



United States of America
Federal Trade Commission
Washington, D.C. 20580

Office of the Executive Director

November 16, 2012

To: Chair Nancy Sutley, Council on Environmental Quality
Deputy Director for Management Jeffrey Zients, Office of Management and Budget

Subject: 2013 Strategic Sustainability Performance Plan

The Federal Trade Commission hereby submits its 2013 Strategic Sustainability Performance 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
Sally Ericsson, Office of Management and Budget
Cynthia Vallina, Office of Management and Budget

Table of Contents

Federal Trade Commission.....	1
Section 1: Agency Policy and Strategy.....	2
I. Agency Policy Statement.....	2
II. Sustainability and the Agency Mission.....	2
III. Greenhouse Gas Reduction Goals.....	2
IV. Plan Implementation.....	3
V. Evaluating Return on Investment.....	3
VI. Transparency.....	3
Section 2: Executive Summary.....	4
I. Summary of Accomplishments.....	4
Section 3: Appendixes.....	5
Appendix A: Climate Change Adaptation Plan.....	5
Appendix B: Fleet Management Plan.....	6
Appendix C: Biobased Purchasing Strategy.....	7

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 \$125.00 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.

Greenhouse Gas Reduction Goals

Under our Scope 2 submission, the FTC commits to a greenhouse 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.

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.

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.

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 facilities department modified a containment wall which allows greater air circulation and heat cast-off for the headquarters building HAVC condenser units. 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 that 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.

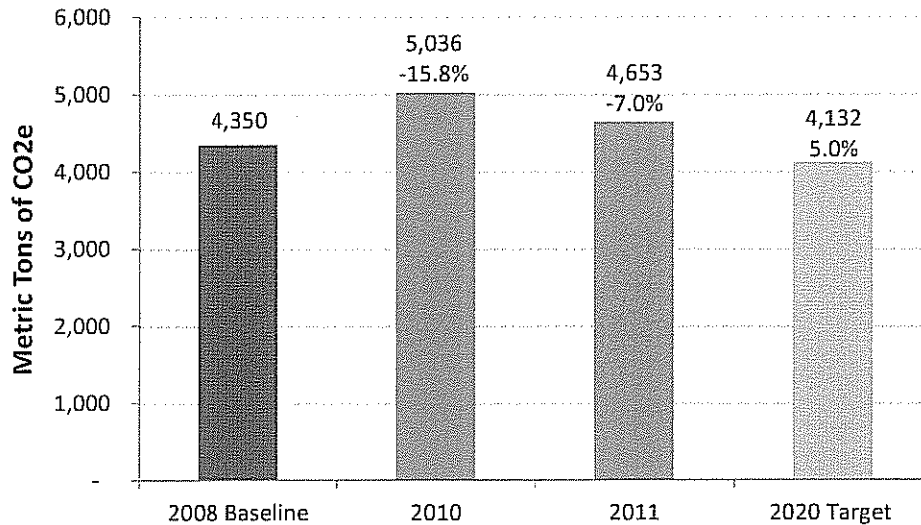
TABLE 1: SIZE AND SCOPE OF AGENCY OPERATIONS

Agency Size and Scope	FY 2011
Total Number of Employees as Reported in the President's Budget	1,200
Total Acres of Land Managed	0
Total Number of Facilities Owned	0
Total Number of Facilities Leased (GSA and Non-GSA lease)	12
Total Facility Gross Square Feet (GSF)	641,093
Operates in Number of Locations Throughout U.S.	9
Operates in Number of Locations Outside of U.S.	0
Total Number of Fleet Vehicles Owned	0
Total Number of Fleet Vehicles Leased	3

GOAL 1: GREENHOUSE GAS REDUCTION AND MAINTENANCE OF AGENCY COMPREHENSIVE GREENHOUSE GAS INVENTORY

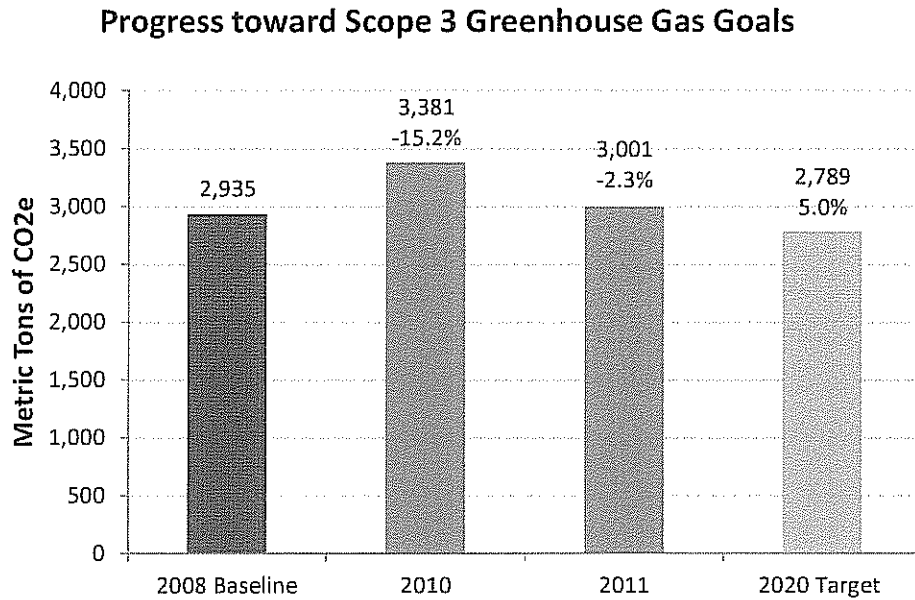
Agency-Specific Performance Metrics for Scope 1 & 2 GHG Emissions Reduction:

Progress toward Scope 1 & 2 Greenhouse Gas Goals



Note: E.O. 13514 requires each agency to establish a scope 1 & 2 GHG reduction target for FY2020. The target for this agency is 5% compared to FY2008. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline. A negative percentage reflects an increase in scope 1 & 2 GHG emissions.

Agency-Specific Performance Metrics for Scope 3 GHG Emissions Reduction:

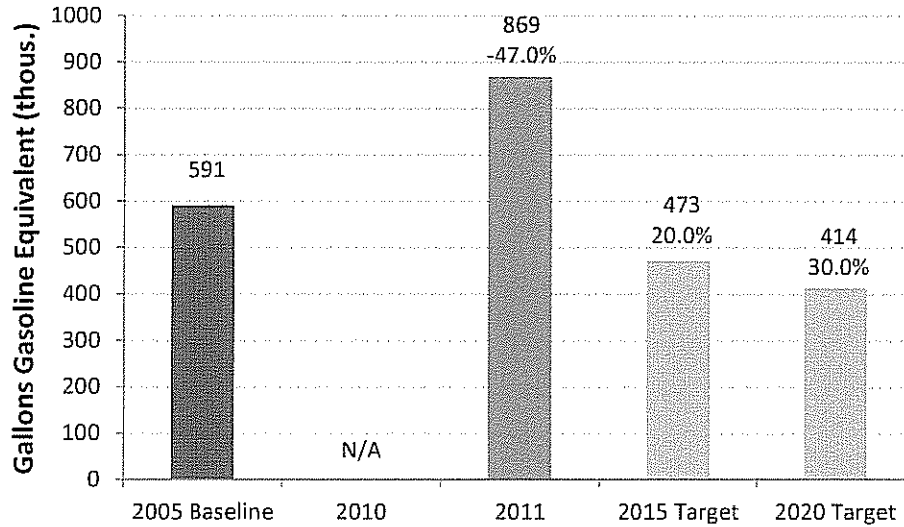


Note: E.O. 13514 requires each agency to establish a scope 3 GHG reduction target for FY2020. The FY2020 target for this agency is 5% compared to the FY2008 baseline. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline. A negative percentage reflects an increase in scope 3 GHG emissions.

GOAL 3: FLEET MANAGEMENT

Agency-Specific Performance Metrics for Fleet Petroleum Reduction:

Progress toward Fleet Petroleum Reduction Goals



Note: E.O. 13514 and EISA require that by FY2011 agencies reduce fleet petroleum use by 12%, compared to an FY2005 baseline. A 20% reduction is required by FY2015 and a 30% reduction is required by FY2020. The red bar represents the agency's FY2005 baseline. The green bars represent the FY2015 and FY2020 target reductions. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2005 baseline. A negative percentage reflects an increase in fleet petroleum use.

Appendix A:

Climate Change Adaptation Plan

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.

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.

Appendix B:

Fleet Management Plan

The FTC fleet does not require reporting due to fact that our fleet consists of two vehicles. Information on our fleet is reported in our Fleet Management Compliance Report on FTC.gov as required by the May 24, 2011 Presidential memorandum.

Appendix C:

Biobased Purchasing Strategy:

- The FTC will consider having our acquisition workforce take web-based training on www.biopreferred.gov.
- The FTC will also consider including biobased clauses and requirements in all janitorial and construction contracts.