

# REDEFINING THE PERMIT PROCESS

Special Use Permits,  
Commercial Use Authorizations,  
& Short-Term Leases

Marsh-Billings-Rockefeller National Historical Park  
Saint-Gaudens National Historical Park

Kelly Sczomak  
Permit Program Specialist  
National Park Service  
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# KELLY SCZOMAK

# ABOUT ME



## CURRENT ROLE: PROGRAM SPECIALIST

- Started in new role October 2024
  - Permit Program Administration
  - Marketing/Community Outreach
  - Digital Media

## PAST EXPERIENCES

- First NPS position in 2012
  - Seasonal positions in Volunteer Management, Wilderness, Tribal Relations, Youth Programs, Interpretation, Education at SAGA, CATO, BRVB, YOSE, SLBE, MABI
- MABI Supervisory Interpretation Ranger 2017-2024
  - Community Leader
  - Event Management
    - Trek to Taste; Forest Festival
      - 25+ partners; 600+ attendees per event
  - Existing networking opportunities

# MARSH-BILLINGS-ROCKEFELLER NATIONAL HISTORICAL PARK

- **Established in 1992** to interpret the **history of conservation** and demonstrate contemporary **stewardship** practices
- **Key Features:**
  - Mount Tom Forest - oldest continually managed scientific forest in the U.S.
  - 25+ miles of trails and carriage roads
  - Historic mansion and gardens





# SAINT-GAUDENS NATIONAL HISTORICAL PARK

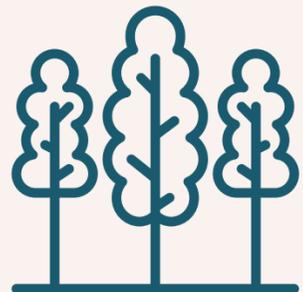
- Preserves the home and studios of 19th century **sculptor Augustus Saint-Gaudens**
- Key features:
  - Outdoor bronze sculptures of famous American works of art, inspiring landscape
  - Immersive art opportunities
  - Full-time sculptor-in-residence

# COMMUNITY INSIGHT

## Permit Experience

Do you work with permits? If so, in what capacity?





# MABI/SAGA Permit Program



## Commercial Use Authorizations (CUAs)

- Guided Hikes/Fitness Classes
- For-Profit Art Workshops
- Guided Horseback Riding (MABI)
- Guided Carriage and Wagon Rides (MABI)

## Short Term Leases (STLs)

- Outdoor Space Rentals (SAGA)
- In Progress to Change in 2025:
  - Outdoor Space Rentals (MABI)
  - Forest Center (MABI)
  - Caretaker's Garage (SAGA)
- By 2027: Blow-Me-Down Farm Rentals (SAGA)

## Special Use Permits (SUPs)

- (Current) Room Reservations/Forest Center Rentals
- First Amendment Area Use
- Filming/Photography
- Partner/Mission-Aligned Rentals and Authorizations (Fee Waivers)

*Policies and procedures for these programs are created by three, separate regional & WASO-level offices. At parks with larger operations, these programs often operate independently. CUAs fall under the NPS Commercial Services Program. SUPs fall under the NPS Special Park Uses Office. STLs fall under the broader NPS Leasing Office.*

# COMMERCIAL USE AUTHORIZATIONS

## Required when an operator provides goods or services to park visitors that:

1. Take place at least in part on park property
2. Use park resources; and
3. Are for the purpose of monetary gain or profit

## Indicators a CUA is needed:

- Commercial Advertising: High visibility, range, and cost of advertising
- Charging Rates: Fees that exceed direct costs
- Compensation to Staff: Monetary or in-kind compensation
- Frequent trips



## Authorized CUA Activities at MABI/SAGA

- Guided Hikes/Fitness Classes
- For-Profit Art Workshops
- Guided Horseback Riding (MABI)
- Guided Carriage and Wagon Rides (MABI)

## Fees (2025)

- **Application Fee:** \$350 (non-refundable)
  - Additional \$250 per CUA in same calendar year
- **Management Fees:** Based on Gross Receipts
  - Less than \$250,000: 3%
  - \$250,000-500,000: 4%
  - More than \$500,000: 5%

## Online Portal (New in 2025)

Streamlines applications, fees, and data collection.

# SHORT TERM LEASES

**Short-Term Leases are for properties and venues leased for less than 60 days.**

**Eligible Properties:** NPS facilities not typically used by visitors or available outside of normal operating hours.

**Use Cases:** Special events, including private parties, banquets, weddings, meetings, concerts

## Fair Market Value Rent Study

Fair market value rent is determined through a Market Rent Study, comparing at least three similar properties.



## Short Term Leases at MABI/SAGA

- Weddings and Ceremonies (SAGA)
  - Formal Gardens
  - Bowling Green (Shaw Memorial enclosure)
  - Lawn adjacent to the Birch Alee
  - Lower field near the Temple
- **In progress to begin in 2025:**
  - SAGA
    - Updated Rates
    - Pergola of the Little Studio
    - Caretaker's Garage
  - MABI
    - Formal Gardens & lawn
    - Mansion lawn
    - Pogue viewing area
    - French lot overlook
    - Forest Center rentals
- **By 2027:**
  - SAGA Blow-Me-Down Farm Rentals

# SPECIAL USE PERMITS

Defined as an activity that takes place in a park area, and that:

1. Provides a benefit to an individual or group rather than the public at large;
2. Requires written authorization and some degree of management control from NPS in order to protect park resources and public interest;
3. Is not prohibited by law or regulation;
4. Is not initiated, sponsored, or conducted by the NPS; and
5. Is not managed under a concession contract or lease.



## SUPs at MABI/SAGA

- (Current) Room Reservations/Forest Center Rentals
- Film/Photography Permits
- First Amendment Area Use (more on this later)
- Partner/Mission-Aligned Rentals and Authorizations

## Cost Recovery

Costs related to administering and managing SUPs must be recovered and properly documented.

**Application Costs:** Program Manager reviews, application review, dialogue with application, payment processing, record completion

**Permit Costs:** Permit monitor (including OT, if needed), custodial needs

### Cost Recovery Exceptions:

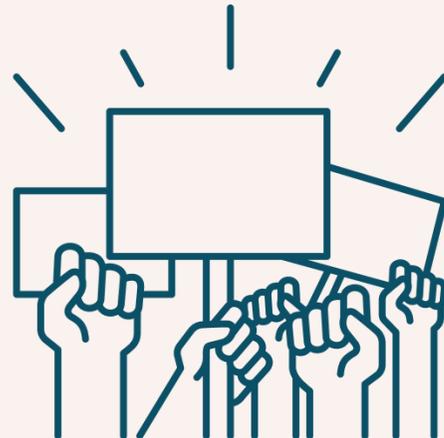
- First Amendment Activities
- Legal prohibitions
- In certain circumstances:
  - Government agencies
  - Park partners for mission-critical activities

# FIRST AMENDMENT EXPRESSION

Congress shall make no law respecting an establishment of **religion**, or prohibiting the free exercise thereof; or abridging the **freedom of speech**, or of the **press**; or the **right of the people peaceably to assemble**, and to **petition the Government** for a redress of grievances.

## PROTECTED ACTIVITIES

- Political speeches
- Religious services
- Public assemblies and demonstrations
- Collecting signatures
- Distribution of materials



## FIRST AMENDMENT SPECIAL USE PERMITS

### NOT REQUIRED

- Fewer than 25 participants
- No equipment or soliciting
- Occurs in designated area
- No existing SUP in area

### REQUIRED

- More than 25 participants
- Involves structures or soliciting
- Conflicts with existing permits

## KEY INFORMATION

- Speech is broadly protected under the constitution. Use careful judgment.
- Permits will be noted on the MABI/SAGA Reservations Calendar.
- Groups fewer than 25 people do not need to provide prior notice.
- When in doubt, inform your supervisor or Permit Office.
- Direct concerned visitors to First Amendment web pages or Permit Office.
- In an emergency, contact 911.

## HATCH ACT

- **On-duty** employees may **not** participate in First Amendment activities.
- **Off-duty** employees may participate in a personal capacity but must not imply official endorsement.

## DESIGNATED AREAS

All parks are required to have at least one designated First Amendment area.

### Marsh-Billings-Rockefeller

Lawn southeast of main entrance road, opposite the Carriage Barn Visitor Center

### Saint-Gaudens

Lawn south of Aspet

**01**

## **Build Knowledge**

- Training
- Research
- Networking
- Become subject matter expert
- Familiarize staff with programs and opportunities

**02**

## **Secure Foundation**

- Align policies and procedures with regional and WASO guidance
- Build program capacity

**03**

## **Nurture Partnerships**

- Connect with existing stakeholders
- Build trust through consistency and communication

**04**

## **Invite New Connections**

- Inform community of opportunities through marketing and outreach
  - CUA opportunities with increased visitor demands
  - STLs for events and ceremonies

**05**

## **Increase Revenue**

- Meet cost recovery minimums
- Inform local businesses about CUA opportunities
- Spread awareness about STL venues

# **Permit Program Goals 2025**

# COMMUNITY INSIGHT

## Balancing Revenue with Community Partnership Goals

As we strive to generate revenue through our permit program, how can we ensure that our partnership goals remain a priority?

What strategies or approaches have you seen work effectively?



# PERMIT PROGRAM GOALS

## *5 YEAR VISION*

- 2026** Prepare for new leasing opportunities at Blow-Me-Down Farm
- 2028** Increase partnership network with local businesses, stakeholders
- 2030** Establish parks as community 3rd place



## CHALLENGES

- Difficulties in connecting across programs/agencies
- Navigating the current changes and unknowns
- New policies may impact existing partnerships

## OPPORTUNITIES

- Growing community engagement through new permit opportunities
- Enhancing visitor experiences through partner collaboration
- Permits have less nuance than other program areas

# COMMUNITY INSIGHT

## Building Trust & Communication

As a subject matter expert, how do you effectively communicate new information and decisions to program managers and leaders?

What strategies have you found effective for politely saying *no* when dealing with requests that don't align with program or legal requirements?

What strategies have you found helpful in maintaining trust and transparency during these discussions?



# COMMUNITY INSIGHT

## Building Trust & Communication

Communication with and between regional and WASO offices can often be challenging.

Recognizing that staff are often spread thin, what strategies have you found effective for successfully reaching out and facilitating communication?



# COMMUNITY INSIGHT

## Leveraging Existing Relationships

How can we better utilize existing community relationships to foster new opportunities?

## Targeting Local Engagement

Are there community groups or stakeholders we might be overlooking in our partnership efforts?



**QUESTIONS?**

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