

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Office of the Executive Director

June 3, 2011

To: Chair Nancy Sutley, Council on Environmental Quality
Director Jacob Lew, Office of Management and Budget

Subject: Executive Order 13514, Sustainability Plan

The Federal Trade Commission hereby submits its Sustainability Plan for our Headquarters Building at 600 Pennsylvania Avenue, NW, Washington, DC.

We will continue to review developing sustainable technology and initiate improvements based on economic and social benefits. We also will continue to report these improvements to your offices and to maintain transparency to the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Eileen Harrington".

Eileen Harrington
Executive Director
Senior Sustainability Officer
Federal Trade Commission

CC: Jon Carson, Council on Environmental Quality
Michelle Moore, Council on Environmental Quality
Melissa Green, Office of Management and Budget
Sally Ericsson, Office of Management and Budget
Cynthia Vallina, Office of Management and Budget

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Office of the Executive Director

June 3, 2011

To: Chair Nancy Sutley, Council on Environmental Quality
Director Jacob Lew, Office of Management and Budget

Subject: Executive Order 13514, Agency Sustainability Plan

Agency Policy Statement

The Federal Trade Commission (FTC) commits to compliance with all environmental and energy statutes, regulations and Executive Orders. The FTC currently maintains existing programs related to recycling of all paper, glass and plastics; use of high efficiency fluorescent lighting; and providing motion sensitive lighting controls for all offices in our Headquarters Building at 600 Pennsylvania Avenue, NW, Washington, DC.

Even with these measures in place the FTC realizes there are opportunities for further improvement. To support the Executive Order and further reduce our Greenhouse Gas (GHG) emissions the FTC will continue to encourage the increased use of mass transit by all staff, utilization of teleconferencing to reduce travel by employees whenever possible and purchasing only energy efficient equipment for the Headquarters Building.

Currently the FTC provides the maximum allowable transit subsidy benefit of up to \$230.00 pre-tax each month to all eligible employees. We have included our baseline information in our Scope 3 response. Using this data as a starting point, we will initiate programs to inform staff further of the importance and impacts of their commuting choices towards the environment.

The FTC continues to increase the use of our teleconferencing program throughout the agency by installing state-of-the-art audio and video equipment at our Headquarters Building and at all eight of our regional offices. This equipment provides the ability for staff to meet on a regular basis without the need for extensive travel. We maintain a baseline record of employee travel and our hope is that through a concerted effort focused on time savings and education we can further reduce employee travel.

The FTC has committed to only purchasing electro-mechanical items with the highest efficiency ratings. Examples of these items that we have started phasing in are low-flow water valves and high efficiency rated compressors. These changes can be easily tracked and have no negative impact on our operational budget since these are normal wear items.

Sustainability and the Agency Mission

The mission of the FTC is to protect consumers and maintain competition in the American marketplace. The true spirit of these goals is to show leadership to the American public by our thoughts and actions in the free enterprise business system.

Reinforcing the importance to our staff of their impact on the environment along with improvements to our purchasing of resources will blend with staff's institutional knowledge of current government initiatives.

By providing a more efficient and globally centric environment for our staff we will remain poised to help the American public through our knowledge and understanding of technologies and their risks.

Summary of size and scope of the Federal Trade Commission operations

Total # of Employees	1,200
Total Acres of Land Managed	0
Total # of Facilities Owned	0
Total # of Facilities Leased (GSA lease)	12
Total # of Facilities Leased (Non-GSA)	0
Total Facility Gross Square Feet (GSF)	641,093
Operates in # of Locations throughout U.S.	9
Operates in # of Locations outside of U.S.	0
Total # of Fleet Vehicles Owned	0
Total # of Fleet Vehicles Leased	4
Total # of Exempted-Fleet Vehicles (Tactical, Emergency, Etc.)	0
Total Operating Budget FY 2010 (\$MIL)	291.2
Total # of Contracts Awarded FY 2010	900
Total Amount of Contracts Awarded FY 2010 (\$MIL)	74.8
Total Amount Spent on Energy Consumption FY 2010 (\$MIL)	1.730
Total MBTU Consumed per GSF	34.52
Total Gallons of Water Consumed per GSF	0.088
Total Scope 1&2 GHG Emissions (Comprehensive) FY 2008 Baseline MMTCO _{2e}	5.546
Total Scope 1&2 GHG Emissions (Subject to Agency Scope 1&2 Reduction Target) FY 2008 Baseline MMTCO _{2e}	5.546
Total Scope 3 GHG Emissions (Comprehensive) FY 2008 Baseline MMTCO _{2e}	1.561
Total Scope 3 GHG Emissions (Subject to Agency Scope 3 Reduction Target) FY 2008 Baseline MMTCO _{2e}	1.561

Greenhouse Gas Reduction Goals

Under our Scope 2 submission, the FTC commits to a green house gas reduction target of 4.4% of our current totals by 2020 for our Headquarters Building located at 600 Pennsylvania Avenue, NW, Washington, DC. We will review developing sustainable technology and initiate improvements based on economic and social benefits; and will continue to report these improvements to your offices and to maintain transparency to the public.

Plan Implementation

The Apex building at 600 Pennsylvania Avenue, NW was constructed in 1937 and is the home of the Federal Trade Commission headquarters. Due to the type of construction, there are limitations on what can be altered to make the facility more efficient. As an example, heat is supplied to the facility via steam pipes connected to the General Services Administration (GSA) steam plant. Our initial investigation into the possibility of producing our own heat for building services determined there would be huge outlays of funds required for a connection to a natural gas line and the infrastructure to provide an internal steam source within the building's limited space. Combining these costs with the increase in utility costs for natural gas, it was determined that this expense was not currently feasible.

Phase one of our plan is to make sure all FTC staff are aware of the resources available to them through the transit subsidy program which encourages use of the Washington Metropolitan Area Transit Authority system. In addition to the enrollment forms, we will conduct an outreach campaign with applicable data to all staff on how using different forms of transportation can reduce GHG emissions. We will also encourage use of alternative means for commuting such as bicycles and carpools.

Phase two of our plan is to overlay GHG emission data on employee travel versus the use of teleconferencing. Redefining the old axiom "Time is Money" as "Time is Money and Energy" supports a program of time management as to where staff can be the most productive while reducing their impact on GHG emissions. This program will require feedback from staff and will evolve over the next several years.

Phase three of our plan will utilize investigative tactics to determine the most efficient means of purchasing components that utilize purchased resources, such as water, steam and electricity. The FTC purchases replacement components each year consisting of water and steam valves and compressors for our HVAC system. The FTC commits to purchasing replacement systems based on their overall efficiency as the deciding factor.

This three phase approach will be productive as we continue to enlighten staff on GHG emissions and to come to a "think before you use" state of mind. At the same time, it will not require separate funding nor will it be disruptive to the FTC's work. The goal is to have an educated staff that maintains a global awareness of GHG emissions and the consequences.

Table 1 Critical Planning Coordination

Originating Report / Plan	Scope 1 & 2 GHG Reduction	Scope 3 GHG Reduction	Develop and Maintain Agency Comprehensive GHG Inventory	High-Performance Sustainable Design / Green Buildings	Regional and Local Planning	Water Use Efficiency and Management	Pollution Prevention and Waste Elimination	Sustainable Acquisition	Electronic Stewardship and Data Centers	Agency Specific Innovation
"Sample Plan"	Yes	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Yes	No
GPRA Strategic Plan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Agency Capital Plan	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
A-11 300s	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Annual GHG Inventory and Energy Data Report	yes	yes	yes	n/a	n/a	Yes	Yes	Yes	Yes	Yes
EISA Section 432 Facility Evaluations/Project Reporting/Benchmarking	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Budget	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Asset Management Plan / 3 Year Timeline	Yes	Yes	Yes	n/a	Yes	n/a	Yes	Yes	Yes	Yes
Circular A-11 Exhibit 53s	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
OMB Scorecards	Yes	Yes	Yes	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DOE's Annual Federal Fleet Report to Congress and the President ¹	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Data Center Consolidation Plan	n/a	n/a	n/a	n/a	Yes	n/a	n/a	Yes	Yes	Yes
Environmental Management System ²	Yes	Yes	Yes	n/a	n/a	n/a	n/a	n/a	n/a	m/a
Instructions for Implementing Climate Change Adaptation Planning	n/a	n/a	n/a	n/a	Yes	n/a	n/a	n/a	n/a	n/a
Other (reports, policies, plans, etc.) ³	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

¹ EPAct

² Agencies that have a Compliance Management Plan rather than an Environmental Management System should modify the table accordingly.

³ Sustainable Building Implementation Plans, Sustainable Procurement (also known as Green or Affirmative Procurement, or Green Purchasing), Electronic Stewardship Plans, Chemical Reduction Plans, Pollution Prevention Plans, Compliance Management Plans, etc.

Evaluating Return on Investment

The FTC plans to review developing sustainable technology and to initiate improvements based on economic and social benefits. Initially, we feel that most of these enhancements can be accomplished through normal repair and operations budgeting between 2011 and 2020.

Transparency

The FTC will continue to report these improvements to your offices and to maintain transparency to the public via our FTC.gov website.

Performance Review and Annual Update

Summary of Accomplishments

During these times of ever-tightening federal budgets, we at the FTC feel there are means by which we can increase the efficiency of our facility by utilizing the annual budget to make sound decisions and purchases based on research of total cost of ownership.

As an example of increasing efficiency, the FTC has undertaken a project to refurbish the exterior doors to our Headquarters Building resulting in cost and energy savings. This refurbishment will not only make the doors more secure but will also reduce the loss of conditioned air.

We have also taken steps to reduce our use of copier paper by eliminating separation pages and establishing double-sided copying as the default setting for copiers.

Our facilities department team has coordinated their efforts with the manufacturer of our chillers and compressors to optimize the duty cycle of the building's cooling system. The savings with this action will not only reduce energy consumption but should also increase the life of the components. All of these items were accomplished without the need for requesting additional funds nor have we neglected any portion of our maintenance programs.

In conjunction with the Office of the Executive Director (OED), the FTC has formed an Energy Reduction Team. The team consists of staff who represent the Office of the Chief Information Officer, facilities, and transportation offices who are working on a three phase program that will educate and encourage staff to reduce environmental impacts at work and in their home life as well.

Goal Performance Review

Under current requirements the commission is fully staffed to support all goals listed below.

Scope 1 & 2 Greenhouse Gas Reduction

The FTC does not combust gasses and it does not process wastewater or solid waste onsite. We do purchase electricity and steam for our Headquarters Building. We are working with our Energy Reduction Team to investigate off-sourcing a portion of our data center, and through green acquisitions, purchase replacement components over-time that will be more efficient, which will reduce costs and negative impact on the environment. Our reduction goal is 4.4%.

Scope 3 GHG Reduction

Our Energy Reduction Team is working on an educational based system to encourage staff to video and teleconference as opposed to travel whenever possible; we are searching for methods to further encourage use of mass transit. Currently 80% of our Washington, DC based staff utilize some form of mass transit to commute to work each day. Further, we are continuing our efforts to reduce water use by purchasing low-flow valves and reviewing any bulk use of water in the facility.

High Performance Sustainable Designs/Green Buildings and Regional and Local Planning

Currently the staff of the Administrative Services Office is not seeking a replacement facility for the Headquarters Building. If a new facility is required for our staff for any reason, we have the ability to source LEED certified structures to better serve our mission and the environment. Our staff works closely with the National Capital Planning Commission and General Services Administration to stay abreast of all regional and local planning programs.

Water Use Efficiency and Management; Pollution Prevention and Waste Reduction

We have placed meters in specific areas of our Headquarters Building to measure water use in each major portion of the facility. Working from the baseline, our plan is to be able to measure any savings that may be accomplished through introduction of low-flow valves and bulk use of water, such as watering of plants and trees in the landscaped areas that surround our building.

Through programs such as tele-work and compressed work schedules, our hope is that we reduce overall water usage, greenhouse gas emissions and solid waste disposal from our headquarters facility.

Sustainable Acquisition

The Energy Reduction Team works closely with our Financial Management Office to procure only the most efficient products for all of our facilities. We view acquisition as the beginning of the process of total cost of ownership. Our staff researches not only the products but the vendors to make sure we obtain the best value for the government and the taxpayers.

Electronic Stewardship and Data Centers

The FTC's Chief Information Officer is researching the use of cloud computing to off load utility usage as a long term solution to energy reduction. In the interim, we are still utilizing Green IT to reduce energy consumption with our present configuration.

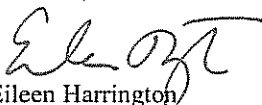
Agency Specific Innovation

Our Energy Reduction Team is reviewing emerging ideas and designs to determine if they would be a fit for our Headquarters Building. While our Headquarters Building is an historic structure, we feel that we can still accommodate a minimum level of renewable energy sources in our physical plant.

Agency Self Evaluation

As of this writing, the FTC feels we are on schedule to realize energy reduction to our target of 4.4% overall by 2020.

Best regards,



Eileen Harrington
Executive Director
Senior Sustainability Officer
Federal Trade Commission

Appendix 1

Since the FTC is not requesting additional funding for the implementation of our Sustainability Plan, there is no impact on the Circular A-11, Section 25 data call.

Appendix 2

Climate Change Adaptation Policy

It is the intention of the FTC to review, plan, and adapt our operations to address challenges posed by climate change. We will work to continue to reduce greenhouse gas emissions in our facilities and through our staff thereby limiting the extent that climate change impacts our environment. Whenever possible the FTC will follow the recommendations and strategies listed below.



Eileen Harrington
Executive Director
Senior Sustainability Officer
Federal Trade Commission

From the Council on Environmental Quality Task Force

Recommendations

Make adaptation a standard part of Agency planning to ensure that resources are invested wisely and services and operations remain effective in a changing climate.

Ensure scientific information about the impacts of climate change is easily accessible so public and private sector decision-makers can build adaptive capacity into their plans and activities.

Align Federal efforts to respond to climate impacts that cut across jurisdictions and missions, such as those that threaten water resources, public health, oceans and coasts, and communities.

Develop a U.S. strategy to support international adaptation that leverages resources across the Federal Government to help developing countries reduce their vulnerability to climate change through programs that are consistent with the core principles and objectives of the President's new Global Development Policy.

Build strong partnerships to support local, state, and tribal decision makers in improving management of places and infrastructure most likely to be affected by climate change.

Strategies

Adopt Integrated Approaches: Adaptation should be incorporated into core policies, planning, practices, and programs whenever possible.

Prioritize the Most Vulnerable: Adaptation strategies should help people, places, and infrastructure that are most vulnerable to climate impacts and be designed and implemented with meaningful involvement from all parts of society.

Use Best-Available Science: Adaptation should be grounded in the best-available scientific understanding of climate change risks, impacts, and vulnerabilities.

Apply Risk-Management Methods and Tools: Adaptation planning should incorporate risk-management methods and tools to help identify, assess, and prioritize options to reduce vulnerability to potential environmental, social, and economic implications of climate change.

Apply Ecosystem-based Approaches: Adaptation should, where appropriate, take into account strategies to increase ecosystem resilience and protect critical ecosystem services on which humans depend, to reduce vulnerability of human and natural systems to climate change.