

Comments on NPS Recommended Path forward on Carrying Capacity

1. CAHA “*Ecological Carrying Capacity*” for endangered species, or species of interest are unknown, un-estimated and unpredictable and have spatial and temporal variables still yet to be determined and the parameters provided.
2. Park “*Operational Capacity*” remains loosely defined, contingent on allocation/availability of law enforcement personnel, and based on regulatory parameters not yet established. Beyond control of CAHA?
3. “*User Capacity*” dependant on unknown and undetermined variables – subjective values determined qualitative judgments; also dependant on area design capacity/budget allocations. Primarily and simply a separation of ORV and pedestrian user groups.

None of the three suggested approaches appear to individually, or collectively resolve current CAHA ORV situation. Nor does there seem to be the adequate scientific basis necessary to arrive at a “supportable long term ORV management condition” either for biological ideals or ORV user satisfaction (as represented to date) based on existing information and data. CAHA operational capacity (law enforcement and biological research/monitoring, information/education staffing and budget requirements) appears to be a moot point at this time, as these projected requirements have not yet been related to specific on-site conditions.

It does not appear that a “desired resource condition” can yet been adequately defined with respect to populations numbers, reproductive trends, spatial requirements, seasonal variations, or the merits of the inclusion or exclusion of nearby populations for CAHA considerations. Specific ecological carrying capacities will be hypothetical and arbitrary in this situation and if specific populations fluctuate, it seems unlikely that any cause and effect determinations can be made given the number of increasing variables. Excluding “off-shore dredge island” populations from the overall CAHA range is an unfortunate interpretation of species requirements and populations trends for the immediate area. CAHA may wish to consider an alternate path of “*limits of acceptable change*” to refine and respond to conditions with necessary management actions.

Establishing levels of user capacity appear difficult to determine when neither the types, nor levels of individual users are established or predicted with respect to either current use, or data based trends and refined resource impact estimates. Without increased, or decreased design capacity estimates, it does not appear that user types and levels can be “self-regulating, except in the most constrained circumstances where visitors may flee from high ORV use or ramp areas. If more pedestrian access and utilization areas were available, it would seem likely to promote greater non-ORV use overall for the Seashore. Further information would be necessary to approach a “desirable” level of use and various use types. Otherwise related decisions would be as arbitrary as existing conditions.

The CAHA “operational capacity” is not clear in current or projected law enforcement, research, monitoring, and educational FTEs, seasonal, volunteer, equipment levels, or budgets required in lieu of recommended resource/ecological conditions or user capacities. CAHA could perhaps be more effectively served with more explicit guidance with respect to management requirements. Adaptive management would have to respond to variable situations, past (traditional), present and future) and to make such responses in a predictable, equitable and consistent manner. It would appear desirable to inform the Committee of the range of realistic requirements.

Given the unknowns and uncertainties related to CAHA carrying capacities, several broad and admittedly arbitrary criteria to establish a more consistent and predictable but simplified management regime might include:

1. A fixed minimum of 60% plus/minus 10% of the Seashore be designated for ocean shore and sound side resource protection and pedestrian/non-motorized use year around. Selectively increased pedestrian access, facilities and parking would appear to be required to expand this user group category..
2. In the remainder Seashore area, ORVs be provided increased access including interduneal road/route system(s) and conditional options, parking and facilities, but remain subject to safety closures and limited numbers.
3. Seasonally (October to March) open limited ORV access to Cape Point and other prime fishing destinations for trial period, but remain subject to safety closures. Species populations would be monitored more closely.
4. Intensify predator control in shorebird areas (fox, raccoon and feral cats) with in the Seashore. Delay artificial habitat manipulation or chick barriers until further information could be used to support consideration of such actions.
5. Intensify informational and educational activities.
6. Adjust proportionally the use zones at end of a trial period to reflect changes in migratory and resident shorebird populations, geographic utilization, behavior and reproductive success.

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