California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 948-7325 | FAX (209) 948-7164 TTY 711
www.dot.ca.gov

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Ms. Melissa Raggio
Executive Director
Calaveras County
Council of Governments
444 E. Saint Charles Street
San Andreas, CA 95249

Calaveras Council of Governments (CCOG) Regional Transportation Plan (RTP) 2025 and Initial Study Mitigated Negative Declaration (IS-MND)– SCH 2025091376

Dear Ms. Raggio,

Thank you for the opportunity to review and provide comments on the Calaveras County Council of Governments (CCOG) Regional Transportation Plan (RTP) 2025 Update and Initial Study (IS). The CCOG RTP 2025 update presents a 20-year vision for all types of transportation capital improvement projects in Calaveras County. The plan identifies transportation related issues, outlines goals, policies and objectives and includes a list of future transportation projects to address the issues.

The proposed project is the adoption and implementation of the 2025 Calaveras County RTP. The Calaveras Council of Governments (CCOG), which serves as the Regional Transportation Planning Agency (RTPA) for the County of Calaveras and the City of Angels, is required by law to adopt and submit an approved Regional Transportation Plan (RTP) to the California Transportation Commission (CTC) every five years. The RTP will serve as the guide to federal, state and local funding through 2045. The development of RTP is a cooperative effort between the CCOG, County, City of Angels, Caltrans, tribal governments, and residents of Calaveras County. Transportation improvements proposed at RTP cover all modes of travel reflecting a system planning approach within Calaveras County. Improvements are categorized as short-range (0-10 years) or long-range (11-20 years). The Regional Transportation Improvement Program (RTIP) comprises the first five years of RTP projects and is described later in the document. The RTP planning effort focuses on developing a balanced financially constrained transportation system that ensures projected revenues cover all transportation improvement costs over the life of the plan (2045).

Caltrans would like to commend CCOG for providing an updated RTP that is clear, well supported with a documented public participation process, rich with graphics, illustrations, and a detailed discussion of the region. We would like to offer the comments below on the Initial Study and to assist in the development of the Plan:

Specific Comments – Initial Study

Project Description

Aesthetics

- Page 9, Rural Landscape - it states that "ranching and agriculture play only a small role in the modern Calaveras County economy, providing less than one percent of county jobs." However, on page 12, Background: "Agriculture and livestock production are major contributors to the county's economic base.

Responses To Checklist Questions

- Page 31, Response 7, Less Than Significant Impact - This section states that the RTP improvements would improve the county's transportation network; however, it is unclear how this would be achieved, as there are no specific network-related goals.

Transportation

- Page 42 – second paragraph under Background: the number of miles of county-maintained roadways is not 1,142.16 if the total number of miles of roadway is 1,143.38 and the mileage of State Routes (SR) is 102.23. It should be 1,041.15. The stated number only accounts for 1.22 miles of State Routes.

Wildlife

- Page 47, Response to Checklist Questions - The Initial Study (IS) links RTP Goal 2 to the County's defense against wildfire risk. However, it is unclear how this goal (to promote walking, biking, and other modes of active travel in Calaveras County to improve mobility and quality of life for all residents and visitors) addresses the risks. For example, most people use autos because they must evacuate quickly. They do not have time to bike, walk, or wait for transit operators to send out buses. Furthermore, only Goal 6 addresses disaster emergency services, but it is specific to the Calaveras County Airport, not to highways or other modes of transportation.

Appendix E

- Providing a map, at least among the package of RTP-related documents, would help in better understanding where proposed improvements would be going. Maps were included within Calaveras' recent Active Transportation and Recreational Trails Plan updated project lists.

Regional Transportation Plan

General Comments

- Caltrans commends CCOG for giving enough time to review well before the deadline for adoption. This helps to ensure the best product as comments can be carefully considered and incorporated.
- Caltrans commends Calaveras Council of Governments for addressing our comments from the Administrative Draft into the Public Draft for both the checklist items and minor errors.
- Caltrans commends CCOG in their broad and collaborative process of the RTP development that involves Native American Tribal Governments as well as Stakeholders from Government agencies, private business, advocacy groups, community - based organizations and the public. We acknowledge and support the coordination with Tribes and stakeholders to consider financial partnerships on projects and grants that serve Tribal lands and surrounding communities.
- Caltrans generally does not endorse Class III bike routes on the State Highway Systems (SHS), due to Annual Average Daily Traffic (AADT), truck AADT, and speed considerations. On state highways where bicycles are allowed, current understanding is that these highways are bicycle-accessible, or that shoulders are bicycle-accessible. However, accessibility does not equal having a designated Class III facility.
- Caltrans generally supports efforts in built environments to install high visibility crosswalks at intersections. However, proposals to install new high visibility crosswalks across a state highway will require Caltrans Traffic Operations and Safety study, review, and analysis before approval or agreement.

Chapter 1. Executive Summary and Introduction

- Page 2, Action Element - The goals in the previous section do not appear well aligned with the priorities in this section.
- Page 5, Some of the key functions of the RTP are to, fourth bullet down - While technically not required, consider adding the Trade Corridor Enhancement Program (TCEP), so that the readers know that it is a priority funding program you are interested in.
- Page 6, Federal Planning Requirements - The federal planning goals listed in bullets offer support for rural highway projects when competing for discretionary funding (grants). Consider aligning these federal goals with your goals. For example, increase accessibility and mobility for people and freight, enhance integration and connectivity of the transportation system across and between modes for people and freight, and enhance travel and tourism.
- Page 7, Sec. 1.3.3 Coordination with Other Plans and Studies - Consider including the California Freight Mobility Plan (CFMP) in this section. It is highly recommended that your rural county planners participate with the California Freight Advisory Committee and the current update of the CFMP to ensure that the plan captures

the challenges and needs of rural communities and counties. Rural freight highways play a crucial role in interregional, national, and international travel, serving as the first and last miles. However, too often, the focus is disproportionately on larger urban areas.

- Page 8, Transportation and Land Use Integration - Transportation infrastructure enhances rural land use by improving connectivity, enabling businesses, agricultural products, cattle, lumber, and other natural resources to reach regional, interregional, national, and global markets more efficiently. It also improves emergency responses, including medical aid, police response times, disaster and emergency responses, and evacuation.

Chapter 2. Existing Conditions

- Page 12, Sec. 2.1 Setting - The current draft of this chapter includes inventories, maps, and raw statistics; however, its context does not effectively connect the data to relevant sections and to relate it to the plan's goals and objectives. For instance, Sections 2.8.3 (Pavement Conditions) and 2.8.4 (Bridges) present high-level data that are not directly linked to specific roadways, which makes it difficult to identify actual needs. The bridge section indicates the number of bridges eligible for rehabilitation or replacement without specifying their locations. This information does not clarify whether there is a discrete need for projects, such as safety concerns or weight restrictions on freight routes. To strengthen the Plan's purpose and need statements for modal sections (including active transportation, aviation, goods and freight movement), consider incorporating data on employment, pavement conditions, housing, bridge status, traffic volume, and truck traffic.
- Page 15, Sec. 2.4.1 Income and Poverty - Why is the county's poverty rate higher than the states? It was below the state's average in all years before 2023.
- Page 16, Sec. 2.4.2 Major Employers - The tourism industry is a major employer, so it would make sense that freight was a regional priority because trucking supplies the restaurants, hotels, and other related businesses. Freight trucking also supports the lumber industry and is utilized by the Forestry and Fire Protection industries to move heavy equipment, fire trucks, and other necessary supplies.
- Page 21, Figure 2.3 - Interestingly, the household median income is high in the western and eastern portions of the state and low in the central regions. This map is referenced on pages 18 to 20 instead of 21. However, this section only references the MHI metric; it does not explain the disparity between the east and west, as well as the central regions, of the county. Consider adding a narrative that explains it. Understanding the challenges and needs of these communities is helpful reference information for justifying funding projects and grants (purpose and need).

- Page 26, Sec. 2.8.1 Current System - It would be helpful to know about the connectivity between the U.S. Forestry Service-maintained roadways and the highway system.
- Page 29, Sec. 2.8.4 Bridges - This section provides a very general description and high-level data. Is there information on specific bridges that should be upgraded to current design standards to improve freight accessibility and avoid truck re-routing? Example: bridges with weight/height restrictions?
- Page 37, Sec. 2.8.6 VMT - Why have forest service roads seen such a significant VMT increase? Is it due to wildfires? This type of information helps develop project purpose and needs statements.
- Page 39, Sec. 2.8.7 Truck Traffic - What causes the increase (0 to 6.1%) in truck traffic at SR12 and 26? Also, what is the driver of truck traffic on these highways? What industries and businesses do they serve? Is there a reference or information on the percentage of truck traffic that consists of 5-axle trucks?
- Page 41, Sec. 2.8.8 Safety - Is there a reference or information on crashes involving freight trucks? What are the issues that are causing these collisions? (purpose and need).
- Page 53, Sec. 2.11 Aviation - Does this airport support air cargo or emergency response? If so, what types of cargo? Cargo also includes medical supplies, transporting people to higher-level medical facilities, mail, and parcels, among other items.
- Page 55, Sec. 2.12 Goods and Freight Movement - Calling attention to the STAA standards is helpful. Consider connecting those upgrades directly to truck accessibility. For example, upgrading older highways to STAA standards would allow industry-standard trucks, currently prohibited from accessing these highways, to conform to STAA standards. This would result in fewer freight trips, as one truck could haul the cargo where two would previously be required, reduce truck VMT, allow for quicker response times, and facilitate the quicker movement of emergency equipment.
- Page 55, Sec. 2.12.1 State Highway Truck Networks - Consider a Calaveras Truck Network map that is derived from the CA Truck Network CA Truck Network | Caltrans.
- Page 55, Sec. 2.12.2 Goods Movement Issues in Calaveras County - Specifically, why is it essential to upgrade the Wagon Trail section of SR to STAA standards (purpose and need)? Would it provide an economic benefit? If so, why? Would it connect industries to higher-level facilities? Would it reduce truck trips? What is the impact of having the STAA gap? This is helpful information that can be used to develop funding applications. Safety: Are there many collisions involving trucks? Why is truck traffic increasing?

Overall, it would be helpful to have more specific information and details about goods movement, such as which industries it serves, and which highways and local roads are the primary freight corridors.

- Page 56, Sec. 2.12.3 Truck Parking - Are there private parking providers? Where are truckers parking? How is the lack of availability in packing truck dryer safety? This type of information helps with developing and justifying projects.
- Page 57, 2.14.4 Goods Movement - Consider including specific impacts, such as reduced emergency response times (for both natural disasters and ambulance/police services) and evacuation times. If there are industry-standard truck restrictions (STAA gaps), does this result in goods needing to be transferred from the standardized truck to two smaller trucks to reach the final destination?
- Page 53 and 57, Sec. 2.11 Aviation - the Calaveras County Transportation Commission for their efforts to update the Airport Elements of their Calaveras County Regional Transportation Plan 2025 (RTP). There is 1 public use airport in Calaveras County.

Name	Owner	Based Aircraft
Calaveras County Airport / Maury Rasmussen Field (CPU)	County of Calaveras	77

  - It should also be noted that the Airport Land Use Compatibility Plan (ALUCP) for Calaveras County was adopted in June of 2010. The California Airport Land Use Planning Handbook states that ALUCP should have a comprehensive review and update at least every five years. Caltrans recommends that regional planning agencies prepare, when appropriate, to address the following areas of future focus:
  - Wayside equipment for electrified aircraft, and electric aviation in general.
  - Sustainable Aviation Fuel (SAF), currently in the testing stages for commercial aircraft, but will eventually trickle down to general aviation.
  - Improved ground access for multimodal transportation alternatives.
  - Advanced Air Mobility (AAM) infrastructure and concurrent land use zoning considerations. In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when sitting future development, and preserve the viability of the aviation system as an economic engine for the region.

In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when siting future development, and preserve the viability of the aviation system as an economic engine for the region.

- Page 58, Sec. 2.15 Climate Vulnerability and Mitigation - Due to the Federal Executive Orders, consider modifying this section to address preparedness and resiliency. This section is directly tied to freight movement, as heavy equipment used for emergency responses is considered cargo. Emergency response vehicles are often similar in size to standard 5-axle trucks. Furthermore, during natural disasters and weather events, trucks are used to bring in food, water, building supplies, tents, etc.)
- Page 58, Sec. 2.15 Climate Vulnerability and Mitigation - The inclusion of expanded electric vehicle charging infrastructure seems out of place in this section, as electricity will likely not be available during flooding, wildfire, and weather events.

Chapter 3. Policy Element

- Page 59, Sec. 3.1 Transportation Issues (Federal and State) - The underlying sections address laws and policies, not transportation issues. Issues include gaps in system and network connectivity, traffic congestion and delay, poor pavement, etc.
- Page 60, Sec. 3.1.3 Regional and Local Issues - What is the issue that is driving the need for transportation modes other than autos, other than a preference driven by federal and state policies and laws? Furthermore, regional and local issues include poor pavement, narrow roadways, and a lack of transportation funding availability.

Chapter 4. Action Element

- Page 68, Section 4.1 - As currently drafted, the Project Purpose and Need does not address the transportation issues used to identify the program of projects or the resulting outcomes (purpose) of those projects. It frames the plan's purpose as developing the plan.

  The Purpose and Need section within the CCOG Draft Initial Study provides clarification on what plan-level purpose and need should be (tied to its goals and objectives, 23 CFR §450.212) and includes the goals. However, the purpose and need statement does not establish a clear connection between its Plan's goals/objectives, Existing Conditions, and Actions Element. It only includes a purpose, not the need or supporting data.

  For example, on page 5 of the CCOG DIS, it states:
  "For Calaveras County, each project listed in the RTP project contributes to system preservation, capacity enhancement, safety, and/or multimodal enhancements. These broad categories capture the intended outcome for projects during the life of the RTP and serve to enhance and protect the "livability" of residents in the County."

While system preservation, capacity enhancement, safety, multimodal enhancements, and livability can be inferred from the Plan's goals and objectives, they are not clearly identified. This statement is also missing a need statement that is supported by data.

Example of what a Plan-level Purpose and Need Statement could look like:

- Purpose: The purpose of the CCOG RTP is to (include goal headings (I used generic ones for this example) enhance mobility, safety, and economic vitality by developing a sustainable multimodal transportation system that connects rural communities, supports the region's agricultural economy, and improves access to essential services through 2045.
- Need: Rural communities in Calaveras County face significant challenges due to limited transit options, with a substantial percentage of residents in outlying areas lacking access to public transportation. Additionally, aging roadways and bridges, combined with high crash rates on rural highways (including the number of annual fatalities), hinder safety and economic efficiency. Outdated infrastructure imposes restrictions that delay freight movement and emergency response during natural disasters. Furthermore, air quality concerns necessitate low-emission solutions to comply with federal and state mandates.

The plan-level purpose and need should be consistent between the CCOG RTP and the IS and should be clearly connected to the Plan's goals/objectives, based on the analysis (modal purpose and need) in the Existing Conditions section, to the Action Element (priorities, projects, project lists), and financial elements.

Performance-Based Planning and Programming – Planning to Projects / Project Lists
Currently, it is unclear how to determine if the projects/project list are aligned with the Plan's goals and objectives, because there is no cited linkage. Moreover, since the Plan's objectives do not appear measurable, even if the projects were aligned with these goals/objectives, it would be challenging to assess their impacts and benefits.

Consider revising the goals and objectives based on previous comments and utilize the data and statistics from the Existing Conditions Chapter to identify needs (deficiencies). Then use the Program-Level Performance Measures Section of the Action Element (page 84) to evaluate and analyze the projects to determine, if, or how well they align with the plan's goals and objectives (including performance measures and targets). Additionally, add a column to the project lists that specifies which goals and objectives each project addresses.

This approach will help identify transportation deficiencies and develop, justify, and prioritize projects that are consistent with the plan's goals and objectives. It may also be beneficial to group the projects based on the updated goals, objectives, modes

(specifically freight), including federal goals, so that when formula funding or discretionary grant funding becomes available, rural freight projects will be effectively supported within the Plan.

Regional Goals, Objectives, and Strategies

- Page 62, Goal 1: This goal is overly broad, seeking to address safety, efficiency, convenience, multimodal solutions, and rural character, making it challenging to address. The objective 1.1 Identify and prioritize improvements to the roadway system (page 62) is an action that is not tied to an objective or strategy. An objective is a specific, measurable statement that supports the achievement of a goal. Examples: "Increase access to jobs via transit" or "Reduce bicycle and pedestrian deaths and serious injuries (page 31, 2023 Model Long-Range Transportation Plans, A Guide to Performance-Based Planning)." Additionally, Policies 1.1.1 and 1.1.2 (page 62) do not align with Goal 1, as infrastructure maintenance/asset management (pavement) is not identified within this goal. It is unclear what Objective 1.2 (measurable) addresses. Does it address roadways that are upgraded to current design standards? If so, then the objective could be to reduce the number of roadway miles not designed to current standards. Objectives 1.3 and 1.4 look more like strategies than objectives.
- Page 65, Goal 6: Addresses disaster and emergency services specific to the Calaveras County Airport. Responding to natural disasters and emergencies also involves maintaining highway and roadway infrastructure, as well as utilizing other transportation modes, such as fire trucks, medium- and heavy-duty trucks (for moving equipment, transporting medical supplies, food, etc.), and automobiles (for evacuation). Because this is the only goal that addresses disaster emergency services, those vital highway and roadway projects are not supported.
- Page 62-67: Recommendations on Goals and Objectives - Reorganizing and consolidating the goals would enhance impact by reducing redundancy, improving focus and measurability (aligning with performance measures), removing gaps, and better addressing the rural constraints (limited funding and staffing). It would also make it easier to develop project nominations and grant requests and make them more competitive. To maximize impact, consider consolidating and refining your goals into fewer, more targeted ones. Consider the following examples:

<u>Mobility and Reliability</u> (Goals 1, 2, 3, 4, 5, 6, and 9): Provide reliable, efficient, and effective multimodal movement.

- Objective: Expand and maintain reliable public transit service
- Objective: Integrate Active Transportation (as appropriate) into roadway projects
- Objective: Integrate ZE charging infrastructure into key locations
- Objective: Improve freight mobility and reliability
- Objective: Aviation mobility and reliability

Safety and Resiliency (Goals 1, 2, 3, 6, 7, and 9): Provide a safe, secure, and resilient multimodal transportation network.
This aligns with the federal targets and can be measured (collision rates). It addresses auto, freight, aviation, transit, bicycle, and pedestrian travel.

- Objective: Reduce collisions between autos and bicycles by 3% by 2030
  - Strategy: Construct Bicycle paths
  - Strategy: Widen roadway shoulders
- Objective: Reduce collisions involving commercial trucks by 3% by 2030
  - Strategy: Access Management
  - Strategy: Install signage or striping
  - Strategy: Upgrade roadways to current design standards
- Objective: Reduce collisions between bicyclers and pedestrians by 3% by 2030
- Objectives: Reduce the number of miles freight trucks are redirected due to weather and landslides
- Objective: Improve emergency response times to natural disasters by 10% by 2030
  - Strategy: Airport improvements
  - Strategy: ITS solutions
  - Strategy: Gap Closers (example STAA, 2 to 4 lanes)

Asset Management – System Preservation (Goals 1, 4, 6, and 9): Preserve and maintain transportation infrastructure (roads, bridges, transit, aviation) to ensure long-term functionality. This aligns with the federal targets and can be measured (pavement, bridges, sidewalks, transit shelters, trails/path conditions).

- Objective: Reduce the number of pavement miles in poor condition by 3% by 2030
- Objective: Reduce collisions involving commercial trucks by 3% by 2030
- Objective: Reduce collisions between bicyclers and pedestrians by 3% by 2030

Connectivity and Accessibility (includes parts of Goals 1, 2,5, and 9):

- To improve efficiency, reliability, connectivity between transportation systems and modes.
- Objective: Improve interregional connectivity to ensure seamless access for commuters, tourists, and goods movement.
  - Strategy: Improve freight connectivity and accessibility by removing STAA gaps
- Objective: Expand accessible facilities for underserved groups, including tribes, seniors, and DACs.
- Objective: Improve connectivity between modes (auto, transit, bicycles) and key destinations (schools, jobs, grocery stores, and medical facilities)
- Objective: Engage Tribes and stakeholders - Environmental and Rural Character Preservation (Goals 1, 5, 7, 8, and 9) - Prioritize local aesthetics, minimize adverse

impacts on communities, wildlife, Tribes, and the environment and maintain the unique rural identity.
- Objective: Achieve 90% native vegetation restoration on all project sites within two years to preserve rural aesthetics
- Objective: Reduce habitat fragmentation by installing at least one wildlife crossing
- Objective: Conduct tribal consultation and community outreach on all projects
- Objective: Reduce GHG emissions by 3% by 2030
- Objective: Reduce particulate matter by 3% by 2030

From a freight perspective, it would be helpful to see goods movement highlighted more within the goals, as it would make it easier to develop rural freight highway project purpose and need statements and make those projects more competitive for discretionary grants or formula funding. It would be helpful to also elaborate on the connection between the transportation system and the state (taxes on tourists (hotels, fuel, sales tax, etc.), regional, and local economies.

Typos and Minor Edits
Please consider fixing the following typos and minor formatting issues.
- Page 6 – third paragraph: there are 2 references to "state improvement plan(s)", those references should be corrected to "state implementation plan(s).
- Page 25 – first sentence: there is a missing "(" between the words "counties" and "including" to go with the ")" after "Calaveras".
- Page 25 – last sentence: there is an extra ")" after particles.
- Page 48 – start of section 2.9.6: no space between 12 and revenue in "12revenue".
- Page 73, Table 4.1B, first row: "2-land" should be "2-lane".
- Page 82, Table 4.6 - please include Caltrans Expenditure Authorization (EA)/project ID and postmile limits for each SHOPP project, as it is difficult to refer to our project lists without this information.
- Appendix E shows many Class III bike route projects along state routes. Please note that Caltrans discourages the use of Class III bike routes unless it is absolutely necessary for connectivity between other bicycle facilities and there are no alternative routes. Please see the following references for details: Design Information Bulletin (DIB) 94 p.23, DIB 94 p.30, (Highway Design Manual) HDM 1002.1, HDM 1003.3.
- Page 23 - In general, Class III facilities should only be considered for limited distances, as an interim measure, at locations where very low volumes of bicyclists are anticipated, or where the value of providing a constrained facility outweighs the option of providing no facility at all. (DIB 94, p. 23)
- Page 30 - For Rural Main Streets, Suburban Area, and Urban Area place types, the main purpose of shared lane Class III bike routes is to bridge a short gap between

Class I, Class II, or Class IV bikeways for the sake of network connectivity. For Rural Areas not covered by the standards in this DIB, a shared shoulder Class III bike route would typically be a highway shoulder designated and signed for the shared use of motor vehicles and bicyclists. Class III bike routes that are designated shared sidewalks that cannot be constructed as Class I or Class IV bikeways should only be used when there is no feasibility of obtaining the necessary right of way width to construct dedicated bicycle and pedestrian facilities. (DIB 94 p.30)

- Class III Bikeway (Bike Route). Bike routes are shared facilities which serve either to: (a) Provide continuity to other bicycle facilities (usually Class II bikeways); or (b) Designate preferred routes through high demand corridors. As with bike lanes, designation of bike routes should indicate to bicyclists that there are particular advantages to using these routes as compared with alternative routes. This means that responsible agencies have taken actions to ensure that these routes are suitable as shared routes and will be maintained in a manner consistent with the needs of bicyclists. Normally, bike routes are shared with motor vehicles. The use of sidewalks as Class III bikeways is strongly discouraged. (HDM 1002.1)
- Class III bikeways (bike routes) are intended to provide continuity to the bikeway system. Bike routes are established along through routes not served by Class I, II, or IV bikeways, or to connect discontinuous segments of bikeways (normally bike lanes). Class III facilities are facilities shared with motor vehicles or pedestrians, which are designated by signs or permanent markings. Section 891.9 of the Streets and Highways Code prohibits the installation of a new Shared Lane Marking on a highway with a posted speed limit greater than 30 mph, except for the purpose of connecting a Class I, Class II, or Class IV bikeways through an intersection. (HDM 1003.3)

If you have any questions or concerns, please contact Shiferaw Jemberie (209) 986-9635 (email: Shiferaw.jemberie@dot.ca.gov) or me at (209) 639-8832 (email: Gregoria.ponce@dot.ca.gov).

Sincerely,

Gregoria Ponce', Chief
Office of Rural Planning

cc: Caleb Brock, Deputy District Director, Caltrans District 10
State Clearinghouse