



Janet Zeller

09/22/00 08:36 AM

To: Vicki Jowise/R5/USDAFS@FSNOTES, Lynn
Boone/R5/USDAFS@FSNOTES
cc: Beth A Paulson/R5/USDAFS@FSNOTES, Lester
Lubetkin/R5/USDAFS@FSNOTES, Judy
Yandoh/R5/USDAFS@FSNOTES, Janice
Gordon/R5/USDAFS@FSNOTES
Subject: Re: New accessibility guidelines

Vicki, Thank you for sharing your well stated concerns. Please understand the interim direction to follow the Proposed Access Guidelines for Outdoor Developed Recreation Areas was intended to clarify the source for the technical specifications as well as the source for the **minimum** scoping requirements-- placement of those provisions. The Forest Service has always taken the position reflected in the Region 5 Strategy that we do not build to minimums -- the desired level of accessibility is 100% for both the site and the site furnishings. In the campground setting the only basis for precluding that level of accessibility would be the terrain and/or soil type that may not for example permit the installation of outdoor recreation access routes at the ideal gradient, etc. throughout the entire campground without fundamentally changing the experience (ROS).

The Forest Service will be further refining this direction during FY 2001 through revision to the 2330 FSH and FSM and policy development. I understand you are in a difficult immediate position and that longer term help doesn't serve you at this moment. As the Interim National Accessibility Program Manager I urge you to stay firmly within the R5 Strategy using the proposed guidelines for technical guidance, stay with the 100% of campground furnishings and the highest level of accessibility possible within the constraints of the natural setting. The forthcoming guidelines will clearly articulate this long held position of the agency.

If I can be of any further assistance, please let me know.

Janet A. Zeller
R9 Civil Rights/Program Delivery Manager
and Interim National Program Manager for Accessibility

Phone: (603) 528-8751

Vicki Jowise



Vicki Jowise

09/20/00 04:16 PM

To: Janet Zeller/R9/USDAFS@FSNOTES, Lynn
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Subject: New accessibility guidelines

I'm the forest landscape architect on the Eldorado N.F. in region 5. I am currently reviewing the recreation 4(e) conditions for a FERC relicensing project. Our previous forest landscape architect (he retired last January) did a great job of creating detailed proposals for developed recreation site rehab projects for 5 of our sites within the project boundary based on the Region 5 Universal Access Strategy. In that strategy the Forest Service goal is to "make accessible at the Moderate Access Level (Roaded Natural) 2 or 20% of campsites whichever is greater; the desired level being 100% given the nature of the terrain". He determined that at two of the campgrounds the terrain lent itself to allowing moderate accessibility at 100% of the campsites.

The licensee's recreation representative has brought to our attention that the Forest Service policy has changed since submittals of our 1999 Action Plans per Dennis Bschor's Interim Policy, April 19, 2000. According to the letter, we should be following the Proposed Access Board guidelines for new facility construction and alterations to existing facilities. I have just received and reviewed these guidelines and have two concerns needing clarification in order to proceed with our 4(e) conditions:

(1) Maintenance vs. alteration seems to be addressed from a trails standpoint only. Are the definitions intended to relate to campground and picnic area facilities also? If so, it appears that we can't require the licensee to make any improvements for accessibility since our intent was for the work to take care of deferred maintenance (and accessibility) and (in two sites) to upgrade the development scale. The requested changes will not change the original purpose, intent or design of the facility.

(2) The previous R5 strategy stated that any time we replaced campground furnishings (i.e. tables, grills, firepits), they **all** had to be made accessible. In addition, the desired goal was to have 100% of all sites (given conducive terrain) be made accessible. The interim policy states that campground furnishings need only be accessible if the individual campsite is accessible and the maximum campsites required to be accessible is derived from a table. In the case of our two campgrounds this would change the requirement from 10 out of 10 sites to 2 out of 10 sites.

Obviously our Licensee wishes to do the least amount of investment as possible. This new policy is very different from what we have been working toward for the last few years. Can you please give me some direction to ensure I am meeting the appropriate forest service direction and at the same time giving the licensee 4(e) conditions that are backed by official policy. Unfortunately this realization of possible conflicts has come very late in our process. It is assumed that the NEPA work will be completed within the next few months. If you can get back to me as soon as possible, I would greatly appreciate it.

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