

Self Contained Vehicle Camping at CAHA

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Introduction:

Throughout the Reg Neg process RFA & UMS representatives have advocated for inclusion of self contained vehicle camping as it relates to recreational fishing in the CAHA ORV plan. The self contained vehicle fishing community is not the same demographic as the RV community and has a separate historic and traditional lifestyle that is well documented. At some National Seashore Units this historic and traditional use is celebrated and included in displays at public visitor centers and interpretive signage. The ORV organizations to which these users are known to belong are praised by NPS and other beach managers as being the most active participants when it comes to volunteerism and support of even non fishing programs. Unfortunately, because of the lack of a comprehensive management plan combined with very poor law enforcement here at CAHA, in the 1970's a ban on all camping in the beach environment was put in place. As a result of that ban, the behavior of this user group was to recreate in other locations within and outside the NPS system. In the years since that ban, other forms of camping have been accommodated by the management of CAHA, however self contained vehicle camping as it relates to recreational fishing remains prohibited. This situation can not be allowed to continue. One does not have to look far to find evidence of this community wanting to return to CAHA. At Cape Lookout this community is thriving and a review of web sites and newsletter of the organizations that represent this user group will quickly show their involvement in the ongoing rule making process here at CAHA.

The Vehicle Characteristics and Operations subcommittee is very close to a completing a consensus document which includes allowance of a limited amount of self contained vehicle camping. In a response to the current version of the document, NPS raised some concerns about allowance of self contained camping in the subcommittee document. Most of the NPS concerns are logistical in nature and should be able to be addressed with additional work by the committee. The most significant concern is that local business representatives have voiced opposition to the proposed inclusion of self contained camping. In an effort to both acknowledge these concerns and because I have not been asked any questions on the RFA/UMS proposal I have developed this position paper to clearly explain the RFA/UMS position.

Reasons to allow self contained camping in CAHA are as follows:

- 1) Self contained vehicle camping in the beach environment is a recognized and compatible recreational use within a National Seashore.
- 2) Self contained vehicle camping is permitted on dozens of local and state managed beaches in addition to being included in management plans at Assateague National Seashore, Cape Lookout National Seashore, and Cape Cod National Seashore along with the USF&W managed Plum Island National Wildlife Refuge. The RFA/UMS proposal to allow self contained vehicle camping at CAHA takes into consideration the unique infrastructure of CAHA along with the significant ties the local business community has with the park. When compared to other National Seashores, the RFA/UMS proposal is easily considered moderate and reasonable.
- 2) CAHA, even with a new ORV plan, will have one of the largest ORV use areas on the east coast. CAHA also has some of the widest beaches found in all of the National Seashores.
- 3) The CAHA plan will most likely be a template for the future of ORV management within NPS and this makes the ORV plan at CAHA extremely important in relation to other National Seashores, including Cape Lookout right here in NC, where there remains a significant self contained camping tradition.
- 3) Self contained camping is a historic and traditional beach use and NPS has a responsibility to preserve this type of use. When speaking with older members of many ORV organizations I have learned that prior to the 1970's when all camping in the beach environment was banned at CAHA, self contained camping was a regular activity, especially in the peak fishing seasons of late fall and early spring, which is the focus of this proposal. Just because the NPS banned all camping at that time, this is not a good enough excuse to make CAHA an exception to this standard

activity in a National Seashore.

- 4) Self contained vehicles are by definition, one of the most environmentally friendly of all sub sets of ORV.
- 5) Self contained vehicle operators are traditionally amongst the most educated and involved user groups when it comes to conservation of natural resources.

RFA/UMS proposes the following:

- 1) Self contained vehicle camping should be allowed in the beach environment of CAHA in a manner similar to other national seashores.
- 2) Self contained vehicle camping should be limited to designated areas only and there should be a minimum of one designated area on each island.
 - a) There are a variety of options for locating self contained camping areas within CAHA.
 - b) Self contained vehicle camping areas should be located on the actual beach, as is the case in other National Seashores. These areas are known as "bullpen" areas and should not be in the most popular use areas in CAHA. "Bullpen" areas are nothing more than designated areas of wide beach marked by signage and/or symbolic fencing.
 - c) During subcommittee discussions RFA/UMS conceded that because of the unique geographic location of the NPS campgrounds in CAHA, RFA/UMS agrees that these campgrounds are "in the beach environment" and would be a viable option. This option could mean that "in season" when the NPS campgrounds are traditionally open very little would change. "Off season" when the NPS campgrounds have been traditionally closed; self contained vehicle camping could be allowed without staff or keeping open existing facilities.
- 3) This proposal does not require investment in additional infrastructure. Self contained camping as operated in other National Seashores does not "require" having additional dumpsters, air stations etc. beyond what is in place to support the overall ORV community.
- 4) Although there are self contained camping areas that offer dump stations, there are some units of NPS that do not offer dump stations, including Cape Cod National Seashore. By definition, self contained vehicles have the ability to store both grey and black water and transport that waste off site until an appropriate dump facility is available. CAHA could, if it is deemed both appropriate and financially viable, winterize existing dump facilities that are open "in season" however this is not required by this proposal. This proposal also offers an opportunity for local business to offer dump and other support services to users of the self contained vehicle camping areas.
- 4) This proposal does add a responsibility with regard to law enforcement. We suggest that this does not mean that additional ranger(s) need to be designated to self contained camping, however income from the sale of a special use permit for this activity could provide funding to directly supplement or free up other monies that could be diverted to law enforcement. In addition, all ORV use areas require enforcement whether there is self contained vehicle camping allowed or not and enforcement of what RFA/UMS envisions as three small self contained camping areas should not significantly increase cost of enforcement.
- 5) The RFA/UMS proposal would require additional administration, however considering committee work is going to result in the first ever ORV management plan, once again, whether self contained vehicle camping is allowed or not, this plan is going to initiate development of a new ORV use administration system and self contained vehicle camping could be included in this development without adding significant cost.
- 6) A length of stay regulation should be developed for self contained vehicle camping as is done in other National Seashores. We propose a regulation that limits use of a self contained camping area to 7 days (1 week). Although we prefer this regulation to be set at 14 days (2 weeks) we believe a 7 day length of stay will help address concerns of local business representatives.
- 7) The purpose of this proposal is to provide for traditional self contained vehicle camping as it relates to recreational fishing as has been done since the days of converted Bread Trucks. RFA/UMS believes strict limitation on the type of vehicle allowed to participate in this use is necessary. With this in mind we participated in the development of and agree with the length and axle language contained in the proposed vehicle characteristics and operations subcommittee document. In addition we suggest language to prohibit towed campers. We believe this

regulation will help address the concerns of local business and protect manipulation of the regulations as has been seen in other locations.

4) RFA/UMS proposes NPS charge a fee and/or require a special use permit for this activity.

RFA/UMS Statement on effect on local economy:

RFA/UMS acknowledges that local business representatives have stated concerns about allowing self contained vehicle camping in the ORV management plan. We acknowledge these concerns exist and have designed this proposal to minimize these concerns even though we do not completely agree.

RFA/UMS representatives have heard constituent's state that they have not come to CAHA because the opportunity to participate in self contained vehicle camping in the beach environment does not exist during the peak fishing season in late fall and early spring. In rare cases, we have heard that NPS campgrounds or other options have been used "in season", however in these rare cases, there is always a comment on the lack of availability and no NPS campground option during that same peak season and what is available is much more expensive due to amenities not needed and does not provide the accommodations desired. A key part of the user experience for this community is to be able to recreate via the lifestyle of self contained vehicle camping in the beach environment. A well developed campground or other type of accommodation is not what they are seeking. In addition, it is important to understand this community is separate from the general RV community and should not be lumped in with that group. Of course, as in all demographics, there is some crossover or exception to the rule; however there is clearly a separate community that has been excluded from this National Seashore while being deeply involved in most others. We believe the return of self contained vehicle camping as it relates to recreational fishing will likely inspire new visitors to the park who will contribute to the local economy in many ways. These contributions will be to businesses such as gas stations, propane fuel providers, bait and tackle shops, grocery stores, convenience stores, RV maintenance providers, restaurants etc. etc. It is also possible that an opportunity for new business or expansion of existing business to provide services for this user group could result from this proposal as in a private campground offering dumping services for a fee. In conclusion, it is the opinion of the RFA/UMS that a limited and responsible regulation to allow for self contained vehicle camping as it relates to recreational fishing will result in a net benefit for the local economy, the visitor experience and CAHA in general.