

**Advisory Council on Historic Preservation
Strategic Sustainability Performance Plan
21 June 2010**

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Preserving America's Heritage

Recommendations for HUD FY 2011 Research Agenda

The ACHP submitted the following two suggestions to the Department of Housing and Urban Development in response to that agency's call for recommendations on its FY 2011 research agenda. Both address historic preservation and sustainable communities.

Job Creation and Historic Preservation: Rehabilitation of historic buildings in urban and rural centers promotes community livability, helping to maintain attractive and environmentally sustainable communities. Historic preservation also creates jobs and catalyzes economic development, which is essential for long-term community vitality. HUD should undertake research to quantify job creation and other short-term employment as a result of HUD-assisted preservation projects (including CDBG) and examine how associated economic development is meeting the needs of communities while enhancing local character. HUD may wish to focus this research on a sample of communities that have been designated Preserve America Communities under the federal Preserve America program, in which HUD is a partner. There are currently over 800 Preserve America communities nationwide.

Energy Efficiency and Historic Affordable Housing: Rehabilitating historic buildings for affordable housing is an important strategy in creating and maintaining sustainable communities. Such buildings are often location efficient – near employment centers and transportation infrastructure – however, they frequently need retrofitting to be energy efficient. HUD should research how historic buildings can be rehabilitated to serve as affordable housing while both improving their energy efficiency and preserving their historic character. As part of the research, case examples of successful affordable housing projects that adaptively use historic buildings should be identified and made available.



Preserving America's Heritage

August 12, 2010

Mr. Cyrus Nasser
U. S. Department of Energy
Federal Energy Management Program,
Mailstop EE-2L
1000 Independence Avenue, SW
Washington, DC 20585-0121

RE: Department of Energy, 10 CFR Parts 433 and 435, Docket No. EE-RM/STD-02-112, RIN 1904-AC13, Comments from the Advisory Council on Historic Preservation on proposed rulemaking

Dear Mr. Nasser:

The Advisory Council on Historic Preservation (ACHP), established in 1966 by the National Historic Preservation Act (NHPA), is an independent federal agency that promotes the preservation, enhancement, and productive use of our nation's historic resources, and advises the President and Congress on national historic preservation policy. In accordance with the NHPA, the ACHP administers the "Section 106" process, pursuant to the implementing regulations "Protection of Historic Properties" (36 C.F.R. Part 800), which applies to projects, activities, or programs funded in whole or in part by a federal agency or requiring a federal permit, license, or approval. The statutory duties of the ACHP include reviewing the policies and programs of federal agencies and recommending to such agencies methods to improve the effectiveness, coordination, and consistency of those policies and programs with the programs carried out under the NHPA. In accordance with the mission and responsibilities of the ACHP, we are submitting comments on the Department of Energy's (DOE) proposed new rulemaking on "Energy Efficiency and Sustainable Design Standards for New Federal Buildings."

In reviewing the proposed rulemaking, there does not appear to be any direct conflicts with the NHPA, but there are opportunities for federal historic preservation and sustainability goals to be met together. ACHP suggests the following revisions:

- **Sections 433.2 and 435.2 Definition: Major Renovation:** The definition of "Major renovation" should be expanded to specifically include recognition that a "Major renovation" to improve energy efficiency has the potential to adversely affect character-defining features of historic buildings. While retaining the existing proposed definition for "Major renovation", the expanded definition should state that major renovations to historic buildings should follow the Secretary of the Interior's Standards for Rehabilitation in order to avoid such potential adverse effects.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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- **Sections 433.6(e)(1) and 435.6(3)(1) Integrated Design:** The definition of “Integrated design” should be expanded to provide consideration of context sensitivity and compatible design for new construction occurring in historic districts.
- **Sections 433.6(f)(9) and 435.6(f)(8) Materials:** The definition of “Materials” should be expanded to state a preference for retained or reused materials in renovation projects, especially materials that contribute to the historic integrity and character-defining features of historic buildings. The definition should also encourage consideration of on-site salvage and reuse of materials in the construction of a new building replacing an existing one.

In August of 2009, the ACHP worked with the General Services Administration(GSA) to develop a Program Comment under the ACHP’s regulations (36 CFR 800.14(e)) on “Select Envelope and Infrastructure Repairs and Upgrades to Historic Buildings” that addressed energy efficiency issues involving window replacements, lighting, roofing, and HVAC upgrades (see attached). We encourage DOE to review this Program Comment as background information that may be helpful in further refining its rules to ensure that both federal sustainability and historic preservation goals are met.

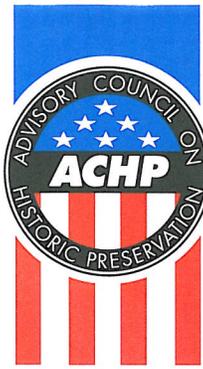
The ACHP appreciates the opportunity to comment on this proposed rulemaking by DOE. Our comments provided here do not relieve Federal agencies of their duty to comply with Section 106 of the NHPA before carrying out new construction or major renovations. The ACHP will continue to work with our federal partners to assist in their efforts to manage historic properties.

Sincerely,



John M. Fowler
Executive Director

Attachment



Preserving America's Heritage

The following comments are offered in response to the Department of Housing and Urban Development's Advance Notice and Request for Comment on the Sustainable Communities Planning Grant Program [Docket No. FR-5396-N-01].

The Advisory Council on Historic Preservation (ACHP) is the independent federal agency charged with advising the President and Congress on preservation of our nation's historic properties. The ACHP also administers the Preserve America Communities program on behalf of the White House and a consortium of federal agencies that includes HUD.

The ACHP has a keen interest in the goal of sustainable community development and knows first hand the important role that historic preservation can play in advancing that objective. The preservation and reuse of historic properties revitalizes communities, helping to maintain unique community character in ways that promote livability, support economic re-investment, and promote heritage tourism. HUD, through its Community Development Block Grant Program, already supports numerous preservation projects and encourages the kind of holistic community revitalization that is an integral part of sustainable and livable communities.

States, many communities, and many regional planning entities already have historic preservation plans or, at least, historic preservation components in their comprehensive or master plans. The Sustainable Communities Planning Grant Program offers an excellent opportunity to further promote the preservation as well as continuing productive use of historic properties as an integral component of regional plans for sustainable development. We recommend that HUD consider this in its decision making on all aspects of the program. We also have highlighted several specific opportunities below, in response to several of the questions posed in the Request for Comment.

We also would like to stress the potential opportunity for this grant program to support the work of National and State Heritage Areas. There presently are 49 Congressionally designated National Heritage Areas, regions where natural, cultural, historic, and scenic resources combine to form nationally important landscapes. A number of states also have created State Heritage Areas. Both National and State Heritage Areas generally are managed by multi-sector partner organizations that oversee planning for the region's historic properties and heritage assets. In the case of National Heritage Areas, they are required to develop general management plans that are approved by the Secretary of the Interior, and they are on the cutting edge of planning regional revitalization and sustainability through historic preservation and heritage tourism. We urge HUD to structure the Sustainable Communities Planning Grant Program so that Heritage Areas can participate and benefit from the program.

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Specific Comments on Several Questions Raised in the Request for Comment

Proposed Funding Categories and Eligible Activities

Category 1: Regional Plans for Sustainable Development

- Regional plans should include a region-wide vision and goals for utilizing historic properties to promote community revitalization and sustainable development through rehabilitation and reuse of historic buildings, as well as promotion of heritage tourism.
- The planning process should include stakeholders from the region's historic preservation community, such as State Historic Preservation Officers, Tribal Historic Preservation Officers, Preserve America Communities, local historic preservation commissions, National or State Heritage Areas, etc.

Category 2: Detailed Execution Plans and Programs

- Activities eligible for funding should include historic preservation plans and programs, portions of the long-term management plans for National or State Heritage Areas, and heritage tourism strategies and plans.
- In evaluating whether a previously adopted regional vision is consistent with the HUD/DOT/EPA Livability Principles, HUD should consider how that vision:
 - promotes the preservation and reuse of historic properties in revitalizing communities and safeguarding rural landscapes (in accordance with Livability Principle 4: Support Existing Communities); and
 - recognizes the importance of preserving historic properties when enhancing the unique characteristics of communities and investing in neighborhoods (in accordance with Livability Principle #6: Value Communities and Neighborhoods).

Entities Eligible for Funding

- HUD should consider defining eligible entities to include those which are approved by the Secretary of the Interior or the Governor of a state to develop and implement National and State Heritage Area management plans, respectively.

March 11, 2010

John L. Nau, III
Chairman

Susan S. Barnes
Vice Chairman

John M. Fowler
Executive Director



Preserving America's Heritage

May 14, 2010

Mr. Tim Frost
Senior Vice President
International Code Council
4051 West Flossmoor Road
Country Club Hills, IL 60478-5795

Ms. Dynice Broadnax
International Code Council
4051 West Flossmoor Road
Country Club Hills, IL 60478-5795

RE: Comments on the draft *International Green Construction Code, Public Version 1.0*

Dear Mr. Frost and Ms. Broadnax:

The Advisory Council on Historic Preservation (ACHP), established in 1966 by the National Historic Preservation Act (NHPA), is an independent federal agency that promotes the preservation, enhancement, and productive use of our nation's historic resources, and advises the President and Congress on national historic preservation policy. In accordance with the NHPA, the ACHP administers the "Section 106 Process," pursuant to the implementing regulations "Protection of Historic Properties (36 C.F.R. Part 800)," which applies to projects, activities, or programs funded in whole or in part by a federal agency or requiring a federal permit, license, or approval.

As part of the administration of the Section 106 process, the ACHP regularly consults with U.S. land managing agencies, including the General Services Administration (GSA), the Department of Agriculture (DOA), the Department of the Interior (DOI), and the Department of Defense (DOD), as well as assistance agencies including the Department of Housing and Urban Development (HUD), the Department of Commerce (DOC), the Federal Emergency Management Agency (FEMA), and the Department of Energy (DOE), all of which are involved in building construction. These agencies and associated private property owners, developers, contractors, and local code officials, therefore, will apply the IGCC to new construction and rehabilitation projects which may involve historic buildings. Given the ACHP's role in administering Section 106 and consulting with diverse stakeholders, we are submitting comments on the International Code Council's (ICC) draft *International Green Construction Code (IGCC)*, Public Version 1.0, March 2010.

The ACHP recommends that the ICC comprehensively address historic buildings and sustainability in the IGCC in order that it can be relevant and user friendly to all involved in building construction or

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rehabilitation. Based on our review of the list of IGCC work group members and public meeting attendees, which included the EPA and the GSA, it appears that other key federal agencies and preservation organizations did not participate in the ICC's IGCC drafting effort. As a result, the IGCC focuses largely on new construction. We note that historic buildings are exempted from the IGCC in cases where: "implementation would change the visible configuration of the building components in a manner that is not in keeping with the buildings historic nature, as determined by the code official; and, compliance would produce a conflict with a building function that is fundamental to the historic nature of the building" (Section 1005). Nevertheless, the likelihood of historic properties being directly or indirectly affected is not sufficiently addressed.

Considering the environmental advantages associated with the reuse and recycling of original historic building components, and considering their embodied energy, the ACHP is optimistic that many historic building projects could comply with the standards set forth in the IGCC. The ACHP recently formed a Sustainability Task Force and is reviewing this matter, especially with regard to our publication, *Assessing the Energy Conservation Benefits of Historic Preservation: Methods and Examples* (1979). We believe that our efforts should be informed by the IGCC draft code initiative.

To respect the ICC's public comment deadline, the ACHP has attached an integrated set of revisions for your consideration. All of the ACHP's suggested revisions will help future users of the IGCC to apply the IGCC to historic buildings.

- Chapter 1: Administration, Section 103: Duties and Powers of the Code Official: Suggested additional language with regard to historic buildings, so as to allow the code official to engage expert opinion as necessary to comply with the *National Park Service Secretary of the Interior Standards for the Treatment of Historic Properties*, and especially the *Professional Qualifications Standards* therein.
- Chapter 5: Material Resource Conservation and Efficiency, Section 507: Project Electives: Suggested additional language with regard to historic buildings and existing buildings, which are near the threshold of meeting the definition of historic buildings as determined by the code official, so as to allow reuse of at least 50 percent of original building components as determined by the code official, to be considered as a material selection project elective. (For consistency, this elective should be added to Table 303.1, "Project Electives".)
- Various Chapters: Suggested additional language with regard to historic buildings and historic building sites, to promote a comprehensive and integrated approach within the IGCC to historic buildings and sites.

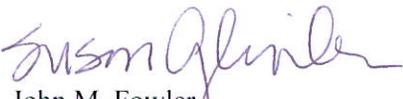
Since the ACHP has not participated substantively in the ICC's drafting process thus far, we look forward to contributing to additional discussions to improve the IGCC's treatment of historic buildings. In addition, the ACHP suggests that the ICC consult with the National Trust for Historic Preservation (NTHP), the National Conference of State Historic Preservation Officers (NCSHPO), the Association for Preservation Technology (APT), and the American Institute of Architects Historic Resources Committee, for their technical expertise.

Current economic conditions have laid plain the importance of federal involvement in economic development and community revitalization. As funds for the American Reinvestment and Recovery Act (ARRA) are obligated, Community Development Block Grants (CDBG) are authorized, and federal

historic tax credit projects are certified (Internal Revenue Code Section 47), responsible and productive use of our nation's historic buildings has become critical. Further, historic building projects have often become touchstones for preservation-sensitive and sustainable innovation. To enable an even-handed and logical application of the IGCC by our Federal and local agencies and the private sector who are in partnership with them, the ACHP encourages the ICC to take a holistic approach to new construction and historic building projects.

We look forward to participating in additional discussions with the ICC on these important matters prior to IGCC finalization this November. A member of my staff will reach out to you shortly to arrange a meeting. Please also feel free to contact me at your convenience by phone, (202-606-8512) or e-mail (jfowler@achp.gov). Thank you for your consideration of our comments.

Sincerely,

For

John M. Fowler
Executive Director

Enclosures

Section 1: Agency Policy and Strategy

I. Agency Policy Statement

The Advisory Council on Historic Preservation (ACHP) is fully committed to compliance with federal environmental and energy statutes, regulations, and Executive Orders in its daily operations. The ACHP will take steps to reduce its consumption of non-renewable energy and reduce greenhouse gas emissions resulting from its annual operations. ACHP management and staff will seek creative ways to achieve sustainability targets in such areas as green purchasing, reduction in travel, use of public transit, flexible work schedules, and telework.

Also, consistent with its mission, the ACHP will promote the preservation of historic properties as a sustainability strategy and will assist federal agencies in complying with federal historic preservation laws, regulations, and policies as they work toward achieving their sustainability goals. Toward those ends, the ACHP has created a Task Force on Sustainability and Historic Preservation, which is addressing issues of energy efficiency and community livability. The task force provides a vehicle to help assist agencies in fully integrating historic preservation into their policies and programs addressing sustainability.

II. Sustainability and the Agency Mission

The mission of the ACHP is to promote the preservation, enhancement, and productive use of our nation's historic resources, and advise the President and Congress on national historic preservation policy. Established in 1966 by the National Historic Preservation Act, the ACHP serves as the primary federal policy advisor to the President and Congress; recommends administrative and legislative improvements for protecting our nation's heritage; advocates full consideration of historic values in federal decision making; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies.

The ACHP is one of three tenants in a federally owned, GSA-managed building, has only 36 full-time equivalent employees, and has no fleet of vehicles at its disposal. Therefore, the ACHP has very limited opportunities to address sustainability targets and goals in carrying out its daily operations. Nevertheless, ACHP management and staff will seek creative ways to achieve sustainability targets in such areas as green purchasing, reduction in travel, use of public transit, flexible work schedules, and telework, as well as in supporting GSA's efforts in the building. In addition, because of its unique mission and structure, the ACHP can play a role in helping other federal agencies enhance their sustainability efforts. As an independent agency, the ACHP brings together through its membership federal agency heads, representatives of state and local governments, historic preservation leaders and experts, a member of an Indian tribe or Native Hawaiian organization, and private citizens to shape national policies and programs dealing with historic preservation. The diverse membership is reflected in its efforts to seek sensible, cost-effective ways to mesh preservation goals with other public needs, including promotion of sustainable practices.

Preservation of historic properties plays an important role in sustainable design and development, and the ACHP can assist agencies to recognize and tap this potential. The ACHP has created a Task Force on Sustainability and Historic Preservation, which is addressing issues of energy efficiency and community livability. Federal agency members of the task force include the Departments of Energy, Transportation, and Housing and Urban Development, as well as the Environmental Protection Agency. The task force will advocate directly with ACHP

member agencies to promote key issues and outcomes and also serve as a facilitator to assist non-federal parties in coordinating with federal agencies. The task force provides a vehicle for developing guidance to assist agencies in fully integrating historic preservation into their policies and programs addressing sustainability.

III. Greenhouse Gas Reduction Goals

As a tenant in a federally owned, GSA-managed building, the ACHP is unable to identify GHG scope 1, 2, and 3 emissions except for those generated by employee business travel and commuting. Our capacity to affect greenhouse gas emissions generated by utility consumption is limited to supporting building management efforts, but we will pursue cooperation with these efforts down to the individual employee level. We will work with GSA to raise the consciousness of each employee regarding their ability to contribute to the goals of this effort.

Fully 93% of ACHP employees participate in the federal transit benefits program, as well as having access to nearby bicycle commuter facilities managed by EPA. The ACHP limits its business travel to that required to support mission objectives. The ACHP will closely monitor requests for travel authorizations to ensure only mission-critical travel is undertaken and that alternatives to travel are implemented whenever doing so will not undermine the agency's mission.

IV. Plan Implementation

The Director, Office of Administration, will manage the development, implementation, and update of the SSPP. Staff coordination and communication requirements are minimal and will be addressed through face-to-face meetings, agency-wide broadcast e-mail, or management memoranda. Integration with annual budget formulation is not required, as implementation will not require additional funding. Achievement of identified goals will be measured through annual review of commuter/official travel and sustainability characteristics of applicable acquisitions. Leadership in coordinating with other federal agencies to promote integration of historic preservation in their agency sustainability initiatives will come from the ACHP Task Force on Sustainability and Historic Preservation.

Table 1: Critical Planning Coordination

Originating Report / Plan	Scope 1 & 2 GHG Reduction	Scope 3 GHG Reduction	Develop and Maintain Agency Comprehensive GHG Inventory	High-Performance Sustainable Design / Green Buildings	Regional and Local Planning	Water Use Efficiency and Management	Pollution Prevention and Waste Elimination	Sustainable Acquisition	Electronic Stewardship and Data Centers	Agency Specific Innovation
GPRA Strategic Plan	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Agency Capital Plan	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
A-11 300s	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Annual Energy Data Report	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EISA Section 432 Facility Evaluations/Project Reporting	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Budget	N/A									
Asset Management Plan / 3 Year Timeline	N/A									
Circular A-11 Exhibit 53s	N/A									
OMB Scorecards	N/A									
DOE's Annual Federal Fleet Report to Congress and the President	N/A									
Data Center Consolidation Plan	N/A									
Environmental Management System	N/A									
Other (reports, policies, plans, etc.)	N/A									

V. Evaluating Return on Investment

As outlined in Item III, above, the ACHP has not identified specific projects and therefore cannot conduct cost-benefit or ROI analyses.

VI. Transparency

The ACHP will publish this report on its Web site and distribute to staff and council members. Periodic updates throughout the review period will provide stakeholders with additional information about how the ACHP will make the information public.

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

I. Summary of Accomplishments:

As a small agency tenanted with other agencies in a GSA-owned and operated building, the ACHP does not have the ability to respond to most of the quantitative targets identified below. However, the ACHP has pursued all other aspects of this order within the scope of its authority.

The ACHP fully supports the GSA building management's efforts to ensure the Old Post Office (OPO) building is operated on an environmentally sound basis. We participate in monthly meetings with GSA and other building tenants during which ideas for improving building operations are vetted and presented to GSA for adoption

For instance, all potable water sources in the building utilize water-saving devices. The goal of water conservation is also supported by the prompt reporting of any plumbing problems to GSA. The building's hallway lighting was recently converted from an incandescent to a fluorescent system with very little loss of illumination.

All tenants in the OPO participate in a recycling program which accepts all types of paper, plastics, and cans. This program is robust, and the proceeds are used to support tenant participation in Small Agency Council activities.

The ACHP is well integrated with our local and regional planning infrastructure. The ACHP is housed in a historic building in the central business district. Fully 93% of ACHP employees are currently enrolled in the federal transit benefit program. This strong rate of participation is the result of being located across the street from a subway system stop, and on multiple city bus routes. A number of employees walk or cycle to work daily.

The ACHP currently promotes electronic stewardship by purchasing qualifying Energy Star products, donating used computers to qualifying organizations, and disposing of equipment using environmentally sound practices. We will continue to pursue best practices in implementing an environmentally sound electronics life-cycle management program.

II. Goal Performance Review

1. GOAL: Scope 1 & 2 Greenhouse Gas Reduction

	SCOPE 1&2 GHG TARGET	Unit	FY 10	FY 11	FY 12	FY 13	FY 14	FY 15	FY 16	FY 20
Buildings	Energy Intensity Reduction Goals (BTU/SF reduced from FY03 base year)	%	15%	18%	21%	24%	27%	30%	hold	hold
	Planned Energy Intensity Reduction (BTU/SF reduced from FY03 base year)	%	N/A								
	Renewable Electricity Goals (Percent of electricity from renewable sources)	%	5%	5%	5%	7.5%	hold	hold	hold	hold	hold
	Planned Renewable Electricity Use (Percent of electricity from renewable sources)	%	N/A								
Fleet	Petroleum Use Reduction Targets (Percent reduction from FY05 base year)	%	10%	12%	14%	16%	18%	20%	22%	30%
	Planned Petroleum Use Reduction (Percent reduction from FY05 base year)	%	N/A								
	Alternative Fuel Use in Fleet AFV Target (Percent increase from FY05 base year)	%	61%	77%	95%	114%	136%	159%	hold	hold
	Planned Alternative Fuel Use in Fleet AFV (Percent increase from FY05 base year)	%	N/A								
Other	Other, as defined by agency	?	N/A								
	Scope 1 & 2 - Reduction Target (reduced from FY08 base year)	%	N/A								
	Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A						
	Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A						
	Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A						

- a. Buildings
 - 1) Reduce Facility Energy Intensity
 - 2) Renewable Electricity Installation & Use
- b. Fleet
 - 1) Reduce Petroleum Use in Fleet Vehicles
 - 2) Increase Use of Alternative Fuels in Fleet AFVs
 - 3) Optimize Use of Vehicles and Right-Size Fleet
 - 4) Increase Use of Low Emission and High Fuel Economy Vehicles
- c. Other, as defined by agency

The ACHP has no vehicle fleet and is one of several agencies tenanted in a GSA-owned and operated building, The ACHP has no ability to manage or report on Scope 1 & 2 greenhouse gas emissions.

2. GOAL: Scope 3 Greenhouse Gas Reduction

SCOPE 3 GHG TARGET	Units	FY 10	FY 11	FY 12	FY 13	FY 14	FY 20
Overall Agency Scope 3 Reduction Target (reduced from FY08 base year ¹)	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sub-Target for Federal Employee Travel	%	15%	15%	15%	15%	15%	N/A	15%
Sub-Target for Contracted Waste Disposal	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sub-Target for Transmission and Distribution Losses from Purchased Energy	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other, as defined by agency	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A				
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A				
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A				

As one of several small agencies tenanted in a GSA-owned and operated building, the ACHP has no ability to manage or report on Scope 3 greenhouse gas emissions other than those generated by employee travel, whether on business or during commuting.

a. Employee travel

Goal Description: Despite repeated requests, the ACHP has been unable to secure aggregate information on its business travel from GSA or from the Department of the Interior (the agency that provides certain administrative support services to the ACHP, including e-gov travel services). During FY 2010, the ACHP will review its internal files and compile data on business travel for FY 2009. Using this as a baseline, the ACHP will develop specific targets for reducing GHG production because of employee business travel.

For travel by employees while commuting, the ACHP will monitor employee access to the federal transit benefit program and will encourage individual employees not enrolled to do so.

Agency Lead For Goal: The Office of Administration (OA) will be responsible for data collection, development of targets, implementation, and oversight.

Implementation Methods: Once the ACHP has generated a baseline figure for FY 2009 and 2010 employee business travel and developed specific targets for reducing GHG production, management will incorporate an additional layer of review in the approval process for business travel to ensure that modalities are selected that reduce the agency’s production of GHG.

For GHG production caused by commuting, the ACHP will monitor utilization of the federal transit benefit program and will counsel individual employees about the effect of their transit choices on GHG emissions.

Positions: All work required to monitor and report on sustainability efforts will be accomplished as a collateral duty by OA staff.

Planning Table: By December 2010 the ACHP will have generated baseline data for business travel. Implementation of the employee commuting component will be ongoing.

- b. Contracted waste disposal
- c. Transmission and distribution losses from purchased energy

As one of several small agencies tenanted in a GSA-owned and operated building, the ACHP has no ability to manage or report on Scope 3 GHG emissions other than those generated by employee travel.

3. GOAL: Develop and Maintain Agency Comprehensive GHG Inventory

As one of several small agencies tenanted in a GSA-owned and operated building, the ACHP has no ability to manage or report on Scope 1,2, or 3 GHG emissions except for those generated by commuter and business travel. Development of an ACHP comprehensive greenhouse gas inventory would not be productive.

4. GOAL: High-Performance Sustainable Design / Green Buildings

SUSTAINABLE HIGH PERFORMANCE BUILDINGS (Buildings Meeting Guiding Principles)	Units	FY 10	FY 11	FY 12	FY 13	FY 14	FY 15
Owned Facilities Targets	%	N/A	N/A	N/A	N/A	N/A	N/A
Leased Facilities Targets	%	N/A	N/A	N/A	N/A	N/A	N/A
Total Facility Targets	%	N/A	N/A	N/A	N/A	N/A	N/A
Other, as defined by agency	?	N/A	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A			
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A			
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A			

While the ACHP does not manage a building portfolio (the ACHP is a tenant in a federally owned, GSA-managed building), the agency is uniquely positioned to develop guidance to assist property-managing agencies in addressing sub-goal (h). The ACHP Task Force on Sustainability and Historic Preservation will oversee development of such guidance, using existing staff and financial resources. It is anticipated that the guidance will be completed no later than the end of calendar year 2010. The ACHP will coordinate with CEQ on maximizing distribution of the guidance to federal agencies.

5. GOAL: Regional and Local Planning

REGIONAL AND LOCAL PLANNING	Units	FY 10	FY 11	FY 12	FY 13	FY 20
Other, as defined by agency	?	N/A	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A			
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A			
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A			

While the ACHP does not manage a building portfolio (the ACHP is a tenant in a federally owned, GSA-managed building), the agency can assist in the development of guidance for agencies in addressing sub-goal (c). As part of a guidance development process being coordinated by CEQ, the ACHP will provide comments to the Department of Transportation (DOT) as that agency revises the recommendations on sustainable locations for federal facilities that it developed under Section 10 of the Executive Order. The ACHP will focus on how guidance should address the goals and requirements of national historic preservation law and policy, which explicitly speaks to location of federal facilities in Executive Order 13006: "Locating Federal Facilities On Historic Properties In Our Nation's Central Cities," and the Public Buildings Cooperative Use Act (Public Law 94-541). The ACHP Task Force on Sustainability and Historic Preservation will oversee coordination with CEQ and DOT, using existing staff and financial resources.

6. GOAL: Water Use Efficiency and Management

WATER USE EFFICIENCY & MGMT	Units	FY 10	FY 11	FY 12	FY 13	FY 14	FY 15	FY 20
Potable Water Reduction Targets (gal/SF reduced from FY07 base year)	%	6%	8%	10%	12%	14%	16%	26%
Planned Potable Water Reduction (gal/SF reduced from FY07 base year)	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Industrial, Landscaping, and Agricultural Water Reduction Targets (gal reduced from FY10 base year)	%	-	2%	4%	6%	8%	10%	20%
Planned Industrial, Landscaping, and Agricultural Water Reduction (gal reduced from FY10 base year)	%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other, as defined by agency	?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A					
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A					
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A					

The ACHP is one of several tenants in a GSA-owned and operated building. GSA is responsible for a building water use efficiency and management policy.

7. GOAL: Pollution Prevention and Waste Elimination

POLLUTION PREVENTION & WASTE ELIMINATION	Units	FY 10	FY 11	FY 12	FY 13	FY 14	FY 15
Non-Hazardous Solid Waste Diversion Targets (non C&D)	%	N/A	N/A	N/A	N/A	N/A	N/A
C&D Material & Debris Diversion Targets	%	N/A	N/A	N/A	N/A	N/A	N/A
Other, as defined by agency – REDUCE PAPER USAGE	reams	15	5	5	5	5	5
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A			
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A			
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A			

- a. Increase source reduction of pollutants and waste
- b. Divert at least 50% non-hazardous solid waste by FY 2015, excluding construction and demolition (C&D) debris
- c. Divert at least 50% C&D materials and debris by FY 2015

The ACHP is one of several tenants in a GSA-owned and operated building. GSA is responsible for meeting these goals.

- d. Reduce printing paper use
- e. Increase use of uncoated printing and writing paper containing at least 30% postconsumer fiber

Goal Description: The ACHP will reduce in-house printing paper use by using default settings on distributed printers and copiers to double-sided printing. The ACHP will increase the use of uncoated printing and writing paper containing at least 30% post-consumer fiber when purchasing paper for in-house use as well as specifying same for printing done commercially.

Agency Lead For Goal: OA will be responsible for data collection, development of targets, implementation, and oversight.

Implementation Methods: The ACHP has identified a baseline figure for FY 2009 of 63 cases of plain copy paper. Most, but not all, existing printers in-house are capable of two-sided printing; those that are not will be replaced when necessitated by repair history. During the last quarter of FY 2010, the ACHP will monitor paper usage to determine if the rate has declined with the advent of two-sided printing. For printing done commercially through the Government Printing Office's SPA program, the ACHP will specify that the paper used must be uncoated and containing at least 30% post-consumer fiber.

Positions: All work required to monitor and report on sustainability efforts will be accomplished as a collateral duty by OA staff.

Planning Table: Analysis of paper usage will be done quarterly.

- f. Reduce and minimize the acquisition, use, and disposal of hazardous chemicals and materials
- g. Increase diversion of compostable and organic materials from the waste stream
- h. Implement integrated pest management and landscape management practices to reduce and eliminate the use of toxic and hazardous chemicals and materials
- i. Increase agency use of acceptable alternative chemicals and processes
- j. Decrease agency use of chemicals to assist agency in achieving FY 2020 GHG reduction targets [See Section II - 1 and 2 above]
- k. Report in accordance with Sections (301-313) of the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986

The ACHP is one of several tenants in a GSA-owned and operated building. GSA is responsible for meeting these goals.

8. GOAL: Sustainable Acquisition

SUSTAINABLE ACQUISITION	Units	FY 10	FY 11	FY 12	FY 20
New Contract Actions Meeting Sustainable Acquisition Requirements	%	65%	95%	hold	hold	hold
Energy Efficient Products (Energy Star, FEMP-designated, and low standby power devices)	%	75%	75%	75%	75%	75%
Water Efficient Products	%	N/A	N/A	N/A	N/A	N/A
Biobased Products	%	N/A	N/A	N/A	N/A	N/A
Recycled Content Products	%	85%	85%	85%	85%	85%
Environmentally Preferable Products/Services (excluding EPEAT)	%	70%	70%	70%	70%	70%
SNAP/non-ozone depleting substances	%	N/A	N/A	N/A	N/A	N/A
Other, as defined by agency	?	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A		
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A		
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A		

- a. 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 (excluding EPEAT-registered products), non-ozone depleting, contain recycled content, or are non-toxic or less toxic alternatives.
- b. 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.

Sustainable acquisition offers a significant opportunity for the ACHP’s participation in supporting Executive Order 13514. Although virtually all of the ACHP’s product acquisition is accomplished through small purchasing and generally is limited to

purchasing office supplies, the ACHP intends to procure recycled, green, and environmentally sustainable products whenever practicable.

Goal Description: The ACHP’s purchase of office supplies and similar material is very limited. For example, the total for FY 2009 was \$12,500 and the total to date in FY 2010 is \$8,200, with a significant portion of those expenditures being on office paper. Within this admittedly modest budget, the ACHP will seek opportunities to procure recycled, green, and environmentally sustainable products whenever feasible.

Agency Lead For Goal: OA will be responsible for data collection, development of targets, implementation, and oversight.

Implementation Methods: The ACHP does not collect data that would provide a reliable baseline figure for FY 2009 or FY 2010 of the percentage of products (by price) purchased that were recycled, green, or environmentally sustainable. The ACHP will seek a 25% rate of purchase for “green” products with each individual purchase.

Positions: All work required to monitor and report on sustainability efforts will be accomplished as a collateral duty by OA staff.

9. GOAL: Electronic Stewardship and Data Centers

ELECTRONIC STEWARDHIP & DATA CENTERS	Units	FY 10	FY 11	FY 12	FY 13
% of device types covered by current Energy Star specifications that must be energy-star qualified	%	65%	90%	95%	hold
% of electronic assets covered by sound disposition practices	%	100%	100	100	100
% of cloud activity hosted in a data center	%	25%	30%	60%	hold
% of agency data centers independently metered or advanced metered and monitored on a weekly basis	%	N/A	90%	100%	hold
Reduction in the number of agency data centers	%	N/A	20%	40%	hold
% of agency, eligible electronic products with power management and other energy-environmentally preferable features (duplexing) actively implemented and in use	%	50%	95%	100%	hold
% of agency data centers operating at an average bandwidth utilization of 85%	%	0%	100%	100%	hold
% of agency data centers operating with an average CPU utilization of 60-70%	%	50%	50%	75%	hold
% of agency data centers operating at a PUE range of 1.3 – 1.6	%	10%	25%	50%	hold
% of covered electronic product acquisitions that are EPEAT- registered	%	75%	95%	95%	hold
% of agency data center activity implemented via virtualization	%	10%	30%	40%	hold
Other, as defined by agency	?	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A	N/A	
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A	N/A	
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A	N/A	

- 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 Computers for Learning (CFL) or other non-profit organizations, and/or recycling through a private recycler certified under the Responsible Recyclers (R2) guidance or equivalent.

Goal Description: The ACHP will move to cloud computing and server virtualization to improve electronic stewardship of overall IT and data center resources. The ACHP will continue its current practice of disposal of excess or surplus electronic products through environmentally sound methods.

Agency Lead For Goal: OA will be responsible for data collection, development of targets, implementation, and oversight.

Implementation Methods: The ACHP will achieve these goals through the use of improved software tools, staff technical training, and purchase of energy efficient hardware. Virtualization will reduce the number of servers required to perform existing tasks thus lowering power requirements. A side benefit is the reduction of heat output which further lowers energy consumption.

Positions: All work required to monitor and report on sustainability efforts will be accomplished as a collateral duty by OA staff.

Planning Table: The ACHP expects to reduce the number of servers by 15% over the next two years. This is based upon current technology and business needs and does not consider growth in new applications. Where increased needs result in increased equipment demands, the ACHP will employ virtualization and where appropriate, cloud computing.

10. GOAL: Agency Innovation

AGENCY INNOVATION	Units	FY 10	FY 11	FY 13	FY 20
Other, as defined by agency	?	N/A	N/A	N/A	N/A	N/A
Leveraged Investment (funded through annually recurring existing budget items, such as capital improvement, O&M, etc. or ARRA)	\$ M	N/A	N/A			
Incremental Investment (funded through new program budget requests specific to this EO)	\$ M	N/A	N/A			
Alternative Investment (funded through ESPC, UESC, EUL, PPA, rebates, or other funding assistance)	\$ M	N/A	N/A			

In addition to the actions described for Goals 4 and 5 above, the ACHP will explore other avenues for promoting historic preservation as a sustainability tool and assisting agencies in addressing preservation of historic properties as they work to meet their goals under Executive Order 13514. Anticipated activities include the following:

- In accordance with Executive Order 13287, each federal agency must designate a senior policy level official to have policy oversight responsibility for the agency's historic preservation program. That official, or a subordinate employee reporting directly to the official, then serves as the agency's Federal Preservation Officer, a position each agency must maintain in accordance with the National Historic Preservation Act. In the fall of 2010, the ACHP will convene a meeting of agency senior preservation officials and Federal Preservation Officers, and sustainability will be a principal agenda topic. The ACHP's Office of Federal Agency Programs will oversee coordination of the meeting using existing staff and financial resources.
- Executive Order 13287 also requires that agencies with real property management responsibilities report every three years on progress in the identification, protection, and use of historic properties in federal ownership and make this report available to the ACHP and the Secretary of the Interior. The ACHP then incorporates the received data into a report on the state of the federal government's historic properties and their contribution to local economic development that is submitted to the President. The next reporting deadline for agencies is September 30, 2011. The ACHP will revise or supplement its existing advisory reporting guidelines to ask agencies for information on how they are pursuing sustainability goals in their management of historic properties. The ACHP's Office of Federal Agency Programs will oversee guidance development, using existing staff and financial resources.

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?	Yes
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:

None needed (see above).

- II. What is your agency's planned actions for the following year (in 6 month increments, July-Dec 2010 & Jan-June 2011) to achieve the sustainability and energy standards for success on the OMB Scorecard? Please use short, descriptive, and action-oriented bullets for key milestones and associated target dates. Agencies may highlight text within its Sustainability Plan to emphasize these key actions and milestones.

July-December 2010

- Closely monitor requests for travel authorizations to ensure only mission-critical travel is undertaken and that alternatives to travel are implemented whenever doing so will not undermine the agency's mission.
- Develop baseline data for FY 2008 and 2009 on business travel.
- Monitor employee access to transit benefit program and encourage individual employees not enrolled to do so.
- Implement staff coordination and communication plan to emphasize agency-wide teamwork to address GHG goals.
- Develop guidance to assist property-managing agencies in adopting best practices and technology in rehabilitation of historic federal properties.
- Provide comments to the Department of Transportation as it revises the recommendations on sustainable locations for federal facilities developed under Section 10 of the Executive Order.
- Monitor paper usage to determine if the rate has declined with the advent of two-sided printing.
- When contracting through GPO for commercial printing, specify that the paper used must be uncoated and contain at least 30% post-consumer fiber.
- Seek a 20% rate of purchase for "green" products within each individual purchase requirement.
- Seek opportunities to reduce the number of servers.
- Convene a meeting of agency senior preservation officials and Federal Preservation Officers regarding sustainability and historic preservation. Revise or supplement existing advisory reporting guidelines for implementation of Section 3 of Executive Order 13287 to

ask agencies for information on how they are pursuing sustainability goals in their management of historic properties.

January-June 2011

- Continue to monitor requests for travel authorizations to ensure only mission-critical travel is undertaken and that alternatives to travel are implemented whenever doing so will not undermine the agency's mission.
- Continue to monitor employee access to transit benefit program and encourage individual employees not enrolled to do so.
- Monitor paper usage to determine if the rate has declined with the advent of two-sided printing.
- When contracting through GPO for commercial printing, specify that the paper used must be uncoated and contain at least 30% post-consumer fiber.
- Seek a 20% rate of purchase for "green" products within each individual purchase requirement.
- Seek opportunities to reduce the number of servers.