



November 8, 2021

Lianne M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

**RE: Draft Final Cap-and-Trade Auction Proceeds Fourth Investment Plan
Fiscal Years 2022-23 through 2024-25**

Dear Chair Randolph,

The California School Boards Association (CSBA) is a nonprofit education association representing the elected officials who govern public school districts and county offices of education in California. We have a membership of nearly 1,000 local educational agencies (LEA), bringing together school governing boards and administrators from districts and county offices of education to advocate for effective policies that advance the education and well-being of the state's more than 6 million school-age children.

We appreciate the opportunity to provide our comments in response to the Draft Final Cap-and-Trade Auction Proceeds Fourth Investment Plan. Recognizing that the K-12 educational community has not been significantly involved in these discussions in past years, we hope to serve as a resource for the California Air Resources Board (ARB) and others on how schools can help address and solve one of the most pressing challenges we collectively face: climate change. Climate change affects us all. We see and experience it daily in our schools, from extreme weather events to inadequate and inefficient school facilities, air pollution and the ongoing efforts to reduce the emissions of our school bus fleets. With the proper resources and support, we believe that schools and their environments can play an integral role in our shared effort to combat climate change.

School districts and county offices of education across the state lack the necessary funding to confront the impacts of climate change, and most do not have the requisite staff and resources to dedicate to holistic efforts to identify, apply for and acquire funding to implement climate resilient programs such as those funded through cap-and-trade revenues. While these funds can provide critical support for our schools, the investment plan is being developed at a time when, due to the pandemic, school administrators, teachers and staff are working tirelessly to provide a safe and healthy educational environment and to prepare for the expected vaccine mandate—all amidst a severe teacher and staff shortage. In fact, many LEAs have been forced to assign credentialed administrators as substitute teachers, pulling them from their regular day-to-day duties supporting our students, teachers and surrounding communities. This has and will continue to restrict the ability of LEAs to adequately respond and apply for available cap-and-trade programs and funding.

As a result, we strongly urge the ARB to provide recommendations that programmatic monies be specifically set aside for outreach and supports for LEAs. These efforts would help tremendously to inform school districts that funding is available and provide the technical assistance necessary to apply for and implement funding, if awarded.

In recognition of the equity goals interwoven into the fourth investment plan, many LEAs serving low-income and underrepresented communities overlap with those areas that are overburdened by multiple areas of pollution and are disproportionately impacted by the consequences of climate change. Schools serve as centers of their communities where children, families and members of the public gather beyond the school day, including before- and after-school services, extracurricular and interscholastic athletic activities, and community programs. Prioritizing funding for schools will have a multitude of benefits for their surrounding communities. Many LEAs in low-income and underserved areas, including small and rural school districts, would benefit greatly from targeted outreach and funding set asides that remove the additional challenges they face in applying and competing for funding.

Therefore, we urge the ARB to recommend funding set asides specifically for LEAs in low-income and underserved communities, recognizing the compounded vulnerabilities they have to the impacts of climate change. This funding should be in addition to and not counted toward the Proposition 98 guarantee for education funding.

CSBA is also requesting the ARB consider making recommendations within the draft fourth investment plan to provide specific and increased funding for:

- **School Facilities Projects** – Schools represent the second largest portion of America’s infrastructure¹, yet LEAs historically and consistently face ongoing facility-based budget deficits. They operate at the mercy of whether the Legislature successfully places a school facilities bond on the ballot, and whether voters approve that bond. When bonds are not approved, as happened with Proposition 13 in 2020, it places districts in the incredibly difficult scenario of being forced to decide whether to divert funds from other important educational programs to address facilities needs. Providing specific and increased funds for LEAs will accelerate the modernization of school facilities, the improvement of heating, ventilation, and cooling (HVAC) systems, the installation of solar power generation, and other energy efficiency projects.
- **Converting School Bus Fleets to Hybrid and Electric** – LEAs have never fully recovered from the practical elimination of California’s Home-to-School Transportation Funding Program during the Great Recession. Many districts continue to struggle to provide basic transportation services for children and operate fleets that are ten years old or more. Increased and specific funding for LEAs during these difficult times will go a long way towards realizing a full transition away from diesel buses to electric and hybrid bus fleets. We also want to highlight that, for smaller suburban and rural school districts, converting to

¹ American Society for Civil Engineering. A Comprehensive Assessment of American’s Infrastructure: 2021 Report Card for America’s Infrastructure. Page 118. https://infrastructurereportcard.org/wp-content/uploads/2020/12/National_IRC_2021-report.pdf

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fully electric buses can be an unrealistic option due to the lack of battery capacity to cover long distances and the challenges of operating electric charging stations in the more rural areas of the state. Other districts, however, consider this a viable strategy for addressing climate impacts, and we appreciate the availability of funding for hybrid buses and encourage this funding be significantly expanded.

- **The Expansion of Urban Greening at School Sites** – Maintaining and developing school grounds that can help with the sequestration of carbon from our atmosphere through the planting of trees and other plants is a significant challenge for LEAs. Many rely upon community partners and philanthropic fundraising efforts to initiate tree planting and other greening efforts, which can come at a significant cost and be limited by irrigation infrastructure and water needs. As a result, many schools sites both in urban and rural areas struggle to provide adequate tree cover and access to native vegetation. Increased funding specifically for LEAs will help expand awareness and understanding of the natural environment for students who would otherwise lack access to green spaces. The multitude of benefits of increased green spaces on school campuses includes science-based and outdoor lesson plans, benefits to mental health and the wellbeing of our students and improved sequestration of carbon. Again, this represents an area in which the disproportionate challenges facing low-income and underserved communities should be considered in relation to the equity goals of the fourth investment plan.

These recommendations would align with the draft funding priorities, especially the priority to provide dedicated funding to advance equity, environmental justice, and community participation. They would also meet the goals of building capacity and providing outreach and education, technical assistance with conducting needs assessments and community-based planning.

Lastly, elevating funding for LEAs is foundational. Investing now in LEAs will help schools to become a good model for environmental stewardship and sustainability and shape the next generation of leaders who can continue the fight against climate change.

CSBA appreciates the opportunity to provide comments on the Draft Final Cap-and-Trade Auction Proceeds Fourth Investment Plan and is committed to working with you to combat climate change. If you have questions regarding our position, please feel free to contact Cheryl Ide at cide@csba.org.

Sincerely,



Chris Reefer

Legislative Director, Office of Governmental Relations

Cc: David Garcia, Director of Government Relations, CARB
Andrew Tsiu, Legislative Analyst, Office of Government Relations, CARB