



2012 Strategic Sustainability Plan

CFTC 2012 Sustainability Plan

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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 continuation and 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 Kansas City, MO. In 2012, the CFTC will complete its final expansion project with the modification of our office in New York City. 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. This plan describes these efforts in more detail.

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 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 New York, as well as the site in Kansas City (our recently completed expansion project location).

- 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. This occurred as we modified our offices over the past year. For our recently completed projects in DC and Kansas City, we continued our established policy of seeking LEED certification, typically at the Silver level—Gold where technically feasible and economically justified. 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 have implemented the 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) 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, 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. They include the CFTC support of

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the “LEED Silver” certification achieved for the Lafayette Centre, participation in the Enernoc load reduction program, the CFTC and owner installation of occupancy sensors, energy management system enhancements of the building’s HVAC system, and “lights off” inspections in the evenings. 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.*

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- *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 this year with Night Watchman.

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Appendix A: CFTC Climate Change Adaptation Plan

Summary of Adaptation Strategy, Vulnerability Analysis and Priority Actions for FY 2013

Template Source:

Federal Agency Climate Change Adaptation Planning Ensuring a resilient, healthy, and prosperous Nation in the face of a changing climate: Support Document. Implementing Climate Change Adaptation Planning in Accordance with Executive Order 13514 “Federal Leadership in Environmental, Energy, and Economic Performance.” Interagency Climate Change Adaptation Agency Working Group Recommendations to the Council on Environmental Quality, January 21, 2011.

Background on the CFTC’s Mission and Operations

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.

1. Vision and Strategic Approach to Climate Change Adaptation

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

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commodity markets due to climate change induced hazards, and the overall sustainability of the CFTC staff, facilities, mission, and support infrastructure.

2. Climate Change Vulnerability Analysis: Risks and Opportunities

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:

- Assets
- Operations
- Health and Safety
- Infrastructure and Support System

- Economic Activity
- External Coordination

3. Process for Adaptation Planning and Evaluation

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

- Explore and identify climate change vulnerabilities
- Identify and prioritize actions to better understand risks and opportunities
- 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)
- Monitor and evaluate planning implementation
- Distribute and provide awareness of the adaptation plan to CFTC staff
- Review and update adaptation plan annually or as required

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4. Programmatic Activities for Adaptation Planning

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

- CFTC organizational structure has in place a Sustainability Officer within the Office of Logistics and Operations, and a COOP office. These offices will work in concert to ensure climate change is addressed in all of its contingency plans as part of CFTC's all hazards approach to long-term sustainability.
- The CFTC climate change adaptation plan and COOP plan will incorporate climate change as a component of its all hazards planning approach to emergency preparedness and sustainability.
- Collaboration and coordination with federal agency partners/stakeholders will occur in all of the CFTC climate change adaptation planning initiatives.

5. Improving Understanding of Climate Change Risks/Opportunities

In 2011 and 2012, the CFTC attended interagency climate change workshops sponsored by the Council on Environmental Quality to better understand and identify climate change vulnerabilities and risks. The lessons learned at these workshops provided information relevant to the potential impacts of climate change on CFTC operations and programs.

To ensure better understanding of evaluating climate change risks and opportunities, the CFTC will incorporate the following in its overall adaptation planning;

- Conduct periodic vulnerability assessments
- Provide periodic climate change education awareness updates to CFTC employees
- Participate in National Level Exercises
- Collaborate with federal agency partners

6. Actions to Address Climate Change Risks/Opportunities

The CFTC's adaptation planning program will be responsible for addressing risks and opportunities on an annual basis, or as required. The adaptation planning program will incorporate the following programmatic activities:

- Risk assessment
- HQs and Regional Office level planning
- Training

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- Program development, implementation, monitoring, evaluation and oversight
- Multi-year strategic program management planning

Action	Scale (National, Regional, Local)	Start Date	Collaborating Agencies (if applicable)
Conduct a risk assessment/analysis of CFTC vulnerability to climate change	HQs/Regional Offices	March 2013	NA
CFTC HQs Adaptation Plan	HQs Office	August 2013	NA
Regional Adaption Plan Annex	Regional Offices	January 2014	NA
Participate in inter-agency and executive branch efforts to coordinate adaptation plan efforts, as appropriate, and/or relevant training for key staff	National	Ongoing	SEC, FTC