

From: [Philip Selleck](#)
To: [Mike Murray](#)
Subject: Re: advice needed
Date: 03/31/2010 03:30 PM

Mike,

I would go back to my more generic recommendation, i.e. setting a range or number of ramnps, with details on location to be noticed by your office as conditions change.

▼ [Mike Murray/CAHA/NPS](#)

**Mike
Murray/CAHA/NPS**

03/31/2010 01:54 PM

To Doug Wetmore/DENVER/NPS@NPS

cc jason.waanders@sol.doi.gov,
mike.stevens@sol.doi.gov, Paul
Stevens/CAHA/NPS@NPS, Philip
Selleck/WASO/NPS@NPS, Sandra
Hamilton/DENVER/NPS@NPS

Subject Re: advice needed 

We have GPS coordinates for the start and end points of each beach segment. Need advice on how to include that in the draft regulation> If we use coordinates only (without a text description), it will be difficult for the public to understand the locations.

Mike Murray
Superintendent
Cape Hatteras NS/ Wright Brothers NMem/ Ft. Raleigh NHS
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▼ [Doug Wetmore/DENVER/NPS](#)

**Doug
Wetmore/DENVER/NPS**

03/31/2010 01:16 PM

To Mike Murray/CAHA/NPS@NPS

cc jason.waanders@sol.doi.gov,
mike.stevens@sol.doi.gov, Paul
Stevens/CAHA/NPS@NPS, Philip
Selleck/WASO/NPS@NPS, Sandra
Hamilton/DENVER/NPS@NPS

Subject Re: advice needed 

Hi Mike.

Does park staff have GPS locations (lat/lon) for the existing features such as ramps and beaches? If so, they could be used in the language to at least provide documentation on the location of these features at the time of the rule. However, this probably wouldn't work for the "new" ramp locations, as I believe their exact locations on the ground have yet to be determined.

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▼ Mike Murray/CAHA/NPS

**Mike
Murray/CAHA/NPS**

03/31/2010 10:33 AM

To jason.waanders@sol.doi.gov, Sandra Hamilton/DENVER/NPS@NPS, Philip Selleck/WASO/NPS@NPS
cc Doug Wetmore/DENVER/NPS@NPS, mike.stevens@sol.doi.gov, Paul Stevens/CAHA/NPS@NPS
Subject advice needed

Jason, Sandy and Phil,

Park staff and I continue to struggle with coming up with clear and concise language to describe the ORV routes (i.e., the beach segments open to ORVs) in the proposed rule in a way that does not rely so heavily on using the current names of facilities (e.g., Coquina Beach) and ramp names (e.g., Ramp 4, Ramp 23, 27, etc.). Our efforts thus far have been tedious at best and have resulted in awkward descriptions (based on distance from "fixed landmarks," such as town or village boundaries, which will not change over time) that will not be easily understood by the public. See attached language, which I am not satisfied with (it needs to be simplified). In other words, we are bogged down in reviewing/editing the draft proposed rule because we haven't found an easy way to overcome the concern about the ORV route segments to current ramp names that could (and may likely) change in the future.

The issue that we are trying to avoid (but which may be leading us down the path of more complicated descriptive language) is that if we use the current ramp names in the regulation, which would be the easiest thing to do for all involved, it is highly likely that ramp name(s) and potentially the location of some ramps could change

over time. If the regulatory description uses a place name that changes, would we need to change the regulation; and would the location identified in the regulation become obscure over time? This is not a hypothetical concern, as the CAHA special regulation on commercial fishing has already experienced such an issue. In 7.58(b)(6), "ramp 22" is used as a reference point for the sport fishing zone. "Ramp 22" is long gone, no longer exists, and at best only a few long-time staff sort of remember where it was. On the other hand, even though ramp 22 no longer exists and the reference may be confusing to people reading the regulation for the first time today, most people who need to know the regulation seem to understand where the sportfishing zone is. In other words, "ramp 22" is obscure but the approximate location of where it used to be has become the accepted location of the boundary of the sportfishing zone.

For the ORV rule, rather than try to come up with "geographic descriptions" that are independent of current facility and ramp names, some of which will likely change over the next 10-15 years (which is what we've been trying to accomplish, but had limited success), it would be much simpler to describe the beach segments by the existing landmarks, as we have done in the DEIS. Would it work to use some sort of qualifying language, such as "the current (or 2010?) location of" ramp xx; so that in the future if the ramp name changes or the ramp is lost in a storm and relocated some place else, the actual location of the ORV route segment would still be based on where ramp xx was originally located when the regulation was established? Some version of such qualifying language in reference to the current ramp names would make the task of describing the ORV route segments much, much easier to finish and easier for the public to understand, as long as we do not risk losing sight of the intended ORV route segment boundaries if/when name or location of the ramp(s) change, which is inevitable. At this point, I'm just looking for an efficient way to resolve this, so we can move forward.

Any suggestions for adequate "qualifying language" that we could use to convey that the ORV route segments are designated based on the current location of the reference points used, and if those reference points (i.e., ramps) change in the future, the ORV route segment would still be located more or less where they were when the regulation was established? Is there a simple way to say that/do that, so we can move forward (and stop the tedious effort that has us bogged down at the moment)?

Your thoughts please.

[attachment "Route Descriptions.v033110.mbm.docx" deleted by Doug Wetmore/DENVER/NPS]

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