

SUSTAINABILITY MISSION STATEMENT:

Protect the natural and cultural resources which characterize the City of Fitchburg and promote responsible land development and economic growth for a thriving, resilient and Forward Fitchburg.

TRANSPORTATION

- **Bike-to-Work Commuter Challenge vs. Sun Prairie** – 16 Fitchburg staff and elected officials participated totaling 6,553 miles of bicycling and walking instead of driving to work.
- **Fitchburg Bike Rodeo Event** – The third annual Bike Rodeo Event was held May 11 to teach kids/parents safe bicycle riding skills.
- **Rectangular Rapidly Flashing Beacons (RRFBs)** – installed at the Badger State Trail crossing with McKee Road. The RRFBs will improve safety for bicyclists, pedestrians, and motorists at this intersection by improving awareness and visibility of path-users at the crossing. This project included Bicycle Safety Grant funding from Dane County.
- **Dawley Bike Hub to be Completed Spring 2014** – featured in the new bike hub will be restrooms, viewing platforms, a bicycle repair station and air pump, as well as decorative benches and bike racks, a display map, drinking fountain, and water bottle filling station.
- **Cannonball Path to be Completed Summer 2014** – The overpass atop of the Beltline is complete and the new path will be finished in the summer of 2014, connecting Verona to Madison along one continuous paved path. This project will also incorporate new way-finding signage as part of the improvements.
- **Solar-Powered LED Lights** were installed by Fitchburg crews along a portion of the Capital City State trail. Saris Cycling Group donated the lights as a test project to see how well the lights would perform in that heavily wooded area and gauge responses from path users on the effectiveness of the lights to delineate the centerline of the path.
- **Route 44/48 considered for expansion in Aug 2014** – City and Metro staff considered an expansion of Routes 44/48 in Fitchburg to provide service along E. Cheryl Parkway to the Swan Creek and Uptown neighborhoods. A public meeting was held in October to consider expansion in 2014.
- **Voluntary Idling Reduction Campaign** in progress with several local businesses and organizations participating, including Summit Credit Union, U.S. Bank, BMO Harris, The UPS Store, Ganshert Nursery and Landscapes, LLC, Top Hat Fireplace and Chimney, Independent Living, Inc., and Eagle School.

LAND USE

- **Brush Cleanup Volunteer Events** – Neighbors, Volunteers from Cops Grocery Stores, and City staff removed over 8,000 cubic feet of invasive buckthorn and other brush from Wildwood Kettle as well as buckthorn from the Seminole Glen woodlot.
- **Tree Advisory Committee** reauthorized to advise the Park Commission and City staff on urban forestry issues and initiatives, including the Save-an-Ash emerald ash borer treatment program.
- **Emerald Ash Borer Preparedness** – Capital equipment purchased and 150 public ash trees treated with insecticide to ward off [Emerald Ash Borer](#). [Save-an-Ash](#) donation program launched to raise additional funds to treat city ash trees. Additional funding secured in 2014 city budget to treat remaining healthy public ash trees. Public EAB informational meetings held to raise awareness and educate residents on issue. Hosted EAB Summit where forestry staff from municipalities in southern Wisconsin learned about impacts of EAB and how to manage the pest.
- **Arbor Day & International Migratory Bird Day (IMBD) Celebration** – Coordinated first annual IMBD event to celebrate and bring attention to the importance of trees and birds in Fitchburg. Fitchburg became a [Bird City Wisconsin](#) in 2013 and has been awarded Tree City USA status for the last 16 years.

- **Tree Planting & Forest Restoration Pilot** – Coordinated volunteer planting of 36 trees in local parks with community groups, including the first phase of planting of the Quarry Hill Park Forest Restoration pilot project. Planted additional 496 trees in city parks and on street terraces.

ENERGY

- **City of Fitchburg Campus Retro-commissioning** (City Hall, Community Center and Library) underwent a retro-commissioning process to optimize building systems and energy efficiency performance.
- **2012 Draft Energy Consumption and Greenhouse Gas Emissions** reported completed and shared with RCC members. Data revealed the commercial sector as the largest energy consumer and contributor to greenhouse gas emissions.

WATER

- **[Nine Springs Creek Watershed Master Plan](#)** projected to be completed in 2014. This master plan aims to establish an overall strategy and set of recommendations to address stormwater rate, quantity and quality issues affecting the Nine Spring Creek.
- **Green Streets/Infrastructure** ordinance and policy recommendations have been drafted and are currently being reviewed by City staff. These updates attempt to encourage the use of green infrastructure in street restoration/construction projects as an alternative to conventional stormwater/street design.
- **Annual Waterway Clean-Up** - covered Dunn's Marsh, Syene and McCoy Road, and Wildwood Kettle Park.
- **RCC's Stream Sampling Subcommittee conducted quarterly water sampling and analysis.**
- **[The Water and Sanitary Sewer Utilities](#)** continued the toilet rebate program in 2013 to encourage replacement of high gallon per flush toilets with WaterSense-approved models to [promote water conservation](#)
- **The City of Fitchburg Water Utility began installation of the Advanced Metering Infrastructure (AMI)** system for water meter reading and residential cross connection survey.

WASTE

- **[Med-Drop Collection](#)** - Approximately 1, 250 lbs. of medication were collected from the Fitchburg Police Department's permanent MedDrop Box in 2013.
- **Recycling Drop Off Site Signage Update** – Signage at Fitchburg's Recycling Drop Off Site was refreshed and certain dumpsters were converted to accepting cardboard only, significantly decreasing the amount of contamination occurring at the site.
- **98 [Construction and Demolition Reuse/Recycling](#) permit applications were submitted in 2013 along with 4 final CDRR reports (4% final report compliance rate).**
- **The Household [Organics Collection Pilot](#) report was completed in October and details the two year pilot.**
- **Fitchburg Plastic Bag Ordinance Passes** – The Fitchburg Common Council approved an update to the Solid Waste and Recycling Ordinance that requires residents to not put clean, recyclable plastic bags in their green curbside refuse collection carts.
- **Two Electronics Recycling and Shred Day Events** - Approximately 1600 electronics collected and 5 tons of paper shredded for recycling in spring and fall 2013.

LEGACY COMMUNITIES SUSTAINABLE STRATEGIES

A copy of the Legacy Communities Sustainable Strategy Spreadsheet (aka Appendix 3 of the Legacy Communities Charter) is included as an attachment to this report for years 2011, 2012, 2013, 2014 and 2015. The baseline year (2011) was ~164 out of 325 points. We estimated ~198 points in 2012 and ~225 in 2013. The goals for 2014 and 2015 are ~229 and ~250 points, respectively.

1000 Friends of Wisconsin

Legacy Communities - a Green Tier Charter

C O W S center on wisconsin strategy
Building a high-road economy in Wisconsin and beyond.



City of Fitchburg 2011 Baseline*

City of Fitchburg 2012 Update*

City of Fitchburg 2013 Update*

City of Fitchburg 2014 Goal*

City of Fitchburg 2015 Goal*

Field Value

Wisconsin Legacy Communities Strategy Options

(Last Revised 12-21-13 by Rick Eilertson)

The purpose of the strategy options matrix is to provide a broad list of best management practices that encompass several elements of sustainability including transportation, energy, land use, water, and waste. This list is not inclusive.

Prospective signatories should use the strategy options to gauge environmental performance and then use this baseline to strive for superior results.

Superior environmental performance may be achieved when municipalities use the strategy options to develop a sustainability plan that reduces their overall negative impact on the environment.

TRANSPORTATION DEMAND MANAGEMENT:

Transportation demand management strategies aim to reduce GHG emissions and VMT by influencing change in individual behavior. These strategies encourage walking, bicycling, and transit as modes of transportation within a community and seek to curb the number and length of trips by vehicle.

The numbers below are estimates made by Kristofer Canto, Ahna Bizjak & Rick Eilertson as of 12-21-13.

Bicycle and Pedestrian Programs/Projects

2	Require bike parking for all new non-residential and multifamily uses.	2	2	2	2	2
1	Set standards for placement and number (as function of intensity of use) for bike parking spaces.	1	1	1	1	1
3	Commuter bike routes identified and cleared.	3	3	3	3	3
5 to 10	League of American Bicyclists certification. (Bronze 5, Silver 7, Platinum 10)	0	5	5	5	7
3	Funded and operating SRTS program (or functional equivalent) covering at least 10 percent of students.	0	1	1	1	1
1	Conduct annual survey of students' mode of transport to school.	0	0	0	0	0
	<u>Employer-Based Programs</u>					
5	Require large employers seeking rezoning to set a price signal (cash-out or charge).	0	0	0	0	0
5	Require large employers seeking rezoning to provide subsidized transit.	0	0	0	0	0
5	Require large employers seeking rezoning to provide a TDM plan that would reduce trips by 20 percent over business as usual.	0	0	1	1	1
	<u>Traffic Volume</u>					
3	Track VMT or traffic counts and report on efforts at reduction (including those on this list).	2	2	2	2	2
3	Eliminate parking minimums from non-residential districts.	0	0	0	0	0
5	Set parking maximums at X per square feet for office and retail uses.	0	0	0	0	0
5	Scheduled transit service at basic level (hour peak service within half-mile of 50 percent of addresses).	1	1	1	1	1
10	Scheduled transit service at enhanced level (half-hour peak service within 75 percent of addresses).	2	2	2	2	2

TRANSPORTATION SYSTEM MANAGEMENT

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A T T I O N	Transportation system management strategies aim to reduce GHG emissions and VMT by improving the overall performance of a transportation system. These strategies improve existing infrastructure, introduce new technology, and plan for the future of the system.									
	<u>Preservation and Improvement</u>									
	3	Develop and fully fund comprehensive maintenance program for existing roads.			3	3	3	3	3	
	1 to 5	Charge impact fees for new roads.			0	0	0	0	0	
	5	Calculate lane-miles per capita for arterials and collectors, and show reductions			2	2	2	3	3	
	5	Prepare a plan identifying disconnections in bike and pedestrian networks, prioritizing fixes and identifying potential funding sources for the most important projects.			3	4	4	5	5	
	5	Any proposal to add lanes to a two-lane roadway shall be evaluated for a center turn lane, the preferred option over an expansion to four lanes.			0	0	2	2	3	
	3	Identify four-lane roadways with fewer than 20,000 vehicles per day (AADT) and evaluate them for "road diets" with bike lanes or on-street parking			2	2	3	3	3	
	<u>Electric Vehicles</u>									
	1	Allow NEVs on appropriate roadways.			1	1	1	1	1	
	2	Provide public charging stations			1	2	2	2	2	
	<u>Vehicle Idling</u>									
2	Ban idling (more than 5 minutes) with local government vehicles.			2	2	2	2	2		
5	Ban idling (more than 5 minutes) community-wide.			1	2	3	3	3		
ZONING AND DEVELOPMENT										
Zoning and development strategies work toward improving the overall environmental, economic, and social health of a community by promoting mixed-use and infill development, walkable neighborhoods, and an overall sustainable lifestyle.										
<u>Infill Development</u>										
5	Identify priority areas for infill development, including those eligible for brownfields funding.			5	5	5	5	5		
1	Create land bank to acquire and assemble priority infill sites			0	0	0	0	0		
1	Develop an inventory of known contaminated properties for reuse planning, with possible GIS application			0	1	1	1	1		
<u>Walkscore</u>										
10	Measure Walkscore at 10 random residential addresses per Census tract, compute average, and improve upon overall score			0	5	10	10	10		
<u>Zoning</u>										
5	Adopt traditional neighborhood design ordinance (If population is less than 12,500)			5	5	5	5	5		
5	Zoning for office and retail districts permits floor-area ratio > 1, on average.			3	3	3	3	3		
8	Zoning for office and retail districts requires floor-area ratio > 1, on average.			0	0	0	0	0		
5	Zoning code includes mixed use districts			5	5	5	5	5		
8	Mixed-use language from Smart Code TBA.			8	8	8	8	8		
NATURAL RESOURCE MANAGEMENT										
Natural resource management strategies seek to conserve, preserve, protect and promote a community's greenspace, wildlife, wetlands and waterways for this and future generations by promoting pervious surfaces and adequate setbacks.										
<u>Canopy</u>										
L A N D U S E										

3	Adopt tree preservation ordinance per GTLC standards.	0	1	2	2	3
4	Set a tree canopy goal and develop a management plan to achieve it	0	1	3	3	3
2	Require trees to be planted in all new developments	2	2	2	2	2
2	Certification as Tree City USA	2	2	2	2	2
	<u>Vegetation Management</u>					
2	Public properties and rights of way mown or cleared only for safe sightlines and/or to remove invasive species.	1	1	1	1	1
2	Create community policy and BMP guidelines on minimizing chemical use during vegetation management of public and private properties	0	0	1	1	2
	<u>Water Protection</u>					
10	Establish 75-foot natural vegetation zone by surface water.	10	10	10	10	10
5	Inventory wetlands and ensure no net annual loss.	2	3	3	3	3
	<u>COMMUNITY ENERGY USE</u>					
	Community energy use strategies encourage energy efficiency and the use of renewable fuels to reduce total energy consumption throughout the community					
	<u>Community Energy Use Policies</u>					
6	Use PACE financing	0	0	0	0	0
1	Watt meters available to the public	1	1	1	1	1
10	Adopt Residential Energy Conservation Ordinance (time-of-sale certification and upgrades).	0	0	0	0	0
	<u>Measuring Community Energy Use</u>					
4	Work with local utilities to calculate total electricity and natural gas consumption annually, beginning with the fifth year before entering the program.	4	4	4	4	4
1	State of Wisconsin Energy Independent (EI) Community designation.	1	1	1	1	1
	<u>MUNICIPAL ENERGY USE</u>					
	Municipal energy use strategies encourage municipal employees to conserve energy, preserve the environment, and decrease greenhouse gas emissions from municipal facilities, services, and vehicle fleets.					
	<u>Government Energy Use Policies</u>					
5	Include transportation energy/emissions as criterion in RFPs for purchases of goods over \$10,000.	0	0	0	0	0
3	Develop list of lighting, HVAC and shell improvements to raise Energy Star Portfolio Manager or LEED EBO&M score	0	1	2	3	3
3	Reduce motor fuels use for non-transit activities --	1	2	2	2	3
6	Provide transit passes at 50 percent or more off the regular price and/or provide parking cash-out options for local government employees.	0	0	0	0	0
5	Streetlights operate at 75 lumens/Watt or higher	5	5	5	5	5
3	Stoplights are LED or functional equivalent	3	3	3	3	3
5	Municipal electricity purchases are at least 5 percentage points higher in renewable content than the statewide renewable portfolio standard requires. Calculation may include self-generated power and purchased offsets.	3	3	3	3	5
	<u>Measuring Government Energy Use</u>					
5	Complete EPA Energy Star Portfolio Manager spreadsheet for government energy use. Or score existing buildings with LEED EBO&M.	1	5	5	5	5
2	Calculate annual government fleet use of motor fuels, in gallons of petroleum and biofuels, beginning with the fifth year before entering the program.	1	2	2	2	2
10	All new and renovated municipal buildings must meet LEED Silver or greater.	5	5	5	5	10

WATER USE CONSERVATION	
Water Conservation strategy options set baselines and goals for water and energy performance in municipalities. They measure progress and promote water conservation by the government, business, and the community at-large.	
	<u>Water Conservation</u>
6	Track water and sewer use annually, beginning with fifth year before entering program, and develop plan for reductions.
4	Develop a water loss control plan with targets below the 15% required by the state and include a system-wide water audit implementation and time table
2	Join EPA's WaterSense Program for water utilities or the Groundwater Guardian Green Sites program and promote them to local business.
6	Use block rates and flat rates to encourage water conservation among residential, commercial, and industrial users.
1	Financial assistance for sewer lateral replacements.
2 to 6	Upgrade water utility equipment (e.g., variable frequency drive motors) to achieve energy efficiency.
3	Infiltration and inflow reduction by 10%
5	Wastewater biogas captured and used in operations.
5	Plan for replacing all toilets using > 1.6 gpf and annual progress sufficient to reach 90 percent replacement in 10 years.
	<u>Local Government Use</u>
2	Install waterless urinals in men's restrooms at municipal facilities (city hall, parks, etc.)
3	All outdoor watering by local government, excluding parks and golf courses, from rain collection.
4	Develop a water efficiency and conservation plan for municipal buildings
STORMWATER MANAGEMENT	
Stormwater Management strategy options encourage the use of best management practices to achieve a reduction in the amount of harmful pollutants introduced to our streams, rivers, and lakes.	
3	Develop a regular street sweeping program to reduce total suspended solids
3	Stormwater utility fees offer credits for best management practices such as rain barrels, rain gardens, and pervious paving
2	Inventory all paved surfaces (e.g., by GIS mapping), and develop a plan for reduction
2	Work with commercial or light industrial businesses to develop stormwater pollution plans
WATER AND DEVELOPMENT	
Water and Development strategy options link water conservation and the preservation of land, wetlands, and wildlife habitat while promoting compact development, restoration and rehabilitation efforts, and long-term planning.	
	<u>Land Development</u>
5	Identify key green infrastructure areas during plan development and/or implement a plan to acquire and protect key green infrastructure areas
	<u>Waters, Wetlands, and Wildlife</u>
1 to 6	Replace concrete channels with re-meandered and naturalized creeks, wetlands, or swales
3	Develop a system for identifying culverts that obstruct fish migration and install fish friendly culverts where needed
4	Provide incentives for protection of green infrastructure, sensitive areas, important wildlife habitat, or for the restoration or rehabilitation of wetlands or other degraded habitats such as credit towards open space or set-aside requirements
WASTE MANAGEMENT AND REDUCTION	
Waste Management and Reduction strategy options encourage municipalities and their citizens to divert organics and recyclables from landfills and properly dispose of hazardous materials in an effort to reduce waste in a community.	
3	Community waste stream monitored at least annually . Waste reduction plan prepared and updated annually

6	6	6	6	6
4	4	4	4	4
2	2	2	2	2
5	5	5	5	5
0	0	0	0	0
6	6	6	6	6
3	3	3	3	3
3	3	3	3	3
3	3	5	5	5
0	0	1	1	1
2	3	3	3	3
0	0	2	3	4
3	3	3	3	3
3	3	3	3	3
2	2	2	2	2
0	1	2	2	2
5	5	5	5	5
2	3	4	4	5
1	1	3	3	3
2	3	4	4	4
3	3	3	3	3

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4	Waste and materials management plan based on "zero-waste" principles, with specific goals, prepared and updated annually	2	3	3	3	4
3	Construction/deconstruction waste recycling ordinance	2	3	3	3	3
3	Mandatory residential curbside recycling pickup that covers paper, metal cans, glass and plastic bottles	3	3	3	3	3
5	Develop a municipal collection program that encourages the diversion of food discards, yard materials, and other organics from landfills to composting or anaerobic digestion with energy recovery	2	4	4	4	5
3	Develop and promote programs that dispose of household hazardous, medical, and electronic waste	3	3	3	3	3
4	Use anaerobic digesters to process organic waste and produce energy	0	0	0	0	4
3	Implement municipal ordinances requiring manufacturer takeback for fluorescent bulbs, thermostats and other mercury-containing devices	0	0	1	1	1
2	Ordinances in place to reduce the usage of phone books as well as single-use shopping bags, styrofoam food containers and other disposable packaging	0	1	2	2	2
2	Pay-as-you-throw system implemented by municipality or required of private waste haulers	2	2	2	2	2
1	Use public education and outreach to promote recycling, backyard composting, product re-use and waste reduction	1	1	1	1	1
325		164	198	225	229	250
		50%	61%	69%	70%	77%

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1	Conduct annual survey of students' mode of transport to school.	0	0	0	0	0
	<u>Employer-Based Programs</u>					
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<u>Canopy</u>										
L A N D U S E										

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1	Watt meters available to the public	1	1	1	1	1
10	Adopt Residential Energy Conservation Ordinance (time-of-sale certification and upgrades).	0	0	0	0	0
	<u>Measuring Community Energy Use</u>					
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3	Stoplights are LED or functional equivalent	3	3	3	3	3
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	<u>Measuring Government Energy Use</u>					
5	Complete EPA Energy Star Portfolio Manager spreadsheet for government energy use. Or score existing buildings with LEED EBO&M.	1	5	5	5	5
2	Calculate annual government fleet use of motor fuels, in gallons of petroleum and biofuels, beginning with the fifth year before entering the program.	1	2	2	2	2
10	All new and renovated municipal buildings must meet LEED Silver or greater.	5	5	5	5	10

WATER USE CONSERVATION	
Water Conservation strategy options set baselines and goals for water and energy performance in municipalities. They measure progress and promote water conservation by the government, business, and the community at-large.	
	<u>Water Conservation</u>
6	Track water and sewer use annually, beginning with fifth year before entering program, and develop plan for reductions.
4	Develop a water loss control plan with targets below the 15% required by the state and include a system-wide water audit implementation and time table
2	Join EPA's WaterSense Program for water utilities or the Groundwater Guardian Green Sites program and promote them to local business.
6	Use block rates and flat rates to encourage water conservation among residential, commercial, and industrial users.
1	Financial assistance for sewer lateral replacements.
2 to 6	Upgrade water utility equipment (e.g., variable frequency drive motors) to achieve energy efficiency.
3	Infiltration and inflow reduction by 10%
5	Wastewater biogas captured and used in operations.
5	Plan for replacing all toilets using > 1.6 gpf and annual progress sufficient to reach 90 percent replacement in 10 years.
	<u>Local Government Use</u>
2	Install waterless urinals in men's restrooms at municipal facilities (city hall, parks, etc.)
3	All outdoor watering by local government, excluding parks and golf courses, from rain collection.
4	Develop a water efficiency and conservation plan for municipal buildings
STORMWATER MANAGEMENT	
Stormwater Management strategy options encourage the use of best management practices to achieve a reduction in the amount of harmful pollutants introduced to our streams, rivers, and lakes.	
3	Develop a regular street sweeping program to reduce total suspended solids
3	Stormwater utility fees offer credits for best management practices such as rain barrels, rain gardens, and pervious paving
2	Inventory all paved surfaces (e.g., by GIS mapping), and develop a plan for reduction
2	Work with commercial or light industrial businesses to develop stormwater pollution plans
WATER AND DEVELOPMENT	
Water and Development strategy options link water conservation and the preservation of land, wetlands, and wildlife habitat while promoting compact development, restoration and rehabilitation efforts, and long-term planning.	
	<u>Land Development</u>
5	Identify key green infrastructure areas during plan development and/or implement a plan to acquire and protect key green infrastructure areas
	<u>Waters, Wetlands, and Wildlife</u>
1 to 6	Replace concrete channels with re-meandered and naturalized creeks, wetlands, or swales
3	Develop a system for identifying culverts that obstruct fish migration and install fish friendly culverts where needed
4	Provide incentives for protection of green infrastructure, sensitive areas, important wildlife habitat, or for the restoration or rehabilitation of wetlands or other degraded habitats such as credit towards open space or set-aside requirements
WASTE MANAGEMENT AND REDUCTION	
Waste Management and Reduction strategy options encourage municipalities and their citizens to divert organics and recyclables from landfills and properly dispose of hazardous materials in an effort to reduce waste in a community.	
3	Community waste stream monitored at least annually . Waste reduction plan prepared and updated annually

6	6	6	6	6
4	4	4	4	4
2	2	2	2	2
5	5	5	5	5
0	0	0	0	0
6	6	6	6	6
3	3	3	3	3
3	3	3	3	3
3	3	5	5	5
0	0	1	1	1
2	3	3	3	3
0	0	2	3	4
3	3	3	3	3
3	3	3	3	3
2	2	2	2	2
0	1	2	2	2
5	5	5	5	5
2	3	4	4	5
1	1	3	3	3
2	3	4	4	4
3	3	3	3	3

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4	Waste and materials management plan based on "zero-waste" principles, with specific goals, prepared and updated annually	2	3	3	3	4
3	Construction/deconstruction waste recycling ordinance	2	3	3	3	3
3	Mandatory residential curbside recycling pickup that covers paper, metal cans, glass and plastic bottles	3	3	3	3	3
5	Develop a municipal collection program that encourages the diversion of food discards, yard materials, and other organics from landfills to composting or anaerobic digestion with energy recovery	2	4	4	4	5
3	Develop and promote programs that dispose of household hazardous, medical, and electronic waste	3	3	3	3	3
4	Use anaerobic digesters to process organic waste and produce energy	0	0	0	0	4
3	Implement municipal ordinances requiring manufacturer takeback for fluorescent bulbs, thermostats and other mercury-containing devices	0	0	1	1	1
2	Ordinances in place to reduce the usage of phone books as well as single-use shopping bags, styrofoam food containers and other disposable packaging	0	1	2	2	2
2	Pay-as-you-throw system implemented by municipality or required of private waste haulers	2	2	2	2	2
1	Use public education and outreach to promote recycling, backyard composting, product re-use and waste reduction	1	1	1	1	1
325		164	198	225	229	250
		50%	61%	69%	70%	77%