May 17th, 2018

The Honorable Martin T. Heinrich,
United States Senate
303 Hart Senate Office Building
Washington, D.C. 20510-3104

Re: S. 2797, White Sands National Park Establishment Act

Dear Senator Heinrich:

The Board of County Commissioners of Otero County is opposed to S. 2797, the White Sands National Park Establishment Act. We believe this bill is unnecessary and that significant questions about it have not been satisfactorily answered. We are also concerned with the process surrounding the introduction of the bill.

*Boundary Adjustment*

We do support one element of the bill: the land-swap between the Department of the Interior and the Department of the Army. At present, there are in-holdings inside the monument that belong to the White Sands Missile Range. The bill eliminates those enclaves. The exterior boundaries are also adjusted to improve the management of the monument.\(^1\) We support these changes. They will benefit the monument, the Army, and the public.

*Monument vs. Park*

We do not support changing White Sands National Monument into a national park. The chief argument in favor of the change is that it will increase the number of visitors. Yet the White Sands are already the most visited of the twelve National Park Service sites in New Mexico, more visitors than Carlsbad Caverns National Park attracts. The data on the National Park Service’s website show that in 2017 there were 612,468

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visitors to White Sands National Monument and 520,026 to Carlsbad Caverns National Park.² Petroglyph National Monument, surrounded by the city of Albuquerque, had only 141,803.

Being a national park is no guarantee of popularity. Gates of the Arctic National Park had 11,177 visitors in 2017. The Statue of Liberty National Monument had 4,441,988. We question how or why the change in status would increase numbers when the monument is already popular.

The Headwaters Study Is Flawed

Your office has cited a study produced by the Headwaters Economics, Inc., that forecasts a sizeable increase in visitors to the White Sands if it becomes a national park. We are skeptical of the study.

Headwaters, a 501(c)(3) organization, is based in Bozeman, Montana, and bills itself as an “independent, nonpartisan” organization. Besides its distance from and unfamiliarity with Otero County and its people, funding for Headwaters comes almost exclusively from federal agencies and environmental organizations whose goals are anything but nonpartisan. In fact, the first sources of funding listed on the Headwaters website are the Bureau of Land Management and the U.S. Forest Service. There is something amiss when federal tax dollars are routed through a charity to produce a report that is used to lobby that same federal government.

The study produced by Headwaters is like all economic development studies: instead of working from first principles and following the evidence to a conclusion, the study works backwards from the foreordained result the funders wanted to see and searches for the theories, research, and evidence to support the desired proposition. Of course the study finds that changing White Sands into a national park will be an economic boon. These studies always say things like that. If they didn’t, groups such as Headwaters would not get future commissions to do studies.

Correlation is Not Necessarily Causation

Headwaters’s methodology was to look at the National Park Service’s visitor counts at eight national monuments that became national parks and compare the number of visitors before and after the change in status. Because it finds that the visitation numbers were higher five years after the change in status at some of the parks, the same thing would happen with White Sands. But if one looks at the details, the report does not hold together.

The report looks at visitation numbers spread out over several decades. Arches National Park and Capitol Reef National Park were created in 1971. Death Valley National Park, Joshua Tree National Park, and Saguaro National Park were created in 1994. Black Canyon of the Gunnison National Park was created in 1999. Great Sand Dunes National Park was created in 2000. Pinnacles National Park was created in 2013. So the park looks at visitation trends over a series of five-year periods spread out over nearly fifty years. The world of 1971 was very different from those of 1994 or 2013. It is not clear that the time sequences chosen are comparable.

² The statistics on visits to National Park Service sites come from https://irma.nps.gov/Stats/.
Headwaters relies on the logical fallacy post hoc ergo propter hoc. As is taught in introductory statistics classes, correlation is not necessarily causation. The study assumes that a change to national park status is the sole variable in the equation. But there are a wide range of factors that could influence visitation numbers. For example, in the five years after Arches and Capitol Reef were made national parks, the Arab oil embargo caused the price of oil to quadruple, the stock market crashed, the Bretton Woods system collapsed, and the economy began the runaway inflation that would not be tamed until the early 1980’s.

The study makes no effort to adjust for any variables besides park status. There are many factors that would affect visitation to a national park such as the cost of gasoline and travel, changes in consumers’ disposable income, the amount of media coverage of individual parks, the quantity and quality of promotional efforts by state and local visitors’ bureaus, the availability of guidebooks and maps for individual parks, changes in travelers’ tastes and preferences, the availability of camping and recreational facilities at individual parks, improved highway access to individual parks, the availability of commercial air service near parks, and community resources such as hotels and restaurants near parks. We know that Headwaters is familiar with economic statistics. Its executive director, Ray Rasker, testified about such numbers to Congress about another of his organization’s studies.3

Headwaters also assumes the national monument and the newly-created national park are the same thing before and after the change in status. That isn’t necessarily true. Joshua Tree increased in area by about 50% when it became a national park. When Arches National Monument became a national park, the acreage was shrunken by Congress. Visitation numbers could be affected simply by the change in area of the site.

Even with its sole variable of monument status versus park status, the report fails to perform even the simplest of statistical tests on its data to show whether there is any statistical significance to the correlations it claims are present. The tools to perform statistical analysis are readily available. A spreadsheet in Microsoft Excel can be made to produce chi squares and correlation coefficients. It could be that the correlation the report touts is very weak and hardly more than what could be attributed to chance. We don’t know as Headwaters fails to do the math.

Looking at the charts presented shows there is room for doubt. The report fails to give the actual visitor numbers for most years but instead presents a series of line charts. The report shows the peak year for visitors to the Black Canyon of the Gunnison was twenty-five years before it became a national park, that visitation since it became a national park in 1999 has never come close to the peak, that visitation initially decreased after the change in status, and that now, nearly twenty years later, visitation is slightly above the 1999 level.

At Joshua Tree, there was a decline in visitors soon after it became a national park and visitation remained steady for almost twenty years when it increased dramatically. According to the National Park Service website, visitation doubled from 2013 to 2017. But that has nothing to do with the change in status, Joshua Tree becoming a national park in 1994. Saguaro has had a negative trend in its visitation

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since it became a national park in 1994. Only twenty years after the change in status did visitation reach the 1994 level.

The chart for White Sands shows the peak year for visitation was long ago. The National Park Service’s data shows the peak was in 1986, when 666,879 visited. The lowest visitation since then was in 2007 when 437,042 visited. In 2017, there were 612,468 visitors, still well below thirty years ago.

Essentially the Headwaters report just assumes visitation will increase at White Sands. There is no evaluation of any factor that would lead to that assumption, e.g. consumer preferences, economics, the desirability of Alamogordo. It is simply ipse dixit, Bob’s your uncle. Even if we assume it is correct, past performance is no guarantee of future results. The report runs with its flawed numbers and then uses them to project an illusory economic prosperity that has been picked up on by the press. A similar study done by Headwaters in 2011 claiming local economies grew when a national monument was established near them was greeted with skepticism from congressmen when Mr. Rasker appeared before them. The mayor of Escalante, Utah, who testified at the same hearing stated there had been no growth in his city after the Grand Staircase-Escalante National Monument was established. Headwaters was commissioned in 2015 to study a proposed National Park Service site and found what it wanted to find, claiming a huge number of people would supposedly trek to the North Woods of Maine for the new park; Mainers were skeptical.

There are serious questions about the methodology and biases of the Headwaters report and we think it is has little value in evaluating future visitation to White Sands.

**Changed Status, Changed Rules?**

We are concerned that changing White Sands from a national park to a national monument will affect operations there. For example, White Sands has been a popular filming location for Hollywood for decades. Among the films that have shot there are the Stewart Granger version of King Solomon’s Mines (1950), David Bowie’s The Man Who Fell to Earth (1975), and Transformers (2006). Shooting here brings not only jobs and tax revenue from the filmmakers but it is free publicity for the beauty of White Sands. Hollywood is fickle and is easily swayed by financial concerns—witness the huge amount of filming in Georgia in recent years because of that state’s incentives. We are concerned that the change in status will affect filmmaking here either from higher fees or increased regulation.

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5 House Natural Resources Committee, H.R. 302, at 36-41.
6 Id. at 33-35.
**Park Improvements**

The Secretary of the Interior, Ryan Zinke, has repeatedly spoken about the $12 billion in needed work for National Park Service sites.\(^9\) The Congressional committees with oversight of the National Park Service have held hearings this year on the work that needs to be done: the House Natural Resources Committee met on March 7 and the Senate Energy and Natural Resources Committee met on April 17.\(^10\) We wonder about the backlog at White Sands. If the increased visitation predicted by Headwaters comes to pass, won’t the additional wear-and-tear from those additional visitors aggravate the existing maintenance problems?

Unlike so many other National Park Services sites, White Sands does not have camping available for anyone other than backpackers. We believe that providing camp sites should be a priority for the National Park Service. Adding a campground would be an improvement that would draw additional visitors to White Sands.

We also believe that opening up road access to the north is needed. The former State Route 52 ran from U.S. 70 at Tularosa to Engle, near Truth or Consequences.\(^11\) This was closed during World War II because of the Army and what became the White Sands Missile Range. Reopening this road would improve access not just to the White Sands National Monument but improve tourism throughout the region by making it easier to get to the Elephant Butte Reservoir.

**Consultation With the Affected Counties**

We are also troubled by the way the affected counties were consulted on this process. Tom Stewart, a Lincoln County Commissioner, was quoted in the press in December saying that you wouldn’t introduce this bill “unless both counties, Dona Ana and Otero, agree.”\(^12\) Yet the Boards of County Commissioners of both counties are opposed to national park status and have been ignored. The Dona Ana Commissioners last year rescinded their predecessors’ support for the national park.\(^13\) Our concerns

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have been expressed at public meetings and reported on in the press.\textsuperscript{14} We passed the enclosed resolution opposing the change to a national park.

But despite the opposition from the counties involved, your office decided to ignore county government and do an end-run by securing resolutions of support from the Cities of Las Cruces and Alamogordo.\textsuperscript{15} Susan Payne, a city commissioner for Alamogordo, stated "I do not think we need to be writing a letter of support for this item. I think this went before the [Otero] County [Commission] and I know the county objects to it and this is really a county issue. I think the best thing we can do is nothing at all. I don't support this, my constituents don't support this and I'm not comfortable with this."\textsuperscript{16}

You then announced the bill's introduction in Las Cruces, not here.\textsuperscript{17} When you came to Alamogordo to speak about the bill—which the press reported as a "meet[ing] with community leaders"—the Otero County Commissioners were not invited to the event. A member of the Alamogordo City Commission, a Mescalero Tribal Councilman, the mayor of Mesilla, and three candidates in the 2018 elections for the Otero County Commission were invited. But the democratically elected representatives of Otero County were not.

This is not a new phenomenon. Last year, Representative Rob Bishop, Chairman of the House Natural Resources Committee, testified that local voices on the Bears Ears National Monument were being ignored.\textsuperscript{18}


\textsuperscript{16} Melton, "City backs."

\textsuperscript{17} "National park status sought to draw tourist dollars," \textit{Las Cruces Sun-News}, May 5, 2018, at A5.

Conclusion

The Board of County Commissioners of Otero County oppose changing White Sands National Monument into a national park because we believe it is unneeded. When it is not necessary to change, it is necessary not to change. We are not convinced by the research behind the bill. We believe there are issues that have not been addressed such as facilities at White Sands. And we are disappointed by the consultation process.

BOARD OF COUNTY COMMISSIONERS
OF OTERO COUNTY, NEW MEXICO

Lori Bies, Chairwoman

Susan Flores, Vice-Chairwoman

Janet T. White, Member
cc: Thomas S. Udall, United States Senator  
Stevan E. Pearce, United States Representative  
Dara Parker, District Representative for Senator Heinrich  
Rene Romo, District Representative for Senator Udall  
John S. McCain, III, Chairman, Senate Armed Services Committee  
John F. Reed, Ranking Minority Member, Senate Armed Service Committee  
Lisa A. Murkowski, Chairman, Senate Energy & Natural Resources Committee  
Maria E. Cantwell, Ranking Minority Member, Senate Energy & Natural Resources Committee  
Steven D. Daines, Chairman, Subcommittee on National Parks, Senate Energy & Natural Resources Committee  
Angus S. King, Jr., Ranking Minority Member, Subcommittee on National Parks, Senate Energy & Natural Resources Committee  
Mitch McConnell, Senate Majority Leader  
Charles E. Schumer, Senate Minority Leader  
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Raúl Grijalva, Ranking Minority Member, House Natural Resources Committee  
Thomas M. McClintock, II, Chairman, Subcommittee on Federal Lands, House Natural Resources Committee  
Colleen Hanabusa, Ranking Minority Member, Subcommittee on Federal Lands, House Natural Resources Committee  
Ryan K. Zinke, Secretary of the Interior  
David L. Bernhardt, Deputy Secretary of the Interior  
Jason Larrabee, Acting Assistant Secretary of the Interior for Fish & Wildlife and Parks  
Paul Daniel Smith, Acting Director, National Park Service  
Sue Masica, Intermountain West Regional Director, National Park Service  
Marie Frias Sauter, Superintendent, White Sands National Monument  
Eric L. Sanchez, Commanding General, White Sands Missile Range  
Houston R. Cantwell, Commander, 49th Wing, U.S. Air Force  
Susana Martinez, Governor of New Mexico  
John A. Sanchez, Lieutenant Governor of New Mexico  
Aubrey B. Dunn, Jr., New Mexico State Land Commissioner  
William F. Burt, New Mexico State Senator  
Ron Griggs, New Mexico State Senator  
Cliff R. Pirtle, New Mexico State Senator  
Zachary J. Cook, New Mexico State Representative  
Yvette Herrell, New Mexico State Representative  
Rick Little, New Mexico State Representative  
James G. Townsend, New Mexico State Representative  
Billy G. Garrett, Dona Ana County Commissioner, District One  
Ramon S. Gonzalez, Dona Ana County Commissioner, District Two  
Benjamin L. Rawson, Dona Ana County Commissioner, District Three  
Isabella Solis, Dona Ana County Commissioner, District Four  
Kim Hakes, Dona Ana County Commissioner, District Five  
Fernando R. Macias, Dona Ana County Manager
Richard A. Boss, Mayor of Alamogordo
Jason Baldwin, Alamogordo City Commissioner, District One
Nadia Sikes, Alamogordo City Commissioner, District Two
Susan L. Payne, Alamogordo City Commissioner, District Three
Josh Rardin, Alamogordo City Commissioner, District Four
Alfonso Hernandez, Alamogordo City Commissioner, District Five
Dusty Wright, Alamogordo City Commissioner, District Six
Margaret Paluch, Alamogordo City Manager
Ken Miyagishima, Mayor of Las Cruces
Kasandra Gandara, Las Cruces City Commissioner, District One
Greg Smith, Las Cruces City Commissioner, District Two
Gabriel Vasquez, Las Cruces City Commissioner, District Three
Jack Eakman, Las Cruces City Commissioner, District Four
Gill Sorg, Las Cruces City Commissioner, District Five
Yvonne Flores, Las Cruces City Commissioner, District Six
Stuart C. Ed, Las Cruces City Manager
Bill Mershon, Chairman, Otero County Soil & Water Conservation District
Jerry Schickedanz, Chairman, Dona Ana County Soil & Water Conservation District
G.B. Oliver, Alamogordo Chamber of Commerce
Gregory J. Bose, Otero County Commission Candidate
Cøy D. Griffin, Otero County Commission Candidate
Carrie I. Ludington, Otero County Commission Candidate
Christopher S. Jones, Otero County Commission Candidate
Gerald R. Matherly, Otero County Commission Candidate
State of New Mexico
County of Otero
RESOLUTION #04-12-18/106-37
Re: White Sands National Monument

WHEREAS, Martin T. Heinrich, United States Senator, plans to introduce legislation in the Senate of the United States that would change the status of White Sands National Monument from a national monument to a national park;

WHEREAS, the proposed legislation would amend the boundaries of the White Sands to swap land currently controlled by the United States National Park Service for land controlled by the United States Department of the Army as part of the White Sands Missile Range to eliminate inholdings and make the each entity’s administration easier;

NOW, THEREFORE BE IT RESOLVED, that the Board of County Commissioners expresses its approval of the proposed boundary changes and exchanges of land between the United States National Park Service and the United States Department of the Army in order to improve administration of the White Sands National Monument and the White Sands Missile Range; and

BE IT FURTHER RESOLVED, that the Board of County Commissioners opposes the change in status of White Sands National Monument from a national monument to a national park; and

BE IT ORDERED, that copies of this resolution be transmitted to Senator Martin T. Heinrich, Senator Thomas S. Udall, and Representative Stevan E. Pearce.

PASSED, APPROVED, AND ADOPTED by the Board of County Commissioners of Otero County in a regular session on the twelfth day of April, 2018.

ATTEST:

Robyn Holmes, County Clerk
(Seal)

BOARD OF COUNTY COMMISSIONERS,
OTERO COUNTY, STATE OF NEW MEXICO

Lori Bies, Chairwoman

Susan Flores, Vice-Chairman

Janet T. White, Member
May 17th, 2018

The Honorable Merrin T. Heinrich,
United States Senate
207 Hart Office Building
Washington, D.C. 20510-3104

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Dear Senator Heinrich:

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Boundary Adjustment

We do support one element of the bill: the land swap between the Department of the Interior and the Department of the Army. At present, there are in-holdings inside the monument that belong to the White Sands Missile Range. The bill eliminates these in-holdings. The exterior boundaries are also adjusted to improve the management of the monument. We support these changes. They will benefit the monument, the Army, and the public.

Monument vs. Park

We do not support changing White Sands National Monument into a national park. The chief argument in favor of the change is that it will increase the number of visitors. Yet the White Sands are already the most visited of the 168 National Park Service sites in New Mexico, more visitors than Carlsbad Caverns National Park attracts.

The data on the National Park Service's website show that in 2017 there were 618,468


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