

# Updated Draft Business Plan for Sand Flats Recreation Area



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Moab Field Office  
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**Draft Business Plan for  
Sand Flats Recreation Area**

**RECOMMENDATIONS, REVIEWS and APPROVALS**

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This business plan was prepared pursuant to the “Federal Lands Recreation Enhancement Act, 2004” (P.L. 108-447) and Bureau of Land Management recreation fee program policy. It establishes future management goals and priorities for the Sand Flats Recreation Area within the Moab Field Office.

## Executive Summary, Sand Flats Business Plan Update 2023

Since 1994, The Sand Flats Recreation Area (SFRA) has operated as a financially self-sustaining program under a Cooperative Management Agreement between Grand County and the Bureau of Land Management. Under Amendment 3 of this agreement, SFRA must gain recommendation from the Utah Recreation Resource Advisory Council to amend the SFRA fee schedule. All fees collected are utilized by Grand County to provide visitor services at SFRA; the fees are collected and deposited in a Grand County account.

SFRA proposes a change in fees to be charged for developed recreation facilities and services to be implemented over the next 3 years. The cost of providing services has increased steadily since the current rates were established in 2016. From 2017 through 2021, employee wages have increased by 53% and benefits by 51%. Staff are employees of Grand County and are paid and benefitted on the Grand County payroll schedule. Grand County’s minimum wage was raised to \$17.29/hour for all employees, including interns, in 2021, thus increasing employee costs. Toilet cleaning, pumping and waste disposal costs have increased by 63% and trash collection service costs have increased by 73% since 2016.

The SFRA fee schedule was last amended in 2016. At that time a change was made to the camping, annual pass and utility trailer fees. SFRA is proposing a range of fee changes implemented over the next 3 years as needed to meet operational costs. Recommendations include that the expanded amenity camping fee be changed from \$15 to \$30 per vehicle per night. The utility trailer fee would be removed. The annual pass fee would change from \$25 to \$50 within 3 years. The group campsite rates would also be increased from \$60 to \$100. The one-day fee would be eliminated and the standard amenity fee would be good for 7 days. Changing the one day fee to a weekly pass will streamline operations and reduce waiting times at the entrance.

The changes are summarized in the table below. The Sand Flats Stewardship Committee and Grand County Commission voted to approve these proposed fee changes in 2022.

### SFRA Proposed Rate Changes Summary

Site Type or Service	Description	Current Rate	Proposed Rates-Fully Implemented by 2025
<b>Camp Site</b>	Fee for camping in developed campsites	\$15.00 per vehicle	<b>\$30.00 per vehicle</b>
<b>Day Use Per Towed Vehicle</b>	Fee for day use	\$5.00	<b>No longer applicable. Fee to be eliminated to encourage people to trailer to trailheads.</b>
<b>Annual Pass</b>	Fee for an annual pass for day use	\$25.00	<b>\$50.00</b>
<b>Group Site</b>	Fee for camping in group campsite	\$60.00	<b>\$100.00</b>

<b>Day Use Per Vehicle</b>	Fee for day use	\$5.00 for 1 day or \$10.00 for 7 days	<b>\$10.00 for 7 days. Day pass to be eliminated.</b>
<b>Day Use Per Person by Bicycle or Motorcycle</b>	Fee for day use	<b>\$2.00 for 1 day or \$5.00 for 7 days</b>	<b>\$5.00 for 7 days. Day pass to be eliminated.</b>

**Updated Business Plan for Sand Flats Recreation Area  
2023**

**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 SFRA rises in the east to meet the colorful mesas below the nearly 13,000-foot peaks of the Manti La Sal National Forest. Bordering SFRA on the north and south are the canyons of the Grandstaff and Mill Creek Canyon Wilderness Study Areas. Further north lies the deep gorge of the Colorado River and Arches National Park.



The SFRA is home to the Slickrock, Falcon Flow and Porcupine Rim Mountain bike trails as well as 25 miles of jeep trails (including Hell’s Revenge and Fins and Things) which are world-renowned for their combination of challenge and iconic scenery. These trails constitute “bucket list” items for many visitors. Along with easy access to biking and 4x4 trails, the SFRA manages nine campgrounds with a total of 140 individual campsites, and six group sites. Approximately a quarter million visitors enjoy this 9,000-acre recreation area annually.

The partnership between Grand County and the Bureau of Land Management (BLM) to effectively manage SFRA is unique. In 1994, 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. Fees were charged by the County at the location commencing in 1995. (This collaboration was established prior to Fee Demo which was established in 1996 and the Federal Lands Recreation and Enhancement Act of 2004). In 2010, the Sand Flats Business Plan was recommended for approval by the BLM's Resource Advisory Committee (RAC) for the user fees that are collected by Grand County. In 2015, Sand Flats presented an updated Business Plan to the RAC in order to affect a fee increase. The RAC recommended BLM approve those fees and they were implemented in 2016. This current effort updates the 2016 Business Plan.

The SFRA has a contact station where day use and camping fees are collected and visitors can ask questions. The contact station is staffed daily from mid-February through November. A self-service pay station is located at the contact station for payment when the contact station is closed. All funds collected are held by Grand County as part of the Cooperative Management Agreement 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 the contact station.

Management of the SFRA is addressed in the Moab Field Office Resource Management Plan (RMP) (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, 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.

#### Financial self-sustainability

The SFRA is managed as a financially self-sustaining entity in partnership with Grand County and the BLM-Moab Field Office. All fees are collected by Grand County and are allocated to operations of the SFRA. 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:

- contact 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, one of the centerpieces of the SFRA, was designated as a National Recreation Trail in 1992. The SFRA is managed as a destination Special Recreation Management Area (SRMA) in the Moab RMP. Beneficial outcomes 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. This proposed fee change, if approved, would go into effect on June 1<sup>st</sup>, 2023.

### **Visitor Profile**

In 2021, an estimated 250,000 people visited SFRA. About 214,000 paid via fee collection on-site and another estimated 40,000 participated as part of a permitted activity.

In 2021, the estimated number of visitors to the SFRA (generated from fee collection data) was 213,953 visitors. Of these visitors, over 145,998 entered for day use by personal vehicle; 6,847 entered by bicycle, motorcycle or shuttle; and 61,108 camped.

The above statistics are generated from fee revenues and do not include visitors under a Special Recreation Permit (SRP) from the BLM (SRP clients do not pay the Sand Flats Day use fee, as outlined in the Agreement). SRPs include commercial use and organized group/events. Statistics generated from these additional BLM permitted users places SRP related visitation numbers at approximately 250,000 visitors annually.

Based on past informal surveys, a third of visitors are from northern Utah; a third are from Colorado; and of the last third, half of those live west of the Rocky Mountains (apart from Utah and Colorado), and half live east of the Rocky Mountains. SFRA visitors also visit additional locations that surround Moab including other BLM lands and National and State Parks.

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

Motorized recreation has increased dramatically in the last ten years. Based on data collected at the contact station in 2021, more than half of the visitors come to SFRA to engage in motorized activities, including 4x4 driving or utility terrain vehicle (UTV) driving on Hell’s Revenge and Fins and Things designated motorized routes and riding motorcycles on the Slickrock Trail. Other visitors come to mountain bike the Slickrock, Porcupine Rim and new Falcon Flow bike trails. A growing number come to explore Sand Flats hiking trails including the newer Pinion and Juniper hiking trails



Visitors to SFRA vary in age 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 at SFRA are non-local. They base themselves out of the SFRA, use SFRA facilities and trails while also visiting other locations in the Moab area.

Spring is the busiest season at SFRA, followed by fall, summer and winter. Peak use occurs in April and May, with March and October visitation numbers close behind. SFRA is popular for both college students and families on spring break seeking sunlight and warm weather.

SFRA visitation increased 11% from 2017 to 2019. In 2020, Sand Flats revenue dropped 21% compared to 2019. Grand County was closed to all over-night use (including hotels and camping) due to pandemic precautions enacted by the County. That is, no visitors were allowed to stay overnight in Grand County for the entire spring 2020 season. Sand Flats thus lost all revenue from spring of 2020, its most lucrative season. However, visitation rebounded in 2021, rising 24% over 2019. This visitation is shown in Table 1: *Sand Flats Recreation Area Estimated 4-Year Average Visitation*.

**Table 1. Sand Flats Recreation Area Estimated 4 Year Average Visitation.** (Due to Covid19, visitation statistics in 2020 are inaccurate and not included. Visitation is calculated based on fee revenue categories and does not include Special Recreation Permits which do not pay fees to SFRA but to BLM directly; actual visitation is thus higher.)



2017	2018	2019	2021	2022	Average 5 year
146,374	152,570	162,086	213,953	184,115	171,820

**Federal Lands Recreation Enhancement Act Analysis**

Section 3(a) of the Federal Lands Recreation Enhancement Act of 2004 (FLREA) provides the authority for establishing, modifying, charging and collecting recreation fees on Federal recreational lands and related waters. Section 3(b) provides that recreation fees shall be established consistent with the six criteria discussed below which form 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 destination for recreation. Public lands, because of the extensive 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 2017 through 2022, despite the pandemic, has grown by 26%.

It is anticipated that the perception of relative value will generally continue if the fees increase as SFRA is comparable to fees for nearby public lands (see Table 2. *Consideration of Comparable Fees Charged by Nearby Public Land Agencies and Private Sector Operators*).

The fees collected at SFRA cover all staffing, services and maintenance for the operational management of SFRA. Capital improvements are partially funded using other federal and state sources; BLM provides engineering and heavy equipment assistance, law enforcement assistance, and undertakes any required NEPA work, SFRA is self-sustaining and operates as an enterprise fund and receives no funding from Grand County.

Services provided by fee revenue include staffing the contact station daily from mid-February to November; daily patrols of the front country areas including checking for fee compliance at the 140 individual campsites, six group sites, and an overflow camping area. The facilities are regularly maintained including fire rings and picnic tables at these campsites. Daily patrols also entail checking and maintaining facilities at nine trailheads, as well as interacting with the public at these locations. Services also include backcountry trail patrols and the maintenance of some 45 miles of trails, 35 information boards and kiosk displays. These developed recreation facilities are maintained, and damaged facilities are repaired and improved. Collected fees pay for toilet cleaning and pumping services for 28 vault toilets as well as removal of trash. Routine cleaning includes campground maintenance and picking up loose trash. Staff members also regularly maintain fences as well as barriers and signs to assist in travel management.

Major service costs funded out of collected fees include labor and benefits for Grand County staff (four to ten staffers depending on season); routine contract cleaning, pumping and disposal of toilet vault septage, contract trash dumpster service, lease and maintenance of vehicles, maintenance

equipment and materials, fuel costs, signs and printing of brochures, maps and fee collection materials.

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

Fee increases will be phased in from fall 2023 to spring 2025. Because the camping fees and annual passes would not be subject to an increase in 2023, approximately 39% of SFRA visitors would not see an immediate increase in fees in 2023. Approximately 53%, primarily day users would see an increase in fees and 8% would see a reduction in fees in 2023 with the elimination of the trailer fee.

Under this proposal, the single day pass would be eliminated and the weekly pass would be the only option for entry. A vehicle fee would go from \$5 per vehicle to \$10; however, the pass would be good for one week instead of only one day. The bicycle and motorcycle single day pass would be eliminated and replaced with a one-week pass. The bicycle and motorcycle fee would increase from \$2 to \$5, but the pass would be good for one week. Weekly passes would have the added benefit of decreasing time people spend at the contact station, thus decreasing the time other visitors spend waiting to access SFRA. The annual pass fee would remain unchanged in 2023; however, the proposal includes an option for increase from \$25.00 to \$50.00 by 2025.

Under this proposal, the trailer fee would be eliminated. Grand County wants to encourage trailering UTVs through town due to noise disturbance in neighborhoods, and the county has already approved this change. The current fee schedule discourages trailering by charging an SFRA day use fee for trailers. Since Sand Flats fees are currently low compared to surrounding parks, the fees proposed are still minimal per visitor. The increase in fees would enable SFRA to fund its operations and maintain the high standard of services provided to the visitor, from sparkling clean toilets to interaction with a Sand Flats staff member. The fee increase would facilitate the continuity of operations and ensure the health and safety of visitors.

Day use costs have not changed since 2009. The proposed fee increase would be low compared to those charged by other public land agencies in the Moab area. Surrounding National Parks charge \$30 for a 7-day pass; the SFRA proposed day use rate would be a third of National Park day use rates. The day use fee or entrance for nearby Dead Horse Point State Park is \$20 for a one-day pass; again, the SFRA proposed day use rate is one-half of that and allows access for an entire week.



Under the proposed plan, the individual campsite fee, expanded amenity fee, would increase from the current \$15 to \$30 and the current \$60 to \$100 for reservable group campsites. There has been no change in camping fees since 2015. The proposed fee increase is necessary to cover the increased cost of materials, goods and services. In addition, Grand County has raised its minimum wage and the salaries of all seasonal employees have almost doubled. Costs of services such as trash disposal and toilet pumping have also increased. Additional revenue will also allow employees to address resource damage that has resulted from the increased visitation to the area. The SFRA does not charge a day use fee for any vehicle merely utilizing the road to drive through the recreation area to the U.S. Forest Service land that makes up its eastern boundary. The SFRA also holds volunteer days in the spring and fall and anyone willing to volunteer to work for four hours is awarded an annual pass. This makes it easy for residents of Grand County (as well as visitors) to earn their annual pass-through volunteer labor. Over the past five years, there were 1,301 volunteer hours donated to the SFRA in exchange for an annual pass.

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

Table 2 compares current the Sand Flats day use and camping fees with those charged by other nearby public agencies and the private sector. The chart shows that SFRA fees are much lower than those charged by other public agencies and nearby private sector operators. The SFRA proposed rate change for day use would bring the fees in line with surrounding state and national parks that sell only a weekly pass for day use.

#### **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), staff needed to maintain and patrol trails and work in the contact station increase proportionally. Additionally, more use results in accelerated deterioration of parking areas and facilities so that they require more frequent corrective maintenance or replacement. Increased visitation has also increased demand for additional and improved facilities such as trails, roads, parking lots and campgrounds. The Federal Land Recreation Enhancement Act (FLREA) 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 provide for public health and safety, enhance public enjoyment and to provide services at a fair market value.

The BLM recreation program policy and management objectives for the recreation program are described in BLM's "Connecting with Communities" strategy. This strategy emphasizes engaging with communities, creating collaborative recreation management partnerships and providing quality recreation experiences. Particularly germane to this Business Plan effort is Strategic Focus 2:

*Strategic Focus 2: Use Collected Fees to Their Maximum Potential To Develop Recreation Benefits. Fee revenues will continue to support sites where the fees are collected, improving recreation opportunities in and near the communities where they are located. Field managers can also use fee dollars as an investment that supports the overall recreation and tourism goals of the community. The BLM will improve external communications about fee revenue expenditures by highlighting the fee program's value.*

In accordance with the Cooperative Management Agreement between the BLM and Grand County, all of the funds collected are held by Grand County to be used for recreation management in the area. Under FLREA, 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 totally self-sustaining and recreation fees pay all operating costs. This proposed fee increase is necessary due to the increase in visitation and in the costs of materials, goods and services; the fee increase will allow SFRA to continue to be self-sustaining. Only by enacting a proposed fee change can these operations continue at the present level of service. Without the proposed fee change it will not be possible to provide high quality services to the visitor.

#### **5) Consideration of input from a recreation resource advisory council**

Under FLREA, the BLM must consult with the Utah Recreation Resource Advisory Council (RAC) when implementing an expanded or standard 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 – to the Cooperative Management Agreement.

At the June 9, 2006 Utah RAC meeting, it was decided that it would function as the Recreation RAC for both BLM-Utah and national forest offices in Utah. SFRA will present its proposal for fee increases to the Utah Recreation RAC in May of 2023. The Sand Flats Stewardship Committee and Grand County Commission voted to approve the proposed fee change in 2022.

**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 Commission through a public process which includes public meetings and public hearings. The SFRA Director and the Grand County Clerk ensure that the fund expenditures in the SFRA budget are in accordance with the adopted budget.

In accordance with FLREA, fees collected and expended are 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 are also displayed on site.

Table 2 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.

**Table 2. Consideration of Comparable Fees Charged by Nearby Public Land Agencies and Private Sector Operators**

Name	Day Use Rates	Camping Rates	Amenities
Arches National Park	\$30/ vehicle entry fee for 7 days; \$15/ pedestrian or bicycle for 7 days; \$25/ motorcycle fee for 7 days; \$55/ 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. Requires entry fee in addition to camping fee.	Picnic tables, drinking water, access road, fee collection, Law Enforcement, trash container, toilets, fire rings
Canyonlands National Park	\$30/ vehicle entry fee for 7 days; \$15/ pedestrian or bicycle for 7 days; \$25/ motorcycle fee for 7 days; \$55/ local annual pass for	\$15 to \$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. Requires entry fee in addition to camping fee.	Picnic tables, drinking water, access road, fee collection, Law Enforcement, trash container, toilets, fire rings

	parks in Southeast Utah Group		
Dead Horse Point State Park	\$20/ vehicle entry fee for 2 days; \$10/ motorcycle for 2 days; \$4/ bicycle or pedestrian for 2 days; annual pass to all Utah State Parks \$100	\$40 to \$50/ vehicle per night (includes entrance fee); second vehicle is \$20.	Shade shelter, picnic table, tent pad, access road, fee collection, Law Enforcement, trash container, toilets, fire rings, power in RV sites, dump station
BLM-Moab Field Office	None	\$20/ site per night	Picnic tables, access road, fee collection, Law Enforcement, trash container, toilets, fire rings
Sand Flats Recreation Area (Current Fees)	\$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 \$25, utility trailer fee \$5	\$15/ vehicle per night (includes entrance fee); Group campsite, \$60 for 11-16 persons, \$8 reservation fee	Picnic tables, access road, fee collection, Law Enforcement, trash container, toilets, fire rings, interpretive signs/kiosks.
Sand Flats Recreation Area (Proposed Fees)	\$10/vehicle for seven days \$5/bicycle and motorcycle for seven days \$50 Annual Pass	\$30/vehicle per night; Group campsite \$100 for 11 – 16 persons.	Picnic tables, access road, fee collection, Law Enforcement, trash container, toilets, fire rings, interpretive signs/kiosks.
Nearby Private Sector Operators		\$40 plus / site per night	Picnic tables, drinking water, shower, dump station, access road, fee collection, trash container, toilets, fire rings

### **Modifications to Recreation Fee Rates**

The cost of providing services at the SFRA has increased steadily over the years while the fees have not increased since 2015; the day use rate has remained constant since 2009. From 2017 to 2022 visitation has increased 26%. More visitation causes accelerated deterioration of roads, trails and facilities and increased costs for toilet cleaning, pumping and trash service.

Comparing SFRA fees and amenities with fees charged for similar nearby public land agencies and nearby private sector operators, SFRA fees are shown to be lower for similar amenities (see Table 2 above).

This proposal would 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 FLREA and the implementing regulations in 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 (day-use fee) and an expanded amenity recreation fee (campsite fee).

The current day use fee is \$5.00 per vehicle for one day; \$10.00 per vehicle for seven days; \$2.00 per bicycle, shuttle or motorcycle for one day; \$5.00 per bicycle, shuttle or motorcycle for seven days. The fee for a utility trailer is \$5.00. The annual pass rate is \$25.00. Camping is \$15.00 per vehicle per night for up to 5 people and \$2.00 for each additional person. Reservable group campsites are \$60.00 per night for 11-16 people. Campers currently do not pay the day use fee.

On January 1<sup>st</sup> 2016, SFRA camping fees were amended. The camping fee changed from \$10.00 per vehicle to \$15.00 per vehicle per night. The utility trailer fee changed from \$2.00, to \$5.00 per trailer. The annual pass fee of \$20.00 changed to \$25.00. The group campsite rate increased from \$50.00 to \$60.00 to correspond to individual camping fee changes and increased costs in administering the reservation system. See Table 3. *SFRA Proposed Rate Changes*.

Prior to this, 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 remained the same from 2006 through 2015. The annual pass fee remained the same from 1998 through 2015.

The proposed fee change is to drop single day, day use fees, so that all day use fees are valid for seven days. The proposal also seeks to increase fees for the individual campsites from \$15 to \$30, group campsite fee from \$60 to \$100 and annual pass fee from \$25 to \$50. See Table 3. *SFRA Proposed Rate Changes*.

The proposed fees were considered and approved by the SFRA Stewardship Committee in July 2022. This citizens' board governs the day-to-day operations of the SFRA; it is a public process and open to all. The Grand County Commission approved the day use fee increase at its December 2022 meeting. The County fee schedule is revisited annually, and as other fees are changed, they will be reviewed by the Grand County Commission.

Assuming stable use by campers and day use visitors, these rate changes will produce approximately \$175,000 per year in additional annual revenue for the SFRA program in 2023 and \$291,146 annually by 2025, as other fee increases are phased in. These fees will be used to meet increased costs for staffing, to help meet the demand for new facility development and for the increased maintenance costs of existing facilities.

The BLM Moab Field Office and SFRA will continue to explore electronic payment and e-commerce solutions in accordance with BLM Instruction Memorandum No. 2022-019, to provide recreation visitors opportunities to find, reserve, and pay for campsites. Most of these options are provided through the interagency reservation service Recreation.gov. E-commerce solutions, including the scan and pay option, will incur an expanded amenity fee for reservation services in addition to any other standard or expanded amenity fees in accordance with 16 U.S.C. 6802(g)(2)(G). The amount of the fee is determined and charged by the contractor. Current reservation fees can range from \$0.50 to \$10.00. A reservation fee is subject to contracting requirements on Recreation.gov and will be adjusted as that contract changes or with future updates to the Business Plan. For visitors who wish not to pay the expanded amenity fee of

reservation services, payment with a Recreation Use Permit (RUP) envelope will exist until the field office moves the fee area entirely to e-commerce and/or the RUP envelope, Form 1370-036, is no longer available for payment.

**Table 3. SFRA Proposed Rate Changes**

Site Type or Service	Description	Current Rate	Proposed Rates
Campground	Fee for camping in developed campsites, includes day use	\$15.00 per vehicle	\$30 per vehicle
Day Use per Towed Vehicle	Fee for day use	\$5.00	No longer applicable
Annual Pass	Fee for an annual pass for day use	\$25.00	\$50
Group Site	Fee for camping in group campsite; includes day use	\$60.00	\$100
Day Use per Vehicle	Fee for day use	\$5.00 for 1 day; \$10.00 for 7 days	\$10.00 for 7 days
Day Use Per Person by Bicycle or Motorcycle	Fee for day use	\$2.00 for 1 day; \$5.00 for 7 days	\$5.00 for 7 days

It should be noted that there are benefits to the users from eliminating the day use fee and instituting week-long only fees. Most visitors end up staying more than one day. In addition, instituting a week-long fee only will mean that less time is expended at the contact station, where lines can often be long. All users will benefit from a more efficient entry point and access to SFRA.

**Operating Costs**

The cost of providing services and maintaining facilities has increased steadily since the current rates were established. From 2017 to 2022, wages have increased by 53% and benefits by 51%. Staff are employees of Grand County and are paid and benefitted on the Grand County payroll schedule. Grand County’s minimum wage was raised to \$17.29/hour for all employees, including interns, in 2021, thus increasing employee costs. Toilet cleaning, pumping and waste disposal costs have increased by 63%. Trash collection service costs have increased by 73%. Substantial trailhead improvements have been made to compensate for increased use. See Table 4. *Total Expenditures and Revenue 2017-2021*.

**Examples of new construction projects in addition to annual operating budget paid partially or fully with collected fee revenues**



During 2009, the SFRA constructed a 20,000 square foot paved trailer parking area at the Hell's Revenge Trailhead, installed two new vault toilets, and an educational kiosk display and signs. The total project cost was \$127,000 which 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 contact station with collected fees. Total project costs were \$51,000.

In 2011, the Slickrock Bike Trail Trailhead Improvement project was completed; four toilet buildings were repaired and painted, an interpretive shade 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, SFRA obtained 500 large sandstone boulders valued at approximately \$60,000 for under \$10,000 in hauling fees. The 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 signs were added. SFRA also constructed a 36,000 square foot graveled parking area for the Fins and Things 4x4 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, SFRA also seal-coated and striped the Hell's Revenge 20,000 square foot parking lot.

In 2015, improvements were made in the Bobcat Campground; interpretive signs were added to the improvements made to protect the Dinosaur Track site on Hell's Revenge trail the previous year; new regulatory and directional signs were added to the Hell's Revenge trail.

In 2016, repair of the Slickrock and Hell's Revenge trail parking lots; Improvements completed in 5 campsites and campground roadways were graded; installed new signs with maps on Hell's Revenge, Fins and Things and Porcupine 4x4 trails.

In 2017, the Juniper hiking trail constructed along with parking area; two shade structures built in group campsites; concrete ramp constructed at Hell's Revenge trailhead; updated kiosk displays were completed at the entrance to the Recreation Area.



In 2018, a new exit route was created for the Hell’s Revenge trail. It was built along with a second concrete ramp; additionally, a three mile “dot” route, single-track motorized, was approved and built as an addition to the Slickrock Bike trail; updated trailhead kiosk displays were designed and installed at Fins and Things and Hell’s Revenge parking areas; improvements were made to the Fins and Things 4x4 trailhead by creating a new entrance (which avoided Campground E) and adding one-half mile to the trail.



In 2019, a campground improvement and expansion project was completed in campgrounds C and D in partnership with the BLM, Sand Flats and Grand County Road Department. Work included constructing new campground loops, upgrading and expanding existing campsites and adding reservable group sites. SFRA staff fenced sections of Fins and Things and Hell’s Revenge 4x4 trails to reduce trail widening.

In 2020, a contractor repaired a section of Hell's Revenge 4x4 trail that had become unsafe for UTVs and was impeding traffic flow. Grand County moved the Sand Flats office operation to a new location, so a new custom office modular building and grounds project was completed. Grounds included the construction of two concrete driveways, accessible parking and metal stairs and accessible ramp. In addition, the new Falcon Flow Mountain bike trail and parking lot was built.

In 2021, four group campsites with metal shade structures were completed. Crack sealed, and seal coated Slickrock and Hell's Revenge parking lots. Repaired and painted Fins and Things 4x4 trail parking area concrete toilet building.

In 2022, improvements include construction of a 36,000 square foot gravel parking lot for trailers. Repaired and painted concrete toilet buildings at Slickrock, Hell's Revenge and Bobcat Campground.

**Table 4. Total Expenditures and Revenues 2017-2021 in Dollars**

<b>Budget Items</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Salaries	184,281	201,692	256,545	213,429	281,284
Overtime	363	1,157	2,426	1,693	654
Benefits/Health insurance	91,987	104,283	121,054	125,591	138,403
Public notices	0	0	504	557	85
Office supplies & equipment	1,451	1,307	1,044	1,138	547
Vehicle maintenance	2,661	2,878	3,127	1,492	3,035
Building & Grounds maintenance	79	1,899	380	1303	2,413
Utilities	2,743	2,703	2,924	3,362	4,218
Contract professional services	454	421	12,017	0	5,060
Lease payment vehicles	0	0	0	0	5,554
Contract services – toilets	38,986	40,141	41,025	34,027	63,621
Accounting fees	5,000	5,000	10,000	40,920	40,920
Search and Rescue fund	10,000	10,000	10,000	10,000	10,000
Scholarship fund	0	0	1,000	0	0
Discretionary fund	497	224	5,092	311	640
Slickrock Trail dumping fees	10,805	12,901	14,378	12,838	18,675
Fuel	2,676	3, 513	4,163	2,848	6,500
Uniforms	1,812	1,549	2,838	925	1,522
Printing and publishing	11,573	16,597	15,789	20,120	15,409
Insurance	352	365	443	616	735
Supplies & equipment	8,744	9,418	6,194	8,140	11,360
Capital improvements	6,742	26,359	100,795	196,932	54,645
Capital Equipment	0	9,193	18,559	0	21,366
Inventory	0	2,050	1,145	1,700	317
Inventory office	1,164	1,311	382	110	2,665
Inventory tools	6,025	919	1,666	189	3,536
Campground host	0	0	400	500	3,000
Staff training	165	184	207	109	107
<b>Total Expenses</b>	<b>388,368</b>	<b>456,287</b>	<b>634,097</b>	<b>678,850</b>	<b>696,272</b>
<b>Fee Revenue</b>	<b>613,921</b>	<b>594,065</b>	<b>633,460</b>	<b>489,103</b>	<b>734,971</b>
Youth Initiative Grant	8,000	8,000	0	0	19,499
Online Group Campsite Sales	0	31,321	26,162	32,238	91,972
Interest and Expense Reimbursement	3,013	6,280	5,531	6,002	908
Sale of Fixed assets	1,900	0	0	0	0
<b>Total Revenue</b>	<b>626,833</b>	<b>639,666</b>	<b>665,153</b>	<b>527,342</b>	<b>847,350</b>

Table 5 and Figure 1 below show SFRA percentage of change in revenue 2017-2021.

**Table 5. Sand Flats Recreation Area % of Change in Revenue Each Year Over Previous Year 2017-2021**

Year	% of Change				
	2017	2018	2019	2020	2021
TOTAL		2%	5%	-21%	59%

**Figure 1. Sand Flats Recreation Area Revenue Graph 2017-2021**

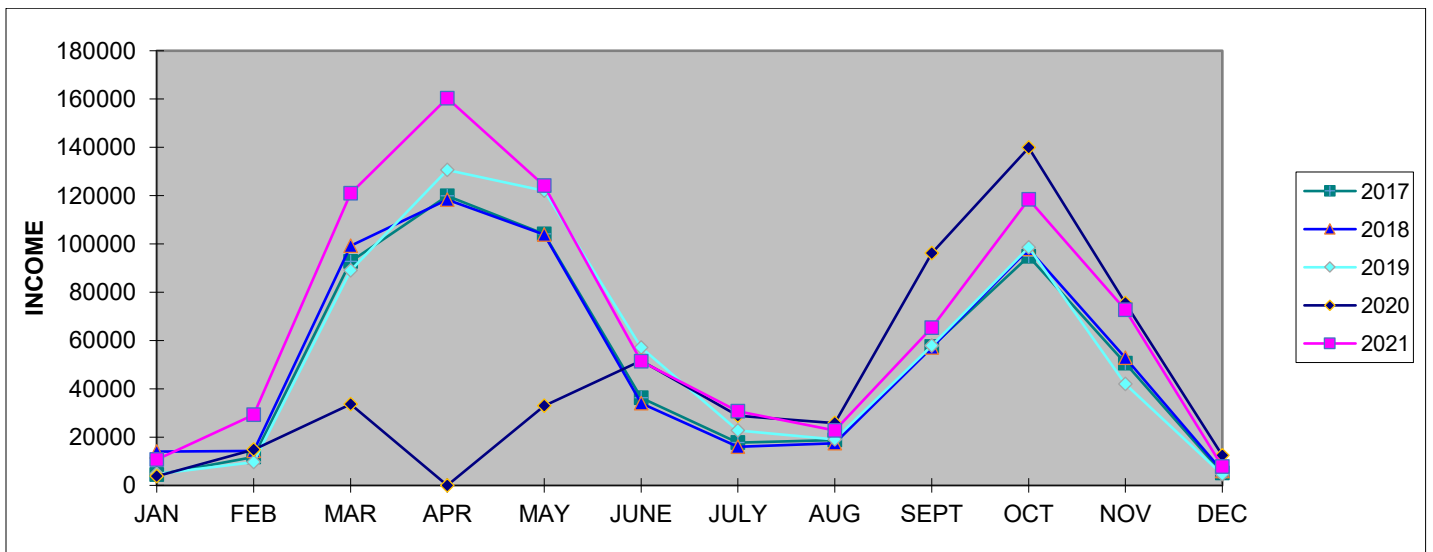


Table 6 shows the projected revenues for 2023 if the fee change were to be implemented. See Table 8 for projected revenues for 2022 – 2027. Full implementation of the proposal starts in 2025.

**Priorities of Future Expenditures**

<b>Table 6: Project Annual Revenues in 2023 If Fee Change Were Implemented</b>				
<b>Remit Totals</b>	<b>2019</b>	<b>Rate Change</b>	<b>Estimated Additional Fees</b>	<b>2023</b>
Camping	\$321,738	From \$15 to \$30 per vehicle per night with up to 5 people, additional persons \$2 each <b>(implement 2025)</b> . Drop fee for utility trailer (implement 2023), resulting in lower camping fee for 2023	(\$13,464)	<b>\$308,274</b>
Trailer	\$28,997	Drop fee for utility trailer (Implement 2023)	(\$28,997)	<b>\$0</b>
Annual pass	\$25,915	From \$25 to \$30 each <b>(Implement by 2025)</b>	\$0	<b>\$25,915</b>
Group sites	\$32,325	From \$60 night to \$100 night (Implement to \$80 by 2025)	\$0	<b>\$32,325</b>
Day Use Per Vehicle	\$238,453	From \$5 to \$10 per week only (Implement 2023)	\$200,708	<b>\$439,161</b>
Day Use Per Person by Bicycle or Motorcycle (Shuttle fee no change)	\$14,334	From \$2 to \$5 per week only (Implement 2023)	\$16,689	<b>\$31,023</b>
Other	\$3,638			\$3,638
<b>Total Revenue from Proposed Fees</b>	<b>\$665,400</b>		<b>\$174,936</b>	<b>\$840,336</b>

<sup>1</sup> Fees are to be phased in from 2023 to 2025. This table represents projected increased revenues for the entire 2023 year; actual 2023 revenues are projected to be less because fee increase would only be for a partial year.

## **Expenditures critical to operation**

SFRA fees fund all staffing, facility services and maintenance at the SFRA. Services include staffing the contact station daily from mid-February through November; daily patrols of front country areas, including checking for fee compliance in 140 individual campsites, six group sites, 9 trailheads and one overflow camping area and maintaining facilities including fire rings and picnic tables at these campsites. Daily patrols also include checking and maintaining facilities at 9 trailheads, 35 information boards and kiosk displays, as well as talking to visitors at those locations. Services also include a minimum of bi-weekly backcountry trail patrols and the maintenance of approximately 45 miles of trails. SFRA collected fees pay for toilet cleaning and pumping services for 28 toilets as well as for trash removal. 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 four to ten person staff; routine contract cleaning, pumping and disposal of toilet vault waste; maintenance equipment and materials; contract trash dumpster service; maintenance of 4 trucks and 3 UTVs and fuel costs; signs 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 will make funds more readily available to address some short and long term maintenance and improvement needs. These include but are not limited to:

- Improve traffic flow at SFRA contact station to make passage more efficient, \$150,000
- Crack seal and sealcoat the 200 space parking lot at the Slickrock Bike Trail and the Hell's Revenge parking area in 2025 at an estimated cost of \$70,000.

- Purchase of three trucks leased to own in 2021, 2022 and 2023 and upkeep or purchase of three patrol UTVs at approximately \$176,000.
- Build carport for Sand Flats office yard to protect equipment, \$50,000.
- Matching funds for construction of new two-mile non-motorized trail to parallel the Sand Flats Road and improve visitor safety, approximately \$100,000.
- Building up a matching fund balance to pave four miles of the Sand Flats road, including bike lanes; this project is estimated to cost \$1 million per mile. SFRA would be required to provide some of the matching funding for the federal grants if awarded.
- On-going trailside restoration work and trail improvements along some 25 miles of 4x4 trails.



## **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. The 2020 pandemic year showed the importance of a positive fund balance; as revenues plummeted, staff could be retained due to the positive fund balance. Staff time was spent on maintenance actions and adapting to new ways of conducting business while maintaining the health and safety of employees. At current expenditures, the SFRA has determined that a minimum annual balance of approximately \$400,000 should be maintained



to ensure program continuity. Additional balances 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 2022 is \$520,427; however due to increased costs it will be a negative balance by 2025 without the proposed fee changes.

In summary, the fee rates in this business plan will provide the SFRA with long-term sustainability and continuity of operations. The program will also have the ability to fund improvements when necessary, as well as afford costly and unplanned emergency expenses. This is shown in Tables 7 and 8 below. For instance, in 2022, salaries and benefits alone total \$577,021. In 2025, these two line items will total \$791,860 and by 2027, the total for salaries and benefits will be \$803,178. To put it simply, without a fee increase, the SFRA would not be able to retain staff and would therefore have to reduce or eliminate services.

**Table 7. Projected Budgets and Revenues Each Year in Dollars**

<b>Budget Items</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
<b>Salaries</b>	383,181	416,096	431,381	470,066	508,750	547,434
<b>Overtime</b>	2,000	2,000	2,159	2,332	2,504	2,676
<b>Benefits/Health insurance</b>	188,840	188,268	204,819	221,794	238,769	255,744
<b>Public Notices</b>	500	500	572	630	688	747
<b>Travel</b>	250	250	250	295	339	384
<b>Office supplies &amp; equipment</b>	1,500	1,500	1,500	1,500	1,500	1,700
<b>Vehicle maintenance</b>	3,500	5,500	4,552	4,897	5,243	5,588
<b>Building &amp; Grounds</b>	3,000	3,000	3,581	4,046	4,510	4,974
<b>Utilities - gas, power, phone</b>	4,000	6,000	5,659	6,146	6,634	7,122
<b>Contract professional services</b>	1,000	1,000	2,500	2,500	2,700	2,700
<b>Lease payment vehicles</b>	16,000	16,000	17,587	20,642	23,698	26,753
<b>Contract services – toilets</b>	64,500	70,000	73,808	79,678	85,548	91,418
<b>Accounting fees</b>	40,920	40,920	56,314	63,833	71,351	78,870
<b>Search and Rescue fund</b>	10,000	10,000	10,000	10,000	10,000	10,000
<b>Scholarship fund</b>	1,000	1,000	1,000	1,143	1,286	1,429
<b>Discretionary fund</b>	1,000	1,000	1,200	1,200	1,400	1,400
<b>Slickrock Trail dumping fees</b>	25,000	27,500	28,668	31,475	34,281	37,087
<b>Fuel</b>	7,500	7,500	8,498	9,383	10,268	11,153
<b>Uniforms</b>	2,000	2,000	2,250	2,250	2,500	2,500
<b>Printing and publishing</b>	15,000	20,000	19,456	20,232	21,007	21,782
<b>Insurance</b>	715	1,200	1,137	1,264	1,390	1,516
<b>Supplies &amp; equipment</b>	12,000	12,000	12,565	13,283	14,000	14,718
<b>Capital improvements</b>	250,000	200,000	100,000	70,000	134,000	134,000

<b>Capital Equipment</b>	0	0	0	25,000	28,000	0
<b>Inventory</b>	1,200	1,200	1,241	1,279	1,317	1,356
<b>Inventory office</b>	1,000	1,000	1,257	1,299	1,341	1,383
<b>Inventory tools</b>	1,500	1,500	2,300	2,300	2,300	2,500
<b>Campground host</b>	3,000	3,000	3,929	4,557	5,186	5,814
<b>Staff training</b>	500	1,000	1,000	1,000	1,500	1,500
<b>Restoration/Revegetation</b>	1,000	1,000	1,000	1,179	1,357	1,536
<b>TOTAL Expenses</b>	<b>1,041,606</b>	<b>1,041,934</b>	<b>1,000,184</b>	<b>1,075,200</b>	<b>1,223,368</b>	<b>1,275,784</b>
<b>Fee Revenue</b>	700,000	706,000	723,020	744,077	765,135	786,193
<b>Youth Initiative Grant</b>	10,000	10,000	12,143	13,196	14,250	15,303
<b>Online Group Campsite Sales</b>	95,000	95,000	97,019	98,533	100,047	101,561
<b>Interest and Expense Reimbursement</b>	3,700	3,700	3,700	3,700	3,700	3,700
<b>TOTAL Revenue</b>	<b>810,001</b>	<b>814,700</b>	<b>835,881</b>	<b>859,506</b>	<b>883,132</b>	<b>906,757</b>

**Table 8. Projected Fund Balances Each Year Without and With Modified Fees, in Dollars**

Categories	2022	2023	2024	2025	2026	2027
<b>Fund Balance or Debt at Beginning of Year</b>	752,032	520,427	293,193	128,890	--86,804	-427,040
<b>Subtract Difference Between Expenses and Revenue</b>	<b>231,605</b>	<b>227,234</b>	<b>164,303</b>	<b>215,694</b>	<b>340,236</b>	<b>369,027</b>
<i>Fund Balance End of Year Without Fee Change</i>	<i>520,427</i>	<i>293,193</i>	<i>128,890</i>	<i>--86,804</i>	<i>-427,040</i>	<i>-796,067</i>
<b>Projected Fund Balance at Beginning of the Year with Fee Change</b>		520,427	468,193	478,890	554,342	505,252
<b>Subtract Difference Between Expenses and Revenue</b>		<b>227,234</b>	<b>164,303</b>	<b>215,694</b>	<b>340,236</b>	<b>369,027</b>
<b>Fund Balance</b>		293,193	303,890	263,196	214,106	136,225
<b>Projected Additional Revenue with Day Use Fee Change in 2023. Changes to Camping and Annual Pass Fee implemented in 2025*</b>		175,000	175,000	291,146*	291,146	291,146
<i>Fund Balance End of Year With Fee Change</i>		<i>468,193</i>	<i>478,890</i>	<i>554,342</i>	<i>505,252</i>	<i>427,371</i>

**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 used both methods to support the need to increase fees for use of the developed recreation sites.

#### **Cost Recovery Fee Calculation Method:**

The SFRA is a self-sustaining entity and has been for the last 24 years with all operating costs paid for by SFRA collected fee revenues. See Table 4. *Total Expenditures and Revenue 2017-2021*

If this proposal is approved, the bulk of the additional fee revenue will go toward offsetting rising operational expenses (especially salary and benefits) which are 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 2017 to 2022, wages have increased by 53% and benefits by 51%. Toilet cleaning, pumping and septage disposal costs have increased by 63%. Trash collection service costs have increased by 73%. 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 planned improvements with the proposed fee increase without an impact to existing services.

#### **Impacts from Changing and Not-Changing Recreation Fee Rates**

The Sand Flats fee is not a federal fee, but is rather a Grand County fee. As such, federal passes such as the America the Beautiful pass are not honored for discounted rates.

#### **Anticipated Results of Fee Increase**

The operation of the SFRA would be impossible without the revenue stream that it engenders. The fee for use of the SFRA, including camping, has been in place since 1995. The fees The SFRA fee has not been raised since 2015; in that time period, costs (especially labor) have increased substantially as outlined above. This fee increase will allow Sand Flats to continue to pay for existing labor and operating costs and to maintain amenities while offering great visitor service and satisfaction. Fee increases are modest and comparable with BLM-Moab's camping fee rate. The proposed fees are substantially less than that charged by nearby state and National Parks.

If fees were raised, services could continue to be offered at a high level in the SFRA. In addition, with a fee increase, some revenues could be used to gradually improve the infrastructure in the SFRA. Developed recreation facilities and amenities would deteriorate due to lack of maintenance.

#### **Anticipated results of not modifying fee rates**

If the SFRA fee increase proposal were 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 and natural resources. In addition, the safety of the visitor (in terms of clean toilets, developed recreation facilities and implementation of travel management) would be lessened if services could not be maintained.

### **Effects of the Fees**

The fees collected at Sand Flats are utilized to maintain a model recreation area, a partnership between Grand County and the BLM. Many types of recreationists are provided for in an area that is just two miles from the town of Moab. Over the years, improvements have been effected with the fee money, as Sand Flats strives to maintain a fund balance that can be used to fund larger projects, such as the trailhead at Hell's Revenge Jeep Trail and construction of new trails.

### **Effects to Recreational Users**

Recreational users have expressed a high degree of satisfaction with the use of their fee money. All fee monies are used on-the-ground to improve the operation of the recreation area. Visitors and locals alike can see the effects of their fee monies, and often comment on the improvements made from year to year.

### **Effects to the Local Economy**

The Grand County economy is almost wholly dependent upon tourism. Many visitors prefer to camp at public campgrounds such as at Sand Flats; many visitors delight in being able to camp adjacent to their chosen recreational activity. Those enjoying day use of the SFRA, whether biking, jeeping or hiking, are often staying in adjacent hotels; overnight lodging visitors provide the highest economic benefit of any group of visitors. Were the recreational opportunities at the SFRA not within close proximity, some of these visitors might chose to go elsewhere. The loss of these overnight visitors would have a noticeable impact on the Grand County economy. In 2015, Headwaters Economics in *The Economic Value of Public Lands in Grand County* found that the economic impact resulting from expenditures on BLM Lands (including SFRA) in Grand County by non-local visitors amounted to \$177,080,722 (in a county with a population of less than 10,000 people). Furthermore, the study found that the attraction of Grand County is the variety of recreation opportunities in close proximity to town. Nowhere is this more apparent than the variety of recreational experiences to be found in the SFRA.

### **Effects to the Environment**

The operations at SFRA, including the campground program, significantly reduce negative impacts to natural and cultural resources that are often associated with higher levels of visitation in a small area. Prior to 1995, the Sand Flats area suffered pronounced environmental degradation due to irresponsible recreation practices. The establishment of the fee program allowed improvements to be made which guided visitors to responsible recreation with resulting improvements to the environment. For example, trailheads were established which decreased parking at will, with its resultant crushing of vegetation and compacting of soils. The campground program was established and campsites that were in or adjacent to cultural sites were eliminated;

campgrounds were built where impacts to resources were low. By providing campgrounds, impacts of overnight use are contained to small areas. Human waste generated by visitors is likewise contained and processed properly at approved facilities. Garbage is collected and disposed of properly. Fires are allowed only in metal fire rings, reducing the likelihood of a wildfire.

As most visitors come to SFRA to either bike, hike, motorcycle or jeep, the clear marking of the trails (which is paid for by the fee program) has led to decreased environmental impacts. This has enabled these famous trails to receive a great deal of use without the usual degradation accompanying such a level of use.

The fee program has resulted in a transformation at SFRA, which is Moab's "backyard". Oftentimes, public lands near to towns show environmental degradation due to overuse. The fee program has enabled the establishment of infrastructure which has mitigated the environmental impacts that are often seen in the urban-rural interface.

### **Socioeconomic Effects, including to Low-Income Populations and Environmental Justice Communities**

While those who vacation away from home are more likely to be above-average in income, the SFRA offers a very low-cost alternative to staying at a hotel in Moab, or at a commercial campground. This low-cost alternative is particularly important at the group sites, where groups such as Scouts, youth and others, can enjoy the amenities of the Moab area at a very affordable price.

Low-income populations have been identified within Grand County. (See <https://ejscreen.epa.gov/mapper>). The U.S. Census Bureau, however, has determined that low income data for Grand County is considered very unreliable, due to sampling error inherent with small populations. This makes a confident identification of this Environmental Justice population problematic. No other Environmental Justice populations have been identified in Grand County.

Thus, low-income visitors to SFRA are more likely to be Grand County residents (who are not camping, but rather wish to visit the SFRA for the day). Residents are well aware of the program which enables them to earn an annual pass by volunteering for a day of work. Anyone who expresses a problem with paying the fee is directed to the next volunteer work day. Even with the current fee increase, the volunteer program will remain an option for those who find the new fees unaffordable.

### **Public Outreach**

Public outreach on the *Draft Updated Business Plan for Sand Flats Recreation Area* was solicited for 15 days from March 30, 2023 to April 16, 2023. The proposed fee increases for 2023 were approved by the Grand County Commission at its December 2022 meeting and the Sand Flats Stewardship Committee in July 2022. A copy of the draft business plan will be made available at the BLM Moab Field Office and posted online at: <https://www.blm.gov/office/moab-field-office>.

Prior to increasing fees, the BLM Moab Field Office and Grand County conducted the following outreach efforts to notify the public of its opportunity to review and comment on the draft business plan:

- Posted an announcement at the SFRA contact station and on all recreation area kiosks
- Issued a news release to statewide print and broadcast media
- Posted the draft business plan on the BLM Moab Field Office and Grand County websites
- Prepared an information sheet distributed from the BLM Moab Field Office to persons requesting information about the proposed fees

The SFRA presents the fee proposals to the BLM Utah Recreation RAC for its formal review. The Utah RAC is an 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.