

June 30, 2017

2017 Strategic Sustainability Performance Plan

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Policy statement

The Consumer Financial Protection Bureau (CFPB) is committed to demonstrating leadership in environmental stewardship. As part of this commitment, the CFPB complies with or exceeds requirements regarding sustainability, and specifically the Executive Order (E.O.) 13693- Planning for Federal Sustainability in the Next Decade. From its creation, the CFPB has been dedicated to improving the environment by performing our operations in a sustainable and environmentally responsible manner. We participate in transportation programs that promote sustainability, and our employees have come together to create a Green Team that promotes awareness for sustainable programs.

In accordance with E.O. 13693, the CFPB will annually submit a Strategic Sustainability Performance Plan to include a Policy Statement, Executive Summary, Table with the Size & Scope of Agency Operation, and our efforts to contribute to federal sustainability goals. As a Contributing Agency, the CFPB will strategically leverage our resources to implement functions and programs to contribute to the federal government achieving its overall sustainability goals. The Bureau will also work towards increasing stakeholder education and engagement through continuous improvement and advancing sustainable operations and initiatives. We will continue evaluating, monitoring, and reporting on our efforts on sustainable initiatives in the future.



Larry D. Pauling

Chief Sustainability Officer

1. Executive summary

The Consumer Financial Protection Bureau (CFPB) was established on July 21, 2010 under Title X of the Dodd- Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203 (Dodd-Frank Act). The CFPB was established as an independent Bureau within the Federal Reserve System and is an Executive Agency as defined in Section 105 of Title 5, United States Code, and is not subject to the Chief Financial Officers Act.

The CFPB headquarters offices (1700 G Street, 1625 I Street) are located in Washington, DC with regional offices in San Francisco, Chicago, New York, and Washington, DC. The headquarters offices are temporarily housed at 1275 First Street, NE, Washington DC until late 2017 when it relocates back to the 1700 G Street building.

The CFPB is the nation's first federal agency focused solely on consumer financial protection. The Dodd-Frank Act established the CFPB for the purpose of ensuring that all consumers have access to markets for consumer financial products and services and such markets are fair, transparent, and competitive.

As of April 15, 2017, 30.2% of the Bureau's total workforce of 1,668 FTEs does not have a duty station in a Bureau office building (headquartered or regional), as a significant portion of the Bureau's workforce travels frequently for Bureau work and has a home duty station when not traveling.

The CFPB is committed to integrating sustainability principals into its operations and will continue to support initiatives and strategies that promote a sustainable future. The CFPB is improving the energy efficiency of our facilities, reducing greenhouse gas emissions with sustainable transportation programs, preventing pollution through sustainability awareness programs, and reducing waste through sustainable practices in our facilities.

The CFPB is making great progress on its sustainability efforts as evidenced by our pursuit of a Leadership in Energy and Environmental Design (LEED) Certification of Gold for the headquarters building renovation project (see CFPB's LEED Scorecard in Appendix C).

1.1 Vision

The CFPB strives to be a positive actor in the federal executive branch and to comply with the provisions of Executive Order (E.O.) 13693 to the extent they apply to the Bureau. The CFPB will continue to focus on integrating sustainable practices throughout the Bureau and look for sustainability opportunities. The CFPB is committed to ensuring all levels of the Bureau are aware of sustainable opportunities and determining how best to implement those opportunities within their functional areas. The CFPB believes in creating a culture of sustainability and promoting sustainable practices throughout the Bureau.

1.2 Leadership

The Director of the CFPB designated the Director of Facilities within the Operations Division as the CFPB Chief Sustainability Officer (CSO) to lead the agency's sustainability efforts and ensure contribution to the federal government's implementation of target goals as outlined in E.O. 13693. The CSO coordinates the CFPB's strategic sustainability efforts by defining roles and responsibilities and providing guidance for implementation and achievement of the Bureau's sustainability goals. The CSO coordinates with the Chief Administrative Officer, Chief Acquisition Officer, Chief Financial Officer, Chief Information Officer, Chief Human Capital Officer, General Counsel, and their designees and other stakeholders to develop and implement Bureau-wide sustainability processes and efforts. Each office plays an important role in contributing to sustainability efforts by conducting sustainable practices, promoting environmental protection and preservation, reducing energy consumption, and advancing applicable sustainability goals for the Bureau.

1.3 Performance review

The CFPB has a strong focus and commitment to strategic sustainability goals as outlined in E.O. 13693. Based on past achievements, current initiatives, and future objectives, the CFPB will continue to demonstrate a commitment to sustainability programs. Below we have provided a performance review on the following goals: (1) greenhouse gas reduction, (2) sustainable buildings, (3) fleet management, (4) water use efficiency and management, (5) pollution prevention and waste reduction, (6) sustainable acquisition, (7) electronic stewardship

and data centers, and (8) renewable energy.

Goal 1: Greenhouse gas reduction

TRANSIT SUBSIDY PROGRAM

The CFPB facilitates its employees commuting via public transportation, by participating in the Department of Transportation's Transit Subsidy Program. The CFPB has developed a policy for its Transit Subsidy Benefit Program (Transit Program) and has established an informational page for its employees.

The purpose of the Transit Program is to encourage employees to use public transportation when commuting to and from work. The CFPB provides a public transit benefit that is equal to participating employees' actual monthly commuting costs, up to the maximum tax-free limit allowed by law. The maximum tax-free public transit benefit an employer may provide to its employees increased to \$255 per month on January 11, 2016. Currently, the CFPB has 800 employees participating in the program in Washington, D.C. and regional offices.

BIKE TRANSPORTATION

Commuting by bike has many benefits. Among such potential benefits are: (1) decreasing the carbon footprint; (2) avoiding traffic jams; (3) improving overall well-being; and (4) saving money on fuel. The CFPB encourages employees to commute by bike through the offering of several programs. CFPB participates in annual biking events held on various dates in the spring and summer across the U.S. to promote biking as a means of commuting to and from work. The CFPB has information on bike resources that provides many online tools to promote biking and help CFPB staff bike to and from work. In addition, the CFPB participates in the Capital Bikeshare Program. The program provides over 2500 bicycles at 300 stations across Washington, D.C., Arlington and Alexandria, VA and Montgomery County, MD. The program currently has approximately 160 CFPB participants. The Capital Bikeshare Program serves several different purposes, including reducing CFPB's carbon footprint and encouraging sustainable commuting strategies.

TRAVEL REDUCTION STRATEGIES

While travel is critical to the functioning of the Bureau, the CFPB has taken many steps to keep travel to the minimum required, including: (1) locating the duty stations for examiners near areas where they conduct examinations; (2) ensuring that on-line training programs are available to employees; (3) taking steps to make a variety of outreach efforts available without the need for travel; and (4) adding desktop video calling capability for every Bureau employee,

to facilitate virtual face-to-face conversations in lieu of engaging in local and distance travel for in-person meetings.

As of April 15, 2017, approximately 504 employees participate in the home duty stationing. The CFPB will continue to explore workplace flexibilities and best practices in the public and private sector to ensure employees are provided with competitive work/life incentives.

The CFPB has robust employee on-line training and learning programs to help minimize travel. The CFPB leverages thousands of titles of online and on-demand learning resources, including self-paced eLearning courses, online books, learning articles, and video vignettes. All of these resources are delivered online and via software applications utilized by employees remotely. Program offices take their training and information sharing offerings on the road to regional meetings in order to reduce the number of trips by home duty stationed or regional employees to Washington, D.C.

The CFPB utilizes an array of approved social networking tools and programs to attract prospective candidates. This enables the CFPB to expand candidate outreach nationally without requiring physical travel, thus helping to reduce greenhouse gases. The CFPB utilizes digital platforms to maximize engagement reach, including the Professional Diversity Network Program, a digital platform that enables the publication of CFPB job opportunities to a broad array of diverse target populations. Also, CFPB employees volunteer as ambassadors of the Bureau and are provided with the tools, messages, and resources to reach out to their own professional networks.

TELECOMMUTING

The CFPB has a telework program that allows for up to three days of telework per week as well as alternative work schedules (AWS). Employees who have worked at the Bureau for a minimum of 60 days are eligible to participate in the program. Both programs (telework and AWS) will help reduce greenhouse gases by allowing for greater workplace flexibilities to minimize commuting. This chart provides data on current telework participation:

Telework Participation	Employee Participation	Telework Participation %
1 or 2 days during a two-week period	291	25.5%
3 or more days during a two-week period	132	11.6%
Situational telework	233	20.4%
Total Telework Participation	656	57.54%

(Data as of September 30, 2016 and is extracted from the Annual Telework Program Report submitted to OPM. The total Bureau headcount at this time was 1,649 with 1,140 employees eligible and subject to the telework program (all percentages are measured against this count of eligible).

Goal 2: Sustainable buildings

SUSTAINABLE BUILDING ELEMENTS INCLUDED IN THE CFPB RENOVATION PROJECT

The CFPB is renovating its headquarters building and has registered the renovation project with the Green Building Certification Institute with the intent to achieve LEED Gold certification. As part of the renovation project, the CFPB's goal is to create workplaces using environmentally sustainable products and processes that provide a clean, healthy workplace environment, free of harmful contaminants and excessive noise, with access to quality air, light, and water. The following sustainable elements are included in the project.

Site Sustainability Elements: The selection of a previously developed site has a positive impact by not disturbing other undeveloped areas. There is no net increase in parking capacity and one building will include charging stations for electric vehicles. The design of the building and adjacent plaza minimizes the heat island effect, reducing impact on microclimate and aiding in improving overall building performance. The vegetated roofs and planted areas in the plaza contribute to reducing the heat island effect. Rainwater from the building and site will be collected and treated on-site by a water reuse treatment system. A combination of treated rainwater and cooling tower condensate will be reused for irrigation and indoor flush fixtures. The storm water management strategy contributes towards the storm water design quality and quantity credits in the LEED rating system.

Energy Efficiency Elements: Energy efficiency is a primary goal for the project, not only to contribute towards achieving LEED Gold, but also to comply with the Federal Mandates related to energy reduction. Current energy model results reflect approximately 20% reduction in energy

cost, as compared to the ASHRAE 09.1-2007 baseline building. Strategies to achieve expected energy savings include high-performance glazing, chillers, boilers, energy recovery components, economizers, chilled beams, daylighting controls, occupancy sensors, and reduced lighting power densities. Also through mechanical system upgrades, the quantity and quality of ventilation will be improved, increasing the air quality for occupants to help improve wellness and productivity. In addition, the upgraded mechanical systems will use refrigerants that have a decreased effect on ozone depletion. The building systems will also be commissioned to ensure they operate and perform efficiently and effectively. Daylighting will be used as a method of conserving energy by illuminating the perimeter office space with natural light. Automatic daylight sensors with dimming and smart controls will regulate the amount of artificial light needed to adequately light the perimeter spaces. The project includes end-use energy metering devices integrated into the building automation system. These systems will log the performance of the energy systems to facilitate the measurement and verification process.

Indoor Environmental Quality Elements: Indoor environment quality has a significant influence on the occupant's well-being and productivity. Smoking is prohibited in the building and within 25 feet of all entries and outdoor air intakes, as indicated by signage. Current LEED goals include outdoor air delivery monitoring. A permanent monitoring system will ensure the ventilation systems maintain the minimum outdoor air rate at all times. Carbon dioxide monitors will be installed in densely occupied spaces. To prevent the introduction of contaminants that are irritating and harmful to the construction workers and building occupants, interior finish materials, including paints and coatings, adhesives and sealants, and flooring systems comply with the VOC limits in the LEED rating system. In addition, a construction indoor air quality management plan will be implemented during construction and before occupancy.

OTHER SUSTAINABLE CFPB LEASED BUILDINGS

Currently, the CFPB temporarily occupies two GSA leased buildings with Green Building Institute Certifications of LEED Gold. Both buildings contain sustainable elements for energy and water efficiency, such as daylighting controls, economizers, occupancy sensors, and energy management control systems.

Goal 3: Fleet management

The CFPB's fleet consists of two (2) vehicles leased from GSA on an annual basis that use fuel containing up to 85% ethanol (E-85). These flex fuel vehicles help reduce the dependence on oil and contribute to building the green energy economy.

Goal 4: Water use efficiency & management

WATER EFFICIENCY ELEMENTS INCLUDED IN THE CFPB RENOVATION PROJECT

Reducing potable water demand is a high priority for the renovation project. Water-efficient plumbing fixtures will be used throughout the renovated headquarters building. The CFPB has implemented two innovative strategies to manage rainfall on-site and increase the water efficiency of the building and exterior areas. One strategy is the inclusion of a green or vegetated roof area on a large portion of the building roof. The green roof area will mitigate an urban heat island effect (which occurs when a high proportion of dark surfaces in a city increases the surrounding ambient temperature and help to absorb much of the rainfall). The second strategy is the treatment and reuse of the rainfall on site. A majority of the rain that falls on the building and plaza area will be collected and diverted to an underground cistern located in the parking garage, then treated and reused for landscape irrigation and other non-potable purposes within the building. This reuse system minimizes the amount of potable water that is needed for the building and completely eliminates the need for potable water for irrigation. These strategies in combination with low flow water fixtures throughout the building will achieve a high level of water efficiency and present a leading-edge example of water conservation and management.

Goal 5: Pollution prevention & waste reduction

WASTE REDUCTION ELEMENTS INCLUDED IN THE CFPB RENOVATION PROJECT

The CFPB Headquarters Renovation Project LEED materials and resources credits aim to reduce the quantity of waste while improving the building environment through responsible materials selection. The CFPB focused on the conservation and responsible sourcing of materials in order to reduce waste and emissions from material transportation, and to minimize harmful impacts on human health and the environment. The existing building structure is mostly maintained and restored in order to minimize resource consumption and retain the character of the original building. New materials were selected to include a high percentage of recycled content and responsibly sourced wood, and to be sourced from within the region whenever possible to reduce transportation-related emissions. During construction, all materials are tracked and sent to reuse or recycling centers when possible in order to minimize the amount of waste going to landfill sites. The projected is expected to have more than 75% of the construction waste diverted from landfill.

RECYCLE PROGRAM

The CFPB established recycling procedures named “Know Before You Throw” to help contribute

to the goal of pollution prevention and waste reduction. (see Appendix B for CFPB Recycling Procedures)

SHREDDER BIN CONTRACT SERVICES

The CFPB has contract services to provide shredder bins in pantry areas on each floor in the headquarters facility for collection of paper and CDs that contain privacy information. The contract requires the services contractor to provide verification that materials are recycled.

PERSONAL PROPERTY ASSET MANAGEMENT

The CFPB provides for disposal of personal property assets through the GSA Services Program to promote reuse by other federal agencies or the sale of personal property to the public.

WASTE REDUCTION WITH SIGNAGE MANAGEMENT

The CFPB has corkboards in common areas in all DC-based buildings to consolidate places where paper signs are being posted throughout the buildings. This process cuts down on the number of signs posted and paper wasted by directing employees to specific areas to find information on upcoming events.

LIBRARY OF ONLINE REFERENCE MATERIALS

The CFPB operates a library of online reference materials managed by the CFPB Library. With a digital system, there is less paper, less ink, less production and transportation and thus a reduction in carbon emissions. This program is an environmentally sound practice that reduces the need for paper products, thus reducing pollution and waste.

Goal 6: Sustainable acquisition

PROCUREMENT STRATEGY

The CFPB is committed to sustainable acquisitions and explores opportunities to leverage acquisitions that include sustainable materials, equipment, products, services, and practices. When feasible, the Procurement Office incorporates language and clauses into contract documentation to support the bureau's sustainability efforts. The CFPB utilizes GSA's Federal Supply Schedules that include sustainability acquisition clauses.

PROCUREMENT OF ENERGY STAR QUALIFIED PRODUCTS

The CFPB procures equipment with the ENERGY STAR efficiency rating. This includes, but is not limited to, refrigerators, microwave ovens, televisions, supplemental air units, and other electrical powered equipment.

SUSTAINABLE ACQUISITION ELEMENTS INCLUDED IN THE CFPB RENOVATION PROJECT

The CFPB will obtain LEED points for purchasing new construction materials from local vendors in lieu of long-distance shipment of materials.

Goal 7: Electronic stewardship & data centers

The CFPB makes substantial use of off-site cloud computing solutions, reducing the need to operate its own data centers. This strategy not only helps save energy but also allows for increased use of remote collaboration tools including Lync, Google Hangout, and other remote video teleconferencing tools. This strategy also makes it easier for CFPB employees to work from home and reduces the need for travel which helps contribute to greenhouse gas reduction.

The CFPB enables energy saving strategies for electronic equipment such as computers, monitors, and printers. Printers are by default set to print double-sided with grayscale color and the sleep features for electronic equipment are set to activate when not in use for a period of time. In addition, about half of the electric power circuits in CFPB's temporary headquarters building are set to turn off during periods of inactivity, saving on energy during nights and weekends.

Goal 8: Renewable energy

ELECTRICAL POWER FROM WIND FARM

CFPB's electrical utility contract includes a 10% renewable electrical power content component that requires the electrical power supplier to provide electrical power from wind energy to contribute to sustainability efforts.

2. Progress on E.O. 13693 priorities

2.1 Executive Order 13693 performance contracting challenge

The CFPB has not entered into any energy performance contracts. The CFPB has incorporated energy saving and sustainable practices into the design and construction of its headquarters facility.

2.2 Climate preparedness and resilience

The CFPB applied to the U.S. Green Building Council's LEED for Gold certification of the headquarters building. Also, the CFPB has a Green Team that promotes an environmentally friendly culture, including paperless presentations, low-ink printing, and recycling. In addition, the CFPB has two bio-fuel vehicles leased annually from the General Services Administration.

2.3 Electric and zero emission vehicles

Currently, the CFPB has two GSA leased vehicles and expects to replace these vehicles at the end of Fiscal Year 2017 with Hybrid Vehicles.

APPENDIX A:

Size and scope of Agency operation

Agency size and scope	FY2015	FY2016
Total Number of Employees as Reported in the President's Budget	1,464	1,555
Total Acres of Land Managed	0	0
Total Number of Buildings Owned	0	0
Total Number of Buildings Leased (GSA and Non-GSA Lease)	5	8
Total Building Gross Square Feet (GSF)	781,178	872,543
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	2	2
Total Number of Exempted-Fleet Vehicles (Tactical, Law Enforcement, Emergency, Etc.)	0	0
Total Amount Contracts Awarded as Reported in FPDS (\$Millions)	\$244	\$187.8

APPENDIX B:

CFPB Recycling procedures

Building	Recycling procedures
One Constitution Square 1275 First Street, NE	<p>Single stream recycling: Paper, cardboard, glass, rinsed plastic, and metal containers can be commingled in any of the bins marked for mixed recycling in the pantries. In addition, each desk is equipped with a blue recycling container.</p> <p>Stonebridge-Carras Management manages the building. Please refer to Stonebridge's recycling poster for a list of acceptable and unacceptable recyclables.</p>
1625 Eye Street NW	<p>Single stream recycling: Glass, plastic, and aluminum can be commingled in any of the recycling bins located in every kitchen area.</p> <p>Paper recycling containers for white paper, colored paper, newspapers, and magazines (and nearly every other form of paper) are located in every copy room. Paper placed into any of the secure shredding bins will also be recycled. Desktop collection bins for paper are available from Facilities.</p> <p>1625 Eye Street NW is a LEED Gold building and is inspected for compliance with DC's commercial recycling regulations. Brookfield Properties maintains records of each recycling audit in the on-site property management office. Violations of the District's recycling laws are subject to tickets and fines ranging from \$25 to \$1000. For more information, review the recycling manual for tenants at 1625 Eye.</p>

APPENDIX C:

CFPB's Leadership in Energy and Environmental Design (LEED) Scorecard:

Issued for Construction | February 19, 2018

LEED 2009 for New Construction and Major Renovations		Consumer Financial Protection Bureau	
Project Checklist			
22	2	2	Sustainable Sites Possible Points: 26
Y	T	N	
1			Prereq 1 Construction Activity Pollution Prevention
5			Credit 1 Site Selection 1
1			Credit 2 Development Density and Community Connectivity 5
6			Credit 3 Brownfield Redevelopment 1
1			Credit 4.1 Alternative Transportation—Public Transportation Access 6
3			Credit 4.2 Alternative Transportation—Bicycle Storage and Changing Rooms 1
2			Credit 4.3 Alternative Transportation—Low-Emitting and Fuel-Efficient Vehicles 3
1			Credit 4.4 Alternative Transportation—Parking Capacity 2
1			Credit 5.1 Site Development—Protect or Restore Habitat 1
1			Credit 5.2 Site Development—Maximize Open Space 1
1			Credit 6.1 Stormwater Design—Quantity Control 1
1			Credit 6.2 Stormwater Design—Quality Control 1
1			Credit 7.1 Heat Island Effect—Non-roof 1
1			Credit 7.2 Heat Island Effect—Roof 1
1			Credit 8 Light Pollution Reduction 1
10	0	0	Water Efficiency Possible Points: 10
Y	T	N	
4			Prereq 1 Water Use Reduction—20% Reduction
2			Credit 1 Water Efficient Landscaping 2 to 4
4			Credit 2 Innovative Wastewater Technologies 2
4			Credit 3 Water Use Reduction 2 to 4
14	7	14	Energy and Atmosphere Possible Points: 35
Y	T	N	
Y			Prereq 1 Fundamental Commissioning of Building Energy Systems
Y			Prereq 2 Minimum Energy Performance
Y			Prereq 3 Fundamental Refrigerant Management
7	5	7	Credit 1 Optimize Energy Performance 1 to 19
2			Credit 2 On-Site Renewable Energy 1 to 7
2			Credit 3 Enhanced Commissioning 2
2			Credit 4 Enhanced Refrigerant Management 2
3			Credit 5 Measurement and Verification 3
2			Credit 6 Green Power 2
9	1	4	Materials and Resources Possible Points: 14
Y	T	N	
2	1		Prereq 1 Storage and Collection of Recyclables
1			Credit 1.1 Building Reuse—Maintain Existing Walls, Floors, and Roof 1 to 3
2			Credit 1.2 Building Reuse—Maintain 50% of Interior Non-Structural Elements 1
2			Credit 2 Construction Waste Management 1 to 2
2			Credit 3 Materials Reuse 1 to 2
2	2	3	Materials and Resources, Continued
Y	T	N	
2			Credit 4 Recycled Content 1 to 2
2			Credit 5 Regional Materials 1 to 2
1			Credit 6 Rapidly Renewable Materials 1
1			Credit 7 Certified Wood 1
10	2	3	Indoor Environmental Quality Possible Points: 15
Y	T	N	
Y			Prereq 1 Minimum Indoor Air Quality Performance
Y			Prereq 2 Environmental Tobacco Smoke (ETS) Control
1			Credit 1 Outdoor Air Delivery Monitoring 1
1			Credit 2 Increased Ventilation 1
1			Credit 3.1 Construction IAQ Management Plan—During Construction 1
1			Credit 3.2 Construction IAQ Management Plan—Before Occupancy 1
1			Credit 4.1 Low-Emitting Materials—Adhesives and Sealants 1
1			Credit 4.2 Low-Emitting Materials—Paints and Coatings 1
1			Credit 4.3 Low-Emitting Materials—Flooring Systems 1
1			Credit 4.4 Low-Emitting Materials—Composite Wood and Agrifiber Products 1
1			Credit 5 Indoor Chemical and Pollutant Source Control 1
1			Credit 6.1 Controllability of Systems—Lighting 1
1			Credit 6.2 Controllability of Systems—Thermal Comfort 1
1			Credit 7.1 Thermal Comfort—Design 1
1			Credit 7.2 Thermal Comfort—Verification 1
1			Credit 8.1 Daylight and Views—Daylight 1
1			Credit 8.2 Daylight and Views—Views 1
6	0	0	Innovation and Design Process Possible Points: 6
1			Credit 1.1 Innovation in Design: EP - Double Transit Ridership 1
1			Credit 1.2 Innovation in Design: EP - Maximize Open Space 1
1			Credit 1.3 Innovation in Design: EP Heat Island: Nonroof 1
1			Credit 1.4 Innovation in Design: Green Building Education 1
1			Credit 1.5 Innovation in Design: Reduced Mercury? 1
1			Credit 2 LEED Accredited Professional 1
2	2	0	Regional Priority Credits Possible Points: 4
Y	T	N	
1			Credit 1.1 Regional Priority: MRc1.1 Building Reuse 1
1			Credit 1.2 Regional Priority: SSo6.1 Stormwater Design, Quantity Control 1
1			Credit 1.3 Regional Priority: WEG2 Innovative Wastewater Technologies 1
1			Credit 1.4 Regional Priority: EAo1 Optimize Energy Performance 1
73	14	23	Total Possible Points: 110