

Air Quality Sciences, Inc. is submitting this document to provide comments on the recently drafted *Report to the California Legislature on Indoor Air Pollution in California* (AB 1173). Please see comments below.

- A Relatively low priority is placed on the problem of water infiltration and resultant mold/microbial growth in homes, schools and other non-industrial spaces. Many Studies have shown that asthma and other respiratory symptoms can occur among persons occupying chronically damp or water damaged buildings.
- Although listed as a major indoor air pollutant, strategies for prevention, mitigation and regulation of biological pollutants are not included in the report.
- Water damage in buildings and the associated microbial growth is often the result of inappropriate design and construction or poor maintenance. These problems are especially troublesome in schools where deteriorating buildings and reduced budgets create the potential for water infiltration problems to go unreported and unrepaired. Additional information on the prevalence of chronically damp buildings (especially schools) in California would be useful.
- The report does not discuss guidelines, public education, prevention, prioritization or mitigation strategies for water infiltration and the resultant mold colonization within buildings.

Please consider the following additions to the AB 1173 report:

- In section “V. Existing Regulations, Guidelines and Practices” under the heading Guidelines and Public Education, generally accepted guidelines for the identification, control and removal of mold colonization in buildings should be included. (Ex. EPA Mold remediation in Schools and Commercial Buildings, AIHA Report of Microbial Growth Task Force, Etc.)
- In section “VI. Methods to Prevent and Reduce Indoor Air Pollution, “ a paragraph should be included that discusses reduction of indoor air pollution by design and construction. Proper HVAC and envelope design play an important role in limiting water infiltration in buildings. Thorough construction management can help to limit water damage to materials during construction. Proper inspection during construction and thorough commissioning can help to prevent future water infiltration issues.
- In section “VII. Prioritization of Indoor Sources Based on Exposure and Adverse Impacts” microbial contamination due to water infiltration should be added to the prioritization list of indoor pollutant sources (Table ES-3). Potential mitigation strategies could include improved design and construction, improved operations and maintenance, etc.

- In section “VIII. Options to Mitigate Indoor Air Pollution,” mitigation strategies applicable to chronically damp buildings should be included.