

Draft Business Plan for Sand Flats Recreation Area

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Introduction

The Sand Flats Recreation Area (SFRA) is located near Moab, Utah in the heart of the Colorado Plateau. Situated on a high plain of slickrock domes, bowls and fins, the Recreation Area rises in the east to meet the colorful mesas below the nearly 13,000-foot peaks of the Manti La Sal National Forest. Bordering the Recreation Area on the north and south are the canyons of the Negro Bill and Mill Creek Canyon Wilderness Study Areas. Further north lies the deep gorge of the Colorado River and Arches National Park.

The SFRA's Slickrock and Porcupine Rim mountain bike trails and almost 40 miles of jeep trails are world-renowned for their combination of challenge and awesome scenery. Along with easy access to biking and 4x4 trails, Sand Flats operates nine campgrounds with a total of 120 campsites. Approximately 125,000 visitors enjoy this 9,000-acre recreation area annually.

The SFRA's partnership between Grand County and the Bureau of Land Management (BLM) is unique. In 1995, in response to repeated health and resource violations, this area was developed through the collaborative efforts of the Moab community, AmeriCorps, Grand County and the BLM.

The SFRA has an entrance station where day use and camping fees are charged. The entrance station is staffed daily from mid-February through November. A self-service pay station is located at the entrance station for payment when the entrance station is closed. All funds collected are held by Grand County as part of the Cooperative Management Agreement (see appendix) between the BLM and Grand County to be used for recreation management in the area. Seasonal fee collection at the SFRA began in 1995 with the construction of a contact booth.

Management of the SFRA is addressed in the Moab Resource Management Plan (October 2008); the Sand Flats Recreation Area Management Plan; the Cooperative Management Agreement between U.S. Department of the Interior, BLM and Grand County, Utah; several notices in the Federal Register; and site specific plans and environmental documents. These documents provide for the establishment of fees, guide the level of development and type of facilities, and balance providing recreation opportunities with management of resource values.

The mission of the SFRA is:

“To ensure that the outstanding natural features of the area are protected from the adverse impacts of recreational use; provide sustainable public recreation opportunities consistent with the character and capability of the area; provide for public safety and reduction of visitor conflicts; assure the continuation of positive economic benefits to the County associated with public use of the area; and maintain reasonable public access to the area for recreational and other sustainable uses.”

The Sand Flats Management Plan identifies the following management objectives:

- To provide for a recreational “mix” of opportunities necessary to meet a variety of visitor expectations, while maintaining the relative natural characteristics of the area;
- To maintain wilderness values in adjacent Wilderness Study Areas;
- To prevent degradation of the natural values in the planning area and provide for restoration of areas where vegetation and soils have been damaged by recreational use; and
- To provide for public health and safety.

Self-sustainability

The SFRA is managed as a self-sustaining entity in partnership between Grand County and the BLM-Moab Field Office. The SFRA is managed through the Cooperative Management Agreement between the BLM and Grand County which states the following:

“Both the BLM and Grand County acknowledge the importance of maintaining the intrinsic qualities of the area and the need to manage recreational use of the area in a sustainable manner.

Through this Agreement, the BLM and Grand County seek to improve public service, provide for sanitary conditions, provide for public safety, remove litter, provide, maintain, repair, and replace recreation facilities, conduct environmental education and interpretive programs, prevent environmental degradation, maintain essential transportation routes, and provide parking facilities.”

Both the BLM and Grand County aspire to:

“.....utilize their combined resources and authorities to cooperatively improve conditions within the area so as to better serve the public and establish a mechanism whereby users of the area fund management, protection, and service expenditures.”

Under Responsibilities and Provisions:

Grand County agrees to:

“administer and operate a program to collect a SFRA Protection and Maintenance Fee ... and deposit such fees into the SFRA Maintenance and Protection Fund (Fund) established by the Grand County Clerk subject to the following:

- all County costs for initiating and operating the program and related services shall be covered by the Fund,
- initiation and operation of the fee program shall not obligate Grand County to expend any funds beyond those likely to be available from the Fund,

It is mutually agreed and understood by and between said parties that:

“the revenue generated from the fee program and deposited by the County in the SFRA Maintenance and Protection Fund shall be expended to pay costs for the following activities:

- entrance station operation and fee collection, including fee permit printing and distribution and public information items as outlined in the Annual Operating Plan,
- annual and recurring maintenance and protection operations as outlined in the Annual Operating Plan,
- recreation site rehabilitation, improvement, replacement, and construction as outlined in the Annual Operating Plan, and
- any county-incurred administrative, legal operational costs including, but not limited to, road maintenance, financial reports, signs, notices, judgments, claims and salaries.”

The Slickrock Bike Trail, the centerpiece of the SFRA, has been designated a National Recreation Trail. The SFRA is managed as a Destination SRMA. Beneficial outcomes being targeted for this SRMA are improved skills for outdoor enjoyment and physical activity, greater sense of adventure, increased local tourism revenue, greater freedom from urban living and greater family bonding.

Fee collection began in the spring of 1995. The proposed fee change would begin in the fall of 2015.

Visitor Profile

In 2014, the estimated number of visitors to the SFRA (generated from fee collection data) was 115,500 visitors. Of these visitors, over 64,000 entered for day use by personal vehicle; 5,200 entered by bicycle, motorcycle or shuttle; and over 46,000 camped.

The above statistics are generated from fee revenues and do not include any Special Recreation Permit data from the BLM. Special Recreation Permits include commercial use and organized group/event; statistics generated from these additional BLM permitted activities would place visitation numbers at approximately 125,000 visitors annually.

The SFRA conducted a visitor use survey in 2008 and in spring 2009. Based on these surveys, a third of visitors are from northern Utah; a third are from Colorado; and of the last third, half live west of the Rocky Mountains (apart from Utah and Colorado), and half live east of the Rocky Mountains. SFRA visitors also visit additional Moab areas including other BLM lands and the area’s National Parks.

Moab residents use the SFRA for day use activities. Many purchase an annual pass and hike or walk their dogs on the SFRA trails, especially in the winter months.

Based on most recent user surveys, just over half of SFRA visitors come to mountain bike the Slickrock and Porcupine Rim bike trails. Ten percent come to hike the SFRA area. Motorized recreation has increased dramatically in the last few years. Over a third of the visitors come to SFRA to engage in motorized activities, including 4x4 driving or utility-type vehicle (UTV) driving (Hell’s Revenge and Fins and Things jeep routes) and riding motorcycles on the Slickrock Bike Trail.

Visitors to SFRA run the gamut from young to old, including small to large groups of friends; extended families; church groups; scouting groups; jeep clubs; retired folks; families camping in recreational vehicles (RV); and college age visitors camping in tents.

Over 99% of campers are non-local. They base themselves out of the SFRA, use SFRA facilities and trails but also visit other Moab areas.

Spring is the busiest season, followed by fall, summer and winter. Peak use occurs in April and May. SFRA is popular with spring break college students seeking sunlight and warm weather along with spring break family groups with young children.

SFRA 2014 visitation increased 10% over 2013. To date, 2015 visitation is 10% over 2014 visitation through June. Nearby Arches National Park visitation is up 9% this year over 2014.

Table 1. Sand Flats Recreation Area Estimated 5 Year Average Visitation

Month	2010	2011	2012	2013	2014	5 Year Average Visitation
JAN	394	577	730	322	704	545
FEB	525	902	1,346	888	1,256	983
MAR	12,034	11,778	14,148	16,135	16,411	14,101
APR	23,307	22,946	23,126	20,808	24,991	23,036
MAY	19,416	21,211	17,810	19,362	21,614	19,883
JUNE	6,006	8,484	5,649	6,420	7,877	6,887
JULY	1,364	3,282	2,245	2,556	2,829	2,455
AUG	2,118	1,982	2,578	3,416	4,583	2,935
SEPT	7,800	8,056	8,321	8,553	9,156	8,377
OCT	15,243	16,204	15,554	18,629	18,585	16,843
NOV	4,186	4,830	5,804	7,204	6,904	5,786
DEC	348	591	409	275	588	442
TOTAL	92,741	100,843	97,720	104,568	115,498	102,274

Federal Lands Recreation Enhancement Act Analysis

Section 3(a) of the Federal Lands Recreation Enhancement Act of 2004 (REA) provides the authority for establishing, modifying, charging and collecting recreation fees on Federal recreational lands and waters. Section 3(b) provides that recreation fees shall be established consistent with the six criteria discussed below which forms the basis for this analysis.

1) Consideration of the fee being commensurate with the benefits and services provided to the visitor

Federal lands near Moab are a major recreation destination. Public lands, because of their large number of acres and modest fees, continue to make it possible for many visitors to enjoy relatively inexpensive trips to the Moab area. The public considers SFRA to be a good value as visitation from 2009 through 2014 has grown by 23% and visitation and corresponding revenue to date for 2015 is up 10% over last year.

The perception of relative value would generally continue after the proposed rate increase as SFRA would still be comparable to fees for nearby public lands (see Table 2. Consideration of comparable fees charged by nearby public land agencies and nearby private sector operators).

SFRA fee revenue provides all staffing, services and maintenance at SFRA. Services include staffing the entrance station daily from mid-February to November; daily patrols of front country areas including checking for compliance in 116 individual campsites, two group sites, and two overflow camping areas; and maintaining facilities including fire rings and picnic tables at these campsites. Daily patrols also entail checking and maintaining facilities at five trailheads. Services also include, at a minimum, bi-weekly backcountry trail patrols and the maintenance of some 40 miles of trails, 27 information boards and kiosk displays. These facilities are maintained and damaged facilities repaired and improved. SFRA fee monies pay for toilet cleaning and pumping services for 22 toilets as well as removal of trash and recycling materials. Routine cleaning includes campground maintenance and picking up loose trash. Staff members also regularly maintain fences as well as barriers and signs.

Major service costs include labor and benefits for a three to ten person staff (depending on season); routine contract cleaning, pumping and disposal of toilet vault waste; maintenance equipment and materials; contract trash dumpster service; maintenance vehicles; fuel costs; and printing of brochures, maps and fee collection materials.

2) Consideration of the aggregate effect of recreation fees on recreation users and service providers

Approximately 49% of the SFRA visitors would not see an increase in fees under this proposal.

The SFRA does not charge a day use fee for any vehicle driving through the recreation area on the county road. The SFRA also holds volunteer days in the spring and fall and anyone willing to volunteer for four hours is awarded an annual pass.

The proposed rate changes for camping represent an increase of 50% in fees when fully implemented. The trailer fee would increase by 150% when fully implemented. The annual pass fee would increase by 25% when fully implemented.

While the percentage increases may seem relatively high at first glance, fees for camping have not been increased since 2006 and the trailer fee has not changed since 2009. The annual pass fee has remained the same since 1998. Approval of the proposed rate increases would make the fees for SFRA sites more comparable to those charged by other public land agencies in the Moab area.

3) Consideration of comparable fees charged elsewhere and by other public land agencies and by nearby private sector operators

Table 2 compares current Sand Flats Day Use and Camping fees with those charged by other nearby public agency providers and private sector operators. The chart shows that SFRA fees are lower than those charged by other public agencies and nearby private sector operators.

4) Consideration of public policy or management objectives served by the recreation fee

The SFRA facilities were established to provide reasonable recreation opportunities for the use of the public lands near Moab. As visitation and utilization rise, certain variable costs for servicing the area such as trail maintenance including trailhead toilet facilities and trash removal, marking, maintaining and patrolling trails and entrance station staffing increase proportionally. Additionally, more use results in increased deterioration of parking areas and facilities so that they require more frequent corrective maintenance or replacement. Increased visitation has also increased demand for additional facilities, especially for camping. The Federal Land Recreation Enhancement Act was enacted, in part, to provide

additional financial resources to the land management agencies for site maintenance and operations. As described below, it is BLM policy to maintain recreation sites in good condition to enhance public enjoyment and to provide services at fair market value.

The BLM recreation program policy and management objectives for the recreation program are described in “BLM’s Priorities for Recreation and Visitor Services”. The guidelines relevant to campground and day use sites include goals pertaining to providing quality recreation experiences on public lands and receiving fair value for services rendered.

Goal 2: Ensure a Quality Experience and Enjoyment of Natural and Cultural Resources on DOI Managed or partnered Lands and Waters.

Objective 3: Ensure public health and safety, and improve the condition and accessibility of recreation sites and facilities.

Milestone 3: Manage and maintain recreation sites and facilities to acceptable operational standards, with priority given to reducing the backlog of identified deferred maintenance projects.

Actions: 1. Improve annual maintenance capabilities at developed recreation sites to reduce the backlog of deferred maintenance projects.

Goal 3: Provide for and Receive Fair Value in Recreation (DOI Draft End Outcome Goal REO.3)

Objective 1: Provide fair value and return for recreation through fee collection and commercial services.

As part of the Cooperative Management Agreement between the BLM and Grand County, all funds collected are held by Grand County to be used for recreation management in the area. Under REA, fees collected are used for repair, maintenance, and facility enhancement related to visitor enjoyment, visitor access, and health and safety; interpretation, visitor information, visitor service, visitor needs assessments, and signs; habitat restoration directly related to wildlife-dependent recreation; law enforcement; direct operating or capital costs associated with the recreation fee program; and a fee management agreement or a visitor reservation service. The SFRA is self-sustaining and recreation fees pay all operating costs.

5) Consideration of input from a recreation resource advisory council

Under REA, the BLM consults with the Utah Recreation Resource Advisory Council (RAC) when implementing an expanded amenity fee or establishing a specific recreation fee site, eliminating an expanded amenity fee, or expanding or limiting the recreation fee program. Grand County operates SFRA in partnership with the BLM-Moab Field Office. In April of 2008, the Grand County Council approved Amendment 3 regarding the Cooperative Management Agreement between the BLM and Grand County Providing for Public Safety, Resource Protection and Recreation Management and Maintenance in the SFRA. The amendment added more recent authority – the Federal Lands Recreation Enhancement Act of 2004 – to the Cooperative Management Agreement.

At its June 9, 2006 meeting, the Utah RAC elected to function as the Recreation RAC for both BLM-Utah and national forest offices in Utah. The SFRA plans to present its proposal for fee increases to the Utah Recreation RAC at the earliest opportunity.

6) Consideration of such other factors or criteria as determined appropriate

The 2012 Condition Assessment Team ranked the overall condition and maintenance levels of the SFRA facilities as good with the exception of Campgrounds B, C, and D. These campgrounds were recently transferred to BLM ownership as part of the Utah Recreational Land Exchange, May 2014. This year's Five Year Deferred Maintenance Plan for the BLM Canyon Country District scheduled a Sand Flats Campground renovation for FY-2019 and FY-2020. Campground B renovations will be completed during summer 2015. Sand Flats will contribute \$50,000 in funding to these renovations.

Description of How the Public Will Be Informed of Fee Expenditures

The SFRA is managed by Grand County in partnership with the BLM –Moab Field Office. The SFRA budget is a part of the Grand County budget which is adopted by the Grand County Council through a public process which includes public meetings and public hearings. The SFRA manager and the Grand County Clerk ensure that the fund expenditures in the SFRA budget are in accordance with the adopted budget.

Fees expended will be reported annually to visitors by posting the percentage and dollar amounts of total expenditures by major category, i.e., annual operations, deferred maintenance, capital improvements, etc. Fees collected will also be displayed.

The attached Comparison Table displays current SFRA day use and camping fees with those charged by other nearby public land agencies and private sector operators. The chart shows that SFRA fees are lower than those charged by others in the area. Arches and Canyonlands have proposed a 100-200% fee increase for day use and a 25-50% increase for camping depending on category. Arches and Canyonlands have not yet set a date when these fee increases will go into effect.

Table 2. Consideration of comparable fees charged elsewhere by other public agencies and by nearby private sector operators.

Name	Day Use Rates	Camping Rates	Amenities
Arches National Park	\$10/ vehicle entry fee for 7 days; \$5/ bicycle, motorcycle fee for 7 days; \$25/ local annual pass for parks in Southeast Utah Group	\$20/ site per night up to 2 vehicles plus Day Use Fee; Group site, \$3 per person with minimum number occupants paid, \$9 reservation fee	Picnic tables, drinking water, access road, fee collection, LE, trash container, toilets, fire rings
Canyonlands National Park	\$10/vehicle entry fee for 7 days; \$5/ bicycle fee for 7 days; \$25 local annual pass for parks in Southeast Utah Group	\$15/ site per night up to 2 vehicles plus Day Use Fee; Group site, \$3 per person with minimum number occupants paid, \$30 reservation fee	Picnic tables, drinking water, access road, fee collection, LE, trash container, toilets, fire rings
Dead Horse Point State Park	\$10/ vehicle entry fee per day, annual pass to all Utah State Parks \$75	\$28/ vehicle per night; second vehicle is \$14. Discount of \$2 per night with annual pass to all Utah State Parks	Picnic tables, drinking water, access road, fee collection, LE, trash container, toilets, fire rings
BLM-Moab	None	\$15/ site per night	Picnic tables, access road, fee collection, LE, trash container, toilets, fire rings
Sand Flats Recreation Area	\$5/ vehicle for 1 day or \$10/ for 7 days; \$2/ bicycle, shuttle, motorcycle entry fee for 1 day or \$5/ for 7 days; annual pass \$20, utility trailer fee \$2	\$10/ vehicle per night; Group campsite, \$50 for 11-16 persons, \$10 reservation fee	Picnic tables, access road, fee collection, LE, trash container, toilets, fire rings, interpretive signs/kiosks.
Nearby Private Sector Operators		\$26- \$43/ site per night	Picnic tables, drinking water, access road, fee collection, LE, trash container, toilets, fire rings

Proposed Modifications to Recreation Fee Rates

The cost of providing services at the SFRA has increased steadily since the current rates were established. Visitation has increased 23% over the last 5 years. More use results in increased deterioration of roads, trails and facilities.

Comparing SFRA fees and amenities with fees charged by nearby public land agencies and nearby private sector operators, SFRA fees are lower for similar amenities.

The SFRA proposes to increase day use and overnight camping fees for the public's use of the SFRA facilities, equipment, or services related to outdoor recreation. Pursuant to REA and the implementing regulations at 43 CFR 2933, fees may be charged for individual or group recreational use in areas where specific amenities and services are provided. Under Section 803(f)(4) and Section 803(g)(2)(A) respectively, the SFRA day-use and overnight camping sites qualify as locations where visitors can be charged a standard amenity recreation fee and/or an expanded amenity recreation fee.

The SFRA current day use rates are \$5.00 per vehicle for one day; \$10.00 per vehicle for seven days; \$2.00 per bicycle, shuttle or motorcycle for one day; or \$5.00 per bicycle, shuttle or motorcycle for seven days. The day use fee for a utility trailer is \$2.00. The annual pass rate is \$20.00. Camping is \$10.00 per vehicle per night for up to 5 people and \$2.00 for each additional person. Group campsites are \$50.00 per night for 11-16 people with a \$10.00 reservation fee. Campers currently do not pay the day use fee.

The SFRA current schedule was last amended in 2009. At that time a change was made to the day use fee, and a utility trailer fee was added. Camping rates have remained the same since 2006. The annual pass fee has not changed since 1998.

The SFRA recommends that the camping fee be changed from \$10.00 per vehicle, to \$15.00 per vehicle per night. The utility trailer fee would be changed from \$2.00, to \$5.00 per trailer. The annual pass fee of \$20.00 would be changed to \$25.00. The group campsite rates would be increased from \$50.00 to \$70.00 to correspond to individual camping fee changes and increased costs in administering the reservation system. See Table 3. SFRA Proposed Rate Changes.

The proposed fees were considered and approved by the SFRA Stewardship Committee at their December 2014 and March 2015 meetings, and by the Grand County Council at their July 2015 meeting.

Assuming stable use by campers and day use visitors, these rate changes would produce approximately \$115,000 per year in additional annual revenue for the SFRA program when fully implemented. These fees would be used for needed additional staffing, to help meet the demand for new facility development, and maintenance of existing facilities.

The SFRA proposes to increase the recreation fee rates that may be charged for recreation facilities and services.

Table 3. SFRA Proposed Rate Changes

Site Type or Service	Description	Current Rate	Proposed Rate
Campground	Fee for camping in developed campsites	\$10.00 per vehicle	\$15.00 per vehicle
Day Use per Towed Vehicle	Fee for day use	\$2.00	\$5.00
Annual Pass	Fee for an annual pass for day use	\$20.00	\$25.00
Group Site Reservation (Non-transferable and Non-refundable)	Fee to make a reservation	\$10.00	\$20.00
Group Site	Fee for camping in group campsite	\$50.00	\$70.00
Day Use for 4-wheeled Vehicle (No Change)	Fee for day use	\$5.00 for 1 day or \$10 for 7 days	\$5.00 for 1 day or \$10 for 7 days
Day Use Per Person by Shuttle, Bicycle or Motorcycle (No Change)	Fee for day use	\$2.00 for 1 day or 5.00 for 7 days	\$2.00 for 1 day or \$5.00 for 7 days

Operating Costs

The cost of providing services has increased steadily since the current rates were established. From 2012 to 2014, wages have increased by 12% and benefits by 26%. Wages can be divided into approximately one fourth each for time spent on fee collection, patrol, maintenance and administration. Toilet pumping and waste disposal costs have increased by 13%. Trash and recycling service costs have increased by 57%. Substantial trailhead improvements have been made to compensate for increased use. See Table 4. Total Expenditures and Revenue 2012-2014 and Budget 2015.

New construction atypical to annual operating budget

In 2009, the SFRA constructed a 20,000 square foot paved trailer parking area at the Hell's Revenge Trailhead, installed two toilets, an educational kiosk display and signs. The total project cost was \$127,000 and was paid for with collected recreation fees and a matching Utah State Parks Recreational Trails Program grant. The BLM contributed planning, NEPA analysis, heavy equipment and labor for toilet installation.

In 2010, Sand Flats constructed a new entrance station with Sand Flats fee monies. Total project costs were \$51,000.

In 2011, the Slickrock Trailhead Improvement project was completed; four toilet buildings were repaired and painted, an interpretive pavilion was built, and eight new kiosk displays were added. Sand Flats fees and a matching Utah State Parks Recreational Trails Program grant paid for this \$16,000 project.

In 2013, the SFRA obtained some 500 large boulders valued at approximately \$60,000 for under \$10,000 in hauling fees. Boulders were placed by the BLM with SFRA oversight in campgrounds and stockpiled for Fins and Things Trailhead and future campground expansion.

In 2014, an important dinosaur track site along the popular Hell's Revenge Trail was protected with boulders and interpretive signs added. The SFRA constructed a 36,000 square foot graveled parking area for the Fins and Things trail with two toilets, signs, parking barriers and an educational kiosk display. This \$78,841 project was made possible with a matching grant from a Utah State Parks Recreational Trails Program, Sand Flats fees, BLM planning assistance, donation of gravel and of heavy equipment time and labor for toilet installation. In 2014, the SFRA also seal coated and striped the Hell's Revenge 20,000 square foot parking lot.

Deferred maintenance projects

Substantial expenditures are planned for near term site improvement projects. These will include upgrading and adding campsites to three campgrounds. This year's Five Year Deferred Maintenance Plan for the BLM Canyon Country District scheduled Sand Flats campground renovation for FY-2019 and FY-2020. Except for the addition of the Juniper Campground in 2004, the SFRA has not made major improvements to campground facilities since the SFRA campgrounds were created under the AmeriCorps program in 1996. Sand Flats has committed \$50,000 in matching funds to these projects.

Other planned improvements include crack sealing and sealcoating the 200 space parking lot at Slickrock Bike Trail; this project is estimated to cost \$25,000.

Table 4. Total Expenditures and Revenue 2012-2014 and Budget 2015 (in dollars)

Categories	SFRA Expenditures in 2012	SFRA Expenditures in 2013	SFRA Expenditures in 2014	SFRA Budget 2015
Salaries	142,452	138,280	155,055	174,696
Overtime	30	367	241	500
Benefits/Health insurance	58,991	66,173	74,578	82,228
Travel	0	0	0	250
Office supplies & equipment	1,500	1,513	2,406	1,500
Vehicle maintenance	965	2,149	3,548	2,000
Building & Grounds maint.	1,222	723	158	1,500
Utilities - gas, power, phone	3,545	3,408	4,077	4,000
Trust Land Fees	20,977	22,492	7,024	0
Contract professional services	341	1,676	2,014	500
Contract services - toilets	27,226	29,775	30,814	32,000
Accounting fees	5,000	5,000	5,000	5,000
Search and Rescue fund	10,000	10,000	10,000	10,000
Discretionary fund	305	400	400	500
Slickrock Trail dumping fees	3,772	4,294	5,941	5,500
Fuel	4,635	2,786	4,147	3,000
Uniforms	832	940	1,177	1,000
Printing and publishing	10,386	6,736	9,984	7,500
Insurance	780	766	779	800
Supplies & equipment	7,365	14,971	7,714	7,500
Capital improvements	0	0	4,822	10,000
Capital Equipment	0	0	11,431	0
Inventory office	1,016	4,216	0	0
Inventory tools	5,018	459	983	500
Campground host	0	1,679	850	1,800
Fins and Things Improvement Project	538	0	78,841	0
Staff training	365	333	245	1,000
Total Expenses	307,261	319,136	422,229	353,274
Fee Revenue	318,769	342,312	375,527	
Utah State Parks Grant Contribution			38,170	
Youth Initiative Grand	10,000		8,500	
Interest	470	328	798	
Total	329,239	342,640	422,995	

Revenues

Table 5 and Figure 1 below show SFRA monthly revenue totals in dollars from 2009-2014 with percentage of change and averages over this period. Revenues and visitation have increased steadily. Table 6 shows projected annual revenues if fees were modified.

Table 5. Sand Flats Recreation Area Revenue 2009-2014

Month	Annual Remit Totals by Month						% of Change					Average
	2009	2010	2011	2012	2013	2014	10	11	12	13	14	10-14*
JAN	1,226	1,197	1,819	2,390	1,289	2,606	-2	52	31	46	102	1,860
FEB	4,608	1,521	2,390	4,128	2,781	4,087	67	57	73	33	47	2,981
MAR	41,801	39,732	38,588	46,162	51,913	53,500	-5	-3	20	12	3	45,979
APR	69,306	75,823	75,079	76,039	70,418	80,361	9	-1	1	-7	14	75,544
MAY	54,994	63,721	70,090	59,427	63,905	70,818	16	10	15	8	11	65,592
JUNE	21,387	19,539	28,838	17,596	20,343	25,011	-9	48	39	16	23	22,265
JULY	6,968	4,283	10,331	6,918	7,725	8,479	39	141	33	12	10	7,547
AUG	7,198	6,957	6,232	8,200	11,145	14,904	-3	-10	32	36	34	9,488
SEPT	24,422	25,326	26,846	26,931	27,896	30,334	4	6	0	4	9	27,467
OCT	49,587	50,650	54,436	52,224	61,640	62,406	2	7	-4	18	1	56,271
NOV	16,186	12,780	14,302	17,503	21,807	21,243	21	12	22	25	-3	17,527
DEC	601	1,064	1,812	1,169	1,034	1,778	77	70	35	12	72	1,371
TOTAL	298,284	302,593	330,763	318,687	341,896	375,527	1%	9%	4%	7%	10%	333,893

Figure 1. Sand Flats Recreation Area Revenue 2009-2014 Graph

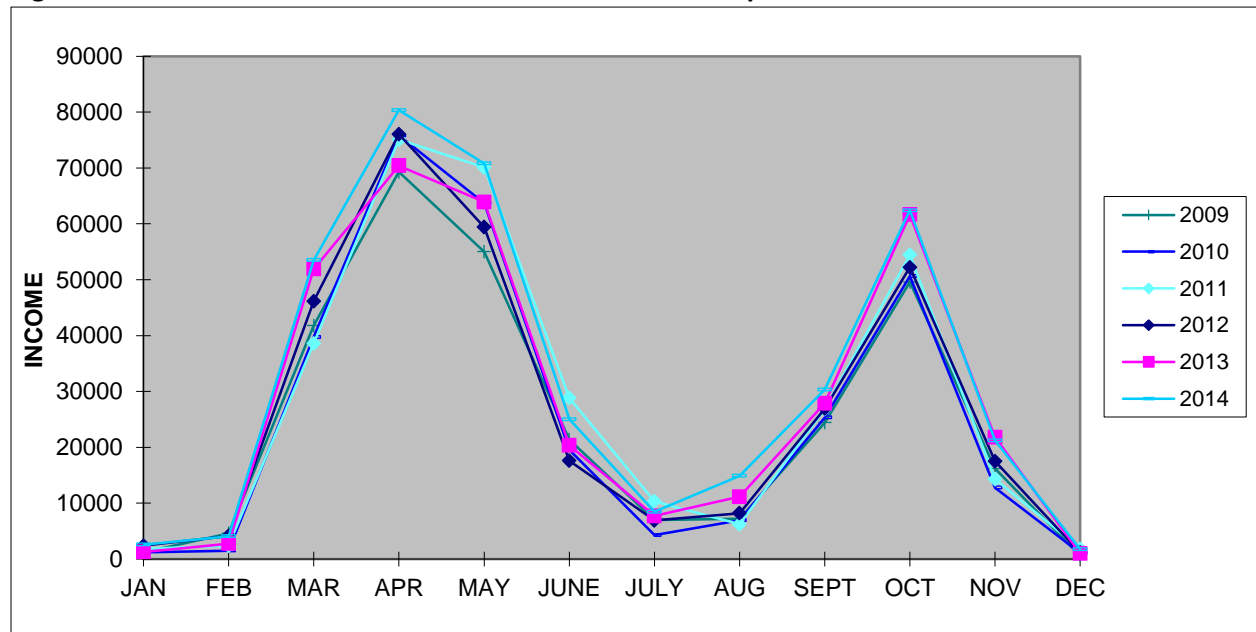


Table 6. Projected Annual Revenues If Fees Are Modified

SFRA Proposed Rates and Projected Revenues, Summary Table				
Remit Totals	2014	Proposed Rate Change	Estimated Additional Fees	Total
Camping	\$190,650	From \$10 to \$15 per vehicle per night with up to 5 people, additional persons \$2 each	\$95,325	\$285,975
Trailer	\$6,390	From \$2 to \$5 per utility trailer	\$9,585	\$15,975
Annual pass	\$14,360	\$25 each	\$3,590	\$17,950
Group sites	\$10,550	From \$50 night to \$70 night	\$4,220	\$14,770
Group site reservations	\$700	From \$10 to \$20 reservation	\$700	\$1,400
Day Use for 4-wheeled Vehicle	\$142,045	(No Change)		
Day Use Per Person by Shuttle, Bicycle or Motorcycle	\$10,832	(No Change)		
Total Revenue	\$375,527		\$113,422	\$488,949

Priorities of Future Expenditures

Expenditures critical to operation

SFRA fee revenue annually provides all staffing, services and maintenance at the SFRA. Services include staffing the entrance station daily from mid-February to November; daily patrols of front country areas, including checking for compliance in 116 individual campsites, two group sites and two overflow camping areas; and maintaining facilities including fire rings and picnic tables at these campsites. Daily patrols also include checking and maintaining facilities at five trailheads. Services also include at, a minimum, bi-weekly backcountry trail patrols and the maintenance of approximately 40 miles of trails, 27 information boards and kiosk displays. SFRA fee monies pay for toilet cleaning and pumping services for 22 toilets, as well as removal of trash and recycling materials. Routine cleaning includes campground

maintenance and picking up loose trash. Staff members also regularly maintain fences, barriers and signs.

Major service costs include labor and benefits for a three to ten person staff; routine contract cleaning, pumping and disposal of toilet vault waste; maintenance equipment and materials; contract trash dumpster service; maintenance vehicle and fuel costs; and printing of brochures, maps and fee collection materials.

Identify cost estimates for major new investments for service facility enhancement, expansion, and construction

The fee change proposal would make funds more readily available to address some short and long term maintenance and improvement needs. These include:

- Upgrading and adding campsites to three campgrounds. This year's Five Year Deferred Maintenance Plan for the BLM-Canyon Country District scheduled the Sand Flats campground renovation for FY-2019 and FY-2020. Except for the addition of the Juniper Campground in 2004, the SFRA has not made major improvements to campground facilities since the SFRA campgrounds were created under the AmeriCorps program in 1996. Sand Flats has committed \$50,000 in matching funds to these projects.
- Upgrading two group campsites by adding shade structures and tent pads for approximately \$32,000.
- Constructing an additional 50 site campground to help meet demand for additional camping opportunities on public lands, approximately \$225,000
- Crack sealing and sealcoating the 200 space parking lot at Slickrock Bike Trail, estimated at \$25,000.
- Two new patrol trucks to replace 2003 trucks, approximately \$40,000 each.
- Building up a matching fund balance to pave two miles of the Sand Flats road, including bike paths; this project is estimated at \$500,000 to 1 million dollars per mile. County would match 6.7% or \$134,000.
- On-going trail-side restoration work and trail improvements along approximately 16 miles of 4x4 trails. SFRA will apply for Utah State Parks Recreational Trails matching grant for approximately \$80,000 in 2016.

Fund Balance

It is critical to maintain a positive fund balance so that the SFRA can provide required services, quickly address threats to public health and safety, and allocate some revenue for future investments in recreation area infrastructure. At current expenditures, the SFRA has determined that a minimum annual balance of approximately \$80,000 to \$100,000 should be maintained to ensure program continuity. Additional balance will be needed to fund the projects listed above. In fact, the balance will fluctuate as it is allowed to build up to fund projects and then drop as projects are completed. The Projected SFRA fund balance at the end of 2015 is \$175,000.

In summary, the fee rates proposed in this business plan would provide the SFRA with long-term sustainability and continuity of operations. The program would have the ability to fund improvements when necessary, as well as afford costly and unplanned emergency expenses. See Table 7 below.

Table 7. Projected Revenues, Budget and Fund Balances if Fees are Modified

Categories	2016	2017	2018	2019	2020
Salaries	194,220	199,126	203,188	209,180	212,645
Overtime	500	500	500	500	500
Benefits	86,122	94,722	103,943	115,236	127,562
Travel	250	250	250	250	250
Office supplies & equipment	1,700	1,700	1,700	1,700	1,700
Vehicle maintenance parts	2,250	2,250	2,250	2,500	2,500
Building & Grounds maint.	1,500	1,500	1,500	1,500	1,500
Utilities - gas, power, phone	4,500	5,000	5,000	5,500	5,500
Contract professional services	1,100	1,100	1,100	1,100	1,100
Contract services - toilets	34,000	34,000	34,000	36,150	37,300
Accounting fees	5,000	5,000	5,000	5,000	5,000
Search and Rescue fund	10,000	10,000	10,000	10,000	10,000
Discretionary fund	500	500	500	500	500
Slickrock Trail dumping fees	6,600	7,200	7,200	7,900	7,900
Fuel	4,000	4,000	4,400	4,400	4,400
Uniforms	1,200	1,200	1,500	1,500	1,500
Printing & publish (bulk print every other year)	10,000	7,500	10,500	8,000	11,000
Insurance	800	800	800	800	800
Supplies & equipment	8,000	8,000	8,500	9,000	9,500
Capital improvements*	25,000	32,000		25,000	25,000
Capital Equipment- patrol vehicles	40,000	0	0	40,000	0
Inventory office	1,000	1,000	1,000	1,000	1,000
Inventory tools	1,000	1,000	1,000	1,000	1,000
Campground hosts	1,800	1,800	1,800	2,700	2,700
Staff training	1,000	1,000	1,000	1,000	1,000
SFRA match for paving Sand Flats Rd				134,000	
SFRA match for Trail Improvements			40,000		
Projected Total Expenses	442,042	421,148	446,631	625,416	471,857
Fund Balance at Beginning of Year	175,000	220,958	287,810	329,179	191,763
2014 Total Revenue	375,000	375,000	375,000	375,000	375,000
Projected Additional Revenue with Fee Change	113,000	113,000	113,000	113,000	113,000
Projected Total Funds with Fee Change	663,000	708,958	775,810	817,179	679,763
Fund Balance at End of Year	220,958	287,810	329,179	191,763	207,906

***Capital Improvements- 2016 Slickrock parking lot repair; 2017 group site improvements; 2019 and 2020 campground improvements**

Analysis of Recreation Fee Rates

BLM policy authorizes the use of either a cost-recovery or fair market calculation method to analyze proposed fee rates. The SFRA is using both methods to support the need to increase fees at its sites.

Cost Recovery Fee Calculation Method:

The SFRA is a self –sustaining entity and has been for the last 15 years with all operating costs paid for by SFRA fee revenues. See Table 4. Total Expenditures and Revenue 2012-2014 and Budget 2015.

The bulk of the additional fees proposed will go toward offsetting rising operational expenses necessary to maintain existing levels of service to Sand Flats visitors while providing for some additional facilities. The cost of providing services has increased steadily since the current rates were established. From 2012 through 2014, wages have increased by 12% and benefits by 26%. Wages can be divided into approximately one fourth each for time spent on fee collection, patrol, maintenance and administration. Toilet pumping and waste disposal costs have increased by 13%. Trash and recycling service costs have increased by 57%. Substantial trailhead improvements have been made to compensate for increased use.

See above for proposed major new investments for service facility enhancement, expansion, construction and associated costs.

Fair Market Value Fee Calculation Method:

See Table 2. Consideration of comparable fees charged elsewhere by other public agencies and by nearby private sector operators. The comparison table shows that the SFRA fees are lower than those charged by other public land agencies and nearby private sector operators. Sand Flats would be able to meet its commitment of \$50,000 matching funds to needed upgrades in three campgrounds with the fee rate change without an impact to existing services.

Impacts from Changing and Not-Changing Recreation Fee Rates

Anticipated results of Fee Increase proposal

The SFRA fee increase proposal would allow Sand Flats to continue to pay for existing labor and operating costs and to maintain amenities offering great visitor service and satisfaction. Fee increases are modest and, if implemented, would be comparable with BLM-Moab's recreation fee rates.

Anticipated results of not modifying fee rates

If the SFRA fee increase proposal was not implemented, visitors would eventually see a reduction in services which would negatively impact the SFRA visitor experience and create negative impacts on the environment. In addition, the safety of the visitor (in terms of clean toilets and other items) would be lessened if services could not be maintained.

Public Outreach

Draft business plans must be made available for public review and comment for a minimum of 30 days. Public outreach on the *Draft Business Plan for Sand Flats Recreation Area* will be solicited for 30 days from August 6 to September 6, 2015. A copy of the draft business plan will be available at the BLM-Moab Field Office and posted online at: <http://www.blm.gov/ut/st/en/fo/moab.html>.

Prior to increasing fees, the BLM-Moab and Grand County will be conducting the following outreach efforts to notify the public of its opportunity to review and comment on the draft business plan:

- Posting an announcement at the SFRA entrance station and on all recreation area kiosks
- Issuing a news release to statewide print and broadcast media
- Posting the draft business plan on the BLM-Moab and Grand County websites
- Preparing an information sheet to be distributed from the BLM-Moab Field Office to persons requesting information about the proposed fees
- Facilitating two public meetings, hosted by the Sand Flats Stewardship Committee and the Grand County Council

In addition, the SFRA will be presenting the fee proposals to the BLM Utah Recreation RAC for its formal review. The Utah RAC is a 15-member advisory panel which provides advice and recommendations to the BLM on resource and land management issues for 22.9 million acres of public lands in Utah. The REA mandates that the appropriate Recreation RAC review all BLM recreation fee proposals prior to approval. Comments from both the public at large and the BLM Utah RAC will be considered by the Grand County Council prior to approval of the proposed fees, as part of the Grand County Fee Schedule Ordinance process.

Appendix

Sand Flats Recreation Area Cooperative Management Agreement

COOPERATIVE MANAGEMENT AGREEMENT

BETWEEN

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

AND

GRAND COUNTY, UTAH

PROVIDING FOR PUBLIC SAFETY, RESOURCE PROTECTION,
AND RECREATION MANAGEMENT AND MAINTENANCE
IN THE SAND FLATS RECREATION AREA

PREAMBLE

The Sand Flats Recreation Area (see attached map), located along the Sand Flats Road east of Moab, is recognized as a local, national, and international recreation destination due to its combination of recreation opportunities and scenic values. Both the United States Department of the Interior, Bureau of Land Management (BLM) and Grand County, Utah (Grand County) acknowledge the importance of maintaining the intrinsic qualities of the area and the need to manage recreational use of the area in a sustainable manner.

Through this Agreement, the BLM and Grand County seek to improve public service, provide for sanitary conditions, provide for public safety, remove litter, provide, maintain, repair, and replace recreation facilities, conduct environmental education and interpretive programs, prevent environmental degradation, maintain essential transportation routes, and provide parking facilities.

Both the BLM and Grand County aspire to:

1. ensure that the outstanding natural features of the area are protected from the adverse impacts of recreation use,
2. provide sustainable public recreation opportunities consistent with the character and capability of the area,
3. establish an appropriate legal, managerial, and physical framework for the management of recreation use,
4. provide for public safety and reduction of visitor conflicts,
5. maintain essential public access to the area for recreational and other sustainable uses,
6. involve the public and other interested entities in the management of recreational use of the area in compliance with the National Environmental Policy Act of 1969, the Federal Land Policy and Management

Act of 1976, and Utah's Open and Public Meeting Act (Utah Statutes 54-4-1 through 54-4-9).

7. initiate and maintain a partnership for addressing mutual concerns pertaining to public recreation on lands administered by the Bureau of Land Management for the Sand Flats Recreation Area,
8. utilize their combined resources and authorities to cooperatively improve conditions within the area so as to better serve the public and
9. establish a mechanism whereby users of the area fund management, protection, and service expenditures.

This agreement does not alter BLM's responsibilities for management of non-recreational resources on the public lands or alter any existing established rights or agreements with the County, State of Utah, or Public Land users.

I. Purpose

- A. The Purpose of this agreement is to:
 1. establish a cooperative partnership between the BLM and Grand County for the management of public recreation on Public Lands within the Sand Flats Recreation Area administered by the Bureau of Land Management including those roads and parking areas where the County has or may establish a right-of-way (see attached map),
 2. facilitate development and implementation of planning and management decisions involving recreation management for the Sand Flats Recreation Area through a process that best combines the resources and authorities of both partners to improve conditions in the area,
 3. ensure that the outstanding natural features of the area are protected from the adverse impacts of recreation use, provide sustainable public recreation opportunities consistent with the character and capability of the area, provide for public safety and reduction of visitor conflicts, assure the continuation of positive economic benefits to the County associated with public use of the area, and maintain reasonable public access to the area for recreational and other sustainable uses,
 4. involve the public and other interested entities in the management of the area in compliance with the National Environmental Policy Act of 1969, the Federal Land Policy and Management Act of 1976, and Utah's Open and Public Meeting Act.

II. Authorities

A. Bureau of Land Management

Section 307 of the Federal Land Policy and Management Act of 1976 provides the authority to enter into cooperative agreements involving the management, protection, and development of the public lands.

B. Grand County

Interlocal Cooperative Act, Utah Code Annotated Title 11, Chapter 13; Utah Statutes 11-13-1 through 11-33-36

III. Responsibilities and Provisions

A. Grand County agrees to:

1. administer and operate a program to collect a Sand Flats Recreation Area Protection and Maintenance Fee at a location or locations mutually agreed to and deposit such fees into the Sand Flats Recreation Area Maintenance and Protection Fund (the Fund) established by the Grand County Clerk subject to the following provisions:

a. all County costs for initiating and operating the program and related services shall be covered by the fund,

b. the fee program shall be described in detail and managed through an Annual Sand Flats Recreation Area Operations and Maintenance Plan (Annual Operating Plan) which shall establish a budget for the Fund consistent with the County's general budget (see Utah Statutes 11-13-6(4)),

c. initiation and operation of the fee program shall not obligate Grand County to expend any funds beyond those likely to be available from the Fund,

d. Grand County may deduct direct expenses (staff, uniforms, etc.) and reasonable indirect overhead expenses from the Fund prior to disbursement of funds for maintenance and protection as authorized in the Annual Operating Plan,

e. Grand County may make direct expenditures from the fund for maintenance and protection purposes as authorized in the Annual Operating Plan, and

f. funds held by Grand County in the "Grand County Blue Ribbon Committee Account" for the benefit of public lands recreation shall be deposited into the Fund.

2. cooperate with the BLM, subject to all additional County costs being paid by the fund, in the following areas:

a. authorize BLM, subject to the design concurrence of the County Roads Supervisor, to construct the vehicle travel way and parking area improvements needed for the entrance/information station area along the Sand Flats Road and to provide encroachments permits as necessary,

b. extend routine County maintenance of the Sand Flats road to include the additional travel way and parking areas at the entrance station area after BLM completes the initial modifications necessary to implement the program at the mutually agreed upon location for the entrance station,

c. prepare a year-end annual financial report for public review, no later than 60 days from the end of the fiscal year, that describes the total fees collected for the fiscal year, direct and indirect County costs paid by the Fund, interest earned upon deposits, and a record of all disbursements made from the Fund,

d. transfer funds from the Fund to the extent they are available, to the Bureau of Land Management for expenditures as identified in the Annual Operating Plan,

e. provide local, regional, and inter-state public notice of the fee program,

f. fabricate or purchase and install and maintain appropriate roadside signs for the fee program,

g. provide road department assistance, if necessary, with the construction of any physical improvements/alterations needed within the county road right-of-way as may be necessary to implement the fee program, and

h. provide personnel, including law enforcement staff, as required to implement the fee program.

3. The BLM agrees to:

1. provide planning, maintenance, and supervisory expertise for the development and implementation of the Annual Operating Plan, including annual recurring maintenance and long-term restoration and improvement projects,
2. establish a contributed funds account with a project number for deposit of funds contributed by Grand County from the Sand Flats Recreation Area Maintenance and Protection Fund,
3. expend contributed funds, as outlined in the Annual Operating Plan, utilizing County youth programs, community service programs, private contractors, and agency personnel for protection, maintenance, construction and improvement of recreation facilities, visitor service, and visitor education purposes,
4. expend funds contributed by the County only on projects and programs described in the Annual Operating Plan or amendments thereto,
5. provide the County with quarterly and year-end reports describing expenditures from the contributed funds account,
7. construct the initial necessary physical improvements within the county road easement at the entry/information station area as may be necessary to implement the fee program,

C. It is mutually agreed and understood by and between said parties that:

1. a Sand Flats Cooperative Management Team will be formed and will include representatives from Grand County and the Bureau of Land Management who shall develop the Annual Operating Plan and provide guidance to Grand County in the implementation of the fee program, and to the Bureau of Land Management regarding the administration of the area,
2. the Sand Flats Cooperative Management Team shall constitute a joint board for administration of this Agreement and the Annual Operating Plan for purposes at 11-13-7 (1), Utah Statutes,
3. Grand County shall appoint a citizens stewardship committee of not more than five members to advise the Cooperative Management Team on all aspects of the Agreement including expenditure priorities,
4. for 1995, the Annual Operating Plan shall be prepared on a calendar-year basis and be presented to the Grand County Council and the Moab District Office of the Bureau of Land Management no later than March 30; thereafter, the Plan shall be submitted for approval by September 30 for subsequent calendar years.
5. the Annual Operating Plan shall be implemented to the extent fee revenues are available,

5. nothing in this Agreement or in any Annual Operating Plan shall be construed as obligating either party to expend or as involving either party in any contract or other obligation for the future payment of money in excess of appropriations authorized by law and administratively made available for this work,
7. the revenue generated from the fee program and deposited by the County in the Sand Flats Recreation Area Maintenance and Protection Fund shall be expended to pay costs for the following activities:
 - a. entrance station operation and fee collection, including fee permit printing and distribution and public information items as outlined in the Annual Operating Plan,
 - b. annual and recurring maintenance and protection operations as outlined in the Annual Operating Plan,
 - c. recreation site rehabilitation, improvement, replacement, and construction as outlined in the Annual Operating Plan, and
 - d. and any County-incurred administrative, legal or operational costs including, but not limited to, road maintenance, financial reports, signs, notices, judgements, claims, and salaries
8. in addition to the items listed above, administrative support costs attributable to this cooperative agreement including purchasing, document processing, personnel actions, data processing, fund deposits, liability insurance, etc. shall be paid for from the Protection and Maintenance Fund,
9. the following shall be exempt from the Protection and Maintenance fee:
 - a. land owners with property "on the mountain" and publics routinely accessing the mountain via the Sand Flats Road,
 - b. Federal, State, or local government officers, employees, and volunteers on official business,
 - c. all permittees of the BLM, Forest Service, Utah Division of State Lands and Forestry and their employees conducting business or operations under such permits,
 - d. any individual involved with search and rescue, fire suppression, of other emergency actions, and
 - e. paying guests of commercial recreation permittees authorized to use the area,
10. it may be necessary from time to time to cooperatively develop special rules or ordinances needed to provide for public safety or for the maintenance and protection of the Sand Flat Recreation Management Area, and that development of such rules or ordinances will be conducted through appropriate public processes,
11. no member of, or Delegate to, Congress shall be admitted to any share or part of this agreement, or any benefits that may arise therefrom,
12. no contribution provided herein of donation or gift of any kind shall entitle the contributors or donors to any share or interest in the said land, its resources, or improvements other than the right to use and enjoy the same under the existing regulations of the Bureau of Land Management,

13. no part of this agreement shall entitle the County to any share or interest in the results of this program other than the right to use and enjoy the same under the existing regulations of the Bureau of Land Management, including its right to improve and maintain the Sand Flats road under its existing right-of-way, except that the County is entitled to the reimbursable payments from the Fund as outlined in the Agreement,
14. even though the County will contribute funds to the Bureau of Land Management, the Bureau shall have the complete responsibility and liability for the operation and maintenance of Federal recreation facilities and the management and protection of all Bureau-administered Public Lands within the Sand Flats Recreation Management Area,
15. all improvements constructed in whole or in part from contributed funds shall be and will remain the property of the Federal Government, excluding transportation related improvements constructed within the County right-of-way along the Sand Flats Road,
16. this Agreement shall be reviewed and approved by the Grand County Attorney for Grand County and the Salt Lake City Regional Solicitor's Office for BLM prior to being submitted for the approval of the Grand County Council and the Moab District Manager,
17. this Agreement shall be effective upon execution by both parties and subsequent filing with the customary Custodian of public records in accordance with 11-13-9, Utah Statutes, and shall continue with the mutual consent of both parties, in accordance with the terms and conditions herein provided, but shall in any event terminate 50 years from its effective date (see 11-13-17, Utah Statutes).
18. this Agreement may be revised as necessary by mutual consent of both parties, by the approval of a written amendment, signed and dated by both parties,
19. either party may terminate this Agreement without cause by providing thirty (30) days written notice to the other party,
20. if this agreement is terminated as herein provided, or otherwise by operation of law, unexpended fees shall be utilized to satisfy outstanding obligations of the program,
21. upon termination of the Agreement and satisfaction of outstanding obligations, any remaining funds shall be retained by the County to be used for County purposes within the Sand Flats Recreation Management Area; any other property, exclusive of personal property, shall be disposed of in accordance with section III. C. 15 (see 11-13-6, Utah Statutes).
22. Due to the ownership pattern of lands within the area of this agreement, which includes lands owned and managed by the State of Utah, it is mutually agreed by both the BLM and Grand County that the provisions of this Agreement should be extended to the State of Utah at such time as all parties deem appropriate. In the interim, no monies will be collected for camping on, or expended for the development of State lands beyond the current level of management as prescribed in Division of State Lands and Forestry PREDESIGNATION NO. 25, dated October 26, 1993.

IN WITNESS WHEREOF, this agreement shall be effective as of the date herein and upon execution by both parties hereto:

GRAND COUNTY



PAUL MENARD
Chairperson,
Grand County Council

Date: 6/28/94

UNITED STATES DEPARTMENT OF INTERIOR



BILL STRINGER
Bureau of Land Management
Acting Moab District Manager

Date: 6/23/94

ATTEST:



FRAN TOWNSEND
County Clerk

Date: 6-28-94

