

DOCKETED

Docket Number:	20-TRAN-02
Project Title:	SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment
TN #:	238971
Document Title:	Del Norte Local Transportation Commission Comments - Equity Concerns re CalEnviroScreen
Description:	N/A
Filer:	System
Organization:	Del Norte Local Transportation Commission
Submitter Role:	Public Agency
Submission Date:	7/22/2021 3:37:07 PM
Docketed Date:	7/22/2021

*Comment Received From: Del Norte Local Transportation Commission
Submitted On: 7/22/2021
Docket Number: 20-TRAN-02*

Equity Concerns re CalEnviroScreen

Additional submitted attachment is included below.

July22, 2021

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

RE: Docket 20-TRAN-02

Dear Commissioners,

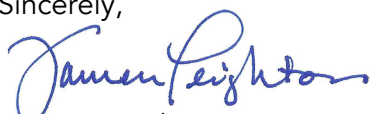
The Del Norte Local Transportation Commission appreciates the CEC's focus this year on Equity for the Clean Transportation Program, with rural areas and drive times as a basis for grantmaking in 2021 to 2023. We understand the SB 1000 (enacted in 2018) report informs these new investments. However, we strongly object to the use of CalEnviroScreen, as it conflicts with the intent of SB 1000 to increase access to electric vehicle infrastructure in all California communities.

The reliance on CalEnviroScreen to identify communities as disadvantaged has long excluded the Del Norte region and its rural neighbors from eligibility for many State grant programs. That model is weighted heavily toward criteria pollutants and finds that Del Norte County's air is too clean to qualify using this criterion. Often our communities have been vigilant in preventing pollution in the first place. The CalEnviroScreen model further disadvantages already disadvantaged rural communities in California by excluding them from grant funding.

The Del Norte region has had experience with other grant programs where projects in severely low-income communities do not qualify for funding because they do not meet the CalEnviroScreen definition of a disadvantaged community. It is critical that projects in low-income communities have equal opportunity for funding as those in "disadvantaged communities" as defined by CalEnviroScreen. While low-income communities in many rural counties have the advantage of cleaner air, they also typically have significantly reduced access to education and employment, making the climb out of poverty even more challenging. Therefore, it is critical that CEC work with rural regions to establish a metric for identifying and evaluating disadvantaged, low-income, or impoverished.

Please consider allowing an expanded definition of disadvantaged communities for the Clean Transportation Program throughout its development. Thank you for your consideration.

Sincerely,



Tamera Leighton, Executive Director
Del Norte Local Transportation Commission