

Mr. Toby Velasquez
Director of State Parks
1220 South St. Francis Drive
Santa Fe, NM 87505

Cc: Governor Ms. Michelle Lujan Grisham
Mr. Dylan Fuge Deputy Secretary of Energy, Minerals and Natural Resources
Mr. Lancing Adams Acting Cabinet Secretary, New Mexico Tourism Department

October 01, 2024

Re: NM State Parks fees "survey / project"

Dear Mr. Velasquez,

I'm submitting comments anonymously, because NM State Parks (NMSP) staff post comments on the internet, including commentor's name, address, email address, etc., without permission nor having provided notice. My comments are provided to others in government and media with the hope they won't be excluded by NMSP staff, because it seems that preventing sound, fair planning, including meaningful public involvement, was the "project's" intention, after review of the "project publications" (<https://www.emnrd.nm.gov/spd/public-meetings/> and <https://www.emnrd.nm.gov/spd/wp-content/uploads/sites/7/Revised-Fee-Recommendations-Summary.pdf> and <https://www.emnrd.nm.gov/spd/wp-content/uploads/sites/7/Revised-Fee-Increase-Presentation-for-posting-to-web-5.31.24.pptx>).

I'm an annual camping pass user and knew nothing about the "project" until I coincidentally saw a reference in the media, not until summer 2024, years after it supposedly started. The "project" made no effort to include the population of pass holders or frequent campers, nor were any notices of the "project" posted on campground bulletin boards or web pages regularly used by a camper. The "project" "results" are heavily weighted from your own staffs' opinions and preferences, and from a few people from a few towns, which you chose, who read obscure notices in an obscure newspaper.

The "project's" approach and publications - and lack thereof - claiming to need revenue, then using your own staff's suggestions instead of obtaining data, context, market research, and users' values are incomplete, flawed, biased, unfair, nearly unintelligible, and therefore lacking in principles and methodologies used by professional social surveyors and public land planners. And they beg the questions - are SPs even intended to exist as for-profit, or self-sustaining ventures? I've never heard of one that is, but unless they are, your staff pitting different user groups against one another for their assumed asserted ability to hit your revenue goals, is counter to what public administration is supposed to do.

As a public resource, it's the state's job to raise taxes, not pit different user types against each other to find who can pay the most. Increasing fees to charge campers, especially non-resident campers, closer to what it would cost to stay in local lodging (for your non-potable, brown, drinking water, unreliable intermittent electric service, views of decrepit adjacent properties, and

significant light pollution at night) is not the answer. Furthermore, were the NMSPs 100% paid for with state funds? And no federal funds? Doubtful. For a state that earns so much from tourism, the discrimination between residents and non-residents seems extreme and ill-advised, and your "resident discount" assumption, that non-residents are not also paying taxes in NM, is incorrect. And since you've proven you don't believe you should provide an actual, or at least visual, buffer around user sites, why not use some NMSP land to subsidize costs and optimize profitability with hydroelectric generators and solar and windmill farms?

You should fund your agency primarily from tax coffers (including from all residents and resource users who have historically been heavily subsidized, like ranchers and railroads), or grants, or corporate partnerships. Even when you raise your fees, that's not going to solve the problem that you don't enforce your own rules or collect fees that already exist. Every park should have staffed entry / roaming staff collecting fees from all users, including day-use fees for those who spoil the camping experience by cruising non-stop through the campgrounds in vehicles. If you did that, you'd see how many fees you've been letting fall through the cracks. Where is that chapter in the "study"? If revenue is so important, why not install license plate readers, traffic cameras, and use drones to monitor the SPs? You could charge users effectively and cheaply that way, remotely, from one tech center, with fewer staff.

Note, your staff's claim that KS state's annual camping passes are only for residents is incorrect.

Also, contrary to your "reporting", no camper I have encountered appreciates or considers the reservations vendor as a convenient or good thing. It is unnecessarily and unreasonably costly to users, the web pages are incomplete and contain many factual errors to the point of being laughable, are confusing, and the staff are unempowered to help customers. And one cannot even use that system in the many parks where there is no cellular service. The policies and fees are so nonsensical that an annual pass holder will be charged more to cancel or change a reservation than the site cost to reserve in the first place. Why would anyone cancel under those circumstances? Answer - they don't, at least not after the first experience. That's one of the reasons you may think your campgrounds are busier than they actually are, because you make it ridiculously difficult and even cost prohibitive to change or cancel a reservation.

Also, your staff's statements that annual pass campers are "camping for free after a certain number of nights [in a given year]" (I believe it was stated 22 nights, but it is in the record) is incorrect, and, that per night "analysis", which clearly ignores the intent of an annual pass's discount, is obnoxious, and the pejorative accusation is unacceptable to apply to people who are simply using the service they paid for. An RVer with an annual camping pass is still required to pay a reservation fee of at least \$12.00 for each stay, despite that they bought an "annual pass", and is also still paying for one utility, at least, so the cost is additionally \$4.86-\$16.00 **per night** (depending on the length of the stay) in addition to the purchased annual camping pass fee. And, many of your camp sites and or utilities are not available in colder months, so campers are necessarily limited to fewer of the total parks; and in those your staff still close most of a park's sites during much of the year.

The "study" should not be comparing all NMSPs with each other. I've not been to every state park, but have camped in a third of them, and they were not all created equal. A few are beautiful and I

would agree “special”. Those were also very small with limited campsites – that is due to geography or your own limited infrastructure. But most NMSPs have mid-century, parking lot-style campgrounds built around man-made lakes, with little or no shade, significant light pollution at night, and often with a close view of adjacent decrepit properties.

And, the usually mostly empty parks should be separated and treated differently than the few most popular parks. In my experience, NMSPs are mostly empty, most of the year. I have never seen any of the eastern parks full or even close to full except for the summer holiday weekends. And many users arrive late, camp for 1 night, and leave early, as they are probably only travelling through, could stop over elsewhere, (and “are not recreating”, so should be prohibited, according to your staff). Your staff's published claims that annual pass holders are taking opportunities away from what your staff believes are more worthy campers is not only factually false, but is another reprehensible comment about pass holders who are complying with rules and bringing otherwise nonexistent business, jobs, and tax revenues to the communities where they travel. Most frequent campers comply with rules (except perhaps dog waste rules). The users who are breaking many rules are not even efforted to be monitored, caught, nor required to comply.

I'm a witness that you rarely enforce your existing rules - what is the cost of that? Why no “study” of lost revenues? Because you don't have the data, even if you wanted to consider that significant reality. Many people will never pay for camping, day use, or to dump their RV black tank unless it is literally enforced by a person or system. People arrive after hours to camp, dump tanks, and use the other facilities who aren't compliantly visiting the park, and spend hours using resources and sites they didn't pay for, and your staff aren't even monitoring that. How can you “report” anything with credibility when your staff are not even present in the campgrounds or in the high use areas of the parks 96% of any given 24 hour period?

Additionally, NMSPs should not be compared to parks' fees in other states, when those are very different places offering different experiences. Colorado SPs should not have even been included, as it's parks are or adjacent to unique, internationally desired destinations. And contrary to the other states you mentioned, the NMSPs I've experienced did not buy enough buffer land around their campgrounds to provide a natural-feeling, park-like setting for campers, and should not be comparing fees at bucolic or special places of natural beauty with those of your parks, especially those that have man-made reservoirs. NMSP campers must often view bordering decrepit private properties just a few hundred feet from campgrounds, are provided significant light pollution at night, brown drinking water, and frequent electricity outages.

Some states you listed that charge more for camping are also states with little if any federal camping options (US Forest Service, US BLM, US Park Service), so those SPs have captive audiences (and are also charging more than people are willing to pay, which is why they are also mostly empty). Some are also in recognized areas of culture, beauty, or other significance. You shouldn't expect to earn the same for man-made reservoir parking lot campsites with no shade, that have close-up views of decrepit private properties, brown drinking water, and significant light pollution at night, as the White River in AR, Escalante in UT, or Havasu in AZ do, for example. The “project” comparing some of the country's most highly regarded natural areas with your SPs is not a reasonable methodology. In addition to their better amenities and presentations, they are smaller states geographically, are open year-round, and therefore their SPs are overall more

useable. Campers in those states are travelling magnitudes fewer miles to get to their SP, unlike in NM where a camper from eastern NM would have to travel at least 450 miles round trip simply to get to the mountain parks (which are additionally much less usable because they have many fewer sites, and many are too small for the average RV, and are also partially or totally closed seasonally), conditions and costs that would be prohibitive to many, and would approach or exceed the cost of hotel-based vacations and defeat the point of camping, which for many, is meant to be a cheaper and more rustic form of recreation. MS, WV, AR, KY, and LA are all 2.3 to 5 times smaller than New Mexico. Additionally, popularity proves that users believe that some of your other comparison parks / also make a camper's overall investment seem "worth it" because those places are destinations in and of themselves, or are in the neighborhood with internationally-recognized destinations; whereas many of your SPs are essentially desert islands with no other opportunities for a hundred+ miles around. You didn't choose where the dam-able rivers are, but you did choose where to locate SPs, and chose to not create more SPs than you have (to accommodate population growth and the "overcrowding problem" your "project" has incorrectly asserted).

I believe that your "project" staff have no right to have, much less to publish, allegations of annual pass campers as "problems", or assert, without any facts, that "they are not recreating", or assert who is and who is not "recreating" with no knowledge (and probably no authority). Of my witnessing frequent campers whether they have annual passes or not, most are using parks according to how they were intended. This attitude and approach, while the "study" is ignoring and failing to acknowledge actual and more costly problems – seems outrageous to the point of gross mismanagement:

- All of the day users who don't pay and are not even monitored to see if they did pay;
- All of the campers who arrive after 5 pm and leave before 8 am, who often don't pay;
- All of the campers who steal park resources you claim to be so concerned about, or otherwise violate rules like fire restrictions; pets, often off leash; or the campers who show up and wash their RVs with campground water after your staff have left for the day; or the parties who show up with dozens of people and vehicles, and park and drive wherever they want, to name a few.

Most of your users in my experience have NM license plates, 2nd most being from TX. If what you really want is to get rid of annual pass, and out of state users, just say so, you essentially already did by calling them "problems" and recommending their future access to passes be eliminated. What good is further emptying the parks going to do for your revenue or the community citizens? Are the residents who benefit from SP users also buying food, gas, and many services ready for you to affect their jobs, businesses, and county tax revenues? I expect not.

If you really wanted to generate SP camper revenue fairly, to cover the costs of users' utilities, then utilities would be metered. Or if not metered, you would at least be charging by person and not by vehicle (which also isn't even enforced by your staff). How can you charge solo campers the same amount as the groups of two and more, not to mention the large groups that bring dozens of people onto one camp site? You should be charging for utilities by person. And you should also be charging pet-bringers with significant fees. I have never once camped in a NMSP without encountering dog feces on the ground. If having users pay more fairly, or more per actual use, as you claim is your goal, it is not fair for solo campers to pay the same as, and to subsidize campers using sites with 2 - 30 people using water and electricity (who are also usually the actual

problems: littering, speeding and driving unsafely, creating dust clouds, blaring music, killing the already limited vegetation, violating fire restrictions, letting their dogs roam and defecate, including outside of their own site, and otherwise acting inconsiderately to other campers).

If camp sites really weren't available to those that wanted them (your staff's published incorrect claim), and if you really wanted to provide fair access to a population you acknowledge is largely poor, your plan would have accommodated for that, but it did not. Your fee increases will only unfairly advantage people who can pay more (though overcrowding is not even a real condition in most SPs because they are not even half-full most of the time). If you wanted to be fair under such (nonexistent) conditions, you would have studied data to learn how many different campers did camp and or tried to, at which SPs, and then recommended solutions for those most crowded SPs such as creating a limited # of nights per camper, per SP, per year; or a lottery, so the richer campers could not over-use those parks more than or displace poorer campers. The point is, those full capacity conditions rarely exist in most parks, but even if they did, your "project" has not sought to be site-specific, accurate, or fair.

Furthermore, how can you implement your staff's fee recommendations if a camper wants to purchase electricity but not water, or vice versa? I already don't use your brown water for drinking, I bring my own. Your staff's recommendation to charge more and separately for the site utilities – a fee for the water, and a fee for the electricity, is not even a valid option, because you don't offer RV sites that have electricity but no water. And often, sites that offer water but no electricity, or no utilities at all, are significantly sloped and or eroded, or only sized for tents and not physically suitable for RVs or trailers because there is no pull-through or suitable turnaround space. How are you going to stop a camper from using water they didn't pay for in a site that has electricity that they do want to pay for? Or vice-versa? You aren't, because you already aren't monitoring users and charging existing fees most of the daytime and none of the nighttime. And as a proper "project" would have shown, tent campers also occupy RV sites because they want the electric service, because they also want the convenience of their devices and appliances.

The "project's" proposed doubled (and higher) fees and other changes are outrageous, especially when so many are still recovering from the economic fallout following a world-wide pandemic. But it seems you already decided to eliminate a large segment of your users by pricing them out of your market. Many will not be able to camp at all, and of those who can, many will choose other places to camp, often in other states, which will also receive their business, jobs creation, and tax revenues. Presumably the "project" staff will be happier with even emptier parks, and perhaps they can spend 97% of their time away from user sites, as compared to the 96% they do at present. But I believe as stewards of public resources, the agency and staff owe a higher level of competence and effort, including to not produce "studies" and "reports" which wrongly identify problems while ignoring its own failings; and which provide "project" staff's predetermined "recommendations" in lieu of proper planning.

Sincerely,

Disappointed Camper