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To: [emnrd-parkscomments, EMNRD](#)
Subject: [EXTERNAL] New Mexico State Parks Fees Study
Date: Sunday, March 3, 2024 1:39:47 PM

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Good day,

I'm writing in response to your request for comment regarding the proposed State Park Fee changes. Initially my shock was the across the board increase of approximately 60% (Senior ACP holder would increase from \$100 to \$160) - which is what we've used for 3 years now.

Now having read the "Operational Impacts of Annual Camping Passes" on pg. 11/12 (which I've used below to document my responses in 'blue' I was utterly shocked at these findings and the lack of any suggestions to correct them. Or is it just simpler to increase the fees rather than correct the issues that have brought the State Parks to this revenue loss fee study.

OPERATIONAL IMPACTS OF ANNUAL CAMPING PASSES (Pg. 11/12)

Annual Camping Passes, while creating a substantive amount of revenue for the Division, also have significant negative impacts on State Park operations. These are summarized below.

RESPONSE: After reading through the items below, there appears to be several issues that need to be addressed.

1. Has there been a review of these items that would all under the State Parks Enforcement Division for ACP's?
2. Can the current reservation system be upgraded to function in a manner congruent with the State Parks Rules for ACP's?

ACPs Cost the State Revenue

ACPs are exceptionally cost-effective for State Park visitors. A non-resident ACP holder can stay in State Parks for free after 22 days of camping, aside from any electric or sewer hook-up fees applicable to their campsite (\$4 per hook-up, per night). For a resident ACP holder, their stay is free after only 18 days of camping. The state sees no revenue from further camping from ACP holders.

RESPONSE: I'm interpreting the above paragraph that there is actually a rule that allows for State Parks to NOT charge non-resident ACP holders for their stays exceeding 22 days of camping? And then also the same rule applies to why State Parks DON'T charge resident ACP holders for their stays exceeding 18 days of camping?

1. If the "state sees no revenue from further camping from ACP holders" due to this rule, then why not remove it by cancelling this option for ACP holders?

ACPs Reduce Access to High-Demand Camping Sites

ACP holders have an advantage over pay-by-day users when reserving high-demand campsites: they can afford to stay longer, e.g., over holiday weekends. This advantage reduces the number of State Park visitors able to experience the most desirable park facilities.

RESPONSE: In all fairness, I understand why the pay-by-day users would like to have access to the more desirable campsites - referring to weekends and holidays. As Resident ACP holders, but not extended stay campers, we have found the high-demand campsites are always reserved when we check out the 6-months.

1. Have you looked into the instituting a "Black-Out Date" schedule? Many resorts/hotels and ski resorts utilize this in their reservations systems.
2. Schedule the Black-Out Dates for the ACP holders to include Friday, Saturday, Holidays, and Holiday Weekends (this would leave Monday through Thursday available).

ACPs Encourage Non-Recreation Use of State Parks

The combination of the New Mexico ACP's affordability and its conferral of unlimited length of stay privileges on pass-holders has, in some cases, created an opportunity for non-recreational use of State Parks: essentially, the ACP becomes a domestic living pass for many New Mexico residents and visiting non-residents, who dwell in State Parks for free.

As an illustrative example, consider an ACP holder who spends 14 days - the maximum stay - in a State Park that offers full amenities, including restrooms, tables, grills, shelters, a campground host, and law enforcement. The ACP holder must then leave that State Park for at least six days before returning for another fourteen-day stay. ACP holders who are taking advantage of the pass will move to another State Park - free of charge - for those days and then return to their preferred State Park for another fourteen-day stretch. This type of use stresses facilities and infrastructure and increases operations costs, for little one-time revenue.

RESPONSE: This is perhaps the most confusing part of the ACP holders rules.

ACP-holders should pay for those 6 days that are being referred to as “free of charge” when they take advantage of the pass for the 14 days limits.

1. My interpretation of the revenue loss:

Camper stays in State Park from May through August, every 14 days moves to another State Park. They would have moved approximately 5 times - which would be 30 free days (5 x 6 days) - revenue loss of 30 days x \$10.00 would be \$300.00. Then multiply that lost revenue of \$300 per each ACP holder that utilizes this option.

2. How does an ACP holder obtain “free of charge” camping for the 6 days they leave their preferred State Park? Where is this written?

An analysis of ReserveAmerica reservations shows that this non-recreational use of ACPs is frequent enough to be a genuine problem for State Park operations. While ReserveAmerica does not track the use of every ACP within the State Park system, it does provide a reasonable snapshot of ACP use within a given year. State Parks used ReserveAmerica to look at ACP use patterns in the southwest region of the state during FY19. This region includes the largest park, Elephant Butte Lake State Park, as well as Caballo Lake, Percha Dam, City of Rocks, Rockhound, Leasburg, and Pancho Villa State Parks. These State Parks are very popular throughout the year, due to their water resources in the summer and their temperate winters, attracting “snowbirds” and visitors who travel year-round to campgrounds across the state and country.

This analysis showed that there were 52 ACPs used for more than 28 days in FY19 in the southwest region. The majority of these passes were held by out-of-state visitors (39), while only 13 pass-holders resided in New Mexico. Of those 52 passes used for more than 28 days, one pass-holder resided in State Parks for an entire year; another for 7.4 months; another for 6 months; three pass-holders resided in parks for 3.7 months; and two more for 3.2 months.

RESPONSE: Given the “free days” identified previously for resident ACP holders after only 18 days of camping - here is my interpretation and calculation of lost revenue for those non-recreational use campers stated above. This is a completely NEW benefit from my experiences over the past decade.

1. The resident ACP holder that resided in State Parks for an entire year resulted in \$3,470.00 lost revenue (365 days less 18 days (assuming they paid for these) is 347 days at \$10.00/night)

2. The resident ACP holder that resided in State Parks for 7.4 months resulted in \$2,070.00 lost revenue (365 / 12 mos. = 30.4 avg. days in month, multiplied by 7.4 months = 225 days less 18 days (assuming they paid for these) is 207 days at \$10.00/night)

3. The resident ACP holder that resided in State Parks for 6 months resulted in \$1,640.00 lost revenue (365 / 12 mos. = 30.4 avg. days in month, multiplied by 6 months = 182 days less 18 days (assuming they paid for these) is 164 days at \$10.00/night)

4. The resident ACP holders that resided in State Parks for 3.7 months resulted in \$940.00 - for all 3 ACP-holders a total of \$2,820 lost revenue (365 / 12 = 30.4 avg. days in month, multiplied by 3.7 months = 112 days less 18 days (assuming they paid for these) is 94 days at \$10.00/night)

5. The resident ACP holders that resided in State Parks for 3.2 months resulted in \$790.00 - for all 2 a total of \$1,580 lost revenue (365 / 12 = 30.4 avg. days in month, multiplied by 3.2 months = 97 days less 18 days (assuming they paid for these) is 79 days at \$10.00/night)

6. Total lost revenue for the above resident ACP-holders is \$11,580 (based on the \$10/night fee). If all of the ACH holders accessed water and electric, then the total nights of 1,158 multiplied by \$8.00 /night would be another \$9,264.00 of revenue loss.

Finally, the issue isn't the revenue loss from the sale of the ACPs, but from the rules that allow campers “free stays” after meeting an obscure rule of 18 days for residents (as identified previously).

These long-stay pass-holders moved from State Park to State Park to ensure that they did not violate the fourteen-day stay limit – while functionally living rent-free in State Park campgrounds.

RESPONSE: The above paragraph states that the pass-holder is NOT violating the 14-day stay limit, yet the following doesn't add up.

1. How do they schedule reservations for the nights they live “rent-free” in the State Park campgrounds?

2. How does the State Park Campground Host manage those reservations?

3. Do the State Parks need to update their rules for this type of “rent-free” camping?

ACPs allow the manipulation of the reservation system resulting in negative impacts to other customers.

Currently ACP holders can utilize their ACP to reserve sites through ReserveAmerica by only paying the reservation fee. ACP holders can use the same ACP for several sites within the same park, or at several different parks even though they will only utilize one site. This multiple booking prevents other users from reserving sites and causes excess work for staff to verify reservations and ACP passes and cancel reservations that are not used. Sites that are reserved and not used cause a loss of revenue for the Division.

Visitors utilize the ACP to save camping sites especially on busy holiday weekends.

The use of an ACP allows the holder to leave their RV or camping unit in campsites without payment of fees allowing visitors to leave camping equipment in sites essentially reserving the site.

RESPONSE: The paragraph points directly to the current reservation system for the issues that negatively impacts customers and revenues. The reservation system needs to have the capability to verify the ACP holder and limit their reservations to only ONE CAMPGROUND site during the dates they are requesting. At a minimum, the reservation system must function in a manner congruent with the State Parks rules. This has apparently been a long standing issue in the application.

Our experiences: We have been approached by Out-of-State campers who have reserved multiple sites using the same ACP holder number. Same days, multiple sites.

They arrive to pick the best of the sites and cancel the others. But they still reserve and pay the cancellations fees.

The reservation system does nothing with the number? No redundancy of validation check?

Summary: As Resident Senior ACP holders, the 60% increase would no longer be an option for us. A recommendation would be to fix current system that has glaring holes in its function before proceeding with these proposed extravagant increases. Remove all such "loopholes". Get an online reservation system with checks built in.

Thank you for taking the time to read my response to the fees study. Hopefully, there will be others who can see the impact of the changes to the residents of the state of New Mexico - young families and senior citizens. I understand that there is a cost to maintaining the state parks, but perhaps a less aggressive stance towards an increase would be more accepted. If you are looking at serving the residents of New Mexico, please take another look at these proposed changes.

Thank you for your time,

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