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March 10, 2023

Tony Tavares
 Director
 California Department of Transportation
 1120 N Street
 Sacramento, CA 95814

Re: Draft 2023 State Highway System Management Plan: Climate Adaptation and Resilience

Dear Director Tavares:

We were elated when we were made aware of the \$1.744B planned for investment to combat climate change through the Climate Adaptation and Resilience program across California. Given the recent and ongoing threats from wildfire and now flooding and snow related natural disasters, this investment couldn't come at a more critical time. An investment of this magnitude can provide meaningful relief to the vastly diverse regions across California, from the Pacific Coast to the crest of the Sierra.

As with most rural counties across California, El Dorado County recently experienced the devastating effects of catastrophic wildfire. In September and October 2022, the Mosquito Fire burned 76,788 acres and destroyed 78 homes in Placer and El Dorado Counties near the communities of Foresthill and Georgetown. The fire closed State Route 193 and threatened the closure of Interstate 80, the largest trans-Sierra pass and critical interstate trucking route. From August through October 2021, the Caldor Fire became the largest wildfire in El Dorado County history as it burned 221,835 acres and destroyed 1,003 structures. In addition to burning nearly the entire community of Grizzly Flats, the fire destroyed critical water and power infrastructure and closed US Highway 50, a key interregional corridor providing access to the Tahoe Basin. After the fire was 100% contained on October 21, 2021, at a cost of approximately \$1.2 billion, Highway 50 remained closed for several more months in order for Caltrans to repair sections of damaged roadway and remove thousands of burned trees from the Highway 50 right-of-way and eliminate the threat the trees posed to the travelling public and critical electric power infrastructure.

Given the increased frequency of catastrophic wildfire events, flooding, and severe winter storms due to climate change, the Climate Adaptation and Resilience program's \$1.744B investment to combat climate change presents a great opportunity to establish strong coordination between Caltrans, local transportation agencies, cities, counties, and the Federal Highway Administration (FHWA) to invest in rural state highway improvements that serve as the primary, and often only, access into and out of California's rural communities. Today, mountain communities in San Bernadino County are cut off from emergency services, food, and power due to the recent series of massive snowstorms. Events like the Caldor Fire that forced the evacuation of the Tahoe Basin and snowstorms which isolated communities for extended periods of time, are going to continue to occur and are likely increase in magnitude and severity in the future. That is why investment across the rural state transportation network is critical to combat the effect of climate change and protect public safety, health, and well-being.

The Draft 2023 State Highway System Management Plan (SHSMP) released on February 8, 2023, clearly recognizes the importance of addressing critical impacts to the transportation network due to climate change. The SHSMP states "Climate change is already leading to increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and

the frequency and intensity of wildfire. Wildfire can directly burn facilities and indirectly cause damage when rain falls on denuded slopes that landslides after a fire.” However, the Draft 2023 SHSMP Climate Adaptation and Resilience (Sea Level Rise) on page B-33 only identifies six coastal Caltrans districts as having Baseline Inventory deficiencies and therefore those districts will be the only ones receiving investments from the \$1.744B planned for investment to combat climate change, leaving the needs of the remaining seven Caltrans districts unfunded. EDCTC feels this is a significant oversight as it ignores the immediate threat of catastrophic wildfire and extreme winter weather events faced by rural communities in seven non-coastal Caltrans districts and the critical need for investment to mitigate the impacts of climate change and provide the public with safe access to and from rural communities.

The newly adopted Climate Action Plan Transportation Infrastructure (CAPTI) Framework specifically addresses the importance of “facilitating emergency evacuations through efficient traffic management strategies, such as the use of contra flow, use of two-way left turn lanes as through travel lanes, construction of full structural sections of shoulders and installation of Transportation Management System elements”. We support these strategies and were hopeful to see the 2023 SHSMP consider these investments as top priorities in response to the immense vulnerability of the State Highway System to wildfire in rural communities. Caltrans must consider investing in all impacts to the State Highway System, not just those along the coastal communities. Inland valley and mountain regions also experience the devastating impacts of climate change, and it is Caltrans’ responsibility to mitigate the impacts of climate to state transportation infrastructure across California and provide safe and effective access into and out of the communities at risk in all regions of the state.

Sincerely,



Woodrow Deloria
Executive Director

Cc: Michael Keever, Chief Deputy Director, Caltrans
Lee Ann Eager, Chair, California Transportation Commission
Mitch Weiss, Executive Director, California Transportation Commission
Amarjeet Benipal, Director, Caltrans District 3
John Clerici, Chair, El Dorado County Transportation Commission
Wendy Thomas, Chair El Dorado County Board of Supervisors



326 Huss Drive, Suite 150
Chico CA 95928
530-809-4616

March 8, 2023

Tony Tavares
Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Re: Draft 2023 State Highway System Management Plan: Climate Adaptation and Resilience

Dear Director Tavares:

Thank you for the opportunity to comment on the Draft 2023 State Highway System Management Plan (SHSMP) released on February 8, 2023.

The Butte County Association of Governments (BCAG) is the federally designated Metropolitan Planning Organization (MPO), state designated Regional Transportation Planning Agency (RTPA) and regional transit owner/operator for Butte Regional Transit. It is in this capacity that we provide the comments related to the SHSMP.

The Draft 2023 SHSMP Climate Adaptation and Resilience (Sea Level Rise) on page B-33 (attached) only identifies six coastal Caltrans districts as having Baseline Inventory deficiencies and therefore those districts will be the only ones receiving investments from the \$1.744B planned for investment to combat climate change, leaving Caltrans District 3 and five other districts unfunded. This appears to prioritize or only consider Sea Level Rise for this landmark infrastructure investment. Sea Level impacts are realized over a much longer time frame whereas the climate impacts in our region are now.

The Draft SHSMP states "Climate change is already leading to increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and the frequency and intensity of wildfire...wildfire can directly burn facilities and indirectly cause damage when rain falls on denuded slopes that landslides after a fire." BCAG can attest to this statement with the recent Oroville Dam Crisis in 2017 and the Paradise Camp Fire in 2018.

With the investment as proposed, California is missing an opportunity to also address inland, rural climate vulnerabilities and adaptation needs. The newly adopted Climate Action Plan Transportation Infrastructure (CAPTI) Framework specifically addresses the importance of "facilitating emergency evacuations through efficient traffic management strategies, such as the use of contra flow, use of two-way left turn lanes as through

travel lanes, construction of full structural sections of shoulders and installation of Transportation Management System elements". Not only is this concept important to ensure community safety; it is also important to ensure first responders can quickly respond to and mitigate the extent of damage to the State Highway System.

Emergency evacuations can take many forms: wildfire, earthquake, flood, hazardous material release, hurricanes, technological events, terrorist events, tornadoes, train derailments, tsunamis, etc., many of which California's are vulnerable to. In Butte County's case, the Paradise Camp Fire resulted in 85 deaths, covered over 153,000 acres, and destroyed more than 18,000 structures costing over \$16 billion in damages. In February of 2017, heavy rainfall damaged Oroville Dam's main and emergency spillways prompting more than 180,000 people living in Butte County near Oroville and downstream to evacuate. In both cases, State Route 70 and 99 were at gridlock between Chico and Sacramento.

As it stands now, I do not believe the baseline inventory deficiencies have been represented in an equitable manner based on recent and current climate disasters in California. In addition, many of these inland areas in California also areas of persistent poverty, historically disadvantaged communities, and low-income regions, thus raising geographic equity concerns as well.

The need for adequate evacuation routes with appropriate state highway improvements in rural California cannot be understated. Safety now, should be California's top priority. I hope we do not rush through this process, have an open conversation in person with stakeholders and identify a balanced set of priorities that benefit all Californians.

Sincerely,



Iván García
Programming Director

Cc: Lee Ann Eager, Chair, California Transportation Commission
Mitch Weiss, Executive Director, California Transportation Commission
Michael Keever, Chief Deputy Director, Caltrans
Amarjeet Benipal, Director, Caltrans District 3

Climate Adaptation and Resilience (Sea Level Rise)

(A) Baseline Inventory		Deficiency Unit
137		

(C) Baseline Performance		
Good	N/A	N/A
Fair	N/A	N/A
Poor	137	100.0%

	(E) Effective Deterioration (by 2033) - Do Nothing Scenario	
	Average Annual Rate	10-Year Deterioration
Into Fair	N/A	N/A
Into Poor	N/A	N/A

(G) Pipelined Projects Performance		
Fix Fair to Good	Any SHOPP or 2024 PID Workload	N/A
	Maintenance through 2022/23	N/A
	Other (STIP, Local, etc.)	N/A
	Total	N/A
Fix Poor to Good or Fair	Any SHOPP or 2024 PID Workload	0
	Maintenance through 2022/23	0
	Other (STIP, Local, etc.)	0
	Total	0
Add New	All SHOPP, Maintenance or Others	N/A

(I) Average Unescalated Capital Unit Cost and Support Ratio *		
Fix Fair to Good	SHOPP	N/A
	Maintenance	N/A
Fix Poor to Good	SHOPP	0.0%
	Maintenance	N/A
Add New	SHOPP	N/A

(K) District Breakdown						
District	Projected Inventory	Replacement Total Unit Cost*	Asset Valuation	SHOPP & Maint Performance Gap		SHOPP & Maint Gap Cost
				New	Poor	
D1	17	N/A	N/A	N/A	17	\$1,768,957
D2	0	N/A	N/A	N/A	0	\$0
D3	0	N/A	N/A	N/A	0	\$0
D4	98	N/A	N/A	N/A	98	\$10,546,255
D5	8	N/A	N/A	N/A	8	\$864,976
D6	0	N/A	N/A	N/A	0	\$0
D7	7	N/A	N/A	N/A	7	\$723,624
D8	0	N/A	N/A	N/A	0	\$0
D9	0	N/A	N/A	N/A	0	\$0
D10	0	N/A	N/A	N/A	0	\$0
D11	5	N/A	N/A	N/A	5	\$496,644
D12	2	N/A	N/A	N/A	2	\$256,306
HQ	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Totals	137	N/A	N/A	N/A	137	\$14,656,762,790

(*) DO NOT use these unit costs or support ratios for planning or project-level estimates. They represent a multi-year, programmatic-level average which includes numerous possible treatments.

DANIELA FERNANDEZ – Nevada City City Council
SUSAN HOEK – Nevada County Board of Supervisors
TOM IVY – Grass Valley City Council
ED SCOFIELD – Nevada County Board of Supervisors, Chair
JAY STRAUSS – Member-At-Large
DUANE STRAWSER – Member-At-Large
JAN ZABRISKIE – Town of Truckee



MICHAEL WOODMAN, Executive Director
AARON HOYT, Deputy Executive Director

Grass Valley • Nevada City

Nevada County • Truckee

File: 260.0

March 10, 2023

Tony Tavares, Director
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

SUBJECT: Draft 2023 State Highway System Management Plan: Climate Adaptation and Resilience

Dear Mr. Tavares,

California is set to make a historical investment of \$1.744 billion of Climate Adaptation and Resilience program funding through the Draft 2023 State Highway System Management Plan (SHSMP) to address the impacts of climate change. The importance of this funding opportunity to address the recent and annually occurring climate threats and impacts from wildfire, flooding, landslides, snow impacts, and other extreme weather impacts cannot be understated. An investment of this magnitude can provide significant benefits and strategically reduce climate impacts across the diverse regions of the state.

However, I am concerned that the landmark climate funding as proposed in the draft 2023 SHSMP only targets risks associated with sea level rise, as identified in Appendix B-33. Only the coastal districts are identified with climate “Baseline Inventory” deficiencies related to sea level rise and it appears that no other “Baseline Inventory” deficiencies are included in relation to other climate impacts such as flooding and wildfire. With the climate adaptation and resiliency investment as proposed, California is missing a strategic opportunity to address inland climate vulnerabilities and adaptation needs. Many of these inland areas that are impacted by these climate risks are also areas of persistent poverty, historically disadvantaged communities, AB 1550 low median income, and SB 535 disadvantaged communities.

The Draft SHSMP states, “Climate change is already leading to increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and the frequency and intensity of wildfire.” It is critical that actions are taken to address all of the identified climate risks. While I recognize and support climate adaptation and resiliency projects to address the projected long-term impacts of sea level rise, I feel it is critical to also invest in other more urgent and annually recurring climate impacts such as those resulting from wildfire, flooding, and landslides. As proposed, the draft plan is missing a clear opportunity to address other significant and urgent climate impacts.

Between 2018 and 2022 California experienced 38,807 wildfires resulting in a total of 9,490,075 acres burned, 148 fatalities, and 40,796 structures damaged or destroyed. The recently updated 2022 CAL FIRE Wildfire Risk Area designations increased the wildfire risk designation for multiple counties across the state, such as Nevada County, to “Very High Wildfire Risk Areas”, highlighting the risks to these communities.

The need for safe evacuation routes has never been more imperative. In Nevada County, 92% of the County’s residents live in a High or Very High Wildfire Severity Zone. According to evacuation modeling conducted

by the Nevada County Office of Emergency Services, a wildfire requiring the evacuation of the cities of Grass Valley, Nevada City, and adjacent residential areas would take approximately 7 hours and 44 minutes to evacuate the approximately 25,000 residents to the Bear River High School evacuation center located approximately 14 miles to the south. That time frame threatens the safety of all residents in the area.

With an increase in severe weather events, extended periods of drought, and human caused disasters, the Federal Highway Administration (FHWA) has highlighted the importance of the highway system during evacuations in the Promoting Resilient Operations for Transformative, Efficient, and Cost-Savings Transportation (PROTECT) Program. Historically, California has been a forward-looking leader in transportation and this landmark investment provides a unique opportunity for coordination with FHWA, state and local Offices of Emergency Services, CAL FIRE, and regional transportation agencies to take measurable action towards ensuring safer evacuation routes.

The newly adopted Climate Action Plan for Transportation Infrastructure (CAPTI) framework specifically addresses the importance of "...facilitating emergency evacuations through the efficient traffic management strategies, such as the use of contra flow, use of two-way left turn lanes as through travel lanes, construction of full structural sections of shoulders and installation of Transportation System Management elements". Not only is this concept crucial to ensure community safety, but it is also important to ensure first responders can quickly respond to incidents and mitigate the extent of the damage to the State Highway System. Funding climate adaptation and resiliency projects to address wildfire related vulnerabilities and support community evacuations in high wildfire risk areas should be prioritized.

I respectfully request that Caltrans include investments to address the critical inland impacts of climate change, such as the significant vulnerability wildfire presents to the State Highway System and to communities across the state in the final version of the SHSMP. It is vitally important that investments to address the impacts of climate change are equitably distributed across all regions of California.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Woodman", with a long horizontal flourish extending to the right.

Mike Woodman
Executive Director

Cc: Michael Keever, Chief Deputy Director, Caltrans
Lee Ann Eager, Chair, California Transportation Commission
Mitch Weiss, Executive Director, California Transportation Commission
Amarjeet Benipal, Director, Caltrans District 3
Ed Scofield, Chair, Nevada County Transportation Commission/Chair, Nevada County Board of Supervisors, District 2



Peter Rei
Chairman

Darin Grossi
Executive Director

TUOLUMNE COUNTY TRANSPORTATION COUNCIL

March 15, 2023

Tony Tavares,
Director
California Department of Transportation
P.O. Box 942873 Sacramento, CA 94273-0001

RE: Draft 2023 State Highway System Management Plan: Climate Adaptation and Resilience

Dear Mr. Tavares,

Thank you for the opportunity to comment on the Draft 2023 State Highway System Management Plan (SHSMP) released on February 8, 2023.

Tuolumne County Transportation Council Staff were excited when we became aware of the \$1.744B planned for investment to combat climate change through the Climate Adaptation and Resilience program across California. A focus on resilience and adapting to our changing climate is crucial to California's future.

This is especially true considering California has the highest number of Wildland Urban Interface (WUI) housing units (5.1 million)(USDA/Ecological Applications, <https://www.fs.usda.gov/research/treesearch/14912#>). Many of the residents of these areas are elderly, Native American, communities of color, and low to middle income individuals. An article in the International Journal of Environmental Research and Public Health found that rural areas not only saw three times more wildfire on average, but also tended to be characterized by higher rates of poverty, unemployment, and vacant housing, as well as higher proportions of low-income residents and residents without college degrees. (Disproportionate Impacts of Wildfires among Elderly and Low-Income Communities in California from 2000–2020, Shahir Masri et al., <https://www.mdpi.com/1660-4601/18/8/3921>). The same article also noted that Census tracts with a higher fire frequency and burned area had a greater proportion of Native American residents. California's affordable housing crisis will only continue to exacerbate this issue in the future. CALCOG's 2023 Regional Leaders Forum speakers emphasized the need to uplift communities of color, which have traditionally received the least amount of investment, if we are to ensure our State's continued success.

Unfortunately, when reading the 2023 SHSMP draft, a seemingly heavy emphasis on sea level rise is present. The current draft appears to allocate the landmark climate funding only to risks associated with sea level rise, as identified in Appendix B-33. Only coastal districts are identified on this page with "Baseline Inventory" climate deficiencies related to sea level rise. Those districts will be the only ones receiving investments from the \$1.744B. It appears that no other "Baseline Inventory" deficiencies are included in relation to other climate impacts such as flooding and wildfire. This does not seem to be an equitable approach to climate change adaptation and is concerning given the information we provided in the previous paragraph. Though TCTC Staff understand this was a new section, and required additional information, we feel the opportunity was missed to better define other climate change adaptation challenges and solutions.

In Tuolumne County, a majority of the County's residents live in a High or Very High Wildfire Severity Zone. The Region sees a high number of tourists staying in short term rentals who recreated both in Tuolumne County as well as in the nearby Yosemite National Park. Though this is crucial to our economy it only worsens our fire evacuation capabilities and causes gridlock during emergencies. Our recent Evacuation Needs Assessment and Communications Strategy Project modeling showed significant roadway capacity deficiencies for all of our modeled vulnerable/high risk communities.

(<https://www.tuolumnecountytransportationcouncil.org/evacuationneedsassessmentstudy>) Those roads shown as being over capacity in large evacuations included SR 108 / 120 / 49 - our main sources of ingress and egress. The newly adopted Climate Action Plan for Transportation Infrastructure (CAPTI) Framework specifically addresses the importance of "facilitating emergency evacuations through efficient traffic management strategies, such as the use of contra flow, use of two-way left turn lanes as through travel lanes, construction of full structural sections of shoulders and installation of Transportation Management System elements". Staff support these strategies and were hopeful to see the 2023 SHSMP consider these investments as top priorities in response to the immense vulnerability of rural communities along State Highway System to wildfire and other extreme weather events. The need for safe evacuation routes has never been more imperative. Without Climate Adaptation and Resilience funding for necessary improvements, a Paradise type of event on the state highways is foreseeable.

In order to ensure alignment with State equity and climate adaptation goals, Caltrans should consider investing in mitigation efforts for all impacts to the State Highway System. It is not only the coastal communities facing climate change challenges but also mountain and inland regions. Safety should be our top priority, especially for our disadvantaged communities. It is vitally important, to both our environmental future as well as economic health, that investments to address the impacts of climate change are equitably distributed across all regions of California.

Sincerely,



Darin Grossi,

Executive Director

Tuolumne County Transportation Council