

## DOCKETED

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## **CA should improve energy goals: include children's environmental health**

I am writing to urge that the proposed energy standards be withdrawn and amended to address children's need for healthful indoor air/environmental quality in their schools. CAL like all other states requires its children to attend school. CAL has over 6.5M children in over 6,500 public and charter k-12 schools; 60% of children enrolled are of African American or Hispanic heritage, two sub-populations especially vulnerable to asthma. Asthma among CAL children 5-17 (school age) is currently 20-40% higher than among adults. CAL does not have a system to identify school facility conditions or needs, a lapse that leaves school facility investment decisions to local board members who typically have no training in facility management, or in the hands of energy contractors and or utilities who have narrowly focused goals that do not include occupant environmental health.

EPA and HUD have both recognized that poorly conceived and executed energy retrofits can severely compromise the IAQ/IEQ of buildings: homes, housing and congregate settings like schools and child care facilities. Schools and child care facilities are the places where children spent most of their waking time when not at home.

Yet, I could not find in the new proposed regulations and background documents any references to CURRENT peer-reviewed published literature on the effects of unhealthy indoor environments in schools on children's health, thinking and learning. Further, it appears that there is no proposed regulatory requirement when doing energy retrofits on these large scale, taxpayer supported community facilities that the cost-benefits, inclusive of attendance and test scores, of various energy retrofits recognize and be tailored to the needs of children.

Not all energy efficient/net zero designs produce occupant health benefits, which CAL children and CAL schools need. Therefore it is doubly disappointing that the proposed regulations also do not cite and embed US EPA guidance on "Energy Savings + Health" for schools that provides technical information on what to consider when retrofitting an educational facility.

### **RECOMMENDATIONS-**

- 1- Update citations (IOM 2011, Climate, the Indoor Env, and Health; EPA Energy Savings + Health for schools; Schools for Health, 2017, Harvard Chan SPH; NRC, 2006, Green Schools)
- 2- Improve proposed regulations regarding school and child care facility retrofits, so that energy retrofits help maximize children's health, thinking and learning.
- 3- Repost updates for public comment.
- 4- Recommend establishing a broad-based school facility assessment data base in conjunction with CAL Dept. of Education.