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Docket Number:	16-OIR-06
Project Title:	Senate Bill 350 Disadvantaged Community Advisory Group
TN #:	229448
Document Title:	Item 6. Draft letter from the DACAG to the CPUC on Guidance for Climate Change, Working Group 4
Description:	N/A
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Submitter Role:	Public
Submission Date:	8/15/2019 1:41:35 PM
Docketed Date:	8/15/2019

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August 16, 2019

RE: Guidance for Climate Change, Working Group 4.

To the California Public Utilities Commission,

The Disadvantaged Communities Advisory Group (“DACAG”) appreciates the Commission’s commitment to including community voices in climate change vulnerability assessments. Party comments on Working Group 4: Climate Vulnerable and Disadvantaged Communities of R.18-04-019: *Order Instituting Rulemaking to Consider Strategies and Guidance for Climate Change Adaptation*, indicate a high level of disagreement as to the role that disadvantaged communities and vulnerable customers should have in climate change adaptation planning, as well as how “Disadvantaged Community” should be defined in this context. DACAG suggests that the Commission use previously-established guidelines from the CPUC Environmental and Social Justice Action Plan¹ to guide their answers to these questions. Specifically:

ESJ Goal #1: Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts

ESJ Goal #4. Increase climate resiliency in environmental and social justice (ESJ) communities

ESJ Goal #5. Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs.

To achieve the above equity and environmental justice goals, DACAG recommends that the CPUC adopt the following recommendations:

1. The Commission should use the DACAG’s definition of “Disadvantaged Community” as a baseline for prioritizing communities in this context.

The DACAG definition of Disadvantaged Communities is:

- CalEnviroScreen, as defined by the California Environmental Protection Agency,
- Tribal Lands,
- Census tracts with area median household income/state median income, less than 80%, and

¹ “CPUC Environmental and Social Justice Action Plan.” California Public Utilities Commission. Available at <https://www.cpuc.ca.gov/CPUCNewsDetail.aspx?id=6442461331>

- Households with median household income less than 80% of Area Median Income (AMI).

Climate vulnerability is determined by exposure, sensitivity, and adaptive capacity. The above criteria capture many of the factors that contribute to sensitivity and adaptive capacity, which are strongly related to income, health, and social vulnerability. Low-income and tribal communities, for example, face limited access to secure housing, insurance, and resilient non-utility infrastructure. Each of these increases sensitivity while decreasing adaptive capacity. The high health and environmental burdens in communities identified by CalEnviroScreen are particularly sensitive to climate change-related stress. The DACAG definition identifies sensitive communities with low adaptive capacity, and is already in the hands of policymakers.

2. The Commission should leverage community-based organizations to ensure that robust community input is part of all stages of a vulnerability assessment

Communities, supported by trusted community-based organizations (CBOs), should have significant input on the vulnerability assessment process from its outset. Community input is widely recognized as a key piece of vulnerability assessments.^{2 3} It allows identification of vulnerability and solutions on smaller spatial scales than model-based assessment and reflects the fact that adaptation needs are complex and difficult to predict from data. Engaging communities early and often in any adaptation planning process supports consideration of a wider variety of viewpoints, as well as increasing public trust in any results.⁴

This community input should be part of every step of the process, including scoping, determining intended outcomes, analysis of findings, implementation, and review. This acknowledges the fact that community-members are capable of making informed and judicious decisions about these complex topics, and is consistent with goals 1, 4, and 5 of the ESJ Action Plan. A climate vulnerability assessment that does not consult with the community at every stage fails to “integrate equity and access” and will not “enhance outreach and public participation opportunities for ESJ communities to *meaningfully participate* in the CPUC's decision-making process.”

An essential piece of ensuring productive partnerships between CBOs and utilities is an accessible and dependable funding mechanism for CBO engagement. This will require a funding source outside of intervenor compensation, which is not regular enough for CBO budgeting.

² “Community-Based Climate Adaptation Planning: Case Study of Oakland, California.” Prepared for the California Energy Commission by the Pacific Institute, 2012. Publication number: CEC-500-2012-038.

³ “California Adaptation Planning Guide: Identifying Adaptation Strategies.” California Emergency Management Agency and California Natural Resources Agency, 2012

⁴ “How to Harness the Power of Your Community to Address Climate Change.” Prepared for the California Air Resources Board by the Institute for Local Government, 2010. At p 3.

Adequate funding for community engagement efforts is key for effective engagement, and should include funds for staffing, food, language support, transport, child care, facility rental, and the many other costs of facilitating community engagement.

There should also be accountability for utilities in their community engagement plans. This will ensure that utilities have robust processes for incorporating community input, using best practices. This review process should include a public comment period so that interested parties can work with the utilities to ensure their community engagement efforts are effective.

3. The Commission should begin the vulnerability assessment process as soon as feasible.

DACAG encourages the Commission to act soon. Climate change is here. Its effects are being felt by Californians in the form of wildfires, more frequent extreme heat events, rising seas, and other impacts. Communities that are financially or politically capable of adaptation planning have already begun the process, but they often do not include measures to reduce the danger to disadvantaged communities.⁵ The Commission is in a position to ensure the most vulnerable are protected first, and this should begin as soon as possible.

DACAG looks forward to working with all stakeholders to ensure that California identifies and supports disadvantaged communities' adaptation to climate change impacts. Adopting the aforementioned recommendations will support the most vulnerable populations in the state, increase the utilities' responsiveness to community needs, and help reduce the impact of climate change. It will also ensure that the ESJ Action Plan's goals are incorporated into this essential process by giving historically marginalized communities a seat at the table.

Sincerely,

The Disadvantaged Communities Advisory Group
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Angela Islas – Vice Chair
Phoebe Seaton – Secretary
Stephanie Chen
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⁵ "Community-Based Climate Adaptation Planning: Case Study of Oakland, California." Prepared for the California Energy Commission by the Pacific Institute, 2012. Publication number: CEC-500-2012-038.