June 15, 2021

Mayor and City Commissioners of Helena
316 N. Park Avenue
Helena, MT 59623

RE: CCB recommendations on the City Budget; Sustainability Coordinator Position; and Solar Ready Provision of 2018 Energy Conservation Code

Dear Mayor and Commissioners,

Thank you for your past support for sustainability and conservation efforts in Helena as these align well with the Commission’s Strategic Outcomes for the FY2022 (“FY22”) Budget, namely, Promoting Healthy and Sustainable Growth, Promoting a Safe Community, and Improving Neighborhood Livability.

Later this month, you will be considering a number of issues and actions which have implications for Helena’s sustainability efforts. The Helena Citizen Conservation Board (CCB) offers recommendations in three areas: 1) FY22 City Budget; 2) Sustainability Staffing; and 3) 2018 International Energy Conservation Code Solar Ready Option.

FY2022 Budget

The CCB expresses its enthusiastic support for the sustainability-related items in the FY22 budget, specifically:

**Fund #100-011-General Government** - Sun Run ($1000); ICLEI membership ($600); sustainability meetings ($1400), support funding for the Waste Reduction Strategic Plan ($60,000), grant matching funds ($30,000), and inter-local policy development funds ($30,000)

**Fund #238** - Continued support for the City’s Solar Revolving Loan Program (with the transfer $60,000 from General Fund)

**Fund #440** - Support for the Waukesha Well Project to convert from treated, potable water to groundwater as the water source ($40,000)

**Fund #541, 543, 546 - Solid Waste, Fund #547 - Recycling** - Support for the Waste Audit to inform development of the Strategic Plan for Waste Reduction (included in the request to fund the Solid Waste Master Plan)

**Fund #521-Water** - Water Treatment Plant’s (WTP) request for funds to optimize plant operations with new chemical feed systems and pumps, and upgrades to the PreSettlement Building (natural gas heater and primary and secondary HVAC systems) that could save 25-50% in natural gas and other costs. In addition to improving the current water supply system, WTP is developing a Master Water Plan for future (next 25 years) water supplies, sources, and needs.

**Fund #531-Wastewater** - Support the staff and management at the Wastewater Treatment Facility’s continued search for opportunities to conserve energy and water resources, including their funding request for a standby generator and other equipment (e.g., roll-off containers, secondary sampler, etc.).
Development of a Wastewater Master Plan to take a holistic look at the wastewater collection, sources, volume, and treatment of wastewater to effectively plan for future scenarios.

Furthermore, the CCB offers support and recommendations as follows:

- Supports the Finance Department’s goals to conduct a needs assessment of relevant information from stakeholders and to develop financial policies to align with best practices. (Wildly Important Goals, or WIGs #1 and 2, at pp 113-14 of the draft budget.) The CCB encourages those updates to include improvements to water billing and measures that promote water conservation and waste reduction.
- Supports the Facilities Department’s goal to “[make] all facilities 50% energy efficient by 2026.” (WIG #2, at pp. 122-23)
- Recommends amending the Solid Waste Division’s goal of “recycling 40% of all waste from the landfill for reuse or recycled goods” for consistency with the City’s Waste Reduction Resolution to divert 50% of the City’s solid waste from the landfill by 2040, with an interim goal of 35% by 2030, and to ensure consistency with the City’s Growth Policy. (WIG #2, p. 128)
- Recommends developing an integrated City Water & Wastewater Master Plan to address planning for future water quantity and quality and wastewater treatment as population growth continues throughout the region. The plan should consider climate change and its effect on flooding, reduced snowpack, drought, and fire needs and reduce future demand through education, incentives, disincentives, and implications of reduced demand on revenue.

**Sustainability Coordinator Position: FTE and Organizational Structure**

The CCB views sustainability work as a City-wide effort, involving all City Departments (to varying degrees) as well as the Helena community. To be most effective, the Sustainability Coordinator must be free to work with all appropriate City Departments and to operate and make recommendations to the City independently. For example, a significant amount of the Sustainability Coordinator’s efforts involve working to reduce the City’s energy consumption and greenhouse gas emissions. These efforts run across City operations, including Transportation, Facilities, and Parks and Recreation. It is worth noting that Montana peer communities have significantly higher Sustainability staffing than Helena: The City of Missoula has 2 FTE, Bozeman has 2 FTE, Missoula County has 2 FTE, the University of Montana has at least 2 FTE, and Montana State University has 2 FTE plus 6 part-time students.

Much critical work lies ahead to continue to improve the efficiency and sustainability of the City’s operations, in fact, sustainability positions tend to more than pay for themselves through increased efficiencies and savings on energy, fuel, and water bills. For these reasons, the CCB recommends the Commission consider an additional 0.5 FTE in the budget to equate to a full 1.0 FTE for the Sustainability Coordinator.

As mentioned above, sustainability work crosses Departmental responsibilities and is interdisciplinary in nature. This is reflected in a recent survey conducted by the US Sustainability Directors Network, showing that Sustainability positions are more frequently located in City Manager’s or Mayor’s Offices than within an individual Department.

The CCB is concerned about the relocation of the Sustainability Coordinator position to the Public Works Department - moving from a direct report to the City Manager to a subsidiary position reporting to a new manager two layers below the Public Works Director. In the CCB’s view, this signals a
de-prioritization of sustainability efforts by the City of Helena, makes interdepartmental sustainability efforts more difficult, and may impede the ability of the Sustainability Coordinator to independently address and recommend measures within a holistic systems framework.

To cite a specific example, to begin implementing the City’s recently-adopted Waste Reduction Resolution, the CCB asked the City to appropriate $60,000 for FY22 out of the General Fund to contract for the development of a Strategic Plan for Waste Reduction in Helena. The CCB requested the contract be directed by the Sustainability Coordinator (and necessarily entail extensive consultation with the Solid Waste Division among others). The CCB is concerned this organizational change could jeopardize the objectivity and ultimate effectiveness of the Strategic Plan.

To address these concerns, the CCB asks the City Commission to adopt an organizational structure reflecting the importance the City places on Sustainability by continuing to have the Sustainability Coordinator report directly to the City Manager.

2018 International Energy Conservation Code

The Citizen Conservation Board recommends and supports adoption of the 2018 International Energy Conservation Code at the June 21 City Commission meeting, as a key step in reducing energy consumption and a necessary (but not sufficient) action to move Helena towards the community-wide clean electricity goals approved by previous City resolution.

The CCB further recommends that rather than rejecting adoption of the Appendix RA Solar Ready provision of the 2018 Energy Code, the City Commission defer a decision regarding that provision until further research and public comment can be heard. While it is likely that adoption of the Appendix RA provisions would result in a negligible impact on the cost of home construction, it may also be true that the minimal requirements of Appendix RA may have a small positive impact on solar adoption. Further study is necessary to resolve these issues, and it is our understanding that nothing precludes the City from adopting Appendix RA at a later time.

Thank you for considering the Conservation Board’s recommendations.

We look forward to our continued work with you and the residents of Helena as we strive to create a stronger, more climate-resilient and healthy community.

Sincerely,

Diana Hammer
Chair, Citizens’ Conservation Board

cc: City Manager, Rachel Harlow-Schalk
Sustainability Coordinator, Patrick Judge