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**ENERGY FACILITY SITE EVALUATION COUNCIL
STATE OF WASHINGTON**

IN THE MATTER OF APPLICATION
NO. 96-1

OLYMPIC PIPE LINE COMPANY

CROSS CASCADE PIPE LINE
PROJECT

APPLICATION NO. 96-1

PREFILED TESTIMONY OF TIM
SCHMIDT

EXHIBIT _____ (TS-T)

ISSUE: IMPACTS TO
RECREATION USERS ON THE
JOHN WAYNE PIONEER TRAIL,
IMPACTS TO TRAIL STRUCTURE,
IMPACTS TO USER GROUPS
SPONSOR: WASHINGTON STATE
PARKS AND RECREATION
COMMISSION

Q. Please Provide your name business address to the Council

A. Tim Schmidt, Park Manager
Lake Easton State Park Area
PO Box 26
Easton, WA 98925
Phone: (509) 656-2586

Q. Please summarize your employment and educational background:

A. I am a 22-year employee of the Washington State Parks and Recreation Commission and have worked in numerous State Parks located in a variety of geographic areas of the state. Since 1985 I have been assigned to my present location at Lake Easton State Park where, among my other duties, I have been responsible for the management of the non-motorized John Wayne Pioneer Trail which is within Iron Horse State Park. I have a bachelor of Arts degree in Physical Education and Recreation from the University of Washington, graduating in 1976.

1 **Q. Generally, what is the subject of your testimony.**

2 A. I have managed Iron Horse State Park since its second year of operation. Therefore, I
3 have been an active participant in the facility planning, development and operation of the
4 John Wayne Pioneer Trail. I will use this experience to provide testimony describing the
5 park, the values the trail provides, how the trail is used, management of the trail and how
6 the weather affects this management, a description of the proposed pipeline route through
7 the park, concerns with emergency access in case of a pipeline failure, how the
8 construction of the pipeline will affect public use and our maintenance of the trail, and
9 suggested mitigation to offset these issues.

10
11 **Q. Please describe the John Wayne Pioneer Trail and Iron Horse State Park.**

12 A. Iron Horse State Park is a unique park in that, unlike traditional State parks, it is 109
13 miles long and averages 100 feet wide. The John Wayne Pioneer Trail is the 20 foot
14 abandoned railbed within Iron Horse State Park. In 1981, the State of Washington
15 purchased 212 miles of the abandoned railroad right-of-way which was a part of the
16 bankrupt Milwaukee Road railroad. This property began in Easton, Exit 70 off I-90,
17 ending in Tekoa on the Idaho/Washington border. It was purchased to provide the
18 backbone of a proposed cross-state recreational trail that would span the state from the
19 Pacific Ocean to the Idaho/Washington Border. Original management of the corridor was
20 assigned to the Washington State Department of Natural Resources (DNR). In 1984, the
21 legislature authorized the transfer of 25 miles of the right-of-way to State Parks. This
22 segment, Easton east to tunnel 47 (5 miles west of Thorp) became Iron Horse State Park
23 to be managed as a non-motorized trail. In 1989, another 48 miles were transferred from
24 DNR to State Parks from Tunnel 47 east to the Columbia River south of Vantage. Also
25 in that year, State Parks acquired 36 additional miles from Cabin Creek (three miles west
26 of Easton) through the Snoqualmie Pass, terminating at Cedar Falls (five miles south of

1 North Bend). Seven miles of this section is co-managed with the US Forest Service.
2 This brought the total length of the State Park-administered trail to 109 miles. The
3 remaining section of right-of-way east of the Columbia River remains under the
4 management of DNR.

5
6 The section of trail under my management begins at the western terminus at Cedar Falls.
7 A trailhead with parking, restrooms, and trail access to the John Wayne Pioneer,
8 Snoqualmie Valley, and Rattlesnake Ridge trails is planned for 1999. The trail starts in
9 lowland temperate forest of the Puget Sound Basin, (one of four ecologic zones that the
10 trail goes through), then gradually climbs in elevation along the valley walls above the
11 South Fork of the Snoqualmie River toward Snoqualmie Pass. Many of the high trestles
12 which offer views of the Cascade mountains are located along this section of trail. A
13 portion of the Humpback Creek Snowshed has been preserved as an example of the
14 wooden railroad snow avalanche structures that were once common on mountain
15 railroads in the United States. Two camping areas will be constructed in this section in
16 1999. Beside Cedar Falls, other access points to the trail are located at Twin Falls State
17 Park, and the USFS trail heads for Annette Lake and McClellan Butte.

18
19 At Snoqualmie Pass, the trail passes 1500 feet below the mountain ridges through the 2.3
20 mile long Snoqualmie Pass Tunnel. At Hyak the trail continues through subalpine forest
21 along Lake Keecheles and the Yakima River. This area is somewhat drier in the summer
22 with warm temperatures, and deep snow and cold temperatures in the winter. Two
23 camping areas are to be constructed in this section during 1999. A trailhead at Hyak with
24 parking, restroom and water provides access to the trail and Snoqualmie Pass Tunnel.
25 Other access to the section of trail going east is available at the Stampede Pass Road (no
26 improvements), and at Lake Easton State Park, which offers camping, parking, restrooms,

1 and water.

2

3 The trail within my administrative area continues east from Easton in the pine transitional
4 forest to the community of Thorp, which is located in the sagebrush ecologic zone. It
5 roughly follows the Yakima River through agricultural land, small communities and rural
6 housing developments. Access is provided at the Easton Trailhead, which offers parking,
7 water, and picnic sites; West Nelson Siding road (no improvements); Golf Course Road
8 (no improvements); Bullfrog Road (No Improvements); South Cle Elum which has
9 parking and restrooms, Lower Peoh Point (No Improvements); and Thorp for which
10 parking and restroom facilities will be constructed in 1999.

11

12 Presently there are two fiber optic cables within the trail, one belonging to WorldCom
13 and the other to AT&T. In 1989 AT&T buried its cable under the trail on average four
14 feet south of the centerline and four feet deep. WorldCom installed its cable in 1996-
15 97, buried on average four feet into the ground just south of the center line of the trail
16 tread.

17

18 **Q. For what values is the trail managed?**

19 A. The trail offers a variety of non-motorized recreational opportunities, active and passive.
20 Users can enjoy the gentle (less than 2 percent) grade, to bicycle, walk, hike, jog, cross-
21 country ski on groomed tracks, ride horses, enjoy horse-drawn wagons and pick various
22 berries that grow along the trail while taking in the quiet solitude of being in the
23 mountains, along the river's edge and in rural agricultural areas. Commonly seen wildlife
24 observed along the trail include bald eagles, hawks, deer, elk, black bear, small mammals,
25 and reptiles. The trail in many areas has become a major wildlife migration corridor.
26 The trail also offers the only access for fishing in many areas along the Yakima River in

1 the Cle Elum area. The Snoqualmie Pass Tunnel is the longest publicly used pedestrian
2 tunnel in the country.

3
4 **Q. How is the trail utilized by the public?**

5 A. The trail is used by an average of 100,000 people annually, with the section from Cedar
6 Falls to Easton accounting for 80% of that use. The Snoqualmie Pass Tunnel itself
7 averages 1,000 people per month, May through October. At present, the trail is used
8 mostly locally by people on day excursions. However, with the addition of campsites in
9 1999, we expect multiple night use to increase. The trail provides the public with the
10 opportunity to view eagles, elk, deer, reptiles, black bear, many small animals,
11 coniferous forests, and wild flowers, and the opportunity to fish in the Yakima River.
12 The “tunnel” has become the most popular and utilized area of the park. The tunnel is
13 unlighted and users enjoy the thrill, adventure, and uniqueness that it offers. Winter
14 recreation on groomed cross-country tracks along the John Wayne Pioneer Trail offers
15 thousands of skiers the opportunity to enjoy the solitude the trail offers. Six weekends
16 during the winter, a blind ski program offers up to 80 people the opportunity to cross-
17 country ski the trail along Lake Keechelus. At Deception Craigs near exit 38 off I-90,
18 sport rock climbers use the State Parks-designated climbing area which is published and
19 known nationally. Under Special Use Permits, local fire and search units use the rocks
20 and large structures for training their members for rescue operations. Each May hundreds
21 of people join the John Wayne Pioneer Wagon and Riders Association on its annual
22 (1999 will be the 16th year) Cross-State equestrian ride from Easton to Tekoa. A
23 mountain bike rental business offers guided and non-guided tours of Iron Horse in the
24 Snoqualmie Pass to Cedar Falls area. They will arrange pickup of the renter and bicycles
25 at the end of their ride and transport them back to their cars. Another business offers
26 horse-drawn wagon and sleigh rides on the trail in the Easton area. Both of these

1 businesses rely on the trail and serve hundreds of users per year.

2

3 **Q. How does State Parks maintain those portions of the trail under your management?**

4 A. Management of Iron Horse State Park within my assigned area includes maintenance of
5 the trail. Presently, I have two full time Rangers, two full time maintenance workers and
6 three seasonal personnel to provide the oversight and maintenance of the trail. Typical
7 tasks include meeting our legal requirement to control noxious weeds; maintaining and
8 replacing culverts and ditches; replacing, grading, and compacting the trail tread;
9 brushing trail edges; cleaning and maintaining restrooms, trail heads and equipment;
10 patrolling and providing information to park users. In order to accomplish these tasks, we
11 use trucks, dump trucks, excavators, brush mowers, spray equipment, a large front loader,
12 bulldozer, and grader, and numerous pieces of small equipment.

13

14 Maintenance access is provided at the trail heads and road crossings located at Cedar
15 Falls, Twin Falls State Park, Garcia road, Hyak, Stampede Pass road, Easton State Park,
16 Easton trail head, West Nelson Siding road, Golf Course road, Bullfrog road, South Cle
17 Elum, Lower Peoh Point road, Tanum road, and Thorp Highway. During winter months
18 access is limited due to the depth of snow. This includes all of the accesses except Cedar
19 Falls, Twin Falls, and Thorp.

20

21 Park staff perform routine maintenance tasks on sections of the trail on an annual
22 rotation. This schedule may include: maintaining the average 20' wide trail tread by
23 grading; including clearing ditches and providing a center crown; brushing trail edges
24 with powered equipment and hand trimming; clearing earth slides and restoring the trail;
25 inspecting major drainage facilities, culverts, flumes, and bridges for damage and
26 blockages; installing gates and signs; cleaning restrooms and maintaining the trail heads.

1 During the winter, November through March, staff operates a snowcat, setting cross-
2 country ski tracks from Hyak east to Stampede Pass. During March through October,
3 park staff use powered and hand spray equipment to control noxious weeds, mainly from
4 Hyak to Thorp. Hundreds of man-hours are spent each year to accomplish this legally
5 mandated task.

6
7 **Q. How does the winter weather affect your management of the trail?**

8 A. The area from Garcia to Thorp is not accessible by normal vehicle during the winter
9 months. Snow usually falls in November in the pass area and remains on the ground until
10 late April. Up to 10 feet may be on the trail in the Hyak to Stampede area. I have
11 attached as exhibits to my testimony several pictures showing snow conditions on the
12 trail. (See Exhibit TS-1: USFS information board located at Keechelus Lake Boat launch
13 parking area adjacent to Iron Horse. Exhibit TS-2: Information board at the entrance of
14 the Snoqualmie Pass Tunnel. Exhibit TS-3: Stampede Pass road crossing, 7-foot pole
15 pushed through the snow along the trail. Exhibit TS-4: shows the pole length. The staff
16 member is 6'6" tall).

17
18 The Snoqualmie Pass Tunnel is closed from November 1 to May 1. This is due to ice that
19 builds up on the ceiling (several hundred pounds) and floor making it hazardous for
20 anyone to enter. Several exhibits to my testimony show winter conditions at the tunnel.
21 (Exhibit TS-5: 200 feet east of the Snoqualmie Pass Tunnel. Exhibit TS-6: East portal of
22 the Snoqualmie Pass Tunnel, gates are snowed and frozen closed. Exhibit TS-7: Ice on
23 the floor of the Snoqualmie Pass Tunnel which is 6" thick. Due to the warm winter this
24 year, there has not been much ice buildup on the ceiling; however, note the large pieces
25 lying on the floor that have fallen down during the winter. Some of these weigh a
26 hundred pounds or more.)

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The trail passes through an active avalanche area along Lake Keechelus. Park staff uses a snowcat groomer to remove the snow in order to maintain access for park operations and public access. (See Exhibit TS-8: sign cautioning users of the avalanche area . Exhibit TS-9: Snowcat clearing snow slide along Lake Keechelus.) In order to accomplish any major task along this section impacted by snow, the snow has to be removed from the trail, which causes extreme damage to the surfacing and drainage facilities, and limits the winter recreation program which affects over 70,000 people. WorldCom installed its fiber optic cable along Lake Keechelus during the winter, removing the snow from the trail tread. Company operations included much of the trail surface, which ended up in the drainage ditches. For this reason, we do not do any routine maintenance on the trail during the winter. All access to the trail during the winter has to be on snowmobile or in snowcats, and there are times during heavy storms that even these cannot access areas of the trail.

Q. Are you familiar with the proposal by the Applicant in this proceeding, Olympic Pipe Line Company, to construct a petroleum pipeline along portions of the trail?

A. Yes. I attended the first informational public meeting that the Olympic Pipe Line Company held in the Cle Elum area. I have also met with representatives of OPL, as a member of the “agency team” at meetings with State Parks. I was flown over the route by OPL in 1997. I have had the opportunity to review and comment on EFSEC’s Draft Environmental Impact Statement for the Cross Cascade Pipeline, and OPL’s application for an easement through State Parks property.

Q. Please provide a description of the proposed route along the trail.

A. The proposed route of the pipeline on Iron Horse State Park is from where the pipeline

1 crosses Twin Falls and comes onto the trail (approximately section 30, T23N, R09E).
2 The pipeline would travel east to the trailhead for Iron Horse and Twin Falls State Parks
3 at Exit 38 off I-90 (SE corner of section 29, T23N, R09E), leaves State Parks property at
4 exit 38 off I-90, re-enters at the Garcia USFS road #9020 access (NW corner of SEC 02,
5 T22N, R09E), then travels along the trail paralleling the fiber optic cables to
6 approximately the NE corner of section 1, T22N, R09E where it leaves the trail. The
7 pipeline reenters the trail just west of the Snoqualmie Pass Tunnel, again parallels the
8 fiber optic cables, and continues on State Parks property to the community of Cabin
9 Creek, which is 3 miles west of Easton.

10
11 **Q. Do you have any concerns with respect to the trail accessibility in the event of a spill**
12 **or other emergency situation?**

13 A. The trail is accessible during the late spring through late fall for response to any
14 emergency. Due to the public recreation along the trail, OPL will have to keep the park
15 staff informed of any pipeline emergency that may occur. This will facilitate the closure
16 of a section of the trail for the safety and well-being of the trail users. Parks Staff may be
17 the only enforcement agency that can quickly respond, and will need to be trained in
18 initial oil spill response. In the winter, the trail from Garcia to Cabin Creek is not
19 accessible by normal vehicle due to up to 10 feet of snow. The only way to access this
20 area is by snowcat or snowmobile, and if wheeled vehicles must be moved into the area,
21 the snow will have to be plowed off. This would result in the damage mentioned above
22 and severely impact (depending on the time of year, could end the season) the winter
23 recreation on the trail. Compaction by the cross-country ski grooming makes the removal
24 of the snow almost impossible. I have serious concerns about how OPL would respond
25 and with what equipment.

26 **Q. Do you believe that the construction of the pipeline, as proposed, would impact the**

1 **trail or the public's recreational use of it?**

2 A. Construction of the pipeline will greatly impact the accessibility to the trail by the public
3 during the time it takes to complete the project. OPL proposes to limit public closures
4 within the construction area to one hour (page F-2 of OPL's request for easement). With
5 what I observed with AT&T and WorldCom during their construction on the trail, this
6 will not be possible. WorldCom contractors had the entire trail width filled with
7 equipment, especially in the rock cuts where there are no detour routes available for trail
8 users. The decision was made quickly to close entire sections of the trail (i.e., Garcia to
9 Hyak, Hyak to Stampede pass road, Stampede Pass Road to Cabin Creek). This allowed
10 for better public notification and signing, but also closed those sections for longer
11 periods of time. During construction, there will be increased traffic by construction
12 vehicles/equipment using the access point along the trail. Within the 30 foot construction
13 zone, vegetation will be destroyed, and the trail surface disrupted. I personally, and the
14 agency staff, received numerous complaints from users who were denied access during
15 the WorldCom construction, and were annoyed with the increased traffic on the trail.
16 Users did not want to wait to pass. The noise and torn-up trail tread are further deterrents
17 to public use.

18
19 OPL, on page I-1, of its easement application, requests a 30 foot construction right-of-
20 way. The trail tread is on average 20 feet wide, and in some of the rock cuts narrower
21 than that. This leaves only 10 feet at best to store equipment, materials, allow turn-a-
22 around areas, and to stockpile ditch spoils. WorldCom, which used a much less invasive
23 construction technique, found it needed up to 70 feet to accommodate construction
24 operations. The turn-a-rounds themselves took up the entire 50 feet of the right of way
25 north of the centerline. OPL will need more than the 30 foot construction easement it's
26 requesting. In all of these disturbed areas, the plant life was destroyed. OPL projects a

1 two year grow-back period for the native plant life to return. If these disturbed areas are
2 not immediately replanted, noxious weeds will become established, crowding out the
3 native plants.

4
5 WorldCom contractors also found many places with harder rock than they anticipated,
6 which severely slowed down the pace of construction. In many areas that OPL proposes
7 to install its pipeline, the trail subgrade is made up of fill which contains very large
8 boulders. WorldCom and AT&T found it necessary to remove many of these, which
9 resulted in larger excavations, loss of volume within the trail, lowering of the trail grade,
10 and subsequent drainage failures. On page L-1 of OPL's easement application, OPL
11 projects to maintain a 2,000 foot-per-day pipe installation rate. Due to the experiences I
12 observed with AT&T and WorldCom, I do not have confidence that OPL will meet this
13 projection.

14
15 As was mentioned earlier, there are two commercial businesses that have valid
16 Commercial Use Permits from State Parks that use the trail as one of their primary
17 locations to provide a service and make a living. During the WorldCom construction,
18 these businesses had to shut down, which resulted in a substantial reduction in their
19 earning. Construction in Iron Horse by OPL will again displace them and the people that
20 they serve.

21
22 Another user population that will be affected during construction are those with
23 organized recreation activities that, in some instances, annually use the trail. These
24 include the annual cross-state trail ride, boy scout groups and walking groups that
25 request and receive a Special Use Permit. Some of these activities are planned a year in
26 advance. During periods of annual or special use activities by groups under Special Use

1 Permits, the presence of equipment, impacts by noise and dust, vehicles, blockages, and
2 restoration may lead to loss of this recreational opportunity and discourage their future
3 use. This user population includes important support groups and constituents who
4 assisted with the establishment of Iron Horse State Park.

5
6 The Snoqualmie Pass Tunnel offers a much larger challenge. It has historical as well as
7 unique recreational value. WorldCom spent over a month installing its cable and 11
8 months restoring the tread to State Park standards. During this time the tunnel was closed
9 to public use. OPL proposes to remove the tread material and stockpile it along the south
10 wall of the tunnel. This was tried by WorldCom and, due to the very limited work space
11 and possible damage to the drainage scuppers, it abandoned this methodology. Instead,
12 the company plowed and rock-sawed the cable in. This caused the surface material to
13 become contaminated with large bedrock, not suitable for the trail tread. Therefore, OPL
14 will find the same problem, if not bigger, due to the larger trench excavation, with
15 contaminants in the surface material if they plan to reuse it. The drainage scuppers are
16 fragile and prone to damage by equipment. The concrete lip that holds the wooden
17 boards that cover the drainage scuppers are easily damaged by equipment driving over,
18 and material stored upon them. The extent of the damage caused by construction to the
19 scuppers may not be visible. This becomes a safety concern after the construction is
20 completed and the public is able to use the tunnel again. Again, I feel that the time frame
21 that OPL has set for the completion of the tunnel work is unreasonable and that OPL's
22 plan to keep the tunnel open during construction will be unsafe and hazardous to the
23 public.

24
25 Both, AT&T and WorldCom cables were plowed into the trail using large "Cat" type
26 equipment with plows attached to the rear. Even with this type of installation, the trail

1 was totally impassable for long periods of time as hard rock near the surface was cut
2 through. In many of these areas, the trail had to be entirely reconstructed, including in
3 Snoqualmie Pass Tunnel. OPL's construction methodology, set forth in pages L-1 thru
4 L16 of its easement application, outlines a much more invasive construction technique
5 then AT&T or WorldCom used. More areas of the trail will have to be totally
6 reconstructed to State Parks standards upon completion of installation before the public
7 will be able to use the trail.
8

9 **Q. Are there mitigations that Olympic Pipeline can or should be required to undertake**
10 **to eliminate these construction impacts?**

11 A. The following are the minimum obligations that should be imposed on OPL to mitigate
12 the impact of construction to the trail:

- 13 1. In order to reduce impact to trail users, construction should proceed one section at
14 a time (as outlined above), with total completion of each section, including
15 restoration of the tread (grade, fill, and compact), replacement of signs and
16 markers, and replacement and repair of culverts, before the contractor is able to
17 move on. This will allow the total opening of sections of the trail to the public
18 with limited need for the contractor to return and further impact the users.
- 19 2. To lessen the visual impact, OPL needs to aggressively replant native plants
20 (hydro-seed using wildflowers/grass seeds; and plant woody native shrubs/vines),
21 and agree to fertilize the disturbed areas and control noxious weeds over a
22 multiple year time frame.
- 23 3. To eliminate the impact to the users, all reconstruction of the trail should be up to
24 State Parks standards and be completed immediately upon installation of the
25 pipeline. Sections of the trail should be totally restored before construction can
26 begin in another section.

- 1 4. In the tunnel, all of the surface and subgrade base material has to be removed from
2 the tunnel. This material can be used as subgrade fill. All new 5/8" crushed rock
3 to a 6" depth should be placed as top course, graded with a minimum 2" crown,
4 and compacted.
- 5 5. OPL should be required to replace the scuppers as part of the long term
6 mitigation.
- 7 6. To eliminate any visual or safety issues, any above ground inspection and
8 maintenance facilities should not be placed within the tunnel.
- 9 7. To reduce the visual impact, all signing for the pipeline should be placed on
10 existing AT&T/WorldCom marker poles.
- 11 8. We cannot mitigate the loss of revenue by the businesses that rely on the trail. Nor
12 can we mitigate the loss of use support by organized groups. However, OPL
13 should be required to work with the parks staff to minimize loss of use/business
14 and coordinate construction during times these activities are present.

15
16 **Q. Will ongoing maintenance of the pipeline, as proposed by OPL, impact the trail, or**
17 **the public's recreational use of it?**

18 A. The addition of another utility will impact the operation and maintenance of the trail for
19 recreation. Besides the initial impacts due to the construction, such as plant recovery and
20 trail restoration as mentioned above, I am also concerned about the increased vehicle
21 traffic (noise, dust, safety and impact to the trail tread), disturbance of the tread for
22 routine inspection/maintenance of the pipeline, and the distribution of additional gate
23 keys that will further reduce the trail security. Also, another utility further limits park
24 staff's ability to maintain the trail. During the winter, most of the pipeline within Iron
25 Horse will not be accessible to normal vehicles due to the snow. Any snowcats,
26 snowmobiles, and other equipment operating on the trail will severely disrupt the

1 snowmobile and cross country grooming that is provided for recreationists. AT&T and
2 WorldCom limit their activity and access from Garcia to Easton during the winter
3 months. The DEIS states that OPL requires on-site inspections of the pipeline a
4 minimum of once per week, but it does not indicate how this is to be accomplished during
5 the five months snow is on the trail. Can OPL limit its activity on the trail, yet still
6 insure the pipeline is adequately inspected during the four to five winter months?
7

8 The same issues stated in the previous responses concerning impacts to businesses and
9 special uses apply here. Many of the special use groups have been long-time supporters
10 of the trail and were instrumental in the initial concept of a cross-state trail, we cannot
11 afford to further impact their recreational activities.
12

13 **Q. Are there mitigations that Olympic Pipeline can or should be required to undertake**
14 **to eliminate these maintenance impacts?**

15 A. To mitigate the impacts caused by OPL's maintenance of the pipeline within Iron Horse
16 State Park, OPL should be required to:

- 17 1. Schedule inspections for early in the morning mid week during spring,
18 summer and fall to lessen the impacts of vehicles on the trail users.
- 19 2. Parks staff and the other two utilities are the only entities that would be
20 doing work along the trail with the exception of Hyak, Cabin Creek and
21 any road crossings. This should lessen the need for signing the pipeline, to
22 a line-of- sight standard.
- 23 3. Routine open trench inspections cannot be done in the winter. They
24 should be scheduled in late spring and late fall when user traffic is
25 reduced.
- 26 4. OPL needs to develop an emergency recreation plan which includes plans

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to notify staff and public, list contact names/phone numbers, response plan, and provides for long term closures

5. OPL needs to provide parks staff with initial oil spill training and materials.

6. Again, we cannot mitigate the loss/erosion of park support or revenue by the businesses that rely on Iron Horse. However, OPL needs to coordinate with Parks staff to restrict/postpone maintenance during group Special Use activities and activities by the businesses that hold State Park Commercial Use Permits.

DATED this _____ day of February, 1999.

TIM SCHMIDT