

Responses to STARS 0.4 Survey

AASHE solicited responses to survey on STARS 0.4 for a three week period in November 2007. All responses to the survey as well as the questions themselves are included below.

Survey Respondents

Survey responses were received from the following individuals:

Strategic Advisory Committee Members

1. Sarah Banas - Program Associate, American Association for the Advancement of Science
2. Bettie Ann Brigham - Vice President for Student Development, Eastern University (representing the National Association of Student Personnel Administrators)
3. Mary Jensen - Coordinator of Campus Sustainability, Keene State College (representing the College and University Recycling Council)
4. Mary Spilde - President, Lane Community College (representing American Association of Community Colleges)
5. Jeanne S. Steffes - Associate Vice President for Student Affairs, Syracuse University (representing ACPA - College Student Educators International)

Technical Advisory Committee Members

6. Matthew Biette - Director, Dining Services, Middlebury College
7. Debby Freed - Alternative Transportation Manager, Office of Transportation, Virginia Tech
8. Melissa Gallagher-Rogers - Manager, LEED Government & Higher Education Sectors, U.S. Green Building Council
9. Michele Hallahan - Environmental Specialist, University of Texas at Austin
10. Lauren Heising - Coordinator of Sales & Nutrition, Housing & Dining Services, University of Colorado at Boulder
11. Mark Kelly - Manager Environmental Services, Rutgers, The State University of New Jersey
12. Terry Link - Director, Office of Campus Sustainability, Michigan State University
13. Larry Litten - Retired; previously Director of Institutional Research at Carleton and Dartmouth Colleges as well as the Director of Research at the Consortium on Financing Higher Education (COFHE)
14. Jesse B. Pyles - Service-Learning & Sustainability Coordinator, Green Mountain College

Others

15. Al Lewandowski - Energy Manager, University of Texas at Austin
16. Greg Mella - Principal, SmithGroup
17. Ralph Stuart - Environmental Safety Manager, University of Vermont

Overall

Modules

Some reviewers suggested splitting STARS into separate modules by Category so that each could serve as a stand-alone rating system. For example, the Operations section could be used to achieve a "Green Campus Operations" rating. To achieve an overall "Sustainability" rating however, institutions would have to achieve some minimum number of points in all four modules. Some suggest that this could increase the flexibility of the system and motivate more campuses to use it while remaining true to a comprehensive vision of sustainability. How do you feel about this idea, and do you have specific recommendations regarding the details? (Prerequisites, distinguishing between a module rating and an overall sustainability rating, etc.)

Respondent A

This would be a very valuable step. Conducting a complete STARS survey as currently composed is too large a task for our current staffing level and our current level of development of programming on many issues and will be for the foreseeable future. We would be likely to be able to complete the operations module in 2008 if that was separated out.

Respondent B

I support separate modules. It encourages colleges to start wherever they are rather than not start at all because it's too daunting. You could be clear about the language that colleges would need to use if it was only a partial rating.

Respondent C

I'm in favor of both module and summary ratings. Overall stars (or letter grades) can reflect the sum of module stars. As an incentive to improvement, I believe both section ratings and the overall ratings should be graded on the curve. (How about a letter grade for the summary rating, accompanied by a partial to whole image of the earth—an A would be a whole earth, a B three quarters?)

Respondent D

I think this is a good suggestion. It brings to mind the recent Campus Sustainability Report Card. We got a C- overall, but I was pleased to see that Transportation got an A. It helps to show a university what they're doing well, and where they need to improve.

Respondent E

N/C – other than personally I think it is stronger as a united tool.

Respondent F

I recommend the modular approach. Most institutions' carbon footprint is largely created through operational activities. Allowing them the flexibility to address operational issues first would give them 'permission' to address real time environmental impacts without having to bring every aspect of the institution on board before ANYTHING gets done. Here at our school we are taking a 2 pronged approach – academic sustainability programs and operational programs. What we have realized so far is that the academic side of things will most likely take 10 years to complete, whereas many operational programs can be implemented and completed within 2 – 5 years. It doesn't make sense to hold operations back because academia requires more long term planning.

Respondent G

I believe that there should be an overall rating. Possibly modules can be used for individual institutional purposes to evaluate various areas for improvement or targeting, however in the overall rating I believe that there needs to be one overall sustainability rating.

Respondent H

If there is one thing that disappoints me about the current organization of STARS, it is its heavy emphasis on campus facilities (at least in terms of number of points). While that sector may be, to this point, the most well-developed and the easiest to assess, transforming the campus and educating students about sustainability requires committed action in all aspects of campus life and operations, and an integration across the various campus activities (ie using what is being done on in the facilities department as a learning-laboratory for the engineers; involving business students in campus investment decisions, etc).

I therefore think that it's essential that STARS assesses a campus' overall level of sustainability, not just in one aspect. However, I also agree that it's really important to recognize significant achievements of a campus in one of the specific areas. How to do this? The system that I came up with that seems to best balance these considerations would operate as follows:

The rater would determine the % of points they've earned in any given module (ie. for a module with 48 points, earning 13 would give you a 27%. NOTE: this denominator in each module could be slightly different depending upon the type of college/university depending upon how many of the points are applicable. EG. A community college might have a smaller denominator in the education module because the points about research don't apply)

The percentages from each of the different categories would then be added together to give you a composite score (if you got all points in all modules, you'd earn 400%)

The thresholds for STARS would be based on how many % points you earned overall. (ie. If the threshold for 3 stars was 200%, a campus could theoretically meet that by doing a great job in 2 or 3 categories.

Campuses that reach an high level (perhaps 75%) in any given module could also claim "special distinction in XXX"

I like this approach because it normalizes the points in each module so that the modules all are evenly weighted. At the same time, it doesn't necessarily exclude a campus who is not able to made headway in a particular module. It also provides special recognition to those campuses that are doing really extraordinary work in a particularly module.

I've thought about lots of different techniques for this section (offering a single star for achieving a threshold level in each category; having at least one star in each category in order to be considered for STARS and then going strictly on points, offering different ratings). For the sake of the group, I've included all of my thought process below in case it comes in handy when you are thinking about "fixing" this section.

Here are some thoughts:

Campuses earn a single star for achieving a threshold level in each category. (ie. if the threshold was met in 2 of the 4 categories, they'd earn so stars).

PROs: it really encourages campuses to look at sustainability across their campus—no one module will help them earn a high STARS rating.

CONs: there's now way to distinguish whether a campus JUST met the minimum in each category or really excelled. Doesn't encourage continuous improvement.

Campuses must earn a minimum number of points in each module in order to be eligible for a STARS rating at all. After that, STARS are based solely on number of points.

PROs: campuses must have at least some activity in each module to be eligible; rewards extra achievement in one module

CONs: modules with more points are unfairly weighted

Individual rating for each module and then one of the above for an overall Sustainability STARS score

PROs: Allows campuses to assess their achievement in each module (not just threshold level); recognition for lots of achievement in one

CONs: Doesn't necessarily convey importance of balanced sustainability activity; Too many ratings (each campus would have 5!)

Respondent I

I think that the module system would increase the flexibility and return of the survey because there are many complex components to this area that all are not well versed in but because the energy folks don't know about all of the educational components they shouldn't be penalized. Can there be module ratings and an overall module rating?

Verification/Certification

To provide greater assurance that the submitted data is accurate, we are planning to: require attestations from a "responsible party" and other documentation for every credit; make all submitted data publicly available online; and require a letter from the president/chancellor to accompany the submission. Are there additional steps we could reasonably take to provide greater assurance that the submitted data is accurate (other than requiring outside review)?

Respondent A

This is a reasonable and adequate approach. Something beyond this would again be a significant barrier to participation.

Respondent B

I think this is sufficient. I don't think there will be much abuse. In community colleges, for example, it's a pretty small world. If colleges were not accurately describing themselves, I don't think it would be long before that would be discovered.

Respondent C

Institutional reports should be classified as either "self-reported" or "verified." Overall ratings should be increased by one full point for third-party verified reports.

Respondent D

I don't know about other universities, but getting our president to sign a letter to accompany the submission might be a deal killer for us. Getting an Executive Vice-President, or some such, is much more realistic at Virginia Tech.

Respondent E

Consider an auditing process, not unlike Income Tax. LEED used this as a means of streamlining documentation requirements. The onerous documentation requirements in the original versions of LEED were replaced with certified letter from design consultants to certify compliance, and with that, the USGBC began a policy where one random credit was to be audited.

Respondent F

Yes. I worked as a verification auditor for the ISO (International Standards Organisation) management standards for 5 years. I also sat on the Irish technical committee which advised ISO on the ISO 14001 (environmental management) standard. One way that some companies assessed each other to verify compliance with the standard was to audit each other, eg. a food company and an industrial manufacturing plant in Ireland (living side by side) audited each other

each year, to conduct third party audits. They learned many ideas from each other and also ensured (without cost) that each other was upholding the standard.

Universities and colleges could do this for each other, in state. It would strengthen collaborative bonds and encourage support between educational institutions.

Another commenter says: Yes, to publicly stated and recorded online documents and certifications by the president/chancellor and by the school and requirements for some actual proof of what they claim they are doing.

Respondent G

It might be valuable to have voluntary teams travel occasionally to an institution for a peer review. This would happen only once in a while and with a small group of two or three. The objective would be to witness the evolution of the sustainability program according to what has been submitted and to share that with other schools by reporting on the website. This would encourage accurate reporting and give the institutions the opportunity to share with each other.

Respondent H

In my initial reading, I must have missed that you were requiring “proof” for each credit and would be posting them online for interested parties to verify on their own. This adequately addresses my concerns.

Respondent I

Letter from Pres. And other verifying and publicly posted documentation is good.

Boundaries

How can we improve the definition of "boundaries" (and allowable exclusions) in STARS? Here is how it currently reads:

Generally, each campus will be expected to include all of its land holdings, facilities, and satellite campuses when completing the rating. If an institution has multiple campuses with presidents or chancellors, then each campus may complete its own STARS checklist. If an institution finds it necessary to exclude a particular unit from its submittal, the reason for excluding it must be provided in the report accompanying the submitted checklist.

Respondent A

In my opinion, this is too open ended to be useful. Often data is only available for specific portions of campus. I think that the boundary definition must be left in the hands of the organization to define and publicly document (as it is in the ISO 14000 system).

Respondent B

I think this definition is fine as is.

Respondent C

One complication here is that some private institutions own real estate that is effectively part of their “endowment” that is leased for commercial purposes. Another is that some institutions lease or rent commercial real estate for their own educational/research/ service functions. Ideally, all owned and leased real estate would be incorporated into the report in order to account

for the institution's impacts. Probably the best we can do is to encourage the inclusion of everything, but collect the following data:

Square footage of buildings owned by the institution (both used by the institution and leased to others). Percentage of this square footage represented in STAR data.

Square footage leased from other parties for institutional use. Percentage of this square footage that is included in STAR data.

Respondent F

When registering for certification to the ISO standards, a company can elect to choose what operations/ facilities they register. Intel registered each global facility one by one, so they were able to streamline processes one location at a time. Now, all their facilities worldwide are registered to the ISO 14001 environmental management standard.

In the same way, a campus with multiple locations might elect to have one campus registered to STARS, and then choose to add others sequentially, in order to focus on one campus at a time. By allowing institutions to choose physical locations one by one, we would allow them to address sustainability one bite at a time rather than trying to swallow the whole elephant in one go!

Respondent I

Not sure how to best assist in this area, as campuses start to branch out and lease spaces on other campuses and in other cities this will become more complicated.

Rationale for Selecting Indicators

Several reviewers expressed hesitations about trend-based credits, while others suggested there were too many strategy-based credits. Please identify any trend-based credits or strategy-based credits that you recommend omitting (and why) and how you might convert them to other question types that capture the same outcome.

Respondent C

I would request both trend and current absolute performance data where the present credit asks for trend data and give points for superior relative current performance (absolute data); relative current performance would be based on the institutions reporting in the pilot and then subsequent data collections. I would also give the option of measuring trend data over longer periods and assess all trend data in percentage changes (first two years in series compared to last two years, to reduce the effects of short-term fluctuations).

Respondent E

In terms of resource consumption from campus operations, I think there are some minimum thresholds that should be adopted which might accompany a trend-based credit. OP Cred 13 (Energy Intensity – Trend) might be replaced with a better metric for energy intensity reduction. One example would be to reference the 2030 challenge goals (which require 50% less energy than a typical building as defined by the CBECS database, now; 60% less energy by 2010, and additional 10% increments every 5 years culminating in carbon-neutral by 2030. This policy has been adopted by the AIA as well. These thresholds could be tempered towards a target of 80% less energy by 2050.

The trend-based credits for Water Consumption strike me the same way as well, and might be better as performance based credits, like the LEED rating system. One point for a 10% reduction in water consumption (baseline as defined by the EPA 2005), two points for 20% reduction, etc...

My concern is that the trend-based approach may not result in significant conservation efforts. The EPA 2005 does not govern irrigation water so the performance-based approach should be similar to the way LEED defines baselines.

A trend-based credit for LEED-EB seems okay, recognizing that one can't simply commit to LEED-EB assessments for all building stock, but I do think the LEED-CI does not need to be a trend because LEED-CI can be applied to only new construction projects, and therefore, the metric should be to required LEED-CI certification for all future interior construction.

It is a little outside of my realm of expertise, but I wonder if the trend-based credit for GHG Emissions of the campus fleet, is too weak. Simply slowly purchasing vehicles with slightly improved efficiencies would earn this credit. More significant goals could be defined, but the challenge is to create a baseline on which to measure performance against. (achieve 20% improvement over a baseline, etc...)

Definitions of Sustainability

AASHE intends to provide enhanced guidance related to the definition "sustainability" in STARS 0.5. We are evaluating the Earth Charter (http://earthcharterinaction.org/about_charter.shtml) among other sustainability definitions and concepts such the 3 Es, triple bottom-line accounting, and the 3 interlocking circles for this purpose. Do you have any thoughts about this or other suggested definitions to review?

Respondent B

Keep it simple!

Respondent I

I like the current definition and can easily teach the triple –bottom line to others without a lot of jargon or difficult semantics- Keep it simple.

Institutional Profile

Campus population will be used to normalize certain indicators. Do you have a suggestion for how to best define “campus population” in a way that takes into consideration the variation in length of time different populations spend on campus and other factors that may confound quantifying populations? What is your experience with normalizing by various measures of “campus population”?

Respondent A

Normalizing by “campus population” alone will significant skew any comparisons because of the different sets of support services provided by various municipalities. Based on my review of intermural comparison efforts in the Lab XL project, comparisons between campuses should be eschewed until at least the first round of recertifications are complete.

Respondent C

The federal government's IPEDS fall counts are the most readily available and widely employed means of population standardization. This, however, penalizes campuses that use their campuses relatively efficiently by having full summer term programs. I'd vote for average counts (enrollment, employee FTEs) for all possible terms (4 quarters, 3 semesters) with a zero included in the enrollment numerator for any term in which enrollments do not occur.

Respondent G

Campus population will vary greatly depending on the programmatic offering of the Institution. I would think that enrollment figures with full time equivalents, computed by month, would work for this.

Respondent J

I would recommend the use of IPEDS, since this is a most difficult question to answer on any campus and everyone could easily count differently (should you include summer students, camps who use the facilities, non-credit classes and more?).

Respondent I

Probably the Standard FTE as recorded in the semester freeze dates would be the best indicators of population. The current population might be too transient to gauge for any other marker.

Governance and Finance

1. **GF-Prereq1: Is having some sort of formal body devoted to sustainability such an important first step that it should be a required to achieve a STARS rating? Should we be more flexible about the exact form such a body takes, or should we be more specific about the composition of the body, how frequently it should meet, and who it reports to?**

Respondent A

Yes, with maximum flexibility.

Respondent B

Please don't get prescriptive about this. It will discourage participation. Each college has its' own culture and different structures work that fit the culture. As long as work is being accomplished, why do we care how an institution gets it done? This is a process outcome – how things are done We should focus on results.

Respondent C

I'd add a requirement that the "body" include or report directly to a senior officer.

Respondent K

Yes, for if there is no such organization then most likely no buy-in by an organization. You should be more specific, for without order one ends up with no clear plan of action or measurable results.

Respondent G

There should be a formal body registered with this organization; however the composition of that body should be flexible due to the diversity of the institutions. I would think that a requirement should be that students are involved and that there is one person who is the primary person leading the body. The rest of the group can be decided upon by the institution according to their needs/goals.

Respondent I

More flexible, some schools are just learning the language and the culture of this may still be driven by students with a secondary buy in by administration or faculty or vice versa

2. Should we create a credit for having a sustainability awards or other sustainability public recognition program? If so, how should we define the credit to ensure that such programs are meaningful and significant?

Respondent A

Yes. The fact of the program is meaningful and significant no matter how defined.

Respondent B

I don't feel strongly about this either way.

Respondent C

Annual awards announced to both the campus and the general public through news releases and Web site postings.

Respondent K

Absolutely, without recognition, there are no participants. I will leave the exact definition to greater minds!

Respondent I

If not give credit for awards- give examples of how some campuses have provided visible symbols of campus work in this area.

INSTITUTIONAL COMMITMENT

1. GF2: Should formal adoption of the sustainability implementation plan be required? Given the potential risk that formal adoption may lead to a "weakened, compromise version" of the plan, is it more effective for the plan not to be formally adopted? (Which is likely to have the most impact?)

Respondent A

Yes. The official version will be weakened and compromised, but it is also open to improvement with time.

Respondent B

Again, this is process outcome that I don't think we should focus on. We should be looking for tangible results – the "what" not the "how." Each institution will do what is necessary and fits their method of governance. Further, there are some areas of the country where it isn't politically acceptable to be working on this. Presidents may be engaged in "stealth" initiatives! Let them get on with it. If you force this kind of thing they may do nothing.

Respondent C

Yes. If formal adoption weakens the plan, the consequent negative effects will be reflected in the other data in the STARS report. Without formal adoption, the plan is less likely to carry weight.

Respondent K

Either an organization is on board or not.

Respondent I

No-just like I don't have the funds on my campus to build all LEED Platinum, I am still going to shoot for LEED silver. Don't put people back into a corner .

2. GF3: How should we define "sustainability officer"? There is wide diversity in the functions and reporting structures of existing sustainability officers. Which structures and functions demonstrate greater commitment to sustainability? How should we use the point structure to encourage the structures and functions that represent greater commitment?

Respondent A

You shouldn't.

Respondent B

Another prescriptive process outcome. Jobs will be created depending on the work that needs to be done –this is well covered in other parts of STARS. Don't start telling institutions how they need to organize. For some colleges, the work may be distributed; for others contained in one job.

Respondent C

How about changing the referent to “an office” and having the measure reflect sustainability FTEs per 1000 employees (or some other denominator), with points given for relatively higher levels of staffing. I say this, recognizing that any measure where “more is better” is an invitation to inefficiency. This can partly be mitigated, however, by the inclusion of the many performance measures in the STARS system so that a bloated sustainability bureaucracy would have relative poor results elsewhere.

Respondent K

Higher the level up-the firmer the commitment. I'll leave the point structure to you guys!

Respondent J

Just having one represents commitment, but it certainly represents something different at each campus. The higher up you report, the better.

Respondent I

Full time vs. part time commitment, other staff and resources, staff or line position and reporting structure; student government connection, university senate committee

3. GF5: What are the best practices for shared governance? What specific criteria would you require for earning this credit?

Respondent B

There are a number of answers to that question and certainly the definition of shared governance is not universally agreed upon. Many institutions operate in a labor environment which puts shared governance in a different light. We have a very robust governance system but it was designed to fit our college and may not work somewhere else. You can't “one size fits all” shared governance.

Respondent I

University Senate sub committee with resources to lead and guide academic, co-curricular programs and activities including community service and community involvement

4. Should we add a new credit based on the “percentage of staff that have sustainability functions written into their job descriptions”? Do you have suggestions for defining "sustainability functions"? Who would you include as “staff”? What percentage of staff should have sustainability functions in their job descriptions in order to earn a point?

Respondent A

This is not appropriate in this round of the system. It provides grounds for future improvement.

Respondent C

Yes. Same breaks as other percentage-based measures. On the topic of scales: all scaled credits should have either 4 OR 5 levels and the intervals should be equal. In some current scalings, the top percentage band is larger than the lowest band; while this recognizes the value of just “getting started,” the highest level (approaching 100%) is the most difficult to achieve.

I'd also introduce a credit for employee (faculty and staff) sustainability training. I'd like to say something like: “sustainability training for all employees—lectures, literature, and workshops--equivalent to the level of diversity training” but I don't believe that would be politic. The credit could be scaled for the percentage who participate in such programs. Perhaps it should be two separate measures for faculty and staff because the former may be more difficult to engage.

Respondent K

YES. Sustainability has a broad definition but it does define continuity. EH&S, Interns & clerical workers should count as staff. Percentage should not matter as long there is one for it will grow if given the proper liftoff.

Respondent J

No. It would be better to rate on the accomplishments of the campus, than the number of people involved. Certainly more people can mean more gets done, but why should a small school get penalized for fewer people if they accomplish as many outcomes?

Respondent I

We are struggling with this a bit ourselves

FUNDING

1. GF6: Is a reinvestment mechanism only valuable for the funding it provides or are there other important benefits of having such a mechanism in place? What are the other benefits?

Respondent B

It's an incentive to do work differently to free up dollars for reinvestment. It provides an option to do things without having to repurpose funds from some other place. Most of us are working in a zero sum environment so it provides a mechanism to move forward.

Respondent K

Sustainability

Respondent F

It should be possible to leave it up to the institution how they will fund, but should not be on the backs of the lower income staff and students at the school (ie such as raising tuition or cutting salaries, benefits).

Respondent J

It illustrates a commitment to the process and projects and is a reminder that this is important enough to continue investing in. It can also help develop programs more quickly and encourage new ideas

Respondent I

Social screens (KLD and Social Screening service) suggest a larger and deeper commitment than just operational funding. Other benefits-long term investments based on social justice

2. GF7: What are the distinct types of "dedicated sustainability funding" that an institution can provide? Are some types more important than others (e.g., more secure source; higher growth potential; bigger impact)? Should we only give a credit to a particular type of dedicated funding, or should we offer additional credit opportunities for each type of funding?

Respondent B

Not sure what you mean by this.

Respondent C

I'd propose a measure that requires a formal policy encouraging or requiring investing in sustainability and captures sustainability funding as a percentage of the operating budget rather than "dedicated funding." Others could supply appropriate percentage breaks for the latter better than I.

Respondent K

Foundation funding by givers selection.

Respondent J

Offer a credit wherever such funding exists. If it's only for energy projects or only for research it's still \$\$\$ that isn't being used to put new carpeting in all the residence halls.

Respondent I

Opportunities for each funding- could be grants that can be tapped into at college or unit level

3. Are there any other credits related to sustainability funding that should be considered for inclusion in STARS? Please be as specific as possible – write out the criteria if you can.

INVESTMENT

1. Should we cover university investables, foundation investables, or both? What if a campus is transparent about one but not the other?

Respondent B

Should be noted that Foundations are separate organizations generally governed by separate boards. The institution doesn't always have control over the actions of a Foundation. I don't think you want to penalize the institution as it may result in them withdrawing.

Respondent C

Any funds controlled by the university or where it has a majority voice in investment decisions.

Respondent K

No, for you will lose strong institutions based on lawyer arguments

Respondent F

Great idea to use whatever criteria is currently used to define Socially Responsible Investing as part of the ranking system. If they do not have control, they should begin steps to take control and educate the school community on the importance of responsible investing. (pt 2 below)

2. Are there certain types of institutions that don't have any endowments or don't have control over them? (Give examples.) How should STARS take account of this?

Respondent B

Many Foundations give their money to other entities to manage the funds e.g. Common Fund. It's not that you can't influence but you don't necessarily have direct control. Similarly, some states require colleges to invest through a state pool that is run by a state Investment Council. The institution has very little control.

3. GF8: What asset classes should we require institutions to be transparent about? (e.g., private equities, public equities, real estate, hedge funds, etc.)

Respondent C

Any funds controlled by the university or where it has a majority voice in investment decisions.

4. GF8: What groups should have access to investment data?

Respondent C

Disclosure should be public, which means anyone.

Respondent F

The entire institution community (staff, faculty, students) at least. Possibly also AASHE./ whatever body needs access to assess sustainability criteria.

5. GF8: What is the appropriate time lag to allow in disclosing investment information?

Respondent F

3 months. In general, the longer you offer someone to provide a response, the longer they will take. At most, a year should be given seeing as rating systems seem to be reviewed annually.

6. GF9: How much should we specify about the composition of the committee on shareholder responsibility?

Respondent C

As stated is fine.

7. GF10: Should we establish a minimum percentage? If so, can we define "endowment" clearly so that schools will know the total figure that we want to take the percentage of?

Respondent C

Use the endowment reported to NACUBO or US News.

8. Should we elevate the credit about retirement plans having an SRI option from Tier 2 to Tier 1? Explain why or why not.

Respondent C

Yes. It's a huge allocation of financial resources with profound sustainability implications. Credit wording: Does institution offer sustainability-oriented funds in its retirement options?

Respondent L

Yes, there should also be an option for retirement monies, which for some institutions may be larger than their endowment.

9. Should we add a new credit for introducing shareholder resolutions that are supportive of sustainability?

Respondent C

No. It would be difficult to measure and irrelevant to many institutions.

Respondent F

Yes – brings transparency to it.

Respondent G

Getting Trustees involved is important. This is a good way to get them involved.

Respondent L

As for credit for introducing shareholder resolutions, I think there should be one, regardless of the resolution as it depicts involvement with their investments beyond simple financial return and thus should be celebrated.

10. Are there any other credits related to investment that should be considered for inclusion in STARS? Please be as specific as possible – write out the criteria if you can.

Social Responsibility and Community Engagement

1. Should we create a credit (or multiple credits) for "engaged scholarship"? How would such a credit be defined? Are there specific actions an institution can take to encourage and support engaged scholarship?

Respondent B

Has promise but I don't know how you'd measure it.

Respondent C

No. We'll have challenge enough dealing with sustainability-oriented research.

Respondent I

Yes- might look at my university's Scholarship in Action as a start to the engaged scholarship piece – Chancellor's inaugural speech

2. Should we create a credit (or multiple credits) for "campus partnerships with local/state/national government, local businesses, and K-12 institutions"? If so, how should we define the credit to ensure that such partnerships are meaningful and significant?

Respondent B

Yes.

Respondent K

YES

Respondent F

Possibly according to # of person hours spent in collaboration with the partner? Also could take into account any reports/ docs generated.

Respondent I

Yes- this is the economy, social justice and environmental piece

3. Should we create a credit for having an on-campus child care facility? Does this make sense for urban institutions with nearby child care facilities? How would the credit be written to account for this?

Respondent B

Yes.

Respondent K

This is a great idea but politics and personal needs should be left at the door.

Respondent F

Yes. It makes a huge difference to parents to have their children nearby. For my institution there are virtually no childcare facilities near to the campus which is not far from downtown. My institution has a childcare facility as there was such a high demand for it. The childcare facility is LEED certified. Perhaps extra credit could be given for 'green' facilities? (not that I'm fishing for points here!!!)

Respondent G

I would stay away from the child care facility being included in this. Some institutions simply cannot do this and some will not need to due to existing arrangements.

Respondent J

Although I think this is a good idea, I can tell you that our campus has an excellent day care facility that isn't open whenever the campus is closed – or all summer. I don't see it as worth points unless it is truly useful to full time employees.

Respondent I

This is such a heavy burden on most families and most institutions because of how much they need to be subsidized in order to meet state codes.

I oversee that area on my campus, I don't think I would include this

4. [Should we create a credit for debt forgiveness for students who go into public service and/or other incentives to promote or support public service by graduates? How should the credit be written?](#)

Respondent B

Possibly.

Respondent K

Politics again, this again is off the track and diverts dollars and time from the central object.

Respondent F

Yes! Great idea! However, it would have to be written in such a way that students would not set themselves up to have their debt forgiven. It would have to take into account the length of time they spend in public service. A review committee could review the work they do to assess it's benefit to society in general

Respondent I

Not sure- part of it depends on the infrastructure and how close your school is connected to Peace Corps, Ameri Corps and Teach for America among other programs

5. [Should "compliance with labor laws" be added as a prerequisite, similar to how compliance with environmental, health, and safety laws is a prerequisite in the Operations category?](#)

Respondent B

Why give points for something that the law requires you to do?

Respondent K

Again, we are losing track and getting political. This is the wrong venue for this program. One cannot be everything to everybody.

Respondent F

Yes. That is the bare minimum. A school cannot declare itself to be 'sustainable' if it is repeatedly hiring white males for the majority of high paying jobs, for example.

Respondent G

I believe that compliance with all laws should be a requirement of the program.

Respondent I

Yes

SERVICE

1. SC2: Should we restructure this credit to take into account the number of hours students are engaged in community service? If so, is sufficient data available about average hours of community service per student per semester (or quarter) to establish reasonable and fair thresholds for achieving each point?

Respondent B

These data should be available.

Respondent C

Such data are unlikely to be available, so don't restructure. I would, however, try to capture sustainability outreach specifically. One means would be to have a credit following SC 1 such as: Community service program specifically encourages and facilitates sustainability projects.

Respondent K

Yes

Respondent M

Accurately documenting community service hours is difficult and does not seem to distinguish between curricular service (e.g., service-learning), co-curricular service (e.g., service requirement of athletic teams or student orgs), and community restitution hours. It's possible that sufficient data exists to compare curricular service hours across some institutions, but not all. Perhaps identifying the existence of programs in these areas would be sufficient for the credit. Another indication may be the presence of community service scholarships or other incentive programs. **Curricular and co-curricular service programs/opportunities are institutionally supported and available to all students each term.**

Respondent I

Yes if the organization is connected to the larger community conversation numbers are closely tracked

2. SC3: Is having community service written into faculty and staff job descriptions the best way to address faculty and staff community service? Is there a better credit that might get at the desired outcome?

Respondent C

It's probably the best way; it's probably unlikely to occur. Released time, recognition in performance and tenure reviews will suffice here.

Respondent K

Yes

Respondent M

I'm not convinced that there is a better way, but perhaps the wording here is important; it doesn't seem that all institutions could easily require service of all personnel, but the requirement could be on Human Resources to incorporate service language into hiring and literature. **Community service is encouraged in all faculty and staff, opportunities are presented and support given for its completion, and community service is promoted through the orientation of all new hires and in employee literature (i.e, handbook).**

Respondent J

Here – and I would guess at many institutions - that would take many years to implement. It would need to go before the unions, the various councils, the administrators and the governing boards.

Respondent I

Not sure, written in as part of the promotion and tenure process will be the best motivator

3. [SC4+5: Is the percent of federal work study funds used for community service jobs an appropriate measure of an institution's commitment to community service?](#)

Respondent B

No. Some colleges provide institutional funds for student workers.

Respondent C

This is much easier for urban than rural institutions. I'd vote for "institution encourages and facilitates use of WS funds for community service."

Respondent K

No

Respondent G

No, Service learning should be more than just the FWS required hours.

Respondent M

I don't think it is. Here location and size of institutions make this kind of commitment difficult to address. Lowering the percentage may be good (10 or 15 rather than 25, e.g.), but some institutions may simply be unable to increase community service work-study positions.

Respondent J

No. We use no federal work study funds for community service jobs – they can only use the funds for on-campus jobs. Our community service jobs are volunteer or paid by the organization.

4. Should we create a credit (or multiple credits) for "service learning"? If so, should it be in the Social Responsibility and Community Engagement category, or the Education and Research category? How could such a credit be worded?

Respondent B

Possibly.

Respondent C

No.

Respondent M

Yes. And the service-learning credit should be in Social Responsibility and Community Engagement section; offering service-learning courses reveals a community engagement and Ed. & Research section rightly focuses on sustainability-specific offerings. The criteria could include a percentage of faculty involved in s-l courses, the percentage of depts/programs offering s-l, etc. **The institution supports service-learning, denotes service-learning course offerings in registration materials, and service-learning courses are tracked to assess impact on community and student learning.**

Respondent I

Not sure how to do this besides on the amount of hours vs the quality of the experience of both the wisdom makers and the knowledge makers

5. Should we create a credit for campuses that have received the Carnegie Foundation's "Curricular Engagement" and "Outreach & Partnerships" classifications"? (See <http://www.carnegiefoundation.org/classifications/index.asp?key=1213>)

Respondent B

Assume this applies to four year schools??

Respondent K

Yes

Respondent M

I think this could be rightly offered as a Tier Two credit, but not Tier One. Additionally, it's an elective classification and can be voluntarily applied by the institution itself.

Respondent I

Yes- that is a process that should be embraced- many of the other things that you are potentially asking for are part of that process

6. Are there any other credits related to service that should be considered for inclusion in STARS? Please be as specific as possible – write out the criteria if you can.

Respondent C

I'd propose a credit for a community-oriented institutional outreach program in sustainability (e.g., lectures and workshops to which the public is explicitly invited, energy audits, model

building tours, faculty consulting). I'd do another for percentage of faculty and staff who are involved in community-oriented sustainability activities.

Respondent M

A Tier One credit that recognizes community outreach that specifically addresses environmental sustainability would be valuable. This could perhaps recognize ecological restoration work, environmental education outreach, or general conservation and awareness and/or capacity building activities. It could also recognize the influence of local communities on the environmental sustainability of the institution. **Outreach activities and partnerships increase awareness or capacity for addressing environmental sustainability issues in the local community.**

DIVERSITY

1. SC6: Should we be more flexible about the exact form a diversity body takes, or should we be more specific about the composition of the body, how frequently it should meet, and who it reports to?

Respondent B

Again, don't get prescriptive on this. You might cause colleges to spend more time revamping governance processes and creating new groups that actually getting the work done.

Respondent C

Be flexible in the definition. Combine 6 and 7 (one without the other is inevitably handicapped).

Respondent K

Diversity is important but having strong participation to achieve the mission should be the criteria of the program.

2. SC7: Is it reasonable to expect schools of all types and sizes to hire a full-time diversity officer? If not, should we set a lower threshold for schools where it is an unreasonable expectation, or is there an alternative diversity staffing criteria we can apply to such institutions? How should we differentiate between the types of institutions for which a full-time diversity officer is a reasonable expectation and those for which it is not?

Respondent B

It is not reasonable to expect this. Some community colleges are tiny and simply can't do it. Also, some places have a distributed structure.

Respondent F

It is not reasonable to expect smaller schools to have a FTDO.

Respondent G

It is not reasonable to expect that smaller colleges will have a full time diversity officer. Part time should be enough.

Respondent I

Not sure – this is a chicken and egg question, if diversity one person's job or every body's job?

3. SC8: Are there more specific practices to promote diversity through admissions that should be added as criteria for achieving this credit?

Respondent C

No.

Respondent I

this would be very difficult to measure given the Michigan cases from a few years ago and the Ohio cases from this past year

4. SC10-13: Are there better ways to measure diversity of a population than just an increasing percentage over time of underrepresented groups? Are trends in diversity among faculty and administrators the best way to give credit for diversity? Should we instead make a threshold of diversity that campuses should exceed to get a point? This threshold could be tied to the diversity of the surrounding community (perhaps 25% more than the community).

Respondent C

The referent should be the population from which the institutions draws its students, which may be local, state, regional, or national. Diversity is not the same as social mobility. The former should reflect the population from which the institutions draws; the latter may involve disproportional representation of the disadvantaged. The best measure of effective diversity is minimal deviation from the relevant population figure—a computational swamp. The problem is compounded by the existence of multiple racial/ethnic groups that may be represented differently within an institution. I believe the best we can do, however, is to ask about the percentage of underrepresented populations enrolled (based on the institution's definition of its market), use total aggregation of the relevant underrepresented groups (as identified by the institution), and give points for proximity to the population proportions—60-69% (1 pt), 70-79% (2 pts), etc.

Respondent J

Tough question. Our experience has been to heavily recruit as diverse a student and employee group as possible. Unfortunately, here it really is the great white north and we lose underrepresented group members at an astonishing rate because they feel very uncomfortable and out of touch with "the real world".

Respondent I

Again –tough one, difficult to measure the quality of the diversity experiences vs. the ethnic and cultural differences

5. SC15: Should the non-discrimination statement be a prerequisite rather than a credit?

Respondent C

Yes.

Respondent I

no

6. Are there any other credits related to diversity that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent E

It is fairly common at publicly funded institutions to include diversity criteria in the criteria for the selection of consultants. Specifically in the selection of Architectural teams for construction projects, but that can be expanded to include other/all consultants. It may be worthwhile to include a trend-based goal or even a strategy-goal that requires a minimum portion of a consultant's team is comprised of minority participation.

Respondent I

disability

FAIR LABOR PRACTICES

1. SC22: Is providing health care to all employees who work more than 50 percent FTE an unreasonable standard to require for this credit? If so, what would be more reasonable?

Respondent B

We do this but the health care situation in the US is a national scandal that businesses and colleges are left to deal with. Given the disinvestment in higher education it is setting a standard that many colleges won't be able to meet.

Respondent F

Yes, absolutely reasonable and should be there.

Respondent G

This would apply a burden to some institutions. 75% FTE would be more reasonable.

Respondent I

Gosh- I hope we are past this on most of our campuses.. Yes it should be considered

2. SC24: How can pay equity ("equal pay for equal work") be measured? Is it already being measured by a higher education organization or by human resource departments on campus? Or, if pay equity can't easily be measured, are there policies/programs that are indicative of an institution that is committed to pay equity?

Respondent B

Having compensation schedules that apply to all gets at this as opposed to the Dean or some administrator deciding. However, sometimes flexibility is needed depending on the discipline and research agenda.

Respondent C

Robert Toutkoushian at the University of Indiana (editor of New Directions in Institutional Research) has done a great deal of writing and consulting on this front; ask him.

Respondent F

Lot of gender inequality at faculty, staff levels---schools should have to supply data that is compared with some national, international norms.

3. Are there any other credits related to fair labor practices that should be considered for inclusion in STARS? Please be as specific as possible.

AFFORDABILITY AND SOCIAL MOBILITY

1. How should an institution's contribution to social mobility be measured and recognized in STARS? Is percentage of students who receive Pell Grants a good indicator of how the institution contributes to social mobility? Please be as specific as possible.

Respondent C

I believe it is arguable that social mobility is a sustainability issue. Affordability and access, on the other hand, are definitely required for sustainability. I believe that a definition similar to diversity should be applied here—percentage of low income students in the student body compared to the low-income percentage in an institution's market (or Pell Grant recipients).

If an institution meets full need of all students according to the Uniform Methodology, Credit 27 should be given for a 1:1 ratio.

Education & Research

1. ER-Prereq1: Should "a methodology for classifying courses and research as 'sustainability focused'" continue to be a prerequisite for the Education & Research section? Alternatively, should it be incorporated into the relevant credits or added as a separate credit?

Respondent K

YES

2. ER-Prereq1: Should the sustainability classification methodology be defined by each institution, or should STARS provide a standard methodology? If institutions are allowed to define their own criteria for classifying courses and research, can the results be comparable? Do you have any suggestions for what the criteria should be for classifying a course as "sustainability-focused"? What do you think about using the following criterion for a "sustainability-focused course": "Sustainability concepts are incorporated into the course description or objectives, and appear on the syllabus."

Respondent C

How about including a list of sustainability issues such as: social inequalities, economic inequalities, ecological degradation, use of exhaustible resources, et cetera, and saying that a course must address one of more of these? And a requirement that the course specifically address trends and projections, along with options for remedial action?

Respondent K

Defined by the institution and its leadership. In the end, results are what counts.

Respondent G

This is a good statement and sufficient.

Respondent J

It would help to know which definition of Sustainability is being used as a baseline.

Respondent N

Regarding the methodology for determining if a course is sustainability-focused, I believe we should offer a few examples of methods or frameworks to determine if a course is sustainability focused. Schools could adapt on of ours, or create their own, but it's always nice to have a couple of models. I very much like Geoff Chase and Peggy Barlett's ideas about multiple ways of incorporating sustainability into the curriculum- I would recommend their general approach as one of our suggestions.

As an example--I considered my perspective on their approach (I would recommend getting input from them is you wanted to use this) but here is a stab at how we might apply ratings. As a social psychologist who teaches social psychology, environmental psychology and research methods, I could incorporate sustainability into my teaching in several ways. Examples are:

I might create a new course, e.g., the Psychology of Sustainability (4 points)

I might create a new unit within an existing course. For example, I might spend three weeks looking at the social psychology of sustainability within my Social Psychology course. (3 points)

I might create a major assignment within a course, e.g., I could have my students write a proposal for an experiment related to sustainability in my Social Psychology or Environmental Psychology course. (2 points)

I might use sustainability themes or examples in an existing course, e.g., if teaching a Research Methods course, I might use examples of research with a sustainability component. E.g., when talking about field research, I might use Cialdini's study on littering in public places. When talking about experimental research, I might use Sadalla and Krull's work on perceptions of those who engage in sustainable behaviors. (1 point)

While the first three would be easy for an institution to quantify if it wished (a faculty member could produce a syllabus or assignment), the fourth is the most "slippery" to quantify—how many examples are needed or how explicitly and consistently must the theme be expressed for the course to count as a sustainability focused.

CURRICULUM

1. **ER2: Is there some percentage of courses that are sustainability-focused past which it is unreasonable to expect a continued upward trend, even at the "fully sustainable" institution of the future? If so, what is this percentage?**

Respondent C

There has to be a cap—math, art, music, physics, ancient history, et cetera will have a difficult time incorporating sustainability issues into their courses. Any cap will be arbitrary. Peggy Bartlett at Emory might offer some guidance.

Respondent H

I think it all depends upon what you mean by “sustainability-focused”. If it requires using it as the major theme for the course or having a “unit” on sustainability, I think that the percentage will remain rather low. The current discipline-focused structure of universities and the limited number of faculty capable of teaching sustainability will limit this. If, instead, it is a concept that is occasionally considered (through a case study, a specific experiment, etc) I think that the number would be much higher (at least 50%).

2. ER3: Is it possible to obtain information on the percentage of students enrolled in one or more sustainability-focused courses in a given year (assuming the courses were clearly identified)?

Respondent B

Should be possible but I don't know how much work it would be.

Respondent C

Not difficult, “assuming the courses were clearly identified,” which is the critical element.

Respondent K

Most likely

Respondent G

For institutions that have more than one campus, the numbers on a given campus would need to be used for this comparison.

3. ER4: Are there specific sustainability course development incentives (including those listed) that should be required to earn this credit? Are there other criteria that should be required to earn this credit?

Respondent N

To help faculty incorporate sustainability, institutions could offer:
faculty curriculum workshops
technical assistance or advice from faculty development and sustainability specialists
peer to peer brownbags and discussion groups
summer institutes

Faculty incentives for development could include:
stipends
summer funding
release from courses
provision of teaching assistants

4. ER5: Should a list of sustainability-focused courses be sufficient to earn this credit? If so, does it matter where the list is housed and whether it is official or not? How would you word this indicator to include the option of having a list and ensure that outcomes are roughly equal?

Respondent B

Yes.

Respondent C

Give one point for an informal list and two points for an official list. The present wording is sufficient.

Respondent K

YES

Respondent H

I would say that having a way to classify courses and a list is a great thing and should earn a credit. I think that getting this into the catalogue is even tougher and should be worth another point.

5. ER6: Should we modify this credit to ask what percentage of departments offer sustainability-focused degrees, minors, concentrations, or certificates, and convert it to an "intensity" question with more points for higher percentages? Is there a better way to get at the goal of recognizing sustainability-focused programs?

Respondent B

No.

Respondent C

Current formulation, plus the percentage of departments.

Respondent K

Yes

6. ER6: Is the definition of what constitutes an "academic department" clear and comparable across campuses? Are there any other entities besides academic departments that offer courses or degrees?

Respondent B

No.

Respondent C

Reasonably clear, although I'd add "or department equivalent such as a program." There are other entities that offer courses, but they are likely to be insignificant.

Respondent K

YES

7. ER7: Should we split this credit into two points – one focused on hiring, and another on tenure and promotion? If so, what should the criteria be for receiving credit for sustainability hiring? Should the tenure and promotion section be changed to require that inter-disciplinary work be recognized in tenure and promotion decisions? What policies/programs should be in place to ensure that inter-disciplinary work is recognized? Should this entire credit be eliminated as it could be seen by some as a foul of academic freedom?

Respondent B

May not apply to community colleges.

Respondent C

No. Just focusing on interdisciplinary research doesn't make sense; they could be art and music or linguistics and history without a sustainability component. This credit shouldn't be eliminated.

8. Should we add a credit based on the percentage of academic departments that offer at least one sustainability-focused course (measuring breadth)?

Respondent B

Academic departments are defined differently so it's hard to do this.

Respondent C

Yes, although this could hurt institutions that are disproportionately humanities oriented.

Respondent K

Yes

Respondent H

Yes. I think this is critical to ensure that it's not just something that lives in the philosophy/ethics dept or environmental science dept but is across campus.

9. Should we create a credit based on the percentage of departments (and/or programs?) that have adopted a sustainability education plan?

Respondent B

No.

Respondent C

No.

Respondent H

Yes. I think this is critical to ensure that it's not just something that lives in the philosophy/ethics dept or environmental science dept but is across campus.

10. Should we add a credit for sustainability learning communities? If so, how should we define "sustainability learning community" to ensure that these communities are meaningful and significant?

Respondent B

Possibly.

Respondent C

NO. I prefer the Informal Education Credit on sustainability themed-living opportunities described below.

Respondent K

Yes

Respondent H

I think it's great to add it. If you add it, I think you need to define what it is.

11. Should we add a credit for sustainability-focused study abroad programs? If so, how should we define this credit to ensure that these programs are meaningful and significant?

Respondent C

Yes, in Phase 2 of STARS. Get some examples of such programs as models for framing the spex.

Respondent K

Yes

Respondent H

I think it's great to add it. If you add it, I think you need to define what it is.

12. Are there any other credits related to curriculum that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent K

Internship at other outside organizations or agencies

RESEARCH CONTENT

Respondent B

Assume that this won't apply to community colleges and that they will not be penalized because they have a different mission

Respondent H

I think that the issues raised here (definition, incentives, etc) are analogous to the issues in the above section on curriculum. I would urge that these sections should be as organized in the same way.

1. What criteria should be used to classify a research as "sustainability-focused"?

Respondent K

Something that will last for continuous period

Respondent N

I think we will have to define or ask them to define "sustainability-focused research."

2. ER8+9: Is there some percentage of research dollars going to sustainability past which it is unreasonable to expect a continued upward trend? If so, what is this percentage?
3. ER10: How should we modify this credit to give recognition to those schools that have multiple sustainability-focused research centers, and to take into account different orientations to research? Should we ask about the percentage of research centers that are sustainability-focused?

Respondent C

At least one is sufficient. Don't ask about percentages because it depends on the substantive mix of a campus's research centers.

4. ER11: Are there specific sustainability research incentives (including any of those listed) that should be required to earn this credit? Are there other options that are roughly equivalent and should be listed?
5. Should we create a new credit about undergraduate sustainability research opportunities, or can undergraduate opportunities be incorporated into the other research credits? (ER8, 9, 10, 11)

Respondent C

I'd separate them, perhaps up to 50% as top level (arbitrary, to be sure).

Respondent K

Yes

6. Should we create a credit for "participatory action research"? If so, what should be required in order to receive this credit?

Respondent K

Yes

7. Are there any other credits related to sustainability research that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent K

Senior Engineering Projects

INFORMAL EDUCATION

1. ER12: Is having a sustainability student group sufficiently important to merit a full-point, or should it be moved to Tier2?

Respondent B

Students are what we are about – if we engage them it should be worth something.

Respondent K

Yes

2. ER13: How should we define "sustainability outreach program" to ensure that such programs are meaningful and significant? What criteria should be required to earn this credit?

Respondent C

I believe that institutional outreach is more than students (see above "Service and Outreach").

Respondent K

Involves the entire university community sectors

Respondent F

Evidence of program – for example, I give a Sustainability 101 talk to departments and university groups on request, and I ask all attendees to sign in. This provides a record of how many people we have provided outreach to. Also, photos of events, website links.

3. Should we create a credit for faculty and/or staff "sustainability outreach programs"? If so, how should we define "outreach programs" to ensure that these credits would be meaningful and significant? How would you write this indicator?

Respondent C

See above.

Respondent K

YES

Respondent F

Yes, I think so. it ultimately results in people changing their behaviour. Programs should be reviewed every year for up to date material. Records of # of people receiving this education should be kept.

4. Should we create credits for faculty and/or staff "lifetime learning or training in sustainability"? If so, how should we define "lifetime learning" to ensure that these credits would be meaningful and significant? How would you write this indicator?
5. Should we create a credit for sustainability themed-living opportunities? If so, how should we define "sustainability themed-living opportunities" to ensure that this credit is meaningful and significant? How would you write this indicator?

Respondent C

Yes. Residential opportunities that focus on sustainability issues—places where programming and practice specifically promote sustainable living and attention to sustainability issues.

Respondent F

Yes. Green building/ LEED certification of bldgs or dorms managed by a university entity.

6. Should we create a credit for having an "active outdoors program"? If so, how should we define "outdoors program" to ensure that the credit is meaningful and significant? How would you write this indicator?

Respondent C

No. The sustainability education component in these can be minimal. Just enjoying the outdoors isn't sufficient inspiration (I worked at a school with the oldest and one of largest of these programs.)

7. Should we create a credit for "using the campus as a laboratory for teaching sustainability"? If so, what practices should be required in order to receive this credit? How would you write this indicator?

Respondent B

Yes.

Respondent C

No.

Respondent K

Yes

8. Are there any other credits related to co-curricular and informal education that should be considered for inclusion in STARS? Please be as specific as possible – write out the criteria if you can.

LITERACY

1. Is it appropriate to encourage sustainability literacy testing? Are there any other ways to quantitatively measure the success of sustainability education?

Respondent C

Yes. Give a point for having it as a formal goal, another point for assessing the state of such literacy. Ask Peggy Bartlett, Emory.

Respondent K

Yes

2. How should sustainability literacy be measured? Are you aware of any existing assessment instruments?

Respondent C

Ask Peggy Bartlett, Emory.

Respondent K

By a physical successful project

Operations

1. OP Prereq1: Do we need to further define "facilities" and "materials that are collected within the local jurisdiction"? If so, how?

Respondent A

No.

Respondent C

I'd say "used on campus and in facilities owned or operated by the college or university" (I'd avoid the exclusive term "university" because colleges are proud of being colleges.)

Respondent O

The term facilities should be up to the institution to determine if they want to submit this for one campus, multiple campuses or the entire University System. For materials collected, I suggest you use a similar grouping as used in the C2E2 Tracking tool.

Respondent E

Definitions are probably adequately clear. Consider using the term "waste streams" in lieu of materials. It may be necessary to exclude construction and demolition waste from this credit (for clarity) and to cover concepts of construction waste management elsewhere.

2. OP Prereq1: Should we require any additional criteria to meet this prerequisite?
3. OP Prereq 2: Is requiring compliance with EH&S regulations the best way to highlight the importance of compliance as a foundation for sustainability efforts and to get at the concept that sustainability should be "beyond compliance"? Is just having dedicated EH&S staff and programs to ensure environmental compliance sufficient, or could it still result in the embarrassing situation of awarding a sustainability rating to a campus in serious violation of EH&S regulations?

Respondent A

Any government cited violation must be considered a serious violation; conversely government action is the only way to assess compliance is to review the government's findings and citations. Government citations expire in a surprisingly short time (about 3 years).

Respondent C

How about "must be in compliance or implementing a compliance plan approved by an appropriate authority"?

Respondent K

Yes, requiring compliance with EH&S regulations the best way. Has to be broader and incorporate energy and water management.

Respondent O

I suggest we have the requirement to have a "compliance program" for all applicable EHS regulations (State & Federal). As part of this compliance program they must self-asses/audit regularly and have a corrective program in place to correct problems.

Respondent E

I think requiring compliance as a pre-requisite is a good idea. This reminds me of LEED that requires as a pre-requisite meeting the current energy code, and additional points are earned when results that go beyond compliance are met.

Respondent F

Compliance is necessary with EHS regulations. It is possible to require a verification step with local and State authorities, to ensure compliance is in place. Sustainability is beyond compliance; it is leadership based, and proactive rather than reactive. Most legislation is reactive (eg the Oil Pollution act was passed in response to the Exxon Valdez, even though this regulation had been sitting around gathering dust since 1974 in Washington DC, on the desks of politicians too lazy to be proactive.)

4. OP Prereq 2: Can do we define "compliance" in a such a way that doesn't penalize those that are making a good faith effort to comply with EH&S regulations and occasionally have a minor violation but that does exclude a campus that is in serious violation from achieving a rating under STARS?

Respondent A

No. The distinctions are legalistic not practical.

Respondent O

See above #3

Respondent F

Again I think third party information from local and state authorities would be valuable here. We could request a letter of compliance from relevant authorities (eg NFPA, regional EPA, state EPA, city officials) as part of the submission requirements for STARS rating. Or at the very least contact information for university liaisons in those offices. If a university has to supply the contact info, the 'threat' is there that AASHE may contact that office, and potentially unearth a violation.

5. OP Prereq 2: With which regulations specifically should we require compliance?

Respondent A

All federal and state regulations. Local land use requirements are interesting but generally do not result in findings of violations.

Respondent O

See above #3

Respondent E

EPA

Respondent F

Hazardous waste (RCRA) should be one of the basic ones. Every university with teaching labs will have to get rid of haz waste. Also, sanitary sewer regulations (usually city based), stormwater (NPDES – EPA), oil handling (SPCC – EPA), radiation waste, biowaste, air pollution regulations. OSHA regulations should also apply. State organizations are not obliged to have inspections by OSHA, so this can allow for non compliance to happen. State schools may find this one hard.

6. Are there any other credits related to EH&S that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent A

Documented pollution prevention program, particularly when recognized by state government technical assistance programs.

Respondent O

I suggest that you examine the C2E2 tracking tool for other environmental media that could be considered in STARS.

Respondent F

If the school has received awards for environmental / health and safety performance, this could be taken into account.

PLANNING AND DEVELOPMENT

1. **OP2-4: Are policies requiring LEED-equivalent standards sufficient, or should the policies require actual certification? Do any campuses have policies requiring actual certification for every new building?**

Respondent A

Yes and yes.

Respondent B

No, it shouldn't require actual certification. Again, we want the result of meeting the standards, the certification is less important.

Respondent C

I'd give one point for LEED-equivalent and two for certified.

Respondent K

Require certification and not sole source to LEED but also Green Globe Program and Energy Star ratings

Respondent P

I am sure there are more campuses that have policies requiring certification but I know off the top of my head that University of Florida and University of California Merced require LEED Silver certification for all of their new construction. There is new data that shows that buildings that are certified consistently deliver significant energy savings over buildings that are not certified. I am happy to share that study. The paper and summary will be ready in December. Anecdotally, building to LEED equivalent standards does not produce the same results as requiring certification. Unfortunately, not having a third party check on the work results in a building that is not equivalent in performance. The cost of certifying a building is minimal compared to the total cost of the project. However, consultant fees can often be significant. This means that as a campus develops expertise in building to LEED standards the costs will come down. We are working on ways to streamline the process and cut costs for all involved.

Respondent E

I feel strongly that actual third-party certification should be required. This does not refer to LEED exclusively, since other programs that can provide 3rd party certification are out there, such as GreenGlobes (which in my opinion is not as strong as LEED). I do know there are campuses out

there that require LEED certification – Clemson University is one. Designing around the LEED system but not actually obtaining certification very often results in a less stringent enforcement of sustainability goals. If project teams are not measuring a project's environmental footprint then goals are often not met; and if teams are measuring these things then the costs for 3-rd party certification is minimal (much of the cost of LEED is the cost of asking designers to measure things like energy and water performance, % of materials that are “green”, room daylighting factors, etc... Without measuring it, you simply do not know what you have.)

Respondent F

Certification should not be required. LEED certification is prohibitively expensive in some cases (1% of the cost of the building!!!). this means that a \$300 million building will cost \$3M to certify. Adoption of LEED standards into the design standards by a campus should suffice, but documentary evidence should be provided to verify this. The LEED rating sheet can be submitted as evidence that the building is green built. Records to verify the design could also be supplied (photos/ correspondence, et c).

2. OP4: Would you support reformulating this credit to an upward trend in percentage of building square footage that has actually achieved LEED certification of any kind except LEED-EB (which is covered OP3 and is a reoccurring standard rather than a one-time certification like the others)?

Respondent P

I think this is a good idea because many campuses are using LEED for Commercial Interiors to renovate either office or classroom space rather than renovating the entire building at once.

Respondent E

I would be concerned that an upward trend is not aggressive enough, and certainly not as strong as a policy that requires LEED Silver for all future projects. I do not feel like a LEED requirement policy is too severe a requirement.

3. Can you suggest a credit that would recognize adaptive reuse of buildings?

Respondent C

Great idea. I'm not the one to provide wording.

Respondent K

Ability to do Federal Classified Historical Buildings

Respondent E

A simpler metric might be a credit that discourages the demolition of buildings. Perhaps a trend-based credit where the ratio of the number of buildings that were renovated/reused over the number of buildings that were demolished, increases over a three-year period. Or perhaps a strategy-based credit that requires a feasibility study that examines the potential for the reuse of any building that is slated to be demolished.

4. We'd like to add a credit on Indoor Environmental Quality. What are the most important elements of a IEQ program? Can they be measured in a way that would allow for reasonable comparisons across campuses and wouldn't be unduly burdensome to carry out?

Respondent A

IEQ is driven by Indoor Air Quality. Documentation of an established indoor air quality would be an important sign of a significant (i.e. greater than zero) commitment to this issue.

Respondent K

Quality of working conditions –NOT the number of air changes which in fact can be climatic. Yes with proper sensing and data collection with the campus Building Management System.

Respondent E

The big components of an IEQ program should touch on adequate ventilation rates, control of harmful indoor pollutants (like VOC's), and daylighting requirements. Of these, the indoor pollutant control is the easiest to carry out: simply by a strategy-based credit like "adopt the South Coast Air Quality Management District (SCAQMD) Rule #1168, the Green Seal Standard for Commercial Adhesives, and Green Seal Standards for all paints, sealants, and adhesives"

A "no-smoking except in designated areas" policy might be a good one to include.

Daylighting considerations are important but harder to create goals. For instance if one were to integrate a requirements into the University design guidelines that provides a minimum daylight factor for classroom and office spaces, that might be burdensome and impractical to achieve in some projects.

For ventilation rates (to ensure adequate ventilation is provided to occupied spaces), a start point would be to require all new projects be designed to meet ASHRAE 62. (this will ensure sound ventilation rates and design is followed. This is a pre-requisite to LEED so it may be implied if the University adopts LEED). This can be expanded by requiring that the ventilation rates prescribed by ASHRAE 62 are exceeded by at least 30%, or by requiring CO2 sensors to ensure adequate ventilation is being provided in all occupied spaces.

Another goal might be to commit to a policy where the facilities department conducts surveys of building users to determine their satisfaction with the indoor environment. This is the framework for LEED credit EQ 7.2, and should include the requirement to enact a plan to remedy comfort issues.

These last 3 suggestions really come from LEED. It is worth mentioning that by requiring projects to pursue a LEED rating, it does not ensure that any credit that is not a pre-requisite will actually be obtained, so there may be value in using LEED credits (or otherwise) as the basis of a policy, thus turning the most relevant ones into a pre-requisite.

Respondent F

Air quality, absence of mold, smells, VOCs. Also light quality. Daylighting.

5. [Are there any other credits related to planning and development that should be considered for inclusion in STARS? Please be as specific as possible.](#)

Respondent E

One that comes to mind is the requirement that the University monitor the energy and water use of all buildings within the campus. Metering of energy use should be specific enough to detect problems within specific systems. Metering of buildings provides information about building resource consumption which may help prioritize plans for system upgrades.

Perhaps it falls under Energy and Climate, but I would also require that all future design and construction projects incorporate building commissioning. Commissioning is a pre-requisite within the LEED program, so if LEED is required this may be redundant.

Respondent F

Sustainable development; remediation of a site/ parking area to return it to native landscaping/
build green building in place of blight site.

PURCHASING

1. OP5: Is a plan alone worth a point, or should points be reserved for demonstrated action? Is it possible to create standards for what such a plan would look like to ensure that it is effective?

Respondent K

Yes, a plan in the long run is worth more than an idea

Respondent F

It is possible to require a policy/ written procedure on how to review all purchases for environmental concerns/ energy efficiency issues prior to purchasing. This is standard with ISO 14001 (paragraph 4.4.6, Operational control). Evidence of training would indicate that purchasing officers have been made aware of sustainability issues when purchasing. A committed policy which requires that project managers consider HUB (historically underutilized businesses) can promote sustainable, local/ minority owned business contracts.

2. OP6: Is there a way to make this question apply for campuses with both centralized and decentralized procurement programs?

Respondent A

No.

Respondent K

YES

Respondent F

Yes. The language can indicate that it applies to all supplies purchased for use by the university, regardless of whether that function is contracted out or not.

Respondent J

There are computer programs that can be purchased to facilitate making de-centralized purchases within the guidelines that are in place. This would require an outlay of cash. But yes, the question can apply to both. FYI, we use both centralized and decentralized purchasing at our campus, depending on the \$\$\$ amount and type of product.

3. OP7: How should we define "local"?

Respondent A

It should be based on local government's program definitions.

Respondent Q

I think Local should be somewhere in a mileage approximation to one's facility. We currently use the state as the local boundary though the state agricultural department defines it as 20 miles. In a larger state, you could well be within the borders using 200 miles where in my case, I am into the next state or even further. The local piece supports the community and the wage earners as well as reduces a carbon footprint of a long haul product. The reason people are buying local plays into the answer as well. For us, local is a way of supporting the local economy, keeping the way it looks now – preserving a rural culture and understanding that local growers are more inclined to be a bit more quality conscious with the way pesticides are used and how they may effect runoff.

Respondent C

Within 100 miles.

Respondent K

Use the LEED definition of a 500 mile radius.

Respondent E

LEED defines "local" when it comes to building materials as within a 500 mile radius. I suspect this would be too large a radius with respect to food.

Respondent F

Could there be 3 tiers of 'Local' – within the city/ 100 mile radius; within the county; within the state. LEED has 2 tiers of 'local' in relation to sourcing building materials. Or Locally owned non-chain business patronage and local food purchase, certified food as you mention in 4 below are all good. Local is defined as within X miles—maybe 100 miles?

Respondent J

Use the Localvore description. I believe its 100 miles. LEED uses a more generous number which I believe is 500 miles

Respondent R

What about looking at if the university has come up with a priority system, based on where they are located. Areas to potentially include (from Uof C – Santa Cruz): organic & local, IPM local, conventional local, organic domestic, conventional national, imported?

4. OP7: What certification standards should count as "otherwise environmentally and socially preferable?" Are there any food "eco-labels" that explicitly shouldn't count?

Respondent Q

At this point, we are all using our best effort to define where these products come from and truth is a big part of that. There are low impact forms of growth such as integrated pest management that is not "certified organic". There is also those who lack the financial resources to pay for a certified stamp but may be growing better than an organic standard would suggest. Living wages and fair trade play into the conversation but from a skeptical point of view, I am not sure I trust some of that.

5. OP7: Should we modify the percentages of sustainable food purchasing necessary for each extra point? Note: there is already at least one campus that serves 100% organic food (Maharishi University of Management)

Respondent Q

We need to be careful of what we are labeling sustainable as some local purchases may fight against that measure. Percentages need to be obtainable and those that do serve close to 100% should be awarded for their good work.

Respondent C

Here's an example of the most difficult level to achieve getting the same points as the easiest level.

Respondent F

Yes – that is only fair. At our (large) university, we have almost 20 eating places on campus. They are mostly independently owned. It would be difficult to mandate 100% sustainable food purchases.

6. OP7: How should we define "food expenditures"?

Respondent Q

“That money which is spent on foods for your student body dining needs.”

Respondent C

I don't see why it needs more definition, but I also believe local non-food purchases should be recognized (although they are more difficult to measure; however, it's an important goal and institutions should get points when they do).

Respondent R

I agree with the edible food part, but also feel we should look at paper/grab-n-go items (paper goods) as there are many sustainable choices out there. Also, chemicals – both actual product and packaging.

How about defined as \$/meals served (not student body as it depends on how many people eat with you) .

7. OP7: What kind of documentation is reasonable to request from campuses claiming this point?

Respondent Q

Budget information would be earmarked as food expense. I don't believe anyone ducks any food for students under a paper line or other accounting point. To me, it is VERY self explanatory. Either you spend money on food or you spend it on other things. Perhaps there are those with just a generic budget but, I can't believe there are many in that boat.

Respondent C

Nowhere else is documentation required.

8. OP8: Are there any campuses that wouldn't get this point? Is it important to include anyway for its educational value?

Respondent C

I'd require that “each dining hall” offer the option at each meal.

9. Are there any other credits related to Dining Services that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent Q

If you donated your waste oil to a bio-diesel production for use on campus or the local area. Do you support and serve MSC approved fishing products? Should compost be mentioned here? Is there a subsidy to help obtain this ability or is it simply part of the regular food budget? (many have received grants or budget increases to accomplish this. Those who have worked within regular budget limitations should be given more credit than those who have had a monetary increase)

Respondent K

If they have a dedicated eatery for sustainability

Respondent E

Maybe it's covered elsewhere, but a strategy where food waste is composted, or a strategy where kitchen grease is incorporated into bio-diesel.

Respondent F

Use of biodegradable chemicals in cleaning; use of non disposable cutlery and delph.

10. OP9-12: Are these credits unfair to public institutions? Are there ways of making it fairer that don't compromise the integrity of the credit?

Respondent C

No. We are measuring impacts from the earth's perspective and shouldn't make allowances for benighted public policy.

Respondent K

No

11. OP9: We'd like to expand this credit to include other components of a successful green cleaning program. What are the most important elements of a green cleaning program? Can they be measured in a way that would allow for reasonable comparisons across campuses and wouldn't be unduly burdensome to carry out?

Respondent K

Using green products is the most important element

Respondent E

LEED offers innovation credits for commercial projects that implement a "green housekeeping program". The metrics of that credit are as follow:

"To receive an innovation point, the project team will need to demonstrate that a comprehensive green cleaning/housekeeping program is in place with clear performance goals, including:

1. A statement of purpose describing what the policy is trying to achieve from a health and environmental standpoint, focusing on cleaning chemicals and custodial training at a minimum.
2. A contractual or procedural requirement for operations staff to comply with the guidelines,

including a written program for training and implementation.

3. A clear set of acceptable performance level standards by which to measure progress or achievement, such as Green Seal standard GS-37 (see www.greenseal.org) or California Code of Regulations, Title 17 Section 94509, VOC standards for cleaning products (go to www.calregs.com, click on *California Code of Regulations* and perform a keyword search for 94509).

4. Documentation of the program's housekeeping policies and environmental cleaning solution specifications, including a list of approved and prohibited chemicals and practices. Demonstrate that the products used in the project are non-hazardous, have a low environmental impact, and meet the criteria set forth in #3 above. Concentrated cleaning products should be utilized when available."

This might provide a useful framework for goals.

Respondent F

Chemical use; storage and training of end users. Some cleaners use 5 times as much chemical as needed because they have never been trained adequately. Volume of chemicals used per sq ft of building; record of training for custodial staff.

12. OP11: Can campuses with decentralized purchasing enforce these kind of requirements?

Respondent C

Perhaps with more difficulty. But, again, we are measuring performance and shouldn't make allowances for less efficient systems.

Respondent K

Yes if the proper administrative senior V.P. or President or Board of Regents / trustees make the call.

Respondent F

yes

13. Are there any addition major product classes that should have a credit associated with them?

Respondent F

Office supplies!! Too much virgin paper used.... Fuel use (biodiesel versus gasoline for example)

14. Are there any other credits related to purchasing that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent K

Select Energy Star Products

ENERGY AND CLIMATE

1. OP14: Should the purchase of RECs be counted equally to onsite renewable energy generation?

Respondent C

Yes. Wind and solar conditions vary across localities so the option to produce or purchase renewable varies. Perhaps half-credit should be given for using these proxies.

Respondent K

NO

Respondent P

I think it is reasonable to award a credit to different percentages of total energy that comes from RECs or on-site renewable energy. For example in LEED for Existing Buildings we award a credit for 3% of total energy coming from renewable energy on-site and 25% of energy coming from off-site renewable energy generation.

Respondent E

I think OP14 is okay as written. I read this that OP14 deals with purchasing green power, and OP15 more addresses onsite renewable energy. This might be a different way of structuring these credits. I do understand the sentiment of this survey question, and I think REC's are not quite as good as onsite renewables.

Respondent F

No.

2. [Are there any other credits related to Energy and Climate that should be considered for inclusion in STARS? Please be as specific as possible.](#)

Respondent E

I discussed this a bit under the question under “rationale for selecting indicators”, but I think OP13 is not as strong as it should be. Building Energy conservation should be a centerpiece of STARS, outlining a path that is consistent with the Step it Up goals of getting to 80% reductions by 2050. I would use the 2030 challenge as a good framework for how this might be mandated. (or potentially just adopt the 2030 challenge which is a more ambitious program, leading to complete zero-carbon buildings by 2030). That framework could be written as follows: “Achieve a minimum 40 percent reduction from the current level of consumption of fossil fuels used to operate new and renovated buildings by the year 2010, and promote further reductions of remaining fossil fuel consumption by 10 percent or more in each of the following ten years;

2010	-40%
2020	-50%
2030	-60%
2040	-70%
2050	-80%

Respondent F

Yes – does purchasing dept buy ONLY energy star rated equipment? Is recycling institutionalized? (recycling can save up to 90% of the energy it takes to make goods from scratch. Recycling ultimately contributes to energy savings globally.)

MATERIALS AND RECYCLING

Respondent O

One general comment – typically with Environmental waste programs items are categorized into two primary categories which are further described.
Solid waste (goes to regular municipal landfill)
Hazardous waste/Universal Waste & Non-regulated chemical waste (must be properly managed and should not be disposed of in a municipal landfill)

1. **OP18: Is there a standardized definition of which waste streams are counted in the "diversion rate"? Are there any waste streams generally not included in diversion rate that need to be included in some other way?**

Respondent O

I think we can define anything that is discarded as unregulated “solid waste” and can be eligible for inclusion in this category. There are standard recycle-ables Glass, Plastic and Aluminum – from there the list is endless – asphalt, building materials, ceiling tiles, carpet, composting.....

Here is my definition of "Landfill Diversion Rate" that can make this as simple as possible.

The calculation for “landfill diversion rate” is as follows:

Landfill Diversion Rate = Materials diverted from landfill / (Materials diverted from landfill + Materials sent to landfill) x 100

Materials diverted from the landfill - Any solid waste (excluding Hazardous waste/Universal Waste & Non-regulated chemical waste) that was destined for disposal in a municipal waste landfill, but was diverted by the following means; reused, reclaimed, recycled, including donation or resale.

Materials Sent to landfill - Any solid waste that was sent for disposal in a municipal waste landfill, (excluding Hazardous waste/Universal Waste & Non-regulated chemical waste).

Two Rules:

1. You can only place materials in the numerator of the calculation that would have been discarded in a municipal waste landfill if discarded.
2. You must include all materials of the same waste type in the denominator of the calculation that are included in the numerator.

For example: If you include construction debris from **one or more projects** in the numerator as “Materials diverted from landfill” then you must include **construction debris** generated from **all construction projects** in the denominator. (i.e. You can not include waste types the numerator that are not fully represented / included in the denominator.)

I do feel strongly that hazardous materials universal waste and other non-regulated chemical wastes are excluded from this category and are addressed separately.

Respondent F

LEED requires glass, metal, plastic, paper recycling to be in place as a pre-requisite to a building being certified. Landscaping waste (tree limbs, mulch, grass clippings) and waste oil both get recycled here at UT. These are generally not included in ‘diversion’ data elsewhere. Also electronic equipment.

2. OP18: To avoid penalizing campuses that have already made a lot of progress, should we drop the trend requirement and instead use a series of thresholds with more points added at higher diversion rates? To account for regional differences in what diversion rates are possible, does it make sense to use the diversion rate in the surrounding community as the benchmark? For instance, a campus would get: one pt for having a higher diversion rate than the surrounding community, two pts for having 50% higher diversion rate than the surrounding community, three pts for having double the diversion rate of the surrounding community, and four pts for a diversion rate of 100%.

Respondent A

That makes sense to me.

Respondent C

I prefer both trend and absolute. Definitely don't tie requirements to community benchmarks. This would penalize institutions, especially in the west, where counties and municipalities have taken the lead on this front.

Respondent K

Yes, thresholds are better. Comparing to the surrounding community is good.

Respondent O

I suggest having a tiered approach to points based on diversion rate. Comparing a campus or University system to surrounding communities becomes very "sticky". We have campuses that are surrounded by multiple communities – do I choose the one that will make me look best? Or do I average their rates, adjusting for varying populations?

Respondent E

I think this is a good suggestion.

Respondent F

It depends on what recycling facilities are available in the surrounding community. If there are adequate facilities but eh rate is low (due to ignorance/ lack of communication) then the local rate should not be taken as the example.

3. Are there other key product types in addition to paper that we should be asking about?

Respondent A

Computers and electronics.

Respondent K

Energy Star products in general

Respondent O

Yes - I suggest checking the C2E2 tracking tool.

Respondent F

Yes – aluminum and plastic (bottles); ink cartridges and toners; waste oil; landscaping waste; electronic equipment.

4. Should we add a credit for programs that donate (or sell at low cost) computers, furniture, etc to community groups or low-income families? If so, are these programs Tier 1 or 2? How do we define them so that we can ensure such programs are significant and meaningful?

Respondent C

Definitely. Purchasing types will be more capable of writing the credit than I.

Respondent K

Yes

Respondent O

Yes – this sounds like a good idea, but keep in mind that not everyone acquiring donated or low cost computers has the means to recycle consumer electronics (computers) when they stop working. This can result in these items entering the solid waste stream (trash) and end up in a solid waste landfill. This becomes complicated when you attempt to follow an item from “cradle to grave”.

Respondent F

Yes

5. Should we add a credit about wastewater? If so, what should it be?

Respondent K

Yes . Reduction of waste and engineering newer technologies

Respondent O

Yes – I suggest we consider providing credits for having a program to reduce the volume of wastewater generated – with having specific elements in the program. This can be linked directly with potable water usage and we need to prevent “double dipping” – i.e. giving points for wastewater reductions and giving additional points for reducing potable water usage.

Respondent F

Consistent performance in relation to permit requirements; no violations in 10/ 20 years et c. good management of on site wastewater treatment systems.

6. Are there any other credits related to waste reduction that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent K

ENERGY

Respondent O

Yes - I suggest checking the C2E2 tracking tool.

Respondent E

As mentioned earlier, construction and demolition waste management might be distinct enough for a separate topic.

Respondent F

Educational – training people to use less; less paper, chemicals, energy

TRANSPORTATION

1. **OP20: Are there better ways to get at the efficiency of the campus fleet which capture all of the different alternative fuel and vehicle options?**

Respondent C

Trend plus benchmark performance.

Respondent K

Yes

Respondent E

It is a little outside of my realm of expertise, but I wonder if the trend-based credit for GHG Emissions of the campus fleet, is too weak. Simply slowly purchasing vehicles with slightly improved efficiencies would earn this credit. More significant goals could be defined, but the challenge is to create a baseline on which to measure performance against. (achieve 20% improvement over a baseline, etc...)

Respondent F

of miles covered per gal of fuel?

2. **OP21: Is this data available for most campuses?**

Respondent C

Probably not, but campuses should be given points for having them.

Respondent D

This data is hard to come by, unless the campus does a commuter survey. It might be better to ask, "Does your campus have a TDM or Alternative Transportation Program?" If so, what percentage of commuter students are registered, same for employees... Also, most universities with a relationship with a transit provider, either their own, contracted, or through a local transit provider, have university ridership numbers available through the transit agency. Another question to ask would be, assuming that all students and employees on campus must purchase a parking permit to do so, is "What percentage of your employees, resident students and commuter students purchase a parking permit?" That should tell you what percentage of affiliates are bringing SOVs to campus. To my knowledge, all campuses with carpool programs are able to track the number of carpools.

Respondent K

yes

3. Should we create an additional credit about campus air travel? If so, what should it be?

Respondent C

Certainly Tier 2. Trend and benchmark performance in miles traveled.

Respondent D

I'm not sure how campus air travel could be seen as sustainable. I wouldn't include it.

Respondent K

No, for travel may be a requirement of a scholarship grant, athletics, product review, etc.

Respondent E

Is this a significant use for campuses?

4. Should we create an additional credit about telecommuting? If so, what should it be?

Respondent C

Great idea; difficult to measure. How about pct. of full-time staff who work at home at least one day per week?

Respondent D

Seems like it might be a good idea. One question to ask is, "Does your university have a policy regarding telecommuting?" That would get you some number of credits, but the more important question to ask is, "what percentage of employees telecommute?"

Respondent K

YES

Respondent F

I think telecommuting should be given credit. Teleworking/Telecommuting can result in higher quality work at a lower cost to both the environment and the institution, while also empowering employees to work independently. STARS should encourage tracking and reporting of the number of hours/days in which workers telecommute. More points for having a certain percentage of telecommuters.

5. Are there any other credits related to Transportation that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent D

I think that as long as the question regarding BWC is asked, and then different points are awarded based on the ranking given by BWC, most of the commuting based questions will be answered.

Respondent F

Provision of biking facilities; programs designed to encourage biking/ walking. Also Some credit for % school people using mass transit. Institution should make deal with city mass transit so

reduced costs for their people to use and then show MAJOR education and measurement to see transfer from single vehicle to mass transit actually happening.

Respondent G

Would there be a way to credit campuses that have personnel and students who use environmentally friendlier vehicles? Special parking for these vehicles (free or more convenient) to encourage employees and students to purchase them? Can there be a credit for a percentage of community members who take public transportation/carpools instead of driving, for institutions who encourage and subsidize "green" personal transportation choices (rail - green vehicles and so on)?

WATER AND LANDSCAPE MANAGEMENT

1. OP26: Can this be measured reasonably accurately? Is there another quantitative way of analyzing an institution's performance on stormwater management that would allow for reasonably fair comparisons across institutions? Would requiring the implementation of a series of best practices for stormwater management be better?

Respondent K

Yes, requiring the implementation of a series of best practices for stormwater management would be better.

Respondent E

In my opinion, I believe the current wording can be measured with reasonable accuracy. I believe the word "mitigate" should perhaps be better defined. The current wording is more broad and better than requiring implementation of best practices.

Respondent F

Because of the spread out nature of the campus, and the configuration of how water is metered, it is not possible for us to determine how much goes to landscaping. Data contributing to NPDES reports (such as debris collected from street sweeping operations) is collected annually. This data could be normalized per square foot of campus space/ paved or built area. I think BMPs (Best Management Practices) for stormwater management would be good. Most NPDES (stormwater) permit holders already engage in these practices as standard.

2. Is there a way of measuring biodiversity on campus that would allow for reasonable comparisons across campuses and wouldn't be unduly burdensome to carry out?

Respondent F

difficult to do across regions/ climates/ soil types...

3. Are there any other credits related to Water and Landscape Management that should be considered for inclusion in STARS? Please be as specific as possible.

Respondent K

Irrigation audit by professionals

Respondent F

Composting and recycling of tree limbs for mulch. Absence of chemicals (pesticides, fertilizers, et c). Xeriscaping in dry climates; organic gardening; vegetable growing on campus / native landscaping providing habitat.

Respondent G

Create credit for use of stormwater instead of drinking water for toilets, irrigation and so on.