

DOCKETED

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Comments: Proposed Evaluation Criteria For Benefits and Impacts to DACs

Additional submitted attachment is included below.

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Via upload: efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=19-ERDD-01

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

RE: Proposed Evaluation Criteria for Benefit and Impacts to Low-Income and Disadvantaged Communities in EPIC Grant Funding Opportunities, Docket 19-ERDD-01

Groundwork San Diego-Chollas Creek appreciates the opportunity to provide feedback to the California Energy Commission. Groundwork is a community-benefit nonprofit organization designated by the City of San Diego to address environmental justice in the Chollas Creek Watershed through citizen engagement. We have partnered with numerous community-based and nonprofit organizations, resident groups, and local schools to initiate sustainable strategies addressing environmental health risks and strengthen climate change resiliency. Our mission is to improve the neighborhoods and the local economy through the regeneration and management of the environment. Our core programs are education, restoration, conservation, environmental health, and clean energy equity.

Moving the Needle

Low-income communities are disproportionately affected by climate change and have long been overlooked by policies affecting economic, health, and environmental benefits of many low and no carbon technologies and investments. Energy production, distribution and control in disadvantaged communities (DAC) have historically been provided by large, centralized power plants using fossil fuels often distant from the source of consumption. This results in efficiency losses in transmission, evolution of greenhouse gases and highly limited access by these residents to affordable renewable energy and related employment opportunities. Energy inequities stem from absence of governmental programs addressing coordination, responsiveness, evaluation, and awareness of unique neighborhood-scale challenges and opportunities. Access by all residents in disadvantaged communities to affordable/accessible clean energy; clean air, pollution-free homes; and electric vehicles must be achieved through education and investment.

Following are comments about the **Proposed Evaluation Criteria for Benefits and Impacts to Low-Income and Disadvantaged Communities in EPIC Grant Funding Opportunities**.

EPIC Solicitation Manual template

- *The Energy Commission must encourage proposals to include activities to promote and measure localized health improvement outcomes that may not relate to clean energy, but do relate to pollution reduction. Examples are stormwater*

capture; urban forestry; drought-tolerant landscaping; indoor air quality remediation; clean transportation.

- *The Energy Commission must encourage proposals to include activities to promote and measure non-localized health improvement outcomes.*

Benefits to Low-income /Disadvantaged Communities and Localized Health Impacts

8.1

- *a) ADD...Provides specific information on how SB 350 Barriers were addressed; approximately how many residents were reached during the design phase of the project; and how many will be reached during the delivery of the project. Identifies how the project might reasonably incorporate elements of the COMMUNITY ENGAGEMENT methodology from the CARB CCI Co-Assessment Methodologies, and whether the COMMUNITY ENGAGEMENT methodology will become a work product.*
- *ADD d)... Identifies how the project might reasonably incorporate elements of the JOBS methodology from the CARB CCI Co-Assessment Methodologies, and whether the JOBS methodology will become a work product.*
- *ADD e)... Identifies how the project might reasonably incorporate elements of the ENERGY AND FUEL COST SAVINGS methodology from the CARB CCI Co-Assessment Methodologies, and whether the ENERGY AND FUEL COST SAVINGS methodology will become a work product.*

8.2

- *ADD...(d) Identifies how the project might reasonably incorporate elements of the WATER, SAVINGS; AIR POLLUTANT EMISSIONS; HEART AND LUNG;CLIMATE ADAPTATION methodologies from the CARB CCI Co-Assessment Methodologies, and whether the WATER, SAVINGS; AIR POLLUTANT EMISSIONS; HEART AND LUNG;CLIMATE ADAPTATION methodologies will become a work product.*

8.3

- *ADD...Identifies how the project will build community capacity such that residents become active in pollution tracking and reporting to decision-makers.*
- *ADD...Identifies a community-based research approach to integrate project health outcomes with community-driven policy solutions.*

Groundwork San Diego appreciates the opportunity to provide comments on the Proposed Evaluation Criteria for Benefit and Impacts to Low-Income and Disadvantaged Communities in EPIC Grant Funding Opportunities. Groundwork San Diego is pleased to work with the Energy Commission and other stakeholders to help shape the projects in our underserved communities.

Respectfully,

Leslie Reynolds
Executive Director
Groundwork San Diego