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Comment Letter from EDCWA: Incorporating Community Focused Equity in Research Funding

Please find attached the El Dorado County Water Agency comment letter.

Additional submitted attachment is included below.



El Dorado County Water Agency

Dale Coco, M.D.
El Dorado Irrigation District

Duane Wallace
South Tahoe P.U.D.

Shiva Frentzen
Board of Supervisors

Michael Ranalli
Board of Supervisors

Brian K. Veerkamp
Board of Supervisors

Ken Payne
Interim General Manager

March 29, 2017

California Energy Commission
Subject: Incorporating Community Focused Equity in Research Funding

Dear California Energy Commission,

Please accept this comment letter from the El Dorado County Water Agency (EDCWA) in response to the California Energy Commission (CEC) Staff Workshops on Incorporating Community Focused Equity in Research Funding. The EDCWA develops countywide water planning and advocates for the water interests of El Dorado County.

The El Dorado region of the Sierra Nevada is a unique area in California that spans rural towns and popular lake and mountain resort communities. Sections of our county qualify as low-income communities, including much of the western and southern side of Lake Tahoe, as well as numerous communities on the west slope of the Sierra Nevada. As such, how CEC determines to incorporate the needs of low-income communities in your future funding initiatives will be impactful to the EDCWA community.

Low-Income Communities Needs

EDCWA appreciates that California has expanded beyond its CalEnviroScreen identification of disadvantaged communities (DAC) to include needs of low-income communities. This change will allow rural communities, like those found in El Dorado County, access to funding support for clean energy demonstration and deployment opportunities.

EDCWA would like to recommend that the CEC maximize the allowable allotments of funds towards low-income communities. Low-income communities that do not overlap with DACs have been subject to a funding handicap, and this future funding will be crucial to rural low-income communities contributing with critical GHG reduction projects. EDCWA recommends developing funding solicitation criteria that will help ensure that low-income communities can catch up with this needed funding. This could include providing a percent allotment of funds dedicated to low-income communities and points for qualified low-income community applicants.

However, if the focus on DACs will remain and take precedence over low-income communities, then EDCWA would recommend that funding solicitations separate competition between DACs and non-DACs into their respective percent funding allotments. Non-DACs, which include El Dorado County rural communities, often cannot compete against the DAC preference points assigned under the evaluation criteria. Solicitation awards that do not separate the DACs from non-DACs in the competition pool do not create equitable access for non-DACs, including low-income communities, to acquire funds.

Population Requirements

Rural, small counties, like El Dorado County, often struggle to compete against major metropolitan areas for funding and resource allocation. To more fairly balance the availability of funding between urban communities that qualify under the CalEnviroScreen pollution criteria and Sierra Nevada rural communities that do not qualify under those criteria, we request that a specific allocation, possibly 10 percent or more, of funds be dedicated to

communities in those counties that qualify as rural under the California State Department of Finance (counties with populations of less than 200,000). This will help address the current inequities and other disadvantages that are particular challenges within our rural counties.

Rural communities in the Sierra Nevada also serve as popular visitor destinations, often exploding in population during peak seasonal periods. Tahoe must be able to support a significant influx of visitors, during both the summer and winter periods, with up to 24 million visitors each year, a tremendous increase from an estimated year-round resident population of 50,000 (Tahoe Transportation District 2016). Many of these visitors come via the El Dorado Highway 50 corridor, as visitors converge on Tahoe from the San Francisco Bay and Sacramento regions.

There is an inequitable burden placed on rural, resort local populations to support the visitor population and their resultant GHG contributions, as well as construct and maintain public works infrastructure. The visitor population equates to higher demands on the electrical grid and transportation infrastructure, loads that resort communities must have the capacity to support, but often due to a low resident population count, lack the funding to implement GHG reduction projects. CEC funding will help mitigate the added GHG burdens from these visitors, as such, visitor population impacts should be accounted for in funding criteria and allocations.

Clean Energy Technology

The CEC requested feedback regarding which clean energy technologies would bring the most benefits to our community. For El Dorado county, and given the nexus among water, energy, and transportation sectors and uses, the following technologies would be applicable and advantageous to our region: in-line small hydroelectric that uses existing water systems and gravity to generate energy, water as energy storage and other grid balancing operations, solar photovoltaic projects, wastewater treatment energy recovery and generation technologies, energy efficiency equipment and process upgrades, and light- and heavy-duty electric vehicle deployment.

El Dorado is a rural, mountainous region that is heavily covered by forested land. Our boundaries include some of California's highest elevations and we tackle more severe weather, winter snow and cold temperatures, than the majority of California. Funding for demonstration projects is greatly needed and of significant interest to our communities, as many emerging and established clean technologies have yet to be proven effective for challenging terrain and environments, like those found in El Dorado County.

EDCWA recognizes the important relationship between water and energy. There are many opportunities to advance efficient energy use and clean energy, which will also benefit our customers by reducing long-term operating costs throughout our water conveyance and treatment systems. We hope to partner with the CEC in the future to work towards this goal.

CalEnviroScreen Concerns

Many rural communities in the Sierras no longer qualify under CalEnviroScreen as a DAC, despite current economic struggles. Much of the El Dorado County region is economically isolated and disadvantaged, with unemployment rates that have remained higher than state averages and incomes across the region in decline since 2010. Under the Department of Water Resources Disadvantaged Communities Mapping Tool, 59% of the Sierra Nevada region would meet the DAC classification (US Census Bureau).

Despite not meeting CalEnviroScreen pollution criteria, the Sierra Nevada/Lake Tahoe region suffers from unique environmental and public health conditions. Most of the air pollution on the west slope Sierra Nevada and in Tahoe is caused primarily from exhaust and emissions from California urban centers to the west, resulting in toxic "nonattainment" ozone levels, in violation of state, federal, and basin air quality standards. Wildfires and prescribed burns are additional unaccounted factors that affect the air quality of the El Dorado region. Wildfire-generated smoke emissions typically exceed all state and federal air quality standards and are capable of causing serious health problems.

CalEnviroScreen focuses heavily on pollution hazards that are specific to urban regions. As a result, the tool does not represent the external sources of pollution or climate change burden faced by rural, disadvantaged, low-income communities, and excludes much of rural California, including the Sierra Nevada region. This exclusion has serious funding ramifications, causing rural California communities to fall behind other regions in the state that are deemed DAC, and therefore eligible for GHG reduction fund allocations.

Thank you for considering our comments and for the opportunity to submit recommendations to the CEC regarding the staff workshop: Incorporating Community Focused Equity in Research Funding for the Electric Program Investment Charge 2018-2020 Triennial Investment Plan. We hope that the CEC will take into account the needs of California's rural, mountainous communities.

Sincerely,

A handwritten signature in black ink that reads "Kenneth V. Payne". The signature is written in a cursive style with a large, stylized 'K' and 'P'.

Kenneth V. Payne, P.E.
Interim General Manager

References

Tahoe Transportation District 2016. Carl Hasty. Memorandum: Statement on Visitation Numbers and Data for Transportation Planning. September 10, 2016.

U.S. Census Bureau: QuickFacts for South Lake Tahoe, California. Retrieved January 7, 2016. Last Updated December 2, 2015.
<http://www.census.gov/quickfacts/table/PST045215/0673108,06>

Copy:

Don Ashton, Chief Administrative Officer, El Dorado County
Jim Abercrombie, General Manager, El Dorado Irrigation District
Jodi Lauther, General Manager, Grizzly Flats Community Services District
Richard Solbrig, General Manager, South Tahoe Public Utility District
Steven Palmer, P.E., General Manager, Georgetown Divide Public Utility District