CHAPTER FIVE GREEN OPERATIONS



Chapter 5: GREEN OPERATIONS – OVERVIEW

CDCR has been a major force within State government in accomplishing the objectives set forth in EO B-18-12 for State buildings, including energy efficiency projects and GHGe reduction efforts such as using clean on-site power generation, solar photovoltaic, and wind power generation. Through third-party Solar Power Purchase Agreements (SPPA), CDCR has completed 16 on-site renewable solar generation projects at 12 institutions totaling 33.6 megawatts (MW) and two wind turbines projects at two institutions totaling 3.64 MW.

74,385,296 kWh/yr. CURRENTLY GENERATED BY RENEWABLE POWER

173,305,424 kWh/yr. solar and wind power projected by 2022

CDCR has five additional solar and wind turbine projects in construction in 2019 totaling 18.09 MW.

There are planned solar projects in design, which will provide an additional 63.55 MW of solar energy. CDCR's statewide renewable energy portfolio is positioned to exceed 118 MW by the end of 2020.

CDCR has managed the design and construction of 61 new buildings that have achieved U.S. Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certification of a Silver level or higher. In addition, CDCR occupies eight LEED-certified leased buildings. CDCR has identified an additional nine projects that will be designed to meet or exceed the LEED Silver certification standards. There are also over 150 Health Care Facility Improvement Program (HCFIP) sub-projects currently being constructed that are designed to meet CALGREEN standards. Finally, CDCR has identified several potential ZNE building projects that are currently in design or are in the certification process.

CDCR's emphasis on "building green" has also carried through into its operations. The Department has established a number of green practices throughout its facilities. Examples include:

- Improved waste diversion and enhanced waste reduction and recycling,
- Maintenance methods aimed at improving indoor air quality such as enhanced filtration,
- Establishing less-toxic methods to control pests though integrated pest management practices, and
- Utilizing environmentally preferred purchasing methods for typical purchases such as office supplies and cleaning products to ensure goods and services meet stringent standards,
- Menu changes to offer more plant-based alternatives and reductions in the purchasing of red meat products.

Planned installations of electric vehicle charging stations will enable staff to use emission-free vehicles in their daily commutes and when combined with on-site renewable generation, will help to improve air quality.

These programs and partnerships, along with CDCR efforts overall have led to an 11 percent decrease in grid-based energy purchases and a 24 percent decrease in the overall Energy Usage Index (EUI) rate since 2003, despite a 17 percent increase in total institutional square footage. From August 2014 through December 2017, CDCR has diverted approximately 23,000 tons or organic waste from landfills in accordance with Assembly Bill 1826. CDCR has exceeded the 10 percent entity-wide GHGe reduction goal and is on track to meet the goal of a 20 percent reduction by 2020.

Through the continued efforts of CDCR's programs, projects, and objectives, the Department is on track to meet or exceed the overall GHGe, energy, and renewables goals and objectives set forth by the Administration and its own ambitious sustainability agenda, including being a leader in advancing and meeting the goals and objectives of EOs B-18-12 and B-16-12.

Greenhouse Gas (GHG) Emissions

State agencies are directed to take actions to reduce entity-wide GHGe by at least 10 percent by 2015 and 20 percent by 2020, as measured against a 2010 baseline.

GREENHOUSE GAS EMISSIONSReduced by 23% since 2010

CDCR is on track to meet the 20 percent goal by 2020 based upon the 2010 baseline.

However, CDCR had previously set a 2007 baseline and based upon that has already exceeded the 20 percent goal by almost 10 percent despite a 17 percent increase in total institutional square footage. CDCR will continue to strive for further reductions and plans to achieve them through the efforts described below.

Energy Efficiency

CDCR has engaged in a collaborative effort through the California Investor-Owned Utilities (IOU)/CDCR Energy Efficiency Partnership Program to improve energy efficiency since 2008. As of 2018, CDCR has completed 108 energy efficiency projects in existing buildings and new construction that have yielded a combined GHGe reduction of 69,891 metric tons per year and an annual cost savings of \$8,682,324.

CDCR will continue to utilize energy efficiency projects to reduce GHGe. From the time period of 2019 through 2022, CDCR has a total of 51 energy efficiency and savings by design projects that are either in development or included in future projections. These projects are expected to provide annual cost savings of \$884,368 and additional GHGe reductions of over 6,538 metric tons per year.

Figure 24- Solar Arrays - SAC



On-Site Renewable Energy

Through third-party Solar Power Purchase Agreements (SPPA), CDCR has completed 17 on-site renewable solar generation projects at 14 institutions totaling 34.92 megawatts (MW) and three wind turbines at three institutions totaling 3.6 MW as of December 2019.

Several solar projects totaling 17 MW are in construction and scheduled to be complete in early 2020. Additional solar projects have been awarded and are in the design phase and are planned for construction during 2020-2022. These projects are estimated to bring an additional 61.55 MW into CDCR's renewable energy portfolio.

CDCR will continue to utilize renewable energy projects where feasible to reduce GHGe. CDCR's statewide renewable energy portfolio is positioned to exceed 118 MW by the end of 2022 as shown in **Table 39**.

Table 39- CDCR Renewable Energy Portfolio

Institution	Completed Solar (MW)	Completed Wind Turbines (MW)	Solar In Constructio n (MW)	Wind Turbine in Construction (MW)	Solar In Design (MW)
ASP	TBD	N/A	TBD	N/A	8.00
CAL	TBD	N/A	6.00	N/A	2.00
CCI	2.33	N/A	TBD	N/A	4.00
CCWF	2.50	N/A	2.00	N/A	N/A
CEN	TBD	N/A	6.00	N/A	2.00
CIM	TBD	N/A	TBD	N/A	5.00
CIW	TBD	N/A	1.00	N/A	N/A
CMC	TBD	N/A	TBD	N/A	4.00
COR	5.00	N/A	N/A	N/A	N/A
CTC	TBD	N/A	TBD	N/A	1.00
CTF	1.00	1.79	TBD	N/A	2.00
CVSP	4.94	N/A	TBD	N/A	3.00
FSP/SAC	1.30	N/A	N/A	N/A	N/A
ISP	5.00	N/A	TBD	N/A	2.00
KVSP	TBD	N/A	TBD	N/A	3.00
LAC	2.00	1.85	TBD	N/A	2.40
MCSP	TBD	N/A	TBD	N/A	2.00
NCYCC	TBD	N/A	TBD	N/A	3.00
NKSP	5.00	N/A	N/A	N/A	N/A

Institution	Completed Solar (MW)	Completed Wind Turbines (MW)	Solar In Construction (MW)	Wind Turbine in Construction (MW)	Solar In Design (MW)
PVSP	1.22	N/A	TBD	N/A	2.00
RJD	TBD	N/A	TBD	N/A	6.00
SOL	1.13	N/A	TBD	N/A	3.00
SVSP	2.00	1.79	TBD	N/A	3.50
VCYF	TBD	N/A	TBD	N/A	1.50
VSP	TBD	N/A	TBD	N/A	2.15
WSP	1.50	N/A	2.00	N/A	N/A
Totals	33.63	3.64	16.30	1.79	63.55
Grand Total	118.91				

Purchased Renewable Energy

To date, CDCR has relied on the use of renewable energy produced on-site due to its substantial landholdings but is considering purchasing renewable energy from other providers (Sacramento Municipal Utility District and Marin Clean Energy) for institutions where land constraints are present to increase its total energy delivered through renewable resources. CDCR is participating in three Community Choice Aggregate programs; San Quentin is enrolled in Marin Clean Energy's Light Green program receiving 50 percent renewable energy, SVSP and CTF are enrolled in Monterey Bay (MB) Community Power's MB Choice program receiving 100 percent renewable energy and LAC is enrolled in Lancaster Choice Energy receiving 38 percent renewable energy. CDCR also has the following facilities served by the Western Area Power Administration (WAPA) that transmits hydroelectric power: CMF, DVI, FSP, OHCYCF, NCYCC, CHCF and SCC. WAPA sells power from 57 hydropower power-plants operated by the Bureau of Reclamation, the U.S. Army Corps of Engineers and the international Boundary and Water Commission.

Fuel Efficient Vehicles and Zero Emission Vehicles

CDCR's light-duty fleet has increased the number of fuel-efficient vehicles over the last several years. CDCR has 682 traditional hybrid vehicles, 47 plug-in hybrids vehicles and eight battery electric vehicles (BEV) as shown on the State of California Green Fleet website. The ESS seeks out utility companies' grant programs and other funding sources to install electric vehicle charging infrastructure and charging station equipment and has already installed charging stations at several prisons with more planned over the next several years.

In addition to the State-owned fleet, CDCR encourages its employees to utilize ZEV's through the installation of electric vehicle charging stations at state-owned and leased facilities and by providing information on state discounts for the purchase or lease of ZEV's through DGS.

Looking forward, fuel-efficient vehicle purchases will continue to increase per the Department's Fleet Acquisition Plan, and opportunities to support other non-fleet vehicles with charging needs will continue to be explored and implemented as the need increases and/or resources permit.

Biofuels

CDCR operates a number of vehicles, equipment, and buildings systems that rely on diesel fuel. The Department has recently increased its renewable diesel and other biofuel purchases where feasible and will continue to explore additional opportunities to increase the Department's usage. For example, in 2018, CDCR purchased over 506,000 gallons of renewable diesel this is an increase of almost 50% from the previous year.

All of the above efforts in combination and others discussed in this report have led to substantial reductions in the Department's carbon footprint. **Table 40** and **Figure 25** below show the GHGe reductions that CDCR has realized since 2007.

Table 40- GHG Emissions Since 2007

	Natural Gas	Vehicles	Purchased Electricity	Total
2007 Baseline	235,247	36,122	237,127	508,460
2010 Baseline	242,165	22,414	175,570	440,150
2011	236,345	61,861	211,632	509,839
2012	215,931	55,144	169,331	440,405
2013	210,379	25,424	171,434	407,237
2014	207,314	22,582	155,553	385,449
2015	192,601	20,222	136,501	349,324
2016	202,194	17,381	136,289	356,584
2017	189,337	15,483	118,310	323,130
2018	196,821	23,107	117,577	337,505
Percent Change since 2007 Baseline	84%	64%	50%	66%
Percent Change since 2010 Baseline	81%	103%	67%	77%

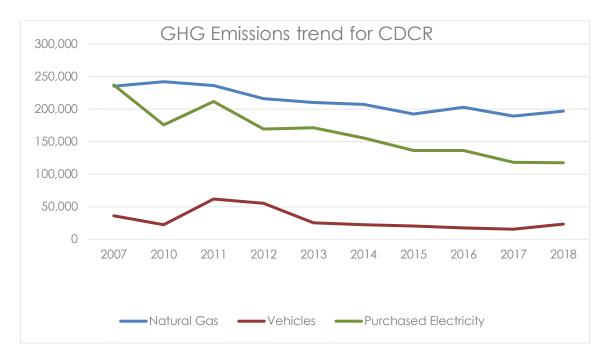


Figure 25- GHG Emissions Trend for CDCR

Building Design and Construction

EO B-18-12 requires that all new buildings, major renovation projects and build-to-suit leases over 10,000 square feet shall obtain LEED Silver certification or higher. All new buildings fewer than 10,000 square feet shall meet applicable CALGREEN Tier 1 Measures. New buildings and major renovations greater than 5,000 square feet are also required to be commissioned after construction.

Since July 1, 2012, CDCR has 14 LEED BD+C certified new construction projects involving 59 buildings (totaling 10 Gold and 49 Silver certifications). Additionally, since July 1, 2012, CDCR has leased another building with a LEED ID+C Silver certification awarded in 2015.

All new buildings and renovations built since July 1, 2012 and the associated LEED level achieved, along with post-construction commissioning (Cx) completed or planned, are listed in **Table 41** below.

Table 41- New Construction Since July 1, 2012

Project Name	LEED Level Achieved	Commissioning Performed (Y/N)
CIW - 45-Bed Mental Health Crisis Facility	1 Building, LEED BD+C Silver, 2013	Υ
SAC - Enhanced Outpatient Program	1 Building, LEED ID+C Silver, 2013	Y
CMF - 64-Bed Mental Health Crisis Facility	1 Building, LEED BD+C Silver, 2013	Υ
CMF - Enhanced Outpatient Program	1 Building, LEED BD+C Silver, 2013	Y
COR - ASU Enhanced Outpatient Program	1 Building, LEED BD+C Gold, 2014	Y
LAC - ASU Enhanced Outpatient Program	1 Building, LEED BD+C Gold, 2014	Y
CMC - 50-Bed Mental Health Crisis Facility	1 Building, LEED BD+C Gold, 2014	Υ
SAC - Psychiatric Services Unit	1 Building, LEED BD+C Gold, 2014	Υ
SVSP - Enhanced Outpatient Program	1 Building, LEED BD+C Gold, 2014	Υ
CHCF - Materials Service Center	1 Building, LEED BD+C Gold, 2014	Υ
CHCF - Central Utility Plant	1 Building, LEED BD+C Gold, 2014	Υ
CHCF - Various	31 Buildings, LEED BD+C Silver, 2014	Υ
DNCA - Enhanced Outpatient Program	1 Building, LEED BD+C Silver, 2015	Υ
DNCA - Material Unit Transfer	1 Building, LEED BD+C Silver, 2015	Υ
MCSP - Level II Dorm Complex	12 Buildings, LEED BD+C Silver, 2016; 2 Buildings, LEED BD+C Gold, 2016	Y
SAC - HCFIP (Sub-project 3)	1 Building, LEED BD+C Gold, 2018	Y
RJD - Level II Dorm Facility	In Progress, Goal of LEED BD+C Silver	Cx Planned
ISP - Central Chiller Plant	In Progress, Goal of LEED BD+C Silver	Cx Planned
CCC - HCFIP (Sub-project 4)	In Progress, Goal of LEED BD+C Silver	Cx Planned
CMC - HCFIP (Sub-project 4)	In Progress, Goal of LEED BD+C Silver	Cx Planned
CMC - HCFIP (Sub-project 6)	In Progress, Goal of LEED BD+C Silver	Cx Planned
FSP - HCFIP (Sub-project 3)	In Progress, Goal of LEED BD+C Silver	Cx Planned
SOL - HCFIP (Sub-project 1)	In Progress, Goal of LEED BD+C Silver	Cx Planned
CIM - 50-Bed Mental Health Crisis Facility	In Progress, Goal of LEED BD+C Silver	Cx Planned

Project Name	LEED Level Achieved	Commissioning Performed (Y/N)
RJD - 50-Bed Mental Health Crisis Facility	In Progress, Goal of LEED BD+C Silver	Cx Planned

State agencies, such as CDCR, are required to implement mandatory measures and relevant and feasible voluntary measures of the California Green Building Standards Code (CALGREEN), Part 11, related to indoor environmental quality (IEQ) that are in effect at the time of new construction or alteration and shall use adhesives, sealants, caulks, paints, coatings, and aerosol paints and coatings that meet the volatile organic chemical (VOC) content limits specified in CALGREEN.

CDCR supports the implementation of EO B-18-12, LEED, CALGREEN Tier 1, and commissioning requirements by ensuring those requirements are clearly laid out for new construction projects. The Department's standard Architect and Engineering Contract of Services includes language mandating the incorporation of Governor's EO B-18-12, including the Green Building Action Plan, and requiring compliance with CALGREEN Code. In addition, CDCR's Sustainable Design Guidelines (Design Criteria Guidelines Manual – Volume II – Appendix J) provides additional information outlining the requirements for LEED Silver or higher certification for new and major renovations >10,000 square feet (sf), commissioning for new construction and renovations >5,000 sf with an Energy Usage Index (EUI) of 50 kBTU/sf or larger, and for all new construction and renovations >10,000 sf.



Figure 26- California Health Care Facility

Several projects, currently in construction, have completed a Green Building Compliance Report during multiple design phases which details how each of the requirements of EO B-18-12, including the Green Building Action Plan, are proposed to be implemented. These reports include LEED requirements and a preliminary scorecard together with commissioning requirements for all buildings >5,000 sf. This report also includes a CALGREEN checklist which describes how projects need to comply with the mandatory requirements and which voluntary Tier 1 requirements are relevant and feasible together with the requirements for

documentation to be provided by the contractor to demonstrate compliance at the end of the project.

CDCR provides design consultants with Standard Design Document (SDD) specification sections that are available for use on a project. The SDD specifications already include the requirements for LEED submittals and certification as part of Section 01 81 13 SUSTAINABLE DESIGN REQUIREMENTS. CDCR's standard sustainable design specification has been edited to include the general requirements and procedures for compliance with LEED on certain projects. This specification requires the maintaining of a comprehensive LEED file electronically with verification documentation for each LEED measure. In addition, modifications to Sections 01 74 19 CONSTRUCTION WASTE MANAGEMENT AND DISPOSAL and 01 81 22 INDOOR AIR QUALITY PROTECTION BEFORE OCCUPANCY were updated to include CALGREEN requirements. CDCR also has two specification sections that address recycled content, which require the contractor to track and report recycled-content products for procured materials and submit Waste Reduction Reports.

LEED for Existing Buildings Operations and Maintenance (LEED O+M)

All state buildings over 50,000 square feet were required to complete LEED O+M certification by December 31, 2015, and meet an Energy Star rating of 75 to the maximum extent cost effective.

CDCR staff has identified 23 buildings over 50,000 sf that will require LEED O+M certification. However, there are multiple challenges in achieving this goal:

- The United States Department of Energy, which established the Energy Star program, does not have established energy star criteria for correctional facilities. Without this, CDCR cannot achieve any energy star rating and hence a LEED O+M designation. This requires a change at the federal level, which CDCR intends to pursue along with other state correctional agencies. In 2019, CDCR completed an Energy and Water Survey developed by the Association of State Correctional Administrators (ASCA), American Correctional Association's Sustainability Committee, GreenPrisons.org, the United States Department of Energy and the Lawrence Berkeley National Laboratory. The ASCA survey results help CDCR to identify opportunities to reduce energy and water usage and associated costs, as well as the development of a correctional facility type in the Energy Star Portfolio Manager system, which is a step towards prisons receiving an Energy Star score and meeting requirements to pursue LEED O+M.
- USGBC LEED O+M Minimum Energy Performance Prerequisite requires that each building's energy use must be metered for a full 12 months of continuous operation. CDCR institutions commonly have only one utility meter for the entire institution so building sub-meters must first be installed.

- The cost of installing these sub-meters must be planned over multiple fiscal years.
- CDCR also utilizes high-security protocols for information systems that must be coordinated with any data transmissions from the new sub-meters.

However, despite these challenges, CDCR is working closely with an Energy Service Company, institution staff, and CDCR's Enterprise Information Services staff and has begun the process of installing sub-meters at select buildings with others planned in the future.

Table 42- LEED for Existing Buildings and Operations

Number of Buildings over 50,000 sf and eligible for LEED O+M	23
Number of Building over 50,000 sf that have achieved LEED O+M	3 in process
Percentage of buildings over 50,000 sf required to achieve LEED O+M that have achieved it	0

Moving forward, CDCR will continue to install building sub-meters at the remaining 20 LEED O+M eligible buildings based upon funding availability. Additionally, CDCR includes the installation of building sub-meters in the design of all new construction and rehabilitation projects, which will facilitate future LEED O+M certification.

Indoor Environmental Quality (IEQ)

When accomplishing Alterations, Modifications, and Maintenance Repairs, and when relevant and feasible, State agencies shall implement the mandatory and voluntary measures of the California Green Building Standards Code (CALGREEN), Part 11, related to indoor environmental quality. Indoor Environmental Quality must also be maintained by using low-emitting furnishings, cleaning products and cleaning procedures.

Incorporating Indoor Environmental Quality (IEQ) Provisions of CALGREEN Tier 1 CDCR's sustainable guidelines help designers understand the project requirements in relation to sustainability. CDCR's sustainable guidelines state that all relevant and feasible voluntary measures from Divisions A4.5 and A5.5 of the California Green Buildings Standards Code should be implemented.

Voluntary measures for Tier 1 for EQ CALGREEN include increased testing of indoor air quality, more stringent formaldehyde requirements, VOC limits and verification for acoustical ceilings and wall panels, use of entryway systems and isolation of pollutant sources, increased air filtration (MERV 11), additional lighting and thermal comfort controls, increased consideration for additional daylight and view requirements, no hydrochlorofluorocarbons (HCFCs), and requirements for hydrofluorocarbons (HFCs). Mandatory Tier 1 measures include additional

requirements for resilient flooring and thermal information together with verification of code compliance.

As discussed previously, some projects currently in construction have completed a Green Building Compliance Report during the Schematic Design Phase.

Figure 27- IEQ Monitoring During
Construction - PVSP



Specific updates made to Sections 01 81 13 SUSTAINABLE DESIGN REQUIREMENTS and 01 81 22 INDOOR AIR QUALITY PROTECTION BEFORE OCCUPANCY also support the Environmental Quality (EQ) provisions of CALGREEN Tier 1 to include no additional formaldehyde, VOC limits and verification for acoustical ceilings and wall panels, thermal insulation improvements and verification and building flush-out. These were the CALGREEN Tier 1 measures identified for the program as being relevant and feasible.

Tier 1 measures that were identified as not feasible in a correctional environment included entryway systems, daylight, and views requirements. CDCR will continue to explore Tier 1 measures that can be incorporated in select buildings that are not correctional in nature and/or are outside of the secure perimeter in future projects.

New Construction and Renovation

To ensure healthy indoor environments for occupants, CDCR's Sustainable Design Guidelines (Design Criteria Guidelines Manual – Volume II – Appendix J) require



relevant and feasible voluntary measures from Divisions A4.5 and A5.5 of CALGREEN, which relate to Environmental Quality. As laid out above, steps have been taken to improve the process for ensuring voluntary measures related to IEQ are implemented in all building projects by including specific requirements which relate to IEQ in the specifications. These requirements include requiring submittals for product data indicating VOC content for adhesives and sealants applied inside the weatherproofing barrier, paints and coatings, and applied on-site. They also

include the requirements for VOC limits for adhesives, sealants, caulks, paints, coatings, flooring systems, thermal insulation, and acoustic panels.

CDCR also maximizes daylighting in new construction when feasible by providing a direct line of sight to the outdoors via windows, skylights, and clerestory glazing

in 90 percent of all regularly occupied areas, as well as using top-lighting, sidelighting, light shelves, reflective room surfaces, various means to eliminate glare, and photo sensor controls where feasible. This can be a challenge in correctional facilities, but design teams should ensure these methods are incorporated for all areas where possible.

Furnishings

Per MM 14-05, office furniture and seating are required to comply with either:

- DGS' Purchasing Standard and Specifications (Technical Environmental Bid Specification 1-09-71-52, Section 4.7) or
- The American Society of Heating, Refrigerating and Air-Conditioning Engineers' (ASHRAE) Standard 189.1-2011 (Section 8.4.2.5).

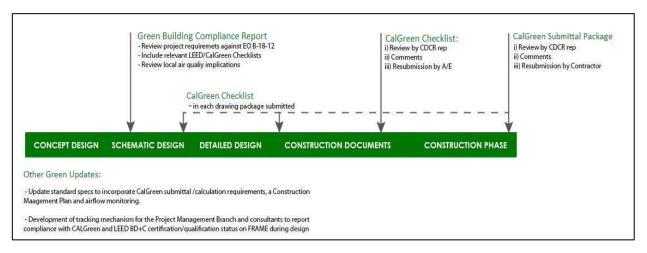
CALPIA manufacturing and associated products are compliant with DGS' Purchasing Standard and Specifications (Technical Environmental Bid Specification 1-09-71-52). CALPIA systems furniture has been third party certified to meet the most aggressive standards for volatile organic compound (VOC) emissions. We tested our products through SCS Global. Indoor Advantage Gold certification is SCS Global Services' highest level of indoor air quality performance for furniture. The certification assures that furniture products support a healthy indoor environment by meeting strict chemical emission limits for volatile organic compounds (VOCs). To be certified, products must be tested by independent labs for compliance with the ANSI/BIFMA X7.1, and either ANSI/BIFMA e.3 or CDPH/EHLB Standard Method V1-1 for VOC emissions of concerns.

DGS has a modular systems furniture specification (DGS 7110-3045 REV. 6 Engineering & Environmental Specification) which, under Section 5 Environmental specifications, establishes the requirements and specifications for implementation of Environmentally Preferable Purchasing (EPP) as mandated by the California Public Contract Code (PCC), Division 2, Part 2, Chapter 6, Sections 12400-12404, and required by EO B-18-12. For seating, the State has DGS Purchasing Standard 56112100 Seating, which in a similar manner sets out the Environmentally Preferable Purchasing Requirements in line with EO B-18-12.

CDCR has a tracking program for its Project Management Branch and consultants to report compliance with LEED BD+C certification/qualification status on their internal/consultant SharePoint website during design. This tracking process will help support the verification of compliance with LEED BD+C.

The chart **Figure 28** below illustrates CDCR's process to be implemented in 2020 to further institutionalize the use of the standards mentioned.

Figure 28- CDCR Process Flow



Cleaning Products

CDCR utilizes 'California Green' cleaning products manufactured by the California Prison Industry Authority (CALPIA). CALPIA products meet the Green SealTM standard. Per section 2807 of the California Penal Code, CDCR must order items provided by CALPIA unless an exemption has been approved.



Cleaning Procedures

CDCR employs inmates at its facilities to provide general cleaning. CDCR has also been using CALPIA and inmates under its employ at all Health Care facilities statewide through their Healthcare Facilities Maintenance (HFM) program. HFM provides reliable, comprehensive, and innovative cleaning services for California Correctional Health Care Services and meets all federal and

California healthcare environmental standards. The CALPIA team focuses on infection prevention and germ control by using a comprehensive program, which includes training and hands-on supervision. CALPIA uses quality specialized cleaning products, ensuring conformance to environmental services best practices and International Sanitary Supply Association (ISSA) guidelines.

HVAC Operation

During construction, CDCR requires that HVAC systems provide no less than the Minimum Outdoor Air Requirements and that buildings are purged with outdoor air sufficient for three complete air changes or the minimum ventilation rate allowed in Section 120.1(b)2 of Title 24 for 1 hour before occupancy of completed renovations or new construction.

Figure 29- IAQ Monitoring During Construction of CSP-SAC



This requirement for outdoor air monitoring will be added to SECTION 01 81 13 SUSTAINABLE DESIGN REQUIREMENTS to ensure this requirement is included on all projects per MM 14-05.

After construction and during normal operations, CDCR Plant Operations staff at each institution performs HVAC system maintenance and repair tasks per the schedules set in CDCR's Standard Automated Preventive Maintenance System (SAPMS), a computer-based system that tracks all institution maintenance and work orders. SAPMS details work activities required based typically on manufacturer's recommendations. These activities include:

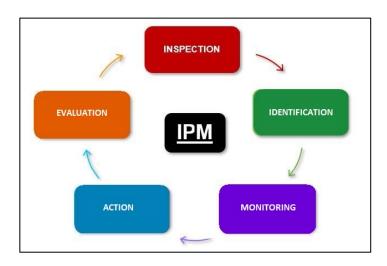
- Verification of minimum outdoor airflows using hand-held airflow measuring instruments.
- Confirmation that air filters are clean and replaced based on the manufacturer's specified interval.
- Air filters have a Minimum Efficiency Reporting Value (MERV) rating of no less than 11.
- Verification that all outdoor dampers, actuators and linkages operate properly.
- Checking condition of all accessible heat exchanger surfaces for fouling and microbial growth, with action taken if growth is found.
- Checking the first 20 feet of ductwork downstream of cooling coils for microbial growth, with action taken if growth is found.
- Ensuring that cooling towers are properly maintained and that records of chemical treatment are kept.
- FPCM reviews SAPMS required tasks to ensure that they are also consistent with the provisions of EO B-18-12 in 2018 and implement any required changes accordingly.

Integrated Pest Management (IPM)

Department staff and contracted pest management companies are now required to follow an integrated pest management (IPM) strategy that focuses on long-term prevention of pest problems through monitoring for presence, improving sanitation, and using physical barriers and/or other nonchemical

practices. If nonchemical practices are ineffective, <u>Tier 3 Pesticides</u> may be used, progressing to Tier 2 and then Tier 1 if necessary.

Figure 30- IPM Process Flow Chart



CDCR has long-term pest management strategies in place either through a statewide contract or at the individual institution level. The term IPM has not been specifically used by the Department but the strategies are the same, beginning with monitoring, improved sanitation, and installing physical barriers such as caulk before moving on to the use of chemicals. The existing pest control contracts listed in **Table 43** below expire on December 31, 2019, with the new contract beginning January 1, 2020 through December 31, 2022, which will include 34 institutions on Exhibit E of the bid advertisement, as well as juvenile facilities and camps. The contracts contain all of the strategies of an IPM and the term IPM will be added to the scope of work for any new contracts.

Table 43- Existing Pest Control Contracts

Pest Control Contractor	Institutions	IPM Specified (Y/N)
Orkin Pest Control	ASP, COR, SATF	Ν
Jabez Group, Inc. dba A Tovar Termite and Pest Control	CIM/CIW	N
Cartwright Termite and Pest Control	CAL, CCI, CEN, CTF, VYCF	Ν
Hunter Services	CHCF, DVI	N

Waste and Recycling Programs

The California Integrated Waste Management Act (Assembly Bill 939, Sher, Chapter 1095, Statutes of 1989 as amended) established the solid waste management hierarchy. Source reduction is at the top of the state's waste

management hierarchy; recycling and composting is next, followed last by environmentally safe disposal. California's Department of Resources Recycling and Recovery (CalRecycle) brings together the state's recycling and waste management programs. State agencies must report their waste and recycling efforts by May 1 of each year covering activities conducted during the prior calendar year.

Public Resources Code (PRC) Section 42926 requires each State agency and large State facility to submit an annual Waste Management (WM) Report to CalRecycle. Senate Bill 106, Chapter 343, Statutes of 2008 (Wiggins) implemented a simplified measure of jurisdictions' performance. SB 106 accomplished this by changing to a disposal based indicator — the per capita disposal rate, which uses only two factors; a jurisdictions' population and its disposal as reported by disposal facilities.

The goal for an agency's annual per capital disposal is to be less than the 0.4 disposal target. The annual per capita disposal, in comparison with the disposal target, is not the sole determination of compliance. It also evaluates agencies/facilities on the waste reduction, reuse, recycling, composting, and buy recycle programs.

CDCR's 2018 WM report for HQs' leased facilities utilizes the methodology created in 2016 by CalRecycle to determine a more accurate pounds per person. Based on this methodology, the 2018 annual per capita disposal for CDCR Headquarters leased facilities increased from .23 in 2017 to .38 in 2018 and exceeds the requirement. Headquarters leased facilities are exempt from reporting on organic recycling due to generating less than 4 cubic yards per week- CDCR is in compliance with the reporting requirements.

Pursuant to <u>SB 1106 Lowenthal</u>, et. al <u>Chapter 590</u>, <u>Statutes of 2006</u>) each state agency shall have at least one designated waste and recycle coordinator. The coordinator shall perform the duties imposed pursuant to this chapter using existing resources. The coordinator shall be responsible for implementing the integrated waste management plan and shall serve as a liaison to other state agencies and coordinators. CDCR has a designated SABRC Coordinator assigned at each institution that is responsible for meeting waste and recycling statutory reporting requirements. Based on recommendations from CalRecycle, CDCR is planning to develop an internal stakeholder task force to explore the benefits of developing department-wide operational standards, policies and a centralized headquarters function to comply with SAM Chapter 19, AB 75, AB 341, AB 1826 and SB 1383. This centralized function may also track CDCR's recycling efforts as a whole versus separate reports for each institution.

DIVERTED FROM LANDFILLS

28.3 thousand tons of food and organic waste between 2014-2018, enough to fill 3,773 dump trucks

Recycling

Recycling is the practice of collecting and diverting materials from the waste stream for remanufacturing into new products, such as recycled-content paper.

Stewardship programs help collect and recycle carpet, paint, and mattresses. AB 341 (Chesbro, Chapter 476, Statutes of 2011) requires businesses and public entities that generate four cubic yards or more of commercial solid waste per week to arrange for recycling services under the goal of source reducing, recycling or composting 75% of solid waste generated statewide.

Organics Recycling

State agencies must abide by AB1826 (Chesbro, Chapter 727, Statues of 2014) which requires that state agencies arrange for recycling services for the following types of organic material:

- Food waste
- Green waste
- Landscape and pruning waste
- Nonhazardous wood waste
- Food-soiled paper

This new law requires that each state agency recycle organic material on or by the following dates based on amount of materials generated:

- 8 or more cubic yards of organic material per week--April 1, 2016
- 4 or more cubic yards of organic material per week--January 1, 2017
- 4 or more cubic yards of solid waste per week--January 1, 2019
- 2 or more cubic yards of solid waste per week, if statewide disposal of organic waste is not decreased by half--January 1, 2020

Note: Solid waste means trash, recycling and organics. This is different than AB 341, which is trash only.

Organic waste accounts for more than one third of the 30 million tons of waste that are currently sent to landfills within the State of California. In order to achieve the mandates of AB 1826, CDCR is working with the California Department of Resources Recycling and Recovery to establish a comprehensive program aimed at diverting food and green waste from landfills. CDCR also executed a new master services contract in 2019 to provide food and green waste recycling services statewide. CDCR has experienced challenges in complying with this

mandate at some locations due to a lack of bidders. For LAC and CEN, there were four attempts to have a contractor bid on the contract to provide services, and all attempts failed to deliver any bidders. The next steps will be to find alternative recycling solutions for these institutions. In addition, RJD utilizes vermiculture to compost organic waste instead of diverting to the landfill. SVSP and CEN are in the process of developing vermiculture composting to divert their respective organic waste. CDCR is considering recommendations from CalRecycle to combine service contracts for trash, recycling and organic waste recycling to maximize waste diversion for each institution and p

Hazardous Waste Materials

The worksite "Fire Chief or other Hazardous Materials Specialist", per DOM 52030.5, "shall be contacted to provide for the proper disposal of hazardous and universal waste" [via a statewide master service agreement.] The actual process for the collection and disposal is defined by each worksite's Local Operating Procedures as well as Federal, State and Local regulations. The management of electronic waste, used tires, metals recycling and other non-hazardous waste is managed by the worksite Recycling and Salvage Program (RASP) as identified in the CDCR Financial Information Memo (FIM) #2014-03.

Material Exchange

CDCR institutions promote the exchange and reuse of unwanted or surplus materials to reduce the cost of materials/products and results in the conservation of energy, raw resources, landfill space, and the reduction of greenhouse gas emissions, purchasing costs, and disposal costs. Material exchange and/or donations includes:

- Nonprofit/school donations
- Internal property reutilizations
- State surplus (accepted by DGS)
- Used book exchange/buy backs
- Textiles
- Mattresses
- ASP donates blankets that do not meet the criteria for inmate use to animal shelters (Tulare and Porterville SPCA, as well as Avenal Dog Kennel). Toner cartridges are donated to Pioneer School District.

Waste Prevention/Reuse

The list below provides CDCR's common waste prevention and reuse activities. These solutions support (a) waste prevention: actions or choices that reduce waste and prevent the generation of waste in the first place; and (b) reuse: using

an object or material again, either for its original purpose or for a similar purpose, without significantly altering the physical form of the object or material.

- Paper forms reduction online forms
- Bulletin boards
- Remanufactured toner cartridges
- Washable/Reusable cups, service ware, towels
- Reusable boxes
- Reusable pallets
- Reusable slip sheets
- Electronic document storage
- Intranet
- Reuse of office furniture, equipment & supplies
- Reuse of packing materials
- Double-sided copies
- Email vs. paper memos
- Remanufactured equipment
- Rags made from waste cloth or reusable rags
- Other Textiles
- Mattresses

Training and Education

Pursuant to <u>AB 2812 (Gordon, Chapter 530, Statutes of 2016)</u>, each state agency is required to provide adequate receptacles, signage, education, and staffing, and arrange for recycling services consistent with existing recycling requirements for each office building of the state agency or large state facility. The bill requires, at least once per year, each covered state agency and large state facility to review the adequacy and condition of receptacles for recyclable material and of associated signage, education, and staffing. Additionally, the bill requires each state agency to include in its existing Report to CalRecycle a summary of the state agency's compliance with the act. CDCR institutions comply with AB 2812 by implementing the following:

- Dedicated Recycling Staff (Existing or implemented by July 1, 2018)
- Signage (signs, posters, labels for recycling bins. Existing or implemented by July 1, 2018

- Employee training (Existing or implemented by July 1, 2018)
- Web page (intranet or internet)
- Brochures, flyers, newsletters, publications, newspaper articles/ads
- Office recycling guide, fact sheets
- New employee package
- Outreach (internal/external) e.g. environmental fairs
- Seminars, workshops, special speakers
- Waste audits, waste evaluations/surveys
- Special recycling/reuse events

Foodservice Items

SB 1335 (Allen, Chapter 610, Statutes of 2018) requires food service facilities located in a state-owned facility, operating on or acting as a concessionaire on state-owned property, or under contract to provide food service to a state agency to dispense prepared food using food service packaging that are reusable, recyclable, or compostable. The new law requires CalRecycle to adopt regulations by January 1, 2021, to establish the process and criteria to determine what types of food service packaging are reusable, recyclable, or compostable. CalRecycle must also publish a list of food service packaging that meets these criteria within 90 days of the regulation going into effect. Food service facilities will only be allowed to purchase food service packaging from the approved list, which will be updated at least once every five years.

The types of foodservice operations at CDCR include:

Cook-Serve System

This is the traditional food service system. All food is cooked just prior to each meal. Few items are prepared one day ahead of service, such as pudding and gelatin. Typically, the meal is cooked to coordinate 30 minutes ahead of serving time, which is usually when the institutional count clears. This process is repeated throughout the day. Kitchens that utilize the cook-serve system, rarely cook food to place in inventory, because all food is consumed within hours of production.

Cook-Chill System

This is a departure from the traditional cook-serve method of institutional food preparation, in that meals are not prepared individually on the day of consumption. Instead, large quantities of individual items are prepared by a centralized "production kitchen" and placed in cold storage for up to five days. For example, the production kitchen staff will prepare all the entrees for several days on Monday morning and during the afternoon they may prepare all the hot cereal, etc. The two-inch pans are essential for this method to be

successful. The food is held up to five days, beginning with the day of production. Most blast-chillers used by CDCR are built as walk-through units. Each rack of food then moves in the front door and is pulled directly into the bulk storage refrigerator after blast chilling is completed.

Cafeteria service is the most common form of meal service used in California prisons. The open line and the closed line are the two types of cafeteria service used by CDCR. In open line service, inmates are allowed to see what the server is placing on their trays. In close line service, inmates are not able to see the servers and the tray is provided through an opening in the wall of the serving line. Many correctional facilities are implementing the closed line service because it affords better control. Arguments and pilferage are held to a minimum. The meals are served on re-usable plastic safety trays which are returned to the Main Kitchen scullery to be cleaned, rinsed, and sanitized and ready for use for the next meal service.

Cell Feeding

Cell feeding is commonly used in correctional treatment centers (CTC), administrative segregation (Ad Seg) and security housing units (SHU). Two meal delivery systems are commonly used. They are delivery of food items in volume and delivery of prepared trays to the units. These meals are served on re-usable insulated food serving trays which are accounted for after each meal and returned to the Main Kitchen scullery to be cleaned, rinsed, and sanitized and ready for use for the next meal service.

The Pre-Made Box lunches and Kosher meals are served in compostable, bio degradable material and wrapped in food grade plastic.

Environmentally Preferable Purchasing

State agencies are required to purchase and use environmentally preferable products (EPP) that have a reduced effect on human health and the environment when compared with competing goods that serve the same purpose, per CA Public Contract Code (PCC) 12200-12217.

The State Agency Buy Recycled Campaign (SABRC) is a state mandated program that requires the reporting of all purchases made within 11 specified product categories. All state agencies are required to verify the recycled-content of all products purchased within each of these categories. All businesses shall certify in writing to the contracting officer or his or her representative the minimum percentage, if not exact percentage, of postconsumer recycled-content (PCRC) material in the products, materials, goods, or supplies offered or sold to the State regardless of whether the product meets the minimum content requirements specified in law (see reverse side). The certification shall be furnished under penalty of perjury. The certification shall be provided regardless of content, even if the product contains no recycled material. A State agency may waive the

certification requirement if the percentage of postconsumer material in the products, materials, goods, or supplies can be verified in a written advertisement, including, but not limited to, a product label, a catalog, or a manufacturer or vendor Internet website.

Reducing Impacts

The environmental impact of the goods purchased by CDCR can sometimes be larger than the impact of Department operations given its significant size and volume of transactions. CDCR is committed to reducing the environmental impact of the goods and services purchased.

CDCR buyers are encouraged to purchase Green/EPP-compliant goods and goods with post-consumer-recycled content whenever feasible. Additionally, service contracts require contractors to self-certify that they will comply with PCC 12200.

Extensive and continued efforts have been put forth to improve CDCR's State Agency Buy Recycled Campaign (SABRC) compliance and reporting accuracy. The Office of Business Services (OBS) is committed to continued participation in



the Department of General Services' (DGS) Performance and Environmental Standards (PES) workgroup to enhance and share knowledge and understanding of EPP purchasing standards and contract language for use in solicitations. Additionally, CDCR OBS has committed to participate in the Sustainable Purchasing Leadership Council (SPLC) Benchmark Cohort Pilot to ensure

CDCR buyers are kept up-to-date on the latest in supply chain sustainability. OBS believes the SPLC Benchmark Cohort Pilot will assist buyers in understanding how to efficiently and accurately incorporate sustainability in their procurement decisions.

CDCR is working toward implementation of consolidated orders to create ease of ordering, reduce costs, and decrease deliveries per commodity. OBS encourages EPP purchasing through statewide contracts using SABRC-compliant products. OBS is taking additional steps to create policy that will require inclusion of DGS purchasing standards and specifications for select commodity purchases. OBS is streamlining processes and in many instances removing paper forms. OBS will continue to provide EPP training as needed.

CDCR ensures purchases are EPP-compliant for the following categories:

- Paint (i.e. master painter's institute certified paint and recycled paint)
 - Buyers are encouraged to utilize the Green/EPP-compliant statewide contract for recycled paint whenever feasible.
- Janitorial supplies and cleaners (EcoLogo, Green Seal certified cleaners, DGS_471318A Purchasing Standard compliant)

- OBS requires that all institutions with sub-delegated purchasing authority participate in the CDCR/CALPIA Centralized Procurement Program (CPP). CALPIA cleaning products (janitorial, laundry, and kitchen) are purchased annually through the CPP process and delivered to locations per an agreed-upon annual delivery schedule. CALPIA products meet the EPP Green Seal standard, and consolidated annual ordering reduces the need for small on-demand deliveries.
- Janitorial supplies, paper products (i.e., SABRC compliant and DGS_141117A Purchasing Standard Compliant)
 - OBS conducts quarterly consolidated solicitations on behalf of participating institutions for toilet paper and paper towels. All of the toilet paper and paper towels purchased through the consolidated ordering process are SABRC compliant.
- Desk Lamps (DGS-391115-A Purchasing Standard compliant)
 - CDCR buyers are encouraged to purchase Green/EPP compliant goods and goods with post-consumer recycled content, whenever feasible (per policy).
- Office equipment (i.e. Electronic Product Environmental Assessment Tool (EPEAT) compliant and EnergyStar rated printers, copiers and DGS_432121A Purchasing Standard compliant for high-end multifunctional devices) and paper products (i.e. Sustainable Forestry Initiative certified, SABRC compliant copy paper, DGS-441200-A Purchasing Standard compliant)
 - CDCR purchases Green/EPP/SABRC compliant equipment and copy paper from the DGS statewide contract.
- Remanufactured toner cartridges (available from CALPIA and statewide contract ID/Number: 1-15-75-61)
 - CDCR purchases SABRC compliant toners from the statewide contract and CALPIA whenever feasible.

Measure and Report Progress

Institutions utilize contracted vendors for diversion of their organic waste. Monthly tonnage is reported to the Energy and Sustainability Section (ESS) by each vendor equal to the sum of that month's weight receipts from each pick up. These amounts are recorded and maintained by ESS to track the total amount of waste diverted from each institution. CDCR's project management consultant and ESS developed dashboard reports on the Facility Records and Management Enterprise (FRAME) site to show CDCR's organic waste diversion efforts.

CDCR's OBS department trains buyers in the benefits of buying EPP products and how to apply best practices and standard specifications to procurements. OBS is

also taking steps to create policy that will require the inclusion of DGS purchasing standards and specifications for select commodity purchases. Currently OBS is developing a policy that will increase the use and oversight of the DGS Purchasing Standard DGS-411200-A when competitively soliciting bids for copy paper. OBS commits to finalizing and implementing this policy in the summer of 2018. CDCR's OBS participates in the PES workgroup and SPLC and provides knowledge transfer to the buyers.

CDCR only tracks SABRC and does not currently have an EPP tracking mechanism in place. OBS will collaborate with the Enterprise Information Systems staff to develop EPP identification and tracking methods within the purchase order in the Systems Applications and Products (SAP) program. EPP data entered into the purchase order can then be accessed in the State Contract and Procurement Registration System (SCPRS).

Extensive and continued efforts have been put forth to improve CDCR's SABRC compliance and reporting accuracy. OBS facilitates and includes SABRC training in annual training efforts. OBS also has an analyst tasked with oversight of SABRC compliance for all CDCR entities with sub-delegated purchasing authority.

OBS requires all entities with sub-delegated purchasing authority to submit individual SABRC reports annually to CalRecycle. OBS verifies and monitors each

entity's SABRC data and overall compliance. This process enables OBS to identify and address non-compliant categories more efficiently. The OBS SABRC analyst provides individual training on an as-needed basis to assist entities with sub-delegated purchasing authority in SABRC compliance.



OBS' ongoing strategy to achieve the 50 percent minimum goal in each category is to:

- Work with the BIS team to enhance reporting capabilities and accuracy in SAP.
- Increase oversight of locations with sub-delegated purchasing authority through a quarterly review process.
- Research commonly purchased non-SABRC compliant commodities and identify comparable SABRC compliant products.
- Inform buyers of the research results and encourage them to purchase the SABRC compliant products.

This strategy, in conjunction with enhancing the use of SABRC compliant specifications and DGS Purchasing Standards, will put CDCR on the path to achieving the 75 percent SABRC goal excluding antifreeze, paint, and tires by 2020.

Sustainability Development and Education

CDCR promotes the understanding and advancement of sustainable procurement both internally and with external suppliers by including language in all service contracts to ensure bidders/contractors are aware of the EPP requirements. The following language is required by DGS in their General Terms and Conditions, Exhibit C, and is also included in all CDCR contracts:

"RECYCLING CERTIFICATION: The Contractor shall certify in writing under penalty of perjury, the minimum, if not exact, percentage of post-consumer material as defined in the Public Contract Code Section 12200, in products, materials, goods, or supplies offered or sold to the State regardless of whether the product meets the requirements of Public Contract Code Section 12209. With respect to printer or duplication cartridges that comply with the requirements of Section 12156(e), the certification required by this subdivision shall specify that the cartridges so comply with Public Contract Code Section 12205."

As previously noted, OBS currently has one analyst tasked with SABRC compliance and reporting for all entities purchasing under CDCR's non-IT goods purchasing authority. This position is also tasked with PES workgroup and SPLC participation.

CDCR has confirmed that EPP training through the California Procurement and Contract Academy (CALPCA) has not been offered since 2013 and is not currently available for staff to complete. If/when DGS CALPCA offers EPP training, CDCR will support training enrollment for its buyers. CDCR currently has 62 employees assigned as buyers.

In addition to these efforts, CDCR has established sustainability coordinators at each of its institutions and developed a website and other educational materials to promote a greater understanding of CDCR's sustainability efforts to increase awareness amongst its staff of how employees can contribute in these efforts.

Location Efficiency

Location efficiency refers to the effect of a facility's location on travel behavior and the environmental, health and community impacts of that travel behavior, including emissions from vehicles. Locating Department facilities in location-efficient areas reduces air emissions from State employees and users of the facilities, contributes to the revitalization of California's downtowns and town centers, helps the Department compete for a future workforce that prefers walkable, bikeable and transit-accessible worksites, and aligns Department operations with California's planning priorities.

Location Efficiency is determined by the use of the Smart Location Calculator, which can be found here: <u>Smart Location Calculator</u>. The Calculator provides a Smart Location Index (SLI), which ranges in value from 0-100, where 0 indicates the least location-efficient site in the region, and 100 indicates the most location-

efficient site. These scores are relative to the region and should not be compared across regions.

CDCR coordinates its leasing efforts with DGS, as it is the leasing authority for real property for State Agencies. CDCR must take into account many factors when selecting new lease locations and is faced with several constraints. The California Penal Code places limitations on the locations of parole offices, such as maintaining a set number of miles away from schools, parks and victim residences. In addition, parole offices should be in close proximity to the parolees being served, or at least accessible by public transit.

The State of California currently offers partial reimbursements for State employees using commuter buses or regional transit to encourage reducing commuter traffic, particularly in urban areas. CDCR's headquarters operations is located in Sacramento's downtown core, immediately adjacent to the city's transit line which makes this means of commuting attractive to the Department's employees. This location also includes multiple vehicle charging stations and includes on-site showers and bike storage for employees using this transit option. CDCR recently added a free Bike Share program to employees at its headquarters' location to use to travel in and around the city during the weekday.

CDCR's Leasing and Property Management Section works with the assigned DGS leasing manager to analyze each potential location, its amenities, and other improvements. In the future, CDCR will ensure that this process includes consideration of the location efficiency score in selecting leased spaces. For example, if two or more spaces are available in an area being considered, preference will be given to the space with the higher location efficiency score, provided that the space meets all other departmental criteria and goals. CDCR's goal is to increase the average location efficiency score for all new leases to 10 percent higher than its January 1, 2017 baseline. All new executed leases since January 1, 2018 are shown below in **Table 44**.

Table 44- Smart Location Score for New Leases

Facility Name	Smart Location Calculator Score
Stockton Parole Office	83
Red Bluff Parole Office	74
Redding Parole Office	71
Sacramento Parole Office	67
West Covina Office of Correctional Safety	66
San Luis Obispo Parole Office	62
Riverside Parole Office	61
Irvine Parole Office	59
Salinas Parole Office	39
Sacramento Office (FPCM/OPOS/EIS/OBS)	28
Sacramento Accounting Office	28
Average / 2017 Baseline	58

The lowest scoring leases in CDCR's portfolio are shown below in **Table 45**. The two Sacramento locations are just outside the core Sacramento metro area and were lease renewals that were entered into years ago after the CDCR office needs exceeded the available space in its downtown location. CDCR will continue to evaluate its lower scoring lease locations and market availabilities in the Sacramento metro region for consolidation in future negotiations.

Table 45- Lowest Smart Location Score Leases

Facility Name	Smart Location Calculator Score
Sacramento FPCM/OBS/EIS/OPOS Office	28
Sacramento Accounting	28
Salinas Parole Office	39