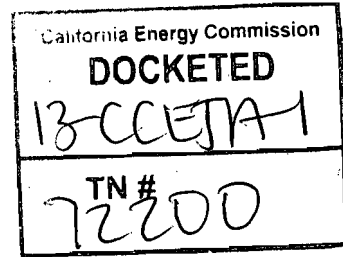


Energy - Docket Optical System

From: Chuck Mills [cmills@californiareleaf.org]
Sent: Friday, October 25, 2013 11:41 AM
To: Energy - Docket Optical System
Subject: Comments on Proposition 39
Attachments: Prop 39 Comments.pdf



Categories: Ready to Docket

Docket Number 13-CCEJA-1

On behalf of California ReLeaf and our Network of nearly 90 non-profit organizations delivering on-the-ground energy conservation in California communities through urban forestry, we are writing to applaud your inclusion of tree plantings as an eligible energy efficiency upgrade through Proposition 39 project implementation.

The cooling power of California's 200 million existing urban trees lowers our energy consumption by about 7,300 GWh each year, which is equivalent to more than seven 100 megawatt power plants. They reduce GHG emissions by about 6.3 million metric tons per year, with 1.8 million metric tons of that coming from emissions avoidance via energy conservation. The Draft Guidelines recognize this value of trees in the energy conservation and urban heat island mitigation.

For this reason, we encourage some additional focus within the guidelines on how trees can more fully integrate into Proposition 39, and the importance of non-profit partnerships in achieving sound, strategic implementation, as follows:

1. The guidelines should specify that non-profit organizations are eligible partners with LEA's in meeting energy efficiency upgrade objectives. Senate Bill 39 (DeLeon), which was the foundation for what eventually was set into statute through Senate Bill 73, clearly articulated the need to ensure schools and school districts have the flexibility to engage the best and most effective partners in implementing the suite of energy efficiency upgrades that will come online in 2014 and beyond. Specifically, SB 39 amendments dated May 28th, 2013 encouraged schools "to partner with two or more entities, including, but not limited to, other school districts, nonprofit organizations, local government agencies, ESCOs, and others." Just as the Draft Guidelines recognize that LEA's may need to hire an energy manager to fill potential voids in staff expertise, non-profit urban forestry groups can play a similar role in helping design and implement cost-effective and successful energy efficiency upgrades such as large-canopy tree plantings.
2. Clarify that trees and tree plantings are an effective water-efficiency measure. Mature trees can play a critical role in stormwater management, groundwater recharge, flood control, and water-related energy conservation. Though this is implied in Exhibit A under Water-Efficiency Measures, specific language included here should be amended to specify that LEA's can "plant native, drought-tolerant trees, plants and landscaping."
3. Expand tree planting opportunities beyond the "south side of buildings." Depending on the layout of a school, or its location, plantings in other may also achieve the desired energy-efficiency upgrade results. As an example, modeling performed in Sacramento and field data compiled by the USDA Forest Service's Pacific Southwest Research Station determined "trees shading a west exposure from afternoon sun had the greatest impact on cooling savings for all climate zones and insulation levels," and that "a single tree should be located to provide maximum shade to west or southwest exteriors." [Simpson, James R, McPherson, Gregory E; "Potential of Tree Shade for Reducing Residential Energy Use in California"; Journal of Arboriculture, 1996]
4. Expand scope of non-energy benefits factored into the proposed 3% adder. We applaud the CEC for taking a proactive position in factoring project co-benefits into competing project considerations. As California advances towards integrated strategies to achieve desired outcomes in GHG reductions, water conservation and energy efficiency, the co-benefits associated with eligible projects such as urban forestry must be considered in order to fully evaluate the

effectiveness of such projects. Additional non-energy benefits that should be considered and adopted in the final Guidelines include improved outdoor air quality, GHG reductions, and the learning environment.

We look forward to seeing LEAs proposing tree plantings as part of their overall energy-efficiency upgrade portfolio, and appreciate the opportunity to provide comment on the Draft Guidelines.

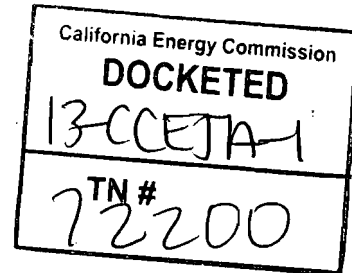
Sincerely,

Chuck Mills
Program Manager
California ReLeaf
2112 Tenth Street
Sacramento, CA 95818
(916) 497-0035



October 25, 2013

Ms. Marcia Smith
Manager
California Energy Commission
Fuels and Transportation Division
Special Projects Office
1516 Ninth Street
Sacramento, CA 95814-5504



RE: Docket Number 13-CCEJA-1 -- COMMENTS ON PROPOSITION 39

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Sincerely,



Joe Liszewski
Executive Director