

BLM Kingman Field Office Amenity Fee Sites Business Plan



May 2024

Table of Contents

1.0 Recommendation and Approvals	3
2.0 Dear Reader Letter	4
2.1 Executive Summary	
3.0 Background and Authorities	9
3.1 Background	9
3.2 Authorities	9
4.0 Introduction to the Kingman Field Office Fee Program	10
4.1 Kingman Field Office Overview	10
4.2 Visitor Demographics	
5.0 Fee Sites Overview	
5.1 Description of Kingman Field Office Recreation Fee Sites	
5.2 Determination of Recreation Site Eligibility for Fee Collection	
6.0 Proposed Fee Increase	19
6.1 Fee Proposals	19
6.2 Fee Comparison	26
6.3 Proposed Fee Increase	28
6.4 Future Fee Increases	29
6.5 Consequences of Changing and Not-Changing Fee Rates	29
6.6 Use of E-commerce at Kingman Field Office Fee Sites	34
7.0 Revenue and Operating Costs	34
7.1 Summary of Operating Costs – FY19 thru FY23	34
7.2 Summary of Known and Anticipated RFC Revenues	36
7.3 Anticipated Deferred Maintenance (DM) Projects	37
8.0 Priorities for Future Expenditures	37
9.0 Public Outreach	39
9.1 Outreach Methodology	39

10.0 References	4	łO
Appendix A - List of Figures	4	11
Appendix B - List of Tables	4	11
Appendix C - Tables	4	ļ 2

1.0 Recommendation and Approvals

Business Plan: Kingman Field Office (KFO) Amenity Fee Sites

Work Breakdown Structure (WBS): LVRDAZ060000

Recommended by:

This business plan was prepared by the Bureau of Land Management (BLM)'s KFO pursuant to the Federal Lands Recreation Enhancement Act (FLREA) of 2004 (16 U.S.C. 6801-6814) and BLM recreation fee program policies. It establishes future management goals and priorities for the Burro Creek, Wild Cow Springs, and Windy Point Campgrounds within the KFO.

Amanda M. Dodson	Date
Field Manager	
Kingman Field Office	
Reviewed by:	
William Mack, Jr.	Date
District Manager	
Colorado River District Office	
Approved by:	
Raymond Suazo,	Date
Arizona State Director	

2.0 Dear Reader Letter



United States Department of the Interior



BUREAU OF LAND MANAGEMENT Kingman Field Office 2755 Mission Boulevard Kingman, Arizona 86401-5308 www.blm.gov/arizona

In Reply Refer to:

2932 (C010)

Dear Reader:

The Bureau of Land Management (BLM), Kingman Field Office (KFO) is revising the Kingman Amenity Fee Sites Business Plan (2009), hereinafter referred to as the Draft Business Plan. The Federal Lands Recreation Enhancement Act (FLREA) authorizes the BLM to collect fees for recreational use of certain public lands and related waters meeting criteria found at 16 United States Code (U.S.C.) Part 6802(f) and (g)(2). FLREA also enables BLM to retain fees collected as identified in this Draft Business Plan for expenditure at the site of collection (16 U.S.C. Part 6806(c)(1)(a)). This Draft Business Plan provides the public with the opportunity to examine and comment on proposed fee increases. and how KFO plans to utilize fee revenues in the future.

The Draft Business Plan outlines the following proposed fee changes at the Burro Creek, Wild Cow Springs, and Windy Point Campgrounds and describes the analyses of recreation fee rates, operation and maintenance costs, and projected revenue and expenditures.

- The Burro Creek Campground individual site would increase from \$14.00 to \$28.00 per night upon approval of this business plan.
- The Burro Creek Campground group site would increase from **\$50.00 to \$80.00 per night** upon approval of this business plan.
- The Burro Creek Campground RV dump station fee would increase from **\$10.00 to \$15.00 per RV** upon approval of this business plan. Use of the RV dump station at Burro Creek would remain free with the purchase of an overnight camping permit.

- The Wild Cow Springs Campground individual site would increase from **§8.00 to §20.00 per night** upon approval of this business plan.
- The Wild Cow Springs Campground group site would increase from **\$20.00 to \$30.00 per night** upon approval of this business plan.
- The Windy Point Campground individual site would increase from **\$8.00 to \$20.00** per night upon approval of this business plan.

The BLM seeks your review and comment on the Draft Business Plan for the KFO. The KFO will be accepting comments on the Draft Business Plan until June 12, 2024.

To ensure your comments will be considered, you must submit them in writing to the KFO by the last day of the public comment period (June 12, 2024). Please include your address, phone number, email address, or other personal identifying information with your comment. Please be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. BLM will not consider anonymous comments.

You may submit your comments in writing in the following ways:

- Mail or hand-deliver comments to the Kingman Field Office at 2755 Mission Blvd., Kingman, AZ 86401
- Submit comments via email to mdriscoll@blm.gov
- Comments submitted via email shall contain the following in the subject line: "BLM KFO Fee Increase Comment"

Thank you for taking the time to assist BLM in public land management planning. If you have any questions regarding management of the KFO Amenity Fee Sites, please contact Matthew Driscoll, Outdoor Recreation Planner, by email at mdriscoll@blm.gov or by telephone at 928-718-3736.

Sincerely,

Amanda M. Dodson Field Manager

2.1 Executive Summary

The BLM's Kingman Field Office (KFO) is proposing to revise its Business Plan for the Burro Creek, Wild Cow, and Windy Point Campgrounds pursuant to the Federal Lands Recreation Enhancement Act (FLREA) of 2004. The purpose of this business plan is to document fee collection authorities, provide an overview of the KFO fee program, outline the three campground's operational and financial needs, present proposed fee increases to the public, and provide the public with the opportunity to comment on the BLM's proposal.

As outlined in Section 5.2 of this business plan, the three campgrounds covered by this business plan meet the requirements outlined in FLREA to charge an expanded amenity fee. Fees charged at the sites pursuant to FLREA have been retained at the KFO since 2004. Use of these fees has been guided by the Kingman Amenity Fee Site Program Business Plan which was last updated in 2009 and focused on maintenance of existing facilities, enhancement of the campground host program, environmental education, and facility improvements across the three campgrounds.

The KFO is proposing to raise all fees currently charged based on the fair market value and full cost recovery fee analysis completed as part of this proposed fee modification. The current fee schedule and proposed fee increase at each of the campgrounds is as follows:

- The Burro Creek Campground individual site would increase from \$14.00 to \$28.00 per night upon approval of this business plan.
- The Burro Creek Campground group site would increase from **\$50.00 to \$80.00 per night** upon approval of this business plan.
- The Burro Creek Campground RV dump station fee would increase from **\$10.00 to \$15.00 per RV** upon approval of this business plan. Use of the RV dump station at Burro Creek would still be free with purchase of an overnight camping RUP.
- The Wild Cow Springs Campground individual site would increase from **\$8.00 to \$20.00 per night** upon approval of this business plan.
- The Wild Cow Springs Campground group site would increase from \$20.00 to \$30.00 per night upon approval of this business plan.
- The Windy Point Campground individual site would increase from **\$8.00 to \$20.00** per night upon approval of this business plan.

As described in Section 6.2 of this document, proposed fee increases were primarily determined based on fair market value calculations of 18 comparable sites. On average,

overnight camping for individual sites under the fair market analysis fee determination would increase fees \$14.83 while the RV dump station fee at the Burro Creek Campground would increase \$6.25. Group site camping used a combination of fair market value and full cost recovery analysis to substantiate the proposed fee increase. The Burro Creek group site closely correlated to the full cost recovery model and similar sites located within the same geographic area. Wild Cow Springs group site did not readily compare to sites in the area due to lack of group developments. The site provides for groups, but the amenities more closely match that of individual sites, therefore the average individual rate increase was applied.

Section 6.4 describes the process that would be used to increase fees at all the sites covered under this business plan. Fees could be raised by 20% when the Consumer Price Index for All Urban Consumers (CPI-U) increases by 20% from the date of approval of this business plan. The KFO would continue to evaluate future fee increases to ensure that fees charged are reasonable and appropriate to continue providing equitable experiences.

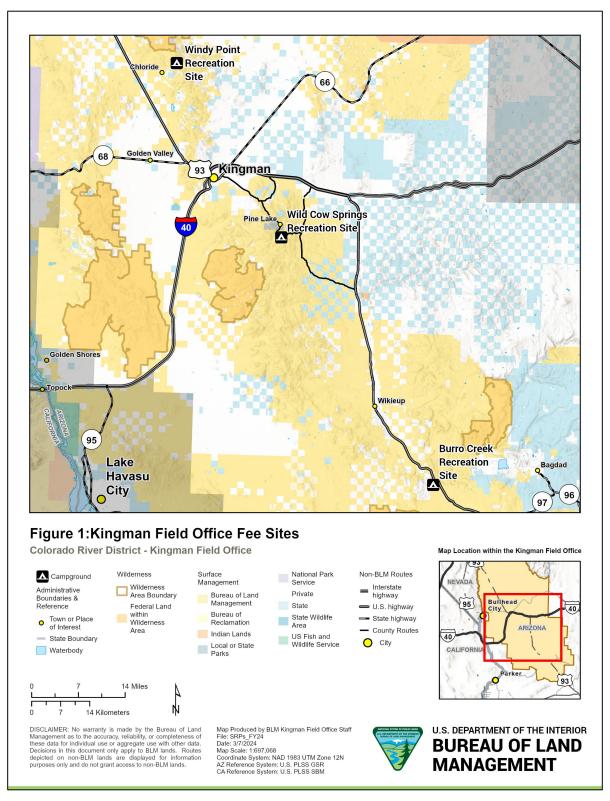


Figure 1

3.0 Background and Authorities

3.1 Background

The KFO manages four developed campgrounds, three of which (Burro Creek, Wild Cow Springs, and Windy Point Campgrounds) collect fees pursuant to the FLREA of 2004 (Public Law (P.L.) 108-447; Title VIII, Section 801; 16 U.S.C. 6801-6814). As a result of FLREA, the KFO developed the subsequent Kingman Amenity Fee Sites Business Plan, approved November 2009 which set the current fees and guided expenditures of sitegenerated revenues over the last 14 years. The campgrounds covered by this plan satisfy the requirements contained in section 6802(g)(2)(A) of FLREA as outlined in Section 5.2 below.

3.2 Authorities

Prior to the passage of FLREA, these sites collected and retained fees under Section 315 of the Department of the Interior and Related Agencies Appropriations Act of 1996, as amended, commonly referred to as the Recreation Fee Demonstration Program. As part of the Recreation Fee Demonstration Program, the KFO began collection and retention of fees in October 1998 and subsequently prepared the Kingman Recreational Areas Business Plan approved September 1999.

This business plan is being prepared to replace the 2009 Kingman Amenity Fee Sites Business Plan and serves to modify existing fees per section 6802(a) of FLREA and policy contained in BLM Handbook 2930-1, BLM Recreation Permit and Fee Administration. This business plan has been prepared to meet the criteria defined in FLREA. The authorities and regulations for this business plan are:

- The Federal Land Policy and Management Act (FLPMA) of 1976, (P.L. 94-579; 43 U.S.C. 1701-1787), 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) of 2004 repealed applicable portions of the Land and Water Conservation Fund Act and replaced BLM's authority to collect recreation fees. 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.

 Title 43 Code of Federal Regulations, Part 2930 (43 CFR 2930) Permits for Recreation on Public Lands contain the regulations governing BLM's recreation permitting program.

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

- BLM Manual 2930, Recreation Permits and Fees, Rel. 2-296 dated October 22, 2007
- BLM Handbook 2930-1, Recreation Permit and Fee Administration Handbook, Rel. 2-300 dated November 17, 2014

The BLM strives to manage recreation and visitor services to serve diverse visitor recreation demands while maintaining sustainable conditions to conserve the public lands. This helps ensure the visitors' desired recreation choices remain available. The BLM's goals for delivering recreation benefits from BLM-administered lands and waters to the American people and their communities are to:

- 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.

4.0 Introduction to the Kingman Field Office Fee Program

4.1 Kingman Field Office Overview

The KFO manages approximately 2.4 million acres of public land in northwestern Arizona (figure 1, page 8). These public lands lie primarily within the 9th Congressional District, with a portion of the lands located within the 2nd Congressional District. The campgrounds covered under this business plan are located entirely within the 9th Congressional District. The KFO is part of the BLM's Colorado River District (CRD).

The Kingman Record of Decision (ROD) and Resource Management Plan (RMP) (BLM 1995) provides high-level oversight of four developed campgrounds, three of which are covered in this business plan (Burro Creek, Wild Cow Springs, and Windy Point

Campgrounds). The public lands administered by the KFO are in proximity or adjacent to other recreational points of interests including the Colorado River, Historic Route 66, Grand Canyon West (GCW), Sedona, Grand Canyon National Park (GCNP), Lake Mead, and Lake Havasu which exposes the area and the diversity of recreational settings to transitory visitors who often come back to the area to recreate solely on KFO administered public lands.

The expanse and geographic location of the KFO provide visitors with a diversity of year-round experiences and outcomes that exist primarily due to topography (Casey, et al. 2021). Winter visitors enjoy recreating in high-elevation Mojave and Sonoran deserts that offer a variety of historical, aesthetic, and niche recreational opportunities including motorized and non-motorized experiences, general exploration (touring), photography, picnicking, spiritual renewal activities, hunting, and organized group activities (Casey, et al. 2021). Summer visitors enjoy participating in similar recreational opportunities as winter visitors, but in surrounding high elevation mountain ranges which concentrates use above approximately 4,000 feet elevation while use in the lower Mojave and Sonoran deserts greatly recedes.

In addition to BLM administered lands, visitors are afforded recreation opportunities managed by local municipalities, Mohave County, Arizona State Parks, National Park Service, numerous privately managed sites, and to a lesser extent the United States Forest Service. These other outdoor recreation service providers offer primarily front-country oriented experiences that are easily accessible by a vehicle.

In Fiscal Year (FY) 2023, total visitation to the KFO eclipsed 1.1 million visitors (BLM 2024) an increase of just under 5% from FY22. Average visitation over the last five years totaled 947,210 visitors while average visitation over the last 10 years totaled 760,726 visitors, a variance of 186,484 visitors. From FY19 to FY20, visitation jumped nearly 34%, a statistical outlier attributed to the COVID-19 pandemic. Visitation has increased on average 11% each year over the last 10 years, and it is anticipated that increasing visits and interest in recreational use of the public lands would continue to occur at this same pace for the next five years. Increase in demand for outdoor recreation could be loosely attributed to increase in general population within Mohave County and Arizona, which has increased by 5% and 12 % respectively in the last 10 years (USCB, 2024a and 2024b).

4.2 Visitor Demographics

4.2.1 Socioeconomic Information of Primary Visitors

As many visitors identify as local (Casey, et al. 2021), the demographic characteristics of Mohave County residents are outlined as the primary visitor. Mohave county has a diverse population of approximately 212,000 residents (U.S. Census Bureau 2024b) with a

mix of urban and rural areas. The county's population has been growing steadily in recent years, driven by factors such as affordable housing, a favorable climate, and opportunities for outdoor recreation. The age distribution in the county is relatively balanced with a mix of younger and older residents resulting in a median age of around 47, slightly higher than the national average (Headwaters Economics (HE) 2024).

The county is a predominately white population with a significant Hispanic or Latino minority and a smaller population of American Indian, Asian, and Black residents. Most of the households in Mohave County are family households followed by non-family households and individuals living alone. Median income in the county is slightly below the national average but the range of incomes reflects the diverse socioeconomic backgrounds of the county's residents. The county's economy is driven by various sectors including industry, tourism, government, healthcare, manufacturing, mining, and agriculture (HE 2024).

Tourism plays a significant role in Mohave County's economy, with attractions mentioned in Section 4.1 above drawing visitors from around the world. The tourism industry supports businesses such as hotels, restaurants, and recreational activities contributing to job creation and revenue.

4.2.2 Visitor Characteristics

Primary visitors to the public lands administered by KFO are from the tri-state area (Arizona, California, and Nevada) including Kingman, Bullhead City, Fort Mohave, Lake Havasu City, and the outlying areas surrounding those locations as well as Needles, CA. Secondary visitors to the area are from the surrounding metropolitan areas including Las Vegas, NV; Phoenix, AZ; and the Inland Empire of California. Tertiary visitors are transitory in nature and primarily national or international visitors that are focusing their visit on primary destinations in the area such as Historic Route 66, GCW, GCNP, and Sedona. The relatively warm weather in the winter months makes this area an attractive, even primary, destination for seasonal residents, known as "snowbirds." Seasonal residents temporarily increase the population of the area and generates significant economic output for the area.

5.0 Fee Sites Overview

5.1 Description of Kingman Field Office Recreation Fee Sites

Three fee sites are located throughout the geographic area managed by the KFO. The Burro Creek Campground is located along U.S. Highway 93 (future Interstate 11 corridor)

73 miles south of Kingman, AZ in the transition zone between the Mojave and Sonoran deserts adding to the geologic uniqueness of the area. The Wild Cow Springs Campground is in the Hualapai Mountains 18 miles south of Kingman, AZ in a unique approximately 6,200 feet elevation Ponderosa Pine grove. The Windy Point Campground is located along U.S. Highway 93 (future Interstate 11 corridor) in the Cerbat Mountains 31 miles north of Kingman, AZ and situated at approximately 6,100 feet elevation in a Pinyon-juniper woodland forest.

These sites facilitate partnerships with local scout troops and provide opportunities to employ campground hosts that often reach a wide group of audiences that BLM may not otherwise reach.

5.1.1 Visitor Preferences

In 2020 and 2022, the BLM's KFO completed an outcome focused management (OFM) survey in conformance with BLM policy found in BLM Handbook 8320, Planning for Recreation and Visitor Services. The OFM survey covered the broad areas where each of the three fee sites are located within and focused on the recreating public's outcomes gained from engaging in recreational experiences on public lands (Fix, et al, 2024). Data from the OFM project is described below for each fee site and those findings are correlated to sentiment on this fee modification.

<u>Burro Creek Campground</u> – Visitors contacted at this site provided the following data:

- Visitors to this area participate in activities such as day hiking, walking, driving to sightsee, camping, OHV riding, rockhounding, photography, bird watching, and wildlife watching.
- 70% of visitors to this area are very satisfied with their visit while 5% of visitors are very dissatisfied with their visit.
- 63% of visitors wanted management left as is while 23% of visitors wanted a more hands-off management style and only 14% of visitors wanted BLM to exercise more visitor and land use controls.
- 32% of visitors chose to stay at a BLM designated campground (Burro Creek in this case).
- 47% of visitors contacted within the Burro Creek SRMA visited the Burro Creek Campground during their visit and 60% of those visitors were repeat visitors that visited the area 3.7 times in the last year.

In summary, visitors to this area participate in a wide range of activities including about a third of visitors that camp at a BLM campground, are satisfied with their visit, would prefer that management is left as is, and over half are repeat visitors with more than two visits to that area per year.

<u>Wild Cow Springs Campground</u> – Visitors contacted at this site provided the following data:

- Visitors to this area participate in activities such as day hiking, walking, driving to sightsee, camping, OHV riding, technical 4WD OHV use, bird watching, wildlife watching, and visiting historical sites (likely Gold King Mansion).
- 50% of visitors to this area are very satisfied with their visit while 42% of visitors are somewhat satisfied with their visit and another 8% of visitors are very dissatisfied with their visit.
- 60% of visitors wanted management left as is while 30% of visitors wanted a more hands-off management style and only 10% of visitors wanted BLM to exercise more visitor and land use controls.
- 25% of visitors chose to stay at a BLM designated campground (Wild Cow Springs in this case).
- 78% of visitors contacted within the Hualapai Mountain SRMA visited the Wild Cow Springs Campground during their visit and 71% of those visitors were repeat visitors that visited the area 18.5 times in the last year.

In summary, visitors to this area participate in a variety of activities including about a quarter of visitors that camp at a BLM campground, about half are satisfied with their visit, would prefer that management is left as is, and the majority of visitors are repeat visitors visiting the area 18 times per year.

Windy Point Campground – Given that this site was not specifically used in the OFM project, only generalizations from the entirety of public lands managed by the KFO could be used to assume visitor preferences at this site. 12% of visitors choose to stay at a BLM designated campground. 74% of visitors to the KFO are very satisfied with their visit while 20% are somewhat satisfied with their visit). The predominate activities that visitors participate in are day hiking, walking, driving to sightsee, camping, OHV riding, rockhounding, photography, and wildlife watching. Management control may also inform the business plan proposal where across the KFO 68% of visitors wanted management left as is while 21% of visitors wanted a more hands-off management style and only 11% of visitors wanted BLM to exercise more visitor and land use controls (Fix, et al. 2024). In summary, visitors to the area participate in a variety of activities with a small amount choosing to stay at a BLM campground, most are satisfied with their visit, and the majority of visitors wanted management left as is.

5.1.2 Burro Creek Campground

Burro Creek Campground is situated along Burro Creek within a very scenic Sonoran Desert canyon. Burro Creek, with its deep blue pools and tree-lined banks, is located within a desert setting of saguaro-studded hills and colorful cliffs. The recreation site encompasses a campground, a group campsite, a picnic area with a Watchable Wildlife Exhibit, and an interpretive Desert Garden. The



site has a long history of use involving wintertime camping and summertime swimming, and is a favorite rest stop for travelers on nearby U.S. Highway 93 (future Interstate 11 corridor). Popular activities in the area are camping, picnicking, swimming, rock collecting, birdwatching, hunting, and driving off-highway vehicles.

Burro Creek Campground offers 23 campsites for tent or recreational vehicle (RV) use (including one accessible site), with picnic tables, shade ramada, and fire ring grills. Also provided are two accessible restroom facilities with flush toilets, potable water, lighting, and environmental education bulletin boards. The Group Campsite consists of a large shade ramada, accessible tables, pedestal and campfire grills, potable water, and garbage cans. There is a RV dump station, a self-service fee station, potable water and garbage cans located within the site. A volunteer campground host is generally on duty at the site between October and April. The host is provided with a campsite supplied with electric, potable water, and sewer hookups. Visitors can explore Burro Creek via several access points from the site. The day use area offers five picnic sites, each with a shade ramada, table and pedestal grill. The Watchable Wildlife Exhibit and Desert Garden provide area native flora and fauna information to visitors.

Data discussed in this section and Section 5.1.3 and 5.1.4 below was retrieved from the BLM's Recreation Management Information System (RMIS) database. Over the last five years, Recreation Use Permits (RUPs) issued at the site have averaged 2,392 per year accounting for 82% of all RUP sales within the KFO. Visitation to the site average 4,439 visitors per year between FY14 and FY23 and increased

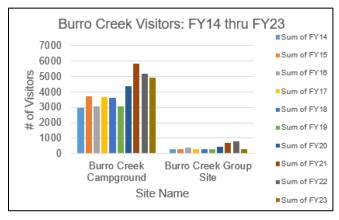


Figure 2

on average 4% with both increases and decreases over that 10-year period as illustrated in Figure 2. The Burro Creek Group Site accounted for an average of 31 RUPs issued over the last five years at the site and just over 400 visitors per year. Recreation visits to the Burro Creek SRMA account for an average of 30,946 visits over the last 10-years (RMIS 2024). These visits can impact direct use of the Burro Creek Campground.

Visitors vary depending upon the season of use, but primarily include "snowbirds" travelling to and from the southwest deserts occupying the Burro Creek Campground for one to two nights with fewer visitors staying one to two weeks. The site is also popular among families on holidays and weekends between October and April, especially since the increase in motorized recreation in Arizona over the last 15 years. During the summer months, temperatures often eclipse 100° F and is typically only popular among locals from the Wikieup and Bagdad areas that use the site predominately for day use given the access to the deep blue pools of Burro Creek that are present year-round. Further information about visitor preferences is discussed in Section 5.1.1 above.

5.1.3 Wild Cow Springs Campground

Wild Cow Springs Campground is situated in a grove of oak and mature ponderosa pines within the Hualapai Mountains. Rising high above the surrounding desert, the mountain range is a cool green island surrounded by the lower deserts. The site is especially attractive during the summer months, with temperatures here averaging 20° F cooler than the

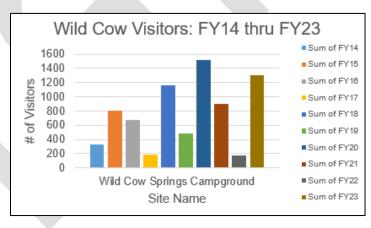


Figure 3

nearby desert valleys located 3,000-4,000 feet below. The site appeals to visitors seeking a quiet, wooded refuge and features a snow-fed seasonal stream, 16 individual camping/picnicking sites (including one accessible site), a group site, and a short hiking trail. Each site is provided with a picnic table and campfire grill. Three restroom facilities are centrally located in the campground, with nearby environmental education bulletin boards. Bear-proof garbage cans are centrally located within the recreation site. A self-service fee station is located at the entrance to the recreation site. Popular activities in the area are picnicking, camping, and driving off-highway vehicles (OHVs) for pleasure and hunting.

Over the last five years, RUPs issued at the site have averaged 309 per year accounting for 11% of all RUP sales within the KFO. Visitation to the site average 754 visitors per year between FY14 and FY23 and increased on average 8% with both increases and decreases over that 10-year period as illustrated in Figure 3. The Wild Cow Springs Group Site accounted for an average of 16 RUPs issued over the last five years at the site and just under 200 visitors per year. Recreation visits to the Hualapai Mountain SRMA account for an average of 10,600 visits over the last 10-years (RMIS 2024). These visits can impact direct use of the Burro Creek Campground.

Local residents in the 20- to 40-year-old age range comprise 95% of the visitors to the site and come from the surrounding communities as outlined in Sections 4.2.2 and 5.1.1.

Visitors coming to the site from areas outside of Mohave County make up about 5%. Day use of the site is also popular among motorized enthusiasts using adjacent public lands, particularly in the summer throughout the weekday and weekend. In 2020 and 2021, visitation to the site dropped steeply due to significant wildland fire events in the area that triggered temporary closures and post-fire flooding that precluded access to the site. Since FY20, the CRD Fuels Management



Program has put a substantial investment into hand thinning and pile burning vegetation within the confines of the campground to restore the natural fire regime and to protect against catastrophic wildfire.

5.1.4 Windy Point Campground

Windy Point Campground is situated along the crest of the Cerbat Mountains. The site is located in picturesque woodland consisting of pinyon pine and juniper with spectacular views of the surrounding valleys and distant mountain ranges. Cherum Peak Trail, a 2.5-mile trail, and Packsaddle Recreation Site are located within two miles of Windy Point Campground. The recreation site offers eight campsites (including one accessible



site), each containing picnic tables and campfire grills. Trash cans and a restroom facility are centrally located within the site. A self-service fee station is located at the entrance to the area. Popular activities in the area are picnicking, camping, motorized touring, hiking and hunting.

Over the last five years, RUPs issued at the site have averaged 161 per year accounting for 7% of all RUP sales within the KFO. Visitation to the site average 241 visitors per year

between FY14 and FY23 and increased on average 9% with both increases and decreases over that 10-year period (RMIS 2024) as illustrated in Figure 4. Visits in FY14, 16, and 19 were not fully captured creating some skew in the data presented in this paragraph.

Visitation to the site mirrors that described in Section 5.1.2 for the Wild Cow Springs Campground with only a minor deviation in local visitation versus non-local visitation. Local visitors account for 90% while non-local visitors account for 10%.

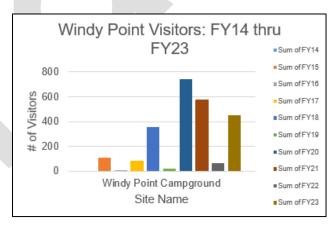


Figure 4

5.2 Determination of Recreation Site Eligibility for Fee Collection

To comply with section 6802(g)(2)(A) of FLREA, BLM must determine that recreation sites offer a majority of nine specific amenities at those sites to charge an expanded amenity fee for use of a developed campground. Table 1 provides that determination.

Table 1 - FLREA Determination

*Required Amenities per 16 U.S.C. 6802(g)(2)(A)	Burro Creek Campground	Wild Cow Springs Campground	Windy Point Campground
Tent or Trailer Spaces	Yes	Yes	Yes
Picnic Tables	Yes	Yes	Yes
Drinking Water	Yes	No	No
Access Roads	Yes	Yes	Yes
Fee Collection by Employee or Agent	Yes	Yes	Yes
Reasonable Visitor Protection	Yes	Yes	Yes
Refuse Containers	Yes	Yes	Yes
Toilet Facilities	Yes	Yes	Yes
Simple Devices for Containing Campfires	Yes	Yes	Yes

^{*}Per FLREA, part 6802(g)(2)(A) the BLM may collect an expanded amenity fee at a developed campground provided the majority of the amenities listed in the aforementioned part of FLREA are provided.

Based on the information contained in Table 1, it is determined that all three campgrounds qualify as sites that can require an expanded amenity fee for overnight use of the site.

6.0 Proposed Fee Increase

6.1 Fee Proposals

6.1.1 Fair Market Value Fee Increase

A regional survey of fees charged at adjacent sites that are comparable to the three campgrounds covered under this business plan was conducted to identify a fair market value fee increase. As a starting point, the comparable sites identified in the 2009 Kingman Amenity Fee Site Program Business Plan were used to be consistent with prior fee methodologies. Of the 22 sites used, five sites have not updated their fees since the 2009 Kingman Amenity Fee Site Program Business Plan was completed. Of those five, four sites (T.K. Jones, Oxbow, Senator Wash, Crossroads) were not carried forward as a comparable site due to fees being out of date leaving 18 total sites used for comparison. The United States Forest Service (USFS) proposed a fee increase at one comparable site (Mingus Mountain Campground) from the current \$10.00 per night to \$18.00 per night for a non-electric site and this fee increase was affirmed by the Arizona Resource Advisory Council on April 25, 2024. The greater fee was used in this analysis, although this change has not been approved and implemented by the USFS. The remaining 18 comparable sites have all undergone a fee increase since the 2009 Kingman Amenity Fee Site Program Business Plan. In addition to the 18 sites used to evaluate various fees charged at the KFO fee sites, six comparable RV dump stations were used to evaluate the fee charged at the Burro Creek Campground for use of the RV dump station absent an overnight camping permit.

Comparable sites were categorized based on their level of development and included high, medium, and low categories (see Appendix C, Tables 10, 11, and 12). Highly developed sites offered drinking water, flush toilets, paved access roads, and shade ramadas while lower developed sites offered basic amenities to include dirt access roads and vault toilets but lacked drinking water or constructed shade ramadas. The KFO fee sites were correlated to the 18 comparable sites based on amenities offered to compare fees. Burro Creek campground is in the medium category for development due to amenities like drinking water, paved and dirt access roads, flush toilets, and shade ramadas at each individual and group site. The Wild Cow Springs and Windy Point Campground were categorized as lower developed sites due to the lack of drinking water available and dirt road accesses that need maintenance as well as the lack of developed shade ramadas, instead the sites rely on shade trees. The summary of each KFO managed site is broken down in Table 2 below.

Table 2 – Fair Market Value Summary

KFO Fee Site & Amenity Codes	Comparable Sites & Development Category	Fee Range	*KFO Fee Site Increase Consideration	KFO Actual Proposed Fee
Burro Creek Campground	Hualapai Mountain (RV Camping): Medium	\$10 to \$45 per night	\$34.00 per night	\$28.00 per night
Individual Sites	Davis Camp (RV Camping): Medium			
(Medium)	Red Rocks Canyon (RV Sites): Medium			
	Lower Wolf Creek: Low			
	Mingus Mountain Campground: Medium			
	White Horse Lake Campground: Medium			
Burro Creek Campground Group Site	Hualapai Mountain (Group Camping): Medium	\$80 to \$150 per night	\$121.60 per night	\$80.00 per night
(Medium)	Davis Camp (Group Camping): Medium			
	Red Rocks Canyon (Group Site): Medium			
	Lake Mead NRA (Group Site): High			
	White Horse Lake (Group Site): Medium			
Burro Creek Campground	My Stop Convenience (Phoenix, AZ)	\$15 to \$20 per RV Dump;	\$16.25 per RV	\$15.00 per RV Dump
Dump Station (N/A)	Fort Beale RV Park (Kingman, AZ)	free with overnight		(free with overnight
	Fast Mart Chevron (Wickenburg, AZ)	camping permit		camping permit)
	Davis Camp (Bullhead City, AZ)			

KFO Fee Site & Amenity Codes	Comparable Sites & Development Category	Fee Range	*KFO Fee Site Increase Consideration	KFO Actual Proposed Fee
	Lake Havasu State Park Cattail Cove State Park (Mohave County, AZ)			
Wild Cow Springs Campground Individual Site (Low)	Hualapai Mountain (Dry Camping): Medium Davis Camp (Dry Camping): Medium Red Rocks Canyon (Walk-in Sites): Medium Lower Wolf Creek: Low	\$10 to \$30 per night	\$20.25 per night	\$20.00 per night
Wild Cow Springs Campground Group Site (Low)	Kaibab Lake (Double Site): Medium Christopher Creek Gulch (Group Site): Medium Ponderosa (Group Site): Medium Turney Gulch (Group Site): Medium	\$40 to \$100 per night	\$73.75 per night	\$30.00 per night
Windy Point Campground Individual Site (Low)	Hualapai Mountain (Dry Camping): Medium Davis Camp (Dry Camping): Medium Red Rocks Canyon (Walk-in Sites): Medium Lower Wolf Creek: Low	\$10 to \$30 per night	\$20.25 per night	\$20.00 per night

^{*}Based on average cost of all comparable site fees.

As shown in Table 2 above, the comparable sites used to evaluate the KFO fee sites were within the same development category used in most cases. As noted in Appendix C, Table 11, there are some outliers to the data set, two being the Burro Creek and Wild Cow Springs Campgrounds group sites which both came in higher than the full cost recovery fee calculation noted in Section 6.1.2. The fair market value analysis for KFO's three fee sites has been summarized by campground below:

Burro Creek Campground – This site's amenities such as drinking water, paved and dirt access roads, flush toilets, and individual shade ramadas throughout the site helped it to rank higher than seemingly more developed sites. Clear shortcomings of the Burro Creek Campground were lack of maintenance or use of aggregate along access roads and site driveways as well as a need for Architectural Barriers Act-compliant infrastructure at the group site and surrounding the lower restroom facility. These shortcomings would be remediated should fees increase and would be prioritized for future expenditures as outlined in Section 8.0.

Wild Cow Springs and Windy Point Campground - These site's lack of amenities such as water (potable and non-potable), paved access roads, and lack of developed shade ramadas put these sites in a lower amenity code ranking. Development of a water source for the Wild Cow Springs Campground was previously investigated to which it proved infeasible making it highly unlikely water would ever be developed. Water resources at the Windy Point Campground have not been investigated but the visitor preferences outlined in Section 5.1.1 do not necessarily support such a development as most visitors prefer BLM to leave management as is. Maintenance and improvement of access roads and site driveways however would enhance the desirability of the facility based on informal communications at these sites with the recreating public. This work would be prioritized should fees increase and will be outlined in Section 8.0.

6.1.2 Full Cost Recovery Fee Increase

A full cost recovery fee increase was calculated for purposes of this analysis in which the KFO reviewed total operating costs between Fiscal Year (FY) 2019 and FY 2023. This fee increase proposal includes dollars spent from local recreation fee collection (RFC) accounts and Management of Lands and Resources (MLR) allocations sent to the BLM by congress. Total operating costs included both operational expenses and labor in categories such as management of fee collection, annual and deferred site maintenance, campground host program management, outreach and education materials, road and trail maintenance, and site management contracts.

Total RFC revenue generated at the three fee sites from FY 2019 through FY 2023 was \$199,293.60, an average of \$39,858.72 per year. Total operational expenses (e.g.,

supplies, contracts, and 40-year deferred maintenance (DM) costs) out of RFC and MLR accounts from FY 2019 through FY 2023 accounted for \$364,828.03, an average of \$72,965.61 per year. To account for 40-year DM costs, \$22,955.19 per year was added on to operational expenses to capture future major maintenance needs. Annual DM costs were calculated by using the total known DM costs outlined in Section 7.1 below. Total labor expenses out of RFC and MLR accounts from FY 2019 through FY 2023 accounted for \$404,914.13, an average of \$80,982.83 per year. Table 3 outlines the total financial gap between RFC revenue and operations expenditures. This financial gap averaged \$114,082.85 per year from FY 2019 through FY 2023.

Table 3 - RFC Revenues and Funding Deficiency

Fiscal Year	RFC Revenue	RFC *Operations Expenses	MLR *Operations Expenses	Total *Operations Expenses	**Total Funding Deficiency
2019	\$31,122.50	\$41,382.12	\$92,748.75	\$157,086.06	-\$125,963.56
2020	\$35,204.69	\$28,875.43	\$97,880.83	\$149,711.45	-\$114,506.76
2021	\$42,238.71	\$31,999.37	\$108,630.32	\$163,584.88	-\$121,346.17
2022	\$50,976.17	\$13,551.97	\$77,241.59	\$113,748.75	-\$62,772.58
2023	\$39,651.53	\$60,668.31	\$101,763.19	\$185,386.69	-\$145,825.16
Averages	\$39,858.72	\$35,295.44	\$95,652.94	\$153,903.57	-\$114,082.85

^{*}Operations includes supplies, contracts, labor, and 40-year deferred maintenance (DM) costs at \$22,955.19 per year.

These costs are broken down by fund account in Section 7.1 and split out by labor and operations. The costs expended are also generally categorized into such things as maintenance and contracts.

New proposed site fees based on full cost recovery would serve to bridge the average \$114,082.85 per year gap. To determine what the full cost recovery fee would be for each site fee that is charged, the KFO queried information from a variety of databases to include RMIS, BLM's Financial and Business Management System (FBMS), and the BLM's Collections and Billings System (CBS). Data from each database was queried from FY 2019 through FY 2023.

^{**}Total RFC revenue generated less operational expenses.

RMIS was used to determine how many RUPs were issued for each fee collected in the KFO. Once the number of RUPs issued at each fee site was determined, a percentage was assigned based on dividing the number of RUPs issued at each site by the total issued per year by FY. From these percentages, an average percentage for each type of RUP as shown in Table 4 was assigned. FBMS was used to query total RFC revenue generated at each site from FY 2019 through FY 2023 while CBS was used to substantiate the RMIS and FBMS data, to which limited inconsistencies were found.

The average \$114,082.85 revenue gap was then multiplied by each type of RUP to determine the dollar value each RUP represented as it pertained to the revenue gap. Once the dollar amount was determined by RUP, then the average RUPs issued by type was divided by the average total RUPs issued between FY 2019 and FY 2023. This number represents the additional dollar amount that would need to be added to the current fee to obtain full cost recovery through sale of RUPs eliminating the need to supplement operations at the site with MLR allocations from congress. The full fee that would meet the KFO's cost recovery need is outlined below in Table 4.

Table 4 - Full Cost Recovery Fee

RUP Type	Average % RUP Issued (FY19 – FY20)	Representative \$114,082.85 GAP Amount	Average # of RUPs Issued Annually	*Additional Fee Amt. Needed for Full Cost Recovery	Total Proposed Cost Recovery Fee
Burro Creek Individual Site	81.8%	\$93,366.62	2,393	\$39.00	\$53.00 per night
Burro Creek Group Site	1.1%	\$1,284.17	31	\$42.00	\$92.00 per night
Burro Creek Dump Station	0.9%	\$1,017.87	26	\$39.00	\$49.00 per RV
Wild Cow Springs Individual Site	10.5%	\$11,925.46	350	\$34.00	\$42.00 per night
Wild Cow Springs Group Site	0.5%	\$624.17	16	\$38.00	\$58.00 per night

RUP Type	Average % RUP Issued (FY19 - FY20)	Representative \$114,082.85 GAP Amount	Average # of RUPs Issued Annually	*Additional Fee Amt. Needed for Full Cost Recovery	Total Proposed Cost Recovery Fee
Windy Point Individual Site	5.1%	\$5,864.56	244	\$24.00	\$32.00 per night

^{*}Numbers rounded to propose a fee that represents a whole number.

A fee increase based on full cost recovery is outlined in this plan as a fee alternative to avoid basing fee increases solely on comparable sites in the area if comparable sites generate a proposed fee increase that is higher than what actual revenue and expenditures show about a given RFC account. Section 6.2 below shows the proposed fee increase for each type of RUP sold in the KFO and will also summarize the differences in fee proposals.

6.2 Fee Comparison

Sections 6.1.1 and 6.1.2 discuss variable methods for calculating and demonstrating KFO's need to propose a fee increase. As shown in Table 5, there is a certain degree of variance between the fair market value and full cost recovery fee determinations. Of the six amounts of fees charged by the KFO, only two fee amounts increase more under the fair market analysis than the full cost recovery fee calculation. On average, overnight camping for individual sites under the fair market analysis fee determination would increase \$14.83 while the RV dump station fee at the Burro Creek Campground would increase \$6.25. While the fair market analysis was used to set fee increases at Wild Cow Springs and Windy Point Campgrounds, the average individual site increase was used to set the fee increase at Burro Creek Campground. The group site fees for the Burro Creek and Wild Cow Springs Campgrounds produce more of a fee increase than the full cost recovery fee determination and so a mix of both fee calculation methodologies may be needed to produce a reasonable proposal.

As documented in Appendix C, Table 11 the Wild Cow Springs Campground group site proved difficult to have a comparable site that matched the amenities. The Kaibab Lake Campground (Double Site), although not a group site was the closest site found within this regional area that compared well to the Wild Cow Springs Campground group site. This site charged a fee of \$40.00 per night, a variance of \$20.00 from what is currently

charged at Wild Cow Springs Campground for the group site. It is more appropriate to view the Wild Cow Springs Campground group site like the increase for an individual site based on the fair market value fee determination. Sites used in the fair market value fee determination for the Burro Creek Campground group site were more highly developed and accommodating of larger groups having significantly higher fees while others were more like the amenities available at the Burro Creek group site. A fee increase for the Burro Creek group site should compare the reasonableness of full cost recovery against sites used in the fair market value analysis that showed nearly the same nightly rates as outlined in Appendix C, Table 12. These sites were specifically Red Rock Canyon and Lake Mead National Recreation Area Boulder Beach Group Sites, each of which charged a fee of \$80.00 per night.

Table 5 - Fair Market Value and Full Cost Recovery Fee Increase Comparison

Fee Site	Existing Fee	Fair Market Value Fee Determination	Full Cost Recovery Fee Determination	Total Fair Market Value Increase	Total Full Cost Recovery Increase
Burro Creek Campground Individual Site	\$14.00 per night	\$34.00 per night	\$53.00 per night	\$20.00	\$39.00
Burro Creek Campground Group Site	\$50.00 per night	\$121.60 per night	\$92.00 per night	\$71.60	\$42.00
Burro Creek Campground RV Dump Station	\$10 per RV (Free with Camping Permit)	\$16.25 per night	\$49.00 per RV	\$6.25	\$39.00
Wild Cow Springs Campground Individual Site	\$8.00 per night	\$20.25 per night	\$42.00 per night	\$12.25	\$34.00
Wild Cow Springs Campground Group Site	\$20.00 per night	\$73.75 per night	\$58.00 per night	\$53.75	\$38.00

Fee Site	Existing Fee	Fair Market Value Fee Determination	Full Cost Recovery Fee Determination	Total Fair Market Value Increase	Total Full Cost Recovery Increase
Windy Point Campground Individual Site	\$8.00 per night	\$20.25 per night	\$32.00 per night	\$12.25	\$24.00

6.3 Proposed Fee Increase

As outlined in Sections 6.1.1, 6.1.2, and 6.2 above, the proposed fee increases for RUPs sold at the Burro Creek Campground, Wild Cow Springs Campground, and Windy Point Campground will rely predominately on fair market value calculations and be informed by full cost recovery calculations and supporting documentation for both financial analyses. The proposed fee increases for each of the RUPs sold in the KFO are outlined below:

- The Burro Creek Campground individual site would increase from \$14.00 to \$28.00 per night upon approval of this business plan.
- The Burro Creek Campground group site would increase from \$50.00 to \$80.00
 per night upon approval of this business plan.
- The Burro Creek Campground RV dump station fee would increase from \$10.00 to \$15.00 per RV upon approval of this business plan. Use of the RV dump station at Burro Creek would still be free with purchase of an overnight camping RUP.
- The Wild Cow Springs Campground individual site would increase from **\$8.00 to \$20.00 per night** upon approval of this business plan.
- The Wild Cow Springs Campground group site would increase from **\$20.00 to \$30.00 per night** upon approval of this business plan.
- The Windy Point Campground individual site would increase from **\$8.00 to \$20.00** per night upon approval of this business plan.

For individual campsites managed under this plan, half off camping would still apply for holders of the following Interagency passes subject to legislative changes that may preclude a discount on expanded amenity fees in the future:

- Senior Annual and Lifetime Passes
- Access Pass

6.4 Future Fee Increases

BLM's permit and fee policy recommends the use of an index for routine fee adjustments rather than reviewing each individual adjustment through a comprehensive business plan effort that requires a tremendous investment of effort and time. The Kingman Field Office Amenity Fee Sites permit fees have been at their current levels since 2009. According to the U.S. Bureau of Labor Statistics (BLS) in 2009 the average annual Consumer Price Index for All Urban Consumers (CPI-U) was at 214.537; by 2023 it had climbed to 304.702, an increase of 42%.

The KFO seeks approval to adopt a model to increase fees by 20% whenever the CPI-U, US City Average, All Items, 1982-84=100, not seasonally adjusted, rises by 20% for the annual average (January to December). According to the BLS, the Consumer Price Index or CPI is "a measure of the average change over time in the price paid by urban consumers for a market basket of consumer goods and services" (bls.gov/cpi). The CPI-U is the broadest and most comprehensive CPI. The all urban consumer group included in the CPI-U represents over 90 percent of the total U.S. population (https://www.bls.gov/cpi/guestions-and-answers.htm).

The BLM is seeking approval to exercise the option to increase each fee by 20%, rounded up to the nearest whole dollar, when there is a 20% increase in the CPI-U from the date this business plan is approved. If the 20% increase occurs sooner than four years from the approval date of the business plan, then the KFO would not exercise the increase until after the four-year waiting period. Thereafter, the 20% increase could not occur more frequently than a four-year interval. The first adjustment would result in an increase to: the Burro Creek individual site fee of \$6 or \$34 per night, the Burro Creek group site fee of \$16 or \$96 per night, the Burro Creek RV Dump fee of \$3 or \$18 per RV (if not camping), the Wild Cow Springs individual site fee of \$4 or \$24 per night, the Wild Cow Springs group site fee of \$6 or \$36 per night, and the Windy Point individual fee of \$4.

This model would ensure the Kingman Field Office Amenity Fee Sites fees evolve in tandem with the ever-changing environment of the future and increasing costs. The KFO would continue to evaluate future fee increases to ensure that fees charged are reasonable and appropriate to continue providing equitable experiences.

6.5 Consequences of Changing and Not-Changing Fee Rates

The proposed fee increase outlined in Section 6.3 and the methodology to determine the proposed fee increase discussed in Sections 6.1.1, 6.1.2, and 6.2 only demonstrate the financial or quantitative need to increase fees in the KFO. This section discusses the

qualitative issues around changing or not changing the fees in terms of site management, visitor experience, impacts to local economies, environmental stewardship, and socio-economic impacts to a litany of groups. Impacts from both fee calculation methodologies will be discussed since both fair market value and full cost recovery fee calculation determinations were used to propose fee increases.

6.5.1 Site Management Impacts

Per Section 5.1.1 above, on average 64% of visitors (Fix, et al. 2024) determined as part of KFO's OFM survey that they would like management of recreational resources on public lands left as is. Since fees were set in 2009, inflation coupled with reductions in staffing and budget cuts have left the KFO managing its three fee sites on a tight budget and with limited staff to complete annual maintenance. This has led to diminished desired experiences and recreational outcomes at the sites due to unmaintained assets such as restrooms, access and site roads, site driveways, and interpretive panels. A prolonged lack of annual maintenance has led to intermittent facility closures due to aging infrastructure, intermittent issues from overflowing trash cans, uncleaned restrooms, and in general sites that sometimes do not meet the expectations of what visitors had come to expect. Increasing the fee through a combination of fair market value and full cost recovery analysis will help the KFO to fund the repair of assets and staff the field office accordingly to properly manage the sites. If fees are not raised, it is anticipated that facilities will fall further into deferred maintenance status thereby increasing future expenses to complete corrective action. If additional staff cannot be funded then issues like overflowing trash cans, unkept restrooms, and general site degradation will be more prevalent as time goes on.

6.5.2 Visitor Experience Impacts

Visitor experience and associated outcomes is directly tied to BLM's level of management when considering the recreating public's use of a facility such as a campground. Visitor experience is often subjective and can be fluid over time but in general most sentiment towards the perceived visitor outcome from using a developed recreation site is tied directly to the management of the site. Visitor experience relates directly to identified impacts outlined in Section 6.4.1 and can be either positive as a result of continued management of a facility or negative if management changes or is diminished over time. Keeping fees static would inevitably continue to diminish visitor experience through reactive management approaches due to annual and deferred maintenance backlogs from lack of funding and staff. Fee increases have been proposed by attempting to identify the need (e.g., full cost recovery) compared to value (e.g., fair

market value) for use of similar facilities. Proposed fee increases serve to be an equitable adjustment to ensure that KFO can manage the sites under its purview to be both proactive in that management and to maintain existing visitor experiences and associated outcomes.

6.5.3 Local Economic Impact

As outlined in Section 4.2.1, the area that encompasses these fee sites relies heavily on tourism to sustain and stimulate the local economy. The surrounding public lands substantially contributes to tourist interest in this area with many attractions identified in Section 4.1 bringing local, regional, national, and international travelers to the area. These travelers and their preferences to stay at a BLM managed campgrounds as outlined in Section 5.1.1 can loosely be correlated to impacts on local economies from proposed fee increases. 32% of visitors to the Burro Creek area chose to stay at a BLM campground while 25% of visitors to the Hualapai Mountains made the same choice and only 12% of visitors to the KFO in general elected to stay at a BLM campground (Fix et al. 2024). This statistic could generally correlate to the current value of staying at a BLM managed campground versus staying in a populated area at a hotel or motel and spending money in that community.

Visitor preference to stay at a BLM campground could stay static or increase if BLM were to leave fees at current levels which could decrease tourists electing to stay in communities as BLM could "price out" the competition by undercutting other overnight service providers. Conversely, proposing to raise fees would either keep the statistic static or decrease the percentage of the population that elects to stay at a BLM managed campground thereby increasing use at other overnight service providers. In general, if BLM left fees the same this could decrease money spent in a community but if BLM increased fees, as proposed, could either not effect money spent in a community or increase economic output from tourism. It should also be noted that visitor preference largely influences money spent or not spent in a community as some visitors may simply enjoy camping on public lands rather than staying within a community.

6.5.4 Environmental Impacts

Environmental impacts resulting from changing or not changing the fees would largely be tied to impacts identified in Section 6.4.1 related to site management. Degradation of site assets could lead to excessive soil erosion, visitor use left unmanaged, environmental contamination, flora and fauna impacts, and impacts to cultural resources. Site management to include having appropriate management controls (e.g., functioning restrooms, regularly emptied refuse containers, etc.) and staffing directly correlates to the total amount of environmental degradation that occurs as a result of public use.

Environmental issues will continue to increase if fees are left at current levels as site management declines and conversely environmental issues should decrease if fees are increased as site management becomes proactive and staffing levels are commensurate to public use.

6.4.5 Socio-Economic Impacts

To determine impacts to affected low-income or minority populations, the KFO utilized the BLM Arizona State Office's Socioeconomic Decision Tool to look at ethnicity and low income for census tracks adjacent to KFO managed fee sites. Data was pulled from the Wikieup Census Designated Places (CDP), Bagdad CDP, Kingman City CDP, Dolan Springs CDP, Golden Valley CDP, and Bullhead City CDP and compared against Mohave County and Arizona to determine which populations could potentially be impacted because of fee increases. Figure 5 shows the median household income for the CDPs with the reference areas of Mohave County and Arizona being at \$53,592 and \$72,581 respectively (BLS, 2023). The CDPs that fall below the reference areas from household income are Dolan Springs, Golden Valley, and Bullhead City while Wikieup, Bagdad, and Kingman are above average for the general area. The CDPs that have lower household incomes than the reference areas. could be impacted more from fee increases particularly when considering increases at the Wild Cow Springs or Windy Point Campgrounds based on the demographic of the visitors identified in Section 5.0. Figure 6 shows the minority populations for the CDPs with the reference areas of Mohave County and Arizona being 24.5% and 47% respectively (USCB, 2023a & b). The Bagdad CDP falls well above the reference area minority population which indicates that fees being raised at Burro Creek

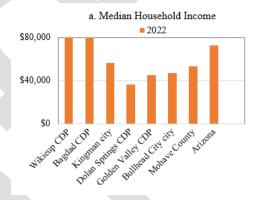


Figure 5

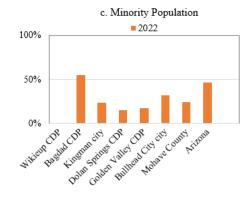
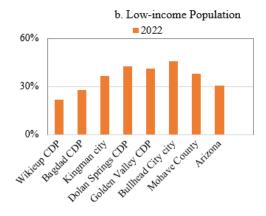


Figure 6



Campground could potentially impact minority populations but would seem to not have an impact if considering median household income as the Bagdad CDP falls above the reference communities. Figure 7 shows low-income populations for the CDPs with the reference areas of Mohave County and Arizona being 37.8% and 30.8% respectively. The CDPs that fall above the reference areas are Dolan Springs (42.7%), Golden Valley (41.3%), and Bullhead City (45.8%) and therefore these communities could be most affected by proposed fee increases at the Wild Cow Springs and Windy Point Campgrounds based on the visitor demographics provided in Section 5.0.

Environmental Justice (EJ) populations occur within the Bagdad, Dolan Springs, and Bullhead CDPs. The Bagdad area falls into the EJ community criterion 1 (minority population higher than 50%) and criterion 2 (minority population higher than 110% of reference area). As discussed earlier, although the Bagdad population has a higher minority population, the average household income is well above the reference areas of Mohave County and Arizona. The Dolan Springs area falls into the EJ community criterion 4 (low-income population higher than 100% of reference area) which is substantiated by the high low-income percentage (42.7%) associated with that CDP. The Bullhead City area falls into EJ community criterion 2 (minority population higher than 110% of reference area) and 4 (low-income population higher than 100% of reference area) which is also substantiated by high minority population (32.1%) and high low-income percentage (45.8%) when compared to reference areas. Individuals from the communities of Dolan Springs and Bullhead City would have the highest potential for impact from proposed fee increases from a socioeconomic perspective and considering EJ criterion.

These individuals, while part of a known EJ class when compared to the reference areas of Mohave County and Arizona are not geographically distant from public lands which indicates they have a higher potential to use their public lands than EJ populations further away from public lands. The KFO is proposing the most equitable possible fee increase considering that the business analysis conducted in Sections 6.1, 6.2, and 6.3 approached the fee increases from a mixed fair market value and full cost recovery approach to propose a reasonable increase. This increase is meant to be centric in that it will provide the KFO enough to proactively manage the resource while not pricing out EJ populations, specifically low-income individuals, and minority populations. From a socioeconomic standpoint, beneficial outcomes may include the BLM providing added value to low-income or minority populations by providing a more desirable opportunity for a better value than these populations could obtain elsewhere. Utilizing fees as outlined in Section 8.0 may also aid in providing enhanced educational opportunities for EJ populations that would not otherwise have exposure to such opportunities as fee increases will help the KFO focus on educational outreach at fee sites. Overall, fee increases may impact EJ populations in the Dolan Springs and Bullhead City areas the

most, but efforts made in the business analysis to make an equitable adjustment to fees should not preclude future use of these sites.

6.6 Use of E-commerce at Kingman Field Office Fee Sites

The KFO will use various e-commerce technologies, as directed in BLM Instruction Memorandum 2022-010, to provide recreation visitors the opportunities to find, reserve, and pay for a campsite within the field office. Most of these options are provided through the interagency reservation service Recreation.gov.

Currently, an expanded amenity fee for reservation services is charged at Burro Creek Campground. If the KFO decides to make reservation services or other types of ecommerce options available in the future, a reservation service fee would be charged in addition to any other standard or expanded amenity fees in accordance with 16 U.S.C. 6802(g)(2)(G).

Reservation service fees could range from \$0.50 to \$10.00 depending on the type of service provided. The reservation service fee is subject to contracting requirements and will be adjusted with contract changes or with future updates to the business plan. For visitors who wish not to pay the expanded amenity fee of reservation services, the field office will attempt to continue to provide a blend of reservation and first come-first served options until or unless the office moves the fee site/area entirely to e-commerce. Other payment options may also be considered in the future as technology and software develops, such as onsite credit card payment systems or scan and pay.

7.0 Revenue and Operating Costs

7.1 Summary of Operating Costs – FY19 thru FY23

Operations and labor costs between FY 2019 and FY 2023 totaled \$654.966.21 out of both RFC and MLR accounts for an average annual operations and labor cost of \$130,993.24 per year. Between FY 2019 and FY 2022, the Burro Creek Campground underwent major deferred maintenance (DM) projects to renovate the two restroom facilities, waterlines, sewer lines, and potable water storage tank serving the site. Labor charges associated with these DM projects totaled \$21,682.61 for project oversight. Design and construction costs for these projects totaled \$896,525.06 over that four-year period. Although these projects are atypical to the site, replacing and updating infrastructure that has been at the site since the early 1980s is critical to the ongoing operation and should be accounted for as an expense. Since most of the major infrastructure across all three campgrounds has an approximately 40-year lifecycle,

added annual operational expenses would total \$22,955.19 per year to account for future renovation or replacement costs.

Table 6 shows total labor and operations expenditure to include RFC dollars (L1232) and MLR dollars (L1220 and L1660) between FY 2019 and FY 2023. Operations and labor costs shown in Table 6 accounted for building and non-building supplies, campground host reimbursements, contracts, outreach and education materials, annual trail maintenance, and annual road maintenance.

Table 6 – Summary of Operations and Labor Costs by Account FY19 to FY23

Fiscal Year	RFC or MLR Account	*Operations	Labor	Total
2019	L1220	\$5,597.23	\$29,022.65	\$34,619.88
2019	L1232	\$21,626.86	\$19,755.26	\$41,382.12
2019	L1660	\$18,762.54	\$39,366.33	\$58,128.87
2020	L1220	\$816.54	\$41,536.73	\$42,353.27
2020	L1232	\$20,718.46	\$8,381.30	\$29,099.76
2020	L1660	\$18,585.66	\$36,941.90	\$55,527.56
2021	L1220	\$20,580.47	\$30,249.63	\$50,830.10
2021	L1232	\$21,732.56	\$10,266.81	\$31,999.37
2021	L1660	\$18,795.00	\$39,005.22	\$57,800.22
2022	L1220	\$7,911.59	\$7,406.49	\$15,318.08
2022	L1232	\$13,551.97	N/A	\$13,551.97
2022	L1660	\$20,814.12	\$41,109.39	\$61,923.51
2023	L1220	\$20,114.10	\$54,185.27	\$74,299.37
2023	L1232	\$41,256.88	\$19,411.43	\$60,668.31
2023	L1660	\$-811.90	\$28,275.72	\$27,463.82

^{*}Does not include annual DM 40-year expected costs.

7.2 Summary of Known and Anticipated RFC Revenues

As shown in Table 7, RFC revenues generated at the three fee sites in the KFO have averaged \$39,858.72 between FY19 and FY23 and on average increased 8% in those five years, with a 22% decrease from FY22 to FY23.

Table 7 - RFC Revenue FY19 to FY23

Fiscal Year (FY)	RFC Revenue
FY19	\$31,122.50
FY20	\$35,304.69
FY21	\$42,238.71
FY22	\$50,976.17
FY23	\$39,651.53
Total Revenue Over Last Five Years	\$199,293.60
Average Revenues	\$39,858.72
Average % Increase	8%

As shown in Table 8, RFC revenues are anticipated to grow to \$120,796.11 per year by FY29 if the proposed fee increase is implemented in FY25. Anticipated revenue was calculated by using the average annual RUP sold for each type of permit KFO sells and adding 8% based on previous revenue increases shown in Table 7 above. If the proposed fee schedule is implemented as outlined in Sections 6.1, 6.2, and 6.3 and visitation continues to increase at the historical pattern the KFO will increase revenue over a five-year period beginning in FY 2025 and ending in FY 2029 by \$321,594.53. Section 6.4 addresses future fee increases and the methodology for how those would occur. These future increases are not captured in Table 8.

Table 8 - Anticipated RFC Revenue FY25 to FY29

Fiscal Year (FY)	Projected RFC Revenue
FY25	\$82,211.80
FY26	\$95,891.84
FY27	\$103,563.20
FY28	\$111,848.20
FY29	\$120,796.11

Fiscal Year (FY)	Projected RFC Revenue
Total Revenue Five Year Period (FY25 to	\$520,888.13
FY29)	
Total % Increase FY25 to FY29	47%

7.3 Anticipated Deferred Maintenance (DM) Projects

As outlined in Section 7.1 above, a total of \$896,525.06 was expended on DM project from FY 2019 to FY 2022 that served to renovate many of the facilities at the Burro Creek Campground. It is anticipated going forward that DM projects would still occur, particularly at the Burro Creek Campground and to a lesser extent at the Wild Cow Springs and Windy Point Campground, although projects would be submitted for all three site as needed. Anticipated projects are summarized below:

- The Federal Highway Administration (FHWA) is currently working with BLM to renovate the 1.3-mile paved access road leading to Burro Creek Campground from U.S. Highway 93. This project would include bank stabilization, ditch renovation, and roadway resurfacing and is currently anticipated to cost a little over \$2.5 million.
- The upper potable water well at Burro Creek Campground currently only produces 3.5 gallons per minute (GPM). A DM project is anticipated to be submitted to deepen the well to produce a higher GPM, although studies to determine the efficacy of this are still in progress. It is estimated this project would cost \$80,000 to complete.

8.0 Priorities for Future Expenditures

The expenditures of fees collected in the KFO under the direction of this business plan would be based on customer expectations. Visitors to our fee sites expect and have commented on a desire for the following annual and recurring needs:

- Clean, well-maintained restrooms stocked with toilet paper
- Clean campsites
- Designated and functioning fire rings
- Clean and operational picnic tables
- Shelter from sun and rain
- Level pads for tents and/or parking RVs (maintenance of driveways)
- Trash collection
- Universally accessible facilities compliant with the Architectural Barriers Act (ABA) and subsequent American with Disabilities Act (ADA)

- Interpretive and educational information and pamphlets
- Maintained access roads
- A sense of security
- Reservation services

There is a long-term need to address the following broad categories that were identified through evaluation of comparable sites and reviewing data from KFO's OFM survey project (Fix, et al. 2024).

- Improvement and regular annual maintenance of access roads, site roads, and driveways.
- Increased ABA access through construction of sidewalks, retrofitting facilities, and development of new facilities.
- Increased interpretive signage and development of educational brochures that could be distributed at the fee sites.
- Construction of additional shelter facilities at the Wild Cow Springs and Windy Point Campgrounds.

It is also anticipated that through the public comment period associated with this proposed fee modification that other recommendations for fee expenditures may be suggested and incorporated into this proposal to fulfill the public need. It is also anticipated that the KFO will need approximately \$74,000 per year in appropriated funding to contribute towards priority expenditures for both labor and operations. Based on historical project funding, the KFO will strive to maintain a positive fund balance in the RFC account of approximately \$20,000 to \$30,000 per year to provide the flexibility to address any unanticipated costs with ongoing maintenance, potential service outages, or threats to public health, property, or facilities. These funds would also be used to complete enhancements at the sites. Although not comprehensive, Table 9 provides a list of anticipated projects and associated cost estimates and time frames for completion.

Table 9 - Anticipated RFC Projects with Costs and Timeframes

Project Name	Anticipated Cost	Estimated Completion Year
Burro Creek Desert Garden Signage Project	\$5,500.00	FY 2025
Burro Creek Site Driveway Aggregate Project	\$60,000.00	FY 2026
Burro Creek Group Site ABA Project	\$35,000.00	FY 2027
Wild Cow Springs Group Site Renovations	\$25,000.00	FY 2026

Project Name	Anticipated Cost	Estimated Completion Year
Wild Cow Springs Driveway Aggregate Project	\$40,000.00	FY 2028
Wild Cow Springs Interpretive Panel Project	\$15,000.00	FY 2025
Windy Point Driveway Aggregate Project	\$40,000.00	FY 2029
Windy Point Shade Ramada Project	\$30,000.00	FY 2026

9.0 Public Outreach

9.1 Outreach Methodology

The KFO intends to broadcast the availability of this proposed fee increase widely to the public through a variety of means pursuant to part 6803 of FLREA. The following outreach methods are intended to reach the largest number of interested members of the public and users of the fee sites as possible:

- Publish a news release and distribute to local media outlets (e.g., newspapers, radio stations, news stations, etc.).
- Post the notification of the opportunity for public comment to the BLM's social media page.
- Post public notifications at all three fee sites between May and June of 2024 to capture Burro Creek Campground users and high-elevation Wild Cow Springs and Windy Point Campground users.
- Post public notifications on BLM's recreation.gov website for the Burro Creek Campground and blm.gov visit page for the Wild Cow Springs and Windy Point Campgrounds.
- Distribute the news release to partner organizations (clubs, non-governmental organizations, municipalities, etc.).
- Post draft copies of the business plan and news release in the KFO public room to reach a broader audience.
- Utilize recreation.gov to run a reservation detail report from October 01, 2021, through March 10, 2024, to mass email individuals who had reserved the Burro Creek Campground during that period totaling 859 individuals.
- Participate in any requested interviews in cooperation with the BLM Colorado River District's Public Affairs Officer.

Once the public comment period is completed and any changes are made to the fee proposal as a result of analysis of the public participation, the KFO will present the

business plan proposal to the Arizona Recreation Resource Advisory Committee (RRAC) in 2024.

10.0 References

- Bureau of Land Management (BLM). 1976. The Federal Land Policy and Management Act (FLPMA) of 1976 as Amended in October 2021.
- Bureau of Land Management. 2023. The Bureau of Land Management's Blueprint for 21st Century Outdoor Recreation. U.S. Department of the Interior, Bureau of Land Management, Division of Recreation and Visitor Services, Washington, DC.
- Bureau of Land Management. 2014. Handbook 2930-1. BLM Recreation Permit and Fee Administration Handbook.
- Bureau of Land Management. Recreation Management Information System (RMIS) 2024. 2014 to 2023 Recreation Visits; generated by Matthew Driscoll; using RMIS.
- Casey, T. T., Virden, R., Diamond, D., Garcia, R. A., & Fix, P.J. (2021). BLM Kingman Field Office Outcomes-Focused Management (OFM) Recreation Focus Group Study, 2021. Project report for the BLM Kingman, AZ Field Office. BLM PLRRP Report #13. Grand Junction, Colorado: Colorado Mesa University, Natural Resource Center, Department of Social and Behavioral Science.
- Headwaters Economics. Bureau of Land Management Socioeconomic Profile Tool. 2024.

 Bureau of Land Management (BLM) Socioeconomic Profile; generated by Matthew Driscoll; using headwaterseconomics.org/tools/blm-profiles/ (14 February 2024)
- Fix, P. J., Garcia, R. A., Virden, R. J., Divine, A. & Casey, T. T. (2024). Kingman Field Office Outcomes-Focused Management (OFM) Recreation Study, Spring 2020 and 2022. Project report for the BLM Kingman Field Office. BLM PLRRP Report #21. Fairbanks, Alaska: University of Alaska Fairbanks, Institute of Agriculture, Natural Resources and Extension.
- Federal Lands Recreation Enhancement Act of 2004, Pub. L. No. 108-447, div. J, title VIII, §801(a), Dec. 8, 2004, 118 Stat. 3377.
- U.S. Bureau of Labor Statistics (BLS), 2023, Consumer Price Index Retroactive Series (R-CPI-U-RS), U.S. City Average, All Items, https://www.bls.gov/cpi/research-series/r-cpi-u-rs-home.htm

- U.S. Census Bureau (USCB), 2023a, 2018-2022 American Community Survey 5-Year Estimates and 2012-2016 American Community Survey 5-Year Estimates, https://data.census.gov/cedsci/table
- U.S. Census Bureau (USCB), 2023b, Cartographic Boundary Files, Year of 2022, Scale of 1: 500,000 https://www.census.gov/geographies/mapping-files/time-series/geo/carto-graphic-boundary.html
- U.S. Census Bureau; PEPPOP2019.PEPANNRES-Data_Arizo; generated by Matthew Driscoll; using data.census.gov; https://data.census.gov/table?g=040XX00US04&y=2021&d=PEP%20Population%20Estimates> (13 February 2024a)
- U.S. Census Bureau; PEPPOP2019.PEPANNRES-Data_Mohav; generated by Matthew Driscoll; using data.census/gov; https://data.census.gov/table?g=040XX00US04&y=2021&d=PEP%20Population%20Estimates (13 February 2024b).

Appendix A - List of Figures

- Figure 1 Overview of the Kingman Field Office Fee Sites
- Figure 2 Burro Creek Visitors: FY 14 thru FY23
- Figure 3 Wild Cow Visitors: FY14 thru FY23
- Figure 4 Windy Point Visitors: FY14 thru FY23
- Figure 5 Median Household Income
- Figure 6 Minority Populations
- Figure 7 Low-income Populations

Appendix B - List of Tables

- Table 1 FLREA Determination
- Table 2 Fair Market Value Summary
- Table 3 RFC Revenues and Funding Deficiency
- Table 4 Full Cost Recovery Fee
- Table 5 Fair Market Value and Full Cost Recovery Fee Increase Comparison

Table 6 – Summary of Operations and Labor Costs by Account FY19 to FY23

Table 7 - RFC Revenue FY19 to FY23

Table 8 – Anticipated RFC Revenue FY25 to FY29

Table 9 – Anticipated RFC Projects with Costs and Timeframes

Table 10 – Amenity Categories (Appendix C)

Table 11 – Kingman Field Office Fee Site Fair Market Value Comparison with Amenity Description (Appendix C)

Table 12 - Fair Market Value Comparable Site Descriptions and Evaluation (Appendix C)

Appendix C - Tables

Table 10 - Amenity Categories

Amenity	Tent/Trailer Spaces	Picnic Tables	Drinking Water	Access Roads (Paved or Dirt; Use P and D)	Fee Collection	Visitor Protection	Refuse Containers	Toilet Facilities (Flush or Vault; use F or V)	Campfire Ring	Shade Ramada (Use T for Trees)
Amenity Category										
High	Yes	Yes	Yes	Yes (P)	Yes	Yes	Yes	Yes (F)	Yes	Yes
Medium	Yes	Yes	Yes	Yes (P & D)	Yes	Yes	Yes	Yes (F & V)	Yes	Yes
Low	Yes	Yes	Yes	Yes (D)	Yes	Yes	Yes	Yes (V)	Yes	No (T)

Table 11 - Kingman Field Office Fee Site Fair Market Value Comparison with Amenity Description

Recreation Site	Site Fee	Amenity Category	Comparable Sites and Overall Summary
Burro Creek Individual Sites	\$14/per night	Medium	T.K Jones Campground, Hualapai Mountain County Park (RV Camping), Davis Camp County Park (RV Camping), Red Rocks Canyon (RV Sites), Oxbow Campgroup, Lower Wolf Creek Campground, Mingus Mountain Campground, and Whitehorse Lake Campground were all identified as comparable sites to the Burro Creek Campground individual sites. These comparable sites area managed by BLM, NPS, USFS, and Mohave County. The fee range of these sites ranged from \$10 per night to \$45 per night. The average cost per night of a site comparable to Burro Creek's individual sites was \$23.44 per night. Key differences of comparable sites focused on having full electric hookups for RVs, paved access roads within the site, type of toilet facility (flush versus vault), shade ramadas available at each site, and availability of drinking water. The higher end cost per night of comparable sites typically meant that full electric hookups were available, or road access was better but in many cases Burro Creek stood out for having drinking water, flush toilets, and shade ramadas at each

Recreation Site	Site Fee	Amenity Category	Comparable Sites and Overall Summary
			site. Road access may not be as good at Burro Creek but that is also related to a lack of funding to accomplish this task on a recurring basis or improve the area.
Burro Creek Group Sites	\$50/per night	Medium	Hualapai Mountain County Park (Group Site), Davis Camp County Park (Group Site), Red Rocks Canyon Group Site, Lake Mead National Recreation Area Group Site, and White Horse Lake Group Campground were all identified as comparable sites to the Burro Creek Campground group site. These comparable sites are managed by BLM, Mohave County, NPS, and USFS. The fee range of these sites ranged from \$80 per night to as high as \$225 per night. Since Mohave County Parks uses a fee range for their group reservation, the median fee that someone might pay was used to determine the comparable fee. The average cost per night of a site comparable to Burro Creek's group site was \$156.60 per night using median pricing for Mohave County Parks. The average cost per night using the low-end of Mohave County Parks pricing was \$121.60 per night. The higher end cost per night sites typically had much more developed facilities associated with Mohave County Parks such as large shade ramadas, room for more people, indoor seating areas, and access to playground equipment. The comparable sites that fell in the \$80 per night range lined up with Burro Creek more closely as they had drinking water, good access roads, vault toilets, and shade ramadas with similar space for groups. Burro Creek's group site stood out for access to flush toilets while road access, space, and ADA accommodations where somewhat lacking. ADA accommodations and road access could be improved with increased funding to complete such projects.
Burro Creek Dump Station	\$10 without reservation (free for overnight use)	N/A	Davis Camp County Park, Lake Havasu State Park, Cattail Cove State Park, Fort Beale RV Park, Fast Mart, and My Stop Convenience RV dump stations were all identified as comparable sites to the Burro Creek Campground RV Dump Station. These comparable sites are managed by Mohave County, ASPT, and Private entities. The fee range of these sites was \$15 to \$20 per RV, and all provided free water tank fill with RV dump. The public campgrounds also offered the dump station free with an overnight camping permit. The average cost to use a dump station without an overnight camping permit was \$16.25 . These RV dump stations had no difference with the Burro Creek RV Dump Station including free use with overnight camping.
Wild Cow Springs Individual Sites	\$8/per night	Low	Hualapai Mountain County Park (Dry Camping), Davis Camp County Park (Dry Camping), Red Rocks Canyon (Individual Walk-in Sites), Senator Wash North Shore, Oxbow, and Lower Wolf Creek Campgrounds were all identified as comparable sites to the Wild Cow Springs individual sites. These comparable sites are managed by Mohave County Parks, BLM, and USFS. The fee range of these sites ranged from \$10 per night to \$30 per night. The average cost per night of a site comparable to Wild Cow Spring's individual sites was \$17.00 per night . The predominant differences in the comparable sites identified for the Wild Cow Springs Campground were road access and access to drinking water at the site as well as more graded or even sites. Therefore, Wild Cow Springs would not fall into the range of a higher cost site due to the inability for BLM to greatly improve road access.
Wild Cow Springs Group Site	\$20/per night	Low	Kaibab Lake (Double Site), Christopher Creek Group, Ponderosa Group, and Turney Gulch Group campgrounds were all identified as comparable sites to the Wild Cow Springs Group Site. All these comparable sites are managed by the USFS. The fee range of these sites ranged from \$40.00 per night to \$100.00 per night. The average cost per night was \$73.75 per night. Since all of these comparable sites have access to drinking water or non-potable water, have larger group capacities, and better road access, the average comparable fee is likely too high. An issue that arose during the comparable search was to find another dry camping group site with similar high clearance 4WD access in this geographic area.
Windy Point	\$8/per night	Low	Hualapai Mountain County Park (Dry Camping), Davis Camp County Park (Dry Camping), Red Rocks Canyon (Individual Walk-in Sites), Oxbow, and Senator Wash North Shore Campgrounds were all identified as comparable sites to the Windy Point individual sites. These comparable sites are managed by Mohave County Parks and BLM. The fee range of these sites ranged from \$10.00 per night to \$30.00 per night

Recreation Site	Site Fee	Amenity Category	Comparable Sites and Overall Summary
			while the average cost per night considering all four sites was \$19.25 per night. However, Windy Point is much less developed than the Mohave County Parks managed sites to some extent however the setting and available amenities are somewhat comparable apart from the availability of drinking water. The two BLM managed sites are more closely comparable to Windy Point in that they do not provide drinking water. The average cost per night of those two sites is \$13.50 per night.

Table 12 - Fair Market Value Comparable Site Descriptions and Evaluation

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
T.K. Jones Campground	BLM	\$15 per night	Medium	Burro Creek Individual Sites	No (see notes)	The fee at T.K. Jones has not been evaluated since it was used as a comparable in 2007.
Hualapai Mountain County Park (Dry Camping)	Mohave County	\$30 per night	Medium	Wild Cow and Windy Point Campgrounds	Yes	Hualapai Mountain has similar access roads but there is closer access to more developed amenities such as drinking water. Similar to dry camping sites at Wild Cow and Windy Point.
Hualapai Mountain County Park (RV Camping)	Mohave County	\$45 per night	Medium	Burro Creek Individual Sites	Yes	Similar to Burro Creek for access roads but RV sites have full hookups where Burro Creek does not. Hualapai Mountain park only provides access to vault toilets not flush and there is no shade available at Hualapai Mountain.
Hualapai Mountain County Park (Group Sites)	Mohave County	\$150 - \$300 per night	Medium	Burro Creek Group Site	Yes	Similar to Burro Creek with quality of access roads, access to shade ramada, and drinking water. Hualapai Mountain provides vault toilets

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
						rather than flush toilets though.
Davis Camp County Park (Dry Camping)	Mohave County	\$20 per night	Medium	Wild Cow Springs and Windy Point Campgrounds	Yes	Davis Camp dry camping accommodations are far fewer than that of their group and RV site and so therefore are more comparable to Wild Cow Springs and Windy Point apart from offering drinking water which neither KFO site does.
Davis Camp County Park (RV Camping)	Mohave County	\$40 per night	Medium	Burro Creek Individual Sites	Yes	Davis Camp offers full hookups at their RV sites whereas Burro Creek does not but Burro Creek does provide individual shade structures and flush toilets. Overall, Davis Camp is more developed from an RV camping standpoint.
Davis Camp County Park (Group Sites)	Mohave County	\$100 - \$300 per night	High	Burro Creek Group Site		Davis Camp provides personal fee collection, water access, drinking water, but has vault toilets. Burro Creek provides flush toilets. Therefore, there is a caveat to it's high development status as the site should have flush toilets.
Red Rocks Canyon (Individual RV Sites)	BLM	\$25 per night	Medium	Burro Creek Individual Sites	Yes	These sites are similar to Burro Creek in terms of RV accessibility but lack a shade structure at each site and access to flush toilets. Burro Creek would provide a slightly more developed experience.
Red Rocks Canyon	BLM	\$12 per night	Medium	Wild Cow Springs and Windy Point Campgrounds	Yes	These sites at Red Rocks are similar to the available

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
(Individual Walk-in Sites)						amenities at Wild Cow and Windy Point although these sites provide drinking water.
Red Rocks Canyon Group Site	BLM	\$80 per night	Medium	Burro Creek Group Site	Yes	Red Rocks Group is similar to Burro Creek but with more group sites and larger shade ramadas and better access roads. Burro Creek has flush toilets and water access where Red Rocks has vault toilets and no water access.
Senator Wash North Shore	BLM	\$15 per night	Low	Wild Cow Springs and Windy Point Campgrounds	No (see notes)	The fee at Senator Wash North Shore has not been evaluated since it was used as a comparable in 2007.
Lake Mead National Recreation Area Group Site	NPS	\$80 per night	High	Burro Creek Group Site	Yes	This NPS site has paved roads and access to flush toilets but there are no large shade ramadas available for group camping as is the case with Burro Creek. Road access is better at this site and there is personal fee collection available.
Oxbow Campground	BLM	\$15 per night	Low	Burro Creek Campground Individual sites and Wild Cow Springs Campground	No (see notes)	The fee at Oxbow has not been evaluated since it was used as a comparable in 2007.
Lower Wolf Creek Campground	USFS	\$10 per night (\$5 extra vehicle fee)	Medium	Burro Creek Campground Individual Sites and Wild Cow Springs Campground	Yes	Road access is much more developed with paved and dirt roads but there is no drinking water available so it could relate to Burro Creek but is more closely correlated to Wild

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
						Cow Springs as Burro Creek has Flush Toilets, Drinking Water, and Shade Ramadas.
Mingus Mountain Campground (non-electric individual site)	USFS	\$10.00 per night (Increase to \$18.00 per night currently in progress for approval)	Medium	Burro Creek Campground Individual Sites	Yes	Comparable to Burro Creek, but without flush toilets as Burro Creek has. Better maintained access roads. Currently under evaluation for fee increase from \$10 per night to \$18 per night.
Kaibab Lake Campground (Double Sites)	USFS	\$40.00 per night	Medium	Wild Cow Springs Group Site	Yes	Although not a group site, comparable to Wild Cow Springs group site from a setting perspective and from the actual group site development. This site however has water available (non-potable) and the ability to accommodate larger groups.
Christopher Creek Group Campground	USFS	\$80.00 per night	Medium	Wild Cow Springs Group Site	Yes	Comparable to Wild Cow Springs group site from a setting perspective and from the actual group site development. This site however has water available (nonpotable) and the ability to accommodate larger groups.
Ponderosa Group Campground	USFS	\$100.00 per night	Medium	Wild Cow Springs Group Site	Yes	Comparable to Wild Cow Springs group site from a setting perspective and from the actual group site development. This site however has drinking water and the ability to accommodate larger groups and a paved

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
						driveway surface with parking for RVs.
Turney Gulch Group Site	USFS	\$75.00 per night	Medium	Wild Cow Springs Group Site	Yes	Turney Gulch is accessed via a high clearance 4WD road similar to Wild Cow but provides drinking water and access for larger groups. Overall, Turney Gulch provides more amenities than Wild Cow Spring's group site but similar access,
Crossroads Campground	BLM	\$5.00 per night	Low	Wild Cow Springs and Windy Point	No (see notes)	The fee at crossroads has not been evaluated since it was used as a comparable in 2009.
White Horse Lake Campground	USFS	\$28.00 per night	Medium	Burro Creek Campground Individual Sites	Yes	White Horse Lake has paved access roads and potentially better graded sites, but Burro Creek has flush toilets and individual shade ramadas. Both sites provide water access. Overall, White Horse Lake provides more highly developed amenities despite not having flush toilets or shade ramadas.
White Horse Lake Group Campground	USFS	\$198	Medium	Burro Creek Group Site	Yes	White Horse Lake has paved access roads and potentially better graded sites and ADA access to group area and restrooms, but Burro Creek has flush toilets and a large shade ramada. Both sites provide water access. Overall, White Horse Lake provides more highly developed amenities despite not having

Campground	Operating Agency	Site Fee	Amenity Category (see Table 10)	Comparable KFO Site	Use as Comparable Site (Yes or No)	Key Points to Consider
						flush toilets or a shade ramada.
My Stop Convenience (Phoenix, AZ) Dump Station	Private	\$15.00	N/A	Burro Creek Dump Station	Yes	Burro Creek will continue to include the use of the dump station with an overnight reservation. All comparable dump stations have an independent rate higher than Burro Creek.
Fort Beale RV Park Dump Station	Private	\$20.00	N/A	Burro Creek Dump Station	Yes	See above for My Stop Convenience.
Fast Mart Chevron (Wickenburg, AZ) Dump Station	Private	\$15.00	N/A	Burro Creek Dump Station	Yes	See above for My Stop Convenience.
Davis Camp County Park Dump Station	Mohave County	Free with overnight camping (no use available to non- campers)	N/A	Burro Creek Dump Station	Yes	See above for My Stop Convenience.
Lake Havasu State Park Dump Station	ASPT	\$15.00, free with overnight camping	N/A	Burro Creek Dump Station	Yes	See above for My Stop Convenience.
Cattail Cove State Park Dump Station	ASPT	Free with overnight camping (no use available to non- campers)	N/A	Burro Creek Dump Station	Yes	See above for My Stop Convenience.