California Historic Route 66

NEEDLES TO BARSTOW CORRIDOR MANAGEMENT PLAN

APPENDIX IV: PUBLIC COMMENTS ON DRAFT PLAN

MAY 2015

Bureau of Land Management
California Desert District

California
Historic Route 66
Association

APPENDICES

The following appendices provide background information in support of the plan. Appendices I and V are included in the print versions of the plan. Appendices II, III, and IV are available on line at the CHR66A website (http://cmp.route66ca.org).

Appendix I: Legislation and Route Description (included)
Appendix II: Maps (download at http://cmp.route66ca.org)

- Map 1: Corridor Route Location
- Map 2: Land Ownership
- Map 3: Historic Features (3 panels)
- Map 4: Natural Resources
- Map 5: Recreational Resources
- Map 6: Visual Resource Inventory
- Map 7: Transportation Diagrams (3 panels)

Appendix III: Inventory of Historic Resources (download at http://cmp.route66ca.org)
Appendix IV: Public Outreach (download at http://cmp.route66ca.org)
Appendix V: Implementation Table (download at http://cmp.route66ca.org)
Appendix VI: Bibliography (included)

Project Consulting Team:

Lardner/Klein Landscape Architects, PC	Jim Klein,*Project Manager, Byway Planner* Cara Smith, *Planning and research, GIS* Eric Childs, *Planning and research*
MIG, Inc.	Joan Chaplick, *Public Outreach* Dean Apostol, *Visual Resource Management*
Thomason And Associates	Phil Thomason, *Preservation* Andra Kowalczyk Martens, *Preservation*
National Trust for Historic Preservation	Carolyn Brackett, *Heritage Tourism, Marketing*

NOTE: Revisions requested between 4/3 and 4/17 are shown in blue. The Final Draft will be produced and ready for distribution by 4/30/15

	Pages	Para.	Specific Comment - change "this" to "that"	Response (to be filled in by LKLA team
1)	GEN (SBC)		This document contains numerous editorial inconsistencies. For example, NTH/Route 66 bridge totals between Needles and Barstow in Chapter 1 are stated incorrectly, whereas they are correctly stated in other chapters (i.e. Chapter 6: Visitor Safety and Roadway Experience). Similar errors are repeated throughout the document and need correcting as noted in the Chapter-Specific comments.	Will check for consistency and revise
2)	GEN (SBC)		Statements regarding the National Register eligibility of individual NTH/Route 66 features between Needles and Barstow are largely incorrect. They are based on a Caltrans approved draft of the Historic Property Survey Report for the Dola Ditch Bridge and Lanzit Ditch Bridge Replacement Project. The NRHP eligibility conclusions of this report were modified by subsequent SHPO review. Specifically, although Caltrans approved the October 7, 2014 Historic Property Survey Report for the Dola and Lanzit Bridge Replacement Project, the SHPO did not approve all of the recommendations and findings contained therein. By way of example, the November 25, 2014 California SHPO letter to Caltrans does not list all bridges as eligible, and it does not list all dikes, drainage ditches, etc. as eligible. The current text of the CMP implies that this is the case. This basic type of error applies throughout the text of the CMP, and DPW recommends correcting these errors as noted in Chapter-Specific comments.	*We based our statements regarding National Register eligibility on information provided by SBC on October 7, 2014. We did not receive the further revision from SHPO. Information we included in the draft was accurate based on information we were provided.* Will revise based upon updated information provided by SBC (copy of letter was not provided with comments, but will obtain); specific revisions noted in Comments 28 and 34)
3)	GEN (SBC)		The text of the DRECP is referred to throughout the CMP. The County comments regarding the DRECP will be communicated to Lardner/Klein so that issues such as (but not limited to) view shed exceptions for safety related maintenance of NTH/Route 66, are incorporated and allowed for with future MOU's or agreements. A County/Caltrans/SHPO Programmatic Agreement (PA) as already requested by SHPO prior to any future NTH bridge replacement project is underway. This Programmatic Agreement (PA) for NTH/Route 66 bridge replacement projects and long-term maintenance between Needles and Barstow is recommended to be signed by the County/DPW/Caltrans/SHPO/BLM as the primary 'stakeholders' in the NTH/Route 66 alignment. This PA shall be negotiated per the existing FHWA/Caltrans/SHPO Programmatic Agreement. All interested parties will be invited to review and comment on the PA drafted by the primary stakeholders.	Will update status of ongoing efforts to gain a Programmatic Agreement and note SBC need/desire for concurrence among stakeholders. DRECP comments are addressed in comments 29, 30, 33, 40, 41 and 43 *NOTE: throughout the document "Draft DRECP" will be changed to "Proposed DRECP"*

4)	GEN (SBC)		The Appendices do not appear as complete.	Appendix II (maps) and III (Inventory of Historic Resources are linked in the table of contents. The following updates are noted: One of the links to the transportation diagram maps did not work and it has been updated. Appendix IV (public outreach) is not complete as the process is ongoing, Outreach efforts related to the development of the draft are included in the CMP text. Outreach efforts documenting how the plan was finalized are in process and will be included as part of the final comments. Appendix V, Implementation Table was distributed 1-week prior to the web-meeting and will be revised with the changes to the plan.
5)	GEN (SBC)		Chapter 8 discussions regarding MOU and partnerships will be carefully considered and efforts to ensure ongoing operation, maintenance and repair/replacements are preserved.	Noted
6)	GEN (SBC)		Delete subjective comments and opinions regarding opinions on safety, road roughness, hazards, speeding, etc.	*Many stakeholder comments throughout the process reflected are the opinions of those who live along the route, drive it on a regular basis or who recorded observations during a recent bicycle ride.* ~~*These observations will be retained in the report and noted as stakeholder comments and observations.*~~ *Observations will be noted as the opinion of (insert name of group) and are not based on specific engineering studies.* *Observations about safety, speeding and hazards will be* ~~*addressed on a case-by-case basis where noted in the plan, and will be augmented by factual information, if available.*~~ *Referenced as opinions and not based upon actual engineering studies.* *Observations about the user characteristics of visitors that are traveling along Historic Route 66 (and in projecting to the future, that are likely to travel along this route) will be retained as based upon professional observations made by scenic byway planning experts throughout the country in similar planning efforts for more than two dozen heritage touring routes. These conditions were observed during travel along the corridor route as part of fieldwork conducted by the project team and are not based upon specific engineering studies.*
7)	Global		Refer to “American Indian”	Will change as noted
8)	noted		Various typographical errors: • P1, p2, last sentence: Route 66 in ~~the~~ 1926 • P7, p2, lands that can be seen from the route • P7, p2, Use of private lands in the corridor ~~are~~ is • P14, p1, U.S. Highway 66 for all ~~of~~ unincorporated areas. • P14,p2, first sentence: One important amendment	Will change as noted

			• P14, p2 last sentence: The county designat~~ed~~ion ~~scenic highways and~~ applies all applicable policies to development • P25, 4th bullet: "The architecture functioned at a scale which the passengers in fast moving vehicles could understand"? • P62, p color contra~~c~~st, • P62, p "Air Force's desire •	
9)			CHAPTER 1	
10)	1	Last line	UNDER INTRODUCTION and sub heading Purpose of the Plan: last paragraph last line I recommend adding 'Travel Associations'	Will change as noted
11)	4	2	Clarify - 400' Corridor Width Government lands only – Varies on private lands. This is currently granted by BLM in writing as a "maintenance corridor" only from ½ mile west of Mountain Springs Road to two miles east of Ludlow. No 400' wide right-of-way is currently granted by BLM in writing as a "maintenance corridor" on Government lands from two miles east of Ludlow to Daggett. Please clarify throughout the CMP.	Will change as noted
12)	4	#3	CORRIDOR WIDTH Insert the following text after paragraph 3. For the areas east of the Five Mile Road exit east of Needles, lands managed by BLM's Lake Havasu Field Office of the Colorado River District are excluded from the corridor. The continuity of the corridor with Arizona's Route 66, an All-American Road is maintained by along the Interstate 40 right-of-way which overlays the Historic Route 66 travel route in this section. A map of these lands is included in Appendix !,	Will change as noted
13)	5	2	Add the following sentence to the end of the paragraph: "This CMP focuses on new development and does not propose changes to ways in which Operation and Maintenance of existing utility facilities are regulated." Justification: Although our rights as current right of way holders and the existing laws and regulations will not change, our concern lies with the potential changes to the ways BLM subject matter experts could conduct the review process itself. The	Will change as noted

			scenic designation could result in excessive/inordinate conditions imposed by the BLM for routine Operation and Maintenance.	
14)			As noted in the Introduction to the Corridor Management Plan ("CMP"), the Federal Highway Administration's ("FHW A") National Scenic Byways Program Interim Policy Document identifies fourteen points that must be addressed in the CMP. Of specific concern to SCE, the discussion provided in the January 2015 draft does not adequately address at least two of the requirements: (5) A strategy describing how existing development might be enhanced and new development might be accommodated while still preserving the intrinsic qualities of the corridor. and (8) A plan to accommodate commerce while maintaining a safe and efficient level of highway service, including convenient user facilities SCE serves 1.4 million customers in southern California with safe, reliable, and affordable electricity. SCE has existing Utility Facilities' that parallel portions of the proposed Route 66 corridor. Maintenance of existing Utility Facilities is categorically exempt under CEQA and should remain so even if Route 66 becomes designated as a Scenic Highway. The loss of this exemption would be harmful to commerce and to providing affordable electricity to customers, including tourist facilities and historic properties in support of the visitor's experience of Route 66. To satisfy requirement 5 of the FHWA's Interim Policy Document, SCE recommends adding specific provisions to the CMP to preserve the categorical exemption/or maintenance o/Utility Facilities.	*The designation of Historic Route 66 as a National Scenic Byway is not regulatory. The only regulation that is required is the prohibition of new billboards (existing ordinances cover this issue).* *Also refer to Page 5 of the CMP, first full paragraph, states: "Designation as a National Scenic Byway or All-American Road will not impact the rights of current right-of-way holders. They will continue to be subject to all existing laws and regulations—the same ones that they must follow regardless if the route is designated as a National Scenic Byway or All-American Road."*
15)				
			CHAPTER 2	
16)	7	2	*"San Bernardino County is responsible for the maintenance of most of Route 66"* Revise to: "Route 66 is in the County of San Bernardino maintained road system(CMRS)"	Will change as noted
17)	13		"The Historic Route 66 corridor between the city limits of Needles and Barstow is entirely within San Bernardino County. San Bernardino County is responsible for the safety and maintenance of the road and 400-foot wide right-of-way associated with the decommissioned" - the 400' Corridor Width is on Government lands only – Varies on private lands. Please	Will change as noted

			clarify throughout the CMP. Replace with "The Historic Route 66 corridor between the city limits of Needles and Barstow is in the San Bernardino County maintained road system(CMRS)."	
18)	14	6	There are only 136 (not 158) bridges and culverts between Daggett and Mtn. Springs Road. Please clarify. The correct totals are: **BRIDGE/CULVERT TOTALS** Timber Trestle Bridges/Structures = 128 Reinforced Concrete Bridges = 4 Pipe Culverts = 3 Concrete Box = 1 Total NTH Bridges/Culverts = 136 **Note:** One of the above noted 128 timber trestle bridges is actually on Ludlow Road, an original portion of the U.S. Highway 66 alignment immediately to the west of Crucero Road. It is included herein as part of the historic CA Highway 66/NTH alignment otherwise recorded as CA-SBR-2910H (See Appendix B). In addition take out "A critical concern is safety of the 158 bridges"	Will change as noted
19)	15	1	There are 128 timber trestle bridges - not 127 as stated in the CMP (See above). The bridges were mostly constructed in the **1930s**. Please clarify.	Will change as noted
20)	15	2	Incorrect statement regarding integrity of bridges. The great majority of bridges were massively altered in the 1940s and 1950s with widening and paving, removal of majority of original guardrails, etc. They are, however, regarded as historic alterations by the California SHPO. They were almost all massively altered, and do not maintain a high level of integrity as stated in the CMP. Please clarify.	Will change note on historic integrity to reflect the California SHPO position as "historic alterations"
21)	15	4	Current costs are $116 million to repair/replace the bridges and an additional $15million to reconstruct the roadway, and not as currently stated in the CMP as $95 million. Please clarify.	Will change as noted
22)	15		*"The County has funding for replacing two of the bridges (Dola and Lanzit), but lacks financial resources to repair or replace the most structurally deficient, let alone the othersthat need*	Will change as noted

			repairing or replacing". Replace "funding" with "federal grants"	
23)	15		*"The County also lacks funding for resurfacing the road, which in many places between Ludlow and Newberry Springs, is very rough. Warning signs have been placed. San Bernardino County allocated approximately three million dollars (Fall 2014) to apply chip seal to this section of the route"*. Need to revise to: "The County lacks funding for resurfacing its roadways due to decline in gas tax and other transportation funding and must prioritize projects with its limited funds. Route 66, in many places between Ludlow and Newberry Springs, have "Rough Road ahead" warning signs that have been placed. The County continues to monitor the road surface and identify funds for maintenance projects in sections of the roadways. Periodic chip seals and resurfacing projects have occurred and will continue to occur as funding is identified based on overall County wide needs.	Will change as noted
24)	15		*Funding for environmental reviews also present a significant challenge for a phased approach. Some kind of programmatic agreement would be needed to facilitate the required environmental reviews in a coordinated fashion for a phased approach to work.* Revise to: Public Works is preparing a phased approach to replacing the bridges which includes programmatic environmental approvals to save review time and take advantage of economy of scale.	Will change as noted
			Chapter 3: Qualities of Historic Route 66	
25)	34	4	The earliest known automobile alignment in California between Needles and Barstow was first known as the Santa Fe-Grand Canyon-Needles Highway (1912-1914), and not as the Ocean-to-Ocean Highway as referred to in the CMP. It was then known as National Old Trails Road from 1914 to 1926. Please clarify. Also, Page 34 - NOTR predates the Lincoln Highway, and that might be mentioned here.	*The reference in the CMP is from Michael Cassity's Route 66 Historic Context, prepared for the NPS in 2004. On page 29 he states that "The National Old Trails Road Ocean-to-Ocean Highway Association, created in 1911, appears to have been a product of the efforts of the Missouri Old trails Association and the Santa Fe Old Trails Association which sought to promote the road through the center of that state that had been followed by western bound emigrants and traders in the nineteenth century, and since those trails connected to the southwest, the road would be national, rather than the jurisdiction of a single state."* *We are not aware of a reference to this section called the Santa Fe-*

				Grand Canyon-Needles Highway but that does not mean it was not called this at some point. If the commentor has a definitive reference for this we will make this change.
26)	34		Also, NOTR and railroad connections meant that the road and the railroad would play a minor role in the development of the National Park Service. Centennial of NPS is in 2016. The Harvey House, at least in Needles, made that a transportation hub for the early establishment of national parks and monuments in the SW.	Will add a sidebar to note the NPS link and the letter Documenting early NPS exploratory trips from Needles
27)	35		US 66 opens the door of opportunity before the Depression – might be mentioned and personalized through the Charles Schulz story? Although it may not fit yet in the "50 years before present" sense of history, the NASA work in the area will soon do so. Prototype Mars Rovers were tested, I believe, at Amboy Crater. Research into possible astrobiology analogues continues in the Mojave. This is an interesting bit of the story which shows the value of preserving wild spaces along the road, so it might be included. I can volunteer to get more precise information if you like.	Opportunities for discussion of these related themes will be added to Chapter 5, page 105
28)	43	4 and 5	**There is a major error here in stating what is eligible and/or not eligible for the National Register on Route 66.** Specifically, although Caltrans approved the October 7, 2014 *Historic Property Survey Report* for the Dola and Lanzit Bridge Replacement Project, the SHPO did not approve all of the recommendations and findings contained therein. The November 25, 2014 California SHPO letter to Caltrans does not list all bridges as eligible, and it does not list all dikes, drainage ditches, etc. as eligible. The current text of the CMP implies that this is the case. In realty the SHPO letter reads: Caltrans determined that California Highway 66 /National Trails Highway (NTH) (P-36-002910, CA-SBR-2910H), the segment of California US Highway 66/NTH from Daggett to Mountain Springs Road Exit on I-40, approximately 111 miles in length, is eligible for the National Register of Historic Places under Criteria A and C under of context Development of Route 66 in	This is quoted from the information previously provided to planning team by Roger Hatheway. Will make the changes as noted and per the most recent California SHPO letter noted and provided in the full SB County comments.

			California, with a period of significance of 1926-1974. Caltrans also found the following to be contributors to this historic property: • 1929-1931 to Present CA Highway 66/NTH Alignment – Daggett to Mountain Springs Road (111 miles)(current Route 66 alignment) • Original or 1926 to 1929-1931 US Highway 66 Alignments – Daggett to Mountain Springs Road (previous Route 66 Alignments) • The following 1929-1931 Bridges (A BRIDGE LIST IS ATTACHED) In addition to the contributing elements listed above, several road-related features along the 111-segment should be considered to be contributing elements on a case by case basis if they maintain sufficient integrity. These features were constructed either during the original construction of the present Route 66 (1929-31) or within its period of significance and are known to exist along the corridor. Individual locations of each feature, predominantly outside the current APE for this project, were not be pinpointed at this juncture: • 1929-1931 US Highway 66 Dikes • 1929-1931 US Highway 66 Drainage Ditches • 1929-1931 US Highway 66 R/W "C" Markers • Three 1957 Rest Areas/Roadside Rests (Mountain Springs, Danby, Hector) • Late-1950s "40 SBD" Paddleboards In addition Caltrans has determined that the following do not contribute: • 1929-1931 US Highway 66 Construction Roads • 1944-1953 US Highway 66 Detour Roads • Post-1974 CA Highway 66/NTH Paddleboards • Post-1974 Rock Art and Graffiti • The following 1929-1961 Bridges: The above official SHPO NRHP determinations need to be	

			clarified throughout the CMP.	
29)	62-64	Section: View shed Issues	Add a paragraph discussing existing non-historic infrastructure within the view shed. Include the following: "Utility infrastructure, including underground pipelines and above-ground metering stations, valve stations, and pipeline spans exist within the view shed. These facilities require regular maintenance. The Operation and Maintenance of existing utility structures, including temporary ground disturbance caused by repairing underground pipelines and above-ground facilities, will not be affected by the Route's designation." Justifications: There is no mention of non-renewable utilities in the view shed section. Although SoCalGas transmission pipelines are almost entirely underground, some facilities such as metering stations, valve stations, and pipeline spans require aboveground Operation and Maintenance activities. These facilities should be included as existing view shed considerations that won't be affected by the Route's potential designation.	Will change as noted referencing the presence of non-historic infrastructure within the viewshed. *And refer to Page 5 of the CMP, first full paragraph, states: "Designation as a National Scenic Byway or All-American Road will not impact the rights of current right-of-way holders. They will continue to be subject to all existing laws and regulations—the same ones that they must follow regardless if the route is designated as a National Scenic Byway or All-American Road."*
30)	62-64		View shed Issues: Planned quarry locations currently under negotiation (between BLM & County) as part of the DRECP for the future maintenance of CA Highway 66/NTH between Newberry Springs and the Mountain Springs Road Exit on the I-40 will have view shed issues. The County will forward the DRECP comments related to this issue for incorporation into the CMP. View shed exceptions for standard and safety related maintenance of NTH/Route 66 need to be incorporated. **Note:** View shed issues may cross-over into other maintenance practices, and it is also suggested that language be inserted into the CMP that allows "view shed" exceptions for standard and safety related maintenance of NTH/Route 66 (see also Stewardship & the DRECP below).	*Note language will be added to the statement on page 5 to include the following reference:* "This CMP focuses on new development and does not propose changes to ways in which the operation and maintenance of existing utility facilities and the maintenance and repair of the roadway are regulated." *The following text will be added to page 64 under additional viewshed issues.* San Bernardino County has identified specific locations for stockpiling, soil disposal and quarrying operations as needed for the future maintenance of Historic Route 66 between Newberry Springs and the Mountain Springs Road Exit of I-40. The requested locations are larger than 10 acres in size. San Bernardino County has noted in comments made as part of the DRECP , that locations larger than ten acres will be needed for the ongoing bridge replacement projects and continued maintenance of Historic Route 66 Viewshed issues associated with Route 66, among many other issues, need to be a factor in the decisions about planned stockpiling, soil disposal, and quarrying locations. Guidance for these types of issues is found on starting on page 82.

				Additional guidance addressing quarrying will be added to the end of page 82 as follows QUARRYING AND RELATED EXTRACTION ACTIVITIES San Bernardino County has identified the need for stockpiling, soil disposal and quarrying operations. From the perspective of maintaining the character defining features of Historic Route 66, efforts should be made to use existing quarries first, including those whose stone was used for original construction and later for road and bridge maintenance. Opportunities to utilize existing, already disturbed locations has additional advantages. New quarrying and disposal operations can be used to reclaim and reshape the landscape to reflect the general appearance of the natural landforms that existed before quarrying operations took place. Permitting for quarrying and disposal operations outside the original permit area could be considered as part of an overall operations plan, developed by a qualified reclamation designer, which results in the desired reclaimed condition. The value of the additional materials extracted beyond the original permit area can be utilized to offset any added cost for a more carefully orchestrated quarrying operation.
			Chapter 4: Stewardship	
31)	66-67		DRECP: **County/DPW approved language regarding the DRECP should be inserted in this Chapter under "DRECP" beginning on Page 75. (text attached)**	*Comments provided to the DRECP are noted and will be included in Appendix 4, with other comments.* *Please refer to Comment #29*
32)	67		Corridor-wide Issues - Concern expressed about potential impact of Cadiz Water Project on historic resources relative to the lowering of the water table as part of pumping water to Southern California (see full text in letter which is "secured and cannot be copied into this comment table - RiverAHA on RT66 Draft Plan 2015.pdf)	*This issue is beyond the scope of the CMP. The following will be added to the list of Corridor-wide Issues on page 67* • Concerns were expressed as part of the public outreach efforts for the project about the potential impact of groundwater withdrawals by the Cadiz Water Project on historic resources relative to the potential lowering of the water table. This issue is important, but beyond the scope of the CMP.

33)	68-70		Add a paragraph discussing infrastructure within roadway. Include the following: "Utility infrastructure, including underground pipelines and above- ground metering stations, valve stations, and pipeline spans exist within and adjacent to the roadway. These facilities require regular maintenance. The Operation and Maintenance of existing utility structures, including temporary ground disturbance caused by repairing underground pipelines and above-ground facilities, will not be affected by the Route's designation." Justification: There is no mention of non-renewable utilities in the Roadway. SoCalGas has two natural gas transmission pipelines that cross underneath the road at various points. Ongoing Operation and Maintenance of these pipelines may necessitate temporary impacts to the road surface. These Operation and Maintenance activities should be included as existing roadway consideration that won't be affected by the Route's designation.	Will change as noted adding the paragraph on page 70, as a new heading: *Infrastructure Considerations*
34)	68-70		Roadway Considerations: This section contains key language relevant to the future maintenance of NTH/Route 66. There are several errors and/or issues and concerns including: Roadway Considerations Bullet Point 1: All of the bridges between Daggett and Mountain Springs Road have already been formally evaluated for NRHP eligibility. Please clarify.	*These issues were identified at the start of the project – prior to the official evaluation. Will rewrite to say:* The Historic Route 66 alignment between Daggett and Mountain Springs Road is considered eligible for listing on the National Register. All of the bridges between Daggett and Mountain Springs Road have been formally evaluated for NRHP eligibility. Related roadside architectural features will need to be evaluated separately for eligibility.
35)	69-70	Bullet 2 and 3	Roadway Considerations Bullet Points 2 & 3: The California State Historic Building Code does not appear to apply in any way (pers. com. Caltrans PQS) whatsoever to federally funded bridge replacement projects, and not as stated in the CMP as "may not be clearly defined." Please clarify.	The California State Historic Building Code was identified by Gloria Scott as a **potential** tool at the start of the project. We recommend leaving it in the text as a potential tool. Will change the words "may not be clearly defined" to: "have been determined by CalTrans to be not applicable to federally funded bridge replacement projects"
36)	70		*Historic Route 66/National Trails Highway is used by the California Highway Patrol and by Caltrans as an alternate or emergency route when the I-40 is closed due to a crash or other maintenance needs, thus it retains an important emergency transportation function in addition to its historic, scenic, recreational, and local uses. The alignment has never been officially designated as an emergency route by the State of California despite repeated requests by San Bernardino County*	Will change as noted

			and, as such, it is not regarded as eligible for receipt of either federal or state funding targeted specifically for emergency detour routes. Revise to: Vehicles affected by sudden closures on the I-40 often divert onto Historic Route 66/National Trails Highway. The alignment has never been officially designated as an emergency route by the State of California and, as such, it is not regarded as eligible for receipt of either federal or state funding targeted specifically for emergency detour routes	
37)	72 – and referring to page 112-113	Figure 80	One concern that we have is the potential deterioration to the future viewscape of Route 66 south of the highway from Ludlow through Daggett. Much of this area is sloping terrain leading to the Daggett Ridge, the Newberry Mountains, the Rodman Mountains, or the more distant Lava Bed Mountains and Bullion Mountains. As much of the elevation south of Route 66 between Ludlow and Daggett is rising terrain, developments upon the terrain are more dominant and visible from greater distances. You are aware of the Active Towing's heavy truck wrecker service that was permitted operation directly across from the Bagdad Cafe. Well, this month we have had three continuous parcels close escrow just east of the Chrevon station on Route 66 in Newberry Springs. The plans appear to be for Bob's Towing to apply for a zoning change and a Conditional Use Permit for these parcels to also operate as a heavy truck wrecker service, truck impound, and wreckage storage yard. A third heavy wrecker service has also expressed interest in locating in Newberry Springs. Newberry Springs has only two practical areas for seeding commercial development to benefit from a Route 66 National Scenic Byway. The area near the Bagdad Cafe, that has now been tarnished by Active Towing, and the area near Deel's Plumbing that could be clouded by yet another heavy truck wrecker storage yard; with the possibly of yet another third service. The Newberry Springs Community Alliance is pro-business. Unfortunately, the county is allowing spot zoning for	*Will change VRM Class III to encompass the adjacent foothills to the south of Newberry Springs (revised figure 80, attached).* *Will add the following text to page 114, under level of care for resources:* 6.7 Work with property owners to preserve and enhance roadside character by best practices in community design and historic preservation to preserve, maintain and enhance the character defining features of existing communities (including both incorporated cities of Barstow and Needles, and the unincorporated communities of Goffs, Fenner, Essex, Danby, Chambless, Amby, Ludlow, Newberry Springs and Daggett). 6.8 Develop design guidelines for use by the rural communities noted top provide guidance, at a minimum, on the following issues and principles: • Building and yard placement: Buildings should be sited in the front of the lot facing Route 66 with parking and ancillary uses to the side or rear. • Architectural Design: Adapt, re-use, expand, or replace commercial structures in a manner that is sensitive to their historic character; small-scale commercial structures should reinforce the patterns established in Route 66's Heyday period in proportion, fenestration, material and color choices. • Roadway access: Driveway access should be the minimum necessary to achieve safe access and egress and no more. Due to the low volume of traffic on Historic Route 66, acceleration and deceleration lanes, if needed at all, should be the minimum length necessary for safety • Fencing and screening – should utilize materials that have minimal visual contrast and be attractive in and of themselves as part of the streetscape areas

			incompatible businesses contrary to the type of Route 66 heritage businesses that we would like to see established along the route. Trying to acquire investors to invest near an eye-sore wrecker storage yard just doesn't work. We are disappointed that the CMP Draft between Ludlow and Daggett downgrades the southern area to the level of a Visual Resource Management Class III category. We would prefer Class II. It is understood that the lower elevations of alluvium south of Route 66 are largely private through Newberry Springs and Daggett and that the VRM is applicable to public land planning. However, if a label is to be placed, to indicate the degree of desired conservation for future evaluation, it is desired that a stronger Class II be provided to assist in the preservation of the historical visual significance of the road.	• Lighting –should be full, cutoff fixtures to reduce light trespass and glare; light standards should minimize visual contrast with the community context • Signing: Use Route 66 Heyday era signing styles for capturing the character defining features of small-scale commercial buildings in rural areas (see Figures 1, 18, and 19 for examples) • Construction: minimize the footprint of construction vehicles and equipment storage by using areas that are already paved, or areas where the ground has already been extensively disturbed
38)	72		Change "30 mile radius" to "20 mile radius" Justification: As indicated on page 4, paragraph 4, the maximum corridor width of the view shed is limited to a 20 mile radius.	*Will add the twenty mile distance zone to the map (new Figure 80 attached) and change the note to read:* *NOTE: The viewshed model …* This analysis extended to a 30-mile distance. The corridor width is limited to 20-miles, the maximum distance at which a casual observer can discern the types of changes that may occur in the corridor (see page 4).
39)	74		*Support efforts by San Bernardino County to maintain and/or reconstruct bridges so that weight limitations do not further limit opportunities for heritage tourism-related businesses (e.g. tour buses and large recreational vehicles currently exceed the weight limits on some bridges).* Revise to "Focus Lobby and support efforts…".	Will change support to "Focus advocacy and support efforts"
40)	75		DRECP: This is a key section that is quite well written. **IT IS SUGGESTED, HOWEVER, THAT ALL OF THE COUNTY DPW DRECP REQUESTS SHOULD BE INSERTED HERE. EXISTING TEXT NEEDS TO BE MODIFIED TO ALSO REFLECT RECENT BLM ACKNOWLEDGEMENT OF DRECP COUNTY/BLM ROUTE 66 "PARTNERSHIP" NEXUS.** (see attached document)	*Comments provided to the DRECP by SBC are noted and will be included in Appendix 4, with other comments.* *Please refer to Comments #29 and #30* *The following sentence will be added after the first paragraph on page 76:* Extensive coordination efforts have been taking place between BLM and San Bernardino County regarding operational and maintenance

				considerations for Historic Route 66. The continuation of this ongoing partnership effort is fundamental to the effective stewardship of Historic Route 66.
41)	P76	DRECP reference	The draft CMP's discussion of the Desert Renewable Conservation Plan ("DRECP") (beginning on page 76) and the implications for Route 66 recommends that the draft DRECP should "recognize that views from Historic Route 66 should be identified as key views in any future assessment of visual impact associated with renewable energy development.,,2 The DRECP's goal to provide a landscape level approach to development of renewable energy and associated electrical transmission facilities in California's Mojave and Colorado/Sonoran desert regions while ensuring effective protection and conservation of the desert's natural resources would help California meet its renewable energy mandates and greenhouse gas ("GHG") reduction targets. Transmission of the renewable energy envisioned in the DRECP from the development focus areas to where it will be consumed is of essential importance to the Plan's successful implementation. If even a fraction of the 20,000 MW of new renewable generation is developed in the DRECP, by defInition, new transmission lines will be needed and would, where feasible, be sited near existing roads to reduce the potential environmental impacts. The proposed Route 66 corridor may include new transmission projects routes for development under the DRECP. The CMP for Route 66 as a Scenic Highway should not impose additional restrictions beyond the Conservation and Mitigation Actions already proposed by the DRECP. SCE's ability to build new transmission infrastructure as well as maintain and upgrade its existing infrastructure is critical to supporting the DRECP's objective.	*There is only one privately owned area south of Amboy that is identified as a future assessment area. Given the emphasis in the DRECP on areas to the west of Barstow for future renewable energy facilities, the language requested is not applicable to this section of Historic Route 66.* See comments #29 and #30
42)	77	4	Add the following sentences to the end of the paragraph: "Conservation of scenery within the landscape starts with the landscape character analysis as it currently exists. As such, this CMP focuses on new development and does not propose changes to the ways in which Operation and Maintenance of existing utility facilities are regulated. The BLM acknowledges that Operation and Maintenance of existing facilities will represent, at worst, a temporary visual impact within the view shed, but will not permanently impact the landscape" Justification: Although our rights as current right of way holders	So noted, see comments See comments See comments See comments #29 and #30 and #30 and #30 and #42

			and the existing laws and regulations will not change, our concern lies with the potential changes to the ways BLM subject matter experts could conduct the review process itself. The scenic designation could result in excessive/inordinate conditions imposed by the BLM for routine Operations and Maintenance activity.	
43)	79	BMP	The draft CMP provides guidance on design and best management practices for renewable energy projects (beginning on page 79). Several of the proposed guidelines to reduce visual contrast and impacts are not practical and may result in additional environmental impacts. For example, the guideline to keep towers and lines as far as possible from the road would create additional ground disturbance due to the need to create access roads necessary to construct, operate, maintain, refurbish, and other customary activities. This would result in greater environmental impacts and conflict directly with environmentally responsible transmission planning and the DRECP's goals to conserve and protect the environment, not to mention the inconsistency with "minimize roads and other support facilities". Similarly, the proposed guidance to use smaller H frame towers because they have lower visibility than lattice or monopole towers incorrectly presumes that H frame towers can provide the same physical support or meet the same design function. In addition, use of the colors in the BLM Environmental Color Chart may require structural and electrical testing to verify the color treatment meets SCE's standards for protective grounding and structural integrity.	*The design guidance incorporated into the CMP is a recommendation and not a decision. If new facilities are proposed they will continue to be evaluated using the same regulations, policies and procedures that are currently practiced. Facilities proposed for public lands are subject to NEPA. Facilities proposed for private lands are subject to zoning and other local land use policies. Viewshed impacts from Historic Route 66 would be just one of many factors that are evaluated as part of the decision-making process.* *All of the Best Management Practices referenced in this section are consistent with standard practices for permitting of projects on BLM and other federally managed lands (see sidebar resources on page 81 for examples of where these techniques have been utilized to reduce visual impacts).*
44)	82	Section: Transmission Lines and Towers	This section should specify it is only discussing electric transmission pipelines and not natural gas transmission pipelines, or include additional statements identifying the presence of mostly subsurface natural gas transmission pipelines, the Operation and Maintenance of which would not result in any permanent visual impacts.	See comments #29 and #30 The following section will be added at the of page 82: *Fluid Minerals* Existing subsurface natural gas transmission pipelines are found within the Historic Route 66 corridor. The designation of Historic Route 66 as a National Scenic Byway or All-American Road will not change existing right-of-way permits across federal lands. For new oil and gas projects, including transmission pipelines across BLM managed lands, best management practices (BMPs) are considered as part of existing BLM policies and procedures (see http://www.blm.gov/wo/st/en/prog/energy/oil_and_gas/best_management_practices/technical_information.html).

				The primary emphasis of the BMPs is t: • Minimize the contrast between new facilities and the existing landscape • Manage the visual resources as seen from key observation points that reflect viewer sensitivity to the resources • Reduce surface disturbance • Maximize other resource benefits
45)	89	2	Change: "The California State Parks Office of Historic Preservation (SHPO) staff…" to "The State Historic Preservation Officer (SHPO)…" Justification: The acronym "SHPO" refers to the State Historic Preservation Officer, not the Office of Historic Preservation (OHP).	Will refer to the office as "California State Parks Office of Historic Preservation (CSOHP)" and the "State Historic Preservation Officer (SHPO)"
46)	92		*Properties Recommended for National Register Individual Listing* Properties recommended for listing include: • Individual nomination for the Historic Route 66 Highway roadbed between Needles and Ludlow. This nomination would include the roadbed and associated bridges, guardrails, culverts and other associated features. Additional sections of roadbed may also be eligible in the area from Ludlow west to Barstow. However, the presence of Interstate 40 adjacent to the Historic Route 66 roadbed may disqualify this section. Delete "Roadbed" and change to "alignment"	Will change as noted
47)	100-101		The Caltrans "The Guidelines for Design and Management of Historic Roads is actually produced by NCHRP not Caltrans. Last section: It is recommended that Barstow, Needles, and San Bernardino County update their comprehensive plan to incorporate this manual to provide preservation solutions along Historic Route 66. Revise to: It is recommended that Barstow, Needles, and San Bernardino County review the NCHRP guidelines for potential solutions along Historic Route 66.	Will change as noted
			Chapter 5: Enhancing the Visitor Experience	
48)	Idea		What if we scheduled the Autry R66 at the museum next	The 90th anniversary of Route 66 will be identified as an opportunity to

			November with a major media roll-out as part of the overall activities to celebrate the 90th anniversary of Route 66, as well as encourage specific events/activities in the desert communities - Needles, Barstow, Victorville, etc. to complement whatever festivities the Association might do in the L.A. area?	the funding strategies on page 124.
49)	103		Interpretive Themes should include: From Trail to starship: Exploration and transportation along the Route66 Corridor."	A bullet point will be added as a suggestion. *The NASA Goldstone site offering tours is the best location to interpret the role of the Mojave Desert in space exploration. However, there is a strong need to stay focused on specific Historic Route 66 resources. The site and theme are important, but must fall into the category of a side trip that could be marketed as something nearby worth visiting.*
50)	103	3	Suggestion was made (telephone) of interest in installing a large "Route 66" sign on 'B' Hill, Barstow (similar in scale to "Hollywood" sign) and in developing Route 66 themed related business ventures.	The idea will be added as a suggestion to page 103.
51)	P104	2	Potential audiences – add geocachers as an audience	Will change as noted – to last bullet under Potential Audiences
52)	111-114	1	Subsection heading – redundant from subsection 5, flow is awkward	*Change subsection title to read and switch Section 6 with Section 7 in the layout to improve flow:* **"6. USE TECHNOLOGY TO HELP TELL THE STORIES"**
53)	P114	1	The Route 66 experience is about the feeling of the place that can only be captured by getting visitors out of their cars and into the landscape	*Add the following sentence as a new first sentence in the first paragraph:* The Route 66 experience is about the feeling of the place that can only be captured by getting visitors out of their cars and into the landscape
			Chapter 6: Visitor Safety and Roadway Experience	
54)	116		DPW (SBC) will review the guidelines for design and management of historic roads	Notes
55)	116	2	*Prioritize and phase bridge repair and replacement and roadway resurfacing needs and ~~aggressively~~ pursue funding for top priorities* • Designation of Historic Route 66 as an official emergency route could leverage additional funding for repairs and replacement of inadequate bridges. Please clarify. DPW is not clear if bridges have to be repaired	Need to note that "follow up study is needed to determine issues related to designating Historic Route 66 as an official emergency route."

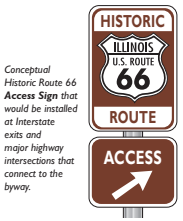
			before a route can be considered as an emergency route. • There is some concern that such a designation as an official emergency route would imply the requirement to use a higher level of design standards and guidelines for bridge widths, parapet walls, approach rails and other design elements. • ~~Enforce weight limits during an I-40 shutdown~~. Revise to: "ensure proper weight restriction posting are in place for enforcement requirements" • Phase repairs over time while maintaining access to communities and historic features of Historic Route 66 based upon priorities identified as part of San Bernardino County studies and plans. • Maintain adequate sight distances for desired pull-offs or wayside exhibits to safely tell the story of Historic Route 66.	Change other sentences as noted
56)	116		Use of chip seal as a pavement surface is cost effective but bicyclists complain that it is unsafe and damages bicycles. Revise to: "Use of chip seal is the most cost effective and preferred maintenance treatment. Evaluation of aggregate size along with the County's standard practice of applying a fog seal over the chip will provide a smoother surface for the bicycle users while providing the roadway preservation treatment".	Will change as noted – *however, the reference to bicyclist complaints needs to stay as that is a major concern expressed by stakeholder groups and there is strong interest bicycling on Route 66*
57)	117		Multiple properties along Historic Route 66 in Needles are threatened by I-40 interconnect project and the Section 106 work is inadequate to protect these resources (see full text in letter which is "secured and cannot be copied into this comment table - RiverAHA on RT66 Draft Plan 2015.pdf)	Add the following text to page 117 as a new strategy for Preserving and Maintaining Character Defining Features and renumber strategies that follow **1. ENSURING HISTORIC ROUTE 66 RESOURCES ARE ACCURATELY IDENTIFIED AND CONSIDERED IN FUTURE TRANSPORTATION AND LAND USE DECISION-MAKING** Vulnerable historic and archeological sites along Route 66 are not well-protected by standard Section 106 practices. Route 66 resources are not adequately inventoried and what is inventoried is found in multiple locations. A system is needed that can be easily accessed and utilized for project sponsors that identify Historic Route 66 resources so that local, state and federal governments have better access to this information when doing work within the identified Route 66 corrridor. The following steps are recommended 1.1. Establish a central repository for all Route 66 related resource

				inventories and seek funding in support of managing the inventory and monitoring Section 106 activities to ensure accurate information is considered 1.2. Transmit CMP-developed GIS data and inventory maps to the City of Needles, City of Barstow, San Bernardino County, CalTrans, and BLM to as an interim method to increase awareness of Historic Route 66 resources 1.3. Establish a method among regulatory agencies for adding new information to existing data bases and coordinating the delivery of that information to responsible agencies, utilizing the common date base transmitted and maintained in Strategies 1.1 and 1.2 1.4. Seek funding for more detailed resource inventories on an annual basis to support listing on state and national registers of historic places
58)	120	1	Andy Walters of CalTrans noted that the work on the MPDF and the preservation work associated with the bridges has been an ongoing partnership between CalTrans, SHPO, FHWA, and San Bernardino County among others.	*Add as last sentence of first paragraph* Fortunately, CalTrans, SHPO, FHWA, and San Bernardino County among others have maintained an ongoing partnership for the past three years to inventory historic resources associated with the 128 timber trestle bridges between Mountains Springs Road exit of I-40 and Ludlow. The results of this partnership have been an evaluation of the significance and the documentation of roadway related resources that are eligible for the National Register of Historic Places. Under this partnership effort, San Bernardino County has established context sensitive approaches to reconstructing two of the timber trestle bridges that are forming the basis for the needed Historic Presrevation Treatment Plan
59)	120	4	Document Historic Significance: DPW requests adding the *HPSR & HRER Dola and Lanzit Bridge Replacement Project.* This is a key document. DPW requests adding the November 25, 2014 California SHPO letter to Caltrans.	Will change as noted
60)	123		**ENHANCE:** applies to sections of Historic Route 66 where character-defining features are no longer present or where interpretive opportunities exist to tell the story of the route's development over time. The Secretary of Interior's Guidelines use the term "Reconstruction", but that is a term with different meaning in standard engineering practice. Using the same bridge example, if a timber trestle bridge had to be completely replaced due to structural failure, then the design of the new	Will change as noted

			bridge should reflect the traditional design in scale, proportion, and character, but the materials would be modern and up to current standards. A timber trestle bridge could also be replaced by a bridge with a similar method and means of construction, such as a timber trestle bridge kit, but may take on a different appearance. Revise underlined to: A timber trestle bridge could also be replaced by a bridge with a similar method and means of construction, such as a timber trestle bridge kit, but may take on a different appearance. In addition, concrete abutments, foundations and columns could be used depending on local conditions such as hydrology/hydraulics, but will utilize tinting, coloring, texture of timber to minimize impacts. *Agree On the Purpose and Need for Proposed Modification* In addition to major work on 128 timber trestle bridges noted above, most of remaining transportation-related work that will be implemented along Historic Route 66 will likely be resurfacing, restoration, and rehabilitation (3R) work. The purpose of 3R work is primarily to focus on preservation and extension of service life for existing facilities and on safety enhancements. Under the classification of 3R projects, the types of improvements to existing federal-aid highways include: resurfacing; pavement structural and joint repair; minor lane and shoulder widening; minor alterations to vertical grades and horizontal curves; bridge repair; and, removal or protection of roadside obstacles. Add" chipseals, striping and cleaning channels under bridges to the work options	
61)	125		Given very low traffic volumes and limited number of trucks, recreational vehicles and buses, there is no justification for increasing lane and bridge widths along Historic Route 66. New, reconstructed or rehabilitated timber trestle bridges should maintain the same widths and alignments as the approach roads. DPW requests that this is removed. DPW should be allowed to widen bridge widths to accommodate a shoulder (match approach shoulder width). This will also help bicyclists. Two	Will change as noted consistent with bicycle interests in shoulder use. Will state the importance of matching the lane and shoulder widths of the approach roads with the bridge lane and shoulder widths

			large trucks(or RV) that go by each other on a narrow bridge is not ideal.	
62)	125		road and shoulder width is based on engineering standards	Will note with above
63)	126		*Based on informal observations, there appear to be two types of drivers:* *regular travelers along the route(living or working) and visitors to the route, from both Southern California and from around the world. Regular drivers, most familiar with the route, tend to drive at operating speeds that far exceed the posted speed limit, especially along the long and straight stretches. Visitors, often unfamiliar with the route and communities, are traveling at the posted speed or less, especially in areas with historic features or other points of interest. This disparate rate of speed creates a conflict and safety concern.* Please delete entire paragraph. Informal observation and safety statements. *For discussion about the use of chipseal effect on bicycle safety, please see "Bicycle Compatibility with Chip Seal Surfaces" on page 129.* This needs to be deleted. DPW doesn't agree there is a safety issue with chip seal	*This statement is based upon experience in preparing similar plans for more than two dozen scenic and historic routes across the country. No statistics are kept but the behavior has been observed in each and every one of the more than two dozen that the lead consultant has been involved with.* ~~Suggest qualifying the statement as "based on observation and professional experience indicates that"~~ Rewrite paragraph as follows: *Based on informal observations by scenic byway planning team members (and not on actual engineering studies), there appear to be two types of drivers:* *regular travelers along the route (living or working) and visitors to the route (from both Southern California and from around the world).* ~~*Regular drivers, most familiar with the route, tend to drive at operating speeds that far exceed the posted speed limit , especially along the long and straight stretches.*~~ *Visitors, often unfamiliar with the route and communities, are traveling* ~~*at the posted speed or less*~~ *at a relatively slow rate of speed, especially in areas with historic features or other points of interest. Regular drivers are more concerned about getting from their origin to their destination and are traveling at a relatively higher rate of speed.* ~~*This disparate rate of speed creates a conflict and safety concern*~~ *On other byways and historic touring routes, the competing needs of drivers has become a management issue.* *For chip seal comment, see comment #67*
64)	126	5	Drainage: The CMP says these are significant engineering features. However, the drainage systems, per SHPO recommendation, have not yet been determined as eligible to the NRHP and need to be evaluated on a case-by-case basis. Please clarify.	*These are an integral part of the design of Route 66, and thus should be considered a significant* ***engineering*** *feature. No statement is being made here as to it being a significant historic site, although it's eligibility should be evaluated and considered.* Add "Eligibility for the National Register of Historic Places should be evaluated as a high priority"
65)	127		*San Bernardino County is considering two options for abutments: one concrete; and the other timber. The less costly concrete retrofit options should be considered for reinforcing the less visible parts on the underside of the bridge deck and abutments.*	Will change as noted

			Concrete tints should be used to better match desert soil color. Abutments can be made of concrete using formwork and tinting to provide the color and texture of timber. Cost savings can be applied to using higher quality preservation treatments on more visible portions. Add: foundation, columns, and deck after abutments	
66)	128	"Bicycle Use"	Add "The optimal road width for touring bicycling is 24' wide (two 12'-wide lanes), with 2' to 4' of paved shoulders on each side."	Will reference the preference of bicycle users
67)	129		*For discussion about the use of chipseal effect on bicycle safety, please see "Bicycle Compatibility with Chip Seal Surfaces" on page 129.* This needs to be deleted. DPW doesn't agree there is a safety issue with chip seal	*This statement is based upon direct observation and experience of bicyclists on Route 66. The sentence is just referencing the discussion on page 129. No change recommended* *See comments #68 and #69*
68)	129		chip seal size will be selected based on typical factors used by DPW such as traffic/truck volumes, available funding, aggregate availability etc.	Will reference selection factors, but add to the commenter's list, the need to consider bicycle use as another factor
69)	129		*Bicycle Compatibility with Chip Seal Surfaces* *Given low traffic volumes and limited funding available for routine resurfacing, it is highly likely that a chip seal surface will be utilized. Chip seals present a significant problem for bicycle use, possibly resulting in an unstable surface (especially for skinny-tire bikes), masking potholes and other hazards. When not sealed appropriately, loose aggregate can accumulate on the shoulder, forcing cyclists into the travel lane.* DPW disagrees with this statement. It is general and does not apply to this road. There are no shoulders the bikes can travel on. Potholes and cracks are always patched prior to chip. County uses a chip seal with a fog on top that provides a smoother surface with far less (if any) loose chips.	Will rewrite to more accurately reflect the bicycle issue on chip seal that apply to Route 66: "~~According to active and experienced bicycle users and bicycle user groups~~, Bicyclists have expressed their opinion on concerns with chip seals ~~present a significant problem for bicycle use~~. ~~When not sealed appropriately, loose aggregate can cause damage to bicycle tires and rims. In addition, loose aggregate can present hazards to safe bicycle operation when tires hit loose aggregate, especially large pieces."~~ San Bernardino County uses smaller chip rock (e.g.5/16"), additional sweeping, and application of a fog seal to improve roadway smoothness, remove excess chip rock and bind chips together to reduce future loose chips.
70)	130		Add photographs of wayfinding examples from other states on Route 66	Insert figures after 183 with two examples

				 *Conceptual Historic Route 66 **Access Sign** that would be installed at Interstate exits and major highway intersections that connect to the byway.* ***Standardized directional signs** to primary attractions. The design replicates the colors and Route 66 shield of the IDOT highway signs, which travelers are used to watching for.* (New Mexico)
71)	139	"Bicyclists	Add "The optimal road width for touring bicycling is 24' wide (two 12'-wide lanes), with 2' to 4' of paved shoulders on each side."	Will add statement about preference of bicycling community
72)			Roadway width of preferably 28' is needed for touring bicyclists who often travel at less than 20 mph and thus deserve sufficient space along the roadway edge so they do not impede faster and larger (especially commercial truck) traffic. See ACA's "Route Philosophy" at http://www.adventurecycling.org/default/assets/File/USBRS/USBRSCorridorCriteria.pdf	Noted above
73)			In reviewing the plan, we appreciate the consideration given to cyclists in the process of determining a road surface for the corridor. Indeed, inappropriately sized chip seal is dangerous to cyclists. Thank you for the recommended application of the finer 3/8" grade chips or smaller. Regarding your preferred 26' roadway width, we would suggest you consider a 28' width where possible. The additional 1' of shoulder on either side is a much more comfortable margin for bicycling. Normally, on a lower trafficked road such as is found in this corridor, we would not make this suggestion a priority. However, if this plan is successful, the volume of traffic is likely to increase. The increase will not only be single passenger vehicles but also tour busses and RVs, both very wide vehicles where more space for cyclists safety is important. I understand there is already some commercial traffic within the corridor and expect if conditions improve, this may increase as well.	As noted above

			We very much appreciate being a part of this process and look forward to it's successful implementation.	
			Chapter 6: Visitor Safety and Roadway Experience	
74)				
75)	112	After 5.9	Insert the following Identify opportunities for tribal partners to utilize Route 66 as a way to introduce stories of the American Indian in the Mojave Desert	Will change as noted and add the following sidebar **American Indians and Route 66** ***A project of the American Indian Alaska Native Tourism Association*** Route 66 played a major role in the history of the United States. It's been called *"America's Main Street"* and *"The Mother Road;"* and, it continues to draw the adventurous motorist. While images of American Indians were often used by businesses along the Route to entice travelers west, very little about the historic and cultural relationship between the Tribes and Route 66 is available. AIANTA's American Indians and Route 66 project will correct that omission and develop interpretation, publications and a destination website to provide educational and promotional opportunities previously unavailable to the tribes and other businesses. There have been two studies on this subject *"Documenting the American Indian Experience of Route 66,"* (2005) and an ethnographic study called *"Route 66 Native Americans,"* (2009). Both cover only a portion of Route 66, limiting the number of tribes addressed; and both relied heavily on literature rather than obtaining participation from all relevant tribes. AIANTA proposes to help tribes tell their stories and become part of today's Route 66. The project will create publications and develop oral histories telling the stories of Indian Country from the Tribal perspective before Route 66, how it has changed for each of the Native Nations along the Route and what there is to see and do today. *Source: http://aianta.org/aianta-projects.aspx*
			Chapter 7: Marketing	
76)	GEN		1. Marketing Goal: perhaps it should be MISSION GOAL	*This is a different meaning – no change recommended. A mission statement typically applies to an entire organization or an entire effort – such as the Mission of the California Historic Route 66 Association is dedicated to the preservation, promotion and enjoyment of Historic Route 66 in California*

77)	GEN		2. Travel Segment: Travel Segments actually refers to a portion of an airline itinerary. Perhaps uses 'Target Audience' instead as the definition infers more to describing social graphics targets which market communications are designed and directed too. Also possibly consider moving box to page 137	Global change: "travel ~~segment~~ audience" *The sidebar definition of travel audience (formerly segment) is located proximate to the first reference*
78)	133		1. **P. 133: Marketing Goal:** perhaps it should be called MISSION GOAL: Than have a small window[box] stating what "that message (mission)" is. IE: Something to the effect: **'focusing on historic cultural and environmental resources unique to Rte 66 inter-connecting the road and surrounding attractions thru these measures; CA Historic RTE 66 will become the centerpiece of destination and positioned to be 'top of mind' for all types of travelers''.**	*See Comment #76* *Add the following text as the last sentence of the 4th paragraph, page 133 to reflect the nature of the comment:* "Strategies are needed to take advantage of the unique, cultural and natural qualities of Historic Route 66 through the Mojave Desert and position Historic Route 66 as the centerpiece travel destination for all types of travelers."
79)	134-135		**2. Under Opportunities/Expand mkt....think about inserting 'after more visitor'** for "example through Escorted tours and Tour Operators"	Add third bullet on page 135 under opportunities: • Currently there are few, if any, options available for guided tours. Opportunities exist for developing new guided tours by preparing packages and training opportunities for tour operators, step-on guides and educational travel groups.
80)	135	1	change last line to read: 'A cross utilization of travel industry' partners will need....OR 'Travel industry' partners will need....	Change last line to read: "Travel industry partners will need to gather and make information available in a consistent manner that makes it easy for visitors to find what they need to know to plan a trip."
81)	135-136		Break out **International visitors from California Travelers:** Intl deserves its own division because it is so **powerful** in tourism dollars! AND for the below stat reasons NOTE: (stats taken from Visit CA Webpage): IN **2013** * 15.6 Million INTL travelers to CA * 6.6 million were of oversea origin * TOTAL direct spending in CA was $109.6 Billion (very nice) this created 965,800 JOBS *TRAVEL Spending generated 2.8B in Local Taxes 4.3.B in STATE TAXES *Top Oversea Markets: China, UK,Australia, Japan, German, SKorea, France, Scandinavia, India *CA was destination for 227.2M domestic per person trips **Under CA Traveler:** Again take out bullet areas which reference "INTL travelers and utilize under a Intl travel section.	*Separate section for international travelers to read (bullet points 5 and 8)* **"INTERNATIONAL VISITORS TO CALIFORNIA** • International visitation is increasing with visitors from Mexico, Canada, China, U.K., Australia, Japan, Germany, South Korea, France, Scandanavia, India and Brazil. • In 2013 there were 15.6 million international travelers to California; 6.6 million were of overseas origin. • International travel is forecasted to grow 4-5 percent annually through 2017. • Total direct spending in California was $109.6 billion, creating 965,800 jobs. • Travel spending generated $2.8 billion in local taxes and 4.3 billion in state taxes ** Source: "Insights and Planning Research: October 2014," Dean Runyan Associates, D.K. Shifflet & Associates, U.S. Department of Commerce, CIC Research Inc., TNS Travels America, Tourism*

				Economics, Smith Travel Research, Rakuten Research for Visit California
82)	136		Under Cultural Heritage: this paragraph doesn't address "culture" it addresses history, tour explore, scenic drive but not really **'culture'** as in customs, influences of food, language, etc. Perhaps that paragraph needs to refer to those verbiages.	*Insert the following sentence at the start of the section:* According to the U.S. Department of Commerce, Office of Travel and Tourism Industries: A cultural-heritage traveler is defined as having participated in one or more of the following activities: art gallery/museum, concert/play/ musical, cultural heritage sites, ethnic heritage sites, American Indian community, historical places, and national parks. *Agree that "cultural" heritage traveler has multiple connotations but need to be consistent with the survey source of "cultural heritage travelers".*
83)			**7. P. 138:** Add NATIVE AMERICANS (this is a critical change as it is been mentioned in other pieces of the plan and NATIVE AMERICANS are apart of the CULTURE. In my opinion they should be first on that list!	*Add the following section:* **AMERICAN INDIAN TOURISM MARKETS** There is strong interest along Route 66 nationally by American Indians wanting to tell their story in places where that story can best be told. Route 66 presents an outstanding opportunity to attract travelers with an interest in American Indian history and culture as told by American Indians. The American Indian and Route 66 project of the American Indian and Native American Tourism Association (AIANTA) is the best opportunity available to partner with tribal organizations to better capture this market potential.
84)	137		California **Travel Segment:** Travel Segments actually refers to a portion of an airline itinerary and reads as a mixed message of potential confusion. Perhaps uses 'Target Audience' instead as the definition which infers more to describing 'social graphics targets which market communications are designed and directed too'. Also possibly consider moving box to page 137 **Under Families**: doesn't have much accreditation because of the way it is worded especially the last line **Under California travel segment** (this implies region localities and NOT specialized interest groups which goes on to define those specialized interes groups **Under International travel-Recommend:** This 'section' or 'group' is projected..... **Under Recreational traveler-Recommend:** Use verbiage OHV, Hiking, Camping, Biking somewhere in that paragraph. The	Make the following changes under noted travel audiences: *For travel segment comments – see comment #77* *Families comment – not clear what change is recommended – statement simply identifies family travelers as a potential audience* *California Travel Segment comment – the specialized groups noted reflect California audiences* *For international travel comment – this statement reflects the audience of international travelers visiting California, see comment #81*

			cultural heritage travel can also be 'leisure' traveler	**Recreational travelers** – Change to read: Cultural heritage travelers can also be recreational travelers with 76% saying they like to take trips that offer a wide variety of activities including culture and nature. Recreation can encompass activities such as hiking, camping and biking. California's visitor research shows that 21.7% of travelers to the state enjoy outdoor recreation activities on their trips.
85)	145	top	Insert the following prior to Chamber of Commerce: American Indian Alaska Native Tourism Association (AINTA) AIANTA's mission is, to advance Indian Country tourism. According to its web site (http://www.aianta.org), AIANTA serves as the liaison between Indian Country and governmental and private entities for the development, growth, and sustenance of Indian Country tourism. AIANTA helps tribes build for their future while sustaining and strengthening their cultural legacies..AINTA has initiated its "American Indians and Route 66 project" designed to "create publications and develop oral histories telling the stories of Indian Country from the Tribal perspective before Route 66, how it has changed for each of the Native Nations along the Route and what there is to see and do today."	Change noted at web meeting and will be made in final draft
			Chapter 8: Implementation	
86)	P164		Alf's Blacksmith Shop, Stone Hotel, Motel adjacent to Bagdad Café and Carty's Camp be noted as a high priority for immediate preservation action	Add the following subsection to the list of Establishment Phase Actions: **HIGH PRIORITY PRESERVATION ACTIONS** Pursue immediate funding and preservations action as needed to stabilize and protect from demolition the following high priority historic sites: • Alf's Blacksmith Shop, Daggett • Stone Hotel, Daggett • Motel adjacent to Bagdad Café, Daggett • Carty's Camp, Daggett
87)	P166	Figure 206	Replace with new figure (attached)	*Change noted at 2-19 web meeting and incorporated into final draft*
88)		SBC	Policy Comments to be provided at a later date	Noted
			Appendices	

89)	A!		**Note:** NTH from Crucero Road (Ludlow) to the Lavic Road Overpass is not Original Route 66. I recommend that this be clarified.	Will make the note in the chart
90)	App-V	5.5	Might specify university partnership. Deirdre=Clemente's Public History Class is doing much fine work in the area; Dr. Clemente is top talent. So maybe mention that class, or at least UNLV as one of the university partners? Also consider Community Colleges which have strong academic foci. Also, include private for-°©-profit individuals supporting this effort? Like Joe Jones In Needles who is funding some of the Schulz displays? Key words should include sections on **education, and interpretation**, and research.	Will add in UNLV class
91)	App-V		http://arts.gov/grants-organizations/challenge-america/grant-program-description Perhaps money to install exhibits from Autrey in Needles or Barstow?	Will add under implementation as a priority
92)	App-V		Under Potential Partners associated items 1.2 and 1.4, list Needles and Barstow or any of the community local governments as potential partners (see RiverAHA on RT66 Draft Plan 2015.pdf)	Will add as noted

County of San Bernardino Position Paper on the Draft Desert Renewable Energy Conservation Plan
12 February 2015 G-1

Appendix G. County Positions Regarding Future Cost-Effective Maintenance of California Highway 66/NTH

General position:

California Highway 66/NTH should be specifically referenced in the DRECP with regards to future environmental practices and roadway repairs and maintenance. The general historical importance of California Highway Route 66/NTH, including scenic vistas as seen from California Highway Route 66/NTH and/or recreation areas accessible from California Highway Route 66/NTH are mentioned, but specific environmental requirements are not referenced.

Specific positions:

· Various stockpile, soil disposal and quarry locations should be granted by BLM to the County for the future maintenance of California Highway 66/NTH between Newberry Springs and the Mountain Springs Road Exit on the I-40. Without these locations, the future maintenance of California Highway 66/NTH will be cost prohibitive. The County has already provided the proposed locations to BLM.

· Suitable lands for mitigation should be set-aside in the DRECP, creating a land "Conservation Bank" that the County can draw upon as needed for biological and other mitigation purposes specifically related to the maintenance of and/or bridge replacement projects at any location along the California Highway 66/NTH in the County.

· Existing right-of-way authorizations from the BLM should remain "in force" should the DRECP be implemented, and additional and similar right-of-way linear authorizations should be granted should they exist.

· The DRECP should authorize maintenance as necessary of various appurtenant features outside of the existing authorized BLM right-of-way, if it is determined that without such maintenance, the historic nature and quality of California Highway 66/NTH would be compromised.

The current language within DRECP Appendix E: "Conservation and Management Actions, including Allowable Uses and Restrictions", has several statements which may preclude the County from performing the activities it needs to keep the California Highway 66/NTH operational. For example:
(a) It states in general that mining, including sand and gravel mineral exploration is incompatible if larger than 10 acres of ground disturbance.
As proposed by the County, every stockpile, soil disposal and quarry location needed for the future maintenance of California Highway 66/NTH, is larger than 10 acres in size. As such, the current language may prevent the granting of these properties, which will make the ongoing bridge replacement projects and continued maintenance of California Highway 66/NTH cost prohibitive. County of San Bernardino Position Paper on the Draft Desert Renewable Energy Conservation Plan
12 February 2015 G-2

(b) It states that for above-ground linear rights-of-way and maintenance roads, permitting agencies will base mitigation/conservation requirements on a 0.5 mile wide area centered on the disturbance footprint.

The County will likely be replacing over 120 aging bridges on California Highway 66/NTH in the next 25 years and restoring as much as 200 linear miles of drainage ditch and dikes. It appears that based on this language, the compensation related to this activity will be substantial and cost prohibitive.

(c) It states that maintenance or improvement of existing roads (e.g. highway widening) may be compatible within existing ROWs pending project-specific analysis."

This may have the potential to impact the current BLM right-of-way authorization to perform maintenance within the existing 400' wide corridor from Mountain Springs Road to Ludlow. The DRECP should recognize the existing BLM authorization as well as the linear extension of those authorizations for County's ability to maintain various California Highway 66/NTH appurtenant features outside of the current right-of-way, its ongoing bridge replacement projects, and continued of maintenance of California Highway 66/NTH.

California Historic Route 66 Needles to Barstow Corridor Management Plan (CMP)

County of San Bernardino Department of Land Use Services Staff Comments and Recommendations

Acknowledgements

Christney Barilla, County of San Bernardino Land Use Services

Terri Rahhal, County of San Bernardino, Land Use Services

B7259 4/13/2015 8:16 AM
Deleted: Christine

B7259 4/13/2015 8:18 AM
Deleted: Land Services San Bernardino County

Please provide this comment from the County where it will be appropriate.

"The County of San Bernardino wants to be a partner in supporting the culture of Route 66 and the Corridor Management Plan, although not to the detriment of economic development and mining."

Chapter 1, pg. 3 - #10

(10) A demonstration of compliance with all existing local, State, and Federal laws on the control of outdoor advertising. *"Designation of Route 66 as a County Scenic Route" on page 14, "City of Needles" on page 15 and "City of Barstow" on page 16*

B7259 4/10/2015 10:07 AM
Deleted: *Highway*

Chapter 1, pg. 4 - para. 4

CORRIDOR WIDTH

The corridor is defined as the lands visible from the travel route— referred to as the viewshed. The purpose of including the broader viewshed within the purview of the CMP is to identify those lands and features that shape the travel experience and provide the context for Route 66 as a nationally and internationally significant historic resource. Figure 9 illustrates the viewshed concept and identifies lands that can be seen 30-miles from the route, which formed the starting point for determining the corridor width.

According to FHWA guidance, the CMP must demonstrate how changes to the travel experience will be managed in a positive way. The primary type of changes that may occur within the viewshed are associated with utility scale renewable energy facilities. Chapter 4 documents research indicating that the maximum distance these facilities can be discerned by the casual observer is twenty miles. Chapter 4 also provides suggested guidelines for development. Therefore, the maximum corridor width is limited to twenty miles.

Lands within the corridor are owned or managed by both private entities and public agencies as shown on Figure 10. BLM is the primary federal land management agency along with the Department of Defense (DoD) and the National Park Service (NPS). Private lands are regulated by San Bernardino County. No change in the regulatory authority of either public or private lands will result from designation as a National Scenic Byway or All-American Road.

Chapter 2, Pg. 14, para. 2

In addition, San Bernardino County is responsible for guiding land use decisions for all private lands within the unincorporated areas. The General Plan was adopted in 2007 and amended periodically thereafter. The County is presently beginning to update the general plan.

Designation of Route 66 as a County Scenic Route

One import amendment to the 2007 General Plan regarding Route 66 is that it was designated as a County Scenic Route as of May 22, 2012. The amendment reads, "from Oro Grande northeast and east to the Arizona state line, excepting those areas with incorporated cities." According to the County General Plan a "scenic route" is a roadway that has scenic vistas and other scenic and aesthetic qualities that over time have been found to add beauty to the County. The County designated scenic routes and applies all applicable policies to development on these routes.

B7259 4/10/2015 11:02 AM
Deleted: *Highway*

B7259 4/10/2015 10:50 AM
Deleted: Highway

B7259 4/10/2015 10:43 AM
Deleted: highways

New billboards are therefore prohibited along Historic Route 66 within the unincorporated areas of the County by **§ 83.13.060** of its Code of Ordinances in paragraph (a)(5).

Renewable Energy Development

San Bernardino County also adopted a new commercial solar development ordinance in December of 2013 that requires the Planning Commission to determine that:

> *"the location of the proposed commercial solar energy facility is appropriate in relation to the desirability and future development of communities, neighborhoods, and rural residential uses, and will not lead to loss of the scenic desert qualities that are key to maintaining a vibrant desert tourist economy by making each of the findings of fact in subdivision (c)"*[5]

The findings of fact go on to provide guidance for the siting and design of commercial solar facilities generally addressing the need for the facility "to be unobtrusive and to not detract from the natural features, open space and visual qualities of the area as viewed from communities, rural residential uses, and major roadways and highways."[6]

[6] http://www.sbcounty.gov/uploads/lus/renewable/solarordinance121713.pdf

Chapter 3 Intrinsic Qualities, pg. 59

Newberry Springs to Daggett and Barstow

From Newberry Springs west to Daggett, the viewshed is much more developed, especially north of Historic Route 66. There is a scattering of rural housing, the railroad, the air base, a large solar energy facility, and other development in the foreground and middleground, especially to the north. The south is less developed, but I-40 is very visible and co-dominant with natural features like the Newberry Mountains. The Calico Mountains restrict views to the north and form a backdrop for Daggett. Development becomes more apparent between Daggett and Barstow. A highly developed transmission line corridor crosses Historic Route 66 east of Daggett forming a distinct transition between the less developed rural areas to the east and the more urban areas to the west.

Chapter 3, pg. 59, para. 2

ROUTE 66 VIEWSHED SEGMENTS

The Historic Route 66 corridor is defined to include the lands that can be seen from the route (its viewshed formed by the distant mountains) as shown on page 5. A computer analysis shows that the viewshed of Historic Route 66 extends many miles into the distance, especially to the north. The corridor has been defined to include those lands within 20 miles of the road, because at a distance greater than 20 miles it is difficult for a person to notice changes. In addition to the width of the corridor, the "viewshed" of Route 66 was organized into distinct "landscape units" reflecting areas that are perceived as a whole - similar to what you would sense as a large outdoor room. Given the vastness of the landscape's scale through the Mojave Desert, the landscape units are also vast. Descriptions of the landscape units that follow are from east to west.

Chapter 3 pg. 62-65

VIEWSHED ISSUES

There is little development activity within the viewshed of Historic Route 66 that is a threat to scenic resources. A major concern is the potential for visual intrusions associated with poorly sited renewable energy development and transmission lines.

user 4/12/2015 9:50 AM
Deleted: The main

Renewable energy development on federal lands across the western United States is proceeding at a fairly rapid pace. The Federal government has created several initiatives that promote and manage this development as part of the larger effort to reduce carbon emissions and lessen the risk of climate change. BLM has completed two programmatic environmental impact statements to identify lands where solar and wind energy could be permitted, and a number of potential energy transmission corridors have been identified. Multi-purpose transmission corridors have been identified along I-15 and I-40. These could include pipelines and/or above ground transmission facilities.

. . .

"Variance areas" (brown areas, Figure 65 on page 63) will be those not designated either for conservation or development, if the Final DRECP participants approve of the designation. Energy development could be proposed in variance areas, but may be expensive to pursue. Scenic resource impacts would be considered as part of the project review. The expectation and suggested approach for the approving entities is that energy developers will work in the focus areas until these are fully used before they pursue projects elsewhere. The area just south of Amboy and Chambless is one of the variance areas that may be an issue in relation to Historic Route 66.

B7259 4/10/2015 2:15 PM
Deleted: and uncertain with respect to approval.

Questions remain about how BLM will designate VRM levels for the Route 66 viewshed. This may be done through the DRECP, but the mechanism is not clear as of the draft CMP release (January 2008).

Additional Viewshed Issues

While most of the land within the Route 66 viewshed, especially east of Newberry Springs is in federal ownership, there are state and private in holdings, some of which (south of Amboy and Cadiz) are significant in size. Energy or other projects proposed for these lands are subject to San Bernardino County and CEQA rules and review. Energy development on these lands would likely require aboveground transmission lines across BLM administered lands, and thus could fall under NEPA rules as well.

Near Newberry Springs and Daggett private land ownership is much greater and is often part of checkerboard ownerships with other public and private lands. Renewable energy projects have been proposed for this area, including Soltech Solar (14 acres) and Silver Valley (100 acres) both near Newberry Springs.

In December 2013 San Bernardino County passed a solar energy development ordinance that includes consideration of impacts to scenic, cultural, and historic resources and affirms their importance.

Chapter 4, Pg. 65

Stewardship

The purpose of this chapter is to document the broad range of existing programs that are available to help preserve and maintain the intrinsic qualities of Historic Route 66 and priorities for implementing those conservation and preservation measures. Chapter 4 recommends strategies for managing the potential effects of intrusions to the authentic travel experience documented in Chapter 3, especially focusing on utility-scale renewable energy development and the need to preserve remaining roadside historic features "The County of San Bernardino wants to be a partner in supporting the culture of Route 66 and the Corridor Management Plan, although not to the detriment of economic development and mining."

As Historic Route 66 preservation efforts have evolved over the last several decades, they have been facilitated and supported by several public actions that impact corridor management across the Mojave Desert:

- The California Legislature designated Route 66 in California as "Historic Highway Route 66" in 1991.
- Congress passed Public Law 106-45 to preserve the cultural resources of the Historic Route 66 corridor.
- San Bernardino County designated Historic Route 66 (National Trails Highway or Main Street) from Oro Grande northeast and east to the Arizona state line, excepting those areas within incorporated cities, as a County Scenic Route.
- The alignment of Historic Route 66 from Daggett to Mountain Springs Road is considered to be eligible for listing on the National Register of Historic Places.

Chapter 4, Pg. 66

- As part of the DRECP, BLM will adopt Visual Resource Management (VRM) objectives that will establish four levels of scenic protection. These VRM classification levels, VRM Class I to VRM Class IV, correspond to distinct levels of scenic significance. They give the BLM an important management tool in conserving scenic and historic values associated with lands not protected by legislation or other means. Other supportive tools BLM uses to protect the landscape includes delineating areas as No Surface Occupancy (NSO), Controlled Surface Use (CSU), Exclusion Areas, and Avoidance Areas that can add increased protection when used in combination with more protective VRM Class designations.
- In areas within the viewshed of Historic Route 66 where the DRECP will encourage the future siting of renewable energy projects (Draft under review), design guidance may be needed to reduce potential visual contrast and impacts to scenery.

B7259 4/10/2015 2:42 PM
Deleted: will

- High-voltage electric transmission line corridors (either the expansion of existing or the introduction of new corridors in designated areas) represent a significant level of change that may have significant negative impact on the Historic Route 66 context.
- Existing off-premise sign (billboard) regulations for San Bernardino County and the City of Needles provide the necessary controls to meet the requirements of National Scenic Byway designation. The City of Barstow allows off-premise signs for four types of commercial and manufacturing zoning districts. However, existing City of Barstow ordinances limit off premise signs to 600' apart and only on vacant and undeveloped parcels. There are very few locations in Barstow where new billboards can be installed.

Chapter 4, Pg 71 - 74

MANAGEMENT FRAMEWORK

A management framework is needed to associate certain types of conservation or preservation actions with a unique geographic area. The management framework includes the following actions that can be utilized to implement the strategy.

1.1 Each jurisdiction is encouraged to adopt an official map and definition of the travel route and corridor. The text and maps defining the travel route can be referenced directly from page 2 in agency and municipal planning and policy documents. The text and maps defining the width of the corridor can be directly referenced from page 4 in agency and municipal planning documents. As described in Chapter 1, the width of the corridor should include all lands, structures or other alterations that can be seen from the defined route alignment up to a distance of twenty miles.

B7259 4/10/2015 2:53 PM
Deleted: should

1.2 Landscape management units provide a tool for organizing and applying proposed stewardship practices in a holistic manner across landscapes with similar characteristics. While BLM utilizes landscape units in its Visual Resource Management System as applied to the lands that they are responsible for managing. Since the CMP addresses lands managed by multiple agencies and owners—both public and private—common geographic boundaries are suggested to be adopted for use by each agency with management or planning responsibilities in the corridor, to be possibly considered as overlays. The following units are proposed:

B7259 4/10/2015 3:42 PM
Deleted: should

A. Colorado River (east of Needles)
B. Needles
C. US 95 and Goffs Road to Essex
D. Goffs (historic community)
E. Fenner (I-40 interchange)
F. Essex (historic community)
G. Essex to Amboy
H. Chambless (historic community)
I. Amboy/Amboy Crater
J. Amboy Crater to Ludlow
K. Ludlow
L. Ludlow to Newberry Springs
M. Newberry Springs
N. Newberry Springs to Daggett
O. Daggett
P. Daggett to Barstow
Q. Barstow

2. PRESERVE THE CONTEXT OF HISTORIC ROUTE 66

One of the most significant aspects of this section of Historic Route 66 is that the corridor-wide context—lands that can be seen from Historic Route 66 and form its distinctive setting—have changed little since the time when Historic Route 66 was commissioned in 1926 and indeed, back into prehistory. A significant portion of the road's Mojave Desert context (approximately 86 percent) is already preserved through legislation or has been identified for future preservation action in the draft DRECP. The following strategies and actions are recommended to preserve the remaining fourteen percent of the context of Historic Route 66, focusing on that part of the corridor defined by its viewshed.

2.1 Identify and establish priorities for delineating additional lands associated with Historic Route 66 as part of the National Lands Conservation System (NLCS).
2.2 Use BLM Visual Resource Management Objectives to guide land use decisions on federal lands (including renewable energy, utility and transmission line corridors, mining, etc.) that reflect the international recognition and high degree of interest in the preservation and enhancement of Historic Route 66 for heritage-based tourism and economic development. The following are general recommendations for establishing Visual Resource Management Classes for the corridor, with further study and coordination needed through the draft DRECP and updates to local government comprehensive plans (see Figure 80).

- Wilderness Areas, Mojave Preserve, ACEC areas, National Monuments designated as VRM Class I
- Colorado River to Needles (Landscape Units A and B), designated as VRM Class III
- Goffs Road to east of Ludlow (Landscape Units C, G, and J) designated as VRM Class II, excluding existing communities and areas designated as Class I
- Ludlow to Newberry Springs, mid and background (Landscape Unit L), designated as VRM Class III
- Newberry Springs to Barstow, north side of Landscape Unit N, designated as VRM Class IV; and south side east of transmission line crossing (VRM Class III)
- All communities (Landscape Units B, D, E, F, H, I, K, M, O, and Q) are suggested to be addressed through the updates to San Bernardino County's and the City of Barstow's Comprehensive Plans as per strategy 2.5, below. suggested

2.3. Recommendation to develop a scenic resource management protocol for private lands and lands within identified communities that complements the BLM VRM system. Coordination is suggested to ensure that Historic Route 66 is duly considered in land use decisions that permit commercial and/or utility scale energy development within the viewshed of Historic Route 66. A recommendation that the BLM VRM Level II and/or III be considered as the minimum standard outside of existing communities and previously developed areas and utility corridors to ensure conservation of the Historic Route 66 context.

2.4. Work with BLM and the County of San Bernardino to consider the application of the design guidelines adapted from the BLM's recently completed "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands," to reduce the visual contrast of renewable energy projects within the viewshed of Historic Route 66 (up to 20 miles distance), including the consideration of ancillary facilities such as fencing, roadways, maintenance buildings, lighting, and other visible elements.

B7259 4/10/2015 3:59 PM
Deleted: should

B7259 4/10/2015 4:02 PM
Deleted: D

B7259 4/10/2015 4:03 PM
Deleted: needed

B7259 4/10/2015 4:04 PM
Deleted: should

B7259 4/10/2015 4:05 PM
Deleted: San Bernardino County

B7259 4/10/2015 4:05 PM
Deleted: apply

2.5. Recommendation to identify distinct boundaries around existing communities and consider establishing new or additional policies, and if appropriate eventually ordinances, that facilitate business development and heritage-based tourism within those communities (as part of the current County of San Bernardino General Plan Update and the comprehensive plan rewrite for the City of Barstow). Note that smaller unincorporated communities such as Essex, Amboy and Ludlow are currently delineated by commercial zoning categories.

B7259 4/10/2015 4:07 PM
Deleted: I

B7259 4/10/2015 4:10 PM
Deleted: comprehensive plan rewrites for San Bernardino County

2.6. Consider additional off-premise sign regulations in Barstow to demonstrate that the proposed route for National Scenic Byway designation is in compliance with all existing local, State, and Federal laws on the control of outdoor advertising.

Chapter 4, pg, 74

3. PRESERVE HISTORIC ROUTE 66 AND DIRECTLY RELATED FEATURES

. . .

Therefore, under the definitions of National Landscape Conservation Lands noted above (NR Eligible and Landscape Intactness), Historic Route 66—the entire route in California and its relatively undisturbed context between Ludlow and US Route 95 on the Goffs route— should be included in the NLCS. This would be consistent with the recommendations to manage the lands between Ludlow and U.S. Route 95 under the VRM system as VRM Management Class I and II.

This would imply that the lands associated with Historic Route 66 would by reference become part of the National Conservation Lands system and be implemented as part of the final DRECP. The adoption of the corridor management plan by BLM would then serve to implement that recommendation.

Special Recreation Management Area Option

As noted in Chapter 2, page 8, Senator Feinstein is seeking Congressional action for the designation of the Mojave Trails National Monument. The boundary of the proposed monument includes much of the Historic Route 66 corridor west of Needles and east of Ludlow. Passage of the bill would result in the inclusion of these lands in the NLCS. If language is not included in the DRECP, the route could be managed as part of BLM's Recreation and Visitor Services Division. Under this circumstance, the corridor should be designated as a Special Recreation Management Area up until the time that Congress Acts on Barbara Feinstein's Bill or the lands are included in the NLCS as part of the DRECP.

user 4/12/2015 11:04 AM
Deleted: the

DESIGN GUIDELINES FOR RENEWABLE ENERGY DEVELOPMENT

The focus of the remaining strategies for conserving the context and roadside features of Historic Route 66 would then be on private lands where there continues to be a need to provide guidance for accommodating future renewable energy development and resource extraction activities.

The BLM Visual Resource Management System suggests restricting development in high value viewsheds. While 86 percent of the lands within the Historic Route 66 corridor are protected

by legislative designations or are designated for conservation as part of the draft DRECP under consideration, several areas remain unprotected, as discussed in Chapter 3. Strategy 2.3 on page 73 recommends that San Bernardino County consider adopting BLM Visual Resource Management objectives for private lands within the viewshed of Historic Route 66. The recommended VRM objectives, shown on Figure 80 on page 72, recommend no less than VRM level II east of Ludlow and VRM level III west of Ludlow and east of the transmission line near Daggett.

Level II allows development only if it is not conspicuous to the casual observer. In practical terms, this means new development would have to be screened from view, be distant from the road, or be designed to blend in with the natural landscape character. Level III allows for somewhat greater visibility and visual contrast of development projects, but below the point where the development would dominate the natural landscape. San Bernardino County recently adopted a solar development ordinance that regulates private solar development. It is suggested that the County should consider adopting further guidance to include wind turbines and transmission lines. It is recommended that the County consider providing guidance to help developers achieve a visual standard equivalent to the recommended VRM Objectives IV east of the existing transmission line and north of Historic Route 66. This would allow significant change to scenery, but include design and mitigation provisions. Developers could achieve renewable energy project goals while reducing visual impacts to Historic Route 66.

user 4/12/2015 3:21 PM
Deleted: T

user 4/12/2015 3:23 PM
Deleted: G

user 4/12/2015 3:23 PM
Deleted: is needed

Landscape Character Analysis

Conservation of scenery within areas proposed for energy development is encouraged to begin with a landscape character analysis that precedes the design or layout of a project. Too often, projects are designed to optimize engineering considerations before aesthetic analysis has begun. By analyzing the visual character of an area from the outset, opportunities for layout and design that lessen impacts can avoid project delays and costly arbitration.

user 4/12/2015 3:29 PM
Deleted: should

Landscape character analysis describes the overall impression created by a unique combination of visual features, including landform, vegetation, water, and structures, usually in terms of form, line, color, and texture. The Historic Route 66 corridor lies within the southern Mohave Desert, which is characterized by broad, mostly level valleys and plains interrupted by discreet hills and relatively low to moderate height mountain ranges. Vegetation cover is, for the most part, well spaced, low shrubs, and primarily creosote bush. Dominant colors are tans, browns, and grays. There is no visible surface water except at the Colorado River.

There is, however, a lot of variability. Many hills, small mountains, and mountain ranges flank the Historic Route 66 viewshed, including (from east to west); Chemeheuvi, Dead, Castle, Piute, Stepladder, Old Woman, Clipper, Bristol, Cady, Rodman, and Newberry Mountains, among others. Some of these are fairly high (approximately 3,000- to 5,500-feet) and steep sided. Together, they frame and contain the view from the road. Additional natural features with strong visual interest include volcanic cones, lava fields, sand dunes, and dry lake beds. Visual intrusions are found mainly at the east and west ends of the route. For about two-thirds of the total distance, natural features dominate the view, with the exception of the occasional transmission line, cell tower, railroad and view of I-40.

DESIGN GUIDELINES AND BEST MANAGEMENT PRACTICES

The following two determinations would provide useful perspective in addressing, evaluating, and meeting VRM Objectives, Guidelines, and Best Management Practices:

1. Measures common to all potential renewable energy projects
2. Measures that apply to specific project types (wind, solar)

Recommended Measures Common to All Potential Renewable Energy Projects to Be Considered

- Require a spatially accurate map and photo or computer representation of the proposal.
- Minimize ground disturbance and repair. This is a standard recommendation in visual and scenic resource management. It means restricting the footprint of development to only what is necessary to build the project.
- Identify Key Observation Points (KOPs). A project should be designed to reduce impacts from specific viewpoints, generally known as KOPs. Historic Route 66 should be treated as a KOP for any projects within the viewshed.
- Site facilities away from most prominent land features. For the corridor, this means avoiding placement of facilities within the direct line of sight of key local landforms that attract the eye.
- Minimize night sky impacts. The desert sky is an important scenic feature along Historic Route 66. Any projects that are developed should minimize lighting, and avoid lights that project upwards.
- Use topography to hide or screen development. When possible, site facilities so that they are behind local landforms when viewed from Historic Route 66. The taller the landform is, and the closer it is to Historic Route 66, the better it can serve as a visual screen. Consider utilizing the guidelines created by the International Dark-Sky Association (http://www.darksky.org)
- Try to site facilities in already disturbed landscapes or clearings, away from the Historic Route 66 viewshed. The west end of the Historic Route 66 viewshed has fairly large areas of previously disturbed or developed lands that could be used for energy development without despoiling more natural landscapes, especially those east of Ludlow.
- Practice good housekeeping. Avoid visual clutter, including signs, extraneous buildings, above ground wires, litter, or other materials that do not need to be in view.
- Reduce the scale of the project. Build less rather than more. This can mean a smaller footprint of development.
- Avoid ridge tops and the middle of valleys. Projects tend to blend in better when they are located below ridges and at the edges of valleys, where they are seen against landforms rather than against the sky.
- Avoid building access roads on side slopes, where cuts and fills exacerbate disturbance.
- Repair damaged areas with native vegetation and topsoil stockpiled for this purpose.

MEASURES THAT APPLY TO SPECIFIC PROJECT TYPES

Wind

Given military concerns over tall towers and concern over viewshed impacts, it is unlikely that large scale wind energy projects will be proposed within the Historic Route 66 corridor; however, if such facilities are proposed, the following practices are encouraged be used:

user 4/12/2015 4:01 PM
Deleted: should

- Set turbines well back from the travel route. The large size of modern utility scale wind turbines begins to visually dominate the landscape at a point five to 10 miles away from a viewing platform, depending on atmospheric conditions, sun light angles, and whether the

turbines are on the ridgeline or have a landscape backdrop. What is ordinarily considered to be a background distance is more like a middle ground viewing distance when it comes to utility scale wind turbines. The trend in technology is toward wind turbines becoming even larger.

- Requiring setbacks from the highway will also reduce or eliminate the chance for "shadow flicker" impacts to development near the highway, or to road users.
- Use non-linear turbine patterns. The landscape of the Historic Route 66 viewshed is variable, but hills and mountains are always in view. This means that long lines of regularly spaced turbines would contrast with the variable topography. It is better to place turbines in small clusters viewed against, not above the landforms.
- Break up the clusters. Allow sufficient distance between clusters so that the landscape remains the dominant visual element.
- Create visual order within and between turbine clusters. Chaotic or random patterns draw more attention and have higher impact than orderly arrangements of turbines. In particular, avoid having turbine clusters overlap each other in any prominent or long duration views.
- Use audio visual warning systems (AWS) to reduce night sky impacts. Because of their height, the FAA requires turbines to have day and nighttime strobe lighting. AWS systems are inactive when aircraft are not in proximity.
- Require visual uniformity in turbine design. This is very important if multiple projects are being considered within a part of the viewshed seen as a whole, but by different developers.
- Better to use fewer, larger turbines than a higher number of smaller ones to get the same amount of energy

Solar

Utility-scale solar energy projects have different visual characteristics and issues than wind energy. They tend to have large, continuous ground footprints, unlike wind energy, which retains lots of undisturbed space between turbines. Some are low profile, ground mounted Photo-voltaic (PV) collectors. Some projects include very tall (up to 650') highly reflective towers set amidst fields of mirrors. These mirrors reflect light and cause glare issues. The towers themselves emit very bright light. "Dust glow" is another visual characteristic of some solar projects.

From a visual resource perspective, lower profile, less reflective technologies like ground mounted PVs have much less visual impact than other technologies. Topography can be used to screen collectors from highway views. Outer edges of collector fields can be broken up or feathered out into the surroundings to reduce strong edge effects. Back sides of collectors are suggested to be color treated to the appropriate color choice from the BLM Environmental Color chart to reduce contrast.

Recommendations include minimizing disturbance, roads, and extra facilities is an important way to reduce potential visual impacts of solar projects.

user 4/12/2015 4:22 PM
Deleted: can

user 4/12/2015 4:25 PM
Deleted: M

Towers, which generally cannot be hidden, could be designed to look interesting architecturally, but if these are used within the Historic Route 66 viewshed, the best approach is to maintain as much distance as possible.

Transmission Lines and Towers

The most likely energy development within the Historic Route 66 viewshed is major transmission lines, probably along freeways. Visual impacts from transmission lines come from the following characteristics:

- Towers create form, line, and color contrasts with open, naturally vegetated areas
- Access and service roads can create additional color and line contrast
- Lines (conductors) create their own color and line contrast, especially when the sun is reflecting off of them
- Glass insulators can create refracted light
- Additional facilities, like substations create additional contrasts

The main ways to reduce visual contrast and impacts are suggested to include:

- Placing towers so that they are viewed against the ground or landforms instead of against the sky.
- Keeping towers and lines as far as possible from the road. Research shows that in western landscapes, untreated lattice and large monopole towers are visible to the casual observer at distances up to 10 miles and are a major visual feature at distances up to 3 miles. When a tower is placed within a quarter mile of a road, it's best to use a color treated monopole. At distances ½ mile out, a properly color treated non-specular lattice tower is preferred in an open landscape like the corridor.
- Reducing scale. Smaller H frame towers have lower visibility than larger lattice or monopole towers
- If large towers are necessary, color treated monopoles using the BLM Environmental Color Chart tend to blend better with desert scenery than galvanized steel lattice towers is suggested.
- Recommendation to minimize roads and other support facilities, and use appropriate landforms and vegetation to mask these when necessary.

user 4/12/2015 4:33 PM
Deleted: M

Chapter 6, Pg 118

2. LEVERAGING HISTORIC SIGNIFICANCE TO FACILITATE MORE FUNDING OPTIONS

Historic Route 66 is both an important heritage-based touring route and the de facto emergency alternative route to I-40. CalTrans needs to either formally designate Historic Route 66 as an official emergency alternate route, or they need to more aggressively limit overweight trucks from using the route when I-40 is closed. Official designation should bring with it increased priority for funding needed bridge repair or replacement and roadway resurfacing.

As documented in Chapter 3, Historic Route 66 is an international destination for heritage travelers. In enacting Public Law 106-45, the 106th Congress in 1999 voted unanimously to preserve the cultural resources of the Route 66 corridor and authorized the Secretary of the Interior to provide assistance. The following recommendations outline the steps needed to increase the range of funding options for needed roadway and bridge work on Historic Route 66.

2.1 Adopt, as part of the County of San Bernardino General Plan Update, a policy designating Historic Route 66 as a heritage tourism destination and, with CalTrans concurrence, confirm the de facto role as an emergency alternate route to I-40.

user 4/12/2015 6:01 PM
Deleted: San Bernardino County

2.2 Develop and adopt a phased historic preservation treatment plan that will allow bridge and resurfacing work to occur on distinct segments, between interchanges, while keeping as much of the route as possible open for business and accessible to residents.

2.3 Coordinate any and all proposed or planned road/right-of-way improvements with appropriate land management agency/office of jurisdiction to review and avoid any potential impacts to adjacent public land resources (cultural, historic, pre-historic, botanical, wildlife, scenic, etc.)

2.4 Based upon 2.3, above, develop and adopt a programmatic environmental assessment for all identified 3R work (bridge repair and roadway resurfacing) in consultation with California

Chapter 6 Pg 120

Document Historic Significance
San Bernardino County is undertaking work to ascertain historic significance and integrity of the timber trestle bridges. Route 66's alignment is considered eligible for listing on the National Register of Historic Places (see "National Register Eligible Determination" on page 43 and below) meaning that Section 106 of the National Historic Preservation Act applies to work funded directly or indirectly through federal sources.

Chapter 6, pgs. 130 &131

Signage
Sign proliferation should be minimized while providing for adequate route marking and gateway identification as currently practiced (using existing signage requirements from each jurisdiction). There are six types of signage requirements for a route to function as a viable heritage touring destination:

- Gateway signage to Route 66 - these are primarily used to direct visitors from Interstate or other Primary Routes on the National Highway System to Historic Route 66. These signs already exist for the most part and need to be maintained and periodically replaced.
- Route markers - are typically provided (see sidebar, "California Assembly Language Designating Historic Route 66" on page 129).
- Community Gateways - Route 66 communities range in size from ghost towns with zero population such as Siberia or the original Bagdad, to Barstow and Needles that serve as regional hubs and provide extensive visitor services. Community gateway signage is needed to associate these communities with the Route 66 Heritage Travel experience.
- Community Wayfinding - in the larger communities of Barstow and Needles there is a need to provide Route 66 (and other interstate) travelers with wayfinding signs to museums, historic sites and other exhibits and waysides.
- Site markers - Some Route 66 historic sites were marked as part of a signage program implemented with funding from Hampton Inns (See Figure 121 on page 103, for example). Additional sites are marked with State of California Historic Markers (See Figure 4 on page 2, for example).
- Interpretive Information - An interpretive display was installed at Danby Rest Area with funding from BMW (Figure 184). Legislation led to erection of brown signs with white lettering along Interstate 40 directing travelers to Historic Route 66. San Bernardino County installed painted route markers on the road surface of Historic Route 66 to eliminate the problems associated with theft, vandals and souvenir hounds that made it

user 4/12/2015 6:13 PM
Deleted: practices

difficult to maintain metal route marker signs. The painted surface route marker symbol has become an icon of travel along Route 66. As a result of these ongoing signage efforts, Route 66s itself is adequately marked for visitors. However, signage programs need to continually be maintained and in some cases refreshed to ensure that the signage program is supporting the heritage tourism goals.

Support Facilities

Solar panel technology required for EV charging stations should be integrated directly onto the top of a structurally approved canopy if the angle is appropriate. Alternatively, ground mounted units that are appropriately sited behind the historic structure could be used, with jurisdictional approval.

There has been considerable discussion about making Historic Route 66 an electric highway. The Historic Electric Vehicle Foundation (HEVF) promoted the effort at the Route 66 International Festival in August 2014. The theme, "Crossroads of the Past and Future," appropriately substantiated presentations on installation of charging stations along the Mother Road and the history of electric and alternative energy vehicles in America.[5] HEVF opened the world's first International Electric Vehicle Museum in Kingman, Arizona in conjunction with the festival in August.

The necessity of charging stops for electric cars would provide opportunities for substantiating destinations along the route. Rest stops that were once popular during the heyday of the route could be reborn or reinvented. Cultural images and experiences of the roadway could be coupled with new technology, as solar-powered EV charging stations begin to emerge. The iconic gas station awnings along Route 66 could be rebuilt, meeting current building code specifications, to support the solar infrastructure necessary for EV charging.

Charging stations are becoming popular around and within National Parks as agencies such as the Black Bear Solar Institute (BBSI) support the US Department of Energy's "the EV Project." A "Green Gateway" in Tennessee was established by BBSI linking Interstate Highways and major metropolitan areas in Tennessee with the Great Smoky Mountains National Park (GSMNP). With this technology, electric vehicles are able to tour GSMNP without emissions, reducing haze that obscures views to distant mountain ridges and balds. Future plans will bring solar electric shade canopies to gateway communities of GSMNP.

Chapter 7
Land Use Services, Planning, No Comment

Chapter 8 Implementation pg. 159 - 160
(below is the copy from a side panel on pg 159)
Potential Route 66 Partners • Bureau of Land Management (BLM), California Desert District • California Historic Route 66 Association (CHR66A) • National Park Service Route 66 Corridor Preservation Program (NPS) • San Bernardino County (Public Works, Land Use Services and Economic Development) • City of Needles • City of Barstow • CalTrans • California Preservation Foundation (CPF) • Visit California • Discover Inland Empire • Needles Chamber of Commerce • Barstow Chamber of Commerce • Newberry Springs Chamber of Commerce • Residents and Businesses in Route 66 communities • National Historic Route 66 Federation "Highway Adopters" (Sections 21, 22, 23) • University students and faculty •

user 4/12/2015 7:54 PM
Deleted: Planning

Preservation and Conservation organizations • Wildlands Conservancy • El Garces; • Needles Museum • Mojave Desert Cultural and Heritage Association • Goff's Schoolhouse • Mother Road Route 66 Museum • Desert Discovery Center • Mojave River Valley Museum, Barstow • Adventure Cycling Association

. . .

In anticipation of a new nomination period opening, CMP project partners should be prepared to respond quickly. A nomination period could be opened for as little as 90 days. Given funding issues, any new nomination period that is opened will likely have similar 2015 requirements as 2009. Preparation for nomination should include the following actions:

1. Project partners with responsibilities for the road and right-of-way should endorse the CMP and agree to participate in its implementation. Evidence of that agreement should be in the form of a resolution (San Bernardino County, City of Needles and City of Barstow) or a letter from the agency administrator at the highest level possible (BLM-CDD).
2. A memorandum of agreement should be established that defines responsibilities among partners for implementation of the CMP including establishment of the lead "byway organization" that will serve as primary contact for coordinating all partner activities. See "Establishment Phase" on page 161.
3. Congressional offices should be briefed on CMP status. Top priority projects where federal assistance may be requested and any critical coordination issues where Congressional leadership may be of value to the plan's implementation should be identified. Letters of support should be requested.
4. Similarly, State Senators and Assembly representatives should be briefed. Letters of support should be requested.
5. Use the FY 2008 Nomination Guide (http://www.fhwa.dot.gov/hep/scenic_byways/nominations/guide/) to prepare materials for the nomination package.
6. A table is included in Chapter 1 providing information (including page numbers) where FHWA's fourteen requirements for CMPs are found within the CMP document.
7. Map 3, Historic Features should be utilized as the primary map for the nomination application (3 panels).

• West panel:
(http://www.lardnerklein.com/cart66cmp/draftreportmaps/CART66_Themes_West_032414r.pdf)
• Central panel:
(http://www.lardnerklein.com/cart66cmp/draftreportmaps/CART66_Themes_Mid_032414r.pdf)
• East panel:
(http://www.lardnerklein.com/cart66cmp/draftreportmaps/CART66_Themes_East_032414r.pdf)

All-American Road (AAR) designation is also possible.

The primary differences between All-American Road and National Scenic Byway designation is that an AAR:

1) is considered a "destination unto itself" with the organizational structure in place to manage the route as a travel destination;
2) has at least two nationally significant intrinsic qualities; and
3) has the capacity to attract and support international visitors. The route should also be capable of accommodating all types of travelers and vehicles including accommodations for people with disabilities. The Needles to Barstow section of California Historic Route 66

. . .

Pg 163

An interim management structure is needed to begin the process of implementing recommendations for the Mojave (East) region's CMP, while the other two regions are completing their corridor management plans. CHR66A and BLM should continue their partnership to serve as the lead organizations in support of management needs for the route. BLM has supported the development of the CMP with staff time and other fiscal management, including administration of federal funding for preparation of the CMP. BLM provided funding to assist CHR66A with updates to the web site and public outreach. CHR66A has provided countless additional hours of volunteer time in support of the CMP. San Bernardino County staff have provided information and input on land use planning initiatives, bridge replacement efforts, storm cleanup, and more. Other partners contributed through participation in web-based meetings and public outreach efforts.

Success of the plan's implementation depends on the continuation of these current efforts, and in supporting the administrative efforts needed to keep implementation moving forward. Many similar efforts across the country have stalled due to lack of funding or staff support for administrative needs of the lead organization(s). The following administrative needs are critical to successful efforts to preserve and enhance Historic Route 66 for heritage-based tourism.

Page 164

Coordinating with agency partners
Coordination among local, state and federal agency partners provides another potential resource for implementing the CMP. Coordinated action between San Bernardino County, CalTrans, and FHWA have led to successful plans for replacing two of Historic Route 66's more distressed bridges in a manner that is sensitive to historic context—a model for how other bridges can be reconstructed. The Desert Renewable Energy Conservation Plan (DRECP) involves extensive coordination on a regional basis and requires further coordination to assure that Historic Route 66 is adequately recognized for its national and international significance. San Bernardino County is updating their General Land Use Plan. Support is needed to make sure that Historic Route 66 is recognized and referenced appropriately in agency efforts.

Preservation Committee
There are a large number of potential partners whose primary interest is in the preservation of the route's historic and cultural resources. This committee would begin the work outlined in Chapters 4 and 6 including the following priorities:
• Regular monitoring of development activities (including demolition plans for historic structures, renewable energy projects along the route, and new land use proposals) to ensure that Historic Route 66 is considered during the approval process.
• Facilitate efforts between willing property owners and the California State Historic Preservation Office (SHPO) to gain National Register listing for eligible properties Preservation planning and advocacy to encourage property owners to utilize appropriate preservation treatments when considering adaptive re-use projects for their properties
• Coordinate input to update San Bernardino County's General Land Use Plan to ensure Historic Route 66 is considered throughout the plan update process.

• Work with San Bernardino County and other stakeholders to pursue funding for rehabilitation of timber trestle bridges and other roadway preservation and maintenance treatments (see page 118)
• Advancement and pursuit of funding for the preservation planning and eventual adaptive re-use of the Amboy and Essex Schools for appropriate uses in support of future educational programs (see page 114)

Chapter 8, Pgs. 170 -171

SUSTAINING PHASE

A sustainable and marketable travel experience is one that has all the measures in place to maintain a high quality visitor experience, that is safe and enjoyable to travel by a variety of modes, and is fresh and interesting to visitors. Sustaining phase projects and programs often require changes to policy and often involve programmatic actions implemented on a recurring basis. The following policy and programmatic actions are recommended to sustain the travel experience over time:
• Work with BLM and San Bernardino County to encourage the adoption of a common framework for guiding potential conservation and preservation strategies on both public and private lands using BLM's visual resource management system as a guide (see on page 71)
• Pursue measures to conserve remaining unprotected lands that are visible from the route through the DRECP, through BLM resource management tools and policies, and through the San Bernardino County land use plan update process (see page 72)
• Develop a program and seek external funding to provide technical assistance to property owners seeking to list their property on the California and National Registers of Historic Places (see page 74)
• Develop and work with San Bernardino County to adopt design and preservation guidelines for the route addressing renewable energy projects (see page 77)
• Seek funding and support for preservation planning to guide property owners in their efforts to preserve and adaptively re-use historic properties along the route (see page 83)
• Develop a program and seek external funding to provide technical assistance and small grants to property owners in support of preservation planning, preservation treatment, property clean up and beautification, and where appropriate, interpretive waysides (see page 112)
• Work with BLM's "Connecting People to the Desert" program to better link Route 66 education and awareness with programming recreational and cultural activities along Route 66 (see page 114)
• Work with and support San Bernardino County and other users of Route 66 to actively pursue funding and support for maintaining, repairing and where appropriate reconstructing existing timber trestle bridges using context sensitive approaches similar to the Dola and Lanzit bridges (see page 118)
• Work with user groups in support of projects that increase the range and safety of alternative (bicycle, pedestrian, train, bus and multi-modal) travel options (see page 119)
• Work with San Bernardino County, CalTrans, and the California State Historic Preservation Office to develop and adopt an historic preservation treatment plan for all roadway related work using the framework outlined starting on page 120
• Continue to implement marketing strategies to sustain the level of interest and awareness of Historic Route 66 as a regional, national and international travel destination (see page 146)

Appendices – are not complete, and were unable to locate on website.

RIVER AHA
Archaeological
Heritage
Association

www.RiverAHA.org
1704 Needles Hwy.
mailing: 420 E. street
Needles,CA 92363
(760)885-9374
office@RiverAHA.com

February 28, 2015

Jim Klein, Lead Project Consultant
Lardner/Klein Landscape Architects
815 North Royal, Suite 200
Alexandria, VA 22314

1-800-337-1370 (t)
703-739-0973 (f)
cart66cmp@lardnerklein.com

RE: Comments on Draft California Route 66, Needles to Barstow Corridor Management

Dear Mr. Klein,

RiverAHA is a cultural resource management association with an office in Needles, California. The River branch of the Archaeological Heritage Association focuses upon the preservation and protection of cultural resources, historic and prehistoric, in the Lower Colorado River and the East Mojave Desert. Please, let us take this opportunity to commend you and your staff on your exemplary performance with regard to the drafting of the California Route 66, Needles to Barstow Corridor Management Plan. The plan is overwhelmingly complete, comprehensive and inclusive and we appreciate the energy and time you took to insure that individuals, local governments and business owners of the local communities had an opportunity to provide input and comments after being provided the opportunity to see the road and its resources and to hear from you the many details of this resource and your plans.

Your Appendix V is very helpful and provides an excellent summarization of the management needs and who might assist with these needs. We do, however, have a very strong concern about items under the category of "Using content sensitive solutions." There is listed under Item 1.4 "Agree upon guidelines and design standards that impact the geometric design..." then in Item 1.2 there is an important need "Coordinate any proposed or planned maintenance with appropriate land management agency or office jurisdiction." Yet under Potential Partners associated with these needs, neither Barstow nor Needles or any of the community local governments in between are mentioned. We recommend that these local

communities be included on that list and we will attempt to explain why their inclusion is so important.

The listed implementation technique for the "Using context sensitive solutions" need on page 117 is to "seek funding to prepare historic treatment plan and programmatic agreement for future maintenance activities needed to keep road open." In California, we have the California Environmental Quality Act (CEQA) that governs state and private projects. If Federal funds are involved, the Section 106 of the National Historic Preservation Act also applies. Treatment plans for historic resources are included in environmental assessment recommendations where cultural resources are to be impacted. These treatment plans are typically paid for by the project proponent. In situations where it is up to local agencies to determine the level of mitigation or the method that will be used to alleviate the impact (if any), whether or not to require data recovery and, or treatment plans, Route 66 related cultural resources are potentially at risk.

For example, at this time, we have in the City of Needles, an "I-40 Interconnect Project" which is federally funded. This project will result in widening of a portion of the Route 66 corridor and impact upon the setting of at least three historic properties, and the destruction or removal of at least two historic properties. Further, the charming geometric design of the historic curve and median at the corner of Needles Highway (Route 66) and Broadway, is to be removed. Apparently none of these properties except the road were identified as significant cultural resources in the assessment report and apparently no historic significance was found in the curve and median in the road design that would need to be protected or preserved. This curve and median are in jeopardy and scheduled to be destroyed.

Other historic properties include the "Green Mansion," the "Sage Motel" and what is believed to be a WPA built wall. The setting of the "Green Mansion" is in harm's way. The "Green Mansion" is of unique importance to American Architecture--it has been the subject of controversy because it is the only known four story building in Needles and the house was built using a rare form of technology involving a local plant traditionally used by the Aha Macav (Mojave) for their own homes and rancherias during the prehistoric past—that plant is arrowweed and this structure is truly unique. The I-40 Interconnect Project will cut into the landscape surrounding this structure, impacting the setting of the structure. The potential harm of the proposed Project action has not been assessed nor has there been formal professional documentation of the structure using the Historic American Buildings Survey and the Historic American Engineering Record ...HABS/HAER.

Another of the structures in harm's way (APN 0185-158-08 Laswell) not yet assessed for its historic significance or the potential impact that I-40 Interconnect Project will have upon it is a rare and unusually sturdy retaining wall potentially built using local cements and block; It is yet to be ascertained, but it is believed to have been built by the WPA toward the end of the Depression era. Who knows what will happen when Project activities start cutting into that historic retainer wall that holds back Mr. John Lasco's charming historic home, high on a hill above. The Lasco

family may have to be relocated and the historic home may fall into ruin without being documented.

The third of the structures not assessed for potential Project impact is a historic motel associated with Route 66 complete with neon signage. The atomic style signage of "The Sage Motel" is representative of the era but appears to be destined for destruction in the path of road widening as is the wall and the setting of the Green Mansion, yet no mention is made in the environmental impact evaluations on file for the I-40 Interconnect project and apparently nothing will be done about the impact that the project will have on any of these important historic structures that contribute to the overall historic significance, charm and character of Route 66 and the community of Needles.

A segment of Route 66 then is to be destroyed by the I-40 Interconnect project for which ground breaking is soon to begin. In our opinion this destruction is because the City of Needles wrongfully exempted itself based upon their own determination that there is "nothing there." Moreover, the cultural assessment is grossly incomplete and derelict with regard to state and federal compliance, particularly since the Project is federally funded in part and the cultural heritage sites including historic structures should have been thoroughly documented prior to an assessment of the impact of the project upon them being made. The public should have had a complete HABS/HAER report which would have at least documented the sites before destruction, but sadly this did not happen.

We recommend that under "Potential Partners" for "Using context sensitive solutions" that local city governments, Needles and Barstow be included along with the California State Legislature. It has been shown in the case of the Needles I-40 Interconnect project, that significant Route 66 properties in the way of harm are being either purposefully ignored or ignorantly overlooked. Legislation requiring all projects on the Route 66 corridor between Needles and Barstow be submitted for review by the CHR66A or a special committee of the CHR66A could potentially alleviate the problem of consultants who are unfamiliar with the resource.

With the inclusion of proposed techniques (including ours suggested above) to address our concerns, RiverAHA would be happy to endorse your draft management plan for Route 66. One further thing, we would hope that you would at least mention the potential effects of subsidence upon Route 66, the road itself, its bridges and its other points of interest, should overdrafting of the water table due to pumping.

Sincerely,

Ruth Musser-Lopez
River Archaeological Heritage
Association (RiverAHA)

Subject: RE: CART66 Status of final draft CMP revisions
Date: Wednesday, April 22, 2015 3:05:35 PM Eastern Daylight Time
From: Scott, Gloria@DOT <gloria.scott@dot.ca.gov>
To: Jim Klein <cart66cmp@lardnerklein.com>

Hi Jim,

I apologize for not responding earlier, I have been out of the office since January and was just able to return to work this week.

While I haven't had a chance to read through the whole CMP and comments, and for the most part agree with the changes suggested in the comments you have received, I do have a concern about one aspect of the cultural landscape that seems to be ignored: Billboards.

In reading through all of the Route 66 MPS/MPDs for the route in the states through which it passes, there is a goodly amount of discussion about the importance of billboards to the local economy and to the tourist businesses all along the route. With the exception of maybe one non-California MPD, billboards are identified as part of the cultural landscape of the 1950s, and of the route itself. For that reason, I think the issue of new billboards (that are compatible with or recreate billboards from the route's period of significance) deserve serious reconsideration in the management plan:

- Chapter 3 Qualities of Route 66: In my professional opinion, billboards (if any are extant from the period and have integrity) should be contributing features of the route since they are historical part of the "cultural landscape, were used by the Route 66 Association itself to promote the route as well as being critical to the economic health of tourist trade all along the route.
- Chapter 5 Enhancing the Visitor Experience: Careful placement of *new* billboards along the route would not only greatly enhance the visual/cultural experience of what Route 66 was like in its heyday (including my own experiences of cross-country trips on the route since the early 1950s), it provide invaluable education experiences. I think whatever ordinances prohibit them should be revised to allow for compatible or replica billboards from the route's period of significance.

What discussions have taken place about the use—instead of the prohibition to ban—billboard?

Gloria Scott
Built Environment Preservation Services Branch Chief
Cultural Studies Office
Caltrans Division of Environmental Analysis
ph: 916-653-1029
fax: 916-653-6126
web: Cultural Resources - Caltrans Division of Environmental Analysis

---

From: Jim Klein [mailto:cart66cmp@lardnerklein.com]
Sent: Friday, April 17, 2015 3:40 PM
To: Scott, Gloria@DOT
Subject: CART66 Status of final draft CMP revisions