

Dear Federal Highway Administration (FWHA) officials,

The Wild and Scenic River logo was created over four decades ago, remains unchanged, and appears on roadways, at road-river crossings, at access points, along river banks and in other locations to clearly identify protected rivers. The agencies managing Wild and Scenic Rivers--the Bureau of Land Management, Fish and Wildlife Service, Forest Service and National Park Service--encourage/require logo use to identify rivers within the National Wild and Scenic River System. For example, the U.S. Forest Service adopted standard Wild and Scenic River signage standards in 2013¹. The consistent application of the logo on-the-ground differentiates these special rivers from others, recognizes their special status, and makes them instantly recognizable nationwide. Further, Wild and Scenic River logo signs guide and inform travelers.

National Wild and Scenic River signage is important for several reasons:

- Congress designated Wild and Scenic Rivers for their scenic, recreational, natural, cultural, and historic resources with the intent that the public would be able to access and enjoy these resources (see <u>Wild and Scenic Rivers Act, 1968</u>). National Wild and Scenic Rivers, and their associated corridors, should be considered as Cultural and Recreational Interest Areas. There are currently 208 National Wild and Scenic Rivers. By not including Wild and Scenic River signage in the MUTCD, these rivers are often not identified to the public on many Interstates, U.S. Highways, and State highways. However, the signage for Wild and Scenic Rivers along freeway and expressway road types is consistent with the proposed rule in Section 2E.02(F): "indicate access to general motorist services, rest, scenic, and recreational areas."
- Access to water recreation is an important recreational and economic activity for many of the rural regions where these rivers are predominantly located. We observe that Section 2A.02 of the proposed rule specifically identifies the need to provide signage for recreational users who are visiting and unfamiliar with the rural area: "On low-volume rural roads, it is important to consider the needs of unfamiliar road users for occasional, recreational, and commercial transportation purposes." Allowing Wild and Scenic River signage would be consistent with this need identified by FHWA.
- It is important that these federally-protected resources be identified, to command respect and support management and enforcement goals. These are federally-protected waters, and have a defined federal boundary, within which certain activities are regulated by federal statute and regulations. Wild and Scenic Rivers should be allowed to have boundary signage in common with other boundary signage allowed for National Parks, National Forests, and other areas with federal jurisdiction. Not all Wild and Scenic Rivers are located within federal, state, or other park or public lands; some flow through a mixture of land ownerships. As a result, in these cases the only signage available to direct the public to the scenic and recreational areas along some Wild and Scenic Rivers is the Wild and Scenic River logo and signage. This is the case among at least the 16 Partnership Wild and Scenic Rivers which primarily encompass areas outside of federal and state parks and forests.
- Like National Historic Trails and National Scenic Byways, National Wild and Scenic Rivers are linear corridors with scenic and historic resources and recreational access points. The Wild and Scenic Rivers Coalition observes that the National Wild and Scenic Rivers have the same

¹ See "Sign and Poster Guidelines for the Forest Service," October 2013, REport EM7100-15, Chapter 8B.5 and Chapter 8C.13-14). <u>https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3810021.pdf</u>

identification and directional needs as proposed for the National Historic Trails and Scenic Byways for identification signage in Figure 2D-35(A-B), directional signage in Figure 2D-36, and destination signage in Figure 2M-4. We observe that Figure 2M-4 includes an example layout for accessing a launch ramp, a common recreational feature of nearly all Wild and Scenic Rivers.

• The National Wild and Scenic River System logo is a long-standing, nationally-recognized symbol. It should be included as a symbol for recreational and cultural interest. The proposed rule in Section 2M specifically envisions the use of a standard symbol for recreational and cultural interests, including those for water recreation. Adopting the Wild and Scenic River logo will prevent a proliferation of other, local signage designs for National Wild and Scenic Rivers, such as those allowed in the community wayfinding guide signage (Figure 2D-31 and Figure 2D-32). A proliferation of community signs for Wild and Scenic Rivers could confuse motorists by not using the available, standard Wild and Scenic River signage. Use of the Wild and Scenic River logo can reduce motorist distraction.

The Wild and Scenic Rivers Coalition supports the National Park Service's and Fish and Wildlife Service's previously-submitted comments, and encourages these agencies and FHWA to work together to develop Wild and Scenic River signage within the MUTCD. However, in the current proposed rule, the MUTCD does not include the Wild and Scenic River signage for directional uses (Section D), freeway and expressway usage (Section E), and recreational and cultural interest areas (Section M). Thus, it is unclear if the proposed revision would allow Wild and Scenic River sign assemblies that incorporate the river name and the Wild and Scenic River logo. A revision should be added to the MUTCD to indicate where use of the National Wild and Scenic River logo and signage are allowed, in consultation with the National Park Service, Fish and Wildlife Service, and Forest Service.

Sincerely,

Lisa A.K. Ronald

Lisa Ronald, Coordinator On behalf of the <u>Wild and Scenic Rivers Coalition</u>

Formed during the planning for the 2018 50th anniversary of the Wild and Scenic Rivers Act, the Wild and Scenic Rivers Coalition is building greater capacity for effective river advocacy, protecting and defending existing and potential Wild and Scenic Rivers, and broadening the movement for their conservation by raising awareness about their value. Together, nearly 50 river organizations large and small represent a more effective and powerful voice for the conservation of free-flowing, healthy rivers nationwide.