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Comment Received From: ICARP Extreme Heat and Community Resilience Program

Submitted On: 1/19/2024 Docket Number: 22-ERDD-01

CERI Draft Solicitation Feedback

Additional submitted attachment is included below.

January 19, 2024
Community Energy Resilience Investment (CERI)
California Energy Commision (CERI)
715 P Street
Sacramento, California 95814

RE: Community Energy Resilience Investment (CERI) Materials

Dear Community Energy Resilience Investment (CERI) staff,

Thank you for the opportunity to comment and support the Community Energy Resilience Investment (CERI) program. The ICARP Extreme Heat and Community Resilience Program staff appreciate your thoughtful approach to the creation of the CERI program and appreciate your succinct grant manual. We are grateful for the CERI program's commitment to equitable grantmaking and encourage further integration of equity measures into the grant materials where possible. We understand these suggestions may not be possible given federal funding limitations but appreciate your consideration regardless.

We are excited to see what the Program has to offer!

Solicitation Manual

Section 1B5- Disadvantaged Communities and California Native-American Tribal Territories

We support and align with your approach to provide scoring advantages for DACs and California Native American Tribes. If possible, consider expanding the DAC qualification criteria to allow for communities whose vulnerabilities are not reflected in CalEnviroScreen. The ICARP grants have recently shifted our DAC criteria to more closely align with the CARB California Climate Investments grant program. This criterion includes CalEnviroScreen disadvantaged communities and low-income communities. See below ICARP language for reference:

"Projects should use one or both of the following qualifications to identify disadvantaged communities:

- Defined as Disadvantaged Communities by the California Environmental Protection Agency per SB 535.
 - See the <u>CARB Priority Populations 2023 tool</u> "Disadvantaged Communities Tribal Lands" and "Disadvantaged Communities CES4" layers.
- Census tracts defined as disadvantaged by AB 1550, including census tracts with median household incomes at or below 80 percent of the statewide median income OR with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state

income limits adopted pursuant to Section 50093 of the California Health and Safety Code.

 See the <u>CARB Priority Populations 2023 tool</u> "Low-income communities" layer."

Section 1C6- Match Funding Requirement

We appreciate the lessened match funding requirements for small entities and believe this will further equity in the grantmaking process

Section 1E- Notice of Pre-Application Workshop

If staff capacity allows, consider adding additional Pre-Application Workshops to provide more opportunities for low-capacity applicants attend.

Section 2A2- Terms and Conditions

If possible, consider options to remove waiver of sovereign immunity for tribal applicants.

Section 2B- Meet Program Objectives

If possible, require applicants to allocate funds to the CBOs and/or Tribes who are assisting with community engagement.

Narrative Application

To further the equity goals stated in the program manual, we encourage CERI staff to further incorporate questions related to equity advancements in the narrative questions, where possible. This may include revising question 4C to replace the "n/a" option with information on how applicants will engage with vulnerable communities throughout their engagement.

Thank you for the opportunity to respond to the Draft Materials and provide our comments. We greatly appreciate your time in considering our recommendations and look forward to working in partnership with CERI staff to support the successful implementation of this new important program. Please do not hesitate to reach out to Braden Kay, OPR Extreme Heat and Community Resilience Program Manager, at braden.kay@opr.ca.gov you would like to discuss any of our comments further or if you have any questions

Sincerely,

ICARP Extreme Heat and Community Resilience Program Staff