



Commodity Futures Trading Commission

2013 Strategic Sustainability Performance Plan

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U.S. COMMODITY FUTURES TRADING COMMISSION

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Logistics and Operations

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Policy Statement

The Commodity Futures Trading Commission (CFTC) is fully committed to compliance with environmental and energy statutes, regulations, and Executive Orders (EOs). Our sustainability-related priorities for the upcoming year are the completion of our expansion program and the improved operational efficiency of our facilities and operations. In response to changes in the laws governing the regulation of markets, the CFTC just recently completed a period of extensive and rapid expansion of its operations and facilities. This required extensive modification of some of our facilities, most recently in Washington, DC and New York, NY. In considering how to approach the necessary construction, considerable thought was given to energy efficiency and environmental impact. Regarding the operation of our facilities, we have made significant efforts to reduce energy use, waste and water usage. These have been accomplished through a combination of technology and policy.

CANDACE A. TURNER, Chief
Logistics and Operations
Senior Sustainability Officer

Executive Summary

The CFTC is a small agency with offices in four locations, Washington, DC; New York, NY; Chicago, IL and Kansas City, MO. All are housed entirely within leased space. While being a tenant limits our ability to influence how the facilities themselves are operated, we have made a conscious effort over the years to consider the energy and environmental impacts of our leases and operational decisions.

Due to changes in the laws regulating commodities markets, CFTC has had to expand its staff and subsequently its facilities at all four locations over the past four years. The extent to which the facilities manage building systems to minimize the consumption of energy, water and materials was included among the evaluation criteria in deciding whether to relocate and if so, where. In the spirit of paragraph 2(f) of Executive Order 13514 regarding regional and local planning, we also included access to public transportation and pedestrian-friendly environment among the amenities considered in evaluating the sites in New York, Chicago and DC where we chose to expand in place, and Kansas City where we completely relocated. These projects are now substantially complete.

- We have developed effective relationships with our building managers in all locations, providing for the exchange of ideas and priorities. This has given us the opportunity to share our interest in energy efficiency and environmental stewardship in a way that results in positive change. For example, we have reviewed EO 13514 in great detail with the manager of our largest facility (DC). The manager voluntarily developed an action plan to implement policies and procedures that comply with the intent of the order as much as reasonably possible. We also actively participate with the “Green Office” program at our New York location.
- During CFTC’s expansion program, considerable thought was given to energy efficiency and environmental impact. For example, we have minimized the amount of alteration to our existing facilities needed to accommodate our new workforce structure. In doing so we have taken advantage of the required construction to upgrade HVAC systems, lighting and plumbing where applicable to increase energy efficiency and reduce water usage. Where appliances and equipment were no longer serviceable or approaching the end of their life cycle, we sought Energy Star certified replacements. An example is the replacement of all refrigerators in our DC office with newer, more efficient and reliable units. For our completed projects in DC and Kansas City, we were successful in obtaining LEED certification, including two at the Silver level and one at the Gold. Detailed supporting documents of these efforts are available. Construction activities themselves were monitored to minimize waste and reduce the requirement for long distance delivery of materials, furniture and equipment.
- Regarding operation of our facilities, we continue to exert significant efforts to reduce energy use, waste and water usage. This has been accomplished through a combination of technology and policy. For example, most rooms have motion sensing light switches. Individual space heaters are not allowed. We continue to use the highly successful Night Watchman IT management protocol that reduces IT electrical consumption by up to 70%. Nearly all plumbing fixtures have automatic, low-flow valves. Employees are admonished to turn off devices not in use. Office paper, metal and plastics are recycled and closely monitored by the building managers. Even small details like providing alcohol-based hand sanitizers are employed to reduce water consumption and waste paper.
- The U.S. Environmental Protection Agency (EPA) last year named the Beacon Capital Partners, an affiliate of the property owner of our Headquarters building, a 2012 ENERGY STAR Partner of the Year for strategically managing and improving the energy efficiency of its entire commercial office building portfolio. Through its partnership with the ENERGY STAR program, Beacon Capital has significantly reduced energy usage throughout its office building portfolio, saved money for its tenants, and reduced greenhouse gas emissions. This year in cooperation with Beacon, we participate in the “Lights Out” program which helps to assure that lights are not left on gratuitously. Over the past few years, a number of energy efficiency upgrades and operational improvements have been made at the CFTC Headquarters location to reduce energy usage. They include the CFTC support of the “LEED Silver” certification achieved for the Lafayette Centre, participation in the Enernoc load reduction program, the CFTC and owner installation of occupancy sensors and energy management system enhancements of the building’s HVAC system. Commercial buildings, like the CFTC’s Headquarters building that earn the ENERGY STAR use an average of 40% less energy than typical buildings and also release 35% less carbon dioxide into the atmosphere.

Travel:

CFTC employees commute and some must travel between office locations as a routine part of conducting business. To reduce the need for travel, increase operational efficiency and provide a positive work environment, CFTC employs a number of programs, policies and strategies. These also tend to reduce energy consumption.

- By far the most significant travel impact is associated with commuting. Of our four locations, only the smallest in Kansas City is not readily accessible by public transportation. To encourage the use of public transportation, CFTC participates in a transit subsidy program. Currently 78% of eligible CFTC employees participate in this very popular program.
- CFTC allows flexible work schedules. This program reduces the number of days employees must commute. We are also exploring ways to modify our business operation model to require even less commuting and to share office space where possible.
- CFTC also allows telework on a regular basis for some employees and episodically for others. This too reduces the need for employees to commute. With the long commuting distances typical of our three largest offices (DC, NYC and Chicago), even a small reduction in the number of trips can have a meaningful impact in reducing energy consumption, and production of air pollutants and GHG.
- Business travel has been significantly reduced by the application of video-teleconferencing technology, which all four of our offices employ routinely. Where travel is unavoidable, we typically make an effort to combine as many activities as possible into a given trip. For example, combining a trip to our Kansas City and Chicago offices from DC saves a significant number of flight miles vice two separate trips.

Electronics Stewardship (ref. also E.O. 13423)

- ✓ More than 95% of current CFTC equipment addressed by [Electronic Product Environmental Assessment Tool](#) (EPEAT) (workstations, displays, notebooks) meets EPEAT requirements.
- * CFTC computers and monitors are configured for performance rather than power saving based on mission need to support telework and effective mobile computing.
- * CFTC does not have policies that specifically address extending the useful life of electronic equipment.
- ✓ CFTC uses GSA to dispose of electronic equipment.
- ✓ CFTC complies with the following [requirements of the Federal Electronics Challenge](#):
 - Find energy efficient electronic equipment.
 - Require energy efficient electronic equipment in acquisition and procurement documents.
 - Develop or update purchasing policies, procedures and guidance, to require acquisition of energy efficient electronic equipment.
 - Gather information about electronic equipment that must be power managed (computer desktops, notebooks/laptops and monitors).
 - Investigate implementation options for local and/or network power management.
 - Activate power management (printers and copiers).
 - Enable duplexing (double-sided) features on imaging equipment and connected computers.
 - Streamline acquisition and use of imaging equipment.
 - Reduce resource use by imaging equipment.
 - Extend the life of existing electronic equipment.
 - Evaluate requests for new electronic equipment purchases.
 - Evaluate remote desktop solutions (e.g., thin client) to reduce hardware and software distribution to individual users.
 - Educate employees on how to improve operation and maintenance of electronic equipment.
- * CFTC does not comply with the following requirements of the Federal Electronics Challenge:

- *Record or track annual purchases and leases of energy efficient electronic equipment for necessary reporting.*
- *Track and maintain power management settings.*
- *Develop or update IT operation and maintenance policies, procedures and guidance, to ensure continued power management.*
- *Track power management compliance for necessary reporting.*
- *Turn off/power down electronic equipment at the end of each work day and/or over weekends and holidays (based on mission need to support telework and effective mobile computing).*
- *Limit the number of computers per user to one (either desktop or portable) (based on mission need to support telework, effective mobile computing, and improve security by favoring the use of CFTC-controlled rather than personal devices).*
- *Evaluate leasing of electronic equipment or seat management.*
- *Plan for reuse, donation and recycling during operation and maintenance.*

The Future:

While CFTC is proud of its longstanding and continuing efforts to plan and operate in an energy-efficient way that minimizes environmental impact, we recognize that as technology changes and our mission evolves, there will be opportunities to do even more in the future. As data on “sustainable contracting” become more readily available for example, we will be alert to opportunities to take advantage of that information. With the very rapid pace of technology improvements in the IT arena, we expect we will continue to build on the very significant progress we have made last year with Night Watchman and this year with “Lights Out.”

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Size & Scope of Agency Operations

Table 1: Agency Size & Scope

Agency Size & Scope	FY 2011	FY 2012
Total Number of Employees as Reported in the President's Budget	699	703
Total Acres of Land Managed	0	0
Total Number of Buildings Owned	0	0
Total Number of Buildings Leased (GSA and Non-GSA Lease)	4	4
Total Buildings Gross Square Feet (GSF)	382,399	442,745
Operates in Number of Locations Throughout U.S.	4	4
Operates in Number of Locations Outside of U.S.	0	0
Total Number of Fleet Vehicles Owned	0	0
Total Number of Fleet Vehicles Leased	0	0
Total Number of Exempted-Fleet Vehicles (Tactical, Law Enforcement, Emergency, Etc.)	0	0
Total Amount Contracts Awarded as Reported in FPDS (\$Millions)	44	52

Goal 1: Greenhouse Gas (GHG) Reduction

Agency Progress toward Scope 1 & 2 GHG Goals

As a small agency housed exclusively in leased space and with only two vehicles, CFTC has no baseline data and therefore no mechanism for making a meaningful inventory of greenhouse gas emissions or comparing current scope 3 GHG emissions with earlier years. While these limitations prevent us from providing detailed quantitative analyses of our operations or proposing a meaningful scope 3 reduction target, CFTC supports the intent of the executive order and has been actively pursuing energy efficiency and environmentally responsible facilities and human resources management policies and practices for years. These are discussed in the following sections of this plan. ARRA investments will have no impact on CFTC operations and therefore are not relevant to the discussion of GHG reductions for this agency.

Figure 1-1

Table 1-1: Goal 1 Strategies - Scope 1 & 2 GHG Reductions

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Use the FEMP GHG emission report to identify/target high emission categories and implement specific actions to resolve high emission areas identified.	NA		
Ensure that all major renovations and new building designs are 30% more efficient than applicable code.	NA		
Implement in EISA 432 covered facilities all lifecycle cost effective ECMs identified.	NA		
Reduce on-site fossil-fuel consumption by installing more efficient boilers, generators, furnaces, etc. and/or use renewable fuels.	NA		
Reduce grid-supplied electricity consumption by improving/upgrading motors, boilers, HVAC, chillers, compressors, lighting, etc.	NA		
Employ operations and management best practices for energy consuming and emission generating equipment.	NA		
Install building utility meters and benchmark performance to track energy and continuously optimize performance.	NA		

Agency Progress towards Scope 3 GHG Goal

CFTC employees commute and some must travel between office locations as a routine part of conducting business. To reduce the need for travel, increase operational efficiency and provide a positive work environment, CFTC employs a number of programs, policies and strategies. These also tend to reduce energy consumption.

Figure 1-2

Table 1-2: Goal 1 Strategies - Scope 3 GHG Reductions

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Reduce employee business ground travel.	Yes	Encouraging telework, and the use of public transportation.	
Reduce employee business air travel.	Yes	All four of our CFTC offices use video-teleconferencing when possible.	
Develop and deploy employee commuter reduction plan.	NA		
Use employee commuting survey to identify opportunities and strategies for reducing commuter emissions.	Yes	81% of eligible staff participates in the transit program.	
Increase number of employees eligible for telework and/or the total number of days teleworked.	Yes	CFTC has a telework program and encourages employees to participate.	
Develop and implement bicycle commuter program.	Yes	CFTC has adopted the bike to work program.	
Provide bicycle commuting infrastructure.	Yes	We have several bike racks available to CFTC employees.	

Goal 2: Sustainable Buildings

Agency Progress toward Facility Energy Intensity Reduction Goal

While not strictly applicable in that CFTC is housed in leased facilities, we have developed effective relationships with our building managers in all locations, providing for the exchange of ideas and priorities. This has given us the opportunity to share our interest in energy efficiency and environmental stewardship in a way that results in positive change. For example, we have reviewed EO 13514 in great detail with the manager of our largest facility (DC). The manager has voluntarily developed an action plan to implement policies and procedures that comply with the intent of the order as much as reasonably possible. We also actively participate with the "Green Office" program at our New York location.

As stated earlier, the U.S. Environmental Protection Agency (EPA) just recently named the Beacon Capital Partners, an affiliate of the property owner of our Headquarters building, a 2012 ENERGY STAR Partner of the Year for strategically managing and improving the energy efficiency of its entire commercial office building portfolio. Through its partnership with the ENERGY STAR program, Beacon Capital has significantly reduced energy usage throughout its office building portfolio (including our Headquarters building), saved money for its tenants, and reduced greenhouse gas emissions.

Over the past few years, a number of energy efficiency upgrades and operational improvements have been made at the CFTC Headquarters location to reduce energy usage. As a result, our headquarters building achieved LEED certification overall, LEED Silver for two of our renovation projects and LEED Gold for another.

The CFTC is a small agency with offices in four locations, Washington, DC; New York, NY; Chicago, IL and Kansas City, MO. All are housed entirely within leased space. While being a tenant limits our ability to influence how the facilities themselves are operated, we have made a conscious effort over the years to consider the energy and environmental impacts of our lease and operational decisions. In fact, we have in the past year acquired new space in New York City. The extent to which the facilities manage building systems to minimize the consumption of energy, water and materials was included among the evaluation criteria. In the spirit of paragraph 2(f) of the EO regarding regional and local planning, we also included access to public transportation and pedestrian-friendly environment among the amenities considered in evaluating the site in NYC, as well as the site in Kansas City (our recently completed expansion project location).

Figure 2-1

Agency Progress toward Total Buildings Meeting the Guiding Principles

Since the CFTC is in a non-GSA leased space, we do not have a baseline or any way to specifically steer our leased space towards meeting these guiding principles for the building.

The management in concert with the CFTC follow robust guidelines for continuing towards the goal of managing a sustainable building. Our leased space has achieved a Silver LEED certification.

Additionally, the CFTC participates in a lights out programs, whereby we are committed to turn off all lights after the close of business each day.

This is achieved with the help of occupancy sensors (which automatically turns out the lights if no movement is detected over a short period of time).

The Chief Engineer conducts a periodic nighttime survey (after cleaning crew and security have departed), and investigates instances where lights have being left on (and helps the CFTC to identify the trouble areas that need attention).

Figure 2-2

Table 2: Goal 2 Strategies – Sustainable Buildings

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Incorporate green building specifications into all new construction and major renovation projects.	Yes	We earned LEED Certifications for our careful construction management on new renovation.	
Redesign or lease interior space to reduce energy use by daylighting, space optimization, sensors/control system installation, etc.	Yes	Occupancy sensors were installed in most offices.	Periodic night time survey to determine how many lights have been left on.
Deploy CEQ's Implementing Instructions - Sustainable Locations for Federal Facilities.	NA		
Include in every construction contract all applicable sustainable acquisition requirements for recycled, biobased, energy efficient, and environmentally preferable products.	NA		
Develop and deploy energy and sustainability training for all facility and energy managers.	Yes	Periodic communication is sent out in order to inform CFTC employees on programs (such as lights out and recycling) offered, and how to best maximize results.	

Goal 3: Fleet Management

Agency Progress toward Fleet Petroleum Use Reduction Goal

Not applicable. The CFTC leases only two vehicles and therefore has no significant vehicle fleet.

Figure 3-1

Agency Progress toward Fleet Alternative Fuel Consumption Goal

Not applicable. The CFTC leases only two vehicles and therefore has no significant vehicle fleet.

Figure 3-2

Table 3: Goal 3 Strategies – Fleet Management

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Optimize/Rightsize the composition of the fleet (e.g., reduce vehicle size, eliminate underutilized vehicles, acquire and locate vehicles to match local fuel infrastructure).	NA		
Reduce miles traveled (e.g., share vehicles, improve routing with telematics, eliminate trips, improve scheduling, use shuttles, etc.).	NA		
Acquire only highly fuel-efficient, low greenhouse gas-emitting vehicles and alternative fuel vehicles (AFVs).	NA		
Increase utilization of alternative fuel in dual-fuel vehicles.	NA		
Use a Fleet Management Information System to track fuel consumption throughout the year for agency-owned, GSA-leased, and commercially-leased vehicles.	NA		
Increase GSA leased vehicles and decrease agency-owned fleet vehicles, when cost effective.	NA		

Goal 4: Water Use Efficiency & Management

Agency Progress toward Potable Water Intensity Reduction Goal

Since the CFTC is exclusively in an office environment, water use is confined to normal domestic functions and is therefore very low on a per capita basis. Nevertheless, CFTC continues to pursue with our property managers sensible ways to minimize water usage without sacrificing essential services. Nearly all plumbing fixtures have

automatic, low-flow valves. Even small details like providing alcohol-based hand sanitizers are employed to reduce water consumption and waste paper.

Figure 4-1

Table 4: Goal 4 Strategies – Water Use Efficiency & Management

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Purchase and install water efficient technologies (e.g., Waterwise, low-flow water fixtures and aeration devices).	Yes	Installed low flow automatic valves in cooperation with the building management companies.	Since we are in leased space, there are no metrics for this information.
Develop and deploy operational controls for leak detection including a distribution system audit, leak detection, and repair programs.	NA		
Design, install, and maintain landscape to reduce water use.	NA		
Design and deploy water closed-loop, capture, recharge, and/or reclamation systems.	NA		
Install meters to measure and monitor industrial, landscaping, and agricultural water use.	NA		

Goal 5: Pollution Prevention & Waste Reduction

Agency Progress toward Pollution Prevention & Waste Reduction

Table 5: Goal 5 Strategies – Pollution Prevention & Waste Reduction

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Eliminate, reduce, or recover refrigerants and other fugitive emissions.	NA		
Reduce waste generation through elimination, source reduction, and recycling.	Yes	Office paper, metal and plastics are recycled and closely monitored by the building managers, thereby reducing flow to landfills.	
Implement integrated pest management and improved landscape management practices to reduce and eliminate the use of toxic and hazardous chemicals/materials.	NA		
Establish a tracking and reporting system for construction and demolition debris elimination.	Yes	This was carefully monitored during FY12 construction - we achieved LEED Certification in part because of our careful management of waste streams.	We achieved LEED Certification
Develop/revise Agency Chemicals Inventory Plans and identify and deploy chemical elimination, substitution, and/or management opportunities.	NA		

Goal 6: Sustainable Acquisition

Agency Progress toward Sustainable Acquisition Goal

CFTC's purchasing activity is conducted through the GSA schedule and NASA SEWP contracts, all of which contain contract clauses addressing mandated "sustainable" requirements.

Figure 6-1

Federal Procurement Data System Standard Reports on Biopreferred Procurement Actions

The CFTC didn't procure any biopreferred items during FY12.

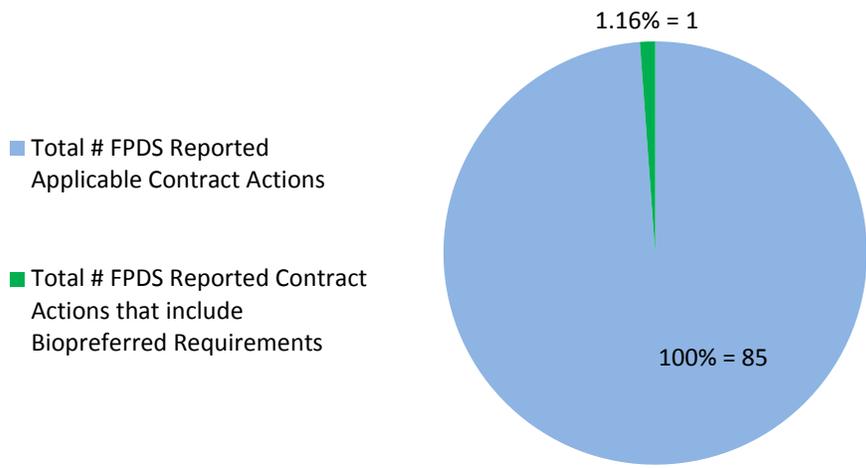


Table 6: Goal 6 Strategies – Sustainable Acquisition

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Update and deploy agency procurement policies and programs to ensure that federally-mandated designated sustainable products are included in all relevant procurements and services.	Yes	CFTC fastidiously complies with all applicable procurement regulations.	
Deploy corrective actions to address identified barriers to increasing sustainable procurements with special emphasis on biobased purchasing.	NA		
Include biobased and other FAR sustainability clauses in all applicable construction and other relevant service contracts.	NA		
Review and update agency specifications to include and encourage biobased and other designated green products to enable meeting sustainable acquisition goals.	NA		
Use Federal Strategic Sourcing Initiatives, such as Blanket Purchase Agreements (BPAs) for office products and imaging equipment, which include sustainable acquisition requirements.	NA		
Report on sustainability compliance in contractor performance reviews.	NA		

Goal 7: Electronic Stewardship & Data Centers

Agency Progress toward EPEAT, Power Management & End of Life Goals

The CFTC's main computing facility is categorized as a server room rather than a data center.

More than 95% of current CFTC equipment addressed by Electronic Product Environmental Assessment Tool (EPEAT) (workstations, displays, notebooks) meets EPEAT requirements.

* CFTC computers and monitors are configured for performance rather than power saving based on mission need to support telework and effective mobile computing.

* CFTC does not have policies that specifically address extending the useful life of electronic equipment.

CFTC uses GSA to dispose of electronic equipment.

CFTC complies with the following requirements of the Federal Electronics Challenge:

*CFTC does not comply with the following requirements of the Federal Electronics Challenge:

Based on categorizing our main computing facility as a server room rather than a data center as part of the Federal Data Center Consolidation Initiative, we have responded N/A to the data center questions.

Figure 7-1

Table 7: Goal 7 Strategies – Electronic Stewardship & Data Centers

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Identify agency "Core" and "Non-Core" Data Centers.	NA		
Consolidate 40% of agency Non-Core Data Centers.	NA		
Optimize agency Core Data Centers across total cost of ownership metrics.	NA		
Ensure that power management, duplex printing, and other energy efficiency or environmentally preferable options and features are enabled on all eligible electronics and monitor compliance.	Yes	CFTC only purchases Energy Star rated printing equipment. Printers default to duplex black and white printing.	
Update and deploy policies to use environmentally sound practices for disposition of all agency excess or surplus electronic products,	Yes	Our data technology branch closely manages disposition of excess electronic equipment.	

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
including use of certified eSteward and/or R2 electronic recyclers, and monitor compliance.			
Ensure acquisition of 95% EPEAT registered and 100% of ENERGY STAR qualified and FEMP designated electronic office products.	Yes	More than 95% of current CFTC equipment addressed by Electronic Product Environmental Assessment Tool (EPEAT) (workstations, displays, notebooks) meets EPEAT requirements.	

Goal 8: Renewable Energy

Agency Renewable Energy Percentage of Total Electricity Usage

The CFTC is in a leased facilities and has no access to energy usage data. However, we do purchase Renewable Energy Credits (REC) where we can. This is one of the elements that contributed to our agency gaining LEED Certification in several of our facilities.

Figure 8-1

Table 8: Goal 8 Strategies â€™ Renewable Energy

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Purchase renewable energy directly or through Renewable Energy Credits (RECs).	Yes	These are purchased for both our Kansas City and DC locations.	

(A) Will the agency implement the following strategies to achieve this goal?	(B) Top 5? Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Install onsite renewable energy on federal sites.	NA		
Lease land for renewable energy infrastructure.	NA		
Develop biomass capacity for energy generation.	NA		
Utilize performance contracting methodologies for implementing ECMs and increasing renewable energy.	NA		
Work with other agencies to create volume discount incentives for increased renewable energy purchases.	NA		

Goal 9: Climate Change Resilience

Agency Climate Change Resilience

The Commodity Futures Trading Commission (CFTC) is the independent federal agency that regulates commodity futures and options markets in the United States. More broadly, the CFTC assures the economic utility of the futures markets by encouraging their competitiveness and efficiency, protecting market participants against fraud, manipulation, and abusive trading practices, and by ensuring the financial integrity of related market processes. Ultimately, the CFTC's continued operational viability supports the effective regulation, monitoring and functional viability of U.S. financial markets.

The CFTC monitors markets and market participants closely through its headquarters in Washington, D.C. and field offices in Chicago, Kansas City, and New York, which are the major U.S. cities where commodity futures exchanges are located.

The CFTC recognizes climate change as a potential hazard to mission operations, staffing, facilities and IT support services. To ensure a comprehensive approach to understanding and mitigating the challenges posed by climate change, the CFTC has incorporated sustainability assurance through its Sustainability Officer and the Office of Logistics and Operations. The Chief of CFTC's Logistics and Operations Office serves as the agency's Senior Sustainability Officer. This officer has been identified as the agency's lead for developing, implementing and evaluating CFTC's sustainability and climate change adaptation planning and its integration across all business lines.

The CFTC's mission and programs are defined by Congress and its response to the changing needs associated with the regulations of commercial markets and market participants. The CFTC's strategic approach to climate change adaptation will focus on reaction and support of the effects to the various commodity markets due to climate change induced hazards, and the overall sustainability of the CFTC staff, facilities, mission, and support infrastructure.

The risks and vulnerability to CFTC's mission, facilities and infrastructure have been identified in the Business Impact Assessment (BIA)/Business Process Analysis (BPA) as part of its overall continuity program. All identified risks and vulnerabilities to each of CFTC's locations have been categorized and prioritized to ensure effective contingency planning in the following critical areas:

The CFTC's Office of Logistics and Operations is responsible for the following climate change adaptation planning:

The CFTC's programmatic approach to climate change sustainability will incorporate the following:

Table 9: Goal 9 Strategies – Climate Change Resilience

(A) Will the agency implement the following strategies to achieve this goal?	(B) Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Ensure climate change adaptation is integrated into both agency-wide and regional planning efforts, in coordination with other Federal agencies as well as state and local partners, Tribal governments, and private stakeholders.	Yes		
Update agency emergency response procedures and protocols to account for projected climate change, including extreme weather events.	Yes	Monitor and evaluate the implementation and success of climate change adaptation procedural activities (adjusting procedures and/or activities as new climate change information becomes available)	

(A) Will the agency implement the following strategies to achieve this goal?	(B) Yes/No/NA	(C) Strategy Narrative	(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months
Ensure workforce protocols and policies reflect projected human health and safety impacts of climate change.	Yes	Identify and prioritize actions to better understand risks and opportunities	
Update agency external programs and policies (including grants, loans, technical assistance, etc.) to incentivize planning for, and addressing the impacts of, climate change.	NA		
Ensure agency principals demonstrate commitment to adaptation efforts through internal communications and policies.	Yes	Distribute and provide awareness of the adaptation plan to CFTC staff	
Identify vulnerable communities that are served by agency mission and are potentially impacted by climate change and identify measures to address those vulnerabilities where possible.	NA		
Ensure that agency climate adaptation and resilience policies and programs reflect best available current climate change science, updated as necessary	Yes	CFTC organizational structure has in place a Sustainability Officer within the Office of Logistics and Operations, and a COOP office.	
Design and construct new or modify/manage existing agency facilities and/or infrastructure to account for the potential impacts of projected climate change.	NA		
Incorporate climate preparedness and resilience into planning and implementation guidelines for agency-implemented projects.	NA		

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Size & Scope of Agency Operations

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Table 1: Agency Size & Scope

Agency Size & Scope FY 2011 FY 2012 0 0

Goal 1: Greenhouse Gas (GHG) Reduction

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Agency Progress toward Scope 1 & 2 GHG Goals

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Figure 1-1

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Table 1-1: Goal 1 Strategies - Scope 1 & 2 GHG Reductions

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Agency Progress towards Scope 3 GHG Goal

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Figure 1-2

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Table 1-2: Goal 1 Strategies - Scope 3 GHG Reductions

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 2: Sustainable Buildings

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Agency Progress toward Facility Energy Intensity Reduction Goal

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Agency Progress toward Total Buildings Meeting the Guiding Principles

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Table 2: Goal 2 Strategies ‘ Sustainable Buildings

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

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Agency Progress toward Fleet Petroleum Use Reduction Goal

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Table 3: Goal 3 Strategies â€™ Fleet Management

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 4: Water Use Efficiency & Management

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Agency Progress toward Potable Water Intensity Reduction Goal

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Figure 4-1

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Table 4: Goal 4 Strategies â€™ Water Use Efficiency & Management

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 5: Pollution Prevention & Waste Reduction

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Agency Progress toward Pollution Prevention & Waste Reduction

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Table 5: Goal 5 Strategies â€™ Pollution Prevention & Waste Reduction

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 6: Sustainable Acquisition

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Agency Progress toward Sustainable Acquisition Goal

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Figure 6-2

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Table 6: Goal 6 Strategies â€™ Sustainable Acquisition

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

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Agency Progress toward EPEAT, Power Management & End of Life Goals

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Figure 7-1

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Table 7: Goal 7 Strategies â€™ Electronic Stewardship & Data Centers

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 8: Renewable Energy

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Agency Renewable Energy Percentage of Total Electricity Usage

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Figure 8-1

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Table 8: Goal 8 Strategies â€™ Renewable Energy

(A) Will the agency implement the following strategies to achieve this goal? (B) Top 5? Yes/No/NA (C) Strategy Narrative (D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0 0

Goal 9: Climate Change Resilience

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Agency Climate Change Resilience

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Table 9: Goal 9 Strategies â€™ Climate Change Resilience

(A) Will the agency implement the following strategies to achieve this goal? (B) Yes/No/NA (C) Strategy Narrative

(D) Specific targets/metrics to measure strategy success including milestones to be achieved in next 12 months 0

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