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CAL SMACNA -- General Comments

Additional submitted attachment is included below.

February 5, 2021

Docket No. 20-RENEW-01
California Energy Commission
Dockets Office MS-4 1516
Ninth Street Sacramento, CA 95814-5512

RE: Comments on Draft Guidelines for Implementation of AB 841 and the School Reopening Ventilation and Energy Efficiency Verification and Repair Program as Presented by CEC Staff at January 22, 2021 Workshop

Chris Walker
Executive Vice President

2020-2021 OFFICERS
Duane Davies
President

Hector Vargas
President-Elect

Mitch Hoppe
Treasurer

Rick Reinholz
Secretary

Wyatt Jones
Immediate Past President

Dear Commissioners and Staff:

I write on behalf of the members of the California Association of Sheet Metal and Air Conditioning Contractors National Association (CAL SMACNA) to provide general comment on the Draft Guidelines for the School Reopening Ventilation and Energy Efficiency Verification and Repair Program ("SRVEVR Program") as presented at the January 22, 2021 Staff Workshop.

CAL SMACNA is a non-profit statewide trade association representing over 300 sheet metal and air conditioning contractors who employ more than 25,000 union employees and administrative personnel throughout the state of California. These contractors design, build and perform work in commercial and residential heating, ventilating and air conditioning (HVAC), testing and balance of HVAC systems, indoor air quality improvement and energy efficiency HVAC upgrades. Their range of work includes local, state and federal public works projects, as well as, private commercial and residential projects.

In 2020, CAL SMACNA actively supported the passage of AB 841. As public works contractors, we spend a good deal of time in public schools and are painfully aware of the poor condition of HVAC ventilation systems serving our students and teachers across the state. The lack of local resources is often the reason for the neglect of HVAC systems. Unfortunately, poor ventilation has proven to negatively impact comfort, performance and overall health of building occupants. Thankfully, Governor Newsom signed this bill into law and the California Energy Commission staff is now working expeditiously to speed these limited but important resources to local schools.

ASSOCIATE WITH COMMENTS OF NEMI AND JCEEP

In the interest of avoiding redundancy, CAL SMACNA fully supports and would like to associate itself with the comprehensive comments already provided to you by the National Energy Management Institute (NEMI) and the Joint Committee on Energy and Environmental Policy (JCEEP).

LONG-TERM PRIORITY TO ESTABLISH PROPER VENTILATION SYSTEMS IN ALL CLASSROOMS

The SRVEVR program under AB 841 does not and cannot stand on its own. In fact, it should be viewed in a greater context as the foundational step of a much of larger effort.

Research published in 2019 by Lawrence Berkeley Labs and UC Davis revealed that poor ventilation in the classroom is likely ubiquitous and indeed harming the health and cognitive performance of our students. They also found that improper HVAC system installation, operation and maintenance were the primary culprits. Since that time, the world has experienced a global pandemic of the COVID-19 virus. The CDC and the WHO are now recommending public health strategies including proper ventilation of indoor spaces to reduce the spread of COVID-19 as well as other pathogens and disease.

Given the established importance of ventilation on all these fronts, CAL SMACNA strongly believes a statewide goal should be to ensure 100% of all classrooms in California are properly ventilated and monitored by carbon dioxide sensors to maintain healthy levels of fresh air. We also know it will take a skilled and trained workforce of HVAC technicians and potentially billions of dollars over a multitude of years to meet this goal.

The resources provided by AB 841 are generous and a good start. But, as you may already know, the amounts to be provided over the next three years will prove to be insufficient in fully addressing, repairing or replacing failing school ventilation systems. AB 841 will achieve important improvements but much of the needed work will be left incomplete and contingent upon the arrival of future dollars. These additional resources could come from the federal government, a future statewide school facilities bond or local investment.

For these reasons, we believe the larger value of the SRVEVR program is to collect, establish and make available an accurate statewide assessment of classroom ventilation needs. This information is critical to help focus school facility investment now and into the future. The State of California needs the benefit of a centralized database for these purposes — and none exists today. We are hopeful that the state shares this goal and is able to achieve through SRVEVR this needed database.

Thank you for the opportunity to provide comment. CAL SMACNA looks forward to working collaboratively with the CEC staff and other stakeholders to implement the SRVEVR program to help us successfully achieve proper ventilation in each and every classroom in California. Please do not hesitate to contact me at (916) 363-7460 or chris@cal-smacna.org if you should have questions or need additional information.

In sincere appreciation,



Chris Walker
Executive Director, CAL SMACNA