) Fee revenues should be shared, with part being retained for use where collected, and the remainder allocated under a clearly stated revenue sharing policy.	Yes
(8) User fees and charges should be structured and administered in ways that provide incentives for managers to collect fees, and incentives for visitors to pay fees.	Yes
(9) Development and administration of user fees and charges should be accompanied by improvements in cost control, operational efficiency, use of partnerships, and accountability.	Yes
(10) There should be a strong and visible linkage between the fees and charges paid by visitors and the quality of services and benefits received by visitors.	Yes
(11) Fees and charges should be based, at least partially, on a consideration of private sector fees and charges and impacts on local communities.	Yes
(12) Managers should be authorized and encouraged to administer user fees and charges with sensitivity to local opportunities, constraints, and issues of social equity.	Yes
(13) Management of visitor use to protect resources and enhance the quality of the visitor experience is a legitimate goal of fee programs and a legitimate use of fee revenue.	Not adequately
(14) A continuing evaluation program to monitor and analyze the effectiveness of user fees and charges should be conducted, and should be funded by a portion of the revenues obtained through fees and charges.	Not adequately

focused on the questions of whether the public is willing to pay, and if so, how much? Monitoring and evaluation efforts thus far have failed to adequately address other important questions about how fees affect visitors, such as whether fees are displacing people, whether paying fees changes the nature of the experience, whether paying fees changes the attitudes of visitors toward the resource and the managing agency, and whether paying fees increases visitors' expectations for services and facilities.

Do the Principles Address Public Concerns?

The final area of analysis is whether or not the guiding principles articulated by Manning and others (1996) adequately address the public concerns about fees. There are five concerns that are not adequately addressed by the principles: concern over fees leading to an increased level of management, including increased development, access, commercialization, and law enforcement (8); concern that management decisions will be influenced by revenue generation considerations (9); concern that wilderness fees will interfere with feelings of freedom, autonomy, choice, and escape (14); concern that fees will displace users (17); and concern that fees will negatively impact volunteerism and stewardship attitudes (18). Developing principles that address these concerns would strengthen the utility of the guiding principles put forth by Manning and others.

Implications

Research

There are still some large knowledge gaps in our understanding of how fees may affect people and what an appropriate fee is. Perhaps not coincidentally, some of these knowledge gaps are reflected in the concerns (listed in the previous paragraph) not adequately addressed by guiding principles. Unanswered questions include: Do fees cause visitor displacement? Do fees restrict participation for some people? Do fees increase visitor expectations for services and facilities? Does fee payment interfere with freedom and autonomy, and how can this be minimized? And perhaps most important, can on-site, off-site, merit, and marginal costs and benefits be fairly determined?

Policy

The recreation fee demonstration legislation authorizes the agencies to experiment with new fees, and specifies that fee revenues will be used for backlogged maintenance and improved customer service. But administrative agencies are given wide discretion in implementing mandates formulated by Congress. The agencies authorized by the fee demonstration legislation have a responsibility to look beyond the general nature of the legislation and undertake a more rigorous examination of the broader implications of their fee programs, as well as the on-the-ground implications of fee decisions. Fee programs, as implemented by the agencies, need to have objectives beyond raising revenue and deciding what to spend it on, because charging and paying fees have implications that go far beyond that.

While the agencies have made a legitimate attempt to assess the public response to fees as a way of answering the question "Is the public willing to pay?", they have made little attempt to address questions such as "How might fee programs influence management decisions?", "How might the development of recreation sites be influenced by fees?", "How might the visitor's experience, and relationship to the agency, be affected by a requirement to pay fees?", and the most fundamental question, "When (under what conditions) is it appropriate to charge recreation fees?" These issues remain to be addressed both by research and management, and represent implications of fee programs that are not adequately addressed by current fee programs and policies.

One step toward resolving this problem would be for the agencies to develop specific objectives for their fee programs, objectives that go beyond simple revenue generation and listing projects on which to spend the funds, and instead describe desired outputs or conditions. Agencies should develop objectives that address issues such as the restriction, exclusion, or displacement of certain groups of users; the impact on volunteer participation; the impact on stewardship attitudes; the influence of revenue considerations on management decisions; the impact on certain aspects of the visitor experience (e.g., freedom, autonomy); the perceived equity among different user groups; and the potential spiral of increased development at sites. Other objectives could address issues not discussed in this paper, such as using fees to reduce depreciative behavior, using fees to redistribute visitor use and reduce congestion, setting fees so as to encourage certain activities (e.g., activities that are primarily educational in nature), and so on.

Agencies should make sure their objectives clearly reflect broader agency policy and philosophy. For example, if the National Park Service wants to discourage automobile congestion in parks and encourage meaningful, personal contact with park resources, fee policies should reflect that desire by not penalizing visitors who want to backpack with additional fees, while essentially subsidizing (by not charging additional fees) visitors dependent on an extensive automobile infrastructure. Certainly, in some cases, site-specific management concerns may make it challenging to formulate and implement fee policies consistent with overall agency philosophy.

In addition, agencies need to more clearly articulate their criteria for determining when (for what) to charge fees. For example, should fees be charged only for the use of specific services and facilities, or is it appropriate to charge fees for general access?

Finally, although beyond their direct control, agencies cannot ignore two major public concerns that are political in nature—examining the equity of fair market value fees charged for recreational public land use relative to fees paid by commercial public land users, and ensuring that fee revenue will not simply supplant normal appropriated funds, resulting in no net gains for recreation programs.

As a society, we have made a fundamental decision that recreation is good for our citizens and that we want to make sure our citizens have access

to natural areas for recreation. This is similar to public education—everyone pays into the system regardless of whether they have children in school because we recognize that education is something everyone should have equal access to, and because we recognize that education is good for society as a whole, not just for the children being educated. Public libraries operate on the same principle. Outdoor recreation is a similar social service with similar public value, and we need to carefully design fee programs to ensure that recreation fees charged for public land use do not violate this principle.

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