

DOCKETED

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Comment on definition of disadvantaged communities

Additional submitted attachment is included below.



REDWOOD COAST Energy Authority

County of Humboldt • Arcata • Blue Lake • Eureka • Ferndale • Fortuna • Rio Dell • Trinidad • Humboldt Bay Municipal Water District

June 1, 2018

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 19-ERDD-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 19-ERDD-01: Redwood Coast Energy Authority Comments on EPIC/AB 523 Workshop

Dear Commission Staff,

Thank you for the opportunity to comment on project funding criteria for the California Energy Commission Electric Program Investment Charge (EPIC) program. As presented on May 17, 2018 at the AB 253 Stakeholder Workshop, the CEC proposes to identify disadvantaged communities using CalEnviroScreen 3.0, and is seeking input on potential alternative measures.

The intent of CalEnviroScreen 3.0 is to benefit low-income communities that are heavily impacted by pollution, and one consequence of this approach is that it screens out disadvantaged communities with good air quality. As the Rural County Representatives of California observed in 2016, "CalEnviroScreen multiplies the pollution burdens by population characteristics, thus basically eliminating areas of the State with good air quality from being defined as disadvantaged communities, no matter what the socioeconomic characteristics represent."¹

For a broader diversity of disadvantaged communities to compete for EPIC funding, we propose that the CEC provide grant submitters with the option to choose among several alternatives. This increases flexibility for defining and engaging with disadvantaged communities, but still allows the CEC to weight among several measures to meet current and emerging regulatory mandates. Potential alternative measures beyond CalEnviroScreen 3.0 include:

- **Poverty:** Poverty remains a national measure for defining disadvantaged communities, and is documented in California Public Resources Code (PRC) Section 75005². The California Department of Water Resources provides the Disadvantaged Communities Mapping Tool³, which illustrates median income poverty thresholds for DAC Block Groups, Tracts, and Places.

¹ Mary Pitto, letter to the Office of Environmental Health Hazard Assessment, "RE: Proposed CalEnviroScreen 3.0", October 21, 2016;

<https://oehha.ca.gov/media/downloads/calenviroscreen/comments/ruralcountyrepresentativesofcalifornia.pdf>

² California Legislative Information;

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=75005.&lawCode=PRC

³ California Department of Water Resources; <https://gis.water.ca.gov/app/dacs/>

- **California Poverty Measure:** The Public Policy Institute of California and the Stanford University Center on Poverty and Inequality conducted a joint project to update national poverty metrics, and the outcome is the California Poverty Measure (CPM)⁴. The CPM “incorporates the changes in costs and standards of living since the official poverty measure was devised in the early 1960s—and accounts for geographic differences in the cost of living across the state.” The CPM also considers tax credits and selected expenses with a disproportionate impact on low-income populations. The measure includes several data sets and a county-level map.
- **Rurality:** Rural communities are at heightened risk for geographic isolation, limited jobs and essential services, food scarcity, and other factors that affect energy security and resiliency. The Index of Relative Rurality⁵ is an updated measure of rurality developed by Purdue University and Mississippi State University, and internalizes factors beyond poverty.
- **Health Planning:** The California Office of Statewide Health Planning and Development uses Medical Service Study Areas (MSSAs)⁶ to organize population, demographic, and physician data. MSSAs were developed to identify areas of unmet priority need for primary care physicians, and geographical rural areas where unmet priority need for medical services exist. Data is presented by county and census tract.

EPIC program funds are an essential tool to address a diverse range of benefits for disadvantaged communities, and we respectfully request that the CEC select a range of measures with sufficient flexibility to engage with and deliver benefits to all disadvantaged communities across the state.

Sincerely,



Dana Boudreau
Director of Operations

⁴ Public Policy Institute of California; <http://www.ppic.org/publication/the-california-poverty-measure-a-new-look-at-the-social-safety-net/>

⁵ Waldorf, B. S., Kim, A. (2018). The Index of Relative Rurality (IRR) : US County Data for 2000 and 2010. Purdue University Research Repository. doi:10.4231/R7959FS8

⁶ Office of Statewide Health Planning and Development; <https://www.oshpd.ca.gov/documents/HWDD/GIS/RuralMSSAv3.pdf>