

**THE ECONOMIC EFFECTS IN NOVA SCOTIA  
OF THE RV OVERNIGHT PARKING BAN  
AND ASPECTS OF CAMPGROUND MINIMUM STANDARDS**

**by**

**Andrew Cornwall**

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Note on version updates:

*The previous version of this report, dated November 30, 2005, was the first version posted to the Internet. A revision was necessitated by an e-mail communication of March 6, 2006 from Mr. Glenn Musgrave, a Nova Scotia campground operator and former president of the Nova Scotia Campground Owners Association, pointing out two important errors in the November 30, 2005 version. First, was a statement that the communities of New Minas and Truro have by-laws banning RVers staying overnight in parking lots. As Mr. Musgrave confirmed with municipal authorities, they do not. Second, was an interpretation that the intention of a letter of Mr. Musgrave published in the "Highways Magazine" of the Good Sam Club was to recommend that campgrounds charge higher fees to RVers who stay in parking lots, etc. but who use campgrounds from time-to-time to dump waste, take on water, and recharge RV batteries. The letter details that the cost of servicing such RVers can be much higher (calculated by Mr. Musgrave to be as high as \$90 in the campground he operates), but the letter did not specifically contain a recommendation for charging higher fees. Mr. Musgrave is emphatic that charging higher fees is opposite to his own business practice and his philosophy generally for campgrounds in Nova Scotia. Mr. Musgrave's position in this regard, from his e-mail message, is footnoted in the body of the current version of the report. The author thanks Mr. Musgrave for correcting the error about New Minas and Truro having RV parking by-laws, and apologizes for misrepresenting the intention of his letter to "Highways Magazine". The November 30, 2005 version of the report has been publically available for comment for over three months, however, to date only Mr. Musgrave has offered material corrections. Other changes in the current version include recalculation of the 'sensitivity analysis' in Section 9, numerous minor grammatical and editorial revisions, and, in a few instances, the codes in the table of comments of survey respondents are edited.*

## 1. INTRODUCTION

This study examines the economic effects of Nova Scotia's province-wide ban on RV<sup>1</sup> travelers staying overnight everywhere except in licensed private and public campgrounds. The objectives of the study are to provide an understanding of the issues and to estimate the economic consequences on various sectors of the Nova Scotia economy. There is also an examination of certain potentially stifling effects of Nova Scotia's regulated

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<sup>1</sup> The term 'RV' is an acronym for 'recreation vehicle'; meaning motor home and travel trailers of sundry types (including 5th wheel) used for accommodation while traveling. 'RVers' are owners or occupants of an RV. RVing is the practice using an RV.

minimum standards for campgrounds<sup>2</sup>. Policy recommendations for the Nova Scotia Government regarding the overnight RV parking ban and campground minimum standards follow from the findings of this study.

Although zoning restrictions have been enacted in various Canadian and United States' municipalities to protect local private campground interests by prohibiting RVers from parking overnight in parking lots such as at Wal-Mart stores, Nova Scotia is the only jurisdiction in Canada and the United States that has enacted a prohibition on a province-wide or state-wide basis. Private campground owners in Nova Scotia generally see themselves as beneficiaries of the prohibition against, what is called 'indiscriminate camping', because it requires RV travelers, who might otherwise stay overnight for free in a parking lot to patronize their businesses. Alternatively, a common reaction of RVers from elsewhere to the prohibition is to conclude that Nova Scotia is 'RV unfriendly' and avoid coming to the province. The economic result of RVers avoiding the Province is lost direct revenue of tourism and related businesses (i.e. tourist attractions, restaurants, food and general merchandise retailers, fuel vendors, and even public and private campgrounds), and a dampening of economic activity in Nova Scotia generally. Not all RVers, however, react negatively to such a prohibition. In some instances the allure of being in Nova Scotia overcomes the province's RV unfriendly reputation.

This study also analyzes the economic implications of Nova Scotia's mandatory standards for private campgrounds that establish minimum requirements for campsite size, road access, toilet, washroom and other facilities. Although intended to promote the health, safety, and comfort of RVers and other campers, inordinate standards can be a barrier to entry for new campground establishments and / or stifle innovations that may better suite the needs of contemporary RVers. There is the potential for inappropriate regulation to make Nova Scotia less attractive for RVers to visit. Of particular interest in this study is the minimum standard for campsite size which was recently increased from 1,200 to 2,400 sq. ft. for new campgrounds.

The study includes a profile of the Nova Scotia campground industry and the difficulties being experienced by private campgrounds. Included is an estimate of the extent that indiscriminate camping is injuring private campground operators. The type of difficulties described in Nova Scotia are likely similar to those of private campgrounds in other jurisdictions where the entire year's revenue must be earned within the span of several months. This study suggests that a different kind of campground from those of previous decades may be more successful under these circumstances. Such a campground would be intended for RVs, be constructed at minimum investment, and offer a relatively low-cost option for RVers to stay overnight while visiting an area.

Further, this study provides background information on the nature of RVers and RVing in Canada and the United States. It is important for policy makers in Nova Scotia and elsewhere to understand RVers and RVing when formulating regulations pertaining to RVers. The following aspects relevant to Canada and the United States are highlighted in this study:

- growth trends in RVing as indicated by the number of RVs manufactured and memberships in prominent clubs for RVers
- characteristics of RVers according to age distribution, financial resources, months spent RVing per year, and distance traveled per year
- categorization of RVers by type (vacationer, long-termer, and full-timer), including estimates of their numbers and respective shares of the RV tourism market

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<sup>2</sup> There are no 'RV parks' in Nova Scotia as known in other areas of Canada and the United States. Regulations in Nova Scotia would not allow them.

- reliance of RVers on staying overnight in parking lots, etc., their reasons for and against doing so, and their opinions about the practice
- ‘parking lot etiquette’ for RVers staying overnight at parking lots
- restrictions in the United States and Canada on RVers staying the night in parking lots. etc.
- responses of RVers concerning government prohibitions to their staying overnight in parking lots, etc., and specifically the extent that a prohibition negatively effects RV tourism in an area
- economic importance of RV tourism and the impact of prohibiting RVers staying overnight in parking lots, etc.: case study of Nova Scotia
- examination of the role of government minimum standards for campgrounds, with particular reference to the campground standards in Nova Scotia for minimum site size
- business justification for a restrained-investment, barebones RV campground.

This is a potentially favorable era for the growth of RV tourism. RV ownership in Canada and the United States has been growing markedly for at least two decades, and the impending surge in retirements from work of the ‘baby boom’ generation during the next ten years should generate even greater interest in RVing. Further, RVs are continually becoming more self-contained and more independent of the services provided by traditional campgrounds. Concurrently, dramatically rising fuel prices are making RVers more cost conscious and less inclined to travel to an area with a reputation of being ‘RV unfriendly’ and where their only choice is to stay in a for-fee campground even for a few hours sleep. Further, where government regulations exist to assure campground quality, they must allow for campgrounds that conform to the modern concept of RVing rather than restrict them to an outmoded model of camping.

This report is divided into 12 sections:

1. Introduction
2. Sources Used for this Study
3. Nova Scotia’s Ban on RVers Staying Overnight Everywhere Except in Licensed Private and Public Campgrounds
4. Profile of Canadian - United States’ RVing Tourism Market and RV Participants
5. Reliance and Opinions of Rvers on Staying Overnight in Parking Lots, and Compromise Policy Solution to a Parking Ban
6. RVers’ Reaction to Government Prohibitions on Their Staying Overnight in Parking Lots
7. Economic Importance of RV Tourism in Nova Scotia
8. Profile of the Nova Scotia Campground Sector
9. Economic Impact of Nova Scotia’s Ban on RVers Staying Overnight Everywhere Except in Licensed Private and Public Campgrounds

10. Restrictive Effect of Nova Scotia Minimum Standards for Private Campground Facilities

11. Policy Recommendations for the Government of Nova Scotia

12. Compilation of Comments by Respondents to the Survey for this Study

Although Metric units of measurement are officially used in Canada, in this report miles are used as the unit of distance and feet as the unit of length and area (i.e. square feet.). Imperial units are better understood by residents of the United States. (Canada converted from Imperial to Metric in the early 1970's and many adult Canadians are versed in both.) Spelling in this report is 'American'<sup>3</sup>. Money amounts are in Canadian dollars except as noted.

The term 'parking lot' in this report can include a variety of parking locations, such as parking spaces at retail stores, malls, restaurants, truck stops, churches, clubs, museums, hospitals, and so forth. As will be explained, Nova Scotia's ban on RVers staying overnight everywhere except licensed private and public campgrounds is comprehensive.

Author's Interest and Qualifications to Carry Out this Study

This study is being done at the author's initiative and on a volunteer basis. The author is not being paid for the work. The motivation for this study is a dedication to promote the prosperity of Nova Scotia and a desire to preserve the 'RV lifestyle'. The author has resided in Nova Scotia for more than two decades, and is an experienced RVer with a background spanning four decades traveling with an RV in Europe and throughout Canada and the United States.

The author offered to the Nova Scotia Department of Tourism, Culture and Heritage to undertake a 'publishable'<sup>4</sup> economic impact study on the issues at hand in return for the Department's cooperation in providing applicable information and background / statistical data. The goal of the study is to inform policy makers in the Government of Nova Scotia about the possible adverse economic consequences of policies:

- i. prohibiting traveling RVers from parking overnight everywhere except in licensed private and public campgrounds and
- ii. setting minimum standards for campgrounds that restrict innovation and discourage new campground investment.

It is hoped that the Government of Nova Scotia will react to the information and analyses in this study and alter its policies in these regards, thus increasing RV tourism in the Province and attaining the economic benefits therein.

Although now retired from customary employment, the author has substantial experience working as an economist for the Provincial Governments of Ontario and Nova Scotia , studying issues and policies involving

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<sup>3</sup> The British punctuation convention of not following 'i.e.' and 'e.g.' with a comma is adopted, however.

<sup>4</sup> The qualification that the study be publishable means that it be thorough, objective, and professionally done. As part of the 'bargain' the author retains the right to publish the results of the study if there is an opportunity to do so.



economic development, labor market conditions, and employment standards. He holds a Masters Degree in Economics and has completed extensive further graduate studies in economics<sup>5</sup>.

## 2. SOURCES USED FOR THIS STUDY

This study incorporates information from a number of sources. It appears, however, that this is the first inquiry into these specific issues. A search of academic literature did not find any studies referring to the impact on RVer travel (in Nova Scotia or elsewhere) resulting from restrictions on where RVers may stay overnight. Nor were there any studies on the impact of regulated minimum campground standards. Two works, nevertheless, were useful in providing background material for the current analysis. First is the book Over the Next Hill, an Ethnography of RVing Seniors in North America, by anthropologists Dorothy and David Counts<sup>6</sup>, that describes the 'RV lifestyle' and the motivations and circumstances of those who follow it<sup>7</sup>. Second is a study in 2001 commissioned by the Tourism Industry Association of Nova Scotia (TIANS), "Improving the Nova Scotia Campground Industry" by Dr. Doug Crapo of EXCEleration corp<sup>8</sup>, which examines the situation, issues, and economic impact of the campground industry in Nova Scotia.

Many other sources were utilized in conducting the present investigation. These include officials of the Nova Scotia Department of Tourism, Culture and Heritage who provided interpretation on and background to the Tourist Accommodations Act [1994-95, c 9,s 1] and accompanying regulations in relation to the licensing of campgrounds, restrictions on where RVers may park overnight, and minimum standards for campgrounds. Further they provided statistical data relating RV tourism and campground activity in the Province. Two leading North American RVer organizations, Family Motorhome Coach Association, with 130,000 members, and the Escapees RV Club, 34,000 members, made available information on the profiles of their members including the importance to them of staying overnight in parking lots. These organizations also supplied recommended guidelines regarding 'parking lot etiquette' for their members to follow when staying overnight in parking lots.

A number of sources were accessed through public websites on the Internet. Most prominent was a series of RVer surveys conducted for RV Travel (www.RVTravel.com), that reveal an array of characteristics of RVers, including reliance on 'overnighting' in parking lots, finances, and level of commitment to RVing (determined by time spent in an RV and miles traveled). The RV Travel website claims to have a subscriber base of over 100,000 RVers who receive its weekly on-line newsletters. The Internet was also used to search for and retrieve reports and news articles relating to RV industry trends, characteristics of RVs and RVers, and the issue of RV parking restrictions and their enforcement in Nova Scotia and elsewhere.

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<sup>5</sup> In the final years of his working career the author was Director on Information Technology Services (i.e. computing) for the Nova Scotia Department of Education and Culture.

<sup>6</sup> Dorothy Ayers Counts and David R. Counts, Over the Next Hill, An Ethnography of RVing Seniors in North America, Second Edition (Toronto, Broadview Press, 2001).

<sup>7</sup> Dorothy and David Counts were contacted in the summer of 2005 about their knowledge of other pertinent RVer literature, but they did not know of any. This is not a topic of extensive academic inquiry. They did, however, offer advice for the Nova Scotia Department of Tourism, Culture and Heritage, which is included in this study.

<sup>8</sup> Dr. David Crapo, "Improving the Nova Scotia Campground Industry" (prepared for the Tourism Association of Nova Scotia by EXCEleration corp, Calgary, Alberta. 2001).

Internet discussion (or news) groups provided an appreciation of the range of opinions of RVers on the topic of staying overnight in parking lots - most often referred to as 'Wal-Mart parking lots'. Of all possible RVing topics, this is the most frequently commented on among RV discussion groups. In some groups discourse on the topic is suppressed to avoid innumerable messages and flamboyant exchanges. A 'Google' search on the key words 'RV', 'parking', and 'Wal-Mart' results in 264,000 citations; adding the phrase 'nova scotia' reduces the number to 54,100<sup>9</sup>.

### *Survey on the Effect on RV Tourism of the Overnight Parking Ban in Nova Scotia*

Primary information for this study was gathered by an Internet on-line survey of RVers to collect information on their use of staying overnight in parking lots, their attitudes toward this activity, and on the extent that a prohibition on overnight parking except in private and public campgrounds would deter them from traveling to a location and to Nova Scotia in particular. This survey was conducted between June 30 and August 21, 2005, and was advertised through the following Internet newsgroups and forum: alt.rv, rec.outdoors.rv-travel, rv.net, and Escapees discussion forum. To obtain the broadest and least biased survey responses, RVers in the United States and Canada (and elsewhere) were asked to take the survey even if they have no intention of ever coming to Nova Scotia, and whether they approve or disapprove (or have no opinion) of RVers staying overnight in parking lots. Design of the survey form was neutral, allowing RVers to express both positive and negative positions. The survey was anonymous, no information was collected that would identify the respondents<sup>10</sup>. There were 331 useable responses to the survey<sup>11</sup>. The author appreciates the efforts and interests of the RVers who responded to the survey. Thank you! A copy of the survey form is appended to this report.

The diverse character of the groups and forum on which the survey was advertised, the open invitation for all RVers to respond, and the wide ranging nature of the responses suggest that the results of the survey encompasses the RVing community in the United States and Canada.

In addition to answers to specific survey questions, 179 respondents offered their comments about the subjects covered by the survey. The comments are organized in the final section of this report. Reading these comments is valuable for obtaining a 'first hand' understanding of the various reactions (sometimes intense) of RVers to overnight parking restrictions as now exist in Nova Scotia. There is also repeated comment on the desirability of low cost private campgrounds / RV parks, with the barest of facilities, where RVers could stay instead of using parking lots. Nova Scotia's campground standards would not permit such an accommodation.

### **3. NOVA SCOTIA'S BAN ON RVERS STAYING OVERNIGHT EVERYWHERE EXCEPT IN LICENSED PRIVATE AND PUBLIC CAMPGROUNDS**

In Nova Scotia it is illegal for a private property owner who does not have a campground license issued by the Provincial Government to provide an RVing member of the traveling public a place to stay overnight. The

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<sup>9</sup> Google search conducted September 20, 2005 at approximately 8:30 pm, ADT.

<sup>10</sup> The on-line survey was administered through the author's website: [www.geocities.com/cornwaab](http://www.geocities.com/cornwaab). Submitted surveys were processed by the free mailform facility developed and maintained by PJB Software as a Thalasson Web Resource ([www.thalason.com](http://www.thalason.com)).

<sup>11</sup> Three responses were not useable. One was an exact duplicate and two lacked sufficient information.

policy and intent of the government of Nova Scotia is succinctly stated in correspondence, in the fall of 2004, from Rodney MacDonald, Minister of Tourism, Heritage and Culture.<sup>12</sup>

"Our government and the campground industry consider camping in locations such as Walmart [sic] parking lots illegal. The Tourist Accommodations Act and Regulations requires all land owners who plan to offer this type of "camping" to have a license to do so."<sup>13</sup>

"... we must acknowledge the need for our visitors to be located in a clean and safe environment. Our licensed campground operators, as small business owners, have invested time and resources into providing a clean, safe and enjoyable experience for those who travel in our province ..."

Despite the Minister's implications, according to an official of the Department of Tourism, Culture and Heritage there is no evidence that 'camping' in other than a licensed campground is either unclean or dangerous to RVers visiting Nova Scotia. The issue is entirely the threat of loss of revenue to private campground owners as the result of the competition of 'indiscriminate camping'. This was made clear at the introduction of the ban on RVers staying overnight in parking lots. In the words of the Hon. Ross Bragg, Minister responsible for Economic Development and Tourism, on October 28, 1994, addressing the Legislative Assembly of Nova Scotia for the second reading of the then revised Tourist Accommodation Act.<sup>14</sup>

"The other thing, of course, is that we have brought in a section to the bill that there is now what we call reverse onus, regarding indiscriminate camping. This has been a very controversial issue in the Province of Nova Scotia; campground operators invest a lot of money and time in running good campgrounds and then they find that what happens is people are stopping their motor homes and travel trailers in roadways and parking lots and so on and are allowed to park, obviously without paying a fee and without having the services.

"In an effort to enhance the campground industry in Nova Scotia, not just for the operators but for the industry as such because we regulate and make sure they are done and operated in a proper manner, we have brought in that it is now illegal to allow people to indiscriminately camp on your property."

The ban on RVers staying overnight everywhere except in licensed private and public campgrounds has been in effect for more than a decade. Its current form is contained in the following sections of the current Tourist Accommodations Act, enacted in 1994-95, and accompanying regulations.

#### The Act:

2 (e). "recreational vehicle" means a vehicular-type unit primarily designed as temporary living quarters for recreational, camping or travel use, that either has its own motive power or is mounted on or drawn by another vehicle.

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<sup>12</sup> Hon. Rodney J. MacDonald, Nova Scotia Provincial Government Minister of Tourism, Culture, and Heritage, letter to author dated November 17, 2004.

<sup>13</sup> Camping is also permitted, in season, in campgrounds operated by the Provincial and Federal governments, which are not licensed. Campers are charged a fee to stay in these campgrounds.

<sup>14</sup> Legislative Assembly of Nova Scotia, Hansard, October 28, 1994.

3. No person shall use, maintain, operate or manage a camping establishment or permit the use of any lands for the overnight parking of recreational vehicles for the traveling or vacationing public unless there is a license which is in force. 1994-95, c 9 s.

15. Every person who, within the Province, uses, maintains, operates or manages a camping establishment or permits the use of any lands for overnight parking of recreational vehicles for the traveling or vacationing public without a license that is in force, is guilty of an offence and liable on summary conviction of a fine not more than five hundred dollars.

The cost of an annual campground license ranges from approximately \$80 to \$160 depending on the number of (non-seasonal) sites.

The Act and Regulations impose obligations on a campground license holder that preclude a land owner, such as a parking lot operator, from perfunctorily obtaining a license in order to meet the letter of the law. These obligations include registering guests, completing monthly occupancy reports, identifying each campsite (e.g. with a number), having an emergency evacuation plan, providing a safe water supply, assigning at least one employee to be available (in person or by phone) at all times for a contact, making available a public telephone, and daily cleaning of campsites. Further, a campground must meet minimum standards for campsite site size, campsite table, toilet and washroom facilities, and access to water supply.<sup>15</sup>

There is provision under the regulations for a “special event camping area license”, valid for 5 days, which may be issued to a person or association for a festival or other occasion that RVers or other campers may be attending. The license is issued for a fee of approximately \$160, and carries minimum requirements for toilet and washing facilities, road access, and garbage collection. As an administrative practice a special event license is not issued if local private campgrounds have the capacity to accommodate the RVers in attendance. In the range of 15 to 20 special event licenses are issues each year.

In general, therefore, it is illegal for RVers, who are members of the traveling or vacationing public, to stay overnight in the parking lots of: retail stores and shopping malls, hotels / motels, restaurants, theaters, casinos, truck stops, gas stations, RV repair garages, other businesses, apartment buildings, schools and universities, museums, medical facilities, churches, charitable organizations (e.g Red Cross), civic groups (e.g. Lions Club), veterans groups (e.g. Canadian Legion), fraternal orders (e.g. Elks), and so forth. Additionally there are no exceptions to the law, even in instances where all the campgrounds in an area are full or are closed for the season, driving is dangerous, the road is impassible, or there is an emergency or vehicle breakdown. Indeed, the law prohibits an RVer from staying overnight in a hospital parking lot while a family member is undergoing critical treatment. For RVers the restrictions might be perceived as inconvenient, and possibly dangerous and cruel.

Since the Act applies only to the “traveling or vacationing public” it not interpreted as precluding RVers from staying overnight on the property of relatives and friends. Nor is it applicable where RVs are used for the accommodation of workers, for example on construction sites and farms. Likewise, the Act does not pertain to campground facilities for seasonal campers, that is campers who intend to stay longer than thirty days. The portion of a private campground’s facilities set aside for seasonal campers, therefore, do not have to meet any minimum standards in the Act, regardless of the fact that the types of RVs inhabited by seasonal and short-term campers are often the same. As will be noted, most private campgrounds in Nova Scotia have both seasonal and short-term campers, and seasonal camping, on average, comprises the majority of a campground’s occupancy.

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<sup>15</sup> Some standards are relaxed for “wilderness camping areas” which are not accessible by regular vehicle and are designed for tent and cabin camping only.

The Act does not apply to Provincial and Federal campgrounds, nor to lands owned by Indian bands. The Act does apply, however, to municipal and community campgrounds, of which there are several in the Province.

The Act and regulations are enforced by the Nova Scotia Department of Tourism, Culture and Heritage accommodation Quality Assurance inspectors. There are four inspectors operating throughout the Province; one inspector has the specific responsibility for campgrounds as does the Manager of Quality Assurance. Although Department and officials receive numerous complaints by campground operators about indiscriminate camping generally, it appears that few specific complaints are lodged and investigated. Although the prohibition on indiscriminate camping has been in effect for many years, to date there have been no fines levied nor prosecutions. The Department sends letters annually to parking lot operators and municipal officials advising them of the ban and asking the parking lot owners to post “no overnight parking” signs. Even in the absence of aggressive enforcement, however, parking lot operators and other private land owners are wary that if they allow an RVer to stay overnight they are breaking the law.

RVers are advised of Nova Scotia’s law banning indiscriminate camping through promotional literature of the Department of Tourism, Culture and Heritage. For example, the “Doers’ and Dreamers’ Guide”, the Province’s major annual guide to tourist attractions, restaurants, and accommodations - including campgrounds, contains the following warning to RVers <sup>16</sup>:

“... For your safety, comfort and enjoyment we encourage you to use our fine assortment of campgrounds. We ask you not to camp or park your camping vehicle overnight in any area that is not designated as a campground (e.g. parking lots, shopping malls and beach areas). It is illegal to camp indiscriminately.”

### Indiscriminate Camping as an Issue

At the outset of regulation of private campgrounds in Nova Scotia in 1970, when the Camping Establishments Regulation Act was proclaimed, the greatest threat of unfair competition was from land owners who allowed camping to take place - for free or a nominal fee, but whose facilities did not meet the minimum requirements for campgrounds. There was no specific provision in this Act addressing indiscriminate camping in parking lots, etc. In recent years two powerful factors effecting RVing throughout Canada and the United States caused private campground owners in Nova Scotia (and elsewhere) to focus on the perceived danger of RVers staying overnight in parking lots. The first factor was the growing sophistication and capabilities of RVs. Being equipped with large fresh water and waste holding tanks, full bathroom with shower, AC generator (and / or solar electric panels), satellite TV, etc., RVs are now largely independent of campground services for long periods of time. Indeed, except for emptying waste tanks and filling the water tank, which in Nova Scotia can be done at public campgrounds (for a nominal fee), there is no service-based need for many of today’s RVers to stay in campgrounds.

The second factor was the proliferation of the Wal-Mart chain of retail stores in the United States and Canada. Unless made unlawful by local ordinance, Wal-Mart allows RVers to park overnight for free in its store parking lots. Specifically Wal-Mart’s policy is:

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<sup>16</sup> Nova Scotia Department of Tourism, Culture and Heritage, 2005 Doers’ and Dreamers’ Guide  
. 34.

“Wal-Mart permits recreational-vehicle (RV) parking on our store lots, as we are able. The ability to accommodate RVs is determined on a store-by-store basis, contingent upon available space, local regulations and ordinances.”<sup>17</sup>

From a business perspective RVers have proven to be profitable Wal-Mart customers. By one account each RV-night spent at a Wal-Mart store on average increases store revenue by \$29 (U.S.). The marginal cost to Wal-Mart of providing a parking space is most often zero. The example of Wal-Mart is being followed by a few other retailers in various areas of Canada and the United States.

Wal-Mart was founded in Arkansas in 1962 by Sam Walton, who is reported to have been an RV enthusiast. As of 2005, in Canada there are 235 Wal-Mart stores and 6 affiliated Sams’s Clubs stores<sup>18</sup> ; in the United States there are 3,151 Wal-Mart stores and 551 Sam’s Club stores<sup>19</sup>.

Wal-Mart came to Canada in 1994 with its purchase of the Woolco national chain of retail stores; converting 122 into Wal-Mart stores. The conversions resulted in two stores in Nova Scotia: Dartmouth and Lower Sackville. This number has grown steadily, and as of 2005 there are fifteen Wal-Marts in the Province, at Amherst, Antigonish, Bridgewater, Dartmouth, Digby, Halifax (2 stores), Lower Sackville, New Glasgow, New Minas, Port Hawkesbury, Sydney, Sydney River, Truro, and Yarmouth<sup>20</sup>. Despite Nova Scotia’s ban on RVers staying overnight in parking lots, etc., RVs are in evidence staying the night at some Wal-Mart stores in the Province. As described in section 8 of this report, the number of RVers parking overnight at Wal-Marts in Nova Scotia is presently not significant compared to the overall volume of RV tourism. The perceived threat to campground revenues would be compounded, however, if overnight RV parking becomes common at approximately 121 retail parking lots in the Province, and at innumerable gasoline stations, restaurants, tourist attractions, etc.

#### *Recent History of Public Complaints by Nova Scotia Private Campground Operators About the Problem of Indiscriminate Camping*

The issue of indiscriminate camping apparently was not a major concern of campground owners several years ago. A survey of campground owners in Nova Scotia conducted in early 2001 by Dr. Doug Crapo as part of his study “Improving the Nova Scotia Campground Industry” asked for issues that were of most concern to them. The resulting list of issues was comprehensive, for example: government regulations, lack of staff after Labor Day, cost of fuels and infrastructure, being competitive, marketing, road conditions. But indiscriminate camping was not among them. The study report stated<sup>21</sup>:

“It is interesting to note that private/municipal campground owners did not mention indiscriminate camping or temporary campground permits for special events and caravans as being important issues ...”

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<sup>17</sup> Wal-Mart Internet website: [www.walmartfacts.com/newsdesk/company-statements.aspx](http://www.walmartfacts.com/newsdesk/company-statements.aspx). August 8, 2005.

<sup>18</sup> Wal-Mart Canada Internet Website: [www.walmartcanada.ca](http://www.walmartcanada.ca). August 12, 2005.

<sup>19</sup> Wal-Mart, “2005 Annual Report”. 17,19.

<sup>20</sup> Wal-Mart Canada Internet Website.

<sup>21</sup> Crapo 21

A search of Newspaper articles indicates very little, if any, public comment about the issue of indiscriminate camping in Nova Scotia prior mid-2003; thereafter there were occasional articles in Nova Scotia newspapers and pieces on local CBC radio and television expressing the various viewpoints of individual campground owners, the Campground Owners Association of Nova Scotia (COANS), the Tourist Industry Association of Nova Scotia (TIANS), and the Canadian Federation of Independent Business (CFIB). The concern is that indiscriminate camping by RVers is siphoning off business that belongs to private campground owners. The arguments generally comprise two themes: first, Nova Scotia campgrounds, by right of their investment, adherence to Provincial campground licensing regulations, and position in the economy as small businesses deserve to be protected from the competition of free camping in parking lots (The CFIB has also been promoting the cause of protecting private campground owners in other provinces from indiscriminate RVer camping, through newspaper articles expressing similar arguments.) The second theme is simply that in Nova Scotia indiscriminate camping by RVers is illegal and this law should be rigorously enforced.

A third rationale was expressed by Mr. Glenn Musgrave, past President of COANS, in a letter to the November 2003 Good Sam Club "Highways Magazine", distributed to nearly one million Good Sam Club<sup>22</sup> members throughout North America. Mr. Musgrave referred to the sharply higher costs to campgrounds of servicing "boondocking" RVers, who habitually stay overnight for free in parking lots and patronize private campgrounds in order to dump waste tanks, fill fresh water tanks, and charge RV batteries. Mr. Musgrave's tally of the costs of servicing such an RVer at the campground he operates amounted to \$90.<sup>23</sup>

None of the newspaper, broadcast, periodical, and Internet material reviewed for this study expressed substantive, if any, concern for RVer health and safety nor danger to the environment from dumping waste as a result of indiscriminate RVer camping. If there were actual perils in these regards they would have been cited.

An oblique reference to the risk to RVers from staying overnight in parking lots in Nova Scotia was contained in a joint submission of COANS and TIANS to the Minister of Tourism, Culture and Heritage on May 2, 2005. An alleged risk to RVers is somehow thought to result in increased insurance costs for private campground operators. The submission further quantifies the lost revenue of private campgrounds due to indiscriminate camping<sup>24</sup>:

"Improving the NS Camping Industry" task force stated in 2002 that; \$20 to \$25 million of revenues have been lost to Indiscriminate Camping". [Note, this assertion is analyzed in section 8 of this report, and the amounts claimed are not supported by the data.]

"This is not just a financial issue; it is also a liability issue. TIANS is working diligently

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<sup>22</sup> The RVers 'club' owned by Affinity Group Holding, Inc. Not to be confused with the Wal-Mart owned Sam's Club.

<sup>23</sup> The November 30, 2005 version of this report incorrectly suggested that the intention of Mr. Musgrave's letter was to "recommend that private campgrounds in Nova Scotia charge such RVers a higher fee of up to \$90 per night". In an e-mail message to the author, dated March 6, 2005, Mr. Musgrave responded: "I strongly oppose this practice and have been very vocal on the negative impact this would have on our industry should such a practice become wide spread. The article I wrote for Highways Magazine tried to educate RVers of the cost this practice had to the campground operator when an RV came in with full holding tanks etc. The answer to this problem is not found in charging campers or even some campers \$90.00 per night."

<sup>24</sup> Campground Owner's Association of Nova Scotia and Tourist Industry Association of Nova Scotia submission to the Nova Scotia Minister of Tourism, Culture and Heritage, May 2, 2005. 2.

with the insurance industry to address current advocacy issues relating to insurance affordability and availability. If tourists are at risk, and they are, when they camp indiscriminately, then the overall industry could suffer increased risk assessments as litigation costs increase.

“COANS and TIANS are committed to assisting the Minister with the actualization of these items in any manner deemed appropriate to ensuring indiscriminate camping is an issue of the past and our Vision partnership is the focus of the future.”

This submission proposed four measures to improve enforcement of and compliance with Nova Scotia’s law prohibiting RVer indiscriminate camping:<sup>25</sup>

“1. Formal legal clarification and assignment of the law re enforcement of the Tourist Accommodations Act.” [i.e. authorize the RCMP and other municipal police forces to enforce the prohibition on indiscriminate camping]

“2. Impactful signage at critical entry points in major transportation routes.” [i.e. put signs at entry points into Nova Scotia and on major roads advising RVers that it is illegal to stay overnight everywhere but in licensed private and public campgrounds]

“3. Training, signage and promotion in all VIC’s.” [i.e. train Nova Scotia tourism Visitor Information Center staff to advise RVers about the prohibition, and post signs at the centers.]

“4. Championing the campground industry and promotion of legitimate campsites.” [i.e. promote the advantages of private campgrounds in Nova Scotia tourism marketing.]

### Government RVer Parking Prohibitions in Other Jurisdictions

Nova Scotia is the only jurisdiction in Canada and the United States that has a province-wide or state-wide ban on RVers staying overnight everywhere except in licensed private and public campgrounds<sup>26</sup>. There have been a few attempts to adopt prohibitions at the state level in the United States, Nevada being the most recent instance, but in each case the legislation was abandoned because of objections by numerous RVers.

A number of communities in Canada and the United States have enacted measures prohibiting RVers from staying overnight in parking lots. Private campground owners most often provide the impetus for such restrictions in response to RVers overnighing at local Wal-Mart stores. There are unofficial listings of Wal-Mart

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<sup>25</sup> Campground Owner’s Association of Nova Scotia and Tourist Industry Association of Nova Scotia. 2,3.

<sup>26</sup> There was a question about Newfoundland and Labrador having a similar provision, because campgrounds in that Province are subject to mandatory licensing under the Tourism Establishments Act, but the accompanying regulations do not specifically prohibit staying overnight in parking lots, along roadsides, etc. An official with the Newfoundland and Labrador Department of Tourism, Culture and Recreation confirmed through e-mail correspondence with the author that “nothing was being done about it [RVers staying overnight in parking lots, etc.] in the absence of specific regulations about it”. RVers who have recently been to Newfoundland and Labrador report that staying overnight in parking lots is common. Since Nova Scotia is on the path to Newfoundland and Labrador, removing of the Nova Scotia’s ban on RVers staying overnight in parking lots would likely increase RV tourism in there.



stores or respective communities where overnight parking has been banned by local zoning provisions. A frequently referred to website, 'RV Unfriendly', collects reports from RVers of locations where RVer overnight parking is not allowed. As of August 2005 the website listed 47 communities in fifteen states<sup>27</sup>. Another reference is the printed directory called "Wal-Mart [and Sam's Club] stores that do not allow overnight RV parking", distributed through the website of freecampgrounds.com, which lists 340 Wal-Mart stores in the United States having such restriction as of April 2004<sup>28</sup>. This number represented about 10% of the Wal-Mart and Sam's Club stores in the United States. There is very little information about communities in Canada that have zoning regulations keeping RVers from staying overnight at Wal-Marts or other parking lots. A search of information on the Internet mentions only a handful of Canadian locations with such prohibitions.

In many jurisdictions where RVers are not allowed to stay overnight at Wal-Mart and other parking lots there are options for free overnight parking nearby, for example at truck stops and / or interstate highway rest areas.

There is an irony in Nova Scotia's ban on RVers staying overnight in parking lots. The fairly widespread availability of such parking elsewhere has markedly increased the popularity of RV tourism in Canada and the United States, and for outpost destinations such as Nova Scotia it has made long-distance travel to the area more economically feasible. Although benefitting from RVers being able to stay overnight in parking lots in other jurisdictions while on route to the Province, Nova Scotia campground owners do not wish it to occur here.

#### **4. PROFILE OF CANADIAN - UNITED STATES' RVING TOURISM MARKET AND RV PARTICIPANTS**

Nova Scotia is part of the Canada - United States RV tourism market with RVers traveling to the Province from all regions of Canada and the United States. It is important for policy makers to understand the trends in the RV tourism market and the characteristics of the individuals who are affected by their laws and regulations. Without such an understanding, policies can be unreasonable and / or counterproductive. Likewise, suppliers to the RV tourism market (e.g. campgrounds, fuel vendors, restaurants, attractions, etc.) need to know the characteristics of the RVers they hope to serve. This section has two objectives. First is to examine the size and recent growth trend of RVing in Canada and the United States. (The growth in RVing overall is in contrast to the substantial concurrent decline in the number of RVers visiting Nova Scotia, as documented in section 7.) The second objective is to portray the diverse nature of RVers in terms of the kind of RVs they use, the community support structures represented in their RVers' clubs, their financial status, and their commitment to RVing as determined by the time they spend in RVs and distances traveled. RVers are not a homogeneous group, but may be considered to be composed of three types: vacationers, long-termers, and full-timers, each with its own characteristics and requirements. Although vacationers are more numerous, the long-termers and full-timers constitute by far the biggest components of the RV tourism market.

##### Extent and Growth Trend of RVing in Canada and the United States

There are two measures of the scale of RVing in Canada and the United States. One measure is the number of persons, or 'enthusiasts', who are involved. According to this metric there are about 30 million

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<sup>27</sup> RV Unfriendly Internet website: [www.avoicfone.com](http://www.avoicfone.com). August 13, 2005.

<sup>28</sup> Internet website: [www.freecampgrounds.com](http://www.freecampgrounds.com). August 13, 2005.

RVers in the United States <sup>29</sup> and 3 million in Canada <sup>30</sup>. The other measure is the number of RVs ‘on the road’. Data on campground capacity, measures of expenditures by RVers, number of RVing club memberships (referred to as ‘member families’), etc. usually relate to the RV unit. The RV unit is the norm used in this study.

Based on the most recent publically available estimates, in 2001 there were 7.2 million RVs ‘on the nation’s roads’ in the United States <sup>31</sup>, and comparably in 2003 “approximately 1.5 million households in Canada own a motorized or towable RV” <sup>32</sup>. Given the growth of sales of RVs, the combined Canada and United States RVing market in 2004 would be in the range of nine million units.

### Types of RVs and Unit Growth Trends

RV manufacturers shipment data for the United States in the years 2000 through 2004, shown in Table 1, reflect the general growth in new RV ownership and the relative popularity of RVs by type.

TABLE 1					
United States RV Shipments in 2004					
Type*	Annual Number of Units / Percent of Shipments				
	2000	2001	2002	2003	2004
<i>Towables</i>					
Travel Trailers	114,500 38.2%	102,200 39.9%	129,700 41.7%	139,800 43.6%	163,600 44.2%
Travel Trailers - 5 <sup>th</sup> Wheel	62,300 20.8%	54,700 21.3%	66,100 21.3%	74,600 23.3%	91,000 24.6%
Folding Camping Trailers (tent & hardside folding trailers)	51,300 17.1%	40,800 15.9%	44,800 14.4%	35,700 11.1%	34,100 9.2%
Truck Campers	11,100 3.7%	9,900 3.9%	10,000 3.2%	8,800 2.7%	9,600 2.6%

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<sup>29</sup> RVIA Internet website: [www.riva.org](http://www.riva.org). Quick RV Facts. August 3,2005

<sup>30</sup> Go RVing Canada Internet website: [www.gorving.ca](http://www.gorving.ca). Press release circa 2003. August 14, 2005.

<sup>31</sup> RVIA Internet website. ‘RV Quick Facts’. August 3, 2005.

<sup>32</sup> Go RVing Canada Internet website. ‘Hassle-Free Solution to Buying a Used RV’. August 14, 2005.

TABLE 1					
United States RV Shipments in 2004					
Type*	Annual Number of Units / Percent of Shipments				
	2000	2001	2002	2003	2004
<i>Motorized</i>					
Motorhomes - Type A (coach)	41,000 13.7%	33,400 13.0%	39,600 12.7%	41,500 12.9%	46,300 12.5%
Van Campers - Type B	3,400 1.1%	2,600 1.0%	2,800 0.9%	2,100 0.7%	2,500 0.7%
Mini - Type C (truck body)	16,500 5.5%	13,200 5.1%	18,000 5.7%	18,300 5.7%	23,000 6.2%
<i>Totals</i>	300,100 100.0%	256,800 100.0%	311,000 100.0%	320,800 100.0%	370,100 100.0%
* Does not include park models (i.e. trailers meant for stationary installations)					
Source: RV News Internet website: www.rv-news.com. December Issues.					

Except for a substantial dip in 2001, the trend in total United States' RV shipments has been increasing, growing by 23.3% between 2000 and 2004. During the same period the sub-market for folding camping trailers, however, declined significantly, with shipments decreasing by 33.5%. Excluding folding camping trailers, the four-year growth in RV shipments was 35.0%. Information on shipments by Canadian manufacturers is not readily available for this study, but United States' manufacturers comprise the bulk of the combined Canadian and United States' RV production capacity.

A 2003 survey on the pattern of RV ownership in Canada indicates that 60% of RV owners have travel trailers or 5<sup>th</sup> wheels trailer, 18% have folding camping trailers, and 18% have motorized RVs<sup>33</sup>.

#### *Unique Position of Folding Camping Trailers*

Folding camping trailers have a unique position within the RVing spectrum. They are not well suited for long-term camping and do not have sufficient waste and water tank volumes to be independent of campground facilities. As a rule, traveling RVers with folding camping trailers stay overnight in campgrounds. Because of the different way they use their RVs, many owners of folding camping trailers do not consider themselves to be part of the rest of the RVing community<sup>34</sup>. Thus, the data in the remainder of this report may not significantly reflect

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<sup>33</sup> Go Rving Canada Internet Website: www.gorving.ca. 'RVers. Who Are they?'. August 14, 2005.

<sup>34</sup> Of the (1,669) respondents to an RV Travel Internet survey posing the question "What type of RV do you own" only 1.86% selected "Pop up trailer" (i.e. folding camper trailer). Source: RV Travel Internet website survey July 30, 2005: www.rvtravel.com (August 25, 2005).

RVerS with folding camping trailers. Except for a possible philosophical objection to Nova Scotia's ban on staying overnight in parking lots, this restriction would have minimal effect on the decision of RVerS with folding camping trailers to travel into the Province.

### Trends in RV Club Membership

The overall trend in popularity of RVing is further evidenced by memberships in RVing clubs, of which the three described below (listed alphabetically) are most prominent among RVerS in Canada and the United States. Although there are many RVerS who do not belong to these clubs, the trend in membership is indicative of the general interest in RVing in Canada and the United States.

The descriptions of the club benefits and activities below provide a sense of the relative levels of support that these clubs provide to their members. The benefits are listed as examples, and are not intended to be a comprehensive list. The Good Sam Club is primarily a marketing and publishing organization, and appeals to a cross section of RVerS. The Escapees RV Club and the Family Motor Coach Association (FMCA) serve the needs of the more committed RVerS. (The Escapees RV Club and FMCA contributed information about the characteristics of their members for use in other parts of this study.)

#### *Escapees RV Club*

The Escapees RV Club is a for-profit organization with membership open to RVerS and RV enthusiasts generally. Annual basic dues is \$60 (U.S.) per family unit (including single individuals). Club headquarters is in Livingston, Texas. The Escapees RV Club provides a comprehensive array of services for full-time and long-term RVerS. These include: mail forwarding, voice messaging, pharmacy, e-mail server, roadside assistance, vehicle and health insurances, etc. There are educational and social programs, including regional and major gatherings - called Escapades, as well as RVer advocacy activities (e.g. tracking and taking positions on government legislative issues). A magazine, "Escapees - Sharing the RV Lifestyle", is published bi-monthly. The Escapees operate eight 'Rainbow' RV parks and has eleven 'co-op' parks in the United States, that offer both permanent and transient sites. The fees for transient sites vary by location and range from \$2.50 for dry camping (no hook-ups) to \$18 per night. Some non-affiliated commercial campgrounds and RV parks extend reduced rates to Escapees members. Further, the Escapees offer medical care and assisted living facilities in Livingston, Texas for RVerS who have ceased to travel but continue to stay in their rigs. Many Escapees members who are full-timers designate Livingston as their home address for purposes of obtaining driver's license, motor vehicle registration, vehicle and other insurance, taxation, voting, mail delivery, etc.

Membership in Escapees is approximately 34,000<sup>35</sup> member families, and has remained constant for the previous five years<sup>36</sup>.

#### *Family Motor Coach Association (FMCA)*

The FMCA is a member owned and operated, not-for-profit organization with headquarters in Cincinnati, Ohio. It is comprised of a coalition of local and special interest chapters. Annual basic dues is \$35 (U.S.) per

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<sup>35</sup> E-mail correspondence October 17, 2005 from Mark Nemeth, Technical Advisor, Escapees RV Club.

<sup>36</sup> E-mail correspondence June 2, 2005 from Mark Nemeth.

family unit (including single individuals), and full membership privileges apply only to motorhome owners. FMCA provides a comprehensive range of services of particular interest to full-time and long-term RVers. These include mail forwarding service, emergency road assistance, various forms of insurance, credit card program, motorhome financing, Internet access, trip routing, etc. Member benefits also entail discounts at campgrounds, Camping World (selling RV equipment and supplies), gas stations, and other businesses. There are educational and social programs, including regional and central gatherings, and RV advocacy activities. The FMCA magazine, "Family Motor Coaching" is published monthly.

Membership in FMCA is in the range of 130,000<sup>37</sup> member families, and has increased by 13% over the past five years<sup>38</sup>. Four percent of FMCA members are Canadians.<sup>39</sup>

### *Good Sam Club*

The Good Sam Club is a subsidiary of the Affinity Holding Group Inc., a for-profit, investor owned direct marketing organization targeting North American RV owners and outdoor enthusiasts. Interests of Affinity Holding Group are extensive and include:

- various clubs, for example, Good Sam Club, President's Club (discount card for Camping World stores), Coast to Coast Club (discount camping at approximately 485 RV parks and campgrounds);
- Camping World stores throughout the United States,
- more than twenty-five periodical publications. Those with RV orientation include: MotorHome, Trailer Life, Coast to Coast Magazine, Camping Life, Campground Management, RV Business, and RV View. There are several annual or occasional publications, including the major campground travel references "Woodall's North American Campground Directory", and "Trailer Life RV Parks, Campgrounds, and Services Directory".

Annual dues for the Good Sam Club is \$19 (U.S.). Good Sam Club member services are directed towards a broad spectrum of RVers and encompass: discounts at many RV parks and campgrounds, fuel discounts, trip routing, emergency road service; and arrangements for vehicle liability insurance, extended vehicle warranties, vehicle financing, credit card, supplemental health and life insurance, and financial services. "Highways Magazine" is published monthly for Good Sam Club members.

During the previous four years Good Sam Club membership increased by 2.3%, as reflected in the number of member families below<sup>40</sup>.

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<sup>37</sup> As of September 1, 2003 membership was 127,479. Source: Don Eversman, "Executive Directors' Commentary" in "FMC Magazine". Internet website [www.fmca.com](http://www.fmca.com). June 19, 2005.

<sup>38</sup> E-mail correspondence June 2, 2005 from Beverly Spurgeon, Director of Member Services, FMCA.

<sup>39</sup> E-mail correspondence May 31, 2005 from Beverly Spurgeon.

<sup>40</sup> Affinity Group Holding, Inc., "United States Security and Exchange Commission Form S-4, filing April 15, 2005". 57.

<u>2001</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>
949600	946800	960600	958000	971000

### *RV Club Summary*

Memberships in the Escapees RV Club, FMCA, and Good Sam Clubs are not strictly additive to deduce an overall growth trend, because many RVers belong to two or even three of these clubs. Nevertheless, a composite view of the numbers suggests a growth of RVing in the range of 2.5% for the 2000 to 2005 period. The Escapees RV Club and FMCA appeal to the most heavily involved RVers. The five-year increase of 13% in the number of FMCA member families, in particular, suggests that the growth in RVing is concentrated among long-term and full-time RVers.

### RVers' Characteristics and RV Travel Market Concentration by Type of RVer

Depending on their free time, financial resources, and inclination, RVers have markedly different commitments to RVing. RVers spend differing amounts of time in their RVs, travel differing distances, and rely to differing extents on staying overnight in parking lots. Further, the diverse array of characteristics of RVers result in a range of needs and desires for campground facilities. Some RVers want full-feature campground resorts, others want simply a clean, safe, economical place to stay.

Survey information, conducted in 2001 by the University of Michigan for RVIA, provides the following general picture of RVers residing in United States <sup>41</sup>:

“ Today’s typical RV owner is 49 years old, married, with an annual income of \$56,000 - higher than the median for all households, according to a University of Michigan study. RV owners are likely to own their own homes and spend their disposable income on traveling - an average of 4,500 miles and 28-35 days annually, ... ”

A survey by the Escapees RV Club of its members in 2005 found the following demographic characteristics <sup>42</sup>:

- average age: 65 to 68 years
- travel with children: never 85.5%, 6 months or less per year 8.3%, over 6 months per year 1%
- average time spent in RV per year: 8.9 months (over one-half of members are full-timers)
- average distance traveled per year: 11,821 miles

A 2004 survey of the characteristics of FMCA members indicated that on average they spend 80 days annually in their motorhomes and travel 9,000 miles.

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<sup>41</sup> RVIA Internet website. RV Quick Facts. August 3, 2005.

<sup>42</sup> E-mail correspondence June 2, 2005 from Mark Nemeth.

### *Age Distribution of RVers*

A characteristic of actively traveling RVers is the prominence of middle and older age persons. Even though they might have an interest in RVing, the majority of younger adults do not have substantial free time nor income to devote to RVing. The capability to pursue RVing grows with age, as the duration of vacations and amount income generally increases. For most people the capability to pursue RVing rises markedly upon retirement. An RV Travel Internet survey provides the age distribution of RVers in Table 2.

TABLE 2	
Age Distribution of RVers	
RV Travel Survey March 20, 2004 3,665 responses Source: www.rvtravel.com August 25, 2005	
Age	Percent Distribution
29 or Younger	0.5%
30 - 39	4.3%
40 - 49	14.9%
50 - 59	35.0%
60 - 69	38.2%
70 - 79	6.5%
80 and up	0.6%
Total	100.0%

Based on this survey, fewer than 20% of all RVers are under the age of 50 years, and 45% are 60 years and older. (This suggests a considerably higher average age than the 49 years found in the University of Michigan / RVIA Survey cited above.)

### *RVer Finances*

RVer finances are an important economic consideration for RV tourism marketing. It is often mentioned that RVers are, on the whole, wealthy enough to pay to stay overnight in a campground instead of staying overnight in a parking lot for free. There are not substantial data on RV finances, but available information suggests that the financial resources of RVers are varied, and often limited.

The results of RV Travel Internet website surveys indicate that generally 58.6% of RVers financed the

purchase of their current RVs <sup>43</sup>, and that 52.5% are making payments <sup>44</sup>.

The 2005 survey by the Escapees RV Club determined the following distribution of its members according to their net worth (U.S. dollars). Of respondents answering question about their the net worth <sup>45</sup>:

- 48.1% had less than \$250,000,
- 22.2% were between \$250,000 and \$499,000,
- 18.4% were between \$500,000 and \$999,000, and
- 11.4% had one million dollars or more.

In their comprehensive study of the 'RV lifestyle' Dorothy Ayers Counts and David R. Counts determined the following per-person income distribution of income (U.S. dollars) of full-time RVers in a survey conducted in the mid-1990s <sup>46</sup>:

Question: "What is the approximate yearly income per person in your rig?"

- 3.6% less than \$5,000
- 15.1% between \$5,000 and \$10,000
- 27.0% between \$10,000 and \$15,000
- 18.7% between \$15,000 and \$20,000
- 16.9% between \$20,000 and \$25,000
- 18.7% over \$25,000

The number of persons traveling in a rig were: 11.7% singles, 84.1% couples, and 4.2% three or more.

#### *Months Spent RVing Per Year - RVers by Type*

Two surveys, one conducted for the RV Travel Internet website and the other conducted as part of this study, provide a look at the distribution of RVers according to the amount of time during the year they spend in their RVs. The comparative results of these surveys are presented in Table 3.

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<sup>43</sup> RV Travel Internet website survey August 20, 2005: [www.rvtravel.com](http://www.rvtravel.com) (October 9, 2005).

<sup>44</sup> RV Travel Internet website survey November 23, 2004: [www.rvtravel.com](http://www.rvtravel.com) (August 25, 2005).

<sup>45</sup> E-mail correspondence June 2, 2005 from Mark Nemeth.

<sup>46</sup> Dorothy Ayers Counts and David R. Counts, Over the Next Hill: An Ethnography of RVing Senior in North America, Second Edition (Peterborough, Ontario: Broadview Press, 2001). 283.



TABLE 3			
Time Spent in RV Annually			
RV Travel Survey November 17, 2003 1,661 responses Source: www.rvtravel.com August 22, 2005		Survey on the Effect on RV Tourism of the Overnight Parking Ban in Nova Scotia 331 responses July and August 2005	
Number of Months*	Percent of Responses	Number of Months	Percent of Responses
less than 1	20.1%	less than 1	6.3%
1 or 2	35.0%	1	11.8%
		2	14.2%
3 to 5	22.1%	3	12.4%
		4	9.4%
		5	9.4%
6 to 11	7.6%	6	8.5%
		7	2.7%
		8	2.7%
		9	1.5%
		10	0.6%
Full time	11.2%	11	0.6%
		12	19.9%
Est. Average	3.9 months	Est. Average	5.2 months
* response 'never' not counted.			

It is evident that these two surveys represent somewhat different populations of RVers. Compared to the survey conducted for this study, the RV Travel survey has more RVers who during a year spend a relatively short time in their RVs. In the RV Travel survey 24.1% of the respondents spend less than one month in an RV per year versus only 6.3% for this study's survey. At the other end of the scale, the study's survey has more full-timers; 19.9% of study's survey respondents are full-time RVers versus 11.2% for the RV Travel survey. The average total time in an RV is 3.9 months according to the RV Travel survey, but 5.2 months for this study's survey.

Despite differences in the survey results, both illustrate that there are three types of RVers which can be grouped according to time spent in an RV per year: vacationer (two months or less), long-term-timer (three to

eleven months), and full-timer (twelve months). The three types are characterized in Table 4. Estimates of percentage distribution and average months in an RV for each group are derived by averaging information from the two surveys in Table 3.

TABLE 4					
Types of RVers According to the Time Spent in an RV Per Year					
Type of RVer	Time in RV Per Year		Percentage of RVers in Canada and the United States		
	Number of Months	Estimated Average Months for Group	RV Travel Survey	Survey on the Effect on RV Tourism of the Overnight Parking Ban in Nova Scotia	Percentage Used in this Study
<b>Vacationer</b>	2 or fewer	1.1 months	59.1%	32.3%	46%
<b>Long-Termer</b>	3 to 11*	5.1 months	28.7%	47.8%	38%
<b>Full-Timer</b>	12	12.0 months	11.2%	19.9%	16%
<b>All RVers</b>		4.4 months	100.0%	100.0%	100.0%
* most long-termers spend between 3 to 6 months in an RV per year. According to the RV Travel survey three-quarters of long-term RVers are in an RV from 3 to 6 months. Similarly, the survey for this study indicates that four-fifths of long-termers are in an RV for 3 to 6 months.					

The distribution of RVers used in this study is very close to that obtained in the 2004 survey of FMCA members, where 45% said that they used their motor homes for vacation transportation, and 52% used them for extended living.

Based on the estimate of 9 million RVs ‘on th road’ in Canada and the United States, the estimated distribution by type of RVer would be:

<u>Type of RVer</u>	<u>Estimated Number of RVs</u>
Vacationer	4.1 million
Long-Termer	3.4 million
Full-Timer	1.4 million

#### *Distance Traveled Per Year*

In terms of distance traveled, the survey for this study indicates that the more months RVers spend in their RV per year, in general, the more miles they travel. This relationship is seen in Table 5.

TABLE 5		
<b>Relationship Between Number of Months in RV Per Year and Distance Traveled</b>		
Number of Months in RV Per Year	Percent of Responses	Average Miles Traveled Per Year
less than 1	6.3%	2,300
1	11.8%	3,900
2	14.2%	6,300
3	12.4%	8,000
4	9.4%	9,200
5	9.4%	10,100
6	8.5%	9,000
7	2.7%	6,400
8	2.7%	10,300
9	1.5%	11,400
10	0.6%	12,500
11	0.6%	14,500
12	19.9%	12,700
Estimated Average	Total	Estimated Overall Average
5.2 months	100.0%	8,400 miles
Source: Survey on the Effect on RV Tourism of the Overnight Parking Ban in Nova Scotia		

It is noted that the number of miles traveled declines from 10,100 for RVers spending five months in an RV to 9,000 miles for RVers spending six months, and to 6,400 miles for RVers spending seven months. These discontinuities in the trend could represent a ‘hunkering down’ effect where RVers spending six and seven months in their RVs tend to stay longer times a one or more places, thus traveling fewer miles than might be expected. There are two responses in the survey for RVers spending 11 months in an RV, therefore the high average miles traveled for this group, 14,500, could be caused by a unique proclivity to travel of the members of

this small sample <sup>47</sup>.

The group average miles traveled based on the survey for this study are as follows:

<u>Type</u>	<u>Average Miles Per Year</u>
Vacationer	4,600
Long-Termer	9,100
Full-Timer	12,700

*Concentration of the RVer Tourism Market*

In terms of the estimated number of RVs: 4.1 million for vacationers, 3.4 million for long-termers, and 1.6 million for full-timers, it would seem that the best strategy for businesses supplying the RV tourism market would be to cater to vacationers. But this would be wrong. A full appreciation of the market potential by type of RVer requires factoring in either the nights (or days) spent in an RV or miles traveled, or both. For example, the market demand for campgrounds (and restaurant meals, groceries, etc.) is determined both by the number of RVers and by time they spend in their RVs. Similarly, the demand for fuels is determined by the number of RVers and the miles they travel. It is likely that the demand for tourist attractions is influenced by both time spent in an RV and miles traveled.

Table 6 puts the current Canada-United States tourism market into perspective by combining the number of RVers by type with the amount of time they spend in an RV and the number of miles they travel.

TABLE 6					
<b>Estimated Relative Importance of Types of RVers in Canada and the United States</b>					
Type	Number of RVs <i>Percent</i>	Average Months in RV	Total RV Days / Nights <i>Percent</i>	Average Miles Traveled	Total RV Miles Traveled <i>Percent</i>
Vacationer	4.1 million <i>46%</i>	1.1	4.5 million <i>12%</i>	4,600	18.9 billion <i>28%</i>
Long-Termer	3.4 million <i>38%</i>	5.1	17.3 million <i>45%</i>	9,100	30.9 billion <i>46%</i>
Full-Timer	1.4 million <i>16%</i>	12	16.8 million <i>43%</i>	12,700	17.8 billion <i>26%</i>
All RVers	9.0 million <i>100%</i>	5.2	38.6 million <i>100%</i>	8,400	67.6 billion <i>100%</i>

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<sup>47</sup> Although there is a reasonable pattern between the number of months RVers spend in an RV and distance traveled, for individual RVers this tendency is often violated. This is illustrated by the correlation coefficient of only 0.48 between the survey responses for months in an RV and distance traveled.

Although still a significant component, vacationers comprise only 12% of the 38.6 million RV- nights in Canada and the United States. Long-termers and full-timers together constitute 88%. of the total RV-nights. In terms of miles traveled, vacationers represent 28% of the 67.6 billion RV miles traveled, while long-termers and full-timers make up 72%.

## **5. RELIANCE AND OPINIONS OF RVERS ON STAYING OVERNIGHT IN PARKING LOTS, AND COMPROMISE POLICY SOLUTION TO A PARKING BAN**

Staying overnight in parking lots while traveling is a significant part of the ‘RV lifestyle’. Even so, most of the time RVerS stay overnight in campgrounds and other venues. Although saving money is one reason RVerS stay overnight in parking lots, it is not the most prominent. As a rule, RVerS deplore their counterparts who abuse the practice of staying overnight in parking lots, by ‘setting up camp’ and / or staying more than one night, suggesting that there is room for regulation that RVerS would find acceptable.

### Reliance of RVerS on Staying Overnight in Parking Lots

Many Rvers rely on staying overnight in parking lots, especially while traveling. The 2004 FMCA survey of members indicated that 42% sometimes stayed overnight in “mall / store parking lots”. Three quarters of these, however, spent less than 10% of their nights there <sup>48</sup>. The 2005 survey of Escapees RV Club members found that of the approximate average of 271 days per year spent RVing: 40 nights (14.8%) were ‘boondocking’<sup>49</sup>, which can include overnighing in parking lots, 204 nights (75.3%) were in campgrounds or RV parks <sup>50</sup>, and the remaining 31 nights (9.6%) were elsewhere (e.g. with friends and relatives).

An RV Travel survey asked specifically “Have you ever stayed overnight in your RV at a Wal-Mart?” to which 46.3% responded “Yes”, 51.8% responded “No”( and 1.9% that they “Don’t Travel by RV”) <sup>51</sup> .

The survey for this study resulted in the distribution in Table 7 of RVerS by number of nights in a year they stayed overnight in a parking lots “Such as at Wal-Marts, other shopping centers, casinos, truck stops, etc.”.

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<sup>48</sup> E-mail correspondence May 31, 2005 from Beverly Spurgeon.

<sup>49</sup> ‘Boondocking refers to staying overnight or camping in other than a campground or RV park, where there are no designated sites, nor hookups for water, sewer, and electricity, nor supervision. Boondocking may be on open areas of public or private lands, highway rest areas, truck stops, and parking lots of churches, civic clubs, shopping malls, etc.

<sup>50</sup> E-mail correspondence of June 2, 2005 from Mark Nemeth.

<sup>51</sup> RV Travel Internet website survey November 14, 2003: [www.rvtravel.com](http://www.rvtravel.com) (August 27, 2005).

TABLE 7	
<b>Distribution of Number of Nights in a Year Stayed In Parking Lots</b>	
Number of Nights	Percent of Responses
none	9.4%
fewer than 5	29.3%
5 to 10	22.4%
11 -15	9.7%
16 -20	9.7%
21 - 30	6.6%
31 - 50	5.1%
more than 50	7.9%
Total	100.0%
Average No. of Nights	13.5 nights

This survey reflects a sharply higher incidence of RVers who stay overnight in parking lots, 90.6%, compared to 42% for the FMCA survey and 46.3% for the RV Travel (Wal-Mart specific) survey.

The number of nights that RVers stay overnight in parking lots in a year varies according to the amount of time that RVers spend in their RVs, as shown in the survey results presented in Table 8.

TABLE 8		
<b>Number of Nights Staying in Parking Lots by Months Spent in RV in a Year</b>		
Number of Months in RV Per Year	Average Number of Nights in Parking Lots Per Year	Estimated Proportion of Total Nights in Parking Lots
less than 1	1.8	12.1%
1	4.8	10.8%
2	8	10.7%
3	10.7	10.2%

TABLE 8		
Number of Nights Staying in Parking Lots by Months Spent in RV in a Year		
Number of Months in RV Per Year	Average Number of Nights in Parking Lots Per Year	Estimated Proportion of Total Nights in Parking Lots
4	11.9	8.8%
5	10.9	6.6%
6	22	11.3%
7	18.2	8.1%
8	11.8	4.6%
9	30.4	10.7%
10	36.5	11.6%
11	12.5	3.6%
12	23.8	6.6%
Total Average	13.5	9.1%

The average number of nights stayed in parking lots by types of RVers are as follows:

<u>Type</u>	<u>Average Number of Nights in Parking Lots</u>	<u>Est. Proportion of Total Nights in Parking Lots</u>
Vacationer	5.6	10.9%
Long-Termer	14.4	9.3%
Full-Timer	23.8	6.6%

For all RVers in the survey, the estimated proportion of nights in parking lots was 9.1%, implying that for each night an RVer stays in a parking lot, etc., about 11 nights are stayed in an RV park, campground, or elsewhere. The proportions of nights stayed in parking lots varies according to the number of months spent in an RV. Vacationers and long-termers have the highest proportion at 10.9% and 9.3% respectively. It is clear that staying overnight in parking lots is a small component of all RVer's accommodation. Even excluding those RVers who never overnight in parking lots, the proportion of nights for those that do is only 10.0%, or one night in ten.

A multiple regression was run using observations from the survey for this study with number of nights spent in parking lots per year as the independent variable and the annual number of months in an RV and the number of miles traveled as explanatory variables. The results of the model are as follows:

Multiple Regression Model on Number of Nights an RVer Stays Overnight in Parking Lots per Year

$$\begin{matrix} \text{Number of Nights} \\ \text{in Parking Lots Per Year} \end{matrix} = 1.5 * \begin{matrix} \text{Number of} \\ \text{Months Spent} \\ \text{in RV per Year} \end{matrix} + 0.6 * \begin{matrix} \text{Thousands of} \\ \text{Miles Traveled} \\ \text{per Year} \end{matrix}$$

Standard Error of Coefficients                      0.204                      0.131

Intercept constrained to zero (effect on R-Square is negligible)

R-Squared: 0.22

Number of observations: 331

The regression model illustrates the influence of time spent in an RV and distance traveled on the number of nights per year RVers stay overnight in parking lots. Interpreting the regression results: on average the number of nights an RVer stays in a parking lot, etc. per year increases by 1.5 nights for each month spent in and RV and by 0.6 nights for every thousand miles traveled per year. Each of the coefficients (i.e. 1.5 and 0.6) is statistically significant. The R-Square is also statistically significant, but its relatively low value of 0.22 (maximum theoretical value is 1.00) indicates that the pattern for individual RVers differ substantially from that predicted by the regression results.

Reasons RVers Stay Overnight in Parking Lots

The reasons that RVs stay overnight in parking lots are varied. An RV Travel survey specifically regarding Wal-Mart asked “For RVers who stay overnight for free at Wal-Mart stores: What answer BEST describes why you stay?”, with the following responses in Table 9.

TABLE 9	
Best Reason for Staying Overnight at Wal-Mart Stores	
RV Travel Survey March 12, 2005 1,814 responses Source: www.rvtravel.com August 27, 2005	
Reason	Percent of Responses
Convenience	22.6%
Stay only when too tired to go on	22.2%
Need to Shop, so why not stay?	17.5%
Save Money on Camping Fees	17.5%



TABLE 9	
<b>Best Reason for Staying Overnight at Wal-Mart Stores</b>	
No RV Park nearby	13.8%
Other	6.4%
Total	100.0%

The survey for this study likewise asked RVers why they stay overnight in parking lots, but did not constrain the scope to only Wal-Marts, nor did it require that answers be limited to simply the best reason. The decision to stay overnight in a parking lot, etc. may be based on a combination of factors. Further, the survey for this study expanded the range of possible answers. Table 10 lists the survey results.

TABLE 10	
<b>Reasons for Staying Overnight in Parking Lots</b>	
Reason	Percent of Responses*
Near shopping / services	54.0%
Easy to Find	51.0%
No campground in area	47.7%
Save money	40.3%
Campgrounds closed for season	36.3%
Campground's full	27.7%
Sense of freedom	19.3%
Be self-reliant	17.7%
Deal with emergency	12.0%
Other	28.3%
* based on 300 survey respondents who at least sometimes stay overnight in parking lots	

The responses to both the RV Travel survey and the survey for this study are self-evident. The RV Travel survey stresses convenience and finding a place to stay when too tired to travel. The survey for this study identified proximity to shopping, easy to find, and no campground in area as being the most important. For both

surveys a desire to save money is in the middle of the list of popularity for reasons that RVers choose to stay the night in parking lots. Also, both surveys indicate that RVers fairly often stay overnight in parking lots because there is not a campground nearby or nearby campgrounds are full or closed for the season.

*Reasons RVers Do Not Want To Stay Overnight in Parking Lots*

Staying overnight in parking lots varies substantially among RVers, and according to the survey for this study 9.4% never stay overnight in them. The survey for this study asked: “If you only very rarely or never overnight with your RV in a parking lot, please indicate below your reasons for not doing so ...”. The survey provided eight reasons, including ‘Other’, that might keep RVers from staying overnight in parking lots. The number of responses and percentage of survey respondents for each are shown in Table 11.

TABLE 11		
<b>Reasons for <u>NOT</u> Staying Overnight in Parking Lots</b>		
Reason	Number of Responses	Percent of Responses*
Noisy	55	16.6%
No hookups	42	12.7%
Not private	36	10.9%
Unfair to campgrounds / RV Parks	19	5.7%
No opportunity	18	5.4%
[Feel] Unsafe	18	5.4%
Not Dignified	16	4.8%
Other	27	8.2%
* based on all 331 survey respondents, indicating the proportions of all RVers that avoid staying overnight in parking lots for the listed reasons.		

The most prominent reasons for not staying overnight in parking lots are noise, no hookups, and lack of privacy. Campgrounds, in contrast, often offer peaceful settings, hookups, and privacy. A relatively small number of survey respondents were deterred from staying overnight in parking lots because they believed the practice was either unfair to campground / RV park operators, 5.7%, unsafe, 5.4%, and or not dignified, 4.8%. A small number simply had no opportunity to stay overnight in parking lots, 5.4%.

## Attitude of RVers Towards Staying Overnight in Parking Lots: Parking Lot Etiquette

Staying overnight in parking lots is a controversial subject amongst some RVers. For example, Internet newsgroup messages on the subject frequently contain criticism from newsgroup posters who label RVers that park overnight at Wal-Marts, etc. as freeloaders and a disgrace to RVing. The various survey evidence already cited suggests that most RVers do not share these negative sentiments.

There appears to be considerable and broad based condemnation among the RVing community, however, of RVers who abuse the practice of staying overnight in parking lots by 'setting up camp' and / or staying multiple nights. The concern is largely that a parking lot is not intended for camping nor as the base for extended visits in an area. For some RVers this is a matter of appropriateness and manners. For others there is concern that parking lot operators who do allow RVers to stay overnight will withdraw the privilege if they see it is being abused and / or drawing the ire of neighbors in the municipality who operate campgrounds / RV parks.

Major RV groups recommend 'parking lot etiquette' for RVers to follow. It is hoped that by following these practices RVers will avoid giving private campground / RV park owners fodder to pressure governments to abolish camping except in designated campgrounds / RV parks. Further, parking lot etiquette promotes good relations with parking lot operators by having RVers park unobtrusively, yet providing RVers with ample opportunity to shop at adjacent stores. The following list of guidelines are based on communiques of FMCA and the Escapees RV Club:

- a. Obtain permission from a qualified individual
- b. Park out of the way and leave a buffer between your RV and perimeter residences
- c. Limit your stay to one night!
- d. Do not put down awnings
- e. Do not place personal items outside your RV (e.g chairs, BBQ grills, pets)
- g. Avoid using slideouts if at all possible (note: this guideline is omitted in the most recent version)
- h. Do not use leveling jacks on asphalt
- I. Purchase fuel, food or supplies as a form of 'thank-you' when feasible
- j. Leave the area cleaner than you found it
- k. Practice safety precautions

The survey for this study asked RVers who "at least sometimes overnight with your RV in parking lots" if they follow RV etiquette guidelines. The parking lot etiquette practices, above, were referenced in the survey form. Table 12 indicates the distribution of responses to this question:

TABLE 12	
<b>When staying overnight in a parking lot do you follow RV etiquette guidelines?</b>	
Response	Percent of Responses*
Yes	94.0%
Usually	3.9%
Sometimes	2.1%
No	0.0%
Total	100.0%
* based on 281 survey respondents who at least sometimes overnight with RV in parking lots and answered the question.	

The responses suggest overwhelming compliance with the RV 'parking lot etiquette' guidelines. The implication of the survey is that those RVers who do not follow the guidelines are in a distinct minority, but even for most of them the infraction is infrequent.

The survey for this study asked four questions about RVers' opinions regarding various aspects of staying overnight in parking lots. Tables 13a through 13d contain the responses to the questions. Three of the questions were in the form of statements to which the options for responding demonstrated agreement, disagreement, or indifference.

TABLE 13a				
<b>Question: Where permitted by the parking lot operator, overnight RV parking should be generally allowed.</b>				
Response	Yes	No	Only in Emergency	Don't Care or No Answer
Percent of All Responses	90.6%	1.0%	5.4%	3.0%

TABLE 13b			
<b>Question: It is OK for RVers to 'set up camp' and stay as long as they want in a parking lot.</b>			
Response	Yes	No	Don't Care or No Answer
Percent of All Responses	0.6%	97.0%	2.4%

TABLE 13c			
<b>Question: Staying overnight in a parking lot, even for one night, is unfair to campground / RV park operators.</b>			
Response	Yes	No	Don't know or no Answer
Percent of All Responses	3.9%	93.1%	3.0%

TABLE 13d	
<b>Question: The Occurrence of RVers staying overnight in parking Lots ...?</b>	
Response	Percent of All Responses
Promotes the reputation of RVing	11.8%
Detracts from the reputation of RVing	12.4%*
Has no significant effect on the reputation of Rving	67.4%
Don't know	7.9%
No Answer	0.6%
* comments by respondents indicated that this response option is ambiguous because it did not distinguish between RVers who follow parking lot etiquette and those who do not.	

The survey responses tabulated in Tables 13a through 13d clearly indicate the following:

- The overwhelming majority of RVers, 90.6% in the survey for this study, believe that RV parking should be generally permitted where allowed by the parking lot operators. Another 5.4% would approve RVers staying overnight in parking lots in an emergency. Only 1% of respondents would not agree to RVers overnighting in parking lots, even in an emergency.
- The attitude of RVers, however, is strongly against RVers who 'set up camp' and stay as long as they want in parking lots. In the survey 97.0% condemn such behavior. Only 0.6% approve.
- RVers generally have very little sympathy with the contention that staying overnight in a parking lot is unfair to campground / RV park operators. Only 3.9% of survey respondents thought that it was unfair, while 93.1% thought that it was not.

- Regarding the effect of RVers overnighing in parking lots on the reputation of RVing, most RVers consider it to be neutral, in the survey 67.4% responded that there is no significant effect. About equal proportions responded that it promoted (11.8%) and conversely detracted (12.4%) from RVing's reputation.

## **6. RVER'S REACTION TO GOVERNMENT PROHIBITIONS ON THEIR STAYING OVERNIGHT IN PARKING LOTS**

The simplest and perhaps most effective reaction of RVers to prohibitions on staying overnight in parking lots is to avoid going to communities that have them. There are several reasons that many RVers object to such regulations:

- the inconvenience of searching out a campground /RV park when one is not available nearby, or if one is nearby it is full or closed for the season.
- the cost of RVing is increased by the price of staying in a campground / RV Park. This is especially annoying when RVers are forced to pay to stay in a campground / RV park in order to pull off the road for a few hours rest while traveling. In these instances RVers often do not utilize hook-ups and other campground / RV park facilities that they are paying for.
- feeling of not being welcome, caused by restrictions that imply: "Stay away from here. If you don't pay for a campground / RV park site ... this community does not want you".
- resentment towards rules by governments that limit the freedoms of individuals and businesses. In this case parking lot operators should be free to permit or not permit RVers from staying overnight, and where permitted RVers should be free to do so.

If too many communities adopt restrictions, thus making travel by RV too costly, impractical, inconvenient, or not agreeable, many RVers will curtail or cease RVing. The negative economic consequences of this would spread throughout RV manufacturing and sales enterprises and RV tourism service businesses, including campgrounds / RV parks.

The reason for imposing restrictions is primarily to help the local economy by increasing the revenues of campgrounds / RV parks. The restrictions would be self-defeating, however, if they cause a significant proportion of RVers to stay away from the community. Even a small reduction in RV tourism would adversely affect retailers, restaurateurs, fuel vendors, attractions operators, etc. Given that RVers on average stay in campgrounds / RV parks the majority of the time, if the reduction in RV tourism is greater than about ten percent the business of campgrounds / RV parks would also be negatively impacted<sup>52</sup>.

The survey for this study asked respondents how a state-wide or province-wide ban on RVers staying overnight in parking lots would affect their decision to travel to an area. Table 14 shows the survey results for all respondents, respondents by type, and for respondents who do not stay overnight in parking lots.

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<sup>52</sup> This conclusion is based on the survey evidence that RVers tend to stay in campgrounds / RV parks about 9% of nights. That is for every 11 nights in an RV only 1 is in a parking lot, etc.

TABLE 14					
Reaction of RVers to a State-Wide or Province-Wide Ban on Staying Overnight in Parking Lots					
Type of RVer (number of respondents in group)	Reduce Desire to Visit Area	Boycott Area	Increase Desire to Visit Area	No Effect	No Answer
Percent of Respondents in Group					
Vacationer (60 respondents)	48.3%	23.3%	3.3%	25.0%	0%
Long-Termer (205 respondents)	54.1%	29.3%	1.0%	15.6%	0%
Full-Timer (66 respondents)	43.9%	36.4%	0%	18.2%	1.5%
All Types (331 respondents)	51.1%	29.6%	1.2%	17.8%	0.3%
<i>RVers Who Do Not Overnight in Parking Lots (31 respondents - also included in the groups above)</i>	25.8%	9.7%	9.7%	54.8%	0%

For all types of RVers combined, a ban would cause one-half (51.1%) to reduce their desire to visit the area and nearly another one-third (29.6%) to boycott the area. A very small proportion, 1.2%, there would have increased desire to visit the area. For 17.8% the ban would have no effect on visitation. RVers of different types react somewhat differently, for instance, 83.4% of long-termers, 80.3% of full-timers, and 71.6% of vacationers have either reduced desire or would boycott an area.

An interesting sub-group of respondents to the survey are the thirty-one who do not stay overnight in parking lots, comprising or 9.4% of all respondents. Members of this subgroup include vacationers, long-termers, and full timers. The reactions of respondents who do not stay overnight in parking lots would presumably not be influenced by considerations of cost nor inconvenience. Yet, a ban would cause 25.8% of them to reduce their desire to visit an area and 9.7% would boycott it. Partially offsetting this negative result, 9.7% of these respondents would have increased desire to visit the area. For 54.8% there would be no effect. On balance, however, even for the sub-group of RVers who do not stay overnight in parking lots a ban would likely have a significant adverse impact on local RV tourism.

A case study on the economic impact of Nova Scotia’s prohibition on RVers staying overnight everywhere except licensed private and public campgrounds is described in section 9 of this study. For purposes of this case study the survey asked two Nova Scotia-specific questions: “What is the probability that you will take an RV trip to Nova Scotia within the next 5 years if the overnight parking ban i) remains or ii) is removed. The average probabilities for all respondents is 36.3% if the ban remains and 71.3% if it is removed. This dramatic impact is consistent with the general reactions shown in Table 14.

The survey did not specifically ask RVers if they are attracted to communities that allow RVers to stay overnight in parking lots, but such would seem to be the case. If so, it would benefit an area to promote RV tourism by adopting a policy specifically allowing RVers, within reason, to stay overnight in parking lots where permitted by the parking lot operator. While some RVers may be diverted from local campgrounds / RV parks, this would likely be more than offset by the increase in RVers coming to the area.

### A Compromise Policy Solution

The opinions expressed by RVers responding to the survey for this study and to other surveys lead to the following three considerations that are significant for jurisdictions that ban, or intend to ban, RVers from staying overnight in parking lots. They are:

- RVers are strongly in favor of the right to stay overnight in parking lots where approved by the parking lot owners,
- RVers in significant proportions tend to avoid regions where such a ban exists, and
- RVers generally are intolerant of their counterparts who do not follow parking lot etiquette.

With these considerations there appears to be room for a compromise where governments can maintain the good will and tourism business of RVers and yet reasonably protect the market of private campgrounds / RV parks. That is allow RVers to stay overnight in parking lots, but do not allow RVers to ‘camp’ in a parking lot nor stay multiple nights. RVers who follow parking lot etiquette would be allowed to stay for a night. The implication of the survey responses is that RVers would accept this compromise. The reason for RVers’ endorsement would not be from consideration of fairness to campground / RV park operators, but rather disdain for the few RVers who flaunt parking lot etiquette. This could be a powerful force in ensuring that RVers would not abuse the privilege of being able to stay overnight in parking lots.

## **7. ECONOMIC IMPORTANCE OF RV TOURISM IN NOVA SCOTIA**

In a 2001 study “Improving the Nova Scotia Campground Industry” Dr. Doug Crapo carried out a comprehensive economic impact analysis of RVing and other camping tourist activity in Nova Scotia<sup>53</sup>. This section of the current study uses many of Dr. Crapo’s findings and extends them to examine the economic impact of Nova Scotia’s prohibition on RVers staying overnight everywhere except in licensed private and public campgrounds.

There are numerous studies on the topic of estimating the economic impact of tourism, involving various jurisdictions and types of tourist activity. The economic effect is usually measured in terms of dollars of household income, government revenues, and employment generated as a result of expenditures by tourists. Tourist ‘direct’ expenditures initiate a chain of additional spending by businesses to purchase supplies and services, pay workers, remunerate investors, and pay taxes, all of which triggers other rounds of spending diffused throughout the local economy. The effect eventually fades as purchases of imports from outside the region, outward transfers of income and taxes, and savings by individuals and businesses (and governments) offset direct tourist expenditures. A statistic derived by input-output analysis, referred to as a ‘multiplier factor’, allows for the approximate calculation of the full economic impact of tourism expenditures.

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<sup>53</sup> Crapo, David,. “Improving the Nova Scotia Campground Industry” (prepared for the Tourism Industry Association of Nova Scotia by EXCEleration corp, May 2001).



In examining the economic impact of tourism in a region generally only those tourists visiting from outside are considered. The reason for this is stated by Dr. Crapo<sup>54</sup>:

“Campgrounds, as with other forms of tourism accommodation, require investment by entrepreneurs, financial and investment institutions, and governments (whose money ultimately comes from taxpayers). Most of the facilities created by such investment are used by both residents and visitors. While a private business may not care where a customer comes from, government agencies do have a particular interest in the ability of tourism development to attract visitors from outside their jurisdiction. As visitors come into an area, they spend money on a variety of goods and services. This new money creates income, jobs, and tax revenues in the community. This new income, in effect, pays back the entrepreneurs, investors, and government for their support of the initial tourism development. Tourism investment by destinations encourages visitor spending which, in turn, repays or rewards the investment that encouraged the visit and associated spending.”

Overview of RV Tourism in Nova Scotia

As a measure of tourism activity, the Nova Scotia Department of Tourism, Culture and Heritage compiles comprehensive data on the number of non-Nova Scotian automobiles and RVs entering the Province by origin (i.e. province or state). Such a tally is feasible because Nova Scotia is a peninsula and the entrance points are few<sup>55</sup>. Table 15 shows the number of Non-Nova Scotian RVs and automobiles entering Nova Scotia in 1997 through 2004.

TABLE 15								
Number of Non-Nova Scotian Vehicles by Type Entering the Province Thousands of Vehicles								
Year	1997	1998	1999	2000	2001	2002	2003	2004
RV	34.5	38.8	39.9	36.6	30	37	32.2	28.9
Automobile	431.5	499.1	626.2	616.3	600.9	588	566	574.8
Total	466	537.9	666.1	652.9	630.9	625	598.2	603.7
RV as % of Total	7.4%	6.7%	6.0%	5.6%	4.8%	5.9%	5.4%	4.8%
Notes: Vehicle counts derived by dividing published number of visitors by RV or automobile mode by respective average party size. Approximately 6% of RVs were tent trailers.								
Source: Nova Scotia Department of Tourism, Culture and Heritage								

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<sup>54</sup> Crapo.32.

<sup>55</sup> There are two roads into the Province, at Amherst and Tidnish (both connecting to New Brunswick), and four ferry entrance locations: at Caribou (connecting to Prince Edward Island), North Sydney (Newfoundland and Labrador), Digby (New Brunswick), and Yarmouth (Maine).

The vehicle counts encompass visitors to Nova Scotia for all reasons including tourism. A visitor exit survey conducted by the Nova Scotia Department of Tourism, Culture and Heritage in the year 2004 indicated that ‘general pleasure / recreation’ was the main reason for entering the Province for 51% of visitors in automobiles and 71% for visitors in RVs <sup>56</sup>. (Visit friends and relatives was given as the main reason for 25% of visitors in automobiles and 11% for visitors in RVs.)

The trend of RVs entering Nova Scotia from 1997 through 2004 is generally downward. The number of RVs entering in the four-year period 2001-2004 is 14.5% below that in 1997-2000. In 2004 the number of RVs entering was 27.6% below that of 1999, the peak year in Table 15.

The distribution of the origin of RVs entering Nova Scotia in 2004 was:

Atlantic Canada	28.6%
Quebec	8.8%
Ontario	25.8%
Western Canada	<u>6.7%</u>
Total Canada	69.9%
New England States	7.7%
Other Atlantic States	10.2%
Central States	7.5%
Western States	<u>4.7%</u>
Total United States	30.1%
Total	100.0%

According to the 2004 exit survey, RVers on average spent 8.5 nights in Nova Scotia. The distribution of average nights by accommodation type is shown in Table 16. Also included in the table is the total estimated number of nights by accommodation type spent by the 28,900 RVs which entered the Province in 2004. For all types of accommodations the aggregate number was 245,560 nights.

TABLE 16		
<b>Distribution of Average Nights of Accommodation in 2000 and Estimated Total Nights by Accommodation Type for 28,900 RVers Entering Nova Scotia in 2004</b>		
Location	Average Number of Nights	Total Number of Nights
Licensed fixed roof and private cottage	2.1	60,690
Home of friends or relatives	1.1	31,790
National or Provincial campground	0.7	20,230

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<sup>56</sup> Nova Scotia Department of Tourism, Culture and Heritage: “2004 Nova Scotia Visitor Exit Survey”, 2005. Appendix A, Table 8.

TABLE 16		
<b>Distribution of Average Nights of Accommodation in 2000 and Estimated Total Nights by Accommodation Type for 28,900 RVers Entering Nova Scotia in 2004</b>		
Location	Average Number of Nights	Total Number of Nights
Privately operated campgrounds / trailer parks	4.1	118,490
Other	0.4	11,560
Total nights	8.5	245,560
Source of average number of nights: Nova Scotia Department of Tourism, Culture and Heritage: "2004 Nova Scotia Visitor Exit Survey", 2005. Appendix A, (derived from) Table 16.		

Fifty-seven percent of the total nights spent by RVers were in public campgrounds or private 'campgrounds / trailer parks', for a combined number of 138,720 nights. The 'other' category, comprising 11,560 nights, includes RVers attending festivals, working RVers parked on construction sites, farms, etc., and presumably RVers staying overnight in parking lots.

The widespread economic importance of RVers visiting Nova Scotia is reflected in their pattern of expenditures, shown in Table 17. Total RVers' expenditures by category in 2004 is estimated by multiplying the array of average expenditures by type, determined by the "2004 Nova Scotia Visitor Exit Survey", by the 28,900 of RVs entering the Province in 2004.

TABLE 17		
<b>Estimated Expenditure Impact by Type of RVers Entering Nova Scotia in 2004</b>		
Type of Expenditure *	Average Expenditure by Type per RV	Estimated Aggregate Expenditure of 28,900 RVs Entering Nova Scotia in 2004
Fixed roof accommodations	\$138	\$3,988,200
Campground fees [all campgrounds]	\$129	\$3,728,100
Restaurants	\$255	\$7,369,500
Ferry & Air Fares	\$149	\$4,306,100
Auto - Repairs/Gas/Oil	\$287	\$8,294,300
Taxi/Car Rental	\$19	\$549,100

TABLE 17		
<b>Estimated Expenditure Impact by Type of RVers Entering Nova Scotia in 2004</b>		
Type of Expenditure *	Average Expenditure by Type per RV	Estimated Aggregate Expenditure of 28,900 RVs Entering Nova Scotia in 2004
Groceries & Liquor	\$140	\$4,046,000
N.S. Hand Crafted Products	\$76	\$2,196,400
Clothing Purchases	\$59	1705100
Other Shopping	\$4	\$115,600
Recreation & Entertainment (incl. entrance fees, tours, etc.)	\$81	\$2,340,900
Other	\$21	\$606,900
<b>Total Expenditure(\$)</b>	<b>1361</b>	<b>\$39,332,900</b>
* includes sales taxes.		
Source of average expenditures: Nova Scotia Department of Tourism, Culture and Heritage: "2004 Nova Scotia Visitor Exit Survey", 2005. Appendix A, Table 15.		

As previously mentioned, these direct expenditures initiate a series of subsequent expenditures by businesses for inputs from other businesses, payment of wages and taxes, and disbursement of earnings. They, in turn, trigger their own subsequent expenditures and distributions. Thus, there is a multiplier effect from the injection of new expenditure into the economy, such as occurs with RVers visiting Nova Scotia. The multiplier factors for total economic impact of RV expenditures in this study are borrowed from the "2004 New Brunswick Tourism Industry Performance Report"<sup>57</sup> Adequate multiplier factors for Nova Scotia were not available for this study<sup>58</sup>. Fortunately the input-output relationships for Nova Scotia and New Brunswick should be similar, and New Brunswick's multiplier factors are a reasonable substitute. Table 18 summarizes the factors and estimated total economic impact in terms of employment and provincial and municipal tax revenues in 2004 as result of an overall estimated expenditure of \$39.3 million dollars by RV tourists visiting Nova Scotia, from Table 17.

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<sup>57</sup> New Brunswick Tourism and Parks, "New Brunswick Tourism Industry Performance Report" (Province of New Brunswick, June 2005)

<sup>58</sup> The Government of Nova Scotia, in the Department of Finance, maintains the Nova Scotia Input-Output Model from which multiplier factors are routinely calculated for internal government use and approved studies. The author was refused access to this information. The Department of Tourism, Culture, and Heritage did provide multiplier factors, but these were inadequate because they did not include 'induced' (i.e. household sector) effects which are substantial in the economic impact of tourism expenditures.

TABLE 18		
Estimated Impact of RV Tourism in Nova Scotia in 2004		
Impact Type	Total Impact Factor per \$1 million of RV Tourist Expenditure	Total Impact of \$39.3 million of RV Tourist Expenditure
Employment - person years	27.8	1,092
Provincial Government Taxes	\$205,000	\$8,076,000
Municipal Government Taxes	\$44,000	\$1,729,000

Of note is the estimate of 1,092 person years of employment. Most of the direct employment associated with campground and other RVer-related activities occurs in the five months of late spring, summer, and early fall. Thus, the number of employment positions would be in the range of 2,000 during the camping season.

## 8. PROFILE OF THE NOVA SCOTIA CAMPGROUND SECTOR

Campground accommodations in Nova Scotia are provided by licensed private campgrounds and Provincial and National parks. (There are several community and municipal campgrounds which are licensed and regulated in the same manner as private campgrounds; in this study they are grouped with private campgrounds.) Table 19 summarizes the characteristics of the parks and campgrounds. Except for visiting Friends and relatives and attending licensed special events, these are the only accommodations in the Province where RVers who are members of the traveling public are legally allowed to spend the night.

TABLE 19						
Characteristics of Parks and Campgrounds in Nova Scotia 2004						
Type	Number	Approx. No. of Sites		Serviced Sites Available	Approx. Site Fee per Night (2005)	Season Dates (2005)
		Short-Term	Seasonal			
National Parks	2 parks (8 camping locations)	908	0	Some at C.B. Highlands Nat. Park	\$15.75 to \$28	May 20 to Oct.10 All year at Kejimkujik
Provincial Parks	20	1,550	0	No	\$14 basic, \$18 with flush toilets and showers	May 20 to Oct.10 or June 17 to Sept.5
Private Campgrounds*	130	7,900	3,300	In most campgrounds	\$25.30**	Varies: mid-May to end of October

### Table 19 Notes

\* includes community and municipal campgrounds. For number of sites refer to Table 20.

\*\* average of highest prices listed for each campground in “2005 Doers and Dreamers Guide / This is Nova Scotia”, presumably corresponding to peak season and including all available hook-ups (if any); no account is made for multi-night or senior discounts.

Sources:

Nova Scotia Department of Tourism, “2005 Doers and Dreamers Guide / This is Nova Scotia”.

Nova Scotia Department of Tourism, Culture and Heritage Internet website, “Tourism Insights”, April 30, 2005.

The total number of campground sites in Nova Scotia has been essentially constant since at least 1988<sup>59</sup>, as has the number of public and private campgrounds<sup>60</sup>.

The supply of private campground sites is divided into short-term and seasonal sites. Short-term sites are intended for use by members of the traveling public who stay fewer than 30 days at the campground. Short-term sites, whether public or privately operated, may be used by RVers and tenters. In private campgrounds the overwhelming majority of occupants of short-term sites are in RVs. Long-term sites are intended to be occupied for a period of 30 days or longer; these sites are not subject to Tourist Accommodations Act minimum standards.

In most instances, RVers visiting Nova Scotia would utilize ‘short-term’ sites of which there were about 10,400 in the year 2004. Private campgrounds supply about three-quarters of the short-term sites. Serviced short-term sites are mostly provided by private campgrounds (but not all private campgrounds have serviced sites).

Table 20 examines the distribution of short-term and seasonal site supply and occupancy rates as reported by private campground operators to the Department of Tourism, Culture and Heritage. Figures are for the month of August, which with July has the highest site utilization.

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<sup>59</sup> Crapo. 5.

<sup>60</sup> According to an official with the Department of Tourism, Culture and Heritage the number of private campgrounds has not changed significantly in twenty-five years.

TABLE 20						
Private Campground Supply of Sites in August						
Year		2000	2001	2002	2003	2004
Short-Term Sites	Number of Sites	7,468	7,408	7,877	7,958	7,903
	Occupancy Rate	29.3%	32.6%	34.1%	30.5%	29.1%
Seasonal Sites	Number of Sites	3,063	3,236	3,260	3,275	3,258
	Occupancy Rate	99.9%	99.9%	100.0%	100.0%	100.0%
Total	Number of Sites	10,531	10,644	11,137	11,233	11,191
	Occupancy Rate	49.9%	53.1%	53.4%	50.8%	49.7%

During the 2000 to 2004 period there was a modest increase of 6.3% in the total number of private campground sites. A strategy of the private campground industry is evident in the consistently full-capacity utilization of seasonal sites versus the relatively modest occupancy rate of short-term sites, in the range of 29.1% to 34.1% in August, depending on year. The strategy is to designate those sites that are occupied by seasonal campers as 'seasonal' with short-term sites being a substantial residual. The short-term site occupancy rates for private campgrounds in the 'camping' months before July and after August are invariably very low. For example in 2004 private campground short-term site occupancy was in the range of 9% in June and 13% in September.

Even though the number of short-term sites supplied are more than double that of seasonal sites, in terms of total nights sold seasonal sites predominate, as seen in the figures below.

<u>Type</u>	<u>2004 Private Campground Nights Sold</u>
Short-Term	202,847
Seasonal	<u>468,107</u>
Total	670,954

Source: Nova Scotia Department of Tourism, Culture and Heritage

Seasonal campers are primarily from Nova Scotia, which means that are not a significant contributor to the economic benefits flowing from RV tourism. As Dr. Crapo observed in his study, "Seasonal campers are usually from nearby, bring supplies from home and do not spend much money on other services /activities

available at the campground.”<sup>61</sup>

Campground sites generally, whether public or privately operated, may be used by RVers from Nova Scotia and elsewhere - and by tenters. Data are available on the number of party registrations in private campgrounds for all sites by origin, and the distribution is shown below for the year 2004.

<u>Origin</u>	<u>2004 Private Campground Distribution of Registrations</u>
Nova Scotia*	30.1%
Other Canada	38.5%
United States	23.7%
Other Country	<u>7.7%</u>
Total	100.0%

\* includes Nova Scotian seasonal campers

Source: Nova Scotia Department of Tourism, Culture and Heritage

Party registration data are distorted by RVers staying at multiple campgrounds, in short-term sites, during their travels in the Province. Never the less, the importance of RVers from outside of Nova Scotia, especially for private campground short-term sites is reflected in the distribution of registrations.

An estimated distribution of revenues in public and private campgrounds is shown in Table 21.

TABLE 21				
<b>Estimated Public and Private Campground Demand and Revenues of 28,900 RVs from Outside Nova Scotia in 2004</b>				
Location	Average Number of Nights per RV Party	Total Number of Nights	Approx. Average Fee per Night	Total Revenue*
National or Provincial campground	0.7	20,230	\$18	\$361,140
Privately operated campgrounds / trailer parks	4.1	118,490	\$25	\$2,954,750
Total nights	4.8	138,720		\$3,315,890
* Table 17 estimates a total of \$3,728,100 in public and private campground fees versus a total revenue of \$3,315,890 above. The estimates are based on different methods, nevertheless most of the difference is due to the inclusion of sales taxes in the fees reported in Table 17.				

Based on the estimates in Table 21, RVers from outside of Nova Scotia constituted about 17.7% of the

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<sup>61</sup> Crapo. 34.



total private campground sites sold in 2004. Assuming that these RVers occupied short-term sites, they would comprise 58.4% of the demand for private campground short-term sites. Their contribution to private campground revenue would have been about \$3.0 million, not including extra charges for laundry, snacks, etc.

### Problems of the Nova Scotia Private Campground Sector

The fundamental problems of the campground sector in Nova Scotia are due to:

- low site occupancy rates, near 50% (seasonal and short-term sites combined) at the peak of camping activity, and
- short camping season, with one-half of total sites sold, or nearly three-quarters of the short-term nights sold, occurring in a period of only two months, July and August.

Staff of the Nova Scotia Department of Tourism, Culture and Heritage advises prospective investors in new campgrounds to be wary of the low revenue that ensues under these circumstances.

The 2001 study by Dr. Doug Crapo, “Improving the Nova Scotia Campground Industry”, was critical of the lackluster nature of many private and public campgrounds in the Province and of inadequate management practices. The “Executive Summary” contains the following description:

“The camping industry in Nova Scotia is evolving slowly, some would say to [sic] slowly. The number of campgrounds and campsites has changed little during the last 13 years. While there has been a gradual growth in the occupancy levels during that period, there is still lots of additional capacity within the system. Low pricing, combined with excess capacity, has produced virtually nonexistent levels of profitability within the privately owned campgrounds.

“ ... Insufficient reinvestment and upgrading at most campground facilities is evident. Campgrounds look 'tired' with little curbside appeal. This is especially true for the private/municipal campgrounds, although facilities and equipment in the Provincial and National Park campgrounds also need upgrading. If Nova Scotia is to offer world-class camping experiences then additional investment is required to improve facilities. The product of camping is 'experiences', but those experiences are rooted in an attractive, functional facility.”<sup>62</sup>

Dr. Crapo found room for encouragement, however, with actions being taken by some private campground owners and by the inherent potential of Nova Scotia as a camping tourist destination:

“Private campground owners have started diversifying their products to attract different market segments, a positive trend. Other forms of accommodation such as camping cabins, cottages and rental RVs attract different users. Recreational facilities, events and services entice those in the region to visit. Some of the more successful campgrounds with diverse offerings for guests are correctly termed 'resorts'.

“ ... In short, Nova Scotia should take full advantage of its competitive advantages as a seasonal camping destination. Like Alaska, it has the attraction of being at the 'end of the road'. Unlike Alaska, attractions and services are scattered throughout the province within relatively short driving time. The different tourism regions offer different scenery and experiences, enticing visitors (if they know about the different offerings) to experience yet another aspect of Nova Scotia. Campers should be alerted that they

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<sup>62</sup> Crapo. i.

cannot ‘tour’ Nova Scotia in 3 days - - it will take at least 10 days in the Province in order to experience the diversity.”<sup>63</sup>

Dr. Crapo’s study resulted in twenty-one recommendations. Most of the recommendations involve ways to improve campground management and marketing practices. Others relate to implementing a “program of continuous upgrading and improvement for all campground operators ‘creating the best campground experience”<sup>64</sup>. Private campground operators were urged to increase fees to gain higher profits and be able to afford the investments needed to improve and upscale their facilities. A \$4 per night increase in charges at Provincial campgrounds was similarly advised. Further, the study recommended that a ‘camping industry task force’ be established to focus on industry-wide opportunities and problems. There were no recommendations dealing with indiscriminate camping which, as previously noted, was not then considered to be an issue by members of the Nova Scotia campground industry.

Between 2001 and 2005 private campground fees increased from about \$21.52 for a fully serviced site<sup>65</sup> to an average of \$25.30 (from Table 17, includes some unserviced or lesser-serviced sites). Charges at Provincial campgrounds were raised by \$4 per night in 2001<sup>66</sup>. Otherwise, there is no indication of a concerted and systematic follow-up on the study’s recommendations. Instead, in recent years the public policy emphasis of private campground operators has been to implore the Provincial Government to adopt stricter enforcement against indiscriminate camping.

In section 10 of this report there is a proposal for reduced campground standards to allow for lower cost camping opportunities. This is different than Dr. Crapo’s vision of upscaling private campground facilities perhaps with the addition of resort attractions. There is a strong rationale, however, for the desirability of low-cost camping to develop RV tourism based on the diversity of needs of RVers, their abilities to pay campground fees, and the campground amenities that are important to them. Given that Nova Scotia’s weather supports campground operation for only a few months of the year and that modern RVs are substantially self-contained, an appropriate strategy for at least a segment of the RV tourism market would be to minimize the capital cost required of campground operators and to let RVers bring the ‘investment’ with them.

Dr. Crapo’s analogy between Alaska and Nova Scotia as RV tourist destinations is somewhat appropriate. But, it should be noted that at the time of his study Alaska was renowned for inexpensive minimal service camping opportunities. For example, the coastal municipalities of Seward and Valdez had \$10 per night parking for RVers along their shores. Staying overnight at Wal-Mart parking lots was rampant (and often abused by RVers) as was staying overnight at roadside viewpoints and rest areas. In the absence of such opportunities many RVers would not go to Alaska despite its magnificence.<sup>67</sup>

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<sup>63</sup> Crapo. ii.

<sup>64</sup> Crapo. 57.

<sup>65</sup> Crapo. 49, Table 4.3.

<sup>66</sup> Nova Scotia Department of Natural Resources news release, “Provincial-Park Camping Fees Increased”, May 17, 2001.

<sup>67</sup> In the year 2000 the author and his wife spent the summer RVing in the Yukon and Alaska.

## *Extent of Indiscriminate Camping as a Problem for Private Campgrounds*

There are no official estimates of the incidence of indiscriminate camping in Nova Scotia. The apparently few specific complaints by private campground operators and subsequent investigations by the Department of Tourism, Culture and Heritage, suggests that there are not a great number of parking lots where it is occurring. Even in Wal-Mart parking lots the numbers of RVs spending the night, according to the author's observation, are modest<sup>68</sup>. Of the four Wal-Marts in the Metro-Halifax area the store at Bayers Lake is the most popular for RVers to stay the night, and in this regard the number of RVs rarely exceeds five. At some Wal-Mart stores in the Province there are very few or no RVs staying the night. With respect to other parking lots in the Province it is the author's observation that RVers staying the night is an infrequent occurrence. It is evident that RVing tourists engage in indiscriminate camping considerable less than 10% of their nights in Nova Scotia.

As previously noted, RVer respondents to the "2004 Nova Scotia Visitor Exit Survey" stated that they spent 0.4 nights, on average, in "other" locations while visiting the Province (refer to Table 16). In the "other" category would be nights spent by RVers staying at events and festivals having special events camping licenses, RVers who are not members of the traveling public but lived in their RVs at their work sites while employed in Nova Scotia, and RVers engaged in indiscriminate camping. The 0.4 nights comprising all of these reasons, however, equates to only about 5% of the total nights RVers spent in Nova Scotia. Regardless of the precise percentage, indiscriminate camping, whether by out-of-province or local RVers, would appear to be a minor cause of the very low short-term site occupancy rates at private campgrounds.

The position of Nova Scotia's private campground operators is different, however, as expressed in a July 16, 2005 newspaper article appearing in the Chronicle Herald (page F1). Business reporter Susan Bradley quotes Leanne Hachey, provincial affairs director for the Canadian Federation of Independent Business, among others, calling for stricter enforcement of the ban on RVers staying overnight in parking lots. The article asserts that indiscriminate camping is extensive and significantly diverts revenue from the private campground industry: "Statistics show the camping industry ... generates over \$21 million annually in outside earnings [created by tourists coming to the Province] ... But tourism operators estimate that up to \$25 million of their revenues are lost to indiscriminate camping". Further, "... a survey of parking lots around the province showed that in July, plenty of recreational vehicles were camping in prohibited areas .... A McDonald's restaurant near Antigonish even posted a sign that said 'RVs welcomes'"

In contrast, the data and analysis in this study estimates that the contribution to private campground revenue by RVers coming from outside the Nova Scotia in 2004 was in the order \$3.0 million (refer to Table 21), which is one-seventh the \$21 million claimed in Susan Bradley's article. It is not possible to deduce the logic behind the figure of \$25 million 'lost to indiscriminate camping'. Indeed, the maximum loss in revenue due to indiscriminate camping by RVing tourists could be no greater than \$6.2 million, not \$25 million. The \$6.2 million loss of revenue would occur only with the unreasonable assumptions that all 28,900 RVers visiting Nova Scotia camped indiscriminately all of the time, and that they would have otherwise stayed all nights exclusively in private campgrounds. In fact, visiting RVers spent about one-half of their nights in private campgrounds compared to all legitimate locations (refer to table 16), and the incidence of indiscriminate camping comprised at most several percent of RV visitor nights in the Province. As noted, the evidence in this study and observations indicate that the incidence of indiscriminate camping in Nova Scotia is not substantial, and the loss of revenue to private campgrounds is at most modest.

In the author's experience a 'RVs Welcome' sign at a restaurant or other tourism business generally

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<sup>68</sup> The author e-mailed Wal-Mart's Canadian headquarters requesting an estimate of the average number of RVs that stay per night during July and August 2004 at each store in Nova Scotia, but there was no response.

means that there is an ample parking lot for RVers to park while transacting business. It is not an invitation for RVers to stay the night.

The wide variance between the claims in the newspaper article and the information and the conclusions contained in this study signifies an exaggerated importance being placed on indiscriminate camping by private campground operators in Nova Scotia as a major cause of their problems. It is a counterproductive emphasis. Indeed, Nova Scotia’s ban on RVers staying overnight in parking lots has the effect of deterring many RVers from coming to the Province and, to a significant extent, their staying in private campgrounds.

**9. ECONOMIC IMPACT OF NOVA SCOTIA’S BAN ON RVERS STAYING OVERNIGHT EVERYWHERE EXCEPT IN LICENSED PRIVATE AND PUBLIC CAMPGROUNDS**

As seen in Section 6 (Table 14), of the RVers responding to the survey conducted for this study, 29.6% would boycott a jurisdiction that imposes a ban on RVers staying overnight in parking lots, and another 51.1% would have reduced desire to visit it. The reactions differ somewhat according to type of RVer (i.e. vacationer, long-term, full-timer), but is consistently negative. Even RVers who do not stay overnight in parking lots would, as a group, have reduced desire to visit the area. Nova Scotia is not immune to this reaction, despite its location as an attractive outpost destination. The consequence of Nova Scotia’s ban on RVers staying overnight everywhere except in licensed private and public campgrounds is for RVers not to visit Nova Scotia, or not come to the Province as often.

Reaction of RVers to Nova Scotia’s Ban on RVers Staying Overnight Everywhere Except Licensed Private and Public Campgrounds

The survey conducted for this study asked respondents: “What is the probability that you will take an RV trip to Nova Scotia within the next 5 years if the RV overnight parking ban i) remains and if ii) is removed. Comparing the two answers allows for calculation of the reactions of RVers to Nova Scotia’s current policy, and for calculating the extent that the policy is suppressing RV tourism. Table 22 presents the results of the survey in this regard.

TABLE 22			
Reaction of RVers to Nova Scotia’s Ban on Staying Overnight in Parking Lots			
Type of RVer (number of respondents in group)	Probability of Visiting Nova Scotia in RV within 5 Years, if the Ban ...		Percentage Increase in RV Tourism by Removing the Ban*
	Remains	Is Removed	
Percent of Respondents in Group			
Vacationer (60 respondents)	40.1%	65.1%	62.3%
Long-Term (205 respondents)	33.8%	76.0%	124.5%

TABLE 22			
Reaction of RVers to Nova Scotia's Ban on Staying Overnight in Parking Lots			
Type of RVer (number of respondents in group)	Probability of Visiting Nova Scotia in RV within 5 Years, if the Ban ...		Percentage Increase in RV Tourism by Removing the Ban*
	Remains	Is Removed	
Percent of Respondents in Group			
Full-Timer (66 respondents)	40.8%	62.4%	52.9%
All Types (331 respondents)	36.3%	71.3%	96.4%
<i>All Types Weighted by Nights Spent in RV per Year</i>	<i>37.6%</i>	<i>68.8%</i>	<i>83.0%</i>
* The increase in RV tourism is calculated by dividing the percentage probability of visiting Nova Scotia if the ban is removed by the probability of visiting if the ban remains.			

The '5 year' stipulation in the question allows RVers to mentally plan ahead, but also correspondingly magnifies the probabilities of coming to Nova Scotia in any single year. Thus, for all survey respondents, the probability of their coming to Nova Scotia in any particular year within the next five would be 7.3% (i.e. 36.3% divided by 5) if the ban remains and 14.3% (71.3% divided by 5) if it is removed. Whether considered on a five-year or single-year basis, this represents an increase in RV tourism of 96.4%, on average in any year. The probabilities vary by RVer type, with long-termers being most sensitive to the continuance of the ban. If the ban were removed long-termer RVer visits to Nova Scotia would increase by the rate of 124.5%. Full-timers are the least sensitive, but even the level of their visits would increase by 52.9% with the removal of the ban. When the responses to the survey by types of RVers are weighted according to their relative commitments to RVing (in terms of nights stayed in an RV per year as shown in Table 6) then removing the ban would potentially increase RVer tourism in Nova Scotia by 83.0%.

It is possible to distinguish between RVers' reactions, that is whether to boycott or have reduced desire to visit the Province. Table 23 displays the survey results for respondents who indicated that within the next five years they would not come to Nova Scotia (answered with zero probability) if the ban remains versus those not coming if the ban is removed.

TABLE 23		
<b>Reaction of RVers to Nova Scotia's Ban on Staying Overnight in Parking Lots - Boycott Effect</b>		
	Percent of Respondents who Have Will <u>Not</u> Visit Nova Scotia Within the Next 5 Years if the Ban ...	
	Remains	Is Removed
All Types of RVers (331 respondents)	33.8%	7.9%
<i>All Types Weighted by Nights Spent in RV per Year</i>	<i>34.6%</i>	<i>7.6%</i>

For all respondents 33.8% would not come to Nova Scotia if the ban remains, but only 7.9% would not come if the ban is removed. The implication of the survey results in Table 23 is that among respondents nearly three-quarters of the reduction in RV tourism in Nova Scotia would be due to RVers boycotting the Province. When the survey results are weighted according RV type then the boycott effect would be responsible for nearly seven-eighths of the total reduction.

*Is the Reduction in RV Tourism Now or In the Future?*

Has Nova Scotia's ban on parking everywhere except licensed private and public campgrounds already had an impact by reducing RV tourism? Or is the effect going to occur in the future? The answer is probably some of both. Not all prospective RVing visitors to Nova Scotia are aware of the ban before coming here. The survey for this study clearly indicates, however, that many RVers would be dissuaded from visiting Nova Scotia if they knew about the ban. In the experience of the author while researching this study, many RVers are unaware about Nova Scotia's policy; some simply do not believe that such a policy could exist. Compared to other provinces or states, Nova Scotia's policy is unique. RVers returning from Nova Scotia sometimes report that they either stayed overnight at a Wal-Mart parking lot or saw other RVers who were. The 'soft' enforcement against parking lot operators by the Nova Scotia Department of Tourism, Culture and Heritage further creates confusion amongst RVers. Indeed, by not having stricter enforcement the Department is balancing the desire of private campground operators to discourage indiscriminate camping while maintaining a low profile on a policy that would discourage RVers from visiting the Province.

The survey results in Table 22 seems to predict an increase in RV tourism as a result of removing the ban on RVers staying overnight in parking lots. The 83.0% increase in RV tourism (weighted results) assumes that RVers generally know about the policy and would be more inclined to visit Nova Scotia if it were removed. The survey data, however, could also be interpreted to show a decrease in RV tourism from current levels if RVers are generally unaware of the ban and are made aware of it. Below are the limits of the policy's effect, depending on the current knowledge of RVers about the ban.

<u>Current Knowledge of the Ban</u>	<u>Increase in RV Tourism if Ban is Removed</u>	<u>Decrease in RV Tourism if Ban Remains</u>
All RVers are aware	83.0%	0%
All RVers are not aware	0%	- 45.4%

As noted previously, TIANS and COANS have requested significantly greater publicity and stricter enforcement of the ban by the Provincial Government. Also, newspaper articles favoring the campground operators' position have become more frequent in the previous two years. If the proponents of improved notification and stricter enforcement are successful in making RVers better aware of the ban, it is likely that even more RVers will be dissuaded from visiting Nova Scotia. If all RVers were made aware of Nova Scotia's policy of not allowing RVers to stay overnight in parking lots, RV tourism in the Province would be depressed by as much as 45.4%. To the extent that RVers already know about the policy, RV tourism is currently being depressed.

Estimated Economic Impact of Removing the Ban on RVers Staying Overnight Everywhere Except Licensed Private and Public Campgrounds

For purposes of estimating the economic impact of the ban on RVers staying overnight everywhere except licensed private and public campgrounds, it is assumed that the ban will be removed and that the effect will be to increase in RV tourism in the future. The cost of the ban remaining, therefore, is the 'opportunity cost' of foregone benefits that would occur with removal of the ban. A parallel computation could be made assuming that maintaining the ban would depress RV tourism in the future, but the study is taking the more positive perspective. Using year 2004 activity as the baseline, removing the ban would result in an 83.0% increase in RV tourism. It should be noted that the increase would probably not fully materialize in the tourism season following removal of the ban. It will take time for RVers to generally become aware that Nova Scotia has removed this impediment to their visiting the Province. The reputation of Nova Scotia as being 'RVer unfriendly' has inertia that will, at least in part, remain for a number of years. Table 24 summarizes the projected ultimate effects of removing the ban in terms of the impact on private campground operations, sales revenue for various sectors receiving RVer expenditures, and economic indicators of employment and provincial and municipal government revenues.

TABLE 24

**Impact on RV Tourism Business and Economy of Nova Scotia of Removing the Ban on RVers Staying Overnight Everywhere Except Licensed Private and Public Campgrounds**

Effect	Status		Change
	2004 (Ban is in effect)	After Ban is Removed	
Number of RVs Entering Province	28,900	52,900	24,000
<b>Private Campground Operations</b>			
Total Short-Term Site Nights Sold (RV tourists and other campers)	202,847	301,194	98,347
Total Short-Term Site Occupancy Rate (RV tourists and other campers)	29.1%	43.2%	14.1 percentage points
<b>Revenues by Type *</b>			
Fixed roof accommodations	\$3,988,200	\$7,289,400	\$3,310,200
Campground fees [all campgrounds]	\$3,728,100	\$6,822,400	\$3,094,300
Restaurants	\$7,369,500	\$13,486,200	\$6,116,700
Ferry & Air Fares	\$4,306,100	\$7,880,200	\$3,574,100
Auto - Repairs/Gas/Oil	\$8,294,300	\$15,178,600	\$6,884,200
Taxi/Car Rental	\$549,100	\$1,004,900	\$455,800
Groceries & Liquor	\$4,046,000	\$7,404,200	\$3,358,200
N.S. Hand Crafted Products	\$2,196,400	\$4,019,400	\$1,823,000
Clothing Purchases	\$1,705,100	\$3,120,300	\$1,415,200
Other Shopping	\$115,600	\$211,500	\$95,900
Recreation & Entertainment (incl. entrance fees, tours, etc.)	\$2,340,900	\$4,283,800	\$1,942,900
Other	\$606,900	\$1,110,600	\$503,900
Total Revenues	\$39,332,900	\$71,979,200	\$32,646,300
* includes sales tax			



TABLE 24			
<b>Impact on RV Tourism Business and Economy of Nova Scotia of Removing the Ban on RVers Staying Overnight Everywhere Except Licensed Private and Public Campgrounds</b>			
Effect	Status		Change
	2004 (Ban is in effect)	After Ban is Removed	
<b>Overall Economic Impacts</b>			
Employment - Person Years	1,092	1,998	906
Provincial Government Taxes	\$8,076,000	\$14,779,100	\$6,703,100
Municipal Government Taxes	\$1,729,000	\$3,164,100	\$1,435,100

The estimated effects of removing the ban on staying overnight in parking lots are substantial for campgrounds and other sectors, and ultimately the total economic impact would spread throughout Nova Scotia's economy. The numbers in the Table 24 are self-evident in this regard, but worth emphasizing are: private campground short-term site nights sold per year would increase by 98,347 and the short-term site occupancy rate would increase by 14.1 percentage points; annual tourism-related expenditures by RVers would grow by \$32,646,300. Given the multiplier effect on tourism expenditures, overall annual employment in Nova Scotia would increase by 906 person years, annual Provincial Government revenue would increase by \$6,703,100, and the revenues of municipal governments would increase by \$1,435,100.

There are many assumptions underlying the calculations in Table 24, for example that private and public campgrounds in all regions can accommodate the increase in number of RVers especially during the peak months of July and August. Another assumption, affecting the benefits of increased RV tourism accruing to campground operators, is that the tendency for indiscriminate camping by RVers would be no higher than in 2004. This assumption is not entirely realistic given the reason for increased RV tourism is removal of the ban on RVers staying overnight in parking lots. Below is a sensitivity analysis of the proportion of RV nights spent in parking lots and the resulting effect on private campground nights sold and short-term occupancy rates, assuming an 83.0% increase in overall RVers coming to Nova Scotia.

Proportion of RV Nights in Parking Lots	Private Campground Site Nights Sold	Short-Term Site Occupancy Rate
Baseline	301,194	43.2%
10%*	271,000	38.9%
20%	241,000	34.6%
30%	210,800	30.2%
40%	180,700	25.9%
50%	150,600	21.6%

\* i.e. 10% of all RVer nights in addition to baseline proportion in 2004, etc.

There is uncertainty about the baseline proportion. Earlier analysis suggested that currently RVer-nights spent in parking lots in Nova Scotia is minimal. The sensitivity analysis assumes different percentages in addition to the baseline. With a baseline of 5%, for example, the sensitivity figure of 10% would mean that 15% of all RV nights would be spent in parking lots (similarly, sensitivity of 20% would translate into 25% of RV nights spent in parking lots). According to the sensitivity analysis, the proportion of RV nights spent in parking lots would have to be higher than the baseline by 30% before the number of private campground short-term nights sold and the short-term site occupancy rate would diminish to levels in 2004 with the ban in place. It is inconceivable that the 30% plus baseline rate of all RV nights spent in parking lots would ever occur. According to the survey data on RVers' propensity to stay overnight in parking lots, the percentage of RV nights spent in parking lots would be likely be less than 10% in total, even with the ban removed.

There may be a tendency for tourism officials in the Nova Scotia Government to be especially concerned for the businesses that they regulate. A concern for private campground operators, however, should not override the interests of other suppliers of tourism-related products and services and the larger economy in general. In the case of the policy of not permitting RVers to stay overnight in parking lots, it is evident that there is not a divergence of interests between private campground operators and other businesses. Based on a variety of information, the conclusion is clear that eliminating the ban would be beneficial to all. There may be scepticism about the dramatic effects foreseen, but even if they are one-half of that envisioned they would still be substantial.

## **10. RESTRICTIVE EFFECT OF NOVA SCOTIA MINIMUM STANDARDS FOR PRIVATE CAMPGROUND FACILITIES**

### Reason for Minimum Standards for Traveler Accommodations

A prominent reason for government regulation of business is to promote worker, customer, and occupant health and safety. That is to assure that workers, customers, and occupants are not subject to unreasonable risks, that warning devices are in place, and that safety equipment is available if there is an incident. The kinds of current standards cover worker health and safety, food processing and serving, production of electrical products, building codes, usage and transportation of hazardous substances, fire codes, etc. The goal is to prevent people and property from being injured. Regulation of traveler accommodation has the added dimension of providing a minimum level of comfort and privacy for travelers staying in lodging establishments.

In Nova Scotia regulations under the Tourist Accommodations Act specify minimum standards for fixed roof accommodations (i.e. motels, hotels, bed and breakfast establishments, etc) relating to room size, partitions, doors, locks, windows / ventilation, curtains / drapes. lighting, heating, bathroom facilities - private or shared, closets, beds, other furniture, drinking glass / cup, clock, radio, hallway and entrance lighting, emergency lighting, and so forth. Given that most travelers arrive at fixed roof accommodations with only a suitcase of clothes and personal items, it is reasonable for them to expect the remainder of their accommodation living needs to be met by the establishment. In terms of tourism marketing, Nova Scotia wants prospective visitors to be confident that their basic accommodation needs, at the very least, will be met. Within these standards there is a wide range of fixed roof accommodation types that may be offered, from low-cost rooming houses to luxury suites.

## *Minimum Standards for Campgrounds*

There are Nova Scotia minimum standards for private campgrounds, which are intended to assure campers of at least a basic level of comfort and privacy. For the types of campgrounds that RVs might use, among the minimum standards are:

- site size and frontage for RVs:<sup>69</sup>
  - . size at least 1,200 sq. ft., or 2,400 sq. ft. for new sites after April 1, 2004
  - . road frontage at least 20 ft., or 40 ft. for newer sites after April 1, 2004
  
- number of washroom facilities for sites designated as:
  - . 'unserviced' - one non-flush toilet for each gender per 20 sites
  - . 'partially serviced' - one flush toilet, one basin, and one shower for each gender per 20 sites
  - . 'fully serviced' (hookups for water and sewer are provided at the site) - at least one flush toilet, one basin, one shower for all such sites<sup>70</sup> .
  
- washroom facilities requirements where there is a flush toilet:
  - . located between 40 ft and 400 ft. from campsite
  - . in weatherproof building
  - . waterproof walls and floor, with drain
  - . ventilation by screened doors or windows, or fan
  - . at least one flush toilet, with privacy partition(s), locking stall(s), and each with coat hook, and sufficient toilet paper in dispenser(s)
  - . at least one sink, with mirror, hot and cold water, and adequate liquid soap from dispenser
  - . adequate electric lighting
  - . GFI if there is an electric outlet
  - . waste basket with lid
  - . sign outside indicating gender
  
- where there is a shower a private dressing compartment is required:
  - . shower stall to include private dressing compartment at least 32" by 48", with bench seat, and 3 clothes hooks
  - . protected from shower by waterproof curtain or partition
  
- non-flush toilet buildings:
  - . located not closer than 100 ft. from for water source, picnic table or campsite
  - . have self-closing door(s) with privacy lock(s)
  - . is ventilated and screened, and is painted inside and out
  - . has toilet tissue dispenser with adequate supply of toilet paper
  - . has a mirror
  
- supply of potable water within 150 ft. of each campsite

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<sup>69</sup> Size standards in the Regulations are specified in metric units, and are translated to Imperial units for this report.

<sup>70</sup> Full-service sites are excluded when counting the number sites for washroom facilities. For example, a campground where all sites are full-service requires a only one washroom for each gender regardless of the number of sites.

- each site must have a table
- any dumping station<sup>71</sup>:
  - . must be at least 100 ft from campsite, water supply, and service building
  - . have water and hose for cleaning
  - . be indicated by sign

Although these standards have a semblance of reasonableness, for RVers some are superfluous. Very often RV tourists come to see and participate in the surrounding activities, not to camp. The comfort and facilities they need or want are contained within their RV. This even applies to bringing their own outdoor table if one is desired.

### *Problem of Minimum Standards for Site Size and Road Frontage*

Perhaps the most costly of the minimum standards for campgrounds to meet are the most recent, in force since April 1, 2004, that doubles the minimum size of new campsites from 1,200 sq. ft. to 2,400 sq. ft. and doubles road frontage from 20 ft. to 40 ft. The intention is to give new campgrounds, and presumably new sites in established campgrounds, the ability to accommodate the larger RVs now on the road, which in the case of custom coaches are up to 45 ft. long and 13.5 ft. wide with slideouts extended.<sup>72</sup> Only a minority of RVers have RVs that would not be able to fit within 1,200 sq. ft. and some RV parks in other jurisdictions accommodate RVs of various sizes on even smaller ‘footprints’ with the RVs backed into long, narrow sites. That such RV parks appear to succeed in other jurisdictions, especially in or near urban centers, indicates RVers’ acceptance of relatively compact sites under certain circumstances.

In order to test the observation about RVers’ acceptance of camp site sizes of 1,200 sq. ft. or even smaller, a sample of the average site sizes in 118 privately-operated campgrounds in Canada and the United States was analyzed. The sample was taken from the “2005 Trailer Life RV Parks, Campgrounds, and Services Directory”<sup>73</sup>. The Directory indicates average site sizes by length and width for each listed campground and RV park. The Directory distinguishes between pull-through and back-in sites. Many campgrounds and RV parks have both, and where applicable both pull-through and back-in site measurements are noted in the listing. The sample includes two campgrounds per state in the United States and province or territory in Canada (there are no private campgrounds listed, however, for Northwest Territories and Nunavut). Each campground in the sample is in the vicinity of a separate urban or near-urban area, or at the convergence of major highways for jurisdictions not having two urban or near-urban areas. Table 25 summarizes the results of the analysis.

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<sup>71</sup> Note, campgrounds are not required to provide sewage disposal, neither in the form of hook-up nor dump station.

<sup>72</sup> “RV Buyers Guide 2004”, (Time and Space Inc. / Spencer Longshore, Scott Crompton, Ventura, California, 2004). 22, 23. The cost of the custom coaches is the range of one-million U.S. dollars.

<sup>73</sup> “2005 Trailer Life Directory” (TL Enterprises, Inc., Ventura, California, 2005)

TABLE 25			
<b>Analysis of Site Sizes of a Sample of RV Parks and Campgrounds in Canada and the United States</b>			
	All Sites <i>118 in Sample</i>	Pull-Through Sites <i>107 in Sample</i>	Back-In Sites <i>111 in Sample</i>
Average Number of Sites (smallest and largest)	117 (10 and 700)	53 (1 and 600)	74 (3 and 600)
Average Sites Sizes of RV Parks and Campgrounds (smallest and largest)	1,524 sq. ft.	1,693 sq. ft. (480 to 3,400 sq. ft.)	1,345 sq. ft. (480 to 3,000 sq. ft.)
Proportion of RV Parks and Campgrounds Having Average Site Size of 1,200 sq. ft. or Smaller	28.8%	24.3%	52.2%
Proportion RV Parks and Campgrounds Having Average Site Size of 2,400 sq. ft. or Larger	6.8%	10.3%	5.4%
Source: "2005 Trailer Life RV Parks, Campgrounds, and Services Directory" (TL Enterprises, Inc., Ventura, California, 2005)			

The overall average size of sites of RV parks and campgrounds in the sample is 1,524 sq. ft. for both pull-throughs and back-ins. Pull-throughs, on average are larger, at 1,693 sq. ft., compared to back-ins, 1,345 sq. ft. More than one-quarter, 28.8%, of RV parks and campgrounds have an average site size of 1,200 sq. ft. or smaller. This proportion rises to 52.2% when considering only back-in sites. At the higher range of site size only 6.8% of campgrounds have an average size of 2,400 sq. ft. or larger. Even for pull-through sites only 10.3% of the RV parks and campgrounds have an average site size of 2,400 sq. ft. or larger.

A minimum standard of 1,200 sq. ft. would seem to be acceptable in comparison to the average site sizes of RV parks and campgrounds in Canada and the United States, as indicated by the sample analyzed. Setting a minimum site size for campgrounds in Nova Scotia to 2,400 sq. ft. is raising the standard beyond which most of the RV parks and campgrounds elsewhere in Canada and the United States could not comply by a wide margin.

#### Effects of Excessive Minimum Standards Regulation and Role of Campground Ratings

Excessive standards regulation occurs when the minimum standard is higher than:

- required by legitimate health and safety considerations,
- warranted by the business and marketing circumstances of the campground operator, or
- needed to meet the reasonable collective objectives of the community of campground operators.

The result of excessive regulation is to drive up the costs of campground operations by the additional investment required to implement the mandated facilities and the recurring expense of maintaining them. The

consequence of higher costs is reduced profitability and possibility even business failure.

Higher costs due to excessive standards can also be a significant barrier to entry for new firms. This is especially likely when minimum standards are increased, but not applied to existing campgrounds as a result of 'grand fathering'. The doubling of minimum site size and road frontage in Nova Scotia is a case in point. The costs of operating existing campgrounds at their given capacity do not change, but new campground investment is discouraged by the additional outlay now needed to acquire and develop a significantly larger tract of land per site. Thus, the higher minimum standards present a barrier to entry. While the barrier protects existing campgrounds from additional competition, it can stifle new investment and innovation when and where it may otherwise be justified.

From the perspective of protecting consumers a campground rating system can substitute for otherwise unrealistic minimum standards. Ratings can inform consumers which campgrounds offer better (or worse) camping accommodation. Nova Scotia is a pioneer in the Canadian 'Camping Select' program that rates 4,500 participating campgrounds in Canada according to the two categories of 'Facility' and 'Recreation'<sup>74</sup>. As an alternative to forcing campgrounds to meet unrealistic minimum standards, the desirable qualities of campgrounds can be incorporated into a rating system so RVers (and tenters) are able to select which campgrounds are most appropriate for them.. As an adjunct to any official campground ratings there are already private rating organizations on which RVers rely. One such rating system is incorporated in the "Trailer Life RV Parks, Campgrounds, and Services Directory" published by TL Enterprises, that describes and rates 12,000 selected RV Parks and Campgrounds throughout North America. The Trailer Life directory assesses each RV park and campground on the basis of completeness of facilities, cleanliness of facilities and restrooms / showers, and visual appearance and environmental quality<sup>75</sup>.

Campground operators who wish to provide facilities that exceed the minimum standards are free to do so, and be rated accordingly. Perhaps they see the business advantage of offering a premium camping experience, as Dr. Crapo recommended in his study.

### What Kinds of Campground Facilities Do RVers Want?

It is evident that there is demand among RVers, as a group, for a range of types of campground accommodations, from barebones to up-scale. This is suggested in the varied results of three RV Travel Internet surveys, shown in Tables 26a through 26c, below. The first survey asked "What's the most you will pay for a campsite for one night?"; the second, "How Much is "too much" to pay to stay a night just to sleep and leave early next morning?"; and the third, "Generally speaking, how much extra will you pay for full hookups over no hookups?".

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<sup>74</sup> Nova Scotia Department of Tourism, "2005 Doers and Dreamers Guide / This is Nova Scotia". 34.

<sup>75</sup> Trailer Life RV Parks, Campgrounds, and Services Directory" (TL Enterprises, Inc., Ventura, California, 2005). 8.

TABLE 26a	
<b>What's the most you will pay for a campsite for one night?</b>	
RV Travel Survey: November 28, 2003 1,493 responses Source: www.rvtravel.com September 28, 2005	
U.S. Dollars	Percentage
\$5	0.7%
\$10	4.8%
\$20	30.4%
\$30	39.8%
\$40	16.1%
\$50	5.1%
\$60	1.3%
More	1.7%
Total	100.0%

TABLE 26b	
<b>How Much is "too much" to pay to stay a night just to sleep and leave early next morning?</b>	
RV Travel Survey: July, 2, 2005 1,830 responses Source: www.rvtravel.com September 28, 2005	
U.S. Dollars	Percentage
\$10 is too much	16.1%
\$20 is too much	39.3%
\$30 is too much	30.1%
\$40 is too much	7.0%
It doesn't matter how much, I'll pay it.	0.9%
Any amount is too much I'll find someplace free.	6.6%
Total	100.0%

TABLE 26c	
<b>Generally speaking, how much extra will you pay for full hookups over no hookups?</b>	
RV Travel Survey: March 5, 2005 2,564 responses Source: www.rvtravel.com September 28, 2005	
U.S. Dollars	Percentage
\$3 or less	8.8%
\$4 to \$6	29.9%
\$7 to \$9	18.6%
\$10 to \$12	24.1%
More than \$12	14.8%
Seldom or never pay for hookups	3.8%
Total	100.0%

The survey results in Tables 26a and 26b appear to be contradictory. In Table 26a, for instance, 35.9% of the respondents cumulatively indicated that either \$5, \$10, or \$20 U.S. is the most they would be willing to “pay for a campsite for one night”, but in Table 26b 55.9% responded cumulatively that either \$10 or \$20 U.S. (\$5 was not an option) is too much “to stay a night just to sleep and leave early the next morning”. The meaning of the two survey questions overlap, but imply different situations. Given acceptance of the adage ‘you get what you pay for’ both surveys, however, imply a wide range of preferences among RVers for campground quality and facilities. Further, sometimes the preferences depend on circumstances. The survey results in Table 26c likewise illustrate differing values placed on campground facilities, in this case full hook-ups versus no hook-ups at all. Some RVers, 8.8% in the survey, would be willing to pay \$3 U.S. or less for full hook-ups while others, 14.8%, would be willing to pay more than \$12 U.S.

There is a danger when minimum standards for campgrounds are set above the level that is acceptable by a significant number of RVers, because a segment of the market may be by-passed. The cost of campground operations will be driven higher, campground fees may need to be increased to cover the higher costs, and RV tourism will suffer because some RVers will not be willing to pay them. Campground operators who wish to provide facilities that exceed realistic minimum standards are free to do so. They are, thus, better able to distinguish their campgrounds from others, and are in a better position to capitalize on their value-added investments and services.

*Is There a Role for the Budget Campground?*

There is a temptation for businesses to deliver better service in the hope of being able to charge a higher price. The attraction is that any increase in cost associated with the added service will be more than offset by higher revenue. The assumption is that customers will be willing to pay a higher price, because they are receiving more in return. There is a flaw in this logic when customers do not place a sufficiently higher value on the added



service; attempts to increase business volume and or raise prices will be resisted and the higher cost will not be recovered. There is an alternative business model, however, which has been very successful and promotes the concept of lowering service and charging customers less. The fast-food restaurant industry is based on this model and there appears to be latitude for this model to be applied to certain campgrounds, assuming that government-imposed minimum standards do not prevent it.

One of the wistful requests of some RVers is for the \$10 per night camping site, where an RVer will feel welcome, have a quiet and safe place to park for one or several nights, with limited services, for a correspondingly modest campground fee. Discussion by RVers in Internet newsgroups frequently mention that they would be satisfied to stay in a 'farmer's field' if it were allowed, for a nominal fee. A similar sentiment was included in an e-mail message in April 2005 to the author of this study from David and Dorothy Counts, former representatives for the recreation vehicle industry, renowned for their studies of RVers, and authors of the book "Over the Next Hill, an Ethnography of RVing Seniors in North America" (Broadview Press, Peterborough, Ontario, second edition 2001):

"In your work with the NS Tourism people, you might want to make a number of points:

"(1) regardless of what campground owners claim, people who sleep in Wal-Mart parking lots, truck stops, in rest areas, etc. are not camping, and they are not driven by a burning desire to park in store parking lots! They are spending a few hours off the road in order to get some sleep.

"(2) Many are on limited budgets and resent attempts by government and business to force them to pay twenty or thirty dollars to sleep when they are tired. They have invested in rigs that are self-contained and unless they are staying in a place for several days, they have no need of hookups, dump stations, etc. They need only space, preferably safe and quiet space.

"(3) If campground owners could be persuaded to offer inexpensive dry-camping (at, say, two to five dollars/night) they would earn the good will of these folks and make a profit, too, since those dry-campers would spend their money in their stores, laundromats, games rooms, etc. (Why they cannot figure this out is a mystery to us; we have made this suggestion before.) If they did this and made it known, they would have no need to ban parking lot destination boondocking.

"(4) Campground owners and Provinces who ban this practice are shortsighted. If the word gets out -- and it will -- that NS is not friendly to destination boondockers they will take their business and their tourist dollars somewhere else."

### *Restrained Investment Strategy for Campgrounds*

The annual payback time frame for investment in private campground facilities and infrastructure averages approximately four to five months for seasonal campsites and two to three months for short-term campsites. For a reasonable rate of return on an annual basis, an investment in a campground must provide earnings that are between three to six times higher during the few months of operation compared to a similar investment in a business in operation for a full year. This is a very difficult goal for a campground business to achieve. Under the circumstances there are three restrained-investment strategies, or combination of strategies, that a campground operator may try:

- concentrate on building facilities and infrastructure to accommodate seasonal campers, with whom the annual period of return is longest, and accept short-term campers to the extent that the existing infrastructure and facilities can be utilized with minimal additional investment.

- amalgamate the campground operation with a full-year or companion business so that facilities, infrastructure, staff, and management can be shared at least to some extent in both operations.

- operate a campground but provide a barebones operation not requiring significant investment. Such a campground may have neither water nor sewer hook-ups, and any electrical hook-up would be low-amperage. The sites would likely be small. A fresh water / dump station would be required.

Any restrained-investment strategy will likely involve compromises in the quality of campground facilities, and government minimal accommodation standards should allow for these as long as the health and safety of RVers is reasonably assured. The basic comfort of RVers, access to toilet and washroom facilities, and to some extent availability of electricity can all be provided for within the RV. Investment in the RV by RVers substitutes for the campground owner's investment in the campground.

An investment-restrained campground would be appealing to RVers by charging lower fees, being in a desirable location, and possibly having value added features, for example nature walks, outdoor cookouts, community campfires, and evening entertainment. Not all RVers would want to be without full-hookups nor be in otherwise spartan campgrounds. Indeed, as noted some RVers are willing to pay a premium for full-hookups and up-scale features. In these instances the fees for full-hookups, large sites, etc. can be high enough to yield a reasonable return on the investment.

## **11. RECOMMENDATIONS FOR THE GOVERNMENT OF NOVA SCOTIA**

The data and analyses in this report lead to two sets of recommendations for changes in the regulation of RV parking and of campground minimum standards in Nova Scotia. The recommended changes are intended to increase RV tourism in the Province to the benefit of the tourism sectors and the overall economy. One thing appears certain, the 'status quo' is not a formula for building RV tourism in Nova Scotia. Harsher enforcement of RV parking rules and higher minimum standards for campgrounds will be counterproductive. Nova Scotia has to shed its reputation of being RV unfriendly, and the campground sector needs the flexibility to provide a range of RVer accommodations, from barebones to luxury resorts, to appeal to the diverse preferences of RVers. The goal is to remarkably increase the number of RVers visiting Nova Scotia, to have them come earlier and later, and stay longer.

### **1. Eliminate or Reduce the Prohibition On RVers Staying Overnight Everywhere Except Licensed Private and Public Campgrounds**

Survey evidence from various sources cited in this study indicates that one-half, or more, of RVers in Canada and the United States stay overnight in parking lots from time to time. The option of staying overnight in store or mall parking lots, truck stops, casino parking lots, roadside rest areas, etc. is important to many RVers, especially when they are traveling. A province-wide (or statewide) ban on RVers staying overnight in parking lots will cause RVers to boycott the area or at least have reduced desire to visit it.

The survey conducted for this study shows that eliminating the ban on RVers staying overnight in parking lots, etc. will increase RV tourism by as much as 83% (or protect RV tourism from declining substantially further than it is now). The evidence further suggests that on average for every RVer night spent in a parking lot, as many as ten or eleven more nights will be spent at private and public campgrounds and other 'legitimate' locations. This study examined the sensitivity of the potential for increased indiscriminate RVer

camping versus increased RVer utilization of private and public campgrounds if the ban on RVers staying overnight in parking lots is removed. The conclusion is that, on balance, removing the ban will increase RVer tourist utilization of authorized campgrounds, perhaps significantly. **Therefore, the preferred recommendation in this regard is to remove the ban.**

Removing the ban entirely raises the specter of rampant indiscriminate camping, parking lots crowded with RVs set-up to stay for many days and nights, where permitted by parking lot operators. This is not a typical situation in other provinces and states where there is not now any region-wide prohibition against indiscriminate camping, but such has occurred in, for example, in previous years in Anchorage, Alaska. The survey conducted for this study indicates, however, that nearly all RVers are opposed to their counterparts 'setting up camp' in parking lots and staying for more than one night. Further, nearly all RVers surveyed profess to observe 'parking lot etiquette' promoted by major RVer clubs, which includes staying no longer than one night in a parking lot. This suggests that a compromise ban may be acceptable to most RVers. The compromise would be to allow RVers to stay overnight in a parking lot, where permitted by the parking lot operator, for a maximum of one night. RVers who resent any government dictates on where RVers can stay overnight would not be fully mollified by the compromise policy. But, with the compromise Nova Scotia would be able to claim that it is RV friendly, and has adopted parking lot etiquette guidelines that are accepted by most RVers and recommended by major North American RVing clubs.

There may be a concern that permitting RVers to stay in a parking lot for only one night is unenforceable. (Who is to count the number of nights an RVer stays in a parking lot?) However, there is already an issue of enforcement with the present complete ban on RVers staying overnight in parking lots. Further, it appears that the Provincial Government is hesitant to 'crack down' on parking lot operators that allow RVers to stay the night, because strict enforcement would worsen Nova Scotia's reputation for being RV unfriendly and deter even more RVers from visiting the Province. The solution to enforcement of a compromise ban is to widely advertise the policy that staying for one night is permitted, where allowed by the parking lot owner, but staying any longer is not. Parking lot etiquette guidelines can be prominently displayed without timidity in Nova Scotia tourism literature and visitor information centers. A reduced ban further recognizes that staying for a night in a parking lot is justifiable when RVers are traveling and want a night's rest, or when nearby campgrounds are not available, are full, or closed for the season.

The extent that parking lot operators would allow RVers to stay the night if there is a partial ban is uncertain. For some, allowing RVer parking for a night would be in their business interests. On the other hand, very few, if any, parking lot operators would gain by having RVers camp in their parking lots for multiple nights. In this respect, parking lot operators themselves would see an advantage in a 'one night, no camping' rule that they could enforce. A way to encourage this would be for the design of a standard sign that parking lot operators could post stating "RVers - No Camping / Staying for One Night Allowed". It would behoove businesses that want to allow RVers to stay a night in their parking lots to post such signs, thus giving RVers an opportunity to shop or conduct other business, without having RVers abuse the offer of overnight parking. Admittedly, with a reduced ban it is possible for RVers to stay in a sequence of parking lots, each for one night, while visiting Nova Scotia. This would be a very unsatisfactory and inconvenient way to tour the Province, and is not likely to occur often. **Therefore, as a compromise regulation, RVers would be permitted to stay overnight in a parking lot for one night, where allowed by the parking lot operator, and be encouraged to observe parking lot etiquette.**

Under any circumstances, the ban on RVers staying overnight in parking lots should be modified to apply only during the camping season, as defined by when the majority of the Provincial parks are open. Further, staying overnight in a parking lot should be permitted anytime there is a medical, road condition, or mechanical emergency. This is not a matter of promoting (or sustaining) RV tourism. Rather it is recognition of the serious consequences to RVers in peril when parking lot owners steadfastly obey the present regulation. Even Nova

Scotians traveling within the Province are endangered by the complete ban<sup>76</sup>. **Therefore, defects in the current regulation, at a minimum, must be corrected to permit RVers to stay overnight in a parking lot when campgrounds are closed for the season, or when encountering hazardous or emergency personal or travel conditions.**

## 2. Modify the Minimum Standards for Private Campgrounds to Allow for a Wider Range of RVer Accommodation

Businesses generally face some form of government regulation to assure the health and safety of employees and customers. In the accommodation industry, regulation is extended to provide a minimum level of comfort and privacy for guests. The current minimum standards for campgrounds in Nova Scotia are excessive with respect to RVs. A prime example of higher than needed standards is the increase in minimum site size from 1,200 sq. ft. to 2,400 sq. ft. The evidence is clear that the majority of campgrounds and RV parks in Canada and the United States could not now meet the 2,400 sq. ft. lot size requirement. Other excessive minimum standards are the 40 ft. site road frontage, a table at each site, and more washrooms than needed when full hook-ups are not provided. The negative affect of excessive standards is to increase barriers to entry for new campground operations and to inhibit expansion of existing campgrounds. Excessive standards also compress the diversity of campgrounds available to RVers. The result of such standards means that the diversity of RV parks and campgrounds, which are common elsewhere, would not be allowed in Nova Scotia.

For the most part, what a campground offers in the way of facilities should be determined by the operator's business strategy. Many RV tourists want full services, large sites, cable hookup, Internet WiFi, resort environment, etc., and are willing to pay a appropriately for them. Others want a barebones place to stay while touring an area. There is an economic rational for not forcing campground operators to invest in campground facilities beyond that wanted or needed by RVers. The return on investment for campground facilities is compressed into a period of 5 months, even less when it is considered that nearly three-quarters of the revenue from short-term campers is earned in July and August. Under such circumstances it is not efficient, nor profitable, to invest more than is necessary to attract customers. Indeed, most RVers bring their comforts with them. **Therefore, it is recommended that minimum standards for campgrounds catering to RVers should be relaxed to meet a lower goal of protecting health and safety, and thus allow campground operators the freedom to provide the range of facilities that best conform to their business strategies.**

With the relaxation of minium standards additional attention must be given to informing RVers about the qualities of the campgrounds where they might be staying. These qualities could be related in the "Doers and Dreamers Guide" and any other government literature systematically describing individual campgrounds. In addition to the current description of location, number of sites, facilities, prices, etc. in the Guide would be:

- a designation indicating 'RV Only' or 'RVs and Tents' (or 'Tents Only'),
- the capability to accommodate large RVs,
- typical campsite size,

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<sup>76</sup> On one occasion, in late March while towing their trailer, the author and his wife encountered freezing rain in Nova Scotia while returning from spending the winter in the United States. All campgrounds were closed for the season. Despite hazardous road conditions, under the present law it would be illegal for a parking lot operator to allow them to stay for the night until road conditions improved.

- number and type of washrooms, and

- characterization of the type of campground by category, as designated by the campground operator, for example:

. 'resort' (where RVers go to spend substantial time enjoying the attractions of the campground),

. retreat (a restful and / or interesting place for RVers to stay, but without the full attractions of a resort), or

. 'abode' (a place to stay while visiting the area, but without significant intrinsic campground attractions).

Further, in the listing descriptions campground operators should be given ample opportunity to tell about the attractions or other benefits of their campgrounds. Campground operators may even boast if they provide a truly outstanding campground experience. The expanded descriptions and characterization by type would supplement, not replace, the Camping Select rating system.

**It is further recommended that government publications describing individual campgrounds, e.g. the "Doers and Dreamers Guide", include expanded information about the campground's features and type, and that in the description a campground operator be given ample opportunity to explain the attractions and benefits of his / her establishment.**

## **12. COMPILATION OF COMMENTS BY RESPONDENTS TO THE SURVEY FOR THIS STUDY**

One hundred and seventy-nine of the 331 respondents to the survey conducted for this study included comments in their responses. The request for comments in the on-line survey form was wide-ranging in terms of possible subjects, and suggested topics such as: "RV overnight parking, this survey, your experience visiting Nova Scotia, or whatever". The purpose of comments is to allow survey respondents to give additional information beyond that obtained in the structured questions and response options. At the least, the ability to comment provides an opportunity for respondents to criticize the structured part of survey, for example that the questions were inadequate or biased, or to condemn the entire exercise as being without merit or ridiculous. With one minor exception, no comments of this nature were made. (The exception concerned the question about the occurrence of RVers staying overnight in parking lots affecting the reputation of RVing, which resulted in the comment that the answer to the question depended on whether RVers observe 'parking lot etiquette'.) This indicates that the survey was generally taken seriously by the respondents and that they felt their responses to the structured questions were reasonably comprehensive and could be interpreted fairly.

The comments are presented in the attached table. Also included is information from the structured part of the survey on province or state of the respondents (two letter abbreviations as used by postal authorities), RVer type ('VAC' for vacationer, 'L-T' for long-termer, and 'F-T' for full-timer), and the probabilities that respondents would take an RV trip to Nova Scotia within the next 5 years - depending on whether the ban on RVers staying overnight in parking lots remains or is removed. This information helps put the comments in context. Included in the table is the survey response number which was assigned when the surveys were processed for tabulation. There is no significance to the number other than to be an index.

There is also a code in the comments table interpreting the nature of the comment and survey response in general as being in favor of removing the ban (code 0), maintaining the ban (code 2), or expressing no preference

(code 1). The code allowed sorting the comments into groups according to preference. There were 155 responses with comments / surveys judged to be in favor of removing the ban, 9 for maintaining the ban, and 15 with no preference. Within the groups, however, there is a wide variation of intensity of opinion, and the strength of feelings can be judged by reading the comments and looking at the respective probabilities of respondents visiting Nova Scotia.

Other than to group the comments according to the respondents' preferences concerning the ban there was no other categorical tabulation of the comments. The following observations are apparent, however:

- Two comments indicated a misunderstanding that Nova Scotia's ban on Rvers staying overnight in parking lots applied to parking on the property of their friends and relatives. (The prohibition is not interpreted by authorities as applying to the private property of friends and relatives.)
- There were many comments:
  - . favoring RVerS observing 'parking lot etiquette'
  - . about the need for inexpensive places to stay
  - . noting significant expenditures at Wal-Marts and other stores by the respondent when allowed to stay the night in parking lots
  - . explaining that the respondent stays overnight in parking lots while traveling, but the prefers to stay in campgrounds when visiting an area.
- Some comments mention that campgrounds are too small for their large rig, which can fit into parking lots.
- Several comments noted difficulty finding a campground that was not full in the Halifax area.

The comments were copied directly from the survey forms, without editing except to remove the names and e-mail addresses sometimes added by the respondents. Removing identifying information maintained the anonymous nature of the survey. The comments frequently contain typographical, spelling, and other errors of syntax. These are a fact of life when conducting an on-line survey. There was no on-line spelling checker nor easy option for printing a comment for review. The importance of the comments is in what is said in them, and the meaning is nearly always clear. Some comments are short and others long. The advice given is important to consider and helps put the analyses elsewhere in this paper into perspective. Along with information from the structured responses the comments helped frame the analyses in this study.