Thank you for your comments. They are being forwarded to the Docket to be logged in for consideration.

The Council for Watershed Health has been actively participating in sustainable and efficient landscape planning on institutional landscapes for the last decade. We’ve read the California Energy Commission’s California Clean Energy Guidelines Jobs Act Implementation Guidelines, and we commend you for focusing on several Green Infrastructure solutions to our Grey Infrastructure problems.

We all understand that there are multi-benefit answers to energy efficiency problems and we think that by providing better examples of High Efficiency Cost-effective K–12 School Energy Projects (Exhibit B), you will inspire higher efficiency projects that ensure long-term results.

Recommendations are as follows:

Exhibit B:

Water-Efficiency Measures

1. As stated: "Install drip irrigation systems."
   Recommendation: Edit to read "Irrigation system repairs and efficient irrigation upgrades."
   Justification: Drip irrigation is problematic on school grounds. It requires a level of maintenance and expertise in operations not often found on school grounds. Solutions like weather-based irrigation controllers, rotating sprinkler nozzles, soil moisture sensors are more effective on these sites.

2. As stated: "Install low-flow plumbing fixtures."
   Recommendation: Edit to read "Install high-efficiency plumbing fixtures"
   Justification: Some urinals are no flow. A more inclusive term is "high-efficiency".

3. As stated: "Plant native, drought-tolerant plants and landscaping."
   Recommendation: Edit to read "Plant native, climate appropriate plants."
   Justification: "Drought tolerant" isn't used much in the trade any longer. The term promulgates poor care. Some natives and climate appropriate plants might survive drought, but still require infrequent and deep watering in the dry season to perform in the long term.

Miscellaneous

2. As Stated: "Plant deciduous shade trees on south side of buildings."
   Recommendation: Edit to read "Plant shade trees on the south and west side of buildings."
   Justification: Trees are great for cooling schools and buildings, they are also important for reducing harmful UV radiation exposure on school grounds. In many parts of the state, shade is needed year-round as high heat days are not limited to
the Spring and Summer, evergreen trees are better for that. Because afternoon is when temperatures are often highest, west facing aspects are also important to shade.

Add to Miscellaneous:
"Remove low reflectance (albedo) asphalt and replace with landscaping or cool paving materials to reduce immediate air temperatures and mitigate urban heat island"

"Install cisterns and rain gardens that reduce reliance on energy intensive imported water"

Thanks for all your hard work on this initiative and thanks for considering these comments.

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