California Energy Commission
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ALAMEDA COUNTY OFFICE OF EDUCATION
SHEILA JORDAN, SUPERINTENDENT
313 WEST WINTON AVE. • HAYWARD, CA 94544-1136
www.acoe.org

October 22, 2013

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Prop39@energy.ca.gov

Dear Sir/Madam:

RE: Comments on the Prop 39: CA Clean Energy Jobs Act -2013 Program Implementation Draft Guidelines

We wish to make the following comments about Chapter 3 (Additional Proposition 39 State Resources), Section 2 (California Workforce Investment Board Grant Program):

1. In addition to creating "…career pathways that are driven by public and private investment in energy efficiency and green building standards" (CA Energy Commission, 2013) local educational agencies (LEA) are interested in **creating "education pathways" to support future energy efficiency and green knowledge workers**.
2. Currently, Alameda County Office of Education's (ACOE) Leadership in Energy Efficiency Program (LEEP) provides high school and community college internships for students at California Partnership Academies[1] with a "green focus" (e.g., environmental science, sustainable urban design, renewable energy, engineering, architecture, and green) and community colleges (e.g., Ohlone's Engineering Dept. and Laney's Environmental Control Technology Dept.). Our goals are to encourage students to become science, technology, engineering, or mathematics (STEM) majors in high school, community colleges, and/or four-year colleges, and/or to obtain jobs in energy-related fields.
3. Your key program elements require "Pre-apprenticeship training aligned with local build trades councils and based on nationally certified Multi-Craft Core Curriculum" (CA Energy Commission, 2013). This presumes that your career pathways are only to building trades and precludes other green-related careers such as jobs from energy renewables; goods and services that improve energy efficiency; pollution reduction and removal; natural resource conservation; and environmental compliance, education, training, and public awareness (Clayton, Fairman, Haughton, & Viegas, 2011). **ACOE and LEAs wish to engage and**

[1] By law, 50 percent of the students must be academically at risk. These academies have a larger percentage of Latino and African American students than California's statewide population of high school students (CA Dept. of Education, Dayton, Hester, & Stern, 2011).

prepare students for a wider array of jobs that require varying levels of education and internships. ACOE and LEAs support education and career ladders to a rich and diverse level of green jobs.

4. In the California Workforce Investment Board's (CWIB) *Program Framework and Outcomes for Proposition 39 Training Funds,* they list performance targets/goals as "including completion of the Multi-Craft Core Curriculum Training and achievement of its certificate, placement in apprenticeship, placement in further education, ***and/or*** placement in employment" (emphasis added by author) (CA Workforce Investment Board, 2013). **Does the "and/or" in the above citation allow grant applicants to train students outside the Multi-Craft Core Curriculum? ACOE and LEAs support the broader interpretation.**
5. As part of the state-wide adoption of the Common Core Standards, including Next Generation Science Standards, high school students are expected to "Design, evaluate, and/or refine a solution to a complex real-world problem [i.e., energy inefficiency at school sites], based on scientific knowledge [e.g., ASHRAE level II energy audits], student-generated sources of evidence [e.g., use of measurement tools to confirm audits, student-collected data as part of the audits], prioritized criteria [e.g., NPV and SIR calculations, energy intensity], and tradeoff considerations [e.g., energy priorities of all school district facilities]" (Achieve Inc., 2013) [examples added by author]. **ACOE and LEAs support the inclusion of high school internships to enhance the learning opportunities in Next Generation Science Standards.**

We hope the California Energy Commission, the California Workforce Investment Board, and the Superintendent of Public Instruction will favorably consider our recommendations to change/modify the California Workforce Investment Board Grant Program. If you have any questions, you may reach me at (510) 670-4237 or ytom@acoe.org. Thank you for your time and consideration.

Sincerely,

Yvonne Tom, Ph.D.
Program Manager, Energy Efficiency
Leadership in Energy Efficiency Program
www.leepprogram.org

Cc: S. Jordan, Superintendent
A. Masri, Director of Facilities and Operations

Endnotes

Achieve Inc. (2013). High School Energy. In Achieve Inc. (Ed.), (pp. 2): Achieve Inc.,.

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CA Energy Commission. (2013). *Proposition 39: California Clean Energy Jobs Act - 2013 Program Implementation Draft Guidelines*. (CEC-400-2013-010-D-REV2). Sacramento, CA: CA Energy Commission Retrieved from www.energy.ca.gov/2013publications/CEC-400-2013-010/CEC-400-2013-010-D-REV2.pdf

CA Workforce Investment Board. (2013, Sept. 17). *California Workforce Investment Board Green Collar Jobs Council Meeting Notice September 17, 2013.* Paper presented at the Green Collar Jobs Council, Oakland, CA.

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A:Prop39workforcegrant.doc