

STATE OF VERMONT

SUPERIOR COURT
Orange Unit

CIVIL DIVISION
Docket No. 23-CV-00195

John Echeverria & Carin Pratt, Plaintiffs,

v.

The Town of Tunbridge, Defendant.

AFFIDAVIT OF REBECCA WASHBURN

I, Rebecca Washburn, being duly sworn, hereby state:

1. I am the Director of the Lands Administration and Recreation Division of the Vermont Department of Forests, Parks and Recreation (Department), and have served in that role since 2018.
2. I am familiar with municipal legal trails and their importance to the Department.
3. Legal trails may be viewed on interactive maps at multiple digital locations including <https://vcgi.vermont.gov/maps>. The State of Vermont Agency of Transportation (AOT) generates and maintains these maps. All road segments are attributed by AOT class. The total distance of legal trails in Vermont can be calculated by a layperson by summing the lengths of all segments labeled as legal trails. The total distance of legal trails in Vermont according to the GIS is 543.9 miles.
4. In 2009, the Department provided State grant funding through its Recreational Trails Program totaling \$20,000 to the Town of Marshfield to improve Thompson Road, which is part class 4 highway and part legal trail. This funding supported clearing, ditching, grading, graveling, and reseeding, as well as gates to prevent unauthorized

motor vehicle use. Exhibit ____ is a true and accurate copy of the agreement between FPR and the Town of Marshfield for this grant.

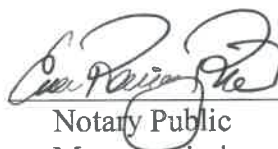
5. The Department administers the federal Recreational Trails Grant Program for Vermont and offers grants to municipalities and non-profits. The Department considers the maintenance and repair of legal trails to be eligible for funding under the Recreational Trails Program.
6. A total of 75 different legal trails in Vermont provide access to lands owned by the State or over which the State has easement rights.
7. Data released by U.S. Department of Commerce's Bureau of Economic Analysis shows that in 2022, outdoor recreation made up 4.6% of Vermont's economy ranking the state 2nd behind Hawaii in contributions to state gross domestic product. Vermont ranked 3rd in 2021. This data is available at <https://www.bea.gov/news/2023/outdoor-recreation-satellite-account-us-and-states-2022>.
8. The foregoing is true and accurate to the best of my personal knowledge and belief.

Dated this 13th day of November, 2024, at MONTPELIER, Vermont.



Rebecca Washburn

Sworn and subscribed before me,



Notary Public

My commission expires: 1-31-25

