

From: [Pauline Ellis](#)
To: [emnrd-parkscomments, EMNRD](#)
Subject: [EXTERNAL] Comments on Proposed Changes to Fee Structure and Park Rules
Date: Friday, March 29, 2024 2:18:47 AM

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Dear Responsible Officer:

I am a retired United States Forest Service employee that worked on National Forest assignments throughout the country during my 37-year career. I was in managerial positions responsible for engineering, lands and recreation at various units and therefore was involved in many complicated public lands management decisions. I appreciate the complexities involved in your current decision-making challenges.

I am currently a resident of Southwest Colorado. Each year I purchase a New Mexico non-resident fishing license (plus HMAV and Habitat Stamp) along with the Annual Day Use Pass primarily 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 United States Federal tax funds allocated to the Bureau of Reclamation around the early 1960s. Changes to fee structure for resident and non-resident users for Navajo Dam State Park that generates revenues greater than its expenses should be somewhat equitable for all users.

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. Non-resident visitors undoubtedly add to the economic base to locations having New Mexico Parks and will be negatively impacted if non-resident fees are excessive.

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 should be retained. An increase from \$40 to as much as \$150 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 double the fee for non-residents is flawed (loss of nearly \$900K of revenue, only some of which would be recovered for non-resident use). While the intended goals of eliminating a resident Day Use fee to increase youth outdoor recreation participation and build a future New Mexico State Parks user base is commendable, the loss of revenue and potential negative impacts are not beneficial. There is no data that these goals will be achieved by eliminating a resident Day Use fee (as admitted by State Park representatives during the meeting at Navajo Dam State Park); please don't make this an "experiment" that is loaded with unintended

negative consequences and based on flawed hypotheses. Day Use revenue could be used to develop outreach activities to increase desired youth recruitment and build the New Mexico State Parks user base. Furthermore both lake and river users have expressed alarm over the unavoidable negative impacts from such greatly increased numbers of visitors with elimination of a resident Day Use fee (parking issues, overuse of natural resources and infrastructure, increased park maintenance and personal interactions). Day Use fees should be retained for all users to support the Park enterprise programs and to reduce impacts to the Parks.

3. Park users should be given the opportunity to review and offer comments to the follow-up 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 realistic. Many have cautioned against moving too fast; the many changes are complex and may have unintended consequences if not carefully first vetted.
4. I probably average (year-round, including extended lodge stays) 3 days per week on the river in the Navajo Dam State Park. That would translate to \$800/year for me for day use under the new proposal. Charge me double or triple for my annual pass, but having to pay \$800 annually seems out of proportion.
5. Eliminating day use fees for New Mexicans could have unintended consequences, including increases in trash, and impacts to resources (including the fish and the land). Mitigating such impacts will take revenue. A

negative impact on the presence of a healthy trout population in a world class fishery that is a major generator of recognition and tourism revenue would be devastating to the local and state economies.

6. Fees should be commensurate to use. That means anyone who uses the State Park should also pay for the use and help carry the load. I totally get out-of-state users paying more, but if increased revenue is needed to support the State Park system, I'm not sure how eliminating day use fees for New Mexico residents contributes to the goal. Multiple sources for revenues would seem to make sense.
7. Fees should be used in the areas they are collected. More money collected at Navajo State Park should be re-invested into Navajo State Park. Sometimes difficult decisions must be made. One such decision would be to CLOSE State Parks with low use or that generate the least income in proportion to the operating costs. While it is admirable to want to have State Parks present throughout the State, I am reminded of the fact that National Forests across the country had to make difficult decisions to close popular recreation facilities because there was not enough money to keep all of the facilities open.
8. Out-of-State users contribute to New Mexico's tourism base. I personally contribute greatly to New Mexico's economy in the following ways: a) I hire many New Mexican fishing guides throughout the year. b) I take extended stays on the river in fishing lodges. c) I frequently buy from the local fly shop. d) I eat meals, buy gas, and buy merchandise in New Mexico. e) I

continue to bring numerous other users, both individuals and groups (including many New Mexicans), to the State Park, who similarly contribute to New Mexico's economy.

9. Caretakers: The Four Corners area is connected by so many things: shared watersheds, shared tourism base, shared businesses, etc. I hope this would be a consideration when making plans that will affect your partners, regardless of state boundaries. I maintain that frequent paying users like me love and care about "our" State Parks, and work hard to ensure we do not contribute or cause excessive negative impacts.
10. Some non-residents give back generously. We pick up trash, conduct water quality testing, try to reduce our footprint on the landscape. We would like to feel that consideration would be given to those non-residents who are your neighbors. One way to do that would be to treat non-resident users within 60-75 miles from their favorite New Mexico State Parks the same way as New Mexican residents are treated.
11. It is totally acceptable to come up with a solution that is not "one-size-fits-all". The unique conditions at Navajo Lake State Park merit special consideration.

Thank you for your efforts in addressing the necessary fee changes to attain a sustainable New Mexico State Parks enterprise program. Thank you for considering my input.

Sincerely,

/s/ Pauline E. Ellis

Pauline E. Ellis
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