

Climate Action Plan Implementation:

Northfield, MN

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Executive Summary

This paper presents a thorough consideration of Climate Action Plan (CAP) implementation, focusing on barriers to successful implementation, best practices, and the problem of funding. An important part of this consideration will be centered on how other cities have built on or modified already existing policies, ordinances, and programs to implement their climate action plans. By utilizing the example of other cities we can identify a set of actions that have been shown to be successful in cities similar to Northfield. The included examples should be considered an initial step towards a more comprehensive understanding of the strategies other municipalities have used to enact their climate action plans.

This project combines a general analysis of implementation as a critical and challenging step in taking action against climate change with individual examples of implementation practices that may prove valuable to Northfield leaders as they make difficult decisions about how to write and enact a plan for their community. This focus allows us to make use of a wide variety of source material ranging from research by scholars in the field, who have considered relevant questions, to interviews with environmental and sustainability leaders doing work in communities that Northfield has looked to for past guidance in the CAP development process. This research aims to provide Northfield with a balanced and versatile resource to draw on as its community leaders work to implement a Climate Action Plan.

I. Introduction

A CAP is a document that outlines a coordinated selection of actions and policies with the goal of mitigating and adapting to the effects of climate change and decreasing the local contribution to atmospheric greenhouse gases (GHGs). The CAP produced for the City of Northfield will provide goals and identify strategies to reduce the amount of GHGs and set

specific dates for the implementation of these actions. It will leverage the city's ongoing efforts to reduce emissions and provide useful information and future direction to local sustainability efforts.¹ A CAP holds no official legal authority but integration with a general or comprehensive plan can provide the capability to effectively implement the suggestions outlined in the CAP.

These positive effects of a CAP will only be realized if the programs and goals within the document are fully implemented.

Our paper begins with a concise explanation of why CAP implementation matters. We then move on to a thorough explanation of the history of climate action in Northfield. After that, we address the topic of implementation by considering three categories: questions Northfield must consider before its CAP is written, how the city will be held accountable to the policies and strategies forwarded in the CAP, and the options that exist for funding the entire climate action planning process. The sections on accountability and funding are the most substantial parts of our work. Discussion of accountability includes examinations of the following key components of implementation: the best practice of leadership, the key role of city staff, community partnerships, and the potential integration of the CAP into Northfield's Comprehensive Plan. The section on funding examines five key categories: organization and specificity in the allocation of funds, the engagement of stakeholders, the creation of a sustainability revolving fund, an annual funding review process, and specific suggestions for funding sources.

There are a variety of methods outlined within this paper that, when applied, can ensure that CAP implementation is as successful as possible. In order to ensure Northfield's accountability to its CAP, we recommend that the city does four things. First, and most generally, Northfield should attain a high level of specificity in its implementation planning

¹Erik Caldwell, "Climate Action Plan Funding & Implementation Report for Fiscal Year 2017," (2017), 2, www.sandiego.gov/sites/default/files/fy17_cap_funding_implementation_memo_may_2_2016_final_2.pdf.

process. A choice needs to be made between a CAP that is itself highly detailed or a CAP that is accessible but followed by a highly detailed, separate implementation strategy document.

Second, high-level local leadership needs to be maintained and strengthened. There are not any significant choices to be made with respect to this issue. Third, Northfield must establish community partnerships with local businesses, colleges, and other groups. Deciding which partnerships are most necessary to achieve the necessary level of support and/or resources to ensure effective implementation presents the most pressing choice for the city. Fourth, Northfield should integrate its CAP with its Comprehensive Plan. It would be best to do this when the Comprehensive Plan undergoes revisions. Either the CAP becomes an amendment to the Comprehensive Plan or the Comprehensive Plan is re-written and the strategies and policies proposed in the CAP become fully embedded in the Comprehensive Plan.

In the section on funding we put forth a series of general recommendations for the best methods of gaining access to funding and how to integrate this into the CAP. Firstly, we recommend that the cap include a variety of funding sources and that these be organized effectively within the CAP. Money must be clearly tied to each proposed project and future ways of financing projects must be considered. Placing the funding sources within general categories for each area of implementation is recommended. A choice must be made on how to organize these sections. Engagement of stakeholders must be done effectively and continue throughout the planning and implementation process. A sense of cooperation in these community partnerships will enable future cooperation. The creation of a Sustainable Revolving Fund is highly recommended. This way of organizing capital would provide a specific, ongoing, and dedicated source of funding. There are several choices to be made about how to structure and provide the initial investment for the fund. Additionally, starting an annual funding review process will help

Northfield become aware of a range of possible funding options. Setting priorities and confirming funding in the review aids implementation. Finally, we provide several specific examples of programs that Northfield should look into when starting their funding search. These programs are: The Next Generation Energy Act and the Conservation Improvement Program, Clean Energy Resources Teams, The Energy Efficiency and Conservation Block Grant Program and Bonds. Each of these programs have benefits and disadvantages that must be taken into account.

II. Why CAP Implementation Matters...

A **proactive strategy** such as that outlined by a CAP can help the local economy and city mitigate and adapt to rapid environmental changes, many of which are regionally and locally specific.² Worldwide symptoms of global warming are prevalent. These include rising global temperatures, increased precipitation, flooding, drought, and melting arctic ice.³ Many of the most common effects of global warming will affect regions and states of the country differently. In Minnesota, average temperatures have risen one to three degrees in the last century. Floods are more frequent and lake ice cover is forming later and melting sooner.⁴ Due to specific geographical conditions, some cities in Minnesota will experience issues such as water shortages, flooding, infrastructure issues, changing ecosystems, and public health concerns.⁵

Without the effective implementation of the provisions outlined within the CAP the desired reductions will not be achieved and proper mitigation strategies will not be put in place. The implementation phase of the CAP is comprised of taking action on the proposed plans

² Environmental Protection Agency, “What Climate Change Means for Minnesota,” (2016), 1.

³ U.S. Environmental Protection Agency, “Climate Change Indicators in the United States,” https://www.epa.gov/sites/production/files/2016-08/documents/climate_indicators_2016.pdf.

⁴ Environmental Protection Agency, “What Climate Change Means for Minnesota,” 1.

⁵ Ibid., 1.

in the CAP. In other words, the task of implementation is the work of instituting the initiatives and programs of the CAP. This includes data-gathering and monitoring of the programs and initiatives in order to evaluate their performance over time.⁶ With the information gathered from this review, Northfield will be able to evaluate the effectiveness of the sustainability initiatives and adapt them to stay on track with emissions goals.

There are many compelling justifications for the adoption of a CAP for the businesses, citizens, and environment of Northfield. As mentioned above, the environmental benefits of this action are inherent to the definition of a CAP as a document that pursues the reduction of GHGs. These positive environmental impacts will help contribute to the general health and well-being of the Northfield community. Additionally, the introduction of a CAP provides the opportunity to make businesses and the public more aware of how their activities are connected to the collective effort to address climate change. There is already a strong interest and awareness from the community about the prospective CAP in Northfield. However, the process of implementation can provide the opportunity to engage citizens and businesses not currently committed to the idea.⁷ It is especially important to include a variety of voices in the decision and implementation process.

Some of the most compelling opportunities come from the potential economic benefits of implementation for businesses and consumers: “developing a CAP will assist agencies in evaluating, quantifying and demonstrating the regional emission reduction they can contribute,

⁶ American Public Transportation Association, “Guidelines for Climate Action Planning,” (2011), 10, <http://www.apta.com/resources/hottopics/sustainability/Documents/Guidelines-for-Climate-Action-Planning.pdf>.

⁷ United Nations Human Settlements Programme (UN-Habitat), “Guiding Principles for City Climate Action Planning,” (2015), <http://e-lib.iclei.org/wp-content/uploads/2016/02/Guiding-Principles-for-City-Climate-Action-Planning.pdf>.

possibly even in monetizable ways.”⁸ Instituting a forward-thinking plan can also help reduce the cost of regulatory compliance.⁹ There is a significant cost associated with inaction.

Finally, by sharing tactics with communities facing similar climate-related problems we can all benefit. Looking at CAPs from cities similar to Northfield will provide a series of best practices for future action that have been shown to be effective. Upon the completion of a CAP in Northfield the city will become part of the effort and in turn a resource for others seeking information.

III. History of Climate Action in Northfield

There is an extensive history of Climate action in the City of Northfield. *When implementing a CAP previous actions and programs must be taken into account and integrated effectively.* These programs and organizations that are already functioning in the area can provide support for the creation and integration of the CAP. In addition, a thorough look at the steps Northfield has already taken toward CAP creation is important to give context for our future discussion.

Relevant climate change action starts in 2001 with the founding of RENew Northfield. This is a non-profit grassroots group that has had a large impact on many local initiatives with initial focus on the promotion of locally owned wind energy projects.¹⁰ [Other organizations?]

With the encouragement of RENew Northfield and the EQC, in December 2005 the Northfield City Council passed a resolution committing the City to the Campaign.¹¹ The Cities for Climate Protection (CCP) Campaign is one of the major municipal planning networks which

⁸ American Public Transportation Association, “Guidelines for Climate Action Planning,” 2.

⁹ Ibid., 2.

¹⁰ Northfield Energy Task Force, “With Hope: A Resilient Community,” (January 2008), <http://wp.northfieldsustainability.org/wp-content/uploads/2014/09/MASTERETFReport-7-23-08.pdf>.

¹¹ Northfield City Council, “Resolution 2005-103,” 52-53.

brought together cities in America, Canada, and Europe to work towards GHG reductions and strategic energy management.¹² It was established in 1990 and operates under the International Council for Local Environmental Initiatives (ICLEI). The campaign asks that participating local governments commit to lowering GHG emissions.¹³ The CCP requires that participating cities undertake five milestones:

1. Conduct a baseline emissions inventory
2. Adopt an emissions reduction target for a target year
3. Develop a Local Action Plan
4. Implement policies and measures
5. Monitor and verify results

In order to fulfil the first milestone the a baseline greenhouse gas emissions inventory was carried out by RENew Northfield on behalf of the city in 2006.¹⁴

In May 2007 the Northfield City Council created through resolution the Northfield Energy Task Force (NETF). An official group to make recommendations concerning the energy future of Northfield was needed.¹⁵ The NETF was charged by the City Council with creating an energy action plan given the threat of a changing climate to the citizens of Northfield. The NETF was composed of eight volunteers from the community who reported directly to the Mayor and Council. The two main energy related problems that were identified were a “[1.] Heavy dependence on finite fossil energy resources with uncertain future supply and cost, and [2.] Global climate change, with potentially enormous social, economic and environmental

¹² Gard Lindseth. “The Cities for Climate Protection Campaign (CCPC) and the Framing of Local Climate Policy,” 326, doi:10.1080/1354983042000246252.

¹³ United Nations, “Cities for Climate Protection Campaign,” <https://sustainabledevelopment.un.org/partnership/?p=1498>

¹⁴ Northfield Energy Task Force, “With Hope: A Resilient Community,” 38.

¹⁵ Northfield Energy Task Force, “With Hope: A Resilient Community,” 9.

consequences.”¹⁶ A report detailing several recommendations was published in 2008, called *With Hope: A Resilient Community*. It was never adopted or implemented.

Progress has been made since the release of this original report, especially by the local colleges. In 2011, Carleton College adopted a CAP.¹⁷ St. Olaf, in 2013, created a plan for reduced campus energy consumption *Envisioning the Carbon-Neutral Campus*.¹⁸ Ongoing projects include the Carleton and St. Olaf 1.65 Megawatt wind turbines, supported by RENew Northfield.

On top of efforts by the local colleges to reduce GHGs, a long history of community participation and engagement has shaped the area. Many well-functioning clean energy programs are already in place in Northfield. In 2010, Northfield became a Minnesota Pollution Control Agency (MPCA) GreenStep City.¹⁹ This program contains a set of 28 Best Practices, grouped into 5 general categories that each designate an aspect of sustainability that can be improved.²⁰ In conjunction with these Best Practices, the MPCA provides a list of Action Steps which contain a mix of required and optional practices.²¹

Northfield has taken many actions to prepare for the creation and implementation of a CAP. In 2016, the Northfield Energy Friends re-grouped as the Northfield Energy Working Group (NEWG) to work with the Northfield Environmental Quality Commission (EQC) to continue work on energy and sustainability issues. The EQC advises on matters concerning

¹⁶ Ibid., 4.

¹⁷ Carleton College, “Carleton College Climate Action Plan May 2011,” (2011), apps.carleton.edu/campus/facilities/assets/Climate_Action_Plan_110613.pdf.

¹⁸ Elizabeth Turner, “Envisioning the Carbon-Neutral Campus Planning,” (2013), <https://stolafcarbonplan.files.wordpress.com/2013/10/turner-carbon-neutral-campus.pdf>.

¹⁹ GreenStep Cities Program, “The GreenStep 29 Best Practices,” <https://greenstep.pca.state.mn.us/bestPractices.cfm>.

²⁰ Ibid.

²¹ Ibid.

environmental quality and natural resources, including the implementation of the environmental policy enacted by ordinance. They produced a summary of other climate action plans in ten cities similar to Northfield.²² This summary puts forth a series of best practices generated from a study of the most successful CAP qualities in the sample cities. The City of Northfield established in its 2018-2020 Strategic Plan the goal of writing a CAP. In 2018, the City of Northfield City Council adopted a resolution to create a CAP Advisory Board (CAPAB) and 9 members were appointed by the Mayor.²³ Two more members were added for a total of 11 and the board also consists of two council members. A city liaison will be appointed at a future date.

IV. Implementation

An effective implementation strategy is worth as much to Northfield as any good policy idea that might find its way into Northfield's CAP. Conducting research on other municipalities, organizing meetings among city leadership, and gathering community support in the process of developing a CAP are all actions that will make a city more likely to meet its goals with respect to the mitigation of and adaptation to climate change. The energy and commitment which belong to these actions must also be directed towards considering the way in which the CAP is to be implemented. *Without implementation, a CAP is of no actionable value.*

Communities face significant obstacles when moving to enact the strategies and principles that comprise their CAPs and this often results in incomplete or insufficient implementation: "the studies that have been completed point to significant difficulties with the execution of these action plans, indicating that they are seldom implemented fully and are characterized by

²²Northfield Energy Working Group, "Community-wide Climate Action Plans," (2016), http://northfieldsustainability.org/wp-content/uploads/2018/02/NEWG-Task-3-Climate-Action-Plan-Comparison_Initial-Summary.pdf.

²³ City of Northfield, "Legistar, Northfield, MN - Official Website," <https://northfield.legistar.com/LegislationDetail.aspx?ID=3362207&GUID=D8ADCB68-7405-4A9B-999F-2498F9DD730E&Options=&Search=>.

grabbing the ‘low-hanging fruit’ while not addressing the more challenging long-range aspects.”²⁴ One thorough study conducted in 2014 on the implementation of CAPs by local governments in California provides the following categories as potential obstacles: funding, staff training, elected city official engagement, community participation, community understanding of climate science, environmental NGO participation, local business participation, access to data, monitoring, reporting, voter demographics/city politics, diffusion of regional politics, extreme events linked to climate change, public workshops, city task force or committee, collaboration of city government agencies, and staff time devoted to CAP implementation.²⁵

We divide our discussion of implementation into three general categories that address such barriers: **specificity of the plan, accountability, and funding**. In the first, on specificity, we examine the primary issue Northfield must consider before writing its CAP: the relationship between the specificity of the CAP and the implementation strategy of the CAP. The second category, **accountability**, is the most general, but it captures the major issue which most topics in CAP implementation could be reduced to: how is a city and its community going to be held accountable for the strategies and policies they forward in a CAP? We highlight five areas where accountability to the CAP is at stake and can be strengthened: the best practice of leadership, the key role of city staff, community partnerships, a potential annual review process, and the integration of the CAP into Northfield’s Comprehensive Plan. In the third category, **funding**, we examine several methods of organizing and structuring the funding process. In addition, we look specifically at a variety of funding sources and how they might be applied.

A. Specificity of the CAP

²⁴ Tue Damsø, Tyge Kjær, and Thomas B. Christensen. "Implementation of Local Climate Action Plans: Copenhagen – Towards a Carbon-neutral Capital," *Journal of Cleaner Production* 167 (2017), 406, <https://www.sciencedirect.com/science/article/pii/S0959652617318851>.

²⁵ Yuwei Qin, Shannon Rivers, and Francisca Santana, “Local Government Climate Action Plan Implementation in California,” (2014), 23.

The topic of CAP implementation is largely concerned with what happens after a plan is written — the distribution of responsibilities to the relevant city departments, the development of procedures to ensure that the strategies forwarded in the plan are actually executed by the community and the city, the problem of funding, etc. The majority of this paper is concerned with issues of these types. However, there is one decision that Northfield must make before writing its CAP that will determine, in large part, how the CAP is ultimately implemented. *The city must decide what kind of relationship between the CAP and the implementation strategy would be most effective and appropriate.*

Cities seem to understand this relationship in one of two ways.²⁶ Some imagine the CAP as *the* guiding document for the future work they do — something that can be passed around in meetings and looked to when important decisions need to be made. Other cities imagine the plan simply as a way to establish consensus and to set goals. The decision comes down to this: either Northfield writes a highly specific CAP that presents a thorough framework for the implementation of its strategies or Northfield writes a general, accessible CAP that develops political consensus, followed by a highly detailed implementation strategy. The most important point we can emphasize is that *how Northfield imagines using its CAP as a political document in the future should affect how it is written.*

The difference that the degree of specificity in a CAP makes can be demonstrated by a comparison between the implementation strategies implicit in the CAPs of two of the cities that Northfield looked to in 2016 order to better understand CAP best practices: Burlington, VT and Dubuque, IA.²⁷ The city of Seattle is a representative example of a city that created an

²⁶ We will use the examples of Burlington, VT and Dubuque, IA to illustrate this rather general point.

²⁷ Northfield Energy Working Group, “Community-wide Climate Action Plans” (2016).

implementation strategy apart from their CAP, and therefore provides a contrast to the implementation strategies of both Burlington and Dubuque.

Burlington's coordination of implementation strategies in their CAP is relatively general, lacking detail and the sort of specificity city departments could find valuable when implementing the CAP's strategies. The plan breaks down each strategy into the general sector it belongs to (Community Transportation, Government Transportation, Energy Efficiency in Buildings, etc.), provides a description of the strategy, and assigns the strategy to a specific city department for implementation (Department of Public Works, City Green Team, Burlington Electric Department, etc.).²⁸

Jennifer Green, the sustainability coordinator of Burlington, provided comments about how Burlington's CAP is used in the everyday functioning of the city government, emphasizing the consequences of the CAP's generality:

I mean arguably a lot of the things that are listed in our Climate Action Plan are indeed sort of happening, and I keep tabs on how we're sort of checking things off the list. People make general reference to it but I don't think that when the department heads get together they pull up the Climate Action Plan and make note of who's done what which month.²⁹

This comment reflects the potential challenges of using a CAP that lacks specificity for long-term political work. But that is not to say that the prospect of the CAP's long-term political utility is the only issue at stake in the decision of how specific the CAP ought to be:

You can have a Climate Action Plan that's really detailed and gets into the weeds, or you can do a sort of higher-level activity which sort of looks generally at what your key sectors are that are responsible for GHG and then [build] something that simply frames how to reduce them. It's really easy to get lost in the weeds and it's really important to at least start the process and have something. Once you have something then you can tweak it and change it and update it and all that. But I think, in the case of Burlington, we used the city of Chicago as a model, and we were so surprised when we looked at it that it was

²⁸ We include an example of how some of these strategies are organized in Burlington's CAP in Appendix C.

²⁹ Jennifer Green (sustainability coordinator of Burlington, VT) in phone conversation with author, April 2018.

so simple ... we really wanted a meaty document. We found out at the end of the day that sometimes simple is best, because you can really ... I'm not saying the detail isn't important ... but you can get hung up on the details and then just not get anything done.³⁰

Clearly, there are potential benefits to writing a general CAP. Here Green emphasizes that generality can help “start the process” and actually get something done.

In comparison, Dubuque’s coordination of implementation strategies in their CAP is excruciatingly specific and proved valuable to the *actual* implementation of the CAP’s strategies. The plan is divided into two sections. The first is a set of policy summary tables which contain a list of strategies categorized by sector of climate action (Waste Reduction and Resource Management, Local Energy, Transportation, etc.) and those strategies’ descriptions, estimated CO2 impact, and status of implementation. The second part of the plan provides a highly detailed account of each of these strategies and addresses thirteen categories relevant to the strategies’ implementation. These thirteen categories are as follows: *Sector, Policy name, Policy type, Affected entities, Current status, Estimated GHG reduction, Scope of emissions reduction, Specific description of policy, Barriers to implementation, Co-benefits, Explanation of GHG reduction impact, Relative confidence of GHG reduction estimate, Sources of uncertainty in GHG reduction estimate.*³¹

Cori Burbach, the current assistant city manager of Dubuque and its former sustainability coordinator, emphasized the benefits of having such a specific plan: “the specificity of [the plan] helps us to be very direct when we are looking at things.”³² But she also emphasized that this specificity, rather than rigidly prescribing future climate action, does not inhibit the city from adapting to new opportunities to achieve its goals: “we also have a philosophy that says that

³⁰ Ibid.

³¹ We include an example of how one strategy is detailed in Dubuque’s CAP in Appendix D.

³² Cori Burbach (assistant city manager of Dubuque, IA) in phone conversation with author, May 2018.

other things are opportunities [or] come up that weren't in the plan, because technology didn't exist or you we, we didn't see the new business or anything like that...so we also try to recognize that there is going to be a lot of flexibility in taking advantage of opportunities.”³³ A city must balance being able to capitalize on the benefits of a highly specific CAP while at the same time remaining in a position to be able to make use of emerging or future possibilities for climate action.

The city of Seattle, while of course very different from Northfield in many ways, approaches the implementation of their CAP in a way that provides a valuable counter-example to the implementation strategy represented by Burlington, VT's CAP and a similarly-spirited yet distinct analog to the implementation strategy represented by Dubuque, IA's CAP. Seattle wrote a document *separate* from their CAP that details, in very specific terms, their implementation strategy. In this document, there is a large table that is organized according to the following categories: Action, Lead Department, Other Departments Involved, 2013 Implementation Tasks, 2014 Implementation Tasks, Needed Policy Decisions, Existing Resources, Needed Resources, and Public Engagement. We include an example of what one specific strategy looks like according to each of these categories in Appendix E.

There are clear “pros” and “cons” to each level of specificity a CAP might have. A general CAP loses political authority with time, but provides the city with an accessible resource to develop political consensus and to establish climate action goals. A highly specific CAP becomes an indispensable tool in the day-to-day operations of local governments but is relatively inaccessible and risks an inflexible relationship to future methods of mitigating and adapting to climate change. Ultimately, we recommend that Northfield achieve a highly specific

³³ Ibid.

implementation strategy somehow, whether this is by writing a CAP that details, with a high degree of specificity, how its strategies are to be achieved, or by writing a general CAP that is followed by a highly specific document exclusively focused on how the CAP's strategies will be implemented.

The co-benefits to a highly specific CAP only exist to the extent that Northfield's overall implementation of their CAP's strategies are successful. The co-benefits to a general CAP are largely social: a general CAP allows for broader public engagement and, potentially, increased political consensus given its accessibility.

B. Accountability

The topic of implementation is in a large part a question of accountability.³⁴ Northfield must ask itself how it is going to be held accountable to the policies and strategies it will enact in its CAP. We describe four very different opportunities available to Northfield for ensuring this accountability: achieving the best practice of leadership, effectively engaging city staff, making use of community partnerships, and integrating the CAP, in some way, into the city's Comprehensive Plan.

1. The Best Practice of Leadership

There is unanimous agreement between our sources that effective implementation of a CAP requires strong and sustained local leadership. The secondary literature agrees with the feedback we received from individuals who are working hard today on climate projects in other cities.

Authors van Staden and Musco note that

In communities where local climate action is effective, this often is due to a political leader acting as champion for the cause, supported by informed technical staff, and – in the most successful cases – backed by the whole city council which is in agreement that

³⁴ See Michael Boswell, R. Greve, and Adrienne Seale, "Implementation," in *Local Climate Action Planning*, Washington, DC: Island Press/Center for Resource Economics (2012).

climate protection is a priority for all political parties. Such cross-party political consensus is invaluable for stability and continuity.³⁵

When we asked Jennifer Green, the Sustainability Coordinator of Burlington, VT, what advice or recommendations she would give to a city starting from scratch in the climate action planning process, the very first argument she made was centered in the issue of political leadership and consensus:

I would start by ensuring that the demand or request for the Climate Action Plan is coming from the highest level of government. It can certainly be generated by the public, but then you have to have political buy-in....if it doesn't have the backing of government, if it doesn't stick somewhere in the government then the likelihood of a whole lot of progress being made is fairly slim.³⁶

Northfield has been working on the development of its CAP for a long time. Political buy-in is there. This engagement and support must continue and become stronger. Given that CAPs do not have any *legal* authority, the communal authority must somehow be translated such that individuals in position of power in the municipal power are held accountable by the CAP:

One consideration in implementation is how to hold these entities [city departments responsible for implementation of specific strategies] accountable. This is where having an implementation committee with the right people can be critical to success. If it is staffed by the people who have decision-making authority in their respective agencies and organizations, then it is much easier to ensure implementation.³⁷

The co-benefits of effective leadership are mainly centered in the ability of Northfield to establish a firm foundation for taking action on climate. This will instill confidence in local businesses and social groups about the direction the city is heading in terms of climate policy. Benefits of effective leadership also include the extent to which Northfield's overall implementation of its CAP's strategies is successful.

³⁵ Van Staden, Maryke and Francesco Musco, *Local Governments and Climate Change*. Vol. 39. Advances in Global Change Research. Dordrecht: Springer Netherlands, (2010), 115.

³⁶ Jennifer Green (Sustainability Coordinator of Burlington, VT) in phone discussion with the author, April 2018.

³⁷ Michael Boswell, R. Greve, and Adrienne Seale, *Local Climate Action Planning*, Washington, DC: Island Press/Center for Resource Economics (2012), 187.

2. The Key Role of City Staff

Northfield already understands the importance of building on existing city staff, policies, and structures to implement a CAP. The city is also aware that other cities sometimes bring on additional staff whose major responsibility is this implementation. Secondary scholarship on CAP implementation emphasizes that these two paths, the use of already existing resources and the addition of new ones, represent the major initial choice municipalities face as they move to enact the strategies forwarded in their CAPs. If new positions are created to carry out implementation, then the city must determine where in the structure of the city government they are to be located. In *Local Climate Action Planning*, Boswell, Greve, and Seale note that “most communities have chosen to house climate programs in environmental, planning, or public works departments to take advantage of the specialized expertise and similarity of mandates. Some communities have chosen to house them in the mayor’s or city manager’s office to take advantage of the authority and visibility of those offices.”³⁸ If existing positions are relied on to carry out implementation, a whole host of other factors must be considered. Boswell, Greve, and Seale note that with this method “the potential problems are that existing mandates and programs may overshadow the new climate strategies, implementation may be uneven across parts of the organization, and accountability may be diffuse.”³⁹

These potential problems can be avoided by the effective delegation of the tasks the CAP ties to individual mitigation and adaptation strategies: “The implementation committee or climate program coordinator must identify a specific individual, agency, department, or organization responsible for implementing each strategy. For example, a strategy to replace light

³⁸ Ibid., 184.

³⁹ Ibid., 184.

bulbs in traffic light with high-efficiency LEDs would likely be assigned to a municipal transportation or public works department.”⁴⁰ In other words, identifying and associating a specific agency with a specific task is the first step of a CAPs successful implementation. Only the specific tied to the specific becomes actionable.

One scholar whose research we found valuable to thinking about CAP implementation pushes these conclusions even further. Once individual departments in a city government are made responsible for implementing individual strategies of a CAP, the problem becomes how effectively the departments are able to carry out their new mandate. Sarah Burch addresses this problem in her study of three Canadian municipalities’ implementation of CAPs, focusing on the problem of integrating CAP strategies into the workflow of municipal employees:

The interviewee responses.... indicate that few municipal employees have the time or inclination to add additional complex tasks to already overburdened staff, making ingenuity and innovation rare (but invaluable) exceptions to the daily reality of administering cities. Climate change mitigation and adaptation must thus become part of the job descriptions and standard operating procedures of municipal employees, rather than ‘extras’ that are pursued if time and budget allow. In the event of a system-wide shock, such as that experienced during the financial crisis of 2008-2009, this institutionalization of climate change action becomes especially critical.⁴¹

By the idea of the “institutionalization of climate change action,” Burch emphasizes both the challenges and potential of already existing governmental structures to take significant responsibility for CAP implementation.

One example of this sort of institutionalization is reflected in Traverse City’s proposals to fully engage municipal staff in the spirit of its CAP. We quote in full:

Getting all City employees involved in energy conservation and environmental stewardship will greatly increase the impact of this climate initiative. With staff involvement this plan can have greater impact on the community as a whole and the local

⁴⁰ Ibid., 186.

⁴¹ Sarah Burch, “Transforming Barriers into Enablers of Action on Climate Change: Insights from Three Municipal Case Studies in British Columbia, Canada,” in *Global Environmental Change* 20, no. 2 (2010), 294.

environment because behavior changes at work can translate into changes at home as well. Education activities may include: A good first step is to inform employees of the ratification of the Climate Action Plan and the importance of energy conservation. Keep staff informed throughout the implementation process of the Energy Action Plan. Post energy conservation flyers around the office (flyers are included on the Resource CD) Consider distributing a bi-annual energy conservation newsletter to employees with tips on saving energy at home and at work (newsletter is included on the Resource CD) Consider recognizing and/or rewarding staff by department or individual for energy conservation efforts (draft certificates are included on the Resource CD).⁴²

Examples like these seem to suggest that if a municipal government is going to entrust specific implementation responsibilities to specific departments, the employees of those departments are more effective in their new duties if they are exposed to the logic and reasons that are driving such duties.

Burlington's CAP evidences the most rudimentary form of this kind of delegation as it might be expressed in a CAP. At the end of the document, after a brief description about how the city will implement its plan, a few pages of charts are included that detail specifically a) the strategies the city will employ to mitigate and adapt to climate change and b) the department in the city or other local actor who is responsible for implementing these strategies. In a few instances, a specific strategy is assigned to a city department that is "to be determined." In other instances, a specific strategy might be assigned to *all* city departments. A few examples will clarify how this part of Burlington's CAP is constructed and the relationship between specific strategies and specific departments that are assigned to implement those strategies.

One of Burlington's strategies is to "incentivize energy efficient building siting, design and operation through zoning."⁴³ This entails that the city must "develop a form-based code that will ensure efficient building design and siting, and continue to require the use and

⁴² City of Traverse City, "City of Traverse City Climate Action Plan," 24.

⁴³ City of Burlington, "Burlington, VT Climate Action Plan," 21.

implementation of the Energy Code."⁴⁴ The Planning and Zoning Department is tasked in the CAP with taking the lead on this strategy's implementation. Another of Burlington's strategies is to "Explore a residential Pay as You Throw (PAYT) program."⁴⁵ This entails changing "the current residential collection payment system to a system in which residents pay per unit of trash collected. Programs like these result in a decrease of solid waste, as well as overall cost savings to participants."⁴⁶ The Department of Public Works is tasked in the CAP with taking the lead on this strategy's implementation.

3. Community Partnerships / Stakeholders

Regardless of the scope of the proposed CAP, engaging relevant stakeholders from municipal departments and the community is a crucial step in the process. In the ICLEI guidelines it is suggested that CAP "inclusively engages multiple agencies, economic actors and community stakeholders."⁴⁷ *Stakeholder partnerships should be introduced in the beginning of planning and be "nurtured and leveraged throughout the planning process and implementation."*⁴⁸ The identification of possible partners needs to happen in the beginning of the process of Climate Action Planning; Northfield should think about this as soon as possible. Community partnerships can include governmental agencies, nonprofits and community groups, and local colleges (this is an important factor for Northfield). Existing partnerships and groups that are already involved in Northfield such as RENew Northfield, the Northfield Energy Working Group, or the local colleges Carleton and St. Olaf will likely continue to play an important role.

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ United Nations Human Settlements Programme (UN-Habitat), "Guiding Principles for City Climate Action Planning," 5.

⁴⁸ American Public Transportation Association, "Guidelines for Climate Action Planning, 7.

Stakeholder participation including partnerships with community organizations helps ensure that the plan is relevant and contains “broad-based support for implementation.” Community Partners can help most stages of the process of creating and implementing a CAP. *Local Climate Action Planning* suggests areas where they can be of use, such as data collection, community education and outreach, stakeholder mobilization, implementation, and monitoring.⁴⁹ They can also provide expertise, and enhance the effectiveness of implementation.⁵⁰ Stakeholder buy-in enhances the likelihood of implementation because so much of what needs to be done is outside the formal control of government and involves things that businesses and nongovernmental organizations do.

4. Integration of CAP into Comprehensive Plan

A CAP’s lack of any binding legal authority introduces further challenges to making a city accountable to its plan. If a city is not legally required to execute the strategies forwarded in the CAP, measures outside of local legal structures are required to ensure execution. All of the strategies discussed up until this point that have focused on ways of ensuring Northfield’s accountability to their CAP are strategies that exist outside of any formal legal structures. In this section, we discuss one strategy to ensure a city’s accountability to their CAP that exists within legal structures of local government: the integration of the CAP into the city’s Comprehensive Plan.

A study of the ways in which a large number municipalities in California implemented CAPs recommended three actions other cities should focus on when developing similar plans. One of these actions was to “create opportunities for regulatory efficiencies by integrating the

⁴⁹ Michael Boswell, R. Greve, and Adrienne Seale, *Local Climate Action Planning*, 37.

⁵⁰ *Ibid.*, 37.

CAP into the General Plan.”⁵¹ In California, a General Plan is “the local government’s long-term blueprint for the community’s vision of future growth.”⁵² This makes the General Plan analogous to a Comprehensive Plan in Minnesota and, therefore, in Northfield: “the comprehensive plan shall contain objectives, policies, standards and programs to guide public and private land use, development, redevelopment and preservation for all lands and waters within the jurisdiction of the local governmental unit.”⁵³ Northfield’s version of the General Plan is called a “Comprehensive Plan” and is “a document that outlines long-range plans for managing the growth of the community.”⁵⁴ It “provides a framework for establishing policies, standards and principles pertaining to the city’s planning, zoning and public service activities” and “was updated in November of 2008 after an extensive revision process.”⁵⁵

A General Plan possesses far more authority than a CAP and therefore strengthens a CAP’s role in the everyday decision-making process of a municipal government. The authors of the California study argue that “CAPs as stand-alone documents without a strong link to the GP are more likely to be given less attention or resources...GPs are mandatory, legally binding documents prepared by cities to outline long-term development plans.”⁵⁶ They cite additional benefits: “in addition to extending staff resources, to incorporating the CAP into the GP. State law requires internal consistency amongst all GP policies and elements, and all elements of the GP must have equal status in which no element is legally subordinate to another should conflicts

⁵¹ Qin, Yuwei, Shannon Rivers, Jennifer Roecks, and Francisca Santana. "Local Government Climate Action Plan Implementation in California," (2014), 1.

⁵² The Office of Planning and Research, “General Plan Guidelines,” <http://www.opr.ca.gov/planning/general-plan/>.

⁵³ The Office of the Revisor of Statutes, “2017 Minnesota Statutes,” <https://www.revisor.mn.gov/statutes/?id=473.859>.

⁵⁴ City of Northfield, “Comprehensive Plan,” <https://www.ci.northfield.mn.us/286/Comprehensive-Plan>.

⁵⁵ Ibid.

⁵⁶ Ibid., 51.

between plan elements arise (OPR, 2003). Therefore, all city activities must align with the GP and the CAP if it is referenced in the GP.”⁵⁷

If Northfield accepts the idea that integrating the strategies of the CAP into the Comprehensive Plan is a good idea, the question of how this integration is achieved becomes an essential question in Northfield’s overall CAP implementation strategy. The Metropolitan Council’s Local Planning Handbook⁵⁸ contains an especially detailed consideration of the ways in which climate change mitigation, adaptation, and resiliency strategies can be integrated into local planning procedures. The scope of this paper and our own understanding of the methods and procedures of Northfield’s planning process limits the extent to which we are able to discuss the Handbook, but *we recommend that Northfield use the Local Planning Handbook to better understand how a comprehensive plan can be updated to reflect the goals and strategies of a CAP.*

Northfield community members actively involved with the city’s planning offered their perspectives on the possibility of integrating Northfield’s CAP with Northfield’s Comprehensive Plan. Matthew Rohn, a member of Northfield’s Environmental Quality Commission, endorsed the idea of CAP/Comprehensive Plan integration and provided a helpful reflection on how the CAP could be written with input from planning officials in Northfield:

This [CAP/Comprehensive Plan integration] should be a two-way process and on-going through the CAP process (and after). CAP folks should be flagging Comprehensive Plan items and running appropriate ones by the Planning Commission to get feedback (on what is working and thoughts on possible changes). The Planning Commission might take a session to collect from its knowledge and experience and send to CAP Advisory group things the Commission itself sees as matters for consideration. A regular schedule might be set forth for when CAP work groups suggested items sent through the Advisory

⁵⁷ Ibid., 51.

⁵⁸ The Metropolitan Council is “the regional policy-making body, planning agency, and provider of essential services for the Twin Cities metropolitan region” (see <https://metro council.org/About-Us/The-Council-Who-We-Are.aspx>). Their Local Planning Handbook is intended “to help communities update their local comprehensive plans” (see <https://metro council.org/Handbook.aspx>).

group receive some feedback from the Planning Commission or a subcommittee of it so this not an inconvenient list of things needing sudden feedback but good, respectful dialogue takes place.⁵⁹

Scott Tempel, Northfield's City Planner, gave a detailed consideration of the various ways the CAP might be integrated into Northfield's Comprehensive Plan and the pros and cons of each option:

There are several ways for the CAP to proceed. First, it could be adopted as a stand-alone plan and not be an official part of the Comprehensive Plan. This seems to be common in Northfield, but doing so would not give the plan the full enforceability of the law. As part of the Comprehensive Plan, the council may not adopt any ordinance that conflicts with the comprehensive plan. The plan could also be adopted as an amendment to the Comprehensive Plan. It would be a stand-alone document and policy, but be approved via the public process for the Comprehensive Plan amendments and fall under the dominance of the Comprehensive Plan. This is likely the preferable path. The final approach would be to integrate the CAP policies into the Comprehensive Plan. This would involve a complete rewrite where CAP policies are applied to each section of the plan so all sections work in harmony to promote the CAP goals. This is also a common approach, usually undertaken in coordination with a planned Comprehensive Plan update. It basically makes the entire Comprehensive Plan operate on the underlying basis of sustainability.⁶⁰

Tempel gives three options here: One, the CAP and the Comprehensive Plan remain separate.

Two, the CAP becomes an amendment to the Comprehensive Plan. Three, rewrite the Comprehensive Plan to integrate specific CAP policies into relevant comprehensive plan sections. He recommends the second option: "My recommendation would be to adopt the CAP as an amendment to the Comp Plan and create a section of the CAP that provides guidance on what policy changes should be implemented and goals adopted in each section of the comp plan when it is updated."⁶¹

⁵⁹ Matthew Rohn (professor of Art History at St. Olaf College and member of Northfield's Environmental Quality Commission) in email discussion with the author, May 2018.

⁶⁰ Scott Tempel (Northfield City Planner) in email discussion with the author, May 2018.

⁶¹ Ibid.

Aside from the question of *how* the CAP will be integrated into the Comprehensive Plan, there is the additional question of timing. *When* should a city integrate the two plans? The integration of the CAP with the Comprehensive Plan would introduce new strategies and policies into the long-term planning goals and procedures of Northfield. It therefore makes sense to time this introduction of new strategies and policies when the long-term goals and procedures are shifting as well: the California Governor’s Office of Planning and Research argues that “it is preferable to create the plan to reduce GHG emissions [a goal addressed by CAPs] concurrently with or closely following a general plan update.”⁶² Two of the reasons that the California Office of Planning and Research gives for their argument regarding the timing of integration are relevant to Northfield’s situation. First, writing a CAP as the comprehensive plan is being updated has the effect of “allowing local governments to include a wider range of mitigation measures in the GHG reduction strategy, especially those that are related to land use and transportation.”⁶³ Second, and perhaps more importantly, writing a CAP as the comprehensive plan is being updated has the effect of “ensuring that the CAP and general plan use a consistent set of baseline conditions and growth assumptions, which can save effort for planners.”⁶⁴ In other words, a city that has a CAP and a comprehensive plan has two documents that are both used to make decisions in the short term and which guide long-term policy planning. Given this convergence in function, the integration of specific strategies in the CAP that are relevant to specific sections of the Comprehensive Plan would synchronize the planning decisions Northfield will have to make. This applies in both the short and long term.

⁶² Governor’s Office of Planning and Research, “State of California General Plan Guidelines” (2017), 224.

⁶³ Ibid.

⁶⁴ Ibid.

Any intersection between the writing of a CAP and the updating of a comprehensive plan presents a unique opportunity to engage locals in thought, deliberation, and feedback about the role that issues of climate action will take in the future of their city, since every update to a comprehensive plan requires significant input from the local community members. When Dubuque, Iowa⁶⁵ upgraded their Comprehensive Plan, they made sure to integrate the orient a significant part of their ‘community engagement process’ around the concerns of their CAP (the 50% by 2030 plan):

We just finished an eighteen month process last year to update our community’s comprehensive plan. That was a process that our planning department was in charge of implementing. We hired an outside consultant to help us in the community engagement process, and we were very intentional that everything that went into that plan came from citizen input. So that eighteen months we had 6,000 individuals who provided their ideas. When we scheduled the public meetings for that plan we scheduled them around our three sustainability pillars: environmental integrity, economic prosperity, and social-cultural vibrancy....So we got a lot of input around the ideas that are in the 50% by 2030 plan.⁶⁶

The major “pro” of integrating the CAP into the Comprehensive Plan is that by doing so the CAP will be given some legal teeth. This makes the city much more accountable to its CAP. Moreover, the CAP and the Comprehensive Plan, two documents that both seek to detail the long-term planning vision of the City of Northfield, would be consistent. This would greatly aid the decision-making procedures of planning officials in the city. Cori Burbach’s comments above regarding the public engagement process that contributed to Dubuque, IA’s revision of their Comprehensive Plan point to the additional benefit of a community feedback process centered around climate action issues and oriented to the long-term well-being of the city. The major “con” of integrating the CAP into the Comprehensive Plan is that it could potentially

⁶⁵ Dubuque was another city Northfield looked to when trying to understand what a CAP is.

⁶⁶ Cori Burbach (Assistant City Manager of Dubuque, IA) in phone discussion with the author, May 2018.

require a complete revision of the city's Comprehensive Plan, a process that would not doubt require an inordinate amount of time and energy. These challenges are mitigated by timing the revision of the Comprehensive Plan to occur simultaneously with the writing of the CAP, and by adopting the CAP as an amendment to the city's Comprehensive Plan.

The co-benefits of a potential integration of Northfield's CAP into its Comprehensive Plan are extensive. They are largely centered in the enhanced legal authority of the CAP once it becomes, in some way, part of the city's Comprehensive Plan. The greater authority the CAP has in the community, the greater the extent to which Northfield's overall implementation of their CAP's strategies are successful. Consistency between long-term visions of how the city is to develop and grow will be achieved. This not only makes the lives of city planners easier, but ensures a reliable foundation upon which local social, environmental, and business groups can make decisions. A unique opportunity also arises to engage local community members around a planning process rooted in environmental and sustainability issues.

C. Funding

One of the most significant barriers for implementing a CAP is providing consistent access to capital for projects. Many state and local governments have found ways to use both innovative financing mechanisms as well as traditional finance tools to support their strategic energy goals. A thorough CAP will help to prepare the city to compete for a variety of funding sources. The act of instituting a CAP itself can open up sources of funding that depend on having a CAP or similar plan (GHG reduction plan or energy efficiency plan) already in place.

Possibilities for funding include general funds from local government sources, state and federal grant programs, donations, grants, and partnerships with stakeholders. These funds can be used to provide capital for projects, pay for maintenance, and sustain existing programs. A lot of

the resources available are delineated between adaptation and mitigation of climate change. Most often they are also divided into topical subfields such as water, air, recycling and so forth. Other types of grants available are those connected to themes such as education and justice efforts or centralized funding available for a particular region or state. Many programs such as the State and Tribal Assistance Grants (STAG) are only available through various state agencies, often organized through a centralized office like the governor's office.⁶⁷ Utilizing a diverse mix of these resources will be central to developing an economically sensible plan.

1. Organization & Specificity in Allocation

In order to implement a plan that reduces emissions in a fiscally efficient way, it is crucial to clearly specify sources, amount of funding required and the distribution to each area of action. Jennifer Green acknowledged that the City of Burlington's CAP "...doesn't have a whole lot of teeth because there wasn't any money associated with each proposed project or policy change."⁶⁸ Indicating clearly in the CAP the source for each separate project will help avoid confusion and the resulting delays in implementation. Another benefit of this process is that gaps in funding can be clearly identified and addressed. In order to do this effectively, the CAP must consider not only present but future sources; this will help specifically to provide *consistent* funding. A thorough consideration of the effects of future alterations in funding sources is recommended such as the end of a grant program.

An important part of gaining access to funding is being able easily provide information on funding sources and uses. This type of accountability can be aided by clear organization. For stakeholders in the community to wish to participate in CAP projects, it will be important to have a clear picture of the overall monetary state of the programs. Providing this in an accessible way

⁶⁷ U.S. Environmental Protection Agency. <https://www.epa.gov>.

⁶⁸ Jennifer Green (sustainability coordinator of Burlington, VT) in phone conversation with author, April 2018.

has the co-benefit of making things easier for stakeholders. We suggest that funding be organized by general categories of implementation such as other CAPs have used:

Ann Arbor

- 1) climate and energy
- 2) community
- 3) land use and access
- 4) resource management

Burlington

1. Housing
2. Infrastructure and Transportation
3. Extreme Weather Events and Impacts
4. Food Security
5. Participation, outreach, and education

Because many of the available sources of funding are already organized along these lines this should be a logical structure.

2. Engagement of Stakeholders

It is important to have the support of the actors in Northfield's economy and engaging local businesses can be done most effectively when it can be shown that the CAP is fiscally astute. The CCP Champaign initiated a Milestone Survey in 1997 by asking participants report their progress which included 174 local governments. The survey found that the key for success for many cities had been the "development of partnerships with state, provincial, and national governments, as well as with private financial institutions, all of which enabled cities to raise significant capital for climate projects."⁶⁹ Stakeholder participation not only benefits the initial stages of implementation but extends to the ongoing attainment of funding and resources. Continued engagement with stakeholders throughout the process of implementation is important.

⁶⁹ Gard, Lindseth, "The cities for Climate Protection Campaign (CCPC)," 330.

⁷⁰ A sense of cooperation and commitment to the future of the CAP is important for our community partners. This will enable the continued access to the resources that they can lend such as funding. It will also allow the participating stakeholders to become a part of the CAP in a way that may be economically sensible. Many of the possible projects included in the CAP have the possibility to return the cost of the initial investment.

3. Creation of a Sustainability Revolving Fund (SRF)

A Sustainability Revolving Fund provides a dedicated funding source for implementing CAP programs that result in ongoing cost savings. Savings from previous projects are then tracked and then reinvested in the fund for the next round of financing. A SRF is a great option for the northfield community because of how it would maximize resources. Many projects that will be included in the Northfield CAP will be self-funded, low, or no cost opportunities. These opportunities often take the form of programs that can be easily integrated into existing programs. The Carleton CAP utilized these types of options in order to construct a financially viable plan.⁷¹ By making careful funding and operational decisions “that cost-effectively reduce emissions in a technically and politically feasible way, agencies can often recoup their costs over the life of those investments.”⁷² These savings can derive from lower costs from reduced energy consumption and maintenance costs. In these situations, a SRF can provide funding for the up-front costs of the project with the assumption that savings will be reinvested.

Two SRF at Carleton College provide a useful example for how a SRF can function effectively. One fund is available to the community and the other is built into the annual facilities

⁷⁰ American Public Transportation Association, "Guidelines for Climate Action Planning," 7.

⁷¹ Carleton College, "Carleton College Climate Action Plan May 2011," 47.

⁷² American Public Transportation Association, "Guidelines for Climate Action Planning," 2.

operating budget and provides money to student initiated projects on campus.⁷³ The funds “establish a framework for supplementing upfront costs for projects that are expected to generate simple payback within six years.”⁷⁴ 90% of savings accrued within these first 6 years go directly back into the fund and the additional 10% is returned to CSA to repay their initial investment.⁷⁵ Some examples of the types of projects that have been funded are the installation of low-flow showerheads and the addition of drying racks as alternatives to washing machines.

We recommend that Northfield follow the model of Carleton College and institute a required payback period. Additionally, the SRF will have to be overseen by the Northfield City government, preferably a small board with no more than a dozen members for maximum efficiency. One disadvantage of this proposal is that it will require initial funds that must be diverted from another source. It is a possibility that this problem can be overcome to some extent by starting with a relatively small amount and letting the funds accrue over time.

4. Annual Funding Review Process

Carleton’s sustainability office works with the Office of Corporate and Foundation Relations to “develop a list of resources that offer environmental grants and incentives so that they may be monitored regularly for opportunities that align with current phases....”⁷⁶ Dubuque has done something similar that they refer to as the Annual Council Goal-Setting Process; they have a “goal-setting process every year where they identify their top priorities for the upcoming fiscal year” and this process drives their budget.⁷⁷ This process is particularly helpful when there are specific actions in Dubuque’s plan that need capital investment. Especially with larger

⁷³ Carleton College, “Carleton College Climate Action Plan May 2011,” 47.

⁷⁴ Ibid., 47.

⁷⁵ Carleton College, “Sustainability Revolving Fund,” <https://apps.carleton.edu/sustainability/action/srf/>.

⁷⁶ Carleton College, “Carleton College Climate Action Plan May 2011,” 47.

⁷⁷ Cori Burbach (Assistant City Manager of Dubuque, IA) in phone discussion with the author, May 2018.

investments Dubuque recommends a thorough look at grant strategies and other funding methods.

Northfield should apply this strategy. Importantly, putting in place this program before the implementation of the full CAP would provide a useful head start that would aid in implementation. An organizing body such as CAPAB could initiate this work. A good place to start this work would be by looking at the compilation of various grant programs that the state of Minnesota provides.⁷⁸ On the national level, The U.S. Department of Energy under the clean cities program provides a useful review of funding opportunities in the field of transportation.⁷⁹ These are the types of source that could be part of the review.

We suggest that this annual review process be done in conjunction with a general annual review process for monitoring the implementation of CAP measures and programs. Connecting these two programs will provide information useful for the tracking the progress of programs such as the funding that was available for operations and maintenance.⁸⁰ Data about the success of ongoing programs in Northfield gathered as part of the general review can lend them significant credibility. This can encourage further financial support from a variety of sources (including stakeholders) and open up new opportunities for funding.

5. Specific Suggestions for Funding Sources

In researching and discussing the funding choices of other cities a diverse array of funding options. While some funding can come from existing City departmental budgets, funds can be limited and it is beneficial to look into resources that lessen this burden. Here are some of

⁷⁸ Department of Administration Grant Management.

⁷⁹ U.S. Department of Energy, “Funding opportunities,” <https://cleancities.energy.gov/funding-opportunities/>.

⁸⁰ American Public Transportation Association, “Guidelines for Climate Action Planning,” 21.

many that may be applicable to Northfield. We suggest a full review of options as part of the annual funding review process.

The Next Generation Energy Act and the Conservation Improvement Program: The Next Generation Energy Act of 2007 “established energy conservation as a primary resource for meeting Minnesota’s energy needs while reducing harmful emissions.”⁸¹ The act has a goal of reducing, by 1.5%, the annual electricity and natural gas sales for the state. [pledged to cut Minnesota’s GHG emissions 80 percent by 2050] The Conservation Improvement Program (CIP) is part of the effort to meet these reductions. With the goal of helping utilities reach this energy savings goal, the Act “authorizes the commissioner to assess utilities \$3,600,000 annually for grants for applied research and development projects.” This consists of:

- \$2,600,000 for the Conservation Applied Research and Development (CARD) program through which Commerce awards grants in a competitive Request for Proposal (RFP) process
- \$500,000 for the Center for Sustainable Building Research to coordinate activities related to Sustainable Building 2030 (SB2030)
- \$500,000 for the Clean Energy Resources Teams (CERTs) for community energy technical assistance and outreach.

Clean Energy Resources Teams: Clean Energy Resources Teams (CERTs) offers a variety of services including a series of publications including “case studies, reports, and presentations that delve deeper into project models and specific issues.” It also offers updates about current renewable energy projects across Minnesota. CERT awards seed grants to community groups across Minnesota for energy efficiency and clean energy. Over 1 million in funds divided

⁸¹ Ibid.

between 269 projects has been granted since 2006.⁸² Four projects have received funding in Northfield or the surrounding area: one in 2008, two in 2010 and one in 2016.

The project undertaken in 2016, the Communicating our Progress on Energy Savings Project, provides a current example to the type of project that is eligible for funding. Funds were granted to St. Dominic Parish to be used by students to test the electronic equipment in the school to find sources of energy waste. Applying for funding for more projects could contribute funds needed under a CAP implemented in Northfield. One downside of this source is that the funding is provided for a specific and finite project. Individual grants have a place in the longer term question of funding but they will not provide a sustainable source.

The Energy Efficiency and Conservation Block Grant Program: Under the 2009 American Recovery and Reinvestment Act (Recovery Act) the Department of Energy's (DOE's) Energy Efficiency and Conservation Block Grant (EECBG) Program provided 3.2 million dollars in grants.⁸³ These were granted to communities to: "develop, promote, implement, and manage energy efficiency and conservation projects that ultimately created jobs."⁸⁴ This is a nationwide investment in energy efficiency and renewable energy technologies that has been utilized by many cities similar to Northfield.

Bonds: A common source of low cost capital for local and state governments is bonds.⁸⁵ Most often smaller projects are included within larger bond insurances due to bond financing. Energy projects such as those in Northfield may want to consider tax-exempt bond financing for

⁸² CERTs, "CERTs Seed Grant Projects," <https://www.cleanenergyresourceteams.org/projects>.

⁸³ Office of Energy Efficiency & Renewable Energy, "Energy efficiency and conservation block grant program."

⁸⁴ Ibid.

⁸⁵ Office of Energy Efficiency & Renewable Energy, "bonding tools."

nonprofit organizations and industries.⁸⁶ An example of a project eligible tax-exempt for financing is energy efficiency retrofits. A disadvantage for this type of funding is that voter approval is required in most cases.⁸⁷

VI. Conclusion

A. Co-benefits of Key Implementation Strategies

An effective implementation strategy will result in social, environmental, and economic benefits for the residents and businesses of Northfield in one of two ways. First, and most importantly, a successful implementation will mean that all of the other strategies and policies that comprise the CAP will have been successfully implemented and the city will begin to reap the benefits of those strategies and policies' effects on climate change mitigation and adaptation. Second, the methods of achieving this successful implementation themselves have co-benefits, which we have emphasized throughout the paper. But most generally, by implementing its CAP effectively, Northfield not only better ensures its success on climate action, but demonstrates that it is a responsible party, that citizens can trust that the ideas, questions, and concerns they offer to their local government are not only taken seriously, but find their way into real changes for the community.

B. The Importance of Implementation

Without an effective implementation, a CAP is virtually meaningless, an aspirational document that does not result in a community that is better prepared to confront the complex and

⁸⁶ Office of Energy Efficiency & Renewable Energy, "tax exempt."

⁸⁷ The IRS is no longer processing new clean renewable energy bonds (CREBs). These were tax credit bonds that were the companion to the Section 45 tax credit for renewable energy production. Initially authorized in the Energy Policy Act of 2005, they were a popular option for state and local government that allowed non-tax paying organizations to borrow capital without paying interest in order to finance a qualified energy project. As a result of the Tax Cuts and Jobs Act signed by President Trump on December 22, 2017 funding is limited to projects already granted funding.

Office of Energy Efficiency & Renewable Energy, new-clean renewable energy bonds

increasingly urgent challenges of climate change. In this paper, we have attempted to isolate and explicate some of the crucial strategies and policies to a successful implementation. The CAP somehow needs to be tied to specific strategies for implementation. Effective leadership, the engagement of city staff, community partners, and the integration of the CAP into the city's Comprehensive Plan will all help to ensure that Northfield is held accountable to the strategies and policies it forwards in its CAP. A detailed consideration of the various funding options and strategies available will ensure that the city has adequate resources to achieve its climate action goals. Northfield has already taken significant steps towards understanding what a CAP is and how one is written. Next, the city need to take steps towards refining its understanding of what strategies and policies will ensure that the CAP effects real change. We are confident this change can be achieved.

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Appendix A - Interview with Jennifer Green⁸⁸

This brief (~15 min) interview was conducted with Jennifer Green, Burlington VT's Sustainability Coordinator, on Thursday, April 26.

The interview essentially begins with a question from Jennifer.

Jennifer: Do you guys have a municipal electric utility or is it a private utility?

Peter: That's an interesting question - I do not know.

J: To whom do you pay your electric bill?

Peter: [I don't know]

J: That's going to be, you know, Burlington, we're in a good position because we have a municipally owned utility, so essentially the people of Burlington are the owners of our electric department and that really helps because we have sort of power over a lot, compared to an investor-owned utility. Sometimes there's a sense that there is not a lot of sway, enough persuasion a community can have over how that utility operates or what it does. So anyways, it would be good to know that, I think.

P: If you could speak first maybe broadly about how Burlington has ... I was looking through your Climate Action Plan and basically my understanding of your implementation procedures was that you had come up with all these different strategies that were very specific and belonged to certain ... whether it be transportation, energy reduction, or a bunch of different strategies ... and then you had specified in the document kind of the leader of enacting that strategy and so it would be anything from the Burlington Electric Department to Parks and Recreation or Public Works ... and so I guess, when those leaders took responsibility for implementing the strategies ... was it that those leaders developed new offices or positions or was it a much more subtle integration into their already existing responsibilities in the city?

J: The Climate Action Plan didn't lead to anybody new being hired. So I would say, to answer your question, that anything in the Climate Action Plan was something the departments could or should under certain distinct circumstances, or maybe keep in mind with new hiring but they didn't hire anybody in specific to do anything in the plan per se.

P: Were the people who were responsible for developing the actual Climate Action Plan also the ones responsible for overseeing its implementation...?

J: Arguably, our Climate Action Plan doesn't have a whole lot of teeth because there wasn't any money associated with each proposed project or policy change or anything like that ... so each department is essentially responsible for these things and to be perfectly honest this is one of the challenges I think that cities that are just developing their climate action plans for the first time

⁸⁸ Jennifer Green is the Sustainability Coordinator of Burlington, VT.

need to consider is how are departments going to be held accountable and how are [they] going to be held accountable with change in city leadership? I mean arguably a lot of the things that are listed in our Climate Action Plan are indeed sort of happening, and I keep tabs on how we're sort of checking things off the list ... I think we had 33 or 38 key [inaudible] to the back of the plan ... but I would argue, people make general reference to it but I don't think that they when the department heads get together pull up the Climate Action Plan and make note of who's done what which month.

P: Is that just a sort of necessary consequence of the way city governments work or is that some sort of thing that you would rather be changed?

J: Yeah, I mean, ideally. [] have a strong mayor or a city council ... and I'm not saying we don't, we do, but they make it their priority to ensure that work is being done and reported back.

P: You had mentioned earlier that the plan sort of lacked teeth because there wasn't any kind of funding or budgeting stuff that was attached to the specific strategies ... Was that just something that was overlooked or is it just a very challenging thing to do for a city? Or would you recommend that a city that was just writing a Climate Action Plan try to attach budget figures to different strategies?

J: Yeah I mean I guess where possible. Again, it's just a way to make people feel accountable to making it come to pass. That said, I wouldn't want a city to hold back on doing a Climate Action Plan until they felt like they had all the financing lined up to make all these things happen.

...recording cuts off for a couple of minutes...

P: If you had to give advice or recommendations to a city starting from scratch in this process what advice would that be?

J: I think I would start by ensuring that the demand or request for the Climate Action Plan is coming from the highest level of government. It can certainly be generated by the public, but then ... you have to have political buy-in. If a community group, say, just says, well we're going to go do it and they either [inaudible] themselves or they hire a consultant to do it ... if it doesn't have the backing of government, if it doesn't stick somewhere in the government then the likelihood of a whole lot of progress being made is fairly slim. And I would also say, you can have a Climate Action Plan that's really detailed and gets into the weeds, or you can do a sort of higher-level activity which sort of looks generally at what your key sectors are that are responsible for GHG and then [build] something more simply are framing how to reduce them. It's really easy to get lost in the weeds and it's really important to at least start the process and have something. Once you have something then you can tweak it and change it and update it and all that. But I think, in the case of Burlington, we used the city of Chicago as a model, and we were so surprised when we looked at it that it was so simple ... we really wanted a meaty document. We found out at the end of the day that sometimes simple is best, because you can really ... I'm not saying the detail isn't important ... but you can get hung up on the details and then just not get anything done. You want a document with political and community buy-in that can serve as a vision for how to reduce emissions and mitigate the impacts of climate change.

And there are so many examples out there ... that's the other piece ... is you don't have to do this alone: there's so much material available.

Appendix B - Interview with Cori Burbach⁸⁹

Peter: How successfully do you think the city has been able to implement the strategies that went into the climate action plan?

Cori: I would say, just to give you a little bit of background on our plan, we wrote the plan in partnership with a local non-profit here in town, called Green Dubuque. They are an organization that is primarily a grassroots activist organization, but we have worked with them on our city's sustainability initiatives from the beginning, and they have a couple of members who have the technical expertise to write a plan like this. We actually partnered with them to write the plan and so we did the outreach strategy together and they did a lot of the technical component...that plan, which was written in 2011...it's very mitigation heavy, we're actually getting ready, once we hire my replacement, to do a new plan, we hope to incorporate adaption into that plan in a more intentional way, so the 50% by 2030 plan I have thought to be a very powerful document. The one thing I would say is it is a mitigation plan, primarily. We have had success in implementing that plan. The city council adopted it, and then, like many of the strategic or technical plans that we have in the city, implementation of that plan becomes the responsibility of our departments, where its city activity, but there's also a lot of recommendations in that plan that are for private sector or other organizations in the community. And so my role, as sustainability coordinator, was to reach out to partners on how to implement those recommendations, and had varying levels of success – obviously we've picked a lot of the 'low-hanging fruit' first, and we are making slow and steady progress towards those goals.

P: You mentioned, basically, that city departments were responsible for the implementation of different parts of the climate action plan. I don't know how much information you have on this or how easy it is to talk about, but I guess one thing Northfield cares about is how to take the structures and staff and organization they have in the city government and kind of build on that without sort of adding new positions in the city department.

C: Yes. That does make sense. I've been asked by others cities, "Well, what's the process for implementation?"...and because the plan is so all-encompassing...[] so from our perspective, I would point to two things that help keep us accountable for implementation of that plan...first is, our city council goes through a goal-setting process every year where they identify their top priorities for the upcoming fiscal year, and that process drives our budget then. So, if there are specific actions in that plan that need capital investment, as an example, the direction regarding those projects would come in that annual goal-setting process. For instance, last year city council identified the development of a community-wide solar strategy as one of their priorities, and so

⁸⁹ Cori Burbach is the assistant city manager of Dubuque, Iowa and the former sustainability coordinator

that addresses obviously, several pieces within the 50% by 2030 plan. But that was our direction as staff, specifically then to look at solar. Last year, city council identified the development of a new Citizen Advisory Commission, as a priority, the Resiliency Commission, and one of the responsibilities of that commission is to review the 50% by 2030 plan and give citizen input on what kind of progress we're making.

P: Do you think that the specificity of your plan, how detailed it is, helped the implementation process?

C: I do, yes. The specificity of it helps us to be very direct when we are looking at things but we also have a philosophy that says that other things are opportunities [or] come up that weren't in the plan, because technology didn't exist or you we, we didn't see the new business or anything like that...so we also try to recognize that there is going to be a lot of flexibility in taking advantage of opportunities

P: This might be too broad, but how did you approach the question of funding these new priorities or strategies with respect to the climate action plan?

C: It's definitely a tricky question to answer; it's one that I get a lot. And we don't necessarily have a pad of funds in our budget that says this much is for implementation of Climate Action Plan stuff. Again, where we would get funding would be through the Annual Council Goal-Setting Process - they designate a priority and we would put in a budget request from there. Now that being said there are larger items in there that are going to require more strategy...for instance, one of the biggest recommendations in our plan is investing a hydroelectric power plant on our [] dam on the Mississippi. We know that that's going to be a long-term strategy that's going to require multiple partners and outside funding and so we've started to talk to federal agencies that would be involved to ask them how we would go about doing that...if there are grants available or private companies that we could reach out to. Where we know there is going to be a larger investment we look at grant strategies and other ways that it could fund it.

P: I've read that some cities try to implement their Climate Action Plan somehow into their General Plan. Is that something you've considered or have opinions about?

C: We just finished an eighteen month process last year to update our community's comprehensive plan. That was a process that our planning department was in charge of implementing. We hired an outside consultant to help us in the community engagement process, and we were very intentional that everything that went into that plan came from citizen input. So that eighteen months we had 6,000 individuals who provided their ideas. When we scheduled the public meetings for that plan we scheduled them around our three sustainability pillars: environmental integrity, economic prosperity, and social-cultural vibrancy. And by doing that we got...in this instance probably the most relevant public workshop was the environmental integrity workshop. So we got a lot of input around the ideas that are in the 50% by 2030 plan. But it wasn't like we said "We are going to make sure that everything in our Climate Action Plan ends up in the comprehensive plan."

P: If you had to recommend best practices or any kind of similar thing to a city that is just starting from scratch in this process, what would that look like?

C: One of the things that I think has made us as successful as we have been is that we partnered with a local organization to do the plan. Cities write their plans in various ways. Sometimes it's in-house staff that write it. I know cities that have contracted with private companies who specialize in this work across the country. One of the things that I think can be a challenge when you contract with a large company who might have expertise in writing these plans but isn't from your community is that they write the plan and then they leave, and unless you have a really strong plan for implementation, whether it's city staff or in our instance we still have Green Dubuque that we partner with on these issues. I think it can be challenging to go from writing the plan to implementation. So having some connection locally is very important. And then I'd say for us, having that citizen advisory commission who is constantly looking back at the plan and checking it to see where we're at in terms of meeting our goals is important because there are so many things happening at the staff level and then at the city council level that to have that advisory commission in between the two keeps our eyes on the target.

Appendix C - Example Excerpt from Burlington CAP

COMMUNITY TRANSPORTATION	LEADER
Price parking to maintain 85% utilization - Increase parking rates to market-based rates and to maintain an 85% parking utilization rate. This action will better relate parking supply with demand, increase the likelihood of available spaces, reduce traffic congestion, improve air quality, and increase revenues for the City.	Dept. of Public Works
Develop infrastructure for fuel-efficient vehicles - This proposed action would develop infrastructure and incentives for fuel-efficient vehicles. This might include charging stations for electric and electric-hybrid vehicles and fueling stations for CNG and other alternative fuel vehicles.	Dept. of Public Works
Develop a Citywide Bike/Pedestrian Plan - This proposed action would build upon the City's North/South Bike Plan by taking a more comprehensive look at the City's existing bike/pedestrian infrastructure and designing and implementing necessary improvements.	Dept. of Public Works
GOVERNMENT TRANSPORTATION	LEADER
Develop a government alternative employee commuting program - Reduce government employee commuting miles by encouraging employees to commute through emissions-free modes (telecommuting, walking, and biking), as well as less impactful modes (car pooling, ridesharing, and mass transit). It would also include incentives such as a parking cash-out program.	City Green Team
Develop a government vehicle retirement and replacement program - Retire 5% of the government's vehicle fleet and replacing 25% of the gaso-line-powered vehicles with hybrids; retire twelve vehicles and replace 62 gas-powered vehicles with hybrids over a five year period.	Dept. of Public Works
Develop a government vehicle sharing/fleet management program - Includes vehicle acquisition, assignment and maintenance with a focus on cost -effectiveness and emissions reduction. Could also include other functions, such as vehicle financing, driver management, speed management, fuel management, health and safety management, regulatory compliance, and validating green initiatives.	Dept. of Public Works
LOCAL GARDENS, FARMS AND FOOD PRODUCTION	LEADER
Develop public-private partnerships and infrastructure to support processing, preserving and storage of locally produced foods - Develop public-private partnerships and infrastructure for the processing, preserving and storage of locally produced foods.	TBD
Create and implement a policy for raising non-domesticated animals - Create and adopt a clear and consistent policy for raising non-domesticated animals, for egg, meat, and milk production, in city neighborhoods and urban agriculture areas.	TBD
ENERGY EFFICIENCY IN BUILDINGS	LEADER
Require new residential construction to be Vermont Energy Star for Homes (VESH) qualified - Require new residential construction to be Vermont Energy Star for Homes (VESH) qualified. VESH are designed and built using best practices to save energy by reducing air leaks and thermal bypass, and by requiring high efficiency heating and appliances.	Burlington Electric Dept.
Fully implement BED Advanced Metered Infrastructure (AMI) program - BED is in the process of installing smart meters in all buildings in the City of Burlington. Smart meters will provide data to BED and its customers in 15 minute intervals, and offer two-way communication. This better data can then be used to achieve increased efficiency.	Burlington Electric Dept.
Require new commercial construction to follow Core Performance guidelines - Require new commercial construction to follow Core Performance guidelines, a program offered by BED, and Vermont Gas. Core Performance is a prescriptive guide to reduce energy use in commercial buildings by 20-30%.	Burlington Electric Dept.

Appendix D - Example Excerpt from Dubuque CAP

Local Clean Energy – Solar

1) Sector: Local energy - infrastructure

2) Policy name: Local clean energy - solar

3) Policy type: Municipal; Private Business; Utility; State/Federal

4) Affected entities: City of Dubuque; utility companies; local businesses; individuals

5) Current status: There are several installed and planned solar energy projects, including a 200 kW installation on the City of Dubuque Municipal Services Center. There are two locally owned and operated solar energy companies in Dubuque as of 2012.

6) Estimated GHG reduction: 9,618-28,854 mt CO₂e annually by 2030.

7) Scope of emissions reduction: Scope 1 (offset natural gas heating); Scope 2 (offset electricity)

8) Specific description of policy: The current economics and incentives surrounding solar PV create rapid returns on investment for business and commercial customers. Also, solar panels generate the most electricity in the middle of the day, when electricity demand typically is greatest and energy from the grid is most expensive to purchase. Also, solar systems are modular and can be expanded over time.

There are many opportunities for solar energy in Dubuque. One current project is a 200 kW facility installed on the Dubuque Municipal Services Center (the 3rd largest solar installation in Iowa as of 2011). The project is set up as a lease agreement, where the City owns the property and has agreed to pay 11 cents per kWh to Eagle Point Solar, who maintains the equipment and is responsible for lease payments to the bank that financed the equipment. Eagle Point Solar can utilize state and federal renewable energy incentives because it is a tax-paying entity. In total, grants and incentives have

reduced capital costs for the project from an initial \$1 million to \$350,000 (SCN 2011b). Financing and cost offsets like this are typical for commercial scale solar systems.

9) Barriers to implementation: Iowa utility monopoly rights and regulations; securing renewable energy grants/incentives; siting; securing financial backing.

10) Co-benefits: As grid electricity rates continue to rise, businesses that utilize PPAs/lease agreements will enjoy stable long term energy costs because energy generated is often sold at a flat, contracted rate. Other benefits include local jobs and economic growth, improved air quality, and reduced grid demand at peak loading times, when prices can be highest and less efficient power facilities are brought into operation. Reduced peak loads also can lower costs for utilities, allowing them keep rates low.

11) Explanation of GHG reduction impact: Eagle Point Solar, Blue Sky Solar, and Solar Planet (all of Dubuque) project the installation of 750 kW/year of solar PV for commercial sites and 50 kW/year at residential sites in Dubuque. We also project the installation of an average of 5 solar hot water systems per year between 2010 and 2030. At projected 2030 emission factors (Appendix A) this will reduce 19,236 mt CO₂e per year, with over 19,000 mt of this coming from solar PV. We assume a large margin of uncertainty (50%), yielding a range of 9,618-28,854 mt CO₂e per year.

12) Relative confidence of GHG reduction estimate: Low

13) Sources of uncertainty in GHG reduction estimate: GHG reduction per kW solar capacity is well known. However, future incentives for solar, future grid rates, and declines in the price of solar PV create uncertainty in future projections. Ultimate scale of solar installations by 2030 will vary significantly depending on these factors.

Appendix E - Example Excerpt from Seattle Implementation Strategy

	Action	Lead Dept	Other Dep'ts Involved	2013 Implementation Tasks	2014 Implementation Tasks	Needed Policy Decisions	Existing Resources	Needed Resources	Public Engagement
	Building Energy								
BE 1	Begin implementing a plan to deploy smart meters that provide real-time energy use information to all Seattle City Light customers.	SCL		Hire project manager, establish project team, hire expert educational consultant, develop workforce development plan for impacted employees.	Adopt health and privacy policies, develop a business case and submit a Budget Issue Paper, develop and issue a Request For Proposal for implementation.	Decision to proceed with implementation.	Strategic Plan includes placeholder for funding from 2015-2018.	Strategic Plan includes placeholder for funding from 2015-2018.	Community forums, outreach to businesses and organizations, website, surveys, info sheets/FAQs, e-bulletins, DON liaisons.
BE 2	Make the energy benchmarking scores of the City's municipal buildings publicly available.	OSE	FAS, Parks, Seattle Center, SPL, SDOT, SCL, SPU	1. Benchmark City buildings in accordance with, and beyond, the requirements of the City's Energy Benchmarking and Reporting Ordinance. 2. Produce an Energy Performance Report for municipal buildings and make it readily available to the public.	1. Benchmark City buildings in accordance with the requirements of the City's Energy Benchmarking and Reporting Ordinance. 2. Benchmark relevant City buildings less than 20,000 sf. 3. Produce an Energy Performance Report for municipal buildings and make it readily available to the public.	As part of Mayor's Office approval of the Resource Conservation Management Plan, determine whether municipal facilities should benchmark and report buildings below the 20,000 square foot requirement	\$7,500 in grant funds (2013) to develop the initial report format and content; OSE staff time to develop report; FAS, Parks, SC, SPL, SDOT, SPU staff time to benchmark buildings.	None	Press release, website.