

Washington’s Scenic and Recreational Highways Plan
Public Comments Received on Background Paper #1

Northwest Tribal Tourism Comments	WSDOT Responses
<p>Comment [V1] According to RCW 47.06.050, a Scenic and Recreational Highways Plan is not “required” as an element to the Multi-Modal Plan. This needs to be corrected as it is misleading.</p>	<p>RCW 47.06.050 states, “The state-owned facilities component of the statewide multimodal transportation plan shall consist of.... (d) A scenic and recreational highways element, which shall identify and recommend designation of scenic and recreational highways, provide for enhanced access to scenic, recreational, and cultural resources associated with designated routes, and recommend a variety of management strategies to protect, preserve, and enhance these resources. The department, affected counties, cities, and towns, regional transportation planning organizations, and other state or federal agencies shall jointly develop this element”</p>
<p>Comment [V3] RCW 47.39 does not define or state the term Scenic Byways and Recreational Highways as interchangeable; it does distinguish roadways, such as – Scenic Byways and All-American Roadways – and it does identify each as part of the scenic and recreational highway system.</p>	<p>The terms Scenic Byway; National Scenic Byway; and All American Road are not defined in state law in terms of there specific highway sections. The term Scenic and Recreational Highway is defined and segments of state highway are listed in the law. Interim federal guidance for the National Scenic Byway Grant Program discusses the term “Scenic Byway”.</p>
<p>Comment [V4] Is this provided to support the idea that the Scenic and Recreational Highway and Scenic Byways are interchangeable? If so, RCW 47.42.025 seems to contradict this as it excludes sections of the Scenic and Recreational Highway System from the Scenic System.</p>	<p>Scenic and Recreational Highways are part of the Scenic System with few exceptions (as listed in the law). There are less than 30 miles (less than 1%) of the Scenic System that are not defined as Scenic and Recreational Highways. It is not clear what the concern is.</p>
<p>Comment [S6] To be clear, this report should also refer ONLY to scenic and recreational highways and ONLY Scenic Byways, where applicable. Scenic Byways have different requirements and intrinsic qualities. These tow terms must be made excruciatingly clear throughout the plan.</p> <p>Can WSDOT please post the latest map on the list-serve as well as on the scenic byway discussion area? (when we met with Paula we received a copy of the map.) Also, for historic progress, can you create a timeline with maps showing how these have changed since the Scenic Byways Program was conceived?</p>	<p>Scenic and Recreational Highways are defined in state law (RCW 47.39). With few exception, a state highway is identified as a Scenic and Recreational Highway in order to be eligible to apply for National Scenic Byway grant funding. Historically, the term Scenic Byways has been used to refer to routes designated for marketing purposes. WSDOT has distinguished between the two in the map available on the website: http://www.wsdot.wa.gov/NR/rdonlyres/C47B4957-A37A-4898-8513-35F9981A9C52/0/ScenicByways_Compare_v2.pdf</p> <p>The map was posted on the website in mid-July. Historic maps are available.</p>

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<p>Comment [S7] How many miles make up scenic byways as of 2009? What is the percentage of byway compared to the highways in Washington? What is the percentage of Scenic and Recreational Highways compared to highways in Washington?</p>	<p>There are 4,006 miles of Scenic and Recreational Highways listed in state law (RCW 47.39). There are 2737 miles of marketing routes identified on the map made in 2006. State law gives the authority to identify routes for mapping and marketing purposes, but not outside the sections of state highway defined as scenic and recreational highways. Some of the 2737 miles of marketing routes appear to be outside the scenic and recreational highways.</p>
<p>Comment [V8] Is the state highway system the same as the Scenic System – as described in the paragraph above? If not, it would be valuable to know what this system is and how much of the Scenic System makes up the State Highway System.</p>	<p>State Highways are defined in state law and together make up the State Highway System. As stated in Background Paper #1 there are approximately 7,000 miles of state highways in Washington. There are 4,006 miles of Scenic and Recreational Highways that with few exception make up the Scenic System. An additional 30 miles of the Scenic System that are not identified as Scenic and Recreational Highways. More than half of the state highways in Washington are identified as Scenic and Recreational Highways.</p>
<p>Comment [S9] This is confusing: a state scenic byway is not necessarily a national scenic byway; state scenic byways are also eligible for FHWA’s funding. Is this required by state law? Interim guidelines do not require legislative action.</p>	<p>This is un-necessarily confusing. That is why WSDOT is using terminology per the state law (47.39) which recognizes Scenic and Recreational Highways. State law does not define the term “state scenic byway”. We will revise the sentence to read, “It is the intent of federal legislation that a segment of state highway is recognized in state law in order to become eligible to apply for National Scenic Byway grant funding.”</p>
<p>Comment [V11] This question should not be asked in connection to Scenic Byways as it is not consistent with the federal guidelines that created the Scenic Byway program, including: The FOCUS – Scenic Byway Managers/Communities along a scenic byway create a corridor management plan (CMP) to establish a FOCUS which addresses local needs as well as user services. WSDOT cannot possibly identify a single FOCUS that represents all Scenic Byway communities, nor is it WSDOT’s Role to do this.</p>	<p>The purpose of the plan is to:</p> <ul style="list-style-type: none"> • 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). <p>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.</p>

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<p>Comment [V12] WSDOT is responsible for “providing technical assistance and guidance” for this program to byway mangers who lead project planning and development, etc.</p>	<p>We believe this comment is referring to WSDOT’s role in administering the National Scenic Byways Grant Program. WSDOT also has a role in managing the Scenic and Recreational Highways outlined in state law (primarily RCW 47.39 and 47.42).</p>
<p>Comment [V13] There are six intrinsic qualities in order to qualify as a Scenic Byway. Is this cited in this background paper?</p>	<p>No. The Scenic and Recreational Highways Plan is focused on meeting the intent of state law rather than discussing or describing the eligibility requirements for the National Scenic Byways Grant Program.</p>
<p>Comment [S15] Reference is made to scenic and recreational highways, which can include scenic byways, but does not specifically mention scenic byways. Cannot find the “Statewide Multi-Modal Transportation Plan” on-line to refer to.</p>	<p>The terms Scenic Byway; National Scenic Byway; and All American Road are not defined in state law in terms of there specific highway sections. The term Scenic and Recreational Highway is defined and segments of state highway are listed in the law. Interim federal guidance for the National Scenic Byway Grant Program discusses the term “Scenic Byway”.</p> <p>The Statewide Multi-Modal Transportation Plan is available on WSDOT’s website at: http://www.wsdot.wa.gov/planning/wtp It is being updated by Washington State Transportation Commission now.</p>
<p>Comment [V16] ...DOT is not required to create a Scenic and Recreational Highways Plan as part of the Multi-Modal Transportation Plan, as stated in the background paper. Bullet point 1 is addressing Scenic and Recreational Highways and Bullet point 2 is addressing just Scenic Byways. Is 1 asking to develop designation guidelines for Scenic Byways or Recreational Highways? If so, Washington State has operated a Scenic Byways Program for over 20 years and has been participating in the federal (grant) program since the early 90s. What guidelines we used for designation? Additionally, the federal program provides guidelines for Scenic Byway designation which WSDOT should adopt if not using already. Bullet point 3 addresses strategies for protecting, preserving, etc. each Scenic Byways CMP includes a strategy for maintaining and enhancing the byway’s qualities – as described in FHWA guidelines.</p>	<p>WSDOT refers to all elements of the Statewide Multi-Modal Plan as individual plans for example: Aviation Plan, Freight Mobility Plan, Bicycle and Pedestrian Plan, Highway System Plan. Not sure what the concern is with this practice.</p> <p>The requirements of the state law are re-stated here in Background Paper #1 (RCW 47.06.050).</p>

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<p>Comment [V17] This is not an update – correct? A State Scenic and Recreational Highways Plan does not currently exist or is this an update to the Scenic and Recreational Highways Element included in existing state-wide plan? Regarding legal obligation, please refer to V9 above.</p>	<p>Prior Highway System Plans and the State's Multi-Modal Plan have included some discussion of Scenic and Recreational Highways in the past. However, a complete plan that aligns with agency and state policies has not been developed. So, technically it is an update of what has been done in the past. However, it will cover new ground as well.</p>
<p>Comment [V18] What section of the US Code States this? FHWA docket no. 95-15, Section 3a) reads, "Any highway or road submitted for designation under the National Scenic Byways Program by State or Federal agencies should be designated as a State Scenic byway. However, roads that meet all criteria and requirements for National designation but not state or federal agencies designation criteria may be considered for national designation on a case-by-case basis."</p>	<p>The federal law that discusses the National Scenic Byway Grant Program is Title 23, Sec. 162 USC.</p>
<p>Comment [V19] How does distinguishing between state and national programs create support for state strategic planning, when nowhere does it state this in the US Code or FHWA's Interim Policy.</p>	<p>FHWA supports state planning and state definition of goals. Washington state has 5 Transportation Policy Goals and WSDOT is tasked with meeting them. The Scenic and Recreational Highways Program is one of many programs that help Washington state meet the Transportation Policy Goals. The National Scenic Byway Grant Program is one of many federal programs available to help Washington State meet its goals.</p>
<p>Comment [S20] The words "Strategic Plan" are not included in either the code or 1995 interim policy. Both Title 23 & the FHWA's 1995 Interim Policy reference Corridor Management Plans</p>	<p>There appears to be confusion between the US Code that establishes administration of the National Scenic Byways Grant Program and the requirements of state law. All plans in Washington are to be strategic and include goals, objectives and performance measures. Washington in many cases meets and exceeds federal requirements.</p>

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<p>Comment [V21] Why is this included? It doesn't support the purpose for the plan. It seems the only purpose to include this is make the point that the state is not prevented from implementing its own strategies for the National Byways Program... If the state has no agenda to revise the current program, what is the significance of including this section of the USC? It gives the wrong impression of WSDOT objective.</p>	<p>This paragraph is included to show that FHWA supports state planning efforts that help states to make use of the National Scenic Byway Program to help meet their individual goals. The purpose of the Scenic and Recreational Highways Plan is to:</p> <ul style="list-style-type: none"> • 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). <p>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. Some current practices may change to align with the goals, objectives and performance measures – as with implementation of any plan. Not sure what the concern here is related to revision of the current program or if this is in reference to state or federal program. WSDOT can not make changes to the National Scenic Byway Grant Program.</p>
<p>Comment [S22] We should have a list of Steering Committee Members including their names, titles, who they represent, their email address, their phone number and addresses and the contacts for the Scenic Byways as well as Scenic and Recreational Highways. Would also like to request how each steering committee relates to scenic byways versus scenic and recreational highways. Finally, there should be a full listing each of the scenic byway contacts even if this includes more than one person.</p>	<p>WSDOT has invited 18 stakeholder agencies and organizations to participate in the Steering Committee including 2 local non-profit organizations representing local byways. It should be noted that this is broader participation than WSDOT enlists for the development of Washington's Transportation Plan. Each organization and individual participants name is listed in Background Paper #1. Some Steering Committee members ask that their email addresses not be listed on websites to minimize spam. All non-profit organizations representing local byways have been listed on WSDOT's website.</p>
<p>Comment [S23] Most of the Steering Committee members seem to be from Seattle or Olympia. The reason for concern is that the majority of the scenic system is located in rural regions.</p>	<p>Most Steering Committee members represent state agencies and statewide organizations. Public comment is being sought throughout the process.</p>
<p>Comment [S24] The timeline appears to show accepting public comment at the same time as releasing the final plan.</p>	<p>Yes. We will start writing the final plan as soon as the formal public comments start to come in to WSDOT on the draft plan.</p>

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<p>Comment [S25] Where did these three primary purposes and priorities come from? The first meeting stressed the need to remove confusion between Scenic and Recreational Highways and Scenic Byways – this took up a majority of the meeting because the first WSDOT Powerpoint used these two terms interchangeably. Another portion was taken up by an overview on “how to create strategic plans”. Much of it had more to do with scenic byways coordinators questions and concerns.</p>	<p>We discussed the origins of these focus areas or program elements at each of the Steering Committee Meetings. See the presentation given on July 15th available on the WSDOT website. http://www.wsdot.wa.gov/LocalPrograms/ScenicByways/BywaysPlan.htm</p> <p>The state legislative finding in RCW 47.39.020 focuses on planning to prevent incompatible development. Much of the feedback we have received to date indicates that the program has a tourism focus. Also, the majority of the projects seeking funding through the National Scenic Byways Grant Program have to date been related to tourism and traveler services. Stewardship or preserving and protecting natural, cultural, and historic resources is also discussed in the state law and federal guidance. If we have overlooked any area that should be included, please let us know.</p> <p>For the first Steering Committee Meeting on July 15th WSDOT held a listening session to better understand concerns. There was a lot of misinformation floating around and it was important to understand what people understood about the project.</p>
<p>Comment [V26] This statement is not consistent with the current status of WA-scenic byways. Planning: Washington’s program is beyond the planning state in its development. Planning comes at the beginning. Most Scenic Byways have completed CMPs and all National designated byways were required to complete a CMP. Our focus is on implementation, subject to funding, of the already written CMPs and on continued preservation of our byways.</p>	<p>Planning is one focus area of the program that is identified as a priority by the state legislature. While many groups have developed corridor management plans, most of those plans are not as integrated into local, regional and state plans as they could or should be.</p>
<p>Comment [V27] Who are the Byway Interest Groups referred to here? Are these the Byway managers/leaders? If so, they need to be addressed appropriately.</p>	<p>Byway Interest Groups are the local groups with 501C3 non-profit status that advocate for the interests of the byway and are required to form for eligibility and pursuit of the National Scenic Byway Grants. Tribal Nations are not necessarily grouped in here unless they want to be. They may pursue funding through the National Scenic Byway Grant Program by going to FHWA directly.</p>

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<p>Comment [V28] Why isn't the federal program mentioned anywhere in this section? This would be important as Washington State has actively participated in this program since 1992, and byway managers have received funding each year.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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). <p>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.</p>
<p>Comment [V29] As a participant in that meeting – these priorities did not emerge from this meeting, they were presented as the priorities by WSDOT.</p>	<p>These three themes or elements of the program have emerged through discussion with steering committee members, emails, feedback on the background papers, review of the state and federal laws.</p> <p>The state legislative finding in RCW 47.39.020 focuses on planning to prevent incompatible development. Much of the feedback we have received to date indicates that the program has a tourism focus. Also, the majority of the projects seeking funding through the National Scenic Byways Grant Program have to date been related to tourism and traveler services. Stewardship or preserving and protecting natural, cultural, and historic resources is also discussed in the state law and federal guidance. If we have overlooked any area that should be included, please let us know.</p>
<p>Comment [S30] Not true: tourism is the 4th leading industry in Washington State yet tourism funding is very low compared to Oregon and many other states.</p>	<p>This sentence [While tourism has been a high priority for Washington State in recent years and the state has been a leader in this area] refers to the fact that the majority of applications to the National Scenic Byways Grant Program have been related to tourism or traveler services (ie. Rest areas, travel guides, etc) and Washington won a national award this year for it's CD based/web-based travel guide.</p>
<p>Comment [S31] Please specify this was an amendment to the scenic byway program of the San Juan Islands Byway, which included making all ferries a 'scenic byway' for purposes of the Scenic and Recreational Highways Act.</p>	<p>The State Legislature amended the State Scenic and Recreational Highways Act to include all Washington State Ferries routes. This was not an amendment to the National Scenic Byway Grant Program.</p>

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<p>Comment [V32] This whole section is VERY confusing because in the introduction of this document, the term, Scenic System is state as referring to the Scenic and Recreational Highways network and the term Scenic and Recreational Highway is state as referring to those segments of state highway specifically called out in state law (47.39.020 and RCW 47.42.140) and included in Appendix B of this background paper. According to the header, all highways associated with the Scenic System is meant to be included here?</p>	<p>This section contains two paragraphs describing how a section of state highway is added to the list of Scenic and Recreational Highways. It appears that much of the confusion here about how the state laws and federal laws apply. For the purpose of this plan, we are focused on the requirements in state law and not the National Scenic Byways Grant Program. If you can propose alternative wording that would make this section or other sections clearer to you and accurate, that would be helpful.</p>
<p>Comment [S33] To which section or subsection of which act does this refer?</p>	<p>The State Scenic and Recreational Highways Act (referred to as the Act)</p>
<p>Comment [S34] To my knowledge motor vehicle funds have never been made available for scenic byways. If so, please list or give links to these projects. May Scenic Byways themselves apply for these funds directly?</p>	<p>To date, Washington State has received \$15 million total from the National Scenic Byway Grant Program and WSDOT has dedicated \$9 million in State Gas Tax – Motor Vehicle Funds to Scenic and Recreational Highway Projects. Yes. We have mapped the projects and developed descriptions. This information will be included in the Plan.</p>
<p>Comment [V35] What projects are specifically related to Scenic Byways, recreational highways etc individually? I don't see where the map identifies this. It would be good to know what projects are associated with each. What about investments directly associated with byway improvements and maintenance by byway managers? I think this should be mentioned as this would identify accurate byway project activity.</p>	<p>To date, Washington State has received \$15 million total from the National Scenic Byway Grant Program and WSDOT has dedicated \$9 million in State Gas Tax – Motor Vehicle Funds to Scenic and Recreational Highway Projects. Yes. We have mapped the projects and developed descriptions. This information will be included in the Plan.</p>
<p>Comment [V36] It would help us all if we could see a historical timeline complete with the maps for Scenic Byways and Scenic and Recreational Highways. It would also be invaluable to have a copy of the current legal scenic and recreational highway system including scenic byways.</p>	<p>You will find maps of the Scenic and Recreational Highways on the website posted in mid-July http://www.wsdot.wa.gov/LocalPrograms/ScenicByways/BywaysPlan.htm</p>
<p>Comment [S37] RCW 47.39.040</p>	<p>No concern is stated. Not clear what is intended.</p>
<p>Comment [S38] How does the Growth Management Act fit here? It doesn't follow that because Commerce coordinates (47.39.040) that it will also use their GMA staff, specifically on the scenic byways. Need specific cite section of the GMA.</p>	<p>Washington Administrative Code associated with the GMA recommends that local agencies consider scenic and recreational highways when they are completing their transportation elements of their comprehensive plans. So, GMA Staff will provide technical assistance in this area. For additional detail, you may want to talk with GMA staff at Commerce.</p>

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<p>Comment [V39] Is this talking about existing Scenic Byways? If so, most management plans are already in existence. Additionally, the national program provides clear and complete guidelines on what should be included in the Corridor Management Plans.</p>	<p>This section is discussing the requirements for WSDOT in state law. WSDOT is directed to work with local communities on corridor managements for state highways identified in the law. The state law/administrative code does not currently contain guidance on what corridor management plans in Washington should contain. FHWA provides some general corridor management planning guidance for funding eligibility, but it is not specific to Washington.</p>
<p>Comment [S40] Does this refer to Scenic Byways? If so, replace highway with state scenic byway.</p>	<p>The terms Scenic Byway; National Scenic Byway; and All American Road are not defined in state law in terms of there specific highway sections. The term Scenic and Recreational Highway is defined and segments of state highway are listed in the law. Interim federal guidance for the National Scenic Byway Grant Program discusses the term “Scenic Byway”.</p> <p>So, we are using the term Scenic and Recreational Highway to be clear about what portions of state highway are included. The discussion is not referring to the National Scenic Byways Grant Program.</p>
<p>Comment [S41] Definitions Corridor Management Plan means a written document that specifies the actions, procedures, controls, operational practices and administrative strategies to maintain the scenic, historic, recreational, cultural, archeological and natural qualities of the scenic byway (FHWA’s 1995 Interim Policy referred to Page 2)</p>	<p>The comment provides a definition of Corridor Management Plan from FHWA guidance for funding eligibility. Not sure what is intended.</p>
<p>Comment [V42] FHWA provides clear and specific guidance in what should be included in corridor management plans...</p>	<p>FHWA guidance on Corridor Management Plans is general and related to funding eligibility. It is not specific to Washington. It is unclear what the concern is.</p>
<p>Comment [S43] Scenic System definition</p>	<p>It is unclear what the concern is here.</p>
<p>Comment [S44] Scenic Vistas Act – How specifically does the Scenic Vistas Act relate to Scenic Byways</p>	<p>If we are talking about Scenic and Recreational Highways, they are impacted by the Scenic Vistas Act. If we are talking about routes designated for marketing purposes and rely on the map from 2006, many of those routes mapped are also Scenic and Recreational Highways and would be impacted by the Scenic Vistas Act.</p>
<p>Comment [S45] Excerpt from Highway Advertising Act of 1967</p>	<p>Not clear what the comment or concern is here or what is intended.</p>
<p>Comment [S46] Yet only 2 local agencies sit on the steering committee (Association of Washington Cities and Association of Washington Counties)</p>	<p>These organizations represent all cities and counties in Washington.</p>

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Comment [S47] Referenced examples do not necessarily relate to scenic byways. Please give a balanced representation of other states' treatment of their scenic byways.	Before the examples, the background paper says, "This section provides a few examples to stimulate discussion in three primary areas: tourism, stewardship and planning." It isn't intended to be a comprehensive review of other state's programs. Not clear on what the commenter would find to be a balanced representation.
Comment [V48] However, roads that meet all criteria and requirements for National designation but not state or federal agency designation criteria may be considered for national designation on a case by case basis.	Not clear what is intended by this comment.
Comment [S49] While it is true that state law must recognize a byway as a state byway before it can become a national byway, it is only true that the byway be recognized by the governor in order to compete for federal funding.	In Washington, there is a state law addressing this (RCW 47.39). In some states without similar legislation they do executive orders or similar processes to recognize portions of state highway as eligible to pursue federal funding. Not sure what is intended by this comment.
Comment [S50] FHWA Policy Scenic Byway defined.	Not sure what is intended by this comment. Again, there appears to be confusion on the purpose of this plan and the application of federal and state laws. Comment was cut off in .pdf file I received.
Comment [S51] to [V71]	Comment was cut off in .pdf file I received.
Byway Alliance Group Comments	WSDOT Responses
We would like to encourage consistent wording and definitions of usage of terms used in the plan. Include examples and corresponding mileage. For example: Scenic Byway Byway Plan Scenic Byway Plan Scenic and Recreational Highway Plan	Done
Define how "Scenic System" is the same, and how is it different from Scenic and Recreational System.	Scenic and recreational highways are also part of the scenic system. There appear to be about 20 miles of highway that are not consistent in both 47.39 and 47.42.
Differentiate between Scenic and Recreational Highways, State Scenic Byways, and National Scenic Byways and All American Roads on map and in a written description.	No reasoning is given for this request. We believe it is important to minimize confusion about all these classifications and terms and use the term defined in state law – Scenic and Recreational Highways.

Byway Alliance Group Comments	WSDOT Responses
<p>Scenic System is defined by 3 points: a, b, and c. b and c refer to state highways outside the boundaries of incorporated cities.. Please explain and clarify this reference. Does this mean that byways are exclusive of cities and counties?</p>	<p>Done</p>
<p><i>4,006 miles of approximately 7,000 miles of state highways make up the S&R highway system and on page 7 it states that management plans ...have been completed for 2,900 of S&R highways.</i> Please clarify these numbers in the definitions noted above.</p>	<p>Not clear on what is being suggested. No specific wording provided.</p>
<p>The newly organized Washington Byway Alliance looks forward to increased and enhanced communication with WSDOT. This formal grassroots organization will enable individual byways to maintain a close working relationship with WSDOT.</p>	<p>Noted. May need some added information - What type of group is the Byway Alliance (ie – 501C3 other?)</p>
<p><i>WSDOT will commit one fulltime employee to provide technical assistance and help develop funding partnerships..</i> Please clarify the role of the Scenic Byway Coordinator position as it relates to serving byways, especially those that have 2008 and 2009 grants.</p>	<p>This may be most appropriately discussed in a different place than in the Scenic and Recreational Highways Plan.</p>
<p><i>In other states like Washington, the State Legislature nominates the roads.”</i> This is questioned because it implies there are no criteria or assessments for byway designation. It is our understanding that there has been a process implemented, but this may perhaps need to be formalized into a WAC. We would encourage a transparent system that is equitable and consistent. This should also include process and criteria for de-designation.</p>	<p>WSDOT and other state agency partners have a limited role in designation or de-designation of State Scenic and Recreational Highways. There may be some confusion here about the difference between <i>designation</i> of state scenic and rec. highways and <i>eligibility</i> to apply for federal grant funds.</p>
<p>Page 20, refers to a need to use new data and new technology to evaluate and confirm the original assessments and to strengthen the foundation of the Scenic System. This appears to open up byways for new evaluation in areas such as sustainability and stewardship. We would suggest that this be consistent with the federal byways program which evaluates Corridor Management Plans, Partnerships, visual quality, stewardship, intrinsic qualities etc...</p>	<p>There appears to be confusion between the state’s legal requirements and state goals and eligibility for federal grant funding. Background Paper #2 may help address these questions.</p>

Byway Alliance Group Comments	WSDOT Responses
<p>The Byway Resource Center is launching a new Economic Impact Evaluation Tool in December 2009. It is being made available for free to all byways. Although economic development has not been mentioned in this plan, it is a critical component of many byway programs. Many byways must indicate proof of their return on investments for obtaining funding. In addition, for many byways, capital project development is the number one goal and should also be considered in the plan.</p>	<p>Noted – need additional information about what is meant by capital project development</p>
<p>Additional comments includes the process used by WSDOT to prioritize grants. It is important to have an impartial committee selected with input from the WBA. We need to be assured of a transparent and equitable process, and published criteria for that process.</p>	<p>WSDOT will develop a process consistent with other federal programs we administer. Potential grant recipients/eligible applicants will not be involved in project selection processes to avoid conflict of interest.</p>
State Recreation and Conservation Office Comments	WSDOT Responses
<p>State and federal gas tax revenue slated for scenic and recreational highways should focus on:</p> <ul style="list-style-type: none"> --Infrastructure improvement for safe travel by all modes. Example goal: usable 3-foot minimum shoulders for bicycle tourists on 100% of the system. Safe crossing by bicycles on 100% of bridges – even if we have to suspend a bike bridge below the vehicle grade. -- Infrastructure maintenance/preservation. --Consistent signing. Maintain 100% of heritage markers. Bicycle highway route markers. --Protection of resources: fix 100% of high vehicle-wildlife collision areas (with elevated roadways or wildlife overpasses); fix 100% of culverts on salmon-bearing streams. 	<p>Noted</p>

WSDOT Public Transportation Division Comments	WSDOT Responses
<p>Thank you for the opportunity to review the internal draft. There has been a great deal of work put into this, and the foundation has been layed nicely to build upon.</p> <p>I especially liked how the incorporation of how other states manage their scenic byways is included. I believe that while WSDOT is innovative, we sometimes get too caught up in ourselves, if you know what I mean. Other states can offer us ideas, and like the way you have incorporated these into the document.</p> <p>I am very interested in how the program can develop stronger ties to the RTPOs and their planning efforts. I would have thought that since our planning office provides some oversight, that these byway plans would have been incorporated into their efforts. However, that still appears to be a link missing in the chain.</p> <p>The partnerships are key with this program. Not only with the regional partners, but also with internal partners within WSDOT. This is where this latest update effort can really strengthen the partnership aspect. Let's face it, funding is becoming very scarce in these times, and we all need to form and foster partnerships to make future projects come to fruition.</p>	<p>Noted.</p>
Association of Washington Counties/King County Comments	WSDOT Responses
<p>*Note – Comments provided in underline and overstrike Correction edits throughout.</p>	<p>Done</p>
<p>Clarify definitions of byway and scenic and recreational highway on throughout. Include examples of new data available on Page 6.</p>	<p>Done</p>
<p>Expand explanation of how roads become part of the Scenic and Recreational Highway System on Page 9.</p>	<p>Done – no specific wording provided</p>

Association of Washington Counties/King County Comments	WSDOT Responses
<p>Corridor management plans should certainly inform local/regional plans and vice versa. I am not sure at this point in the discussion that adoption is necessarily appropriate or beneficial. Let's keep exploring this. – Page 11</p>	<p>Consistent with Background Paper #1. Continued exploration is all that is suggested in Background Paper #1.</p>
<p>It would be helpful to explain what sort of research was done and why these particular examples were selected for inclusion in this paper. Are these included to just stimulate discussion and creative thinking? Or are these examples felt to have some specific applicability to WA state? – Page 14</p>	<p>See first paragraph on Page 14 - "While Washington's Scenic and Recreational Highways and the communities and byway interest groups that steward them are models for the nation, it can be informative to step outside the state and look at other examples. This section provides a few examples to stimulate discussion in three primary areas: tourism, stewardship and planning."</p>
<p>I don't think this idea [of coordinating Corridor Management Plans with Comp Plans and other required plans] has been explored enough yet to know whether these benefits would be realized. – Page 21</p>	<p>This discussion of coordination among plans funded by state and federal gas tax and other public funding is consistent with existing state laws that call for coordination among local, regional and state plans and policies.</p>
Washington State Parks Comments	WSDOT Responses
<p><u>Heritage Marker Program:</u> It would useful to identify and coordinate the maintenance and enhancement needs of the state-wide Highway Heritage Marker (HHM) program that relates to the Scenic and Recreation Highway program. There are several HHM sites that are part of the Scenic and Recreation system already; however, they are not currently linked to each other (at least from what I can tell).</p>	<p>Noted. Will work with Parks to include.</p>

Washington State Parks Comments	WSDOT Response
<p><u>Assessment:</u> It would be useful to identify what criteria or process would be used to represent the interpretive value or opportunity of index model inputs. Many referenced potential stewardship index inputs (e.g. Natural Area Preserves, Historic locations, etc.) can be compared and weighted in terms of scenic beauty or natural and cultural significance, but to the highway system user many of these attributes may be intangible. Some representation in the scoring and weighting of inputs within an assessment index should reflect the capacity to access and/or convey this value or meaning to the user through some form of media or other management tool, especially if a stewardship performance measures are desired?</p>	<p>Noted. Background Paper #2 will provide additional detail and opportunity to discuss and develop methods. WSDOT will attempt to take a first step in developing a stewardship index in this plan update and will continue to work with Parks and others to refine and develop it.</p>
<p><u>Design Standards:</u> Based on review of my HHM program files, it appears we do have a HHM interpretive sign design standard. It may be useful to address the development of design standards for interpretive media if that is not already being addressed.</p>	<p>Noted. Need specific language to include in draft plan.</p>
WSDOT Traffic Office Comments	WSDOT Response
<p>The Traffic Office has reviewed the Draft Background Paper #1 and we have the following comments: -- On page 11 - change the first question to read as follows: What does the law say about advertising signs visible to State Scenic and Recreational Highways? -- Under the same section change the third sentence to read - The legislation also controlled signs visible to 'scenic' state highway segments; these were highways passing through public parks, recreational areas, and national forest lands. -- Under the same change the fourth sentence to read - The original 'scenic' definition combined with highway segments that are declared to be scenic highways by the legislature (RCW 47.39) comprise the current definition of the State's Scenic System for the purpose of highway advertising control.</p>	<p>Done.</p>

Mountains to Sound Greenway Comments	WSDOT Response
I did notice a small error to correct for the next version. Page 14 under What We Can Learn From Other States 3 rd pp should say "country" not "county". Someone else will likely catch it if they haven't already but thought I'd write it in to be sure.	Done.
WSDOT Tribal Liaison Office Comments	WSDOT Response
*Note: Comments provided in underline and overstrike. Edits to pages 11-12.	Done.
Do you have to be a nationally designated scenic byway to receive federal funds?	No. Correction made.
US Forest Service	WSDOT Response
It seems that there is a need to take the existing State legislation and under it develop related Washington Administrative Code (WAC) or departmental policy that helps formalize how the State will use the FHWA National Scenic By Program to accomplish State Scenic and Recreational Highway System/Program goals and management. This plan needs to identify that the development of policy will be a priority action under the revised plan. This policy can help formalize what has been happening "informally" over many years. It can also establish the processes by which the overall Scenic and Recreational Highway Program (of which the byways are a part) will operate from here on out.	Noted. WSDOT will work with US Forest Service to incorporate suggestions into draft plan.
Oregon chose to establish them through the creation of Oregon Administrative Rules (like WAC's), but the wording and steps could be just as easily converted into administrative policy instead. I would strongly recommend that you consult with Pat Moran, ODOT Scenic Byways Program Manager.	Noted.
It still sounds like there is some very specific "housekeeping" legislation needed to make those sections of "byways" that are NOT currently legally designated in the SS&RHS, part of the system. This should also be identified as priority action in the revised plan.	Noted.
You mentioned that in addition to the approx \$15 million that has come to the SS&RHS through National Scenic Byway Program grants, there has also been a state investment of about \$9 million over the same period of time in these routes. Many may not know this. It points to the fact that there are a variety of tools at hand that may be applied to helping attain the goals of the SS&RHS and this plan needs to identify all of them.	Noted. WSDOT will incorporate this into draft plan.

Curt Warber Comments	WSDOT Responses
<p>In addition to stewardship, tourism, and planning we might want to consider education as a primary purpose of the byways. Although it may be included as an aspect of both stewardship and tourism, education may be an important enough purpose of most byways to be included as its own priority. Many byways have become organized and are pursuing projects with education as their primary goal-working to share the natural and cultural heritage of their landscape with the diverse audiences that use the highway for travel. And, of course, planning in and of itself can be a mixed blessing. What most byways are interested in is the hoped for outcome of planning – coordinated, effective action.</p>	<p>Noted. The Steering Committee voted to focus on Traveler Services/Tourism, Stewardship and Planning and Implementation at their last meeting.</p>
<p>This process could be a significant benefit for byways if the standards maintain enough flexibility for implementation. It will be a roadblock if the design guidelines significantly increase the cost of projects, don't allow enough flexibility for the astounding diversity of conditions on Washington's byways or become simply one more way to say no to a proposed project. There needs to be significant coordination between byway representatives, WSDOT design staff, federal agency representatives, and State Parks as this process continues.</p>	<p>It is outside the scope of this plan project to develop design guidelines.</p>
<p>As mentioned above, significantly increased state agency involvement in byways needs to be accompanied by increased agency resources. Assuming that WSDOT will remain the primary agency responsible for the byways program, there needs to be a strategy to increase the capacity of the agency to support byway groups. That could take the form of additional headquarters staff dedicated to the byways program or a new emphasis on the role of the regions in partnering for planning and implementation. One FTE may not be adequate to provide the level of service associated with changes to the program suggested in the Background Paper.</p>	<p>Outside the authority of WSDOT to impact this – no budget, federal or state requirements</p>
<p>The Byways strategic plan process [State Scenic and Recreational Highway Plan process] needs to engage local jurisdictions and the legislature to evaluate whether elected officials support a stronger regulatory aspect for the byways program.</p>	<p>There appears to be confusion about what Background Paper #1 says related to coordination of local, regional and state planning efforts. There is no recommendation, suggestion or discussion about Corridor Management Planning or plan development processes impacting local land use through regulation – unclear what specific language prompted this comment.</p>
<p>Regarding a Stewardship Index – This is an interesting model to pursue. Very complex to implement and manage, especially if the metrics implied in the stewardship index would ultimately be used to evaluate the success of byways or influence their ability to compete for funding.</p>	<p>There will be opportunity in Background Paper #2 to discuss this index and learn more about it.</p>

Department of Archeology and Historic Preservation Comments	WSDOT Responses
<p>I think the background paper #1 frames the issues and opportunities well. In my casual observations from driving around the state and observing the landscape, I often notice the gradual, incremental, but nevertheless tangible and rather alarming erosion of scenic qualities of scenic corridors from inappropriate design. Information in this paper that there is little if any connection between local comprehensive planning and corridor management planning is startling and that \$3 million has been devoted to developing the cmp's. To me this is really the heart of the matter for if there is not commitment to a scenic designation/corridor management planning from all the stakeholders, then I wonder why the State should even bother. Some issues I would like to see the planning process and the plan address are:</p> <ul style="list-style-type: none"> * re-evaluate existing designations and determine if the designations should be adjusted or de-designated. * tackle the issue of designated byways through urban areas...perhaps we should look at the Columbia River Gorge NSA as a model where designated "urban areas" are managed differently if at all. * We need to hear from local government representatives, the AWB, planners, property owners groups, and other land use decision makers about their perspective on the scenic highways, their vision for the corridors, and short/long-term management expectations. * Flesh-out the link(s) between the cmp's and other planning processes (i.e. local comprehensive plans, etc.) * Examine and revise if necessary the scenic highway designation process and de-designation process. * For designated corridors with a cmp, identify and implement incentives/dis-incentives for adhering/not adhering to the plan. * Articulate WSDOT's perspective on the program and its commitment to implement it and adhering to the cmp's. 	<p>Noted. WSDOT will work with DAHP to incorporate comments into draft plan.</p>

Other External Comments Received Via Website	WSDOT Responses
<p>My only comment is that I'm glad to see the direction laid out in the plan aligns nicely with the development and direction our byway is taking. Thanks for your efforts on this.</p>	<p>Noted.</p>
<p>To whom it may concern,</p> <p>I would like to express my opinion about the portion of the North Cascades Highway that is closed every winter. I encourage you to keep the highway open year round. This highway provides access from the west side of the state to the small tourist town of Winthrop, and the longer the highway remains open, the busier businesses in town remain. My husband and I own Trail's End Bookstore in Winthrop and we notice a significant drop in business the moment the highway closes for the season, and a big jump in sales when the highway opens again in the spring. Many businesses close their doors for the winter due to low volume of visitors. We have an active cross country ski industry here that could grow with increased access from the west side of Washington. The economy of our area would greatly improve if visitors had access through the North Cascades across Highway 20 year 'round.</p> <p>I have been to many parts of the country and the Cascades are by no means the snowiest. For instance I recently visited Colorado and the passes in that state are higher, snowier, steeper, and more slide-prone than our short section of highway that closes each year. If snow sheds were installed over the sections of road that are slide prone it would make it possible to plow and keep open our North Cascades Highway. By looking at other similar highways it can easily be observed that it is possible to keep the highway open during the winter.</p> <p>In my opinion Washington should install snow sheds and keep Highway 20 open year round.</p> <p>Thank you for your consideration.</p>	<p>Noted.</p>