

MARKET RENT SURVEY



Shadehill Reservoir Cabin/Trailer Sites Perkins County, South Dakota

SUBMITTED TO

Steve Murphy, Review Appraiser
Office of Valuation Services
1340 Financial Boulevard
Reno, NV 89502

IVIS: PROJECT / CASE NUMBERS

R14028 / 00065193

EFFECTIVE DATE OF OPINION

August 24, 2015

DATE OF REPORT

August 27, 2015

SUBMITTED BY

Charles W. Laflamme, MAI
Adam Bradshaw
Office of Valuation Services
2180 Harvard Street, Suite 380
Sacramento, CA 95815



United States Department of the Interior
Office of Valuation Services

2180 Harvard, Suite 380
Sacramento CA 95815

August 28, 2015

Steve Murphy, Review Appraiser
Office of Valuation Services
1340 Financial Boulevard
Reno, NV 89502

Re: Permit Fee Survey
Shadehill Reservoir Cabin/Trailer Sites
Perkins County, SD

Dear Mr. Murphy:

Per the request of the Bureau of Reclamation (Reclamation) via the Office of Valuation Services, we have undertaken a **market rent survey**.

The **purpose** of this survey was to gather sufficient information to opine a market rent conclusion for Reclamation's cabin/trailer sites as identified and located along Shadehill Reservoir in Perkins County, South Dakota. The **intended use** is to assist Reclamation in establishing the annual fee for use in issuing new permits for the cabin/trailer sites. As per the license/permit the sites identified as *cabin/trailer sites* are contracted for terms not to exceed five years and the permit fees are paid annually by tenants. The cabin/trailer sites are limited to seasonal use (April to November). Both cabin site permits and trailer site permits prohibit permanent residence.

The **client** is the Office of Valuation Services and the **intended user** is the Bureau of Reclamation. There are no other authorized users of this report.

This report conforms to the Uniform Standards of Professional Appraisal Practice (USPAP) as well as the Code of Professional Ethics and Standards of Professional Practice of the Appraisal Institute. The analyses, and conclusions, are subject to the assumptions and limiting conditions described in this report. We inspected the subject property on October 7, 2014. The effective date of value is August 24, 2015.

We have concluded that the current market rent for a typical trailer/cabin site surrounding Shadehill Reservoir and better described herein is \$2,100 per year.

Respectfully submitted,

Adam Bradshaw

Charles W. Laflamme, MAI

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SUMMARY OF SALIENT FACTS & CONCLUSION

IVIS Number	R14028
Agency Case ID	00065193
Property Location	T 8 S, R 6 E, SEC 20, & T 9 S, R 6 E, SEC 11 & 33, BHM
County	Perkins County, SD
Assessor’s Parcel Number	No APN assigned
Property Owner	USA, administrated by Reclamation
Property Description	The Shadehill Reservoir Market Survey focuses on 47 cabin/trailer sites located on Reclamation land surrounding Shadehill Reservoir. The sites are all permitted, with terms not to exceed, 5-years. There are four separate areas in which the sites are located. Of the 47 sites, four sit at the far north end of the reservoir, 17 are located roughly a mile southeast of the latter, 11 are located in an area on the west side of the reservoir, and 15 are located off of South Cabin Road on the east side of the reservoir.
Purpose of the Report	The purpose of this survey was to gather market information as to rental amounts in RV parks and/or other housing options similar to the trailer/cabin sites at Shadehill Reservoir for the purpose of estimating an annual rental for the typical cabin/trailer sites.
Client	The client is the U.S. Department of the Interior, Office of Valuation Services.
Intended User	The intended user is the Bureau of Reclamation on behalf of the United States of America.
Intended Use	The intended use is to assist Reclamation in establishing a current annual permit fee for each of the 47 sites surrounding the reservoir.
Effective Date of Value	August 24, 2015
Date of Report	August 27, 2015
Extraordinary Assumptions	None
Hypothetical Conditions	None
Base Annual Market Permit Fee for typical site	\$2,100

INTRODUCTION

IDENTIFICATION OF THE PROPERTY

The cabin/trailer sites that surround Shadehill Reservoir, located in Perkins County, South Dakota, comprise the subject of this report. There are 47 trailer/cabin sites found in four different locations around the reservoir. The sites are available for seasonal occupancy via a five year permit from the South Dakota Department of Game, Fish & Parks (SD DGFP), acting for the Bureau of Reclamation. The permit calls for an annual fee to be paid for use of the individual sites.

PURPOSE OF THE SURVEY

The purpose of this survey was to collect sufficient information to estimate an annual rent for the typical cabin/trailer sites located along Shadehill Reservoir as of the effective date of our analysis and under the terms of permit given to us by the client.

INTENDED USE OF THE APPRAISAL

The opinion of the typical annual market rent is meant for use by Reclamation as a basis for their determination of permit fees for the 47 individual cabin/trailer sites.

CLIENT IDENTIFICATION

The client is the Office of Valuation Services.

INTENDED USER(S)

The intended user is the Bureau of Reclamation on behalf of the United States of America.

EFFECTIVE DATE OF VALUE

The Shadehill Reservoir was physically inspected by the appraisers in October 2014. The effective date of the opinion is August 24, 2015, which was the date when the analysis was completed. The date of the report is August 27, 2015, the date that the report was published.

LEGAL DESCRIPTION

Not applicable

INTEREST APPRAISED

Annual rental for Use Permit

OWNER OF RECORD

The owner of record is the United States of America; the fee simple interest is administered by the Bureau of Reclamation. The 47 permitted trailer/cabin site occupants hold permittee owner interests in their respective sites.

DEFINITIONS

Market Rent

The Office of Valuation Services (OVS) has opined that the appropriate definition for use in market rental determinations for rights-of-way (ROWs) is the definition of market rent as found in the Dictionary of Real Estate Appraisal as follows:

The most probable rent that a property should bring in a competitive and open market reflecting all conditions and restrictions of the specified lease agreement including term, rental adjustment and revaluation, permitted uses, use restrictions, and expense obligations; the lessee and lessor each acting prudently and knowledgeably, and assuming consummation of the lease contract as of a specified date.

EXTRAORDINARY ASSUMPTIONS AND/OR LIMITING CONDITIONS

None

HYPOTHETICAL CONDITION

None

JURISDICTIONAL EXCEPTION

None

ASSIGNMENT CONDITIONS

The report is expressly subject to the following assumptions and/or limiting conditions:

- In this analysis, we assume conditions in which the property would be available for lease under prevailing market conditions.
- We assume the cabin/trailer sites are under responsible ownership and competent management. Furthermore, there are no hidden or undisclosed conditions of the land or of the improvements that would affect market rent.
- We assume that the cabin/trailer sites are not affected by any adverse environmental conditions that would have an impact on the market rent analysis. Adverse environmental conditions unknown to us could impact the final rent conclusion.
- The conclusions stated in the appraisal apply only as of the date of valuation and no representation is made as to the effect of subsequent events.
- Although we conducted cursory inspection of the cabin/trailer sites, we did not conduct a formal survey of the property and assume no responsibility in connection with such matters. The spatial data, including sketches and/or surveys, have been supplied by Reclamation and, while they are assumed to be correct, are meant only as visual aids within the context of this report.
- We are not responsible for considerations requiring expertise in other fields, including but not limited to: legal descriptions and other legal matters, geologic considerations such as soils and seismic stability, engineering, or environmental and toxic contaminants.
- We assume the property is in compliance with all applicable building, environmental, zoning, and other federal, state and local laws, regulations, and codes, unless otherwise noted in this appraisal.
- All facts set forth in this report are true and accurate to the best of our knowledge. However, it should be noted that the appraisal process inherently requires information from a wide variety of sources. The appraiser has relied on information provided by other individuals and in good faith believes that information to be reliable. We do not accept responsibility for erroneous information provided by others.
- Our analyses, opinions and conclusions are limited by the Scope of Work as defined herein.
- We are not qualified to detect hazardous or toxic materials. Such determination would require investigation by a qualified expert. Unless so stated, our value conclusion assumes there are no hazardous or toxic materials on or in (subsurface) the appraised property and/or adjacent properties that would have a negative impact on the value of the subject property.
- Neither all nor any part of this report, or copy thereof, shall be used for any purpose by anyone but the client and intended users specified in the report without my written consent. This report was prepared for the client's use at their sole discretion within the framework of the intended use stated in this report. Its use for any other purpose or use by any party not identified as an intended user of this report is beyond the scope of work of this assignment.

CERTIFICATION

We certify that, to the best of our knowledge and belief:

- the statements of fact contained in this report are true and correct;
- the reported analyses, opinions and conclusions are limited only by the reported assumptions and limiting conditions, and are our personal, impartial, and unbiased professional analyses, opinions, and conclusions;
- we have no present or prospective interest in the appraised property and no personal interest with respect to the parties involved;
- we have performed no services, as appraisers or in any other capacity, regarding the property that is the subject of this report within the three-year period immediately preceding acceptance of this assignment;
- we have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment;
- our compensation or status with the Department of the Interior is not contingent on an action or event resulting from the analyses, opinions, or conclusions in the report or from its use;
- our compensation or status with the Department of the Interior for completing this assignment is not contingent upon the development or reporting of predetermined assignment results or assignment results that favors the Department of the Interior or any other governmental agency, the attainment of a stipulated result, or this occurrence of a subsequent event directly related to the intended use of this report;
- our analyses, opinions and conclusions were developed, and the report was prepared in conformity with the Uniform Standards of Professional Appraisal Practice (USPAP);
- Adam Bradshaw and Charles Laflamme personally inspected the subject property on October 7, 2014;
- no one provided significant appraisal assistance to us in the completion of this assignment;
- the use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives;
- as of the date of this review report, I, Charles LaFlamme, have completed the requirements of the continuing education program for Designated Members of the Appraisal Institute;
- the report analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the requirements of the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute;
- Charles W. Laflamme is a State Certified General Real Estate Appraiser licensed by the State of California (License No. AG002325);
- Adam Bradshaw is a State of Georgia Registered Real Property Appraiser (No. 355805).

Charles W. Laflamme, MAI

Adam Bradshaw

PERMIT SYNOPSIS

This report involves the estimation of an appropriate fee to be paid on an annual basis for a site at Shadehill Reservoir. The fee is subject to the terms of a permit that is to be issued by the SD DGFP. A cabin permit issued by SD DGFP with an effective date of January 1, 2013—not set to expire until December 31, 2017—was provided to the appraisers. This served as the basis for this analysis. The rent specified on the permit was \$420 per year.

The basic terms/conditions of a permit upon which this analysis is based is as follows:

Issuer - South Dakota Department of Game, Fish and Parks (under MOU dated October 3, 2000 between SD DGFP and the Bureau of Reclamation wherein SD DGFP administers the site program for Reclamation)

Permittee – to be identified

Term of Permit – Five years beginning January 1, 20__ to December 31, 20__, unless terminated sooner. If on or before the expiration of the permit the SD DGFP determines to permit a continuance of the existing use under similar or new conditions, and the permittee has fully complied with the conditions of this Permit, the permittee may be considered the preferred applicant for a new permit.

Purpose of Permit – Maintaining a seasonal cabin/trailer for personal use. This permit is not for permanent residence, and is not intended in any way to cause development that will increase local government or state expenditures.

General - The Permittee rights under the permit are limited, are not guaranteed in perpetuity, and may be cancelable at any time to meet the needs of the US and SD DGFP. Permittee has only those rights and privileges expressly provided for in this permit. Cabin/trailers and other private property are permitted on public lands in designated areas. The cabin/trailer site program may be wholly or partially discontinued in the future if the Bureau of Reclamation or SD DGFP determines that the public need for the area has grown to the point where continued use of private cabin/trailer use is no longer in the public interest. In such an event, the Permittee agrees to vacate their

cabin/trailer site and remove their cabin/trailer or other improvements at no cost to the SD DGFP.

Description of Authorized Use of Land Permitted - The cabin/trailer may be occupied continuously from May 1st through October 31st of each year covered by this permit. Occupancy of the cabin/trailer sites between 1 November and 30 April is limited to no more than 10 occupied days per month. Permission for occupancy during the time between 1 November and 30 April maybe granted for approved construction or maintenance.

Permit Rates and Administrative Fees – The permittee will pay to the SD DGFP \$_____ per year and the fee maybe adjusted by the Department at the beginning of the start of each calendar year. The Department will send out a bill on 15 December and the fee is due by January 1. Permittee will be responsible for the entire cost of maintaining the site. The Permittee is responsible for providing and maintain all access roads, utilities and developments necessary for the establishment of this seasonal cabin/trailer.

Transfer of Permit, Assignments and Subleases – This permit may not be sold, bartered, assigned, transferred or used as collateral by the Permittee. The site and improvements may not be sublet to 3rd parties. The permittee may not hold an interest in any other site locations managed by the SD DGFP or the Bureau of Reclamation. This permit is for one staked site and no more than one cabin/trailer is allowed. The permit may not be held in the name of a corporation or trust.

AREA, CITY & NEIGHBORHOOD DATA

Shadehill Reservoir and South Dakota Game, Fish and Parks' Shadehill Recreation Area are located in Perkins County, SD. Perkins County sits in the northwest quadrant of South Dakota. In geographic terms, the county is the second largest in the state, covering 2,890 square miles. Its population, however, is diminutive, numbering only 3,033. This population estimate represents 1.8% growth over 2010 estimates but still lags behind the state and the rest of the country as a whole. The county's population has actually declined since 1970.

The unemployment rate in Perkins County is low, 3.3%, but average income hovers near \$28,000 and average per capita income is estimated at \$32,643.¹ The *median household* income is a little more than \$38,000. The county's largest sector of employment, agriculture, provides for roughly one fifth of the county's total jobs.

AREA CONCLUSION

The subject region is sparsely populated with an economic base that leans on agriculture. The region is remote; Perkins County is vast and mostly uninhabited as are the counties to the immediate east and west (it is a rural county). Further, the location of the reservoir is remote. Shadehill Reservoir is over half an hour from the nearest and largest population center in the county, Lemmon, which is called home by only 1,200 residents. Searches for real property transactions within the county reveal few transactions that are truly arm's length. The population within the county, combined with county income levels, is insufficient to support a thriving real estate market and statistics indicate few outsiders moving into the county. The economy of Perkins County is, by all indicators, slow but stable. There is little prospective demand for residential or recreational home sites within the near future.

¹ "A Summary Profile" [of Perkins County, SD]. *Economic Profile System-Human Dimensions Toolkit, Headwater Economics*, Web, 7 May 2015.

PROPERTY DESCRIPTION

The Shadehill Reservoir sits on the Grand River. The reservoir was formed by the construction of the Shadehill Dam, completed in 1951. The reservoir was part of the Reclamation's Pick Sloan Missouri Basin Program authorized in 1944. The reservoir covers some 5,000 surface acres or 7.33 square miles. The elevation of the reservoir is at 2,287 feet. The dam was originally intended to provide irrigation benefits to the area but the irrigation distribution system was never constructed due to salinity levels of the reservoir's water. The reservoir currently provides flood control for the area, fish and wildlife conservation, recreation, and silt detention.

The reservoir complex is managed by the South Dakota Game, Fish and Parks Department. They administer a public campground and private cabins which are rented. Recreational facilities on the reservoir are administrated by SD DGFP, as well. Facilities include a boat ramp, campground, lodge, running water serving some areas, electricity for RVs, camping cabins, and a lodge.

As previously mentioned, Parks administers the cabin/trailer sites which are the subject of this rental survey. Reclamation retains the sovereign right to land and facilities surrounding the reservoir and, per the most recent Management Agreement entered into with Parks², must grant approval before most potential changes affecting facilities, property, or the use of such property and facilities can be enacted.

The sites that are to be subject to the permit rate opined in this report are situated within four separate cabin/trailer site areas alongside the reservoir. The cabin/trailer site area in which each of the cabin/trailer sites is situated is indicated in the table on the following page.

² Management Agreement No. 00LM605078

Area Name	No. of Sites	Lot Nos.
North Cabin Sites	4	104, 106, 112 & 115
South Cabin Sites	15	51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 62, 64, 66, 68 & 78
West Cabin Sites	11	1, 6, 7, 8, 9, 10, 11, 12, 13, 14 & 15
Trailer Sites	<u>17</u>	1, 3, 4, 8, 9, 20, 22, 23, 25, 28, 29, 30, 33, 34, 36, 37 & 38
Total	47	

There are roads (dirt/gravel) that are maintained by SD DGFP that go around the perimeter of the reservoir and provide access to the cabin/trailer site areas. Site permittees are responsible for maintaining driveways to their respective sites.

Electrical service is available to the sites by Grand Electric Cooperative, Inc. and each site is billed individually. The permittee is responsible to develop and maintain their own sewer (septic) and water (domestic well & pump) systems. Article 17 of the Memorandum of Understanding between Reclamation and the SD DGFP indicates that it is the SD DGFP's responsibility to "provide litter control and trash removal."

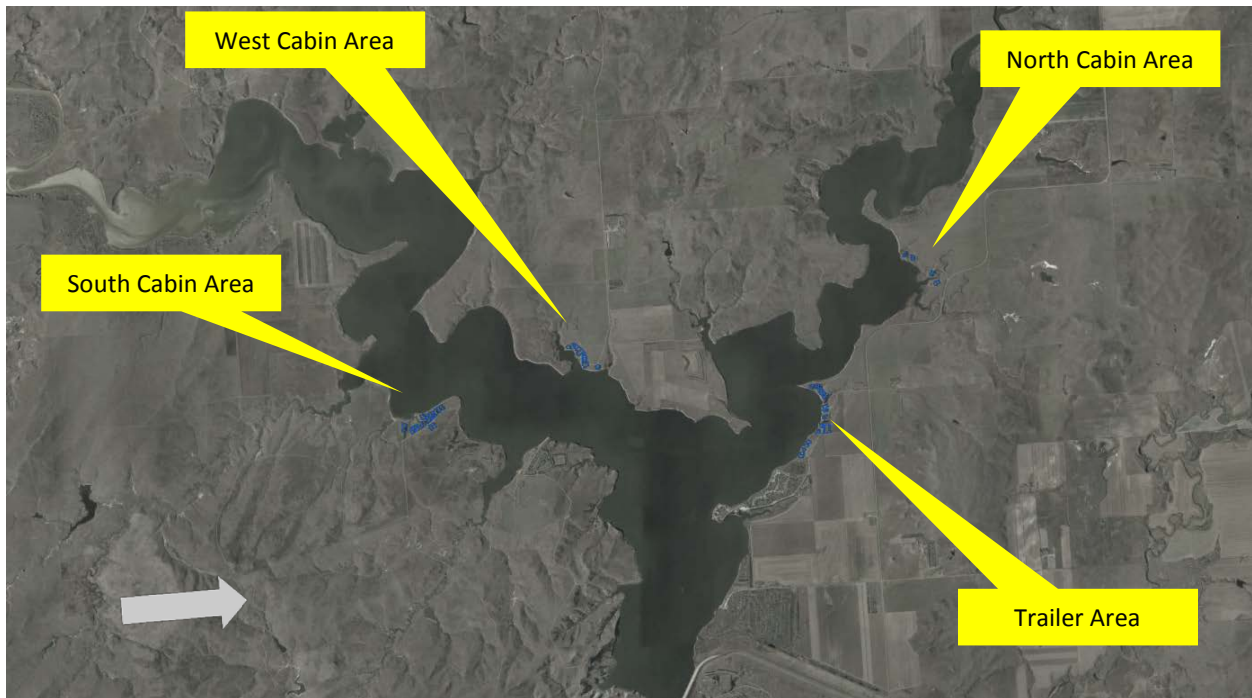
The sites vary in size from 0.3 acres to 0.7 acres. The size of the sites is not overly important as they are open lots with no fences between them and the public is allowed access to the reservoir across them. None of the staked sites are to the waterline; rather, they are well back from the edge of the waterline. All of the sites have access to the water however, and docks are allowed to be built for personal use. The sites in the North cabin area appear to be the most desirable as they do not side to each other rather they have significant distance between them and thereby making them more private. All but two of the sites in the West area are side by side. The sites in the South area are all side by side, with two sites that are not on the lakeshore rather are on the inland side of the road (Sites 57 & 59). The sites in the trailer area

are typically smaller but there is a lot of land around them that is outside of the staked areas so again they seem much larger. Six of the sites are side by side the others have quite a bit of distance between them.

The request of Reclamation is for the appraisers to estimate a permit fee for a typical site. Using that information Reclamation will estimate fees for the individual sites. The question then for the appraisers is what is a typical site?

We have defined a typical site as a site that is on the reservoir side of the access road and which is between 0.30 to 0.7 acres in size. That includes most sites. The lots that we consider superior to the typical site are the four sites in the North Cabin area inasmuch as they are not clustered together but very much more private. The sites considered inferior are the two sites (57 & 59) in the West cabin area as they are on the inland side of the road.

The following maps and satellite images show how the cabin and trailer sites are laid out around Shadehill Reservoir.





This picture shows the North Cabin area, host to four cabin sites.



The area shown is referred to as the Trailer site area as it is located off of North Cabin Road. Sites are outlined in red.



There are 11 cabin sites located in the West Cabin area.



The South Cabin area has 15 cabin sites.

SCOPE OF THE ASSIGNMENT

This assignment involves a survey and analysis of recreational housing options in the area of the Shadehill Reservoir. The valuation problem is to solve for current market rent for the typical cabin/trailer site as previously identified under the conditions set forth in the permit.

The standard methodology that would normally be employed to solve for this problem would be to identify lots or sites along other reservoirs/lakes in the area and survey them as to the rents/leases charged, and the associated terms of the rental or lease agreements. This methodology was not employed inasmuch as no reservoirs/lakes were identified other than Reclamation facilities that had cabin/trailer sites available for lease. With absence of data for this methodology the valuers necessarily depended upon alternate methodologies which, although less than desirable, were necessary to achieve some form of opinion. The alternate methodologies identified were a survey of RV Parks, a survey of mobile home parks and a lot/rate of return analysis that depended upon market lease data relative to private lots.

RV Parks are similar to the subject, particularly to the trailer sites, in that they are occupied by trailers or motor homes (both allowed on the subject sites), they are often resort oriented and they are rented on a daily, weekly or monthly basis. Some parks are rented by the season but none of this type was encountered in our survey. Mobile home parks (trailer courts) were thought to be somewhat similar in that the parks have home sites that allow homes similar to the cabins and the trailers found in Shadehill and the sites are typically leased on a monthly, annual or fixed term basis. The parks, however, are more often than not found in urban/suburban environments and are not resort oriented like the subject. Leased lots were the third alternative (the terms somewhat of a misnomer in that lots are typically not leased); a market lease rate can be solved for by estimating the market value of a lot and applying an annual rate of return (found in the market place), which then results in an estimate of annual rent. This methodology would be appropriate and helpful if lot sales in the vicinity of a lake/reservoir could be found.

Of these methodologies only the RV Park was deemed suitable for Shadehill Reservoir. Shadehill's location is remote and there are no mobile home parks in the immediate area. Lot

sales were found within the market area but none were located around lakes or reservoirs; they were all in the local urban area. The demand for residential lots is low due to the stagnant population growth and the price of the lots is very low, also due to minimal demand. Additionally, the adjustment necessary to reflect a lake amenity to the lot value was unsupportable. The valuers, under the scope of work performed, did undertake an analysis but in the end there was an absence of supportable market data to base an adjustment and as such, a quantifiable adjustment was not considered further.

We have inspected Shadehill Reservoir to the extent necessary to understand the cabin/trailer sites but also have relied on the Bureau of Reclamation and its managing agency and/or concessionaire for certain property information, tenancy information, expenses—if available, and other pertinent information. Rental information was gleaned from a number of RV parks that spanned a large geographic area inclusive of other Reclamation administrated reservoirs. Rental rates and other pertinent information were either obtained from or confirmed by a managing party or other office staff at each of the mobile home/RV Parks.

RV PARK - MARKET OVERVIEW

The comprehensive RV Park Rent Survey (covering North and South Dakota, Eastern Montana, and Eastern Wyoming) shows decipherable market trends as they pertain to location. Where the subject sits in relation to these geographic trends remains for analysis further on in the report. In general, RV parks situated within close proximity to areas traditionally patronized by tourists can charge more for site rent. The limited demand in remote location's such as Shadehill Reservoir typically renders low rents.

RV PARK - MARKET DATA SURVEY

A large geographical area was surveyed for RV parks to be used in our analysis. The rental survey conducted covered North and South Dakota, Southeastern Montana, and Eastern Wyoming. The survey included parks that bordered well known tourist destinations. The initial survey was intended to be fairly comprehensive; Google, the 2014 Woodall's Campground Guide, and the 2014 Good Sam RV & Travel Guide were all scoured for any privately-operated RV Parks located within the geographical breadth of the rental survey. In all, 82 RV parks were surveyed for rental information. Most parks were found along arterial highways but others were destination oriented. We selected four parks from the overall survey to compare to Shadehill Reservoir sites. They were selected due to proximity to the subject or their location near other lake/reservoirs.

Each RV Park included in the survey was contacted in order to determine or, as the case may have been, confirm rates. When reported, seasonal and monthly rates were used for our analysis. These rates included hookups for water, sewer, and electrical service. When rates differed between sites offering a 30 amp electrical service and a 50 amp electrical service, the 50 amp rate was used (although 30 amp service has been typical for RV parks in the past, 50 amp service is becoming more commonly available as parks compete for new, more electricity intense RVs).

We inquired and used seasonal rates (summer) as this is most applicable to Shadehill's cabin/trailer sites' seasonal use. In general, parks located within a reasonable proximity to popular tourist destinations were more likely to have intra-season rate changes; among parks

with variable summer rates, those near popular destinations were also found to introduce more frequent changes in rates. The busiest—and thus, most expensive—weeks or months centered around popular travel dates sometimes precipitated by specific events, e.g. South Dakota’s Sturgis Motorcycle Rally, Fourth of July weekend, Labor Day weekend. These increased rates for “peak” times were excluded from the survey, even though a spike in demand and rate for certain weeks or weekends sometimes effected rate changes for the entirety of the associated month(s). The comprehensive survey of RV Parks yielded only one RV Park within the subject’s market area; the RV Park will be referenced but not relied on solely to establish an indication of rental value.

RV Park – Elements of Comparison

Market area, tenant draw, distance to tourist attraction, distance to regional population center, the inclusion or exclusion of utilities, the presence or lack of varying amenities including stores and restaurants, Good Sam ratings, land/water features which might render a given park more or less appealing, and reputation were all considered for their importance to value. Obviously not all potential elements of comparison shared equal importance. Some elements interacted with each other or encroached on what other elements took into account; in some cases, assigning adjustments to multiple sets of elements—say, Good Sam³ ratings and amenities—would be outright redundant. It follows that separating and quantifying each individual element of comparison would prove impossible. Ultimately, those elements deemed to hold the most importance to value were used for the selection of rental properties that could be compared to the subject.

Elements of comparison thought to be of some importance, but for which no adjustments could reasonably be inferred, are merely represented in the included adjustment analysis charts. The inclusion or exclusion of electricity in the park rents is accounted for quantitatively, as is water and sewer service. Elements which obviously have some bearing on rent value, but for which no adjustment can be quantified, are accounted for qualitatively. Characteristics of private RV

³ Good Sam is an organization of recreational vehicle owners. Once a year, the organization publishes a directory of RV parks that are located within North America.

Parks that compare favorably to the corresponding element of the subject are noted as superior with a minus symbol (-) - Characteristics of private RV Parks that are inferior are denoted with a plus symbol (+).

Location

In the comprehensive survey of the greater region, rent for RV sites and mobile home sites generally correlated positively with desirability of location. RV Parks in locations central to tourism benefited from high demand and generally charged more rent than their more remotely located peers.

Only one park offering RV sites was found within the county, making quantification of adjustments difficult. One park did not constitute sufficient data with which to reliably gauge rent so parks located next to other remote reservoirs were considered. The reservoirs at which the parks were located are similar in their remoteness and their hosted activities but draw from different sized population bases.

“Distance decay” is an effect on travel and tourism frequently studied by researchers in those fields. Distance decay is premised on the observation that the percentage of population drawn as visitors to a destination tends to decline as the distance from population to destination grows; in other words, those living close to a given destination are more apt to visit it than those living further away. Distance decay is not a linear correlation and is affected by variables such as type and desirability of destination and the socioeconomic status’ of the populations from which potential visitors are attracted. The reservoirs at which the comparable RV parks and the subject sites are located share similar characteristics which, in turn, should draw similar types of visitors; Lake Sakakawea, Heart Butte Reservoir, Shadehill Reservoir and Glendo Reservoir all offer camping, fishing, swimming, and motorized boating.

Using 2010 U.S. Census data, the Missouri Census Data Center offers tools for estimating population based upon geographic constraints⁴; the number of people residing within radii of 30, 50, and 100 miles from the respective reservoirs is shown in the following table.

Number of residents within:	Heart Butte Reservoir	Shadehill Reservoir	Glendo Reservoir	Lake Sakakawea
30 miles	7,560	4,187	14,154	14,692
50 miles	47,565	8,992	28,620	28,890
100 miles	194,442	129,027	296,654	279,927

Research suggests that the majority of visitors to such outdoor recreation areas live within a 100 mile radius⁵; the majority of those visitors are drawn by “non-viewing” recreational activities such as those hosted by each of the reservoirs (camping, fishing, swimming, and boating). The larger numbers from which Glendo Reservoir likely draws its visitors is apparent in the preceding table. The effect of the numbers can’t be quantified because there may be other variables in play; however, the superior potential population draw of some reservoirs suggests that qualitative adjustments are appropriate for parks located near those reservoirs. Subsequently, the locational advantage of parks located near Glendo Reservoir, Heart Butte Reservoir and Lake Sakakawea will be represented qualitatively on the adjustment chart.

⁴ “Circular Area Profiles (CAPS) – Version 10C”. **Missouri Census Data Center**. 20 August 2014. Web. <http://mcdc.missouri.edu/websas/caps10c.html>. 5 June 2015.

⁵ Burns, Graefe, & Nyaupane. “Does Distance Matter? Differences in Characteristics, Behaviors, and Attitudes of Visitors Based on Travel Distance”. Murdy, James, comp., ed. 2004. **Proceedings of the 2003 Northeastern Recreation Research Symposium**. Gen. Tech. Rep. NE-317. Newton Square, PA: U.S. Dept. of Agriculture, Forest Service, Northeastern Research Station. 459 p.

Dates of Operation

Dates of operation are for informational purposes. Since the rates obtained for the survey were non-peak monthly rates for the recreational season, an RV park's dates of operation should have no bearing on rent charged.

Utilities

In most instances, the monthly rate charged by an RV Park included electricity and access to any of the complementary on-site amenities which the daily and weekly tenants enjoyed. It was the policy of a minority of RV Parks, however, that tenants renting on a monthly basis pay for their own power consumption. In such cases meters were used to measure usage. Different locations were served by different utility companies so the rates paid for power naturally varied. In order to account for the fact that the sites in Shadehill did not have electricity in their annual permit fees, a quantitative adjustment was made in order to yield the effective monthly rate (different electricity rates prevailed among the respective locales so adjustments differed by location and were based upon tenants' plausible power consumption). Park managers indicated that, for two inhabitants of one recreational vehicle, the consumption of about 600 kWh of electricity over the course of a summer month was reasonable. The presumed use of 600 kWh yielded adjustments from \$50 to around \$90, depending upon which of the utility companies served the respective parks. 600kWh of electricity, an estimated month's use, within the subject's power district costs \$56.01. This consumption of power is only assumed for the six months in which the tenant is allowed to occupy the site. Maintaining service for the remaining months, assuming no consumption of power (although there may be a marginal amount used to prevent freezing), costs only \$10.00 per month. The effective adjustment then is \$66.00 (12 months usage over 6 months).

Other Utilities

In all cases, water, sewer, and garbage were included in a tenant's rent at RV parks. The cabin/trailer sites at Shadehill Reservoir are responsible for maintaining and paying for their own sewer, water, and garbage services. Garbage is considered to be a nominal cost in an RV park, residential services vary from \$35 to \$55 per month. For Shadehill the valuers have estimated a cost of \$25.00 per month.

As mentioned earlier, the cabin/trailer sites are commonly on septic systems and have domestic wells and pumps. The domestic wells and the septic systems were developed at the cost of the permittee.

The average cost of a small septic system with leach field is estimated by Septichog.org to run \$4,500.00. A domestic well will run \$15.00 to \$30.00 per foot to drill; the pump, pressure tank, piping, electrical etc., can add another \$2,500 to \$8,000 (Costhelper.com). An average system (100 feet) costs approximately \$5,000. The valuers estimate that the total cost of a well/septic system to be say, \$10,000.00. The systems have a life of 30 year to 40 years; if amortized at 3% (mortgage rate higher than reinvestment rate) for 30 years the monthly cost would \$42.00. This monthly cost spread over six months calculates to \$84.00.

Included Amenities

RV Parks include a number of amenities for the comfort and enticement of potential guests. Among the most common were Wi-Fi, cable television, and swimming pools/hot tubs. Wi-Fi was offered free of charge almost universally among RV Parks in the greater regional survey. The presence of any or all of these amenities likely proves of importance in the selection of an RV park by some guests so the amenities are accounted for qualitatively. The importance of such amenities is likely dwarfed by the setting of the campground sites themselves however. Subsequently, qualitative adjustments to included amenities are not weighed heavily in the comparison of market rents.

Site Amenities

The layout and setting of the sites within the respective RV park(s) were compared to the layout and setting of the sites located near Shadehill Reservoir. Settings considered desirable for recreational purposes, like nearness to a body of water or commonly used recreation site, compared favorably to sites lacking such a setting. Larger sites and sites with privacy were also considered superior to smaller sites or sites which lacked privacy.

RV PARK – MARKET ANALYSIS

The quantitative and qualitative analyses of the four RV parks selected for comparison to Shadehill Reservoir’s trailer/cabin sites are represented in the following summary adjustment chart.

Subject	Comparable 1	Comparable 2	Comparable 3	Comparable 4	
RV Park	Shadehill Grove RV Park & Bait Shop	Red Rock Resort	Glendo Lakeside RV Park	Indian Hills Resort	
Location	Shadehill Reservoir, SD	Shadehill, SD	Glen Ullin, ND	Glendo, WY	Garrison, ND
Tenant Draw	Heart Butte Reservoir	Grand River/ Shadehill Reservoir	Next to Heart Butte Reservoir	Next to Glendo Lake	Next to Lake Sakakawea
Dates of Operation	May 1 – October 31	May - November	May 1 - Nov 15	Apr 1 - Nov 15	May 1 - Nov 16
Monthly Rate		\$395.00	\$200.00	\$500.00	\$575.00
Electricity Included	No	Yes	No	No	Yes
Elec. Adjustment		\$(66.00)			\$(66.00)
Garbage Included	No	Yes	Yes	Yes	Yes
Garbage Adjustment		\$(25.00)	\$(25.00)	\$(25.00)	\$(25.00)
Water/Sewer Included	No	Yes	Yes	Yes	Yes*
Water Adjustment		\$(42.00)	\$(42.00)	\$(42.00)	\$(42.00)
Sewer Adjustment		\$(42.00)	\$(42.00)	\$(42.00)	*
Effective Non-Peak Monthly Rate for Recreational Season		\$220.00	\$91.00	\$391.00	\$442.00
Included Amenities					
Internet	No	Wi-Fi incl.	No	Wi-Fi incl.	Wi-Fi incl.
Cable TV	No	No	No	No	No
Pool/Spa	No	No	No	No	No
Available Amenities					
Laundry	No	No	No	Yes	Yes
Showers	No	No	No	Yes	Yes
Store	No	Yes	No	Yes	Yes
Amenities Adjustment		0-	0	-	-
Site Layout & Setting (adjustment)	Most sites front Shadehill Reservoir	Walking distance to Grand River; one-half mile to Shadehill Reservoir (+)	Adjacent to Heart Butte Reservoir. Most sites do not front reservoir. Typical RV layouts (75' x 50') (+)	Adjacent to Glendo Lake. Sites do not front reservoir. Typical RV layouts. (0+)	Adjacent to Lake Sakakawea. Most sites do not front reservoir but have shade and views. (0)
Location Draw (adjustment)	Heart Butte Reservoir, ND	Shadehill Reservoir, SD (0)	Heart Butte Reservoir, ND (0-)	Glendo Lake, WY (-)	Lake Sakakawea, ND (-)
		Inferior (+)	Slightly Inferior (0+)	Superior (0-(-))	Superior (-(-))
Value Indication		> \$220.00	> \$91.00	< \$391.00	< \$442.00

*Dumping station only

The subject sites have a destination resort location, with frontage and direct access to the reservoir they are also much larger in size than the typical RV Resort site. The unadjusted rentals from the comparables ranged from a low of \$200 on to a high of \$575 on a monthly basis. Following the quantified adjustments the comps indicate a range from a low of \$91 to a high of \$442. On a qualified basis, Comps 1 and 2 were considered inferior to the subject while Comps 3 and 4 were considered superior overall. Comp 1 is in the neighborhood of the subject (Shadehill Reservoir) and its indication is \$220 per month; however, the park does not have lots that front the lake and the lots are smaller than the subject's. It sets the low end of the range for the subject's typical sites however. Comp 2 is located near a reservoir with a larger potential population draw but does not offer frontage lots and, when weighed against the survey of the greater region's RV parks, charges much less than the likely market rate. Comp 3, located next to the Glendo Reservoir, has a destination resort location like the subject's. Although its sites do not front the reservoir and are much smaller in site size, Comp 3's location at Glendo Reservoir offers superior amenities and draws from a much larger population—rendering it overall superior. Comp 4, located within 100 miles of Bismarck—the capital and largest city of the state—is a destination resort located next to the popular Lake Sakakawea. Comp 4's sites are smaller than those along Shadehill Reservoir's but, overall, compare favorably and are considered significantly superior.

Comp 1 is in the neighborhood of the subject but while it possesses the same lake influence, it has neither the water frontage nor the superior size of the subject sites; all things considered, Comp 1's indicated value of \$220 sets the low end for the subject's indicated rent range. Comp 3, with its superior facilities and a lake location that draws from a significantly larger population than Shadehill Reservoir, sets the upper end of the range at \$391. None of the indications are a model match for the subject however we have to give greatest weight to Comp 1 as it is very near the subject. Given everything, we have concluded that \$300 per month is a reasonable estimate of market rent for the subject typical site (\$74 premium for the lot size and the lake frontage a 32% adjustment).

The length of occupancy that is allowed at the subject is six months, the indicated rental for the season then is \$1,800. The trailer, however, must be stored in the off months; at the subject it

just sits there while at Shadehill Grove RV Park the trailer must either be removed and stored elsewhere or incur an extra monthly cost for storage. Self-storage facilities within the region generally charge about \$30 per month for outdoor RV storage. RV Parks charge about \$50 a month for off-season storage—as does Shadehill Grove—and have the added benefit of convenience to the tenant. We have concluded that \$50 per month is a reasonable estimate for a storage rent. Applying the going monthly rate to the off-season months adds a nominal charge of \$300. The total estimated market rent then that must be paid in a year's time is \$2,100 (\$1,800 + \$300).

EXHIBITS & ADDENDA

SUBJECT PHOTOS & EXHIBITS



This picture was taken facing east-southeast. This lot is identified as "T 04" in RECLAMATION records. The lot is accessed from North Cabin Road and is fairly typical for the cabin sites that collectively form the North Cabin Area.



Looking southwest at an array of cabins located within Shadehill's West Cabin Area sites. The cabin sites are described in RECLAMATION records, from near to far, as sites W08, W09, and W10.



Pictured are two cabins sitting, respectively, on lots S52 and S51 of Shadehill's South Cabin Sites. The picture was taken looking west. Lot S51 is occupied by the blue house in the background.



This picture was taken looking west at Shadehill Reservoir from the bank of one of the North Cabin Area's sites.

COMPARABLE RENTAL DATA SHEETS

Rent Comparable 1



Property Type	RV Park
Name	Shadehill Grove RV Park & Bait Shop
Address	11254 Shadehill Rd., Lemmon, SD 57638
Tenant Draw	Shadehill Reservoir
Dates of Operation	May to November
Number of Units	11
Setting & Location	Shadehill Grove is located off of Shadehill Road, accessed off of S.D. 73. The small RV park is less than one and a half miles east of Shadehill Reservoir as the bird flies. Shadehill Grove is within walking distance to the Grand River, commonly frequented by anglers. The main draw for the park is fishing. The park offers grass, shade, and full hookups.
Amenities	Shadehill Grove offers a bait shop on site and free Wi-Fi. There are no laundromats or showers on site.
Utilities	All utility hookups are available and electricity is included with rent.
Rate	Rent is \$395 per month; offseason RV storage is \$30 per month.
Terms	Monthly
Source/Confirmation	Manager at 1-605-374-4146

Rent Comparable 2



Property Type	RV Park
Name	Red Rock Resort
Address	5425 71st Ave., Glen Ullin, ND 58631
Tenant Draw	Heart Butte Reservoir (Lake Tschida)
Dates of Operation	May 1 – October 1
Number of Units	> 30
Setting & Location	Red Rock Resort is located on the north side of Heart Butte Reservoir. The aerial photography shown encompasses only a part of Red Rock Resort.
Amenities	There are no amenities beyond access to the lake included with rent at Red Rock Resort.
Utilities	All utility hookups are available but tenants are responsible for the utility costs that they incur.
Rate	Rent is seasonal and averages out to \$200 per month. 600 kWh of electricity costs the tenant another estimated \$84.78.
Terms	The resort only leases seasonally ; the current rate is \$1,000 per season.
Source/Confirmation	Staff at 1-701-220-7169

Rent Comparable 3

Property Type	RV Park
Name	Glendo Lakeside RV Park
Location	631 Lakeshore Drive, Glendo, WY 82213
Tenant Draw(s)	Glendo Reservoir
Dates of Operation	April 1 through November 15
Number of Units	> 40
Park Description	Glendo Lakeside RV Park is located adjacent to Glendo Lake in Eastern Wyoming. The closest town, Glendo, only has a population of about 200 but the lake—and the RV park—is convenient to Interstate 25 which connects Casper and Cheyenne. Both population centers are a little over an hour from the lake.
Amenities	The campground has laundry facilities, shower facilities, a rec hall, and offers free Wi-Fi.
Utilities	Water and sewer are included. Electricity is billed separately for long term tenants. The provider is Wheatland REA. 600 kWh in the Wheatland REA costs an estimated \$97.00.
Non-Peak Summer Rate	\$500 per month
Terms	Monthly
Source / Confirmation	Staff at 1-307-735-4161

Rent Comparable 4

Property Type	RV Park
Name	Indian Hills Resort
Location	7276 14 th NW, Garrison, ND 58540-9601
Tenant Draw(s)	Lake Sakakawea
Dates of Operation	May 1 – November 16
Number of Units	55
Park Description	Indian Hills Resort and Campground is located on Lake Sakakawea in North Dakota. The resort is roughly two hours from Bismarck, ND. In addition to RV sites, the resort rents condos, cabins, tent sites, and boat slips.
Amenities	The campground has shower facilities, a shop, a free Wi-Fi connection, and boat docks.
Utilities	All utilities are included with the monthly rental fee but there are no direct sewer hookups; only a dump station. 50 amp connections are limited and are available for monthly tenants but tenants renting at a cheaper, seasonal rate.
Non-Peak Summer Rate	\$575 per month
Terms	Monthly or Seasonal (50 amp connections are not available for seasonal renters)
Source / Confirmation	Staff at 1-701-743-4122

APPRAISER QUALIFICATION

Charles W. LaFlamme, MAI

Actively engaged as a real estate analyst and consulting appraiser since 1974.

Review Appraiser - Office of Valuation Services - Department of the Interior

2180 Harvard Street, Suite 380

Sacramento, CA 95815

(916) 566-7036

claflamme@ios.doi.gov

Professional Background

Owner - North Valley Land Services, Chico, CA (2002-09)

Independent appraiser – Sacramento, CA (1998-02)

Owner - Urban Pacific Services Corp, Newport Beach/Irvine, CA (1982-98)

Staff Appraiser - Foreman, Thompson & Associates/REAN, Newport Beach, CA (1975-82).

Staff Appraiser - State Mutual Savings, Newport Beach, CA (1973-75)

Educational Activities

BA Degree, Business and Economics, Chapman University (1976)

Certificate, Suburban Agriculture, Sierra College (2002)

Has successfully completed the following courses:

SREA 101 - An Introduction to Appraising Real Property

SREA 201 - Principals of Income Property Appraisal

AIREA II - Urban Property

AIREA VI - Investment Analysis

AIREA VIII - Litigation Analysis

AI - Valuation of Conservation Easements

AI - Uniform Appraisal Standards of Federal Land Acquisitions

AI - Advanced Market Analysis and Highest & Best Use

AI – Review Theory - General

IRWA Skills of Expert Testimony

IRWA Course 101, Sec. 3 Real Estate Acquisition Law

IRWA Course 901 Engineering Plan Development

IRWA Course 902 Property Descriptions

IRWA Course 802 Legal Aspects of Easements

ASFMRA Ranch Appraisal I & II

Also has taken numerous graduate courses in business, finance, mathematics and statistics, and attended seminars in valuation problems, real estate economics, and mineral economics.

Licenses and Certifications

MAI member of the Appraisal Institute, Certificate No. 6585 (1982)

Certified General RE Appraiser, California - Bureau of RE Appraisers - AG002325 Exp. 2/2016

Professional Work

Member, Assessment Appeals Board, Sacramento County (2000-2002)

Past President - Sacramento-Sierra Chapter - Appraisal Institute (2010)

Chair, Region 1 - National Board of Directors – Appraisal Institute (2012-2014)

Expert Testimony

Superior Court - Orange County, Los Angeles County, Butte County

Federal Bankruptcy Court - Orange County, Los Angeles County, Sacramento County

Adam Bradshaw

Appraiser Trainee

401 W. Peachtree St. NW, Ste. 1705

Atlanta, GA 30308

(404) 526-0091

adam_bradshaw@ios.doi.gov

Professional Background

State of Georgia Registered Real Property Appraiser (No. 355805)

Appraiser Trainee – Department of Interior, Office of Valuation Services (Sep. 2013 – Present)

Educational Activities

BA Degree, English, Washington State University (2011)

AAS Civil Engineering Technology, Walla Walla Comm. College (2000)

Has successfully completed the following courses:

Comparative Analysis, Appraisal Institute (AI), 2013

Basic Appraisal Principles, AI, 2013

Basic Appraisal Procedures, AI, 2013

15-Hour National USPAP, AI, 2013

Residential Report Writing & Case Studies, McKissock Institute, 2013

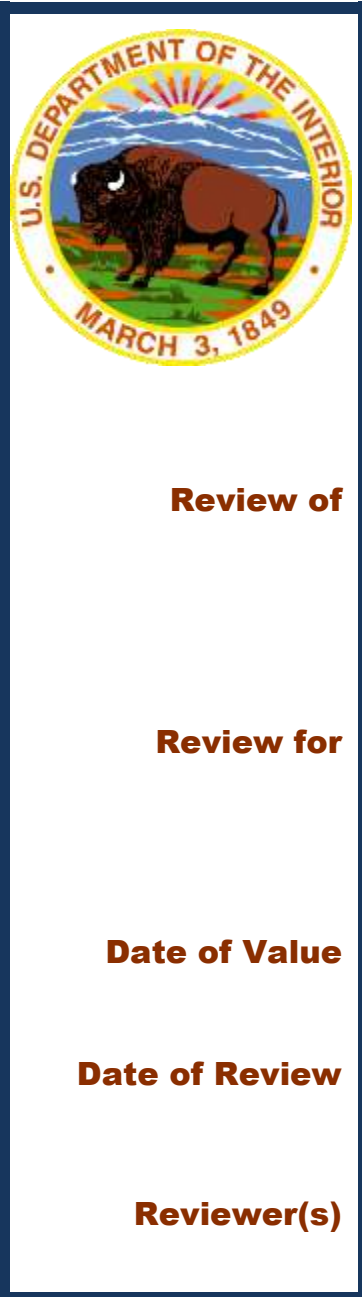
Best in Business Ethics, American Society of Farm Managers & Rural Appraisers (ASFMRA), 2014

Sales Comparison Approach, ASFMRA, 2014

Market Analysis/Highest & Best Use, ASFMRA, 2014

Cost Approach, ASFMRA, 2014

Income Approach 1, AI, 2015



Appraisal Review Report

Review of

A Market Rent Survey for typical Cabin / Trailer Sites situated around the Shadehill Reservoir in Perkins County, South Dakota

Review for

U.S. Bureau of Reclamation
Attention: Alex Morgan
Great Plains Region
2121 4th Avenue, North
Billings, Montana 59101

Date of Value

August 24, 2015

Date of Review

September 1, 2015

Reviewer(s)

Steven G. Murphy
Office of Valuation Services



United States Department of the Interior

AS-Policy Management and Budget
Office of Valuation Services
1340 Financial Boulevard
Reno, Nevada 89502

Transmittal

IVIS Number: P14028 **Date:** September 1, 2015

Agency Case ID: 00065193 / Shadehill Reservoir Cabin / Trailer Site Market Rent Survey

To: U.S. Bureau of Reclamation
Attention: Alex Morgan
Great Plains Region
2121 4th Avenue, North
Billings, Montana 59101

Subject: Appraisal Review
A Market Rent Survey for typical Cabin / Trailer Sites situated around the
Shadehill Reservoir in Perkins County, South Dakota

My review report concerning the appraisal of the above captioned property follows this letter, comprised in these sections:

Executive Summary	4
Review Scope of Work	5
Review Analysis	7
Review Conclusion	12

This appraisal involves the estimation of annual market rent for the cabin / trailer sites found around Shadehill Reservoir in Perkins County, Montana. The rent estimates were prepared by Adam Bradshaw and Charles W. LaFlamme, MAI of the Office of Valuation Services. The rents are reflective of the terms in permit agreements that are associated with the sites.

The cabin / trailer sites are on federal land that surrounds the Shadehill Reservoir. The reservoir and the land surrounding the reservoir are administered by the Bureau of Reclamation on behalf of the United States of America. The cabin / trailer sites are not legal lots, rather are sites defined by site plans and which are used by permittees in accordance to the terms of a permit agreement, which include the annual payment of a permit fee / rental.

Enter reviewer phone number and email.

As the intended use of the assignment result was to opine to a current market rent for a typical cabin / trailer site surrounding the reservoir, specific property rights were not appraised. Further, the assignment was not based on any extraordinary assumptions or hypothetical conditions.

Based on my review dated September 1, 2015, I **APPROVE** the appraisal for your use. The appraisers concluded to an annual cash equivalent market rental rate per cabin / trailer site as of August 24, 2015 of \$2,100.



Steven G. Murphy

Executive Summary

	Appraisal
Appraiser(s)	Adam Bradshaw and Charles W. LaFlamme, MAI, appraisers with the Department of the Interior’s Office of Valuation Services
Property Owner	United States of America, as administered by the Bureau of Reclamation
Property Appraised	None; the assignment was to opine to an annual rental for the typical cabin / trailer site located on land surrounding the Shadehill Reservoir.
Real Property Interest	As specific individual cabin / trailer sites were not part of the assignment, a specific real property interest was not appraised. The annual rent opined is characteristic of a Permit Agreement.
Extraordinary Assumptions	None
Hypothetical Conditions	None
Highest & Best Use	Not applicable – valued per the terms of the permit agreement
Date of Value	August 24, 2015
Market Rental Value	The appraisers opined to \$2,100 per year for a typical cabin / trailer site.

Review of the Appraisal

Client	U.S. Bureau of Reclamation Attention: Alex Morgan Great Plains Region 2121 4th Avenue, North Billings, Montana 59101
Intended User(s)	The U.S. Bureau of Reclamation’s Great Plans Region (Reclamation) and the Office of Valuation Services (OVS), both on behalf of the United States.

Intended Use	To establish a current annual rental / permit fee for a typical cabin / trailer site situated around the Shadehill Reservoir. Reclamation intends to use the assignment results to establish the current annual permit fee for each of the 47 sites surrounding the reservoir that are under the jurisdiction of Reclamation.
Date of Review	September 1, 2015
Review Conclusion	APPROVE

Review Scope of Work

Regulatory Compliance	My review development and this review report comply with: <ol style="list-style-type: none">1. USPAP, Standard 32. OVS Valuation Policy Manual (602 DM 1)
Purpose of the Assignment	This review concludes the appraisal report's credibility by analyzing the <ol style="list-style-type: none">1. Completeness of the material presented within the applicable scope of work2. Accuracy, adequacy, and relevance of the data and propriety of adjustments to the data3. Appropriate appraisal methods and techniques4. Appropriateness and reasonableness of the analysis, opinions, and conclusions5. Current usefulness to the intended users of my review report
Extent of Review	<p><i>Appraisal Report:</i> The reviewer's opinion about the quality of the work under review encompasses the completeness, adequacy, relevance, appropriateness, and reasonableness of the data and analyses presented based on the assignment's scope of work, purpose of the assignment, regulatory reporting requirements, and the valuation definition relied upon. Relative to these parameters, the review appraiser received a first submission of the appraisal report on August 24, 2015, with a reading of the report and items identified for discussion with the appraiser conducted the same day. On August 25, Chuck LaFlamme and review appraiser discussed the appraisal in detail and a revised report was submitted to OVS for review on August 27 with the final report submitted on August 31. This review report was finalized on September 1, 2015.</p> <p><i>Subject Property:</i> The extent of the review process concerning the subject assignment primarily consisted of reviewing of all the materials provided for the assignment. In addition, the review appraiser viewed</p>

the subject Shadehill Reservoir and the areas surrounding the Reclamation cabin / trailer sites via the Google Earth aerial application.

Market Research: The primary market research performed by the reviewer for the assignment consisted of the review of the market rental survey report and the reviewing of the property specific materials provided by the Reclamation. In addition, to the extent reasonable, the reviewer viewed the rental comparables through Google Earth aerial photographs. The reviewer did not inspect the Shadehill Reservoir cabin / trailer sites nor the rental comparables and did not otherwise verify any of the non-subject information presented in the work under review or research any additional data relating to the assignment.

**Limiting
Conditions**

- I do not authorize the out-of-context quoting from, or partial reproducing of, this review report.
- I base this review report on information and data contained in the market rental survey report.
- I assume that the data contained in the market rental survey report are factual and accurate.
- I reserve reconsidering my review conclusions should information become available that contradicts the data relied on in the market rental survey report.

**Extraordinary
Assumptions** None.

**Hypothetical
Conditions** None.

**Consult with
Appraiser** *Instructions:* The level of consulting with the appraisers relative to the assignment problem was based on the assignment instructions in the Statement of Work. In addition, the review appraiser was available to answer questions from the appraisers during the course of the review process.

Pre-Work Meeting: Due to the relative straightforward nature of the rental survey assignment, a pre-appraisal meeting was not performed; the appraisers worked in tandem to establish credible assignment results.

Requests for Revision: On August 24, 2015 the appraisal report was submitted to OVS for review. On August 25, items of clarification were shared with the appraisers for consideration in a final report. On August 31, the final appraisal report was submitted to review appraiser for final review.

Review Analysis

Certification Adequate

All USPAP certification items are present.

Limiting Conditions Adequate

The general assumptions and limiting conditions are generally appropriate to the assignment. The extraneous qualifications did not detract from the credibility of the assignment results.

Extraordinary Assumptions Not applicable

The intended use of the assignment was to opine to a current annual rent for cabin / trailer sites situated around the Shadehill Reservoir. In that no specific property was appraised and to the extent that current market data was relied on, no extraordinary assumptions were deemed applicable to the assignment.

Hypothetical Conditions Not applicable

Scope of Work Adequate

The scope of work necessary for a credible assignment results is generally subjective to the appraisers and it is sometimes difficult to ascertain unless the appraisers specifically provide in detail concerning what due diligence was and was not undertaken. Relative to scope of work for the subject assignment, certain scope activities were cited, but said was somewhat generic in nature, requiring the overall scope of work to be gleaned from the references of other due diligence performed elsewhere in the report. Overall, based on the complexity of the assignment problem and the due diligence that is evident from within the report, the scope of work for the assignment was adequate.

Client Adequate

OVS was appropriately identified as the client for the appraisal assignment.

Intended Users DEFICIENT

Reclamation was appropriately identified as an intended user of the appraisal report, while although OVS is cited to be the assignment

client, OVS was not cited as an intended user. This deficiency of not identifying OVS as an intended user does not detract from the credibility of the assignment results as the intended use of the report by OVS is inferred. No other intended users of the appraisal report were identified.

Intended Use Adequate

The assignment results will be used by Reclamation to establish to establish the current annual permit fee for each of the 47 sites surrounding the Shadehill Reservoir. The intended use of the market rent survey report by OVS is to review for compliance with the requirements set in the assignment's SOW. The report and its opinion of market rent are not intended for any other use or purpose.

Date of Value DEFICIENT

The subject assignment reflects an August 24, 2015 date of value that is within 30 days of the date of the first report submission of August 24, 2015.

Date of Report Adequate

The date of the report appropriately corresponds to the final date of the last revision of the report per the requirements of USPAP.

Definition of Market Rental Value Adequate

The introductions to the definition of market rent references the determination of right-of-ways, which are not relevant to the assignment. In that the definition of market rent is appropriate, the this deficiency does not detract from the credibility of the assignment results.

Property Rights Appraised Not applicable

As specific individual cabin / trailer sites were not part of the assignment, a specific real property interest was not appraised. The annual rent opined is characteristic of a Permit Agreement.

Summary of Appraisal Problems Adequate

A specific Summary of the Assignment Problem was not presented, however, the report sufficiently identifies the assignment problem through the various descriptions provided in other sections of the

report.

Legal Description Not applicable

Specific cabin / trailer sites were not appraised; the assignment consists of a market rent survey for a typical cabin / trailer site around the Shadehill Reservoir.

Contact with Owner Not applicable

Specific cabin / trailer sites were not appraised; the assignment consists of a market rent survey for a typical cabin / trailer site around the Shadehill Reservoir.

Property Inspection Adequate

The appraisers inspected the 47 cabin / trailer sites around the Shadehill Reservoir on October 7, 2014.

Location and Neighborhood Adequate

Property Description Adequate

Legal and Physical Access Adequate

Use, Rent, and Sale History and Analysis Not applicable

Tax Assessment Analysis Not applicable

Zoning and Land Use Restrictions Not applicable

Other Adequate

The market rental survey report reasonably summarized the characteristics of the Reclamation cabin / trailer sites and provided a credible market overview.

Valuation

Highest and Best Use Estimate	Not applicable
Comparable Rentals Selection	Adequate <p>The report draws to the intended users' attention that there was a dearth of comparable rental data in the market to analyze and that no comparables with identical characteristics to the Shadehill Reservoir cabin / trailer sites were identified. Accordingly, the analyses expanded the search outside the subject's immediate neighborhood with a selection of four comparables. Although the comparables considered had varying physical characteristics when compared to the Shadehill Reservoir cabin / trailer sites, the comparables were considered to be the most relevant available for the assignment.</p>
Comparable Rentals Description	Adequate
Adjustment Characteristics	Adequate <p>The appraisal reasonably considered the primary factors that influenced the rental fees charged by the comparable properties.</p>
Adjustment Methodology	Adequate <p>Due to the limitations of the available market data, there were no matched paired analyses to obtain adjustments. The appraisal methodology relied used the available data to the extent possible and ultimately employed a bracketing technique. Although the overall adjustment methodology employed seemed somewhat contrived and definitely qualitative, the technique is a reasonable methodology when insufficient comparable rentals are available. Essentially the analyses relied on the limited market data available in conjunction with the appraiser's experience and judgment.</p>
Unit of Measurement (GBA/NRA/UA) Selection	Adequate
Expense Basis (NNN, Full Service, Gross, etc.)	DEFICIENT <p>Although not specifically cited, the analyses clearly inferred the</p>

characteristics of the rent per year conclusion.

Lease Terms	Adequate
Conditions of Lease	Adequate
Tenant Improvement Allowance	Not applicable
Market Conditions	Adequate
Location	Adequate
Physical Characteristics	Adequate
Economic Characteristics	Adequate
Use	Adequate
Other	Adequate

The analyses presented reasonably took each of the comparables into consideration and correlated their rental characteristics to a typical cabin / trailer site rental.

Rental Value Reconciliation Adequate

In the final analyses, the appraisal reasonably correlated the annual rental per cabin / trailer space indicators from the comparables through a bracketing technique. The appraisal considered the characteristics of the adjustments made to each comparable as well as considered the weighing of the comparable indicators to opine to an annual market rental conclusion.

Review Conclusion

Completeness and Accuracy of the Material Presented

In developing an opinion about the completeness of the material under review, the initial rental survey report submitted included a few items needing clarifications. Such items required the reviewer to discuss the issues with the appraisers to obtain clarification and as appropriate, the enhancement to the report to facilitate understanding and completeness. To the clarifications required, the appraisers were responsive to the discussion and desiring to improve the quality and clarity of the work product. Overall, given the nature of the assignment problem and the scope of work performed, it is the reviewer's opinion that the completeness of the material under review is reasonable for use by Reclamation.

Adequacy and Relevance of the Data and Propriety of Adjustments

It is the reviewer's opinion that relative to the constraints of the market, the data contained in the rental survey report was adequate and relevant to solving the assignment problem. However, it is also the reviewer's opinion that enhancements to the adjustment discussions could benefit intended users' understanding relative to the assignment process. Still, the assignment analyses presented appeared to conform to the appraisers' peers' perspectives and as such, the analyses were deemed credible for use.

Overall, it is the reviewer's opinion that the adjustments were reasonable relative to establishing the propriety and credibility of the adjustments made or not made. In addition, the reviewer is of the opinion that the assignment reasonably relied on qualitative considerations and a bracketing technique applied such that the adequacy and relevance of the data and propriety of adjustments were reasonable.

Appropriateness of Appraisal Methods and Techniques

The typical cabin / trailer sites located around the Shadehill Reservoir are considered lakefront properties. The use of the sites are restricted to a six-month period during the year reflective of seasonal vacation rental; year round occupancy is not allowed. Other reservoirs in the state area also government owned. No private lakes were encountered where similar seasonal vacation sites could be found that would be considered market driven. The appraisers had to survey alternate forms of rental housing to measure the reasonable rent that could be achieved. To that end the appraisers surveyed RV Parks and mobile home or trailer parks. RV parks were surveyed because they cater to vacation travelers and because they are often rented on a monthly or seasonal basis. Additionally, mobile home parks were surveyed because many of the homes on the cabin / trailer sites are mobile homes and park rents are either on a monthly or annual basis.

Overall both surveyed sources were deemed relevant and adequate method to form the opinion of market rental value. The method and technique applied were found to be indicative of the market in the analyses of properties similar to the subject assignment and as such, it is the reviewer's

opinion that the methods and techniques used in the report were sufficient to reasonably support the opinion of market rental value for the intended use of the report.

Appropriateness and Reasonableness of the Analysis, Opinions, and Conclusions

The rental survey analyses performed was deemed relevant and adequate to form the opinion of market rent for the subject assignment; the analyses performed were both applicable and relevant to the assignment. The method and technique applied were found to be indicative of the market in the analyses of rental sites and as such, it is the reviewer's opinion that the methods and techniques used were sufficient to reasonably support the market rental opined for the intended use of the report.

Date of Review Report

September 1, 2015

Reliability of Value Conclusion as of the Date of Review Report

Overall, the work under review is deemed to be credible as of the date of this review report and may be relied on and used by Reclamation.

Conclusion

APPROVE

Reviewer's Certification

I certify that, to the best of my knowledge and belief:

- The statements of fact contained in this report are true and correct.
- The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions, and are my personal, impartial, and unbiased professional analyses, opinions, and conclusions of the appraiser.
- I have no present or prospective interest in the property that is the subject of this work under review and no personal interest with respect to the parties involved. Although the United States Department of the Interior is my employer, I am acting without prejudice towards that party.
- I have no bias with respect to the property that is the subject of this report or to the parties involved in this assignment.
- My engagement on this assignment was not contingent upon developing or reporting predetermined results.
- My compensation for completing this assignment is not contingent upon the development or reporting of predetermined assignment results or assignment results that favors the cause of the client, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal review.
- My analysis, opinions, and conclusions were developed and this review report was prepared in conformity with the Uniform Standards of Professional Appraisal Practice.
- I have performed no services, as an appraiser or in any other capacity, regarding the property that is the subject of the work under review within a three-year period immediately preceding acceptance of this assignment.
- No one provided me significant appraisal review assistance.
- I have not made a personal inspection of the subject of the work under review.
- I have not made a personal inspection of the comparables cited in the work under review.
- I have not verified the factual data presented in the work reviewed.
- As of the date of the report, I have completed the continuing education program of the Appraisal Institute.
- The use of this report is subject to the requirements of the Appraisal Institute relating to the review by its duly authorized representatives.
- The reported analyses, opinions, and conclusion were developed, and this report has been prepared in conformity with the requirements of the Code of Professional Ethics and Standards of Professional Practice of the Appraisal Institute.



September 1, 2015

Steven G. Murphy

Reviewer Qualifications

Steven G. Murphy

Professional Experience

- Review Appraiser, Office of Valuation Services - Department of the Interior
Reno, Nevada
May 2010 to Present
- Appraiser, Appraisal Services Directorate - Department of the Interior
Reno, Nevada
August 2004 to April 2010
- Manager, RERA Support - Bank of America, Real Estate Risk Assessment
Pleasant Hill, California
October 1998 to July 2004
- Manager, Quality Assurance & Audit - Bank of America, Commercial Appraisal Services
Pleasant Hill, California
April 1992 to September 1998
- Regional Manager, Southeast / Hawaii - Bank of America, Commercial Appraisal Services
Pleasant Hill, California
November 1996 to March 1998
- Regional Manager, Northern California & Nevada - Bank of America, Commercial Appraisal Services
Sacramento, California
March 1991 to March 1992
- Team Leader - Bank of New England Appraisal Department
Boston, Massachusetts
May 1990 to February 1991
- Appraiser, Various Appraisal Shops
Washington, DC, San Francisco, California, Medford, Oregon
July 1979 to April 1990

Licenses and Certifications

State License:

- Certified General Appraiser - Nevada (License No. A.0006037-CG)

Professional Certification:

- MAI, Appraisal Institute (No. 8324)

Education

Bachelor of Arts in Business Administration, Fort Lewis College, Durango, Colorado

STATEMENT OF WORK (SOW) Office of Valuation Services

Agency Case ID: [N/A]

IVIS Number: [R13018/00040312]

- Appraiser Instructions:**
1. Perform and complete a Market Rent Survey of residential/recreational lots similar to those located at the Shadehill Reservoir located in Perkins County, South Dakota. The survey should only consider the rental data of unimproved land. The rent survey will be used to aid the Bureau of Reclamation in determining a yearly fee for the seasonal recreational lots surrounding the Shadehill Reservoir. These lots are currently being managed by the Bureau of Reclamation of the Dept. of Interior, USA.
 2. The Office of Valuation Services review appraiser for this appraisal assignment will provide contacts for this assignment as needed.

SECTION 1 – SUBJECT IDENTIFICATION & GENERAL INFORMATION

Identification:	<i>Project Name</i>	Shadehill Unit, Cabin/Trailer Site Rent
	<i>Location</i>	Perkins County, South Dakota
	<i>Acreage</i>	3 acre or less sites
	<i>Number of Parcels</i>	60 mixed seasonal sites
	<i>Property Type</i>	Recreational/Residential Sites
	<i>Case Type</i>	Market Rent Survey

Client: U.S. Department of the Interior, Office of Valuation Services (OVS)

Intended Users: The market survey will be used by the Bureau of Reclamation on behalf of the United States of America.

Intended Use: The intended use of the analysis is to research the local rental market and report it in a summary manner. This data will assist the Bureau of Reclamation in determining a yearly use fee for the recreational sites surrounding the Shadehill Reservoir. It is not intended for any other use.

SECTION 2 – APPRAISAL REQUIREMENTS & INSTRUCTIONS

- Appraisal Standards:** Uniform Standards of Professional Appraisal Practice (USPAP).
- Extraordinary Assumptions:** None.
- Hypothetical Conditions:** None
- Jurisdictional Exceptions:** None
- Property Inspection:** The appraiser must inspect the subject property area and all of the market properties used in survey, unless the OVS Review Appraiser has approved other conditions in writing.
- This is a USPAP compliant report. The portions of USPAP that apply generally to appraisal practice include the DEFINITIONS, PREAMBLE, CONDUCT, MANAGEMENT, and CONFIDENTIALITY sections of the ETHIC RULE, the COMPETENCY RULE, and the JURISDICTIONAL EXCEPTION RULE. (USPAP: Advisory Opinion 21)
- The appraiser will be required to attend a pre-work meeting with the assigned OVS Review Appraiser, and/or other agency representative, and other interested parties.
- Controversies/Issues:** Should other controversies or issues be identified by the appraiser during the course of the assignment, the OVS Review Appraiser identified in Section 3 of this document must be immediately notified. The following issues have been identified:
- Legal Instructions:** None.

Special Appraisal Instructions:

1. The appraiser may not communicate assignment results to any party except OVS until authorized to do so in writing by OVS.
2. Any communication (verbal or written) with the Client Agency (Bureau of Reclamation) shall include the assigned OVS Review Appraiser.

General Appraisal Requirements & Instructions:

1. The appraiser must hold a valid license as a Certified General Appraiser for the jurisdiction in which the subject property is located. (Valid credentials include those obtained directly from the jurisdiction, those issued under a reciprocity agreement, and/or those characterized as “temporary” under the jurisdiction’s licensing and certification statutes.)
2. The OVS Statement of Work must be included within the Addenda to the appraisal report.
3. This appraisal assignment does not need to comply with UASFLA. It must conform to USPAP.
4. This is a market survey as directed under USPAP (AO 21).
5. Color photographs and maps of comparable properties shall be included in the appraisal report. OVS will accept aerial photographs for comparable properties, unless the aerial photographs do not accurately represent the property as of the date of inspection. The appraiser must photograph any unusual property features from the ground.
6. The report will be reviewed for compliance with the terms of this Statement of Work. Any findings of inadequacy will require clarification and/or correction.
7. The appraiser shall consider the Market Survey and all DOI internal documents furnished to the appraiser to be confidential. Refer all requests for information concerning the appraisal to the OVS Review Appraiser. While the public is not an intended user of the appraisal report, the Freedom of Information Act (FOIA) and Agency policy may result in the release of all or part of the appraisal report to others.
8. OVS will not normally accept custody of confidential information. Should appraiser find it necessary to rely on confidential information, he/she will contact the OVS Review Appraiser for instructions. The Review Appraiser will view the information and provide further instruction to the appraiser regarding handling and storage of the confidential information.
9. If including any proprietary information in the appraisal, appraiser must gain concurrence from OVS Review Appraiser and deliver the proprietary information in a separate binder.

SECTION 3 – PERFORMANCE & SUBMISSION REQUIREMENTS

The appraiser must address any questions regarding appraisal instructions and/or technical requirements for the appraisal to the OVS Review Appraiser. The contract award will identify the OVS Review Appraiser and his/her contact information.

The Target Period of Performance for the delivery of the initial appraisal report to the OVS Review Appraiser is 60 calendar days from the Date of Award. Contractors must provide the appraisal services within the performance period specified, and/or otherwise state an alternative Period of Performance with justification.

Deliverable/Task Schedule:

REQUIRED DELIVERABLES	DELIVERY DATE
Pre-Work Meeting	Not required
Initial Report	60 Days, or less
Review Period	15 Days
Final Market Survey	30 Days after Initial Report Delivery

Provided Subject Property Exhibits:

The following Subject Property Exhibits will be provided as attachments to the solicitation:

1. Sample market survey report
2. Location Map
3. Aerial Photo / Overlay
4. Copy of typical site permit