November 12, 2015

Members of the Board

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**

Dear 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 develop the Drought Response Outreach Program for Schools (DROPS), and raised awareness and provided training concerning how to successfully manage toxic contaminants in educational environment, including the Healthy Schools Act (HSA).

Recommendation - *Include Schools as an Investment Priority*

**C.A.S.H. urges 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**. In addition, C.A.S.H. is a signatory to the Green School Initiative’s letter to the ARB that also recommends that the ARB make schools an investment priority, and includes specific recommendations and ideas about how schools could participate and contribute to reducing greenhouse gases (GHGs).

Concerning the question of why schools should be included in light of Proposition 39, while Proposition 39 is a good program, it is narrowly focused on specific aspects of green schools related to energy efficiency, but does not include other key aspects of green schools (it does not include provisions for drought mitigation and water quality for instance).

Schools as Partners in Reducing Greenhouse Gas Emissions

C.A.S.H. believes that not including schools is a missed opportunity. California’s more than 10,000 schools are in every community of every size and type across the 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.

For these reasons, C.A.S.H. strongly urges the ARB include schools as an investment priority in the the proposed Second Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19 – we believe that this would be a win for GHG reduction, as well as public education.

Sincerely,

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

CC: Mary Nichols, Chair, Air Resources Board

Jeff Bell, Program Budget Manager for Education, Department of Finance

Deborah Moore, Executive Director, Green Schools Initiative