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July 24, 2008

Bryant Watson, Executive Director
Vermont Association of Snow Travelers
26 VAST Lane
Barre, VT 05461

Dear Mr. Watson,

Thank you for the opportunity to comment on the Lamoille Valley Rail Trail (LVRT) Management Plan released June, 2008. The Northwest Regional Planning Commission (NRPC) acknowledges the time and effort that VAST has spent completing this plan.

The Northwest Regional Planning Commission's (NRPC) Transportation Advisory Committee (TAC) was pleased to note that VAST has heard their previous comments to clarify and broaden the membership in the Lamoille Valley Rail Trail Committee and to increase public outreach for the project. However, there are two main areas where the TAC would like to emphasize and add to their November 14, 2006 comments: ATV access and maintenance costs. The TAC would also like VAST and VTrans to reconsider the proposed phasing of trail construction.

There are several instances of contradictory policy found within the management plan in regards to ATV access on the LVRT. In *Section 8.0: Hours of Operation*, it is noted that ATV's are prohibited for recreational use while in *Section 5.0 Trail Uses*, it is stated that ATV access will be decided on a "case-by-case" basis by the State of Vermont. On February 26, 2008 the Federal Highway Administration (FWA) issued a memorandum clarifying that motorized vehicles (other than snowmobiles and vehicles exempt in 23 § U.S.C. 217) may not use federally funded non-motorized trails and pedestrian walkways except in exceptional circumstances. The memorandum explains that an exception "should be considered only when other reasonable options have been exhausted. The exception may allow limited use of segments of nonmotorized trails and pedestrian walkways, such as for 90 degree crossings, short doglegs, crossing structures such as bridges, or other exceptional circumstances." This memorandum should be referenced in *Section 5.0* and the FWA-compliant process for deciding these exceptions should be clearly outlined in management plan. As there are currently no ATV trails established along the LVRT, future ATV routes will need to take into account that the LVRT is not available for ATV use to access proposed trail networks.

The NRPC TAC has expressed concern about proposed maintenance of the LVRT. *Section 21: Maintenance* notes that “failure to plan, budget, and spend the necessary maintenance funding will result in a trail quickly reverting to the conditions present before this project began.” Even with this recognition, costs for these maintenance activities are not included in the management plan. *Appendix O: Trail Maintenance Schedule* lists potential maintenance activities and whether staff, volunteers, contractors or other groups will complete these tasks. VAST should consider how many total volunteer hours it can realistically expect and manage in a year and develop a budget based on this. Currently, volunteer labor is identified (either solely or in conjunction with VAST staff) for eleven of the 24 maintenance activities including bridge structural inspections, culvert inspection and fence repair.

While the NRPC TAC certainly supports broad partnerships and cooperation in developing and maintaining this resource as often as possible – it must be clearly and unequivocally understood that VAST bears sole responsibility for maintaining this resource as a four season multi-use trail. A successful management plan developed by the organization tasked with management of a public resource must include a more detailed explanation of anticipated uses and required maintenance.

The NRPC TAC strongly encourages that VAST construct a complete section of the trail in each region rather than to address all culverts, bridges, ditch issues along the entire length of the trail prior to adding an appropriate surface for pedestrian, bicyclists and wheelchairs. VAST has discussed that the federal appropriation and 20% local match will be spent on earlier phases of the project and additional funds will need to be found to complete the surface work. Even though VAST has retained fundraising expertise, it may be difficult to obtain adequate funds in these troubled economic times. If VAST is committed to a year-round multi-use recreation trail, it is critical that funding is available to construct a trail surface that is appropriate for all users, including bicycles, pedestrians, and individuals with disabilities. The NRPC TAC is aware that other groups have recommended that the trail be constructed in sections rather than the current proposed phasing and would like the opportunity to discuss this option further.

Thank you for the opportunity to comment. We look forward to reviewing your amended draft in the near future.

Sincerely,



Catherine Dimitruk
Executive Director