

April 2010

Washington's Scenic and Recreational Highways Plan

Public Questions and Concerns Received by WSDOT during 60 day comment period and public meetings

*Note: WSDOT is currently working to address comments

Public Hearing Questions and Comments on DRAFT Scenic and Recreational Highways Plan
What will you do with the Resource Planning Index now that you have compiled all this data together? Will grants be ranked based on this Index or other performance measures? I start to get concerned about performance measures and how they would be applied to Scenic Byways projects.
The piece of State Highway around Willapa Bay is unique and important, but it isn't identified in the Corridor Management Plan. There is no one there. It is a unique place, but the Scenic Byways are about bringing people in to show them [travelers] what you have.
These little rural communities are not looking for big development. They are just looking for the better signing and websites. Some of these pristine areas do need stewardship, but there is no community there to pull together and do a corridor management plan.
As you said, it can not be up to one agency to meet these goals. It has to be a partnership. Local Byway groups can't do a lot of these projects without partnerships.
It is a good model to have the RTPOs involved in the local byway group plans.
I like how you have handled the project list in the Plan because it really shows that it is more than fog line to fog line. This is economic development for us and we are new at it but we are working on it.
Overall I think you did a good job and a good job of dispelling some of the fear out there. It is nice and succinct. I would really encourage you to hand out the Frequently Asked Questions piece at the MPO/RTPO meeting coming up.
I was never really clear about where the fear of de-designation came from. That is still a fear out there with people I work with on the tribal side. So do the Legislators use this plan to make decisions? I hope to help those folks understand that de-designation is not going to happen. At tomorrow's TTPO meeting it may be a good opportunity to re-state this message.
There is a disconnect between what local byway groups do and the role of the state.
Everything is about outcome based reporting and so why would WSDOT be any different.
I think the performance measures are very ambitious, especially the development review. Does WSDOT review developments in the area of Scenic and Recreational Highways or everywhere?
WSDOT should address the most at risk and most endangered natural and scenic areas and put more emphasis on stewardship. I am not concerned with tourism promotion in my area.
I am a local byway contact and I was really discouraged from participating in this process when I saw all those angry emails from [Person's Name Deleted]. Who is she – why is she so angry? I thought that I must not understand what was going on, so I didn't participate. But – I wanted to come tonight and hear the discussion.
WSDOT should take an active role in reviewing local EISs and development review near these pristine natural areas
We need access management on scenic and recreational highways and byways.
Bicycle and pedestrian projects should be a bigger part of this program.
The four page question and answer sheet is helpful and answers a lot of questions.
I like the connection between comprehensive plans and corridor management plans.

Public Hearing Comments and Questions on DRAFT Scenic and Recreational Highways Plan
Will this be part of the WTP? Is it a 20 year Plan? Will it be updated regularly? Does it contain specific projects?
I need to understand developing priorities vs. prioritizing byways and projects in the Plan? How does that work?
Does this plan effect specific WSDOT policies for example using a different type of guardrail on scenic byways or highways or design standards?
How many corridor plans do we have and what does plan integration look like?
What kind of examples would you give of "Stewardship" projects or projects that meet the Environmental goal?
Did you get any feedback from the local byway groups about the Resource Planning Index? I know that there was quite a bit of concern about inaccuracies. I can't tell you what those inaccuracies are, but I know there was quite a bit of concern. I will convey back to the group that they need to provide comments to WSDOT. I will email the group and tell them to provide feedback.
I thought all of SR 20 was a Scenic and Recreational Highway?
As I understand it, there are no Scenic Byways listed in the law by name. Correct me if I am wrong, in order to be a Scenic Byway you need to be a Scenic and Recreational Highway in the State law.
The federal grant program came out and there were guidelines on how a local group could organize and get grants. So, there were a lot of groups that were interested in sharing their byway with others and they organized to pursue those funds.
Is the whole Cascade Loop designated as a Scenic and Recreational Highway in the state law? I want to add to the record that all the gaps should be added to the law, addressed.
I do want to talk about the Bill [621 1] in the state legislature right now that would add an agricultural byway to the law. I noticed that there was a specific requirement for signage. Doesn't that have to go through WSDOT to get in the law? So, would WSDOT have to address the signage requirement? Along the Cascade Loop there are certainly a number of agricultural routes. Can you let me know if WSDOT will have to provide signage?
Do you have a good supply of the Byway Maps? We would like to get some of those from you.
It was clear to me in the conference call discussion that the grants would indeed be prioritized by you, your office, this year [?] Does the state DOT submit your own grant applications through this program? I think there is a need to consolidate signage throughout the state. I think there is a need for a statewide sign project that would do that.
So, back to the gaps [sections state highway that are not identified in state law as Scenic and Recreational Highways], how do we get those addressed? We talked about this with the Steering Committee several times.
Why are these gaps? Are they gaps in the law?
90% of the Cascade Loop is a Scenic and Recreational Highway.

Public Hearing Comments and Questions on DRAFT Scenic and Recreational Highways Plan

It is really up to local groups to make something out of the Scenic and Recreational Highway designation in state law.

The majority of the scenic byway groups are volunteers.

The role that Regional Transportation Planning Organizations play is something that is probably not well known to local groups because a lot of these groups are volunteers. They don't have a lot of time to go to these types of meetings.

These Byway projects are very difficult for our WSDOT Region Offices, not any criticism of the volunteer groups, but they don't have engineering staff like the local agencies and other organizations typically. They may not be familiar with the federal requirements. Most people don't understand that you can't hire your neighbor, cousin or brother even for a small sign project. There are processes that we have to follow.

What are all the funding sources that could be used for byway projects?

Someone told me there were some concerns about carbon footprint and VMT from these projects?

Tourism in general is better than other types of travel in terms of VMT and green house gas because there are more people in the car on tourism trips.

A visitor has less impact on carbon footprint than people living here in the state.

We are doing a Chelan county survey, but I will have to look to see if includes this type of information.

I am always fearful that they are going to levy some sort of regulation on us that will stop us from developing.

Why is the DOT wasting taxpayer money on this initiative in such tight economic times? This is a feel good project that would be fine when times are good, but with severe budget shortfalls in this state, projects like this should be suspended. Many roads in this state are in very poor condition, and the money would be better served to go to fixing those. I understand that the federal government is pitching in, but that is not a good reason to spend Washington's money on a feel good project. The federal government should re-evaluate their spending of money on these kinds of projects as well, until it can balance it's budget.

Scenic and Recreations Hwys plan should adopt stricter standards for signage in these scenic corridors. For instance: off site signs should be prohibited - sandwich signboards and other commercial advertisements; and - the back side of directional, traffic and informational signs should be painted non-reflective brown so they do not stand out and impact corridor viewsheds.

Public Comments on DRAFT Scenic and Recreational Highways Plan

As one who has spent 60+ years exploring most of the by-ways of Washington, I'm pretty familiar with the entire state. The Scenic Highways program is a great concept to preserve, enhance, and promote some of our most interesting public roadways. Kudos!

In looking at the overall state map of the Scenic routes, however, I was struck by the inconsistency of the designated roads. It would appear that the selected roads in some locations must have established by a sub-committee of counties, with some counties not at the table, rather than by an evaluation of actual "routes".

For one specific example: Whitman county has a number of designated roads (All of which I have travelled, and which I concur are worthy) However, as those roads reach the Spokane county line, the designation ends! And, the designated road west from Colfax (SR 26?), while scenic, loses its "scenic" designation at the Adams County line, just before some of most distinctive geology in the area as you approach Washtucna.

Which raises the question:

What efforts are being made to evaluate extension of the scenic system (ie, considering actual routes as opposed to simply segments of roads?)

As an Architect, I have been involved in many public involvement and agency planning and policy activities. Believe me, I understand the challenges! But I could not pass by the opportunity to challenge the developers of the current plan to think comprehensively --- they may be missing an opportunity with this plan to establish a framework for a greatly enhanced and effective system as well as meeting whatever shorter-term goals have been established for the plan.

Through the Small City's group organized by the Benton Franklin Council of Governments, a segment of highway has been determined to be of significance both to the State and to the Region. This segment extends on highway 26 from the Adams/Whitman County line to Washtucna where it heads south on highway 260 passing through Kahlotus and Connell to link with the Coullee Corridor on highway 17. This stretch includes Palouse Falls and other geological formations that were a result of the Ice Age Floods. Staff has been working with the mayors of the effected cities and County Commissioners from Franklin and Adams Counties on this project. Flood waters from Lake Missoula came down both from the north through Dry Falls through Connell and also from the East through Washtucna, Kahlotus and met up with the flow from the east at Connell. Because of the geological and historical significance of the area we feel that segment of 26 and 260 should be included in the State Scenic and Recreation Highway System. Thank you

I clicked on the Chuckanut Drive scenic map and it comes up as Chinook Pass Scenic Byway. You might want to correct that.

Please be sure to accommodate bicycle traveler's needs in your plans. Both with wide shoulders and rest (camp) stops.

All funding for this project needs to be suspended until the state's fiscal condition improves. Discretionary spending needs to stop!

Why are public hearings only held in the western portions of the state and not any in far eastern Washington, especially since there are numerous scenic & recreational highways located there? Shouldn't there be a public hearing at Colville where byways and recreational highways are located?

Is the SR 706 Sahara Creek Trailhead and Campground in Pierce County (near the town of Elbe) associated with a this program?

Public Comments on DRAFT Scenic and Recreational Highways Plan

this page is real cool....

Highway 97A runs through the City of Entiat and is a scenic highway (Cascade Loop). My main concerns For the City of Entiat are; Access, speed limit control and signage regulations with in the City limits. Another concern is clear guidelines of the right away area and who controls the right of way areas along the highway.

We need to preserve our Scenic and Recreational Highways.

It doesn't hurt people to slow down a little. This not only allows people to see our states beautiful sites but also conserves fuel. We need more areas for families to get out and educate our youth about nature. Everyone could benefit from taking life slower and take time to smell nature.

The State Hwy. 195N through Uniontown is part of the history of this area. I am disappointed that a 6 ft. rock wall that was built by the Transportation Dept. in the 1960 has been abandoned and is in dire need of repair. It is an eye sore and may very well also be a hazard as the large rocks that were once a part of the wall fall. What a shame that the state doesn't think it is important to fix what they originally built.

Was wondering if a crosswalk on SR 7 in front of the chevron station would be considered in this... would be really helpful for the school children none in the area at this time. (SAFETY)

I believe the goals of preserving, protecting and enhancing the scenic quality and recreational opportunities of our State Scenic By-ways are very important. In order to make sure these goals are reached DOT can

1. Comment on all DEIS notices of projects that border State S&R Hwy. Dot must discourage increased residential development next to or impacting the state By-ways.
2. DOT can deny any new requests for driveways onto State S & R Hwys.
3. DOT must partner with DNR and ask that permits for clearing on adjacent lands, especially on steep slopes next to Hyw., be denied.
4. DOT can actively pursue monetary reimbursement for slides and repairs to Highways caused by road building and property clearing above state highways. I am thinking of Chuckanut Drive in particular, which has numerous slides, and many more in the last 20 years with land disturbances above the roadway.
5. Public safety for current travellers must be primary concern. That means limiting new development that increases traffic and lessens safety.
6. Specifically related to Chuckanut Dr. in Whatcom County and Skagit county; all new developments are required to send DOT a notice of DEIS, making comments to the undesirability of new residential development and logging on the steep slopes is imperative to maintaining some degree of safety and reliability to this roadway.
7. The area around Chuckanut Drive represents the last opportunity to preserve a greenbelt from the Cascades to the sea, and this must be elevated in the priority list for preservation. DOT can partner with other public agencies to deny new permits and protect the fragile nature of this Highway.

Public Comments on DRAFT Scenic and Recreational Highways Plan

- 1) Scenic and Recreational Highways with small or relatively inactive "Friends of" or Byways groups have less capacity to participate in planning processes, attend meetings, identify needs and generate project ideas. In completing this plan, WSDOT should proactively seek input from as many of these groups as possible.
 - 2) Some Scenic and Recreational Highways have no advocacy groups at all. In the future, WSDOT's Scenic and Recreational Highways program will need to find other ways of connecting with appropriate stakeholders for these highways. Possibilities may be through city or county contacts or staff at other state or federal agencies (Parks, DNR, USFS, etc.) with a knowledge of the area.
 - 3) There may be project needs on Scenic and Recreational Highways that are not getting captured in this planning process (i.e., Appendix A) because there are no active advocacy groups to propose them. To the extent WSDOT can identify project needs in other ways, that would be very helpful.
 - 4) Scenic and Recreational Highways with small friends/byways groups may need additional technical support from WSDOT staff. Technical support should, in general, be an important component of WSDOT's Scenic and Recreational Highways program in the future.
 - 5) Some friends/byways groups are interested primarily in preservation of the resources along the highway, not marketing or tourism. These groups may need a different kind of support from WSDOT than groups with active marketing/tourism efforts. For example, more help with environmental issues.
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- 1) As a member of the board of the San Juan Islands Economic Development Council that has worked to connect the islands to the mainland I am concerned that the local jurisdictions (Town of Friday Harbor and San Juan County) were not being included in this planning process yet may be impacted if this plan is enacted. Although active in the evolution of the SJISB, San Juan County is the only county that is not part of a regional transportation planning organization. If the plan and congruence with an RTPO is intended as the basis of future byway funding does it mean the SJISB may not be eligible?
 - 2) Although the San Juan Islands have significant resources identified on the Resource Planning Index Values chart (page 13 of the plan), none of the related text refers to the San Juan County Marine Stewardship Area, or to any issues that have been identified as critical to the recovery of the Salish Sea or Puget Sound ecosystems. Indeed, the narrowness of the "Resource Planning Index" is of grave concern; it fails to substantially address any of the intrinsic elements identified by the national scenic byway criteria. I urge WSDOT not to use this as part of the plan.
 - 3) As the occasional coordinator of projects funded by the FHWA NSBP I have hesitated to pass along the details of this planning process to our local organization members since it seemed that it did not pertain to our situation. Now that it is evident that the intent of the plan is to shape WSDOT's administration of the National Scenic Byways Program in the state of Washington I feel it is imperative that the comment period should be extended so that all members of the byways community (ie each local jurisdiction, chamber, grassroots organization) can have an opportunity to comment. Please extend the comment period.

Public Comments on DRAFT Scenic and Recreational Highways Plan

- 1) Regarding the unfunded statewide need for projects in Appendix A (in the Executive Summary on the bottom of page 1), how will these be prioritized and funded? (By the way, where can I find the Appendix?)
 - a. If these needs are not in a plan, how would you prioritize and fund them? It would be nice to describe to the public how their Scenic and Recreational Highway improvements would be funded. You have the performance measures described, but where is the funding going to come from?
 - b. Perhaps the funding reference could be incorporated into Section 4.
 - c. It seems you would want to develop a transparent, fair and need based prioritized list of projects with a plan for funding those projects (or a way to fund them through diverse sources).
 - d. On page 19 under Corridor Management Plans there is mention of \$3 million invested in plans. Here or in Section 4 you could explain more about the expected prioritization process and future funding. This is where we got funding in the past, and this is how we expect to get funding in the future.
 - e. People want to know what you are going to do, so by having a plan with prioritized projects and a funding strategy it would help sort out the wish list of needs.
- 2) Regarding the Environmental Goal, what about natural and cultural resources? How can this be an environmental goal if there is no mention of natural and cultural resources in the goal? I suggest those terms be added to the goal.
- 3) Under Implementation Steps: #1: change the text to read: local land use decisions and environmental considerations associated with...
- 4) Then consider incorporating into one of the performance measures or just on its own: Number of acres where improvements were made to mitigate or protect cultural or natural resources.
- 5) Regarding the Mobility Goal, consider adding to performance measures: Miles of Scenic and Recreational Highways that have been incorporated into six-year regional transportation improvement programs. (This was referred to on the bottom of page 8 of the plan.) How will these things ever get funded if they aren't in the TIP's.

...If this is just Scenic and Recreational Highways, where does the 20-year plan for Scenic Byways show up in the Transportation Planning? Where in a long term plan does WSDOT make the commitment to Scenic Byways for project support, organizational assistance, marketing, peer networking, and grant application processes?

In the listing of resources to preserve and enhance, archeological is consistently omitted (as per one of the six NSB program intrinsic qualities). I do not know if this is accidental or intentional. It is, however, an important part of the story of many scenic byways and their CMP's. This omission occurs in the Executive Summary, twice in Sec. 1, Sec. 4, and in the Conclusions. My name and our byway are still listed incorrectly. My known/most used name is Sande spelled with an "e" (or Sandra as more formal). Our byway name is the Strait of Juan de Fuca Highway SR112 Scenic Byway.

In the Contents page, Sec. 4 page numbering is not sequential.

The Safety Goals are either missing a goal or the numbering is incorrect.

The references to several appendixes and background papers would make for a time-consuming read. When the final Strategic Plan is online, there should be direct links to any of these papers still referenced and/or include the WSDOT page link so they would be easier to find.

Public Comments on DRAFT Scenic and Recreational Highways Plan

WDFW believes that implementation of this plan will benefit Washington State by increasing access to recreational activities across the state; WDFW have some comments on the overall process as well as on specific proposals.

Many of the projects could require a Hydraulic Project Approval from WDFW or may fall under conditions in the WDFW/WSDOT Memorandum of Agreement. Staff suggests early consultation and review by Area Habitat Biologist to identify resource issues. Additionally, all sites should be reviewed for Priority Habitat and Species presence and biologist consulted to discuss any resource concerns.

Staff thought that there were possible opportunities to include additional WDFW lands and access sites, particularly in Pacific County, in this plan. Greg Schirato, Region 6 Wildlife Program Manager, would be the contact person to identify and discuss these additional areas.

In Grays Harbor and Pacific County, WDFW have these specific comments on identified proposals.

The following projects will have moderate to high benefit for recreational fishers and/or clam diggers. Proposed work windows should be coordinated with Dan Ayres (360-249-1209) WDFW Region 6 office in Montesano to avoid major closures or traffic disruption during harvest seasons.
HWY 109 Humptulips Boat launch improvements - Fishing season typically occurs Sept – April.

HWY 109 Pacific Beach Trails. Work could benefit recreational razor clam diggers. – Moderate to High fishery benefit.

HWY 109 Beach Access/Viewpoints. Work could benefit recreational razor clam diggers. – Moderate to High fishery benefit.

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HWY 109 Safety Pull Out. Work could benefit recreational razor clam diggers. – Moderate to High fishery benefit.

HWY 109 Pacific Beach Rail Road Grade Beach Access. Work could benefit recreational razor clam diggers. – Moderate to High fishery benefit.

HWY 105 Twin Harbors camping and safety improvements. Work could benefit recreational razor clam diggers. – Moderate to High fishery benefit

In Clallam County: “Ho Oxbow” should be “Hoh Oxbow”. Improvements to HWY 101 at the Bogachiel River will provide recreational access benefit as will renovations to HWY 101 at Sequim Bay. It is suggested that the Elwha Viewpoint project would benefit from restroom facilities; HWY 112 Hoko River State Park could benefit anglers and others by providing a new recreational access for non consumptive wildlife activities.

In Pacific County: The HWY 105 Bridge over the Willapa - work should include a boat launch/access point.

A number of projects did not have enough information available for WDFW to make comment at this time. These are: HWY 109 Copalis Natural Spit Area, HWY 112 Clallam Bay Park Bridge, HWY 112 Snow Creek Day Use Area, HWY 112 Construct pull-outs at Sail and Seal Rock, Deep Creek/Twin River, Shipwreck, vicinity Naselle HWY, and HWY 109 Grays Harbor National Wildlife Refuge Interpretive.

Public Comments on DRAFT Scenic and Recreational Highways Plan

The plan is vague and does not adequately communicate WSDOT's intent

The draft plan is unacceptably vague. A wide range of terms that are critical to understanding WSDOT's intentions are left undefined, and the bulk of the planning document is focused on background information rather than action elements. A plan document should, as its core purpose, clearly communicate the likely outcomes of its implementation. A number of reviewers has read this document and are not able to understand its intent or WSDOT's likely actions for implementing the plan. Some of the critical issues that require clarification include:

- WSDOT's interpretation of management activities that are unique to the SS&RHS (as opposed to highways not in the SS&RHS) are not clearly defined. The implementing legislation for the SS&RHS directs WSDOT to manage the operations and maintenance of SS&RHS roads in the same way that highways of the same classification that are not in the SS&RHS are managed. In addition, the RCW directs WSDOT to support policy goals and undertake activities specific to the SS&RHS that would presumably not be undertaken for roads outside of the SS&RHS. The plan does not adequately articulate the activities that WSDOT will undertake specific to the SS&RHS, as opposed to maintenance and operations activities that would normally be undertaken on highways of the same classification as SS&RHS roads.
- Key terms that are not defined include important language for the SS&RHS goals selected for inclusion in the plan. Examples include *traveler areas*, *traveler services*, *tourism*, *management plans*, and *access*, among others.

The plan is not an appropriate basis for any WSDOT actions regarding WSDOT's administration of the National Scenic Byways Program in Washington State.

The draft plan is not a valid basis for allocating staff resources for WSDOT's administration of the National Scenic Byways Program in Washington State, or for prioritizing Washington State projects for funding under the National Scenic Byways Discretionary Grant program. WSDOT has the authority and obligation to plan for the state's role in administering the National Scenic Byways Program. However, throughout the SS&RHS planning progress WSDOT repeatedly and consistently emphasized the distinction between planning for the SS&RHS and WSDOT's administration of the National Scenic Byways Program, and consistently and emphatically stated that this planning process was related **only** to the SS&RHS, **not** the administration of the Scenic Byways Program.

Frequent comments from the public and the steering committee regarding WSDOT's administration of the National Scenic Byways Program were dismissed as irrelevant to the current planning process because they were not focused on the SS&RHS. This was not an isolated incident or misunderstanding. Instead, WSDOT staff repeatedly insisted on the separation of this planning study from issues related to the administration of the National Scenic Byways Program in Washington State.

However, the draft plan continues to cite language from FHWA authorizing states to plan for the administration of the National Scenic Byways Program as an example of authority for planning under federal guidelines, and in many places blurs the distinction between the SS&RHS and WSDOT's administration of the National Scenic Byways Program.

(Continued...)

Most troubling, although it does not appear in the draft Plan, WSDOT's response to Northwest Tribal Tourism as part of the formal tribal consultation process includes a revision of the purpose statement of the SS&RHS plan that explicitly states WSDOT's intent to use the plan as the basis for prioritizing Washington State's submittals to the National Scenic Byways Discretionary Grant Program.

At different times in the planning process WSDOT has specifically emphasized that the current plan was not relevant to WSDOT's administration of the National Scenic Byways discretionary grant program, including examples like:

"The Scenic and Recreational Highways Plan is not addressing the National Scenic Byway Grant Program. The purpose of the Scenic and Recreational Highways Plan is to:

- Provide guidance to WSDOT programs
- Inform other planning efforts such as the Washington Transportation Plan
- Provide heightened awareness of the value of the state scenic system
- Fulfill the need to include a Scenic and Recreational component to the Multi-Modal Transportation Plan as required by state law (RCW 47.06).

This Plan will establish programmatic objectives and performance measures consistent with the State's transportation policy goals (RCW 47.04.280) and will be updated every two years."

and

"Addressing federal funding through the National Scenic Byways Program is not within the scope of the Plan. The purpose of the plan is to develop program level goals, objectives and performance measures in order to:

- provide guidance to WSDOT programs,
- inform other planning efforts such as the Washington Transportation Plan,
- provide heightened awareness of the value of the state scenic system, and
- fulfill the need to include a Scenic and Recreational component to the Multi-Modal Transportation Plan as required by state law (47.06)."

However, in the reply to Northwest Tribal Tourism the first sentence of the purpose statement for the SS&RHS plan is revised to read:

"Our purpose is to develop guiding principles (goals, objectives and performance measures) that will establish a framework for WSDOT's program and guide our ranking of National Scenic Byway Grants for FHWA."

WSDOT clearly has authority to develop an administrative basis for prioritizing National Scenic Byways Grants. However, it can not be based on a plan that WSDOT explicitly and repeatedly stated was **not related** to the administration of the program that authorizes WSDOT to prioritize those same grants.

The planning process emphasized that the plan was intended only for WSDOT's management of the SS&RHS, not WSDOT's administration of the National Scenic Byways Program in Washington State. It is inappropriate to cite WSDOT's authority for planning under the National Scenic Byways Program as a basis for the SS&RHS plan.

(Continued...)

Throughout the planning process WSDOT has consistently emphasized that the SS&RHS plan was separate from both the National Scenic Byways Program at the federal level and WSDOT's administration of the National Scenic Byways Program. This section accurately reflects WSDOT's ability to plan for the state's administration of the National Scenic Byways Program. However, based on WSDOT's repeated position that the SS&RHS plan is not related to the administration of the National Scenic Byways Program, this section should be irrelevant to the SS&RHS plan. If the plan is considered a substantive part of WSDOT's administration of the National Scenic Byways Program, the planning process should be extended to allow consideration of issues relevant to the National Scenic Byways Program and Washington State's Scenic Byways that WSDOT repeatedly excluded from consideration during the SS&RHS plan process.

The Stewardship Index is not yet ready for use. Either the fatal flaws in this version of the Stewardship index should be addressed or the Stewardship Index should be removed from the Draft Plan.

The Stewardship Index is a good first attempt to understand SS&RHS resources, threats, and opportunities. With further development it could become a valuable tool for WSDOT and its partners in the continuing work to enhance the SS&RHS. However, in its current form the Stewardship Index is not an accurate reflection of the resources or opportunities related to the SS&RHS and should not in any way be used to influence the allocation of staff or funding resources related to the SS&RHS. Any use of the Stewardship Index in its current form to influence funding, prioritize projects, or evaluate the effectiveness of stewardship activities and partnerships would be arbitrary and inappropriate.

There are three significant substantive deficiencies with the Stewardship Index in its current form that are important enough to be considered fatal flaws:

- **Lack of critical data.** The data available for use in the analysis is incomplete. Most importantly, the mapping does not include any meaningful measurements of scenic or recreational resources. It is inappropriate to characterize the resource quality of the Scenic and Recreational Highway System without including meaningful measures for scenery or recreation. While the historical scenic values map has been produced, it lacks detail or current information.
- **“Apples to oranges” comparisons.** The data layers developed for the analysis are not comparable in fundamental and important ways. For a few examples, terrestrial habitat data is pre-screened in a way that other resources are not, aquatic habitat is double counted and includes very broad buffering for evaluating impact, and a wide variety of different types of protected areas are used as stand-ins for an even wider variety of resource values (everything from habitat quality to scenic and historic resources) that are inappropriate to compare to each other. These different layers are then combined using a very simple weighting scheme that is not substantively related to the key issues for the SS&RHS identified in the planning process.

(Continued...)

- **Inappropriate analytical approach.** Further compounding the “apples to oranges” problem of data being inappropriately compared, the Stewardship Index uses a simplistic additive model for identifying priority areas, and does not effectively incorporate local land use into the analysis. The additive analysis method lumps together resource quality (although this is inadequately modeled and incomplete) with protected area status, inappropriately mixing resource quality with management status. A more appropriate and established method for this kind of analysis would be a gap analysis process, that would separate the issues of resource quality and management status. Typically in this type of analysis different resources would be mapped first. Then, a second layer of analysis would evaluate the management status of the affected area. For example, the resource analysis would first map where the SS&RHS included outstanding scenery, important habitat, historic resources, recreational settings, and other values. Then, a management overlay would show where those resources were protected by specific public land designations or local land use regulations, or where they may be threatened by incompatible land use designations or management. The simplistic and incomplete use of local land use in the analysis, along with the simplistic and inappropriate mixing of resource values with management status leads to analytical outcomes that should not in any way guide management or funding priorities.

For the above reasons, it is inappropriate at this time to include the mapping generated by the Stewardship Index project in the SS&RHS plan. Including the Stewardship Index maps in the plan suggests that they have a valid, substantive relationship to the range of goals and objectives described in the plan, and by extension, to the legislative intent of designating the SS&RHS. Currently, the Stewardship Index is too incomplete to accurately represent the range of resources or management considerations that would allow the mapping to have any valid relationship to the goals described in the plan. The Stewardship Index maps should be removed from the draft plan until a future version is available that is more robust and applicable to the issues addressed in the SS&RHS plan.

Steering Committee & public input has not been adequately incorporated into the draft plan, or alternately the rationale for not incorporating specific input has not been made public.

Although WSDOT appointed a large steering committee, many members have been unable to participate, and substantive input from the Steering Committee and the public has not been adequately incorporated into the draft plan. A wide variety of comments from the steering committee and public have been arbitrarily omitted from the draft plan without discussion or justification. The process included the development of background papers which were used as the basis for many parts of the draft plan, however many substantive comments made in response to the background papers don't seem to have been incorporated in the corresponding sections of the draft plan, even when the response to the comments on the background papers indicated that they had been noted and incorporated. No final drafts of the background papers have been made public, and it is unclear what purpose they served in the process if comments on the background papers were not considered when those same topics were discussed in the draft plan.

(Continued...)

There are many issues not addressed in the plan that the steering committee and members of the public have requested be specifically addressed, or provided specific comment on in the planning process. These include, among others, clarification on the relationship between the SS&RHS plan and the state's scenic byways; clarification on the role that the plan will play for prioritizing projects submitted for funding through the National Scenic Byways grant program; specific descriptions of roles and responsibilities partner agencies, local governments, and NGO byway stewardship groups will play in the management of the SS&RHS; and many others.

In addition, in response to discussion at a Steering Committee meeting and WSDOT request, Steering Committee members developed detailed and specific guidance for the SS&RHS objectives, WSDOT activities for implementing the plan, and measurable outcomes. These comments were not incorporated into the plan, and no discussion justifying their omission from the plan has been made public.

Lack of Clarity in Terms

WSDOT has yet to clarify in writing the difference between a Scenic and Recreational Highway and a Scenic Byway. Both Draft Plan 1 and 2 are missing this basic information. Washington's Scenic system is comprised of roughly 50% Scenic byways and 50% Scenic and Recreational Highways. The difference between the two systems needs to be explained. It is relevant to this Plan.

Both terms (Scenic Byway and Scenic and Recreational Highway) have been used interchangeably throughout the planning process, in documents, and in public statements by WSDOT staff, and the Secretary of Transportation while presenting to the Transportation Commission. The planning committee was misled. The public was told on many occasions that the S&R Highway Plan does not pertain to Scenic Byways. In Draft 2 – suddenly it does pertain to Scenic Byways.

Public Process: Lack of Public Representation for the Scenic and Recreational System

Residents who live along the S&R Highways have no idea that this planning process is taking place.

A Steering Committee provided input into the S&R Highway Plan. Of concern to the public has been the lack of appropriate representation for the towns and counties along the S&R Highways – which comprises about 50% of our state highway system.

Is WSDOT assuming that the 1 Steering Committee participant (Ashley Probart) who is affiliated with the Association of Washington Cities– is to represent the interests of all of the towns and that exist along 50% of our State Highway system? It is hard to imagine that this would be considered representative.

(Continued...)

Expectations of achieving Performance Measures

WSDOT outlines Performance Measures but does not indicate who is responsible for achieving them and what the consequences are if they aren't achieved. The concern is that the plan will be used to control which projects are approved for grant funding. There is no confidence that this maneuvering is in the best interest of byways.

WSDOT Entering the Land Use Arena

Draft Plan 2 comments repeatedly on the fact that some CMP's are not incorporated in local land use documents. This is neither a surprise or an oversight. The Scenic Byway program is a grassroots program. CMP's are developed and either incorporated further or not, based on the desires of each community. The fact that some CMP's are not incorporated (and thus "regulatory") is intentional. The last thing most scenic byways want is a regulatory connection!

The State Legislature does not authorize WSDOT to impose Land Use criteria on local communities.

Only the Scenic Byways have CMP's. The remaining 50% of the Scenic and Recreational Highway system does not have CMP's, nor does it have organized groups interested in developing them. The concern again is that Byways will be held responsible for achieving WSDOT dictated goals and the rest of the SS&RHS will not.

WSDOT's Departure from the Intent and Goals of the National Scenic Byway Program and the Resulting Financial Impacts to the State

With this Plan, WSDOT is taking the Scenic Byway portion of the system away from the goals and intent of the National Scenic Byway program. The National Scenic Byway program guidelines specify a grassroots, non-regulatory, community driven program.

Throughout this planning process and with this Draft Plan, WSDOT is trying to corral the scenic byways into a regulatory structure. It is not a good fit! We are very concerned about losing federal Scenic Byway funding that goes directly to Washington communities. WSDOT needs to take note of the difference in federal scenic byway funding received by two comparable states, Oregon and Washington. Oregon, a state that is in line with the intent of the NSB program, is receiving more than twice the amount of funding, than Washington.

Finally, please correct the spelling of my name on the Steering Committee list.