Dear Susan:

As requested, I distributed for systemwide Senate review the revised Presidential Policy on Sustainable Practices. All ten Academic Senate divisions submitted comments. These comments were discussed at Academic Council’s December 15 meeting and are attached for your reference.

We understand that the revisions are intended to update and strengthen the University’s sustainability policies, goals, and procedures. The updated areas include requirements for building design and efficiency, criteria for the purchase of carbon offsets, and goals around sustainable transportation. The revisions also update sustainability goals for UC Health locations, add a reference to climate justice in campus climate action plans, and a new section on health and well-being.

In general, the Senate supports the policy revisions as a meaningful step toward stronger sustainability policies and practices. In particular, Senate reviewers appreciate the new emphasis on high-quality carbon offsets, sustainable transportation, environmental justice, telecommuting and flexible work schedules, and health and well-being. However, faculty are concerned that the policy does not go far enough to address the climate crisis, includes insufficiently aggressive and vague targets for eliminating campus use of fossil fuels, overemphasizes the role of carbon offsets, and lacks clear accountability and enforcement mechanisms around the sustainability goals.

I will summarize a few key points made in the attached packet of campus letters, but encourage policy authors to consider all suggestions carefully as they further refine the policy. Also note that several campus Senates recently commissioned new standing committees, task forces, and other groups to study energy, electrification, and sustainability issues. The attached packet contains several letters from these groups that offer particularly detailed and informed analyses of the policy through a climate activist lens.
First, the Senate encourages the University to prioritize the reduction of on-campus fossil fuel combustion and accelerate target dates for campuses to reduce carbon emissions, transition to renewable energy, and move to a carbon-free vehicle fleet.

The Senate appreciates the inclusion of new criteria to guide the University’s purchase of “high-quality” carbon offset credits, but we are deeply skeptical about offsets for several reasons. First, it is unclear that the criteria as written will ensure that UC can successfully identify and use high-quality offsets. More fundamentally, purchasing offsets should not be a long-term strategy to reduce emissions, given widespread concerns about their credibility and verifiability and their reputation as a dodge that merely shifts responsibility for reducing carbon emissions, and away from the real need to reduce overall fossil fuels consumption. At a minimum, the University should report publicly about how its purchased offsets meet the new “high quality” criteria in the policy. But the University should really focus on alternatives to meet its clean energy goals and turn to offsets only as a partial and temporary measure.

Similarly, we appreciate the Policy’s inclusion of increased targets for biogas combustion, but note that a common criticism of biogas is its use by the fossil fuel industry to extend the life of fossil fuel plants that should otherwise be retired. The University should tread cautiously here and consider as a more sustainable and credible longer term strategy the reallocation of money earmarked for offsets and generated by trading biogas credits, to planning for the electrification of the campuses.

In addition to stronger accountability and transparency mechanisms for offsets and biogas, the University should establish clear and accountable annual goals for decarbonization that carry real consequences if they are not met. It should make data and assessments about progress toward these goals accessible to all campus and community stakeholders.

The Senate appreciates the policy’s new emphasis on sustainable transportation options and telecommuting; however, faculty also observe that it will be difficult for UC to reduce single occupancy vehicle (SOVs) trips to campus, given the lack of public transportation and affordable housing options in UC campus communities. Another concern is that additional restrictions on SOVs could fall disproportionately on lower income students who are more likely to commute from far away. That said, there is a strong demand for campus-provided transportation options that can help reduce the need for SOV commuting. Reviewers also note that the policy does not address travel commonly required of faculty for professional activities, including airline travel.

The Senate is aware that transitioning the University to a more sustainable future on a faster timeline will not be inexpensive. Several reviewers observed that the proposal does not provide information on the budgetary impacts of implementing the actions outlined in the policy. In addition to a budgetary analysis, they recommend an ongoing assessment of budgetary performance against the policy. Faculty also emphasize that it would be shortsighted to consider only the short term, upfront cost of change, and not the longer term costs of doing nothing.

The letters from Senate reviewers also suggest many small but significant practices that would enhance sustainability, including electric vehicle charging stations, more reflective whiter paint for campus building exteriors, an assessment of energy used for IT functions, and a plan for electronic waste. They also suggest that the new section on Health and Well-being could be sharpened to better articulate the issues and provide guidelines for future policies. Finally,
reviewers suggest the addition of a biodiversity sustainability section that addresses campus biodiversity goals.

In short, the Policy is effective as an aspirational set of best practices that provides a strong foundation for sustainability, but more meaningful and aggressive actions are needed on a much faster timeline. The attached letters reflect the faculty’s urgent concern about the climate crisis and their enthusiasm for increasing the Senate’s role in addressing the crisis. There is already much great work underway at the University, but also a hunger for more visionary action. The global scientific consensus is that as much fossil fuel infrastructure as possible needs to be retired in this decade to have the biggest impact on climate protection. Faculty climate activists observe that being net carbon-neutral is no longer enough. They urge the University to become net carbon-negative—that is, to leverage its resources to help remove existing carbon dioxide from the atmosphere. The state is looking to UC for scientific, technological, and moral leadership on climate and sustainability issues. The University has an opportunity to leverage its leadership and expertise toward greater public support and funding around these goals.

The work of the Global Climate Leadership Council (GCLC) and the Systemwide Climate Resilience Planning project should inform further development of the policy. We look forward to working with you, CFO Brostrom, Director of Sustainability St. Clair, and the GCLC to identify additional options for enhanced systemwide Senate involvement in highlighting and addressing climate crisis issues on the campuses.

We appreciate the opportunity to comment. Please do not hesitate to contact me if you have additional questions.

Sincerely,

Robert Horwitz, Chair
Academic Council

Cc:  Director of Sustainability St. Clair
     Academic Council
     Campus Senate Directors
     Executive Director Baxter

Encl.
December 7, 2021

ROBERT HORWITZ  
Chair, Academic Council

Subject: Systemwide Review of Proposed Revisions to Presidential Policy on Sustainable Practices

Dear Chair Horwitz:

On November 29, 2021, the Council of the Berkeley Division (DIVCO) discussed the proposed revisions to the Presidential Policy on Sustainable Practices, informed by written comments from the Committee on Academic Planning and Resource Allocation (CAPRA).

DIVCO supports the revisions, and agrees with the concerns and recommendations described in CAPRA’s letter. There are two concerns at the level of guiding principles. First, the current draft does not sufficiently emphasize the need to reduce carbon emissions rapidly from campus heating and electrical systems, which account for the vast majority of UC’s “scope 1” (direct) emissions. Second, although it sets out the principle that the university “will only use high-quality offset credits” to meet its emission reduction goals, it does not ensure compliance with that principle.

Below is a summary of recommendations provided by CAPRA, which DIVCO endorses:

1. Prioritize effort and funding towards reducing the on-campus combustion of fossil fuels. We encourage accelerating the target date for decarbonization plans to 2025, or as soon as feasible.
2. Consider whether the call to achieve 40% on-campus biogas combustion by 2025 is feasible, and what the implications of failing to achieve it would be.
3. In the near term, the policy counts on the use of purchased carbon offsets to achieve carbon neutrality. Offsets should be verifiable, additional, and equivalent. We encourage the university to investigate and report on whether any offsets available for purchase meet those conditions, and to make information about purchased offsets publicly available.

Please see the enclosed committee letter for more specificity.

Sincerely,

Ronald C. Cohen  
Professor of Chemistry  
Professor of Earth and Planetary Science  
Chair, Berkeley Division of the Academic Senate

Enclosure

cc: Mary Ann Smart, Vice Chair, Berkeley Division of the Academic Senate  
Holly Doremus, Chair, Committee on Academic Planning and Resource Allocation  
Jocelyn Surla Banaria, Executive Director  
Deborah Dobin, Senate Analyst, Committee on Academic Planning and Resource Allocation
November 24, 2021

PROFESSOR RONALD COHEN  
Chair, Berkeley Division of the Academic Senate

Re: CAPRA comments on proposed revisions to the Presidential Policy on Sustainable Practices

At the November 17th CAPRA meeting, the committee discussed the updated Presidential Policy on Sustainability Practices. This memo is intended to provide some general comments on the policy through the lens of CAPRA’s charge to consider issues of academic planning, budget, and resource allocation. If DIVCO agrees with our comments, we ask that they be forwarded not only to the Academic Council but also to Chancellor Carol Christ, Vice Chancellor Marc Fisher, Associate Vice Chancellor Sally McGarrahan, and Chief Sustainability and Carbon Solutions Officer Kira Stoll.

CAPRA is grateful for the attention that has been given to developing and revising this policy. We understand that it deals with sustainability broadly, and in varying levels of detail. Much of it is admirable. However, we have two concerns at the level of guiding principles. First, the current draft does not sufficiently emphasize the need to reduce carbon emissions rapidly from campus heating and electrical systems, which account for the vast majority of UC’s “scope 1” (direct) emissions. Second, although it sets out the principle that the university “will only use high-quality offset credits” to meet its emission reduction goals, it does not ensure compliance with that principle.

Summary of Recommendations

1. Prioritize effort and funding towards reducing the on-campus combustion of fossil fuels. We encourage accelerating the target date for decarbonization plans to 2025, or as soon as feasible.

2. Consider whether the call to achieve 40% on-campus biogas combustion by 2025 is feasible, and what the implications of failing to achieve it would be.

3. In the near term, the policy counts on the use of purchased carbon offsets to achieve carbon neutrality. Offsets should be verifiable, additional, and equivalent. We encourage the university to investigate and report on whether any offsets available for purchase meet those conditions, and to make information about purchased offsets publicly available.
Energy Systems

Roughly 90% of the university’s “scope 1” emissions of carbon dioxide (i.e., emissions directly emanating from on-campus combustion of fossil fuels) stems from its ten methane-fired heat and power plants. Collectively, these emit about 1 million tons per year of heat-trapping carbon dioxide,\(^1\) making a substantial contribution to global warming.

The draft policy includes Clean Energy elements that will indirectly reduce scope 1 emissions, including calls to reduce energy use intensity by 2% annually and to install renewable energy facilities. However, the only short-term step called for to directly reduce emissions from existing campus energy plants is increased use of biogas. We do not oppose this measure, but view it as sufficiently impractical that it is unlikely to produce the results anticipated by the draft policy.

Biogas is methane derived from recently grown organic matter, e.g., as derived from anaerobic digestion of landfill waste. Unlike the burning of fossil methane, the burning of biogas does not add new carbon to the system and so does not contribute to global warming. The draft says that by 2025 “at least 40% of the [methane] combusted on-site at each campus and health location will be biogas.” Our concern is whether this can be achieved. It would require construction of new infrastructure for biogas delivery and storage on a rapid timeline. Even if it allowed purchase of biogas credits (so that biogas would be fed into the nation’s methane pipelines rather than delivered directly to university facilities), the costs might be extremely high. In either case, the anticipated reductions in carbon emissions might not be realized, since the policy (understandably) makes implementation “subject to the constraints of . . . budgetary requirements.”

It seems unwise, therefore, to rely on biogas substitution to reduce scope 1 emissions. We are disappointed with the timeline for implementing other measures. The current draft calls for each campus to complete an assessment of scope 1 emissions by 2035 (or sooner if power plants are due for major repairs or capital renewal) and at that point to determine the “best pathway . . . to decarbonize 80% of scope 1 emissions through means other than offsets.” We urge the university to consider whether the assessment date could be substantially moved up. We are concerned that delay may leave the university unable to react swiftly to potential near-term funding opportunities. To ensure prudent capital planning, and position the university as a leader on sustainability, we believe the timeline for identifying decarbonization plans for each location should be as aggressive as feasible.

Carbon Offsets

In 2013, the UC Office of the President announced the Carbon Neutrality Initiative, which “commits UC to emitting net zero greenhouse gases from its buildings and vehicle fleet by 2025.”\(^2\) Overestimating the ability to switch to biogas and delaying decarbonization of onsite energy facilities will increase the demand for offsets as a method of achieving carbon neutrality.

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\(^1\) https://electrifyuc.org/the-problem-with-methane/

\(^2\) https://www.universityofcalifornia.edu/initiative/carbon-neutrality-initiative/our-commitment
As has been widely reported, however, many existing carbon offsets suffer from problems of verifiability, additionality, and equivalence.

The proposed revision to the policy introduces new language regarding carbon offsets, with the laudable goal of ensuring that they produce intended climate benefits. Nonetheless, legitimate concerns remain as to whether the purchase of carbon offsets is a prudent use of university funds.

The proposed revisions require that the university use only “high-quality carbon offsets” (section V.C.9) that are enforceable, additional, and durable. We agree that these are all important characteristics (although we suggest use of the term “verifiable” rather than “enforceable”). We urge deeper consideration, however, of how high-quality offsets can be identified, and what each of the listed characteristics means. For example, we urge careful accounting of the potential for leakage. We also encourage evaluation of durability at timescales that match the residence time of fossil carbon in the atmosphere, which is several orders of magnitude longer than the 40 years specified by the draft policy. In order to truly “offset” fossil fuel emissions, offsets must sequester an equivalent amount of carbon for the entire length of the atmospheric residence time of the fossil carbon.

Finally, given the extent to which the draft policy will require reliance on offsets, we urge the Office of the President to investigate whether there are any carbon offsets available for purchase that meet the conditions of being verifiable, additional, and equivalent. Expenditures on offsets that fail one or more of these criteria would squander resources that could be better spent directly reducing the university’s scope 1 emissions.

Thank you for the opportunity to review this policy.

With best regards,

Holly Doremus, Chair
Committee on Academic Planning and Resource Allocation
Robert Horwitz  
Chair, Academic Council  

RE: Proposed Revisions to Presidential Policy on Sustainable Practices

Dear Robert,

The proposed revisions to the Presidential Policy on Sustainable Practices were forwarded to all standing committees of the Davis Division of the Academic Senate. Seven committees responded: Planning and Budget (CPB) and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Engineering (COE), the College of Letters and Science (L&S), the School of Nursing (SON), and the School of Veterinary Medicine (SVM).

Committees support the proposed revisions. COE notes that the policy reads as a set of best practices that are aspirational in nature, but the extent to which the best practices are actually followed is unclear. COE recommends that a “similarly comprehensive, point-by-point assessment of performance against the policy would be at least equally valuable.” Similarly, CPB was unclear on what kind of budgetary analysis was performed for these policy revisions; such budgetary and periodic life cycle analyses would help to “contextualize policy changes” and “provide a framework to understand what policy changes may be meaningful in the long term.”

The Davis Division appreciates the opportunity to comment.

Sincerely,

Richard P. Tucker, Ph.D.  
Chair, Davis Division of the Academic Senate  
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Hilary Baxter, Executive Director, Systemwide Academic Senate
Richard Tucker  
Chair, Davis Division of the Academic Senate

RE: Proposed Revisions to the Presidential Policy on Sustainable Practices

The Committee on Planning and Budget (CPB) has reviewed and discussed the Proposed Revisions to the Presidential Policy on Sustainable Practices. This policy has been reviewed annually since 2004, so the proposed revisions represent incremental updates approved by the Sustainability Steering Committee. The policy revisions strike the balance between flexibility and specificity, setting aspirational sustainability goals for each campus and health system to work toward within their limited resources. CPB supports the proposed revisions and offers the following comments for further consideration:

1. While the policy cover letter explains that the proposed revisions are the result of systemwide working groups (consisting of one or more stakeholders from each campus and health system) making recommendations to the Sustainability Steering Committee, it would be helpful if there was more information about these working groups to ensure that consultation included the stakeholders whom these proposed revisions would most affect. For example, CPB agreed that consulting with campus leadership in facilities management and design construction would be necessary for these annual policy updates, as they would be able to speak to the potential impacts of proposed changes.

2. Though it appears that Vice Chancellors for Administration and Chief Operating Officers from each campus and health system serve on the Sustainability Steering Committee, it was unclear to CPB what kind of budgetary analysis was performed to ensure the economic sustainability of these policy revisions. CPB members suggested that it would be helpful to include periodic life cycle analyses to contextualize policy changes. While the committee understands that the benefits of these changes may be difficult to measure, these data would provide a framework to understand what policy changes may be meaningful in the long term. CPB also noted that demonstrating savings and other benefits of achieving sustainability goals may help fundraising efforts.

3. For clarity and consistency, the policy document should either include or consistently strike past deadlines.

CPB appreciates the opportunity to comment.
Proposed Revisions to Presidential Policy on Sustainable Practices

FEC: College of Agricultural and Environmental Sciences Committee Response

November 19, 2021

The Faculty Executive Committee of the College of Agricultural and Environmental Sciences (CA&ES) discussed the Proposed Presidential Policy on Sustainable Practices at its regular meeting on 26 October 2021. The committee is supportive of the proposal. We are also aware of the UC-wide Climate Resilience Planning effort currently underway, and we suggest that this committee’s work be considered in further developing this plan to move beyond sustainability to incorporate climate resilience.

The CA&ES faculty appreciates the opportunity to comment.
November 10, 2021

Richard Tucker
Chair, UC Davis Division of the Academic Senate

**RE: Proposed Presidential Policy on Sustainable Practices**

Dear Richard,

The Faculty Executive Committee of the College of Biological Sciences has reviewed the request for consultation regarding the Proposed Presidential Policy on Sustainable Practices. We support these policy changes and hope that the UC will set even more ambitious sustainability goals in the future. In the meantime, as an utterly mundane but meaningful contribution to sustainability, we would welcome the introduction of separate receptacles for compostable waste in university buildings.

The CBS FEC appreciates the opportunity to comment on this proposal.

Artyom Kopp
On behalf of the CBS Faculty Executive Committee
Proposed Revisions to Presidential Policy on Sustainable Practices

FEC: College of Engineering Committee Response

November 19, 2021

The College of Engineering Faculty Executive Committee discussed the Presidential Policy on Sustainable Practices and its proposed 2021 revisions at its regular meeting on Nov. 3, 2021. No particular concerns were raised by the FEC as a result of this review. However, the Engineering FEC conveys the following observations:

1. Taken as a whole, the policy reads as a comprehensive set of "best practices," though many of its provisions are stated as commands ("The University will. . ."). What is less clear is the extent to which these best practices are actually followed, and the enforcement mechanisms that attend them. In this sense, the policy is perhaps properly regarded as aspirational in nature. The University rightly prides itself on its commitment to environmental protection in all its various aspects, but aspirations and policy goals are only one side of the equation. A similarly comprehensive, point-by-point assessment of performance against the policy would be at least equally valuable.

2. Some of the policy provisions, while advancing a green agenda, could be regarded as counterproductive in relation to the University's core functions. For example, some FEC members noted that flexible work hours, if widely implemented, could degrade both teaching and research activities. However, the Committee was quick to agree that not everyone needs to drive to campus. Long-term investments in remote parking arrangements, electric shuttle buses, and robust public-transportation interfaces should be part of the strategic picture.

The College of Engineering faculty appreciates the opportunity to comment.
Proposed Revisions to Presidential Policy on Sustainable Practices

FEC: School of Nursing Committee Response

November 19, 2021

We support the proposed revisions to the Presidential Policy on Sustainable Practices. It might be informative to provide an overall metric of the UC Davis carbon footprint and how much that footprint is being reduced each year based on policy and behavior.
November 24, 2021

Robert Horwitz  
Chair, Academic Council

RE: Proposed Revisions to the Presidential Policy on Sustainable Practices

At its meeting on November 16, 2021, the Senate Cabinet reviewed the proposed revisions to the presidential policy on sustainable practices. The Council on Planning and Budget (CPB) and Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) also reviewed the proposed revisions.

Overall, members endorsed the proposed revisions and found the policy’s goals laudable. However, both CPB and CFW noted that the proposal does not provide any information on costs of implementation. CFW provided several additional recommendations and points of clarification in its written response.

The Irvine Division appreciates the opportunity to comment.

Sincerely,

Joanna Ho, Chair  
Academic Senate, Irvine Division

Encl.: CPB, CFW memos

Cc: Georg Striedter, Chair Elect  
    Gina Anzivino, Interim Executive Director
November 9, 2021

JOANNA HO, CHAIR
ACADEMIC SENATE, IRVINE DIVISION


At its October 13, 2021 meeting, the Council on Planning and Budget (CPB) discussed proposed updates to the existing Presidential Policy on Sustainable Practices.

The revisions update specific targets and add additional requirements to green building design, climate protection, transportation, water systems, and UC Health.

Overall, the Council endorsed the spirit of the proposed revisions. UC policies and practices must reflect values of planetary stewardship.

The Council offers the following comments:

- The proposal does not provide any information on cost. Efforts should be made to provide a quantitative estimate of cost to truly commit to making the UC more sustainable. Given the Council’s remit on planning, members suggested that estimates may be extrapolated from prior policy adjustments. Without such information, the Council is unable to meaningfully evaluate the proposed revisions.
- It is unclear how the changes will be implemented. If there is a policy recommendation, there should be agreement on what the goals should be.
- Members noted questionable language such as “subject to changes” which dilute the policy.
- Additional clarification is needed on when to spend more versus less.

On behalf of the Council,

Alyssa Brewer, Chair

CC: Gina Anzivino, Associate Director, Academic Senate
    Michelle Chen, CPB Analyst
Re: Systemwide Review of Proposed Revisions to the Presidential Policy on Sustainable Practices

Systemwide Academic Senate Chair Horwitz forwarded for review proposed updates to the existing Presidential Policy on Sustainable Practices.

The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) discussed this issue at its meeting on October 12, 2021. However, it became apparent during the discussion that members did not feel they had sufficient expertise to review the proposed policy revisions. It was suggested that CFW ask members of the upcoming ad hoc Climate Crisis Committee to review and provide comments and recommendations. The comments have been combined below.

Overall:

- All of the specific policies and goals pertaining to sustainable practices are laudable. There is little information, however, about how they will be funded.

- It generally aims to make UC a leader. Nonetheless, what defines leadership in some areas is unclear one might argue for more aggressive targets in others.

- So glad to see a focus on campus sustainable transportation programs to promote telecommuting opportunities.

By Section:

III.A “Green Building Design”

1. Under section A.1.e about lab buildings, why not also strive for LEED Gold as with the other new buildings?

III.B “Clean Energy”

1. This section should add a provision to require campuses by 2023 to create plans with targets and timelines for decommissioning or decarbonizing natural-gas fired power and steam generation. 40% renewable biogas is by 2025 is not sufficient for the UC to achieve its climate goals because the other 60% will need to be offset and there is still potential for methane leakage with high greenhouse warming potential.
III.C Policy on “Climate Protection”

1. P2-15: missing the word “levels” in “c. Maintain greenhouse gas (GHG) emissions at or below 1990 levels”.
2. P2-16: The added guidelines on “carbon offsets” greatly strengthen the Climate Protection policy and make the policy more complete.

III.D “Sustainable Transportation”

1. In section D.1, specify by what date 100% of vehicle acquisitions will be zero-emissions
2. In section D.1.e, the aim should be to exceed (not just meet) state targets. It is possible that the state targets will become more stringent and the University should be prepared to meet stronger targets.
3. For section D.2, it would be good to add targets for vehicle miles traveled as well as % of employees and students. From a sustainability and productivity perspective, it might be worth prioritizing reductions in long commutes. Also, define what these percentages mean. If a single employee commutes by SOV 3 days/week instead of 5, is that the same percentage reduction as going from 5 to 3 employees that commute by SOV every day?
4. The section D.4 targets for ZEV commuting are weak. We’ve probably already met the 4.5% target. Automakers are vowing to stop producing gas-powered vehicles by 2035. I’d suggest a 10% target by 2025 and 90% by 2050.

III.F “Zero Waste”

1. Section F.1.b mentions 90% landfill diversion. That’s not zero waste, that’s 10% waste. Could we aim for 100% landfill diversion?
2. Section F.3: include targets and timelines for reducing lab and medical packaging, e.g. 90% reduction by 2030.
3. Section F.4.e: add timeline and targets for the phase-out. By what year will plastic beverage bottles be gone from campus vendors? How about 2025?
4. 1. P2-19: 4.a “Eliminate plastic bags in all retail and foodservice establishments in campus facilities or located on University owned land no later than January 1, 2021”.
5. 2. P2-19: 4.b. “Replace disposable single-use plastic foodware accessory items in all foodservice facilities with reusables or locally compostable alternatives and provide only upon request no later than July 1, 2021.”

III.I “Sustainable Water Systems”

1. P2-21: “1. Locations will reduce growth-adjusted potable water consumption 20% by after 2020, and 36% by 2025, when compared to a three-year average baseline of FY2005/06, FY2006/07, and FY2007/08.”

III.J “Sustainability at UC Health”

1. P2-24: “3. In line with campus targets, health locations will reduce growth-adjusted potable water consumption 20% by after 2020 and 36% by 2025, when compared to a three-year average baseline of FY2005/06, FY2006/07, and FY2007/08.”
V.C Procedure on “Climate Protection”

1. P2-33&P2-34: There is no mention of the priorities laid out in the policy section (III.C.2) for “carbon offsets”. Section III.C.2 should be cited or referred to somewhere in this procedure section.

2. P2-34: Suggest mentioning the priority policy in the following statement: “h. Decisions affecting offset procurement will be made in the context of the location's climate action plan while following the offset priorities (Section III.C.2) and requirements set forth in this Policy.”

V.F “Zero Waste”

1. For section F.7, why are construction, landscaping, and agricultural waste excluded from the policy? These are potentially large sources of waste that should be addressed; this is a big loophole.

V.A “Green Building Design”

1. In subsection 1.b, documenting compliance is detailed, but not mention is made of enforcing that compliance.
2. In subsection 1.e.iii, is cost-effectiveness the only criterion needed?
3. In subsection 1.f, “Table 2” should be capitalized
4. In subsection 1.g, the two lines off-setting lists (that each begin with “Projects are . . .” and “The following very . . .,” respectively) need to be consistent in spacing and use of colon to off-set the lists below them.
5. In subsection 1.h, “are encouraged” could be revised to include accountability
6. In subsection 3.a, “listing” should just be “list”
7. In subsection 5.a, specify with whom the “best practices” should be share (internally within schools and/or centers; to other campuses, etc)
8. In subsection 5.d, space needed between “I2SL” and “the”

V.B “Clean Energy”

1. In subsection 1, “US” should be “U.S.” for consistency with previous paragraph
2. In subsection 2.b, To what end do locations periodically evaluate feasibility? Is there a mechanism for checking on whether locations are doing so and/or doing anything about their findings?
3. In subsection 3.b, cut “on” to read simply “reported annually.”

V.C “Climate Protection”

1. In subsection 3, “gasses” should be “gases”
2. In subsection 5, line 2, cut additional space after “levels”
3. Also in subsection 5, last item in list doesn't read correctly: should be revised to read “(d) integrating considerations of environmental justice, adaptation, and resilience.” That said, the last two terms are vague and should be specified.
4. In subsection 9.a.i, there needs a period at end of sentence
Sincerely,

Terry Dalton, Chair
Council on Faculty Welfare, Diversity, and Academic Freedom

C: Gina Anzivino, Associate Director
   Academic Senate

   Matthew Hurley, Cabinet Analyst
   Academic Senate
December 6, 2021

Robert Horowitz  
Chair, UC Academic Senate

Re: Proposed Presidential Policy on Sustainable Practices

Dear Chair Horowitz,

The Divisional Executive Board, councils, and committees appreciate the opportunity to review the Proposed Presidential Policy on Sustainable Practices. The Executive Board reviewed the proposal and divisional council and committee feedback at its meeting on December 2, 2021.

Members generally supported the proposed policy although they questioned whether the proposal goes far enough to address the climate crisis. While the proposed policy places constraints on use of carbon offsets, it does not appear to move far enough to eliminate use of fossil fuels. Members appreciated the effort to rein in the volatile market of carbon offsets, but did not want UC to ignore the more fundamental effort to reduce fossil fuel use. Members also noted the importance of incorporating faculty research expertise into any implementation process. Overall, members suggested the policy proposal would benefit from more concrete and actionable rather than aspirational goals.

Sincerely,

Jody Kreiman  
Chair  
UCLA Academic Senate

Cc: Jessica Cattelino, Vice Chair/Chair Elect, UCLA Academic Senate  
    Shane White, Immediate Past Chair, UCLA Academic Senate  
    April de Stefano, Executive Director, UCLA Academic Senate
November 21, 2021

Jody Kreiman
Chair, Academic Senate

Re: Systemwide Senate Review of Proposed Presidential Policy on Sustainable Practices

Dear Chair Kreiman,

The Council of Faculty Chairs reviewed the Proposed Presidential Policy on Sustainable Practices at their November 18, 2021 meeting. Members unanimously agreed that the steps summarized in the policy seem reasonable, but the targets neither go far enough to address the issues nor have sufficient built-in accountability. Members urged the university to elevate goals for fossil fuel emission reductions relative to carbon reduction alone.

Sincerely,

Jody Kreiman
Chair
UCLA Academic Senate

Cc: Jessica Cattelino, Vice Chair/Chair Elect, UCLA Academic Senate
    Shane White, Immediate Past Chair, UCLA Academic Senate
    April de Stefano, Executive Director, UCLA Academic Senate
November 8, 2021

To: Jody Kreiman, Chair, UCLA Academic Senate

From: Leah Lievrouw, Chair, Graduate Council

Re: Systemwide Senate Review: Presidential Policy on Sustainable Practices

At its meeting on October 22, 2021, the Graduate Council reviewed and discussed the Presidential Policy on Sustainable Practices.

Members found the policy to be straightforward and wondered whether and how sustainable water practices might influence landscaping at the campuses. Members inquired whether there are mitigation strategies and water controls being considered at the campus level. Some members were concerned about the campus look and feel since students respond well to manicured outdoor spaces.

Thank you for the opportunity to opine. If you have any questions, please contact us via Graduate Council Analyst, Estrella Arciba, at earciba@senate.ucla.edu.
October 21, 2021

To: Jody Kreiman, Chair, UCLA Academic Senate

From: Kathleen Bawn, Chair, Undergraduate Council

Re: Systemwide Review of Presidential Policy on Sustainable Practices

At its meeting on October 15, 2021, the Undergraduate Council discussed the proposed revisions to the Presidential Policy on Sustainable Practices.

Members addressed several areas of the proposal warranting further consideration. Specifically, members noted that the policy raises ambitious goals for commuting, and asked whether it was realistic to lower the target percentage of single-occupancy vehicles alongside a projected increase in transfer student enrollment. Members agreed that single-occupancy vehicles should be considered alongside low-emissions vehicles when outlining sustainability targets. Members also encouraged the proposers to address improvements to bicycle infrastructure, which seem to be overlooked in the current report. Some expressed concern at the University’s previous failures to achieve waste reduction targets, and recommended the implementation of more rigorous accountability metrics and mechanisms to ensure that sustainability goals will be met.

Thank you for the opportunity to opine. If you have any questions, please contact us via the Undergraduate Council’s analyst, Julia Nelsen, at jnelsen@senate.ucla.edu.

cc: April de Stefano, Executive Director, Academic Senate
Jessica Cattelino, Vice Chair/Chair Elect, Academic Senate
Julia Nelsen, Committee Analyst, Undergraduate Council
Shane White, Immediate Past Chair, Academic Senate
October 26, 2021

Jody Kreiman, Chair
Academic Senate

Re: (Systemwide Senate Review) Proposed Presidential Policy on Sustainable Practices

Dear Chair Kreiman,

At its meeting on October 25, 2021, the Council on Planning and Budget (CPB) had an opportunity to review the Proposed Presidential Policy on Sustainable Practices. Members offered the following comments.

Members expressed that many of the stated goals seem fine on paper but may prove complex to implement, such as reducing travel to campus by single occupancy vehicles. Similarly, members would have liked to see the proposed policy include language about relying on faculty expertise from the various UC campuses, and not limiting the scope of consultation to administrative experts. A few members highlighted section 3B under “Sustainable Food Services” which singles out candy and chocolate (page 40), commenting that it is not necessarily a great use of people’s time penalizing these foods.

Finally, other members expressed that the document was written with good intentions but that many aspects of the policy are wishful thinking, as evidenced by the language used throughout.

If you have any questions for us, please do not hesitate to contact me at eblumenb@ucla.edu or via the Council’s analyst, Elizabeth Feller, at efeller@senate.ucla.edu.

Sincerely,

Evelyn Blumenberg, Chair
Council on Planning and Budget
cc: Jessica Cattelino, Vice Chair/Chair-Elect, Academic Senate
    Shane White, Immediate Past Chair, Academic Senate
    April de Stefano, Executive Director, Academic Senate
    Elizabeth Feller, Assistant Director, Academic Senate
    Members of the Council on Planning and Budget
December 7, 2021

To: Robert Horwitz, Chair, Academic Council

From: LeRoy Westerling, Chair, UCM Divisional Council

Re: Proposed Revisions to Presidential Policy on Sustainable Practices

The proposed revisions to the Presidential Policy on Sustainable Practices were distributed for comment to the Merced Division Senate Committees and the School Executive Committees. The following committees offered several comments for consideration. Their comments are appended to this memo.

- Graduate Council (GC)
- Faculty Advisory Committee on Sustainability (FACS)
- School of Social Sciences, Humanities, and Arts Executive Committee (SSHA EC)

GC endorsed the proposed revisions. The Council’s comments specifically pertaining to UC Merced are appended to this memo.

FACS considered the revisions in light of the policy as a whole and also the UC Policy on Integrated Pest Management. The committee had four main comments (additional comments and line edits are appended to this memo):

1. While aspects of biodiversity appear in the plan under various topics — for example the benefit of drought tolerant plants for reducing water usage — these are always incidental. The revised policy therefore lacks “Policy Text” and “Procedures” for a fundamental target area: biodiversity.

2. In recent years, a dichotomy has emerged among UC advocates of ‘carbon free’ versus ‘carbon neutral’ climate solutions. This juxtaposition is unlikely to be resolved by the current policy wherein plans to decarbonize fleet extend out as far in the future as 2045. We suggest there is a third solution which recognizes [i] the need to do more sooner and [ii] the substantial inertia intrinsic in existing infrastructure. This third solution, which can be referred to as ‘carbon negative’ for simplicity, recognizes the need to not only reduce and zero-out carbon emissions but to also start removing carbon from the atmosphere, and can be attained through a variety of natural in situ (see #2 above) and economic (e.g. offsets), and, in the future, technological solutions.

3. The offset language overall appears to treat offsets as a fallback strategy or option of last resort. But other forward-looking efforts e.g. carbon capture could be more central to sustainability strategies. In other words, most of the policy’s efforts are aimed towards limiting the negative, but not promoting
positive action.

4. It has been brought to FACS’ attention that some members of the GCLC discussed in that V.C.6 should include Climate Action plans that include a pathway to decarbonization without offsets. The date is currently as late as 2035, and it seems appropriate to develop the ‘carbon free’ plan now, along with a ‘carbon negative’ plan, even if the ‘carbon free’ plan is not implemented until 2035.

SSHA EC heartily supports this policy and is particularly pleased that a section on health and well-being has been added to the conceptualization of sustainability.

Divisional Council reviewed the committees’ comments via email and supports their various points and suggestions.

The Merced Division thanks you for the opportunity to comment on this proposed policy.

CC: Divisional Council
Hilary Baxter, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Senate Office
OCTOBER 22, 2021

TO:       LEROY WESTERLING, CHAIR, DIVISIONAL COUNCIL

FROM:    ERIN HESTIR, CHAIR, GRADUATE COUNCIL

RE:       PROPOSED PRESIDENTIAL POLICY ON SUSTAINABLE PRACTICES

Graduate Council (GC) has reviewed the proposed revisions to Presidential Policy on Sustainable Practices, and is pleased to endorse the proposed revisions. Specifically for UC Merced, GC wishes to address the following:

- As the recent campus survey shows, there is a high demand for campus-provided transportation that would reduce the need for single-occupant vehicle commuting. GC encourages the campus to expand the current services to offer more frequent campus shuttles that reach a wider area of Merced county including Atwater.

- As the campus considers new student housing projects, we also urge holistic planning that considers transportation as a critical design element.

Graduate Council appreciates the opportunity to opine.

CC:       Graduate Council
                      Senate Office

Enclosure: 0
23 November 2021

Faculty Advisory Committee on Sustainability Comment on Presidential Policy on Sustainable Practices

Dear Chair Westerling,

Thank you for the option to comment on the revisions to the Presidential Policy on Sustainable Practices (PPSP), and for collating these responses. The Faculty Advisory Committee on Sustainability (FACS) considered the revisions in light of the PPSP as a whole and also the recently released UC Policy on Integrated Pest Management (UCPIPM) on which we also comment separately. Four main comments are provided below, and followed by several more specific questions or comments and line-edits.

Sincerely,

Michael N Dawson

Chair, and on behalf of, FACS

(1) While aspects of biodiversity appear in the plan under various topics — for example the benefit of drought tolerant plants for reducing water usage — these are always incidental. The revised PPSP therefore lacks “Policy Text” and “Procedures” for a fundamental target area: biodiversity. Biodiversity is the defining attribute of this planet that has made it, and can keep it, habitable and hospitable. As a new “Health and Wellness” section was added this year, we suggest also development of a biodiversity sustainability section that incorporates all UC’s properties — not limited to the UC Natural Reserve System, which addresses some biodiversity goals in part — including the enrichment and replacement of non-native campus landscaping with locally relevant California natives.

(2) In recent years, a dichotomy has emerged among UC advocates of ‘carbon free’ versus ‘carbon neutral’ climate solutions. This juxtaposition is unlikely to be resolved by the current policy wherein plans to decarbonize fleet extend out as far in the future as 2045. We suggest there is a third solution which recognizes [i] the need to do more sooner and [ii] the substantial inertia intrinsic in existing infrastructure. This third solution, which can be referred to as ‘carbon negative’ for simplicity, recognizes the need to not only reduce and zero-out carbon emissions but to also start removing carbon from the atmosphere, and can be attained through a variety of natural in situ (see #2 above) and economic (e.g. offsets), and, in the future, technological solutions. Thus, a carbon negative policy can be implemented immediately, while the move to carbon free continues at a manageable pace.

(3) Building on #2, The offset language overall appears to treat offsets as a fallback strategy or option of last resort. But other forward-looking efforts e.g. carbon capture could be more central to sustainability strategies. In other words, most of the policy’s efforts are aimed towards limiting the negative, but not promoting positive action. For example, the only mention of carbon capture is that its feasibility should be assessed as part of assessment of Scope 1. Is that enough?
On related lines, it has been brought to our attention that some members of the GCLC discussed in that V.C.6 should include Climate Action plans that include a pathway to decarbonization without offsets. The date is currently as late as 2035, and it seems appropriate to develop the ‘carbon free’ plan now, along with a ‘carbon negative’ plan, even if the ‘carbon free’ plan is not implemented until 2035.

Additional comments and questions

Definitions

The document defines Climate Neutrality. Is this the same as Carbon-Neutrality? If so, carbon neutral policies can be easily mistaken for carbon zero policies and vice versa, but they are quite different. Carbon neutral policies place carbon offsets in a central role, whereas carbon zero policies rely on offsets as a fallback. Because the role of offsets in the document appear to be more as a fallback strategy rather than a preferred strategy, it may be helpful to more clearly define which practices fall under the guise of carbon neutrality and which fall under the guise of carbon zero.

“High-quality carbon offsets” has a definition with seemingly a lot of latitude; it is defined as an Additional, Durable, Enforceable offset. Durable: (high likelihood the offset will remain out of the atmosphere for 40 years or through commitments to replace credits) seems very nebulous. What is a high enough likelihood? How are commitments enforced?

Food service: It is not clear whether or not third party food trucks fall under this definition. Specifically the definition uses the term ‘establishments’ which may not capture mobile services, but should it?

Sustainable Transportation

While the goals for reducing SOV commuting are stated, there isn’t any mention of promoting alternative green transportation options. If SOV is reduced, it has to be replaced with something else, and whatever replaces it should be carbon-zero. Providing incentives for carbon-zero replacement options (for example, bicycle access to campuses) would seem to be an important missing piece.

There is no mention of green alternatives such as bicycle access in the Sustainable Transportation section.

DEI - if a larger proportion of under-represented students rely on SOV commuting, how do we reduce this option while maintaining campus access to groups that may be disproportionately impacted? Should there be checks and balances for how reducing SOV commuting intersects with equity?

Other

The document does not address changes to sustainability policies introduced by the COVID pandemic. In
anticipation of future pandemics, should there not be strategies in place to allow continuance of sustainability practices even under these conditions? For example, with respect to disposables and waste, where sustainability efforts were dropped to deal with the pandemic ... as such crises are anticipated again, we should have policies in place that take those conditions in mind.

**Line edits**

P2 – P6 – Plastic bags => should include only naturally compostable items; there should be no petroleum sourced or ‘industrial’ compostable bags. Strategies including reduction and re-usable bags are under-valued.

P12 – C.1.c => does this change indicate we did not meet this goal? The removal of a date by which to achieve the goal is problematic. This comment applies throughout the document where dates are removed.

P13 – D.1.e => Why cannot the transition to new vehicles be set for 2035 be brought forward 10 years? And correspondingly advance the 2045 date?

P15-16 – F4 => UC Merced campus is already out of compliance with single use plastics mandates.

P19 – H.1.a & 2.a => what is the definition of sustainable? In addition to prioritizing plant-based foods, these should also be organically sourced, and local.

P20 – I.1.a => replace “including California natives” with “especially California natives”

Section III.F.3. deleting “will” leaves the sentence without a verb, so do not delete “will” in this case:

1. “By 2020, the University will prohibit the sale,
To: Leroy Westerling, Chair, DivCo
From: Susan Amussen, Chair, SSHA EC
Re: Presidential Policy on Sustainable Practices

We heartily support this policy; we are particularly pleased that a section on health and well-being has been added to the conceptualization of sustainability. We realize our campus has done many things that move us toward these goals. However, we want to note that the campus and the Merced community will have to make significant investments in public transportation to move toward the decrease in the percentage of SOV use.
November 10, 2021

Robert Horwitz, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Proposed Presidential Policy on Sustainable Practices

Dear Robert,

I write to provide the Riverside Division’s response to Proposed Presidential Policy on Sustainable Practices that the Riverside Executive Council discussed on November 8, 2021 with no additional comments to the attached local committee memos.

Sincerely yours,
/s/ Jason
Jason Stajich
Professor of Bioinformatics and Chair of the Riverside Division

CC: Hilary Baxter, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office
October 27, 2021

To: Jason Stajich, Chair
   Riverside Division

From: Chandra Reynolds, Chair
   Committee on Physical Resources Planning


The Committee on Physical Resources Planning reviewed the Proposed Presidential Policy on Sustainable Practices and offer the following comments:

With respect to “Green Building Design”, a tangible way in which UCR could further enhance their leadership in sustainable buildings would be to add greater detail to the requirement for “cool roofs”, that may be part of the extant CA building code. To be more ambitious, a further requirement to the “whiteness” of the paint may add a lot of value for negligible cost. [c.f. https://pubs.acs.org/doi/10.1021/acsami.1c02368 and popular press explanation here: https://www.purdue.edu/newsroom/releases/2021/Q2/the-whitest-paint-is-here-and-its-the-coolest.-literally..html]

The description of the CBC requirements for new buildings and major renovations would benefit from clarification (document page 9 of 43; section A.1.a): i.e., a clearer statement that exceeding 20% is required whereas exceeding 30% is a goal. Added clarity here will avoid possible confusion in Section V.A.1.b (document page 21 of 43), where it is stated that new buildings and major renovations must “outperform CBC energy efficiency standards by at least 20%”.

A minimum indoor air quality standard should be described. This is interconnected with sustainability, health and well-being, and climate/environment on page 22 of the PDF, section L. Health and Well-being” (document page 19 of 43). Co-benefit solutions should be sought. Overall, Section L was positively viewed as potentially impactful. However, policy goal 1 is so broad that almost any work conducted by the Healthy Campus Network (HCN) will be viewed as a success. Thus, some refinement and specifics would be helpful, such as that suggested with respect to an indoor air quality standard. Health equity should be defined in the document.

Does the "parking management and pricing strategies" in Section IV.D.4 and IV.D.8.b. consider the potentially uneven burden of aggressive pricing on students who commute and are unable to utilize alternative modes of transportation; or on students who live on campus, but depend on single occupancy commuting to get to off-campus jobs or continuing medical care; or, is this covered by financial aid, and not in the form of student loans?
October 29, 2021

To: Jason Stajich, Ph.D., Chair, Academic Senate, UCR Division

From: Declan McCole, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine


Dear Jason,

The SOM Faculty Executive Committee has reviewed the Proposed Presidential Policy on Sustainable Practices. We approve of the policy and have the following additional comments for consideration. The Committee offered feedback that there is no incentive for anyone who drives an electric car. The charging stations are few and far between and they charge too much to charge one’s car.

Possible solutions/incentives to EV cars for UC students, faculty, and staff could include:

1. Add more charging stations.
2. Add fast charging stations, perhaps inviting Electrify America and Tesla to add a few at their own cost (hence one would need only 10-30 min to recharge). Users would have their own paying plans with those companies, this in theory would be at zero cost to UC.
3. Include a daily parking pass with the cost of the EV charging and/or provide discounted parking passes for EV vehicles (follow same CA rules used for HOV stickers for example).
4. The current rate of 0.75/hr (UCR level II stations provide max 6-7 kWh depending on the car – some cars can only draw max 3 kW per hour) is at the best similar to the one offered at UCSD ($0.15 per kWh). However it jumps to $0.5-0.6 per kWh after 2 hours. At UCSD it is constant at $0.15/kWh. The UCSD pricing seems more reasonable and fair (pay for what you draw).

Yours sincerely,

Declan F. McCole, Ph.D.
Chair, Faculty Executive Committee School of Medicine
November 23, 2021

Professor Robert Horwitz  
Chair, Academic Senate  
University of California  

Re: Divisional Review of Proposed Revisions to Presidential Policy on Sustainable Practices

Dear Professor Horwitz,

The proposed revisions to the Presidential Policy on Sustainable Practices were distributed to San Diego Divisional Senate standing committees and discussed at the November 8, 2021 Divisional Senate Council meeting. Despite strong reservations expressed by various committees, Senate Council chose not to raise objections to the proposal. However, the Council provided the following comments for consideration.

The proposed revisions are a step in the right direction and Senate Council was pleased with many of the revisions, but had serious concerns about items that are still missing from the policy, especially in terms of transparency and accountability. Without accountability, the proposed goals, albeit ambitious, are a cause of concern for the Council in terms of substantive outcomes. In order to be clear if targets are being reached, related data and assessments would need to be accessible and transparent to all campus and community stakeholders. Given the consensus that as much fossil fuel infrastructure as possible needs to be retired in this decade to have the biggest impact on climate protection, many of the proposed goals are not aggressive enough. Tangible actions need to be taken sooner rather than later. The budgetary impacts of and allocations needed for the proposed actions are also not sufficiently spelled out. Recognizing the budgetary implications, some Council members expressed concern that the Chief Financial Officer is not the appropriate role to be the responsible authority for overseeing this Policy: that position may be constrained by competing priorities that could be contrary to sustainability practices. These members asked for this issue to be worked out more explicitly. To help alleviate potential conflict of interest situations and to provide additional expertise, it was strongly suggested that the Academic Senate should be kept apprised of decisions related to the implementation of this policy.

The responses from the Divisional Committee on Campus Climate Change, Committee on Campus and Committee Environment, Committee on Planning and Budget, and Committee on Faculty Welfare are attached.

Sincerely,

Tara Javidi  
Chair  
San Diego Divisional Academic Senate

Attachments
November 1, 2021

TARA JAVIDI, CHAIR
Academic Senate, San Diego Division

SUBJECT: Presidential Policy on Sustainable Practices Proposed Revisions

The Committee on Campus Climate Change (CCCC) is grateful for the opportunity to comment on the latest version of the UC Presidential Policy on Sustainable Practices. We appreciate UC’s proposed efforts to reduce waste and improve energy efficiencies, and we agree with and applaud some of the updates to the policy. However, we have major concerns that the central issue of actual reductions in on-campus greenhouse gas emissions is not adequately addressed. Our concerns fall under three headings: accountability, climate protection and transportation.

1. Accountability
The pattern of setting targets and then failing to meet them without comment or consequence has to be broken. It has been the norm at UC as elsewhere to adopt ambitious goals with 5-30 year time frames, and then to delay actions until the end of the time frame, if the goals are remembered at all. To be effective, the long-term framework must include annual goals and real consequences when they are not fulfilled.

For example, one of the proposed amendments to the policy is that the 2020 emissions goals should be maintained. It is not clear to us that these targets were achieved, given the lack of accessible information. It is also not clear what part the pandemic played in lowering the environmental impact of university operations. These data must be transparent, and there should be consequences including sanctions if goals are not met.

2. Climate Protection
Given the accelerating severity of the climate crisis, the policy of “Carbon Neutrality by 2025” is incompatible with the stated goal of climate protection. It is clear that as much fossil fuel infrastructure as possible needs to be retired in this decade if we are to have any hope of keeping global temperatures at a livable level. Despite the overwhelming consensus that such measures have to be taken, UC’s present strategy is to continue powering the campuses with fossil fuels, emitting over 1 million tons of carbon dioxide per year, and to try to “offset” the resulting emissions of greenhouse gases through projects that sequester carbon in Rwanda, Ecuador, Tanzania, etc. Two campuses have also invested in low-cost landfill combustion credits in low-regulation U.S. states (i.e. paying for biomethane to be burned with open flares), and UCOP has been profitably trading biogas credits from plants in Louisiana, Wisconsin, and California. The CCCC perceives this strategy for emissions reduction to be undermined in its intent by the wholly inadequate duration criterion, which is set at 40 years, as well as suffering from the near-universal problem of unprovable and dubious additionality.

The UC offset proposal also generates a conflict of interest. On p. 31, the document suggests that investing in projects designed and overseen by UC faculty provides more oversight and accountability. But this conveys a cozy relationship between climate leadership and offset providers. The projects that
received seed money in 2019 are mostly worthy in their own right (in which respect they fail the test of additionality, because they could therefore be achieved by other means), but to entangle them in the University's climate neutrality goals runs the risk of appearing compromised. Furthermore, the committee charged with judging the suitability of proposed offsets should not be composed mainly of University employees obligated to support the use of offsets by their supervisors, but of faculty and students who have diverse and independent perspectives on the offsets ‘solution.’

Given the depth and breadth of the problems with carbon offsetting, we urge that the climate protection aspect of this sustainability policy be redirected. The money earmarked for purchasing offsets, including the funds generated by trading biogas credits, should be reallocated to planning for electrification. The policy suggests that planning for real campus decarbonization should begin around 2035. This would be unacceptably late. We must start now. If the world has any hope of hitting the target of a 45% reduction in GHG emissions by 2030, as laid out in the 2018 IPCC report, the UC must lead the way. Admitting that offsets cannot get the job done would be an unparalleled opportunity to get out in front of the conversation. Such an announcement would have a seismic effect on the debate, and advance the cause of climate justice with a vision and ambition worthy of the University of California.

3. Transportation
The report falls short in addressing the campus fleet emissions as well as the approximately 500,000 tonnes per year of carbon dioxide emissions that come from Scope 3 (other ground transportation and aviation). As it stands, the only concrete actions concern the campus fleets. However, the dates are put so far in the future as to appear of little value, e.g. the goal of 2050 for 30% of new vehicle acquisitions to be zero emissions. This means that our large campuses will continue to burn substantial amounts of methane in buses over the next few decades. Apart from this, there are only vague suggestions for policies that encourage low-emissions commuting, with no indication that anything will be implemented or accountable. There is also no mention of aviation. We understand that aviation and commuting are tough nuts to crack, as they concern individual choices by students, staff and faculty, but we can certainly generate some more creative ideas about changing the incentive structures. The committee would be happy to brainstorm about this question and make some suggestions.

Sincerely,

Fonna Forman, Chair
Committee on Campus Climate Change

cc: N. Postero
October 27, 2021

TARA JAVIDI, CHAIR
Academic Senate, San Diego Division

SUBJECT: Presidential Policy on Sustainable Practices Proposed Revisions

The Committee on Campus & Community Environment (CCCE) discussed the Presidential Policy on Sustainable Practices proposed revisions at its October meeting. The committee endorsed the proposed policy revisions. The committee appreciated the addition of three new areas to the policy, particularly the one addressing health and well-being. Some questions arose regarding the use of carbon offsets to meet climate protection goals, which should only be a temporary, short-term measure, instead of other longer-term measures that seek to reduce energy consumption and invest in alternative ways of generating electricity. The committee also noted the need for additional budget allocations to fund the achievement of the goals outlined in the policy, which otherwise might be unfeasible.

Sincerely,

Jorge Cortes, Chair
Committee on Campus Community and Environment

cc: N. Postero
October 29, 2021

TARA JAVIDI, CHAIR  
Academic Senate, San Diego Division  

SUBJECT: Presidential Policy on Sustainable Practices Revisions  

The Committee on Faculty Welfare (CFW) reviewed the Presidential Policy on Sustainable Practices revisions at its October meeting. CFW would like to congratulate Executive Vice President Brostrom and the President’s Office on producing such a comprehensive, succinct and meticulously detailed document on Sustainable Practices. This report leaves very little room for further improvement or detail. We have two points:

1. In Sec.D.2.a and b, where the report talks about “By 2025, each location will strive to reduce its percentage of employees and student commuting by SOV by 10%...” and projects similar optimistic numbers for 2050, no concrete strategy is suggested by which such targets will be achieved. A relatively simple suggestion might be to create disincentives for campus parking by pausing further construction of expensive parking structures or increasing parking fees, and perhaps channel the unused resources into subsidizing or incentivizing ridership in public transport systems. Such practices are prevalent around the world, in developed and not-so developed countries.

2. At the cost of this second point being perceived as uninviting, and the fact that the request for the response is narrowly focused on the proposed policy revisions, we will share it anyway, given its enormous and direct impact on the climate crisis. This report has emphasized throughout, and rightfully so, its effort at climate protection. A facet that is almost never addressed in the Western World is that “global toilet paper production wipes out about 27,000 trees per day, which comes out to almost 9 million trees per year”. Given the leadership role that UC has assumed in the climate crisis, maybe it’s time for the University to gently encourage the use of water bidets (as is resorted to by nearly two billion people around the world) by installing them in some of the dorms and buildings and slowly attempt to get the population away from the use of toilet paper. Even though bidets may require paper, they use much less of it (and paper production is very water intensive so that compensates the added water use). This would be a good way of changing people’s habits, given the number of students, faculty, and staff in the system. This will tie in nicely as a sub-section of item 3. Water Action Plans.

Sincerely,

Shantanu Sinha, Chair  
Committee on Faculty Welfare

cc: N. Postero
October 28, 2021

TARA JAVIDI, CHAIR
Academic Senate, San Diego Division

SUBJECT: Presidential Policy on Sustainable Practices Proposed Revisions

The Committee on Planning and Budget (CPB) discussed the Presidential Policy on Sustainable Practices proposed revisions at its October meeting. The new emphasis on telecommuting, flexible work schedules, integration of environmental justice and the new section on health and well-being were welcomed and appreciated by the committee.

The CPB notes that the budgetary impacts of the proposed actions are not clear. Implementation “within constraints of research needs and budgetary requirements” implies that additional scenario planning and simulations are needed. We would like to request more clarity and transparency, especially as the responsible authority is now the CFO, who will be constrained by desiderata that are contrary to sustainability practices.

The committee recommends additional Senate involvement in the Carbon Abatement Technical Committee. The committee could leverage the rich research experience of the faculty, which will be critically important in shifting the campus away from fossil fuel sources.

The committee noticed that the performance assessment (p. 45) is underspecified and vague. There are no measurable metrics, no plan for third-party validation, and no clear carbon reduction targets specified. The only sentence, “The rating must be for a current certified STARS report, and under the current STARS point allocations” is not meaningful. Full details of how UCSD will measure the success of its sustainability practices should be provided, and these should include independent assessments.

The committee noticed that throughout the document, the word “shall” was replaced by the word “will”. In critical documents, “shall” typically denotes something that is required, and “will” tends to imply future possibility. The committee wishes to know whether this softening of language reflects a less firm commitment towards important sustainability goals.

Last but not least, the committee recommends the preparation of a concise and clear executive summary of the Sustainability Practices Policy that can be shared with students, staff, faculty and other stakeholders of the University.

Sincerely,

Gedeon Deák, Chair
Committee on Planning & Budget

cc: N. Postero
December 6, 2021

Robert Horwitz  
Chair, Academic Council  
Systemwide Academic Senate  
University of California Office of the President  
1111 Franklin St., 12th Floor  
Oakland, CA 94607-5200

Re: UCSF Comments on the Proposed Revisions to the Presidential Policy on Sustainable Practices

Dear Robert:

The San Francisco Division of the Academic Senate recently reviewed the amendments to the proposed revisions to the Presidential Policy on Sustainable Practices. The UCSF Senate is appreciative of the efforts that the Office of the President is taking to require sustainable practices on UC campuses and achieve decarbonization as quickly as possible.

With that in mind, our standing Committee on Sustainability made the following comments:

1. **Emissions Targets**: UCSF is supportive of the revision recognizing that telecommuting and other flexible work arrangements provide an opportunity to reduce emissions. However, the current targets for scope 3 emissions may be too modest and too slow.

2. **Onsite Combustion**: Given the serious environmental and health consequences of the continued use of fossil fuels, the UCSF Senate supports setting explicit targets to reduce the use of fossil fuel combustion to emergency situations only. Additionally, the policy currently requires that 40% of onsite combustion be biogas by 2025; it is worthwhile to ask why this target is not closer to 100%.

3. **Fleet Sustainability**: Although we support the requirement to develop a Fleet Sustainability Implementation Plan by January 1, 2022, we feel that the goals in are again too modest. The Policy sets the goal that all new passenger cars and light-duty trucks all medium-and heavy-duty vehicles acquired after January 1, 2035 and after January 1, 2045 respectively, will be zero-emission vehicles. Although this goal conforms to current State guidelines, setting faster targets for UC campuses may be possible.

4. **Health Facilities**: UCSF recognizes that water usage and solid waste generation may be truly unique to acute care facilities, resulting in different targets for these facilities. However, it is worthwhile to state explicitly reasons for variances.

5. **Carbon Offsets**: Carbon offsets should be used as a temporary bridge to true carbon neutrality, and therefore argue that their use should be obligatory and not merely optional. In addition, it is curious why high-quality carbon offsets are not explicitly required when all other options for meeting carbon neutrality goals have been exhausted.

Thank you for the opportunity to opine on the revisions to this important Presidential Policy. If you have any questions, please let me know.
Sincerely,

[Signature]

Steven W. Cheung, MD, 2021-23 Chair
UCSF Academic Senate

Enclosures (1)
Cc: Chelsea Landolin, Chair, UCSF Sustainability Committee
Dear Chair Cheung:

The Committee on Sustainability writes to comment on the Systemwide Review of the Proposed Revisions to the Presidential Policy on Sustainable Practices. Overall, the Committee is supportive of efforts to require sustainable practices on UC campuses and achieve true carbon neutrality as quickly as possible. We believe that this is an intermediate step toward a higher goal of full decarbonization. As a part of a campus dedicated to “advancing health worldwide,” we feel that it is important to tackle the health impacts of climate change and air pollution urgently and with vigor. In accordance with the findings of the Intergovernmental Panel on Climate Change in the past five years, avoiding the worst impacts of climate change requires a dramatic upscaling of interventions and moving at a far more aggressive pace than is currently occurring. It is incumbent upon our system to ensure that the reach of these changes and the pace at which they are made are in alignment with the state of the science.

To this end, the Committee is supportive of the goals to achieve climate neutrality from scope 1 and 2 emissions by 2025. The Committee is also supportive of the revision recognizing that telecommuting and other flexible work arrangements provide an opportunity to reduce emissions. However, the Committee unanimously views the current targets for scope 3 emissions to be too modest and too slow. The shift to working from home during the COVID-19 pandemic has provided a unique opportunity to re-evaluate commuting and business travel needs, and the Committee is concerned that the revised version of the policy does not fully leverage this rare and potentially game-changing opportunity to reduce costs, improve quality of life, and further decarbonize the UC system. The Committee would therefore like to ask whether faster, more stringent targets for scope 3 emissions had been considered, and, if not, why that is the case. We strongly support the rapid, comprehensive implementation of such targets along with appropriate accountability mechanisms.

The Committee supports prohibiting new buildings and major renovations from using onsite fossil fuel combustion but would argue that the current policies should be strengthened so as to truly minimize fossil fuel combustion as much as possible. Currently, the policy allows connections to existing onsite combustion. The committee would ask whether onsite combustion is truly necessary in most cases or whether the University should strive to only use fossil fuel combustion in the case of loss of power emergencies. Given the serious environmental and health consequences of the continued use of fossil fuels, the Committee supports setting explicit targets to reduce the use of fossil fuel combustion to emergency situations only. Additionally, the policy currently requires that 40% of onsite combustion be biogas by 2025; the Committee would like to ask why this target is not closer to 100%.

The Committee supports the requirement to develop a Fleet Sustainability Implementation Plan by January 1, 2022. However, the Committee feels that the goal that all new passenger cars and light-duty trucks acquired after January 1, 2035, and all medium-and heavy-duty vehicles acquired or operated after January 1, 2045, will
be zero-emission vehicles is too modest. Although this goal conforms to current state guidelines, the Committee would be supportive of setting faster targets for UC campuses. Additionally, the Committee feels that the goals of a 10% reduction in single-occupancy vehicle commuting to campus by 2025 relative to 2015 levels, 4.5% zero-emission commuting vehicles by 2025, and 30% zero-emission commuting vehicles by 2050 are far too modest. Powerful tools are available to limit on-campus parking and encourage less carbon-intense commuting options, especially given recent experiences with telecommuting. The Committee would therefore like to ask whether more stringent targets for both the fleet and commuting vehicles had been considered.

The Committee is also supportive the establishment of a clear systemwide policy for health facilities with specific solid waste and water use targets that are unified across campuses. The Committee recognizes that water usage and solid waste generation may be truly unique to acute care facilities, resulting in different targets for these facilities. However, the Committee would ask whether health facilities should be held to the same requirements for construction and operating energy use as other campus facilities are, rather than having their own targets. The Committee also questions whether the solid waste and water use targets for UCHealth are sufficiently ambitious. Finally, for all facilities, the Committee would like to ask whether LEED Silver is sufficiently ambitious or whether Gold should be the minimum target, with Platinum desired.

The Committee is supportive of the revisions to the policy defining standards for the quality of any carbon offsets purchased. The Committee believes that their use as a merely temporary bridge to true carbon neutrality should be emphasized. However, the Committee would also argue that their use should be obligatory and not merely optional, as the policy is currently written. The Committee therefore asks why high-quality carbon offsets are not explicitly required when all other options for meeting carbon neutrality goals have been exhausted.

Finally, the Committee would like to ask about the intentions underpinning the changes throughout the document from “shall” to “will.” To the extent that the two words are synonyms and the University intends to achieve its goals on or ahead of schedule, the Committee is supportive of this change. However, if the intent behind this change is to make these goals appear to be non-binding or to make routine the process of requesting and receiving exemptions, then the Committee is not supportive of this change.

Thank you for the opportunity to comment on this important issue. If you have any questions on the Committee on Sustainability’s comments, please contact me or Academic Senate Analyst Liz Greenwood (liz.greenwood@ucsf.edu).
December 7, 2021

To: Robert Horwitz, Chair
Academic Senate

From: Susannah Scott, Chair
Santa Barbara Division

Re: Systemwide Review of Proposed Revisions to the Presidential Policy on Sustainable Practices

The Santa Barbara Division distributed the proposed policy for comment to the Council on Planning and Budget (CPB), Council on Faculty Welfare, Academic Freedom, and Awards (CFW), and the Committee on Research Policy and Procedures (CRPP). CRPP opted not to opine. The individual responses are attached for your review.

CPB recognized the current draft as an improvement, however, they note “several gaps remain that represent a lost opportunity to provide useful guidance to campuses.” CFW members agreed that the policy, in general, is a step in the right direction for the university. Both groups offer a number of comments for consideration, below.

CPB called attention to the fact that the policy does not address California’s lack of affordable housing, especially in the cities surrounding UC campuses. CPB felt that this is a “conspicuous omission since the University’s sustainable transportation and health equity goals cannot be achieved if students, faculty, and staff cannot access affordable housing near the universities where they work.” The Council also pointed out that the current policy does not address travel commonly required for professional activities (such as conferences, program reviews, workshops, etc.). CPB considered whether the University should develop policies that incentivize additional use of online or hybrid meetings, given that jet fuel dramatically increases carbon emissions.

Both CPB and CFW noted that the new section on Health and Well-being is vague, with CPB stating that the section fails to articulate the issues or provide guidelines for future policies.

CFW also offered the following list of specific questions and observations for continued reflection:
- The omission of light emitting diodes (LEDs) for lighting is a bit of a surprise. They provide an advantage in energy savings as well as avoid mercury, a major risk to health and environment. If they are not already implicit in new building design, LEDs should
certainly be considered in the replacement of fluorescent or compact fluorescent lamps when practical, in the course of maintenance or renovations.

- The university should be mindful, in the design of new buildings and remodeling of old, to consider future climate change and provide sufficient cooling in the face of the increased frequency of hot weather. Perhaps more unique to the Santa Barbara campus but certainly a consideration in the context of climate change is also campus accessibility in the context of sea level rise. Because this policy predates COP26, are the practices contained herein in alignment/compliance with the goals established there? Are there any areas where we are behind?

- The policy appears to be without enforcement mechanisms for those who are non-compliant; it would be more effective to outline the ramifications of failure to meet targets.

- The concept of sustainability continues to evolve with time; it is noted this policy has taken different forms since the Regents first approved sustainability policy principles in 2003. That said, some members questioned the definition of sustainability that is assumed but not strictly defined within the policy, and the UC's commitment to standards that are set by external agencies over whom we have no control/input.

- Some members would like to see the policy incorporate regenerative approaches and traditional ecological knowledges of California's Indigenous populations. Relatedly, the policy does not include mention of conservation or campus wildlife, and could do more to encourage sustainable farming in its Foodservices section. Fair trade and ethical practices should be a consideration in Foodservices (as it is in Procurement).

- Some members are concerned about the lack of mention of nuclear energy in the document. Similarly, they offer a critique in the focus on electric vehicles in that the cobalt required comes from exploited miners in Central Africa (and thus are not sustainable).

We thank you for the opportunity to comment.
To: Susannah Scott, Divisional Chair  
UCSB Academic Senate

From: Douglas Steigerwald, Chair  
Council on Planning & Budget

Re: Systemwide Sustainable Practices Policy

The Council on Planning & Budget (CPB) has reviewed the systemwide proposal for updates to the Presidential Policy on Sustainable Practices. The proposal updated the University’s sustainability policies in several key areas (Green Building Design, Climate Protection, Transportation, Water Systems, and UC Health). It also added a section (Health and Well-being) recognizing the need to address the health inequities that arise from climate change and unequal access to healthy food. In all areas, the systemwide policies seek to meet or exceed by 20-30% the current state standards for maximizing energy efficiency, increasing reliance on clean energy supplies, reducing carbon emissions, and achieving carbon neutrality. The University pledges to purchase only “high-quality [carbon] offset credits to meet its climate protection goals.” It plans to prioritize investing in offset projects that advance the University’s research mission and social justice goals. The proposal identifies new benchmarks, but it does not outline a plan for reaching them. In reaching any goal, the Council feels it would be helpful to share best practices among campuses, with an eye toward continued innovation and improvement.

While the revisions include admirable improvements over earlier drafts, the CPB notes that several gaps remain that represent a lost opportunity to provide useful guidance to campuses. Most notably, the Systemwide Sustainable Practices policy does not address California’s lack of affordable housing, especially in locales near UC campuses. We see this as a conspicuous omission since the University’s sustainable transportation and health equity goals cannot be achieved if students, faculty, and staff cannot access affordable housing near the universities where they work. The new section on Health and Well-being is vague and fails to articulate the issues or provide guidelines for future policies. Finally, the University’s sustainable practices policies do not address travel commonly required for professional activities (such as conferences, program reviews, workshops, etc.). Given that jet fuel dramatically increases carbon emissions, should the University develop policies that incentivize the creation of more online or hybrid online/in-person meetings?

cc: Shasta Delp, Academic Senate Executive Director
December 2, 2021

To: Susannah Scott, Divisional Chair
    Academic Senate

From: Lisa Parks, Chair
      Council on Faculty Welfare, Academic Freedom, and Awards

Re: Systemwide Review of Proposed Presidential Policy on Sustainable Practices

The Council on Faculty Welfare, Academic Freedom, and Awards met on December 1, 2021 to discuss the Proposed Presidential Policy on Sustainable Practices.

While some members questioned their own expertise in being able to offer recommendations for substantive changes, it was generally agreed that this policy is a step in the right direction for the university, and members are supportive of its goals. It is noted that the policy has the endorsement of our campus’s Chancellor’s Sustainability Committee. The council offers some questions and observations for continued reflection below:

- The omission of light emitting diodes (LEDs) for lighting is a bit of a surprise. They provide an advantage in energy savings as well as avoid mercury, a major risk to health and environment. If they are not already implicit in new building design, LEDs should certainly be considered in the replacement of fluorescent or compact fluorescent lamps when practical, in the course of maintenance or renovations.

- The university should be mindful, in the design of new buildings and remodeling of old, to consider future climate change and provide sufficient cooling in the face of the increased frequency of hot weather. Perhaps more unique to the Santa Barbara campus but certainly a consideration in the context of climate change is also campus accessibility in the context of sea-level rise. Because this policy predates COP26, are the practices contained herein in alignment/compliance with the goals established there? Are there any areas where we are behind?

- The policy appears to be without enforcement mechanisms for those who are non-compliant; it would be more effective to outline the ramifications of failure to meet targets.

- The concept of sustainability continues to evolve with time; it is noted this policy has taken different forms since the Regents first approved sustainability policy principles in 2003. That said, some members questioned the definition of sustainability that is assumed but not strictly defined within the policy, and the UC’s commitment to standards that are set by external agencies over whom we have no control/input.

- Some members would like to see the policy incorporate regenerative approaches and traditional ecological knowledges of California’s Indigenous populations. Relatedly, the policy does not include mention of conservation or campus wildlife, and could do more to encourage
sustainable farming in its Foodservices section. Fair trade and ethical practices should be a consideration in Foodservices (as it is in Procurement).

- Some members are concerned about the lack of mention of nuclear energy in the document and the waste produced by the creation of nuclear weapons. Similarly, they offer a critique in the focus on electric vehicles in that the cobalt required comes from exploited miners in Central Africa (and thus are not sustainable).

- Members praised the section on Health and Well-Being but suggest that the language is very vague. They suggest working to expand and explain.

| CC: Shasta Delp, Executive Director, Academic Senate |
December 7, 2021

Robert Horwitz, Chair
Academic Council


Dear Robert,

The Santa Cruz Division of the Academic Senate has completed its review of the Proposed Revisions to Presidential Policy on Sustainability Practices with the Committees on Information Technology (CIT), Research (COR), and Planning and Budget (CPB) responding. All committees offered specific recommendations regarding the key changes brought forward in an effort to improve the readability and clarify the intent of the policy. Overall, they appreciated the desire to mitigate environmental impacts and update sustainability practices.

While generally supportive of the policy, CPB calls for a “bolder vision of the energy system that is necessary towards achieving these goals.” This is echoed by CIT, which also suggests that “the university could be more aggressive with sustainability goals.” The committees noted some omissions and provided recommendations in areas lacking feasibility and edits where needed.

CIT advised that there was “little to no discussion of energy used for IT functions, including cooling” in the proposed revisions, while COR highlighted the “absence of a plan for electronic waste, such as reuse and recycling.” These areas were not addressed in the proposal and their inclusion is recommended.

Several procedures seemed impractical to the committees. In particular, CPB strongly “recommends a firmer and perhaps shorter timeline towards exiting the ‘transitional strategy’ of using carbon offsets, and of moving towards truly carbon neutral or carbon negative energy.” Both CPB and CIT were concerned about the Green Lab Program, with CPB recommending that “it might be better to specify the sorts of results or outcomes that are expected and indicate that the campus designates a body to oversee the process and collect the results, but leave the methodology to the individual campuses.” CIT notes that “placing the financial and resource burden on individual PIs to update their labs would likely prevent compliance.” More broadly COR urges the Office of the President to provide overall implementation and financial support for this policy.

In alignment with the recent divestment from fossil fuels, COR calls for more support for renewable energy use, with CIT noting “new UCSC solar plant provides 2% of campus energy. This could be increased dramatically with additional solar installations at UCSC and sister campuses.”

Specific edits are called for by CPB in regards to two instances of outdated information and inconsistency with point 1a of the Green Building Design section.
As always, thank you for the opportunity to comment. I am enclosing the committee responses and hope these observations prove useful in the continued development of this important policy.

Sincerely,

David Brundage, Chair
Academic Senate, Santa Cruz

cc: Peter Alvaro, Chair, Committee on Information Technology
    Jarmila Pittermann, Chair, Committee on Research
    Dard Neuman, Chair, Committee on Planning and Budget
November 30, 2021

David Brundage, Chair
Academic Senate

Re: Proposed Revisions to Presidential Policy on Sustainability Practices

Dear David,

During its meeting of October 13, 2021, the Committee on Information Technology (CIT) reviewed the proposed revisions to the Presidential Policy on Sustainable Practices, which aim to clarify intent, and include the updating of specific targets, additional requirements, and a new Health and Well-Being section. Members questioned how the policy will affect IT energy consumption, how implementation will be encouraged with regards to laboratories, and suggested that the university could be more aggressive with sustainability goals.

Information Technology (IT) consumes large amounts of energy and renewables on each campus. Members were therefore concerned to find that there is little to no discussion of energy used for IT functions, including cooling, in the proposed revisions. With regards to renewables, members questioned how the policy affects the Cogeneration Plant (Cogen), which is diesel dependent. A policy on Sustainability Practices could include a goal of having solar backup batteries at campus plants, which could reduce the overall carbon footprint, and aid in the prevention of lost power, which greatly hinders faculty research.

With regards to implementation, members questioned whether subsidies would be provided to assist principal investigators (PIs) in making labs more green under the UC Green Laboratories Action Plan. CIT notes that placing the financial and resource burden on individual PIs to update their labs would likely prevent compliance with the action plan and detract from overarching sustainability goals.

Although the policy states that the campus will be using 100% clean energy by 2025, as faculty, members suggested that the University could be more aggressive. Members noted that the new UCSC solar plant provides 2% of campus energy. This could be increased dramatically with additional solar installations at UCSC and sister campuses.

Sincerely,

Peter Alvaro, Chair
Committee on Information Technology
Dear David,

Thank you for the opportunity to opine the updates to the Presidential Policy on Sustainable Practices.

The committee was overall pleased with the proposed goals that seek to address the current suite of environmental crises stemming from anthropogenic impacts.

We understand that this document presents targets as envisioned by the leadership but we urge the President’s Office to work with the campuses and ultimately provide stakeholders and members of UC communities with planning assistance for implementation of such policies, as well as means of financial support.

While the policy was ambitious in its scope, the committee noticed the absence of a plan for electronic waste, such as reuse and recycling. Mishandled electronic waste can be a significant source of pollution and environmental toxins, while the continued demand for electronic products and their components strains both sustainability and social responsibility.

Secondly, we suggest that the University of California proactively seek investment in renewable energies and projects grounded in sustainability, carbon neutrality and social justice. The University of California has recently divested from fossil fuels so we urge the administration to include in its policy a strong statement of support for investment in sustainable businesses and other types of forward-looking enterprise.

Thank you for your consideration, and we hope that our feedback is useful.

Sincerely,

/s/
Jarmila Pittermann, Chair
Committee on Research
At its meeting of November 18, 2021, the Committee on Planning and Budget (CPB) reviewed the proposed Presidential Policy on Sustainable Practices. Overall, CPB welcomes this “transitional strategy” (p. 11) and appreciates the guidelines for the use of offsets (pp. 27-29) given the extensive criticism of some carbon offsets as being uncertain and on occasion fraudulent. Moreover, CPB appreciates that the proposed policy addresses some of the well-known problems with carbon offsets. More broadly, CPB would welcome a bolder vision of the energy system that is necessary towards achieving these goals. CPB provides the following concerns, recommendations, and edits:

- Even with well-designed guidelines, it is not clear and therefore likely impractical for the UC to adequately monitor the quality of distant offset projects. **CPB therefore recommends a firmer and perhaps shorter timeline towards exiting the “transitional strategy” of using carbon offsets, and of moving towards truly carbon neutral or carbon negative energy.**
- Regarding the Green Building Design, there is an inconsistency with point 1a: the same sentence appears multiple times and with different percentages. Specifically, it states that UC aims at outperforming the California Building Code (CBC) efficiency standards by at least 20% (first sentence), and then by at least 30% (second sentence). Hopefully the costs incurred to outperform the California Building Code (CBC) efficiency standards by at least 20% (or 30%) will not result in “no new buildings at all.” which is of course the greenest possible choice.
- The policy’s approach specifies processes that may not be suitable at every campus.
  - For example, on page 13, point 2, the document states that “All campuses will maintain an ongoing Green Lab Assessment Program supported by a department on campus to assess operational sustainability of research groups, labs and research spaces. At least one staff or faculty member from the campus must have the role of managing the Green Lab Assessment Program.” It is not clear why the Green Lab Assessment Program is delegated to one department on campus, and if those faculty or staff members should be from the delegated department. How can faculty or staff from one department assess what is going on in a lab from another? The procedure E4 (page 31) to implement sustainable building and laboratory operations says that campuses will assess at least three new research groups through their Green Assessment Programs. Who chooses such groups?
  - It might be better to specify the sorts of results or outcomes that are expected and indicate that the campus designates a body to oversee the process and collect the results, but leave the methodology to the individual campuses.
- On two occasions there appears to be outdated information:
  - On page 32, there appear to be outdated timelines. The document states that the policy on sustainable practices is being revised in 2021 but at page 32 point 3 the document states that “By the end of 2018 locations other than health locations will submit new waste management plans...”
  - On page 38 (Sustainable water system), point I.1.c.ii, the potable water usage target for 2025 is computed using a baseline period that is three consecutive years FY05/06, 06/07 and 07/08 for each location. The baseline is about 15 years old. This target does not take into account the dynamics of each UC campus, i.e., different growth rates. It seems
reductive to simply multiply these 2005-2008 baseline numbers by the same constant factor for all UCs to come up with a potable water usage target for 2025.

CPB appreciates the opportunity to comment on the proposed policy revisions.

Sincerely,

Dard Neuman, Chair  
Committee on Planning and Budget

cc:  COR Chair Pitterman  
     CIT Chair Alvaro  
     CFW Chair Orlandi  
     CDF Chair Holl  
     CAAD Chair Silva Gruesz