

TABLE VI.B.5.—USER FEE ANALYSIS FOR NON-COMMERCIAL FACILITIES

User Fee Increase	Estimated number of facilities that have costs exceeding threshold							
	Percent of budget							
	1 Percent				3 Percent			
	All	20 to 100	100 to 475	475+	All	20 to 100	100 to 475	475+
Option A:								
All	39	23	15	0	27	16	12	0
No Fee ¹	23	12	12	0	23	12	12	0
>5 Percent ²	8	8	0	0	4	4	0	0
<5 Percent ²	8	4	4	0	0	0	0	0
Option B:								
All	120	63	49	8	75	44	27	4
No Fee ¹	76	34	34	8	50	27	19	4
>5 Percent ²	28	20	8	0	24	16	8	0
<5 Percent ²	16	9	7	0	1	1	0	0
Option 1:								
All	112	55	46	11	59	36	19	4
No Fee ¹	76	34	31	11	35	19	12	4
>5 Percent ²	24	16	8	0	24	16	8	0
<5 Percent ²	12	5	7	0	0	0	0	0
Option 2:								
All	123	63	49	11	71	44	23	4
No Fee ¹	80	34	34	11	46	27	15	4
>5 Percent ²	28	20	8	0	24	16	8	0
<5 Percent ²	16	9	7	0	1	1	0	0
Option 3:								
All	223	96	88	39	108	51	45	11
No Fee ¹	143	57	52	35	77	34	32	11
>5 Percent ²	41	24	17	0	30	16	13	0
<5 Percent ²	38	16	19	3	1	1	0	0

¹ Facilities that exceed threshold and do not rely on user fees.

² Facilities that must raise fees by more/less than 5% (>5%/<5%) to cover compliance costs.

b. Tribal Facilities. Tribal operations that returned detailed surveys are all owned and operated by the tribal government and operate on a non-commercial basis. EPA performed a budget test and determined that no Tribal facility incurs costs in excess of three percent of budget under any Option. Five of 14 facilities have costs that exceed one percent of their budgets under Option 3. No Tribal facility fails the one percent budget test under Options A, B, 1, and 2. For additional information about analyses for Tribal facilities, see DCN 20447.

c. Academic/Research Facilities. Of the academic/research facilities that returned a detailed survey, only one met the criteria of being a CAAP within the scope of the rule, and might incur costs under the rule. EPA performed the budget test and determined that the facility would not incur costs in excess of one percent of budget.

d. Alaska Non-profit Facilities. EPA analyzed the impact of possible costs on

Alaska non-profit facilities by comparing the pre-tax annualized cost to reported salmon revenues. Alaska non-profits may harvest and market salmon that return to their release areas. We excluded grants, enhancement tax revenue, and income from miscellaneous sources such as visitor centers from the comparison. Fiscal Year 2000 had an unusually high salmon return (*i.e.*, large harvest). Therefore, we used Fiscal Year 2001 data from Alaska (2002, DCN 20074). For Option A, costs range from 0.97 to 1.8 percent of salmon revenues for 1998, 1999, and 2001 and 0.6 percent of salmon revenues for 2000. For Options B, 1, and 2, costs range from 1.2 to 2.3 percent of salmon revenues for 1998, 1999, and 2001 and 0.6 to 0.7 percent of salmon revenues for 2000. For Option 3, costs range from 1.3 to 2.4 percent of salmon revenues for 1998, 1999, and 2001 and 0.7 percent of salmon revenues for 2000.

e. Sensitivity Analysis for Non-commercial Facilities. EPA estimated ranges of impacts (DCN 20430) based on minimum, mean, and maximum value for operating and maintenance (O&M) costs (*see* Section V.A.2 for costing methods) for Options B, 1, 2, and 3. Table VI.B.6 summarizes the results for the sensitivity analysis for non-commercial facilities. For the one percent budget test, the impacts based on the mean values would not increase markedly if maximum O&M values were assumed. On the other hand, if evidence appears that the O&M costs resemble the minimum values, the impacts would drop by about half compared to impacts under mean O&M costs for Options B, 1, and 2. For the three percent budget test, the impacts associated with the maximum O&M costs are approximately three times higher than the impacts associated with minimum costs for Options B, 1, and 2. There is less than a two-fold spread for Option 3.