

Business Plan for Cedar Mesa Fiscal Year 2019



United States Department of the Interior
Bureau of Land Management, Utah
Canyon Country District
Monticello Field Office
January 2019

RECOMMENDATIONS, REVIEWS, AND APPROVALS

Recommended by:

Amber Denton Johnson
Assistant Field Manager, Recreation

Date

Reviewed by:

Monticello Field Manager

Date

Approved By:

Lance Porter
Canyon Country District Manager

Date

This business plan was prepared pursuant to the Federal Lands Recreation Enhancement Act (Public Law 108-447) and BLM recreation fee program policy. It establishes future management goals and priorities for the Cedar Mesa recreation fee program in the Monticello Field Office.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Monticello Field Office

P.O. Box 7

Monticello, UT 84535

<http://www.blm.gov/utah/monticello>



In Reply Refer to:
2932 (UTY-020)

Dear Reader,

I would like to present for your review and comment the *Business Plan for Cedar Mesa Fiscal Year 2019*. The Bureau of Land Management (BLM), Monticello Field Office (MFO) currently manages permitting of recreation use in the following areas in the Cedar Mesa Special Recreation Management Area (SRMA) Special Area: Grand Gulch Primitive Area, Fish and Owl Canyons, McCloyd Canyon, Road Canyon, Lime Canyon, Slickhorn Canyon, Mule Canyons, and Butler Wash. Butler Wash was included in the Shash Jáa unit of the Bears Ears National Monument (BENM). The BLM designated Cedar Mesa as a Special Area in the 2008 Monticello Resource Management Plan. The Special Area annually provides approximately 130,000 visitors with outstanding recreational opportunities on their public lands.

The BLM is proposing to increase Individual Special Recreation Permit (ISRP) fees charged for day and overnight use at existing fee sites within the Cedar Mesa SRMA Special Area and expand the existing ISRP fee to sites in Butler Wash within the Comb Ridge Recreation Management Zone (RMZ), which was authorized in the 2008 RMP. The BLM also proposes to implement the allocated permit system at Moonhouse year-round. Historically, seasonal staffing limitations have resulted in that allocation system only being managed in the spring and fall. All ISRP fees, including any new fees, would be deposited into an account specifically for the management of the Cedar Mesa Special Area recreation program.

The *Business Plan for Cedar Mesa Fiscal Year 2019* was originally presented for public comment and review from December 7, 2018 to January 7, 2019. The plan was then presented to the Utah Recreation Resource Advisory Council for formal review and the 15-member panel approved the plan and the proposed fee increases on January 11, 2019. After incorporating public comments, the final Business Plan for Cedar Mesa was signed and approved by the BLM on **January 15, 2019**.

Comments may be mailed to BLM, Monticello Field Office, P.O. Box 7, Monticello, UT, 84535 or e-mailed to BLM_UT_MT_Comments@blm.gov (please put "Cedar Mesa Business Plan" in subject line). Comments are due by January 7, 2019. Thank you for your interest in your public lands.

Contents

Executive Summary.....	6
Introduction.....	6
Background and Authorities.....	7
Introduction to the BLM Monticello Field Office Recreation Fee Program.....	8
Administrative Unit.....	8
Monticello Field Office Recreation Program and Visitation.....	9
Chart 1: Annual Recreation Visits to the BLM Monticello Field Office.....	10
Monticello Field Office Recreational Permit Program.....	10
Applicable Plans.....	10
Description of Existing and Proposed Fee Sites within the Cedar Mesa SRMA	11
Cedar Mesa Special Area.....	11
Reasonably Foreseeable Actions.....	12
Kane Gulch Ranger Station.....	13
Cedar Mesa Permit System – Fees and Allocations.....	14
Table 1: Current Cedar Mesa Permit and Fee Structure.....	14
Commercial and Organized Group SRP Use.....	15
Visitation Patterns.....	15
Table 2: Total Visitors to Cedar Mesa Permitted Trails and the Comb Ridge RMZ.....	15
Visitor Demographics.....	16
Partnerships and Volunteer Programs	16
Proposed Modifications to Recreation Fee Program.....	16
Table 3: Existing and Proposed Recreation Fee Rates for the Cedar Mesa Special Area	17
Operating Costs	17
Actual Annual Operating Cost.....	17
Additional Costs.....	19
Revenues	19
Table 4: Cedar Mesa Special Area Permit Fee Revenues.....	19
Priorities of Future Expenditures.....	20
Expenditures Critical to Operation.....	20
Future Expenditures for On-going Program Services.....	20
Future Expenditures for Program Improvements.....	20
Analysis of Recreation Fee Rates.....	21
Need to Analyze Recreation Fee Rates.....	21
Table 5: Annual Cedar Mesa Special Area Expenditures and Revenues.....	21
Fair Market Calculation Method.....	21
Table 6: Comparable fees charged by other nearby sites.....	22
Anticipated Impacts from Changing and Not Changing Recreation Fee Rates.....	22
Anticipated Impacts of Changing Fees.....	22
Table 7: Five-year projected ISRP revenues.....	23
Table 8: Projected Expenditures and Revenue.....	24

Anticipated Results of Not Modifying the Current Fee Rates.....	24
Public Outreach.....	25
References.....	25

Business Plan for Cedar Mesa

Fiscal Year 2019

Executive Summary

The BLM has determined that it is necessary to issue ISRPS in the Cedar Mesa area based on planning decisions, cultural resource concerns, potential user conflicts, and public health and safety concerns. The Cedar Mesa Special Recreation Management Area (SRMA) is designated as a Special Area in the Monticello Resource Management Plan 2008 (2008 RMP). For the purpose of this document the Cedar Mesa SRMA and Special Area will be referred to as the Cedar Mesa Special Area. This business plan recommends that the BLM:

- Increase the Cedar Mesa Individual Special Recreation Permit (ISRP) fees and eliminate the variable fee “seasons” for overnight backpacking trips to Cedar Mesa canyons. Fees for backpacking will go from \$8 per person per trip in the on-season and \$5 per person per trip in the off-season to \$15 per person per trip year-round.
- Increase Cedar Mesa ISRP fees for a single day of use from \$2 per person per day to \$5 per person per day, the week-long pass for day use from \$5 per person per week to \$10 per person per week, and the annual pass vehicle hangtag for day use from \$20 per vehicle per year to \$40 per vehicle per year.
- Manage Butler Wash as part of the existing Cedar Mesa permit system, including regulations and permit fees.
- Implement the allocated permit system at Moonhouse year-round.

Increased visitation without a commensurate increase in visitor services is resulting in negative impacts to archeological sites, natural resources, and the visitor experience at Cedar Mesa. In order to mitigate potential damage, it is critical to improve the facilities, update signage, and increase the ranger presence at the sites and trailheads. The fee increase is necessary in order to meet growing personnel expenses and to improve non-personnel visitor services, such as trailhead kiosks with directional, etiquette, and interpretive information.

Introduction

The BLM originally began collecting recreational fees for the use of public lands under the authority of the Federal Lands Policy and Management Act of 1976 (FLPMA). The Federal Lands Recreation Enhancement Act of 2004 (FLREA) provides the BLM with its current authority to collect recreational fees, and allows the agency to collect Special Recreation Permit (SRP) fees for specialized uses of federal lands and waters. The act authorizes the BLM to locally retain collected recreation fees and outlines how revenues may be used for such things as facility repair, facility maintenance, facility enhancement, interpretation, visitor information, visitor services, visitor needs assessments, signs, habitat restoration, law enforcement related to public use and recreation, and operating or capital costs directly associated with the Recreation and Visitor Services Program.

FLREA guidelines and the BLM 2930 Manual and Handbook require that each recreation fee program have a business plan that thoroughly discusses fees and explains how fees are consistent with the criteria set forth in FLREA and other agency directives. Business plans assist management in determining appropriate fee rates, outline the cost of administering fee programs, and identify priorities for future fee program expenditures. The primary purpose of the plan is to serve as public notification of the objectives for use of recreation fee revenues and to provide the public an opportunity to comment on these objectives.

A portion of the Cedar Mesa SRMA, including the Comb Ridge RMZ, is contained within the boundaries of the Shash Jáa unit of the Bears Ears National Monument (BENM). The Moonhouse site and a portion of the McCloyd Canyon-Moonhouse RMZ were also included as a satellite unit of the BENM. Throughout this document when we refer to the Cedar Mesa Special Area, we are also including those portions of the Cedar Mesa SRMA that were incorporated into the BENM (See Maps 1, 2, and 3). All ISRP fees, including any new fees, would be deposited into an account specifically for the management of the Cedar Mesa SRMA recreation and visitor services program.

Background and Authorities

The authorities and regulations for this business plan are:

- **The Federal Land Policy and Management Act (FLPMA) of 1976** (Public Law 94-579), contains BLM's general land use management authority over the public lands, and establishes outdoor recreation as one of the principal uses of those lands. Section 302 (b) of FLPMA authorizes the BLM to manage the use of the public lands through permits.
- **The Federal Lands Recreation Enhancement Act of 2004** (Public Law 108-447), repealed applicable portions of the Land and Water Conservation Fund Act and replaced BLM's authority to collect recreational fees. This law authorizes the BLM to collect recreation fees at sites that meet certain requirements, allows the BLM to keep the fee revenues at the local offices where they are collected, and directs how the BLM will manage and utilize these revenues. Section 803 contains the BLM's authority to issue permits and charge a permit fee for use of the Cedar Mesa SRMA. Section 803 (h) authorizes the BLM to require SRPs and fees associated with specialized recreation uses of federal lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.
- **Code of Federal Regulations, Title 43, Part 2930 (43 CFR 2930)**, contains the regulations governing the BLM's recreation permitting programs. 43 CFR, Subpart 2932.11(b) contains the BLM's authority to issue permits for use of the Cedar Mesa SRMA. It states that, "If BLM determines that it is necessary, based on planning decisions, resource concerns, potential user conflicts, or public health and safety, we may require you to obtain a Special Recreation Permit for – (1) Recreational use of special areas." A "special area" is where the BLM determines that the resources require special management and control measures for their protection. Permits for the Cedar Mesa SRMA are to protect Cedar Mesa's outstanding cultural and primitive recreation values.

- ***BLM Recreation Permit Administration Handbook (H-2930-1)***, explains how the BLM implements its recreation permit and fee program. Chapter 1, page 1-4 and 1-26, sections (D) and (G) specifically address SRP fees for Special Areas and application fees for Special Recreation Permits.

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

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

The BLM strives to manage recreation and visitor services to serve diverse outdoor recreation demands while helping to maintain sustainable setting conditions needed to conserve public lands, so the visitor's desired recreation choices remain available. The BLM's goals for delivering recreation benefits from the BLM-administered lands to the American people and their communities are:

- establish secure and reliable funding sources by using collected fees to their maximum potential to develop recreation benefits;
- facilitate greater well-being and economic benefits within communities;
- modernizing our organization and infrastructure for the next 100 years by prioritizing infrastructure needs and reducing deferred maintenance backlogs; and
- expanding outdoor recreation and access by enhancing public satisfaction at DOI sites.

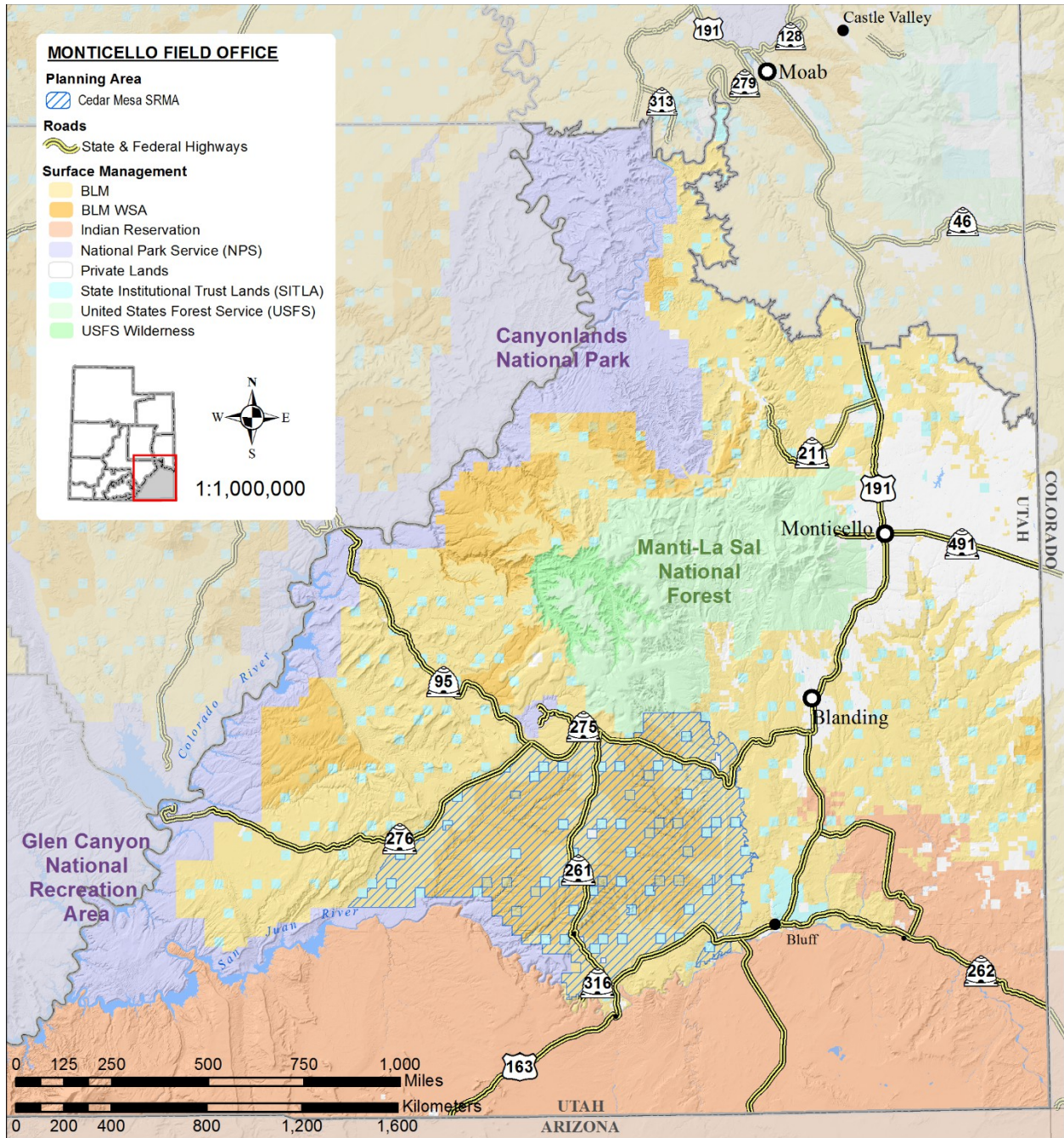
In addition, the Business Plans complements the BLM's Leadership Priorities of serving the American family, getting America back to work and creating a conservation stewardship legacy.

This business plan will assist the MFO in meeting these recreation and visitor service goals for Cedar Mesa SRMA users. Cedar Mesa SRMA is managed through the BLM's ISRP program and operations are supported through appropriated funds and revenues generated by fees.

Introduction to the BLM Monticello Field Office Recreation Fee Program

Administrative Unit

The BLM MFO is one of two offices in the BLM Utah's Canyon Country District, and is the administrative unit responsible for the Cedar Mesa SRMA fee program. The MFO manages approximately 1.8 million acres of public lands in San Juan County, Utah and is located in Utah's Third Congressional District.



Map 1: Monticello Field Office

Monticello Field Office Recreation Program and Visitation

The MFO has an extensive recreation program. A spectacular landscape and rich archeological resources provide visitors with an abundance of recreational opportunities. Recreational activities within the MFO include camping, backpacking, hiking, off-highway vehicle (OHV) use, whitewater boating, rock climbing, canyoneering, visiting archaeological sites, and driving scenic byways. Features such as the Bears Ears National Monument, San Juan River, Grand Gulch and Cedar Mesa, Indian Creek, Dark Canyon, Valley of the Gods, Comb Ridge, the Hole in the Rock Trail, and White Canyon attract visitors

from all over the world, who recreate both privately and by hiring commercial outfitters. The MFO manages public lands that border Canyonlands National Park, Glen Canyon National Recreation Area, and surround Natural Bridges National Monument, Goosenecks State Park, and the Abajo/Elk Ridge unit of the Manti La Sal-National Forest.

The BLM recorded 427,208 visits to BLM-administered lands within the MFO's boundaries in 2018, as per the BLM's Recreation Management Information System (RMIS). Due to the remote and expansive nature of the backcountry within the MFO, it is likely that actual visitation exceeds recorded visitation. Recorded visitation to the MFO has increased significantly over the last several years, consistent with regional trends of year-over-year increases of approximately 18% observed by adjacent National Park Service (NPS) Unit and BLM Field Offices in Utah. (Leaver, 2018, pg. 8).

Chart 1: Annual Recreation Visits to the BLM Monticello Field Office

In addition to an increase in visitation across the Field Office, the MFO has witnessed a surge in visitation subsequent to the establishment of the BENM by Presidential Proclamation 9558 on December 28, 2016. The BENM, as amended by Presidential Proclamation 9681, includes one unit located entirely within the boundary of the Planning Area. The BLM expects the long-term growth trend to continue and anticipates continued increase in recreational visits related specifically to interest in the BENM.

Monticello Field Office Recreational Permit Program

The MFO recreational permit program includes Recreational Use Permits (RUPs), SRPs, and ISRPs. The MFO currently manages five campgrounds (Sand Island, Hamburger Rock, Superbowl, Creek Pasture, and Indian Creek Falls) as RUP fee sites in accordance with the Monticello Campgrounds Business Plan. Commercial, competitive, and organized group operators provide a multitude of guided activities including backpacking, rock climbing, canyoneering, wilderness therapy, heritage tours, horseback riding, and OHV tours under the SRP program. The San Juan River Business Plan covers both commercial (SRP and ISRP) and non-commercial (ISRP) recreation permits for whitewater boating on the San Juan River.

The Proposed Plan addresses non-commercial ISRPs for hiking and backpacking in the canyons of the Cedar Mesa SRMA. Because the ISRP fee is applied to commercial and organized group use in addition to SRP fees (H-2930-1, p. 1-23 & 1-25), this fee change will also affect fees paid by commercial and organized group SRPs in addition to individual users.

Applicable Plans

Management in the MFO is guided by the Monticello Field Office Approved Resource Management Plan (RMP), which was signed November 17, 2008. The BLM made specific decisions concerning the Cedar Mesa SRMA, including SRPs. These are:

REC-17 (pg. 91): SRPs will be issued as a discretionary action as a means to help meet management objectives, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors.

REC-48 (pg. 95): General SRMA Guidelines: All SRMAs will be designated as special areas under the Land and Water Conservation Fund (LWCF) definition. As per the Land and Water Conservation Fund Act and the Federal Lands Recreation Enhancement Act, this could require permits and payment of fees for recreation use.

Cedar Mesa SRMA: Goal and Objectives (page 98): Provide outstanding recreational opportunities and visitor experiences while protecting natural and cultural resource values through integrated management between the BLM and NPS. Provide a safe, natural well-designed accessible recreational experience for all visitors to enjoy the world renowned cultural resources and scenic values. Use visitor information and interpretation as a primary tool to protect sensitive resources, discourage vandalism, and encourage visitor appreciation of public lands.

REC-107 (page 102): Private group size limited to 8 people per day per trailhead for overnight trips.

REC-108 (page 102) Commercial group size limited to 12 people per day per trailhead. One commercial group per trailhead per day. Commercial guides are required to meet all pertinent state guidelines.

REC-109 (Page 102-103) *Trailhead Allocations* Total Overnight Visitors Per Day: Kane 20, Bullet 20, Government 20, Collins 20, Fish/Owl 20, Road Canyon 20, Lime Creek 20, Mule Canyons 20, Slickhorn Canyons 20. If commercial cap limits are not met on a given day, additional private visitors will be allowed provided the overall cap of 20 people per trailhead is not exceeded.

REC-114 (page 104) Butler Wash, if necessary, will be managed as part of the existing Cedar Mesa permits and regulation system, including regulations and permit fees.

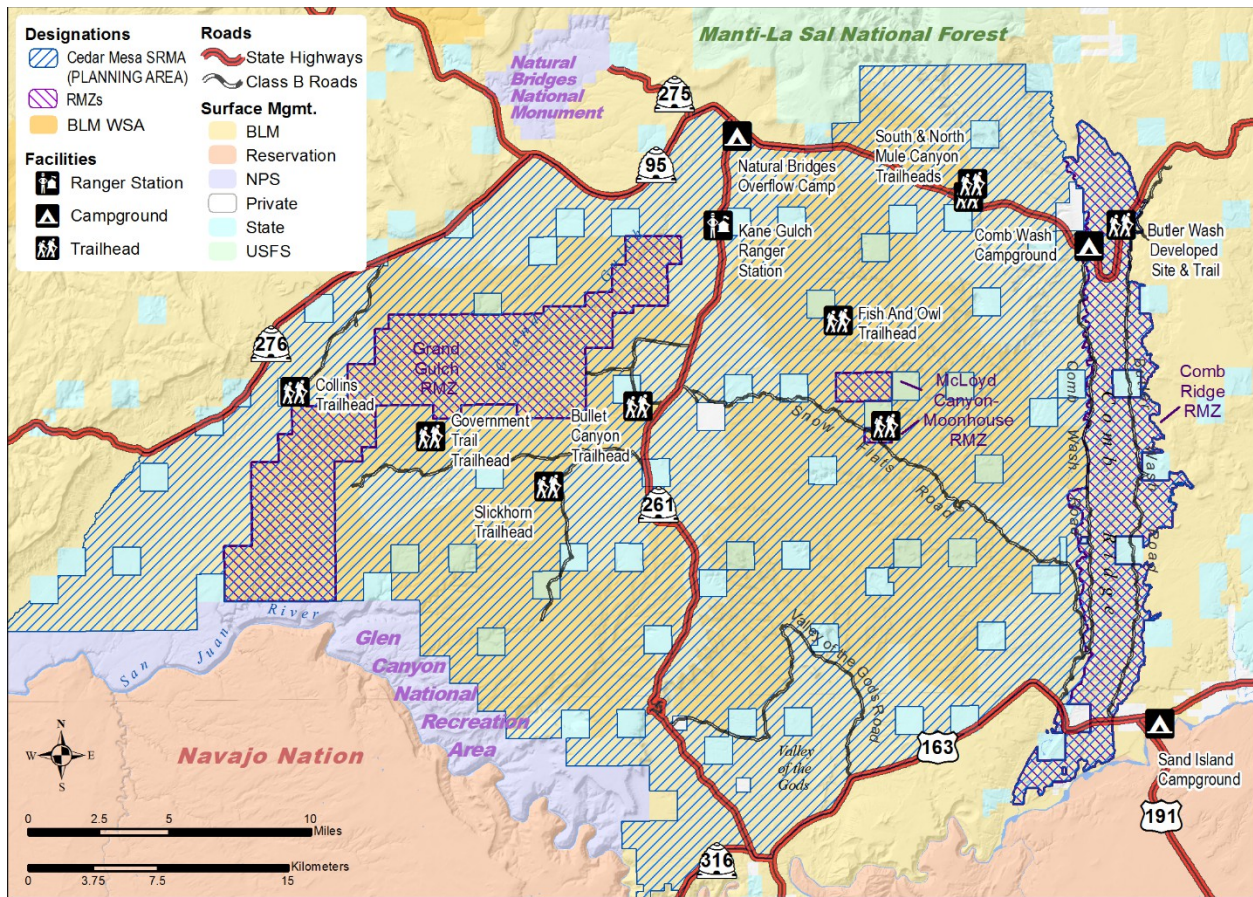
REC-117 (page 104) This (McLloyd Canyon-Moon House) RMZ occurs within the Fish Creek Canyon WSA and is managed under the IMP [Interim Management Plan]. In addition to this management, the following prescriptions will apply:

- Public access limited via a permit system for day visits.
- No more than 36 people allowed to visit Moon House per day. Limitations on visitation may change based on site monitoring of impacts of visitation.

Description of Existing and Proposed Fee Sites within the Cedar Mesa SRMA

Cedar Mesa Special Area

The Cedar Mesa area of the Grand Gulch Plateau is an area of regional, national, and international significance for recreational use and cultural sites. It is located in San Juan County, UT approximately 25 miles west of the town of Blanding and 10 miles north of the town of Mexican Hat. The Special Area is located in the Colorado Plateau physiographic region.



Map 2: The Planning Area - Cedar Mesa SRMA

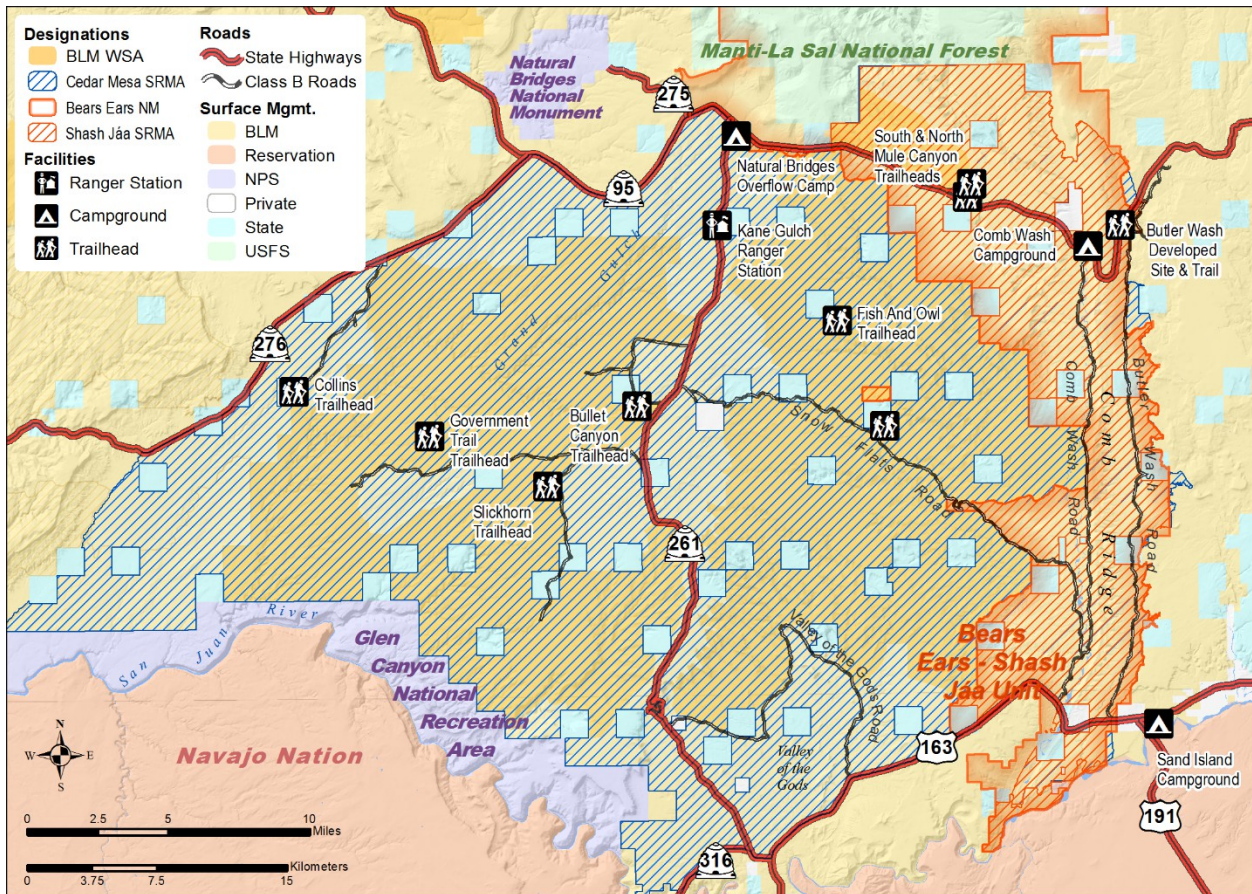
The major attractions of Cedar Mesa Special Area are cultural sites and scenic geology. Most visitors access the area via the Trail of the Ancients National Scenic Byway, which includes Highway 163, State Route 261, State Route 95, and the Valley of the Gods Road. Those seeking a backcountry or middle-country experience may explore the canyons of Cedar Mesa, Comb Wash, and Butler Wash by day hiking, backpacking, and horseback riding. Although Cedar Mesa Special Area is largely undeveloped, visitors encounter educational and safety messaging at trailheads, developed sites, and a ranger station.

Reasonably Foreseeable Actions



The BENM, as amended by Presidential Proclamation 9681, incorporates the eastern portion of the Cedar Mesa SRMA into the Shash Jáa Unit (see Map 3). This includes the entire Comb Ridge RMZ, a portion of the McLoyd Canyon-Moonhouse RMZ, the Mule Canyon developed site, South and North Mule Canyon trailheads, and the Butler Wash developed site. The BLM is currently preparing a Monument Management Plan for the BENM. Under all Action

Alternatives (Alternatives B, C, and D), the portion of the Cedar Mesa SRMA currently within the BENM would be managed as the Shash Jáa SRMA, while the remainder of the Cedar Mesa SRMA would be managed as the Cedar Mesa SRMA. Regardless of which alternative the BLM selects for the Monument Management Plan, the Planning Area would remain the same. In the event that the BLM selects Alternative B, C, or D, this business plan would apply to both the Cedar Mesa SRMA and the Shash Jáa SRMA.



Map 3: SRMAs as identified in BENM Management Plan Alternatives B, C, or D

Kane Gulch Ranger Station

The Kane Gulch Ranger Station (KGRS), located at the main access point into the Grand Gulch canyon system, is the primary administrative site for the management of the Cedar Mesa Special Area. KGRS

has served the public since 1972, and has become a destination for visitors seeking information and permits. The BLM employees and volunteers, who live and work at KGRS seasonally from mid-February to November, staff the ranger station and conduct backcountry patrols. Developments at the KGRS include one full-size mobile home, one travel trailer, three “tiny home” trailers, a solar electric



facility, a double vault toilet, parking area, interpretive panels, water facility, a helipad for search and rescue, and a generator shed. A new ranger station was constructed in 2006 and has approximately 1,379 square feet of heated space. KGRS features interpretive displays, an audio-video room to view the backcountry education video, and a small Canyonlands Natural History Association shop with educational and safety items.

Cedar Mesa Permit System – Fees and Allocations

Revenues from Cedar Mesa fees are used to maintain Cedar Mesa Special Area recreation facilities, administer the allocated permit program, provide law enforcement services, and provide ranger staffing and patrols for resource protection and public safety. The initial Cedar Mesa Permit System instituted in 1992 applied only to Grand Gulch, but the system was subsequently expanded to include in-canyon use at Fish/Owl, Road Canyon, Lime Creek, Mule Canyons, and Slickhorn Canyons. The current fee structure is variable based on type of use and season, with seven-day and annual discount passes for day use. The per-person SRP fees for the Cedar Mesa Special Area have not changed since the BLM increased fees in 1999. The 2008 RMP included Butler Wash in the Cedar Mesa SRMA and added it to the Special Area permit and fee system.

Table 1: Current Cedar Mesa Permit and Fee Structure

Permit Type	Price	Allocation	Availability
Overnight (backpacking) on-season 3/1 – 6/15 & 9/1 – 10/31	\$8/person	36 people per trailhead per day	Reserve up to 12 on Recreation.gov Remainder as walk-ins at KGRS
Overnight (backpacking) off-season 11/1 – 2/28 & 6/16 – 8/31	\$5/person	N/A	Unlimited at trailhead
One-day pass for day use	\$2/person	N/A	KGRS (on-season) or trailhead
Seven-day (one week) pass for day use	\$5/person	N/A	KGRS (on-season) or trailhead
Annual (calendar year) pass for day use	\$25/person	N/A	MFO or KGRS (on-season)

Permits are required to hike in the canyons at Cedar Mesa. Visitors may obtain day use passes at the KGRS when it is open or at trailheads at any time. There is no permit required for mesa-top use, including camping, but there is a group size limit of 24. During peak seasons overnight permits and permits for Moonhouse may be obtained at the Kane Gulch Ranger station on Cedar Mesa or at the Recreation.gov website. During the off-season users can obtain overnight ISRPs and ISRPs for Moonhouse at trailhead kiosks. The group size is 12 for private and commercial use for all in-canyon use regardless of the season. To disperse use, eliminate crowding during the peak season, and to ensure a primitive recreation experience, the number of private and commercial parties starting each day from trailhead entrance points is limited to 20 people per trailhead per day for overnight trips during the season. Moonhouse is limited to 36 people as per the 2008 Monticello RMP, but due to seasonal staffing



limitations, this allocation has not been enforced in the off-season. Day use permits other than Moonhouse are not allocated, but the group size limit of 12 still applies, and larger groups must split up.

Commercial and Organized Group SRP Use

The Cedar Mesa program receives fee revenues from commercial Cedar Mesa SRP holders (3% of gross revenue) and Organized Groups (\$6 per person per day), as well as the day use and overnight use per-person ISRP fees charged for both private and commercial use of the Cedar Mesa. About 80% of commercial and organized group trips involve overnight use, while approximately 20% are day-use only. Commercial and Organized Group SRP use has increased in recent years, but less substantially than private use. As commercial SRP rates are set by national BLM policy and regulation, only per-person ISRP fees would change under this proposal. The 2008 RMP allows for up to 30% commercial use on the Cedar Mesa Special Area.

Visitation Patterns

Visitation patterns at Cedar Mesa Special Area have shifted dramatically in the last three years. Average visitation on all permitted trails has risen each year since 2014, but relatively accessible sites along Highway 95 such as South Mule Canyon (home to the photogenic House on Fire granary) have witnessed a sharp spike in day use subsequent to the designation of BENM at the end of 2016 (Jew, 2017). Similarly, visitor numbers from the Comb Ridge RMZ, including Butler Wash Road and the Butler Wash developed sites, demonstrate rapidly increasing interest in the short day hikes available in those locations.

Table 2: Total Visitors to Cedar Mesa Permitted Trails and the Comb Ridge RMZ

Year	Cedar Mesa Private Overnight¹	Cedar Mesa Private Day Use²	Cedar Mesa SRP Day and Overnight³	Cedar Mesa Permitted Total	Comb Ridge RMZ
2014	2,231	7,251	699	10,181	12,283
2015	2,411	7,857	733	11,001	12,048
2016	2,883	7,599	1,011	11,493	14,540
2017	3,158	12,589	1,163	16,910	16,957
2018	3,334	12,930	N/A ³	N/A ³	20,330
% Use Increase	49%	78%	66%	66%	38%
% of Permitted Use	22%	71%	8%	100%	N/A

¹Visitor use numbers collected by KGRS

²Counts from envelopes at KGRS and self-serve permit stations

³Post-use reporting by SRPs is done at the end of the calendar year, so 2018 SRP data is not available

According to a 2012 University of Idaho Visitor Satisfaction Survey at Kane Gulch, 98% of respondents listed hiking as primary activity that they engaged in while at Cedar Mesa, 88% listed camping, 33% listed sightseeing, 20% listed wildlife viewing, and 17% listed education and interpretation. The BLM assumes that the changing visitation pattern has resulted in some corresponding change in primary activities. The permit numbers, counter numbers, and survey results all suggest that camping, hiking, and cultural site visitation are still important components in a satisfactory trip to Cedar Mesa Special Area, but interest in backpacking may be decreasing slightly.

Visitor Demographics



The 2012 Visitor Satisfaction Survey collected information about visitor's age, sex, and group size. Survey data shows that approximately half of Cedar Mesa Special Area visitors are between the ages of 22 and 40, while approximately 40% are between the ages of 50 and 70. Respondents tended to skew male (64%), and 96% and 91% of respondents had no children or teenagers, respectively, in the group. However, 7% of respondent who did have teenagers in the group had 6 or more teenagers, and 22% of overall visitors recorded were teenagers. This suggests that the survey respondents

included one or more groups of teenagers traveling with commercial outdoor education SRPs such as NOLS, Colorado Outward Bound, High Mountain Institute, and several private high schools and colleges that make annual trips to Cedar Mesa Special Area.

The BLM compiled data regarding the state of origin for visitors using the billing addresses of overnight permittees on Cedar Mesa. Billing addresses are only compiled for visitors who pay for their permit with credit card, which weighs heavily towards overnight (backpacking) visitors, who visit primarily from Utah and neighboring Colorado. Data for the visitor origin for commercial SRP visitors at Cedar Mesa Special Area is unavailable. However, it is likely that the origin of visitors traveling with a commercial operator is much more widespread than that of private users, with more national visitation from beyond the four corners states region and more international visitation.

Chart 2: Home States of Private Overnight Visitors based on Credit Card Billing Addresses

Partnerships and Volunteer Programs

The Cedar Mesa Special Area fee program is heavily dependent on partner and volunteer support. One to four volunteers are typically on staff at the KGRS during the on-season to assist with issuing permits, providing visitor information, and backcountry patrols. In addition, volunteer groups perform organized trail maintenance and site stewardship, which protect the resource and improve the visitor experience. A partnership with the Edge of the Cedars State Park and Museum in Blanding, UT, allows the BLM to host one employee there to answer questions and issue permits for the Cedar Mesa Special Area. A Site Steward program is also housed from Edge of the Cedars State Park and Museum. Another partnership with Friends of Cedar Mesa sources and helps provide training to Site Ambassadors. These volunteers provide friendly educational and interpretive contacts to visitors on trails.

Proposed Modifications to Recreation Fee Program

The MFO proposes simplifying the Cedar Mesa ISRP fee structure by eliminating the variable fee "seasons". This will have the effect of streamlining and simplifying fee categories for visitors to the area by creating a single year-round day use and overnight use fee. In addition, the variable allocation at Moonhouse would be streamlined into a year-round allocation of 36 visitors per day, with off-season permits issued via Recreation.gov, the Monticello Field Office, and possibly by cooperating facilities such as the Edge of the Cedars State Park and Museum. Fees would be raised for the first time in almost

20 years using the fair market calculation method. Table 3 summarizes existing fees and proposed fee increases.

Table 3: Existing and Proposed Recreation Fee Rates for the Cedar Mesa Special Area

Permit Type	Current Fee	Proposed Fee
Overnight (backpacking)	\$8/person “on season” \$5/person “off-season”	\$15 per person per trip <i>Would apply to all seasons</i>
One-day pass for day use	\$2/person	\$5 per person
Week-long (7 day) pass for day use	\$5/person	\$10 per person
Annual pass for day use	\$25/person	\$40 (hangtag)

The 2008 RMP identified Butler Wash in the Comb Ridge RMZ as a future Cedar Mesa Special Area permit area and the entire Comb Ridge RMZ is currently a part of the Shash Jáa Unit of the BENM. The BLM is also proposing to begin charging fees to cover day hiking to sites at Butler Wash, which would include sites accessed via the Butler Wash Road, Butler Wash developed site, and Butler Wash north of State Route 95.

Fees at Butler Wash are being proposed due to the increase in recreational day use and associated impacts to the area. This increase in visitor impacts has created a need to provide additional infrastructure and services including parking, trail maintenance, interpretation and directional signage, toilets, and BLM park ranger patrols to protect fragile cultural and natural resources.



Fees for sites in Butler Wash would be identical to those charged across Cedar Mesa Special Area. Visitors who wanted to hike to several Butler Wash sites in one day or wanted to combine Butler Wash hiking with trips to Cedar Mesa canyons on a day use pass or seven-day pass would pay a single fee.

Operating Costs

Actual Annual Operating Cost

Annual operating costs for the Cedar Mesa Special Area program include expenditures for permit administration, project planning, on-site permit and resource monitoring, law enforcement services, facility maintenance and cleaning, vault toilet pumping, parking lot maintenance, and trash disposal.

Eleven permanent employees and two temporary seasonal employees provide services to the Cedar Mesa Special Area SRMA. Some of these employees spend only a portion of their total work time providing services to the Cedar Mesa Special Area program. The labor expended by each employee is pro-rated

among the various fee accounts and programs in which they work. Four career-seasonal park rangers and up to two temporary seasonal park rangers provide staffing and visitors services at KGRS, on-site patrols, compliance checks, maintenance and cleaning, interpretation, and resource protection. Two BLM recreation maintenance employees ensure the cleanliness and safety of the facilities, including maintaining amenities and cleaning toilets with a high-pressure hot water system. Two law enforcement officers provide law enforcement and safety services. Three outdoor recreation planners provide support for administering SRPs, implementation planning for recreational facilities, and interpretation. An Assistant Field Manager and Supervisory Park Ranger oversee operations and employees at these facilities. In 2017 and 2018, 6 new permanent employees were added to the recreation staff, greatly increasing labor costs, and also greatly expanding the services provided to visitors. The labor costs for these recently added positions will be absorbed by a combination of fee dollars and appropriated funds.

The MFO maintains an extensive infrastructure that supports private and commercial Cedar Mesa Special Area recreation. The largest expense, aside from labor costs, is the operation of the Kane Gulch Ranger Station. Operations at Kane Gulch Ranger Station includes; the ranger station building and bookstore, a large solar system, five separate residences for park rangers and volunteers, a drinking water system, three vehicles, toilets (cleaning, pumping, and restocking), a warehouse, a parking lot, and trash removal.

Trailheads, kiosks, and dispersed camping areas in Cedar Mesa Special Area that are maintained by the MFO include:

- Kane Gulch Ranger Station
- Cedar Mesa Dispersed Camping
- Natural Bridges Overflow Camping Area
- Bears Ears and Deer Flat Dispersed Camping
- Comb Wash Campground
- Butler Wash Developed Site
- Arch Canyon Interpretive Site
- Mule Canyon Interpretive Site
- North Mule Canyon Trailhead
- South Mule Canyon Trailhead
- Fish and Owl Trailhead
- Todie Flat Trailhead
- Mormon Trail OHV Trailhead
- Sheiks Canyon Trailhead
- Government Trail Trailhead
- Collins Trailhead
- Valley of the Gods North Kiosk
- Snow Flat Kiosk
- Snow Flat Upper Kiosk
- Lower Fish Creek Trailhead
- Moon House Trailhead
- Cigarette Spring Kiosk
- Bullet Canyon Trailhead

- Slickhorn Trailhead
- Salvation Knoll Trailhead
- Butler Wash North Kiosk
- Butler Wash Dinosaur track site
- Butler Wash trailheads and parking areas
- Butler Wash South Kiosk
- Butler Wash Dispersed Camping



Additional Costs

Additional costs to the government of administering the Cedar Mesa permit program include managerial and administrative support, work by recreation planners and maintenance staff, hosting volunteer staff, and office overhead (including information services to the public). These costs are generally split between annual appropriated funds and fee accounts.

Revenues

Cedar Mesa revenues are currently generated from four sources: ISRP fees charged for private day use, ISRP fees charged for private overnight trips, ISRP fees associated with commercial groups, and the 3% of gross fee that commercial groups pay in addition to ISRP fees. Because the highest-grossing commercial SRP users, such as NOLS and Colorado Outward Bound, typically make trips that cross administrative and fee-area boundaries, it can be difficult to parse fees paid specifically for use at Cedar Mesa Special Area. For this reason, the BLM tracked that statistic for three years (2014-2016) in order to establish a baseline, which the BLM projects forward for future years.

Table 4: Cedar Mesa Special Area Permit Fee Revenues

Revenue Source	2014	2015	2016	2017	2018	Average	Average Annual Increase
Private ISRP Overnight ¹	\$17,848	\$19,288	\$23,064	\$25,264	\$26,672	\$22,427	11%
Private ISRP Day Use ²	\$20,411	\$18,561	\$23,360	\$33,323	\$29,014	\$24,934	12%
SRP Fees for Commercial and Organized Group SRPs ³ (3% of gross or \$6/person)	\$18,499	\$19,447	\$19,314	\$19,087*	\$19,087*	\$19,087	1%
ISRP Fees associated with SRPs (Day and Overnight)	\$4,564	\$4,861	\$5,553	\$4,572	\$4,888**	\$4,888	2%

Total SRP Collections	\$61,322	\$62,157	\$71,291	\$82,246	\$79,661	\$71,335	10%
------------------------------	----------	----------	----------	----------	----------	----------	------------

¹Private Overnight ISRP visitors (from Table 3) x \$8.00

²Total Private ISRP revenues from Collections Billing System minus revenue from Private Overnight SRPs

³The Average Annual Increase shows the average difference in revenue between each set of successive years

*The BLM only parsed this data for extensive trips that cross multiple administrative boundaries (typically NOLS and Colorado Outward Bound) from 2014-2016. Numbers for 2017-2018 are projected averages.

**SRP holders have not reported 2018 use at time of writing, so used 4-year average to project 2018 post-use

Table 4 shows the four sources of Cedar Mesa Special Area revenue with some data projected based on averages. These annual revenue figures are in turn used to generate the average year-over-year percentage trend change in revenues.

Priorities of Future Expenditures

Expenditures Critical to Operation

Increased Cedar Mesa fee revenue would also be used to fund additional seasonal park ranger positions for the Kane Gulch Ranger Station in order to provide additional services on Comb Ridge and Butler Wash. Kane Gulch currently relies heavily on volunteers to cover the staffing needs of Cedar Mesa. With the additional staff, rangers would be able to offer better visitor services to the visiting public. The MFO proposes to spend an additional \$14,000 to \$24,000 of the Cedar Mesa fee revenues to fund a seasonal park ranger position for Butler Wash.

Additional revenues will go to maintaining labor and operating cost. Based on the increase in visitation it is estimated that the cost of maintenance will increase in kind.

Future Expenditures for On-going Program Services

Priorities for future expenditures for the Cedar Mesa program include all aspects of maintaining or improving current levels of service for visitors. This includes maintaining a standard of cleanliness at recreation sites, improved opportunities for visitor contact and customer service including information and interpretive services. Increased trail maintenance will also improve visitor access to public use sites. This will promote visitor health and safety, as well as protecting Cedar Mesa's resources and the quality of the recreation experience.

Future Expenditures for Program Improvements

To the degree available and consistent with maintaining an adequate carry-over revenue (fund balance), additional fee revenues would be used toward improving visitor services and maintaining the quality of the recreation experience. Planned visitor service improvements include adding an additional seasonal park ranger that will focus on Butler Wash.

The additional staff will provide the ability to perform necessary program projects in addition to the keeping the ranger station open. This includes extending the hours of the Kane Gulch Ranger Station during the high use season, developing interpretive materials, as well as having a higher backcountry presence to monitor and inventory the high density of cultural, natural, and wilderness study area resources. The staff will also be more available for emergency response on Cedar Mesa.

Directing visitors to sites accessed via the Butler Wash Road within the Cedar Mesa Special Area and associated trailhead development will require site-specific analysis and consultation. Future development of visitor infrastructure such as trailhead kiosks with interpretive and site visitation information will follow that analysis. In the meantime, the MFO proposes increasing in-person educational and interpretive contacts and park ranger patrols to interact with visitors who are already visiting those sites.

Analysis of Recreation Fee Rates

Need to Analyze Recreation Fee Rates

The current fee was established in 1999, when the Consumer Price Index was 166 (Bureau of Labor Statistics 2018). At the end of December 2017, the Consumer Price Index was 245, representing an increase of about 68%. In the same time, the costs of managing the Cedar Mesa Special Area have increased substantially, requiring an analysis of recreation fee rates.

Table 5: Annual Cedar Mesa Special Area Expenditures and Revenues

Fiscal Year	Labor Expenditures	Operations Expenditures		Total Expenditures	Cedar Mesa SRMA Fee Revenues	Appropriated Expenditures (Total)
		Fee Program	Appropriated			
2014	\$331,317	\$9,553	\$1,711	\$342,581	\$61,322	\$281,259
2015	\$223,670	\$23,215	\$1,031	\$247,916	\$62,157	\$185,759
2016	\$228,234	\$31,533	\$14,916	\$274,683	\$71,291	\$203,392
2017 ¹	\$355,979	\$43,316	\$44,215	\$443,510	\$82,246	\$361,264
2018 ¹	\$449,156	\$30,130	\$32,449	\$511,735	\$79,661	\$432,074
5-Year Average	\$317,671	\$27,549	\$18,864	\$364,085	\$71,335	\$292,750

¹The BLM received one-time funds that covered additional labor in FY 2017 and FY 2018

It is critical to maintain a positive carry-over revenue in the Cedar Mesa fee account so that the BLM can provide required services and permit administration, quickly address threats to public health and safety, and allocate some revenue for future investments in Cedar Mesa facilities and services. With average revenues of \$71,335 and operating cost averaging \$364,085, the Cedar Mesa Special Area program is increasingly dependent on annual appropriated funding to sustain the program at its current level of service.

In many budget years, regular non-fee program appropriated funds are not sufficient for seasonal employee labor, on-going operations and supply purchasing, and project work until more than half of the fiscal year has elapsed. A positive carry-over revenue balance, or working capital fund, will provide an important tool for the recreation program to provide program services to Cedar Mesa Special Area users throughout the year. Ideally, the carry-over revenue should be available to cover the labor cost of one seasonal employee (\$15,000) as well as operations costs for one year (approximately \$45,000) for a total of \$61,000.

Fair Market Calculation Method

BLM policy authorizes use of either a cost-recovery or a fair market calculation method to analyze proposed fee rate changes. The MFO is using a fair market comparison to support the need to increase fees at Cedar Mesa Special Area, meaning that fees charged for use at Cedar Mesa Special Area should be commensurate with those charged at similar sites in the region.

The BLM compared current fees at Cedar Mesa Special Area to other similar federal, state, and tribal entities offering single-day use hiking or overnight backcountry backpacking experiences. Some of these fees have a two-part structure, whereby visitors pay both a per-car fee for entry into the larger area, and then pay a subsequent backcountry use fee for overnight trips.

Table 6: Comparable fees charged by other nearby sites

Site Name	Day Use/ Entrance Fee	Overnight/Backcountry Fee
Canyonlands National Park	\$25 per vehicle	\$30 per permit (up to 5 people at Maze, 7 at Island in the Sky and Needles District)
Arches National Park	\$25 per vehicle	N/A (no backcountry overnight use allowed)
Fiery Furnace	Adults - \$6 Children - \$3	N/A (no backcountry overnight use allowed)
Paria Canyon and Buckskin Gulch (Arizona Strip BLM)	\$6 per person \$5 per dog	\$5 per person, per day Average trip = 3.5 days x \$5/person = \$17.50/trip
San Juan River		\$10 - \$30 per person depending on river segment \$10 processing fee for recreation.gov
Sand Flats Recreation Area (Moab BLM)	\$5 per vehicle	N/A (no backcountry overnight use allowed)
Monument Valley, Navajo Nation	\$20 per vehicle (up to 4 people)	\$12 per person per night
Grand Canyon National Park	\$30 per vehicle	\$8 per person per night plus \$10 permit fee
Bryce Canyon National Park	\$30 per vehicle	\$5 per person (over 16 years old)

Under all of these comparable fee structures, a single day of use at any location would typically be \$5 or more per person. Because most National Parks offer a seven-day entry, comparable to the week-long day use pass at Cedar Mesa Special Area, some reduction of fees is available for a multi-day visit in National Parks. Using a typical assumption of 2.5 visitors per vehicle, the Cedar Mesa Special Area’s proposal for a \$10 per-person week-long pass would be comparable to the fee at Canyonlands National Park and slightly less than the fee at Arches, Grand Canyon, and Bryce National Parks. Fees for overnight use are more variable among the comparable locations, but \$15 or more per-person per-trip is typical if factors such as the per-vehicle fees for National Park entry or typical length-of-stay at Paria Canyon are considered.

Anticipated Impacts from Changing and Not Changing Recreation Fee Rates

Anticipated Impacts of Changing Fees

The increase in per person SRP fees within the existing system would affect approximately 17,000 visitors per year. Day use visitors would pay an additional \$3.00 to \$5.00 per person in Cedar Mesa ISRP fees, depending on the type of pass. Based on day use fees in the existing system, each visitor currently pays an average fee of \$2.63. The proposed per person ISRP fee increase would result in each day-use visitor’s average fee roughly doubling to \$5.25. Annual passes make up a very small segment of the passes, as only 100-150 visitors per year take advantage of this pass. Those visitors would pay an additional \$15 per year. The expansion of the Cedar Mesa Special Area permit system to include Butler Wash would affect approximately 20,000 day use visitors annually, although it is likely that there will be substantial overlap between visitors going to Cedar Mesa canyons and to Butler Wash. Using existing

visitation trends in combination with an assumption that approximately half of all visitors to Butler Wash will also visit existing fee sites in Cedar Mesa Special Area, the BLM anticipates that the average annual fee revenues in the next five years would increase approximately 250% as compared to average annual revenues collected in the last five years.

Table 7: Five-year projected ISRP revenues

	Year-Over-Year ¹	Current Average	2019	2020	2021	2022	2023
Private ISRP Overnight ¹	11%	\$22,427	\$55,511	\$61,617	\$68,395	\$75,919	\$84,270
Private ISRP Day Use (single-day, week, annual)	12%	\$24,934	\$76,173	\$85,314	\$95,552	\$107,018	\$119,860
Commercial ISRP (Day and Overnight)	2%	\$4,888	\$5,035	\$5,186	\$5,341	\$5,501	\$5,667
Commercial SRP Fees	1%	\$19,087	\$19,278	\$19,471	\$19,665	\$19,862	\$20,061
Butler Wash Fees	N/A	\$0	\$45,667	\$52,061	\$59,349	\$67,658	\$77,130
All Cedar Mesa Fee Revenues		\$71,336	\$201,664	\$223,649	\$248,302	\$275,958	\$306,988

¹See explanation of Year-Over-Year change in Table 4. Year-Over-Year from Table 4 was used to project revenues

²Assumes roughly half of visitors to Butler Wash sites will have paid for day use at Cedar Mesa canyons

The proposed fee increase would bring Cedar Mesa’s carry-over revenues to a level that would reduce dependence on annual appropriated funds to cover program expenses and provide additional program stability while increasing visitor services and improving protection of resources.

Benefits to Recreational Users

If the ISRP fees were raised current services and facility maintenance standards of the Cedar Mesa/Kane Gulch Ranger Station, services would continue uninterrupted for recreational users. The modified fees would help offset the rising cost of maintaining visitor services on Cedar Mesa. The additional staff that would be added with the fee increase will increase recreational users’ safety by adding backcountry and front country patrols, providing assistance with Search and Rescue, and add value to their trip by providing interpretive contacts and by increasing awareness in the areas of cultural and natural resource protections.

The increase in fee revenue will also go towards projects that mitigate the visitor impacts to cultural and natural resources, thereby preserving the current world class recreational experience.

Benefits to the Local Economy

Private leisure and hospitality sector jobs constituted almost 25 percent of total private employment in San Juan County in 2016, providing a vital segment of the local economy (Lever, 2018, p. 21). The Cedar Mesa program provides a high quality cultural and recreational experience that draws over 17,000 recreational users to San Juan County annually. These visitors purchase food, fuel, and lodging in the communities of Blanding, Bluff, Monticello, and Mexican Hat.

It is important to the local economy for the Cedar Mesa program to have the financial ability to maintain and improve the current services and facilities associated with commercial and private recreation on

Cedar Mesa as well as protecting the backcountry recreation experience. By maintaining the current services and facilities the BLM would help restore the trust in the local communities by being a good neighbor.

Table 8: Projected Expenditures and Revenue

Fiscal Year	Labor Expenditures¹	Operations Expenditures²	Total Expenditures	Cedar Mesa SRMA Fee Revenues	Appropriated Funds Expenditures
2019	\$515,020	\$52,151	\$567,171	\$201,664	\$365,507
2020	\$525,320	\$55,280	\$580,600	\$223,649	\$356,951
2021	\$535,827	\$58,596	\$594,423	\$248,302	\$346,121
2022	\$546,543	\$62,112	\$608,655	\$275,958	\$332,697
2023	\$557,474	\$65,839	\$623,313	\$306,988	\$316,325
5-Year Average	\$541,468	\$58,795	\$600,263	\$251,312	\$348,951

¹Labor figure assumes adding one seasonal GS-05 Park Ranger and a 2% annual cost of living increase each year

²Operations based on previous 5-year average with three additional toilets and 3% annual increase

Anticipated Results of Not Modifying the Current Fee Rates

A failure to increase the fees would mean that the Cedar Mesa SRP program would continue to rely heavily on appropriated funds to support recreation opportunities. Should appropriated funds be decreased or fail to keep pace with increasing maintenance and operations costs, a failure to maintain current visitor services could have significant negative impacts on recreational users, the local economy, cultural sites, and the environment.

Negative Impacts to Recreational Users

A shrinking balance to the Cedar Mesa fee account would result in a decrease of essential staffing and deterioration in infrastructure upkeep and timely facility maintenance. Customer service, visitor safety, and resource protection provided through visitor contacts with BLM park rangers would also decrease with additional visitation and further strain on staffing at the Kane Gulch Ranger Station. The result would be less compliance with group size limits and resource protection stipulations, resulting in overcrowding and resource damage. Cultural resources are the main attraction to Cedar Mesa, both day use and backcountry. The loss of or damage to cultural resources would also have a negative impact on the recreational user’s experience and visitor satisfaction.

Negative Impacts to Local Economy

If fees are not modified, the BLM could lose the financial ability to manage the Cedar Mesa program at its current standards and maintain the quality of the recreational experience. Not raising the fee commensurate with staffing needs could lead to erosion of both visitor services and facility maintenance, as well as diminished ability to protect cultural resources. The resulting deferred maintenance backlog and decrease in staff visibility would detract from the visitors’ overall experience. Potential degradation of archeological sites, the main attraction to this area, would result in less visitation as users look elsewhere for the type of experience that Cedar Mesa and BENM Shash Jaa Unit currently provide. The loss of these multi-day visitors would mean a forfeiture of revenue to the local economy. That impact in these relatively small communities would be significant and could lead to a loss of trust with the BLM in the local communities.

Public Outreach

Prior to modifying fees, the MFO is conducting the following outreach efforts to notify the public of its opportunity to review and comment on the proposal to increase the ISRP fees on Cedar Mesa, add Butler Wash to the fee system, and manage the Moonhouse site daily allocation year-round:

- Posting the *Draft Business Plan for Cedar Mesa Fiscal Year 2019* on the BLM Utah website
- Issuing a news release to statewide print and broadcast media
- Posting links to the *Draft Business Plan for Cedar Mesa Fiscal Year 2019* on the BLM Utah Facebook and Twitter accounts.

At the conclusion of the 30-day public comment period, the MFO will present the fee increase and additions to the Utah Resource Advisory Council (RAC) for its formal review. The Utah RAC is a 15 member advisory panel that provides advice and recommendations to the BLM and U.S. Forest Service on proposed modifications to their recreation fee programs in Utah. The Federal Lands Recreation Enhancement Act mandates that the appropriate Recreation RAC reviews all BLM recreation fee proposals prior to approval. Comment from both the public at large and the Utah Recreation RAC will be considered prior to approval of an increase in fees and site additions.

References

BLM. (November 2014). *H-2930-1 Recreation Permit and Fee Administration Handbook*. Bureau of Land Management.

Bureau of Labor Statistics. 2018. *Consumer Price Index Historical Table, U.S. City Average*.

Jew, Jonny. (August 2017). *Interim Monticello Field Office Visitor Use Report 2017*. Monticello, UT: Bureau of Land Management Monticello Field Office,

Leaver, Jennifer. (May 2018). *The State of Utah's Travel and Tourism Industry*. Thomas S. Monson Center I 411 E. South Temple Street, Salt Lake City, UT: University of Utah Ken C. Gardner Policy Institute David Eccles School of Business.

Russell, Jenifer Hoger. (2012). *Kane Gulch Ranger Station Visitor Survey FY12, Report #KAGU612*. Moscow, Idaho. University of Idaho Park Studies Unit.