



# United States Department of the Interior

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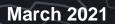
Dear Reader,

I would like to present for your review and comment the *Draft Business Plan for BLM Kanab Field Office Campgrounds*. Under the authority of the Federal Lands Recreation Enhancement Act (FLREA), the Bureau of Land Management (BLM) Kanab Field Office (KFO) manages two campgrounds in Kane County, Utah. The draft business plan covers management issues such as operating costs, fee rate changes, annual revenues, and future expenditures.

The Kanab Field Office proposes to increase camping fees for the public's use of the Ponderosa Grove Campground and group reservation site, and the White House Campground. The Federal Land Policy and Management Act (FLPMA) of 1976 authorizes the BLM to regulate the use of public lands, and the FLREA authorizes the BLM to collect recreational fees when sites and areas meet specific criteria. Use fees at the Ponderosa Grove campground are currently \$5 per site per night, with a group site rate of \$5 per night, plus \$1 per person per night. Use fees at the White House Campground are \$5 per site per night, with no group site. Fee rates at each of the campgrounds have not changed since the original business plans were created in 1999 (Ponderosa Grove Campground) and 2009 (White House Campground). To help offset operating costs, incorporate expanded amenities and to reduce dependency on appropriated funding sources, the BLM KFO proposes to increase fees at Ponderosa Grove and White House campgrounds. Fees for individual sites would be increased to \$12 per site per night at Ponderosa Grove and White House campgrounds. The fee for the Ponderosa Grove group site would be set at \$50 per night with a limit of 35 people.

The objective of the *Draft Business Plan for BLM Kanab Field Office Campgrounds, March 2021* is to provide you with information on how these public campgrounds are being managed and give you the opportunity to submit comments on the proposed fee structure at the Ponderosa Grove and White House campgrounds. Comments may be mailed to our office at: BLM Kanab Field Office, Attn: Daniel Gunn, 669 South Highway 89A, Kanab, UT 84741 or emailed to <a href="mailto:blm\_ut\_kn\_mail@blm.gov">blm\_ut\_kn\_mail@blm.gov</a>. Please list "Kanab Field Office Campground Program" in the subject line and provide any comments by February 28, 2021. Thank you for your interest and input in managing your public lands.

Sincerely, Whitney Bunting Field Manager Kanab Field Office





# Draft Business Plan for BLM Kanab Field Office Campgrounds



Photo of a recently-constructed campsite at the Ponderosa Grove Campground. October 15, 2020.

Paria River District/Kanab Field Office 669 S. Hwy 89A Kanab, Utah 84741 435-644-1200

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## Introduction

This draft Business Plan (Plan) has been prepared by the Bureau of Land Management (BLM) Kanab Field Office (KFO) within the Paria River District, located in southern Utah. The Plan applies to the administration and operation of two public-use fee campgrounds operated by the KFO and has been prepared to propose and analyze Recreation Use Permit (RUP) nightly individual campsite fee increases for the campsites at Ponderosa Grove and White House Campgrounds.

The proposed fee increase is necessary to align fee rates and operational costs with recent expansion and addition of amenities and deferred maintenance improvements performed at each of the campgrounds from 2019-2021. Improvements were made to address deferred maintenance needs and in response to trends of increasing public use. Developed campgrounds provide a valuable public service and help the BLM to meet objectives for resource and recreation management outlined within the 2008 Kanab Field Office Record of Decision and Approved Resource Management Plan (BLM-UT-PL-09-006-1610). Details of the improvements and a justification for the proposed fee increases are discussed in detail in the pages that follow.

Upon approval, this Plan would make the following changes:

- Increase the fee at Ponderosa Grove and White House Campgrounds from \$5.00/night to \$12.00/ night.
- Implement a fee of \$50/night for the Ponderosa Grove Campground Group Site with a maximum of 35 people.

# Business Plan - Purpose and Need

The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fee revenues and to provide the public an opportunity to comment on these objectives. Business plans are to assist management in determining the appropriateness and level of fees, cost of administering fee programs, outline expenditure of fees, and provide a structured communication and marketing plan. The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fee revenues and to provide the public an opportunity to comment on these objectives. The *Draft Business Plan for BLM Kanab Field Office Campgrounds* is subject to public review and comments will be considered prior to making any changes to the campground fee program.

# Background and Authorities

Numerous federal laws, regulations, and policies guide BLM management activities on public lands, with the most prominent laws being listed in this section. This Plan has been prepared to meet the criteria addressing the public use of federal lands and fee collection defined in the authorities and regulations listed below.

#### The Federal Land Policy and Management Act (FLPMA)

The Federal Land Policy and Management Act (FLPMA), 1976, [Public Law 94-579], contains BLM's general land use management authority over the public lands, and establishes outdoor recreation as one of the principal uses of those lands. Section 302 (b) of FLPMA directs the Secretary of the Interior to regulate through permits or other instruments the use of the public lands. Section 303 of FLPMA contains BLM's authority to enforce the regulations and impose penalties. The BLM began collecting fees for the

recreational use of public lands under the authority of the Federal Land Policy and Management Act of 1976.

#### The Federal Lands Recreation Enhancement Act (FLREA)

The Federal Lands Recreation Enhancement Act (FLREA), 2004, (Public Law 108-447), repealed applicable portions of the Land and Water Conservation Fund Act and replaced BLM's authority to collect recreation fees in 2004. This law authorizes BLM to collect recreation fees at sites that meet certain requirements, allows BLM to keep the fee revenues at the local offices where they were collected, and directs how BLM will manage and utilize these revenues. FLREA also established the America the Beautiful – The National Parks and Federal Recreational Pass Program.

The Federal Lands Recreation Enhancement Act of 2004 (FLREA) provides the BLM with its current authority to collect fees for short-term use of recreation facilities.

The FLREA authorizes the BLM to locally retain collected recreation fees and outlines how revenues may be used, for such things as facility repair, facility maintenance, facility enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, law enforcement related to public use and recreation, and operating or capital costs directly associated with the Recreation and Visitor Services Program.

#### Code of Federal Regulations (CFR)

The Code of Federal Regulations, at Title 43, Part 2930 (43 CFR 2930): Permits for Recreation on Public Land, contains the regulations governing BLM's recreation permitting programs.

KFO fee campgrounds are managed through the administration of the Recreation Use Permit Program using the Expanded Amenity Recreation Fee to fund campground maintenance, operation and the construction of new or expanded campground facilities. Ponderosa Grove and White House campgrounds have been recently upgraded to include the required amenities to qualify for the use of this fee (e.g., toilets, picnic tables, fire rings, tent/trailer spaces, access roads, collection of fees by an employee, reasonable visitor protection, and garbage collection).

#### BLM Mission, Policy and Guidance

The BLM's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. The BLM's goals for delivering recreation benefits from BLM-administered lands to the American people and their communities are:

- Improve access to appropriate recreation opportunities.
- Ensure a quality experience and enjoyment of natural and cultural resources; and
- Provide for and receive fair value in recreation.

The FLREA guidelines and the BLM 2930 Manual and Handbook require that each fee program have a business plan that thoroughly discusses fees and explains how fees are consistent with the criteria set forth in the Act.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> BLM Manual 2930 Recreation Permits and Fees (Rel. 2-296 dated October 22, 2007) requires that each recreation fee program have a business plan which thoroughly discusses fees and explains how fees are consistent with the criteria set forth in REA and other agency directives. Business plans assist management in determining appropriate fee rates, outline the cost of administering fee programs, and identify priorities for future fee program expenditures.

This Plan has been prepared pursuant to all applicable BLM recreation fee program policies and guidance, including:

- BLM Recreation Permits and Fees Manual 2930
- BLM Recreation and Fees Administration Handbook (2930-1 Handbook)
- BLM Utah Instruction Memorandum UT 2007-056: Fee Site Business Plan Development and Business Plan Outline
- BLM Utah Instruction Memorandum UT 2013-037: Utah Recreation Fee Program Toolbox

#### Secretarial Order 3347

This plan will assist the KFO in meeting the BLM's goals for delivering recreation benefits from BLM-administered lands to the American people and their communities by:

#### Modernizing Our Infrastructure

Development of this Plan directly support the Secretary's priority of *modernizing our infrastructure*, including Priority 8b: Remove impediments to infrastructure development and facilitate private sector efforts to construct infrastructure projects serving American needs; and Priority 8c: Prioritize DOI infrastructure needs to highlight: (1) Construction of infrastructure; (2) Cyclical maintenance; (3) Deferred maintenance.

#### Generating Additional Revenues to Support DOI & National Interests

This Plan considers the impact of DOI decisions on economic development and job creation through analysis of economic benefit of developed facilities and opportunities on federal lands relative to trends in public recreation use and facility maintenance needs.

#### Expanding Recreational, Hunting and Wildlife Conservation Opportunities

- Implement Secretarial Order 3347 to enhance conservation stewardship, increase outdoor recreation and improve the management of habitat, including for game species.
- Collaborate with State, Tribal, county, local and Federal agencies, as well as other partners, to identify and secure opportunities for increased recreation access to public lands.

#### Restoring Trust with Local Communities

This Plan directly aligns with the Secretary's Priority 3a: Be a better neighbor with those closest to our resources by improving dialogue and relationships with persons and entities bordering our lands, and Priority 3b: Expand the lines of communication with Governors, state natural resource offices, Fish and Wildlife offices, water authorities, county commissioners, Tribes, and local communities.

## Creating Jobs in the American Economy

This Plan directly aligns with the key initiative of creating jobs in the American economy by:

- Serving the American family by improving access to appropriate recreation opportunities
- Getting America back to work by providing jobs and promoting working landscapes
- Ensuring a quality experience and enjoyment of natural and cultural resources
- Providing for and receiving fair value in recreation

#### **BLM Land Use Plans**

#### Kanab Field Office Resource Management Plan

The proposed Plan and component proposed actions are in conformance with and implement aspects of the 2008 Kanab Field Office Record of Decision and Approved Resource Management Plan (BLM-UT-PL-09-006-1610).

#### Recreation Goals and Objectives

- Provide recreational activities in a variety of physical, social, and administrative settings, from
  primitive to near-urban, that allow visitors to have desired recreational experiences and enjoy
  the resulting benefits.
- Provide opportunities for visitor use and enjoyment of the area, consistent with resource capabilities and mandated resource requirements; provide for visitor education and interpretation of the recreational opportunities within the decision area.
- Provide for public health and safety through interpretation, facility development, and visitor management.

#### Recreation Management Actions

Ponderosa Grove Campground was in operation at the time that the KFO RMP was developed. It is included in the Moquith Mountain Special Recreation Management Area (SRMA), as part of the Non-Dunes Wooded Recreation Management Zone (RMZ). The RMP contains the following guidance pertaining to Ponderosa Grove Campground and the management of resources for recreation:

**Ponderosa Grove Campground**: No dumping of grey water or black water from RV units. No fires outside of established campsite fire grates. No digging of holes or pits.

Rec-10 Non-Dunes Wooded RMZ (14,000 acres)

Required Management (for the remainder of the Non-Dunes Wooded RMZ):

Facilities: Provide support facilities for recreation experience.

**REC-15** Develop recreation sites and facilities needed to accommodate users, facilitate recreational users of public lands, and protect resources.

**REC-18** No person or persons should occupy one area on BLM lands within the decision area for longer than 14 consecutive days in any 28-day period; however, extensions beyond the 14-day length of stay could be authorized for permitted uses on a case-by-case basis. Any site on public land within 30 air miles constitutes the same area for the purpose of this management decision.

- **REC-21** Design facilities to be compatible with the local landscapes and recreation experience.
- **REC-23** Developed recreation sites will be recommended for withdrawal from mineral entry, closed to mineral disposal, and open to oil and gas leasing subject to major constraints (NSO).
- **REC-24** Developed recreation sites will be fenced to exclude grazing use.
- **REC-26** Allow dispersed camping throughout the decision area without permit, unless specified in the plan.
- **REC-27** Limit vehicle parking for dispersed camping within 150 feet of designated routes.
- **REC-42** Limit camping associated with [Special Recreation Permits] to areas beyond 200 feet of riparian areas unless specific campsites are required during permitting. Approval of these specific campsites would be considered on a case-by-case basis.
- **Rec-15** Develop recreation sites and facilities needed to accommodate users, facilitate recreational uses of public lands, and protect resources.
- **Rec-21** Design facilities to be compatible with the local landscapes and recreation experience.

**Rec-28** Provide information regarding recreation opportunities, interpretation of natural and human history, and specific rules and regulations pertaining to use of public lands to visitors

#### Kanab-Escalante Planning Area (KEPA) Resource Management Plan

The proposed Plan is in conformance with and implements aspects of the *Grand Staircase-Escalante* National Monument and Kanab-Escalante Planning Area Proposed Resource Management Plan and Final Environmental Impact Statement, October 2019, (DOI-BLM-UT-0000-2018-0008-RMP-EIS) and the Record of Decision and Approved Resource Management Plan for the Kanab-Escalante Planning Area, February 2020:

## Recreation and Visitor Services Goals and Objectives (KEPA)

**Goal 1:** Provide recreational activities in a variety of physical, social, and administrative settings, including near-urban, which allows visitors to have desired recreational experiences and enjoy the resulting benefits.

#### Objectives:

- Manage SRMAs and RMZs for the distinct, primary recreation-tourism market for which they were created as described in Appendix G (Recreation Management Areas).
- Manage use through a range of tools, such as permits, allocations, designated recreation sites, etc.
- **Goal 2**: Provide opportunities for visitor use and enjoyment of the area, consistent with resource capabilities, and mandated resource requirements.

#### Objectives:

- Provide visitor education and interpretation of the recreational opportunities within the Decision Area.
- Maintain or improve important recreational values and sites in Federal ownership to ensure a continued diversity of recreation activities, experiences, and benefits.
- Provide educational interpretation of cultural and paleontological resource sites.
- Provide for public health and safety through mapping and information, facility development, and visitor management.
- Manage user conflicts between recreation and other resources and uses (e.g., livestock grazing).
- Manage recreational areas and project objects and resources containing significant scenic, natural, and cultural values as well as areas with scientific importance.

#### Recreation and Visitor Services Management Actions and Allowable Uses (KEPA)

Whitehouse Campground was in operation at the time that the February 2020 Kanab-Escalante Planning Area Approved Resource Management Plan was developed. The RMP contains the following management actions pertaining to Whitehouse Campground:

- **REC-4** Create campgrounds or designated dispersed camping areas to support management goals and objectives for other resources.
- **REC-5** Develop new parking lots, restrooms, and other recreation facilities along open travel routes or other appropriate areas.

- **REC-12** Prohibit target shooting within at least 0.25 mile of residences, campgrounds, and developed recreation sites and areas, or greater depending on area-specific conditions.
- REC-15 Prohibit camping in alcoves, adjacent to rock art sites, and within historic or prehistoric sites listed or eligible for listing on the NRHP. Additional camping restrictions may be included in SRPs to reduce or eliminate impacts on archaeological sites.

#### Extensive Recreation Management Area Objectives (KEPA)

The campground is within the Kanab-Escalante Planning Area Extensive Recreation Management Area (ERMA). The RMP contains the following objectives pertaining to the management of the ERMA and White House Campground: "The Kanab-Escalante ERMA will offer recreation opportunities in a relatively unchanged physical recreation setting that facilitate the visitor's freedom to participate in a variety of dispersed, developed, motorized, non-motorized, mechanized, and non-mechanized recreation activities. The ERMA designation encompasses the four planning units (Grand Staircase, Kaiparowits, and Escalante Canyons Units and KEPA) identified in Presidential Proclamation 9682. While recreation would not be the specific management focus throughout the ERMA, recreational resources and values would be managed commensurately with other resource areas to accommodate a variety of multiple uses that support the health and productivity of the land. It is important to note that in some cases recreation opportunities may be constrained by decisions to benefit other resources."

# Kanab Field Office Campground Program

#### Administrative Unit

The Bureau of Land Management, Kanab Field Office of the Paria River District, is the administrative unit for the Ponderosa Grove and White House Campgrounds. The Kanab Field Office manages approximately 1,415,974 surface acres of public land in south-central Utah, spread between Kane and Garfield Counties. The Kanab Field Office is located in Interior Region 7. The maps below (Figures 3 and 4) show the location of each of the campgrounds administered by the BLM KFO.

#### Kanab Field Office Recreation Program and Visitation

The KFO manages a diverse recreation program that includes developed and dispersed opportunities for off-highway vehicle (OHV) use, hiking, horseback riding, bicycling, camping, picnicking, hunting, antler collecting, sightseeing, photography, rock climbing, and canyoneering. Historical and cultural uses of KFO lands include woodcutting, ranching, tourism, mining, seed collection and other outdoor recreational opportunities.

The slot canyons, slick rock formations, and colorful sand found in the Kanab area are highly sought after by local, national, and international visitors. The National Parks, National Monuments, National Forests, Wilderness Areas, and other recreational opportunities surrounding Kanab attract visitors from all over the world, who recreate both privately and by hiring permitted commercial outfitters.

Table 1 displays the average number of recreation visits over the past ten years to the Kanab Field Office and Paria Canyon-Vermilion Cliffs Special Management Area.

Table 1: Visits to Kanab Field Office		
Year	Visits to Kanab Field Office	
2020	316,126	
2019	311,861	

2018	289,882
2017	448,901
2016	434,654
2015	385,442
2014	346,938
2013	342,338
2012	272,572
2011	235,801

Source: BLM RMIS Database

Due to the remoteness of many sites and the expansiveness of the backcountry within the KFO, it is likely that visitation is higher than what has been recorded. Traffic counters, Recreation Use Permits, Special Recreation Permits, day use permits, and visitor logs are used to record visitor data in high use areas.

Visitor demographics, such as where visitors originate, were collected in a National Visitation Use Monitoring (NVUM) study prepared by the U.S. Forest Service for the Kaibab (2015) and Dixie (2019) National Forests.<sup>2</sup> Kanab is approximately one hour or less from each forest, so the visitor data shown in figure 1 is assumed applicable. Results from this survey indicate that the great majority of recreation visitors to KFO travel large distances.

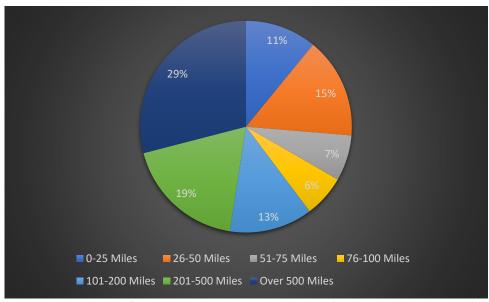


Figure 1 - Percent of BLM Visits by Distance Travelled (NVUM, 2015 and 2019)

<sup>&</sup>lt;sup>2</sup> National Visitor Use Monitoring Program | US Forest Service (usda.gov)

Recreation visitors to the KFO BLM area have a higher-than-average income profile than the population at large. This is illustrated in the following chart (figure 2), derived from the 2015 and 2019 National Visitor Use Monitoring Surveys (NVUM) completed on adjacent federal lands administered by the US Forest Service:

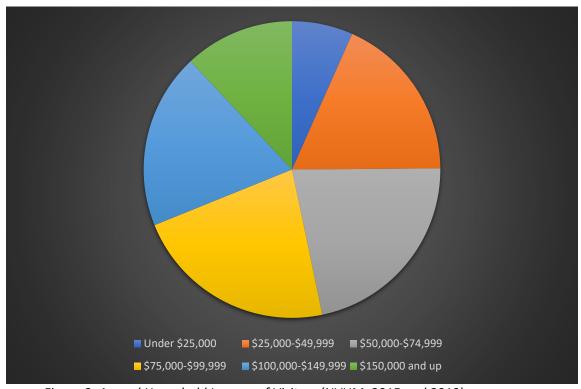


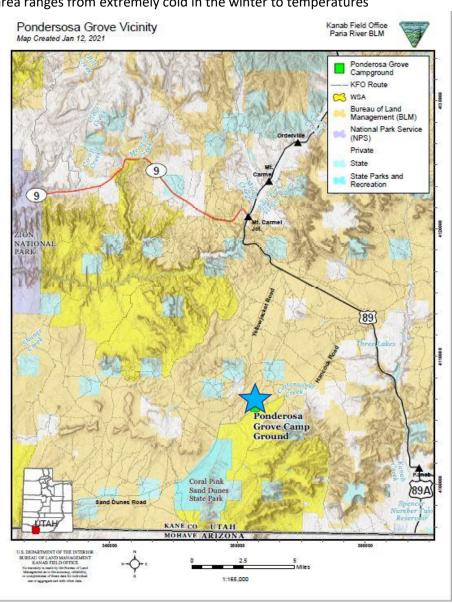
Figure 2: Annual Household Income of Visitors (NVUM, 2015 and 2019)

# Description of Existing Fee Sites, Proposed Fee Changes and Infrastructure Updates Ponderosa Grove Campground – General Setting and Background

The Ponderosa Grove Campground is situated approximately eight miles to the northwest of Kanab, Utah, (map 1) at 6,300 feet in elevation and is named for the small canopy of ponderosa pine trees that shade its campsites. The climate in the area ranges from extremely cold in the winter to temperatures

over 100 degrees Fahrenheit during the summer months. The campground sits amid rolling sagebrush and scrub hills which form the top of the Vermilion Cliffs and a short distance to the north of the Coral Pink Sand Dunes. Views of the surrounding landscape include the White Cliffs and colorful pink cliffs of the Bryce geologic formation. The area contains a variety of wildlife including mule deer, raptors, covotes, rabbits, quail, etc. Tourism and recreation are a growing and important component of the local economy. Ponderosa Grove Campground was designed and constructed in the 1970's. As the adjacent sand dunes became a popular off-highway-vehicle (OHV) destination, OHV enthusiasts became frequent users of the campground. The campground is located on approximately sixteen acres of public lands managed by the BLM.

In 2020 the campground was expanded and remodeled in response to increasing public visitation and demand for recreational opportunities. Prior to the expansion, the campground consisted of a gravel loop road, 9 campsites (with tent pads and picnic tables), an incorrectly installed and



Map 1 - The Ponderosa Grove Campground is located approximately 8 miles NE of Kanab, Utah.

aging double-vault restroom and BBQ grills. Construction efforts to expand amenities at Ponderosa Grove Campground began in August 2020 (figure 3) and included the addition of 26 car-camping sites (including gravel tent platform, parking barrier, fire ring and compacted gravel parking area), 6 RV sites, 2 walk-in campsites (including parking area and gravel tent platform), compacted gravel loop road, cattle guard, dumpster with enclosure, and a reservable group camping area for up to 35 people

(including 2 car/RV sites, locking gate, group fire pit, shade pavilion w/ barbeque grill, double vault restroom and parking stalls for 13 vehicles). Construction is scheduled to be completed in 2021, following installation of the shade pavilion, barbeque grill and group fire pit.

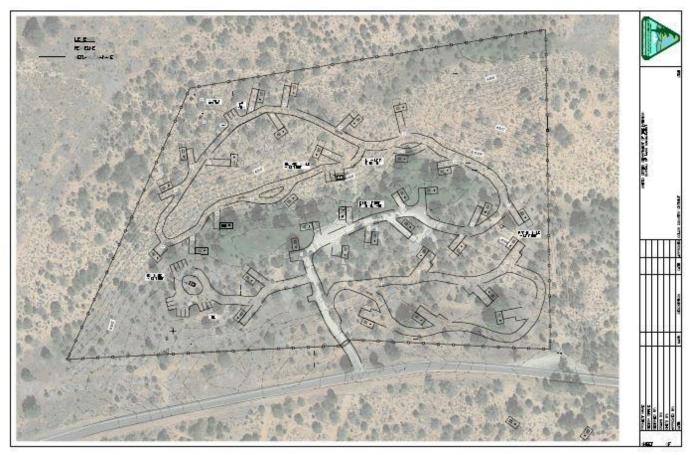


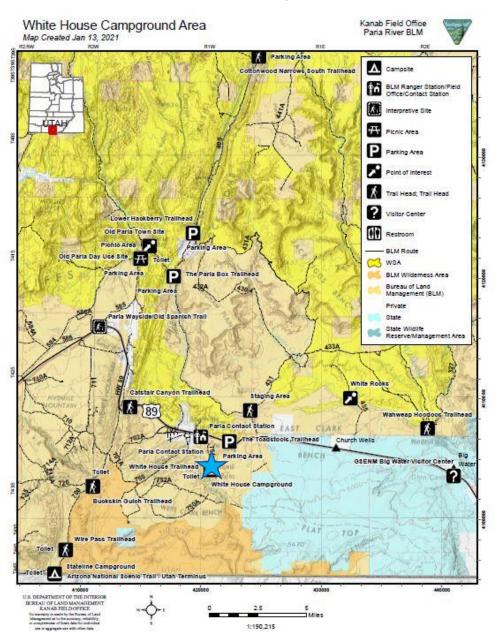
Figure 3 - Conceptual drawing of improvements to Ponderosa Grove Campground, August 2020

#### White House Campground – General Setting and Background

White House Campground is located approximately 43 miles east of Kanab, Utah, two miles to the south of Highway 89 and the Paria Contact Station, at the end of Monument Road 751 (map 2). The

campground sits in a broad valley between the Paria River and scenic white-grey sandstone buttes. The campground was constructed in the 1970s, and, until it was reconstructed (2017-2019), was combined with a trailhead accessing the Paria Canyon-Vermilion Cliffs Wilderness. The campground has been primarily used by hikers and backpackers as a staging area for trips into the Paria Canyon-Vermilion Cliffs Wilderness, which is jointly managed by the KFO, Grand Staircase-Escalante National Monument (GSENM), and Vermilion Cliffs National Monument (VCNM).

Prior to reconstruction (2017-2019), the campground contained 5 walk-in, tent-camping sites. An improvement and expansion project that began in 2017 established a separate trailhead area, increased the total number of campsites and improved facilities. Seven additional carcamping sites (including parking areas and tent pads) were constructed. Gravel and post and rail fencing were installed in to define boundaries of campsites and parking areas and to prevent negative effects to soil and vegetation from vehicle use and foot traffic. Trailhead infrastructure was separated from the campground



Map 2 – White House Campground is located approximately 45 miles to the east of Kanab, Utah and approximately 16 miles to the west of Big Water, Utah.

and developed in an adjacent area to avoid user conflicts. Existing toilet facilities (dating back to 1992) were removed and replaced with 2 ADA-compliant vault toilets. A new fee station, informational kiosk, and cattleguard were also installed. Picnic tables and fire rings were installed at each of the 12 campsites. Additionally, erosion from a major flood event in late 2015 necessitated that the access road be moved and reconstructed. As a result of the recent project, use of the campground by visitors

camping in recreational vehicles or out of their cars has increased. All 12 campsites sites are for individual use; the campground does not have any group sites.



Figure 4 - Aerial view of White House Campground during re-construction- 2018

Table 2: Campgrounds within Kanab Field Office				
Campground Name	Current Site Fees	Location	# of Individual Sites	Number of Group Sites
Ponderosa Grove	\$5.00 per night	Hancock Road	35	1
White House	\$5.00 per night	East Highway 89	12	0

#### **Campground Visitation**

Campground visits in the Kanab Field Office are measured through Recreation Use Permits (RUP) fee envelopes, which visitors use to register and pay the fee upon their arrival at the campground. The number of people is recorded on these envelopes, which allows the BLM to determine the number of visitors to the campground each year.

Ponderosa Grove Campground primarily serves recreators visiting the Grand Staircase—Escalante National Monument, Coral Pink Sand Dunes, Zion National Park, Best Friends Animal Sanctuary, and the Kanab Field Office. Recreation activities that visitors utilize in the area include sightseeing, riding ATV/UTV's, hiking, photography, horseback riding, hunting, and climbing/rappelling.

White House Campground serves visitors to the Grand Staircase-Escalante National monument and the Vermilion Cliffs National Monument. Recreation activities in this area primarily include sightseeing, photography, hiking, and backpacking.

To meet an increased demand for camping opportunities within the Kanab Field Office, improvements to the White House Campground were completed in 2019, and the expansion of the Ponderosa Grove Campground is scheduled to be completed in 2021.

Table 3: Ponderosa Grove Campground Visitation		
Year	Number of Campsite Permits	Number of Total Campers
2020	1171	2987
2019	1914	4880
2018	1440	3672
2017	1555	3964
2016	1355	3455

Source: BLM RMIS Database

Table 4: White House Campground Visitation		
Year	Number of Campsite Permits	Number of Total Campers
2020	883	2120
2019	1146	2751
2018	2030	4873
2017	1134	2721
2016	925	2221

Source: BLM RMIS Database

#### Proposed Recreation Fee Rates

The Ponderosa Grove Campground Recreation Fee Demonstration Site Business Plan was signed in December 1999, establishing the fee structure for Ponderosa Grove Campground (See Table 5). The Paria Canyon/Coyote Buttes Recreation Fee Demonstration Site Business Plan was signed in September 1997, establishing the fee structure for White House Campground. In the years since, the KFO and GSENM have jointly administered the Recreational Use Permit (Expanded Amenity) Fee Program at White House Campground. Fee rates at both campgrounds have remained unchanged since their establishment.

The KFO currently supports operational costs to maintain campground facilities using a combination of funds from FLREA accounts (fee-generated revenues) and federal appropriations. However, increases in visitation to the KFO have increased facility maintenance needs and the demand for developed camping opportunities. As a result, in these funding sources are insufficient. Annual revenues generated at each site only cover a fraction of the operating and labor costs. The remainder of annual operating and labor costs have been covered by appropriated funds and revenue generated through administration of Special Recreation Permits. The proposed fee increases will help to fund annual operating costs at each site and will help to avoid dependence upon availability of appropriated funds or other fee accounts. The fees proposed for Ponderosa Grove and White House Campgrounds are lower than other similar expanded-amenity sites in Kanab and the surrounding area (Table 12). The increase in fees will help offset the cost of ongoing maintenance and upkeep of the campgrounds, allowing the Kanab Field Office to maintain visitor services at a sustainable level.

Table 5: Existing and Proposed Fees			
Campground	Current Fee	Proposed Fee	
Ponderosa Grove	\$5 per night	\$12 per night per individual site	
Ponderosa Grove (group site)	\$5 per night, plus \$1 per person per night	\$50 per night up to 35 people	
White House	\$5 per night	\$12 per night	

## **Operating Costs**

The Kanab Field Office employs four separate contracts to address maintenance of restroom facilities. Two of the contracts provide restroom cleaning and maintenance services; one for the Paria Canyon/Vermilion Cliffs area, and another for the remainder of the Field Office. The other two contracts provide vault-toilet pumping services, usually performed 1-2 times per year at each of the campgrounds. All four of the contracts are held by local vendors.

The largest maintenance expense is the bi-weekly cleaning of toilets/facilities. In addition to cleaning the restroom from top to bottom, the cleaning contract includes buying toilet paper, hand sanitizer, and cleaning supplies. The annual cost of the cleaning contract for Ponderosa Grove Campground is \$6,786. The annual cost of the cleaning contract is \$10,800 at White House Campground. Currently, only a fraction of the total cost to operate the Ponderosa Grove and White House Campgrounds is funded from the relative FLREA 1232 accounts. Historically, most funds required to operate the campgrounds has come from appropriated funding. (See Tables 6-9) KFO intends to utilize 1232 FLREA funds from fees generated at each of the campgrounds to offset a greater percentage of costs associated with operation and maintenance of the campgrounds, as this aligns with directives guiding the collection and expenditure of recreation fees.

Table 6: Annual Labor Costs for Ponderosa Grove Campground		
	Appropriations	
Position	Workdays Per Year	Approximate Cost
Kanab Field Office Manager	6	\$2,937
Kanab Field Office Assistant	15	\$6,175
Manager		
Outdoor Recreation Planner	24	\$8,242
Law Enforcement Ranger	13	\$4,464
Park Ranger	104	\$27,364
Recreation Intern	34	\$3,536
Visitor Information Assistant	52	\$9,742
Coral Pink Sand Dunes State	26	\$2,500
Park Ranger		
(Security/Monitoring)		
Kane County Sheriff Deputy	26	\$5,200
(Security)		
Volunteer	13	\$442
Total*		\$70,602

Table 7: Annual Labor Costs for White House Campground		
	Appropriations	
Position	Workdays Per Year	Approximate Cost
Kanab Field Office Manager	6	\$2,937
Kanab Field Office Assistant	15	\$6,175
Manager		
Outdoor Recreation Planner	24	\$8,242
Law Enforcement Ranger	13	\$4,464
Wilderness Park Ranger	52	\$12,030
Park Ranger	52	\$9,742
Recreation Intern	34	\$442
Visitor Information Assistant	52	\$9,742
Kane County Sheriff Deputy	26	\$5,200
(Security)		
Volunteer	52	\$1,768
Total		\$60,742

Table 8: Annual Operating Cost for Ponderosa Grove Campground		
Expenditures	Approximate Annual Costs	
Restroom Cleaning Contract	\$13,050 (Increases approximately \$2.40 a unit every year)	
Restroom Pumping Contract	\$2,600	
Fee Collection	\$2,570	
Maintenance/Infrastructure	\$10,000	
Repairs		
Total	\$28,220	

<sup>\*</sup>Does not include additional funds (\$8,908.68) used in FY2020 from UT20 that was contributed towards cost of campground expansion.

Table 9: Annual Operating Cost for White House Campground	
Expenditures	Approximate Annual Costs
Restroom Cleaning Contract	\$10,800
Restroom Pumping Contract	\$1,300
Fee Collection	\$3,000
Maintenance/Infrastructure	\$3,500
Repairs	
Total	\$18,600

<sup>\*</sup>Does not include use of additional funds (\$96,000) from appropriations (Deferred Maintenance) or FLREA 1232 accounts for re-design and improvements implemented in 2017 and 2018.

#### Revenues

Tables 10 and 11 provide an estimated projection of revenues. Estimated Revenues (assuming fee increase) is based on 66% capacity at the campground from March to October (busy season) and 10% capacity November through February (typically the slow season). Estimated Revenues (assuming fee increase), Labor Expenses, and Operation Expenses were based on a 1.5% inflation rate. The 1.5% inflation rate was based on the United States average 1.2% and Utah's 2.1% inflation rate. Estimated

Revenues (with no fee increase) were based on the annual visitation trend increase in the Kanab area of approximately 2%.

Table 10: Ponderosa Grove Annual Expenditures vs. Estimated Revenues in Campground Program					
Year	Estimated Revenues (assuming fee increase)	Estimated Revenues (with no fee increase)	Ponderosa CG Staff Labor Expense	Operations Expense	Total Annual Expenditures
2021	\$75,140	\$8,435	\$70,602	\$28,220	\$98,822
2022	\$76,267	\$8,585	\$71,661	\$28,643	\$100,304
2023	\$77,411	\$8,740	\$72,735	\$29,072	\$101,807

Table 11: White House Total Annual Expenditures vs. Estimated Revenues in Campground Program					
Year	Estimated Revenues (assuming fee	Estimated Revenues (with no fee	Labor Expenses	Operations Expenses	Annual Expenditures
	increase)	increase)			
2021	\$26,910	\$6,120	\$60,742	\$18,600	\$79,342
2022	\$27,313	\$6,245	\$61,653	\$18,879	\$80,532
2023	\$27,722	\$6,370	\$62,577	\$19,162	\$81,739

#### Priorities for Future Expenditures

The priorities for future expenditures for the Kanab Field Office Campground program are as follows:

- Continue to provide facility maintenance services
- Consider improvements that would benefit visitors and meet BLM management objectives
- Maintain FLREA fund account balances of 50-100% for operations, maintenance and staff labor

#### Future Expenditures for On-going Program Services

Priority expenditures for the campground program include all aspects of maintaining current levels of service to campers in both individual and group campsites. The campgrounds are maintained to a standard of cleanliness that promotes visitor health and safety and a positive recreation experience. These services include administering group site reservations, law enforcement and park ranger patrols of the campgrounds, fee collections, government vehicle costs, and regular maintenance of the campground facilities (e.g., toilet cleaning and pumping, fire rings, picnic tables, tent pads, roads, shade shelters, and fencing.

#### Future Expenditures for Program Infrastructure

Planned expenditures to support the KFO campground program include:

#### **Ponderosa Grove Campground**

- Develop and install informational/interpretive panels for entrance kiosk \$1,500
- Construct group site shade pavilion and group fire pit \$50,000
   \*These improvements will be constructed using deferred maintenance funds

#### **White House Campground**

Purchase and install shade structures at the 7 car-camping sites - \$70,000

\*These improvements will be funded using FLREA fee account revenues or deferred maintenance funds

#### Revenues Necessary to Maintain Program Services

Projected expenditures include those necessary for continued program operations, maintenance and minor improvements. The KFO would continue to manage, monitor and maintain the remodeled and expanded campgrounds through a combination of federally appropriated funds, deferred maintenance funds, and FLREA fee account revenues.

#### Analysis of Recreation Fee Rates

BLM policy authorizes the use of either a cost-recovery or fair market calculation method to analyze proposed fee rates. The KFO is using a fair market comparison to support the need to establish fees at its campgrounds.

Table 12 compares fees charged at public campgrounds locally and regionally for individual and group camping that offer similar amenities to the KFO campgrounds. The table uses federal and privately owned campgrounds for comparison.

## **Explanation of Current Fee Structure**

The Ponderosa Grove and White House campgrounds are surrounded by Zion National Park, Bryce Canyon National Park, the Coral Pink Sand Dunes State Park, the Grand Staircase-Escalante National Monument, Vermilion Cliffs National Monument, Grand Canyon National Park - North Rim, Glen Canyon National Recreation Area, and several National Forests. Both campgrounds are used by visitors travelling to or from these other popular destinations as well as by visitors that come to recreate on the Kanab Field Office. Currently, visitors are asked to pay \$5.00 per night to stay at either Ponderosa or White House campgrounds. The KFO campgrounds are the most affordable developed campsites in the surrounding area, even if the proposed fee increase of \$12 were implemented.

#### Fair Market Value Fee Calculation

The fee rates proposed in this business plan were offered as a comparison against comparable fees charged elsewhere, including other public agencies and nearby private sector operators.

Table 12: A Comparison of Campground Fees in the Kanab Area (2020)					
Campground Name Agency		Campground Fee(s) per Night	Amenities Offered		
Public Campgrounds					
Ponderosa Grove Campground	Bureau of Land Management	\$5 per site	Picnic tables, car camping/RV sites with parking stalls, gravel		
Campground	Widilagement		tent pads, pit toilets, fire rings,		
			dumpster, group site with shade		
			structure, group fire pit and grill, walk-in tent camping sites.		
White House	Bureau of Land	\$5 per site	Picnic tables, gravel tent pads,		
Campground	Management	yo por site	vault toilets, fire pit, walk-in-tent		
			camping sites.		
Dixie National Forest	Forest Service	\$9 per site + \$4 per additional	Picnic tables, fire grills, water,		
(Blue Spruce)		vehicle	and vault toilet		

Campground Name	Agency	Campground Fee(s) per Night	Amenities Offered
Dixie National Forest	Forest Service	\$13 per campsite, plus \$8 for	Picnic tables, fire rings/grills, bear
(Posey Lake)	1 Orest Service	additional vehicles.	box, water, vault toilet
(1 Osey Lake)			box, water, vauit tonet
		\$50 for group sites up to 35	
		people.	
Zion National Park	National Park	\$20 per site +\$10 reservation	Picnic tables, fire grills, water,
(Watchman)	Service	fee.	trash, parking spaces, flush
		\$30 for electric sites. \$50-\$130	toilets, electric, camp host
		for group sites.	
Zion National Park	National Park	\$20 per site.	Picnic tables, fire grills, water,
(South Campground)	Service	\$50 per group site.	trash, parking spaces, flush
, , ,			toilets, dump station, camp host
North Rim of the Grand	National Park	\$18-\$25 per site +\$10	Picnic tables, fire grills, water,
Canyon	Service	reservation fee.	flush toilets, dump station, coin
Carryon	SCI VICC	\$50 per group site up to 25	laundry, showers, parking, camp
		people.	host
Namela Dina af tha Cuand	National David	• •	
North Rim of the Grand	National Park	\$22 per site.	Picnic tables, fire grills, tent pad,
Canyon (DeMotte)	Service		vault toilets, water, firewood,
			trash, camp host
Coral Pink Sand Dunes	Utah State Park	\$25 per single site with no	Picnic tables, fire grills, water,
		hookups.	trash, parking spaces, dump
		\$50 for double sites with no	station, showers, flush toilet,
		hookups.	phone service, shade shelters,
		\$40 per single site with water	tent pads
		and electric.	
		\$150-\$175 per night at group	
		sites.	
Kodachrome Basin	Utah State Park	\$25 per standard site with ho	Flush and vault toilet, showers,
Roddelli Offic Basili	otan state rank	hookups.	picnic tables, fire rings/grills,
		\$35 per full hookup site. \$16 for	trash, power
			trasii, powei
		additional vehicles.	
		\$75 for group site, 15 vehicles	
		max. \$16 per vehicle after 10	
		vehicles.	
Red Canyon	Forest Service	\$20 per site.	Picnic tables, fire pits/grills,
Campground		\$40 per group site.	drinking water, flush and vault
		\$6 per extra vehicle.	toilets, showers, dump station,
		\$4 for day use area.	garbage disposal
		\$25 for group site up to 50	
		people.	
		\$100 for 51-100 people.	
		,	
	Pı	rivately Owned Campgrounds	
Kaibab Camper Village	Private	\$20 per site.	Electric, water, sewage, picnic
Kaibab Camper Village	Private	\$20 per site. \$6.00 per person at group site.	Electric, water, sewage, picnic tables, fire grills, toilets, outside

ampground Name Agency Campground Fee(s) per Night		Amenities Offered	
Hitch-N-Post RV Park	Private	\$23 per tent site. \$40 per RV site. Rates are based on two guests, each additional guest costs \$2.00 a night. Electric is an additional \$2.00 per night.	Electric, picnic tables, and showers. Additional costs for firewood, RV dump, RV water fill, dump and fill, walk-in showers.
Paria River Ranch	Private	\$12 per person per site	Picnic tables, fire grills, water, coin laundry, restrooms showers, horse stables.
Zion Ponderosa Ranch	private	\$12 per person per site	Picnic tables, fire grills, showers, coin laundry, Wi-Fi. Minimum of a two-night stay.
Bryce Zion Campground	Private	\$40 per tent site with no hookups. \$42 per tent site with electric. \$65 for deluxe tent site. \$42-\$48 per pull through RV site. Additional guests after two, \$3.50 per person. Kids eight and under are free.	Coin laundry, laundry, showers, flush toilets, picnic tables, fire ring/grill,

Many of the privately-owned campgrounds that offer tent camping opportunities offer expanded amenities beyond those available at Ponderosa and White House campgrounds.

# Effects of Increasing or Not Increasing Recreation Fee Rates

The following is an analysis of potential impacts or conditions that could develop from both increasing fees and not increasing fees at the Kanab Field Office Campgrounds:

## Effects of Increasing Fees

#### Effects to Recreational Users

There is increased demand for camping experiences on BLM lands, and the increase of fees at these sites would allow the facilities to be more self-sustaining.

An increase in fees would help to counter potential agency budget restrictions and allow the KFO to continue to fund annual campground operating costs, without reliance upon appropriated funds, which can fluctuate from year to year. This is especially important regarding the agency's ability to continue to fund the restroom cleaning contracts for each campground. These services increase public health and safety at the campgrounds and improve visitor experience.

Developed campgrounds provide services that fulfill the BLM's national priorities of serving the American family with high-quality, meaningful outdoor experiences. Campground facilities (e.g., restrooms, trash receptacles) also help to protect resources in other locations throughout the KFO by decreasing the potential for negative effects to resources from human waste and refuse. An increase in fees commensurate with available amenities would ensure that funds are available to provide for routine maintenance and replacement of infrastructure. The potential for lapses in maintenance cycles

or backlogs of deferred maintenance projects due to lack of funding would be decreased. As a result, visitor experience, satisfaction and health and safety would be improved. The fee increase would allow visitors to continue to enjoy a quality recreation experience at a fair market value.

A fee increase at the campgrounds would result in benefits to recreational users:

- The campgrounds provide an alternative to dispersed camping or hotel stays at a rate that is lower than other campgrounds in the local area.
- BLM would have the ability to address maintenance needs at the campgrounds, supporting health and safety and visitor experience/enjoyment.
- Improved public lands facilities would be made available to the public (e.g., clean restrooms)
- Visitors have a focused opportunity to enhance outdoor skills, build group and family relationships, and introduce youth to the world of nature.

#### Effects to the Local Economy

The Kanab Field Office campground program supports BLM's national priority of restoring trust and being a good neighbor by providing high-quality camping experiences that draw visitors to Southern Utah from around the world. Visitors purchase supplies and services (e.g., gas, food, equipment rentals, guide services, etc.) from retailers within the surrounding local communities, including Kanab, Big Water, Orderville, Mount Carmel, Panguitch, and Fredonia, AZ. Revenue from the proposed fee increases would allow the KFO to provide exceptional camping opportunities and other recreation experiences for visitors. Facilities that meet the needs of visitors are likely to continue to attract visitation and result in an economic benefit to local communities and economy.

#### Effects to the Environment

Visitation to public lands with the KFO continues to increase. The availability of maintained campgrounds may decrease negative effects to the environment from the creation of dispersed camping sites and the accumulation of human waste. Developed campground facilities provide the BLM with opportunities to reduce the amount of human waste, trash, fire pits, and other resource damage on the land that it manages. An increase in funds available to maintain campground facilities would help to avoid the use of funding or workforce from other program areas, preventing negative effects to resources beyond the immediate scope of the campground program.

#### Socioeconomic Effects, including Low-Income Populations

The Socioeconomic data on BLM camping is unknown; however, based upon the 2015 and 2019 National Visitor Use Monitoring (NVUM) surveys completed on Forest Service-administered land in the surrounding area, visitors who vacation away from home are more likely to have an above-average income. Alternatively, the campgrounds provide a low-cost alternative to hotel stays in southern Utah communities at a rate that is lower than comparable campgrounds managed by the BLM. Meaningful effects to low-income populations are not expected, as low-income populations are not heavily represented in the area (as identified in2015 and 2019 NVUM surveys) and there are abundant opportunities for dispersed camping on the BLM land surround the Kanab Field Office campgrounds.

#### No Fee Increase

#### Effects to Recreational Users

The current fee structure does not allow BLM to fully fund annual operating costs and does not support the replacement of facilities as they deteriorate or if they are damaged. If campground fees were not increased, additional revenue would not be available for routine maintenance or replacement of

infrastructure. This may lead to lapses in maintenance cycles or backlogs of deferred maintenance projects, resulting in diminished visitor satisfaction, health and safety.

#### Effects to the Local Economy

Not increasing the campground fees could lead to the erosion of services such as cleaning and maintaining the sites. Sites that are infrequently or not adequately maintained could result in visitor decisions to recreate elsewhere. Should visitors choose not to recreate in the Kanab Field Office, the local economy could be negatively affected.

#### Effects to the Environment

Dispersed campsites are common and have potential negative impacts to wildlife, riparian resources, water quality, flood plains, cultural resources, and the recreation experience of visitors. The availability of developed and maintained campgrounds help to prevent resource damage and negative impacts to the environment. Ensuring that maintained public facilities are available for camping purposes provides an alternative to dispersed camping and centralizes visitor activity within a developed and managed site. If fees were not increased, the BLM would have a reduced ability to ensure that campground facilities are maintained. Visitors may be less likely to stay in KFO campgrounds and may decide to camp in undeveloped sites. Lack of sufficient funds to maintain campground facilities may necessitate the use of funding or workforce from other program areas. As a result, resources beyond the immediate scope of the campground program may be negatively affected.

#### Socioeconomic Effects, Including Low-Income Populations

If fees were not increased, campground facilities may not be adequately maintained. High quality recreation experiences and increased visitor satisfaction made possible through the increase of campground fees would not be available.

#### Public Outreach

Draft business plans must be made available for public review and comment for a minimum of 30 days. Prior to implementing new fees, the KFO will conduct the following outreach efforts to notify the public of its opportunity to review and comment on the draft business plan:

- The Draft Business Plan for BLM Kanab Field Office Campgrounds will be posted to the website <a href="https://www.blm.gov/programs/recreation/permits-and-fees/business-plans">https://www.blm.gov/programs/recreation/permits-and-fees/business-plans</a> web site for 30 days from 01/29/2021 to 02/28/2021.
- A copy of the draft business plan will be made available at the Kanab Field Office and Grand Staircase-Escalante National Monument Headquarters.
- KFO will present the draft Plan and proposed fee increase to the BLM Utah Recreation Resource Advisory Council (RAC) for a formal review on 03/02/2021. The Utah RAC is a 15-member advisory panel which provides advice and recommendations to the BLM regarding resource and land management issues for 22.9 million acres of public lands in Utah. The FLREA mandates that the appropriate Recreation RAC review all BLM recreation fee proposals prior to approval.
- Comments from both the public and the BLM Utah RAC will be considered prior to approval of the increase in the Kanab Field Office campground fee increase.