

DOCKETED

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Community Environmental Council AB 523 Implementation Comments

Additional submitted attachment is included below.



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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 Community Environmental Council AB 523 Comments

Dear Commission Staff,

On May 8, 2018, the California Energy Commission held a workshop to obtain public input on strategies for implementing Assembly Bill 523 (AB 523, Reyes, Chapter 551, Statutes of 2017). Community Environmental Council is providing the following written comments in response. Since 1970, Community Environmental Council has led the Central Coast region – and at times California and the nation – in surmounting some of the most pressing environmental challenges of our times. For the last decade, our non-profit has created regional solutions to climate change in the Central Coast region.

During the AB 523 workshop, Energy Commission staff shared plans for using CalEnviroScreen (CES) 3.0 and the California Air Resources Board (ARB) map-based tool for AB 1550. These are the proposed tools for identifying disadvantaged and low-income communities, so Technology Demonstration & Deployment (TD&D) projects that deliver direct benefits to these communities can be prioritized. In addition to CES 3.0 and ARB's map-based tool, Community Environmental Council encourages Energy Commission staff to consider the California Department of Water Resources' (DWR) map-based tool for identifying disadvantaged and low-income communities¹.

The DWR tool identifies disadvantaged communities at two different spatial scales: the Census Tract scale and a smaller Census Block scale. The choice of spatial scale can significantly influence the results of a geospatial analysis². By toggling between the Census Tract and Census Block scales in the DWR tool, it is evident that different

¹ California Department of Water Resources Disadvantaged Communities Mapping Tool. Available at: <https://gis.water.ca.gov/app/dacs/>

² "Effects of spatial resolution: worked example". Integrated Environmental Health Impact Assessment System. Available at: http://www.integrated-assessment.eu/eu/guidebook/effects_spatial_resolution_worked_example.html



geographic areas are identified as disadvantaged when the spatial scale of analysis is changed. In many cases, the disadvantaged communities identified at the Census Block scale are not identified as disadvantaged at the larger Census Tract scale.

Since CES 3.0 and ARB's map-based tool only identify disadvantaged/low-income communities at the Census tract scale, many of California's smaller disadvantaged and low-income communities are not captured in their results. Identifying low-income and disadvantaged communities at both the Census block and Census tract scales will provide a fuller accounting of California's disadvantaged communities.

Incorporating the DRW tool will provide a more comprehensive accounting of California's disadvantaged and low-income communities, which will help ensure that the EPIC program's Technology Demonstration & Deployment (TD&D) projects are prioritized for California's communities of greatest need. We therefore encourage Commission staff to consider using the DWR tool for the implementation of AB 523.

Sincerely,

A handwritten signature in black ink, appearing to read "Sigrid Wright".

Sigrid Wright
CEO/Executive Director



Community
Environmental
Council

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