

Secretary of State  
**STATEMENT OF NEED AND FISCAL IMPACT**  
A Notice of Proposed Rulemaking Hearing accompanies this form.

**FILED**  
7-14-15 3:36 PM  
ARCHIVES DIVISION  
SECRETARY OF STATE

Parks and Recreation Department  
Agency and Division

736  
Administrative Rules Chapter Number

Amend reservation process

Rule Caption (Not more than 15 words that reasonably identifies the subject matter of the agency's intended action.)

In the Matter of:

Revisions to OAR 736 Division 15 Rates

**Statutory Authority:**

ORS 390.124

**Other Authority:**

**Statutes Implemented:**

ORS 390.111; ORS 390.121; ORS 390.124

**Need for the Rule(s):**

The rule change is needed to more closely reflect current cancellation practices, reservation window, and department terminology; to create a more lenient cancellation and change policy for deluxe cabins and yurts and horse camps; and to better manage large groups.

**Documents Relied Upon, and where they are available:**

Analysis of reservation data, which is available by request from [OPRD.Publiccomment@oregon.gov](mailto:OPRD.Publiccomment@oregon.gov).

**Fiscal and Economic Impact:**

1) **Reservation Window.** Changing the reservation window from two days to one is a customer service improvement that allows campers to make last-minute decisions and be guaranteed a site. This is a feature many customers have asked for, but it can have a small fiscal impact on a small segment of our population - the walk-in customers during our less busy months. If the new rule is adopted, walk-in customers will only be guaranteed their site for one night. If park employees are not available to extend their stays, customers will need to make a reservation online or by calling the call center. Reservations carry an \$8 fee; however, this is not a new fee. Current customers have been paying this fee for years.

To minimize the fiscal impact on customers, the department is committed to implementing operational changes to allow more flexibility for walk-up customers at times when staffing levels are low.

This rule change will have a minimal impact on customers during the busiest camping times, as few sites are available for walk-up customers.

2) **Cancellation Process.** The proposed cancellation process changes allow customers to cancel their reservations on the web without having to e-mail or call the call center. If they want to call, they can process all cancellations via the call center, except for when canceling a reservation on their arrival day. These rule changes have no fiscal impact on the customer.

3) **Facilities.** Changing the cancellation and change windows for deluxe cabins and yurts, and horse camps from one month to 3 days has a positive fiscal impact on customers. Currently, if customers change or cancel their reservations less than one month before arrival, they lose their first night's fee. The new rule will allow customers more time to change or cancel their reservations - 3 days before arrival, which is the current standard for individual campsites, rustic cabins and yurts, tepees, camper wagons, and boat moorage. The new rule will save customers their first night's use fee for most changes and cancellations for deluxe cabins, yurts and horse camps. The nightly use fees for deluxe cabins, yurts and horse camps range from \$17 to \$79. We anticipate total savings to customers will be approximately \$10,000 per year, based on the last two years of applicable camping data.

4) **Groups:** Most rule changes that affect groups do not have a fiscal impact. However, one change will affect all customers who currently camp as a group. The proposed rule removes the \$8 reservation fee waiver. If the rule amendment is adopted, customers will pay an \$8 reservation fee per site, consistent with the fees paid by all other reservation customers. Some customers camp as a group more than once a year, so they would pay the fee for every reservation they make. Overall, there were 486 groups that camped in the last two years

who received more than \$66,000 in fee waivers.

Another proposed change eliminates the cancellation fee for group reservations. Currently, group sites that are canceled incur an \$8 cancellation fee. If users pay the \$8 reservation fee, they will no longer be charged \$8 to cancel their reservations.

These program changes will decrease department costs by eliminating the fee waiver, and reducing staff time to process group reservations in the call center and in the field.

5) Housekeeping. Some of the rule changes are editorial in nature and thus have no fiscal impact.

**Statement of Cost of Compliance:**

**1. Impact on state agencies, units of local government and the public (ORS 183.335(2)(b)(E)):**

a. State agencies: There is no apparent impact on state agencies as this rule affects OPRD and the individuals who use its facilities.

b. Units of local government: There is no apparent impact on local government as this rule affects OPRD and the individuals who use its facilities.

c. The public: The proposed rules do not have a cost of compliance. However, group users will have to pay \$8 per site if the rule is adopted, while users of deluxe cabins and yurts, horse camps and group camps will no longer forfeit their first night's use fees if they cancel between a month and three days before arrival. The nightly use fees for deluxe cabins and yurts and horse camps \$17 to \$79.

**2. Cost of compliance effect on small business (ORS 183.336):**

**a. Estimate the number of small business and types of businesses and industries with small businesses subject to the rule:**

Camping reservations are generally made in the name of individuals rather than business. Therefore, it is difficult to estimate how many small businesses would be impacted by this rule. It is possible that some small businesses involved in tourism use our campgrounds. If they register as a group and currently receive the reservation fee waiver, they would be affected by the removal of that waiver and would need to pay \$8 per site they reserve.

**b. Projected reporting, recordkeeping and other administrative activities required for compliance, including costs of professional services:**

There are no costs of compliance associated with reporting, record keeping or other administrative activities.

**c. Equipment, supplies, labor and increased administration required for compliance:**

There are no costs of compliance that involve equipment, supplies, labor or increased administration.

**How were small businesses involved in the development of this rule?**

This rule does not affect small businesses directly. Rather, it affects OPRD and its users. Groups were invited to participate in open house meeting to discuss the current program. The agency held five open house meetings around the state. The locations were selected based on the addresses of the group leaders who camped in our campgrounds in the last two years. The meetings were well attended by church groups, youth groups, and family reunions and one business owner.

**Administrative Rule Advisory Committee consulted?: No**

**If not, why?:**

Most changes represent customer service improvements and financial benefits, some of which have been eagerly and seamlessly adopted by customers. Convening an advisory committee for these changes seemed unnecessary. Furthermore, the agency wanted to focus its attention on group users, as they are the customers who would be impacted fiscally by the proposed rule changes. An administrative rules advisory committee was not consulted because the agency held five meetings with group users. The meetings were well attended and provided a good perspective for the department to move forward.

The public will be able to comment in writing until August 28th or in person at five public hearings scheduled in August.

08-28-2015 5:00 p.m.	Claudia Ciobanu	claudia.i.ciobanu@oregon.gov
Last Day (m/d/yyyy) and Time for public comment	Printed Name	Email Address