

Washington Outdoor Alliance

Access Fund • American Alpine Club • American Whitewater • El Sendero Backcountry Ski Club
Evergreen Mountain Bike Alliance • The Mountaineers • Washington Climbers Coalition
Washington Trails Association

1 December, 2014

RE: Draft Motorized Trail Use Policy and Fee Schedule for State Parks long-distance trails

The Access Fund, American Alpine Club, American Whitewater, Evergreen Mountain Bike Alliance, The Mountaineers, Washington Climbers Coalition and Washington Trails Association - all human-powered recreation organizations in Washington State - come together as a coalition on issues relating to recreation, access and conservation. As the group Outdoor Alliance Washington, we represent more than 34,000 members who recreate on public lands.

Many of our community members use and value State Parks' long-distance trails for activities including hiking, cycling, skiing and access to climbing areas. These are quiet, low-impact, human-powered activities and any consideration that would allow motorized use alongside our recreation is always of great concern to us.

We provided comments dated 25 September on the released criteria for developing a Parks policy and we are pleased to see that the draft policy clearly identifies non-motorized recreation as the primary use of linear trails, and that any motorized use must not significantly degrade this experience. We are also generally pleased with the draft General Principles, Other Requirements and the determination process for requesting a permit. However the policy is lacking detail in important areas that could significantly impact actual implementation. Accordingly we offer the follow items, as additions to our previous comments, which will clarify the policy:

- *Concern:*
The draft policy sets as a goal "removing barriers to efficient commerce," which is a significant expansion from the previous language which referred to allowing access for "limited agricultural use." We reaffirm our 25 September letter's statement that we are opposed to any use other than for agricultural production purposes. The draft policy, as written, would allow motorized access for any form of commercial activities on adjacent lands which could result in much higher levels, and extended seasons, of motorized use than would be the case if limited to agricultural access.
Recommendation:
Clarify that motorized access will only be allowed for agricultural purposes.
- *Concern:*
The draft policy does not make clear whether the permit is for an individual, a landowner as corporation, or a vehicle. It can be interpreted to allow an unlimited number of users as long as they are owners, employees, or agents of the adjacent property. This could result in multiple vehicles on the same section of trail simultaneously - a situation which was not envisioned originally and which would increase impact on users dramatically.

Recommendation:

Limit any permit issued to a single vehicle; transferrable between vehicles as long as driven by an adjacent land owner, employee, or registered agent. Operation of multiple vehicles simultaneously would require the purchase of multiple permits.

- *Concern:*

Unauthorized motorized use of linear trails would become more difficult to detect once a permit system is put in place. Requiring only that a permit be presented when requested to Parks personnel removes the opportunity for trail users to detect when unauthorized use may be occurring.

Recommendation:

A permittee should be provided with, and required to display, a windshield placard that clearly indicates the permit number and date of expiration. This provides at least some opportunity for trail users to assist in identifying abuse of the permit system.

- *Concern:*

The 14 day comment period for permits is too short a time for concerned individuals and groups to receive notice, learn about, and comment on a proposed permit.

Recommendation:

Extend the comment period to 30 days.

Thank you for the opportunity to provide input to the draft State Parks policy which would manage possible motorized use of your long-distance trails.

Best regards,

Joe Sambataro, Northwest Regional Director, Access Fund
Eddie Espinosa, Northwest Region Manager, American Alpine Club
Thomas O'Keefe, Pacific Northwest Stewardship Director, American Whitewater
Gus Bekker, President, El Sendero Backcountry Ski Club
Glenn Glover, Executive Director, Evergreen Mountain Bike Alliance
Martinique Grigg, Executive Director, The Mountaineers
Matt Perkins, Washington Climbers Coalition
Andrea Imler, Advocacy Director, Washington Trails Association