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*Comment Received From: Prosper Sustainably*  
*Submitted On: 6/14/2019*  
*Docket Number: 19-MISC-02*

**Prosper Sustainably Comments - Tribal Grant Program and Statewide Gap Analysis**

*Additional submitted attachment is included below.*

June 14, 2019

California Energy Commission  
Docket Unit, MS-4  
Docket No. 19-MISC-02  
1516 Ninth Street  
Sacramento, California 95814-5512

**Re: Commissioner Workshop on Funding Opportunities and Improving  
Access to Native American Tribes (docket #: 19-MISC-02)**

Prosper Sustainably has been assisting California tribes with energy and climate change planning since 2014. As the former Director of the Santa Ynez Chumash Environmental I have directly been working on these topics with tribes since 2007. Prosper Sustainably conducts energy and climate planning for individual tribal communities and has assisted several California tribes. We are also developing and implementing national tribal planning capacity building programs in these areas through the Tribal Climate Health Project and Intertribal Pollution Prevention Program.<sup>1</sup>

I was excited to learn about the Tribal Government Challenge Tribal Grant Program and Statewide Gap Analysis being proposed by the California Energy Commission (CEC). I want to thank the CEC for offering this unique and needed opportunity to California tribes. I also appreciate the State's proactivity in coordinating the 2018 Tribal Energy Summit at Pechanga and 2019 Tribal Microgrid Workshop. These efforts are starting to gain momentum and, if continued, should make significant progress in helping tribal communities in California address energy and climate change needs.

The main purpose of this comment letter is to provide feedback on the proposed statewide tribal gap analysis. This feedback is based on our firm's experience in conducting energy and climate planning activities and developing related capacity building resources for California and other tribes. I have summarized my interpretation of the three objectives for the statewide gap analysis based on the presentation and discussion at the May 14, 2019 workshop below. I have also provided feedback per objective.

**Statewide Gap Analysis Objectives and Feedback**

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<sup>1</sup> The Tribal Climate Health Project (TCHP) is a national tribal capacity building program that provides training and resources for tribes in preparing for and addressing the health impacts of climate change. More information on the TCHP which Prosper Sustainably is implementing on behalf of the Pala Band of Mission Indians (funded by the U.S. EPA and U.S. BIA) can be found at [www.tribalclimatehealth.org](http://www.tribalclimatehealth.org). The Intertribal Pollution Prevention Project (IPPP) is a national tribal capacity building program that will provide capacity building training and resources for tribal businesses seeking to reduce pollution and costs associated with hazardous substances, energy, and water. The IPPP is also being implemented by Prosper Sustainably on behalf of the Pala Band of Mission Indians (funded by the U.S. EPA). The IPPP started in late 2018 and currently does not have a website.

- 1. Gather information and data on each California tribe's energy and climate status, goals, and needs, along with their recommendations on how to address those needs.**

With respect to this objective, it will be important to make it very clear upfront that participation by any individual tribe is optional.

- 2. Gather information from each public agency (and utility that serves one or more tribes?) on available tribal energy and climate support and needs, and recommendations by agencies along with their recommendations on how to address those needs.**

For this objective, the "available support" can include opportunities, resources, funding, technical assistance, etc. It will be valuable for tribes to know what these are (or will be) so they can pro-actively take advantage of this support. A document and/or website that compiles this information and that is regularly updated would be a highly beneficial deliverable for this project.

Also, the discussion at the workshop regarding the gap analysis focused on tribes and state agencies. Tribes have unique opportunities and challenges in working with utilities, and perhaps there could be some focus on them during the gap analysis as well.

### **3. Prepare and distribute Statewide Tribal Gap Analysis reports**

The final product should effectively identify, analyze, and communicate tribal energy and climate support, goals, needs, and recommendations. However, it is just as important that the final product include an actionable implementation plan for addressing goals and needs. Even better would be a living and perpetual 4-5 year implementation plan that is updated annually. If this gap analysis doesn't provide tribes, agencies, and utilities a clear and actionable path forward, then its value will be limited and could become obsolete as time passes. Hopefully, this analysis is the pre-cursor to an ongoing capacity building program that provides funding, support, collaboration, and other opportunities for California tribes to address their energy and climate needs and pursue corresponding goals.

I hope the feedback offered above is useful to the CEC as you are seeking to define the scope of work for the proposed Statewide Gap Analysis. I look forward to seeing the outcomes of the Tribal Government Challenge Tribal Grant Program and Statewide Gap Analysis, and hope these initiatives lead to needed ongoing tribal grants, assistance, and other resources.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Joshua Simmons', with a stylized flourish at the end.

Joshua Simmons  
President