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DATE

Commissioner Patricia Monahan
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: Disadvantaged Communities Advisory Group Comments on 2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Dear Commissioner Monahan and ARFVTP Staff,

The Disadvantaged Communities Advisory Group (DACAG) appreciates the opportunity to provide its comments on the *2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program*. The DACAG was created, pursuant to SB 350, to advise the CEC and CPUC on how programs can effectively reach and benefit communities disproportionately burdened by pollution and socio-economic challenges, including rural and tribal communities. The DACAG members represent the diverse nature of disadvantaged communities throughout the state, reflecting the different rural and urban, cultural and ethnic, and geographic regions.

Fund Projects Exclusively In and Benefiting DACs

The DACAG recommends targeting all program funding to disadvantaged communities, defined as:

- Census tracts in the top 25% of CalEnviroScreen scores;
- Tribal lands
- Census tracts with median incomes at or below 80% of area median income or state median income; and
- Households with median incomes at or below 80% of area median income.¹

These are the communities in which the need for clean transportation alternatives is greatest, and where customers for all types of vehicles are most likely to need additional funding sources in order to access cleaner options. In the context of the California transportation sector, including all vehicle classes, the \$100m budget for this program is relatively quite small. As such, the CEC should evaluate where its investments will make the biggest difference.

The DACAG recommends that the CEC conduct periodic regional community needs assessments, so that its investment priorities and strategies can be informed by the communities it intends to benefit.

¹ **CITE** TO EQUITY FRAMEWORK

Move 100% of Program Funding to Zero Emissions Fuels

The DACAG supports the CEC's move to wind down investment in natural gas. As the state moves away from fossil fuels, continued investment in natural gas technologies only prolongs the problem of stranded natural gas assets.

Similarly, the DACAG urges the CEC to move away from investments in biofuels, to a focus exclusively on zero emissions fuels for all vehicle classes. Biofuels are at best an expensive bridge to a cleaner future. Given their limited supply and relatively high cost, the DACAG believes that the ARFVTP and the state's emissions goals overall will be best served by the program investing in the zero emissions fuels and electrified transit options that are cleaner as well as more feasible and cost-effective in the long term.

Increase Workforce Development Funding

For a zero emissions future, we need not only cleaner technologies and fuels, we also need a workforce who can build and maintain it. The transition to cleaner transportation will create thousands of career-track jobs at a variety of skill levels, including design, manufacturing, maintenance, sales, and more. Workers in disadvantaged communities, as defined above, must have the opportunity to learn the skills needed to become part of the clean transportation revolution. Additionally, a trained workforce across the state, especially in maintenance and repair, is necessary to ensure that the consumer market for clean vehicles continues to grow. Customers are more comfortable buying an electric vehicle if they know they will not have to go too far to get the service and repairs they need.

Increase Transparency Around "Benefiting" Disadvantaged Communities

The DACAG commends the CEC on its commitment to projects in and benefiting DACs.² However, it is not clear what criteria CEC or program applicants use to define "benefiting DACs," nor is it clear how project applications are scored against this criteria. The DACAG recommends that the CEC clarify what it means for a project to benefit DACs. Applicants for grants should be able to clearly and transparently articulate direct benefits to DACs and residents, and when an applicant states that their project benefits DACs, information on what benefits the project delivers should be made public. Greater transparency will help the CEC better evaluate and maximize the impact of the ARFVTP on DACs.

Track and Measure Impact in Addition to Investments

The DACAG appreciates the tracking of investments in and benefiting disadvantaged and low income communities, and encourages the CEC to develop a framework for tracking impacts as well. Metrics should include local as well as global impacts. Emissions reductions are the obvious starting point, but the CEC should also track air quality impacts, as those are directly linked to human health outcomes. Additionally, the CEC should strive to quantify and track non-energy benefits like health impacts, local jobs and job quality metrics, OTHER.

Consider and Prioritize Resiliency

² CITE

Concerns about resiliency in an increasingly volatile climate are now heightened in California with the advent of Public Safety Power Shutoffs during high fire risk weather. In an emergency, it is critically important that people be able to get to safety, to medical facilities, to their families, etc. Without sacrificing any progress toward zero emissions vehicles, the CEC must prioritize resiliency as it advances the future of transportation.

Consider the Composition of the Advisory Committee

Recognizing that law requires certain categories of representation on the advisory committee, the composition leans heavily toward industry representatives who are advocating from a business / market perspective. Program would be well served by hearing from a broader, more representative set of stakeholders that reflects program beneficiaries, not just recipients. EJ communities, transit experts and advocates, workforce development, etc. Ensure representation from rural and tribal.

CONCLUSION AND SIGNATORIES