

Back Country Horsemen of Washington
Evergreen Mountain Bike Alliance
The Mountaineers
Washington Trails Association

December 23, 2015

Recreation and Conservation Funding Board
Recreation and Conservation Office
1111 Washington Street S.E.
Olympia, Washington 98501

Re: Proposed Policy Changes for Washington Wildlife and Recreation Program's Trails Category

Dear Recreation and Conservation Funding Board Members:

Thank you for the opportunity to comment on the proposed policy changes for the Washington Wildlife and Recreation Program's Trails Category.

Washington Trails Association, Back Country Horsemen of Washington, Evergreen Mountain Bike Alliance and The Mountaineers share a common interest in facilitating meaningful opportunities for all Washington residents to engage in outdoor recreation. Every year, our members contribute thousands of hours to ensure that existing trails are safe, sustainable and able to meet an ever-growing demand for new trails. We have a strong stake in creating opportunities that introduce a younger and more diverse group to the outdoors: they will be our future stewards and also represent communities most affected by lack of access to recreation opportunities.

The Washington Wildlife and Recreation Program (WWRP) is essential in providing outdoor recreation experiences that create healthy, economically vital communities. Since 1989, the successful implementation of the program has demonstrated a commitment to finding solutions that fulfill unique community needs, facilitate the participation of underserved populations and reflect the demonstrated intent of the legislature to fund trails that are so fundamental to accessing the state's great outdoors, whether that is on a mountain top or right in town.

1. Evaluation Criteria Change: Trails and Community Linkages

We support the proposed changes to the Trails and Community Linkages evaluation question.

In 2004 the Recreation and Conservation Funding Board (RCFB) followed staff recommendation to change the WWRP Trails evaluation criteria to combine evaluation questions for "Community Linkages" and "Trail Linkages." Currently the Trails and Community Linkages evaluation question is often literally interpreted and scored according to trail projects that serve as a literal means of transportation between two points. We appreciate that the "Linkages Between Trails" and "Linkages Between Communities" has been split into two questions with a clearer definition of the term "community" as it pertains to trail and their connection to a broadly interpreted definition of "community." In the past, this question has created a noticeable imbalance between hard surface and soft surface trail projects as typically hard surface trail projects provide a literal linkage between two communities, while soft surface trails may provide a literal linkage or they may provide a linkage to a community destination, such as a park or scenic overlook. This change should provide more balance between trail projects.

2. Evaluation Criteria Change: Project Design

We support the proposed changes to the Project Design evaluation question.

Currently, this criterion places a heavy emphasis on the accessibility of a proposed trail and an applicant's score often turns on that factor. Out of context, a hard surface trail is essentially more accessible and will always score higher than a soft-surface trail if the criterion is interpreted in this manner. But when assessing a community's need for a trail, context is inescapable. If a community has a pressing need for a soft-surface front country trail or connector, the accessibility of that trail can only be judged within the context of that need. When the legislature developed the guidelines, they intended for the accessibility of a trail to be judged depending on the nature and purpose of the trail and the corresponding need.

Although similar guidelines have not yet been developed for non-federal trails, the guidelines to ensure that federal trails comply with the Americans with Disabilities Act (ADA) illustrate a context-specific interpretation of accessibility. These guidelines provide exceptions for situations where terrain and other factors make compliance impracticable or where compliance would fundamentally alter a site's function or purpose. (Architectural Barriers Act Accessibility Guidelines; Outdoor Developed Areas).

We appreciate the rewording of this evaluation question to provide more specificity regarding accessibility design standards and guidelines that allow more flexibility for the intended purpose and use of the intended trail project.

3. Evaluation Criteria Change: Water Access, Views and Scenic Values

We have some questions with the proposed changes to the Water Access, Views and Scenic Values evaluation question.

In 2004 RCFB followed staff recommendation to change the WWRP Trails evaluation criteria to combine "Water Access and Views" with the "Scenic Values" evaluation question. The current criterion places undue emphasis on access to, or views of, water. Where the RCW instructs the board to consider the "water access, views, and scenic values" of the proposed trail, with no demonstrated preference, the criterion explicitly favors water access and water views: "Water access is the primary criterion; scenic values or views of water are secondary." This interpretation neglects the legislature's intent to consider other views and scenic values that are unrelated to a natural water body. Because this criterion is currently weighted at 10 points, the undue emphasis on water access and water views has a significant impact on the applications that receive funding and may outweigh other fundamental factors. Although water access and water views may indicate the greater desirability of an application if all other fundamental factors are equal, it should not be given greater weight than the other fundamental factors.

We are very pleased to see that the language "water access is the primary criterion; scenic values or views of water are secondary" has been removed from the evaluation question, which favored water access and created imbalance among projects.

However, we do question whether the intent to "reduce potential disadvantage for trails with no water access" is met with the change to split "Water Access" and "Scenic Values of the Site" into two questions that have separate point distributions. Please allow us to elaborate with two scenarios:

Scenario 1: Proposed trail project with zero water access and incredible scenic value.

If there is a proposed trail project that does not have any water access, we assume that project will receive zero points for the “Water Access” question. The same project has incredible scenic value, so it receives 10 points for “Scenic Values of the Site.” Total points received between the two questions is 10.

Scenario 2: Proposed trail project has ample water access and incredible scenic value.

If there is a proposed trail project that has ample water access, we assume that project will get 3 points for the “Water Access” question. The same project also has incredible scenic value, so it receives the maximum 10 points for “Scenic Values of the Site.” Total points received between the two questions is 13.

The result remains that trail projects without water access are still at a disadvantage simply because those projects do not go near water. Although water access and water views may indicate the greater desirability of an application if all other fundamental factors are equal, it should not be given greater weight than the other fundamental factors. Unfortunately greater weight is still provided to “Water Access” simply by being a question asked of grant applicants.

Conclusion

Washington state is blessed with some of the most iconic places to recreate in the country – if not the world. With hiking, biking and equestrian trails just steps away from the backyards of many communities, the quality of recreational experiences that we have are unparalleled and the reason that many seek to move here. Our trails are the way for people to access the natural world and have many benefits that also extend beyond recreation, including health, educational and economic values.

Our organizations believe that the proposed policy changes will go far in addressing the most pressing outdoor recreation needs of our communities, facilitate increased participation of underserved populations and reflect the demonstrated intent of the legislature to fund soft surface trails that are so vital to the enjoyment of the outdoors in our state. If these changes are implemented, it would be a positive step in ensuring the long-term stability and support of the Washington Wildlife and Recreation Program throughout the state.

We appreciate the opportunity to provide feedback on the proposed changes. Please do not hesitate to contact us if we can assist you or answer any questions.

Sincerely,

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