



Comment on California Air Resources Board Draft 2022 Scoping Plan

June 23, 2022

California has been a national leader in setting goals and taking action to mitigate the impacts of climate change. However, if we do not set clear priorities, benchmarks, and milestones for decarbonized and climate-resilient public school buildings and grounds, in alignment with the state's 2045 climate goals, then we will put those vital goals at risk – and we will undermine the learning, health, and well-being of our 5.9 million students and 650,000 teachers and staff.

California's 10,545 TK-12 public schools [encompass about](#) 125,000 acres of land and more than 730 million square feet of buildings, making them one of the largest sectors of public infrastructure. [California spends \\$15 billion every year](#) on building, maintaining and operating its school facilities without aligning those investments with our goals for carbon neutrality and climate resilience. The operation, maintenance, and upgrading of these buildings involves a patchwork of local and state funding and responsibilities.

In order to ensure that those investments work towards the state's 2045 goals, and not against them, we urge you to consider the following amendments to the scoping plan:

- 1. Name and prioritize K-12 public school buildings and grounds in this scoping plan.**

While the scoping plan names the need to decarbonize residential and commercial buildings, it does not refer to public school buildings and grounds. While California Green Building Standards Code (Title 24: Part 11) may eventually require that new school buildings be net zero, districts are neither on a date-certain timeline to eliminate fossil fuel systems and equipment from schools nor to address climate resilience in our buildings and grounds. This is also true of ongoing maintenance and operations to existing buildings. School facilities are funded through both state and local sources, and they are typically [left out of](#) greenhouse gas emissions-reduction laws that have compelled action by cities and counties; as a result, school facilities investments that can have lifespans of over 30 years are being made without consideration for the state's 2045 goals. Calling out school buildings and grounds in the scoping plan will send a powerful message to education leaders about their role in meeting the state's goals as they make decisions about \$15B each year.

2. **Prioritize both decarbonization and climate resilience in school facilities investments.** Outdated buildings have profound implications for children and teachers' health, harming all students and aggravating racial inequities. Students spend approximately 16,000 hours of their lives in school from Kindergarten through 12th grade, making schools second only to the home for children's indoor exposure. The effects of climate change, including extreme heat and wildfire smoke, impact students' ability to learn, and many schools are not equipped with air filtration and electric cooling mechanisms in schools to protect students from these dangers and to keep schools open during peak instances of heat and smoke. Anxiety, disruption and trauma lead students to disengage from school. Lost school days have been shown to diminish learning as measured by standardized test scores. We must ensure that school buildings and grounds are both decarbonized and climate-resilient to protect students from the worsening effects of climate change in our state and to keep schools open to promote student health and learning.

3. **Ensure school district leaders are actively engaged in local planning processes.** Appendix D discusses the importance of local planning and coordination around decarbonization planning. However, when city and county leaders develop climate action and adaptation plans, K-12 schools are not obligated to comply, and are often overlooked in the planning process. We must name and ensure that K-12 education leaders are a core part of local planning and decision-making to ensure that their facilities and grounds investments are aligned with both state and local goals.

4. **Ensure school infrastructure investments in response to COVID-19 align with state climate goals.** For the next 5 years, schools will be upgrading HVAC systems using a mix of federal, state, and local dollars to ensure schools have proper ventilation to mitigate the impacts of COVID-19. Without clear guidance or mandates, many districts will install new fossil-fuel driven HVAC systems that have lifespans of 25-30 years. In order to meet California's statewide goals, the state needs to ensure that these once-in-a-generation investments in school HVAC systems require electrification and meet strong standards aligned with climate goals. Please contact us if we can be helpful by providing more detailed guidance and language to support this goal.



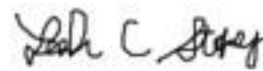
Jonathan Klein
Co-Founder
UndauntedK12



Karen Cowe
CEO
Ten Strands



Tiffany Mok
Legislative Representative,
California Federation of
Teachers



Leah Stokes
Senior Policy Counsel
Rewiring America