

CONFLUENCE
RESEARCH AND
CONSULTING

JOHN DAY

WILD AND SCENIC RIVER

PERMIT SYSTEMS

PAST USE, COMMERCIAL
NEEDS ASSESSMENT,
ALLOCATIONS, AND
MANAGEMENT
ALTERNATIVES

BUREAU OF LAND MANAGEMENT
PRINEVILLE DISTRICT



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Chapter 1. Introduction

The John Day River runs 317 miles from headwaters in the Blue and Ochoco Mountains through central Oregon before emptying into Lake Umatilla, a segment of the Columbia River bounded by dams. The fourth-largest watershed in the state, the river travels through forest uplands, ranchlands, and deep basalt canyons, providing diverse opportunities for outdoor recreation.

- The river is popular for boating, with Class I-III whitewater, sublime canyon scenery, excellent fishing, and camping on uplands and occasional beaches. It offers single-day and multi-day trip options.
- The river has boating flows for a relatively short season. The prime use season is from mid-May through the end of June, although some segments are used later in the summer and fall.
- Bend/Madras/Prineville and cities in Willamette Valley account for most of the use, although users also come from other Northwest states.
- BLM recognizes impacts from growing recreation use and has established regulations to protect resources and experiences (including limits on types and amounts of use since 2011). Capacities for overnight boating trips are based on campsite availability, and generally allow groups to camp away from others. On some segments during the prime boating period, demand for overnight permits exceeds capacities.
- BLM has allocated self-registered onsite permits since 1998, and through web-based reservations platforms since 2011 (it has been managed through the US government-operated recreation.gov system since 2020). Permits are required for both guided and unguided boaters, who compete in the same pool for permits. There have been concerns about the availability of permits, mechanisms for obtaining permits, and percentages of use in different segments.
- This report reviews issues related to use, capacities, and allocation systems. It summarizes background information, assesses commercial recreation needs, and develops allocation options and alternatives. This report is not a decision document; it provides information for BLM to consider if it chooses to modify allocation decisions, probably through a NEPA-based process such as an Environmental Assessment (EA).

Report Organization

Following this introduction, the report is organized into four sections (chapters 2-5).

- **Background.** Chapter 2 provides background about the river, a timeline of its management, a review of key management actions that form the basis for existing capacities, and a summary of recreation use patterns.
- **Commercial needs assessment.** Chapter 3 describes existing and potential commercial use on the John Day River, and reviews questions that assess whether such types and amounts of use is appropriate for the river.
- **Allocation definitions, issues, and levers.** Chapter 4 reviews issues that have risen as capacities and allocation systems have been developed on the river. It includes term definitions and a list of issues, including a summary of BLM-prompted comments by outfitters and guides about current and possible allocation options. It concludes with a list of levers or types of decisions that BLM can adjust to address allocation issues or achieve different allocation outcomes.
- **Permit system alternatives.** Chapter 5 describes and then summarizes the current allocation system and three possible, practical allocation alternatives, along with their advantages and disadvantages.
- **Appendices.** John Day information from the Recreation.gov website, John Day boater reviews, use level graphs, and flow vs. cancellation graphs.

Study Objectives

The present study was designed to meet the following objectives:

- Describe the resource and recreation opportunities.
- Describe existing and potential uses.
- Assess the need for commercial uses.
- Describe issues with current permit system and allocations.
- Develop alternative ways of allocating use to address concerns with current system.

Chapter 2. Background Information

Resource Description

The John Day River (including the North Fork) includes about 275 river miles (174 below the confluence). BLM river management plans divide the river into ten segments (Map 1), but capacity and allocation decisions covered in this report apply to Segments 1 through 3, with a particular focus on overnight use on Segments 2 and 3. Brief descriptions of the physical setting of each segment follow.

Upstream of Kimberley (Segments 6, 7, and 8)

Segment 8 includes the North Fork from RT 52 Bridge / North Fork John Day Campground to Camas Creek and features 43 miles of class II-V whitewater. There are backcountry recreation opportunities in designated Wilderness. Opportunities are similar to Segment 2, but Segments 6-7-8 have much lower use levels, in part because boatable flows are available only during peak run-off.

Segment 7 runs from Camas Creek to Monument, and has 42 miles of class II-III whitewater. It offers a mix of private and public land along the river, including a few agricultural parcels close to Monument. There is a gravel road along the river right bank and some recreation sites with road access. This segment has recreation opportunities in a Semi-Primitive Motorized setting, although some areas are similar to the Primitive sections on Segment 2 and Roaded Natural sections on Segment 3. It typically has low use on weekdays even in the prime season, but it is more popular on weekends and holidays.

Segment 6 runs from Monument to the North Fork Confluence and features 16.5 river miles of class I-II whitewater. It is similar in character to Segment 4, with few campsites, mixed agricultural use, and Highway 402 adjacent to the river.

On all three segments taken together, use averages fewer than one launch per day, even during peak runoff in late May and June. After June high flows, boating is rare.

Kimberly to Service Creek (Segment 4)

Highway 19 is adjacent to the river along this 27-mile reach, and connects the three small towns of Kimberly, Spray, and Service Creek. The terrain is open high desert with some agricultural/grazing lands; the river features pools and long runs with short riffles. There are a few buildings and roads visible from the river. There are several boating access areas along the reach, which is primarily used by day floaters for fishing.

From the confluence of North Fork and John Day River to Service Creek, the river has class I-II whitewater. Ranches, Highway 19, and the town of Spray are the focus of segment; recreation opportunities are consistent with the Roaded Natural classification on Segment 3. It has few campsites, so boaters mostly camp at developed campgrounds. This segment averages a few launches per day during the peak season but almost no off-season use. About 10% of use is commercial (all day use).

Service Creek to Clarno (BLM Segment 3)

This 48-mile segment is heavily used by boaters and is well described in guidebooks. This reach features several Class I/II rapids and long stretches of flat water in a high desert canyon; the gradient is about 8 feet per mile. There is a 13-mile trip in this segment from Service Creek to Twickenham (3A), but boaters often take longer trips from Service Creek to Clarno (or from Twickenham to Clarno, 3B).

The segment features fishing and camping in a scenic canyon, but also offers access to historical and cultural sites, with opportunities to learn about the natural history and wildlife in the area. There is extensive private land between Service Creek and Twickenham, and toward the end of the segment, with some ranches and associated agriculture. However, the reach is generally without large-scale human development, and there is considerable BLM-managed public land for camping, fishing, and day use.

Segment 3 is managed as a Roaded Natural River setting, which falls between Roaded Natural/Rural and Semi-Primitive Non-Motorized. Medium-density recreation is concentrated at developed recreation sites and agricultural activities may be encountered. Human sights and sounds from other campsites may be observed but do not generally detract from natural sights and sounds. Boaters experience a moderate number of encounters with people outside of their group. Contact with other groups is expected and may be near-continual on peak use weekends, but some opportunities for solitude remain.

Segment 3 is further divided into Segment 3A (from Service Creek to Twickenham) and Segment 3B (from Twickenham to Clarno).

BLM's daily capacity on Segment 3 is 24-day trips plus 19 overnight trips. Two overnight permits per day from Segment 3 are designated as long-distance permits, allowing boaters to put-in upstream of Segment 3 and float through Segment 1; these add to single segment permits to produce eight overnight launches per day on 3A and nine on 3B. The capacity on Segment 3 was set to ensure that boaters experience no more than 15 river encounters per day (once they have left road-accessible recreation sites) and less than 70% campsite occupancy in the first 15 miles below access points for Segments 3A and 3B.

Clarno to Cottonwood Bridge (BLM Segment 2)

This is the other segment heavily used by boaters; it is also covered in all four guidebooks. This 69-mile reach has a slightly steeper gradient than Service Creek to Clarno (11 feet per mile), as well as the most difficult rapid on either reach (Clarno Rapid, Class III). The segment has been divided into two subsegments: Segment 2A is from Clarno to Thirtymile; Segment 2B is from Thirtymile to Cottonwood.

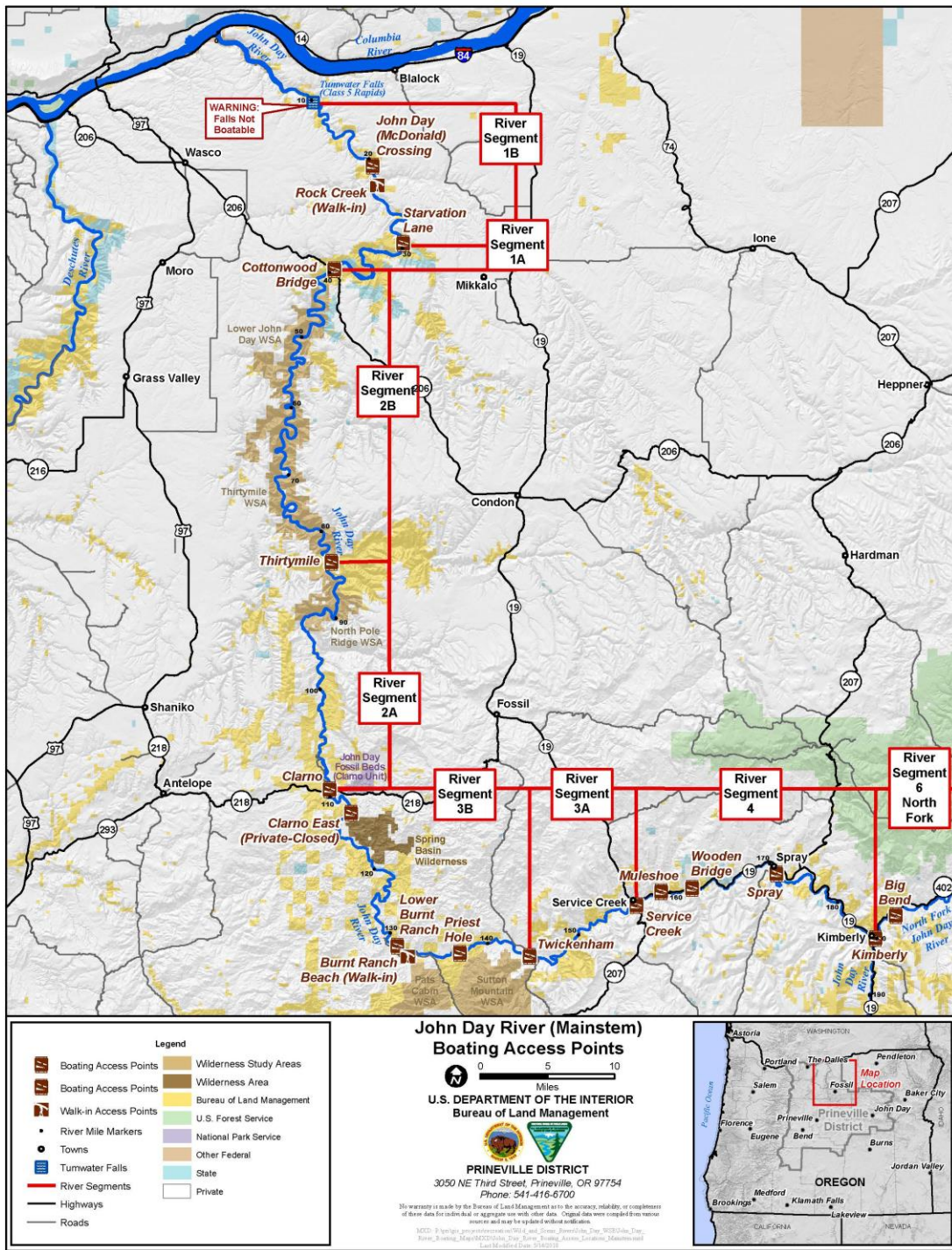
Rapids and riffles tend to feature more rocks and boulders than the gravel bar riffles on upstream segments. Segment 2 also features a deeper canyon than adjacent segments, and generally has more impressive scenery that includes exposed basalt formations. A longer reach with less human development (and usually more solitude) than the segment above Clarno, many boaters take 4 to 5 days to float from Clarno to Cottonwood Bridge.

Segment 2 is designated and managed as Semi-Primitive Non-Motorized or backcountry recreation setting where low density dispersed recreation occurs in a largely undisturbed and remote natural environment isolated from the sights and sounds of human activity. Adjacent camps may be visible, but they are spaced so groups at different camps can experience a sense of privacy. Boaters experience few interactions with people not in their group.

The capacity on Segment 2 is nine launches per day (five on 2A and four on 2B) including day and overnight use (although day trips on Segment 2 are rare). The capacity on Segment 2 was set to ensure that boaters experience no more than 7 on-river encounters per day (once downstream from road access launches) and less than 70% campsite occupancy below the start of Segments 2A and 2B.

Cottonwood Bridge to Tumwater Falls (BLM Segment 1)

Terrain in this final 30-mile segment features a slightly wider basaltic river canyon as the John Day flows into the Columbia. The river features flat water with occasional riffles; Tumwater Falls at the end of the segment is an exception. The falls is generally not boated and is probably Class IV/V (boatable at some flows, but very challenging). There is less public land below McDonald Ferry (river mile 21), and few boaters appear interested in portaging the falls or paddling the 10 miles of flatwater (on Lake Umatilla) to the Columbia. There is public access by road at Cottonwood Bridge and McDonald Ferry; some recreation users take motorized craft down this section from Cottonwood Bridge and return upstream after fishing or hunting.



Map 1. John Day River boating access and segments.

Timeline on capacity/allocation studies and management

1970	Portions of the river are designated as an Oregon State Scenic Waterway.
1979	Initial federal Wild and Scenic River study.
1988	Congress passes the Oregon Omnibus Wild and Scenic Rivers Act which designated portions of the John Day River as Wild and Scenic.
1990s	Recreation use on the John Day River substantially increases.
1998	Boater self-registration program begins.
1999	BLM begins extensive campsite condition monitoring along the river.
1999	John Day WSR Draft Plan and EIS.
2000	Proposed management plan for Two Rivers and John Day River.
2001	River Management Plan and Environmental Impact Statement (EIS) finalized. Plan includes proposed study of recreation use and step-down visitor use planning.
2001	BLM begins step-down planning including a study to assess social conditions, boater preferences, and opinions about possible management actions.
2002	First season with required registration (permit) program; there is no limit (capacity).
2006	Initial results from LAC study find high boating use produces several social and resource impacts. First capacity determination based primarily on campsite occupancy standards.
2008	LAC study published; BLM adopts management objectives for the river. Includes analysis of 1998-2008 use and impact data.
2010	John Day River Study Environmental Assessment finalizes findings and capacities.
2011	First season with defined capacities, start of State/BLM website for reserving permits.
2012	1 st Permit System Report documents 2011 reservation/permit challenges.
2013	2 nd Permit System Report documents 2012 reservation/permit challenges. BLM-managed website stops enforcing capacities from 2013 through 2019.
2015	John Day Basin Final Plan (encompasses more than just the river corridor). Solidifies existing management program, including capacities and allocation principles from earlier John Day WSR Plan.
2019	Pre-Covid-era peak use. Recreation.gov platform announced for future permit reservations (which will enforce capacities).
2020	Covid summer – low use in early season. Anomalous data has not been used for this study. Fees for permits begin through recreation.gov.
2021	First post-Covid year, but lower flows may have depressed use below the 2019 peak.
2022	Representative year for use levels with typical weather and flows.
2023	BLM Initiates commercial needs analysis and permit system alternatives review (this report).

Summary of John Day River recreation studies and management

WSR Designation and River Management Plan (1988 to 2006)

Recent management for the John Day River begins with its Wild and Scenic River designation in 1988 as part of the Oregon Omnibus Wild and Scenic River Act. The outstanding and remarkable values for which the river was designated included scenery, recreation, fish, wildlife, geology, archeology, and history. All 147 miles of the designated river below the North Fork confluence were classified Recreational (“readily accessible by road or railroad, with some development along their shoreline”).

The Two Rivers Resource Management Plan for the John Day River was developed from 1985 (before designation) through 2001 (designation finalized); “two rivers” refers to the main stem and South Fork. This large-scale Resource Management Plan primarily covered basin-wide decisions about uses on public lands such as grazing, timber, and mining. Aside from identifying the river’s outstandingly remarkable values the plan provided less guidance on most recreation issues, although it set the stage for future step-down river management planning using the Limits of Acceptable Change (LAC) process. It also established principles for future allocation of use: “Trip permits would be allocated through a first-come, first-served common pool reservation system to all users in the same manner. The applicable use fee would be due in advance to hold a reservation. Any canceled trip permits would again become available for reservation.” (USDI Bureau of Land Management 2001, p. 18.).

John Day River Study and Environmental Assessment (2006 to 2011)

The process for addressing visitor management issues included a LAC study and follow-up NEPA planning that occurred from roughly 2006 through 2011. LAC is a recreation planning process for addressing visitor use impacts. It outlines a systematic approach for identifying the desired resource, social, and managerial conditions for an area, then maintaining these conditions over time. It is similar to other recreation planning processes such as Carrying Capacity Assessment Process (C-CAP), Visitor Impact Management (VIM), and Visitor Experience and Resource Protection (VERP), all of which have been integrated into a more recent planning process, the Interagency Visitor Use Management (IAVUM) framework.

These processes identify indicators and standards (aka thresholds in the IAVUM). **Indicators** measure the state of desired conditions (the amount of impact), while **standards** determine the amount of change that will be allowed (define how much impact is too much). As impacts approach standards, triggers activate **management actions to prevent unacceptable condition changes**. Capacities or use limits are possible management actions in these processes, and an explicit step in the latest inter-agency version. If monitoring indicates that standards are being violated, managers are expected to apply one or more management actions to reverse or prevent unacceptable impacts.

The John Day study addressed several impacts on the river associated with increased use in the 1990s and 2000s (see discussion on use patterns below). Findings included:

- Trees are an important resource at riverside campsites because they provide shade, but trees were damaged or killed as campers cut them for firewood. Campsite trees were becoming a scarce resource along the river and needed more protection.
- Desirable campsites along the river (those with adequate flat ground, distance or screening from adjacent campsites, and shade trees) are limited.
- Intensive boat-based camping use from mid-May through mid-July had resulted in some unacceptable social impacts, including campsite availability and encounters. The number of overnight boating groups sometimes exceeded the number of campsites on public land, requiring boaters to share camps or camp on private property. It also produced higher camp encounters (camping within sight or sound of others), reducing opportunities for solitude. This further increased competition for available campsites, sometimes leading to conflicts between groups.
- There were notable levels of congestion at access points.
- Occasional conflicts occurred between landowners and boaters who sometimes camped on private lands without permission. Landowners were concerned about impacts to their property including litter, wildfire risk, and liability for accidents and vandalism.

The John Day River Study identified physical, social, and managerial conditions to monitor (indicators) and established standards defining minimal acceptable conditions (aka desired future conditions or DFCs), and possible management responses if indicators exceed standards. The study did not analyze alternatives for managing boaters to preserve those conditions, but these were later considered in a NEPA planning process that produced a multi-agency ***Environmental Assessment (EA)***. Cooperating partners included the Confederated Tribes of the Warm Springs Reservation, Oregon Parks and Recreation Department, Oregon Department of Fish and Wildlife, Oregon Department of State Lands, and the John Day Coalition of Oregon Counties.

The EA restated the Outstandingly Remarkable Values (ORVs) defined by the Oregon Omnibus Wild and Scenic River Act, but further addressed visitor management. Monitoring showed that most ORVs were protected or enhanced but some may be under stress at peak use. The study concluded that non-recreation values were being protected under existing management, so the EA focused on recreation and social impacts, especially on-river encounters and campsite competition. Public input indicates use levels during peak season had reached a level that required BLM to prescribe a capacity. The EA introduced the idea of a capacity to protect and enhance ORVs on Segments 2 and 3.

What was not covered by the EA

Developing a system for allocating permits to non-commercial and commercial boaters was deemed outside the scope of the EA because it was already addressed in the 2001 John Day River Plan (calling for a common pool if use limits were prescribed). Implementation of the common pool on the John Day was also contingent on common pool success on the Deschutes River. A 2009 study by Oregon State University researchers confirmed the common pool was working on the Deschutes (Oregon State University, 2009).

BLM did not charge fees at the time of the EA but expressed interest in doing so eventually. Because the BLM already had the authority to charge fees, that was also considered outside the scope of the EA (in addition to grazing, campsite cleanliness, and tree damage). The EA revised the existing river plan by choosing not to develop additional campsites to increase boating capacity: “new recreation sites will not be developed except to replace existing sites that need to be closed to protect resources” (USDI BLM, 2001). The EA also included a caveat that the boating capacity could increase by two through land acquisition. BLM acquired land near Thirtymile and added two permits for Segment 2, one long distance launch and one launch at Thirtymile.

The EA also considered prescribing a capacity for numbers of individual boaters rather than groups but decided this would not address the primary social impact problems, which were campsite competition and on-river encounters.

Commercial use

The EA recognized a need for commercial outfitters to help make boating more accessible for users who don't have the skills, equipment, or physical requirements to organize and lead a trip themselves. At the time, commercial use was estimated at 10 to 15% of total boating use on the John Day, with 23 authorized outfitters. The estimated proportion of commercial use was higher in 1998 when total use was lower; in that year, BLM estimated commercial use was about 20% of total use, with 34 permitted outfitters. The total number of commercial trips, particularly overnight trips, did not appear to decrease during this period; non-commercial growth simply outpaced commercial growth. The EA included an economic impact analysis of visitor spending, commercial trip pricing, guide/outfitter employment, non-monetary values, and environmental justice.

Alternatives

The EA considered two action alternatives and a no action alternative. Both action alternatives would establish a permit system for day and overnight boating. Capacities would be enforced during the peak season in spring and early summer only, with boaters required to obtain a permit in advance by phone or website, multiple release dates, with cancellations allowed to be issued to other boaters. Permits would be available on-site by self-registration outside of the primary boating season.

Both action alternatives used the same rate of on-river encounters to establish a capacity. The difference between the alternatives was handling campsite occupancy rates for the first 15 miles below launch sites. In one alternative the capacity assumed 70% campsite occupancy but boaters would not need camp-specific reservations; the other alternative assumed 100% occupancy with assigned first-night camps.

Record of Decision

BLM chose the alternative without campsite reservations to avoid unnecessarily restricting boaters from on-river decisions about how far to travel in a day or where to camp at night. This meant fewer launches each day, but more freedom for boaters during trips. Unlimited day trips would be allowed between Clarno East and Clarno Bridge on a trial basis (pending acquisition of Clarno East boat ramp).

Early years of permits (2011-2012)

BLM required permits for all Segment 2 and 3 overnight boating trips starting in 2011. Permits were first-come/first-served through a State of Oregon online reservation system, similar to the one used for the nearby Deschutes River.

- Capacities were based on the river study results (to meet campsite availability standards), with 9 overnight trips per day on Segment 2 (all launches combined) and 19 overnight trips on Segment 3 (9 from Service Creek or upstream of Service Creek, and 10 from Twickenham, Priest Hole, or Lower Burnt Ranch).
- The system also set a limit of 24 day-trips on Segment 3 between Service Creek and Clarno.
- Permits were required for the peak season, May 20 to July 10.
- Half of permits were available on March 1, and the remaining half plus cancellations on May 1.
- There was no fee for making a reservation or obtaining a permit. Boaters had to confirm use of the permit 7 to 30 days before a launch date or their permit would be automatically cancelled (becoming available to others).
- Permits for popular launch dates were reserved very quickly after online releases, indicating strong demand.
- BLM was concerned that some apparent demand was members of the same group reserving multiple permits until weather, flows, or schedules clarified the best date for the group. The group might use one permit and not cancel the others, leaving them unavailable. With no fee for reservations or confirmations discouraging this behavior, BLM concluded that non-refundable fees might help.
- Based on feedback from boaters, BLM also concluded that a shorter confirmation window would offer slightly more lead time for use of cancellations.
- Field observations from this first year suggest nearly all users were aware of the new permit requirements before arriving at the river. Out of 500 actual trips on the river, BLM field staff issued 14 permits to groups who had an inadequate permit or no permit (so in the first year about 7% of boaters were ignorant or non-compliant, but they were not penalized and took their trips).
- Capacities, season length, release schedule, and reservation rules were similar in the permit system's second year (2012), although the latest date for confirmation was changed (from 7 to 10 days before launch date) to allow other groups slightly more time to obtain cancellations.
- Permits for popular launch dates were reserved quickly after releases, again indicating strong demand for the river during the peak season.
- No fees for reservations or permits, so 2012 offered no additional information about whether such measures would encourage earlier cancellations or reduce multiple permitting.

Suspension of capacities (2013 thru 2019)

In 2013, BLM assumed management of the reservations website; it had some failures with reservations and cancellations, so BLM suspended managing for a capacity. From 2013 through 2019, boaters could use the website to obtain permits but there were no fees and no use limits. Summary use information from the website lacks detail and does not accurately assess use or cancellation rates, although we have collected some findings below. In general, use during peak periods (especially on weekends and holidays) sometimes reached three times higher than prescribed capacities (see discussion below).

Recreation.gov reservation system and recent years (2020 to present)

Starting in 2020, BLM moved its permit reservation system to recreation.gov, the U.S. Government's centralized multi-destination reservation and planning platform. It was first conceived as an information sharing service in 1995; fourteen federal agencies now use the platform to handle reservations at over 2,000 recreation sites. More information about recreation.gov can be found [here](#).

The Covid-19 shutdown occurred during the 2020 season, so data from that year is not representative and was not considered in this study. Preliminary information suggests less than 200 trips were taken that summer. Recreation.gov provides more detailed information from 2021, 2022, and 2023 seasons as discussed below.

The Recreation.gov platform allowed capacities to be enforced, because reservations for permits could be made only online, and the platform would not allow more reservations than available capacities. The rules for applications were similar to those developed for the online BLM system:

- Permit season for overnight use on Segments 1, 2, and 3.
- Rolling releases for 50% of permits four months before launch dates and 50% one month before launch dates.
- Cancellations made available for other boaters to use.
- Commercial and non-commercial trips made reservations in the same combined pool; outfitters could make reservations for their clients.

However, there were a few differences.

- The season was lengthened from May 1 to July 15.
- The platform assessed a \$6 non-refundable reservation fee (mandatory for all recreation.gov reservations or permits, even those ostensibly free). BLM required an additional non-refundable \$20 per trip permit fee, payable when the reservation was made.
- Boaters were required to wait until 14 days before their launch to print their permit, but confirmation was not mandatory.

The Recreation.gov platform tracks reservations and cancellations, and is supposed to track commercial vs. non-commercial trips. It appears there was an issue with the online entry form, making it impossible to differentiate private and commercial trips in most cases.

Recreation.gov cannot track no shows. BLM requests boaters to drop their printed permits into boxes at the launches to help assess no-show rates, but low compliance makes these data unreliable. Anecdotal information suggests that during prime season (May 15 to July 1) no-shows are rare even on weekdays, except during extreme weather or flows. But any no-shows probably mean fewer on-the-river trips than the system reports, and those days are below capacity.

After the initial use of the recreation.gov platform, some outfitters reported difficulties obtaining permits. BLM created ***phase-in permits*** to help them transition to the new system with enforced capacities. The program allows some outfitters to acquire a defined number of permits each year through direct contact with the field office, even if the recreation.gov system shows there are no permits available for that date and segment.

The defined number of phase-in permits for a given outfitter was a percentage of their historic annual overnight trips. Some outfitters had not established a record of such use and received no phase-in permits, while others received one to three per season. The program was intended to sunset (as implied by the phase-in label) with annual reductions as outfitters grew accustomed to the new system. But BLM has not reduced these allowances because outfitters continue to report problems when their clients try to get permits in the recreation.gov system. The program contributes a small percentage of total use (three phase-ins permits in 2022 and six in 2023), and most outfitters with allowances use them only as a backstop in case they are unable to obtain late-cancellation permits through recreation.gov.

Summary of boating recreation use

Data sources and findings

Pre-permit period (before 2011)

- Use information before 1998 is coarse and appears to rely on Oregon Fish and Wildlife estimates. As reported in the 1979 WSR study: about 5,000 user-days of boating (4,000 during spring/early summer and 1,000 in late summer to fall). User-days refer to any user visiting the river for any part of a day (e.g., a day trip with 5 people is 5 user-days; a two-night trip with 5 people is 15 user-days).
- Boating use substantially increased in the 1980s and 1990s, rising from the 1979 estimate of 5,000 user-days to over 13,000 in 1998. This averages about 400 more user-days per year (3 to 8 percent annual increases, depending on the years).
- Self-registration data has been collected on-site since 1998, primarily focused on overnight use on segments 2 and 3.
 - Boaters are supposed to self-register on-site even if they obtained a permit online (beginning in 2011); registrations are to be left at launch kiosk drop-boxes.
 - Rangers collect the registrations and code them in a BLM database.
 - These are the source for non-commercial use data until permits were offered via online reservations systems in 2011.

- Figure 1 shows user-day estimates based on self-registration data from 1998-2008 on segments 2, 3, and combined.
 - Data show continued growth from 1998 to 2008. Total overnight use increased about 50%, an average of 300 more user-days per year; 3 to 5% per year depending on the years.
 - Use increases were not always steady, and some years had lower use. These generally appear related to poor weather or flows in the prime season. For example, the lowest use year (2001), had a small snowpack and summer drought.
 - Increases were concentrated in the prime use season rather than shoulder seasons.

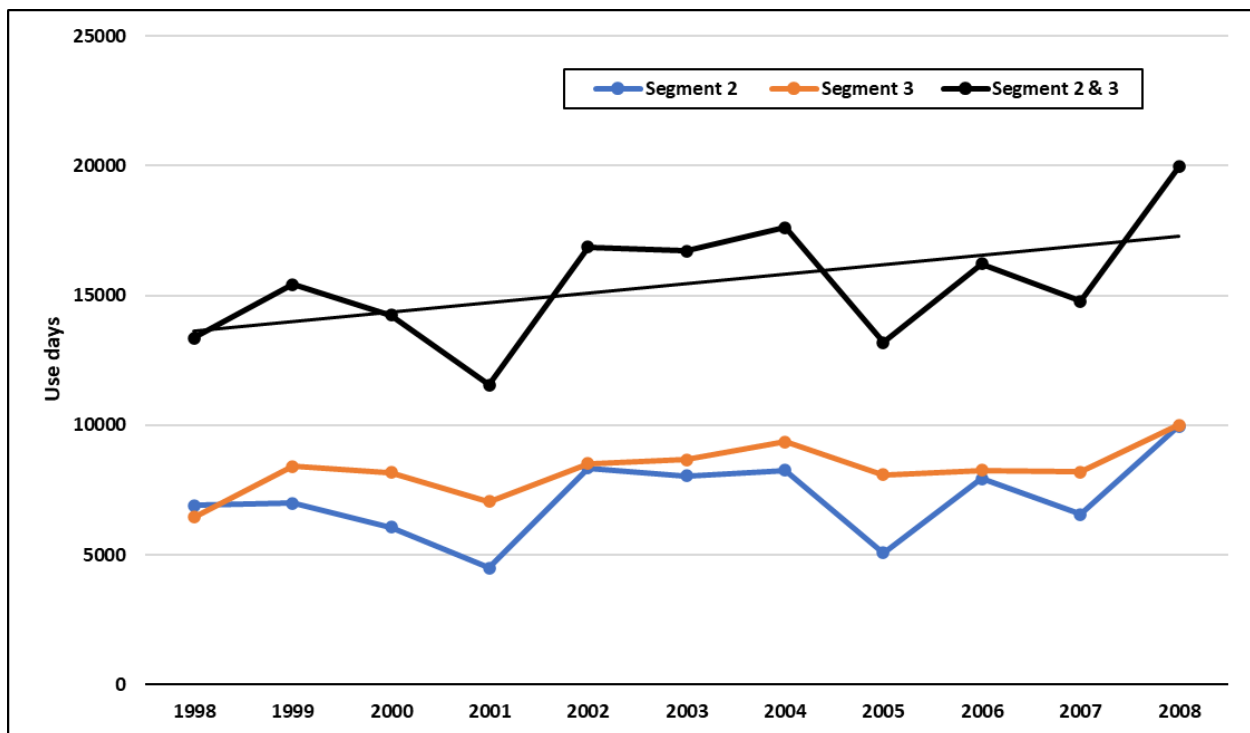


Figure 1. User-days on Segments 2, 3, and together from 1998-2008.

- During this time of increasing use, BLM also documented increased riparian vegetation (due to changes in riparian grazing). There was seven times more willow occupying desirable campsites, improving scenery and other natural values, and providing screening from other camps and/or the river. BLM decided not to develop more campsites by removing this vegetation.

- More boaters competing for fewer campsites resulted in unacceptable social impacts, and this became a focus of the 2006 to 2011 river studies and follow-up EA discussed above. The study identified capacities based on campsite availability in the first fifteen miles below launches, and documented how often capacities were exceeded.
 - Segment 2 exceeded capacity 3 to 9 days per year from 2005 (3) to 2008 (9). Those days were typically 2 to 4 trips over capacity.
 - Segment 3 exceeded capacity 2 to 4 days per year from 2005 (2) to 2008 (4). Those days were typically 4 to 10 trips over capacity.
 - In 2011, 95% of trips appeared to be non-commercial.
- Data from this period included motorized use. In 1998 BLM documented 523 total launches, with 9 (1.7 percent) motorized. Motorized use appears even lower in recent years (see below).
- A 2001 study suggested groups averaged 5.3 people per trip and 2.3 people per boat, so typical trips appear to be 2 to 8 people and 1 to 4 boats.

BLM website period (2011-2019)

After 2011, use information primarily comes from online reservations rather than onsite self-registration. The State of Oregon operated the system in 2011 and 2012, and BLM took it over from 2013 through 2019. Detailed analyses occurred in 2011 and 2012.

- ***Specific findings from 2011*** include:
 - About 2,300 groups received reservations for permits, but only about 800 (35%) confirmed; this is a roughly 65% initial cancellation/non-confirmation rate.
 - About 300 additional trips appeared to no-show (38% of the 800 confirmations). That puts about 500 trips actually on the river, about 21% of the trips making initial reservations.
 - ***Of the 800 confirmations***, 94% were non-commercial and 6% commercial. However, non-commercial trips had a higher no-show rate (about 40%) compared to commercial trips (4%).
 - ***Of the 500 actual trips***, about 456 (91%) were non-commercial and 44 (9%) commercial. Actual total and proportional commercial use was higher because day trips (a substantial portion of commercial use) were not included in this statistic.
 - Cancellation rates were high due to two separate flood events in May 2011 (Service Creek gauge recorded the second and third highest flows on record). Most boaters cancelled original permits and obtained permits for later dates. This was challenging for BLM staff operating the reservation system in its first year, with a high volume of phone calls from boaters looking to re-schedule (even though rescheduling was available online).
 - Over the 52-day limited use season, cancellations led to some permit availability close to launch dates, but a few days were fully reserved with no cancellations. There were 11 sold-out dates on Segment 3A, 2 on Segment 3B, and 4 on Segment 2.
 - Late spring and early summer flows were well above normal, and boating use did not drop off until about July 20th, 10 days after the limited use season ended.

- **Specific findings from 2012** include:
 - There were notably fewer reservations for permits in this second year of the online permit system (decreasing from 2,300 to 1,600), but higher numbers of confirmed trips (963 or 59%). This 41% initial cancellation/ non-confirmation rate was much lower than 65% in 2011, probably due to more typical flows in 2012.
 - BLM did not track no-shows in 2012, so comparisons with 2011 are not possible.
 - Of the 963 overnight reservations validated by confirmations, 51 or 5% were commercial, similar to 2011's 6%. Assuming the same low commercial no-show rate as documented in 2011, the number of overnight commercial trips was notably stable.
 - As in 2011, total commercial use was higher because day trips (a substantial portion of commercial use) were not reported.
- **From 2013 to 2019**, problems with the online platform led BLM to suspend enforcing capacities. Data from these years is less reliable and may not accurately track cancellations. Nonetheless, relevant findings for overnight use in Segments 2 and 3 have been collected for background.
 - Use continued to increase from 2013 to 2019, and data show launches at or above capacity on many days from mid-May to early July.
 - There were noticeable differences between use levels on weekdays and weekends/holidays.
 - Total overnight permits increased 65%, from 758 in 2013 to 1,253 in 2019.
 - Use increases were not linear; 2015 was a low use year similar to 2013, while 2016 to 2019 were all higher but similar (between 1,000 and 1,253).
 - Use estimates from this era may not have included all cancellations, and they did not include no-shows (which were not tracked). Actual use in these years is probably slightly lower than data indicate.
 - From 2013 to 2019 there were only a few motorized trips per year on the entire river, suggesting a decrease compared to 1998.
 - BLM online data did not systematically differentiate between commercial and non-commercial trips, and this has carried over to recreation.gov data (see below). Cross-referencing with outfitter SRP use information was not possible because commercial clients obtaining permits through the BLM system did not have to identify outfitters.
 - We have reasonably good estimates of commercial use during these years (see PUR information below).
 - We considered comparisons between self-registration and online reservation data as a no-show indicator, but observations from BLM staff on a small number of days suggest self-registration compliance is too low to make this meaningful. This is consistent with early recreation studies that often showed trailhead self-registration compliance rates below 20%.

Recreation.gov period

After 2019, BLM switched from their own system to the recreation.gov reservation platform. As discussed in the management section above, this led to changes in reservation and cancellation protocols, capacity enforcement, and fees.

- No-shows remain challenging to track, because online systems record the numbers of reserved and confirmed permits, not on-the-ground trips.
- Data do not differentiate between commercial and private trips. Although the BLM online system had a trip type variable, it was missing for several years, and this continued under the recreation.gov system. Cross-referencing with guide contact information was not possible because most commercial clients use their own account when applying for permits.

With these caveats, overnight use data from Segments 2 and 3 from 2020 – 2023 suggest several findings.

- After capacities were enforced again, use levels stabilized at or below the capacity for each segment, with use more evenly distributed between weekends and weekdays compared to the no-capacity-enforcement era from 2013-2019 (especially on Segment 2).
- Segment 2A (Figure 2) and 2B (Figure 3) consistently have higher permit utilization than upstream segments 3A and 3B.
 - 2022 was the busiest year on Segment 2A, capacity was reached on 26 days out of the 76-day season (34% of days). On another 24 days, there was only one launch remaining.
 - Segment 2A also had 26 days at capacity in 2021 (one launch remaining on 7 days) and 22 days at capacity in 2023 (one launch remaining on 21 days).
 - 2023 was the busiest year on Segment 2B, capacity was reached on 29 days out of the 76-day season (38% of days). On another 22 days, there was only one launch remaining.
 - Segment 2B also had 3 days at capacity in 2021 (one launch remaining on 27 days) and 27 days at capacity in 2022 (one launch remaining on 21 days).

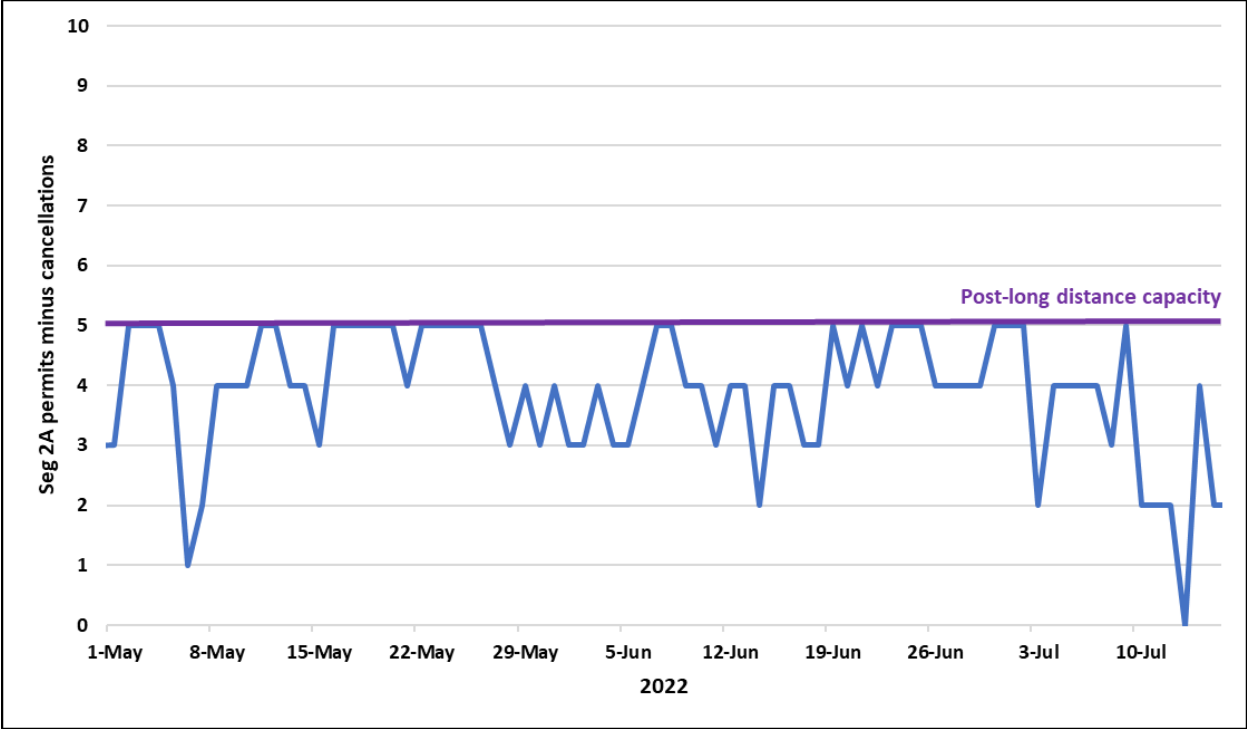


Figure 2. Total permits minus cancellations for Segment 2A in 2022. The purple line = capacity.

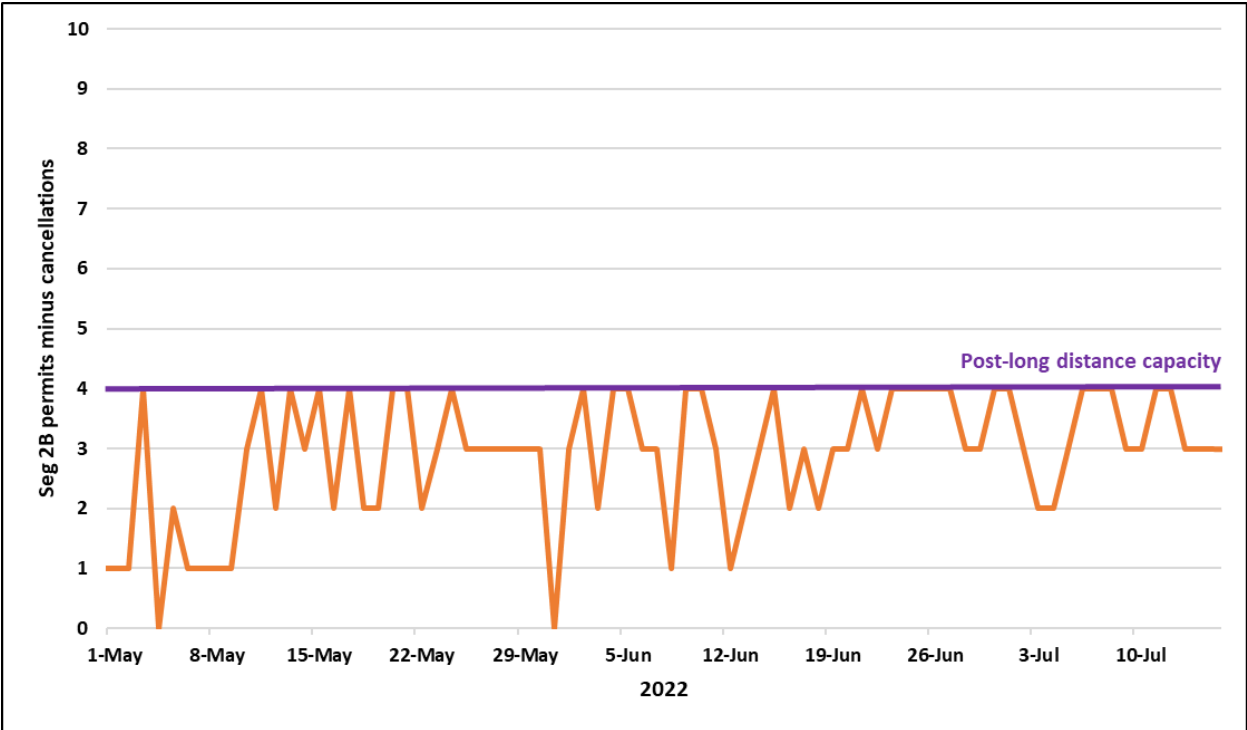


Figure 3. Total permits minus cancellations for Segment 2B in 2022. The purple line = capacity.

- Segment 3A (Figure 4) has lower permit utilization than Segments 2A and 2B.
 - In 2022, permits minus cancellations only reached the capacity on 11 days.
 - In 2021 and 2023, capacities were reached on 11 and 9 days, respectively.
 - Because use on the segment rarely exceeded capacity, it shows a more uneven weekday/weekend pattern.
 - Lower use can occur at any time on this segment, but it is particularly noticeable after June as flows recede. Boaters willing to take low flow trips can nearly always get on this segment after June.

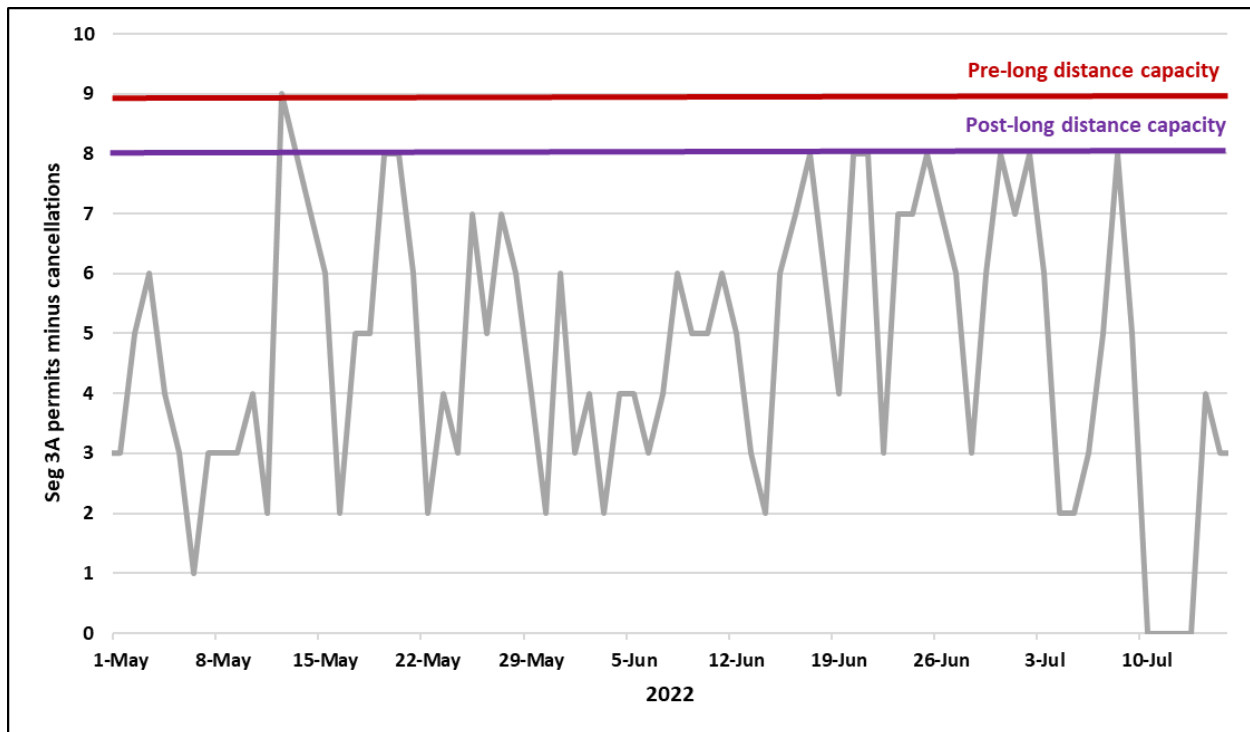


Figure 4. Total permits minus cancellations for Segment 3A in 2022. The purple line = capacity.

- Segment 3B (Figure 5) has the lowest permit utilization of the overnight segments.
 - In 2022, permits minus cancellations only reached the 9-launch limit on three days.
 - In 2021 and 2023, capacities were reached on 8 and 5 days respectively.
 - This segment also shows differences between weekends (peaks) and weekdays (valleys), and this suggests that it has lower use during both early season (before June 15) and after July 1.
 - Lower use can occur at any time on this segment, but it is particularly noticeable after June as flows recede. Boaters willing to take low flow trips can nearly always get on this segment after June.

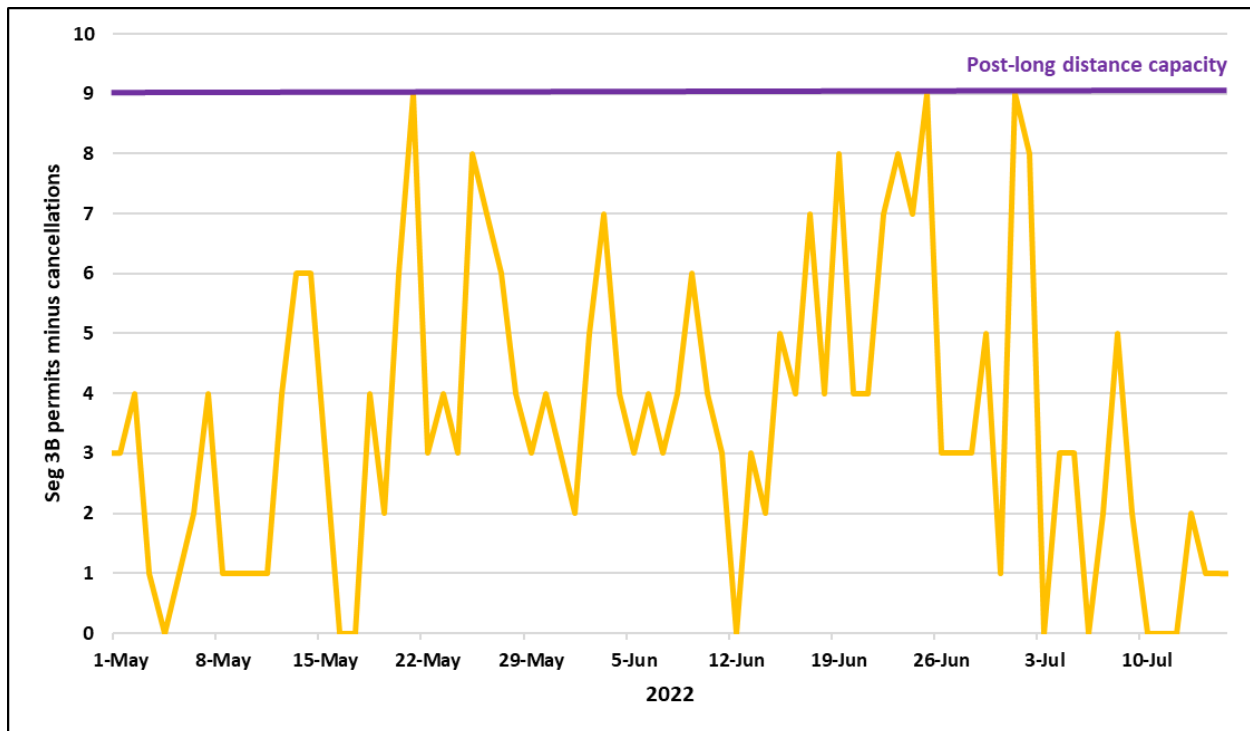


Figure 5. Total permits minus cancellations for Segment 3B in 2022. The orange line = capacity.

- Figure 6 shows overnight trip lengths for 2020-2023. Combined with segment averages, findings suggest the following.
 - Most trips are 2, 3, or 4 nights.
 - Segment 2A trips average five nights, while Segment 2B trips average 4.
 - Segment 3A and 3B trips averaged four nights in 2021, but three in 2022 and 2023.
 - Segment 1 trips are almost all two-day, one-night trips.
 - Most trips on Segments 2 or 3 are 2 to 5 nights, with about 10% six days or more. These longer trips probably include one or more layover days, which may exacerbate campsite competition.

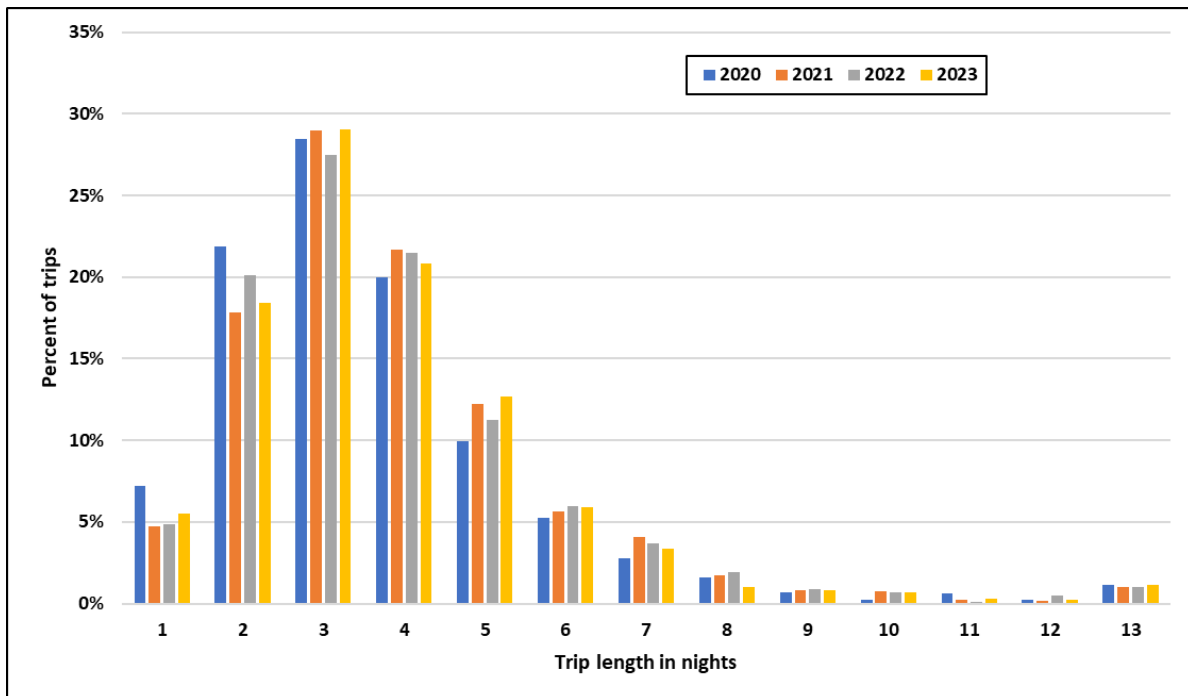


Figure 6. Overnight trip lengths on Segments 1,2, & 3.

- Figure 7 shows the group sizes of overnight trips from 2020-2023. Combined with segment averages, findings suggest the following.
 - The median group size is 7, but averages are 8 to 9 on different segments. About one third of trips have 10 or more people, and about 15 to 23% have the maximum of 16.
 - There is a relatively even distribution of very small (3 or less), small (4 to 6), and medium-sized (7 to 10) groups.
 - During higher use periods when most camps will be used each night, large groups may have problems finding large camps, and they may end up sharing camps or expanding the impacts of small camps. It may be possible to encourage smaller groups to use smaller camps and leave larger camps for larger groups (although this policy has its own challenges). Reducing or limiting the number of large groups is another option.
 - These data are based on permittees’ group size estimates at the time of reservation, often months in advance and possibly rounded up to accommodate a “largest possible” group. It would be good to know actual group sizes at the time of confirmation or launch, but the current system does not track this.

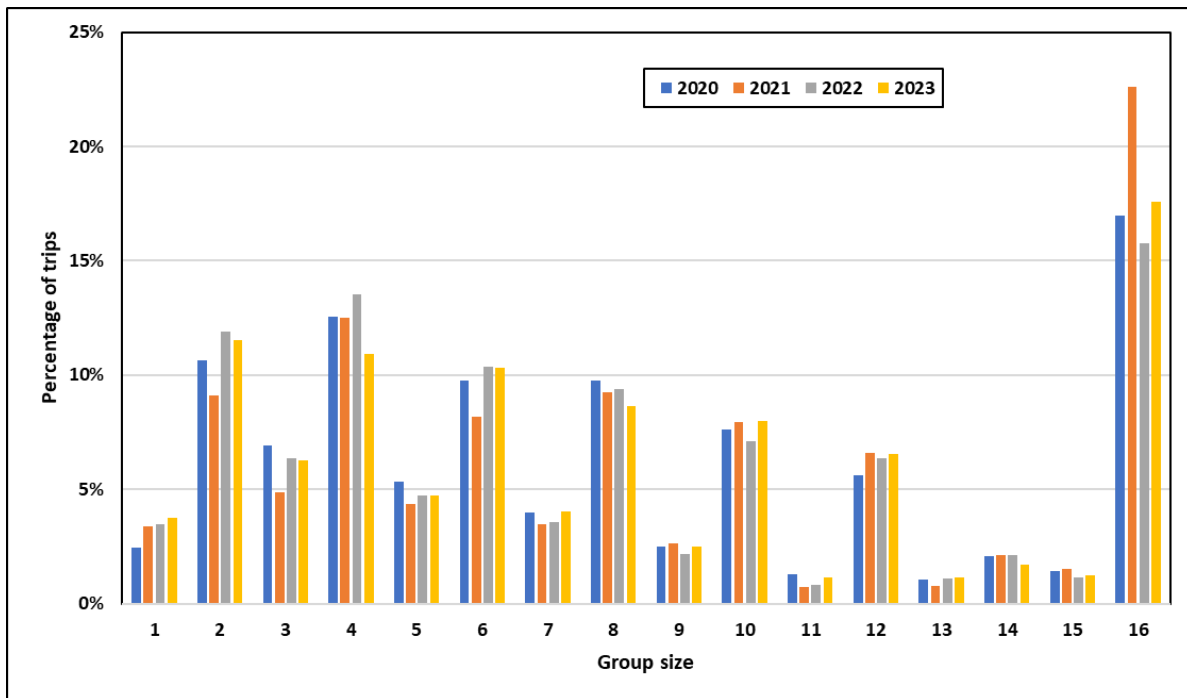


Figure 7. Distribution of overnight trip group sizes on Segments 1, 2, & 3 from 2020 to 2023.

- Sporadic ranger on-site counts in recent years suggest there were few no-shows on weekends and holidays during the peak season (mid-May to the end of June), although during extreme flows or weather no-show rates approach 100% (every trip cancels). On weekdays or during shoulder seasons, typical no-show rates are one to two trips per day at the main launches.
- There is no information about motorized use from 2020 to present.

Commercial use reports

The last source is outfitter Post Use Reports (PURs); BLM annual records by segment as part of SRP stipulations. These are separate from recreation.gov permits, but they provide an accurate reading on commercial use.

Daily data from PURs is not currently digitized, but it is aggregated for all outfitters combined to assess seasonal commercial use. We analyzed information from the six highest-use outfitters' paper files, and counted their overnight trips on Segments 2 and 3 for each year since 2018. Conclusions accounted for lower-use outfitters by applying a corrective factor. Future monitoring could require outfitters to provide this information via recreation.gov as trips are taken, resulting in permit-specific data and more robust analysis options.

With these caveats, we offer the following discussion of PUR information.

- PUR records are from individual outfitters' year-end reports and provide detailed information about each trip. PUR records have been partially digitized since 2013, counting only trips per year by segment.
- PUR records offer no information about non-commercial trips.
- Outfitters must report trip length, entry/exit date and location, number of clients, and number of guides for each trip.
- These data are probably accurate for commercial use numbers, but they do not assess commercial use versus total use because comparable non-commercial data are not available (recreation.gov data illustrates use patterns, does not specifically identify commercial use).
- Outfitter overnight use levels are low, with about one launch every 1 to 3 weeks depending on the segment.
- Before 2020, averages were one launch per week on Seg 2, one launch every 3 weeks on Seg 3A, and five launches every six weeks on Seg 3B.
- A detailed analysis of paper PUR records could result in comprehensive daily data from 2013 to present; this was beyond the scope of this study.
- Confluence conducted a partial PUR analysis to see how commercial use patterns have changed since permits became limited in 2020. That analysis showed a decrease of a few trips per season across all segments since limits were enforced.
- Some outfitters in this partial analysis did not receive any overnight permits after 2020, possibly because they do not have any phase-in permits. Other outfitters have maintained or increased use levels, demonstrating it is possible to get permits from the existing system. It is not clear how these findings are affected by the backstop of phase-in permits, which were available only to outfitters with a documented history of overnight use.

Use vs flow analyses

The short season on the John Day River is due primarily to changes in flow levels. Both high and low flows can be problematic for boaters, and high cancellation rates are possible under either condition. To assess how flows affect use, we analyzed relationships between flows and permit reservations and cancellations (as discussed elsewhere, on-site reservation/no show data are less reliable). We offer the following findings:

- Before 2020, there was a weak correlation between permit numbers and wet/dry year flow data.
- Low flows in mid-summer depress but do not entirely eliminate use. When the flow was below 1,000 cfs by July 1, fewer July permits were reserved. But even in the driest years, a few groups reserved permits in late summer or early fall.
- High flows in early spring depress use. When flows were over 6,000 cfs in early May, there were few permits reserved before May 15, regardless of the year.
- Segment 3A shows the strongest consistent relationship between flow and permits; users on this segment may be the most flow-sensitive.
- Lack of permit availability in the prime flow/weather season may be pushing use into shoulder and off-peak seasons. After 2020 there were more permits in the early and late season despite varying hydrographs.
- 2021 was a dry year. Data show more cancellations (3 to 5 per day on Segment 2) in July than in typical water years.
- 2022 was a high-water year. Data show more cancellations (2 to 9 per day on Segment 2) through the season than in typical water years.
- 2023 showed high permit demand on Segment 2 through the end of the season despite being one of the driest years on record.

Chapter 3. Commercial Use Needs Assessment

BLM is considering revising its allocation system for overnight trips, possibly affecting commercial use numbers, proportions, or other issues. This chapter provides background for such decisions by 1) summarizing past and current commercial use; 2) considering other potential commercial uses; 3) reviewing criteria for assessing commercial use; and 4) drawing conclusions about commercial use needs for the John Day River.

Past and current commercial use

- Commercial use has been available on the John Day since the 1950s. The most common trips are day use fishing on Segments 3 and 4, but several outfitters have offered fishing and backcountry overnight trips on Segments 2 and 3 since the 1980s.
- In the 1990s over 30 outfitters had commercial use permits, in 2024 only 16. Of these 16 outfitters, 11 appear to offer both fishing and rafting trips, 5 only rafting.
- Six outfitters appear to offer overnight trips on Segments 2 and 3, the focus of this report.
- Overall commercial use levels appear relatively steady since 2013 (Figure 8), when BLM began tracking use through its online website or recreation.gov. Data in Figure 8 have been augmented with information from PUR outfitter reports when online information was insufficient.
 - Day use on Segment 3 makes up the bulk of commercial trips, with average of 27 trips during the May 1 to July 15 permit season. The highest was 36 in 2017, lowest was 27 in 2018 and 2021.
 - Segment 2 overnight trips have ranged from 6 to 14 per year, with an average of 10. The highest years were 2017 and 2022; the lowest 2020 and 2021 (probably due to Covid).
 - Segment 3A overnight trips have ranged from 0 to 8 per year, with an average of 3. The highest years were 2014 and 2017; there were no trips in 2013 and 2016, and one each year in 2018 and 2020.
 - Segment 3B overnight trips have ranged from 3 to 13, with an average of 8. The highest years were 2018 and 2021, the lowest 2015 and 2019.
 - Taken together, outfitters appear to average about 21 overnight trips per year (all segments combined). The highest was 28 (2013 and 2017), the lowest was 15 (2015 and Covid-influenced 2020).
 - Differences are small between years when no capacity was enforced (pre-2020) and after recreation.gov enforced capacities (2021-2023). Total overnight commercial trips averaged about 22 per year in both periods (although the Segment 2 average dropped from 11 to 9.5).
 - A few outfitters have had challenges helping their clients compete in the recreation.gov system, and a handful have utilized phase-in permits when they could not obtain a permit through late cancellations.

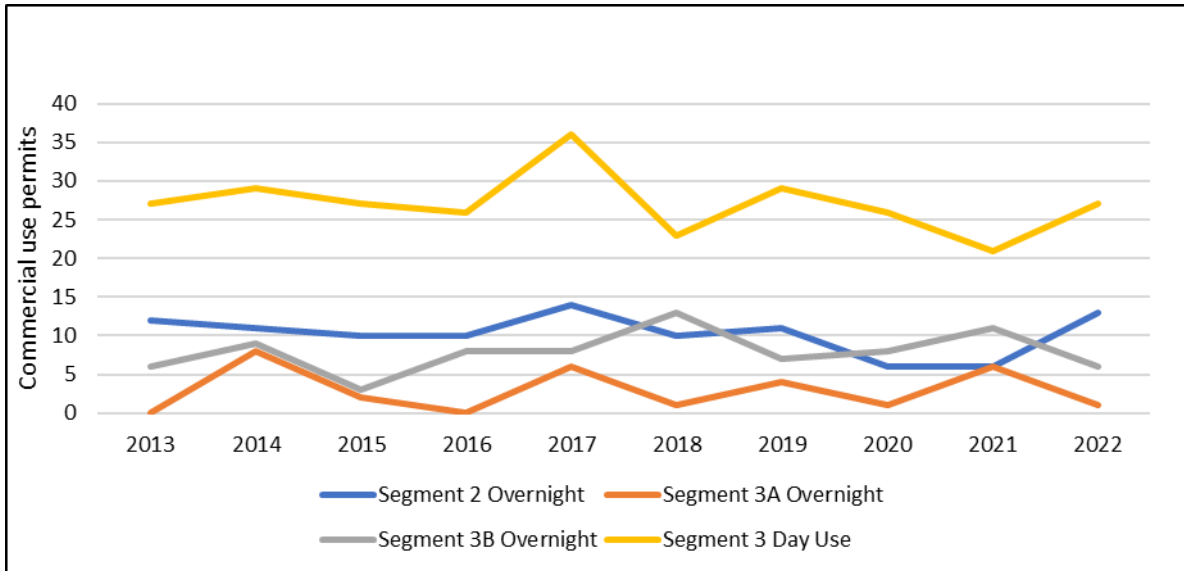


Figure 8. Commercial use trip permits during peak season (May 1-July 15) by type, segment, and year, 2013-2022.

- Commercial use conclusions:
 - Commercial use is low but regular, and roughly steady over the past decade.
 - Commercial use was probably a higher proportion of total use in the past because non-commercial use levels in the 1990s and 2000s were lower. Best estimates suggest commercial use was about 10% of total use in earlier years.
 - Non-commercial use has increased (see discussion above) and commercial use has stayed about the same, so the commercial proportion of use is probably less than 5% in recent years.
 - Some commercial outfitters or their clients report challenges competing for permits in the combined pool, although overall they have received trip permits at about the same rate under varied management regimes since 2013.
 - Commercial customers may have longer planning horizons. They may be less persistent about getting permits on their own, although many have apparently been successful.
 - At least some outfitters would prefer longer planning horizons and more predictability for scheduling trips.
 - The phase-in program implemented when recreation.gov took over reservations has helped a few outfitters, although they have not actually used the program more than a handful of times in the past three years. Outfitters without phase in allowances (those with less history of use) have not had this benefit.
 - Several outfitters continue to request a separate commercial allocation to ensure their sector remains viable.

Potential commercial use

Outfitters and guides currently offer a diversity of commercial boating opportunities on the John Day River. In addition, BLM has considered commercial uses with other specific goals. Outfitters on other rivers in the U.S. have developed some less-standard, targeted commercial recreation opportunities (Klamath outfitters, personal communication, 2021). It is not clear whether these have been motivated by marketing/business development strategies, desire to serve a particular deserving group, or by some identified demand. They may be considered as one-time events by existing outfitters, or as ongoing business models for new outfitters. These include:

- **Outdoor leadership and experiential education trips.** Profit and non-profit organizations (e.g., NOLS, Outward Bound, National Center for Outdoor & Adventure Education (NCOAE)) have for many years offered backcountry courses with outdoor leadership and experiential education goals, some including multi-day boating trips. Similarly, several universities offer outdoor-experience trips with a variety of goals. The John Day River is a good choice for less-experienced boaters because most rapids are easier class I-II, with a few moderately challenging class 3 rapids.
- **Trips where clients operate a boat.** Some outfitters on western rivers (including the John Day) offer trips where clients (with or without previous experience) operate boats, including diverse craft such as inflatable kayaks, SUPs, and rafts. As with the previous category, the John Day is a good choice for less-experienced boaters because most rapids are easier class I-II, with a few moderately challenging class 3 rapids.
- **Trips combining boating with other activities.** Some outfitters combine boating with other outdoor activities such as mountain biking, hiking, or fishing. On the John Day, the accessible mountain/canyon country, seasonal use patterns, and semi-arid climate provide reasonable conditions for combining river running with complementary activities. Weather extremes such as heat/cold, winds, or storms might work against these options.
- **Boating trips for specific populations such as inner-city youth or veterans.** Some outfitters on other rivers offer trips to specific populations, and in some cases, these are counted differently in the context of typical commercial use allocations. BLM could consider something similar for the John Day River, perhaps fitting with national goals for increasing diversity in rural or backcountry recreation settings.
- **Conclusion.** Recreation opportunities can be described as under-represented when there is demand for a particular activity, and a commercial operator is needed to help the public participate. Because the John Day has multiple straight-forward access points and boating on the river is relatively easy, the public has a long history of do-it-yourself trips, and over 90% of river use traditionally has been non-commercial. However, there may be recreation opportunities that existing or new commercial outfitters could facilitate, and BLM could consider these on a case-by-case basis if an outfitter applies to offer these trips. It makes sense to describe the target recreation opportunity, how/why it is not currently represented, and how adding it to the current mix of outfitted services will fit with other goals ranging from business success for outfitters to social desirability of representing particular groups.

Criteria for assessing commercial use

On federal lands, commercial guides and outfitters facilitate recreation opportunities for visitors who are unable or unwilling to take such trips on their own. Several different laws, executive orders, agency policies and regulations, and other guidance apply to commercial guides and outfitters on federal lands. Primary direction for BLM public lands stems from two major laws:

- Federal Land Policy and Management Act (aka FLPMA; 1976; U.S.C. 1701 et seq.)
- Federal Lands Recreation Enhancement Act (aka FLREA; 2004 & 2014; 16 U.S.C. §§6801-6814)

In general, regulations ***require commercial guides and outfitters to obtain a permit*** (usually called a Special Recreation Permit or SRP) to operate on federal lands and return fees associated with those uses. The agency is required to set conditions under which outfitters and guides operate and specify criteria for deciding whether or how much commercial use will be allowed in different locations.

The agency may conduct a formal ***commercial use needs assessment*** or review commercial use programs. Reviews are prompted in situations such as changes to recreation use capacities or allocations, reconciling perceived imbalances between commercial and do-it-yourself/non-commercial use, or streamlining an SRP permitting process. Needs assessments can be at the programmatic level (e.g., deciding whether commercial use is appropriate, or developing criteria for which types of outfitters/guides will receive permits), or they can address allocations of use at specific management units as part of step-down recreation planning.

There does not appear to be a defined format for conducting a commercial use needs assessment for the BLM, but some guidance is suggested in the BLM handbook and can be deduced from general National Environmental Policy Act (NEPA) planning practices. The Forest Service also conducts similar assessments, and its more formalized practices can help inform BLM practices.

In general, ***needs assessments review possible differences between commercial and non-commercial uses and explain how commercial use may serve specified purposes for a given land management unit.*** Issues can include protecting natural, scenic, and cultural resources; promoting health and safety among the visiting public; providing high quality recreation experiences and associated benefits; or providing opportunities for under-represented populations.

The ***outcomes from a needs assessment*** may include defined use levels allocated to outfitted/guided visitors, or a set of criteria for evaluating existing or additional commercial use. At the individual project or location level, a needs assessment may decide 1) ***whether to issue new permits***; 2) ***whether to allow additional use*** for existing outfitters/guides; or 3) ***the specific stipulations*** in existing or new permits to protect experiences or resources.

Steps in the needs assessment process typically include 1) assessing the types of outfitted services that may help meet agency objectives for the area; 2) estimating the total number of people who can use an area during defined times based on resource and setting capability (part of the capacity determination that meets desired conditions and standards); and 3) allocating proportions of the capacity among different sectors of the public (for example, commercial-outfitted, institutional-outfitted, and non-outfitted users).

Needs assessments depend on agency objectives for an area as well as possible impacts from commercial use. The overarching question is whether commercial use adds value to management and use of an area. A needs assessment generally answers the following questions:

- Is commercial use appropriate for the area's laws, regulations, and desired Recreation Opportunity Spectrum (ROS) setting?
- Does commercial use address public safety or health concerns?
- Does commercial use protect environmental resources?
- Does commercial use provide high quality experiences?
- Does commercial use encourage visitor skill building and stewardship?
- Does commercial use provide opportunities for underserved or absent visitors?
- Does commercial use foster small business opportunities and provide local economic benefits?
- Can BLM effectively and efficiently manage commercial recreation use?

The following addresses these questions for the John Day River.

Questions for assessing commercial use on the John Day River

Appropriate for the river's recreation settings?

BLM has traditionally allowed and often encouraged outfitted and guided use on Public Lands, particularly in undeveloped areas that may have few public facilities. Outfitted and guided boating and fishing fall within this broad category of commercial recreation use, and they are common activities on several regional rivers managed by BLM or US Forest Service. Examples include rivers such as the Rogue, North Umpqua, Deschutes, Owyhee, Grande Ronde, White Salmon, Snake through Hells Canyon, Lower Salmon, Main Salmon, and Middle Fork Salmon.

As described above, there is a long history of outfitting and guiding on the John Day River. Much of this use is associated with fishing and may have been present as early as the 1950s, but it has included float-based camping and backcountry trips since the late 1970s.

Existing laws and policies have allowed commercial recreation boating use on the John Day River in the past, and language in existing plans does not suggest the agency, advocacy groups, or the public object to the mere presence of commercial recreation use. The plans recognize possible impacts from recreation use (which includes commercial use) and discuss permitting and stipulations rather than prohibitions.

The most relevant planning documents for the John Day River include 2008 and 2010 Environmental Assessments (EA) on visitor use management, which are step-down plans from the 2000/2001 Environmental Impact Statement (EIS) and River Management Plan developed after Wild and Scenic River designation in 1988. These step-down plans are also consistent with the EIS and ROD associated with the broader Resource Management Plan for the John Day Basin (BLM, 2015).

These plans identify Recreation Opportunity Spectrum (ROS) categories for different segments of the river, plus one designated Wilderness Area, and two Wilderness Study Areas adjacent to the corridor. Discussion in these plans focuses on two overnight boating segments classified Semi-Primitive Non-Motorized (Segment 2 and parts of Segment 3) and Roaded Natural (remaining parts of Segment 3).

These fall in the middle of the recreation opportunity spectrum, (ranging from “primitive to paved”), indicating that BLM will manage for moderate levels of use and development. Some amount of commercial recreation use is generally consistent with these classifications.

BLM plans also identify Desired Future Conditions (DFCs) for Segments 2 and 3; these standards define levels of acceptable impact and form the basis for overnight and day use boating capacities on these reaches (see summary of the 2010 study and EA provided above). There do not appear to be substantial differences between commercial and non-commercial trips; they have similar group sizes, trip lengths, and impacts. If standards defined by DFCs are not being violated, commercial uses that contribute to impacts are less likely to be a specific concern. These plans do not preclude commercial recreation use.

The case for allowing commercial recreation use is implicit in such plans, broadly recognizing that not all members of the public have the equipment, skill, or organizational ability to plan and conduct boating trips on the John Day River. Commercial recreation providers meet such needs by providing boats or camping equipment; operating boats and facilitating activities such as fishing or camping; and taking care of logistics such as scheduling, packing, and shuttles.

Commercial recreation providers may enhance client experiences by providing interpretation of the river’s natural and human history or by teaching outdoor skills. Marketing materials for several outfitters suggest their guides have special or local knowledge about the river, fishing or other resources, and ways to experience its best features. For agencies focused on minimizing impacts and modeling good recreation behavior, outfitters and guides also may play useful roles in teaching stewardship ethics and skills to their clients. Due to their regular use of the river, outfitters and guides may offer useful perspectives on changes or impacts over time (to clients or the agency).

None of the forgoing indicates that the John Day River *requires* commercial recreation use to be available to the public. The river has easier whitewater (Class II-III), trip lengths are short (day trips plus 3- to 5-day overnight trips), and access is straightforward. Many people have the skills and organizational resources to plan and conduct do-it-yourself trips, either independently or with use of commercial recreation services such as boat rentals or shuttles. However, some users find the equipment, services, and expertise of commercial providers necessary or desirable, although historically this appears to be less than 10% of total use.

Conclusion: Commercial use is not required for public use of the John Day, but traditionally it has been present in the basin, and it has generally been allowed in the region in similar types of undeveloped recreation settings.

Address public safety and health?

BLM offers permits for outfitters and guides who have equipment and experience for successfully running the John Day River. Permit stipulations require commercial providers to have equipment in good repair; swiftwater and first aid / Wilderness First Responder training and equipment; and insurance to cover financial liability. Although the John Day River is generally not difficult, it does offer challenges during extreme flows or weather, and parts of the canyon are remote.

The presence of outfitters / guides on the river is unlikely to reduce public health and safety; the above stipulations ensure equipment and skills for taking commercial visitors down the river. In rare instances of mishaps such as pinned boats or the need for medical attention for commercial or non-commercial trips, the presence of outfitter / guide equipment, experience, and expertise may help resolving the situation. However, the small commercial proportion of use on the John Day suggests public safety benefits may be small.

Conclusion: Outfitters and guides are likely to moderately improve on-river resources for handling relatively rare public health and safety issues. Commercial recreation use is not necessary to provide for public health and safety, but it is unlikely to increase such risks.

Protect environmental resources?

All recreation use has some impacts; the management challenge is ensuring that impact levels do not exceed acceptable levels defined by standards. Capacities (use limits) have been established on the John Day River to protect natural, scenic, experiential, and cultural resources, and commercial use at historical levels is unlikely to cause unacceptable impacts.

Appropriate recreation behaviors can help protect high quality recreation resources, and they are at the heart of Leave No Trace (LNT) principles. Examples on the John Day include human waste carry-out; use of designated campsites; cleaning camps of litter; bring-your-own firewood; and catch-and-release fishing.

Special use commercial recreation permits typically include stipulations requiring LNT practices. Guides and outfitters are primarily responsible for ensuring their clients observe LNT practices. They may also model or encourage such behaviors among other users, an element of stewardship (discussed below)

Violations of LNT practices can be penalized, and egregious problems may result in permit suspension or loss. BLM conducts an annual meeting among outfitters and guides to identify emerging problems and describe areas of LNT emphasis; they have occasionally discussed problems with individual outfitters and guides. No outfitter or guide has had a permit revoked for LNT violations in recent years.

Conclusion: The existing low level of commercial use is unlikely to have noticeable impacts on natural, experiential, or cultural resources. Stipulations encourage LNT practices that are widely used.

Provide high quality recreation experiences?

The John Day River setting provides outstanding opportunities for high quality trips, as documented in a 1979 Wild and Scenic study report and discussed in later plans. The river is scenic, has excellent trout and bass fisheries, mild but fun whitewater, and fine canyon camping. Although it has seen increasing use in the past four decades, widespread LNT practices among users, in combination with on-river management (including capacities on overnight segments) have kept the canyon in good physical condition, with few signs of use impacts (e.g., human waste, litter, or cut trees). While campsite competition and launch congestion remain problems during peak use periods, there is little evidence of substantial discontent about the quality of trips. Several outfitters report return business, and some express interest in growing their use.

As a small proportion of total use on the John Day River, commercial use probably has little positive or negative overall impact. However, outfitters and guides have opportunities to enrich appreciation of the area among their clients by immersing them in the environment, improving outdoor skills, or interpreting natural and cultural history. Many outfitters and guides recognize the value they can bring to client experiences, and success of outfitting businesses complements and supports BLM goals to provide high-quality experiences.

Conclusion: Outfitters and guides help provide quality recreation experiences on the river. They are likely to enhance their clients' experiences by teaching outdoor skills and interpreting the area. They are unlikely to unduly diminish non-commercial users' experiences because they are a small proportion of total use, and they keep their own impacts low through stipulated LNT practices.

Encourage skill building and stewardship?

Trips on the John Day River provide opportunities for visitors to learn about central Oregon natural and cultural history, and participate in enriching outdoor activities like boating, camping, swimming, and fishing. Most John Day visitors already have skills and equipment to conduct these trips on their own.

Some choose outfitted trips to develop their outdoor skills and knowledge. In these cases, outfitters and guides have terrific opportunities to teach receptive visitors responsible river use. This probably begins with modeling appropriate outdoor behaviors and ethics but can include more structured learning programs. From etiquette at launch ramps to low-impact camping and safely navigating rapids, outfitters and guides have often developed efficient and pro-environment techniques that can improve skills and norms among their clients.

But not all commercial trips emphasize outdoor skills or interpretation. In such situations, outfitters and guides serve more as facilitators – ensuring client safety, comfort, stress-free experiences – and the stewardship goal is subsidiary. Outfitters and guides may also influence stewardship through direct clean-up projects. This may be limited to camps used on their own trips, but they could extend to special clean-up trips or BLM-led projects to build or maintain launch areas, camps, or trails.

Conclusion: Outfitters and guides help improve stewardship on the river, primarily through skills and knowledge imparted to interested clients on commercial trips (a small proportion of total use). Outfitters and guides may also model stewardship behavior for other users or participate in direct clean-up or other stewardship activities.

Opportunities for underrepresented or absent visitors?

Some rivers have provided additional allocations or reduced user fees to organizations offering trips for specified populations such as military veterans and inner-city youth, or trips with educational, scientific, or stewardship goals. Cooperators include schools, colleges, or LNT-oriented groups like NOLS, WEA, Outward Bound, or conservation groups). The idea is to reduce barriers to use, especially if such groups are otherwise disadvantaged in competing for allocations.

It is unclear if the John Day River has substantial demand from traditional underrepresented groups such as youth or veterans, given that the river is relatively far from urban areas in Portland or Eugene. It is perhaps a better candidate for stewardship/education-focused trips because 1) it is a good place for learning basic moving water skills; 2) trip lengths are short but could be extended for teaching opportunities; and 3) the canyon has interesting geologic and other scientific phenomena.

It is also unclear if such groups currently have problems obtaining permits. The current system allows them to compete with private and commercial trips for reservations, although some organizations may be unsure whether they qualify for SRPs or special exceptions. BLM could encourage such use by specifically identifying the kinds of educational/stewardship groups being sought, then establishing a small allocation for them. BLM should ensure that new uses are not attracted during peak use periods (when demand already exceeds supply), and overall use should not exceed capacities.

Conclusion: The current commercial SRP program does not specifically encourage use by underrepresented populations or groups focused on educational/stewardship teaching. If BLM wanted to encourage more use by such groups, streamlined permitting or separate allocations may help.

Fostering small businesses and providing local economic benefits?

Many rivers are located in rural areas with less diverse economies; commercial recreation can help support local economies by providing seasonal employment or encouraging local purchases. Of the roughly twenty outfitter or guiding businesses operating on the John Day, the majority are small businesses and over half are local (central Oregon; focused on the John Day or nearby Deschutes); others operate statewide or in other states. It is unknown whether these companies hire locally or from a wider geographic region (including Portland, the Willamette Valley, or greater Bend area). The short prime boating season (May through early July), and low commercial use levels also limit the economic impact of these companies.

Guidelines also consider whether outfitting businesses generate sufficient income to provide quality services over time. The stability of John Day commercial use suggests that such businesses are profitable. On the other hand, the number of outfitters has declined from over 30 in the 1980s to about 20 in recent years. Explanations might include decreasing revenues, increasing proportions of the public able to run their own trips, consolidation among outfitters, declining interest in fishing-based trips, or aging demographics.

Conclusion: Outfitters and guides in the region contribute to a more diverse economy, but their impact is likely to be small given the short season and low commercial use levels. The stability of commercial use suggests that even though outfitted use is low, several outfitters have been successful providing quality trips at current levels of demand.

Can BLM efficiently manage commercial recreation use?

When assessing commercial use, BLM considers the resources required to manage such use. The current John Day reservation system allocates commercial and non-commercial uses through the same combined pool, so BLM does not direct substantial management resources towards commercial issues. SRPs are processed for each outfitter to ensure adequate equipment, skills, and insurance, and there is an annual meeting to discuss LNT issues and use reporting. The relatively low use and number of outfitters further reduces the management burden.

Conclusion: BLM effort managing commercial use is not a heavy burden, because commercial trips are allocated through the same reservation system as the non-commercial sector, and the proportion of commercial use and numbers of outfitters are small.

Conclusions from the Commercial Needs Assessment

Taken together, the previous discussion suggests the following conclusions about commercial needs on the John Day River:

- The John Day is a river with moderate whitewater and logistical difficulty, where relatively inexperienced boaters can organize and conduct their own trips.
- Many non-commercial trips use some commercial services such as shuttles or gear rentals.
- Full-service outfitted and guided trips have been present on the John Day River for many years, with a regular but low percentage of use (generally less than 10 percent).
- Existing commercial recreation use is compatible with the river's Semi-Primitive and Roded Natural recreation opportunities. Commercial trips appear like non-commercial trips in terms of group size, trip length, types of use, and impacts. With SRP stipulations, commercial use is unlikely to have substantial negative impacts.
- Commercial use may benefit overall river stewardship or public safety, chiefly through modeling by experienced guides on commercial trips. However, the low level of commercial use suggests these impacts would be modest.
- Similarly, commercial use may help diversify the local economy because many companies are from central Oregon, but the short season and low level of commercial use limit this positive impact.
- Commercial use is being earned (through the combined pool reservation program) at similar levels to the past when use was unlimited. This suggests there is a small but consistent population of users interested in commercial trips, providing ample reason to allow such use to continue.
- New and possibly beneficial commercial uses could include outdoor leadership and experiential education trips, trips where clients operate a boat, trips combining boating with other activities, or trips offered to underrepresented populations. However, these would probably make up a small proportion of the already-small commercial sector.
- BLM has regulations and protocols in place for managing the current levels of commercial use. Improvements to allocation systems and reporting practices could help automate or increase the efficiency of BLM's management efforts.

Chapter 4. Allocation Definitions, Issues, and Levers

This chapter begins with terms and definitions for readers unfamiliar with the allocation and capacity literature. It then reviews a list of allocation issues for the John Day, based on the concerns boaters or outfitters have identified for the existing system. Finally, it reviews the management variables or **levers** BLM can adjust to address these issues.

Chapter 5 follows with a description of the existing system – the No Action Alternative – and develops three reasonable alternatives that employ management levers to achieve different objectives. This chapter also includes a set of adjustments, efficiencies, and incentives (AE&Is) that would improve the existing allocation system and could be used with any alternative (designated common to all alternatives).

Terms and definitions

Carrying Capacity is the level of use beyond which impacts exceed standards; it defines how much use is too much. In general, capacities are set to ensure that standards are not exceeded for the most sensitive impact. For overnight trips on the John Day, the capacities are primarily defined by standards for campsite occupancy (ensuring that boaters have reasonable opportunities to avoid camp sharing, camp competition, encounters, and sharing).

Allocation refers to the system that distributes limited use under a capacity. If capacities decide the size of the pie, allocation decides who gets the pieces and how.

Split allocation develops different systems for distributing use to the commercial (trips organized by outfitters and guides) and non-commercial (do-it-yourself or private) sectors.

Common pool allocates use to individuals or groups without distinguishing whether they intend to take a commercial or non-commercial trip (none of the use is allocated specifically to outfitters).

Adjusting split allocation approach assumes an initial split system based on historical use patterns and is adjusted to accommodate changing user demands.

Commercial use refers to trips where users pay an outfitter for equipment, services, and expertise when taking a trip down a river. It is distinguished from non-commercial use primarily by the presence of guides or other paid staff on the trip. It doesn't include trips where people rent equipment or pay for services such as shuttles or food packing, without taking guides (sometimes described as semi-commercial, outfitted use, or livery services; see non-commercial use below).

Non-commercial use refers to trips without guides, where users share costs and chores. Non-commercial users may rent boats or other equipment, pay for shuttles or food packing, or otherwise receive help in organizing their trip, but they are not accompanied by guides. Non-commercial trips are also commonly known as private or do-it-yourself trips.

Outfitted use is sometimes used to identify non-commercial trips using rental equipment. Equipment-only outfitters do not control an allocation of use like full-service outfitters under split systems. Some livery services on some rivers have Special Use Permit contracts.

Outfitters own or operate a commercial company (either full service or equipment-only); **guides** refer to staff who operate individual trips (which may include baggage boat operators, including swampers, cooks, or others who facilitate and generally accompany the trip on-site).

Commercial passengers refer to the people that take commercial trips; some outfitters or guides refer to them as clients or guests.

Administrative use refers to several types of trips that may occur outside of the commercial and non-commercial sector. Common administrative trips include ranger patrols, planning and monitoring trips, research trips, and VIP show-me trips (e.g., for congressional representatives or agency officials). Administrative use sometimes includes educational or special group trips that are not counted as part of the commercial or non-commercial sectors.

Special exception use refers to groups from under-represented populations such as military veterans and inner-city youth, or trips with educational, scientific, or stewardship goals. Cooperators may include schools, colleges, or LNT-oriented groups like NOLS, WEA, Outward Bound, or conservation organizations).

Efficiency refers to the ability of an allocation system to utilize all the permits available under a defined capacity. Cancellations and no-shows that cannot be used by others works against efficiency.

Issues

Planning horizons

The time between when a person **plans** a trip and then **actually goes** is called their **planning horizon**. Planning horizons vary; some people require definite schedules far in advance, while others are more spontaneous or flexible. Planning horizons can be different for different types of trips (e.g., shorter vs. longer), or different life circumstances (e.g., job or family commitments). In general, planning horizons for a specific trip are likely to vary by perceived complexity of trip logistics, distance from the destination, and level of structure in a person's life.

Outfitters have suggested their clients generally have longer planning horizons and less schedule flexibility than people on non-commercial trips, perhaps because some commercial clients travel farther distances with other travel arrangements to be aligned. Some John Day outfitters report their clients are interested in reserving a trip for the next year as soon as they get off the river, which is not possible because the current rolling reservation system is not available until four months before a launch date. Based on outfitter comments, a six-to-nine-month planning horizon would be best, although some reported they can plan trips with a two-to-three-month horizon. Because agencies mostly have contact with outfitters and not their clients, it can be hard to distinguish between outfitter and client preferences.

We know less about non-commercial boaters' planning horizons, although many have demonstrated logistical flexibility. There are some who use permits from longer horizons (the existing four-month reservations block), while others take advantage of trip cancellations and use permits within a few days or a week before launches. We've heard some outfitters suggest that non-commercial groups are likely to be local and perhaps from age or occupational demographics that allow more flexibility, although we do not know of any data that assesses this generalization.

Outfitters and the BLM have also suggested that some non-commercial groups make long-term plans and even obtain multiple permits, then wait until flow and weather conditions become apparent before deciding which to use. If it occurs, this **multiple permit speculation** takes spaces from true long-horizon planners. Improvements that provide cancellations or other short-horizon permits may discourage competing for long-horizon permits people do not really need. There are no data to assess this generalization.

Many rivers hold lotteries or allow reservations just after the new year (Jan/Feb). This may have more to do with agency administrative convenience in the non-digital era when many systems were devised (1970s and 80s), which eventually became a cultural calendar for permit seekers. While a Grand Canyon or similarly long trip may require longer planning horizons, they make less sense for the John Day where trips are shorter and extreme flows or weather can lead to cancellations. Absent any constraints from a permit system, we suspect many non-commercial boaters' planning horizons might be two to four weeks, although again there are no data to assess this.

In conclusion, a permit system that accommodates longer **and** shorter planning horizons seems preferable.

Uneven internet access

When there is competition for limited online reservations, the person who first submits the permit application on the Recreation.gov platform will win the permit. With a rolling reservation system there should be a random element to who wins these reservations each day, but some claim that faster internet connection speeds are advantageous. We've also heard that some applicants employ bots or AI to frequently refresh the webpage on their browser at times when reservations may become available.

If true, the recreation.gov platform could systematically favor some applicants to the detriment of those in rural areas or with less sophisticated internet infrastructure. A lottery (allowing anyone to enter before a deadline) gives every applicant an equal chance of winning no matter their geographic location or internet situation.

Commercial / non-commercial splits with uncertain use data

Some outfitters have requested a split pool because they believe non-commercial boaters outcompete their clients for reservations. Split pool systems separate the two types of boaters, so outfitters compete only against each other (leaving their clients out of the equation). One can tailor the permit system to meet each group's needs, and competition is among people with similar characteristics.

However, split pools are typically less flexible, and do not let outfitters grow their businesses past the size of the initial allocation. If outfitters attract more clients for the next year, their set allocation might prevent them from winning more permits to meet that level. Conversely, if outfitters do not use their full allocation in any given year, there is no mechanism for those spaces to be used by non-commercial boaters.

Some outfitters have requested their own individual allocation within the commercial split. Individual allocations assign permits to a specific business, making those permits a valuable resource that can be sold to other outfitters, essentially creating private ownership of a public resource (space on the river). Individual allocations are beyond the scope of this report.

Establishing a split allocation requires high-quality data because decisions about the percentages in the split typically last for many years. The current John Day permit system collects reasonably accurate data on commercial trips because numbers of trips are small, cancellation/no-show rates are low, and detailed reporting is part of operating requirements and fee determination. But non-commercial trip data are considerably less reliable because numbers of trips are large, cancellation/no-show rates are more variable and higher, and data reporting/handling are less clear all around (reasons discussed elsewhere in this chapter).

Allocation decisions required for a split allocation system should be made with full understanding of both commercial and non-commercial use. If data is unavailable or imperfect, it makes sense to precede major allocation decisions with accurate monitoring. On the John Day, commercial use levels may be suppressed because applications for new permits have not been allowed for a decade, and permit reservation platforms have had challenges (particularly from 2013-19). Private use numbers are also challenging for a variety of reasons, as discussed above. A monitoring period with better data collection would provide more accurate information about both sectors.

Timely cancellations

Historical records, anecdotal information, and occasional ranger counts at launches indicate that the John Day has unusually high and variable cancellation rates. The average cancellation rate is estimated at around 40%, and it varies from 100% (during extreme weather or flows) to 0% (on peak holiday weekends). As discussed elsewhere in this report, the John Day's short season and highly variable weather/flow conditions all contribute.

In the current system, permit holders cannot print their permit until two weeks before the launch date but are not penalized (auto-cancelled) if they fail to print their permit. No additional fee is due at that time, and there are no fee refunds for cancellations, so there are no financial incentives to cancel reservations that will not be used. These policies incentivize last-minute cancellations (or even no-shows as discussed below). Bottom line: even when cancellations occur, they are difficult for others to use unless they can organize a trip on one-or-two days' notice.

Effective permit systems encourage early cancellations through confirmation fees, refunds, or no-show penalties. For example, the Rogue River system penalizes no-shows with a one-year permit ban (the so called "bad boaters list"). The John Day has a two-year permit ban that is not enforced because BLM acknowledges poor compliance with self-registration. An improved system would enforce the permit ban.

Multiple permit reservations

With uncertain weather and flow conditions, far-in-advance permit applications, and little financial penalty, there are incentives for non-commercial groups to reserve more than one permit (obtain speculative multiple permits). This allows choosing the date with the best conditions, although there are no data to evaluate this situation. If true, it encourages holding permits and works against timely availability of permits that will not be used (as discussed above for cancellations).

The John Day has no specific policy prohibiting this practice. Effective permit systems discourage multiple permit speculation through mechanisms such as fees, refunds, or bad boater lists.

Fees

Permit fees need to be expensive enough to discourage speculative applications, but not so expensive to become barriers to entry. Total costs for overnight boating trips on the John Day probably range from hundreds to thousands of dollars, depending on trip length and group size. Necessary boats and camping equipment are also expensive.

For short trips on similar rivers like the Deschutes, a 3-day, 10-person trip costs \$180 in permit fees (\$6 per person, per day). Although such fees are small relative to other expenses (food, gas, shuttles, equipment), they appear high enough to discourage speculative permits.

A John Day reservation currently costs much less, \$26 for any group size/trip length. The fee is due at the time of reservation, there is no confirmation fee, and no refunds. Changes such as larger overall fees, some fees due at confirmation, and some kinds of refunds would discourage speculative bookings, no-shows, and encourage timely cancellations. Any fee changes will need to be processed through an approved business plan which is outside the scope of this study.

Boater rosters

Sometime before launch (typically at confirmation), many rivers require permit holders to list all trip members and provide information such as full name, address, birth date, and driver's license number. These help with personal accountability and contribute to accurate information about visitors. Trip roster analysis could also help with violations and penalties.

Improving efficiency by discouraging late cancellations and no-shows

Late cancellations and no-shows produce inefficient utilization, especially in high-demand situations. They occur when combinations of incentives/disincentives (as described above) encourage reasonable people to act in ways that benefit them but produce adverse collective costs. Systems need to be designed to 1) encourage timely availability of permits that will not be used (efficiency), and 2) accurately collect data about how the system is working (to identify successes *and* areas for improvement).

No-shows not reported in recreation.gov or BLM data

Historic average no-show rates from enhanced monitoring periods are about 40%. On-site counts made by rangers indicate that contemporary no-show rates can vary between 0% and 100% depending on the date, weather, and flow conditions. Lack of consistent on-site monitoring and poor compliance with on-site self-registration mean that no-shows are not represented in the data from recreation.gov. Similarly, BLM use data from 2011-2019 also does not accurately count or estimate no-shows. These findings indicate a possible disparity between permit data and the number of actual trips on the river.

Issue conclusion

Lack of good information about private trips and no-shows are substantial problems with the current permit system. Accurate data about numbers of trips launching on each segment on each day of the season is necessary to enforce permit regulations and make good management decisions, and reporting should be streamlined to facilitate review and analysis. Many of the actions discussed in the alternatives section could improve monitoring and data quality, in addition to other functions such as incentivizing cancellations, discouraging multiple permits, and decreasing no-shows.

Management action levers

This section reviews adjustments that might be considered for the John Day permit system; in most cases they are actions used on other rivers. Although limitations in the recreation.gov framework may create implementation challenges, that platform is continually improving and this list could benefit future river managers by providing more choices. The purpose of this section is to stimulate thought about possible decisions and consequences for different user groups.

Allocation approach – combined vs. split pools

The first major decision when designing a permit system is choosing between separate or combined allocations for commercial and non-commercial use. A general description of the approaches is provided below, along with lists of advantages, disadvantages, or other outcomes. A complete discussion is beyond the scope of the present document but can be found in Whittaker and Shelby (2008).

Combined pool systems allow outfitted and private trips to compete for the same pool of limited permits, and the proportion of outfitted or private trips can vary over time as boaters in the two sectors utilize permits. This approach is currently used on the Deschutes and John Day rivers.

- Responds to and automatically adjusts for changes in demand for non-commercial or commercial sectors.
- Provides data showing demand in each sector.
- Easier to administer because BLM does not need to change allocations between private and commercial sectors, or among individual outfitters.
- Provides opportunities for outfitter growth; if more visitors seek commercial trips, they can reserve dates and contract with outfitters.
- New outfitters or those offering new types of trips can compete for permits.

- SRPs certify outfitters to operate, but do not guarantee access.
- Eliminates *de facto* ownership of access rights or commercial permits; avoids transferring a public resource (access to the river) to private entities (outfitting businesses).
- Creates market-based incentives among outfitters, who need to provide high quality trips to compete for successful permit applicants (with other outfitters, or versus self-outfitting).
- May encourage diversity of trip options, lower trip costs, or reinvestment, which are benefits for commercial customers.
- May reduce profit for outfitters, which may affect services, capital investments, or trip offerings.
- May limit access for spontaneous commercial passengers because permit system requires planning ahead.
- May work better for people that can plan ahead and understand the intricacies of the permit process.

Split allocation systems create separate pools for different uses, usually divided between outfitted/guided boaters and do-it-yourself/private boaters, sometimes with additional allocations for educational or service groups. These systems are found on many multi-day rivers in the western U.S.

- A set proportion of permits in the commercial pool are reserved for outfitters.
- Typically each outfitter gets a specified number of permits (launches, people, user-days, etc.).
- Outfitters do not have access to permits outside their pool, and the outfitted sector and individual businesses cannot increase or decrease.
- Outfitters only compete with each other for clients.
- Historically-based splits are based on actual demand at that particular time, so there is no bias toward either sector when first implemented.
- No data to accurately track changing demand in either sector, so there is no mechanism to adjust percentages.
- Because outfitters receive a block of access, it may simplify logistics, labor, and equipment.
- May provide more certainty about the pattern of trip types launching each day.
- Guaranteed access and simpler procedures for commercial passengers (who allow outfitters to make all the permitting arrangements).
- Transfers a public resource (access to the river) to private entities (outfitting businesses). Initial outfitters can capture the monetary value of access by selling their permits through outfitter-to-passenger transactions (after receiving initial allocations at little or no cost through non-market mechanisms).
- Gives *de facto* control of public access to outfitters, who sell access to commercial passengers above and beyond the cost of other services.
- Outfitters sell access rights when outfitting companies are sold (and permits are transferred).
- Creates a quasi-monopoly among outfitters.

- Creates separate and possibly unequal allocation systems. Commercial users compete for space on trips through pricing and reservation mechanisms. Non-commercial users compete through various (generally non-market) mechanisms such as lotteries or reservations.
- Allows managing agency to develop and administer different rationing systems within different sectors (e.g., differently phased releases for the commercial and non-commercial pools).
- Based on historical use on the John Day, commercial outfitters have earned only one launch every few days on the three overnight segments collectively.

Permit release date

This decision affects the proportion of permits available during different times in advance of launch dates. Permit releases can be made on a **fixed** or **rolling** basis. A **fixed release** makes all permits available on a single date, or proportions of permits available on some number of specified dates). A **rolling release** makes permits (or a percent of permits) available a defined period ahead of each launch date. Currently the John Day River uses a rolling system that releases 50% of permits for a given day four months ahead of the launch date with 50% released one month ahead.

Fixed release. A limited number of fixed releases (e.g., 25% on April 1, 25% on May 1, and 50% on June 1) could distribute all initial permits to accommodate different planning horizons, while minimizing the daily operational burden of a rolling system. There would be a smaller number of permit windows, and each one would probably be more competitive.

Number of rolling release dates. The current system has two release dates (four months and one month) and requires no modification to recreation.gov. A system with more release dates could accommodate more diverse planning horizons, with more times to obtain a permit. There may be limits to the ability of recreation.gov software to increase the number of release dates.

Rolling release with higher proportion of early dates. This system would favor applicants with longer planning horizons (e.g., 25% at six months; 50% at four months; and 25% at one month). More availability among early dates may encourage multiple or speculative reservations among groups who want to maximize their chances of taking a trip when flows or weather are best (and they relinquish or cancel other permits on other dates – possibly too late for others to use).

Rolling release with higher proportion of late dates. This system would favor applicants with shorter planning horizons (e.g., 25% at four months; 50% at one month; and 25% at two weeks). This would discourage multiple or speculative reservations, and is likely to include fewer reservations that are subject to cancellations due to weather or flows, but might be challenging for some boaters who cannot organize a trip on short notice.

Mixed fixed and rolling release. It is possible to have a mix of rolling and fixed dates. For example, maybe a single release for early trips (say 25% of launches in the prime months) in March. Then rolling releases for 50% one month out, and for the last 25% two weeks out.

Type of initial distribution

Research suggests people prefer reservations, especially when demand doesn't greatly exceed supply (Shelby et al., 1989; Whittaker and Shelby, 2007). But some prefer lotteries for fairness reasons. For example, in the highly competitive and sometimes disputed Grand Canyon system, weighted lotteries have been chosen to provide better chances for applicants who have not gone recently. Some options for the John Day include:

Rolling reservations. Simple and requires less modification to recreation.gov. More separate opportunities to get permits than a single release lottery.

Single lottery. Simpler than a rolling release lottery. This is possibly more fair because permits are issued by random chance rather than an internet speed test. It rewards long-horizon planners, may not make sense for the John Day given how flows/weather can disrupt trips and cause cancellations.

Rolling daily release lottery. Designed to provide the best of both worlds, lottery fairness with rolling availability. However, it is very complex to administer, and probably not worth developing for the short season on the John Day River.

Refund policy for cancellations

Cancellation refunds provide a carrot for cancelling when groups decide not to take a trip, allowing others to utilize permits. Evidence suggests that **no refund policies remove incentives to cancel**, probably **increasing no-shows that reduce efficiency**. Such policies may produce lower use and impacts if capacities are not filled, but by default rather than by design. If the level of no-shows is unpredictable (due to weather/flows or group/individual decision-making), agencies can't overbook to account for the not show rate. Note that any refunds for John Day permits would be accompanied by fee increases and processed through an approved business plan. Choices include:

- **No refunds.** Simple for staff to administer, doesn't require changes to rec.gov or permit pricing structure.
- **Full or partial refund with a single deadline.** Encourages boaters to return unused permits to the pool. Logistically challenging for recreation.gov, may encourage multiple/speculative reservations.
- **Full and partial refunds with a phased deadline.** Encourages boaters to return unused permits to the pool, up to a later deadline.
- **Refunds can be considered for different fees**, including the initial reservation or lottery application fee (affecting mostly longer planning horizon applicants) or user fees (per boater per day), which are more typically levied closer to the launch date and are more likely to affect short planning horizon boaters.

Secondary distributions – Returning reservations to the pool

Secondary distribution of permits for unconfirmed trips, cancelled trips, or no-shows is critical for efficient utilization. For example, data from a commercial only reservation system on the Snake River through Jackson Hole suggested that day fishing trips could be utilized on short notice by other commercial outfitters, so the system allows refunds up to one day before the trip to encourage cancellations even at the last minute.

Multi-day trips on the John Day are more challenging to organize in a short time. Outfitters suggest they would not be able to use short-term cancellations for overnight trips, and the current two-week confirmation timing is too short for most of them. In contrast, it appears that many non-commercial boaters do utilize cancellations closer to the launch date. Pilot-testing different confirmation/refund timing options and monitoring utilization might answer some of these questions. Choices for the John Day include:

- **Reservations return to the pool automatically.** Simple and doesn't require changes to recreation.gov. Favors boaters who can check recreation.gov for cancellations through the day. The platform offers a choice between returning 1) the cancellation immediately or 2) randomly within 24 hours (to prevent a group canceling a permit at a known time from telling others, who could time their reservation to obtain the cancellation).
- **Cancellations collected and returned to the pool periodically.** Favors boaters who are not able to check their computer/phone through the day. New reservations are posted periodically at known times (e.g., 8:00 am every 3 days).
- **Cancellations released on multiple dates that match phased refund deadlines.** More separate opportunities for applicants to get a permit, accommodates various planning horizons.

Confirmation policies

Confirmation policies encourage groups to finalize trip details or cancel by an appropriate deadline, and they may penalize failure to confirm with disincentives such as fees or lost reservations. A too-early confirmation deadline results in wasted administrative effort, while a too-late deadline doesn't return permits in time for others to use them.

Because John Day trips are weather and flow dependent, having a confirmation date a week or two ahead of the launch make sense. Considerations include:

- **Optional confirmation.** Reminds users about upcoming trips, encourages them to check conditions and finalize planning.
- **Mandatory confirmation.** Automatically returns permits to the pool if unconfirmed. Users who have booked speculative trips or haven't finalized their planning may lose their permit, making it available to others.
- **Earlier confirmation deadline.** Fewer cancellations on confirmation date, more prospective confirmations, but greater chance of cancellation permits being utilized by other boaters.

- **Later confirmation deadline.** More cancellations on confirmation date, fewer prospective confirmations, but less chance of other groups utilizing cancelled permits.
- **Passenger roster at confirmation.** This is a common practice for other rivers and outdoor destinations. A passenger roster is the only feasible way to identify and prevent multiple permit speculation.
- **Passenger roster includes zip codes or other information.** Helps river managers understand their visitors (e.g., zip codes show travel distances and possible planning horizons). This common practice can include birth dates, addresses, drivers license IDs, etc.

No-show policies

No-shows may be the worst outcome for an allocation system because they result in permits that cannot be utilized. A no-show rate is thus an important measure of system efficiency, and any penalties intended to discourage no-shows require accurate records. No-shows on the John Day have been estimated by checks of self-registration boxes, and by on-site ranger checks, but no one claims that either method is thorough or accurate. The choices among no-show policies for the John Day include:

- **No penalty for no-shows.** Simpler for staff, no need to maintain a no-show list, and no incorrect penalties resulting from erroneous records.
- **1-year permit application ban for first no-show.** In a no-refunds plan, an application ban is probably the only way to incentivize returning permits to the pool.
- **1-year permit application ban after third strike.** Provides an incentive to return unused permits, but includes a buffer for oversights by users or the agency.
- **5-year ban for confirmed multiple permit holders.** Although this penalty would not be administered often, it sends a clear message to multiple permit holders and could reduce unused permits. Requires accurate trip roster checking.
- **Multiple strikes before ban.** As with third strike rule, includes a buffer for oversights by users or the agency.
- **Penalty fees.** Agencies can assess penalty fees for cancelling after a certain date. These are common in the travel industry by private corporations, but may not be allowed in a public agency, and might require development as something like a performance bond.
- **Bad boater lists.** Agencies can track those who violate cancellation or no-show policies, and apply sanctions to individuals that later apply for a permit (e.g., no-shows cannot apply for a permit for one year). Because bad boater lists rarely prevent a trip (they just preclude a new application), effectiveness of this penalty is not clear.

Some users favor forgiveness for reasonable excuses when they no-show or fail to cancel in a timely period. Agencies generally apply professional judgment when assessing such claims, but American

Whitewater has suggested a panel of private boaters (“a jury of one’s peers”) to pass judgment (Robertson, 2003). This may be over-kill, but the goal is to encourage good behavior by notifying agencies as soon as they need to cancel a trip, not punishing those who are legitimately unable to follow through with trip plans.

Allocations for special exception groups

Some rivers have special policies for groups such as charities, non-profits, access-disadvantaged groups, or others who are unable to compete fairly for permits. Challenges for these kinds of merit-based allocations include determining which groups are worthy, and deciding how many permits to reserve in this category. History suggests that both outfitters and private groups may try to bend the rules, and lines often blur between outfitters or private users versus charities or non-profits. Fairness issues also arise if special exception groups occupy highly competitive launch dates. Considerations for the John Day include:

- ***Reasons for allowing particular special exception group(s)?*** Probably needs a rationale to fit with some larger agency goals and identified needs.
- ***Must be on pre-approved list to qualify?*** Ensures that special permit applicants meet the requirements. Requires attention, upkeep, and proper interpretation of the rules by BLM field office staff.
- ***Compete for the same permits as private and commercial trips?*** Simple and requires no attention from staff. Prevents people from using special exception group policy as a back door to obtaining regular non-commercial or commercial trips.
- ***One special exception permit per segment/per day, weekdays and non-peak weekends only.*** Provides a way for special exception groups to get a permit, but it avoids competition for high-demand launch dates.
- ***One special exception permit per segment/per day, allowed before the release date and for any day of the season.*** Provides better opportunities for special exception groups, but might exacerbate competition and take permits away from regular commercial or private trips.

Chapter 5: Possible Permit System Alternatives

The following section describes one no action and three action alternatives for allocating overnight use on Segments 2 and 3. For each, we describe the general elements of the system (see previous discussion of management levers for more detail) and describe the issues it may address.

Alternative 1: No action – *status quo* combined pool

- Rolling daily releases for reservations.
- 50% rounded up at four months, 50% at one month prior to launch dates.
- Commercial and non-commercial trips compete in the same pool for reservations.
- Currently includes an overbooking allowance for some individual outfitters, although it was planned to phase out. This allows outfitters with a history of extensive use to request a capacity exception for a small number of trips, if they have been unable to obtain combined pool reservations.
- Overnight trips cost \$26 per group (\$6 for reservation administration fee; \$20 for permit fee, up to 16 people). No refunds.
- Boaters must declare entry/exit dates and locations at booking.
- Cancellations return to combined pool immediately for others to use.
- Anecdotal evidence suggests some groups may reserve more than one trip, waiting to assess flow/weather information before choosing a date (labeled multiple or speculative permit issue). Individual applicants may only hold one permit at a time, but groups are currently not prohibited from multiple permits, and no data assess prevalence.
- No-shows are poorly monitored because self-registration box rules are unclear, and monitoring by rangers or Oregon State Parks staff is sporadic. Overall, insufficient data to assess this.
- A two-year permit ban for a no-show party leader has not been enforced due to common non-compliance.
- All campsites are first-come, first-served (FCFS).
- No regulations about multiple day layovers at campsites.
- No permits for special exception groups.

What No Action does...

- Conceptually, a combined pool requires less active management, other than setting capacity-based limits on reservations at the start of each year.
- In practice, rolling daily releases require considerable BLM staff time because applicants frequently call the field office with questions or complaints for a 6-7 month period.
- Combined pool competition is more challenging for outfitters than controlling their own allocation.
- Poor tracking of confirmations and no-shows make it hard to accurately estimate and describe total utilization.

- Non-commercial boaters may unfairly out-compete commercial boaters if they obtain multiple permits (prevalence of this behavior has not been documented).
- Internet connection speed may be a factor in permit success (prevalence not documented).
- Capacities are not met on some days so permits remain available, although that only becomes apparent within a few days of launch dates because of late cancellations. This is too late for other boaters to use.
- Because extreme weather or flows may cause high no-show rates (ranging up to 100% based on sporadic checks), these also can't be used by other boaters.
- Lack of cancellation incentives means some applicants may hold unused permits, with cancellations or no-shows too late for others to use them.
- Fee pricing structure does not reflect costs of resource impacts, facilities, and staffing; additional resources could improve BLM management.
- Declaring entry and exit details while booking on early release dates may be inaccurate.
- Outfitters with overbooking phase-in permits can probably insure their long-term average use levels by using that safety net.
- Outfitters without overbooking phase-in permits cannot guarantee a trip date for clients, although daily attention to picking up cancellations often allows them to meet that demand (sometimes within a few days of the trip).
- The system provides no opportunities for special exception groups.

Common to action alternatives:

Cleaning up the system with adjustments, efficiencies, or incentives

All three action alternatives that follow include several common elements. These adjustments, efficiencies, or incentives (labeled AE&Is) are management levers that provide benefits regardless of the other changes made to allocation systems.

- Re-purpose the current total fee as an application fee -- \$26 for applying for a reservation or to participate in a lottery (\$6 for recreation.gov administration, and \$20 per trip to discourage multiple speculative applications).
- Non-commercial applicants required to sign initials next to key policies on the permit reservation form.
- Boaters must choose one date and cancel redundant permits within 24 hours of making the reservation.
- Reservation fees are fully refundable if a trip is cancelled, any time before the confirmation deadline (two weeks before the launch date).
- Apply additional boater fees (beyond the reservation/lottery application fee), e.g., \$5 per person per day due at confirmation (two weeks before launch), along with trip rosters. Boater fees are fully refundable any time up to one week before launch, but non-refundable afterward.
- Permit holders must provide a trip roster (full name and zip code for permit holder and all participants) at confirmation (two weeks before launch date).
- No boater can be listed on more than one permit trip roster at a time. In practice, this prevents boaters from participating in more than one in any two-week period, encouraging those with multiple permits to cancel the ones they won't use two weeks before the trip. After completing a trip, a boater may be added to another trip roster.
- Multiple permits (two or more permits with *verified* overlapping names on trip rosters) will cause all associated permits and fees to be forfeited.
- Permit holders can add names to a trip roster between confirmation and launch, but will need to pay boater per day fees for such additions. They can remove people from a trip until the day of launch, but fees will not be refunded for subtractions past one week before launch.
- Boaters must declare entry/exit dates and locations at confirmation (used to calculate fees).
- Failure to confirm permits will forfeit the permit and the original \$26 application fee.
- Rangers will spend a sample of days at key launches to monitor no shows.
- Rules will specify penalties for no show trips.
 - No shows forfeit all fees paid (for the application and per day boater fee).
 - All boaters on the roster of a no-show trip are banned from applying for John Day permits for one year (no show must be confirmed by ranger monitoring).
- No multi-night layovers are allowed in campsite-limited areas (to be defined on a map).

- BLM maintains a list of special exception groups (see discussion above). Such groups may apply for a special exception permit on one segment per day on non-peak days (before May 15, after July 1, or on non-holiday Mondays through Thursdays May 15 and July 1).
- For combined pool alternatives, outfitter permits are identified by a separate log-in or mandatory check box to ensure that commercial and non-commercial trips are recognized in data sets.

What the common to all AE&I elements do...

- Application refunds encourage cancellations before the two-week confirmation deadline, allowing use by groups with short planning horizons.
- Per person per day fee at the two-weeks-before-launch confirmation deadline, along with refund within one week of the launch, discourages multiple permit speculation.
- Per person per day fee provides more resources for BLM from larger parties, which produce greater impact or maintenance costs.
- Initialing next to key policies encourages reading them, providing fewer excuses for boaters that break the rules.
- Trip rosters (and subsequent comparisons with other confirmed trip rosters) can discourage multiple permits. Violators can be penalized by banning from permit application for one year (bad boater list).
- Boaters on trip rosters for no show trips can be identified on the same bad boater list (encourages cancellations, discourages no shows).
- Zip codes on trip rosters help describe geographic distributions, assess travel patterns, and estimate planning horizons for different types of trips (e.g., shorter vs. longer, commercial vs. non-commercial).
- Declared entry/exit dates and locations are more accurate when reported at confirmation (closer to the launch date).
- Application and boater per day fees provide incentives to encourage cancellations and discourage no-shows.
- Data differentiating commercial and private trips allows separate analysis without further user input.
- Special exception trips are allowed, but at lower use times.

Alternative 2: Combined pool with AE&I elements; possible split later

In addition to the AE&I elements described above, ***this combined pool alternative specifies three years of intensive monitoring*** (of applications, confirmations, fee collections/refunds, trip rosters, cancellations, no shows, and campsite use). Monitoring will help BLM make efficient, equitable, data-based allocation decisions, particularly about splits for commercial vs. non-commercial vs. special exception allocations.

During the monitoring period...

- Each outfitter receives an individual overbooking quota of one or more trips for the season.
- The quota is based on a percentage of the previous year's overnight use for the entire river.
- Outfitters can access the overbooking portal, but contact the field office to obtain a permit.
- The primary allocation system for the monitoring period remains rolling daily reservations in a combined pool.
- Rolling release timing will be adjusted to six months and one month (a change from the current four months and one month).
- Cancelled permits return to the pool at a random time within 24 hours of cancellation or failure to confirm a trip.

After the monitoring period...

- BLM will consider developing a split system with non-commercial, commercial, and special exception allocations. If implemented, the split will be based on actual use levels in each sector during the monitoring period.
- BLM may allocate permits within the three sectors differently.
 - Non-commercial trips may be allocated by reservation (as during the three-year monitoring period), or by a long planning horizon lottery followed by shorter-horizon reservations of cancellations and failed confirmations (see Alternative 3 below).
 - Commercial trips may be allocated by rolling daily releases at multiple release dates that fit with commercial planning horizons.
 - Special exception permits will be allocated on a case-by-case basis for use during non-peak periods.
- The current overbooking/phase-in permits allowed for some outfitters will be discontinued.
- Left-over permits from any pool will be allocated through a combined pool, with short planning horizon rolling reservations available one week before launch dates.

What Alternative 2 does...

- Outfitters will have time to scale their businesses before the split allocation is established.
- New outfitters can gain entry and get established by successfully competing in the combined pool (number of new outfitters limited to 10% increase per year).
- Outfitter overbooking quotas provide confidence to book trips. If combined pool permits become available on short notice, overbooking isn't needed.
- Individual overbooking quotas reduce competition among outfitters (compared to a shared quota) but requires field office staff to track quotas and issue permits on Recreation.gov.
- BLM can pilot-test the common AE&I elements with a combined pool, before considering the more substantive (and possibly controversial) change of split allocations.
- Allows BLM to develop efficient and equitable allocations based on accurate numbers of commercial and non-commercial trips (current estimates of actual or proportional use are unreliable).
- Studies (Shelby et al, 1989; Whittaker and Shelby, 2007) have indicated that river users prefer reservations over lotteries.

Alternative 3: Combined pool with lottery, reservations, and AE&I elements

In addition to the list of AE&I elements described above, this combined pool alternative *allocates the long planning horizon block through a lottery, and the short planning horizon block and cancellations through reservations of rolling daily releases.*

- Half of all permits for each segment are released for a February lottery (about three months before May dates, four before June dates, and five before July dates).
- The other half (and any left-over or cancelled permits) are released for reservations four weeks before the launch date.
- Outfitter logins allow them to apply for multiple lottery permits (on behalf of named clients).
- Outfitters share a seasonal or weekly overbooking quota based on combined past use.
- Outfitters get overbooking permits directly from Recreation.gov without any input from the field office.

What Alternative 3 does...

- February lottery eliminates concerns about internet speed bias; all long planning horizon boaters have equal chances to obtain lottery dates several months before trips occur.
- Reduces daily questions to BLM staff throughout the season; one date for the lottery is clearly scheduled, and rolling releases do not begin until April.
- Accommodates a range of planning horizons, including longer horizons claimed by outfitters and shorter term permits about one month and two weeks before trips.
- Outfitter portal provides a safety net for those who want to book some trips in advance, even if their clients are initially unsuccessful in lottery and reservations of rolling releases. This allowance is capped at the historical commercial use levels (absolute numbers which can be documented).
- Shared outfitter quota for overbooking requires no input from field office staff.
- The shared outfitter overbooking quota could be monopolized by a small number of outfitters; it does not assign allocations to individual outfitters like the current overbooking phase-in program.
- Special exception groups compete for the same permits as commercial and private boaters, with no constraints on the timing of their trips.

Alternative 4: Split pool now; lottery + reservations in non-commercial pool

In addition to the list of AE&I elements described above, this alternative ***creates a split allocation system now***. Non-commercial use would be allocated through a February lottery and rolling daily reservations one month ahead of trip dates. Commercial use would be allocated via rolling daily reservations at several longer planning horizons. The percentage of the commercial split is based on best available information about the annual number of commercial trips, relative to the established capacity (see use discussion in Chapter 3).

Commercial pool

- No overbooking (***unlike*** the current phase-in overbookings). After the commercial allocation of trips has been reserved, there are none remaining for commercial use.
- Outfitters compete against each other in their own shared pool; individual outfitters do not receive their own allocation.
- Total commercial allocation for each segment will be calculated from the in-season average of the busiest three- year period since 2013.
- The total commercial allocation will be released for reservations at varying (generally longer) planning horizons (e.g., 50% at six months, 25% at four months, and 25% at two months).
- BLM monitors outfitter cancellations and holds them for daily rolling soft releases to other outfitters. If not reserved by other outfitters, these cancellations will be shifted to the non-commercial pool two weeks before the trip date (because that sector is more likely to use such short horizon trips).
- \$26 booking fee, \$20 is refundable (or non-refundable) if a trip cancels before the confirmation deadline.

Non-commercial pool

- Half of the non-commercial permits would be available in a February lottery (see Alternative 3 above).
- The other half are placed in rolling daily reservation releases four weeks before launch dates.
- Left-over and non-confirmed lottery permits return to the reservation system before the start of the season.

What Alternative 3 does...

- Separate pools now for private and commercial trips.
- Outfitters secure permits on their preferred schedule, but compete with other outfitters.
- No overbooking means there will be times outfitters cannot obtain a permit on the day they want.
- Outfitters will not be able to grow their number of trips, even if demand among commercial clients grows; the allocation is set.
- Non-commercial boaters will have the same lottery and reservation options described in Alternative 3.

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Appendix A: Recreation.gov questions and answers

Overview

See [Segment Map](#) and [Descriptions](#) Click "Read More" to see what permit you need.

The [John Day River](#) offers a range of recreational opportunities including boating, fishing, and camping.

An online permit is required year-round

for both day and overnight boating trips within the Wild and Scenic section of the John Day River (Service Creek to Tumwater Falls) and is only available here on Recreation.gov.

One permit covers an entire group for the length of the trip and is based on launch date and launch segment. Launch segment and date cannot be changed.

LOW SEASON

- Choose Low Season in the drop down menu regardless of segment
- Choose Fall Low Season for Sep 1 - Nov 30 launches except for Segment 1A or 1B

HIGH SEASON

You do not need a separate permit per segment. You may takeout at any boat ramp downstream of your launch point even if you float into other segments. Exceptions: Segment 3 and Long Distance. Click each [Entry Segment link](#) for details.

- **Segment 3A:** Entering the Wild and Scenic section at Service Creek including launching upstream of Service Creek (Example: Service Creek to Clarno)
- **Segment 3B:** Launching at Twickenham, Priest Hole, or Lower Burnt Ranch

Segment 3A and 3B High Season permits do not allow parties to takeout downstream of Clarno

- **Segment 2A:** Launching at Clarno (i.e. Clarno to Cottonwood)
- **Segment 2B:** Launching at [Thirtymile](#) (i.e. Thirtymile to McDonald's Ferry)
- **Segment 1A:** Launching at Cottonwood Bridge (Burres)
- **Segment 1B:** Launching at Starvation Lane, Rock Creek, or [McDonald's Ferry](#)
- **Long Distance Permits High Season Only:** (i.e. Service Creek to Cottonwood)
 - **This permit is for parties who want to launch in Segment 3 and float past Clarno.**
 - If you want to takeout at Clarno, a Segment 3 permit is the correct option
 - Clarno to Cottonwood is not Long Distance, it is 2A
 - Launch options are available for all Segment 3 boat launches
 - Takeout options will not allow for Clarno but are available for boat ramps downstream of Clarno
 - If you are floating from upstream of Service Creek obtain your permit for the day you will pass Service Creek

If you launch in Segment 3 the last week of April (Low Season) and plan to float past Clarno you also need a High Season permit for Segment 2A for the day you plan to float past Clarno unless you are below Clarno on April 30. We recommend limiting layovers during this transition period.

Parties are required to register at the boat launch. Print the permit and leave the bottom registration section of the permit in the box at the launch kiosk. Carry the rest of the permit on the river in an accessible location.

Whitewater boating skills are necessary to navigate all sections of the river. Water levels fluctuate greatly.

May through early July often have the best flows. See [water level recommendations per craft](#) , [Current water levels](#) , [short term](#) and [long term](#) flow forecasts. Find descriptions at [American whitewater](#). Flows can change quickly; secure boats!

Visit our [BLM John Day River](#) website for more information.

Permit & Season Information

This permit is for an Overnight boating trip. [For Day Use permits click here.](#)

Permits are unlimited except during High Season which is from:

- Service Creek to Tumwater Falls (May 1-July 15)
- Cottonwood Bridge (Burres) to Tumwater Falls (September 1-November 30)

Daily Rolling Release: High Season permits are first-come first-served and become available on Recreation.gov at 7am Pacific Time 4 months and 1 month in advance of a given launch date. See the [High Season Release Schedule](#) .

You cannot print your permit more than 14 days before your trip. Prior to printing your permit, you can cancel directly on Recreation.gov. Once printed, you must email or call the BLM to cancel. Cancelled permits return to the Recreation.gov availability calendar. See Fees/Cancellations.

Trip leaders or alternates must be present the entire trip. Add alternate trip leaders when first obtaining your permit, they cannot be added later. You can be a trip leader or alternate on 1 overnight permit at a time.

Important Dates

DATES	INFORMATION
May 1, 2024 - July 15, 2024	Spring High Season between Service Creek and Tumwater Falls
September 1, 2024 - November 30, 2024	Fall High Season between J.S. Burres (Cottonwood Bridge) and Tumwater Falls
January 1, 2024 - December 31, 2024	Daily rolling release allows 50% of permits to become available for reservation 4 months prior to a given launch date at 7am PT. See the High Season Release Schedule.
April 1, 2024 - December 31, 2024	Daily rolling release allows remaining 50% of permits to become available for reservation 1 month prior to a given launch date at 7am PT
December 1, 2023 - April 15, 2024	Thirtymile Boat Launch is not accessible by vehicle from Dec 1 - April 15 during the winter closure of Armstrong Canyon Rd.

How Does the Quota Work for this Permit?

Quota for Overnight High Season permits is measured in the number of boating groups entering the Wild and Scenic River (Service Creek to Tumwater Falls) per day. One permit covers an entire group.

Low Season quota: Unlimited

High Season quota (total groups per day):

50% of the following quota (rounded up to a whole number) will be released 4 months in advance of a given launch date. The remaining 50% will be released 1 month in advance. See [Quota](#) and [High Season Release Schedule](#) .

- Long Distance Permits: 2
- Segment 3A: 8
- Segment 3B: 9
- Segment 2A: 5
- Segment 2B: 4
- Segment 1A: 4
 - 2 in Fall High Season
- Segment 1B: 2
 - 1 in Fall High Season

Stay limit is 14 days.

Groups may have no more than 16 people.

Except Segments 1A & 1B:

- **Group size limit is 4 from Sep. 1 - Nov. 30**
- **Stay limit is 1 night per segment year round**

Size and stay limits are put in place to help protect the resource and for solitude. Respect to other boaters and the river by remaining within these limits.

See [Boater Etiquette](#)

When reserving a permit on this river, I understand that:

- The permit is valid only for the entry date and entry segment for which it is issued;
- **After a reservation is made, the entry date, entry segment and trip leader may not be changed and alternate trip leaders may not be added;**
- Permit fees are non-refundable;
- The maximum group size is 16 people and groups may not combine at any time if this number would be exceeded. In Segment 1A and 1B in the Fall (September 1-November 30), the group size is 4 people;
- I must print, sign, and carry my permit on the river, leaving the bottom boater registration portion in the box at the launch kiosk. Permits may be printed up to 14 days before the launch date on Recreation.gov;
- The Trip Leader or Alternate is required to be present on the entire trip and may be requested to show the permit and a photo ID during the trip;
- As Trip Leader, I am responsible for the actions of my group;
- As Trip Leader, I will be at least 13 years old before the launch date;
- I may hold a maximum of one overnight permit and three day-use permits at one time;
- My group must carry out our solid human waste in an [approved portable toilet system](#) ;
- No wood or charcoal fires are allowed from June 1-October 15. When allowed, fires must be contained in a metal firepan and all ashes carried out;
- This reservation/application is for a private (non-commercial) trip unless I am authorized to be a commercial outfitter on this river.

Annual Fire Closure

- The John Day River is closed to all campfires, charcoal fires and propane campfire devices from June 1-October 15 each year.
- Propane and white gas cooking stoves and shielded lanterns are permitted.
- Smoking is permitted only in a closed vehicle, while standing in the water, or while in a boat on the water.
- Using or possessing fireworks is prohibited.

Fires in Firepans Only

- When fires are allowed, ground fires and rock fire rings are not permitted. [Watch for dry vegetation](#) .
- Fires and ash must be completely contained in an [elevated metal firepan](#) with sides at least two inches high.
- Burn wood from home, charcoal, driftwood, or dead and down vegetation. Standing vegetation, either dead or alive, may not be cut or gathered.
- All campfire residue must be carried out of the canyon.

Portable Toilet Requirement

- On overnight and day trips, all boating groups are required to carry and use a water-tight, [reusable toilet system](#) large enough to service the entire party for the complete length of the trip.
- All buckets used to carry human waste are required to have a rubber gasket in the lid.
- Dump stations are not available at takeouts. See the list of [rv dumpstations](#) .
- Plastic bags are not allowed, except human waste bags specifically designed for this purpose.
- Dispose of used human waste bags in a garbage dumpster. Disposing of bags in a vault toilet is strictly prohibited.

Pack It In, Pack It Out

- Carry out all garbage, including cigarette butts, toilet paper and organics.
- Pack out food scraps to keep critters to a minimum.
- Do not bury trash or toilet paper; animals may dig it up
- Strain all dish/wastewater through a screen to remove food particles, and pack them out.
- Scatter wastewater over a wide area, away from campsites, at least 200 ft. from the river.
- Soap should be used sparingly, as even biodegradable varieties are slow to break down.
- At flows above 500 cfs, urinate in the river.
- At flows below 500 cfs, urinate at least 200 ft. away from camp.
- Ensure all [boats are clean, drained and dry](#) prior to launch.

Motorized Boating

- Clarno to Cottonwood is closed to motorized boats year-round. From Cottonwood Bridge downstream, the river is closed to motorized boats from May 1 - September 30. Between Service Creek and Clarno, the river is restricted to electric motors from May 1 - September 30.
- There are no motorized boat restrictions upstream of Service Creek.
- The river is closed to personal watercraft (jet skis) year-round upstream of Tumwater Falls.
- See [Motorized Boating](#) for more information.

Fee Policies

Reservation Fee:

A \$6.00 non-refundable reservation fee is required for each permit issued. Only one permit is needed per boating group. Each member of a group must remain with the trip leader while on the river.

Recreation Fee:

A non-refundable recreation fee is due when a reservation is made for trips entering the Wild and Scenic section during the High Season (between Service Creek and Tumwater Falls from May 1- July 15, and between Cottonwood Canyon and Tumwater Falls from Sep 1- Nov 30).

The recreation fee is \$20 per overnight trip per group, or \$10 per one-day trip per group. All recreation fees are used directly on the river to help keep launch sites and river campsites clean.

Cancellation & Change Policies

Change Policy:

- A permit authorizes the trip leader to enter a specific river segment on a specific date. Once reserved, **the entry date, entry segment, trip leader and alternates may not be changed.**
- Before printing your permit or at the launch point, you may change your:
 - group size
 - # of boats
 - take-out & date
 - Launch point if within segment 3B
- The trip leader is **required to tear off the bottom of the printed permit and deposit it in the box at the launch kiosk.** Mark allowed changes.

Cancellation Policy:

- **Failure to cancel your permit or to register your party at the launch kiosk will trigger a “No Show” status.**
- See no show policies.
- If you cannot make a trip, you must cancel your permit on Recreation.gov. Cancel ASAP to allow other boaters to use your space. Follow instructions under your existing reservations.
- If the permit is already printed, you must email or call the BLM (blm_John_day_river@blm.gov, 541-416-6700) to cancel.

No Show Policies

Boater Registration is required.

- To register your trip, tear off the Boater Registration form, which is the bottom part of your printed permit. Mark any allowable changes to the permit details, and deposit the form in the boater registration box at any launch point kiosk.
- If you fail to submit your Boater Registration and you did not cancel your permit, you will be flagged as a “No Show.”

“No Show” permit leaders will be added to a restricted list and will not be able to reserve another John Day River permit for two years. We are implementing this no show penalty to encourage those who can't make the trip to cancel their reservation, making that slot available for someone else to book. Please be mindful of your fellow boaters and cancel your permit as soon as you know you cannot take the trip. It could be your party one day waiting for a cancellation.

Appendix B: John Day River boater reviews from Recreation.gov

Guest reviews from Recreation.gov characterize use patterns and private boater experiences. This is not an exhaustive list, select representative and tagged "Most Helpful" reviews are shown verbatim. Exhaustive analysis of all guest reviews was outside the scope of this study.

Zone: *Segment 2B*

Reservation Dates: 7/1/2021 - 7/5/2021

To many big groups doing layover nights in good camps.. In some cases 3/4 nights.. This creates a huge bottleneck, this permit system only works if people keep moving...Lesser used camps are rock piles or horribly maintained, if at all.. The ramp at Cottonwood is a joke, remove that pile of brush and double the size...

Zone: *Low Season*

Reservation Dates: 7/19/2022 - 7/22/2022

Used kayaks, from Clarno to Thirty Mile. Cfs at put in was 325; 290 at take out. Three-four rapids were tricky, particularly of course upper and lower Clarno. No one else on the river. As in years past, used JDR shuttles out of Fossil. Excellent. Wonder if the riverside campsite map can be updated. More than a few of the sites - couldn't find them. (Low Season)

Zone: *Low Season*

Reservation Dates: 4/30/2022 - 5/3/2022

I highly recommend doing a "low season" trip on the John Day and here is why:

1. The permit is easy to get. There are currently no controls to the number of trips launching in the low season (before May 1).

2. Green! For most of the year, the John Day River corridor is a beautiful array of yellows and browns, but in April it is very green.

3a. Fewer people: solitude. The demand for this river exists in May and June. Being on the river before then provides for almost total solitude. My 4-day, April 30th, launch saw the following: Day 1-one group of two. Day 2-one group of four, Day 3-two groups of four people each, Day 4-two groups (4 ppl, 6ppl, the group of 4 was from the prior day).

3b. Fewer people: campsite selection. Take your pick! Camping options abound!

4. High water. River speed of 3-5 mph. Usually I expect 1.5-2mph. The high water makes some of the camps more usable than at low water when there might not be a beach, just boulders.

5. Campfires. Early season doesn't have fire restrictions (fingers crossed the climate doesn't change that). Bring a fire pan, don't damage the shade trees that exist, and utilize safe fire practices. (Low season)

Zone: *Segment 2B*

Reservation Dates: 10/10/2021 - 10/20/2021

Low water navigation below 200 CFS is tough. Lots of pushing and boat damage.

Zone: *3A (Restricted Takeouts)*

Reservation Dates: 5/18/2022 - 5/23/2022

My family has been boating this river for decades (literally), and we've never seen it so crowded as we did on our last trip. At one camp, we could see 4 different groups around us, and one of them decided to have target practice with their guns for most of the evening. The only reason our camp worked that night was due to abnormally high water levels (at low water it's not available). When we left that camp

the next day, the group behind us snagged our camp and said they'd spent 4 hours the previous day looking for camps. While in theory the permit system is a good idea, if it's not checked/regulated, from our latest experience, it seems to have made the river more crowded! Our permits were not checked at either the launch or take out locations. In a 4 hour period we saw 24 rafts, 1 canoe, 10 IKs, and 1 SUP pass our camp. It was insane.

Zone: *Segment 3B*

Reservation Dates: 5/31/2021 - 6/3/2021

last camp we stayed at was not what i would say leave no trace behind.

fire charcoal nut shells and tp in bushes. other 2 camps we had looked good.

outfitters seem to have boat that burns down river to get best camping spots.

last 2 years we seen this. we like to take our time and fish. trip started at lower burnt ranch.

Zone: *Segment 2A*

Reservation Dates: 5/20/2021 - 5/24/2021

The launches are small at Clarno and Cottonwood. With the new permit system it seems like larger groups with a large number of boats are using the river. Plan your day around potential long waits to put in and take out at the launches.

Zone: *Segment 2B*

Reservation Dates: 6/8/2021 - 6/12/2021

water was just about right when we started, but got pretty thin towards the end. Sure seemed like there were alot of people on the river for the amount of permits that there were given out.

Zone: *Low Season*

Reservation Dates: 4/15/2022 - 4/18/2022

My family and I had a great time rafting the John Day in mid April. Sure, it snowed a bit, but the scenery was unbelievable, and the river was deserted.

Zone: *Segment 2B*

Reservation Dates: 6/21/2021 - 6/25/2021

Great float, lots of fishing and fun. With the number of permits that are allowed, which is too many in my opinion, quality camping spots can be hard to find which is frustrating when it's 6:00 p.m. and you're looking for a spot to get off the water. Be careful in low water conditions, it's bumpy! Other than that it's a great experience!

Zone: *Segment 2A*

Reservation Dates: 5/25/2021 - 5/31/2021

It is amazing trip, the one problem is the BLM needs to make sure people have the proper toilets in there boats as there were still toilet paper and human waste at the campsites. This is a problem that needs to be overcome with checking. I was glad to see the police half way through the trip were checking river permits and fishing licenses, but they also need to check toilets.

Zone: *Segment 3A*

Reservation Dates: 6/2/2021 - 6/12/2021

Not all map-marked campsites are actual campsites, especially the individual sites.

Zone: *2B (Thirtymile to Cottonwood Bridge)*

Reservation Dates: 6/6/2022 - 6/9/2022

There are more groups floating than permits issued. We were checked during our float which was appreciated and they agreed that there were many parties on the river without permits. It would be helpful to require shuttle services to require proof of permits.

Zone: *Segment 2A*

Reservation Dates: 5/15/2021 - 5/20/2021

The launch at Clarno is small and can bottleneck with only room for one party at a time to prepare leading to delay and frustration in the past. The new permit system limiting daily launches to six helps, but BLM should consider adding width to both the launch at Clarno and the takeout at Cottonwood clearing the willow brush trying to take over the bank particularly between the two takeouts at Cottonwood where the additional 10 launches at 30 mile can lead to long wait times.

Take a fire pan or better yet don't risk a fire getting away in the wind and skip burning wood. Conditions are extremely dry in 2021.

Big bass strike big bait.

If you are not using your permit be sure to release it in time to give someone else a chance at a great river trip.

Zone: *Segment 2A*

Reservation Dates: 5/30/2020 - 6/4/2020

Overall an amazing trip! Be prepared for a quick furious rain squall as we experienced at Clarno rapids on may 30 at 1500. ALWAYS scout Clarno rapids as it changes by flow level. There are many good camps not shown on the BLM guidebook, look and explore for them.

Zone: 2A

Reservation Dates: 5/3/2022 - 5/8/2022

The current amount of permitted daily launches felt about right. We consistently encountered other parties but it did not feel overly crowded or stressful to find camps.

Zone: 2B

Reservation Dates: 6/28/2022 - 7/2/2022

We had a great trip. The water level was right on for fishing and all the kids caught a ton of bass. Camps were clean and free of trash. There wasn't much competition for them and we were able to get all our favorite spots. Great weather window with plenty of sun. Take out at Cottonwood can get crowded, so plan accordingly and be patient!

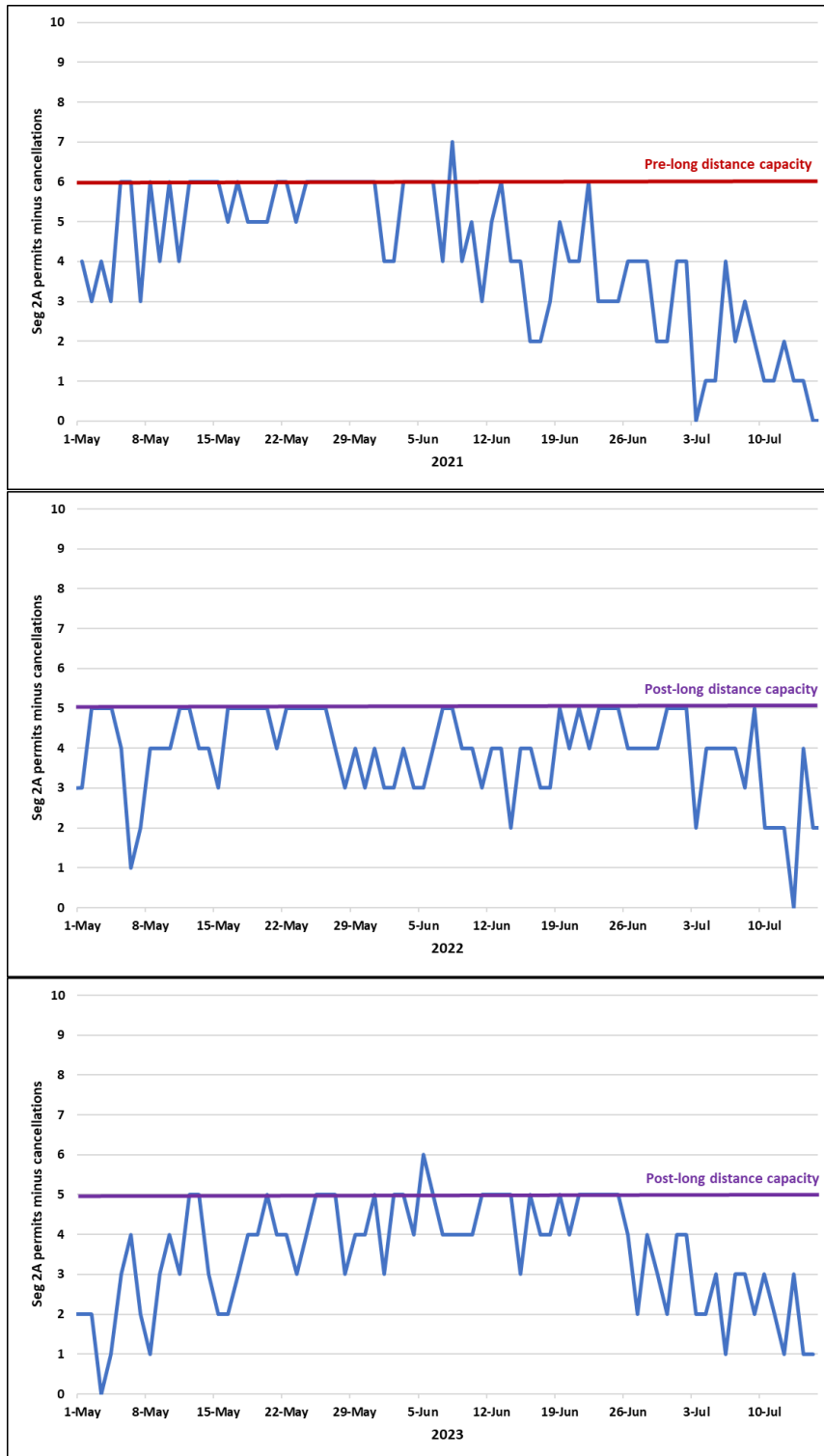
Zone: *Segment 2B*

Reservation Dates: 6/18/2020 - 6/21/2020

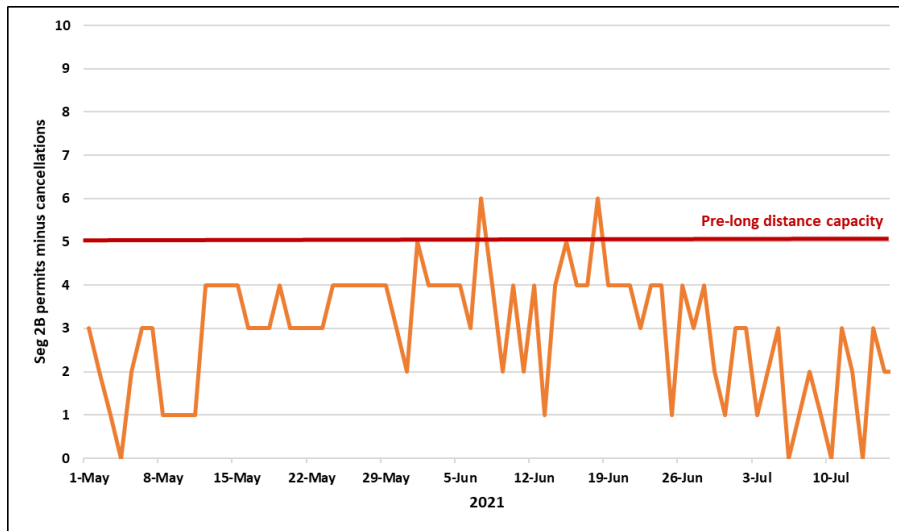
Most good campsites were all being used but we did find some place to put our tents and camp. water was getting a little bit low but i was packed heavy. shuttle did not work out so had to use backup shuttle 4 hrs later that was lots more \$\$\$\$ but saved the trip.

Appendix C: Use level graphs

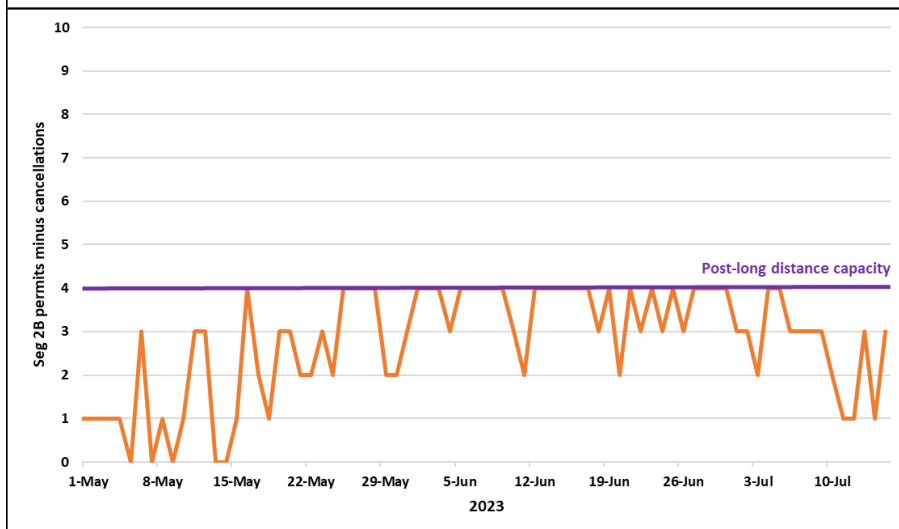
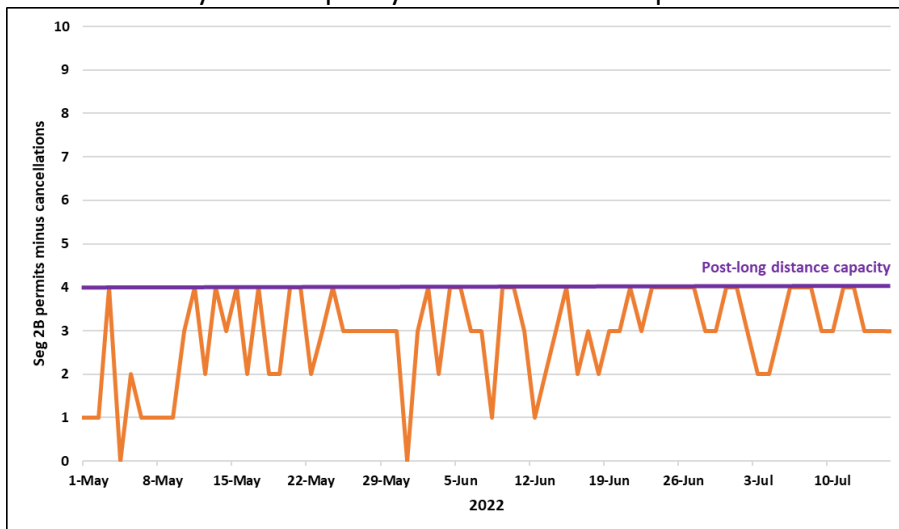
Recreation.gov Segment 2A peak season overnight permit data 2021-2023



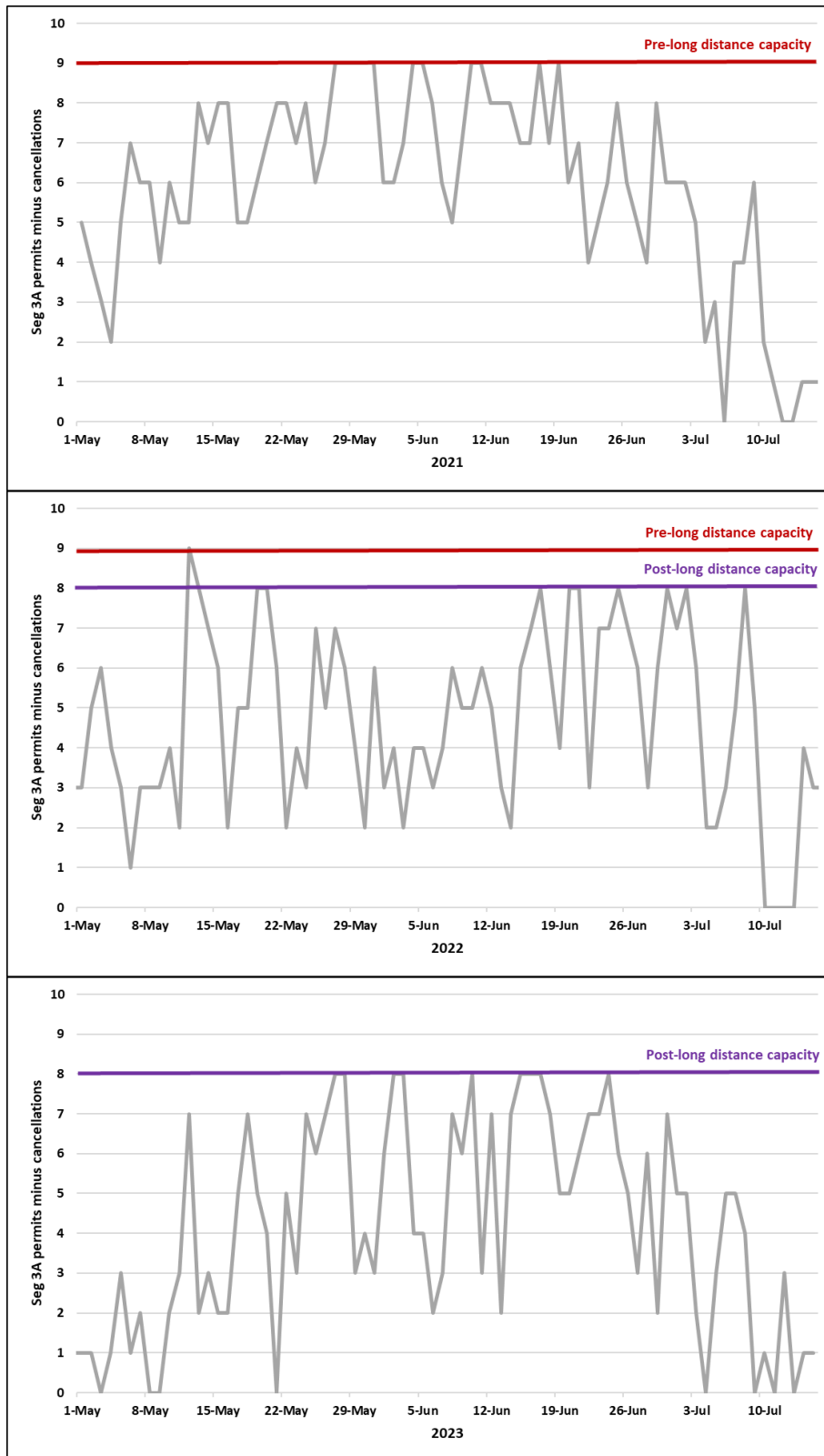
Recreation.gov Segment 2B peak season overnight permit data 2021-2023



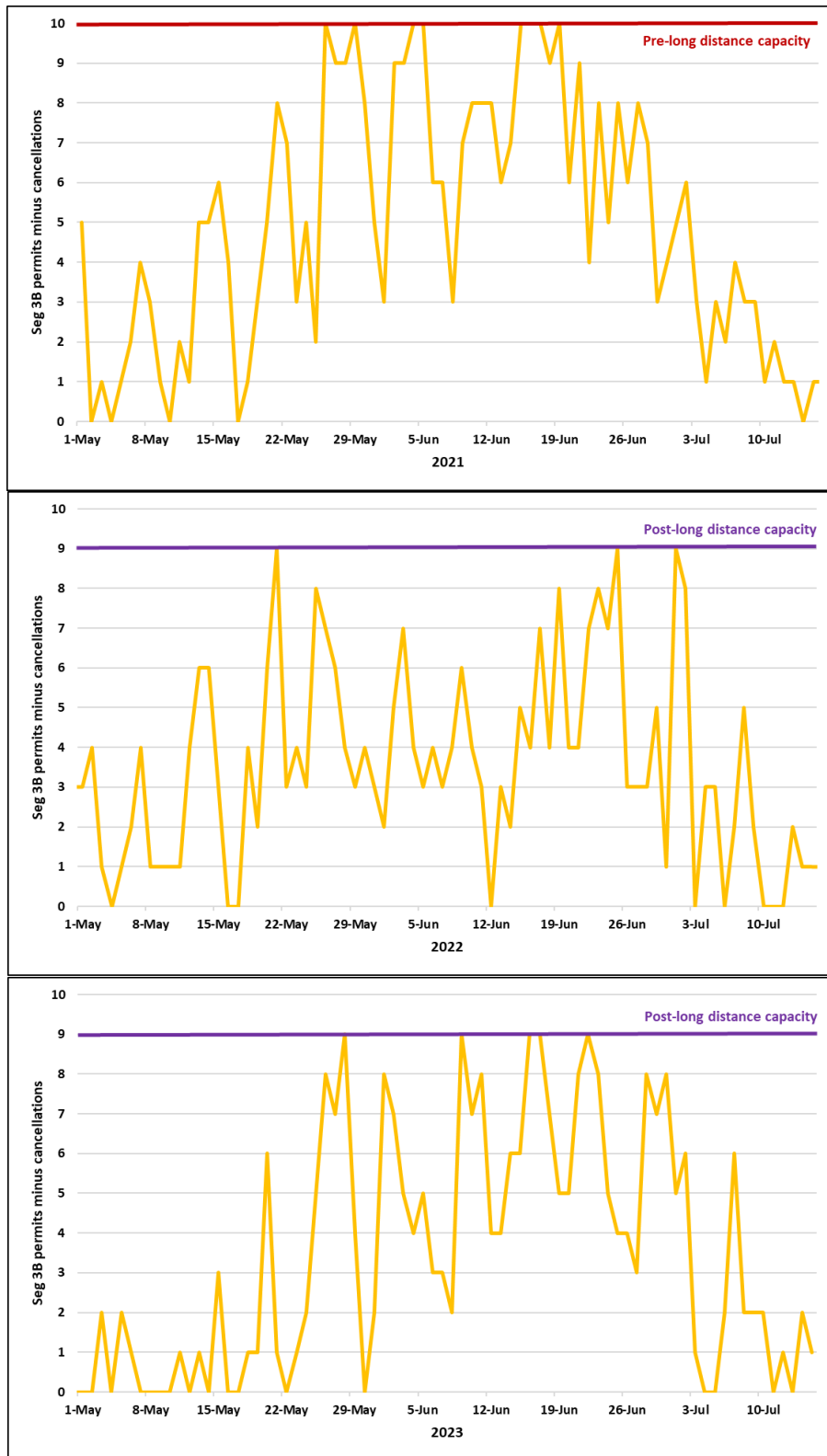
Days over capacity are administrative permits



Recreation.gov Segment 3A peak season overnight permit data 2021-2023

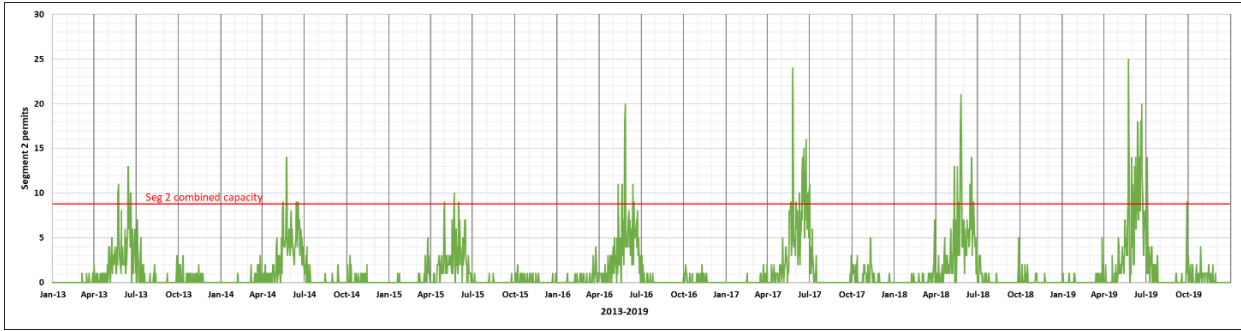


Recreation.gov Segment 3B peak season overnight permit data 2021-2023

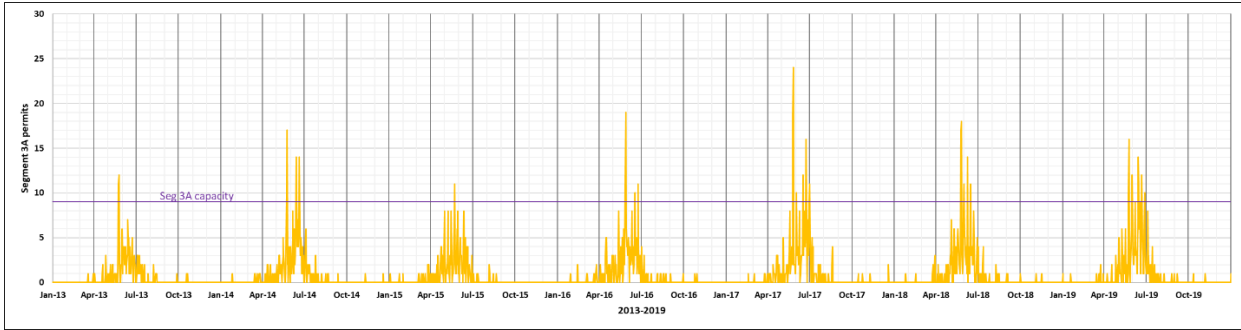


Year-round permit data from BLM website 2013-2019

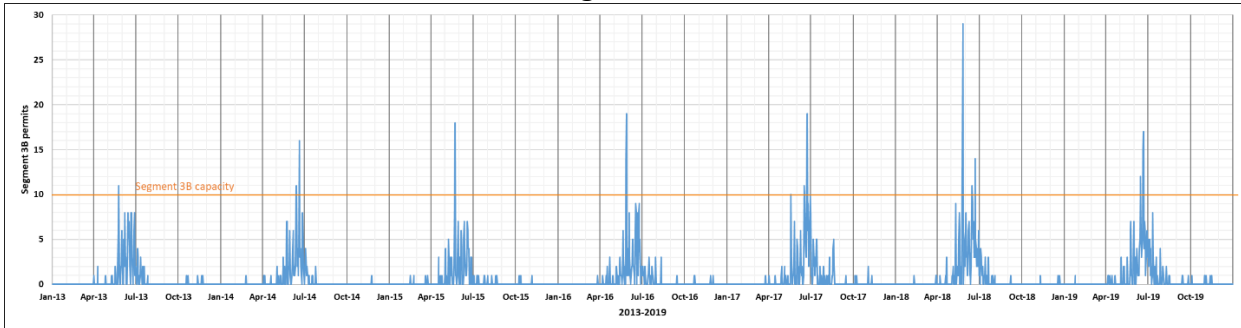
Segment 2 combined



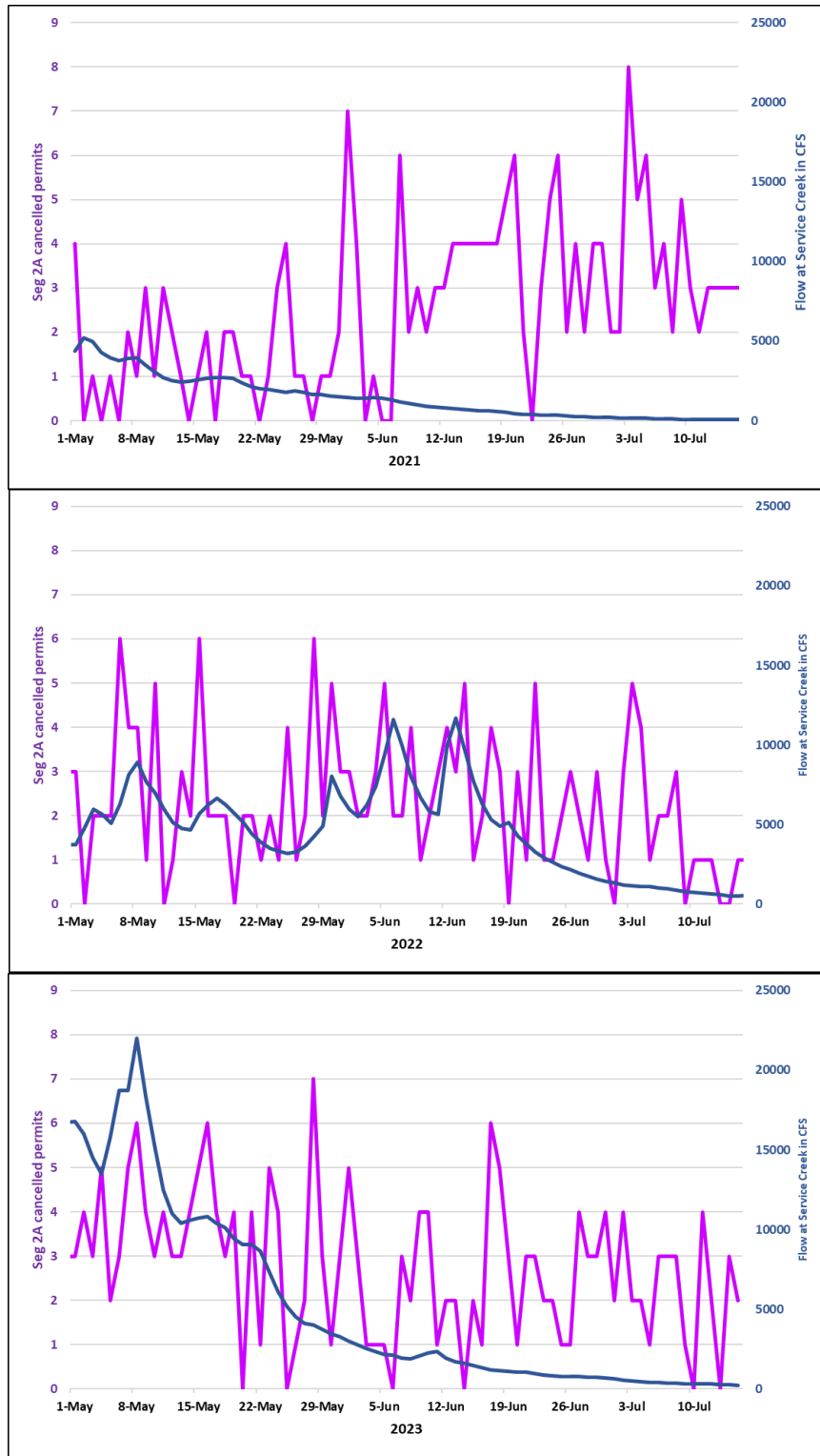
Segment 3A



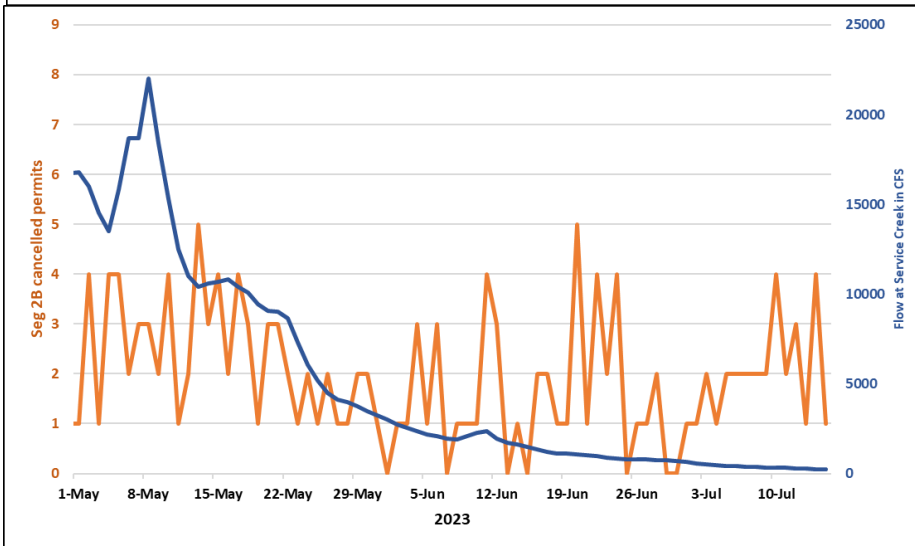
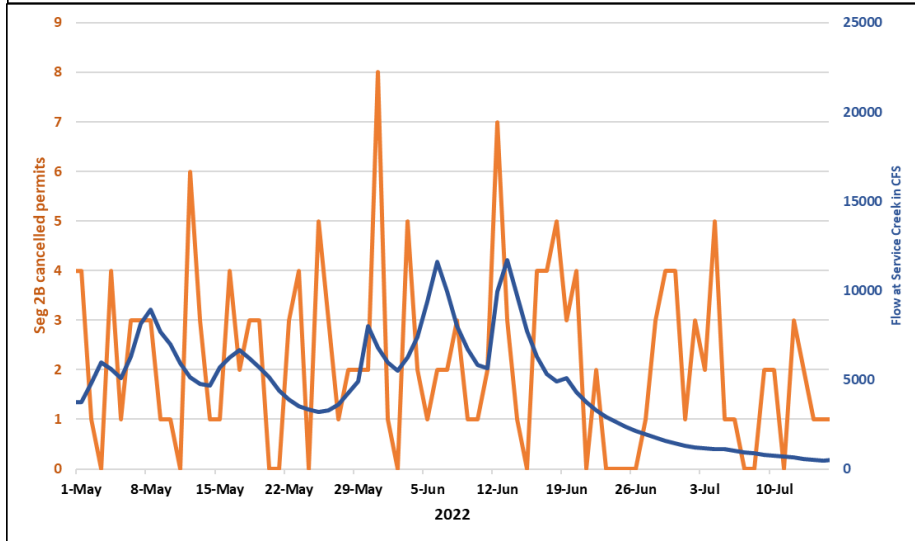
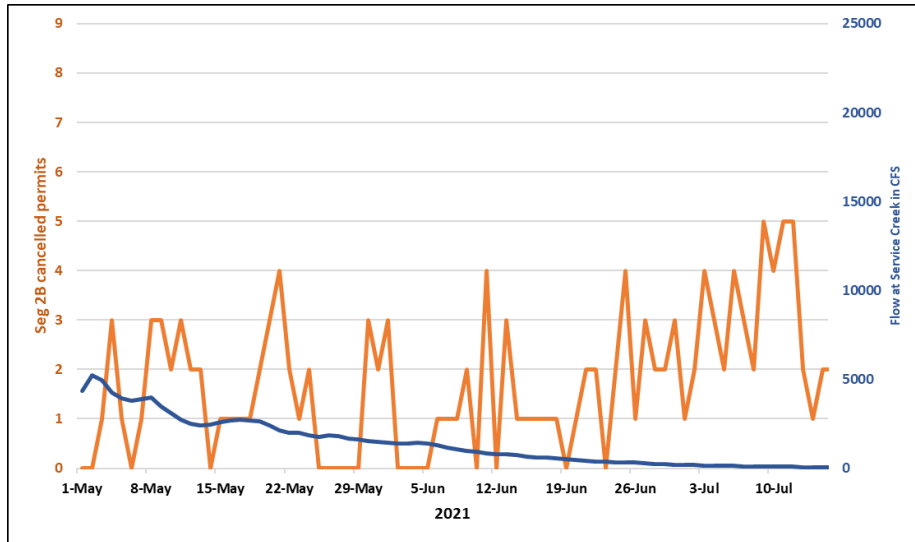
Segment 3B



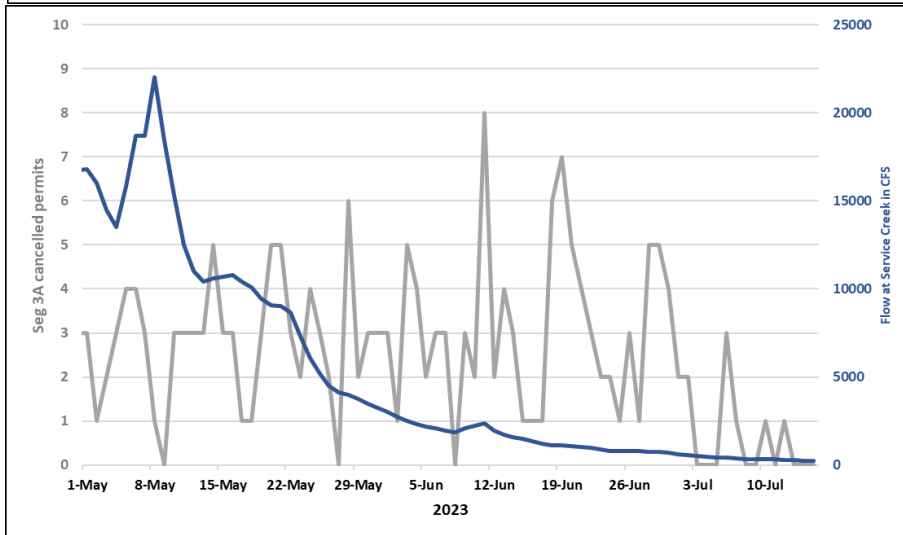
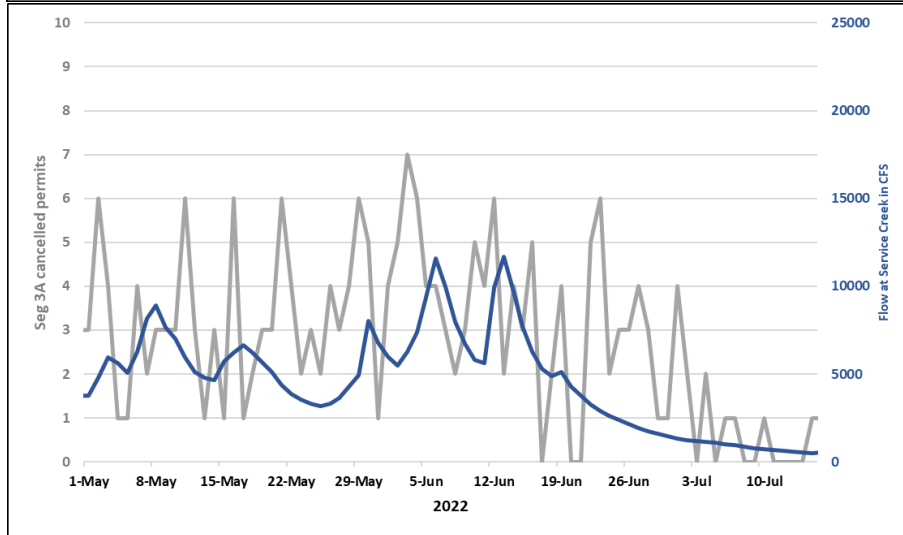
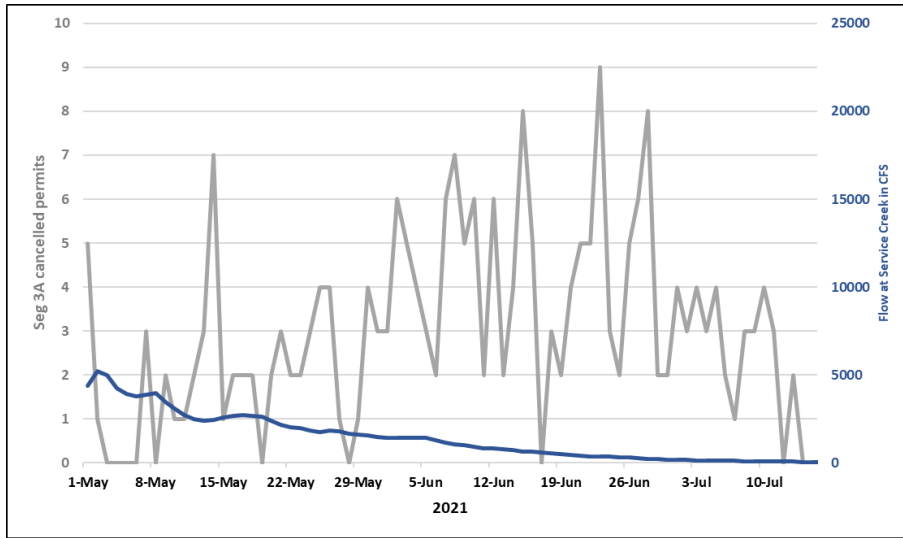
Appendix D: Flow vs. cancellations graphs Segment 2A cancellations and hydrograph



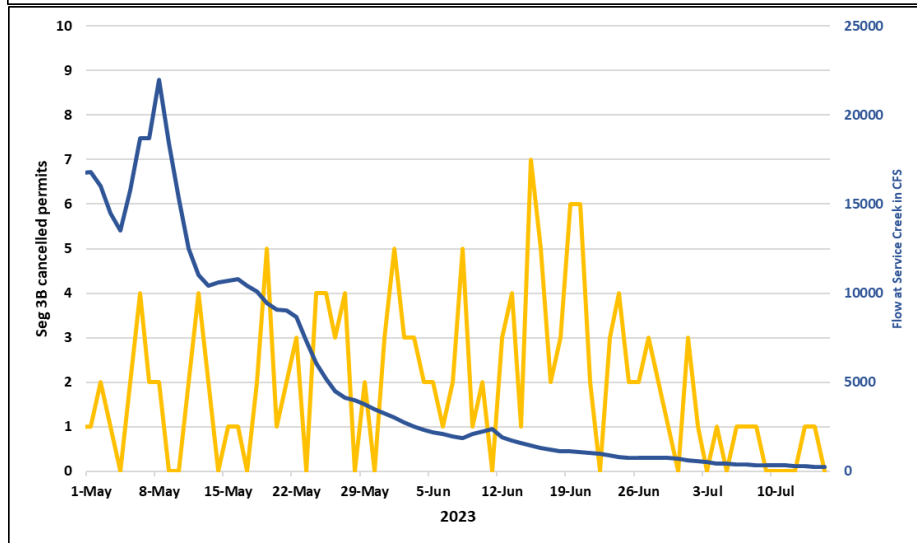
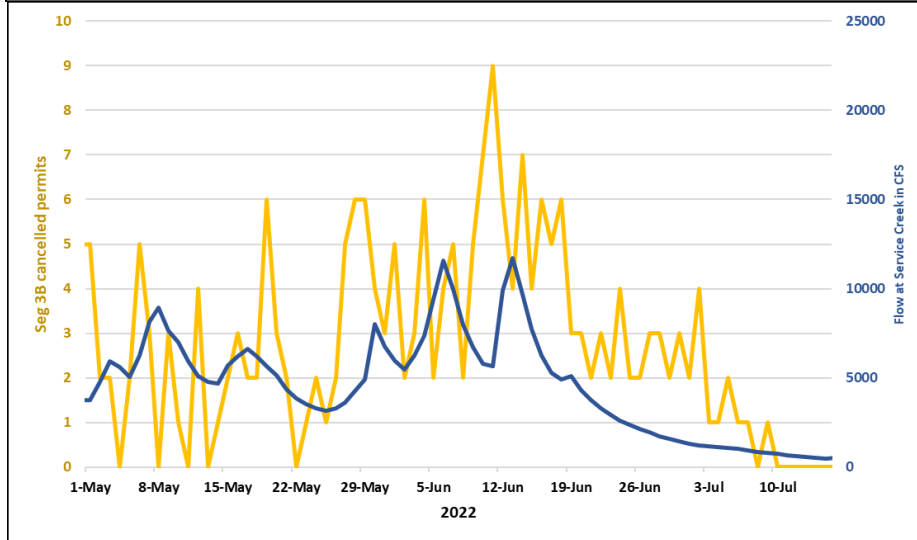
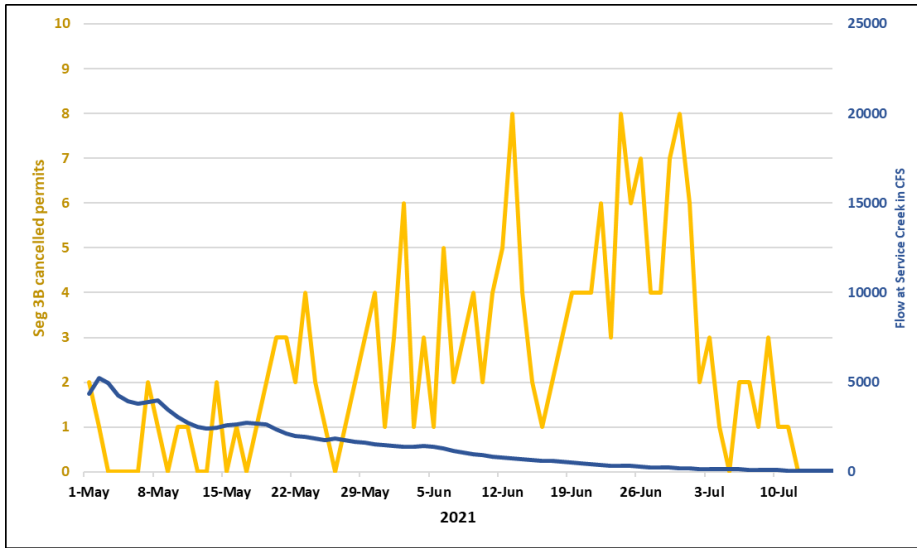
Segment 2B cancellations and hydrograph



Segment 3A cancellations and hydrograph



Segment 3B cancellations and hydrograph



Overnight permit cancellation rate by year and segment for 2021-2023

	2A	2B	3A	3B
2021	38%	37%	33%	33%
2022	37%	42%	37%	44%
2023	44%	42%	38%	36%



JOHN DAY

PERMIT SYSTEMS REPORT

MAR 2024



The John Day River runs from headwaters in the Blue and Ochoco Mountains through central Oregon. The river travels through forest uplands, ranchlands, and deep basalt canyons, providing outstanding scenery and diverse opportunities for outdoor recreation. BLM has recognized impacts from growing recreation use and established regulations to protect resources and experiences. Permits are required for both guided and unguided boaters, who compete in the same pool for permits. There have been concerns about the availability of permits, mechanisms for obtaining permits, and percentages of use in different segments.

This report reviews issues related to use, capacities, and allocation systems. It summarizes background information, assesses commercial recreation needs, and develops potential allocation options and alternatives. This report is not a decision document; it provides information for BLM to consider if it chooses to modify allocation decisions.