CITY OF BOULDER
OFFICE OF THE CITY MANAGER

March 13, 2026

The Honorable Brian Stone
Acting Director
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314

Dear Acting Director Stone:

The City of Boulder appreciates the opportunity to submit this response to the Dear Colleague letter.

Executive Summary:

The City of Boulder supports the University Corporation for Atmospheric Research (UCAR) and its continued management and operation of the National Center for Atmospheric Research (NCAR). The City of Boulder is compelled to advocate on behalf of NCAR and this critical scientific and community asset. It is the city's position that no evidence has been produced that plans to "restructure" critical weather infrastructure and laboratories located in the city would improve efficiency, achieve cost-savings or enhance the critical research and operations these labs provide to the country. The City of Boulder opposes any operations and management model that deviates from the current UCAR efficiencies. The city and community have relied upon and embraced an ownership and operating model for the Mesa Lab within the public domain, and we remain steadfast in this position. Any deviation from this model to private ownership and management would call into question the previous commitments and voter approvals for usage of the site for atmospheric science.

Introduction:

The current arrangement between Boulder as a host city and our federal laboratories demonstrates the many mutual benefits that occur when research, innovation, and entrepreneurship combine to fuel a thriving local economy. Our city's success is the product of decades of public and private investment in scientific institutions which feed entrepreneurship and foster the talent of tomorrow. NCAR – one of the nation's premier scientific research institutions – is at the heart of this model and its impact is felt both locally within our Boulder community and across the globe. Locally, the facility employs over 700 people, including engineers and scientists and is part of Boulder's broader ecosystem of research labs and institutes, which collectively contribute over $1 billion to the local economy each year. Research conducted at NCAR has repeatedly served as the foundation for new technologies, new companies and high-skilled jobs that strengthen Boulder's reputation as a hub for innovation. Since its founding, NCAR has cultivated a deeply collaborative relationship with the local scientific community, one in which advances made in the lab

are built upon, commercialized and expanded by the wider network of businesses and institutions that surround it. At a time when global competition in science and technology has never been fiercer, institutions like NCAR are critical. The city is extremely concerned that the actions proposed by the NSF are short-sighted and will negatively impact Boulder's community and our economy. These actions will also cause irreparable damage to the nation's scientific infrastructure undermining U.S. leadership at a moment when other countries are aggressively investing in exactly the kind of research that NCAR conducts.

Specific Responses:

The NSF is looking for "efficient and cost-effective operations and management of atmospheric observational platforms, cyberinfrastructure and computing capabilities, and community training on weather and space weather modeling and forecasting."
The current UCAR/NCAR model *is* the efficient and cost-effective model and was specifically designed to pool resources that no single university or agency could sustain alone. NCAR serves thousands of researchers through UCAR's 129 college and university members. Distributing its functions would cost far more, not less, and would fragment the collaborative network that makes the science productive. The City of Boulder opposes any operations and management model that deviates from the current UCAR efficiencies.

Are there any areas in which NCAR activities or capabilities duplicate those of other government agencies, universities, or the private sector?
The essential collaborative infrastructure that NCAR provides to the scientific community should not be confused with duplication. NCAR's unique value is in its capacity to treat Earth as a single integrated system, and as such, the relationships between public agencies and the private sector are deeply collaborative, not competitive or redundant. NCAR provides the foundational and experimental work that operational agencies deploy. Breaking up or privatizing NCAR doesn't consolidate this; rather it destroys the research pipeline that feeds operational capability.

Many private companies depend on publicly funded foundational research and data in order to operate. These entities are consumers of NCAR's intellectual output, not substitutes for it. Individual private companies simply do not have the ability to fund basic research with 20-year payoff horizons, or provide workforce training for early career scientists, or provide open-sourced simulation models. As such, the private sector cannot realistically be expected to fill a void that would be left if NCAR was dismantled. The City of Boulder supports the current UCAR/NCAR operating model.

Are there transformative prospects for observational platforms and the resulting data that are currently unexplored or underutilized?
The beauty of scientific exploration and research is that there are always new and unexplored opportunities. NCAR, with its wide range of expertise and cutting-edge research, is the right institution to pursue them. The current NCAR model gives the atmospheric research community the ability to tackle the most important scientific problems of the day. Disrupting their capacity to do this through fragmentation or privatization will only set us back, making the U.S. less safe, less resilient, and giving other nations around the world the opportunity to overtake our scientific capabilities.

Are there other concepts for management and operations of NCAR activities that differ from the current model that NSF should consider?

The UCAR consortium model was deliberately designed to balance federal investment with academic independence, ensure broad community access, insulate long-term research from short-term political pressure and aggregate demand across institutions that cannot individually justify the infrastructure. NCAR's open, community-serving model is a competitive advantage for U.S. science globally. The city firmly opposes any proposal to convert NCAR to a fee-for-service model, introduce commercial management or distribute functions to individual universities. Each of these would undermine the shared infrastructure rationale that justifies NCAR's existence.

When considering the future of management and operations of NCAR activities and property, the City of Boulder supports a continued model of ownership and operations within the public domain. The city firmly opposes any transfer of the land to the private sector. It is vital for NSF to honor the promises made to the City of Boulder and to the people of the State of Colorado as to the use of the property upon its acquisition. Throughout the transfer of the property from the state to the NSF in 1960-1961, the City of Boulder and Colorado General Assembly were repeatedly assured by the NSF in no uncertain terms that this gift of land provided by the people of Colorado to the nation's scientists would be used for the sole purpose of providing a space for NCAR to conduct vital research about the atmosphere.

Dr. Walter Orr Roberts, founding Director of NCAR in 1962, stated it best when he said. "[t]his unique combination—a site of great natural beauty, close to a thriving scientific community . . . — provides a nearly perfect atmosphere for creative science. We intend, as our ultimate thanks to the people of Colorado, to do our best to produce scientific results whose excellence is commensurate with the beauty of the surroundings and the enterprise of the community in which they were produced."

The promises made by NSF to the City of Boulder were further codified through an amendment to the city's charter known as the "blue line" in 1961. Until that point, the city supply of water service was prohibited to land on the westward side of the city above a line defined in the city charter. The language of the charter amendment asked the people of the City of Boulder whether there should be an exception to the stated restrictions on the supply of water to the NCAR site. The language of the ballot question was:

"Provided, however, that notwithstanding the above stated restrictions on the supply of water service, City water service can be extended to the following described tract or tracts of land if, and only if, said tract or tracts of land are used to carry out the purposes and functions of the University Corporation for Atmospheric Research, the National Center for Atmospheric Research or the National Science Foundation."

A restructuring in the function, mission, management or operation of the NCAR site, at odds with voter intent and approval, would jeopardize, if not nullify, the city's ability to continue to provide water service to the site.

The surrounding NCAR acreage adjacent to the campus buildings has, since the establishment of NCAR, been preserved in its natural state. These lands contribute significantly to, and are part of, the city's open space system. This landscape supports a rich diversity of plants, animals and habitats and provides world-class outdoor recreation for millions of visitors every year. NCAR's undeveloped, natural acres are subject to a management agreement with the City of Boulder to help ensure these natural lands remain ecologically healthy, are managed for wildfire resiliency and that they continue to provide visitors with meaningful recreational purposes into the future. These natural lands are highly valued in their current state and provide significant ecological and recreational services that cannot be replicated or improved upon through another use.

What should the performance objectives and metrics be for a restructured atmospheric research center?

NSF's initial determination should focus on the appropriate evaluation metrics that best capture the value of a national atmospheric research center. Performance objectives and metrics should consider current state before reaching a foregone conclusion that directs action; as the objectives and metrics would otherwise be meaningless and performative. If concepts around restructuring persist, the City of Boulder would advocate for the NSF to perform a cost-benefit analysis that shows exactly how dismantling, privatizing and fragmenting NCAR provides benefits to the scientific community, the nation, and the local community. Such cost-benefit analysis should include evaluations of scientific impact that look beyond the short term and consider how NCAR research from decades ago has translated into operational capabilities, economic value for the surrounding community and nation, and lives saved.

A cost benefit analysis should also include the number of researchers, universities, and agencies NCAR's infrastructure would serve under the administration's new plans for dismantling and privatization. What is the multiplier effect of NCAR's current shared resources versus the cost of those same resources being replicated individually? What would the volume, quality, and usage of publicly available datasets be? Analysis should also measure how many atmospheric scientists have been trained through NCAR programs and now work in operational agencies, universities or the private sector.

Of special importance to the Boulder community, the city would like to understand exactly how NSF expects dismantling and privatization of NCAR research to improve forecast accuracy, lessen lead time on severe weather warnings or lead to more lives saved or damage being avoided. These metrics should be essential in any changes contemplated by NSF. It is disappointing they have not been addressed at all.

Conclusion:

The NCAR Mesa Laboratory and its surrounding lands represent a unique and irreplaceable asset for the nation and the Boulder community as a scientific institution, as protected open space integral to the character of our city, and as a major economic driver of our local economy. NCAR's value lies precisely in its public, long-term, community-serving mission, and any actions that dismantle this institution or remove these lands from the public domain would violate the spirit and letter of prior agreements with the City of Boulder and the State of Colorado. Such actions

would also call into question the city's ability to continue to provide water services to this site, as those services were specifically approved by the voters to allow for NCAR's public mission and operation as a community asset. Should that public mission be abandoned, or the property transferred to private interests, the City of Boulder could not presume that voter-sanctioned commitments extend to the new uses of the site and would be compelled to revisit the terms and obligations governing that relationship.

The actions contemplated by NSF are short-sighted and no evidence has been produced that they would improve efficiency, reduce costs, or strengthen U.S. scientific prowess. The City of Boulder is strongly opposed to the actions proposed by the NSF as such actions would only serve to damage our local community and deteriorate our scientific infrastructure, leaving the U.S. less competitive globally, weakening our national security, and squandering decades of public investment that cannot be easily rebuilt.

Sincerely,

Nuria Rivera-Vandermyde

City Manager, City of Boulder, Colorado

Aaron Brockett

Mayor, City of Boulder, Colorado