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SCHOOL HOUSINGSM

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December 14, 2015

Chair Mary Nichols and Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19/December 2nd Version

Dear Ms. Nichols and Board Members:

The Coalition for Adequate School Housing (C.A.S.H.) appreciates the opportunity to comment on the Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19.

Who Is C.A.S.H.?

C.A.S.H. was formed in 1978 to promote, develop and support the enactment of new statewide and local funding alternatives for school construction and renovation. C.A.S.H.'s membership is a coalition of public and private interests who believe that school facilities are a critical component of the educational process. C.A.S.H. represents nearly 500 school districts serving 92 percent of California's school children.

C.A.S.H. is a leader in the move toward sustainable "green" schools in California and across the country. Among other accomplishments, C.A.S.H. has successfully advocated for inclusion of funding for energy efficiency in statewide school bonds, worked with the School Energy Coalition (SEC) on implementing Proposition 39, developed storm water Best Management Practices for schools, helped develop the Division of the State Architect's (DSA) Landscape Irrigation Efficiency regulations, assisted the State Water Board in developing the Drought Response Outreach Program for Schools (DROPS), and raised awareness and provided training concerning how to successfully manage toxic contaminants in educational environments, including the Healthy Schools Act (HSA).

Thank You For Including Schools

In our letter on the previous version of the Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19, C.A.S.H. urged the

California Air Resources Board (ARB) to *include K-12 schools as an investment priority in the ARB's draft Three Year Investment Plan, with a school specific "one-stop-shop" type of program, or by expanding eligibility for existing programs to allow schools to participate.*

C.A.S.H. would like to commend and thank the Air Resources Board for recognizing and acting on the school coalition's recommendation by including schools in the Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. Specifically, C.A.S.H. supports the revisions in the Final Draft Investment Plan that include schools as "Potential Recipients" for "Draft Investment Concepts" for topics under the three primary overarching priorities of Transportation and Sustainable Communities, Clean Energy and Energy Efficiency, and Natural Resources and Waste Diversion. We also support the inclusion of schools in the Potential Cross-Cutting Approaches for Local Climate Action in Disadvantaged Communities, and Efficient Financing Mechanisms to Maximize Investment.

California's more than 10,000 schools are in every community of every size and type across California, and are the beating heart of local communities. The scope and scale of schools, including but not limited to millions of acres of land and roof tops, thousands of athletic fields and parking lots, and countless waste diversion opportunities, make schools a natural partner for reducing GHGs. Schools are an integral part of all three of the Investment Plan's major areas of focus, including Transportation and Sustainable Communities, Natural Resources and Waste Diversion, and Clean Energy and Energy Efficiency.

In addition to the environmental benefits of saving energy, using less water, and creating healthier learning environments, investments in sustainable schools also provides the co-benefit of reducing ongoing school operating expenses, allowing schools to invest more funding into their primary responsibility of teaching students. Schools also provide excellent teaching opportunities to convey the importance of reducing GHGs, as well as providing opportunities to focus on providing healthy schools in economically disadvantaged communities as per SB 535. More broadly, climate change has significant implications for children – it is their health and future world that is at stake.

Schools as Partners in GHG Reduction

While C.A.S.H. appreciates schools being included in the Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19, we also recommend additional revision that would better enable K-12 schools to access and utilize grants supported by the GHG Reduction Fund for projects that can produce short, medium and long-terms. C.A.S.H. is a signatory to the Green School Initiative's letter to the ARB, which includes specific recommendations and ideas about how schools could participate and contribute to reducing GHGs which C.A.S.H.

supports. These include including the California Department of Education (CDE) on advisory committees, establishing a coordinated and streamlined approach for efficient and effective financing and program delivery, revise financing mechanisms to include schools, support integrated projects with co-benefits, and support investments for Zero Net Energy and Zero Net Water schools. In particular, C.A.S.H. believes in establishing a coordinated and streamlined program for significant school participation.

Finally, C.A.S.H. would like to commend and thank the ARB for including schools as an investment priority in the proposed Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. We believe this would be a win for GHG reduction, as well as public education.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ian Padilla", followed by a horizontal line.

Ian Padilla, Coalition for Adequate School Housing (C.A.S.H.)

CC: Tom Torlakson, Superintendent of Public Instruction
Jeff Bell, Program Budget Manager for Education, Department of Finance
Deborah Moore, Executive Director, Green School Initiative