

# **Business Plan for BLM Moab Campgrounds**

**(2018 Amendment)**




**United States Department of the Interior  
Bureau of Land Management, Utah  
Canyon Country District  
Moab Field Office  
April, 2018**


**Business Plan for  
BLM Moab Campgrounds  
2018 Amendment**

**RECOMMENDATIONS, REVIEWS and APPROVALS**

Recommended by:

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Date  
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Approved by:

Lance Porter  11 July 2018  
Date  
Canyon Country District Manager

This Business Plan was prepared pursuant to the “Federal Lands Recreation Enhancement Act, 2004” (P.L. 108-447) and BLM recreation fee program policy. It establishes future management goals and priorities for the Campground Program in the Moab Field Office.

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# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Moab Field Office  
82 East Dogwood  
Moab, Utah 84532

In Reply Refer to:  
2932 (UTY01000)

Dear Reader,

I would like to present for your review and comment the Draft *Amended Business Plan for BLM Moab Campgrounds*. The Bureau of Land Management (BLM) Moab Field Office manages 29 campgrounds (many with reservable group sites) that annually provide over 90,000 visitors with outstanding camping opportunities on their public lands. This amended Business Plan adds five future campgrounds in the Moab Field Office to the fee structure. In addition, the amended Business Plan seeks a fee increase from the current \$15.00 per night for individual sites to \$20.00 per night, and a group site per person fee increase from the current \$4.00 per night to \$5.00 per night. Moab BLM campgrounds have won the approval of the public because of the high level of maintenance at these facilities. Both individual campers and large groups of campers are sustainably accommodated within 30 miles of Moab.

The Moab Field Office proposes to add five developed campgrounds in areas where demand for camping is high, but facilities are not available. The future campground locations include Klondike Bluffs, Black Ridge, Utah Rims, Mineral Bottom Road and Cameo Cliffs/Hook and Ladder.

The fee increase is necessary in order to meet the growing expenses of the campground program, especially those for both regular and deferred maintenance. Until now, the campground fee structure has never fully considered the replacement costs of the campground infrastructure. As the Moab campgrounds age and as the demand for them grows, the deferred maintenance needs increase. Last year, revenues for the fee campgrounds were \$994,000, while expenses totaled \$1,192,000. A fee increase is necessary to keep the campground program self-sufficient, as well as to provide for safe and enjoyable camping experiences through routine maintenance as well as increased deferred maintenance.

In addition to the approval for five new fee sites and the increase in price, the Moab Field Office seeks permission to institute an automatic increase to \$25.00 for the individual campsite nightly rate if the Consumer Price Index rises by 20% from the date of approval of this Plan.

The objective of the Draft *Amended Business Plan for BLM Moab Campgrounds* is to provide you with the opportunity to review how collected recreation fees have been and are being planned to be used, and give you the opportunity to submit comments on the proposed fee structure at the five new locations, as well as on the proposed price increases. Comments may be mailed to BLM, Campground Business Plan Comment, 82 E. Dogwood, Moab, UT 84532 or emailed to [kstevens@blm.gov](mailto:kstevens@blm.gov) (put "campground amended business plan comment" in the subject line). Comments are due by May 11, 2018.

Thank you for your interest in your public lands.

Sincerely,

Christina Price  
Moab Field Manager

**Amended Business Plan for  
BLM Moab Campgrounds  
Recreation Use Permits  
WBS# LVRD UT01 0000: Moab Campgrounds**

**Executive Summary**

The *BLM Moab Campgrounds Business Plan* was approved by the Resource Advisory Council (RAC) on August 8, 2012. It was subsequently approved by the Bureau of Land Management (BLM) on September 12, 2012. The Campgrounds Business Plan was amended in 2014 to include additional campground locations. The amended Business Plan was approved by the RAC and the BLM in January of that year. The current (2018) amended Business Plan, upon approval, would make the following changes:

- Increase the individual campsite nightly rate from \$15.00 to \$20.00
- Increase the per person per night charge for group sites from \$4.00 to \$5.00
- Add fee campgrounds at the following locations, with the same \$20.00 per night fee:
  1. North Klondike Bluffs
  2. Mineral Bottom Road
  3. Black Ridge
  4. Cameo Cliffs/Hook and Ladder
  5. Utah Rims

(Each of the five proposed campgrounds have the following expanded amenity requirements: toilets, picnic tables, fire rings, tent/trailer spaces, access roads, collection of fees by an employee, reasonable visitor protection and garbage collection)

- In addition, the Moab Field Office seeks permission to institute an automatic increase to \$25.00 for the individual campsite nightly rate if the Consumer Price Index rises by 20% from the date of approval of this Plan.

After careful consideration of the fee program and the anticipated revenues and expenditures outlined in the BLM Moab Campgrounds Business Plan, the BLM Moab Field Office recommends increasing the nightly individual campsite fee to \$20 and the per person fee for group site users to \$5. The fee increase is necessary in order to meet the growing expenses of the campground program, especially those for deferred maintenance. Until now, the campground fee structure has never considered the replacement costs of the campground infrastructure. As the Moab campgrounds age and as the demand for them grows, the deferred maintenance needs increase. The five newly proposed campgrounds in this Plan are in areas that are seeing increased dispersed camping pressures. Hardened fee campgrounds are necessary in order to prevent resource damage and to provide better visitor services.

**Background and Authorities**

This Business Plan has been prepared to meet the criteria defined in the “Federal Lands Recreation Enhancement Act, 2004” (FLREA). The Bureau of Land Management (BLM)

originally began collecting fees for the recreational use of public lands under the authority of the Federal Land Policy and Management Act (1976), which is known as the “organic act”. The FLREA provides the BLM with the authority to collect an Expanded Amenity Recreation Fee for the recreational use of certain areas. FLREA allows collected Expanded Amenity Recreation Fees to be retained locally and furthermore outlines how revenues are to be used for such things as facility repair, maintenance, enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, law enforcement related to public use and recreation, and direct operating or capital costs associated with the Recreation and Visitor Services program. At the Moab Field Office (MFO), the recreational use of campgrounds within the field office is managed through the Recreation Use Permit Program using the Expanded Amenity Recreation Fee to fund campground maintenance, operations and construction of new campground facilities. Each of the existing Moab campgrounds has the required amenities to qualify for the use of this fee. Each of the newly planned campgrounds will also have the requisite expanded amenities to qualify for the use of the fee: toilets, picnic tables, fire rings, tent/trailer spaces, access roads, collection of fees by an employee, reasonable visitor protection and garbage collection.

FLREA guidelines and the BLM 2930 Manual and Handbook require that each fee program have a business plan which thoroughly discusses fees and explains how fees are consistent with the criteria set forth in the Act. Business plans are to assist management in determining the appropriateness and level of fees, cost of administering fee programs, outline how fees will be used, and provide a structured communication and marketing plan. The primary purpose of the plans 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. This campground fee Amended Business Plan is subject to public review and is the Moab Field Office’s official documentation in the event of an audit.

In the MFO, campground revenues are deposited in the Moab Campground Fee account (WBS# LVRD UT010000). These deposits include revenues from both group sites and individual campsites. This Business Plan covers both these sources of revenue.

This Business Plan has been prepared to meet the criteria defined in the “Federal Lands Recreation Enhancement Act 2004” (P.L.108-447). The authorities and regulations for this Business Plan, including fee collection for Campground, are:

- **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 Federal Lands Recreation Enhancement Act (FLREA), 2004**, repealed applicable portions of the Land and Water Conservation Fund Act and replaced BLM’s authority to collect recreation fees in 2004. This current 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.

- 43 CFR 2930: Permits for Recreation on Public Land

This Business Plan has also 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*

The BLM strives to manage recreation and visitor services to serve the diverse visitor outdoor recreation demands while helping to maintain sustainable setting conditions needed to conserve public lands so the visitors' desired recreation choices remain available. 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.

In addition, the Business Plans complements the BLM's Leadership Priorities of serving the American family, getting America back to work and making America great through shared conservation.

This Business Plan will assist the Moab Field Office in meeting these visitor service goals. This plan covers all previously authorized fee campgrounds operated by the Moab Field Office (33 campgrounds and 29 reservable group sites). In addition, two campgrounds and one reservable group site are authorized and approved, but not yet constructed. This plan applies to the collection of fees at these future facilities as well. The plan also seeks a fee increase for both the individual and group campsites, and seeks authorization for the collection of fees at the five newly proposed campgrounds listed above.

#### **A. Introduction to the Moab Field Office Campground Program**

##### Administrative Unit

The Moab Field Office of the Canyon Country District, Bureau of Land Management, is the administrative unit for the WBS# LVRD UT010000 account (the Moab Campground Fee Account). The Moab Field Office manages approximately 1,500,000 acres of public lands in Grand County, Utah as well as approximately 300,000 acres of public lands in San Juan County, Utah. The Moab Field Office is located in Utah Congressional District 2.

### Moab Field Office Recreation Program and Visitation

The Moab Field Office has a diverse and extensive recreation program. The red rock scenery in the Moab area is iconic and is highly sought after by local, national and international visitors. Features such as the Colorado River, Fisher Towers, Castle Rock, the Slickrock Bike Trail, other singletrack bike trails, Jeep Safari routes, and Gemini Bridges attract visitors from all over the world, who recreate both privately and by hiring permitted commercial outfitters and by participating in permitted events.

Arches National Park is enveloped by lands managed by the Moab Field Office; Canyonlands National Park and Dead Horse Point State Park are located along the field office's western boundary.

Visitation to BLM lands in the Moab Field Office is very high, totaling approximately 2.5 million recreation visits in 2016. This visitation exceeds that of Arches National Park. Table 1 displays the average number of recreation visits over the past six years to both Moab Field Office and Arches National Park lands.

**Table 1: Visits to Moab Field Office and Arches National Park over a Ten Year Period**

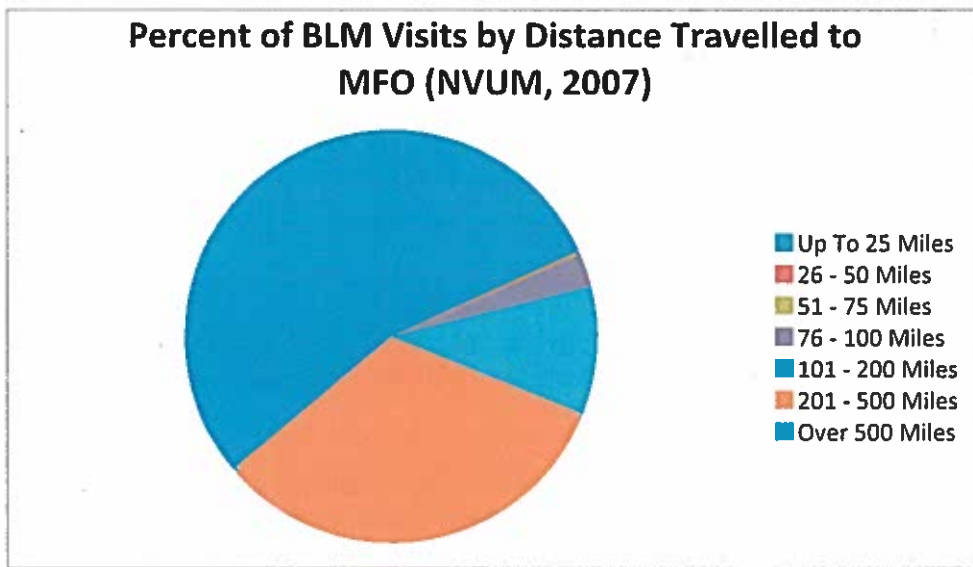
| <b>Year</b> | <b>Visits to Moab Field Office</b> | <b>Visits to Arches National Park</b> |
|-------------|------------------------------------|---------------------------------------|
| 2007        | 1,493,700                          | 860,181                               |
| 2008        | 1,706,389                          | 928,795                               |
| 2009        | 1,674,504                          | 996,312                               |
| 2010        | 1,834,724                          | 1,014,405                             |
| 2011        | 1,809,702                          | 1,040,758                             |
| 2012        | 1,829,043                          | 1,070,577                             |
| 2013        | 1,996,520                          | 1,082,866                             |
| 2014        | 2,023,093                          | 1,284,767                             |
| 2015        | 2,223,186                          | 1,399,247                             |
| 2016        | 2,499,289                          | 1,585,718                             |

Visitation to the Moab area grew at a 9% rate during the 1990's, but has since leveled off to an approximately 7% yearly growth rate since 2012. Thus, it is anticipated that recreation visitation will continue to grow, but at this lower rate.

The recreation programs provided by the Moab Field Office (both commercial and private), are particularly important to the Grand County economy. A study commissioned by Grand County and conducted by Headwaters Economics (*Economic Value of Public Lands in Grand County, Utah, 2011 and updated in 2015*) found that the economy of Grand County is heavily dependent upon public lands recreation use. It is unlikely that any other county in the United States that is surrounded by BLM lands is as heavily dependent on public recreation lands for its economic well-being. The report referenced above shows that non-local visitors to the Moab BLM (note that this does not include National Park visitors) results in more than \$177 million in local output, 2,447 jobs (out of a total of 5,556 jobs in Grand County) and \$64 million in labor income.



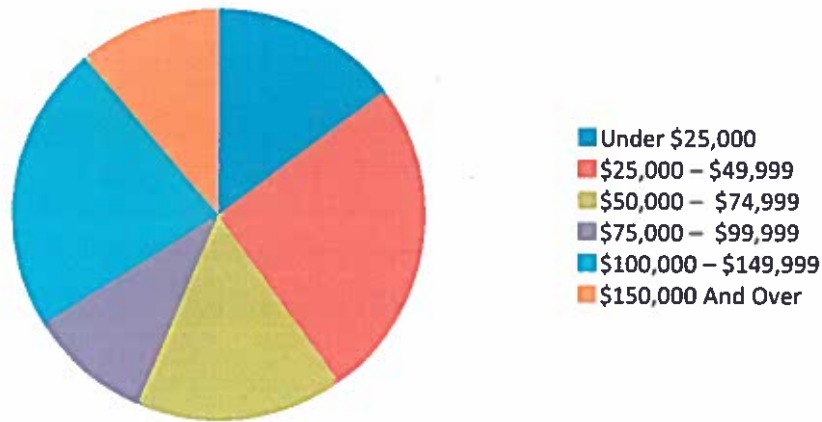
The most reliable information on visitor demographics, such as from where visitors to Moab BLM originate, comes from 2006 data gathered for the National Visitation Use Monitoring (NVUM) study. This was prepared by the U.S. Forest Service (U.S. Forest Service, 2007) for the Moab BLM. Results from this survey indicate that the great majority of recreation visitors to Moab BLM travel large distances to come to the area. Although this data is a decade old, it is still the best summary of visitor profiles to the Moab BLM. Current on-the-ground observation does not contradict the findings of this exhaustive study. The NVUM study's findings are summarized in the following chart:



The visits reported above include 6.5 per cent overseas visitation, primarily from Europe (4.1 per cent) and Canada (2.3 percent).

Recreation visitors to Moab BLM have a higher than average income profile than the population at large. This is illustrated in the following chart, derived from the 2007 NVUM study:

### Annual Household Income of Visitors to the Moab FO (NVUM, 2007)



#### Applicable Plans

Management in the Moab Field Office is guided by the Approved Moab Field Office Resource Management Plan (RMP) which was signed on October 31, 2008. Specific decisions were made concerning the campground program. These are:

**REC-3:** BLM will consider and, where appropriate, implement management methods to protect riparian resources, special status species, and wildlife habitat while enhancing recreation opportunities. Management methods may include limitation of visitor numbers, camping and travel controls, implementation of fees, alteration of when use takes place, and other similar actions to be approved through normal BLM procedures.

**REC-21:** Manage all SRMAs for sustainable camping opportunities. Camping may be restricted to designated sites if use and conditions warrant.

**REC-29: Facilities:** Campground facilities may be constructed; however, they will be located to avoid wetland, riparian, cultural resources, floodplains, and special status plant and animal species habitats. If avoidance is not possible, mitigation will be implemented to augment the values affected by the construction.

**REC-35: Cameo Cliffs SRMA –** Implement camping management rules as use levels and resource impacts warrant.

In addition, specific future campground locations were identified in the 2008 RMP. These locations are found under each Special Recreation Management Area's "Future Facilities" listings. As these campgrounds are developed, site-specific Environmental Assessment documents are prepared and public input solicited. These future campgrounds are among those listed below as already authorized by the RAC.

The six developed campgrounds that were added to the fee structure in 2014 were all in operation at the time of the RMP, and are covered under Decision REC-3. The five campgrounds proposed in this updated Business Plans are not in operation currently.

Appendix L of the Moab RMP (*Moab Field Office Recreation Rules*) states:

**L.1.1 CAMPING IN RESTRICTED AREAS:** Camping is restricted to improved recreation sites (i.e., campgrounds or camping areas) with facilities managed for overnight use. Fires are restricted to metal fire grills provided at the campgrounds. When camping in areas with developed facilities, camping is restricted to designated sites... As campgrounds are constructed, camping would be restricted to improved recreation sites (i.e., campgrounds or camping areas) with facilities managed for overnight use.

### B. Description of the Moab Campground Program

The Moab Campground Fee Account receives revenues from individual campers as well as group site payments (which are made through recreation.gov). Revenues from the Moab Campground Fee Account are used to maintain camping facilities throughout the Field Office. The following table includes facilities and locations that are currently maintained using Moab Campground Fee Account monies:

**Table 2: Campgrounds in the Moab Field Office**

| Campgrounds Currently in Operation |                                   |                                    |                        |                   |                    |
|------------------------------------|-----------------------------------|------------------------------------|------------------------|-------------------|--------------------|
| Name of Campground                 | Current Individual Site Fee/Night | Proposed Individual Site Fee/Night | Location               | No. of Ind. Sites | No. of Group Sites |
| Goose Island                       | \$15.00 per site                  | \$20.00 per site                   | MP 2, Highway 128      | 18                | 2                  |
| Grandstaff                         | \$15.00 per site                  | \$20.00 per site                   | MP 3, Highway 128      | 16                | 0                  |
| Drinks Canyon                      | \$15.00 per site                  | \$20.00 per site                   | MP 6, Highway 128      | 17                | 0                  |
| Hal Canyon                         | \$15.00 per site                  | \$20.00 per site                   | MP 7, Highway 128      | 11                | 0                  |
| Oak Grove                          | \$15.00 per site                  | \$20.00 per site                   | MP 7, Highway 128      | 7                 | 0                  |
| Big Bend                           | \$15.00 per site                  | \$20.00 per site                   | MP 8, Highway 128      | 23                | 3                  |
| Upper Big Bend                     | \$15.00 per site                  | \$20.00 per site                   | MP 9, Highway 128      | 8                 | 0                  |
| Rock Castle                        | \$15.00 per site                  | \$20.00 per site                   | 5 mi. up Castle Valley | 4                 | 0                  |
| Upper Onion Creek                  | \$15.00 per site                  | \$20.00 per site                   | MP 21, Highway 128     | 14                | 2                  |
| Lower Onion Creek                  | \$15.00 per site                  | \$20.00 per site                   | MP 22, Highway 128     | 21                | 1                  |
| Fisher Towers                      | \$15.00 per site                  | \$20.00 per site                   | MP 22, Highway 128     | 5                 | 0                  |
| Hittle Bottom                      | \$15.00 per site                  | \$20.00 per site                   | MP 23, Highway 128     | 15                | 0                  |
| Dewey Bridge                       | \$15.00 per site                  | \$20.00 per site                   | MP 29, Highway 128     | 7                 | 3                  |
| Kings Bottom                       | \$15.00 per site                  | \$20.00 per site                   | 2.8 miles from Hwy     | 21                | 0                  |

<sup>1</sup> Group site reservation holders are required to pay for the minimum group size at each site (from 15 to 90 people). That is, a site with a minimum of 15 people and with a \$4.00 per person per night fee would cost \$60.00 per night for 15 people, and \$4.00 more per night for each extra person. The newly proposed fee would be \$5.00 per person per night, meaning that a site with a minimum of 15 people would cost \$75.00 per night for 15 people and \$5.00 more per night for each extra person.

|   |  |  |   |    |   |
|---|--|--|---|----|---|
|   |  |  | 191 on Kane Creek Rd                        |    |   |
| Moonflower<br>(group site only)   | n/a  | n/a  | 3.0 miles from Hwy<br>191 on Kane Creek Rd  | 0  | 1 |
| Hunter Canyon   | \$ 15.00 per site  | \$20.00 per site   | 7.8 miles from Hwy<br>191 on Kane Creek Rd  | 7  | 0 |
| The Ledge   | \$ 15.00 per site  | \$20.00 per site   | 12 miles from Hwy<br>191 on Kane Creek Rd   | 31 | 2 |
| Jaycee Park   | \$15.00 per site   | \$20.00 per site   | 4.2 miles from Hwy<br>191 on U-279          | 7  | 0 |
| Williams<br>Bottom  | \$ 15.00 per site  | \$20.00 per site   | 6 miles from Hwy 191<br>on U-279            | 17 | 0 |
| Goldbar   | \$ 15.00 per site  | \$20.00 per site   | 10 miles from Hwy<br>191 on U-279           | 5  | 4 |
| Courthouse<br>Rock  | \$15.00 per site   | \$20.00 per site   | 16 miles from Moab<br>off Hwy 191           | 10 | 0 |
| Lone Mesa<br>(group sites<br>only)  | n/a  | n/a  | 9 miles from Hwy 191<br>on U-313            | 0  | 5 |
| Horsethief  | \$15.00 per site   | \$20.00 per site   | 12 miles from Hwy<br>191 on U-313           | 55 | 1 |
| Cowboy Camp   | \$ 15.00 per site  | \$20.00 per site   | 18 miles from Hwy<br>191 on U-313           | 7  | 0 |
| Ken's Lake  | \$15.00 per site   | \$20.00 per site   | 10 miles south of<br>Moab                   | 47 | 2 |
| Windwhistle   | \$15.00 per site   | \$20.00 per site   | 38 miles south of<br>Moab                   | 15 | 1 |
| Hatch Point   | \$15.00 per site   | \$20.00 per site   | 56 miles south and<br>west                  | 10 | 0 |
| Westwater   | \$15.00 per site   | \$20.00 per site   | At the Westwater<br>Ranger Station          | 15 | 0 |
| Swasey's Rapid<br>(administered by<br>Price Field<br>Office)                                | \$15.00 per site   | \$20.00 per site   | On the Green River<br>and the Hastings Road | 15 | 1 |
| <b>Campgrounds Already Authorized for Fee Collection (not yet constructed or remodeled)</b> |  |  |   |    |   |
| Moab Skyway*  | \$4.00/ person<br>\$200 minimum<br>for event<br>registration | \$5.00/ person<br>\$200 minimum<br>for event<br>registration | 1 mile from Hwy 191<br>on Kane Creek Road   | 0  | 1 |
| Bartlett*   | \$15.00 per site   | \$20.00 per site   | West of Hwy 191 off<br>Dubinky Road         | 12 | 0 |
| Entrada Bluffs*   | \$15.00 per site   | \$20.00 per site   | 2 miles south of Hwy<br>128                 | 15 | 0 |
| Bitter Creek**  | \$15.00 per site   | \$20.00 per site   | East of Westwater<br>Ranger Station         | 10 | 0 |
| Hideout**   | \$15.00 per site   | \$20.00 per site   | Top of Onion Creek<br>Road                  | 5  | 0 |
| Cowskin**   | \$15.00 per site   | \$20.00 per site   | On Entrada Bluffs Rd.                       | 10 | 0 |
| Fish Ford**   | \$15.00 per site   | \$20.00 per site   | West of Cisco                               | 10 | 0 |

\*Not yet constructed

\*\*In use as campgrounds, but fees will be instituted when improvements are complete.

The 2017 amendment to the Business Plan also seeks authorization to charge fees at campgrounds proposed for construction at five locations (North Klondike, Mineral Bottom Road, Black Ridge, Cameo Cliffs/Hook and Ladder and Utah Rims). Each of the five proposed campgrounds would be built and have the following expanded amenity requirements: toilets, picnic tables, fire rings, tent/trailer spaces, access roads, collection of fees by an employee, reasonable visitor protection and garbage collection.

**Table 3: New Campgrounds Proposed for Fee Collection**

| Name of Campground           | Proposed Fee/Night | Location  | Number of Ind. Sites Planned | Number of Group Sites Planned |
|------------------------------|--------------------|---|------------------------------|-------------------------------|
| North Klondike               | \$20.00 per site   | 20 miles north of Moab on Hwy 191                       | 30                           | 0                             |
| Mineral                      | \$20.00 per site   | 5 miles west of Hwy 313 on the Mineral Bottom Road      | 20                           | 0                             |
| Black Ridge                  | \$20.00 per site   | 12 miles south of Moab on Black Ridge Road              | 15                           | 0                             |
| Cameo Cliffs/Hook and Ladder | \$20.00 per site   | 25 miles south of Moab on Steen Road                    | 20                           | 0                             |
| Utah Rims                    | \$20.00 per site   | 3 miles south of I-70 to the east of the Westwater Road | 20                           | 0                             |

In summary, the current amendment to the Business Plan would

- increase the nightly individual campsite fee from \$15.00 per site to \$20.00 per site at all campgrounds
- increase the nightly group site fee from \$4.00 per person to \$5.00 per person at all group sites
- authorize the collection of fees at five new campgrounds

Furthermore, the Moab Field Office seeks permission to raise the nightly campground fee at all campgrounds to \$25.00 per site if and when the Consumer Price Index rises by 20% from the time of this approval.

#### Future Campground Development Scenario

##### *Premium View Special Group Sites*

The Moab Field Office has received RAC approval for fees associated with the development of new premium view/special reservable group sites at multiple locations. The sites would be chosen based on the views offered from the campsite, other special features, ease of access, development costs and anticipated visitor demand. For example, the area used to store gravel

during the construction of the Needles Overlook Road has outstanding views of the entire Canyonlands Basin. By adding fire grills, picnic tables and a toilet, this site could be available for nightly rental to groups. The exact amount to be charged for these sites would be subject to future RAC approval.

#### *Future Campgrounds*

The 2008 Moab Resource Management Plan (RMP) calls for the development of campgrounds in areas that experience growth in visitation, or where “unacceptable damage to natural or cultural resources” occurs through unrestricted camping. In addition, Decision REC-21 states: “manage all SRMAs for sustainable camping opportunities. Camping may be restricted to designated sites if use and conditions warrant” (page 83). REC-35 (page 85) states: “Implement camping management rules as use levels and resources impacts warrant” (in the Cameo Cliffs SRMA).

Development of such campgrounds would be considered consistent with this Business Plan, and be subject to future RAC approval as fee areas.

The 2017 Business Plan Amendment seeks approval to add five fee campgrounds to the Business Plan. The first would be to add a developed fee campground near the North Klondike Bluffs Mountain Bike Trailhead, located seventeen miles north of Moab off U.S. Highway 191. The proposed campground would serve the public in the North Klondike area, who utilize the area primarily for mountain biking and paleontological resources viewing. Since the opening of the North Klondike mountain bike trail system, there has been a great demand for campsites in the vicinity. The resultant dispersed camping is causing unacceptable resource impacts, including off-road driving in search of campsites, trampling of vegetation, proliferating fire rings, increased trash and toilet paper and inappropriate disposal of solid human waste. The BLM would build the “North Klondike Campground” after obtaining the necessary authorization and posting the proposed fee in the Federal Register; that action would restrict camping to designated sites as well as seek approval for the new fee campground. This action would be in conformance with the RMP decisions listed above.

The second campground to be added to the list of approved fee campgrounds would be located along the Mineral Bottom Road off Utah Highway 313. This road is the access point for the National Park Service’s White Rim bike and jeep trip, as well as the access for the Mineral Bottom Boat Ramp. Those floating the Green River on either the Labyrinth or Stillwater sections could utilize this campground before or after beginning their trips. In addition, many other types of recreationists use the public lands along the Mineral Bottom road for activities such as hiking, slacklining, basejumping and motorized touring. These recreationists are increasingly seeking camping experiences along the Mineral Bottom road. The resultant dispersed camping is causing unacceptable resource impacts as detailed in the paragraph above. There is a need for both campsites and toilets in this vicinity. The BLM would build the “Mineral Campground” after obtaining the necessary authorization and posting the proposed fee in the Federal Register; that action would restrict camping to designated sites as well as seek approval for the new fee campground, this action would be in conformance with the RMP decisions listed above.

The third campground to be added to the list of approved fee campgrounds would be located on the Black Ridge Road, located approximately 12 miles south of Moab off U.S. Highway 191. This location sees a great deal of designated dispersed camping, as it is adjacent to motorized recreation opportunities, including Area BFE, the Strike Ravine Jeep Safari Route, and the Coyote Canyon Rockcrawling route. There is a need for developed camping opportunities, metal fire rings and toilets in the vicinity. The BLM would build the “Black Ridge Campground” after obtaining the necessary authorization and posting the proposed fee in the Federal Register; camping is already limited to designated sites in the area via action in the Moab RMP. The addition of a campground in the Black Ridge area would be in conformance with the RMP decisions listed above.

The fourth campground to be added to the list of approved fee campgrounds would be located near the Cameo Cliffs/Hook and Ladder OHV parking area. This area is approximately 22 miles south of Moab to the east of U.S. Highway 191. Visitors are drawn to the area for its ATV/UTV/motorcycle opportunities, and often wish to camp near the trailhead. There is a need for developed camping opportunities, toilets and trash receptacles in the vicinity. The BLM would build the “Cameo Cliffs/Hook and Ladder Campground” after obtaining the necessary authorization and posting the proposed fee in the Federal Register. The addition of a campground in the Cameo Cliffs area would be in conformance with the RMP decisions listed above, as well as with the Cameo Cliffs Special Recreation Area Management Plan.

The fifth campground to be added to the list of approved fee campgrounds would be located south of Interstate 70 on the east side of the Westwater Ranger Station entrance Road (Route 192). This area is on the eastern side of the Moab Field Office. Visitors are drawn to the area for its motorized vehicle opportunities, as well as for bicycle trips on the Kokopelli Trail. In addition, boaters utilizing the Westwater Ranger Station often find the Westwater Campground full; the proposed Utah Rims Campground would also serve these boaters. There is a need for developed campsites, toilets and trash receptacles in the vicinity. The BLM would build the “Utah Rims Campground” after obtaining the necessary authorization and posting the proposed fee in the Federal Register. The addition of a campground in the Utah Rims area would be in conformance with the RMP decisions listed above, as well as with the Utah Rims Special Recreation Area Management Plan.

### Visitation

There were approximately 221,839 visits to BLM Moab campgrounds in 2016. A visit is considered to be one person staying one night. It should be noted that the majority of these visitors stay more than one night, and each site typically accommodates more than one visitor.

The Table 4 provides the numbers of BLM camper-nights at individual and group sites for the past five years.

**Table 4: Number of Camper Visitor Nights in Moab Field Office Campgrounds, 2012-2016**

| Year | Number of Camper Visitor Nights | Number of Group Site Visitor Nights | Number of Total Camper Visitor Nights (group and individual) |
|------|---------------------------------|-------------------------------------|--|
| 2012 | 115,836                         | 43,054                              | 158,890  |
| 2013 | 130,641                         | 35,276                              | 165,917  |
| 2014 | 133,745                         | 39,628                              | 173,373  |
| 2015 | 172,095                         | 47,621                              | 219,716  |
| 2016 | 177,261                         | 34,437 <sup>2</sup>                 | 211,698  |

### Partnerships and Volunteer Programs

The Moab BLM Campground program is supported by a cadre of volunteer campground hosts. Hosts are or have been stationed at the following campgrounds: Goose Island, Big Bend, Hittle Bottom, Horsethief, King's Bottom, Ken's Lake, Windwhistle and Williams Bottom. Volunteers also augment BLM staff at the Westwater location. Hosts are volunteers, and provide visitor services at the campground at which they are stationed. In addition, hosts provide visitor services to the campgrounds in close vicinity to their home campground. For instance, the host stationed at Horsethief also patrols nearby Cowboy Camp and Lone Mesa campgrounds.

### **C. Modifications for the Recreation Fee Rates**

#### Rate Increase Approved in 2012

In 2012, The BLM raised the campground fees to \$15.00 per site. In addition, group site reservation fees were increased to \$20.00 per reservation, and the per person per night fees to \$3.50 or \$4.00 per person per night. The increase in fees affected approximately 30,000 campsite holders per year, who paid an additional \$2.00 to \$3.00 for their individual campsites. Group site holders paid an additional \$5.00 to reserve the campsite, and an additional \$1.00 per person per night for each person (14,000 people in 2011) staying in a group site. These increases raised the revenue from the Moab Campgrounds from approximately \$521,000 to \$651,000 per year, or an increase of \$130,000 per year. Prior to 2012, the fee was last raised in 2007 (from \$10.00 to \$12.00), when the Consumer Price Index was 202.4. At the beginning of 2012, the Consumer Price Index was 227.7, representing an increase of 11.2%. The fee increase approved in 2012 (effective January 1, 2013) was intended only to offset inflation, and was not sufficient to construct needed improvements within the campgrounds.

#### Rate Increase Requested in 2017

The proposal before the RAC is to increase the current \$15.00 per night fee to \$20.00 per night per site for all of the campgrounds. Group site fees would be raised to \$5.00 per person per night. In March of 2017, the Consumer Price Index was 245.519, an increase of 21.3 percent over its 2007 value, and an increase of 7.82 percent over its 2012 value. However, even in 2012,

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<sup>2</sup> First year on [recreation.gov](http://recreation.gov)



the actual cost of running the campground program was \$19.57 per site per night, which is greater than the \$15.00 per site that is currently charged. In 2012, the fee was not increased to the actual cost because the Moab Field Office supplemented the operating cost of the campgrounds with appropriated monies. In 2017, the appropriated monies have become less reliable, leading to the need for a fee increase to the actual operating cost of \$19.57 in order to recover actual costs. A fee of \$20.00 per night (and \$5.00 per person for group sites) would recover actual operating costs. It should be remembered that those over the age of 62 and persons with permanent disabilities are entitled to half-price camping fees if they possess the Senior or Access Interagency Pass. Thus, the actual cost of providing camping opportunities to those over the age of 62 is difficult to recover under the current fee structure. While the capital costs of adding campgrounds can sometimes be partially funded through grants and from other outside BLM sources, campground fee revenue is the primary source of funding used to construct new facilities and improvements.

Thus, in addition to offsetting inflation and covering operating costs, a fee increase is also required in order to construct needed improvements within the campgrounds as well as constructing new campgrounds. See Appendix A for a list of needed campground improvements construction projects. The cost of these improvements total \$9,609,000.

The BLM also requests a rate of \$25 per night at all Moab BLM campgrounds (existing and new) if the Consumer Price Index increases by 20% from the date that this Business Plan is approved. That is, if and when the Consumer Price Index rises to 294.62 (from its current 245.52 as of November 2017), the individual nightly campground fee would increase to \$25. Public notification would occur concerning this fee increase, but no other action would be required. Group site prices would remain unchanged.

#### **D. Expenditures/Operating Costs**

The Moab Field Office maintains an extensive infrastructure that supports its large campground operation. The largest expense is the biweekly (at a minimum) cleaning of each of the 33 campgrounds and their 93 toilets. Toilets are cleaned using a high pressure, hot water system mounted on a truck. In addition, each of the 572 metal campfire rings is cleaned out and washed on each cleaning visit. The campgrounds have over 680 picnic tables; these are washed as needed. Cleaning duties are performed by a 13-person BLM maintenance crew. This crew is responsible for cleaning the campgrounds, maintaining the infrastructure in the campgrounds (such as painting toilet buildings), and for construction of campground amenities such as shade shelters. Replacement of campground infrastructure is performed as needed. For example, toilets, picnic tables and/or fire rings need continual replacement; access roads need grading and gravel hauls. Landscaping work on the campground grounds is also undertaken by the maintenance crew, including planting new trees and watering existing ones. New campground facilities are also built by the maintenance crew, with assistance of the BLM's annual appropriate budget. Garbage service is provided at the campgrounds; a Moab garbage disposal company has the contract for the campground dumpsters. For FY 2017, the rental and servicing of trash dumpsters alone cost over \$86,000. This cost was \$42,000 in FY 2012, when the fees were last raised. The cost of garbage removal for FY 2018 is \$93,000.

Toilet effluent is pumped as needed; up until 2017, the National Park Service performed this function at a cost of \$32,000 per year. In 2016, the Park Service decided that its pumping truck and driver were not able to service BLM toilets due to increased demand on Park Service units. As a result, the BLM was obligated to contract a private contractor who pumps the toilet vaults. Additionally, in 2016, the City of Moab told the BLM that, during the construction of its new sewage plant, it could no longer take the BLM's effluent at the Moab plant. This means that the effluent must be hauled from Moab to Helper, Utah. The sewage treatment costs for BLM have increased substantially for both these reasons (\$81,600 for FY 2017)

Maintenance of the drinking water systems and monthly sampling is provided at those campgrounds which have this service (Windwhistle and Westwater). The costs of cleaning and maintaining the campgrounds includes paying maintenance workers, replacing specially-equipped cleaning trucks, buying toilet paper, garbage bags and cleaning supplies, as well as paying for garbage and sewage contracts.

Annual operating costs for the campground program also include expenditures for group site reservation administration, monitoring of visitor use, fee collection/counting, law enforcement services, as well as maintenance and cleaning, vault toilet pumping and trash disposal. Up to twenty-two permanent employees provide services to the campground program; thirteen maintenance workers ensure the cleanliness and safety of the facilities, three recreation employees are involved with group site reservation administration and fee counting, four employees are involved with campground monitoring and fee collection, and two law enforcement officers provide safety patrols in the campgrounds.

The program also supports government vehicles and equipment used to support patrols, maintenance work, resource and visitor use monitoring and law enforcement. Vehicles routinely used include pick-up trucks, patrol vehicles, and specialized cleaning trucks equipped with hot water high pressure washing machines. A large water truck is used to charge vault toilets with water to ensure cleanliness and safety. Campground maintenance and construction often requires the use of a skid-steer loader; heavy equipment is also utilized as needed. Table 5 identifies the annual expenditures associated with the Moab Campground Fee Account program, and also includes revenues as well as the net gain / loss and fund balance for seven fiscal years. Note that these figures do not include monies utilized from appropriated funds.

**Table 5: Actual Expenditures of Campground Fees, by Year (LVRD UT01 only)**

| <b>Federal Fiscal Year</b> | <b>Staff Labor</b> | <b>Operations Costs</b> | <b>Total Annual Expenditures</b> | <b>Revenues</b> | <b>Net Gain/Loss</b> | <b>Fund Balance</b>    |
|----------------------------|--------------------|-------------------------|----------------------------------|-----------------|----------------------|------------------------|
| 2016                       | \$586,166          | \$275,543               | \$861,709                        | \$994,756       | \$133,050            | \$782,907              |
| 2015                       | \$532,614          | \$322,057               | \$854,671                        | \$975,658       | \$120,987            | \$649,857              |
| 2014                       | \$502,093          | \$270,230               | \$772,323                        | \$814,931       | \$42,608             | \$528,870              |
| 2013                       | \$391,833          | \$269,686               | \$661,519                        | \$666,539       | \$5,020              | \$486,262              |
| 2012                       | \$335,087          | \$260,344               | \$595,431                        | \$563,297       | (\$32,134)           | \$498,199              |
| 2011                       | \$261,240          | \$115,332               | \$376,572                        | \$521,846       | \$145,274            | \$530,162 <sup>1</sup> |

Additional costs to the government of administering the campground program include managerial support, work by recreation planners to address needed improvements and new campgrounds, and office overhead, including information services to the public. These costs are generally borne by the L1220 account (Recreation Management) or the L1660 account (Operations). In 2016, approximately \$307,000 was expended on the campground program from these appropriated funds. This means that the actual costs of operating the campgrounds totaled \$1,168,709. That is, 36% of the campground program costs were borne by appropriated funds in 2016 and only 64% of costs were borne by recreation use fees.

Positive Fund Balance Maintenance

The Moab Field Office strives to maintain a positive fund balance of no less than the average of the expenditures for the prior two years in the UT 01 account. For example, \$854,671 was expended in FY 2015 and \$861,709 was expended in FY 2016, so the average would be \$858,190. Therefore, the Moab Field Office would strive to maintain a positive fund balance of \$858,190 for FY 2017. (See Section F below for further discussion of the Fund Balance for the LVRD UT 01 account). The reason for this goal is to have the flexibility to obtain matching funds in applying for grants, effect emergency repairs, provide long-term stability for staff services, provide capability to meet unanticipated costs or to take advantage of unforeseen opportunities to improve services, and to use revenues to provide future recreation infrastructure to support visitor use. In addition, the fund balance could cover expenses in the case of reduced fee revenue due to unforeseen circumstances, such as natural disasters and environmental or economic change. The Moab BLM needs the ability to retain services to support the local economy during anticipated uncertain times. The fund balance will be managed as a working capital fund, with the goal of investing in facilities and services that will promote program growth consistent with visitor demand through generation of increased revenue.

Maintenance of a positive fund balance is essential because the economy of Grand County is heavily dependent upon the recreational use of public lands. The BLM Moab Field Office plays an essential role in providing recreation opportunities in the Grand County economy. Our business and other partners depend upon the BLM providing safe, clean and attractive camping facilities so that the Grand County economy can prosper. For instance, if campers are not afforded the opportunity to visit Moab, many adventure-based businesses and food services will not have customers.

Headwaters Economics produced an economic study for Grand County in October of 2011 (*The Economic Value of Public Lands in Grand County, Utah*). That study found that at least 44% of the jobs (1,486 of the 3,378 private sector jobs) in Grand County are directly in the recreation

|  |                  |                  |                  |                  |                 |                  |
|--|------------------|------------------|------------------|------------------|-----------------|------------------|
| <sup>1</sup> Project work from this account was consciously reduced during 2011 to increase the Fund Balance to one year's reserve (see Fund Balance goal in next section) |                  |                  |                  |                  |                 |                  |
| 2010   | \$247,017        | \$181,126        | \$428,143        | \$474,883        | \$46,740        | \$384,888        |
| 2009   | \$242,413        | \$189,557        | \$431,970        | \$467,377        | \$35,407        | \$338,149        |
| <b>8-Year Average</b>  | <b>\$387,307</b> | <b>\$235,484</b> | <b>\$622,792</b> | <b>\$684,910</b> | <b>\$62,119</b> | <b>\$524,911</b> |

sector and thus are dependent on public lands. This figure does not include jobs in the government sector that depend upon tourism (including federal, state and local government), nor does it include jobs closely related to tourism, such as grocery stores and specialty shops. The study found that, “it is the robust variety of outdoor activities, largely on public land” that drive the Moab economy (*The Economic Value of Public Lands in Grand County, Utah, page 6*).

### Continuity of Operations

The campground program in the Moab Field Office is one of the mainstays of the Grand County economy; campers utilizing BLM campgrounds support many local businesses. As such, the continuity of its operations is vital not only to individual businesses, but to the entire community. The campground program must continue to operate, even in light of an unexpected or sudden loss of appropriated funds or a decline in fee revenue. The fund balance will be maintained as explained above, and, in addition, the following steps will be taken should appropriated monies (or fees) decline:

- 1) Site construction and improvements would be deferred and maintenance would continue;
- 2) Spending would be focused on key frontline recreation staff;
- 3) Spending on non-revenue producing agreements would be eliminated, reduced or deferred;
- 4) Fee adjustments would be implemented when appropriate to maintain services and program capability;
- 5) The season during which services would be offered would be reduced;
- 6) Low use, non-profitable sites would be closed if necessary to maintain economic health; and
- 7) Other allowable actions would be taken as necessary to maintain a positive fund balance to ensure the continuity of services in the campground program.

Should appropriated funds be greatly reduced or eliminated, the Moab Field Office will take action by managing campground revenues and expenditures to maintain continuity of operations for the program.

### **E. Campground Revenues**

Campground fees are paid by those receiving services in BLM campgrounds. Individual campsites are not reservable at this time; fees are paid at the site by each individual campsite holder. Group sites, which are reservable, are paid for in advance through Recreation.gov.

Campground fees are deposited into a separate recreation fee account established exclusively for Moab BLM campgrounds. Table 6 displays revenues collected in this account for the past five years. It should be noted that, while the number of campers increased by 33.2%, revenues in the same 5 year period increased by 76.6%, indicating that campers were staying in BLM campgrounds for longer periods. Longer stays are an indication of satisfaction with Moab BLM campgrounds.

**Table 6: Recreation Fee Revenues Deposited in the Moab Campground Fee Account**

| <b>Federal Fiscal Year</b> | <b>Campground Visitor Nights (from Table 4)</b> | <b>Revenues</b> |
|----------------------------|---|-----------------|
| 2016                       | 211,698   | \$994,756       |
| 2015                       | 219,716   | \$975,658       |
| 2014                       | 173,373   | \$814,931       |
| 2013                       | 165,917   | \$666,538       |
| 2012                       | 158,890   | \$563,296       |

Source: BLM Collections and Billings System database

## **F. Priorities for Future Expenditures**

It is expected that operating expenditures will increase in out-years, as prices rise and infrastructure ages. This is due to a combination of new infrastructure needs (camping spaces, shade shelters, picnic tables, firerings, and toilets), maintaining existing infrastructure, and the effects of general inflation. For example, an additional campsite can cost up to \$10,000 per site to construct; a concrete cast single vault toilet costs \$25,000. Even without future expansion of services, the costs of operations will continue to increase.

### 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 group sites and individual campsites. This includes maintaining a standard of cleanliness that would promote visitor health and safety. The majority of the funds (75%) for the campground program are derived from the Moab Campground fee account. The level of service includes answering questions from campers on the phone and in person, on-site patrols and fee collection, government vehicle costs, regular maintenance of campground facilities including the toilets, fire grills, bulletin boards, fee tubes, speed bumps, shade shelters and campground roads. In 2016, the Moab BLM expended \$1,168,709 to operate its campground program (\$861,709 in fee money and \$307,000 in appropriated money). This figure represents a baseline amount with which to operate the program, and does not include any increase in services or improvements to the infrastructure. The \$1,168,000 figure includes \$307,000 of appropriated funds, which is not a dependable source of maintenance income.

Consequently, the additional revenues derived from the fee increase and the five new campgrounds will be used primarily for the maintenance of existing services to campers and the provision of new campground capacity. Maintenance includes the continual replacement or major repair of aging campground facilities, such as fire grills, picnic tables, site posts and toilet buildings that deteriorate through heavy use. Through a combination of the projected 2017 fee increase and increased use of the campgrounds, program revenues are expected to increase to \$1,332,500 by 2019. This would be enough money to continue maintenance and operations at the current level if appropriated monies disappeared; if appropriated monies were to continue, this level of revenue would enable the Moab BLM to institute some needed improvements (see Appendix A for a list of needed improvements).

To the degree available, and consistent with maintaining an adequate fund balance, some fee revenues will be directed toward improving campground facilities and providing additional camping opportunities. This is dependent upon continuing appropriation of recreation funds to the Moab Field Office, as well as obtaining grant monies, both internal and external, for project development.

#### Future Expenditures for Program Infrastructure

Major expenditures on projects in support of the campground program include the addition of specialized camping facilities for persons with disabilities, the improvement of campsites including adding tent pads, updating fire rings and improving roads, installation of new toilets, the addition of large shade shelters at all group sites, the addition of individual shade shelters at selected individual sites, the planting of trees in campgrounds, the addition of screening to provide more privacy to campsites, adding amenities such as horse corrals to selected group sites, and improved interpretive and informational signing. By amending the Business Plan to increase the nightly fee and to add five campgrounds to the fee structure, the Moab Field Office could engage in improvements to its infrastructure. As many of the campgrounds were built in the period of 1970 – 1990, there is an increasing need to spend monies to refurbish these aging facilities.

In addition, there is a need to construct the already RAC-approved campgrounds planned for in the 2008 Moab Resource Management Plan, including the Bartlett, Moab Skyway and Entrada Bluffs campgrounds. Campgrounds approved for fee collection by the RAC in 2014 (Fish Ford, Hideout, Cowskin, Bitter Creek and Utah Rims) need promised improvements before fees can be charged. In addition, campground construction will be required for the five campgrounds proposed in this Business Plan (Klondike, Mineral, Black Ridge, Cameo Cliffs and Utah Rims). Other opportunities for campground development, including premium view/special group sites, would also be developed, subject to RAC approval of fees. While most new facilities would be self-supporting at some point, the initial construction would require an expenditure of funds. These improvements and additions are estimated to cost \$9,409,000 (see Appendix A for a list of infrastructure improvements).

#### Revenues Necessary to Maintain Program Services

Projected expenditures include only those necessary for continued program operations and minor improvements. The addition of the five developed campgrounds and the fee increase would not alone result in the near term accomplishment of the larger program infrastructure improvements described in the above paragraph. BLM would continue its long-term efforts to gradually improve physical facilities at campgrounds through a combination of regular appropriated funds, internal one-time program grants, and expenditure of user fees.

The rate increases (from \$15.00 to \$20.00 and from \$4.00 to \$5.00) would result in a total of approximately \$1,550,442 of revenue (an increase of \$546,211 over 2016 revenue) to the Moab Field Office-Moab Campgrounds fee account by the year 2019. The total annual expenditures to maintain the campground program are projected to be \$1,472,013 in 2019. This means that the rate increase would result in only \$78,429 of additional monies to expend campground

improvements. The rate increase would also enable the Moab Field Office to maintain the positive fund balance it has accrued, although it would not enable the Moab Field Office to add to the fund balance. A positive fund balance is a necessary component of operating a viable business; the Moab BLM strives to operate its campground program using sound business practices. See pages 16 – 17 above for a full discussion of the need for maintaining a positive fund balance.

#### Maintenance of Fund Account Balance

It is critical to maintain a positive fund balance in the recreation fee accounts, including that derived from campgrounds, so that the BLM can provide required services, quickly address threats to public health and safety, and allocate some revenue for future investments in campground infrastructure. In normal budget years, regular non-fee program appropriated funds are not available for seasonal employee labor, on-going purchasing, or project work until more than half of the fiscal year has elapsed. A positive fund balance, or working capital fund, is necessary for the recreation program to provide program services to campers throughout the year.

#### **G. Analysis of Recreation Fee Rates**

Moab BLM campground fees have been at their current rate since 2012. If the campground fee increase is approved, the new fee (\$20 per site) would also be applied to the five newly proposed campgrounds. Prior to 2012, the rates had last been increased in 2007 and in 1991; the 2007 increase only covered past inflationary increases, and was not sufficient to deal with the maintenance backlog detailed in Appendix A. In 1991, the Consumer Price Index was 134.6; in 2007, it was 202.4. In 2012, the Consumer Price Index was 226.7. This means that, from 1991 through 2012, costs have increased by 69%. In August 2017, the Consumer Price Index was 245.519, a further increase of 7.82% from 2012.

Since 1991, the Consumer Price Index has increased by 82%. Since that date, the backlog of needed maintenance projects has also increased as the campgrounds have aged and have seen increased, nightly use. Increases in costs have come in every category, including labor, vehicles, equipment, fuel, supplies and facility maintenance. In the past six years, campground fees charged at other public (and private) campgrounds have all increased substantially. This section uses both the cost recovery fee calculation method, as well as describes the fees charged by other offices and/or agencies for campground use, and identifies differences and similarities in services offered.

#### Cost Recovery Fee Calculation Method

Fee rates are based on the concept that revenues should cover a program's operating costs where direct benefits are provided to users. Table 7 shows the operating costs for the campground program over the past 8 years. As has been normally the case, appropriated recreation

management funds paid for a portion of office staff salaries for program administration and site maintenance. Based on staff work month costs in 2016, an estimate was made of appropriated funds used by campground staff in prior years. Costs of the campground program include only direct costs and do not include overhead costs for management services or for office support.

**Table 7: Costs of Operating the Campground Program**

| Federal Fiscal Year   | UT01 Staff Labor | Appropriated Funds Staff Labor <sup>4</sup> | UT01 Operations Costs | Appropriated Funds Operations <sup>5</sup> | Total Annual Expenditures | UT01 Revenues    |
|-----------------------|------------------|---|-----------------------|--|---------------------------|------------------|
| 2016                  | \$586,166        | \$256,000                                   | \$275,543             | \$75,000                                   | \$1,192,709               | \$994,756        |
| 2015                  | \$532,614        | \$250,000                                   | \$322,057             | \$73,500                                   | \$1,178,171               | \$975,658        |
| 2014                  | \$502,093        | \$230,000                                   | \$270,230             | \$72,000                                   | \$1,074,323               | \$814,931        |
| 2013                  | \$391,833        | \$220,000                                   | \$269,686             | \$70,000                                   | \$951,519                 | \$666,539        |
| 2012                  | \$335,087        | \$218,000                                   | \$260,344             | \$66,000                                   | \$879,431                 | \$563,297        |
| 2011                  | \$261,240        | \$212,000                                   | \$115,332             | \$63,000                                   | \$651,572                 | \$521,846        |
| 2010                  | \$247,017        | \$210,000                                   | \$181,126             | \$65,000                                   | \$639,573                 | \$474,883        |
| 2009                  | \$242,413        | \$200,000                                   | \$189,557             | \$65,000                                   | \$696,970                 | \$467,377        |
| <b>8-Year Average</b> | <b>\$356,430</b> | <b>\$224,500</b>                            | <b>\$235,484</b>      | <b>\$68,687</b>                            | <b>\$908,033</b>          | <b>\$684,910</b> |

Using the 8-year averages, Table 7 shows that the fee revenue from group and individual campsite use has funded almost 75% of dollars spent for direct campground expenses with about \$224,500 dollars per year coming from appropriated funds and \$684,911 coming from campground fees. At the current pricing levels (\$15 for individual sites and \$4 per person per night for group sites), the campground program could not meet expenses without a substantial infusion of appropriated funds.

Table 8 shows the estimated annual future operating expenditures necessary to continue existing program services, maintain facilities, and accomplish minor infrastructure improvements. Completion of major infrastructure projects, such as those discussed in Appendix A, would require additional sources of funding, even if a fee increase were to be approved.

**Table 8: Total Annual Expenditures vs. Estimated Revenues in Campground Program<sup>6</sup>**

| Federal | Estimated | Estimated | Staff Labor | Operations | Total |
|---------|-----------|-----------|-------------|------------|-------|
|---------|-----------|-----------|-------------|------------|-------|

<sup>4</sup> An examination of FY2016 allocations show that campground program is funded by about \$256,000 in appropriated funds for labor. Rough estimates of appropriated funding for the past years' campground programs have been made for past year expenditures.

<sup>5</sup> An examination of FY2016 allocations show that the campground program is funded by about \$75,000 in appropriated funds for operations. The difference in yearly operations funding is due to whether or not the pumping and garbage contracts are paid out of 1232 or 1660 (an appropriated fund). Rough estimates of appropriated funding for the past years' campground programs have been made for past year expenditures.

<sup>6</sup> 2016 represents actual figures. 2017 and beyond represents linear trends, extrapolated from the eight year totals in Table 5.



| Fiscal Year | Revenues (assuming fee increase) | Revenues (with no fee increase) | (Fee and appropriated funds) | Costs (Fee and appropriated funds) | Annual Expenditures |
|-------------|----------------------------------|---------------------------------|------------------------------|------------------------------------|---------------------|
| 2019        | \$1,550,442                      | \$1,240,353                     | \$1,018,952                  | \$453,060                          | \$1,472,013         |
| 2018        | \$1,443,626                      | \$1,154,901                     | \$956,315                    | \$430,154                          | \$1,386,469         |
| 2017        | \$1,336,810                      | \$1,069,448                     | \$893,677                    | \$407,248                          | \$1,300,926         |
| 2016        | n.a.                             | \$994,756                       | \$842,166                    | \$350,543                          | \$1,192,709         |

**In conclusion**, if the campground program were to be run on fee revenue alone (that is, without appropriated funding), the current camping fee would be insufficient to cover expenditures. If appropriated funds were to disappear, operations costs would be reduced to cover only basic cleaning and campground services; only very limited capital improvements could occur under this scenario. Without a fee increase, expenditures would exceed revenues in each of the next three years.

The campground fee rate that would generate 100% of the revenues needed to cover the recreation program's full operating costs of the campgrounds without the use of any appropriated funding would be: a) \$20.00 per night for an individual campsite and b) \$5.00 per group site camper. Thus, the requested 2017 increase (from \$15.00 to \$20.00 per site) and the addition of the new campgrounds still requires a continuation of appropriated funds in order to fund any needed improvements as infrastructure ages. The requested fee increase would cover not only the operating costs of the campgrounds but also a small portion of the improvements shown in Appendix A.

#### Fair Market Value Fee Calculation Method

In addition to providing the cost recovery fee calculation method (above), this section of the Business Plan uses the Fair Market Value assessment approach to calculate the required fee changes. The Fair Market Value assessment approach compares the fees charged at similar campgrounds in the Moab area that are being administered by federal and state land management agencies. In addition, fees charged by several privately operated campgrounds are also included for comparison. Table 9 presents the individual site campground fee at various locations.

**Table 9: A Comparison of Campground Fees in the Moab Area (2017)**

| Campground Name           | Agency   | Campground Fee(s)     | Amenities Offered                  |
|---------------------------|----------|-----------------------|------------------------------------|
| <b>Public Campgrounds</b> |          |                       |                                    |
| Proposed BLM              | Moab BLM | \$20 per site for two | Vault toilets, picnic tables, fire |

|  |                              |  |  |
|--|------------------------------|--|--|
| campground fees                                |                              | vehicles (proposed). No entrance or reservation fee. Group sites are proposed at \$5.00 per person per night | grills, parking bays, host services, spacious sites  |
| Arches National Park                           | National Park Service        | \$25 per site + \$25 entrance fee + \$9 reservation fee (NPS proposed entry fee = \$70.)                     | Flush toilets, picnic tables, fire grills, parking bays, paved roads, host services, water |
| Canyonlands National Park (Needles)            | National Park Service        | \$20 per site + \$25 entrance fee + \$9 reservation fee (NPS proposed entry fee = \$70.)                     | Flush toilets, picnic tables, fire grills, parking bays, paved roads, host services, water |
| Canyonlands National Park (Island)             | National Park Service        | \$15 per site + \$25 entrance fee. (NPS proposed entry fee = \$70.)  | Vault toilets, sheltered picnic tables, fire grills, parking bays, paved road              |
| Dead Horse Point State Park                    | Utah State Parks             | \$35 per site + \$8 reservation fee + \$13 for second vehicle at site  | Flush toilets, picnic tables, fire grills, parking bays, paved road, water                 |
| Sand Flats Recreation Area                     | Grand County/BLM Partnership | \$15 per car for 5 ppl. \$2 each additional person; \$5 trailer fee  | Vault toilets, picnic tables, fire grills  |
| Green River State Park                         | Utah State Parks             | \$30 per site + \$15 for a second vehicle + \$8 reservation fee  | Flush toilets, picnic tables, fire grills, parking bays, water                             |
| <b>Privately Owned Campgrounds<sup>7</sup></b> |                              |  |  |
| Portal RV Park                                 | Private                      | \$49.50 for RV (2 people)<br>\$42.50 for tent (2 people)<br>\$3 each additional person                       | Flush toilets, showers, picnic tables, fire grills, parking bays, water, electricity       |
| Moab Rim Campark                               | Private                      | \$42 for RV (2 people)<br>\$25 for tent (2 people)<br>\$5 each additional person<br>\$10 per pet             | Flush toilets, showers, picnic tables, fire grills, parking bays, water, electricity       |
| ACT Campground                                 | Private                      | \$49 for RV (2 people)<br>\$30 for tent (3 people)<br>\$5 for second vehicle                                 | Flush toilets, showers, picnic tables, fire grills, water, electricity                     |
| Moab KOA                                       | private                      | \$53 for RV (2 people)<br>\$33-\$43 for tent (2 people)  | Flush toilets, showers, picnic tables, fire grills, water, electricity (for RV sites only) |
| Moab Valley RV Park                            | Private                      | \$53 for RV (2 people)<br>\$48 for tent (2 people)   | Flush toilets, showers, picnic tables, fire grills, parking bays,                          |

<sup>7</sup> Represents a minimum fee. Does not include taxes or reservation fees. Camping fees also vary by length of vehicle, whether or not a trailer has slideouts, the number of people and/or pets, days of the week and months of the year. Many private campgrounds charge a premium fee for event times such as Jeep Safari, spring breaks or fall weekends. Prices shown reflect the lowest published per night price. Fees can increase greatly with the presence of any of the above factors. For example, most private campgrounds charge extra for any persons over two per site.

|                     |         |  |  |
|---------------------|---------|--|--|
|                     |         | \$5 each additional person   | water, electricity, pool   |
| Canyonlands RV Park | Private | \$50-61 for RV (2 people)<br>\$30-40 for tent (2 people)<br>\$5 each additional person | Flush toilets, showers, picnic tables, fire grills, parking bays, water, electricity, pool |
| Archview RV Park    | Private | \$53-71 for RV<br>\$32 for tent<br>\$5 each additional person                          | Flush toilets, showers, picnic tables, fire grills, parking bays, water, electricity       |

It should be noted that all the campgrounds, both public and private, have raised their rates, oftentimes substantially, since 2014; the last BLM fee increase was in 2012.

Moab BLM campgrounds, unlike many of the campgrounds listed above, provide a very inexpensive camping experience. Since the Moab BLM raised its campground fees by 25% in 2012, campers have benefitted from the continuity of on-going services, facility maintenance and some limited improvements to facilities. The proposed fee increase, combined with the addition of five new developed campgrounds to the fee structure, would help provide operating capital for the maintenance and improvement of the Moab BLM campgrounds. The completion of major infrastructure improvements shown in Appendix A would not likely be completed through this action alone, although if the level of appropriated funds continues, and if the Moab BLM continues its success in applying for internal and external funds, major infrastructure improvements could proceed, even with the modest 2017 increase requested in campground fees.

**In conclusion**, the analysis of the value of the Moab BLM campground fee (including that for the five proposed fee campgrounds) shows that even the \$20.00 rate would be less than the lowest daily rate charged for the use of other campground areas, both public and private (when entrance fees and other fees are included in the price). It is acknowledged that private campgrounds provide services not offered at public campgrounds. It also should be added that lodging rates in hotels, motels and owner-rented units typically range from a low of \$150 to over \$500 per night; rates are increased for popular weekends in spring and fall. Thus, BLM camping provides a very low cost alternative for a Moab-oriented vacation.

#### **H. Impacts from Changing and Not Changing Fees and from Adding and Not Adding Five Fee Campgrounds**

##### Anticipated Impacts from Changing Fees and Adding Campgrounds

###### *Anticipated Results of Increasing Fees from \$15 to \$20*

The campground fee has not been raised since 2012. When it was raised at that time, the rate of increase was not sufficient to keep up with the costs associated with operating a campground program. It was also assumed that the level of appropriated money would remain constant and that the campground program could depend on this source of income. Since that time, the costs of goods, labor and services have continued to increase, eroding the buying power of the campground fee established in 2012. For instance, the toilet pumping fee has risen from \$32,000 to \$83,000 since 2012. As the costs of goods, labor and services increase, the purchasing power of a static campground fee decreases proportionately.

If the fee were raised, services would continue to be offered at a high level in the campground program. Without the fee increase, the frequency of cleaning could be reduced as expenses continue to rise. In addition, with a fee increase, some revenues could be used to gradually improve campground infrastructure as part of routine upgrades. Past instances of these upgrades include improved road access, replacement of substandard toilets, addition of tent pads, replacement of substandard fire rings and the addition of shade shelters. Campground improvements are quite important as many of the BLM campgrounds are reaching an age where replacement of some of the infrastructure is necessary to maintain health and human safety. Until now, the campground fee structure has never considered the replacement costs of this campground infrastructure.

With the increased demand for camping experiences (an increase of 54% between 2012 and 2016), the BLM incurs more expense in terms of effluent pumped, toilet paper supplied, fire rings cleaned and the required frequency of cleaning and maintenance services. That is, when campgrounds are continually utilized from February through November, the frequency of maintenance visits must meet the demand.

Raising the campground fees by 33% would not impact campers, because the fees are already quite low, compared to private and public campgrounds in the area. The fee increase is necessary to maintain the level of service to the campers and to pay for both current and deferred maintenance of the camping facilities. Camping is a particularly low-cost alternative to spending the night in a Moab hotel or motel. Impacts to low-income populations are also not high, as low-income populations are not heavily represented in the BLM camper population.

#### *Anticipated Results of Adding Five Campgrounds*

Adding five new campgrounds to the fee program would add camping opportunities at five widely separated locations. These new campgrounds would be developed and added to the fee structure. The fees collected at the five new developed campgrounds included in this amended Business Plan would ensure that services could be offered at these and other locations. In addition, some revenues could be used to gradually improve campground infrastructure as part of routine upgrades. Providing organized camping opportunities would also lessen the impacts of the unrestricted dispersed camping that is occurring at these five locations. Providing organized camping would mean that new routes are not created, human waste is properly disposed of, garbage is collected and fire rings are provided and ash removed. Minimizing such impacts would in turn provide a more pleasant camping experience and decrease resource damage.

As the data presented above illustrates, there is increased demand for camping experiences on Moab BLM lands, and the addition of approved campgrounds is needed to meet the demand for campground services.

#### *Benefits to the Local Economy from Increasing Fees and Adding Campgrounds*

As explained above, the Grand County economy is heavily dependent upon tourism. Many tourists prefer to camp at public campgrounds; capacity at the two National Parks' campgrounds

is exceeded for the majority of the year. These campers rely on BLM campgrounds. Many tourists would be unable to come to Moab if it were not for the availability of reasonably-priced BLM campgrounds. This is particularly true for group site campers, as many youth groups could not afford to stay at area motels. The Headwaters Economics (2011, updated in 2015) study, *The Economic Value of Public Lands in Grand County*, found that the economic impact resulting from expenditures on BLM Lands in Grand County by non-local visitors (which includes BLM campers) amounted to \$177,080,722. Furthermore, the study found that the attraction of Grand County is the *variety* of recreation opportunities that it can offer the visitor. It is important to the local economy to keep campground infrastructure in good condition, and to service and clean facilities to a high standard.

#### *Benefits to the Environment from Increasing Fees and Adding Campgrounds*

The campground fee enables the Moab BLM to operate the camping program. This serves to reduce negative impacts to sites and to resources associated with higher levels of visitation in small areas. By providing campgrounds for visitors, the BLM is able to contain impacts to these small areas. Human waste generated by campers is contained and processed properly at approved facilities. Garbage is collected and disposed of at a proper facility. Campfires are contained in metal rings, enhancing fire safety; ash is disposed of properly. Prior to the 1990's, the Moab BLM had no campgrounds along the Colorado River; at that time, the State Health District asked that the BLM either prohibit camping along the river, or provide campground facilities. The proposed camping fee charged for these facilities will make their construction and maintenance possible, thus benefiting the environment.

The need for camping facilities in the vicinity of the five proposed new locations is particularly acute. At each of the five locations (North Klondike, Mineral, Black Ridge, Cameo Cliffs and Utah Rims), a great deal of "dispersed camping" is occurring in undeveloped areas without toilets, garbage service or proper fire containment. "Dispersed" campers are concentrated within close proximity of each other because the supply of hardened campgrounds does not meet the demand of Moab-bound campers. (The desire of most Moab-bound campers is to be as close to Moab as possible.) The same dispersed campsite is often used at least 100 nights per year. When the site gets dirty or is already occupied, campers create another nearby site, thus broadening the environmental impact. Visits to each of the locations shows increased environmental impacts from unrestrained camping. The addition of the five developed camping facilities would mean that vehicles would be limited to roads, human waste would be contained in a toilet and disposed of at an approved sewage facility, fires would be built only in metal fire rings and garbage would be collected and disposed of properly.

Each of the five proposed campgrounds would be built and have the following expanded amenity requirements: toilets, picnic tables, fire rings, tent/trailer spaces, access roads, collection of fees by an employee, reasonable visitor protection and garbage collection.

#### *Socioeconomic Impacts from Increasing Fees and Adding Campgrounds, including those to Low-Income Populations*

Those who vacation away from home are more likely to be above-average in income. The 2007 NVUM study (which studied all recreation visitors, not just campers) found that over 80% of visitors to Moab BLM were from outside the area, indicating that their travel to Moab was economically discretionary. The NVUM study further asked visitors to report their household incomes by category. The following data was gathered:

**Table 10: Percent of Moab BLM Visits by Household Income Categories**

| Annual Household Income Categories |   | BLM Visits (%) |
|------------------------------------|---|----------------|
| 2006 Reported Values               | Income 2017 Values (inflation adjusted) |                |
| Under \$25,000                     | Under \$30,000                          | 14.7           |
| \$25,000 - \$49,999                | \$30,000 – \$59,998                     | 25.3           |
| \$50,000 - \$74,999                | \$60,000 – \$89,998                     | 16.4           |
| \$75,000 - \$99,999                | \$90,000 - \$119,998                    | 9.7            |
| \$100,000 - \$149,999              | \$120,000 - \$179,998                   | 22.6           |
| \$150,000 and over                 | \$180,000 and over                      | 11.3           |

Furthermore, BLM campgrounds offer a very low-cost alternative to staying in a motel in Moab (where prices range from \$150 to \$500 per room per night during the season). This low cost alternative is particularly important at the group sites, where groups can enjoy the amenities of the Moab area at a very low cost.

As with the other fee campgrounds, the addition of the five new campgrounds to the fee program would not negatively impact campers, because the fees would be kept quite low at \$20 per site (it should be noted that, unlike a private campground, the \$20 fee includes two vehicles, up to 10 people and pets). Furthermore, there is a 50% discount on camping fees afforded to seniors and those with disabilities. Impacts to low-income populations are also not high, as low-income populations are not heavily represented in the BLM camper population. However, the BLM camping experience is still the most cost-effective alternative in the Moab area; this is important when seeking to attract a more diverse visitor base to attractions offered by public lands.

**Anticipated Result of Not Changing the Fee and Not Adding the Five Campgrounds to the Fee Program**

*Negative Impacts to Recreational Users*

The BLM campgrounds are reaching an age where replacement costs of infrastructure will be increasing. For instance, most of the site posts at individual campsites are beginning to rot, since they have been in the ground for almost 20 years. A contract study that examined facilities in the BLM Facilities Asset Management System (FAMS) pointed out that the campground fees in the Moab Field Office did not account for the full replacement costs of campground infrastructure. The study found that the fee structure was based only on operational costs and did not include necessary replacement of facilities as they deteriorated. The requested fee increase and the fee for the five new campgrounds would be partially used to cover replacement costs of campground infrastructure. A failure to increase the campground fee would mean that aging infrastructure

would not be replaced in a timely manner to maintain site quality; it would also mean that improvements, such as individual picnic table shade shelters, would not be added.

#### *Negative Impacts to Local Economy*

Not increasing the campground fee and not adding five new campgrounds would lead to the erosion of services, such as frequency of cleaning, at campgrounds. This would eventually impact the recreation sector of the Grand County economy, making people less likely to camp on Moab BLM lands. Vacation dollars are entirely discretionary; people can spend their vacation dollars in many different locales. Should people be less likely to recreate in Moab because of poor or unmaintained facilities, the Grand County economy, which is heavily dependent upon tourism, would suffer.

#### *Negative Impacts to the Environment*

Moab BLM campgrounds were established in the early 1990's to address the negative impacts to the environment resulting from unrestrained dispersed camping. Dispersed sites were rampant on BLM lands within a 30 miles radius of Moab, resulting in deleterious impacts to wildlife, riparian resources, water quality, floodplains, cultural resources and the enjoyment of other recreation visitors. The human sanitation problem had deteriorated so that the State of Utah informed the Moab BLM that it should either build campgrounds along the Colorado River or shut down all camping along that river. Failure to maintain the campground program would result in the reestablishment of many of the negative impacts to environment that provided the initial impetus to the campground program. For example, should the BLM be unable to regularly service toilets along the river (all routine cleaning costs are paid by the Moab Campground Fee Account), people would be less likely to utilize toilets. Additionally, recreation maintenance staff (funded almost entirely by fees) conduct site cleanup and weed control; a fee decrease would mean that such work would be reduced. This would lead to negative impacts to the environment.

The failure to add the five campgrounds to the fee program would lead to even more environmental impacts at the requested locations. Since the opening of the North Klondike bike trails, there has been an explosion of dispersed camping at that location. Currently, campers are driving off-road to camp wherever they choose; campsites are being created, stone fire rings are multiplying and the visual impact of these dispersed campers diminishes the scenery that people have come to see. Campers generally do not bring portable toilets, so human waste is proliferating in a destination area. The Moab RMP created a Mountain Bike Focus Area in the North Klondike area; the mountain bike experience has been lessened by the presence of so many dispersed campers.

Similarly, dispersed camping has greatly increased along the Mineral Road. This use is due to overflow from the State Route 313 campgrounds, Dead Horse Point and Canyonlands National Parks as well as the recreation activities occurring on that road. These activities include the long-standing White Rim bicycling and Labyrinth Canyon canoeing and boating, as well as the newer activities of basejumping, slacklining and highlining that have established themselves along the Mineral road. Dispersed camping along this road is leading to environmental impacts, as campers have no toilet facilities, often burn existing vegetation and do so in inadequate fire containment facilities. In addition, many campers drive off road to get to desired camping locations. When a dispersed campsite is trashed, campers generally move on to create another

campsite. There has been a noticeable diminution of the environment along the Mineral road due to unrestrained camping.

Although camping is limited to designated sites in the Black Ridge area, campers generally expand the designated site to include as many vehicles and people that are in their group. Especially in spring, the Black Ridge area sees very large camps, with up to ten or 12 vehicles in a site. Although much of the surrounding environment has been helped because campers are restricted to a set of sites, the area immediately around the designated campsites is seeing heavy use and a great deal of damage. The installation of a developed campground would lessen this impact by restricting camping to a single, set location.

As the popularity of the Cameo Cliffs/Hook and Ladder OHV area grows, the demand for camping facilities at the location also grows. Currently, people are pulling their trucks and trailers off wherever a flat spot can be found. The installation of a hardened campground would lessen these impacts.

The Utah Rims area is popular with many types of recreationists; the demand for camping facilities has grown throughout the years. Recreationists are choosing sites inappropriately and causing cross country damage by driving in search of campsites. The installation of a campground would lessen these impacts and increase the visual attractiveness of the area.

*Negative Socioeconomic Impacts, including those to Low-Income Populations*

Low-income populations do not generally choose to vacation in Moab, partly due to the high prices of commercial lodging, although some group site reservations are held by groups looking for an inexpensive vacation. Were fees to erode such that the group sites could not be maintained or serviced, the group site opportunity might have to be curtailed. Failure to offer these low-cost group sites to youth groups, Scout groups and other such assemblages could have negative impacts on lower-income populations.

Nonmarket Values and Benefits

The term nonmarket values refers to the benefits individuals attribute to experiences of the environment or uses of natural and cultural resources that do not involve market transactions and therefore lack prices. Examples include the benefits received from wildlife viewing, hiking in a wilderness, camping in a semi-wild setting with friends and family, or recreational hunting. Nevertheless, such values are important to consider because they help tell the entire economic story. Estimates of nonmarket values supplement estimates of income generated from commodity uses to provide a more complete picture of the economic implications of proposed resource management decisions.

Economists measure nonmarket use values by estimating the “consumer surplus” associated with these activities. Consumer surplus is defined as the maximum dollar amount, above any actual payments made, that a consumer would be willing to pay to enjoy a good or service. For instance, hikers pay a market price for gasoline used to reach a trail, but may pay nothing to use the trail. Similarly, campers may pay a fee for this activity, but may be willing to pay more due to the “free” economic benefit accruing to this experience. Any amount that a recreationist



would be willing to pay to use this otherwise free or underpriced resource represents the nonmarket consumer surplus value of that resource to that consumer.

Nonmarket use values have been studied extensively for a wide variety of recreation “goods.” A recent study<sup>8</sup> commissioned by the U.S. Forest Service (USFS) examined studies designed to measure consumer surplus for a wide variety of recreation activities that typically occur on USFS lands, including camping at developed sites. Although the examined studies show a large degree of variation across geographies, they do show considerable degrees of consumer surplus for the studied activities. Of interest to the current project, the authors determined that camping in developed campgrounds on USFS land produced an average consumer surplus of \$46.47 per visitor day. This represent the amount of benefit campers are receiving *above and beyond* the actual fee charged. Although one may quibble with the various methodologies these studies employ, it is clear that recreationists are deriving value well beyond the fees charged.

### Managing for Positive Campground Program Results

The goal of the campground program in the Moab Field Office is to meet increasing demand for campground services. In order to meet the demand, the Field Office will seek to increase campground revenues by managing for positive results for the following three groups: BLM campers, both individual and group, the local community and the BLM. Campers at BLM campgrounds provide a business base for many local entrepreneurs, as the campgrounds bring customers directly to the local community.

The campers benefit by:

- (1) having a low-cost campsite or group campsite available for their use
- (2) improved public lands facilities (i.e. clean toilets)
- (3) outstanding camping-based recreation opportunities
- (4) a focused opportunity to enhance outdoor skills, build group and family relationships, and introduce youth to the world of nature
- (5) venues at which to enjoy their public lands

The local community benefits by:

- 1) the development of business opportunities in the outdoor recreation sector (i.e. river running companies, guide services)
- 2) the development of business opportunities in the general retail sector (i.e. grocery stores, gear stores)
- 3) the development of business opportunities in the hospitality sector (i.e. restaurants)
- 4) the provision of jobs for its citizens and tax revenues for local government
- 5) improved services and quality of life through facility development and resource protection

The BLM benefits by:

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<sup>8</sup> Rosenberger, Randall S.; White, Eric M.; Kline, Jeffrey D.; Cvitanovich, Claire. 2017. Recreation economic values for estimating outdoor recreation economic benefits from the National Forest System. Gen. Tech. Rep. PNWGTR-957. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station

- 1) meeting its land management goals, including protection of cultural and natural resources
- 2) partnering with campers as stewards of the public lands
- 3) providing for a more stable (and hence knowledgeable) BLM work force
- 4) lowering costs by developing improved business management systems
- 5) obtaining revenues to use for program management and facilities enhancement.

The positive results summarized above allow campers to vacation on BLM lands in a responsible manner. The Moab BLM hosts 2.4 million visitors, many of whom choose to camp. The traditional BLM dispersed camping model cannot work when that many people wish to camp in the same location with no toilets, trash service or other services. As users of the public lands themselves, campers have a vested interest in their sustainability. The local community gains in its most important economic sector, and participants and the public benefit by increased opportunities to enjoy public lands.

The achievement of positive campground program results requires adequate funding to provide necessary services. Presently, in addition to funds provided through the BLM budget process, the Moab Field Office collects fees due to the government from individual and group site campers to maintain and enhance visitor services. However, these fees are not sufficient to cover costs, which have continued to increase. In addition, campers at the five locations listed above do not currently pay fees to assist in the protection of those lands through providing toilets and other facilities. Continuing actions include the publication of supplemental rules, field patrols, maintenance and campground host services, as well as provision of toilets and other hardened facilities.

To protect campers, the public, and the public lands, continual efforts are undertaken to ensure that campground fees are paid by all. Those who do not pay the requisite fee are imposing on the honest people who do pay. Campground hosts, recreation personnel and law enforcement personnel check campground fee permits of all users to ensure compliance with the payment requirements.

## **I. Public Outreach**

As part of the proposal to increase the campground fee and add five campgrounds to the fee structure, the Moab Field Office conducted the following outreach efforts to notify the public of its opportunity to review and provide comments:

- Posted the Draft Business Plan on the BLM Utah websites;
- Published a news story in the *Moab Sun-News*;
- Issued a News Release to statewide print and broadcast media.
- Posted the fee increase proposal at existing campgrounds

Prior to building and charging at the five new campgrounds, the following outreach will occur:

- Publishing a Notice of Intent in the *Federal Register*
- Publishing news stories about the *Federal Register* Notice of Intent

- Posting *Federal Register* notice near each of the five campgrounds

As a result of this outreach, six commenters submitted comments (one commenter submitted twice). Two commenters expressed full support for the fee increase. The Western Slope No-Fee Coalition objected to the additional campgrounds proposed in this Plan; one private commenter echoed this objection. One commenter suggested that the fee increase apply only to non-Utah residents, and one commenter asked that the fee increase be phased in by raising the fee one dollar per year for five years.

The Moab Field Office presented the campground fee increase proposal to the BLM Utah Recreation Resource Advisory Council (RAC) for its formal review on May 22, 2018 after publishing a notice in the Federal Register Notice 30 days in advance of the meeting. The Utah RAC is a 15-member advisory panel which provides advice and recommendations to the BLM on resource and land management issues for 22.9 million acres of public lands in Utah. The FLREA mandates that the appropriate Recreation RAC reviews all BLM recreation fee proposals prior to approval. Comments from both the public at large and the BLM Utah RAC were considered prior to approval of the increase in the Moab BLM campground fee.

The public will be kept informed of the expenditure of its fee monies by posting on the Utah BLM website, as well as a compilation of improvements accomplished at various campgrounds.

#### **Moab Field Office Recommendation**

After careful consideration of the fee program and the anticipated revenues and expenditures outlined in the *BLM Moab Campgrounds Business Plan*, the BLM Moab Field Office recommends increasing the nightly individual campsite to \$20 and the per person fee for group site users to \$5. In addition, to reduce resource damage and to provide camping experiences to the public, the Moab Field Office recommends adding the following five campgrounds to the fee campground program. Fees would be charged at the same nightly rate as the other BLM campgrounds.

North Klondike - \$20.00 per site

Mineral Campground - \$20.00 per site

Black Ridge Campground - \$20.00 per site

Cameo Cliffs/Hook and Ladder Campground - \$20.00 per site

Utah Rims - \$20.00 per site

Furthermore, the Moab Field Office recommends that if the Consumer Price Index were to increase by 20%, the campground nightly fee would be raised to \$25.

#### **BLM Resource Advisory Council Action**

The Resource Advisory Council approved the following actions:

- 1) a campground fee increase up to \$25.00
- 2) establishment of five new fee campgrounds

**The Resource Advisory Council did not approve the request for an automatic fee increase tied to a rise in the Consumer Price Index.**

**Appendix A: Specific Site Related Future Expenditures: 5 Year Plan (Total = \$9,609,000)**

**Sites Utilized by Campers that Require Improvements in the Moab Field Office  
(capital improvement only; no maintenance costs are included)**

1. Improved infrastructure at the majority of the 33 campgrounds operated by Moab BLM: (\$1,729,000 for materials; estimated labor costs = \$800,000: total cost = \$2,529,000)
  - a. New concrete-cast toilets at all campgrounds with wooden surround toilets (12 toilets at \$22,000 apiece = \$264,000)
  - b. Replacement of all old-style fire grills with accessible fire grills (200 at \$500 apiece = \$100,000)
  - c. Replacement of site posts at each campsite (450 posts at \$20 apiece = \$9,000)
  - d. Replacement of older bulletin boards at various campgrounds (20 bulletin boards x \$1000 apiece = \$20,000)
  - e. Improvement of host sites to include solar panels (6 sites x \$20,000 = \$120,000)
  - f. Replacement of picnic tables at sites with older-style and weathered tables (250 sites x \$1100 = \$275,000)
  - g. Enhancement of accessible facilities at selected campgrounds (5 sites x \$100,000 apiece = \$500,000)
  - h. Improvement of landscaping and provision of shade trees in campgrounds (5 campgrounds x \$25,000 apiece = \$125,000)
  - i. Improvement of road surface (additional gravel) at various campgrounds (10 campgrounds x \$30,000 = \$300,000)
  - j. Improvement of overflow camping area at Big Bend Campground (one project x \$25,000 = \$25,000)
2. Improvements at reservable group sites (\$440,000 for materials; estimated \$280,000 for labor)
  - a. Construction of shade shelters at all group sites lacking a shelter (8 sites x \$15,000 = \$120,000)
  - b. Improved toilet facilities (adding toilets to heavily used group sites) (10 additional toilets at \$22,000 apiece = \$220,000)
  - c. Construction of accessible group site to accommodate Daily boaters (1 site = \$100,000 – includes toilet, picnic tables and fire rings)
3. New infrastructure at existing campgrounds (\$760,000 for materials; \$400,000 for labor)
  - a. Addition of tent pads at individual campsites (200 sites x \$800 = \$160,000)
  - b. Addition of shade shelters at individual picnic tables, including host sites (300 sites x \$2,000 = \$600,000)
4. New campground construction to provide additional opportunities for camping (\$3,650,000 for materials; \$1,550,000 for labor)

- a. Construction of the following already-RAC approved campgrounds: Entrada Bluffs, Bartlett, Moab Skyway (3 campgrounds x \$200,000 = \$600,000)
- b. Construction of Premium Group Sites (up to 50) throughout field office (50 sites x \$30,000 per site = \$1,500,000)
- c. Construction of five additional future campgrounds (5 additional campgrounds x \$160,000 = \$800,000)
- d. Upgrade the fee campgrounds at Cowskin, Hideout, Fish Ford, Bitter Creek and Rock Castle by building new toilets, replacing fire rings and providing new picnic tables (5 campgrounds x \$150,000 = \$750,000)

It is to be noted that all the above sites will require maintenance services on at least a biweekly basis. With the addition of new campgrounds, it may be necessary to hire additional maintenance workers, at a salary of approximately \$45,000 per worker per year. Additional worker costs are not included in the Business Plan under "future expenditures".

## References

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