

From: [Mike Murray](#)
To: [Ona Ferguson](#)
Cc: [Cyndy Holda](#); [Paul Stevens@nps.gov](mailto:Paul_Stevens@nps.gov)
Subject: Re: Self-contained vehicle camping
Date: 10/27/2008 04:03 PM

Ona,

Thank you for the update. With regard to the self-contained camping issue, though I still have serious concerns which have not been resolved by the proposal, I am open to not standing in the way of further discussion at the Committee level, assuming the subcommittee will forward a "recommendation" using the same general language articulated below. I do see at least three issues with the proposal:

1. NPS funding constraints. I currently cannot commit to keeping 3 campgrounds open in the off-season for self-contained units. No matter how self-contained the vehicles are, there are inherent operating costs (patrol, trash removal, etc.) with designating a self-contained area. The more use, the more workload and staff time needed to support the service. For example, we do not have any winterized RV dump stations that are open during the winter. Where would SCVs dump their holding tanks? While I believe Patrick P is representing the interests of his constituents, I don't know how much demand for the service there really is. Historically, the demand for off-season camping has not supported operating the campgrounds beyond the current dates. That is a fact. People should not expect NPS to provide additional services that are not at least cost neutral.
2. Fairness issue. It will be an issue if we allow "low amenity" camping to people in vehicles and exclude the same opportunity for people in tents. If we provide the same for people in tents, then it leads us back to the slippery slope of Item # 1 (if "primitive camping" is open for tents, then we need to provide restrooms and potable water, etc.).
3. NPS does not want to compete with local businesses (commercial campgrounds) for off-season customers. Everything I have heard suggests that this will be a major concern of these businesses. **I think you should expand the subcommittee to include someone representing local business (a CHBA or Chamber of Commerce rep, or both) so these issues can be discussed and preliminarily resolved at the subcommittee level.** Otherwise, I'd be surprised if the full committee will agree to the recommendation (because of the conflict with local campground operators), but am willing to let it go up for discussion. Maybe a **win-win solution** would be for the local business representatives on the Committee to work with local campground operators to ensure there are reasonably priced off-season rates for self-contained vehicles (i.e., for RV's that do not need hook-ups). In other words, find a solution acceptable to all that would satisfy the interest of having a place to park overnight during the off-season. If people have a reasonable place of park their SCV overnight that is reasonably close to the fishing areas, who really cares exactly where it is or who is operating it?

Bottom line: I am open to letting the group try to work through the remaining concerns and am open to receiving a nonbinding "recommendation" from the full Committee, but would be concerned if it were considered an absolute requirement that NPS designate three areas for SCVs (I will not be able to agree to the latter approach because of, as a minimum, Anti-Deficiency Act considerations). I say let

the group keep working on it a little longer, trusting that the full Committee will consider the issues and concerns mentioned above.

As an aside, the references to self-contained vehicles (SCVs) at other parks must consider the differences in context between those parks and CAHA before drawing any rationale conclusions. Cape Cod has no NPS campgrounds in the park (so as not to compete directly for camping business with the private sector), 80% of the Seashore's ocean beaches are closed year-round to ORV use, and SCV camping is allowed only during the summer season under a complex set of regulations and requirements. This includes strict use limits, time limits, and holding tank dumping requirements. The two self-contained areas are based on a tradition that has evolved there, so are in effect a more strictly managed version of a long-standing use (whereas here, it would be introducing a new use). At Assateague, the "bullpen" area for SCVs is allowed in the context of a very strict overall use limit on ORVs (145 vehicles permitted in a 12 mile area), and has requirements regarding wastewater holding tanks. It would not make sense to me to allow SCV camping here without having some version of the regulatory context that is in place at the other parks. Having seen the complexity of managing SCV use at Cape Cod, I'm not keen to commit to something that labor intensive here; but maybe further discussion will lead to something that would be more workable.

Mike Murray
Superintendent
Cape Hatteras NS/ Wright Brothers NMem/ Ft. Raleigh NHS
(w) 252-473-2111, ext. 148
(c) 252-216-5520
fax 252-473-2595

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▼ [Ona Ferguson <oferguson@cbuilding.org>](mailto:oferguson@cbuilding.org)

Ona Ferguson
<oferguson@cbuilding.org>

10/27/2008 01:36 PM

To "Mike_Murray@nps.gov"
<Mike_Murray@nps.gov>
cc "Paul_Stevens@nps.gov"
<Paul_Stevens@nps.gov>, Cyndy Holda
<Cyndy_Holda@nps.gov>
Subject Self-contained vehicle camping

Mike,

The vehicle characteristics & operations subcommittee is essentially ready to send out their newest working document to the Committee in advance of the November meeting. They went with your preference on language

for tire pressure and for essential vehicles.

The subcommittee asked Paul and me to check in with you once more about self-contained vehicle camping. On related topics, we have removed any reference to tent camping, and we have decided not to address sleeping or napping on the beach.

The subcommittee's current language is: "SELF-CONTAINED VEHICLE CAMPING: Self-contained vehicle camping is allowed on each island in designated areas to be determined by NPS."

The reasoning behind this item being included and with this language is:

- This is a very important topic for Patrick Paquette's constituents.
- Self-contained vehicle camping regs are included in other seashores' ORV plans, so they think the ORV plan is the right place for it.
- Understanding your concern about resources, they leave it to the Park to decide where it is best for these designated areas to be located.
- The private campgrounds that are open fall, winter and spring, are not "in the beach environment" and so not what Patrick's constituents are seeking.
- They assume that camping permit fees could cover additional costs, and state that no facilities are needed.

Please let Paul and me know your thoughts on this. The subcommittee hopes to send out their document next week.

Thanks,

Ona