



# Summary of and Response to Comments on the Draft ACUPCC Implementation Guide

ACUPCC Coordinating Organizations\*

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## Introduction

A draft ACUPCC Implementation Guide was made available for comment to signatories and the campus implementation teams, as well as the Implementation Advisory Committee and other interested parties for a 5-week period between June 25 and July 31, 2006. In total, we received comments from over 50 individuals (Appendix 1 provides a complete list of reviewers). This document summarizes the substantive feedback received, and describes any changes that were made as a result. Unless otherwise specified, the changes discussed were made to the Implementation Guide. Complete documentation of all feedback received is available upon request: [acupcc@aashe.org](mailto:acupcc@aashe.org).

## Summary of the Feedback and Changes Made

The comments below are organized according to the section of the Implementation Guide they refer to. In addition to the changes described below, a variety of minor formatting, spelling, and grammatical changes were made. Overall, much of the feedback was positive, and a quarter of the reviewers recommended no substantive changes.

### Executive Summary

One reviewer suggested shortening the Executive Summary and another advocated using a more supportive and encouraging tone. As a result, we shortened the Executive Summary and changed the tone to be less prescriptive and more supportive.

### Who's Who in the ACUPCC

One reviewer asked for greater clarification on the role of the Steering Committee. However, the current description of the Steering Committee as chief governing body seemed sufficiently clear, so we did not make any changes. Further delineation of the Steering Committee's role is outside the scope of the Guide.

### Implementation Periods

One reviewer suggested it might be simpler if everyone reported on September 15 each year, instead of having three staggered start dates and reporting deadlines. While this would seem simpler, having the three staggered reporting periods was designed to allow implementation to begin fairly soon after a signatory signs the Commitment. For example an institution signing in January would not have to wait until September to officially start implementation.

## **Organizational Boundaries**

One reviewer asked for clarification on how to deal with leased space that is shared with another entity, and another reviewer expressed concerns about being expected to reduce emissions from leased space over which the institution has no operational control. To address these concerns, we added a line referencing the *Greenhouse Gas Protocol Corporate Accounting and Reporting Standard* for guidance on dealing with leased facilities. This standard gives signatories a choice between two consolidation approaches for determining whether and how to count emissions from leased facilities. Under one of these approaches, signatories are only expected to report on emissions from leased facilities over which they have operational control.

Another reviewer suggested phasing in the inventory of minor organizational units such as satellite campuses, research farms and field stations. This reviewer went on to suggest that no allowance should be made for signatories to exclude organizational units that present a unique and unduly burdensome challenge since this is inconsistent with the overall goal of reducing emissions. While we agree with this sentiment, we believe that some institutions would not sign without this flexibility. We think more emissions will be reduced overall if institutions concerned about the challenges of unique facilities participate in the Commitment than if they were to opt out for this reason. We also expect that through their participation in the Commitment, such institutions will eventually decide to drop the exclusion.

## **Institutional Structures**

Several reviewers commented on the need to empower the institutional structures charged with implementing the ACUPCC to ensure that they can be effective. These reviewers advocated requiring the participation of high level officials in the institutional structure. In response, we added a line about the need to empower the structure and appoint high level participants. However, we chose not to require the participation of any position in particular, as we believe decisions about the appropriate composition of the structure are best made at the institution level.

Another reviewer suggested adding local government officials as an optional group for participation in the structure. We did so.

## **Greenhouse Gas Emissions Inventory**

One reviewer suggested asking signatories to report on the sources of the emissions coefficients they chose to use. We agree that this is a good idea, and added information to both the GHG Inventory section as well as the Reporting section stating that signatories will be asked to report on the calculator and the emissions coefficients that were used.

A different reviewer encouraged us to remove most of the guidance around GHG inventories from the Implementation Guide and put it in a separate document focused on inventory methodology. Since the Implementation Guide is intended to serve as the "handbook" for the ACUPCC, we believe that basic guidelines surrounding GHG inventories are appropriate to include. However, we are considering the production of a separate, more detailed guide on GHG inventories for ACUPCC signatories. After the release of such a guide, we may reconsider what information about inventories is necessary for inclusion in the Implementation Guide.

Another reviewer recommended including a paragraph about how to address gifts or purchases of new buildings in tracking emissions over time. This issue is addressed in the subsection of the Guide on temporal boundaries which directs users to consult Chapter 5 of the *Greenhouse Gas Protocol Corporate Accounting and Reporting Standard* for detailed guidance.

Finally, a fourth reviewer suggested encouraging signatories to use ENERGY STAR's Portfolio Manager for a more in-depth analysis of energy use of campus buildings. Since this tool doesn't seem directly

relevant to conducting a GHG inventory, we felt that this was not the appropriate place to promote this tool.

### ***Temporal Boundaries***

Several reviewers questioned the need to calculate emissions every year since 2000. The intent of the original recommendation was to provide signatories with a good understanding of their emissions trajectory over time, which will be important to take into account during the climate neutral planning process. However, the choice of 2000 as a start date for emissions calculations was somewhat arbitrary, so we changed the language in this section to let signatories decide for themselves how far back to track their emissions.

### ***Operational Boundaries***

One reviewer advocated adding a note explaining that non-CO<sub>2</sub> gases were unlikely to comprise a significant proportion of an institution's overall emissions. We did so. At the recommendation of this same reviewer, we removed the paragraph explaining why water vapor emissions are not included in campus inventories.

Another reviewer recommended requiring all participants to use the same global warming potentials (GWPs) instead of allowing participants to choose between the GWPs included in the Inter-governmental Panel on Climate Change Second Assessment Report and those from later Assessment Reports. While we sympathize with the desire for greater consistency in reporting, we decided to keep the flexibility of the original draft. Since international convention and many GHG programs including the California Climate Action Registry continue to use the GWPs contained in the IPCC's Second Assessment Report we think it would be unreasonable to prohibit the use of these GWPs. On the other hand, we don't want to prohibit other signatories from using the most up-to-date GWPs available. As a practical matter, the choice of GWPs is unlikely to make much difference in an institution's total emissions since the emissions that would be affected by a change in GWPs are likely to be fairly insignificant to begin with, and the changes between the GWPs in the Second Assessment Report and the GWPs in the Third and Fourth Assessment Reports are fairly small and counter-balancing (the GWP of CH<sub>4</sub> increased from 21 to 23 while the GWP of N<sub>2</sub>O decreased from 310 to 296).

Two reviewers asked for a definition of fugitive emissions, while several others asked for clarification on the exact definition of commuting. We added definitions of both, in this section as well as in the glossary. In response to questions from reviewers, we also added further specification about which air travel emissions are to be counted.

Reviewers also asked for clarification on which Scope 3 emissions signatories are required to inventory so we tried to further clarify that commuting and air-travel are the only Scope 3 emissions sources that signatories have agreed to track. We added a line to the ACUPCC definition of climate neutrality to further emphasize this.

One reviewer suggested the designation of particular protocols for calculating emissions from commuting and air travel. In the interest of flexibility and recognizing that signatories are already using a variety of emissions calculators, we opted to retain the policy of allowing each signatory to choose its own methodology. By requiring signatories to report on the tool used and the source of emissions coefficients, we believe fair comparisons will be possible.

Finally, one reviewer recommended the addition of metropolitan planning organizations as a possible source of information about commuting. We think that specific information about where to find emissions data is beyond the scope of this guide. Further, use of community-wide averages for commuting data is discouraged since such data wouldn't capture the benefits of transportation demand management activities undertaken by the campus. Instead, we recommend institution-specific transportation surveys that will clearly show the impacts of transportation demand management activities undertaken by the institution.

### ***Small Emission Sources (De Minimis Emissions)***

One reviewer asked for examples of emissions sources that might count as *de minimis*, while another requested that we note the likelihood that non-CO<sub>2</sub> emissions will be *de minimis*. We added a paragraph using non-CO<sub>2</sub> emissions as an example of a possible *de minimis* emissions source.

### ***Verification/Certification***

Two reviewers suggested the creation of a voluntary peer review matching system as a way to promote quality inventories and to facilitate knowledge sharing. The supporting organizations agree that this makes sense, and we plan to create such a system. However, since this system has not yet been created, and its use will be voluntary, we do not think it necessary to add mention of it within the Implementation Guide.

### ***Tangible Actions***

Many reviewers suggested the addition of new tangible action options. Suggestions included on-site plant improvements, building energy efficiency upgrades and retrofits, graduation requirements in sustainability, sustainable procurement, water conservation, and energy use education. These suggestions seemed to be based on concerns that a particular emissions reduction opportunity was being left out, which we think highlights the need to explain the intended purpose and function of the tangible action items. We added language clarifying that the tangible action items are not intended to be a comprehensive listing of all possible strategies, rather, they are intended to be meaningful and concrete actions an institution can take in the short term to demonstrate its commitment to climate neutrality while it is developing its climate action plan. Most of the suggested additions didn't fit these criteria. Moreover, the addition of new tangible action options would necessitate a change in the Commitment document. This would cause confusion for many signatories and the general public, and is beyond the scope of what we were intending in our request for feedback. As a result, we did not add any new tangible action options. However, the types of activities suggested by reviewers are potentially very useful as components of the climate action plan and we encourage signatories to consider them in that context.

One reviewer suggested requiring that tangible actions be implemented within one year. While we sympathize with the desire for fast action and hope that signatories will move quickly in undertaking their tangible actions, we are mindful of the fact that some campuses may need a little more time to build institutional support for some of the tangible options. Since the Commitment specifies only that two (or more) tangible actions be taken "while the more comprehensive plan is being developed" it would not be fair to existing signatories to mandate that the tangible actions be taken in only one year.

### ***A. Green Building Policy***

Many reviewers noted that LEED Silver certification does not necessarily mean that a building is energy efficient. These reviewers suggested that we require signatories to earn several LEED credits related to energy. We agree with the intent behind these suggestions, but believe that such a change would necessitate a change in the Commitment (which only specifies LEED Silver) and would be unfair to existing signatories who had signed on before such a requirement had been established. So, instead of requiring specific energy credits, we added a recommendation that signatories mandate achievement of specific energy credits within their green building policies.

Similarly, reviewers advocated for the requirement of LEED-EB certification for existing buildings. We again think it would be unfair to existing signatories to add a new requirement at this point.

One reviewer suggested that we make clear that the green building policy is intended to apply to major renovations, as well as new buildings. We did so.

One reviewer recommended that green building standards should only be required on a majority of new buildings rather than on all new construction. Since the Commitment references all new construction, and applying green building techniques to all new buildings is not unrealistic (it is already policy on many campuses), we did not make the recommended change.

### ***B. ENERGY STAR Procurement Policy***

One reviewer suggested that the ENERGY STAR procurement policy does not go far enough, and we should instead require a full replacement of all appliances over a 2 year period. As this goes well beyond what is stated in the Commitment, such a change would be unfair to existing signatories.

The same reviewer suggested that the example of Villanova University's policy of purchasing ENERGY STAR products "whenever financially possible" was insufficient. We are aware of no existing ENERGY STAR purchasing policy that does not include a similar qualifier, and we believe that institutions would understandably be hesitant to commit to purchase ENERGY STAR products in all circumstances, regardless of the cost difference. We therefore decided to keep the Villanova example and the statement that policies can include a qualifier limiting application of the policy to "whenever financially possible," "when the extra cost is less than or equal to the resulting energy savings," or "wherever practical."

### ***C. Air Travel Offsetting***

Two reviewers stated that the ACUPCC Supporting Organizations should make recommendations about which offset suppliers to use. We believe that the Implementation Guide is not the appropriate place to make specific recommendations that, given the evolving nature of the offset market, are likely to change frequently. Instead, we opted to provide general guidance about what to look for when purchasing offsets and we provided links to two recent reports that will help signatories select offset suppliers. Additionally, we are planning to work with interested signatories to form an offset purchasing consortium that will further help signatories navigate the offset market.

One reviewer encouraged the addition of steps to reduce campus air travel. Requiring such steps would go beyond what is stated in the Commitment, and would be unfair to existing signatories. We did however add a recommendation that signatories consider actions to reduce air travel.

One reviewer suggested that institutions should be able to track their air mileage without much difficulty, and therefore we shouldn't allow the estimation method described in this section. Feedback from many signatories suggested that tracking air miles traveled for the entire institution is actually quite difficult, at least at present. We added language to indicate that use of the estimation method is intended to be temporary and should eventually be replaced with a tracking system.

One reviewer argued that the example of College of the Atlantic offsetting all of its emissions is cost-prohibitive for most institutions, and that we should not be recommending this. Another reviewer asked for examples of other campuses that are offsetting their air travel emissions. College of the Atlantic is the only institution we are aware of that is currently offsetting all air travel emissions, which is why we provided them as an example. We aren't recommending that all signatories take the same approach as College of the Atlantic.

### ***D. Provision of Public Transportation***

Several reviewers recommended broadening this tangible action to include other strategies for reducing transportation emissions, such as promotion of carpooling, bicycling and walking and the use of alternative fuels. While all of these strategies will help achieve climate neutrality, the language in the Commitment about this tangible action refers specifically to *public* transportation. We believe that changing the meaning of this provision would be unfair to existing signatories.

One reviewer suggested that in order to change behavior, the public transportation subsidy would have to be greater than \$30 per month and that a 50% subsidy for bus passes often won't yield a savings of over

\$30. We have been telling signatories and potential signatories who asked for clarification on this tangible action option, that a 50% discount would count. As a result, it would be unfair to these institutions to adopt a more stringent requirement now.

The same reviewer recommended clarifying that fare-free shuttle system cannot simply transport students between campus and remote parking lots. We did so.

### ***E. Green Power Purchasing***

Two reviewers suggested broadening the scope of this tangible action to focus on all energy consumption, rather than just electricity. We did not make this change because it would necessitate a change in the Commitment, and would be unfair to existing signatories. In response to confusion from one reviewer, we added a sentence clarifying that renewable energy technologies that are not used to generate electricity do not count toward achieving this tangible action option.

Two reviewers asked to be able to use alternative certification and tracking systems for renewable energy credits (RECs) instead of Green-E. In light of the desire for greater flexibility in this regard, we decided to allow RECs that meet Green-E technical specifications, but aren't necessarily Green-E certified. This is identical to the way in which the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) system deals with RECs.

One reviewer expressed concern that the institution's utility doesn't offer green power and so the institution would not be able to achieve this option. The Implementation Guide attempts to correct this misperception by explaining that RECs are available from a variety of nationwide retailers.

One reviewer requested that we distinguish between RECs and direct renewable energy purchases. We did so. Another reviewer advocated that on-site renewable installations be recognized for providing significantly more value than REC purchases. We changed the title of this section and the order of the text so as to emphasize on-site installations, but we believe that a comparison between the different approaches to renewable energy is outside the scope of this section.

### ***F. Climate Friendly Investing***

One reviewer recommended the inclusion of additional climate friendly investment strategies beyond voting on shareholder resolutions, such as direct shareholder engagement with major GHG emitters, and positive investments in climate-friendly technologies and investment funds. The text of the Commitment is focused specifically on shareholder resolutions, and to be fair to existing signatories we are not adding new requirements. We did however add text encouraging signatories to consider additional climate friendly investment opportunities as they undertake this tangible action option.

### ***G. Waste Minimization***

One reviewer suggested that signatories who undertake this tangible action should be required to include emissions from solid waste disposal in their inventory. Emissions from waste disposal are not directly referenced in the Commitment and are considered optional under the GHG Protocol. To be fair to existing signatories we chose to recommend rather than require that signatories who undertake this tangible action include these emissions in their inventory.

At the suggestion of another reviewer, we added the creation of a campus recycling program as one of the example waste minimization measures.

One reviewer encouraged the addition of a link to the EPA's Waste Reduction Model (WARM), which is used to calculate the greenhouse gas emissions reductions from waste reduction. We opted not to follow this suggestion because the WARM tool is not appropriate for use in GHG inventories, and we worry that linking to it would create confusion among signatories.

## **Climate Neutral Plan**

One reviewer recommended the provision of an outline of all the topical areas that should be addressed in the climate action plan. We added a suggested table of contents to help guide signatories in the production of their plans, while keeping it general enough so it is relevant to the variety of institutions represented by signatories.

Another reviewer noted that "as soon as possible" is very subjective. It is intentionally subjective so as to provide flexibility to signatories. Under the Commitment, each signatory will decide for itself what is possible.

To address confusion created by the use of different names to describe the climate action plan we now consistently refer to the plan as a "climate action plan." Also, in response to a query from a reviewer, we added a line explaining that the climate action plan may be part of a larger sustainability plan.

### ***Target Date and Interim Targets***

One reviewer said that that it would be a burden for signatories to evaluate potential for negative social and environmental side-effects of emissions mitigation options. We changed the language to make clear that the list of evaluation criteria we provided is intended to be demonstrative of the kind of criteria signatories may wish to use; but signatories are not required to use any of them.

The same reviewer thought that the suggestion for signatories to consider creating mechanisms to reinvest the savings from energy efficiency and conservation into additional energy projects was inappropriate. Given the importance of such mechanisms in creating paths to climate neutrality that are financially rewarding over the entire process, and given the small number of schools that have such mechanisms in place today, we believe it is appropriate to point out options such as this for their consideration. However, we modified the language slightly in an effort to address the reviewer's concerns.

As suggested by a reviewer, we added "potential to involve students and faculty" and "potential to be scaled upward if successful" as criteria for evaluating carbon reduction projects. In response to a request for examples of campus climate neutral targets, we added a link to AASHE's list of campus global warming commitments.

### ***Curriculum and Other Educational Experiences***

At the recommendation of a reviewer, we added "Inclusion of students on building and construction, operations, and facilities committees" as another educational action for signatories to consider. We also added links to two relevant resources at the suggestion of a reviewer.

### ***Research, Community Outreach, and Other Efforts***

One reviewer noted that research and community outreach are managed by different parts of the institution and suggested creating separate sections in the climate action plan for each. We did so.

At the recommendation of a reviewer, we added "Development of programs that support faculty and staff in making personal efficiency upgrades at their residences, such as subsidized home efficiency audits" as another outreach action for signatories to consider.

## **Reporting Requirements**

One reviewer recommended that signatories should report progress every year, rather than every other year as currently required. This reviewer argued that annual reporting is necessary to maintain momentum and ensure that appropriate resources are allocated to ACUPCC implementation. We believe

that requiring annual narrative progress reports would pose a significant time burden on some signatories, but we did decide to require annual reporting of GHG emissions so as to keep momentum going.

Another reviewer suggested that they would prefer not to report their emissions by scope because their current inventorying process doesn't categorize emissions by scope. Reporting emissions by scope is essential for comparability of data and shouldn't be difficult to do as it merely requires summing emissions from specified sources within each scope. Therefore, we opted to retain the requirement to report emissions by scope

Another reviewer requested a reporting template to ensure uniformity in data collection. We added language to make clear that the online form mentioned in this section will serve this purpose.

## **Definition of Terms**

We added a general definition of "sustainability" at the request of a reviewer. We also added definition of each of the groups described in "Who's Who in the ACUPCC."

## **Other Feedback**

Two reviewers said the timeline was very aggressive, and may be difficult for their institutions to meet. One of these specifically requested that some of the target dates be relaxed. Since all of the target dates described in the Implementation Guide were taken from the text of the Commitment and have been clear from the start of this initiative, we do not believe a change in the timeline is appropriate. Moreover, the Implementation Guide provides a process for applying for extensions, which should enable signatories that are making a good faith attempt to meet the terms of the Commitment to remain in good standing.

One reviewer suggested that offsets had not been covered sufficiently in the Implementation Guide. To address this concern, we created a section devoted specifically to offsets and moved offset-related material from other parts of the Guide into this new section. At the request of another reviewer we also added two additional criteria to help in the selection of offset suppliers.

One reviewer recommended a different title be given to the Implementation Guide, in light of the fact that the document does not include all of the guidance that would be necessary for an institution to actually achieve climate neutrality. We were unable to come up with a more appropriate name for this document and will continue to refer to it as the ACUPCC Implementation Guide.

## Appendix 1: Participants in the Review Process

Feedback on the ACUPCC Implementation Guide was received from the individuals listed below. We greatly appreciate the time and thought they put into their comments.

1. Daniel Asquino - President, Mount Wachusett Community College
2. Ed Barnes - co-chair of the Climate Commitment Task Force, California State Polytechnic University, Pomona
3. Niles Barnes - Administrative and Public Relations Assistant, AASHE
4. Larry Blake - Assistant Vice President for Facilities Management, Northern Kentucky University
5. Davis Bookhart - Manager, Energy and Environment, Johns Hopkins University
6. Kyle Brown - co-chair of the Climate Commitment Task Force, California State Polytechnic University, Pomona
7. Terry Calhoun - Director, Media Relations and Publications, Society for College and University Planning (SCUP)
8. John Callewaert - Director of the Institute for Community and Environment, Colby-Sawyer College
9. David Carr (and other senior staff) – Provost, Richard Stockton College
10. Janice Crede - Lecturer & Resource Specialist and ACUPCC liaison, University of Wisconsin-Superior
11. John Cusack - Executive Director, New Jersey Higher Education Partnership for Sustainability (NJHEPS)
12. Jerry J. DeSantis - Associate Vice President for Facilities, SUNY Oswego
13. Norb Dunkel - Director of Housing & Residence Education, University of Florida; and VP of the Board, Association of College & University Housing Officers International (ACUHO-I)
14. Larry Eisenberg - Executive Director, Facilities Planning and Development, Los Angeles Community College District
15. Alan Fish - Vice President Business Services, University of Miami
16. Michel George - Associate Vice President for Facilities, Seattle University
17. Stephen T. Golding - Executive Vice President for Finance and Administration, Cornell University
18. Cynthia L. Greene - Senior Advisor, US EPA New England
19. Rob Hall - Energy Program Manager, University of Colorado at Boulder
20. Greg Havens - Principal, Sasaki Associates
21. Sharon Hirsh – President, Rosemont College
22. Maria Ivanova - Assistant Professor of Government & Environmental Policy, The College of William and Mary; and Director, Global Environmental Governance Project, Yale University
23. Karyn Kaplan - Recycling Program Manager, University of Oregon
24. Karol Lacroix – President, Granite State College
25. William M. Leahy - Chief Operating Officer, Institute for Sustainable Energy, Eastern Connecticut State University
26. Robert Marietta - Facility Renovations, Sustainability and Safety Manager, Howard Community College
27. Jim Martin-Schramm - Professor of Religion, Luther College
28. Scott Miller (and senior staff) - President, Wesley College
29. Cornelius B. Murphy, Jr. – President, State University of New York College of Environmental Science and Forestry
30. Dave Newport - Environmental Center Director, University of Colorado at Boulder
31. Joseph V. Olenik, Chief Operating Officer, Purchase College
32. Daniel Papp – President, Kennesaw State University

33. Andrea Putman - Associate, Cadmus Group; and coauthor of *The Business Case for Renewable Energy: A Guide for Colleges and Universities*
34. Karen Price - Campus Sustainability Manager, Seattle University
35. Joe Ranahan - Assistant Utilities Manager, Northeastern University
36. Curt Robie - Assistant Vice President Administration, Westfield State College
37. Dean Rodeheaver - Assistant Chancellor for Planning and Budget, University of Wisconsin-Green Bay
38. Debra Rowe – President, U.S. Partnership for Education for Sustainable Development
39. Kathleen Schatzberg – President, Cape Cod Community College
40. Thomas F. Schutte - President, Pratt Institute
41. Leith Sharp - Director, Harvard Green Campus Initiative
42. Larry Shinn – President, Berea College
43. Robin Snyder – Sector Strategies Division, U.S. Environmental Protection Agency
44. Sheila R. Sykes - Vice President for Finance and Administration, Fitchburg State College
45. Mitchell Thomashow – President, Unity College
46. Richard L. Torgerson – President, Luther College
47. Brandon Trelstad – Sustainability Coordinator, Oregon State University
48. Mark van Soestbergen - President, International Carbon Bank and Exchange, Inc.
49. Mitchel B. Wallerstein – Dean, The Maxwell School of Syracuse University
50. Mick Womersley - Interim Provost, Unity College
51. Brian Yeoman - Education Director, National Association for Educational Procurement (NAEP); and City Director Houston, Clinton Climate Initiative
52. Don Zillman – President, University of Maine at Presque Isle

\* Association for the Advancement of Sustainability in Higher Education (AASHE), ecoAmerica and Second Nature