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Business Plan for BLM Kanab Field Office Campgrounds



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

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Introduction

This 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 analyze Recreation Use Permit (RUP) nightly individual campsite fee increases for the campsites at Ponderosa Grove and White House campgrounds.

The fee increase is necessary to align fee rates and operational costs with recent expansion, 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 fee increases are discussed in detail in the pages that follow.

Upon approval, this Plan would make the following changes:

- Increase the use fee at Ponderosa Grove and White House campgrounds from \$5/night to \$12/night.
- Implement a use fee of \$50/night for the Ponderosa Grove campground Group Site with a maximum of 40 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 *Business Plan for BLM Kanab Field Office Campgrounds* is subject to public review and comments were 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.¹

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

¹ 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.

- 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 Plan and component 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-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.

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.

Kanab-Escalante Planning Area (KEPA) Resource Management Plan

The 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.

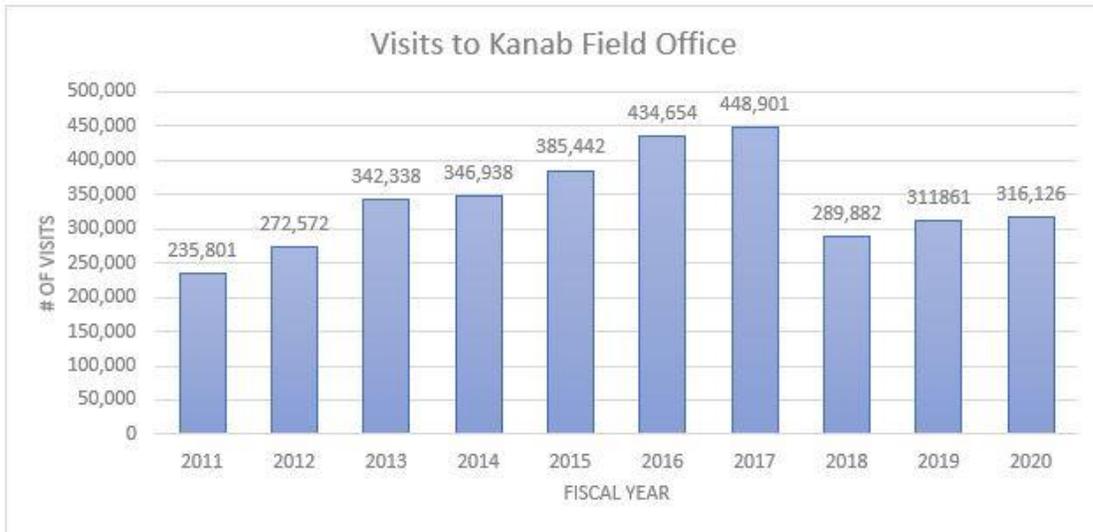
Kanab Field Office Recreation Program and Visitation

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. The graph in table 1 shows a dramatic decrease in visitation in 2018. This decrease is not representative of fewer visits to Kanab Field Office but instead reflects a change in the methods used by the KFO to calculate annual visitor use. In years prior, it was found that visits were double counted, inflating visitation figures beyond actual counts. Visitation shown for the period of 2018 – 2020 reflects a more accurate tally of visitor use than in preceding years.

Table 1



Source: BLM RMIS Database²

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 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.³ Kanab is approximately one hour or less from each forest, so the visitor data shown in figure 1 is applicable. Results from this survey indicate that the great majority of recreation visitors to KFO travel large distances.

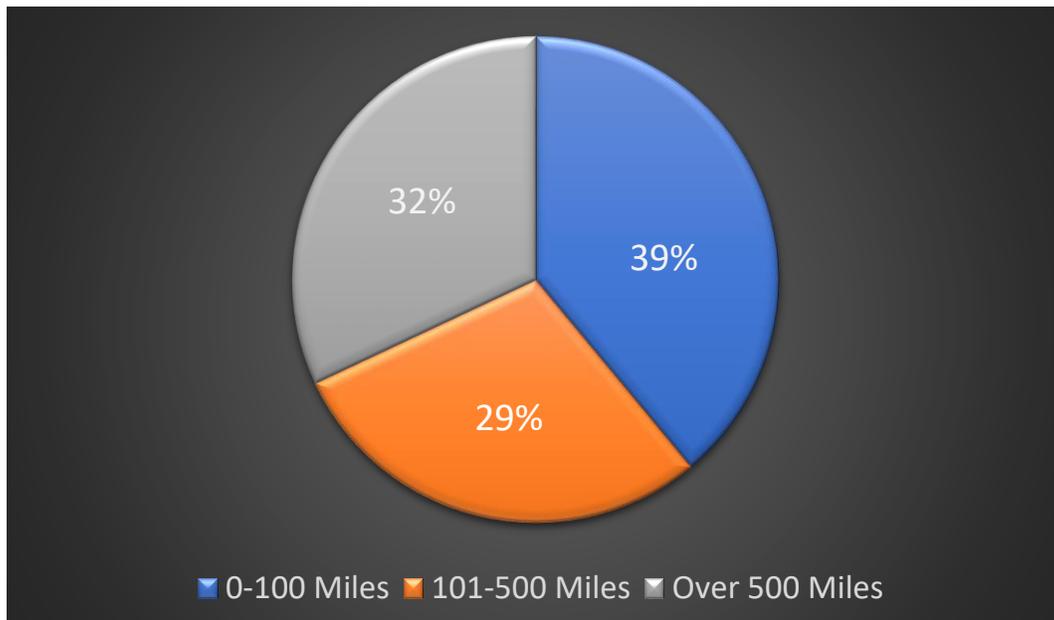


Figure 1 - Percent of Visits by Distance Travelled (NVUM, 2015 and 2019)

² RMIS is BLM’s official database of record for recreation visitor use data

³ [National Visitor Use Monitoring Program | US Forest Service \(usda.gov\)](https://www.usda.gov/nvum)

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. Subsequently, the proposed fee increases at Ponderosa Grove and White House campgrounds are unlikely to affect visitor behavior to the extent that alternate campground accommodations are selected. KFO campground fees, including the increase, are still lower than fees charged at comparable campgrounds in the local area (table 12).

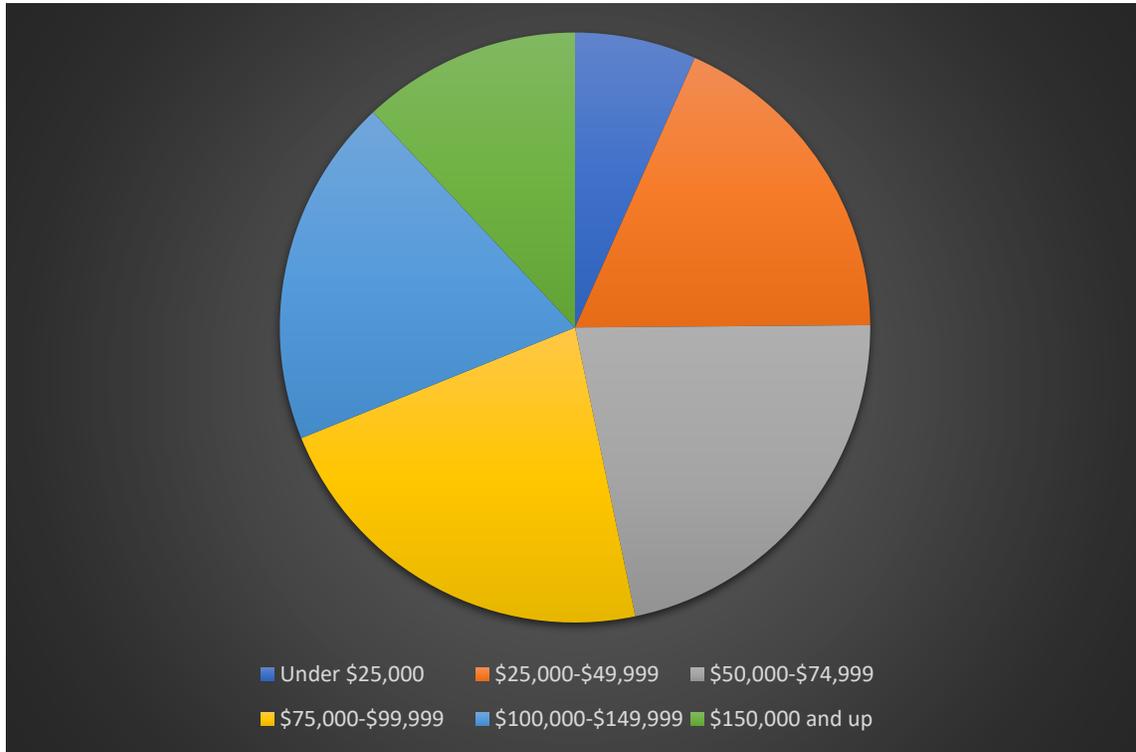


Figure 2: Annual Household Income of Visitors (NVUM, 2015 and 2019)

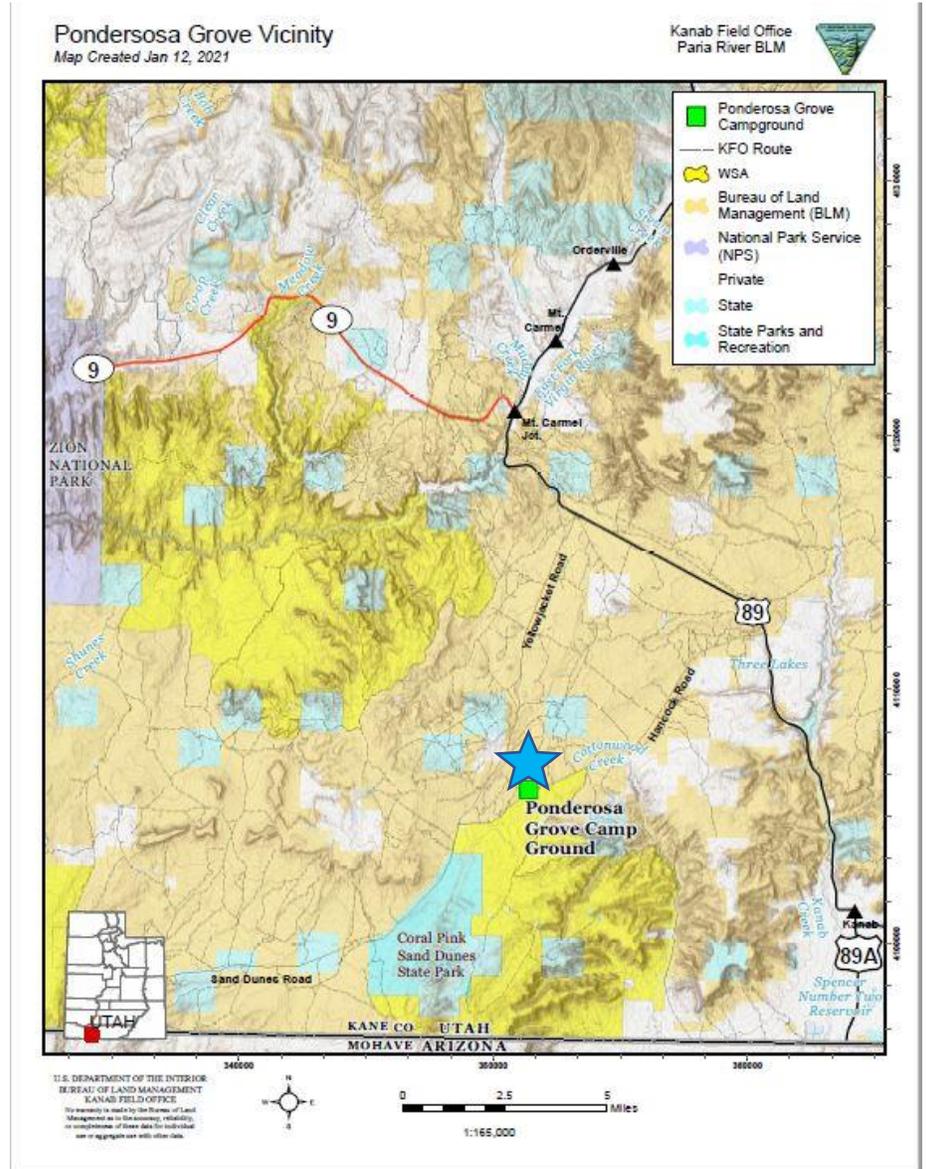
Description of Existing Fee Sites, Proposed Fee Changes and Infrastructure Updates

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, coyotes, 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 2012 the KFO applied for funding through the BLM Color Country District for funding to address deferred maintenance needs and upgrades to the Ponderosa Grove campground. In 2018 the KFO was tentatively awarded funding to complete the expansion and improvements. In 2020, the

campground was expanded and remodeled in response to increasing public visitation and demand for recreational opportunities. Appropriated funding (\$450,000 as of 2/24/21) and a small amount of campground recreation use fee revenues (\$9,000) were used to implement the project. Prior to the expansion, the campground consisted of a gravel loop road, 9 campsites (with tent pads, picnic tables, trash cans and BBQ grills), and an incorrectly installed and aging double-vault restroom facility.



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

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 40 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). The Field Manager may approve larger group sizes for special events or other purposes on a case-by-case basis. Standard car-camping sites were designed to accommodate parking for 2 vehicles and 1-2 tents. Construction was completed in the fall of 2021, with the installation of the group site shade pavilion, barbeque grill and fire pit.

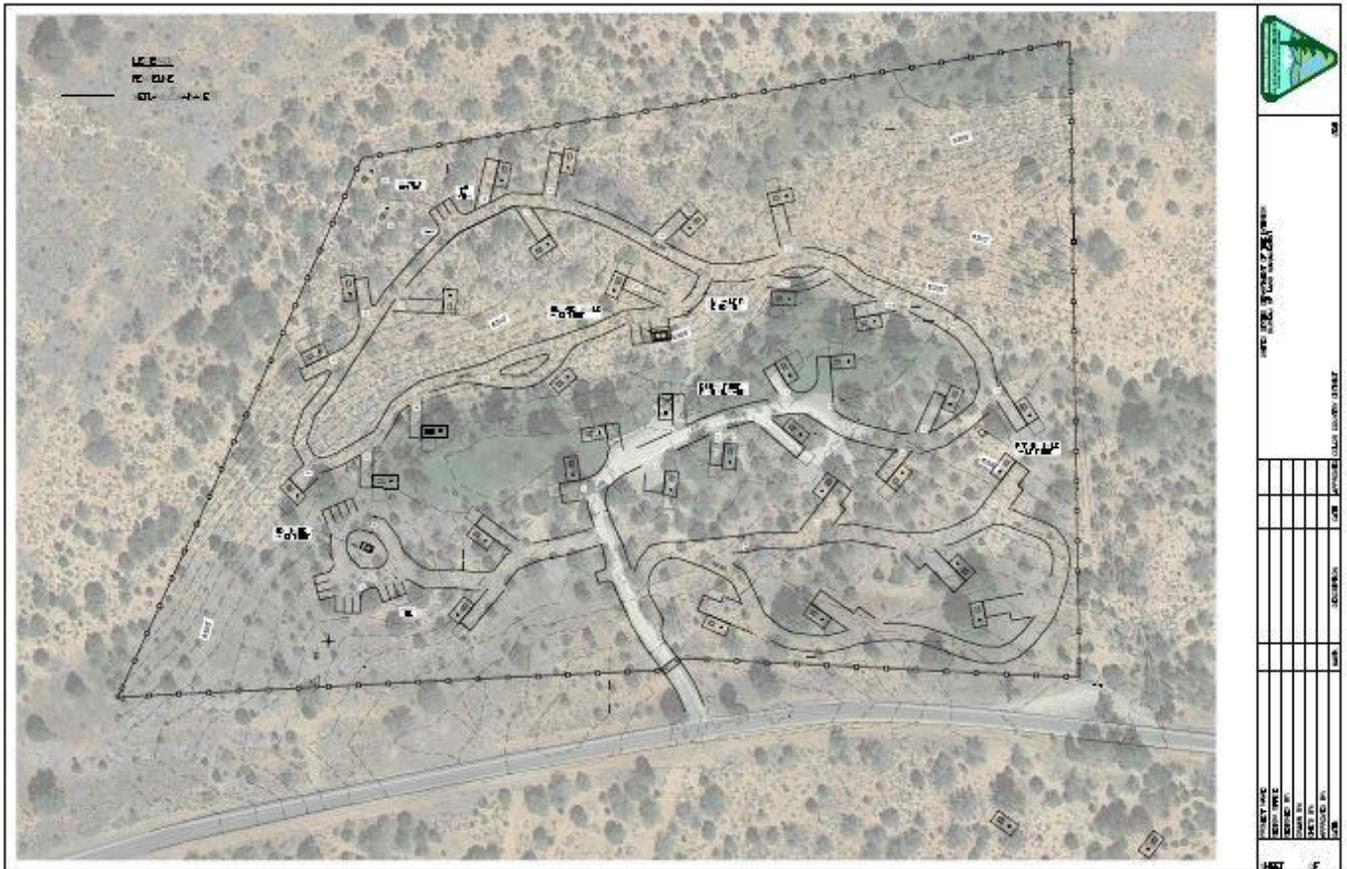
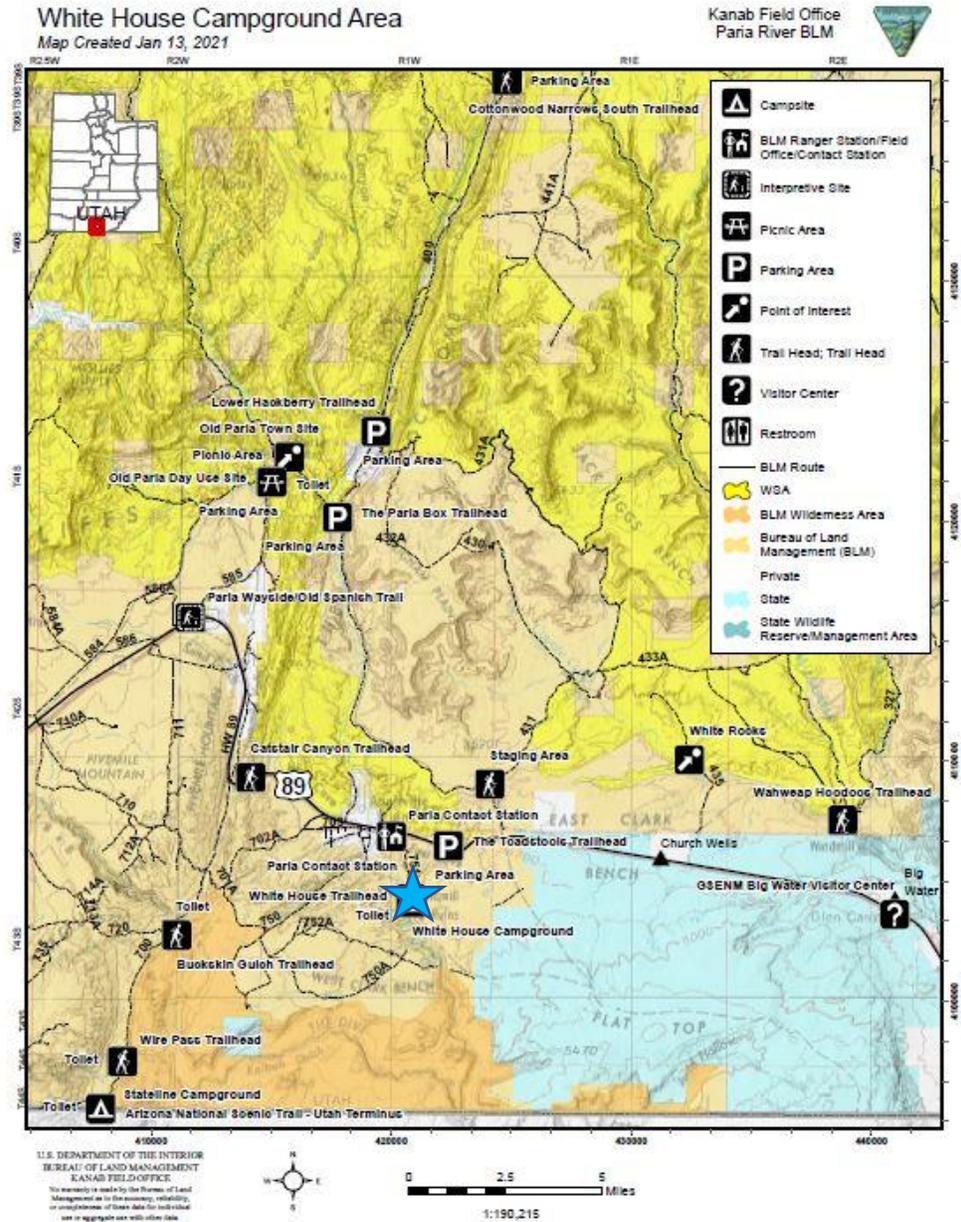


Figure 3 - Conceptual drawing of improvements to Ponderosa Grove Campground, August 2020

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 car-camping 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 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. Standard car-camping sites were designed to accommodate parking for 2 vehicles and 1-2



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.

tents. Additionally, erosion from a major flood event in late 2015 necessitated that the access road be moved and reconstructed. The reconstruction effort was completed using deferred maintenance funds in the amount of \$96,000. 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 campsites sites are for individual use. Currently, no group sites are planned.



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

Table 2: Campgrounds within Kanab Field Office as of 2/23/2021				
Campground Name	Current Site Fees	Location	# of Individual Sites	Number of Group Sites
Ponderosa Grove	\$5 per night	Hancock Road	35	1
White House	\$5 per night	Highway 89 East	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. The average length of stay at Ponderosa Grove campground is estimated at 2 – 3 nights.

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. The average length of stay at White House campground is estimated at 1 night.

To address deferred maintenance needs and accommodate trends of increasing visitor use within the Kanab Field Office (figures 3, 4), improvements to the White House campground were completed in 2019, and the expansion of the Ponderosa Grove campground was completed in the fall of 2021.

Over a 5-year period (2016-2020) visitor use at both campgrounds has fluctuated, with trends of increasing visitation. Visitor use peaked in 2018-2019 and experienced a drop in 2020, possibly due to travel restrictions implemented throughout the year. In Utah, during 2019-2020, COVID-19 influenced visitor use and behavior (volume, manner, location and activity) with trends towards increasing outdoor recreational use of lands managed by municipalities, counties, state parks and national parks, especially as travel restrictions were lifted.⁴ Increasing visitor use has resulted in additional demands on managing agencies to provide essential services and facilities (e.g., visitor use administration, trails maintenance, parking).

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

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 (table 5). The Paria

⁴ 2020 Utah Outdoor Recreation Summit, Webinar Panel Discussion - ‘The Impacts of COVID-19 on Outdoor Recreation Participation’, Utah Governor’s Office of Economic Development - <https://youtu.be/LBhBg-WXzkE>

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 new fee rates and amount of increase from previous rates (table 5) were selected to match expanded amenities and associated maintenance costs at each of the campgrounds. Even though the increase more than doubled the previous fee rates, the use fee is still be lower than many other campgrounds in the local area (table 12).

The KFO currently supports operational costs to maintain campground facilities using a combination of funds from FLREA accounts (fee-generated revenues) and federal appropriations (including deferred maintenance funds). However, increases in visitation to the KFO have increased facility maintenance needs and the demand for developed camping opportunities. Under the old fee rates, annual revenues generated at each site only covered a fraction of the operating and labor costs. The fee increases will help to fund annual operating costs at each site and will help to avoid dependence upon availability of annual appropriations. The fees at 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 appropriate 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 40 people
White House	\$5 per night	\$12 per night

Operating Costs

The Kanab Field Office utilizes service contracts to address routine maintenance and periodic pumping of restroom facilities. The contracts service 4 restroom facilities at Ponderosa Grove campground and 2 restroom facilities at Whitehouse campground. Vault-toilet pumping services are usually performed 1-2 times per year at each of the campgrounds. All four of the contracts are held by local vendors. The KFO chose to utilize contracts to comply with BLM policy for payment of services, to ensure regular maintenance of facilities, and to reduce demands on seasonal and permanent workforce, increasing the capacity of the KFO to address other priority recreation program needs (e.g., visitor contacts, route signing, trailhead maintenance, litter cleanup).

The largest maintenance expense is the bi-weekly cleaning of campground toilets facilities. In addition to cleaning the restrooms, the contract includes buying toilet paper, hand sanitizer, and cleaning supplies. The annual cost of the cleaning contract for Ponderosa Grove campground is \$13,600. The annual cost of the cleaning contract servicing White House campground is \$10,800. Prior to the fee increase, only a fraction of the total cost to operate the Ponderosa Grove and White House campgrounds was funded from the relative FLREA 1232 fee accounts for each campground. Historically, the majority of funding required to operate the campgrounds has come from appropriated funds (tables 6-9) which can vary from year to year. Savings could then be allocated towards other District priorities such as maintenance of existing facilities, provision of visitor services and the development of new facilities to accommodate increasing visitation. The 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: Actual Expenditures of Campground Fees, by Year - Ponderosa Grove Campground						
Federal Fiscal Year	Staff Labor	Operations Costs	Total Annual Expenditures	Revenues	Net Gain/Loss	Fund Balance
2020	\$349	\$10,401	\$10,750*	\$4,738	- \$6,012	\$19,749
2019	\$0	\$1,097	\$1,097	\$5,166	+ \$4,069	\$25,761
2018	\$0	\$0	\$576	\$5,282	+\$4,706	\$21,693
2017	\$0	\$1,223	\$1,223	\$4,728	+\$3,505	\$16,987
2016	\$54	\$0	\$54	\$4,188	+ \$4,134	\$13,482

*Includes additional funds from campground fee account (\$8,909) that were contributed towards cost of campground expansion implemented in FY20. Does not include appropriated funds (\$450,000) that were contributed towards the cost of the FY 2020 expansion.

Table 7: Average Annual Operating Cost – Ponderosa Grove Campground		
Staff Labor	Operations	Total Annual Expenditures
\$70,600	\$28,200	\$98,800

Table 8: Actual Expenditures of Campground Fees by Year – White House Campground						
Federal Fiscal Year	Staff Labor	Operations Costs	Total Annual Expenditures	Revenues	Net Gain/Loss	Fund Balance
2020	\$7,915	\$7,753	\$15,668	\$22,531	+ \$6,863	\$20,285
2019	\$0	\$4,180	\$4,180	\$5,367	+ \$1,187	\$13,422
2018	\$436	\$1,280	\$1,716	\$2,096	+ \$380	\$12,235
2017	\$7,975	\$2,459	\$10,434	\$3,061	- \$7,373	\$11,855
2016	\$1,704	\$207	\$1,911	\$8,153	+ \$6,304	\$19,228

Table 9: Average Annual Operating Cost – White House Campground		
Staff Labor	Operations	Total Annual Expenditures
\$60,742	\$18,600	\$79,342*

*Does not include use of additional funds (\$96,000) used 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) are 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	\$77,145	\$29,420	\$70,600	\$28,200	\$98,800
2022	\$78,300	\$29,860	\$71,660	\$28,620	\$100,280
2023	\$79,460	\$30,300	\$72,720	\$29,040	\$101,310

Table 11: White House Annual Expenditures vs. Estimated Revenues in Campground Program					
Year	Estimated Revenues (assuming fee increase)	Estimated Revenues (with no fee increase)	Labor Expenses	Operations Expenses	Annual Expenditures
2021	\$23,330	\$10,330	\$60,740	\$18,600	\$79,340
2022	\$23,680	\$10,485	\$61,650	\$18,880	\$80,530
2023	\$24,030	\$10,640	\$62,560	\$19,160	\$81,720

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 campground FLREA fund account balances at 50-100% of preceding year to fund ongoing operations, maintenance and staff labor required to operate the campgrounds.

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

Expenditures that are being considered to support the KFO campground program include:

Ponderosa Grove campground

- Develop and install informational/interpretive panels for entrance kiosk – \$2,000.
- Install campground entrance and approach signs - \$15,000.
- Construct group site shade pavilion and group fire pit - \$100,000.
- Install Scan and Pay service/WiFi/cell booster to allow onsite e-payment.
- Implement campground host program to track and monitor site reservation system and provide visitor services.

*These improvements will be constructed using appropriated funds or FLREA campground fee account revenues.

White House campground

- Purchase and install shade structures at the 7 car-camping sites - \$70,000.
- Install Scan and Pay service/WiFi/cell booster to allow onsite e-payment.
-

*These improvements will be funded using FLREA fee account revenues or appropriated 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 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 shows 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 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 with the fee increase to \$12 per night (table 12).

Fair Market Value Fee Calculation

The fee rates outlined 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: 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 tent pads, pit toilets, fire rings, dumpster, group site with shade structure, group fire pit and grill, walk-in tent camping sites.

Table 12: Comparison of Campground Fees in the Kanab Area (2020)			
Campground Name	Agency	Campground Fee(s) per Night	Amenities Offered
White House Campground	Bureau of Land Management	\$5 per site	Picnic tables, gravel tent pads, vault toilets, fire pit, walk-in-tent camping sites.
Dixie National Forest (Blue Spruce)	Forest Service	\$9 per site + \$4 per additional vehicle	Picnic tables, fire grills, water, and vault toilet
Dixie National Forest (Posey Lake)	Forest Service	\$13 per campsite, plus \$8 for additional vehicles. \$50 for group sites up to 35 people.	Picnic tables, fire rings/grills, bear box, water, vault toilet
Zion National Park (Watchman)	National Park Service	\$20 per site +\$10 reservation fee. \$30 for electric sites. \$50-\$130 for group sites.	Picnic tables, fire grills, water, trash, parking spaces, flush toilets, electric, camp host
Zion National Park (South Campground)	National Park Service	\$20 per site. \$50 per group site.	Picnic tables, fire grills, water, trash, parking spaces, flush toilets, dump station, camp host
North Rim of the Grand Canyon	National Park Service	\$18-\$25 per site +\$10 reservation fee. \$50 per group site up to 25 people.	Picnic tables, fire grills, water, flush toilets, dump station, coin laundry, showers, parking, camp host
North Rim of the Grand Canyon (DeMotte)	National Park Service	\$22 per site.	Picnic tables, fire grills, tent pad, vault toilets, water, firewood, trash, camp host
Coral Pink Sand Dunes	Utah State Park	\$25 per single site with no hookups. \$50 for double sites with no hookups. \$40 per single site with water and electric. \$150-\$175 per night at group sites.	Picnic tables, fire grills, water, trash, parking spaces, dump station, showers, flush toilet, phone service, shade shelters, tent pads
Kodachrome Basin	Utah State Park	\$25 per standard site with no hookups. \$35 per full hookup site. \$16 for additional vehicles. \$75 for group site, 15 vehicles max. \$16 per vehicle after 10 vehicles.	Flush and vault toilet, showers, picnic tables, fire rings/grills, trash, power
Red Canyon Campground	Forest Service	\$20 per site. \$40 per group site. \$6 per extra vehicle. \$4 for day use area. \$25 for group site up to 50 people. \$100 for 51-100 people.	Picnic tables, fire pits/grills, drinking water, flush and vault toilets, showers, dump station, garbage disposal

Table 12: Comparison of Campground Fees in the Kanab Area (2020)			
Campground Name	Agency	Campground Fee(s) per Night	Amenities Offered
Kaibab Camper Village	Private	\$20 per site. \$6.00 per person at group site.	Electric, water, sewage, picnic tables, fire grills, toilets, outside sinks, coin showers, coin laundry,
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,

Note - 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 will allow the facilities to be more self-sustaining.

An increase in fees will 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 enhance 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 will 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 will allow visitors to continue to enjoy a quality recreation experience at a fair market value.

A fee increase at the campgrounds may 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 has the ability to address maintenance needs at the campgrounds, supporting health and safety and visitor experience/enjoyment.
- Improved public lands facilities are 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 fee increases allows 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 may 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. The proposed fees are lower than many of the locations listed in table 12. Meaningful effects to low-income populations are not expected, as low-income populations are not heavily represented in the area (as identified in 2015 and 2019 NVUM surveys) and there are abundant opportunities for dispersed camping on the BLM land surrounding the Kanab Field Office campgrounds.

No Fee Increase

Effects to Recreational Users

The former fee structure did not allow BLM to fully fund annual operating costs and did 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 was posted to the website <https://www.blm.gov/programs/recreation/permits-and-fees/business-plans> for 30 days from 01/29/2021 to 02/28/2021.
- A copy of the draft business plan is available at the Kanab Field Office and Grand Staircase-Escalante National Monument Headquarters.

- KFO presented the draft Plan and proposed fee increase to the BLM Utah Recreation Resource Advisory Council (RAC)⁵ on 03/02/2021 for a formal review. Following the presentation, the RAC approved the fee increase.
- Comments from both the public and the BLM Utah RAC were considered prior to approval of the increase in fees for the Kanab Field Office campgrounds.

Whit Bunting
Field Manager
Kanab Field Office

Date

⁵ 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.