

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Richard Addington, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

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I Francis J. Moran Jr., member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

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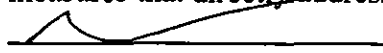
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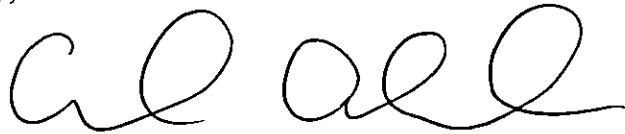
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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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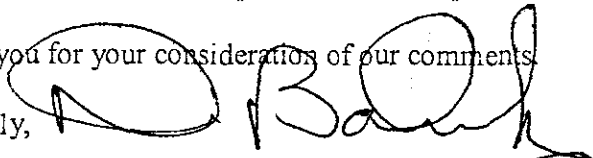
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



NUGLOBO@GMAIL.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Christian Beshnick member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan B. B. B.", written in black ink.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Chris Beavers, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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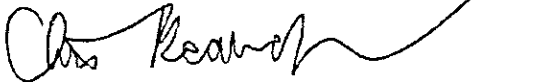
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Thank you for your consideration of our comments.

Sincerely,



Email:

Jayleneobenhens@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'NLJ Birdsell', written in a cursive style.

NLJBIRDSALL@HOTMAIL.COM

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Michael Blair, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Thank you for your consideration of our comments.

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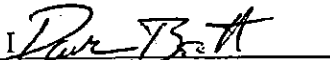
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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I JOSEPH BULLARD, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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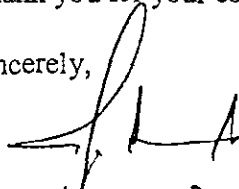
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Thank you for your consideration of our comments.

Sincerely,

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JOSEPH BULLARD
PRESIDENT

BULLARD'S HEATING & AIR

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Isaac Camarero, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

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1516 Ninth Street
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The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Kearney", with a long horizontal line extending to the right and a vertical line at the end.

kcarmitchael89@yahoo.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Michael Carmo, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



MCarmos080@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Xavier Carrasco member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



Email:

Xcarrasco.xc@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jason Cavallari, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

1 STEVE CHASE, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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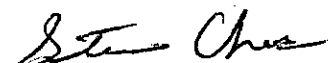
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "James G. Clancy". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

GrClancy@AccoEs.Com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Michael Clay, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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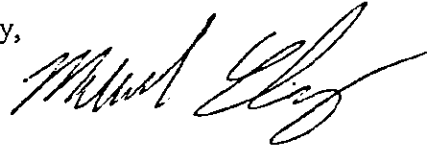
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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Michael Clay 169@yahoo.com

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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Nicholas Clayton, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retro fits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I STEPHEN GUNTER member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,



SJCLIMATE@GMAIL.COM

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October 25, 2013

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Sincerely, *Joshua Colvin*

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "James Corbett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

JAMESFRESNOA8@YAHOO.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jane Cortez, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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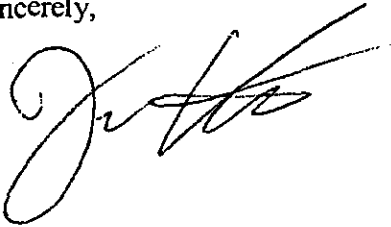
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Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jarret Coutour, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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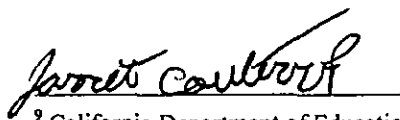
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Thank you for your consideration of our comments.

Sincerely,



janetcoultruf@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Timothy R. Cox Jr., member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

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carbetinjc@hotmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Donovan Daly, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Thank you for your consideration of our comments.

Sincerely,



donovandaly@aol.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I, Jeff Daugherty, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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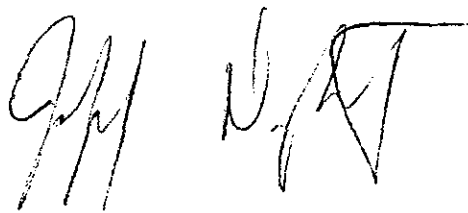
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jason Davis, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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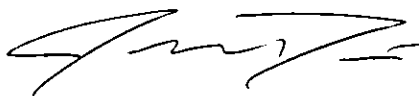
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Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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I Jason Davison, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. D. 27.27". The signature is stylized and somewhat cursive.

John.P.D.27.27@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I William DeWitt, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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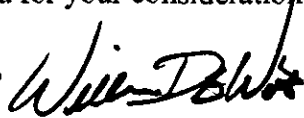
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Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jack Dorfer, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



jedorfer@comcast.net

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Stephen Van Dorst, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



svandbrst1@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jacob Drain, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Jacob Drain".

Jacob_Drain@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

Sai DUJIAN, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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clean energy jobs

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, Sai DURIAN

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Robert Dinkley, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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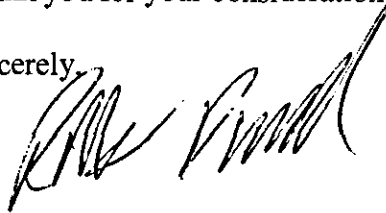
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Thank you for your consideration of our comments.

Sincerely,

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209-588-6342

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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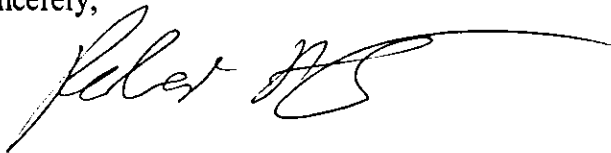
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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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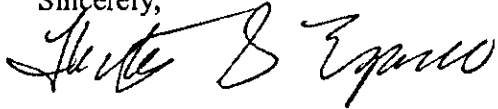
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California Energy Commission
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Docket Number 13-CCEJA-1

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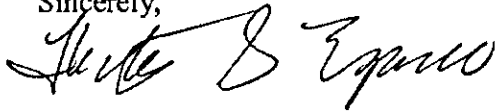
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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Trevor Ferguson, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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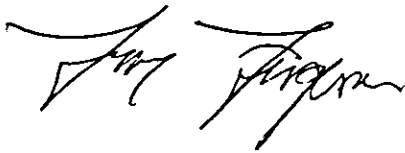
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I ANDREW FERRALES member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'AFERRALES', written over a horizontal line.

Email:

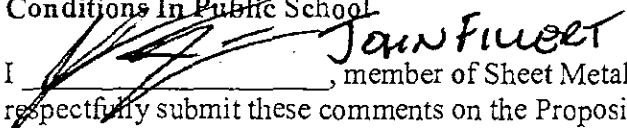
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October 25, 2013

California Energy Commission
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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

 I, Jean Finckel, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



JOHN FILLBERT

JOURNEYMAN SHEET METAL

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

¹ Jacob Fine, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



Email:

jwfine86@gmail.com

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Email: GREGFLORES615@GMAIL.COM.

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The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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ay.k.fong78@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Joseph Frech, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

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joewon@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I BRAD FEERZ, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

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Email: bfretz11@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I GARY GOLDBERG, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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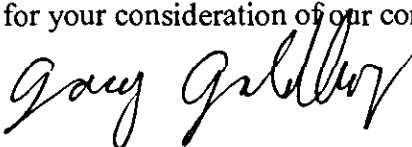
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Thank you for your consideration of our comments.

Sincerely,



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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I MANUEL GONZALEZ, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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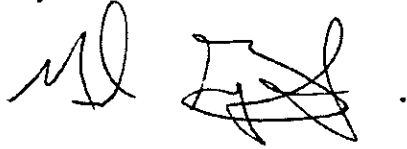
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Thank you for your consideration of our comments.

Sincerely,

Handwritten signature of Manny Fresh, consisting of a stylized 'M' followed by a more complex, scribbled signature.

MANNYFRESH1980@YAHOO.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Bruce Good, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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ANDREW.BROWN TBE gmail.com

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October 25, 2013

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1516 Ninth Street
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Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements:

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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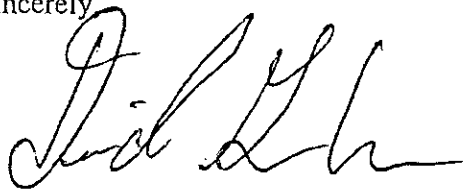
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely



big-guy94509@yahoo.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I *Armando Guerrero* member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Thank you for your consideration of our comments.

Sincerely,

Armando Guen
1armandog@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I THOMAS HAMPTON, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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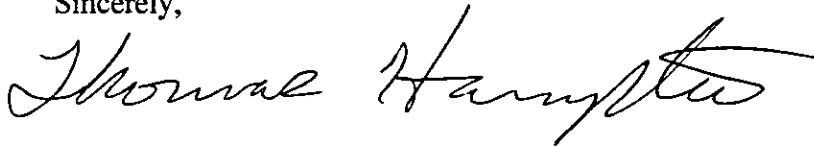
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Hampton". The signature is written in black ink and is positioned below the word "Sincerely,".

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Eric Hansard, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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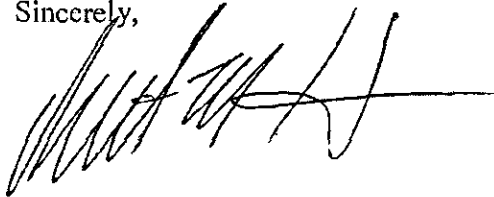
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Sincerely,

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bobh@smw104.org

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October 25, 2013

California Energy Commission
1516 Ninth Street
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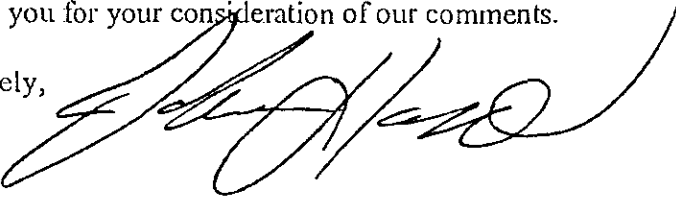
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Thank you for your consideration of our comments.

Sincerely,



Haro.joshua@yahoo.com.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I NATHAN HARRIS, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,

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10/24/13

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Eric E Hatfield, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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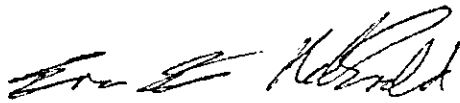
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Thank you for your consideration of our comments.

Sincerely,



EHat75@aol.com

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October 25, 2013

California Energy Commission
1516 Ninth Street

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Submitted by E-mail to: docket@energy.ca.gov

Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Curtis R. Heaven II, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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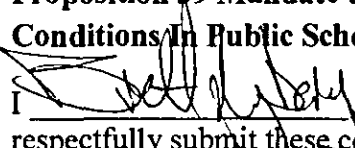
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October 25, 2013

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1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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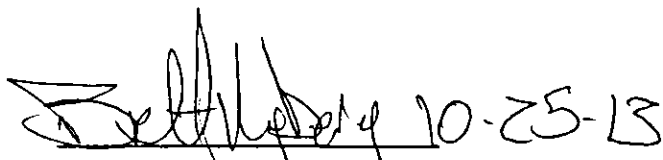
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The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Joe Hernandez".

JD.Hernandez 22@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I, JOE Hernandez, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Joey Hernandez, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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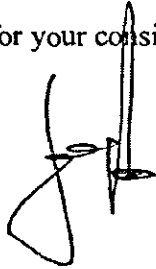
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Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Andrew Hood, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Submitted by E-mail to: doCKET@energy.ca.gov
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Sincerely,



Moto Sprouts @ Gmail . com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jeffery Hultman, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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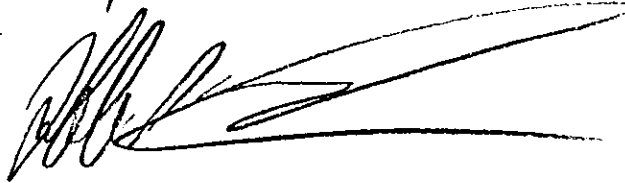
the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

Jeffery Hultman

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

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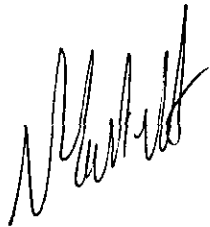
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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'Matthew Wille', written in a cursive style.

Matthew.wille@hotmail.com

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Mark J. J. J., member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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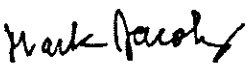
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, 

Email: MARKJACOBY2@YAHOO.COM

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I BRANDON JAMES, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

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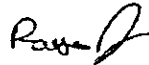
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Docket Number 13-CCEJA-1

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I Michael Jerila, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of



MJERILA @ HOTMAIL.COM

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² Gordon & Barba, Proposition 39 White Paper: Investing in California's Future at p. 9, http://thenextgeneration.org/files/Prop39_Investing_In_California.pdf.

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



Email: [MJERILA @ HOTMAIL.COM](mailto:MJERILA@HOTMAIL.COM)

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Lonny Johnson, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I James Kane, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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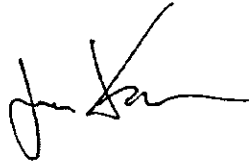
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Sincerely,



Email:

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October 25, 2013

California Energy Commission
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Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

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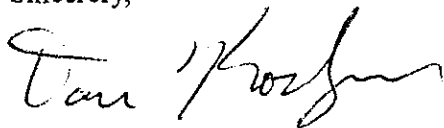
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Thank you for your consideration of our comments.

Sincerely,

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Alex Lahada, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

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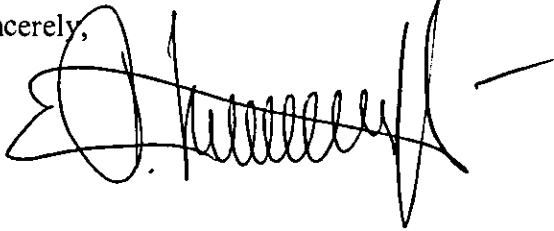
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Heriberto Lara, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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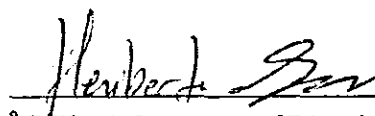
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Thank you for your consideration of our comments.

Sincerely,

 laraheberto@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Tony Ledoux member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,



Tony Ledoux

Email: tonysmw@sbcglobal.net

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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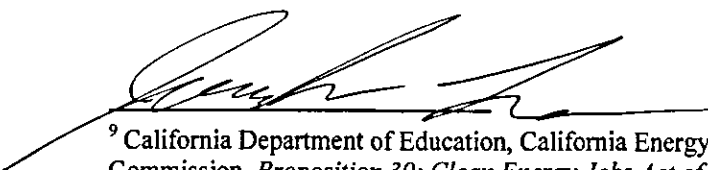
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Thank you for your consideration of our comments.

Sincerely,



Jacob Lee



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October 25, 2013

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1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Mark Lenzi, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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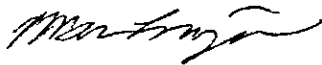
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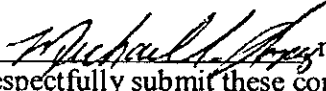
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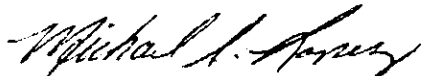
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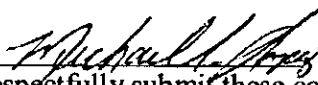
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Submitted by E-mail to: docket@energy.ca.gov
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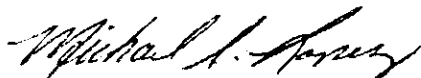
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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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⁷ Ibid.

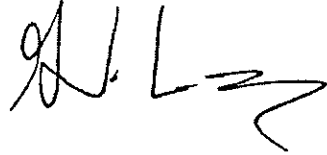
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



agentjoh@yahoo.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School.

I RONALD MAFUL, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be a stylized name, possibly "Roni".

RONERMIHVAC.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Michael Mark, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



Michael - mark @ me.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I PAUL MARTINS, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely, 

Email: paulmartins@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

Brian A. Myles, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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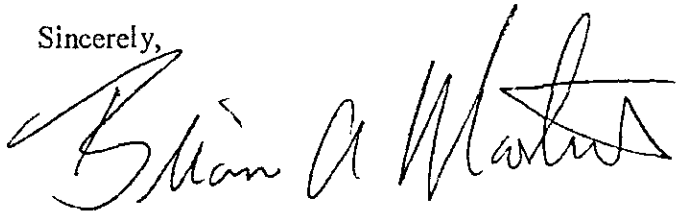
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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Brian A. Martin". The signature is fluid and cursive, with a large initial "B" and a stylized "M".

BrianM@smw104.org.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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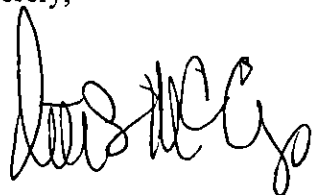
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Chris McCormick, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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Thank you for your consideration of our comments.

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TinknockerChris@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Richard McClellan, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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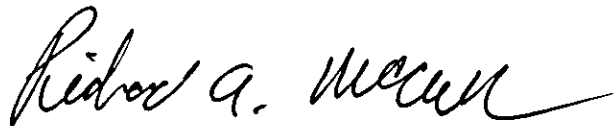
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Sean W. McDevitt, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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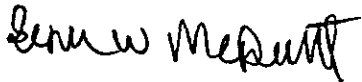
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Thank you for your consideration of our comments.

Sincerely,

Sean McDevitt



Srmpvtt@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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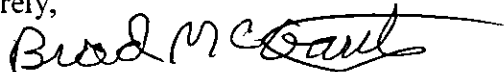
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Kurt Meyn, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

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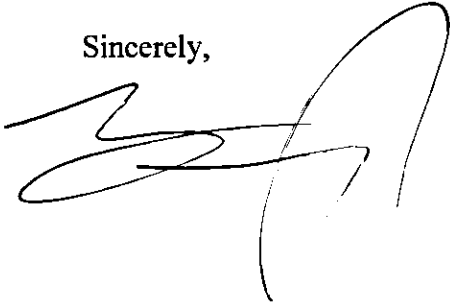
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Paul J Miller, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,



pjmiller870@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I DAVID MILLS, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dante', with a stylized flourish extending to the left.

DANTEACH21@YAHOO.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Sincerely,

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ssaipelle@sheetmetaltraining.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I JEFF MORAN, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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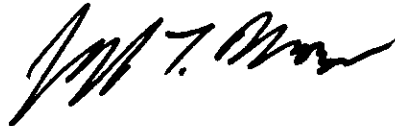
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Thank you for your consideration of our comments.

Sincerely,

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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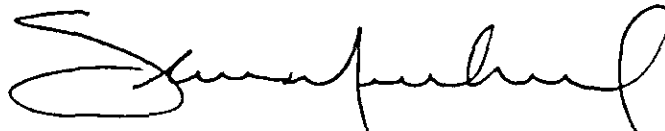
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Thank you for your consideration of our comments.

Sincerely,



STM988@AOL.COM

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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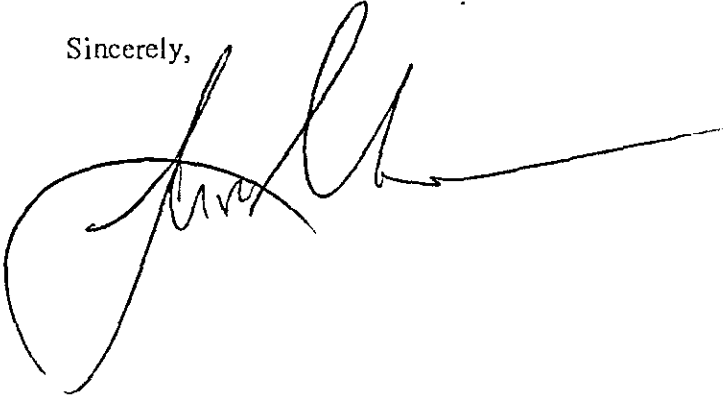
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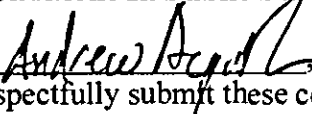
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Docket Number 13-CCEJA-1

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I  member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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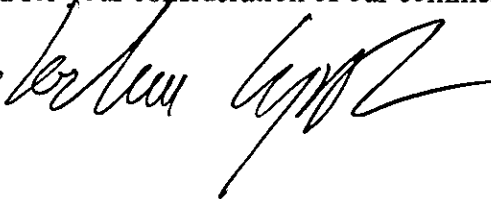
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lester Hunt", written over the word "Sincerely,".

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I, *Mike Mahon*, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,


mike Olinger 5@Ad.com.

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October 25, 2013

California Energy Commission
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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Erin Olsen, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,

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Email:

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RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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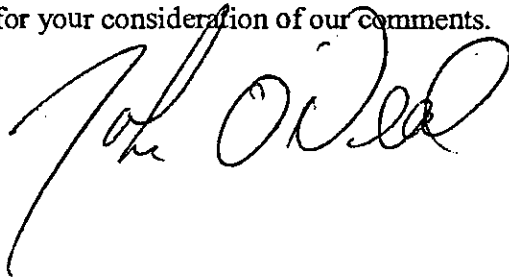
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Thank you for your consideration of our comments.

Sincerely,

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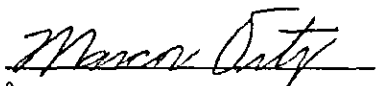
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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I *Barb O'Connell* member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bart Owens".

Email:

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I *Stephen Orens*, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Thank you for your consideration of our comments.

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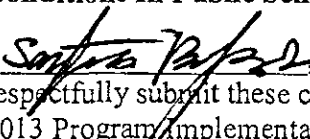
Stephen.Owens1986@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I  **STEPHEN PARKER**, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

STEVEN PARKER
SUBET METAL
WORKER

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Sincerely,


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October 25, 2013

California Energy Commission
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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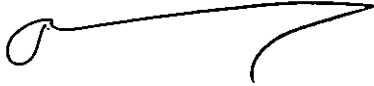
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the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Alex Perzhu, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Doug Lake, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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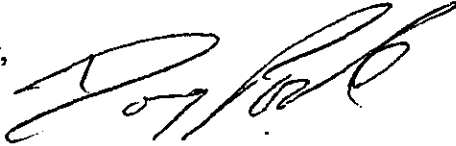
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Linda S. Powers, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Linda Powers". The signature is written in black ink and is positioned below the word "Sincerely,".

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Melinda Pritchard, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, 

Email: JREITSM@COMCAST.NET

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Antonio Reyna, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

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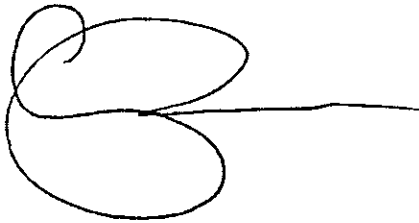
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'S' shape with a horizontal line extending to the right.

gmant2020@yahoo.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I AARON REZENDES member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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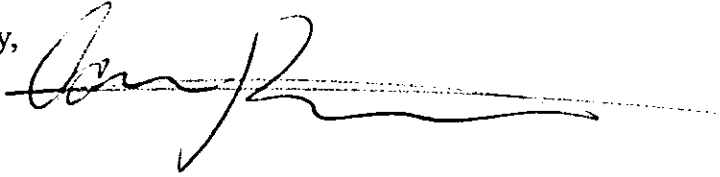
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Rezentes', with a long horizontal flourish extending to the right.

AARON REZENTES@GMAIL.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 -- Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I MIKE RIBLE, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Kyle Richey, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Kyle_209_Richey@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

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the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

Handwritten signature of Benjamin A. Rivera in cursive script.

bmriviera2002@yahoo.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School'

I EDWARD A. ROBES, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Daniel Rosales, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,



Email:

Rosales986@gmail.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Joseph Rowland, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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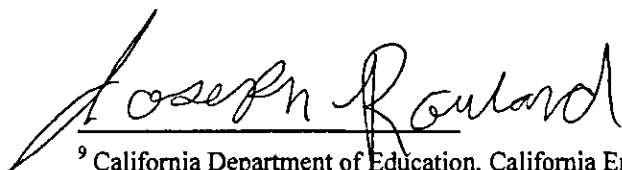
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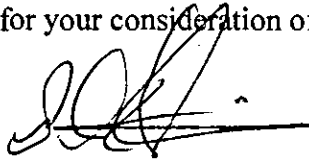
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Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, 

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I JOSHVA SALAZAR, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, JOSHUA M. SALAZAR

A handwritten signature in black ink, appearing to read "Joshua M. Salazar", with a long horizontal flourish extending to the right.

GETTWISTEE3@YAHOO.COM

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
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Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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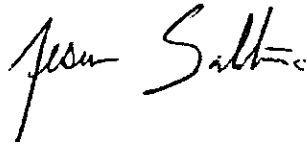
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Thank you for your consideration of our comments.

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Thank you for your consideration of our comments.

Sincerely,

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JSALVOTTI@GMAIL.COM

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October 25, 2013

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ANTHONY SANDILLO

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Torrynman", written in a cursive style.

TORRYNMAN

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I JOE SEALEY, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Sean James, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

Sean James omp4@att.net

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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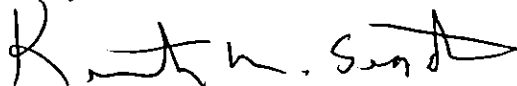
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Email:

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October 25, 2013

California Energy Commission
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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Stiles". The signature is fluid and cursive, with a large, rounded flourish at the end.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

Ronny Simmons

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I *Ronny Simmons* member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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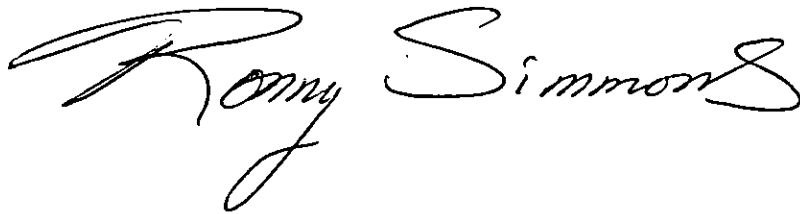
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Thank you for your consideration of our comments.

Sincerely,

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⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I *Rusty Simons* member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Pano Skondras, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'RGA', written over a horizontal line.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Wilbert Solis, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

Sincerely,

Handwritten signature of Wilhel Solis in cursive script.

willies@smw104.org

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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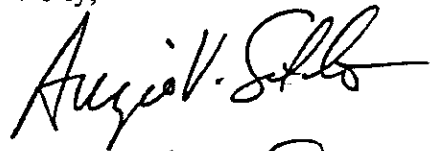
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,



augies@smw104jetc.org.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I JUSTIN STEDMAN, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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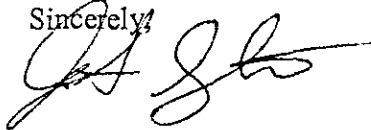
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Thank you for your consideration of our comments.

Sincerely,



jrstedman87@yahoo.com

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Robert Stoker member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Stoker", with a long horizontal flourish extending to the right.

Robert Stoker

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Victor Torrealba, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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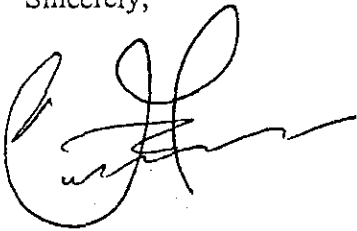
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Thank you for your consideration of our comments.

Sincerely,

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VICT@SMW104.ORG

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October 25, 2013

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1516 Ninth Street
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Docket Number 13-CCEJA-1

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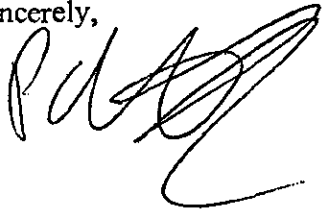
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the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be "PdA" followed by a stylized flourish.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Jeremy Ures, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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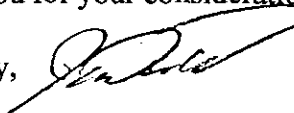
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,


916-968-6394
Jeremy.Ures@gmail.com

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: doCKET@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

Nathan Henderson member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Nathan Humison". The signature is written in a cursive style with a large, prominent "N" and "H".

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.

October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I German Valdivia member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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these conditions on school performance is even more dramatic. One study found that improving a school's health and safety standards can lead to a 36 point increase in California Academic Performance Index scores.⁵ Even when controlled for socio-economic status, students in schools without sub-standard ventilation, lighting and noise levels perform 5 to 17 percentage points better.⁶ The economic benefit to the state from increased attendance and better educated graduates cannot be overstated.

Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Kevin VanBuskirk, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

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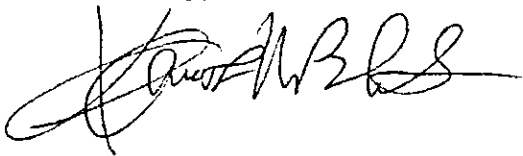
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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin VB', with a large, stylized flourish extending to the left.

KEVIN VB@SMW104.ORG

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I ~~MARK VON DEN HEUVEL~~, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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mark@smw104.org

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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Alan Vincent, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

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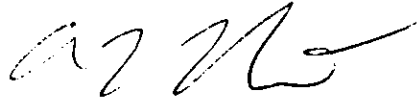
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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

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Vincent.alan@gmail.com

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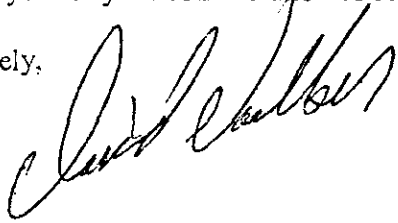
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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

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We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

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We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely, *note whitaker*

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

1 Charles Wilson, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

Across the state, California schools have been forced to delay facilities maintenance and improvements due to years of budget shortfalls. As a result, most classrooms have insufficient ventilation and lighting, disruptive noise levels, and harmful levels of toxins and irritants.² These conditions have been directly correlated with high levels of illness and absenteeism and depressed test scores.³

The American Lung Association has found that American school children miss more than 14 million school days a year because of asthma worsened by poor indoor air quality.⁴ These student absences have long term effects for school district budgets as a whole. The effect of

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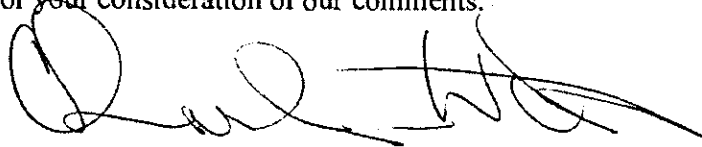
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Thank you for your consideration of our comments.

Sincerely,

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Joe Winn, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

I Steven Wingsted, member of Sheet Metal Workers' Local 104 and concerned citizen respectfully submit these comments on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). The Draft Guidelines define how the State of California intends to implement the California Clean Energy Jobs Act (Proposition 39) Program. We appreciate the hard work that staff has put into developing the Draft Guidelines. Unfortunately, the Draft Guidelines currently neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."¹

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Thank you for your consideration of our comments.

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016-502-2394

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October 25, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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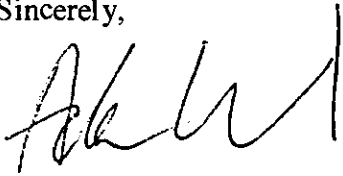
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Downhill Racer 222@hotmail.com

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October 25, 2013

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Submitted by E-mail to: docket@energy.ca.gov
Docket Number 13-CCEJA-1

RE: Docket Number 13-CCEJA-1 – Comments on Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines - Failure to Incorporated Proposition 39 Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions In Public School

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Targeted retrofits can help solve this problem. In particular, improvements in heating, ventilation and cooling systems and lighting systems, which together account for more than two-thirds of all school-related energy expenditures, can directly improve student and teacher performance and health.⁷ However, these retrofits will only have this ancillary benefit in performance and health if indoor environmental conditions are addressed as part of the retrofit.

Energy efficiency upgrades to heating and cooling systems will not adequately address ventilation issues, and in some cases could exacerbate existing problems, unless indoor air quality is evaluated and addressed at the same time. Similarly, installing more efficient advanced lighting control systems in schools will provide no benefit to students and teachers unless inadequate lighting conditions are addressed at the same time. Energy efficiency upgrades must also be assessed to ensure that they improve, rather than degrade, noise issues in classrooms.

Proposition 39 recognizes this and thus expressly mandates that funding for energy efficiency upgrades in public schools also be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.⁸

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also be revised to more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage both overstates the benefits of energy efficiency measures that do not address poor indoor environmental conditions and understates the benefits of measures that directly address these conditions. In addition, this percentage is much lower than

⁵ California Department of Education, Sustainable Schools Improve Learning and the Environment, available at <http://www.sb39advancecalifornia.org/wp-content/uploads/2013/research-downloads/CDF-Sustainable-Schools.pdf>.

⁶ Gordon & Barba, Proposition 39 White Paper: Investing in California's Future at p. 11, http://thenextgeneration.org/files/Prop39_Investing_In_California.pdf.

⁷ Ibid.


⁸ U.S. Environmental Protection Agency, Energy Efficiency Programs in K-12 Schools: A Guide to Developing and Implementing Greenhouse Gas Reduction Programs (2011), available at <http://www.sb39advancecalifornia.org/wp-content/uploads/2013/research-downloads/EPA-Energy-Efficiency-Programs-in-K-12-Schools.pdf>.

the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K-12 Project Guidance.⁹

We strongly recommend that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Wolf".

Email:

MWOLF 925@HOFMAIL.COM.

⁹ California Department of Education, California Energy Commission and the California Public Utilities Commission, *Proposition 39: Clean Energy Jobs Act of 2012 Energy Efficiency K-12 Project Guidance* (May 14, 2013) at p. 25.