

I believe the Ft. Thompson site is not appropriate for a recreational campground or an RV park. The stated reason in the Camping Feasibility Study for Deschutes County to provide camping facilities is that countywide recreational demand/use continues to grow and we do not have enough camping facilities to allow visitors to fully partake of our recreational opportunities. However, the ECONW report's support of an "urgent" need for new campgrounds is extremely weak for campgrounds and is nonexistent for RV parks. And the study does not provide support for a specific need for a camping facility at any of the three county properties.

Before addressing recreational camping issues, I would like to mention the elephant in the room. It is somewhat difficult to evaluate the need for recreational oriented camping facilities when it is not really clear what the actual intent of the Commission is. It appears that the commission might be trying to deal with non-recreational housing and homeless issues. The Project Understanding section of the March 29, 2023 contract between Deschutes County and ECONorthwest says: "...*An estimated four million overnight visitors come to Central Oregon annually and this intensity of use strains the already limited short- and long-term housing supply. To combat short- and long-term housing needs within Deschutes County, Deschutes County has identified three sites, on county-owned land to evaluate the feasibility of developing multi-benefit campgrounds...(underlining mine)*" The term multi-benefit campground is never defined, but based on how terms are used in the report, could easily be non-recreational housing.

The second paragraph of the report's introduction says: "...*Furthermore, affordable RV and tent campgrounds could help address the short-term housing needs of seasonal workers in recreational areas during peak seasons or provide support for the growing demand to accommodate the unhoused or homeless who often rely on RV parks as an affordable housing option....*" This emotional editorial may or may not even be true, but it has no relevance to recreational facilities. If the primary county problem is needing camping facilities to support recreation users, then saying the necessary facilities might be used for other purposes is wrong

Additionally, Commissioner Chang has muddied the waters further by publicly saying the facility could be used for homeless people needing camp spots. In the May 4, 2024 Bend Bulletin he said: "...*And, you know, we have so much dispersed camping on our federal lands right outside the city of Bend. I think a developed campground in a nice spot that has plumbing, toilets, water, maybe even electrical hook-ups, wifi - I think it has a role to play in drawing some of the van life component out of our federal lands. Then it would make it easier to know where our homeless folks are and, you know, to do outreach and support them or send law enforcement to work with them as necessary.*" At the Commission's annual retreat in January, 2024 which included a discussion of the Campground Study, Commissioner DeBone said the facility could be useful for seasonal workers. So, it is very reasonable to wonder what the Commission is actually trying to do.

For the rest of this document I will assume that the county is pursuing a truly recreation supporting camping facility, and I will show why it has not made its case that such a facility is needed.

Before I support my assertions, I would like to address an imprecision and fuzziness of terms. The campground study never defines campgrounds and switches between terms a little too

easily. I am defining the terms to match general public perceptions. I will use the term camping facility to cover the full range of camping situations. The term campgrounds will generally mean: publicly run facilities, for recreational purposes, near or at recreational opportunities, and for short term use. Sites may be for tents or RVs, but campgrounds, except for some state parks, rarely have full hookups and provide limited services. The term RV park will mean: generally a private/commercial facility, catering mostly to RVs, with transient and longer term stays, and market rate fees and support services.

Let's start the analysis of the report with Section 2 Purpose and Need – Campground Demand. The first argument supporting too much demand is that the county's population is growing and is expected to continue to grow. But there is no direct link to how increased population means we need more camping facilities.

Demand argument 2 is that the county transient room tax collections are rising. Again, no link or explanation of why this increase of lodging revenues means we need more camping facilities.

Demand argument 3 is based on a report ECONW did for the Deschutes National Forest service that projects a 33% visitation increase in the forest from 2021 to 2040. This is for everything from hiking, to skiing, to boating, fishing, hunting, mountain biking, camping, etc. The report for the forest service states most of the listed activities will grow faster than camping. It does not say if there is a deficiency of camping opportunities, other activities are more popular, or, just as possible, people camping are partaking of an increased number of additional activities. However, the report's executive summary makes a leap and concludes: "...While camping has grown steadily, other activities like downhill skiing, hiking, and nature exploration have outpaced it. This surge in interest underscores the need for expanded camping and recreational facilities...(underlining mine)." If we need more camping opportunities in the Deschutes Forest to keep the activities balanced, shouldn't we be working with the USFS to add more camping in the forest? There is nothing in the report stating how the purported lack of campground supply in the Deschutes Forest can be alleviated by a RV park on the north side of the Bend city limits. Finally, the report to the Forest Service did say that most of the expected activity growth would be by locals, not outsiders, which further undermines the contention we need a camping facility at Ft. Thompson.

Demand argument 4 is never spelled out but is quite publicized. The report says twice in the Introduction that demand for camping is so high that the visitors have to cut short their stays. "...However, Deschutes County faces a challenge as it grapples with a shortage of short-term lodging capacity that caters to outdoor recreationists, preventing visitors from extending their stays... A scarcity of camping opportunities in Central Oregon, including for recreational vehicles (RV), not only reduces total visitation ..." These emotional statements are not backed up in any way in the report. There are no numbers or documentation of people having to cut short their recreational trips to Deschutes County. During peak summer there are probably camp facilities where people can not stay as long as they would like. This is true for peak season at recreation facilities world wide, and is not a great support of demand being way above supply.

Demand argument 5 again is mentioned in the report's introduction. The purported "scarcity" of camping opportunities "...contributes to increased dispersed camping in undeveloped forestland

and along roads...” There is nothing in the report supporting this dramatic claim. If campgrounds and RV parks would serve as a substitute for dispersed forest camping, are they doing that function now? Where is the survey of dispersed campers asking if they would use campgrounds and market rate RV parks? Where is the documentation?

Let’s move on to supply discussions. Section 3 covers Current Campground Operations in Deschutes County (Supply), although much of the section really deals with demand and usage. But let’s start with the overall supply issue. The second paragraph of the introduction states: “...*While visitation and population have both rapidly grown over recent decades, there has been no corresponding increase in camping capacity...* (underline mine).” This statement seems to be based on nothing. There is no inventory of the current total campground facilities in the county – the number of campgrounds or the number of sites. And there are no numbers for campgrounds or sites twenty plus years ago to compare to.

Section 3 starts with the UFS campgrounds in the Deschutes National Forest. Utilization rates were available for 57 of 81 identified campgrounds. It is not clear what the utilization rate means, if it is campsite occupancy rates or something else. Twenty three of the 81 campgrounds had utilization rates over 60 percent. Implied is this is a high rate showing the need for more campgrounds. But, it just as easily can mean that only 23 of 81 campgrounds are relatively busy. Interestingly, the 23 listed campgrounds with high utilization rates are all on lakes, rivers, or creeks – places with great amenities.

The report next talks about RV parks in the county. It states there are 14 of them and lists 12 in its chart, with one having no site or pricing info. Occupancy information was only available from one site, the Expo Center RV park. There was NO information on the types of customers, the mix of short and long term stays, what the focus of each park is, or anything that might show how the RV parks supported recreational users in Deschutes county. In the chart listing the 12 parks, the four of the six that show a monthly pricing range, did not even show a daily price range, suggesting they are very much not oriented towards short term or recreational users.

Since we are talking about RV park supply, and the report states that supply is not growing, it would have been informative to have a definitive number of the current existing RV park sites in the county. And it would have been just as useful to have this inventory from 20 years ago to compare numbers. As is, we have absolutely no idea if the amount of RV Park sites has stagnated or grown over time. Plus, the report does not mention the 176 site Bend RV Park being built right now on the south side of Bend, which clearly contradicts the stagnation narrative. At first blush, and probably second blush, this project would seem to address any purported need for new RV camping facilities in the county. It is also being done without governmental support.

The report moves on to briefly talk about the three state parks in the county. The two with reserved camping spots reported occupancy rates higher than the Oregon state park average. Unstated, but implied, is there is an overdemand at our two state parks. There are a broad range of state parks in Oregon, and our two high amenity, accessible locations should be above the overall state average. You would expect Ft. Stephens and Honeyman state parks on the coast to

be above average and you would expect the isolated Cottonwood Canyon near Wasco to be under the state average.

In the introduction, and on a slide used during the ECONW report presentation to the commission, it states: “Deschutes County has not introduced a new county-run campground in over four decades.” This is an incredibly disingenuous statement. It sounds like total government malfeasance and clearly bolsters the sense of some kind of campground facility shortage. The not stated truth is that Deschutes County does not have a parks department and is consciously not in the park or recreation business. The County made a decision in the past to leave these functions to federal agencies, the state, cities, and especially Bend Parks and Recreation.

Our realistic camping supply is much larger than the report alludes to. The report several times shifts from visitor or recreation numbers in the county to those of an undefined Central Oregon. The report’s introduction says: “*A scarcity of camping opportunities in Central Oregon, including for recreational vehicles ...*(my underlining)” Since the report is stating that Central Oregon has a scarcity of camping opportunities (which it never backs up), it seems like the report’s supply analysis should have included more camping facilities beyond the county border - from Lake Billy Chinook, to the Crooked River, to Santiam Hwy, and more. All of these areas are within Central Oregon.

The report attempted to make a case for needing more campgrounds in the county. The data focused only on the Deschutes National Forest, but it did not even make a case for more campgrounds there. The report certainly did not make any case for needing more RV parks. What little information actually provided made a good case that there is no need for the county to develop an RV park. Let’s look at this information.

This sentence on page 7 precedes Exhibit 8 which attempts to show Deschutes Forest campground occupancy rates: “...*While the data available for comparing campground and RV park occupancy rates is limited,...*” The reality seems to be there is NO data comparing the USFS campground occupancy rates to RV parks. So, the whole point of using the USFS campground’s utilization rates to examine RV park demand is meaningless. Especially comparing the cascade mountains against the Hwy 97 corridor.

The report states it only has RV Park occupancy rates from one park. The one park is the Expo Center RV Park, which is very unique in that it is intertwined and accessory to the Expo Center. In general, it seems a little bold to make any claims of a shortage based on one facility. When looking at Exhibit 19 below showing hotel and RV park occupancy rates, non-recreational parks are represented by the Expo RV park. Recreational RV parks are represented by two state parks (which are different than RV parks).

**Exhibit 19. Deschutes County Hotel and RV Occupancy Rates by Month Since January 2021
Recalibrated to the Natural Occupancy Rate for the County**

Source: ECONorthwest analysis using STR Global, Oregon State Parks, and Deschutes County data.

Month	Deschutes County hotels since Jan. 2021	County hotels at the NOR	Non-recreational RV at NOR	Recreational RV at NOR
Jan	44.4%	42.0%	29.8%	27.8%
Feb	50.6%	47.8%	31.0%	31.1%
Mar	59.2%	55.9%	37.3%	51.2%
Apr	60.7%	57.3%	47.7%	66.7%
May	64.6%	61.0%	59.0%	77.6%
Jun	75.9%	71.7%	71.5%	95.1%
Jul	79.2%	74.8%	77.4%	88.3%
Aug	75.6%	71.4%	64.0%	83.9%
Sep	72.7%	68.6%	69.4%	74.7%
Oct	64.7%	61.1%	53.9%	76.6%
Nov	50.5%	47.7%	32.6%	49.2%
Dec	47.1%	44.5%	31.7%	33.9%
Annual	62.1%	58.7%	50.4%	63.0%

Looking at the numbers for the lone RV park and the two state parks reveals something kind of interesting; there doesn't seem to be an overwhelming, yearlong shortage of RV camp spots at our probably most popular facilities. The three summer months average for the Expo RV park is 71%, and the yearly average is only 50%. This for a facility that specifically supplies lodging options for Expo Center events. We have absolutely no idea of how representational those numbers are for the other RV parks in the county. The two state parks are in the 80% range mid-summer, but the yearly occupancy average is 63%. This peak, high demand pattern is true for every nice, accessible state and national park in the country. Possibly the County should be talking to the State Parks about expansion in the parks, not the County building its own facility. But overall, this hardly seems like occupancy numbers crying out for a governmental fix.

The underlying process flaw in the Commission's instructions is that the County is not asking what is the best solution to a specific problem (which it is having trouble documenting). If the County really determined that a lack of campgrounds or RV parks was hurting our economy and hurting our residents, how would we try to address the problem? Could we find better, more cost effective solutions? Would we even consider any of the three sites if the County did not own them?

Is this even a problem the County should address? When hotel demand exceeds supply, as the report states is the current situation, should the County be providing hotels? If the County really thought we needed more camping opportunities, shouldn't it be advocating to the USFS, the BLM and the State Parks Dept, to increase existing campground sizes and to add new ones? And if the County really thinks we need more RV parks, shouldn't it be doing the same things that cities and counties do when they want to encourage specific private sector uses in desired locations?

One last area of discussion. A concept mentioned multiple times is the county park with some form of accessory camp facility. A county park will be very much needed to help circumvent some land use restrictions, as well as for raising grant monies. The whole focus of the ECONW study has been on camping. There is NO analysis of a park and recreational deficiency anywhere in the county, and the same for needing a county park along Hwy 97 to fix this deficiency. There has not even been any public discussion by the Commission to get the County into the park business. This seems like a weighty decision that should be very transparent, open, and well supported by the citizenry.

I am not going to speak to the site assessments as I really do not think a case has been made to use the County owned sites for any type of camping. However, especially on the Ft. Thompson site, I think the report's list of constraints is much more substantial than the Commission wants to acknowledge. And I am very sure the public response to the proposal will be much more negative and sustained than the Commission predicts.