

**FY 2017-18 Discussion Draft SB 1 Adaptation Planning Grant Guide
Comment Log**

August 11, 2017

Organization	Page	Comments
Alliance of Regional Collaboratives for Climate Adaptation	General	Over the last several years, we have developed Principles of Adaptation that are drawn from a variety of sources inside and outside California, and generally align with current state priorities. We feel these principles represent a holistic approach to adaptation actions that should be considered in all investment strategies to ensure they are effective, coordinated, equitable and do not result in maladaptive outcomes. For the SB1 Adaptation Planning Grants, we ask that the agency consider how to address and incorporate these principles into the guidelines.
California Natural Resources Agency	5	<p>Applicants should demonstrate how the proposed effort will accomplish one or more of the following:</p> <ul style="list-style-type: none"> • Identify system-wide climate change impact risks to transportation in the project area • Demonstrate how the proposed effort will identify specific vulnerable transportation infrastructure vulnerabilities to climate change impacts <p>Comment: I thought it needed both a system wide and infrastructure specific assessment Comment: Redundant</p>
California Natural Resources Agency	5	<ul style="list-style-type: none"> • Identify mobility needs of at-risk populations and the mobility needs of and disadvantaged communities in the project area and their vulnerabilities to climate change impacts <p>Comment: I thought this needed to more closely tie back to what they should look at for these communities.</p>
California Natural Resources Agency	5	<ul style="list-style-type: none"> • Identify the top locally prioritized climate-related risks <p>Comment: I wasn't sure what you meant by top. I tried to tie the adaptation strategies to the vulnerabilities identified in the previous bullets</p>
California Natural Resources Agency	5	<ul style="list-style-type: none"> • Identify top adaptation strategies and specific actions to remedy identified climate related vulnerabilities for further consideration • Include the evaluation of natural and green infrastructure adaptation solutions • Include economic analysis and/or cost-benefit analysis of top identified adaptation strategy or strategies
California Natural Resources Agency	5	<p>Competitive applications will include the following:</p> <ul style="list-style-type: none"> • Identification of non-transportation related climate-related risks in the project area such as public health, public safety or the economy <p>Comment: This allows them to score higher if their analysis includes non-transportation risks in the study area.</p>

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California Natural Resources Agency	5	<p>Competitive applications will include the following:</p> <ul style="list-style-type: none"> • Identify Identification of co-benefits of adaptation work, such as benefits to public health or the economy • Include Inclusion or identification of and benefit to disadvantaged communities • Demonstrate Demonstration of collaboration with diverse external stakeholders such as businesses, non-governmental agencies, and community members <p>Comment: This allows them to score higher if their analysis includes non-transportation risks in the study area.</p>
California State Association of Counties	3	Grant Program Considerations: Caltrans may wish to consider giving the applicants that own transportation infrastructure at high risk for unavoidable impacts from climate change special consideration over agencies focused solely on planning.
California State Association of Counties	3	Alternatively, for grant applications submitted by planning-focused agencies, special consideration should be given to applications that will result in work that can be adapted or replicated for use in multiple jurisdictions or in various parts of the state.
California State Association of Counties	14	Early Coordination with MPOs/RTPAs: This section of the guidelines emphasizes the need for early coordination between sub-applicants and MPOs/RTPAs. The guidelines should clarify whether sub-applicants may only apply with an MPO/RTPA as the applicant, or whether they may also apply in conjunction with other eligible applicants (i.e. transit agencies, cities and counties, tribal governments, local and regional agencies, and special districts). It is CSAC's understanding that other eligible applicants (e.g. counties) are not required to similarly coordinate with MPOs/RTPAs—the guidelines should clarify this issue.
California Transportation Commission	1	SB 1 is not a "ten-year transportation funding bill"
California Transportation Commission	1	Break available dollars out by fiscal year in new table
California Transportation Commission	1	Define nexus with transportation infrastructure -Change to trans. infrastructure Define trans. Infrastructure
California Transportation Commission	2	Change "competitively funded" to "competitively awarded"
California Transportation Commission	3	Add links for executive orders and legislation

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California Transportation Commission	5	Move "Identify at risk populations and the mobility needs of disadvantaged communities" to competitive applications section
California Transportation Commission	5	Make connections to transportation infrastructure more explicit in "Example Adaptation Planning Grant Project Types"
California Transportation Commission	5	Eligible activities must have a transportation nexus per Article XIX Section 2 and 3 of the California Constitution.
California Transportation Commission	5	Remove "regardless of funding source"
California Transportation Commission	5	Include list of all sustainable communities ineligible activities
Climate Resolve	5	<ul style="list-style-type: none"> Clearly define 'vulnerable transportation infrastructure' (which appears on numbered page 5 in the top bullet point under 'Grant Specific Objectives'). As currently stated, it is unclear which modes of transportation are eligible for these infrastructure adaptation planning funds. We encourage you to specify that active transportation modes are eligible, and to not use vehicle-centric metrics to compare projects addressing active transportation adaptation needs with those of other modes.
Climate Resolve	5	<ul style="list-style-type: none"> Require public health impacts (resultant of climate change) to be analyzed (by including it in the bullets at the top of numbered page 5). For example, higher incidence in extreme heat caused by climate change contributes to ground level ozone formation, which has serious respiratory health impacts and affects the viability of active and public transportation options. Further, extreme heat poses a risk of heat stroke to those most vulnerable. We urge you to require grantees to consider this full causal chain when assessing the mobility needs of at risk populations.
Climate Resolve	5	<ul style="list-style-type: none"> Explicitly include eligibility for planning around demographic shifts that may result from climate change (again, by including this in the bullet points at the top of numbered page 5). Population migrations due to changing climate patterns and a shifting economy are likely and should be planned for accordingly when trying to assess the future transportation needs of specific geographies. We encourage you to allow the possibility that these funds may support that sort of advanced adaptation planning work.
Climate Resolve	General	<ul style="list-style-type: none"> Make detailed data sets and other State resources readily available to awarded project teams so that grant funds can be used most cost-effectively to advance knowledge beyond that which already exists at the State level. For example, the Urban Heat Island Index that was commissioned by the California Environmental Protection Agency in 2015 produced detailed maps for 40 urban areas, but draws from a data set that could be applied on a more granular level to better analyze local UHI effects. Consultations with the grantees to make them aware of such State resources could help their adaptation planning dollars go further.

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Climate Resolve	General	In closing, we commend you for building in a learning feedback loop between this program and the Integrated Climate Adaptation and Resiliency Program (ICARP) Technical Advisory Council so that future funding programs may benefit from lessons learned here.
El Dorado County Transportation Commission	5	<p>Competitive applications will include the following::</p> <ul style="list-style-type: none"> • Include identification of and benefit to disadvantaged communities <p>Comment: This will be challenging for many rural counties who may not have concentrations of disadvantaged communities. However, many rural counties face extreme weather events which severely impact the transportation infrastructure for regional and interregional travel and goods movement. Ex. US Highway 50 and SR 193 during this past winter of 2017</p>
El Dorado County Transportation Commission	7	Additional resources need to be included to address wildland fires, as I write this SR 49 is closed in Mariposa due to the Detwiler Fire . Wildfire impacts to transportation infrastructure extend well beyond the point source or direct impact and lead to flooding, erosion, and sedimentation of riparian drainages.
Leadership Council for Justice & Accountability	9	<p>Grant-Specific Objectives</p> <p>In order to maximize potential co-benefits of the limited funds for planning grants we recommend language under “Grant-Specific Objectives” on page 9 should be as follows: “Applicants should demonstrate how the proposed effort will accomplish one four or more of the following.” This alteration of language sets a higher minimum baseline for grant applications and also recognizes that many of these objectives complement each other and provide the data and analysis necessary for effective planning and implementation of climate resilience projects.</p>

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Leadership Council for Justice & Accountability	9	<p>In addition, we recommend the following additions to the objectives:</p> <ul style="list-style-type: none"> • Demonstrate how proposed effort will address needs of at risk population and mobility needs of disadvantaged communities • Demonstrate on-going collaboration and partnerships between sectors and jurisdictions, community residents and community based organizations across levels of government at a regional scale from project inception to implementation • Identify and assess threats that result from transportation policies including but not limited to displacement, inadequate access to critical services and opportunity, and disproportionate air pollution impacts • Demonstrate how vulnerability assessments and planning efforts will lead to action and further climate adaptation • Demonstrate how public health outcomes and climate resiliency will improve • Demonstrate project alignment with reducing GHG emissions, related air pollutants, and promote climate adaptation
Leadership Council for Justice & Accountability	9	<p>Caltrans should also require applicants to develop vulnerability assessments that must discuss threats to low income communities and communities of color. Low-income communities and communities of color already have limited transportation and active transportation options, deteriorating local streets and roads, are in close proximity to and neighboring freeways/highways and major arterials and are exposed to higher levels of pollution.</p>
Leadership Council for Justice & Accountability	General	<p>Overall Grant Purpose</p> <p>The stated purpose of the grant program is to support planning actions at the local and regional levels that advance climate adaptation efforts on the transportation system. While we are supportive of advancing climate adaptation efforts on the transportation system in California, we cannot ignore that climate adaptation efforts will result in changes in transportation policies, programs and investment patterns and will impact vulnerable communities already exposed to significant threats posed by climate change. We therefore suggest that the program’s overall purpose be expanded to also include planning actions that advance climate adaptation efforts in vulnerable communities - low income communities and communities of color - as a result of changes in the transportation system and potential impacts to public health, air quality, displacement and access to critical community services and opportunities.</p>

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Leadership Council for Justice & Accountability	General	<p>Target Funds to Small and Rural Communities Rural, low-income communities of color have higher exposure rates and are more susceptible to higher rates of air pollution than other more affluent communities. According to the 2017 American Lung Association State of the Air report, CDPH's Climate Change and Health Profile Reports and CalEnviroScreen 3.0, the San Joaquin Valley is home to some of the most polluted regions at risk for climate change-related burdens in the country. In order to ensure that we have sustainable and thriving communities under climate change we need to prioritize investment in communities most vulnerable to pollution in both urban and rural areas. We recommend that the Grant Application Guide include a 50% set-aside of available funds for disadvantaged communities. Within this set-aside we recommend a component of 30% for small and rural communities under 40,000 in population and disadvantaged unincorporated communities as defined in Health and Safety Code 50199.21 and Government Code 65302.10.</p>
Leadership Council for Justice & Accountability	General	<p>Applicant must demonstrate direct and meaningful benefits Demonstration of direct and meaningful benefit to disadvantaged communities as well as co-benefits must be a requirement for all applications, not just competitive ones. We recommend that all benefits be direct and respond to a meaningful community need and/or local barriers to climate adaptation. Applicants should not only identify the mobility needs of disadvantaged communities and identify at risk populations, but should also be required to demonstrate how the proposed effort will address the mobility needs of these communities. Additionally, applicants should be required to demonstrate that the project does not result in any negative or adverse impacts. For purposes of this grant, disadvantaged communities should be defined as the following: <ul style="list-style-type: none"> • Top 25% census tracts areas as identified by CalEnviroScreen • And 0-80% of local area median income (AMI), or 50-80% of AMI as defined by California Department of Housing and Community Development. The California Health Disadvantaged Index and the Climate Change and Health Profile tool have significant data gaps. CalTrans must continue to collaborate with stakeholders to fill these gaps and gain input on the climate risks and health disparities that affect disadvantaged communities. Additional input will help strengthen these tools and allow state agencies to be able to accurately identify communities most affected by climate change.</p>
Leadership Council for Justice & Accountability	General	<p>Collaboration between community residents and community based organizations We suggest that applicants demonstrate collaboration and partnerships with community residents and community based organizations. Working with community groups will help inform community priorities, assist with data, outreach, and assessment of proposed benefits.</p>

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Leadership Council for Justice & Accountability	General	<p>Removal of local match requirement for disadvantaged communities The local match of 11.47% for the current adaptation planning grants is infeasible for many rural, low-income communities. Furthermore, this requirement places additional barriers for small MPO's who already struggle to compete for state-wide applications. Caltrans states that the objective of the Adaptation Planning Grants is to support local and regional adaptation planning efforts for transportation, however the high-upfront cost of many projects makes it difficult for these communities to secure funding and impacts their ability to access clean transportation opportunities. We recommend that the local match requirement is removed for the top 25 percent census tracts identified through CalEnviroScreen. This will allow rural communities most impacted by air pollution to have a fair advantage when competing for Adaptation Planning Grants</p>
Leadership Council for Justice & Accountability	General	<p>Scoring Criteria and Evaluation We also recommend that CalTrans provide more transparency around the scoring criteria and application evaluation process. We would like to see the scoring rubric or metrics that will be used to evaluate and score projects and suggest that CalTrans provide a comment period to receive public input on these metrics.</p>
Local Government Commission	2	<p>We suggest the grant minimum be reduced to \$75,000 and the maximum be reduced to \$500,000 to allow for greater diversity statewide. With only \$7,000,000 each year, it is important early on to see the breadth of needs and approaches and share them widely to grow the practitioner base and build a body of knowledge that this program can then respond to.</p>
Local Government Commission	5	<p>Among the existing project types, we would like to see network / stakeholder capacity analyses included. Multijurisdictional coordination is an essential aspect of effective adaptation efforts, but too often people cannot invest in assessing and organizing a strong network structure for this coordination. So it remains lacking despite clear need.</p>
Local Government Commission	15	<p>Overall Grant Application guidance does not reference adaptation at all. Many applicants may be new to the adaptation field, and may need stronger guidance on what adaptation is and common principles for adaptation. We suggest referencing some of the language from Safeguarding California, or even the ARCCA principles of Adaptation to help applicants consider adaptation in the most holistic way possible.</p>
Local Government Commission	15	<p>The Project Justification also does not reference adaptation. We suggest rephrasing this to focus applicant's attention on defining an adaptation problem that affects transportation or a specific transportation vulnerability to climate impacts.</p>

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Metropolitan Transportation Commission	General	<p>MTC/ ABAG, BARC and BCDC offer the following comments for consideration: Increase maximum grant from \$1M to \$2.5M Larger grant sizes will allow for more integrative and innovative proposals, and increase the opportunity for multi-jurisdictional applications. Adapting our infrastructure to a changing climate requires a robust and coordinated approach among a wide range of stakeholders including the regional agencies, cities and counties, special districts, property owners, community residents, businesses, the design communities, among others. Because our infrastructure systems are largely interdependent, they require coordinated approaches that recognize the interconnected nature of the Bay Area region. Our past and current resiliency planning initiatives - Adapting to Rising Tides and A Resilient Transportation System for Safe and Sustainable Communities - illustrate the significant resources needed to scale planning efforts to address multi-jurisdictional adaptation challenges and integrate those into a regional adaptation strategy.</p>

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Metropolitan Transportation Commission	General	<p>Prioritize Climate Change Adaptation for the San Francisco Bay</p> <p>The San Francisco Bay Area is facing severe vulnerabilities both along the coastline, and along the 400-milelong San Francisco Bay shoreline where the region has concentrated much of its high-density development, transportation facilities and other critical infrastructure. There are many communities and assets at risk from flooding and sea level rise. These include:</p> <p>16 cities with at-risk communities were identified that have areas vulnerable to flooding at only 12 inches of water, which is within the range of a 1-year storm event that has a probability of occurring every year. This will worsen with rising sea levels - a daunting reality for many Bay Area communities that already face flooding year to year. Some examples of neighborhoods that are exposed to flooding at 12 inches include Bayview-Hunter's Point in San Francisco, Canal District in San Rafael, and East Oakland. Additionally, these are communities that have socio-economic characteristics that make them even more vulnerable to climate impacts.</p> <ul style="list-style-type: none"> • A significant number of transportation assets are at risk from flooding due to sea level rise, including but not limited to: San Francisco and Oakland International Airports; the San Francisco-Oakland Bay Bridge; the Hayward-San Mateo Bridge; Bay Area Rapid Transit (BART); Interstates 80,580,880 and 980; State Routes 37, 92, 61, 185 and 238; passenger and freight rail; the Oakland, Alameda, and Harbor Bay Island Ferry Terminals; AC Transit local and transbay bus routes; arterials, collectors, and local streets; the Webster and Posey Tubes; local bridges to the City of Alameda; the San Francisco Bay Trail; and maintenance yards. • All five Bay Area oil refineries are located near the shoreline and are either directly at risk from sea level rise or could have critical linkages or services disrupted. The refineries are all located along the shoreline because they rely on marine oil terminals. Temporary or permanent disruption of refinery operations, due to on-site flooding or access to the refinery (roads or rail) being disrupted, would have significant impacts locally, regionally, and statewide. <p>The Climate Change Adaptation Planning Grant program will provide MTC/ ABAG, BARC and BCDC with planning resources to combat the threat of flooding, sea level rise, and additional climate change impacts.</p>

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Midpeninsula Regional Open Space District	General	The District respectfully requests that the Grant Program Guidelines are inclusive of planning activities for projects that directly improve the project area's resilience to climate change through enhancements to transportation infrastructure. As is, the Grant Specific Objectives (pg. 5) focus on adaptation planning strategies and demonstration projects at a conceptual level that showcase the viability of different adaptation planning efforts locally or regionally. However, given that the stated grant objective is "to support local and regional adaptation planning efforts on the transportation system," the District respectfully requests that Grant Specific Objectives extend to planning activities for specific climate adaptation projects. Extending eligibility for planning activities relating to specific projects would allow for additional Grant Project Types to be included, such as project planning costs associated with conceptual design.
Midpeninsula Regional Open Space District	General	Further, the District requests that the guidelines specify that competitive applications include planning for carbon-neutral modes of transportation, such as pedestrian and bicycle connections.
Office of Planning and Research	2	The minimum application amount is \$150,000 \$100,000 and the maximum application amount is \$1,000,000.
Office of Planning and Research	2	Grant Min \$150,000 100,000
Office of Planning and Research	5	<ul style="list-style-type: none"> Identify at risk populations and the mobility needs of disadvantaged communities, including transit-dependent populations <ul style="list-style-type: none"> “Transit-Dependents are defined as people who are too young, too old, cannot afford or do not have access to an automobile and rely on transit to reach their destinations.” Definition from Timothy Papandreou's Westside Transportation Access Needs Assessment – Short and Long Term Improvements. http://www.its.ucla.edu/wp-content/uploads/sites/2/2014/05/0304Papandreou_GISProject3.pdf This is consistent with leading transportation justice organizations, such as Los Angeles Bus Riders Unite! and OPAL Environmental Justice Oregon. Transportation planning researchers identify a need to focus on the transit-dependent population because analyses conducted under Title VI and EO 12898 requirements only capture low-income populations and populations of color. (More on this research here: http://trec.pdx.edu/research/project/551/Understanding_the_Transit-Dependent_Population) <p>Comment: Not sure if you have a specific definition that you need to use, but if you don't want to use this, I would look to Title VI for guidance, or maybe other transportation-related federal regulations/guidance.</p>
Office of Planning and Research	5	<ul style="list-style-type: none"> Include identification of and benefit to disadvantaged communities, including transit-dependent populations

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Office of Planning and Research	5	Example Adaptation Planning Grant Project Types <ul style="list-style-type: none"> • Resiliency studies • Climate vulnerability assessments that include, but are not limited to, identifying communities and individuals with inadequate access to transportation as a result of long-term climactic changes or extreme climate-related events • Adaptation plans • Natural and green infrastructure adaptation plans • Update of existing plans to incorporate adaptation, including proposals that add or enhance elements of a climate mitigation or adaptation plan, Local Coastal Program (LCP), Local Hazard Mitigation Plan (LHMP), General Plan (including meeting Senate Bill 379 requirements)

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Office of Planning and Research	5	<p>Added text</p> <ul style="list-style-type: none"> • Vulnerability Assessment and Resilience Planning (this may include plans to decommission/abandon infrastructure that is likely to be inundated in the future, in addition to elevating, moving or other creative strategies) • Natural Infrastructure Planning (wetlands restoration along transportation corridors, low impact development storm water management, etc.) <ul style="list-style-type: none"> o Coastal ecosystem conservation and restoration planning to protect waterfront transportation infrastructure o Planning for incorporation of low impact development (LID) strategies / green infrastructure to transportation infrastructure to manage storm water runoff • Green Infrastructure Planning (urban and community greening to cool air, absorb pollutants, clean and hold water, and improve physical and mental health and productivity). <ul style="list-style-type: none"> o Providing shade along transportation corridors • Resilient Transportation Network Planning <ul style="list-style-type: none"> o Increasing transit in high-need areas, increasing active transportation options such as pedestrian and bicycling facilities, increasing connectivity for enhanced mobility and evacuation o Providing bus and other transit shelters with shade, water or other means of cooling. o Planning for installation of light-colored and/or permeable pavements and road surfaces to reduce the urban heat island effect o Planning for distributed energy and storage to provide decentralized energy system for safeguarding against loss of power due to climate-related grid disruptions • Integration of transportation adaptation planning elements or considerations into a local hazard mitigation plan, local coastal plan, general plan, adaptation plan, or other related or complementary planning efforts <ul style="list-style-type: none"> o Developing early warning systems for extreme weather events to alert residents when conditions pose a health risk. <ul style="list-style-type: none"> ☑ Provide warnings in multiple languages. ☑ Provide warnings through multiple culturally or economically-appropriate/accessible media streams (e.g. TV, radio, TTY, SMS, in-person)
Office of Planning and Research	13	The local match can be all cash, staff time , all third party in-kind contributions, or a combination of the two.

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SBCAG	5	<p>Disadvantaged Communities Requirement. Grant Specific Objectives require applicants to “identify . . . the mobility needs of disadvantaged populations” and “include identification of and benefit to disadvantaged communities.” The Guidelines should specify what definition of “disadvantaged communities” applies to this grant program. Are applicants required to use CalEPA’s definition and the CalEnviroScreen tool applicable to Cap and Trade programs under SB 535? We note that the draft Sustainable Transportation Planning Grant Guidelines appear to allow more flexibility in defining “disadvantaged communities,” although we have requested clarification with respect to those guidelines as well. SBCAG supports environmental justice goals and assisting disadvantage communities. However, as SBCAG has previously commented, the CalEPA CalEnviroScreen definition is unfair to jurisdictions, such as those in Santa Barbara County, where CalEnviroScreen identifies no disadvantaged communities. We therefore support a less rigid, context-dependent, common sense definition of “disadvantaged” based on income, level of education and other similar, straightforward population characteristics.</p>
The Nature Conservancy	3	<p>Added text (under Grant Program Considerations)</p> <ul style="list-style-type: none"> • Vibrant Communities and Landscapes document
The Nature Conservancy	4	<p>Added text</p> <p>AB 1482 directs State agencies to promote climate adaptation in planning decisions and ensure that state investments consider climate change impacts, as well as the use of natural systems and natural infrastructure (Public Resources Code Section 71153) to help the State and its transportation system adapt to climate change.</p>

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The Nature Conservancy	4	<p>Added text</p> <p>Vibrant Communities & Landscapes – A Vision for California in 2050 The California Air Resources Board (ARB) proposed 2017 Climate Change Scoping Plan Update includes Appendix C, Vibrant Communities & Landscapes – A Vision for California in 2050, to guide how the State develops communities, preserves and protects its landscapes, and ensures that all Californians have equitable access to housing, health care, jobs, and opportunity. Competitive grant applications will demonstrate a linkage to this land use vision .</p> <p>Comment: Particularly this paragraph in the Vision statement on page 2: Land is protected, managed, and developed in a manner that maximizes resilient carbon storage, food security, and other ecological, economic, and health objectives. Natural and working lands are used to build resilience in natural, built, and social systems, and provide buffers against changing climate conditions that will allow for flexible adaptation pathways;</p>
The Nature Conservancy	5	<p>Applicants should demonstrate how the proposed effort will accomplish one three or more of the following :</p> <p>Comment: Raising the bar on the number of objectives that proposals should include.</p>
The Nature Conservancy	5	<ul style="list-style-type: none"> • Identify co-benefits of adaptation work, such as benefits to public health, natural ecosystems or the economy
The Nature Conservancy	5	<p>Applicants should demonstrate how the proposed effort will accomplish one or more of the following :</p> <ul style="list-style-type: none"> • Include evaluation and/or incorporation of natural and green infrastructure solutions <p>Comment: We should encourage incorporation of natural and green infrastructure solutions – not just evaluation of.</p>
The Nature Conservancy	7	<p>Add other resources through FHWA:</p> <p>https://www.fhwa.dot.gov/environment/sustainability/resilience/</p> <p>https://www.fhwa.dot.gov/environment/sustainability/resilience/ongoing_and_current_research/green_infrastructure/</p>

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The Nature Conservancy	10	<p>To this end, all primary grant recipients will prepare a short write-up to be included in the Integrated Climate Adaptation and Resiliency Program (ICARP) Clearinghouse, which was developed to share information, resources, and case studies with local and regional jurisdictions. At a minimum, grantees will be asked to prepare a case study describing the application and proposed project and one on the completed project or plan, a power point presentation deck and GIS files of maps where applicable .</p> <p>Comment: Should require such information to be as usable and public facing as possible.</p>
The Nature Conservancy	General	<p>Transportation agencies across the country, including FHWA, encourage the use of ecosystem-based approaches in adapting to climate change. Ecosystems provide valuable services that help to build resilience and reduce the vulnerability of people, livelihoods, and infrastructure to climate change impacts.</p>