



September 1, 2015
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Attn: Ombudsman

Dear California Air Resources Board:

On behalf of the Collaborative for High Performance Schools (CHPS) I am submitting comments to recommend that K-12 public schools be included as an investment priority for Greenhouse Gas Reduction Fund investments in California Air Resources Board's (ARB's) draft Three Year Investment Plan. We recommend that a new "High Performance Schools" goal be established and supported by a new "Healthy & Sustainable Schools" grant program.

One in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's greenhouse gas emissions from energy and water use, transportation, waste, heat island effects, and more. We support the ARB's goals for sustainable communities and reducing greenhouse gas emissions 40% below 1990 levels by 2030. We believe that California cannot achieve its goals for sustainable communities and greenhouse gas reductions without the participation of the state's 10,300 schools. Schools are the heart of our communities, housing more than 6 million children and thousands of teachers and staff every day. Schools are responsible for about 5% of municipal solid waste or about 763,817 tons per year, about half of which is food waste (contributing to landfill methane emissions) and about one-third is paper waste. Schools have enormous roof and asphalt-covered acreage contributing to heat island effects and polluted stormwater runoff. Dirty diesel school buses spew black carbon, increasing vulnerable children's exposures, according to ARB's own studies.

In contrast, healthy, high performance schools reduce carbon footprints substantially, save scarce funds, and engage millions of students, teachers, staff, parents, and school board members in learning about and practicing environmental sustainability, and preparing students for green careers and civic responsibility. For a modest size school district with 9,600 students, the EPA WARM model predicts that switching the bus fleet to biodiesel can save 582 M tons CO₂, increasing the recycling rate from 30% to 35% can save 461 MT CO₂, and adding 32,000 square feet of photovoltaics can save 441 MT CO₂, for a total of 1,484 MT CO₂ for one school district.

CHPS Board of Directors

Chair

Carolyn Sarno
Northeast Energy Efficiency Partnerships

Vice Chairs

Jessica Mack
Southern California Edison

Sean O'Donnell
Perkins Eastman

Treasurer

Lori Raineri
Government Financial Strategies

Secretary

John Sumlin
Tandus - Centiva

Gary Becker
Sacramento Municipal Utility District

Caroline J. Brown
Solana Beach School District

Christos Chrysioliou
Los Angeles Unified School District

Art Dawson
Adams 12 Five Star Schools

Ken DaRosa
CA Dept. of Resources Recycling and Recovery

Chip Fox
San Diego Gas and Electric

Maureen Guttman
Building Codes Assistance Project

Scott Harrison
TXU Energy

Aaron Jobson
Quattrocchi Kwok Architects

Duane Kashiwai
Hawaii Department of Education

Chin Lin
HMFH Architects

Andrew McAllister
California Energy Commission

Gwenn McDaniel
Johnson Controls

Roy Sprague
Cypress Fairbanks ISD

John Zinner
Zinner Consultants

Special Advisors to the Board

Claire Barnett
Healthy Schools Network

Charles Eley
CHPS Founding Executive Director

Jim Ogden
3QC

Kurt Siggard
Concrete Masonry Association of California and Nevada

Executive Director

William R. Orr

The Collaborative for High Performance Schools

520 9th Street, Suite 100, Sacramento, CA 95814 | p: 415.957.9888 | f: 916.668.6886 | www.chps.net | info@chps.net

If all 1,000 California school districts invested in integrated projects to reduce greenhouse gas emissions, they would contribute millions of tons of savings.

Schools are the perfect local venue to invest in integrated projects that produce numerous co-benefits, including: active transportation (Safe Routes to School); zero emission school buses; recycling and composting; tree planting and asphalt removal to reduce heat island effects and create green schoolyards and outdoor classrooms; cool roofs; energy and water conservation; stormwater capture; and other measurable greenhouse gas reduction projects. And these projects can also serve as visible, hands-on sustainability learning tools for students and the community. Several school districts and individual schools in California are leaders in sustainability. But the majority of schools – and especially those in disadvantaged communities – have outdated, inefficient, unsustainable buildings, grounds, and operations that contribute to climate change.

ARB's Draft Three Year Investment Plan does not include K-12 schools as an investment priority for greenhouse gas reductions – a big gap. The word “schools” appears only once on page 11 of the draft Plan. There is one existing program under ARB's Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP) that includes grants for rural school districts to invest in lower-emission school buses, and should be continued. Other grant programs, such as the Organics and Recycling programs managed by CalRecycle and the Urban Forestry tree planting programs managed by CalFire, do not include school districts as eligible applicants (though they could apply with non-profit or local government partners; in reality school participation has been low). Proposition 39 provides funding for energy efficiency and renewables at existing K-12 schools, but does not cover other greenhouse gas reduction projects like transit, composting, tree planting, or asphalt removal. And the estimated funds needed to fully achieve “zero net energy (ZNE)” and “zero emission” schools are an order of magnitude beyond the funds available and scope of Proposition 39.

We urge ARB to include “High Performance Schools” as an investment element in its Three Year Investment Plan 2016-2019 and to ensure that K-12 public school districts – especially those in disadvantaged communities designated by CalEPA – are eligible to receive GGRF funds via existing or new grant programs. While we recognize that K-12 schools do not fall under the Administration's jurisdiction, healthy, high performance schools are critical to achieving the State's greenhouse gas reduction goals. Currently, the barriers for K-12 school districts to pursue greenhouse gas reduction funds are too high, requiring separate complex applications and reporting to different agencies, and managing separate partnerships in order to be eligible.

We recommend the establishment of a “Healthy & Sustainable Schools” integrated grant program for school-based climate action projects with a single coordinating agency that could coordinate the review of particular school district greenhouse gas grant applications with the other relevant state agencies (ARB, CalRecycle, CalFire, etc) and administer funds to public school districts. Priority would be given to support greenhouse gas reduction projects at school districts in disadvantaged communities. This program could build on existing partnerships between ARB (like the HVIP), California Department

The Collaborative for High Performance Schools

of Education, California Energy Commission (partnering on Prop 39), California State Water Board (Drought Response Outreach Program for Schools/DROPS), and others. ARB can also consider other means of including K-12 schools and districts in its investment priorities, whether through strengthening existing programs, changing eligibility requirements of existing programs, and/or including schools in other programs aimed at achieving Sustainable Communities.

CHPS is a national non-profit headquartered in Sacramento, dedicated to making every school an ideal place to learn. The California CHPS (CA-CHPS) Criteria has been the standard for healthy, high performance schools in California since 2002. The new 2014 CA-CHPS Criteria www.chps.net/california embraces a design toward ZNE paradigm and creates a pathway toward ZNE for new schools and 50 percent of existing schools by 2030.

Thank you for your consideration of our comments to include schools as part of California's solution for mitigating climate change.

Sincerely,



William R. Orr
Executive Director

cc: CHPS Board of Directors
Deborah Moore, Green Schools Initiative