

USDA Forest Service  
Attn: Director, Recreation and Heritage Resources  
Mail Stop 1125  
1400 Independence Ave., SW  
Washington, D.C. 20250-0003

Dear Sirs,

We appreciate the opportunity to comment on the proposed interim directives, published as Forest Service Trail Accessibility Guidelines (FSTAG) and Forest Service Outdoor Recreation Access Guidelines (FSORAG). As members of the Appalachian Trail Conference Mid Atlantic Regional Partnership Committee (ATC MARPC), we feel that the proposed directives have considerable and significant implications for the thousands of volunteer trail workers we represent.

The Mid Atlantic Regional Partnership Committee is one of four such committees, formed under the auspices of the Appalachian Trail Conference (ATC) to accommodate a meaningful working relationship between our parent organization (the ATC) and the local trail maintaining clubs under its umbrella. Members in the MARPC are appointed by their local clubs, and are typically drawn from the leadership ranks of those organizations. The MARPC represents twelve maintaining clubs, active in the region that stretches from New York to central Virginia. In 2003, these maintaining clubs included approximately 22,620 members, managed in excess of 2,800 miles of hiking trails, and contributed 31,768 VIF/VIP hours to the management of the Appalachian Trail.

Our committee understands and applauds the proactive stance of the USDA Forest Service in its work to accommodate the widest possible variety of visitors to its facilities and, in particular, its efforts to enhance accessibility to disabled persons, to the greatest extent possible.

With regard to the proposed directives (and to the FSTAG directives, in particular), our committee has three basic concerns.

First, we believe that it is important that the documents under consideration be structured and presented in a way that acknowledges and accommodates volunteer participation in their implementation. While we understand that this acknowledgment need not be explicit in every detail, we feel that the sense of the guidelines should incorporate the role that volunteers will play in the construction and maintenance of trails and facilities covered under the proposed directives. Our specific concern is that the implementation of FSTAG directives will place additional demands (some untenable) on volunteer resources, and that these demands are neither discussed nor predicted in the FSTAG and FSORAG documents. In keeping with the Volunteers in the National Forests Act of 1972, and with the stated mission of the USDA Forest Service (with regard to volunteer participation), we feel that these impacts should be better described and that the language of the proposed directives be clarified to encourage understanding of this issue.

Second, our members feel that some hiking trails must continue to be maintained primarily for their wilderness esthetic, and that particular care must be taken, on the part

of Agency land managers, to prioritize this management goal. Our principal concern, of course, is the Appalachian Trail, which we feel may be vulnerable to over-interpretation of accessibility guidelines or a narrow reading of the *conditions of departure*, a likelihood that we feel is more probable as the directives are interpreted “in the field” and over time. While we do not believe that the preferred esthetic precludes broadened accessibility, we feel that the proposed directives tend to downplay this issue, in favor of language that presumes that resources will be considered accessible until proven otherwise. This may result, we feel, in inappropriate construction techniques and the placement of esthetically unappealing backcountry structures, in an effort to meet compliance guidelines under budget constraints.

Finally, our committee believes that it is unfortunate, particularly for volunteer trail managers but also for all users of Federally-owned recreational facilities (including, ironically, those requiring accessibility considerations), that the USDA Forest Service has proposed and published the FSTAG and FSORAG documents in the absence of coordination with other land managers and other Government agencies, concerned with similar management issues. As you know, the Appalachian Trail is managed as a unit of the National Park Service, but portions traverse land owned by a wide variety of State and Federal interests. While we anticipate that the FSTAG and FSORAG regulations may influence the directives proposed by these other interests (including the Architectural and Transportation Barriers Compliance Board), we feel it is unlikely that other regulations will be identical in either their broad design or specific details. This lack of coordination will require volunteers and others to respond to a variety of different management strategies, which will, again, tax the resources of those who wish to cooperate with the Forest Service in this endeavor. More important, it will force users of recreational facilities to familiarize themselves with the management strategies of the various Agencies, with the land ownership issues of adjacent trail sections, and with the types of facilities they can expect to encounter, based on these variables. Since all Federal Agencies are guided, in this work, by guidelines stipulated by the US Department of Justice and the Americans with Disabilities Act, our committee would prefer a more coordinated approach to the implementation of these guidelines.

The Appalachian Trail Conference has responded to the proposed interim guidelines, in a separate document, with greater regard to certain details of the FSTAG and FSORAG policies. Our committee has read and fully endorses this separate response.

We would like to thank you again for this opportunity to be part of this very important process.

Sincerely,

Kerry Snow  
Chair  
Mid Atlantic -  
Regional Partnership Committee  
Appalachian Trail Conference