

# The U.S. Office of Special Counsel Sustainability Plan, 6/2/10

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**I. Agency Policy Statement (see attached letter)**



**U.S. OFFICE OF SPECIAL COUNSEL**

1730 M Street, N.W., Suite 218  
Washington, D.C. 20036-4505  
202-254-3600

June 1, 2010

OSC is committed to compliance with all the environmental and energy statutes, regulations, and Executive Orders which pertain to our sustainability targets. OSC is a small federal agency, which rents its building space commercially. Our determination of goals which will help reduce our Greenhouse Gas emissions by 2020 is complicated by the fact that we share office space. The only financial factor under our control is our payment of Supplemental Charges for Electricity used by IT in their data center (a separate server computer room).

We intend to increase participation in several different areas:

**Telecommuting** (including a recurring survey), HR will be releasing the telecommuting survey to OSC employees prior to Our June 2, 2010 deadline. Our anticipated return date for the survey results is June 11, 2010.

Increase use of **recycled paper**.

IT has already paid for a **server consolidation** program, in which 3 chassis blade servers, which are the equivalent (for electrical use purposes, not for data storage) of 6 servers. So the 25 servers we currently have will be reduced to the equivalent of 6, a 76% reduction. IT estimated that the energy use for these 3 blade servers would be 30% less than currently used.

Instructions were sent out by IT to allow each individual the option of permanently defaulting their printing option to **automatically double-sided printing**. So far, a single individual has opted to voluntarily use this feature. Our **restrooms** are in the process of being **remodeled**, and they will now contain sensors for the water faucets, the lights, and (possibly) the toilets themselves. These sensors will save on both light use, and water use.

**Video teleconferencing** existed in 2008. We have seen an increased use of it. There is no way for us to statistically measure its use however. Once this plan is approved, we will send an email out to our employees encouraging them to continue to use video teleconferencing in place of travel costs. It was determined that the implementation of the plans described in this document would be carried out at **zero extra cost** to the agency.

Sincerely,

A handwritten signature in black ink that reads "Karl Kamman".

Karl Kamman  
Senior Sustainability Officer

## II. Sustainability and the Agency Mission

Our primary mission is to safeguard the merit system in federal employment by protecting covered employees and applicants from prohibited personnel practices, especially reprisal for whistleblowing. The agency also supports covered federal employees and applicants by providing a secure channel for disclosures by them of wrongdoing in government agencies; enforces and provides advice on Hatch Act restrictions on political activity by government employees; and enforces employment rights secured by USERRA for federal employees who serve and protect the country in the National Guard or Reserves. Meeting these sustainability goals will also reduce our overall expenditures, making it easier to achieve the mission and meet the needs of our clients.

## III. Greenhouse Gas Reduction Goals

We plan on both increasing use of recycled paper, telecommuting, web based teleconferencing, and the use of more advanced computer servers which consume less electrical power.

## IV. Plan Implementation

We held an initial meeting with both the chief of personnel, and the chief of IT. The target reductions that we calculated were conveyed to the chief of our unit, who approved of them in general. Once this plan is submitted, a general email will be disseminated to headquarters and the field offices relaying what actions we plan to take for implementation. Our Director of Finance also serves as our Senior Sustainability Officer. He not only reports directly to the Special Counsel, but also would handle any budget integration issues. Since our reductions are going to take place at zero extra cost, we will have no problem with budget integration. Our evaluation will consist of comparing data in relation to our baseline of 2008; the data will be maintained in an excel spreadsheet maintained by the Financial section of our agency.

**Table 1: Critical Planning Coordination<sup>2</sup>**

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
Budget	No	No	No	No	No	No	No	No	No	No
Data Center Consolidation Plan	No	No	No	No	No	No	No	No	No	No

## V. Evaluating Return on Investment – n/a

## **VI. Transparency**

Until further discussion is held with senior management, for the time being, this information will be disseminated via internal email and our internal intranet.

## Section 2: Performance Review & Annual Update *(Update and Submit Annually)*

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- I. **Summary of Accomplishments:**<sup>3</sup> This is the first year that we have done sustainability as an agency.
- II. **Goal Performance Review:**
  - 1 . **GOAL: Scope 1 & 2 Greenhouse Gas Reduction – n/a**
  - 2 . **GOAL: Scope 3 Greenhouse Gas Reduction\***
    - a. Federal employee travel – **n/a**
    - b. Contracted waste disposal – **this will require further research to determine if we are able to modify future contracts.**
    - c. Transmission and distribution losses from purchased energy – **Our acquisition of new servers for our data center should allow us to exceed our goal of 15% reduction in Supplementary Electrical usage.**
    - d. Other, as defined by Agency – **n/a**
    - e. Discuss any planned agency activity or policy implementation to improve data accuracy and overall data collection and analysis methods related to Scope 3 GHG emissions – **We will need to request periodic reports from the building manager concerning our Supplemental Electrical usage.**

**\*In the table below, since our 2020 goals will have already been met, we used zero as the value for all fiscal years following 2011.**

SCOPE 3 GHG TARGET	Units <sup>4</sup>	FY 11	FY 12	FY 13	FY 14	....	FY 20
Overall Agency Scope 3 Reduction Target (reduced from FY08 base year) <sup>5</sup>	7.3%	12.435	0	0	0	0	0
Sub-Target for Federal Employee Travel	7.3%	12.136	0	0	0	0....	0
Sub-Target for Contracted Waste Disposal	0%	0	0	0	0	0....	0
Sub-Target for Transmission and Distribution Losses from Purchased Energy	15%	.299	0	0	0	0....	0
Other, as defined by agency	0%	n/a	n/a	n/a	n/a	n/a	n/a

- 3 . **GOAL: Develop and Maintain Agency Comprehensive Greenhouse Gas Inventory**  
– OSC plans on keeping an inventory of our statistics concerning telecommuting, and supplementary electrical usage,
- 4 . **GOAL: High-Performance Sustainable Design / Green Buildings<sup>6</sup> - n/a**
- 5 . **GOAL: Regional and Local Planning<sup>7</sup> - n/a**

6 . **GOAL: Water Use Efficiency and Management<sup>8</sup> - n/a**

7 . **GOAL: Pollution Prevention and Waste Elimination<sup>9</sup>**

- a. Increase source reduction of pollutants and waste – n/a
- b. Divert at least 50% non-hazardous solid waste by FY 2015, excluding construction and demolition (C&D) debris – **we will need to research this subgoal.**
- c. Divert at least 50% C&D materials and debris by FY 2015 - **we will need to research this subgoal.**
- d. Reduce printing paper use – **we have already implemented a voluntary program of using double sided printing.**
- e. Increase use of uncoated printing and writing paper containing at least 30% postconsumer fiber – **we will need to research this subgoal.**
- f. Reduce and minimize the acquisition, use, and disposal of hazardous chemicals and materials - **we will need to research this subgoal.**
- g. Increase diversion of compostable and organic materials from the waste stream - **we will need to research this subgoal.**
- h. Implement integrated pest management and landscape management practices to reduce and eliminate the use of toxic and hazardous chemicals and materials - n/a
- i. Increase agency use of acceptable alternative chemicals and processes – n/a
- j. Decrease agency use of chemicals to assist agency in achieving FY 2020 GHG reduction targets [See Section II - 1 and 2 above] – n/a
- k. Report in accordance with Sections (301-313) of the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986<sup>10</sup> - **we will need to research this subgoal.**



**8 . GOAL: Sustainable Acquisition<sup>11</sup>**

- l. Ensure 95% of new contract actions, including task and delivery orders under new contracts and existing contracts, require the supply or use of products and services that are energy efficient (Energy Star or FEMP-designated), water efficient, biobased, environmentally preferable<sup>12</sup> (excluding EPEAT-registered products), non-ozone depleting, contain recycled content, or are non-toxic or less toxic alternatives.<sup>13</sup> - **we will need to research this subgoal.**
  
- m. Update agency affirmative procurement plans (also known as green purchasing plans or environmentally preferable purchasing plans), policies and programs to ensure that all Federally-mandated designated products and services are included in all relevant acquisitions.<sup>14</sup> - **we will need to research this subgoal.**

**9 . GOAL: Electronic Stewardship<sup>15</sup> and Data Centers<sup>16</sup> - this entire set of subgoals will need to wait until IT can research an adequate response.**

- a. Establish and implement policy and guidance to ensure use of power management, duplex printing, and other energy efficient or environmentally preferred options and features on all eligible agency electronic products.
- b. Update agency policy to reflect environmentally sound practices for disposition of all agency excess or surplus electronic products.
- c. Update agency policy to ensure implementation of best management practices for energy efficient management of servers and Federal data centers
- d. Goals should identify how the agency intends to meet technology energy consumption reduction goals in its data centers.
- e. Discuss how the agency is planning on meeting the technology energy reduction goals in data centers. Include details on the investment plan, covered vs. non-covered facilities, and how the agency identified the covered facilities.
- f. Discuss how the agency will increase the quantity of electronic assets disposed through sound disposition practices. Include in the discussion how your agency is using or plans to use programs such as disposal through GSA Xcess, recycling through Unicor, donation through GSA's Computer for Learning (CFL) or other non-profit organizations, and/or recycling through a private recycler certified under the Responsible Recyclers (R2) guidance or equivalent.

**1 0 . GOAL: Agency Innovation – n/a**

### Section 3: Agency Self Evaluation

Note: OMB and CEQ will update these questions annually to reflect Administration priorities. For 2010, please respond to the following items. Each agency's total response for this section should be limited to one or two pages.

- I. Please answer 'yes' or 'no' to the following questions. If the answer is 'no', provide an explanation below.

Does your plan provide/consider overarching strategies and approaches for achieving long-term sustainability goals?	yes
Does your plan identify milestones and resources needed for implementation?	yes
Does your plan align with your agency's 2011 budget submission?	n/a
Is your plan consistent with your agency's FY 2011 budget and appropriately aligned to reflect your agency's planned FY 2012 budget submission?	yes
Does your plan integrate existing EO and statutory requirements into a single framework and align with other existing mission and management related goals to make the best use of available resources?	yes
Does your plan provide methods for obtaining data needed to measure progress, evaluate results, and improve performance?	yes

Narrative requested:

- II. We already have a plan in place to acquire new servers which will significantly reduce our supplemental electrical usage. Our use of double sided printing as a na option has already increased. Our telecommuting survey went out today, we are planning to increase telecommuting soon. None of these activities will cause us to spend additional funding.

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<sup>1</sup> Section 1 should be submitted in FY 2010 and represents an overall sustainability policy and implementation plan. In future years, agencies need only submit changes to the plan.

<sup>2</sup> Agencies should remove plans/reports that they currently are not required to complete and add any additional relevant plans/reports not currently included in the table.

<sup>3</sup> In the FY 2010 submission, agencies are encouraged to discuss planning efforts from current and previous years in order to identify progress associated with ongoing programs. In FY 2011, agencies should discuss FY 2010 accomplishments. Agencies should follow this pattern for future year submissions.

<sup>4</sup> GHG emissions are measured in mtCO<sub>2</sub>e and the percentage reductions are reductions in mtCO<sub>2</sub>e.

<sup>5</sup> Refer to the OFEE Scope 3 GHG Emissions Reduction Target Tool and User's Manual for detailed descriptions of each scope 3 categories and calculation methods. When writing narrative for this goal area, please note that it is not necessary to provide a great deal of detail. Agencies should focus on general strategy for reducing Scope 3 emissions and should plan to provide greater detail on milestones and actions taken to reduce emissions associated with agency-specific targets in subsequent updates to this plan.

<sup>6</sup> Agencies should reference existing Sustainable Building Implementation Plans. Plans do not need to be reproduced within this document. Incorporate by reference and indicate whether or not existing agency plans have been or will be updated to reflect EO13514.

<sup>7</sup> Discuss significant actions and efforts that the agency plans to undertake regarding participation in local and regional energy, transportation, watershed, and/or ecosystem planning and how this benefits the agency in terms of overall return on investment (economic, social, environmental, and mission related costs and benefits). Specifically address how the agency will align policy and planning processes to increase effectiveness and overall return on investment during implementation. If applicable, discuss any impacts on the agency's ability to achieve this goal in relation to the "Recommendations for Sustainable Locations for Federal Facilities," referenced in Section 10 of EO 13514 and "Recommendations for Federal Local Transportation Logistics," referenced in Section 11 of EO 13514.

<sup>8</sup> Agencies should reference existing Water Conservation plans and policies. Plans do not need to be reproduced within this document. Incorporate by reference and indicate whether or not existing agency plans have been updated to reflect EO 13514. Identify and discuss any new/revised agency policy and guidance necessary to implement Section 438 of the EISA 2007 (42 U.S.C. 17094).

<sup>9</sup> Agencies should reference existing Chemical Reduction and Pollution Prevention plans and policies. Plans do not need to be reproduced within this document. Incorporate by reference and indicate whether or not existing agency plans have been updated to reflect EO 13514. Discuss the agency's current trend in EPCRA and Toxic Release Inventory (TRI) reporting, and any anticipated changes in reported quantities based on meeting the agency's pollution prevention and waste minimization goal.

<sup>10</sup> 42 U.S.C. 11001 et seq

<sup>11</sup> Agencies should reference existing Green Purchasing, Green Procurement or Sustainable Procurement plans and policies. Plans do not need to be reproduced within this document. Incorporate by reference and indicate whether or not existing agency plans have been updated to reflect EO 13514. The discussion should include any necessary revisions to the agency's

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green purchasing plan and policies; methods for informing vendors and contractors about green purchasing requirements; training for contracting officials, purchase card holders, and product specifiers; annual compliance monitoring and corrective action; planned product testing or pilot procurements; and the development of tools and resources for product specifiers and contracting officials.

<sup>12</sup> EPEAT products are addressed in Goal 9: Electronic Stewardship and Data Centers.

<sup>13</sup> Purchases are mandated where such products and services meet agency performance requirements. These mandates do not apply to the acquisition of weapons systems. Agencies should discuss how they currently capture and analyze data to track their performance regarding the 95% target for new contracted actions. Where agencies are unable to track specific actions, they should discuss plans to improve data collection and identify areas where specific challenges exist.

<sup>14</sup> Some agencies may use the term 'green purchasing plan', 'affirmative procurement plan', and/or 'EPP'.

<sup>15</sup> Agencies should reference existing Electronic Stewardship, Green IT, etc plans and policies. Plans do not need to be reproduced within this document. Incorporate by reference and indicate whether or not existing agency plans have been updated to reflect EO 13514.

<sup>16</sup> Discuss agency strategy for data center consolidation and how the agency plans to address reducing energy intensity associated with data centers. For more information, agencies should consult their Chief Information Officer (CIO) and/or the OMB Data Center Consolidation Plan Guidance.