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То:	emnrd-parkscomments, EMNRD
Subject:	[EXTERNAL] NM State Parks Fee Adjustment Comments
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I am a CO resident that yearly purchases a NM non-resident fishing license plus HMAV and Habitat Stamp along with the Annual Day Use Pass to fish the San Juan River tail-water below Navajo Dam. The development of Navajo Dam State Park and the creation of an exceptional trout tail-water fishery and regional economic driver would not have occurred without US tax funds allocated to the Bureau of Reclamation in the early 1960s. Thus, changes to fee structure for resident and non-resident users for Navajo Dam State Park that generates revenues greater than its expenses should be equitable for all users.

I attended the 11 Mar 2024 information and comment meeting at the Navajo Dam State Park visitor center. Because the NM Parks system is primarily operating as an enterprise program receiving 70-75% of its revenue from user fees, it is critical that fees be adjusted to meet the demands to effectively operate. An enterprise program is quite similar to retail and service providers throughout NM that do not discriminate between resident and non-resident customers and clients when charging for services. Consequently, any differential in resident and non-resident fees is unreasonable. Non-resident visitors undoubtedly add to the economic base to locations having NM Parks and could be negatively impacted if non-resident fees are excessive.

At the meeting I expressed my viewpoint on some issues:

1. Elimination of the Annual Day Use pass would create an undue burden on regular users. It seems that online purchase of an Annual Day Use pass (perhaps same for camping pass) good for a calendar year and mailed to the purchaser would substantially reduce administrative costs. This annual pass option must be retained, consistent with other neighbor states. An increase from \$40 to as much \$80 for the Annual Day Use pass for all users is warranted. According to the Table 14 fee analysis report, an increase to \$80 exceeds the inflation adjusted \$60 fee of an Annual Day Use pass.

2. The plan to eliminate the resident Day Use fee and doubled fee for non-residents is flawed (loss of nearly \$900K of revenue, some of which would be recovered for non-resident use). While the intended goals of eliminating a resident Day Use fee (increase youth outdoor recreation participation and build future NM Park user base) is commendable, the loss of revenue and potential negative impacts is not beneficial. As admitted at the meeting, there is no data that the goals of eliminating resident Day Use fee will be achieved; don't make this an "experiment" that is loaded with negative consequences. Nearest neighbor states have Day Use fees for all visitors. Other attendees stated the Day Use revenue could be used to develop outreach activities to increase desired youth recruitment and build the NM Park user base. Furthermore both lake and river users expressed alarm for the negative impacts from increased number of visitors with eliminating a resident Day Use fee (parking issues, overuse of natural resources and infrastructure, increased park maintenance and personnel interactions). Day Use fees must be retained for all users to support the Park enterprise programs.

3. Park users should be given the opportunity to review and offer comments to the followup fee structure revision. While a 30 day comment period is intended following revision, it seems unlikely that the timeline for 1 July 2024 implementation will be received. An attendee cautioned moving too fast; the many changes are complex and may have unintended consequences.

Thank you for your efforts in addressing the necessary fee changes to attain a sustainable NM Park enterprise program. I support Option 5 Fees Adjustment, that does not discriminate between resident and nonresident Day Use Fees and retains the Annual Day Use pass.

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