

DOCKETED

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on Zero-emissions Mixed-Use Development

Additional submitted attachment is included below.



To: California Energy Commission

RE: Docket #19-ERDD-01: Zero-emissions Mixed-Use Development (upcoming GFO)

The Center for Sustainable Neighborhoods supports policies and projects that help build more sustainable neighborhoods and regions. We have identified climate, the housing crisis and income inequality as our top priorities and orient much of our work around identifying and promoting solutions to these three interlinked crises. With just a little attention to detail, we think that the next EPIC challenge could be a home run on all three fronts, helping to define the cutting edge in sustainable mixed use development.

We have three main points we would like to make about the program design. The first relates to labor practices. Second is the need to explore solutions for urban, suburban and rural settings, and the third is that targeting low income communities could work better if there were some accommodation for spending on project elements that might overlap census tract boundaries.

We recommend using best practices in construction labor management to address both equity and workforce development challenges so we can grow the skilled and trained workforce we need to implement cutting edge energy solutions while assuring quality jobs for blue collar construction workers, a cohort that is increasingly dominated by people of color and particularly Latino men. To put a fine point on the matter, 1/5 of all Latino men in California work in this field. A not insignificant fraction of blue-collar construction workers live in low income or disadvantaged communities. We need to ensure they are treated well.

While California's prevailing wage requirements will apply to projects receiving funding from the Commission, they are insufficient to achieve the goals described above. To that end, we recommend the addition of an affirmative requirement for the construction portion to use prequalified responsible contractors. These prequalification criteria should include participation in a state-certified apprenticeship program that has graduated a minimum of 10 people from each TCAC region in which the project is located, disclosure of all OSHA cases, and no unsatisfied final judgments for labor-related violations.

One of the challenges in designing for carbon neutrality is that the optimum strategies and design solutions are different for urban, suburban and rural settings. In urban centers with extensive transit infrastructure, high densities are imperative and high onsite energy generation (measured at the building scale) is often not the right solution if it discourages density. In rural settings, onsite generation may be relatively cheap, but transportation related energy use may be very high. Tailoring sustainable solutions to address these varied circumstances is imperative. Accordingly we believe there should be at least two design-phase and one implementation-phase projects from each of these three categories awarded by the EPIC challenge.

The final issue we would like to address is potential merit of allowing spending on project elements that overlap census tract boundaries. To achieve an equitable economy, we need to invest more in disadvantaged and low-income communities. The geographic focus of the EPIC challenge is, in our view, right on point, at least in intention. The caveat would be that when such communities are defined by census tracts, in urban areas where these tracts are relatively small, disadvantaged communities can be spread on the map like a patch work quilt with boundaries that meet the needs of the census but not necessarily the programmatic needs of the CEC. This isn't to say we want to discourage the census backed methodology for identifying target areas. Rather it is to say that you may want to consider softening the requirement that ALL funds be spent within the designated census tracts. Some projects could overlap the boundaries of a targeted census tract and should not be disqualified because of not being wholly located within the targeted tract. You might want to say instead that for any given project, the majority of funds should be expended within the targeted census tracts.

Thanks for your attention.

Tim Frank, Executive Director
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