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**To:** [Linford, Tera](#)  
**Subject:** FW: comment on proposed changes to CrRLJ 7.6  
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**From:** Eric Mapes [mailto:EMapes@co.whatcom.wa.us]  
**Sent:** Friday, April 22, 2022 5:11 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** comment on proposed changes to CrRLJ 7.6

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Dear Supreme Court Rules Committee,

The Interstate Compact on Adult Offender Supervision provides for a process for people on probation for certain types of crimes to have their supervision transferred to another state. This allows people whose family or employment situation requires them to relocate to do so without violating the terms of their probation. The existing court rules, however, provide no similar process for people to have their supervision transferred from one county to another within Washington State. The proposed amendment would fill that gap.

Having practiced criminal defense for many years in Chelan County, I saw firsthand the need for this change. That county is relatively remote from the state's major population centers, and separated from many of them by mountain passes that are often impassable in winter. It has many recreational opportunities popular with tourists, including a number where alcohol consumption is encouraged, such as the Leavenworth Oktoberfest and the numerous wineries around Lake Chelan. This results in a large number of people from outside the county being charged with alcohol-related offenses. Terms of probation for such offenses often include a requirement for regular, in-person meetings with a probation officer, so as to allow for random testing of breath or urine.

Particularly for low-income people, who struggle to afford basic necessities, it is simply not feasible to take time away from work or family responsibilities to travel several hours over one or more mountain passes on a regular basis to comply with such conditions. This problem is exacerbated when someone has lost his or her driver's license, a common result of alcohol-related driving offenses. This conundrum can cause people to simply give up even trying to comply with probation, ultimately reducing their engagement with treatment and leading to incarceration, loss of employment and housing, and worse.

This commonsense amendment will provide a path for people to transfer their supervision to the county they actually live in. This will not only make it more feasible to comply with the conditions of probation, but will engender respect for the law. It simply does not make sense that people can obtain a transfer of supervision from Clark County, Washington, to Multnomah County, Oregon, via the ICAOS, but cannot obtain a transfer within Washington from Walla Walla County to Whatcom County.

I encourage you to adopt the proposed amendment. Thank you for considering my thoughts.

Eric Mapes WSBA no. 45509  
Whatcom County Public Defender  
215 N. Commercial Street, Bellingham, WA 98225  
Ph. (360) 778-5640 | Fax (360) 778-5641  
(he/him/his)