Description of document:	Department of the Interior (DOI) Inspector General (OIG) response to a Congressional request for "agency"-specific information on climate change, 2013
Requested date:	03-August-2013
Released date:	16-September-2013
Posted date:	23-September-2013
Source of document:	FOIA Officer Office of Inspector General U.S. Department of the Interior 1849 C Street, NW MS-4428 Washington, DC 20240 Fax: 202-219-1944 (Attn: FOIA Officer) Email: FOIA@doioig.gov

OFFICE OF
INSPECTOR GENERAL
U.S.DEPARTMENT OF THE INTERIOR

VIA EMAIL

September 16, 2013

Re: 13-FOI-00089

This is in response to your letter dated August 3, 2013, which was received by the Office of Inspector General (OIG) on the same date. In your letter, you requested the following information under the Freedom of Information Act (FOIA), 5 U.S.C. § 552: documentation provided to the Bicameral Task Force on Climate Change in response to their February 25, 2013 letter request to OIG signed by Co-Chairs Henry A. Waxman, Sheldon Whitehouse, Edward J. Markey and Benjamin L. Cardin.

A search was conducted and enclosed are copies the letters and attachments sent to the Bicameral Task Force on Climate Change. There are 99 pages responsive to your request. Approximately 12 pages contain some information that is being withheld and 87 pages are being released in their entirety.

Deletions have been made of information that is exempt from release under the provisions of 5 U.S.C. §§ 552 (b)(5) and (b)(6). These sections exempt from disclosure are items that pertain to: (1) inter-agency or intra-agency memoranda or letters which would not be available by law to a party other than an agency in litigation with the agency; (2) personnel and other similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. Exemption (b)(5) was used to protect draft information which was not intended to be published. Exemption (b)(6) was used to protect the personal privacy interests of low ranking federal employees.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552(c) (2006 & Supp. IV (2010). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

If you disagree with this response, you may appeal the decision by writing to the following no later than 30 workdays after the date of the final response:

Office of the Solicitor

Office of the Solicitor
FOIA Appeals Officer
U.S. Department of the Interior
1849 C Street, NW
MS-6556
Washington, DC 20240
foia.appeals@sol.doi.gov

The FOIA Appeal Officer's facsimile number is 202-208-6677. Your appeal should be filed in accordance with the regulations set out in 43 C.F.R. §§ 2.57-2.64, a copy of which is enclosed.

As part of the 2007 FOIA amendments, the Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS in any of the following ways:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001
E-mail: ogis@nara.gov
Web: https://ogis.archives.gov
Telephone: 202-741-5770
Facsimile: 202-741-5769
Toll-free: 1-877-684-6448

However, should you need to contact me, my telephone number is 202-208-0886, and the email is: guest_jonathan_zeriselassie@doioig.gov

Sincerely,

Jonathan Zeriselassie
FOIA Specialist

Enclosures(2)

Jonathan Zeriselassie

CORRESPONDENCE

U.S. DEPARTMENT OF THE INTERIOR
OFFICE OF INSPECTOR GENERAL
Correspondence Tracking System
Control Sheet

Control No.: 2013-C-00109 **Operator:** [redacted]

Originator: Congressmen Waxman/Markey SenatorsWhitehouse/Cardin

Subject: Climate Change

Receive Date: 02/28/2013 **Document Date:** 02/25/2013

Acknowledgment Due Date: 02/28/2013 **Final Response Due Date:** 03/14/2013

Acknowledgment Date: **Final Response Date:** 04/01/2013

Assignee: KIMBERLY ELMORE - ASST IG FOR AUDITS INSPEC. & EVAL.

Assignment Comments: fyi Kolesnik. Delaplaine. Per Mary, let's meet tomorrow to discuss.

Response Comments: [redacted] prepared response letters w/six attachments 3-29-13. Mary signed and [redacted] processed the letters.

	To	Action	INIT.	DATE IN	DATE OUT
R					
O					
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N					
G					

Congress of the United States
Washington, DC 20515

February 25, 2013

The Honorable Mary L. Kendall
Acting Inspector General
U.S. Department of the Interior
1849 C Street N.W., Mail Stop 4428
Washington, D.C. 20240

Dear Ms. Kendall:

Earlier this month, the Government Accountability Office added climate change to its High Risk List. GAO found that climate change "presents a significant financial risk to the federal government." According to GAO, "[t]he federal government is not well organized to address the fiscal exposure presented by climate change." As the co-chairs of the Bicameral Task Force on Climate Change, we are seeking your help in assessing whether the U.S. Department of the Interior is doing everything it can to confront this growing threat.

There are existing requirements that federal agencies carry out policies to address climate change. In 2007, Congress enacted the Energy Independence and Security Act, which requires federal agencies to reduce the energy intensity of federal buildings 30% by 2015, to achieve even greater reductions when renovating existing buildings or constructing new ones, and to designate an energy manager to conduct evaluations and commissioning processes. In 2009, the President issued Executive Order 13514, which directs federal agencies to establish a greenhouse gas emission reduction target for 2020, to reduce vehicle fleet petroleum use by 30% by 2020, and to ensure that 95% of applicable contracts meet sustainability requirements. The order also required the agencies to "evaluate agency climate-change risks and vulnerabilities to manage the effects of climate change on the agency's operations and mission in both the short and long term." In 2010, the President announced that the federal government will reduce its greenhouse gas pollution by 28% by 2020 as a result of targets submitted under Executive Order 13514.

Additionally, the President issued a memorandum requiring agencies to enhance their building energy efficiency through performance-based contracts totaling a minimum of $2 billion across the federal government. Federal agencies also recently released their latest Strategic Sustainability Performance plans, which for the first time include their plans "to reduce the vulnerability of Federal programs, assets, and investments to the impacts of climate change, such as sea level rise or more frequent or severe extreme weather."

As the first part of our request, we ask that you (1) identify the existing requirements in legislation, regulation, executive order, and other directives that apply to the government entity you oversee, (2) assess whether it is meeting these requirements, and (3) if it is not fully meeting the requirements, make recommendations for improving its performance.

In his State of the Union address, the President recognized that additional action by federal agencies is needed to combat climate change. The President called upon federal agencies to "identify additional executive actions from across the administration to help reduce pollution, prepare our cities and nation for the worsening effects of climate change, and accelerate the transition to more sustainable sources of energy." This call to action presents an opportunity and obligation for agencies to develop strategies to meet the challenge of preventing and responding to climate change.

As the second part of our request, we seek your assessment of (1) the authorities the government entity you oversee has to reduce emissions of heat-trapping pollution, (2) its authorities to make the nation more resilient to the effects of climate change, and (3) the most effective additional steps it could take to reduce emissions or strengthen resiliency.

Because this is now a timely matter before both the executive and legislative branches, we ask that you provide answers to these questions as expeditiously as possible, ideally no later than March 29, 2013. If you have any questions, you can contact Kiren Gopal of Rep. Waxman's House Energy and Commerce Committee staff at Kiren.Gopal@mail.house.gov or Emily Enderle of Sen. Whitehouse's staff at Emily_Enderle@whitehouse.senate.gov.

Thank you for your assistance.

Sincerely,

Henry A. Waxman
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Energy & Commerce

Sheldon Whitehouse
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Oversight, Senate
Committee on Environment and Public Works

Edward J. Markey
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Natural Resources

Benjamin L. Cardin
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Water and Wildlife, Senate
Committee on Environment and Public Works

OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

APR - 1 2013

The Honorable Henry A. Waxman
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Energy and Commerce
U. S. House of Representatives
Washington, D.C. 20515

Dear Mr. Waxman:

In response to the Bicameral Taskforce on Climate Change letter dated February 25, 2013 we are providing the following information for your consideration.

The U.S. Department of the Interior (DOI) has taken multiple steps aimed at mitigating climate change impacts. Some of these include efforts to reduce electricity and fuel consumption; increase the procurement of energy efficient products, and adapt management approaches to the effects of climate change. DOI has documented these activities in its 2012 Strategic Sustainability Performance Plan, as well as in previous year's plans (see Enclosure 1). The plan facilitates DOI's internal efforts to adapt natural and cultural resource management activities to changing conditions; avoid or minimize impacts to people and built assets; work with tribes in their adaptation efforts; and provide scientific information and tools to support the range of activities and programs that DOI oversees in the face of climate change.

In addition, the 2012 plan contains an appendix detailing DOI's Climate Change Adaptation Plan for 2013, which outlines initiatives to reduce the vulnerability of DOI's programs, assets, and investments to the impacts of climate change, such as sea level rise or more frequent or severe extreme weather. The plan highlights both the accomplishments and challenges that DOI currently faces in the climate change arena. DOI tracks its efforts and reports its progress on an annual scorecard (see Enclosure 2). These reports were issued independently of OIG.

In response to your request, we have identified the appropriate authorities that mandate actions toward the mitigation of climate change impacts that are followed by the Department:

- the Energy Policy Act of 2005;
- the Energy Independence and Security Act of 2007;
- Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management";
- Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance";

- the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 et seq.

In addition, DOI also has a variety of Departmental Manual (DM) chapters that specifically address greenhouse gas emissions and climate change impacts. For example, the DM chapters that relate to reducing greenhouse gas emissions and climate change include, but are not limited to:

- 412 DM 1 "Motor Vehicle Management";
- 515 DM 2 "Environmental Auditing";
- 515 DM 3 "Recycling Programs";
- 515 DM 4 "Environmental Management Systems";
- 518 DM 1 "Comprehensive Waste Management";
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- 523 DM 1 "Climate Change Policy"; and
- 752 DM 1 "Energy Management Program".

The Departmental Manual is available on DOI's Web site (http://elips.doi.gov/elips/).

Moreover, in 2009, the Secretary of the Interior signed Secretarial Order No. 3289; "Addressing the Impacts of Climate Change on America's Water, Land, and Other Natural and Cultural Resources" (see Enclosure 3). This order established a series of eight Climate Science Centers (CSCs) to integrate climate change impact data into tools for managing the Department's land, water, fish and wildlife, and cultural heritage resources. CSCs work in concert with a network of collaborative Landscape Conservation Cooperatives (LCCs) that coordinate adaptation efforts throughout the country. CSCs provide tools, techniques, and data that natural and cultural resource managers can use to anticipate, monitor, and adapt to climate-driven change at all ecological levels. Paired with CSCs, 22 LCCs focus on landscape level initiatives that involve broad-scale, interconnected ecological systems. LCCs are applied conservation science partnerships with two main functions—to provide the science and technical expertise needed to support conservation planning at levels beyond the reach or resources of any one organization; and to promote collaboration among their membership to define shared conservation goals. With these goals in mind, partners (Federal, State, local, tribal, and nonprofit organizations; private landowners; and educational institutions) can identify where and how they will take action to mitigate the impact of climate change.

Regarding our assessment of DOI meeting the requirements of Executive Order 13514 and other governing documents, we are providing copies of previously released OIG reports on issues related to climate change activities within DOI (see Enclosures 4 and 5). Our office is currently finalizing plans to conduct reviews of climate change-related programs within DOI, including inspections, audits, and evaluations of procurement processes, as well as programmatic and operational management aspects of DOI's mitigation efforts. We will focus primarily on the targeted categories identified by DOI and tracked on its scorecard. OIG plans to launch at least two additional reviews before the end of fiscal year 2013, with other reviews scheduled for fiscal year 2014.

DOI also provided a prepared response to your request that specifically highlights key components of the 2012 strategic sustainability plan (see Enclosure 6).

We appreciate the opportunity to respond to the requests of the Bicameral Task Force on Climate Change. If additional information is needed, please feel free to contact Kris Kolesnik, Associate Inspector General for External Affairs, at 202-208-5745.

Sincerely,

Mary L. Kendall
Deputy Inspector General

Enclosures 6

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2. DOI 2012 OMB Scorecard on Sustainability/Energy
3. DOI Secretarial Order 3289
4. DOI Report C-IS-MOI-0008-2008
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OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

APR - 1 2013

The Honorable Sheldon Whitehouse
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Oversight
Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510

Dear Senator Whitehouse:

In response to the Bicameral Taskforce on Climate Change letter dated February 25, 2013 we are providing the following information for your consideration.

The U.S. Department of the Interior (DOI) has taken multiple steps aimed at mitigating climate change impacts. Some of these include efforts to reduce electricity and fuel consumption; increase the procurement of energy efficient products, and adapt management approaches to the effects of climate change. DOI has documented these activities in its 2012 Strategic Sustainability Performance Plan, as well as in previous year's plans (see Enclosure 1). The plan facilitates DOI's internal efforts to adapt natural and cultural resource management activities to changing conditions; avoid or minimize impacts to people and built assets; work with tribes in their adaptation efforts; and provide scientific information and tools to support the range of activities and programs that DOI oversees in the face of climate change.

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Sincerely,

Mary L. Kendall
Deputy Inspector General

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INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

APR - 1 2013

The Honorable Edward J. Markey
Co-Chair
Bicameral Task Force on Climate Change
Ranking Member
Committee on Natural Resources
U. S. House of Representatives
Washington, D.C. 20515

Dear Mr. Markey:

In response to the Bicameral Taskforce on Climate Change letter dated February 25, 2013 we are providing the following information for your consideration.

The U.S. Department of the Interior (DOI) has taken multiple steps aimed at mitigating climate change impacts. Some of these include efforts to reduce electricity and fuel consumption; increase the procurement of energy efficient products, and adapt management approaches to the effects of climate change. DOI has documented these activities in its 2012 Strategic Sustainability Performance Plan, as well as in previous year's plans (see Enclosure 1). The plan facilitates DOI's internal efforts to adapt natural and cultural resource management activities to changing conditions; avoid or minimize impacts to people and built assets; work with tribes in their adaptation efforts; and provide scientific information and tools to support the range of activities and programs that DOI oversees in the face of climate change.

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Deputy Inspector General

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OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

APR - 1 2013

The Honorable Benjamin L. Cardin
Co-Chair
Bicameral Task Force on Climate Change
Chairman
Subcommittee on Water and Wildlife
Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510

Dear Senator Cardin:

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Sincerely,

Mary L. Kendall
Deputy Inspector General

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Department of the Interior

2012 Strategic Sustainability Performance Plan

Rhea Suh
Assistant Secretary - Policy, Management and Budget
and
The Department's Senior Sustainability Officer

Date JUN 25 2012

TABLE OF CONTENTS

Department of the Interior Point of Contact:

Willie R. Taylor
Director
Office of Environmental Policy and Compliance

Agency Policy Statement

The Honorable Nancy Sutley
Chair, Council on Environmental Quality
730 Jackson Place, N.W.
Washington, D.C. 20503
Dear Ms. Sutley,

The Department of the Interior (Department) is fully dedicated, through its mission, to conserve and protect the nation's natural and cultural resources now and for future generations. Implementing sustainability in Department operations is consistent with and complementary to the Department's overarching mission. The Strategic Sustainability Performance Plan (SSPP) supports Interior's mission by integrating sustainability within Department operations and reducing our green house gas (GHG) emissions which, in turn, further demonstrates Interior's commitment to conservation, protection, and the responsible use of natural and cultural resources.

The Department is committed to meeting and or exceeding compliance with environmental and energy statutes, regulations, executive orders (EOs), and other applicable requirements. This commitment is evidenced by the implementation of a department-level environmental management system (EMS) to manage and track progress on achieving the environmental and energy performance goals in EO 13514 and EO 13423.

The Department's Sustainability Council (Council) provides leadership and guidance for SSPP accomplishment. The Council is chaired by me and supported by bureau and office Senior Sustainability Officers, an implementation committee, and technical workgroups that include representatives from all bureaus and appropriate offices. The Council is the implementing and oversight body for the EMS and SSPP. The Department is also committed to addressing climate change and has made it a departmental High Priority Performance Goal. To support the Secretary's Climate Change Adaptation Policy, the Department has completed a Climate Change Adaptation Plan that focuses on both agency-wide and bureau-level actions in FY 13 and beyond.

The Climate Change Adaptation Plan includes nine guiding principles for DOI and its components to adhere to in order to anticipate and adapt to challenges posed by climate change. The Plan will help us prioritize the collection and integration of key data as indicators of how climate change is affecting resources.

The Department is excited about the commitments we have made, the priorities we have set, and the resources we have identified to move us forward in our sustainability efforts. These efforts are integral to the Department's mission and we look forward to enhancing our ability to conserve, protect, and ensure the responsible use of our nation's natural and cultural resources. The dedicated employees of the Department are passionate about our stewardship responsibility for the resources and properties that we manage for the American People. To harness their creativity and energy, the Council will continue to foster opportunities for employees to submit their own ideas for improving sustainable practices at the Department. The creative input of all employees will continue to be invaluable as we work toward our ambitious sustainability goals.

Sincerely,

Rhea Suh
Assistant Secretary
Policy, Management and Budget

Executive Summary

The Department of the Interior (Department) is pleased to submit the 2012 Strategic Sustainability Performance Plan and report continued progress towards meeting our sustainability goals. Our progress can be attributed to the dedication and passion of our employees, the Secretary's continued support of sustainability efforts, the continued emphasis on integrating sustainable practices into the day-to-day operations and activities of the Department, and the sound management structure established to accomplish the SSPP. The Department's Sustainability Council (Council) utilizes an Environmental Management System (EMS) as the management framework for accomplishing sustainability goals. The Council is the guiding and oversight body of the SSPP through implementation of EMS. While the Department has made progress towards achieving its sustainability goals, there are also challenges. The challenges and potential solutions are addressed using a collaborative decision-making process that includes all stakeholders. The Department is proud of the progress made to date and has documented commitments to continue positive progress towards meeting the sustainability goals.

On May 25, 2011, the Secretary signed the Sustainability and Environmental Policy Statement. The Statement was distributed to all Department employees and supports the sustainability ethic that our employees already embody in carrying out our mission to protect America's natural resources and heritage, honor our cultures and tribal communities, and supply the energy to power our future. Some of the highlights of the Department's positive progress on the sustainability goals include:

- Meeting or exceeding energy intensity goals since FY 2007
- Exceeding the FY 2011 renewable electricity goals
- Meeting the alternative fuel vehicles goal since FY 1999
- Decreasing scope 1 and 2 greenhouse gas (GHG) emissions by 6.5% in FY 2011 relative to the FY 2008 baseline, and on track to meet the reduction target goal of 20% by 2020
- Reducing potable water intensity by 11.2% in 2011, relative to the FY 2007 baseline, and on track to meet the reduction target goal of 26% by 2020
- Completing the first annual department-level EMS management review

Some of the projects completed or underway that have contributed to this progress are outlined in the performance review and planning section for each goal. Additionally, the Department strives to share these best practices by highlighting the Department's Environmental Achievement Awards and the Department of Energy's (DOE) Federal Energy Management and Water Awards on the Department's internal and external communication sites. In 2011, the Department was pleased to receive a GreenGov Presidential Award and five DOE Federal Energy Management and Water Awards. The Department's GreenGov Presidential Award winning project can be accessed at: http://www.doi.gov/greening/awards/2011/whc2011.cfm and Federal Energy Management and Water Award recipients can be accessed at: http://www.doi.gov/pam/programs/energy_management/awards.cfm. The Department's Environmental Achievement Awards can be accessed at: http://www.doi.gov/greening/awards/index.cfm.

Along with the success achieved in meeting the sustainability goals, there have been some challenges, including meeting the sustainable buildings (SB) goal, the scope 3 GHG emissions reduction target, and the power management (PM)element of the electronics stewardship goal.

The sustainable buildings goal presents several challenges for the Department. These challenges include a lack of new construction, a large building inventory with many historic buildings, and funding priority is directed to addressing the large backlog of mission-related building deficiencies. However, when repairs or renovations are executed, it is Department policy that the High Performance and Sustainable Building Guiding Principles (GPs) are integrated to the extent possible.

The scope 3 GHG emissions reduction target goal is also a challenge for the Department. Although scope 3 GHG emissions were lower in FY 2011 than FY 2010, the FY 2011 emissions were still above the FY 2008 baseline. The largest contributors to the scope 3 GHG emissions in FY 2011 were employee commuting, business travel, and contracted municipal solid waste disposal (MSW). The increase in business air travel emissions presents a unique challenge as the Department's spending on business travel decreased, but there was not a corresponding decrease in emissions. The increase in emissions is attributed to the fact that flights with the lowest cost have a greater number of trip segments (take-offs and landings) and the majority of GHG emissions from air travel result from take-offs and landings. The emissions increase from contracted MSW disposal is attributed to an increase in the number of departmental facilities reporting their solid waste disposal data.

Finally, meeting the electronics stewardship goal is a work in progress due to the fact that the Department has not fully implemented PM. The Department is pilot-testing the PM program to determine the cost and funding allocation before implementing the program department-wide.

The Department uses a number of tools to implement sustainability at all organizational levels and has multiple plans and processes to support continued progress and address challenges. Two significant components of the strategies are the Sustainability Council and the department-level EMS. The Sustainability Council oversees implementation of the department-level EMS and is chaired by the agency Senior Sustainability Officer (SSO), the Assistant Secretary for Policy, Management, and Budget, Rhea Suh. The Sustainability Council is a multidisciplinary, collaborative decision-making forum for sustainability and environmental compliance. The Council includes senior-level leadership, the bureau and office SSOs and program managers, and technical workgroups (TWG) for each sustainability goal. Each TWG includes multiple bureau and office subject matter experts.

The department-level EMS is the management tool to plan, implement, and monitor progress on the sustainability goals. To help ensure that the Department is on track to meet the sustainability goals, each TWG, bureau, and applicable office has created sustainability action plans that outline specific actions, responsibilities, and timelines for achieving the sustainability goals.

The Department also uses other planning efforts to meet sustainability goals, including implementation of energy savings performance contracts (ESPC), the Fleet Management Plan, the Climate Change Adaptation Plan, as well as addressing employee commuting emissions reductions.

The Department is committed to meeting the requirements of the Presidential Memorandum to implement ESPCs with a planned investment target of $5 million over the next 24 months. There are currently three potential ESPC projects to be awarded by the end of December 2013.

The Department is implementing the Fleet Management Plan (Appendix 3) in accordance with the Presidential Memorandum on Fleet and the subsequent vehicle allocation methodology analysis. These strategies will facilitate the process of "right-sizing" our fleet and increasing its efficiency.

The Climate Change Adaptation Plan (Appendix 2) includes Guiding Principles for the Department to follow in an effort to anticipate and adapt to challenges posed by climate change. The Plan will facilitate the Department in adapting our natural and cultural resources management activities, accounting for changing conditions and avoiding or minimizing impacts to people and built assets, working with tribes in their adaptation efforts, and providing scientific information and tools to support the range of activities and programs we oversee in the face of climate change.

The Department is also taking a proactive approach towards reducing GHG emissions from employee commuting. The 2010 commuter survey report included a summary of actions the Department should consider to reduce GHG emissions from employee commuting. Additionally, the Department created a Telework Steering Committee composed of Senior Executives to bring a multidisciplinary approach to our telework strategy.

The Department is promoting energy saving actions at the employee level. In October 2011, Deputy Secretary David Hayes issued a memorandum to all Department employees as part of President Obama's National Energy Action Month emphasizing simple, everyday actions that conserve energy and protect the environment. The full text of the memo may be accessed at http://www.doi.gov/pam/programs/energy_management/upload/EnergyActionMemo2011.pdf.

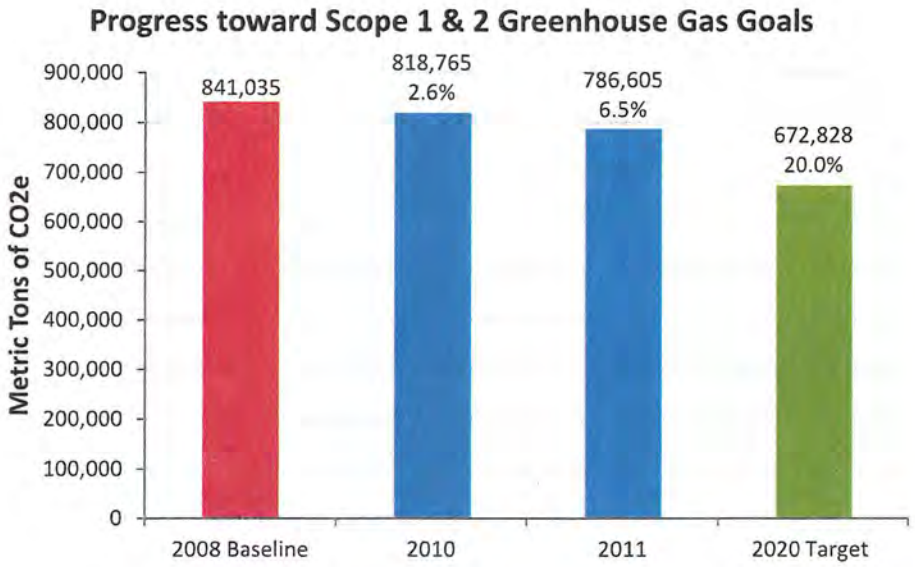
The Department is very proud of the achievements it has made in meeting the sustainability goals, addressing our challenges, and making commitments for continued progress in the future.

TABLE 1: SIZE AND SCOPE OF AGENCY OPERATIONS

Agency Size and Scope	FY 2011
Total Number of Employees as Reported in the President's Budget	70,487
Total Acres of Land Managed	500,000,000
Total Number of Facilities Owned	41,817
Total Number of Facilities Leased (GSA and Non-GSA lease)	1,347
Total Facility Gross Square Feet (GSF)	99,353,197
Operates in Number of Locations Throughout U.S.	2,372
Operates in Number of Locations Outside of U.S.	28
Total Number of Fleet Vehicles Owned	23,844
Total Number of Fleet Vehicles Leased	9,645

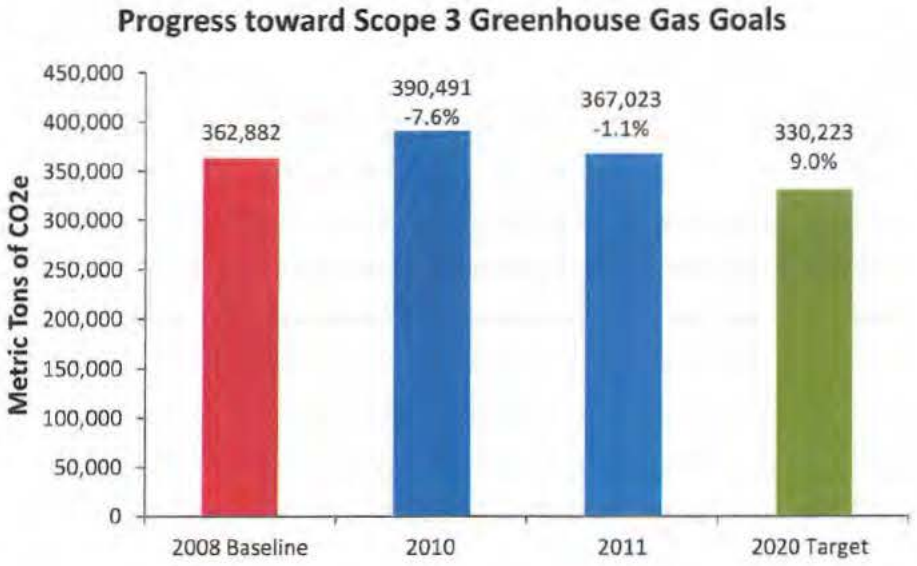
GOAL 1: GREENHOUSE GAS REDUCTION AND MAINTENANCE OF AGENCY COMPREHENSIVE GREENHOUSE GAS INVENTORY

Agency-Specific Performance Metrics for Scope 1 & 2 GHG Emissions Reduction:



Note: E.O. 13514 requires each agency to establish a scope 1 & 2 GHG reduction target for FY2020. The target for this agency is 20% compared to FY2008. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline.

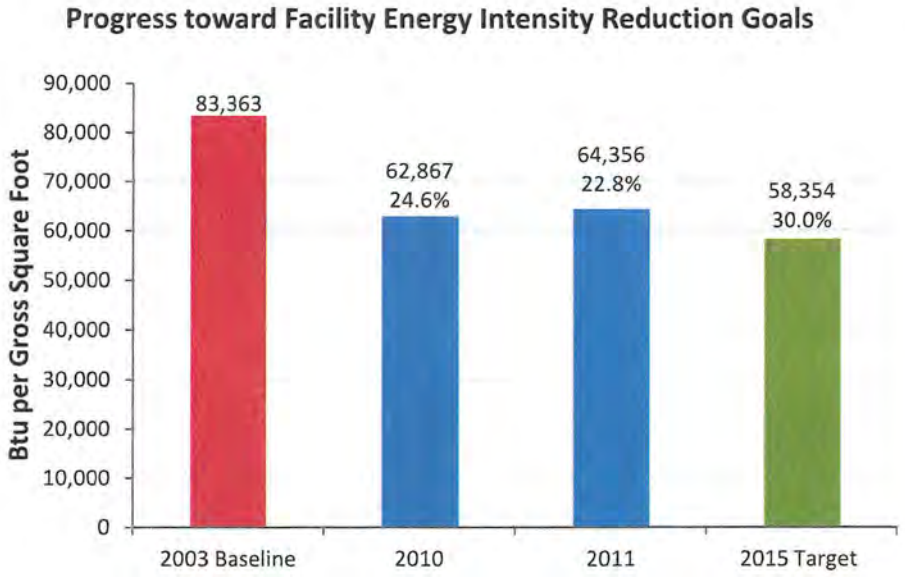
Agency-Specific Performance Metrics for Scope 3 GHG Emissions Reduction:



Note: E.O. 13514 requires each agency to establish a scope 3 GHG reduction target for FY2020. The FY2020 target for this agency is 9% compared to the FY2008 baseline. The red bar represents the agency's FY2008 baseline. The green bar represents the FY2020 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2008 baseline. A negative percentage is reflective of an increase in scope 3 greenhouse gas emissions.

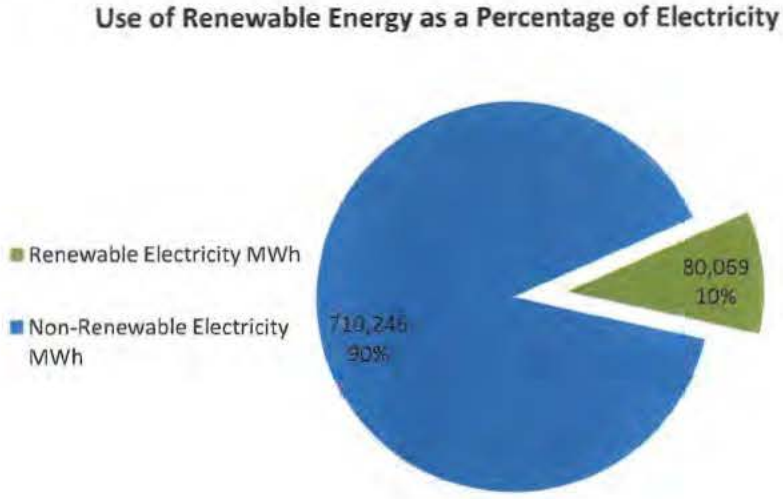
GOAL 2: BUILDINGS

Agency-Specific Performance Metrics for Facility Energy Intensity Reduction:



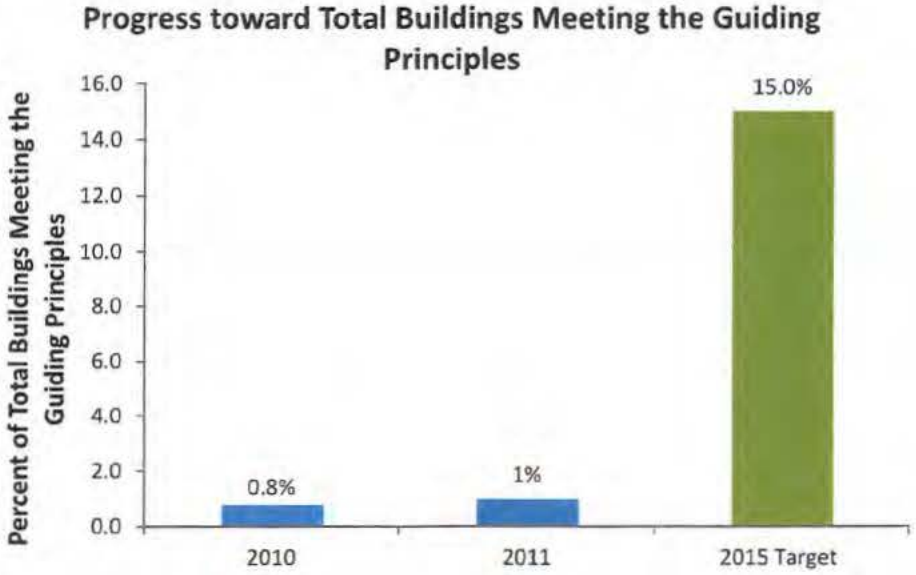
Note: EISA requires agencies to reduce energy intensity by 18% for FY2011, compared to an FY2003 baseline; a 30% reduction is required by FY2015. The red bar represents the agency's FY2003 baseline. The green bar represents the FY2015 target reduction. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2003 baseline.

Agency-Specific Performance Metrics for Renewable Energy:



Note: EPAct requires agencies to increase the use of renewable energy as a percentage of electricity use to 5% by FY2010-2012 and 7.5% by FY2013 and beyond.

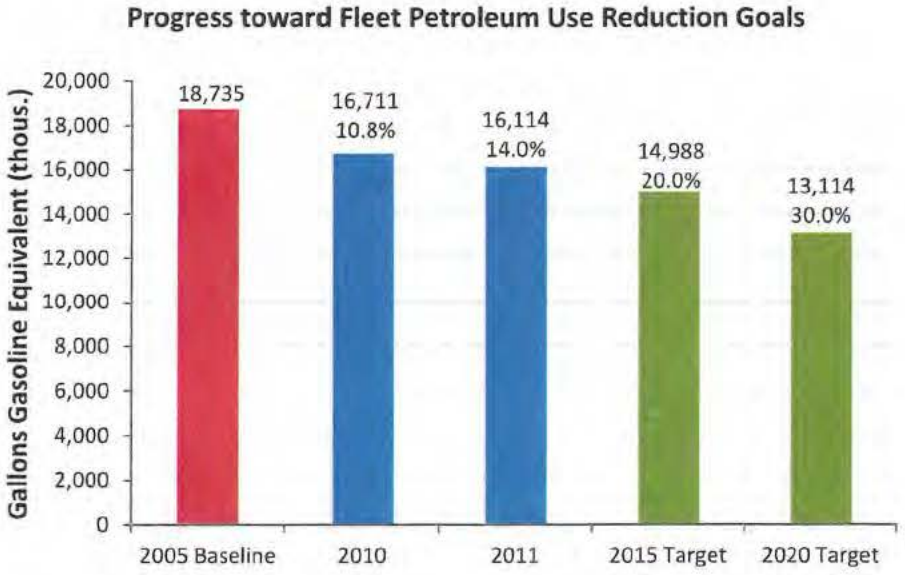
Agency-Specific Performance Metrics for Total Buildings Meeting the Guiding Principles:



Note: E.O. 13514 requires that by FY2011 agencies have 7% of new, existing, and leased buildings >5,000 square feet meet the Guiding Principles; the requirement increases to 15% by FY2015. The green bar represents the FY2015 target. The blue bars show actual progress toward the target.

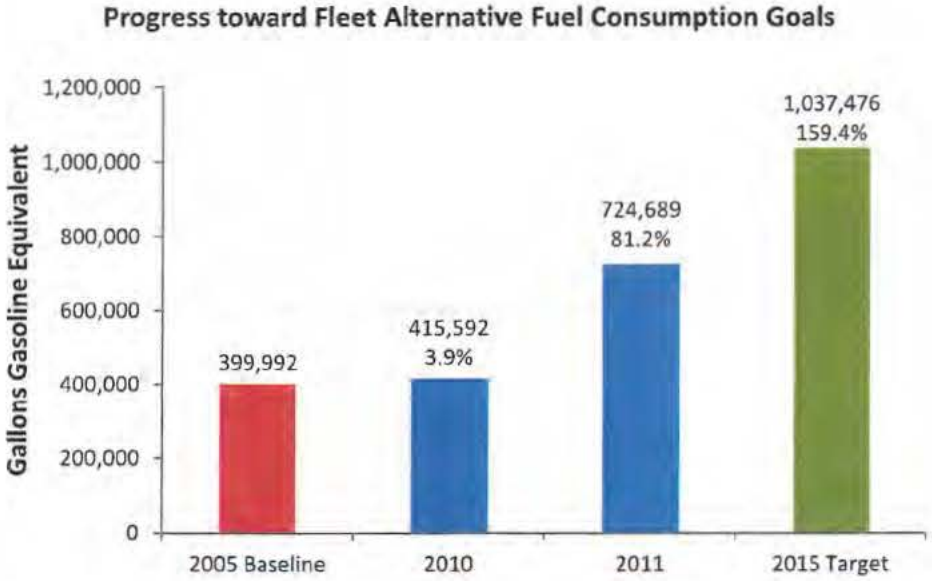
GOAL 3: FLEET MANAGEMENT

Agency-Specific Performance Metrics for Fleet Petroleum Reduction:



Note: E.O. 13514 and EISA require that by FY2011 agencies reduce fleet petroleum use by 12%, compared to an FY2005 baseline. A 20% reduction is required by FY2015 and a 30% reduction is required by FY2020. The red bar represents the agency's FY2005 baseline. The green bars represent the FY2015 and FY2020 target reductions. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2005 baseline.

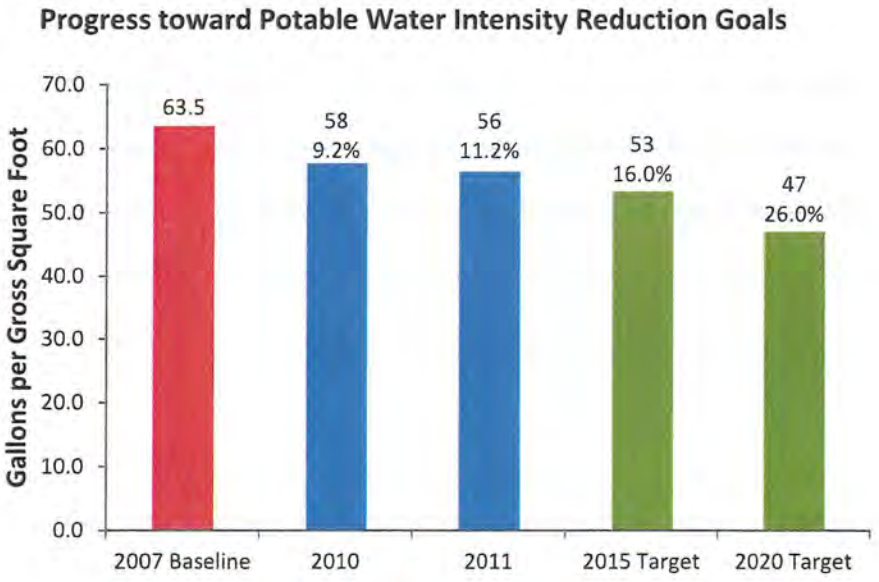
Agency-Specific Performance Metrics for Fleet Alternative Fuel Use:



Note: E.O. 13423 requires that agencies increase total non-petroleum-based fuel consumption by 10% annually compared to an FY2005 baseline. Consequently, by FY2011 agencies must increase alternative fuel use by 77%, compared to an FY2005 baseline. By FY2015, agencies must increase alternative fuel use by 159.4%. The red bar represents the agency's FY2005 baseline. The green bar represents the FY2015 target. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2005 baseline.

GOAL 4: WATER USE EFFICIENCY AND MANAGEMENT

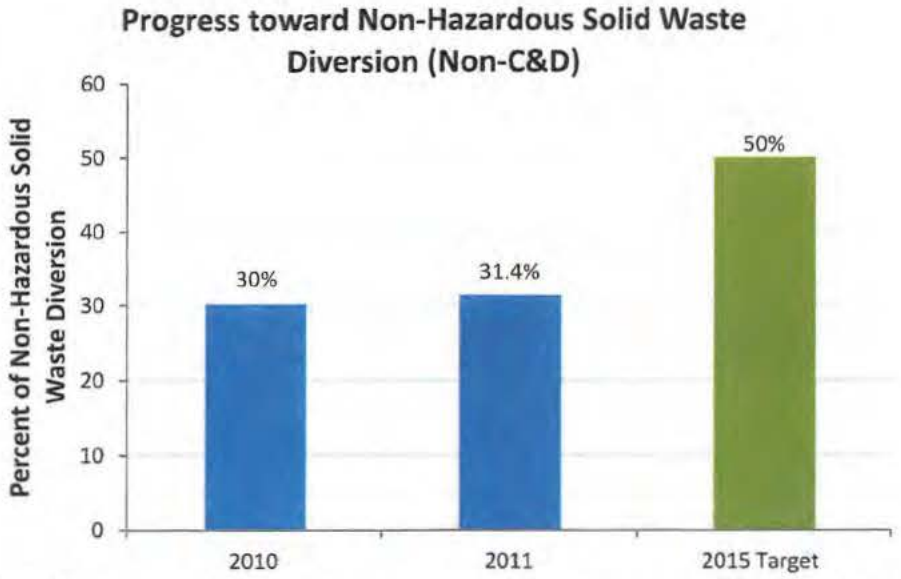
Agency-Specific Performance Metrics for Potable Water Intensity Reduction:



Note: E.O. 13514 requires agencies to reduce potable water intensity by 2% annually through FY2020, compared to an FY2007 baseline. Consequently, by FY2011 agencies are required to reduce potable water intensity by 8%, compared to an FY2007 baseline. A 16% reduction is required by FY 2015 and a 26% reduction is required by FY2020. The red bar represents the agency's FY2007 baseline. The green bars represent the FY2015 and FY2020 target reductions. The blue bars show actual status in relationship to the target. The percentage on each bar shows the reduction or increase from the FY2007 baseline.

GOAL 5: POLLUTION PREVENTION AND WASTE REDUCTION

Agency-Specific Performance Metrics for Non-Hazardous Solid Waste Diversion (Non-C&D):



Note: E.O. 13514 requires that by FY2015 agencies annually divert at least 50% of non-hazardous solid waste from disposal. The green bar represents the FY2015 target. The blue bars show actual progress toward the target.

GOAL 7: ELECTRONIC STEWARDSHIP AND DATA CENTERS

EPEAT	POWER MANAGEMENT	END-OF-LIFE	COMMENTS
			EPEAT and Power Management compliance unknown.

EPEAT:

	95% or more Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide
	85-94% or more Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide
	84% or less Monitors and PCs/Laptops purchased in FY2011 was EPEAT Compliant Agency-wide

Power Management:

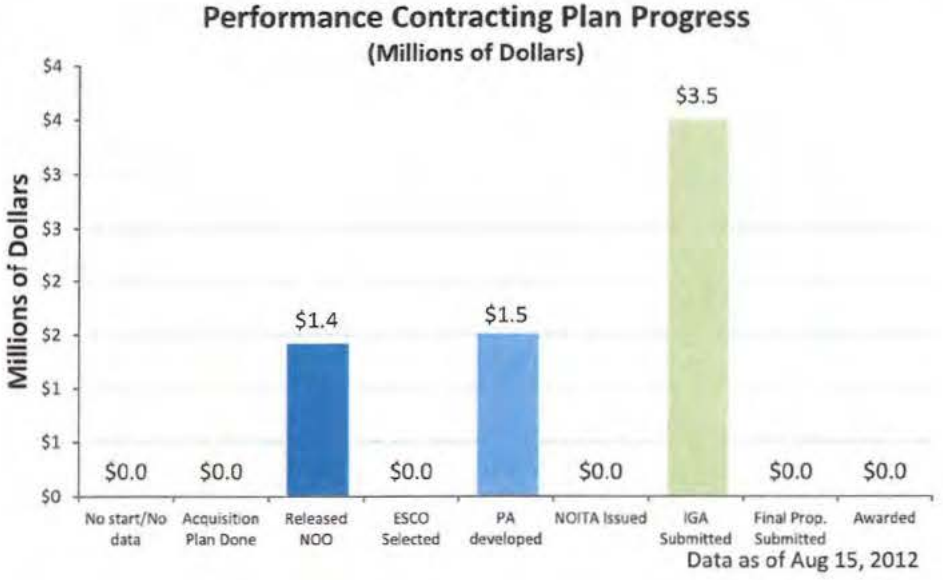
	100% Power Management Enabled Computers, Laptops and Monitors Agency-wide
	90-99% Power Management Enabled Computers, Laptops and Monitors Agency-wide
	89% or less Power Management Enabled Computers, Laptops and Monitors Agency-wide

End-of-Life:

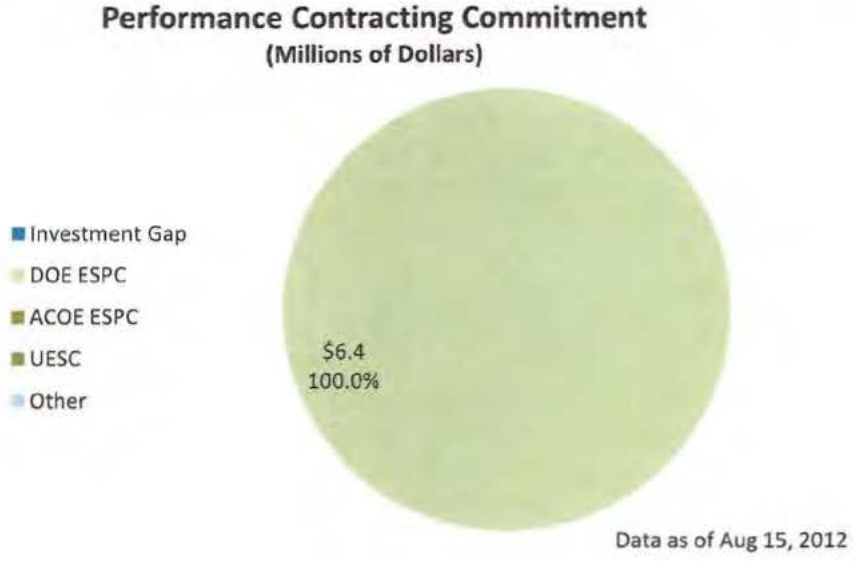
	100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or Certified Recycler (R2, E-Stewards)
	100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or non-Certified Recycler
	Less than 100% of Electronics at end-of-life disposed through GSA Xcess, CFL, Unicor or non-Certified Recycler

PRESIDENT'S PERFORMANCE CONTRACTING COMMITMENT

Agency-Specific President's Performance Contracting Commitment Metrics:



Agency-Specific President's Performance Contracting Commitment Metrics:



Department of the Interior Climate Change Adaptation Plan for FY 2013

The Challenge – Climate Change Impacts to the Department of the Interior

Climate change has profound implications for the Department of the Interior (Department). Trends in climate-related environmental conditions, such as temperature, precipitation, frequency of extreme weather events, and sea level, directly affect our operations and achievement of our mission. The Department's areas of responsibility include managing 20 percent of the nation's lands; supplying water and hydropower in the 17 western states; conserving plants and wildlife; conserving historic and cultural resources; providing geological, hydrological, and biological science; fulfilling trust responsibilities to American Indians and Alaska Natives; providing financial and technical assistance for tribes as well as insular areas such as Guam and the U.S. Virgin Islands; and leasing for renewable and non-renewable energy development on public lands and the Outer Continental Shelf. To manage this broad spectrum of activities, the Department employs about 70,500 employees and more than 300,000 volunteers in approximately 2,400 locations spanning 12 time zones.

The realities of climate change require the Department to integrate adaptation into our diverse operations, programs, plans, and policies. We must adapt our management of natural and cultural resources; account for changing conditions and threats with respect to human and built assets; work with tribes across the nation in their adaptation efforts; and provide scientific information and tools to support the range of activities and programs we oversee in the face of climate change.

This plan builds on and supports numerous efforts by the Department to address climate change impacts. The Department's overall approach is underscored by Secretarial Order 3289, issued in September, 2009 (and amended February, 2010), entitled "Addressing the Impacts of Climate Change on America's Water, Land, and Other Natural and Cultural Resources," that establishes a Department-wide approach for applying scientific tools to "increase understanding of climate change and to coordinate an effective response to its impacts on tribes and on the land, water, ocean, fish and wildlife, and cultural heritage resources that the Department manages." A subsequent section in this plan describes the status of the Department's climate adaptation efforts.

Vulnerabilities to climate change impacts vary widely across the Department's mission areas. Bureaus' climate change adaptation priorities and needs depend on the particular vulnerabilities of their mission and assets. This adaptation plan focuses on actions in FY 2013 and beyond. The actions are framed by the Department's Guiding Principles for climate change adaptation, described below. Climate change adaptation plans and strategies developed by bureaus will articulate and prioritize vulnerabilities particular to their mission and operations. To frame the high-level Guiding Principles and actions in this plan, a broad overview of the Department's vulnerabilities to climate change follows.

Natural and Cultural Resources

The Department's key mission areas under this category are protecting natural, cultural, and heritage resources; improving land and water health; sustaining fish, wildlife, and plant species; providing recreation and visitor experiences; and managing the impacts of wildland fire. At a general level, some major potential impacts (risks and opportunities) to these resources associated with climate change include:

- *Increased temperature and evaporation* may lead to increased numbers of large wildland fires due to increased lightning activity and decreased fuel moisture; longer wildland fire seasons; earlier spring melt and loss of glaciers, permafrost, and sea ice; and increased air and water temperatures that may stress, extirpate, and otherwise affect some species and cultural practices, and damage or destroy cultural and heritage resources;
- *Changes in precipitation patterns* may lead to dramatic changes in moisture and stream flow that impact species, ecosystems, and infrastructure, as well as lead to more severe wildland fire seasons that may alter ecosystems and threaten species and cultural resources; and
- *Sea level rise and higher storm surge* may lead to inundation of, and damage to, coastal ecosystems and cultural and heritage resources.

The Department is responsible for sustainably managing the production of energy as well as the extraction and use of natural resources such as water, timber, and non-energy minerals. With respect to this mission area:

- *Changes in precipitation patterns may cause impacts to:*
  - Stream flow that affect water supply and hydropower production (e.g., via changes in reservoir levels, low summer flow levels, and dewatering in some areas);
  - Reclamation of areas used for production of energy and minerals;
  - Water infrastructure (e.g., drought reducing water levels);
  - Water resources and water quality, for example due to flooding in some areas, and water scarcity due to prolonged droughts;
  - Livestock forage, wood products, tree and forage species distributions; and
  - Channels and stream banks, due to erosion.
- *Increased temperature and evaporation* will reduce seasonal snow storage for water resources management, and will cause increased evaporation and transpiration that may affect public water supply and demand, lakes, streams, and cold water fisheries, and may stress timber and forage species.

People and Communities

With responsibility for about 70,500 employees and more than 300,000 volunteers, service to 1.7 million American Indians and Alaska Natives and as host to nearly 500 million visitors each year, the Department must understand and address the impacts of climate change on people. Much of the human activity of concern to the Department occurs outdoors, in places where climate change impacts will be felt most acutely. Example areas of concern include:

- *An increase in temperature and changes in precipitation patterns* may result in changes in the geographic range and incidence of diseases and health conditions affecting humans;
- *Changes in frequency and intensity of weather-related events, such as heat-waves, precipitation events, and floods* exacerbated by climate change may put lives, livelihoods, and homes and businesses at risk; and
- *These impacts as well as others such as sea level rise and higher storm surge* may affect employee, volunteer, and visitor safety, and recreational opportunities and experiences, with resulting impacts on local employment.

American Indians, Alaska Natives, and Insular Areas

The Department is responsible for advancing government-to-government trust relationships with American Indians and Alaska Natives and honoring commitments to insular areas.[1] With respect to these responsibilities:

- *Increased temperature* would cause:
  - Changes in the incidence of heat-related illnesses and deaths and, in combination with changes in cloud-cover, may affect the incidence of adverse health outcomes related to poor air quality; and
  - *Melting permafrost and reduced sea ice,* threatening livelihoods of Alaska Natives.
- *Sea level rise and higher storm surge* will lead to inundation of and damage to shore ecosystems, dwellings, infrastructure, and cultural and heritage resources (inundation threatens the existence of low-lying island societies).
- Several climate change-related impacts may threaten traditional ways of life that are tied closely to nature, such as increased susceptibility of ecosystems to invasive species and potential migration and extirpation of plant and animal species of importance to native people and indigenous communities.

Infrastructure and Equipment

The Department has significant investments in infrastructure and equipment, including buildings, dams, roads, vehicles, fences, scientific labs, and equipment. These assets typically require significant investments and long-term commitments, and modifications and repairs can be costly. Climate change impacts could alter the operations, efficiency, and safety of infrastructure and equipment, making it more difficult for the Department to achieve its mission and fulfill its responsibilities. Climate change impacts on infrastructure include:

- *Sea level rise and higher storm surge* may damage or reduce the effectiveness of offshore and coastal infrastructure, potentially eliminating access to coastal areas, for example;
- *Changes in precipitation patterns and increased temperature* in some areas may impact operations of buildings, vehicles, and other equipment, and may impact the capacity for dams to supply water and generate electricity;

[1] Insular areas include: The territories of American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands; and the Freely Associated States of the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau.

- *Flooding* may damage buildings, roads, vehicles, and other equipment and dramatically alter water supply planning; and
- *Changes in intensity, timing, and location of weather events* may disrupt energy conversion, generation, transmission, and transportation, and may impose different stresses on the Department's disaster preparedness infrastructure.

Guiding Principles

It is the policy of the Department to anticipate and adapt to challenges posed by climate change to its mission, programs, operations, and personnel. The Department and its component bureaus and offices adhere to the following Guiding Principles for climate change adaptation.[2] Not all Guiding Principles apply to all components within the Department.

A. Science: The Department will use the best available science to increase understanding of climate change impacts, to inform decision making, and to coordinate an effective response to impacts on land, water, wildlife, cultural, heritage, and tribal resources, and other assets. To ensure that climate science and services meet internal decision-making needs, bureaus should:

   - Ensure that management decisions made in response to climate change impacts are informed by science.
   - Build or access regional and local capacity to interpret climate science to inform adaptation plans for infrastructure and natural and cultural resources.
   - Where appropriate, coordinate with other regional science resources in order to inform adaptation plans and actions – e.g., co-locating or integrating scientific efforts with regional climate change science hubs such as the Department of the Interior Climate Science Centers (DOI CSCs) and the National Oceanic and Atmospheric Administration (NOAA) Climate Program Office Regional Integrated Science and Assessment centers.
   - Where appropriate, ensure representation at the executive level on the Stakeholder Advisory Committee for each DOI CSC and the Steering Committee for each Landscape Conservation Cooperative (LCC).
   - Facilitate and support data integration and access to enable broad use of scientific information for management decisions.
   - Consider and incorporate Traditional Ecological Knowledge and long-term observational information as data sources.
   - Ensure that scientific activities conform to appropriate laws and regulations (e.g., Information Quality Act) and apply best scientific practices (e.g., peer review).

B. Ecosystem-Based Management: Integrating the management of natural and human systems and balancing trade-offs to ensure sustainability is essential to success in the face of rapid changes. Ecosystem-based management (EBM) is a science-driven alternative to sector-based or species-based management approaches that are poorly suited to address such

[2] DOI's Guiding Principles are informed by the Interagency Climate Change Adaptation Task Force's "Guiding Principles" and "National Action Plan: Priorities for Managing Freshwater Resources in a Changing Climate;" the National Fish, Wildlife, and Plants Climate Adaptation Strategy; and the National Ocean Council's "Draft National Ocean Policy Implementation Plan."

changes. Effective EBM integrates multiple objectives (ecological, cultural, economic), provides guidance at multiple scales, and requires meaningful input from a broad range of stakeholders, including indigenous communities. While implementing EBM, bureaus should consider employing the following strategies:

- Climate change is a threat multiplier, in that it amplifies and adds complexity to existing impacts and the interactions among them. Bureaus should incorporate into adaptation planning and decision-making consideration of climate change impacts as a component of **cumulative impacts**.
- Climate change adaptation actions cannot be delayed to wait for a complete understanding of climate change impacts; bureaus can use **adaptive management**, as appropriate, for managing resources in the face of uncertainty. Adaptive management can provide feedback to managers as conditions change, by setting project goals carefully and monitoring progress toward stated goals.[3]
- Targeting a single preferred outcome under a single presumed future is not an adequate management strategy in a rapidly-changing environment. Bureaus should employ **scenario planning** to allow planners and managers to explore the effectiveness of various strategies across a range of plausible futures.[4]
- The timing, likelihood, and nature of specific climate risks are difficult to predict. **Risk management** provides an effective means to assess and respond to climate change. Risk management approaches are already used in many critical decisions (e.g., for fire, flood, and disease outbreaks), and can aid in understanding the potential consequences of inaction as well as options for risk reduction.

C. Ecosystems and Wildlife: Bureaus should implement the following general approaches to enhance the ability of ecosystems and wildlife populations to absorb change and maintain key qualities and services:

- Protect diversity of habitat, communities, and species.
- Develop adaptation plans that protect and restore contiguous blocks of un-fragmented habitat and enhance connectivity among habitat blocks.
- Identify and protect resilient ecosystems (i.e., places that can absorb change and maintain healthy community structure and function) and climate refugia (i.e., places that do not exhibit as much change as surrounding landscapes).
- Monitor invasive species (defined as alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health) and coordinate with other agencies to prevent new introductions and stop the spread of such species.
- Consider the landscape context of adaptation actions: Bureaus should work together and with other partners to jointly identify large landscape features (specific corridors, etc.) and mutual conservation goals for their protection.

[3] http://www.doi.gov/ppa/Adaptive-Management.cfm

[4] The principles and general approach for scenario planning in the context of natural resource management are discussed in: Peterson, G.D., G.S. Cumming, and S.R. Carpenter. 2003. Scenario Planning: a Tool for Conservation in an Uncertain World. Conservation Biology 17: 358-366.

- Reduce non-climate stressors that interact with climate change impacts, e.g., pollution, invasive species, habitat fragmentation, and human activities contributing to resource scarcity or degradation of natural resources.

These general approaches reflect "best practices" at the present time; they should be tailored to specific locations and issues and informed by climate-related studies to ensure maximum benefits.

D. Energy, Mining, and Water: The Department is responsible for managing water supplies and leasing areas for mining and development of renewable and non-renewable energy sources. In addition to the implementation of EBM as described above, bureaus should ensure the sustainability of these efforts by adopting the following approaches:

- Employ a basin-wide approach to achieve sustainable water management and to address current and future water shortages, including the potential for decreased water availability due to drought and climate change.
- Focus development activities in ecologically disturbed areas when possible, and avoid ecologically sensitive landscapes, culturally sensitive areas, and crucial wildlife corridors.
- Strengthen and enhance assessments of the vulnerability of water resources to climate change.
- Expand and encourage efficiency measures for water and energy use.

E. Cultural and Heritage Resources: Human societies have inhabited the areas that are now the United States, including affiliated states and insular areas, for many thousands of years. Consequently, many ecosystems and plant, fish, and wildlife species hold cultural significance, as do fixed-place cultural and heritage resources including archaeological sites, prehistoric and historical period structures, districts, cultural and sacred landscapes, and museums and curation facilities. In addition, there are various intangible cultural heritage resources, including inherited traditions or living expressions such as oral traditions, performing arts, social practices, rituals, festive events, knowledge and practices concerning nature and the universe or the knowledge and skills to produce traditional crafts.[5] To address impacts to these resources and the information they provide regarding long-term human interactions with variable environments, managing bureaus should:

- Integrate cultural resources into climate change vulnerability assessments to identify both inventoried resources and uninventoried areas (if any) at risk from projected impacts.
- Use projected climate change impacts as a factor to prioritize completion of cultural resource inventories pursuant to bureau responsibilities under the National Historic Preservation Act (NHPA) Sections 110 and 106, respectively.
- Update or implement cultural resource monitoring systems to track environmental effects that may vary under altered climate regimes and adversely affect cultural resources. Some monitoring needs may overlap partially or fully with natural resource

[5] http://www.unesco.org/culture/ich/index.php?lg=en&pg=00001

monitoring. For example, monitoring of changes in water tables can inform wetland and drainage issues as well as alteration of archaeological sites.

- Coordinate cultural resource preservation and research priorities across local, regional, and national scales (such as through LCC and DOI CSC networks).
- Engage indigenous communities in dialogue and incorporate traditional knowledge in assessing climate change effects on cultural, natural, and heritage resources and developing appropriate adaptation strategies.
- Engage federal stakeholders to coordinate requirements and processes of compliance with NHPA, such as programmatic agreements, for all climate change response actions.
- Incorporate cultural resource significance as a factor in management decisions and adaptation actions for vulnerable resources. Significance determinations may require stakeholder consultation.
- Incorporate knowledge from prehistoric and historic human adaptation (contained in cultural and heritage resources) into contemporary adaptation planning, decision-making, and communication.

F. American Indians, Alaska Natives, and Insular Areas: It is a priority of the Department to work with American Indians, Alaska Natives, and residents of Insular Areas to anticipate and prepare for climate change impacts to their lands, communities, and ways of life. To do so, bureaus should:

- Provide tribes, communities, and Insular Areas with the most recent climate change information and climate adaptation guidance.
- Solicit traditional knowledge from tribes, communities, and villages to complement existing scientific resources on past and present ecological and sociological changes.
- Ensure ongoing inclusion of indigenous groups in any EBM implementation by providing avenues for participation and soliciting information on areas of cultural value.

G. Coordination and Partnerships: Adaptation requires coordination across multiple sectors, geographical scales, and levels of government and should build on the existing efforts and knowledge of a wide range of stakeholders. Bureaus should:

- Coordinate and collaborate with federal, state, tribal, and local governments, and with private landowners, in support of activities that contribute to effective management of species, natural communities, cultural resources, lands, waters, and other assets placed at risk by changing climate conditions.
- Ensure consistent and in-depth government-to-government engagement with tribes and Alaska Natives to address climate change impacts on natural and cultural resources and to apply adaptation strategies.
- Engage with the relevant LCCs to ensure integration with local and regional climate adaptation priorities.
- As appropriate, coordinate with and undertake actions consistent with the National Ocean Policy Implementation Plan; the National Fish, Wildlife, and Plants Climate Adaptation Strategy (NFWPCAS); and the National Action Plan: Priorities for Managing Freshwater Resources in a Changing Climate (Freshwater Action Plan).

- Coordinate scientific activities and plans with the relevant DOI CSCs or the National Climate Change and Wildlife Science Center, and with federal, state, tribal, university, and other science partners to ensure maximum efficiency.
- Adjust partnerships to the scale of the adaptation action. For example, a local adaptation action will be most effective when driven by local interests, risks, and needs, but must also be congruent with regional or landscape-level actions.
- To the extent feasible, include participation from those charged with implementing adaptation plans.
- Support local capacity building since adaptation actions will mainly be implemented at the local level.
- Incorporate outreach efforts into adaptation strategies and actions; tailor adaptation communications to the local context. Communicate information about adaptation plans and projects to stakeholders using clear language that addresses local concerns.
- Provide training bureau staff and managers on climate change, adaptation, and mitigation to increase climate change knowledge within the Department.
- Where possible, implement adaptation strategies and actions that complement or directly support other related management goals such as efforts to improve disaster preparedness, promote sustainable resource management, and reduce greenhouse gas emissions.
- Minimize maladaptation, that is, actions to avoid or reduce vulnerability to climate change that negatively impact, or increase the vulnerability of other systems, sectors, or social groups.

H. Human Health and Safety: The Department will anticipate, prepare for, and develop cost-effective approaches to ameliorate adverse impacts that climate change may have on employees, contractors, volunteers, visitors, and others for whom it has special responsibilities.

I. Infrastructure and Equipment: All components of the Department should consider potential climate change impacts when planning, designing, building, purchasing, leasing, upgrading, maintaining, and decommissioning infrastructure and equipment. The Department should identify and avoid investments that are likely to be undermined by climate impacts, such as investments in infrastructure likely to be subject to repeated floods or inundation.

Status of climate change adaptation at the Department of the Interior

The Department's approach to climate change adaptation is underscored by Secretarial Order 3289, issued September, 2009 (amended February, 2010). The Department and its bureaus have established programs to understand and address climate change impacts, and have begun to integrate adaptation into operations, programs, planning, and policies.

In April 2011, the Bureau of Reclamation (Reclamation) issued a report assessing climate change impacts to western water supplies.[6] The National Park Service (NPS) finalized its Climate

[6] Bureau of Reclamation, SECURE Water Act Section 9503(c) – Reclamation Climate Change and Water, Report to Congress, 2011. http://www.usbr.gov/climate/SECURE/docs/SECUREWaterReport.pdf

Change Response Strategy[7] in 2010 and its Climate Change Action Plan[8] in 2012. In 2010, the U.S. Fish and Wildlife Service (FWS) finalized its Strategic Plan for Responding to Accelerating Climate Change.[9] In 2012, the U.S. Geological Survey (USGS) released a draft science strategy for public comment in advance of a planned 2013 release date of the strategy in final form. The strategy provides a broad set of goals and research priorities that will be used as a key input for USGS Climate and Land Use Change science directions. Other inputs include external stakeholders, DOI Bureaus, other federal and local government agencies, and Congress.

The Department has identified addressing climate change as one of its High Priority Performance Goals: "By September 30, 2013, for 50 percent of the Nation, the Department of the Interior will identify resources that are particularly vulnerable to climate change and implement coordinated adaptation response actions."[10] These assessments are yielding important information to contribute to the understanding of climate change impacts on the Nation's resources and are facilitating the design and implementation of adaptive management strategies for land, water, marine, fish and wildlife, cultural heritage, and tribal resource managers in the face of a changing climate.

The Department recognizes collaboration as fundamental to success in climate change adaptation. In this vein, the Department and its bureaus have initiated and participated in a variety of partnerships at the national, regional, and local levels. DOI CSCs and the nationwide network of LCCs are flagship examples of collaborative efforts that support climate change adaptation by the Department and other land and resource managers across the U.S.

The LCC network consists of 22 landscape-scale partnerships across the nation. Each LCC is led by a steering committee of resource managers. Steering committees identify common priorities, align conservation efforts, and identify key unmet science needs to support and enhance on-the-ground conservation efforts. DOI CSCs function as part of a nationally-coordinated network and provide region-focused management-related climate science. Their scope includes the full range of natural and cultural resources, and their focus is on information needed to manage these resources in the face of climate change and other stressors such as invasive species and changing land use. Working closely with the LCCs, the DOI CSCs are helping to build five- to ten-year strategic science plans that focus on key fundamental science questions needed to develop adaptation strategies.[11]

The Department and its bureaus have also participated in other collaborative climate change adaptation efforts, including, but not limited to:

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[7] National Park Service Climate Change Response Strategy. September 2010. http://www.nps.gov/climatechange/docs/NPS_CCRS.pdf

[8] National Park Service Climate Change Action Plan. 2012. http://www.nps.gov/climatechange/docs/NPS_CCActionPlan.pdf

[9] U.S. Fish and Wildlife Service. September 2010. Rising to the Urgent Challenge – Strategic Plan for Responding to Accelerating Climate Change. http://www.fws.gov/home/climatechange/pdf/CCStrategicPlan.pdf

[10] http://goals.performance.gov/agency/doi

[11] More information on LCCs and DOI CSCs can be found at: http://www.doi.gov/lcc/index.cfm and http://www.doi.gov/csc/index.cfm.

- The Department and bureaus participate in various national-level interagency efforts including the Climate Change Adaptation Task Force, the National Ocean Council, the U.S. Global Change Research Program, and others.
- FWS has co-led development of the Congressionally-mandated NFWPCAS.[12]
- Reclamation and USGS are working with the U.S. Army Corps of Engineers and NOAA to improve understanding of, and preparedness for, climate change impacts to water resources.[13] These bureaus are also working with others to establish a core training program related to climate change science for local, tribal, state, and federal water resources managers (a recommendation in the Freshwater Action Plan).
- With support from the Bureau of Land Management, FWS, NPS, and others, the Bureau of Indian Affairs launched a competitive climate change tribal grant program in 2011.

In addition to those described here, the Department has initiated and supported numerous climate change adaptation activities, including many by regional and field offices. In this Adaptation Plan, the Department identifies high-level actions for implementation in FY 2013 and beyond.

Implementation

The near-term actions identified herein are part of DOI's effort to integrate climate change adaptation into relevant operations, plans, programs, and policies. Ultimately, it is DOI's goal to integrate climate change adaptation agency-wide, including, but not limited to: park, refuge, and public land management; restoration; conservation of species and ecosystems; services and support for tribes and Alaska Natives; protection of cultural, archaeological, and tribal resources; water management; energy and minerals leasing; scientific research and data collection; land acquisition; management of employees and volunteers; visitor services and recreation; and construction and facilities maintenance.

The group responsible for ensuring implementation of this Action Plan is the Energy and Climate Change Council which was established by Secretarial Order 3289 and is led by the Secretary of the Interior. The Department will annually revisit this plan and make revisions and updates, as appropriate.

DOI's Climate Change Adaptation Actions for Fiscal Year 2013 and Beyond

Develop and implement a Departmental Manual Chapter on climate change adaptation outlining the Department's policy and identifying roles and responsibilities for DOI's bureaus and offices

Bureaus and offices within the Department will anticipate and address climate change impacts to their individual mission, programs, and resources. The Department recognized the need for overarching direction and guidance for climate change adaptation and in December, 2012, provided in the Departmental Manual the common policy and components that apply to all bureaus and offices. The Departmental Manual Chapter provides guidance to ensure

[12] http://www.wildlifeadaptationstrategy.gov/

[13] Products from this effort include: "Climate Change and Water Resources Management: A Federal Perspective" (http://pubs.usgs.gov/circ/1331/) and "Addressing Climate Change in Long-Term Water Resources Planning and Management: User Needs for Improving Tools and Information" (http://www.usbr.gov/climate/userneeds/).

accountability, engender a consistent approach, foster internal and external coordination, and allow for monitoring and evaluation of climate change adaptation efforts. Implementation of the new policy is underway.

Review progress in meeting DOI's climate change High Priority Performance Goal and assess next steps beyond FY 2013

DOI's climate adaptation High Priority Performance Goal is one of a limited number of performance goals put in place to measure progress for the Department's high priority activities. The climate adaptation High Priority Performance Goal identifies milestones to be achieved through FY 2013. As part of the continuing review of all of the Department's performance goals, the Department will determine appropriate steps for FY 2014 and beyond based on progress to date and priority needs.

This assessment, and any recommendations for revision, will be complete by the end of FY 2013.

Address priorities and actions called for in cross-cutting planning efforts

Adapting to climate change requires an integrated approach. Taking advantage of past and ongoing collaborative efforts, the Department's bureaus will:

- Identify bureau priority adaptation-related actions called for in relevant cross-cutting planning documents, including the NFWPCAS, the Freshwater Action Plan, and the National Ocean Policy Implementation Plan;
- Plan and/or implement bureau priority adaptation-related actions they have identified; and
- To the extent feasible, avoid actions that are inconsistent with, or contradictory to the goals of relevant cross-cutting planning documents.

This activity will be ongoing, and the Department's bureaus will ensure full implementation of this action by the end of FY 2013.

Implement and update Department of the Interior Climate Science Center strategic science plans

In coordination with DOI bureaus and other partners, all eight DOI CSCs will implement and as necessary update their 5-10 year strategic science plans that focus on key fundamental science questions needed by resource managers to develop adaptation strategies.

All eight plans will be complete in early 2013; plans completed earlier are in implementation, and newly completed plans will move to implementation immediately. The Department will update the plans as necessary.

Develop a chapter for the FY 2012 DOI Economic Report addressing the role of economics in DOI's climate change adaptation efforts

Each year since 2009 DOI has published a report that discusses economic issues relevant to the Department, including the economic impact of its programs and activities. The report covering FY 2012 will include a chapter that evaluates how economics can play a role in the Department's climate change adaptation activities.

The chapter will be complete by the end of the FY 2013.

Conclusion

Climate change adaptation is a long-term endeavor requiring immediate action in combination with investments in monitoring, assessment, flexibility, collaboration, and improved scientific information. This climate change adaptation plan describes, at a high level, the current state of knowledge about the Department's climate change vulnerabilities and adaptation needs, and steps to address them in the near-term. The Department is committed to incorporating adaptation into planning and operations and looks forward to working with federal and nonfederal partners to improve understanding, develop effective tools, and identify and implement best practices.

Department of the Interior Fleet Management Plan In accordance with Vehicle Allocation Methodology (VAM) Analysis

Plan to Achieve Optimal Fleet Inventory and to acquire Alternative Fuel Vehicles by December 31, 2015 [Light-duty vehicles]

DOI currently manages approximately 70,000 employees and 280,000 volunteers and owns and operates approximately 46,400 buildings, 106,300 structures, and 33,000 vehicles at 2,400 locations in over ½ billion acres across the United States, Puerto Rico, and U.S. Territories. The responsibilities for the collection, management, and verification of data required to support the GHG inventory and management are highly dispersed across the bureaus. Furthermore, more than 500 million people a year visit the national parks and monuments, wildlife refuges, and recreational sites that DOI manages. The Department must evaluate if it is possible and how to incorporate its large visitor and volunteer populations into its GHG inventory efforts. The agency recognizes the importance of accounting for and managing all emissions within its operational control and will work toward this end.

The Department's fleet management program provides support to the management of nearly 33,000 fleet motor vehicles nationwide, including over 5,000 alternative fueled vehicles and over 1,300 hybrid vehicles. The DOI's fleet serves a vital supporting role in DOI mission accomplishment. Vehicles are used by Interior employees and authorized volunteers to support multiple mission activities, many in remote areas. In some locations, government vehicles are provided to support service contractors. The average operational location has fewer than 10 employees, several of whom are out in the field each day, using a government vehicle to get from their office to their work site. The Department established a portfolio management approach to operating the motor fleet program.

Each departmental bureau or office completed the vehicle allocation methodology (VAM) analysis and has implemented fleet management plans to guide their fleet management programs. Bureaus have developed strategic direction to optimize the utilization and size of its fleets by linking decisions about acquisition, leasing, replacement cycles, and disposal with strategic goals and mission needs. The Department's fleet management strategy consists of the bureaus and offices implementing and continually updating their plans based on best practices and lessons learned. The plans formulate the framework for improved fleet management. Bureau and office plans are updated annually and incorporate latest statutes and requirements for federal fleet management. Bureau and office plans are reviewed at least annually by the Department's Fleet Manager.

Section 142 of the Energy Independence Security Act required Federal fleets to decrease petroleum consumption, increase alternative fuel use. DOI has worked diligently to reduce petroleum consumption 2 percent annually through 2015 and

increase alternative fuel use 10 percent annually through 2015, both relative to a 2005 baseline. DOI has achieved these goals by:

- Reducing the size and type of vehicle
- Acquiring more fuel-efficient vehicles
- Reducing the DOI fleet (over 10 percent since FY 2005)
- Acquiring over 1,450 more fuel-efficient vehicles through the American Reinvestment and Recovery Act (ARRA) vehicle procurement initiative
- Increasing the number of alternative fueled vehicles and hybrid-electric vehicles in the Department's fleet inventory

Beginning in the FY 2011 vehicle acquisition cycle, the Department began the process to replace less fuel-efficient vehicles with more fuel-efficient vehicles, alternative fueled vehicles, and hybrids. These vehicles reduce the Federal government dependence on petroleum and increase the fuel efficiency of the Departmental fleet. The VAM process has given the Department the strategic goal to implement measures to begin the process to acquire all alternative fuel vehicles for its light-duty vehicles by December 31, 2015 and to work to achieve the DOI optimal fleet inventory.

The VAM process outlined the DOI baseline fleet at **32,940 vehicles** [DOI's current vehicles on hand as of February 17, 2012]. The optimal fleet identified through the VAM process is **31,256.vehicles.** DOI will modify these goals in the FY13 VAM analysis. DOI will also incorporate the recommendations issues by the Office of Management and Budget and General Services Administration to accomplish these goals. DOI will look for ways to decrease the size and number of vehicles in the fleet and eliminate inefficient vehicles.

DOI plan to place Alternative Fuel Vehicle in proximity to Alternative Fuel stations

DOI has implemented measures to increase the use of alternative fuels. Although the infrastructure for alternative fuels is limited, DOI has and will continue to use alternative fuels wherever possible. Specifically, DOI has/ will implement strategies to increase alternative fuel use. As the Agency of the environment, DOI is dedicated to acquiring alternative fuel vehicles and promoting the use of alternative fuels. DOI will implement a plan to place alternative fuel vehicles in locations where the alternative fuel is available.

DOI has disseminated information to its bureaus regarding the locations for alternative fuel stations. DOI will redouble its efforts to partner with the department of Energy to use the fleet optimization tool and Fleet Dash to make more strategic placements for alternative fuel vehicles. DOI checks vehicle orders to ensure they meet GHG requirements, and place the most fuel-efficient vehicle. DOI also commits to:

- Update and implement the AFV acquisition plan annually, or as needed [On-going]
- Request additional funding to increase the infrastructure for alternative fueling stations at DOI fueling sites [On-going]

- Develop public and private partnerships to increase the availability and use of alternative fuel and fueling stations. [On-going]

Vehicle Sourcing Decisions

Due to the nature of DOI mission requirements, rugged terrain and remote locations, the DOI fleet has and continues to mainly consist of light and medium-duty trucks (approximately 82 percent). Approximately 9 percent of the DOI fleet are heavy-duty trucks over 16,000 lbs. Less than 9 percent of the DOI fleet consists of passenger sedans. DOI has passenger buses, used to transport school children and park/refuge/recreation site visitors. Due to these usages, DOI owns approximately 66 percent of its vehicles. Many vehicles DOI uses in its operations are more economical and available as owned vehicles rather than GSA-leased. GSA-leased vehicles play a vital role in the composition of the DOI fleet, when the right size and type vehicle are available. DOI bureau/offices conduct cost analysis prior to making purchase versus lease decisions. Vehicles are purchased from the most cost effective source. If there is a need for a commercial leased vehicle, it is only due to the vehicle, or a comparable substitute, not being provided by GSA Automotive or Fleet.

Incorporation of Fleet Plan into the Annual Strategic Sustainability Performance Plan (SSPP)

The DOI Fleet management plan was in the Strategic Sustainability Performance Plan in the June 2012 submission. The Plan did not address GSA recommendations as a result to the VAM analysis. The plan has been updated to reflect GSA's recommendation and the DOI implementation strategy to address these recommendations. DOI's fleet plan will be updated when necessary, but not less than annually.

DOI will continue to work to meet these requirements, and will continue to meet requirements outlined in statutes, regulations, and Presidential executive orders/memorandum. DOI is in the process of implementing GSA's VAM recommendations, developing a strategy to place AFVs in locations where the alternative fuel is available, reaching its optimal fleet inventory, and increasing efficiencies in the Departmental fleet.

Implementation of General Services Administration (GSA) Recommendations into the Fleet Management Plan

DOI received recommendations from GSA on methods to improve the DOI Fleet Management Plan and to increase DOI's efficiency and effectiveness using the VAM analysis. DOI pledges to implement the following GSA recommendation to improve its fleet management program:

- DOI will continue the practice of not exempting vehicles from the VAM analysis. DOI is dedicated to reduce the number of vehicles in the fleet and to eliminate inefficiencies in the operation of the fleet. DOI chose to include law enforcement and emergency response vehicles in the analysis to allow DOI to get a clearer picture into the practices of its motor vehicle fleet operation. This reduces the chances of operating an inefficient fleet.
- In order to reduce the fleet size beyond the 5 percent identified by the VAM analysis, DOI will seek further reductions in fleet size by:
    - Reductions in low utilized vehicles by either elimination or combined with other low utilized vehicles in vehicle sharing arrangements.
    - Increase the use of multi-passenger vehicle, such as Crew cab trucks and passenger vans, to eliminate single passenger vehicles operating in the same area.
    - Increase the use of Public transportation or shuttle buses.
    - DOI does not have assigned vehicles, with the exceptions of the Secretary and Deputy Secretary vehicles.
- Planned reductions in fleet size and petroleum consumption are coordinated with, and sufficient for, achieving the agency's scope 1 & 2 GHG reduction target by 2020.
- Increase the number of LSEV and AFV acquisitions to meet the requirement of the Presidential Memorandum.
    - The Office of the Secretary – Office of Acquisition and Property Management is tasked with the responsibility to oversee the implementation of the Fleet Management Plan and the VAM recommendations.
    - DOI is dedicated to achieving the goal of 100 percent AFV acquisitions in light-duty vehicles by the end of 2015.
        - DOI will mandate the increased acquisition of AFV for its bureaus.
    - DOI will significantly increase its efforts to acquire AFVs by working with its bureaus to develop acquisition plans, GSA to ensure the developed plans are executable, and the Department of Energy to place vehicles in locations where the alternative fuels are available.
- DOI will continue to identify and share areas where alternative fuels are available. DOI uses the DOE alternative fuel locator tool to place vehicles in areas where the fuels are available. In effort to increase this, DOI will -
    - Request an analysis from GSA and DOE to assist with placing DOI vehicles in locations where the fuels are available.
    - Increase the use of low-GHG vehicles in areas without alternative fuel.
- DOI will examine all agency-owned vehicles throughout the fleet to ensure that less costly vehicle sourcing is not feasible or available.

  - DOI will consider locations where short-term rental vehicles could replace agency-owned vehicle assets.
    - Short term vehicle needs, such as vehicles for seasonal workers, could be met with rental vehicles under a recent GSA policy change that permits rental up to 120 days.
- The DOI Financial and Business Management System (FBMS) is the Departmental centralized fleet management system. The Department and all of its Bureaus and Offices will be fully deployed on the FBMS SAP Fleet Management module in FY14.
  - Currently, 8 of the 9 Departmental Bureaus and Offices are deployed on the FBMS SAP system for fleet management.
- DOI will evaluate the use of vehicle sharing, on-demand service, or public transportation.
  - An evaluation of these options will be required in bureau fleet management plan submissions to the Department to be included in future submissions in the annual Strategic Sustainability Performance Plan

DOI will issue and track policy directives to ensure compliance with these recommendations. DOI will update its Fleet Management Plan in accordance with OMB and GSA guidance. It is anticipated that GSA will issue guidance for the FY13 VAM analysis and Fleet Management Plan submission due in February 2013. Any changes to policy and/or guidance from OMB/GSA will be included in the February 2013 VAM submission. DOI is dedicated to improve its fleet management program and welcome any assistance to help attain these requirements.

Appendix 3

Department of the Interior Addendum to the 2012 Strategic Sustainability Performance Plan: Responding to the President's Memorandum on Promotion of Biobased Markets

On February 21, 2012, President Obama signed a Memorandum, *Driving Innovation and Creating Jobs in Rural America through Biobased and Sustainable Product Procurement.* The memorandum requires all federal agencies to undertake a number of activities to increase their purchase of biobased products. The Department of the Interior is moving aggressively to implement the Presidential Memorandum requirements.

Accomplishments to date include:

- Live Webinar biobased training was offered in August to contracting personnel, charge card holders and program managers. Training is based on that offered at www.biopreferred.gov, while also emphasizing DOI specific opportunities to include biobased as well as a special emphasis on FPDS-NG and proper coding of element 8L. Similar biobased training is offered during each quarter of FY 2013.
- Including biobased clauses and requirements in all janitorial and construction contracts.

Baseline for Biobased Contracting:

The Department of the Interior found that 9% of the overall 5% of all contracts reviewed included requirements and clauses for biobased products during the first two quarters of FY 2012.

FY 2013 Target/Compliance Goal:

- The Department of the Interior will strive to increase by 50% from the baseline of 9% to a goal of 13.5% for all relevant acquisitions in the first two quarters of FY 2013.

Strategies for Improving Compliance:

The Department of the Interior strategy for improving compliance--full incorporation of requirements and clauses for biobased products in relevant and appropriate contracts and follow on activities to ensure compliance is achieved--includes the following elements:

- Department of the Interior will generate and disseminate agency level reports on biobased compliance using data from newly created biobased reporting elements in the Federal Procurement Data System–Next Generation.
- Biobased training is offered during each quarter of FY 2013. The live webinar biobased training will be offered to contracting personnel, charge card holders and program managers. Training is based on that offered at www.biopreferred.gov, while also emphasizing DOI specific opportunities to include biobased as well as a special emphasis on FPDS-NG and proper coding of element 8L.

Required Specification Reviews : The Department of the Interior is unaware of any agency specifications that the agency sets or has control of.

Department of the Interior

January 2012 OMB Scorecard on **Sustainability/Energy**

Scope 1&2 GHG Emission Reduction Target

For Scope 1&2 GHG Reduction Target of 20% by 2020:
6.5% reduction in 2011 and on track

Score: **GREEN**

Scope 3 GHG Emission Reduction Target

For Scope 3 GHG Reduction Target of 9% by 2020:
1.1% **increase** in 2011 and behind schedule

Score: **YELLOW**

Reduction in Energy Intensity

Reduction in energy intensity in goal-subject facilities compared with 2003:
22.8% and on track for 30% by 2015

Score: **GREEN**

Use of Renewable Energy

Use of renewable energy as a percent of facility electricity use:
Total of 10.1% from renewable electricity sources including at least 2.5% from new sources (thermal, mechanical, or electric)

Score: **GREEN**

Reduction in Potable Water Intensity

Reduction in potable water intensity compared with 2007:
11.2% and on track for 26% in 2020

Score: **GREEN**

Reduction in Fleet Petroleum Use

Reduction in fleet petroleum use compared to 2005:
14.0% and on track for 20% in 2015

Score: **GREEN**

Green Buildings

Sustainable green buildings:
0.96% of buildings sustainable
1.05% GSF of inventory sustainable

Score: **RED**

Standards for Success — *Red Standard, Yellow Standard, Green Standard*

Scope 1&2 GHG Emission Reduction Target

GREEN: Achieved its 2011 Sustainability Plan proposed reduction for GHG Scopes 1&2 and is on track to achieve its 2020 target.

YELLOW: Achieved at least half of its 2011 Sustainability Plan proposed target for GHG Scopes 1&2.

RED: Did not achieve at least half of its 2011 Sustainability Plan proposed target for GHG Scopes 1&2 or did not provide trajectory for 2020.

Scope 3 GHG Emission Reduction Target

GREEN: Achieved its 2011 Sustainability Plan proposed reduction for GHG Scope 3 and is on track to achieve its 2020 target.

YELLOW: Achieved at least half of its 2011 Sustainability Plan proposed target for GHG Scope 3.

RED: Did not achieve at least half of its Sustainability Plan proposed target for GHG Scope 3 or did not provide trajectory for FY 2020.

Reduction in Energy Intensity

GREEN: Reduced energy intensity (Btu/GSF*) in EISA goal-subject facilities by at least 18 percent compared with 2003 and is on track for 30 percent reduction by 2015.

YELLOW: Reduced energy intensity (Btu/GSF) in EISA goal-subject facilities by at least 15 percent compared with 2003.

RED: Did not reduce energy intensity (Btu/GSF) in EISA goal-subject facilities by at least 15 percent compared with 2003.

Use of Renewable Energy

GREEN: Uses at least 5 percent electricity from renewable sources as a percentage of facility electricity use & at least 2.5 percent of facility electricity use comes from new sources (post-1999). (Thermal and mechanical renewable can be included in the 2.5 percent new requirement, but not the 5 percent goal; i.e., an agency meets all new sources requirement with thermal or mechanical energy (2.5 percent) but would still need an additional 5 percent from renewable electricity sources.)

YELLOW: Uses at least 5 percent renewable energy from electric, thermal or mechanical sources to power facilities and equipment; but less than half was obtained from new sources (post-1999) or part of the requirement was met with thermal and mechanical renewable energy.

RED: Did not use at least 5 percent renewable energy from electric, thermal or mechanical sources to power facilities and equipment.

Reduction in Potable Water Intensity

GREEN: Reduced water intensity by at least 8 percent from final approved 2007 baseline and is on track for 26 percent reduction by 2020.

YELLOW: Reduced water intensity by at least 6 percent from final approved 2007 baseline.

RED: Did not reduce water intensity by at least 6 percent from final approved 2007 baseline.

Reduction in Fleet Petroleum Use

GREEN: Achieved a 12 percent reduction in petroleum use in its entire vehicle fleet compared to 2005 and is on track for 20 percent reduction by 2015.

YELLOW: Achieved at least 10 percent reduction in petroleum use in the entire vehicle fleet compared to 2005.

RED: Did not achieve at least 10 percent reduction in petroleum use in its entire vehicle fleet since 2005.

Green Buildings

GREEN: Demonstrates implementation of Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings (GP) for new, existing and leased buildings; and is on track to meet 15% goal by 2015 by reporting that at least 7% of buildings >5,000 GSF meet GP as reported in the Federal Real Property Profile (FRPP).

YELLOW: Incorporates Guiding Principles into all new design contracts for construction, major renovations and leases and at least 7 percent of GSF of its building inventory over 5,000 GSF meets GP as reported in FRPP.

RED: Cannot demonstrate compliance with GP on new construction, major renovations, or leases; and/or less than 7 percent of building inventory, either by number of buildings or GSF, over 5,000 GSF meets GP as reported in FRPP.

**GSF = Gross Square Footage*

Enclosure 3

THE SECRETARY OF THE INTERIOR

WASHINGTON

ORDER NO. 3289

Subject: Addressing the Impacts of Climate Change on America's Water, Land, and Other Natural and Cultural Resources

Sec. 1 **Purpose and Background.** Secretarial Order No. 3285, issued on March 11, 2009, made production and transmission of renewable energy on public lands a priority for the Department. This Order establishes a Department-wide approach for applying scientific tools to increase understanding of climate change and to coordinate an effective response to its impacts on tribes and on the land, water, ocean, fish and wildlife, and cultural heritage resources that the Department manages. This Order replaces Secretarial Order No. 3226, Amendment No. 1, issued on January 16, 2009, and reinstates the provisions of Secretarial Order No. 3226, issued on January 19, 2001.

To fulfill our nation's vision for a clean energy economy, Interior is now managing America's public lands and oceans not just for balanced oil, natural gas, and coal development, but also – for the first time ever – to promote environmentally responsible renewable energy development. Sun, wind, biomass, and geothermal energy from our public and tribal lands is creating new jobs and will power millions of American homes and electric vehicles.

The Department is also taking the lead in protecting our country's water, land, fish and wildlife, and cultural heritage and tribal lands and resources from the dramatic effects of climate change that are already occurring – from the Arctic to the Everglades. The realities of climate change require us to change how we manage the land, water, fish and wildlife, and cultural heritage and tribal lands and resources we oversee. For example:

- New water management imperatives associated with climate change may require restoration of natural systems and construction of new infrastructure to reduce new flood risks or to capture early run-off.
- Strategies to address sea level rise may require acquisition of upland habitat and creation of wetlands and other natural filters and barriers to protect against sea level rise and storm surges. It may be necessary to relocate certain iconic and culturally historic structures.
- Shifting wildlife and habitat populations may require investments in new wildlife corridors.
- New invasions of exotic species and new wildland fire threats due to longer fire seasons and more severe droughts will require innovation and more effective ways of managing the Department's resources.

The Department of the Interior, with its 67,000 employees and scientific and resource management expertise, is responsible for helping protect the nation from the impacts of climate change. In particular the Department must:

- Adapt its water management strategies to address the possibility of shrinking water supplies and more frequent and extended droughts to continue to supply drinking water to more than 31 million people and irrigation water to 140,000 farmers.
- Wisely manage millions of acres of parks, refuges and other public lands, and prudently exercise its shared responsibility for managing the 1.7 billion acres of the U.S. outer continental shelf.
- Conserve and manage fish and wildlife resources, including over 800 native migratory bird species and nearly 2,000 federally listed threatened and endangered species.
- Protect cultural and archaeological resources and iconic structures that may be affected by climate change.
- Address the impacts of climate change on American Indians and Alaska Natives, for whom the Department holds trust responsibilities on behalf of the Federal government.
- Continue to provide state-of-the art science to better understand the impacts of climate change and to develop science-based adaptive management strategies for natural and cultural resource managers.
- Continue its work to quantify the amount of carbon stored in our forests, wetlands, and grasslands, identifying areas where carbon dioxide can be safely stored underground, and ways to reduce the Department's carbon footprint.

Sec. 2 **Authority**. This Order is issued under the authority of Section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262), as amended.

Sec. 3 **Coordinating the Department's Response to Climate Change Impacts on Our Resources**. This Order establishes a *Climate Change Response Council* within the Office of the Secretary that will execute a coordinated Department-wide strategy to increase scientific understanding of and development of effective adaptive management tools to address the impacts of climate change on our natural and cultural resources. The Climate Change Response Council will be composed of the Secretary (Chair), Deputy Secretary (Vice-Chair), Counselor to the Secretary (Vice-Chair), Assistant Secretaries, Bureau Directors and the Solicitor. The Council will help coordinate activities within and among the Department's agencies and bureaus to develop and implement an integrated strategy for responding to climate change impacts involving the resources managed by the Department. The Department's Climate Change Response Council will also coordinate its climate change activities with all relevant Federal Departments and agencies including, but not limited to, the Council on Environmental Quality, the Office of Energy and Climate Change, the Office of Science and Technology Policy, the National Science and Technology Council, the Department of Agriculture, the Department of Commerce, the Department of Defense, and the Environmental Protection Agency.

The Climate Change Response Council will implement Department-specific climate change activities through the following mechanisms:

(a) Climate Change Response Planning Requirements. Each bureau and office of the Department must consider and analyze potential climate change impacts when undertaking long-

range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview. These requirements were set forth in Secretarial Order No. 3226, and remain in effect. The organizational changes made by this Order will enable the bureaus and agencies to fulfill these planning requirements.

(b) DOI Regional Climate Change Response Centers. Management decisions made in response to climate change impacts must be informed by science and require that scientists work in tandem with those managers who are confronting climate change impacts and evaluating options to respond to such impacts. Pursuant to P.L. 110-161, the United States Geological Survey (USGS) has been developing regional science centers to provide climate change impact data and analysis geared to the needs of fish and wildlife managers as they develop adaptation strategies in response to climate change. These centers are currently known as "regional hubs" of the National Climate Change and Wildlife Science Center, and are being developed in close collaboration with Interior agencies and other federal, state, university, and non-governmental partners.

The Climate Change Response Council will work with USGS and other Department bureaus to rename these regional science centers as Regional Climate Change Response Centers and broaden their mandate to encompass other climate-change-related impacts on Departmental resources. These eight Response Centers will synthesize and integrate climate change impact data and develop tools that the Department's managers and partners can use when managing the Department's land, water, fish and wildlife, and cultural heritage resources.

(c) Landscape Conservation Cooperatives. Given the broad impacts of climate change, management responses to such impacts must be coordinated on a landscape-level basis. For example, wildlife migration and related needs for new wildlife corridors, the spread of invasive species and wildfire risks, typically will extend beyond the borders of National Wildlife Refuges, BLM lands, or National Parks. Additionally, some bureau responsibilities (e.g., Fish and Wildlife Service migratory bird and threatened and endangered species responsibilities) extend nationally and globally. Because of the unprecedented scope of affected landscapes, Interior bureaus and agencies must work together, and with other federal, state, tribal and local governments, and private landowner partners, to develop landscape-level strategies for understanding and responding to climate change impacts. Interior bureaus and agencies, guided by the Climate Response Council, will work to stimulate the development of a network of collaborative "Landscape Conservation Cooperatives." These cooperatives, which already have been formed in some regions, will work interactively with the relevant DOI Regional Climate Change Response Center(s) and help coordinate adaptation efforts in the region.

Sec. 4 **Additional Departmental Action to Mitigate Climate Change.** In accordance with Secretarial Order No. 3285, the Department has prioritized development of renewable energy on public lands and offshore waters to reduce our dependence on foreign oil and to reduce greenhouse gas pollution. This Order establishes two additional projects to mitigate climate change: the DOI Carbon Storage Project, and the DOI Carbon Footprint Project. Additional mitigation projects will be encouraged and supported by the Climate Change Response Council.

(a) The DOI Carbon Storage Project. This project is being implemented under P.L. 110-140, "The Energy Independence and Security Act of 2007," which gives the Department statutory responsibility to develop carbon sequestration methodologies for geological (i.e., underground) and biological (e.g., forests and rangelands) carbon storage. The USGS has the lead in administering the Carbon Storage Project, but will work closely with other bureaus and agencies in the Department and external partners to enhance carbon storage in geologic formations and in plants and soils in a manner consistent with the Department's responsibility to provide comprehensive, long-term stewardship of its resources. The DOI Carbon Storage Project is vital for successful domestic and global geological and biological carbon sequestration efforts.

(b) The DOI Carbon Footprint Project. The project will develop a unified greenhouse gas emission reduction program, including setting a baseline and reduction goal for the Department's greenhouse gas emissions and energy use. The Assistant Secretary for Policy, Management and Budget will have the lead in administering the DOI Carbon Footprint Project, with the cooperation of all of the Department's agencies and bureaus.

Sec. 5 **American Indians and Alaska Natives**. Climate change may disproportionately affect tribes and their lands because they are heavily dependent on their natural resources for economic and cultural identity. As the Department has the primary trust responsibility for the Federal government for American Indians, Alaska Natives, and tribal lands and resources, the Department will ensure consistent and in-depth government-to-government consultation with tribes and Alaska Natives on the Department's climate change initiatives. Tribal values are critical to determining what is to be protected, why, and how to protect the interests of their communities. The Department will support the use of the best available science, including traditional ecological knowledge, in formulating policy pertaining to climate change. The Department will also support substantive participation by tribes in deliberations on climate-related mechanisms, agreements, rules, and regulations.

Sec. 6 **Implementation**. The Deputy Secretary is responsible for ensuring implementation of all aspects of this Order. This responsibility may be delegated as appropriate. This Order does not alter or affect any existing duty or authority of individual bureaus.

Sec. 7 **Effective Date**. This Order is effective immediately and will remain in effect until its provisions are converted to the Departmental Manual or until it is amended, superseded, or revoked, whichever occurs first.

Ken Salazar
Secretary of the Interior

Date: SEP 14 2009

United States Department of the Interior
Office of Inspector General

November 4, 2008

Memorandum

To: Debra E. Sonderman
Director, Office of Acquisition and Property Management

From: Earl E. Devaney
Inspector General

Subject: Department of the Interior (DOI) Fuels Consumption Data is Incorrectly Reported (C-IS-MOI-0008-2008)

The Office of Inspector General (OIG) initiated an inspection to determine whether DOI is meeting specific requirements of Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management." Using a base year of FY 2005, this Order requires agencies to decrease consumption of petroleum-based fuels by 2 percent annually, and to increase consumption of alternative fuels by 10 percent annually.

We terminated our inspection because we found both petroleum-based and alternative fuel consumption figures to be significantly flawed. DOI reported a 6 percent decrease in the consumption of petroleum-based fuels from FY 2005 to FY 2007. We determined, however, that DOI misreported its fuel consumption due to errors with bureaus' fuel data. Based on corrections of known errors, we estimate that DOI may have ***increased*** its consumption by as much as 22 percent for that period. Poor data quality also calls into question DOI's reported 58 percent increase in alternative fuel consumption.

This report contains two recommendations that, if implemented, should correct reporting errors in the FY 2005 baseline and more accurately reflect DOI fuel consumption performance when reported to the U.S. Congress and the Department of Energy.

We would appreciate being kept apprised of the actions DOI takes on our recommendations as we will track the status of their implementation. Please provide a written response to our office within 30 days that identifies plans to address the findings and recommendations cited in this report.

United States Department of the Interior
Office of Inspector General

November 2008

INSPECTION REPORT
C-IS-MOI-0008-2008

Executive Order 13423

Section 2, paragraph (g) of this Order requires federal agencies to —

- ***Decrease*** petroleum fuel consumption by 2% annually.
- ***Increase*** fleet alternative fuel consumption by 10% annually.

All DOI bureaus that operate a fleet of 20 vehicles or more must meet Executive Order 13423 fuel consumption requirements. Fuel consumption for all light, medium, and heavy duty vehicles must be reported — except those designated for law enforcement and emergency purposes.

DOI Fuels Consumption Data is Incorrectly Reported

In response to the requirements of Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management," the Department of the Interior (DOI) has reported its fuel consumption performance to the Department of Energy (DOE) for FY 2005 through FY 2007. The Office of Inspector General (OIG) took the opportunity to assess DOI fuel consumption data for its bureaus' fleets.

DOI reports that it has exceeded both its petroleum fuel reduction requirements and its goal of increasing alternative fuel consumption. However, we determined that DOI misreported fuel consumption due to errors in the bureaus' fuel data. In terms of petroleum-based fuels, we estimate that DOI may have actually ***increased*** its consumption by as much as 22 percent from FY 2005 to FY 2007. Poor data quality also calls into question the reported 58 percent increase in alternative fuel consumption. As a result, we were unable to determine whether DOI is meeting the fuel consumption requirements of Executive Order 13423 and terminated our inspection.

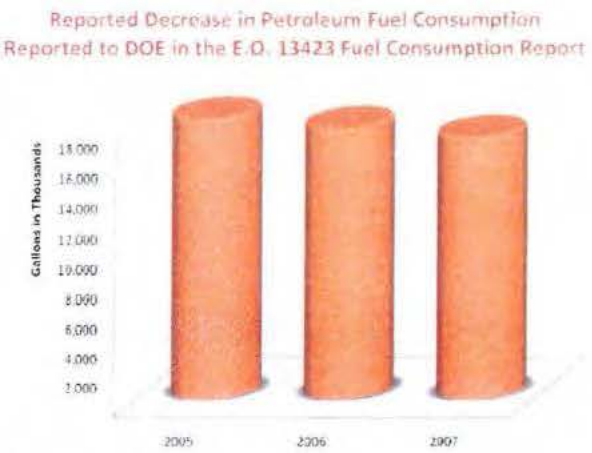
National Park Service (NPS)	Bureau of Indian Affairs (BIA)	Fish and Wildlife Service (FWS)	Bureau of Land Management (BLM)	United States Geological Survey (USGS)	Bureau of Reclamation (BOR)	Office of Surface Mining (OSM)	Minerals Management Service (MMS)
10,693 Vehicles	**7,608 Vehicles**	**7,261 Vehicles**	**5,497 Vehicles**	**4,460 Vehicles**	**1,961 Vehicles**	**150 Vehicles**	**40 Vehicles**

The bureaus are required to comply with Executive Order 13423 due to their fleet sizes

Petroleum Fuel Consumption

***Petroleum-based Fuel Consumption** is the amount of gasoline and diesel fuel used by a fleet.*

Executive Order 13423 requires federal agencies to decrease petroleum fuel consumption by 2 percent annually from a FY 2005 baseline. In its report to DOE, DOI states that it reduced petroleum-based fuels consumption by 3 percent in both FYs 2006 and 2007 and reports reductions in petroleum fuels of approximately 1.3 million gallons over the 2-year period. In fact, we estimate that DOI may have ***increased*** petroleum fuel consumption by as much as 22 percent from FY 2005 to FY 2007.



OIG Analysis

This Office initially performed a limited assessment of all DOI bureaus' transportation management.

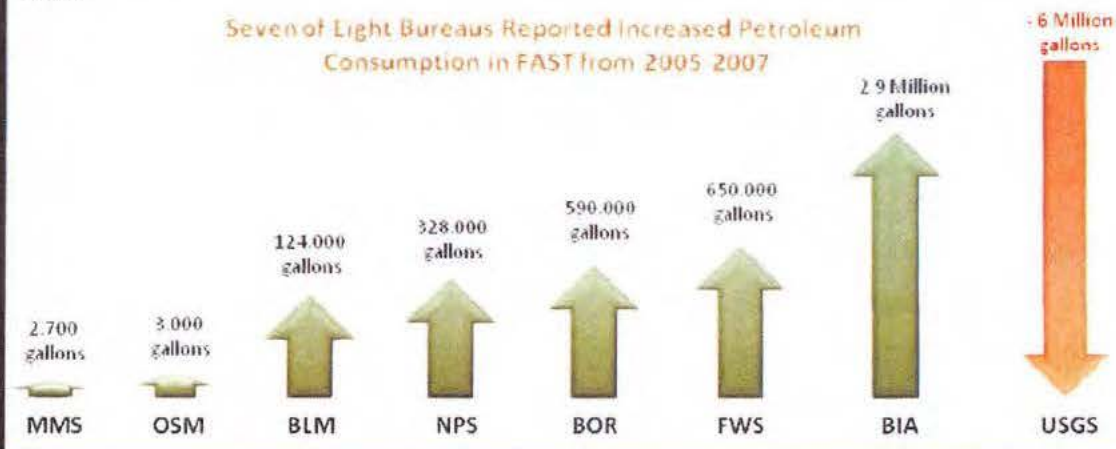
We then conducted an in-depth analysis of the fuel consumption data in the Federal Automotive Statistical Tool (FAST) for BIA, BOR, FWS, NPS, and USGS.

These bureaus had the bigger fleets and larger reported fuel consumptions.

Seven of Eight DOI Bureaus Report Petroleum Consumption Increases

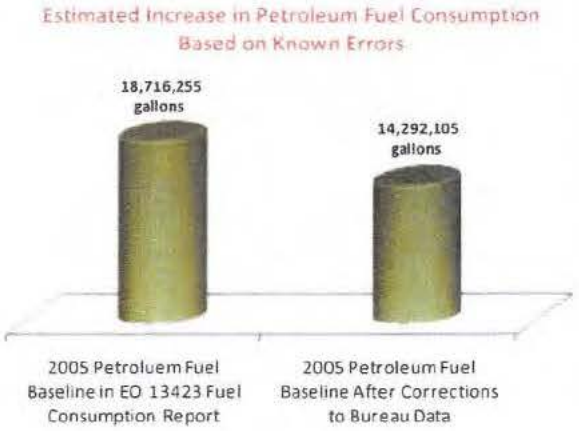
DOI's bureau fleet managers report their fuel consumption into the Federal Automotive Statistical Tool (FAST), a compliance reporting database managed by DOE. Interestingly, seven of DOI's eight bureaus' input increases in petroleum consumption from FY 2005 to FY 2007; these range from 2,700 gallons for Minerals Management Service (MMS) to 2.9 million gallons for Bureau of Indian Affairs (BIA).

Only the U.S. Geological Survey (USGS) reported a decrease — 6 million gallons, which more than offset the other bureaus' increases. The result is the overall reported decrease in petroleum consumption. We found, however, that USGS misreported its petroleum consumption and that other bureaus' data contained errors, as well.



2005 Baseline Needs to be Adjusted

USGS, BOR, and the U.S. Fish and Wildlife Service (FWS) all submitted flawed data that affected the FY 2005 baseline. If the errors we identified were to be corrected in FAST, we estimate the baseline would be reduced from the reported 18.7 million gallons of petroleum consumed to 14.3 million gallons.



DOI told us both USGS and FWS reported revised baseline petroleum fuel data that would have reduced the 2005 baseline, however the numbers were never formally changed in FAST nor in any reporting to DOE.

Federal Automotive Statistical Tool

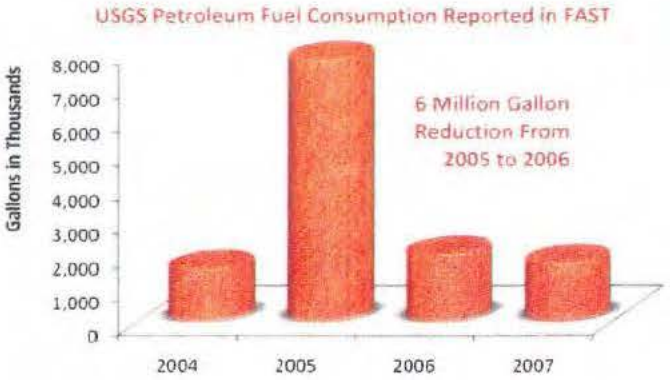
Federal agencies report their fuel use in FAST, a compliance reporting database administered by DOE.

DOE then provides a comprehensive report addressing the requirements of EO 13423 to the Congress, each year.

Bureaus Did Not Identify or Correct Obvious Data Errors

USGS

In FAST, USGS reports 7.7 million gallons of petroleum fuel used in the FY 2005 baseline. Given that the consumption amounts reported in FYs 2004, 2006, and 2007 are all less than 2 million gallons, we concluded that the reported fuel consumption for FY 2005 is inaccurate. According to USGS, DOI managers are aware of this error but have not made a correction.



Neither DOI nor USGS were able to provide the actual consumption figure for FY 2005. Therefore, we used 1.8 million gallons in our estimate of the petroleum fuel consumption for FY 2005, the average consumption for FYs 2004 and 2006.

BOR Petroleum Fuel Consumption

This Bureau underreported its FY 2005 petroleum consumption by 600,469 gallons in FAST.

The System's data validation report then alerted DOI and BOR of the mistake.

Neither BOR nor DOI has done anything, however, to correct the error.

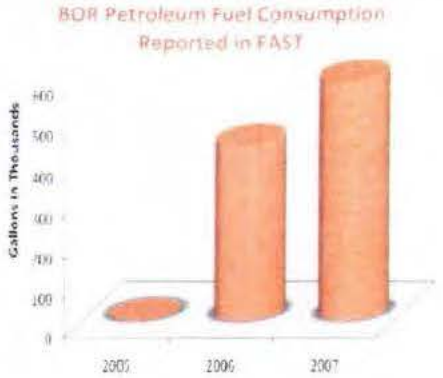
FWS

Fleet managers stated they have very little faith in reported data.

BOR

BOR submitted the following petroleum-based fuel consumption data in gallons by fiscal year for inclusion in FAST:

2005	972
2006	432,948
2007	590,703



When we spoke with BOR representatives, they were able to provide documentation that shows FY 2005 BOR petroleum-based fuel consumption was actually 601,441 gallons. Therefore, BOR under-reported its petroleum consumption by 600,469 gallons in FY 2005. We contacted both BOR and DOI managers to see if they know about the inconsistency apparent in the FY 2005 data. No one was aware of the under-reported amount before we pointed it out.

FWS

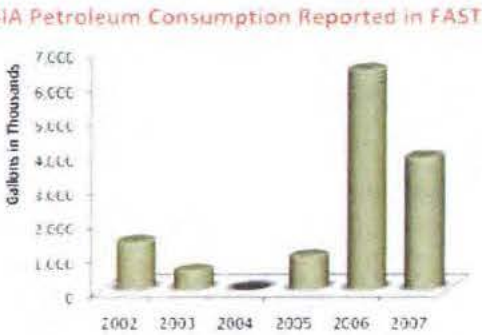
In FY 2007, FWS reviewed its reported data in FAST and concluded that it had understated its FY 2005 petroleum-based fuel consumption by 578,000 gallons. In a memorandum to DOI, FWS identifies the mistake and states that correcting the error would increase fuel consumption for FY 2005. When we contacted DOI representatives about the revision, they told us that they had not received the FWS information in time to include it in the adjusted petroleum baseline.

Another Anomaly

BIA

BIA submitted the following petroleum-based fuel consumption data in gallons by fiscal year for inclusion in FAST:

2002	1,394,331
2003	568,113
2004	0
2005	980,859
2006	6,435,356
2007	3,875,370

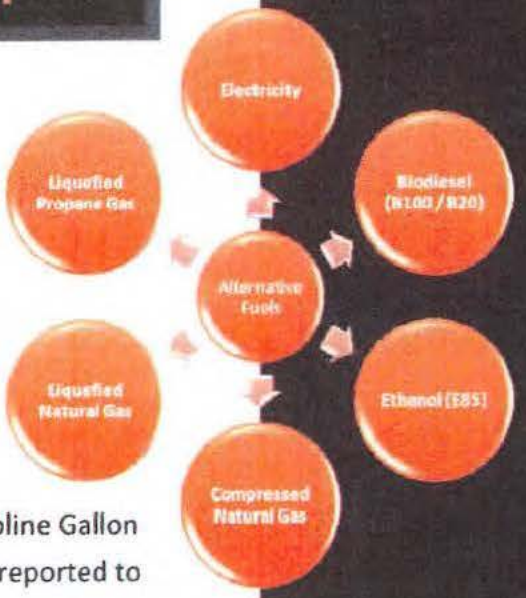


Given the range of numbers reported from FY 2002 through FY 2007, it is impossible to determine if BIA over-reported or under-reported fuel consumption data. According

to BIA, the FAST System contains the best data available for its fuel consumption. If BIA's data is incorrect, an adjustment would clearly affect DOI's overall consumption numbers. However, we were unable to determine what the effect would be because the data was so flawed.

Alternative Fuel Consumption

Executive Order 13423 requires federal agencies to increase alternative fuel consumption by 10 percent annually. The increase is measured relative to the prior year's alternative fuel consumption levels.



DOI reported that it did not meet its alternative fuel consumption goal in FY 2006. However, in FY 2007, DOI reported a 58 percent increase in alternative fuel consumption from FY 2005. This reported alternative fuel consumption data also appears flawed.

For example, the data in FAST shows approximately 1.2 million Gasoline Gallon Equivalents (GGEs) of alternative fuel consumed while the quantity reported to DOE was significantly less at 400,000 GGEs.

DOI stated in a December 10, 2007 e-mail to DOE that the reported GGEs in FAST were incorrect and requested that DOE allow a significant adjustment to its FY 2005 alternative fuel figures, thus reducing reported consumption by 800,000 GGEs. DOE accepted the 800,000 GGE reduction as reasonable based on prior year trends. However, DOI did not provide documentation to support this adjustment.

Although we agree that the FAST data appears incorrect, we cannot conclude that the adjusted figures are a more accurate reflection of DOI alternative fuel consumption.

Alternative Fuel Consumption Reported to DOE in the E.O. 13423 Fuel Consumption Report

Gasoline Gallon Equivalents

Alternative fuels such as liquid propane gas, electricity, ethanol, and biodiesel are reported in GGEs.

For purpose of comparison to traditional fuel gallons, a different formula is used to convert the amounts of each fuel.

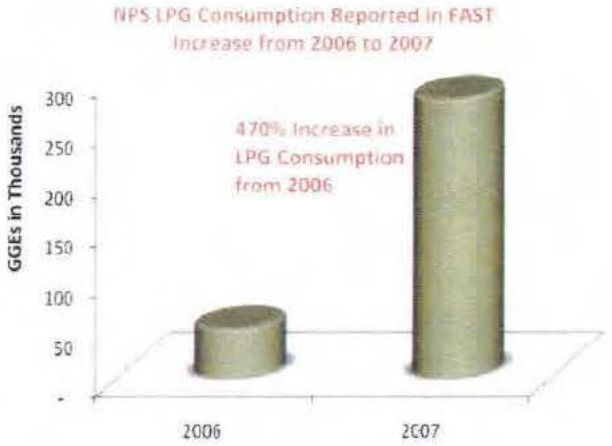
Alternative Fuel Anomalies Have Been Reported in FAST

We reviewed the bureaus' alternative fuel data in FAST and found significant anomalies in the NPS, BIA, and BOR data. Excessive and unrealistic percentage increases in alternative fuel consumption led us to believe that input errors in FAST are as prevalent for alternative fuels as they are for petroleum-based fuels.

Reliability of FAST Data Questioned

According to fleet managers at one bureau, the figures [in FAST] were "so outlandish, we couldn't believe it."

For example, NPS reported approximately 49,000 GGEs of liquid propane gas (LPG) consumed in FY 2006. In FY 2007, it reported 279,000 GGEs of LPG, which represents a 470 percent increase from the prior year. When we reviewed NPS FAST data for the number of vehicles and corresponding mileage, we could not identify a reasonable explanation for such a large increase from FY 2006 to FY 2007.



We also noted questionable trends associated with BIA- and BOR-reported alternative fuel data. For example, BOR reports that it increased alternative fuel consumption from 28 GGEs in FY 2005 to 4,263 GGEs in FY 2007, a 15,000 percent increase. In the case of BIA, the Bureau reports a 5,000 percent increase in alternative fuel consumption from FY 2005 to FY 2007, increasing reported consumption from 1,769 GGEs to 88,481 GGEs.

In addition , it appears that BIA has misreported the types of alternative fuels consumed. For example, nearly all of BIA's alternative fuel consumption (1,680 of 1,769 GGEs) in FY 2005 came from biodiesel. However, BIA reported no biodiesel fuel for FY 2007. In addition, nearly all of BIA's alternative fuel usage in FY 2007 (85,927 of 88,481 GGEs) came from E-85 ethanol (a mixture of 85 percent ethanol and 15 percent gasoline), though BIA reported no E-85 ethanol consumption for FY 2005.

We recognize that volumes for these two bureaus are small and that small increases in consumption can result in large percentage increases. We also recognize that due to the small numbers for FYs 2005-2007, it is possible that the increases may be accurate, and bureaus may be using significantly more alternative fuel. At a minimum, however, data accuracy must be determined.

Recommendations

Because of the number and significance of the errors we found, we recommend DOI:

⇒ Ensure bureau fleet managers perform an in-depth review of the FY 2005 FAST data for each bureau to ensure it is as accurate and reasonable as possible.

⇒ Request DOE make adjustments in the FAST System based on the results of the detailed analysis.

At this time, we do not believe DOI should review and adjust fuel consumption data for FYs 2006 or 2007. Although we did find some errors in FYs 2006 and 2007 data, we suggest DOI and its bureaus conserve their limited resources and concentrate their efforts on the FY 2005 baseline and data being reported for FY 2008 and beyond.

Scope and Methodology

We conducted our inspection to determine if DOI and its bureaus are meeting the fuel consumption requirements of Executive Order 13423.

We concentrated on petroleum-based and alternative fuel consumption data reported in the FAST System from FY 2005 through FY 2007. In the cases of BIA and USGS petroleum-based fuel consumption, we reviewed additional data (FYs 2002-2004) to get a better idea of how much fuel the two bureaus consumed over time.

We conducted limited tests of the FAST data to identify misreported consumption. It is likely that our limited procedures did not uncover all errors in the consumption data.

DOI reported no plug-in hybrid vehicles because they are not yet commercially available at a reasonable cost. According to DOE, the auto industry has plug-in hybrids under development, and they are hopeful the vehicles will become commercially available by 2010.

***Significant Errors** in reported data for multiple bureaus preclude any reasonable assurance that DOI is meeting fuel consumption requirements.*

Consequently, the OIG was unable to determine the fuel performance DOI should be reporting to DOE and, ultimately, the U. S. Congress.

Report Fraud, Waste, and Mismanagement

Fraud, waste, and mismanagement in Government concerns everyone: Office of Inspector General staff, Departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to Departmental or Insular area programs and operations. You can report allegations to us in several ways.

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By Fax:	703-487-5402

Revised 07/07

EVALUATION

OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

NATIONAL PARK SERVICE: CLIMATE FRIENDLY PARKS INITIATIVE

Report No.: HI-EV-NPS-0001-2010

August 2011

OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

AUG 12 2011

Memorandum

To: Jonathan B. Jarvis
Director, National Park Service

From: Mary L. Kendall
Acting Inspector General

Subject: Evaluation — National Park Service: Climate Friendly Parks Initiative
Report No. HI-EV-NPS-0001-2010

This report presents the results of our evaluation of the National Park Service's (NPS) Climate Friendly Parks initiative (CFP). We initiated this evaluation to determine whether CFP member parks benefit from participation in this initiative and, if so, to identify further benefits that may be derived through enhancements to the CFP design. In light of recent Federal mandates, we modified our objective to determine how CFP could help meet new greenhouse gas emission reporting requirements as set forth in Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance."

We commend NPS and the Pacific West Region for empowering field staff to record and reduce greenhouse gas emissions long before the existence of a Federal mandate. We are concerned, however, that NPS progress under the voluntary initiative may not easily transfer to the recent Federal and Departmental Strategic Sustainability Performance Plan reporting requirements. As plans develop to use CFP components to meet recent Federal mandates, NPS will need to address accountability, data quality and assurance, and program sustainability to ensure success of the program.

To address these concerns and assist NPS in using its CFP to meet recent Federal mandates, we made four recommendations. Based on your July 13, 2011 response to the draft report, we consider all four recommendations to be resolved but not implemented. We will refer these recommendations to the Office of Policy, Management and Budget to track implementation.

The legislation, as amended, creating the Office of Inspector General requires that we report to Congress semiannually on all audit reports issues, actions taken to implement our recommendations, and recommendations that have not been implemented.

We appreciate the cooperation shown by the NPS and the Pacific West Region during our evaluation. A response to this report is not required. If you have any questions regarding this memorandum or the subject report, please do not hesitate to contact me at 202-208-5745.

Table of Contents

Results in Brief

We evaluated the National Park Service's (NPS or Service) Climate Friendly Parks initiative (CFP) to determine whether CFP member parks benefit from participation and, if so, to identify further benefits that may be derived through enhancements to CFP design.

NPS, particularly the Pacific West Region (PWR), has empowered field staff to help reduce greenhouse gas emissions. These efforts, which began long before any Federal mandate, should help the Service lead compliance with Executive Order (EO) 13514, "Federal Leadership in Environmental, Energy, and Economic Performance," and DOI's Strategic Sustainability Performance Plan implementation. We are concerned, however, that the progress made under the voluntary CFP may not easily transfer to the newly mandated reporting requirements due to deficiencies in accountability, data quality and assurance, and program sustainability.

We found that accountability ends once a park develops an action plan and becomes a CFP member park. A standard mechanism does not exist to measure, track, and report a park's progress and outcome, or analyze which actions have been most beneficial. Moreover, the current greenhouse gas inventory tool used to identify activities that produce emissions and the amount of each activity's emissions does not meet EO requirements. In addition, data quality is at risk due to the manner in which greenhouse gas inventory data are collected, verified or validated, and updated at CFP member parks. The numbers therefore cannot be relied upon to provide the accurate reporting information required by the newly issued Council on Environmental Quality (CEQ) guidance. Finally, we identified two areas that could help CFP achieve sustainability: integration options and a clear long-term plan. In the midst of programmatic growth and recent Federal mandates, the CFP lacks a clear long-term plan to help it play a more viable role in the Service.

Our recommendations, if implemented, should improve accountability, data quality and assurance, and sustainability of the CFP in a manner consistent with a changing Federal environment and new mandates.

Introduction

Objective

We evaluated the National Park Service's (NPS or Service) Climate Friendly Parks initiative (CFP) to determine whether CFP member parks benefit from participation and, if so, to identify further benefits that may be derived through enhancements to the CFP design. In light of recent Federal mandates, we modified our objective to include a determination of how CFP could help NPS meet the new greenhouse gas emission reporting requirements set forth in Executive Order (EO) 13514, "Federal Leadership in Environmental, Energy, and Economic Performance."

Background

NPS preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The Service cooperates with partners to extend the benefits of conservation and outdoor recreation throughout the United States and the world.

Due to the effects of climate change, NPS faces a challenge to maintain the natural and cultural resources of the national parks. In keeping with its mission and recognizing its significant potential to educate visitors and staff on the impacts of climate change, NPS collaborated with the U.S. Environmental Protection Agency (EPA) in 2002 to establish CFP. CFP provides resources and support for parks to measure and reduce greenhouse gas emissions, to plan ways to adapt to a changing climate, and to educate the public about climate change. Participation is voluntary and aims to inspire park staff, partners, and the millions of people who visit the national parks each year. Upon completing a baseline greenhouse gas inventory, attending a workshop, and developing an action plan, a park becomes a member of the Climate Friendly Parks network. (See figure 2)

CFP has helped to empower park employees from various park units and divisions to work together innovatively, share ideas, and serve as role models in climate stewardship. Currently, there are 24 member parks and another 40 or more are completing the process. The Pacific West Region (PWR) is the most active, as a former regional director set a goal to have all PWR parks become CFP members by 2010.

From 2004 to 2009, EPA and NPS worked collaboratively to implement CFP under an interagency agreement. Over time, the direct costs of the program amounted to about $1.5 million, primarily funded by EPA to develop a greenhouse gas emissions inventory tool and to provide workshops and technical assistance. The initiative expanded to involve not only park personnel but a number of non-governmental partners and stakeholders. The agreement expired in mid-2009, at which time NPS took full control of CFP.

Because NPS no longer received EPA funds to support CFP, they had to rely on provisional funding from the Service's Environmental Compliance and Response Branch (ECRB)[1] and some assistance from PWR. As a result, a new blanket purchase agreement for $250,000 was awarded to a consultant, allowing CFP organizers to continue offering technical support for workshops, trainings, and baseline emissions inventories for member parks.

On October 5, 2009, the President signed EO 13514, "Federal Leadership in Environmental, Energy, and Economic Performance." The EO establishes sustainability goals for Federal agencies and focuses on improving their environmental, energy, and economic performance. Under the new EO, Federal agency efforts and outcomes achieved in implementing this order meet a number of energy, water, and waste reduction targets:

- 30 percent reduction in vehicle fleet petroleum use by 2020,
- 26 percent improvement in water efficiency by 2020,
- 50 percent recycling and waste diversion by 2015,
- 95 percent of all new applicable contracts for products and services meet sustainability requirements, and
- Implementation of the 2030 "net-zero-energy" building requirement.

Further, the new EO requires agencies to continue implementing an environmental management system (EMS) at all appropriate organizational levels. Starting in 2011, agencies are also required to set baseline emission inventories and greenhouse gas reduction goals. They must institute a framework for annual reporting and accountability regarding each agency's sustainability performance. Under the new guidelines, agencies are required to "measure, report, and reduce their greenhouse gas emissions from direct and indirect activities." (See Figure 1.) In June 2010, DOI implemented a department-level EMS to manage and track progress on achieving the environmental and energy performance goals of EO 13514 and EO 13423.[2]

[1] The National Parks Service's ECRB was originally the Environmental Management Program Office but was reorganized in 2009 into two branches: ECRB and the Sustainable Operations and Climate Change (SOCC) Branch. The SOCC Branch is where CFP is being managed.
[2] U.S. Department of the Interior, Strategic Sustainability Performance Plan, June 2, 2010

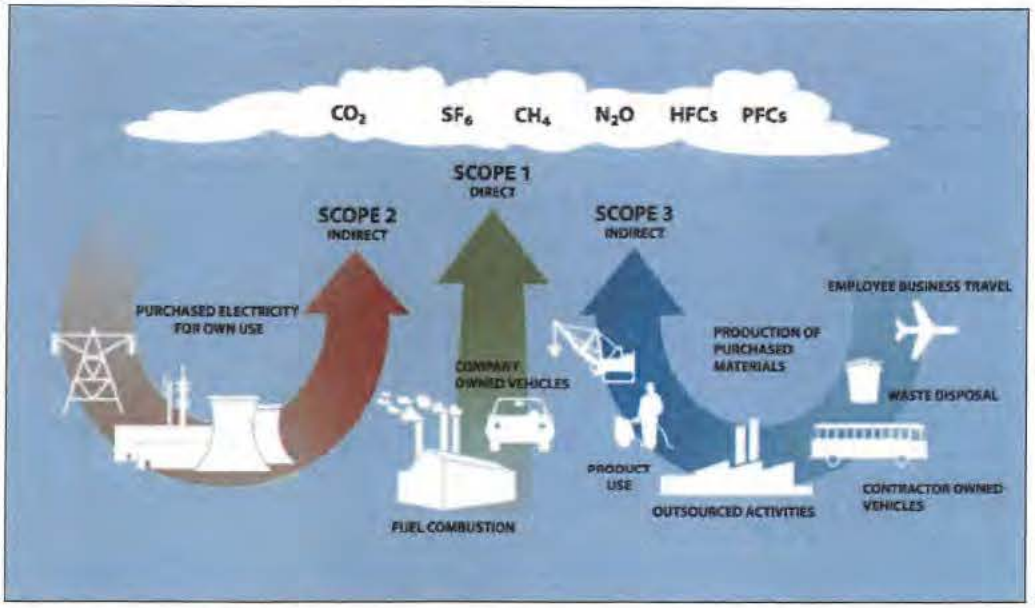

Figure 1. Sources of Scopes 1, 2, and 3 for greenhouse gas. The visual representation above is as follows: Scope 1 includes emissions from sources that are owned or controlled by the Government and Scope 2 includes emissions resulting from energy purchased by Federal agencies. Scope 3 includes emissions from sources not owned or directly controlled by a Federal agency but that relate to agency operations such as delivery services, employee travel, and commuting. Source of figure: Greenhouse Gas Protocol Corporate Standard.

According to a CFP official, the demand for CFP-related resources increased, due in part to EO 13514; the issuance of Secretarial Order 3289, "Addressing the Impacts of Climate Change on America's Water, Land, and Other Natural and Cultural Resources;" and the Director's message encouraging parks to get involved in climate change mitigation and education initiatives. As a result, CFP officials allocated an additional $25,000 to expand the tasks in the blanket purchase agreement to address the need for increased outreach and education efforts, technical research, and policy support. As of July 2010, NPS had plans underway to secure another task order, but did not know what the funding would be in subsequent years.

CFP member parks do not get additional base funding or financial incentives for participating in the network. Identifying funding to pay for CFP-related projects and the extra time to devote to the related activities add challenges that member parks must face. Due to geographic locations and park unit sizes, staff and resources available to devote to CFP fluctuate, potentially limiting interest and full participation. Park staff interviewed at Hawaii Volcanoes National Park expressed enthusiasm for their involvement in the CFP even though their voluntary participation created collateral duties, requiring extra time and responsibilities. This notion was also acknowledged in the Department's 2010 Strategic Sustainability and Performance Plan, which states that "many greening responsibilities are designated as collateral functions of staff already stretched to

meet critical mission needs." One alternative to address this problem has been to enlist interns to help parks gather data to perform greenhouse gas inventories and provide support as needed. PWR has had success with this method.

NPS has recently developed a comprehensive strategy for sustainable management, called the Green Parks Plan, to fulfill the EO and other agency directives. Currently in draft, the Green Parks Plan sets ambitious goals for greenhouse gas reduction and calls for all parks to enter the CFP network. We were told that CFP will not be a stand-alone program in NPS, but will be a vehicle to accomplish goals in the Green Parks Plan.

Findings

NPS' efforts to engage its staff and the public to reduce greenhouse gas emissions through CFP before there was a mandate to do so are commendable. CFP, however, never matured from initiative to full-scale program. We found issues with accountability, data quality and assurance, and program sustainability. NPS needs to address these issues, as several CFP components have been identified in plans to meet new reporting mandates.

We found an absence of accountability once a park develops an action plan and becomes a CFP member. A standard mechanism does not exist to measure, track, and report a park's progress and outcome, or analyze which actions are most beneficial. Further, the manner in which greenhouse gas inventory data are collected, verified or validated, and updated at CFP member parks places the Service at risk for overstating or underreporting emission numbers. These numbers, therefore, cannot be relied upon to provide accurate reporting information required by the newly issued Council on Environmental Quality (CEQ) guidance. Finally, we identified areas that merit CFP attention to achieve sustainability: integration options and a clear long-term plan.

Accountability

The process for becoming a CFP member park (see Figure 2) is not adequately outcome-oriented. More emphasis is placed on attaining CFP membership than on actions taken or results achieved. To be classified as members of the CFP network, parks need only develop a greenhouse gas baseline inventory and an action plan describing strategies the park will use to lower greenhouse gas emissions. Classification is automatic regardless of whether action goals are met or park emissions are lowered. Once achieved, classification lacks follow-up accountability for monitoring or tracking implementation of a park's proposed action plan. NPS officials perform little to no oversight once action plans are completed.

In addition, no analysis identifies which proposed actions would be most beneficial for the parks. The action plans themselves generally do not contain specific target dates specifying when individual actions must be accomplished or who is responsible for meeting them. Without linking specific actions with target dates, a plan becomes a statement of general intentions with no accountability for emissions reduction goals.

Although CFP member parks are asked to continue measuring emissions and following up on actions, little evidence indicates that this is an ongoing activity. Without systematically measuring actions taken, park officials miss opportunities to gauge success in implementing CFP action plans and reducing emissions. Focusing only on planning offers no assurance that actions will be accomplished or that results can be tied to CFP. A good tracking system can provide valuable

feedback to park staff, stakeholders, and management so they can recognize emission reduction opportunities and learn which actions were most beneficial.

General Process for Becoming a Climate Friendly Park

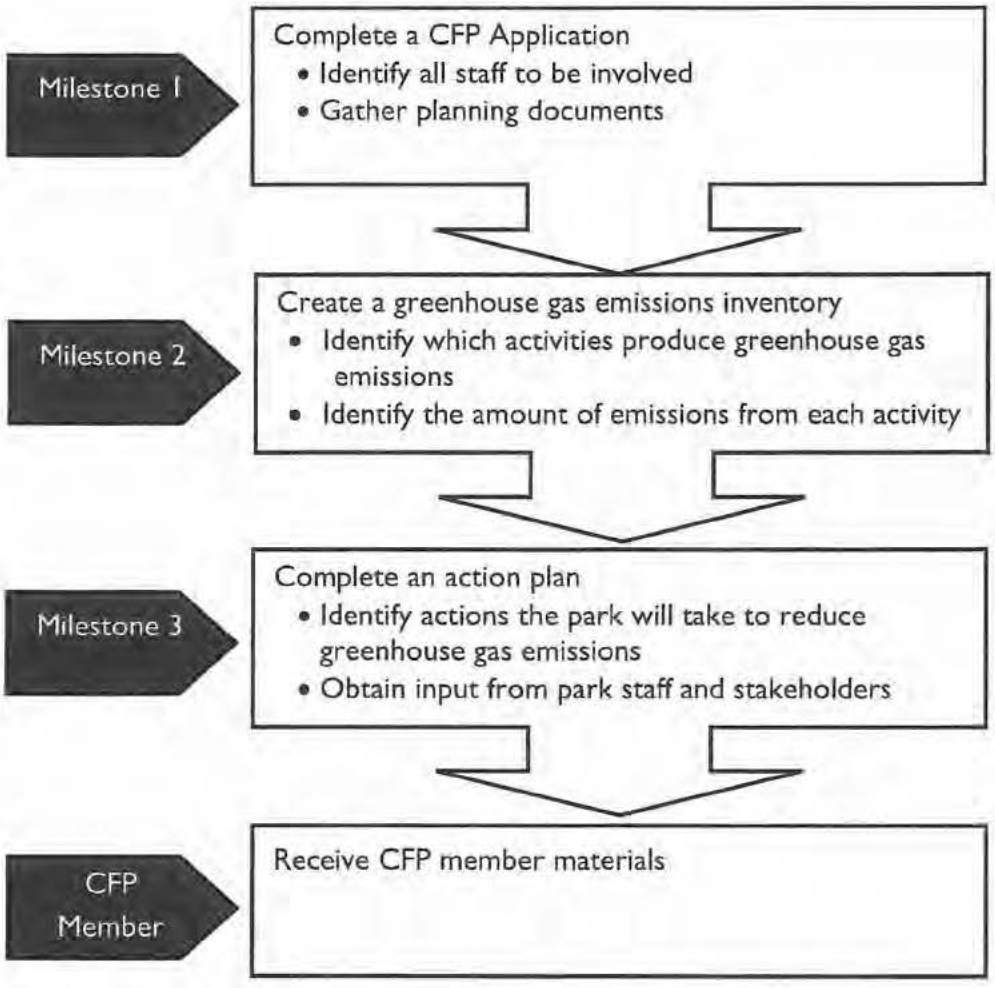

Figure 2. This flowchart illustrates the general process of becoming a CFP member.

In October of 2010, the CEQ issued a greenhouse gas accounting and reporting guidance stating that projects or activities must be measured and verified to ensure emission reduction measures meet planned milestones and goals. Until the deficiencies that we have outlined are corrected, the action plans will not fulfill this requirement.

Recommendation

1. Systematically monitor and report CFP-related results, including actions taken and outcomes achieved.

Data Quality and Assurance

The CEQ's guidance addresses verification and validation only briefly, leaving wide latitude for agency managers to determine the appropriate course(s) of action. The guidance does state, however, that greenhouse gas inventories should be verified to ensure accuracy and consistency.

The purpose of [greenhouse gas] accounting verification is to provide confidence that reports of [greenhouse gas] emissions are complete, accurate, consistent, transparent, and without significant errors.

- Federal Greenhouse Gas Accounting and Reporting Guidance, Council on Environmental Quality, October 2010

Data quality is an important aspect of the greenhouse gas inventory process. A key CFP element is the Climate Leadership in Parks (CLIP) tool, which is an Excel spreadsheet used to input source data and estimate the volume of greenhouse gas emissions associated with various aspects of park operations. CFP member parks use multiple sources for data, such as annual energy, water, and Federal Automotive Statistical Tool reports to help capture estimated emissions.

PWR parks currently use interns to perform inventory functions. The interns are hired on a year-long basis. Although an independent contractor verifies the data entered by interns, we are concerned about the amount of oversight that is provided at the park unit level. We found that there is no requirement to have another NPS staff review the raw inventory data to validate the accuracy of the information.

In addition, we found that since the implementation of the new guidance, CFP member parks' baselines emission inventories have not been re-verified to reflect the required 2008 baseline emission levels. Systematic dates for updating or reporting greenhouse gas inventories also do not exist. This lack of consistency will make the inventories unsuitable for trend analyses, which can provide indicators of greenhouse gas reduction success or failure.

We also found that CFP officials have to manually input data collected at the national level, which leaves it more susceptible to error. Manual input occurs because the CLIP tool is not capable of rolling up agency aggregate level data automatically. The CEQ's guidance to Federal agencies acknowledges and allows for the use of different tools for calculating and managing emissions data so long as agencies ensure that the tool used is appropriately aligned with this guidance. According to CFP officials, although the CLIP tool has not been updated to be in line with greenhouse gas reporting requirements, 95 percent of the information used to report greenhouse gas inventories is found in existing data sets. The parks were contacted to fill in the gaps or missing information in reporting the FY 2010 annual greenhouse gas inventory.

The EO 13514 includes new data and reporting requirements. Current funding levels do not support developing new data collection capabilities or the staff and mechanisms necessary to collect and verify the data required to fulfill requirements. Without accurate data, it will be difficult to know how well goals are being implemented.

- DOI Strategic Sustainability Performance Plan, 2010

Updating the CLIP tool will help parks manage and maintain data necessary to develop and submit inventory that is timely, reliable, and appropriate for annual reporting to the greenhouse gas accounting and reporting portal.[3] Having the capability to receive real time information can increase management's responsiveness to the agency's emissions reduction goals.

Recommendations

2. Establish clear data quality standards and protocols, to include a secondary verification at the park unit level, and implement a systematic process to ensure adherence.

3. Update the CLIP tool's capabilities to ensure that agency aggregate level data is compiled automatically to be less prone to errors and meets current greenhouse gas accounting and reporting requirements.

[3] Pursuant to EO 13514, agencies are required to report their greenhouse gas emissions to CEQ by January 31, 2011 and annually thereafter using the electronic Greenhouse Gas Reporting Portal, established by the Department of Energy - Federal Energy Management Program.

Sustainability

Integration Potential

The Service faces a complex set of statutory and executive mandates, as well as national and regional initiatives. With limited time and resources to successfully meet all critical mission goals, park officials must evaluate existing environmentally-related systems, programs, and initiatives to determine the most effective way to address issues of environmental sustainability. To meet the performance goals of EO 13514, agencies are required to continue implementing an environmental management system (EMS) at all appropriate organizational levels. As the action plans developed for CFP dovetail into EMS implementation, we found that integration plans have been discussed, but no formal communication occurred at the time of our review to outline how integration would be addressed.

An integrated approach can improve efficiency, effectiveness, and compliance with environmental regulatory obligations and sustainability efforts. This concept is not new. One park unit superintendent expressed that pulling together the best parts of CFP and EMS would create a single tool to help parks be more accountable, while continuing to accomplish good things.

Need for Long-Term Plan

CFP's role in the climate change environment has continued to evolve. The initiative's benefits are notable. CFP has helped to empower park employees to work together innovatively, share ideas, and serve as role models in climate stewardship. With millions of people visiting parks each year, parks have the ability to educate the public on the impact of emissions on climate change. The initiative, however, has never developed a clear, long-term plan to outline how it could play a more viable role in the Service or further enhance NPS' ability to serve as a role model in climate stewardship.

4. Develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs, as well as its outreach potential.

Conclusion and Recommendations

Conclusion

NPS created CFP before the existence of a Federal mandate requiring agencies to inventory and reduce greenhouse gas emissions. Since its inception, CFP has educated and empowered park employees on the subject of climate change, and encouraged them to further demonstrate their commitment to conserve and protect the national parks by performing greenhouse gas inventories and taking steps to mitigate the effects of climate change. While CFP never matured from initiative to full-scale program, many parks have focused their planning on reducing emissions and changing their way of thinking and doing business.

Nevertheless, opportunities exist to improve the CFP design to make it more beneficial for parks and visitors alike. As NPS plans to institutionalize CFP action plans and perform emissions inventories using the CLIP tool, CFP organizers need to ensure results can be tracked and monitored. Having a systematic mechanism to measure, or track actions will allow park officials the opportunity to effectively gauge success in implementation of CFP action plans and reduction in emissions.

In addition, if the lack of meaningful data quality assurance is not addressed as a priority, significant risk is posed to the Service's credibility and ultimate success of CFP-related efforts to meet agency goals. Further, as the action plans developed for CFP dovetail into implementation of EMS, the Service should weigh the benefits of integrating the two initiatives. Finally, since CFP lacks a clear long-term plan, the Service should consider the value of this initiative and develop a plan to ensure that it plays a viable role in the climate change arena. By addressing these concerns, the Service will continue to be in the forefront of climate stewardship.

We offered recommendations to help NPS enhance the potential of CFP or its related components.

Recommendations

1. Systematically monitor and report CFP-related results, including actions taken and outcomes achieved.

   NPS Response: NPS is currently working on a data streamlining and consolidation initiative that will improve NPS' ability to track mitigation actions identified by CFP parks from concept through implementation. An update to the CLIP Tool Module 2 to help NPS better understand actions being planned and implemented at the park level is considered under this initiative. The NPS Branch Chief, Sustainable Operations will be handling this with a completion date of June 2012.

OIG Reply: We consider this recommendation resolved but not implemented.

2. Establish clear data quality standards and protocols, to include a secondary verification at the park unit level, and implement a systematic process to ensure adherence.

   NPS Response: NPS is preparing a Greenhouse Gas Inventory Management Plan, which will describe quality assurance, quality control, and verification procedures for the entire NPS Greenhouse Gas inventory. The NPS Branch Chief, Sustainable Operations will be handling this with a completion date of September 2011.

   OIG Reply: We consider this recommendation resolved but not implemented.

3. Update the CLIP tool's capabilities to ensure that agency aggregate level data is compiled automatically to be less prone to errors and meets current greenhouse gas accounting and reporting requirements.

   NPS Response: NPS is updating the CLIP Tool as part of its data consolidation and streamlining effort. This will align the CLIP Tool with the Federal Greenhouse Gas Guidance. This will also increase the CLIP Tool's ability to automatically roll data up to the headquarter level. The NPS Branch Chief, Sustainable Operations will be handling this with a completion date of June 2012.

   OIG Reply: We consider this recommendation resolved but not implemented.

4. Develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs, as well as its outreach potential.

   NPS Response: NPS will develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs. The NPS Branch Chief, Sustainable Operations will be handling this with a completion date of December 2012.

   OIG Reply: We consider this recommendation resolved but not implemented.

Appendix 1: Scope and Methodology

Scope

We performed our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency, "Quality Standards for Inspections." Our evaluation focused on the Hawaii Volcanoes National Park as an example of a Climate Friendly Park initiative member park. We also gathered information from other park units on a limited basis, and from pertinent national and regional NPS offices to assess CFP overall. We conducted our evaluation from April 2010 to July 2010. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

Methodology

For the purposes of conducting our evaluation, we interviewed NPS officials and staff from national, regional, and local park unit levels, and officials from partnering agencies. In addition, we completed the following:

- Reviewed applicable laws, policies, and other criteria,
- Reviewed CFP information on the NPS website,
- Attended the *2010 DOI Conference on the Environment* to gain broad understanding of related programs and initiatives across the Department and its bureaus,
- Interviewed support contractor personnel and Environmental Protection Agency staff with knowledge of the program,
- Attended a Pacific Islands Network CFP workshop to observe orientation and the action planning process,
- Conducted site visits at Hawaii Volcanoes National Park and Haleakala National Park to observe climate friendly actions, and
- Collected and reviewed pertinent CFP-related documentation (through staff and/or by accessing NPS intranet) to better understand issues such as: staff/contractor utilization, interagency roles/relationships, use and management of Climate Leadership In Parks (CLIP) tool and data.

Limitations

The limitations to our evaluation include the following:

- We did not perform an in-depth analysis of the Climate Leadership in Parks (CLIP) inventory tool.
- We did not perform an in-depth evaluation of the greenhouse gas inventory performed at Hawaii Volcanoes or any other CFP member park.

Appendix 2 : Sites Visited or Contacted

U.S. National Park Service
Pacific West Regional Support Office Seattle, Washington
Washington Support Office Washington, DC
Honolulu Field Office Honolulu, Hawaii
Haleakala National Park Island of Maui
Hawaii Volcanoes National Park Island of Hawaii
Apostle Islands National Lakeshore Bayfield, Wisconsin
Other Federal Agencies
U.S. Environmental Protection Agency Washington, DC
U.S. Bureau of Land Management Washington, DC Denver, Colorado
U.S. Fish & Wildlife Service Washington, DC

Appendix 3: NPS Response

The National Park Service's response to the draft report follows on page 16.

United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

2420 (0015)

JUL 1 3 2011

Memorandum

To: Assistant Inspector General for Audits, Inspections, and Evaluations
Attn: Kimberly Elmore

From: Director

Subject: National Park Service response to Office of Inspector General (OIG) Draft Evaluation Report entitled: National Park Service: Climate Friendly Parks Initiative (Report No. HI-EV-NPS-0001-2010)

The National Park Service (NPS) has reviewed the Office of Inspector General subject report and commend your staff for highlighting the challenges faced and for the fairness they demonstrated during their work. Below are the NPS detailed responses to the OIG's specific recommendations, including steps the NPS has already taken, and continues to take to address these recommendations target dates for implementation, and titles of the officials responsible for implementation.

Background

The National Park Service's Climate Friendly Parks Program (CFP) was reviewed to determine whether CFP member parks benefit from participation and to identify further benefits that could be derived through enhancements to the CFP design. In light of recent Federal mandates, OIG modified the review objective to include a determination of how CFP could help NPS meet the new greenhouse gas emission reporting requirements set forth in Executive Order (EO) 13514, "Federal Leadership in Environmental, Energy, and Economic Performance."

The new EO requires agencies to continue implementing an environmental management system (EMS) at all appropriate organizational levels. Starting in 2011, agencies are also required to set baseline emission inventories and greenhouse gas reduction goals. They must institute a framework for annual reporting and accountability regarding each agency's sustainability performance. Under the new guidelines, agencies are also required to "measure, report, and reduce their greenhouse gas emissions from direct and indirect activities."

NPS has recently developed a comprehensive strategy for sustainable management, called the Green Parks Plan, to fulfill the EO and other agency directives. Currently in draft, the Green Parks Plan sets ambitious goals for greenhouse gas reduction and calls for all parks to enter the CFP network.

Recommendations

Recommendation 1:
Systematically monitor and report CFP-related results, including actions taken and outcomes achieved. This will be handled by the NPS Branch Chief, Sustainable Operations.

The forthcoming Green Parks Plan and report will be the both the tool and the process for monitoring CFP related actions. We additionally have a reporting form we send to CFP parks annually to collect anecdotal information about CFP accomplishments.

Actions Taken/Planned – Completion Date 06/2012
NPS is currently working on a data streamlining and consolidation initiative that will improve NPS's ability to track mitigation actions identified by CFP parks from concept through implementation. An update to CLIP Tool Module 2 to increase ability to understand actions being planned and implemented at the park level is being considered under this initiative

Recommendation 2:
Establish clear data quality standards and protocols, to include a secondary verification at the park unit level, and implement a systematic process to ensure adherence. This will be handled by the NPS Branch Chief, Sustainable Operations.

Parks also use the greenhouse gas (GHG) inventory data generated by Climate Friendly Parks (CFP) in reports to DOI, such as the Federal Automotive Statistical Tool (FAST) data, and the Energy Data Management Report (EDMR). These data are validated on many levels for DOI.

Regarding QA/QC of data and inventories, our consultants reviewed the data in each inventory for consistency and completeness. In March 2011, the consultant developed a third module for CLIP, that explains and performs QA/QC on park data.

The NPS complies with DOI's GHG accounting in compliance with EO 13514, using the FAST, EDMR, and other data that parks track. We encourage parks to use the CLIP tool to track their individual GHG emissions, but until all parks are able to complete inventories on an annual basis, CLIP will be an enhancement for parks, not the main venue for assessing NPS-wide GHG emissions.

Actions Taken/Planned – Completion Date 09/2011
The NPS is preparing a GHG Inventory Management Plan, which will describe quality assurance, quality control (QA/QC) and verification procedures for the entire NPS GHG inventory.

Recommendation 3:
Update the CLIP tool's capabilities to ensure that agency aggregate level data is compiled automatically to be less prone to errors and meet current greenhouse gas accounting and reporting requirements. This will be handled by the NPS Branch Chief, Sustainable Operations.

A future task that has been proposed to management and is pending funding approval is to allow upload of individual park inventories to an intranet web database.

Actions Taken/Planned – Completion Date ***06/2012***
NPS is updating the CLIP Tool as part of the data consolidation and streamlining effort to align the CLIP Tool with the Federal GHG Guidance. This will also further increase the CLIP Tool's ability to automatically roll data up to the headquarters level.

Recommendation 4:
Develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs, as well as its outreach potential. This will be handled by the NPS Branch Chief, Sustainable Operations.

Currently parks enter the same or similar data several times for different reporting requirements to different offices. The Sustainable Operations & Climate Change branch is working on data integration for parks to get the same data with less repetition in all of its reporting, not just CFP alone. The work is in process, with the goal of park employees entering data once, for the generation of multiple reports. This will address EO 13514, EMS, and DOI's Strategic Sustainability Performance Plan.

Actions Taken/Planned – Completion Date 12/2012
NPS will develop a long-term plan for the CFP initiative that takes into consideration the initiative's integration potential with other environmental programs.

Should you have any questions about these responses, please contact Shawn Norton, Environmental Leadership, at 202-354-1835 or [redacted], NPS GAO/OIG Audit Liaison Officer, [redacted]

Appendix 4: Status of Recommendations

Recommendation	Status	Action Required
1, 2, 3, 4	Resolved; Not Implemented	We will refer these recommendations to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.

Report Fraud, Waste, and Mismanagement

Fraud, waste, and mismanagement in Government concern everyone: Office of Inspector General staff, Departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to Departmental or Insular Area programs and operations. You can report allegations to us in several ways.

By Internet:	www.doioig.gov	
By Phone:	24-Hour Toll Free:	800-424-5081
	Washington Metro Area:	202-208-5300
By Fax:	703-487-5402	
By Mail:	U.S. Department of the Interior Office of Inspector General Mail Stop 4428 MIB 1849 C Street, NW. Washington, DC 20240	

Enclosure 6

DOI Response to Bicameral Task Force on Climate Change Inquiry, February 25, 2013 DRAFT

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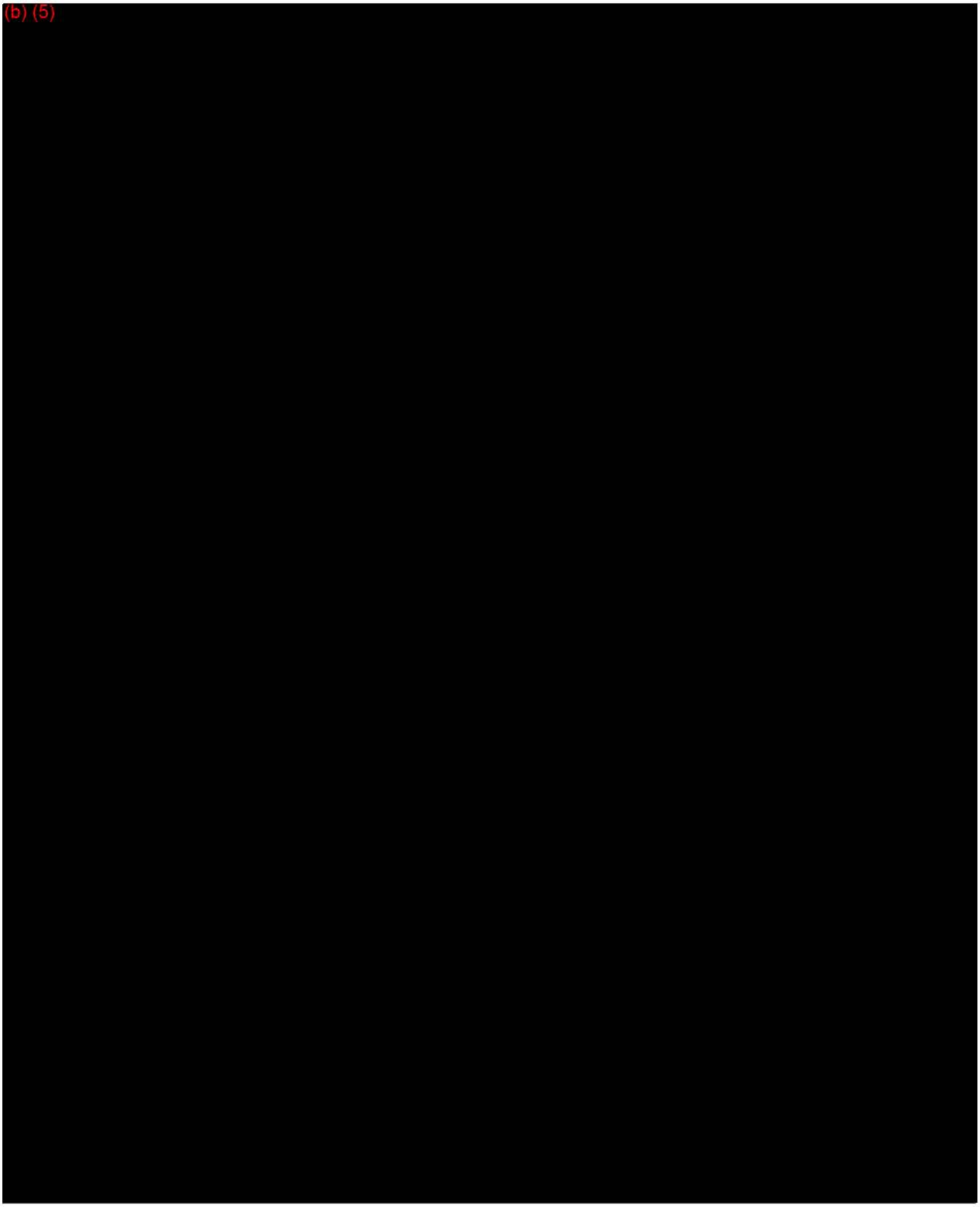

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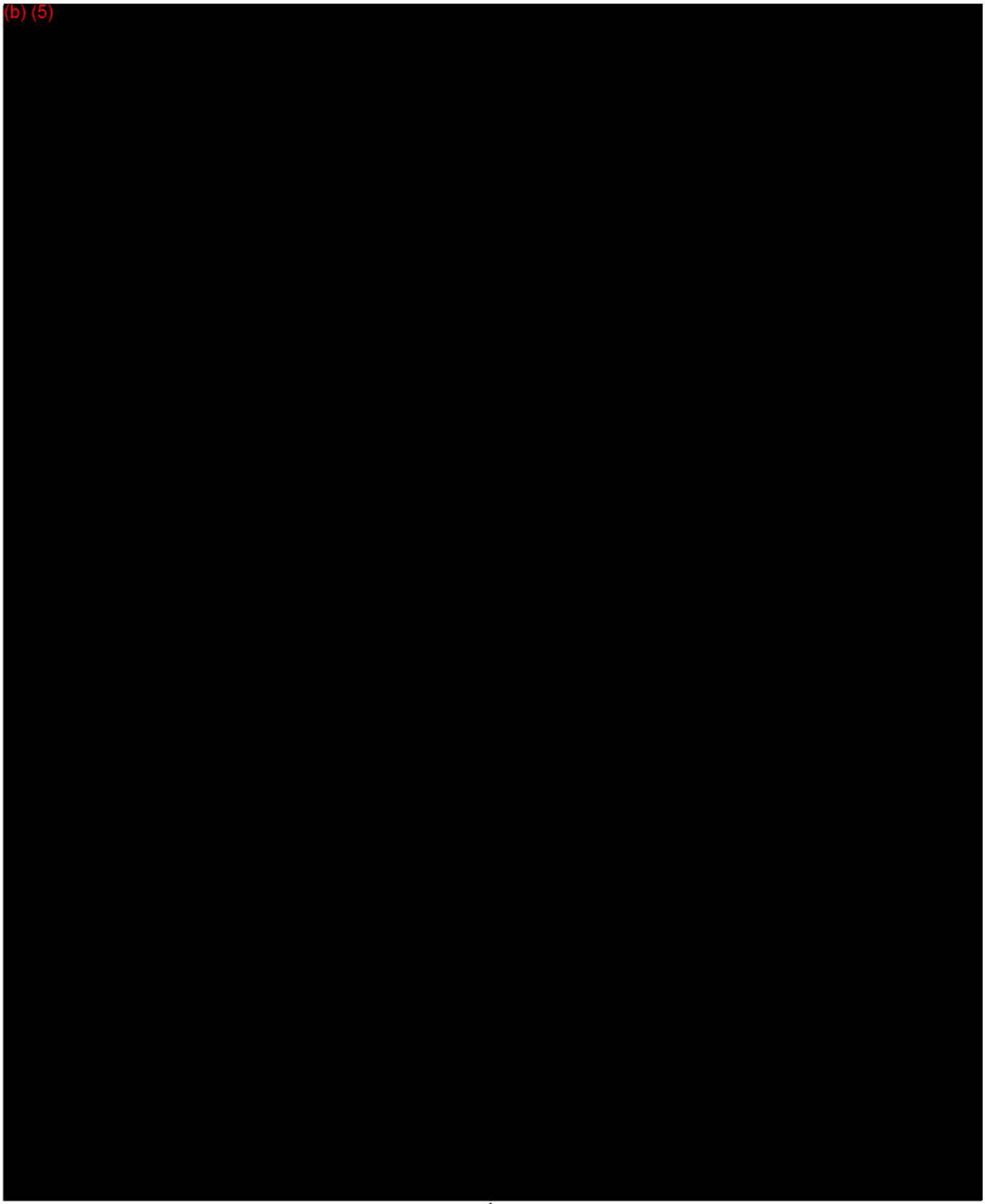

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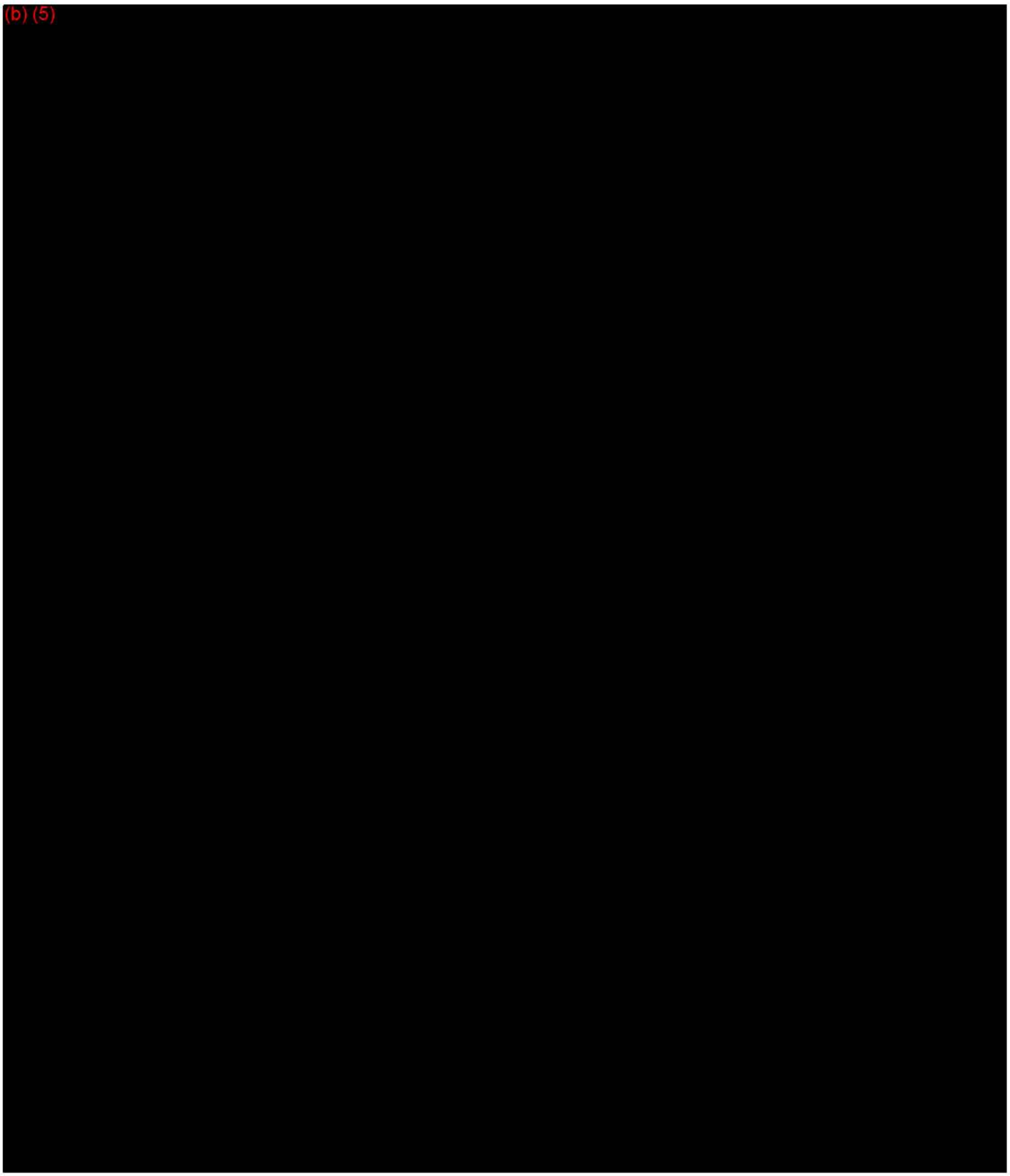

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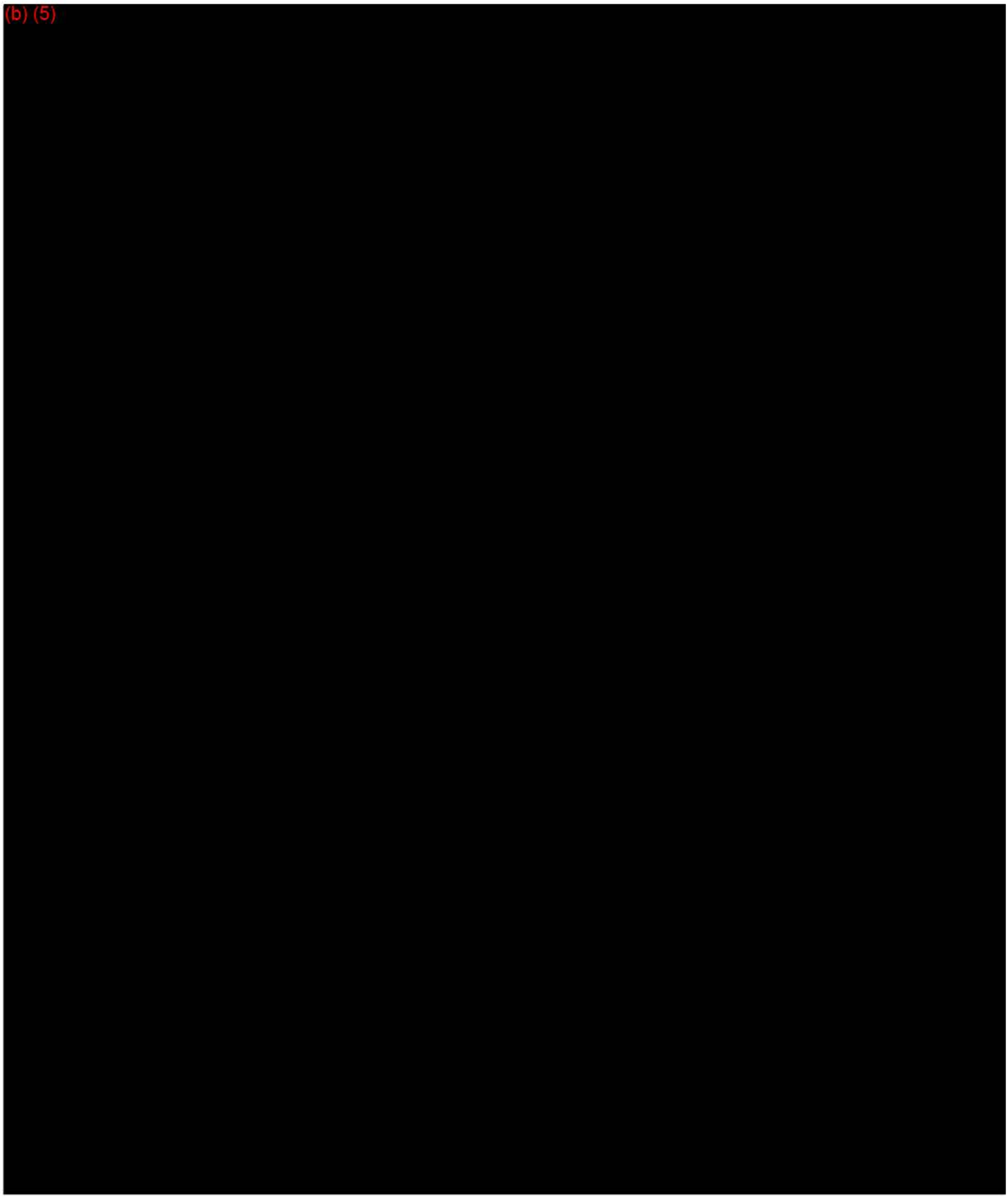

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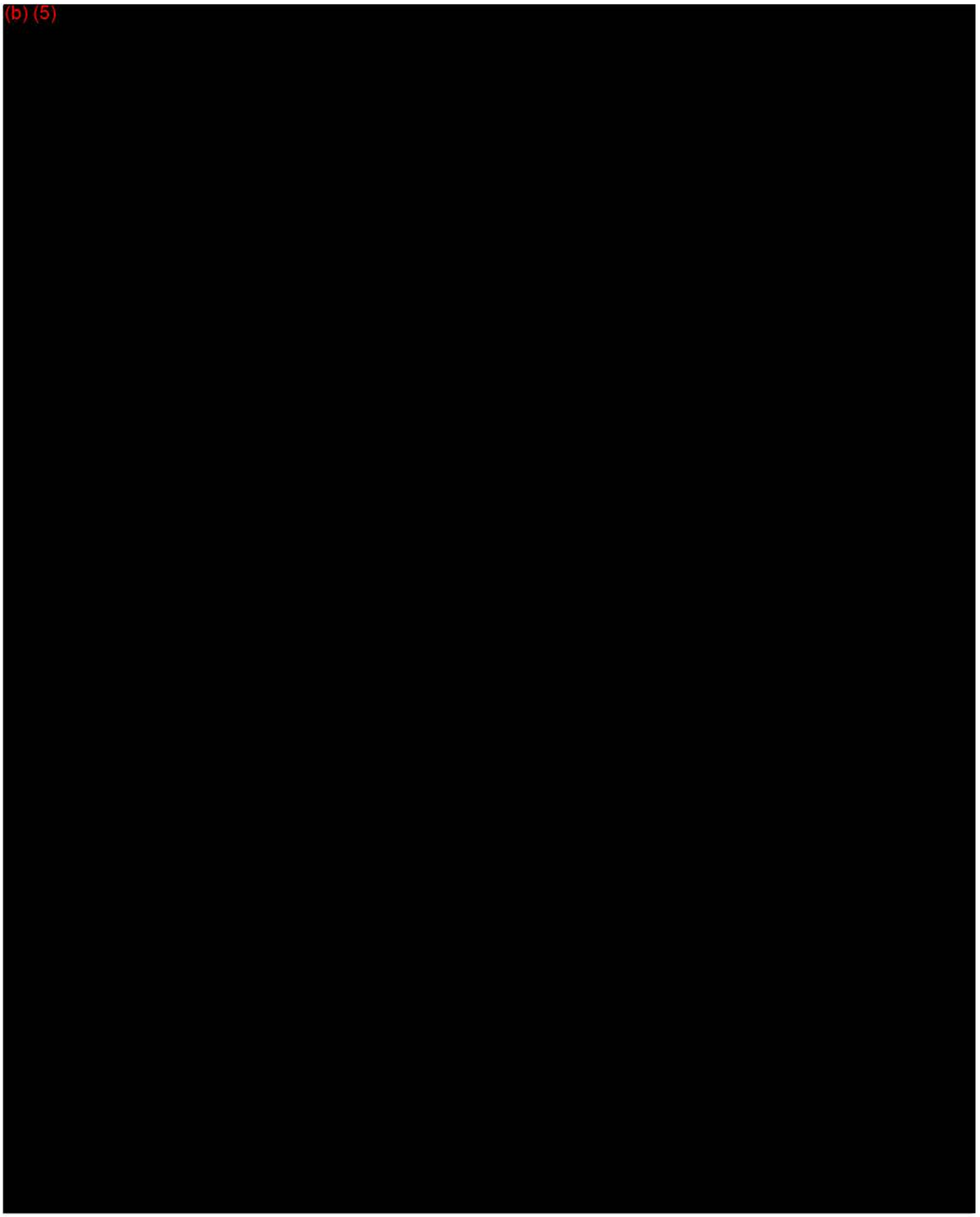

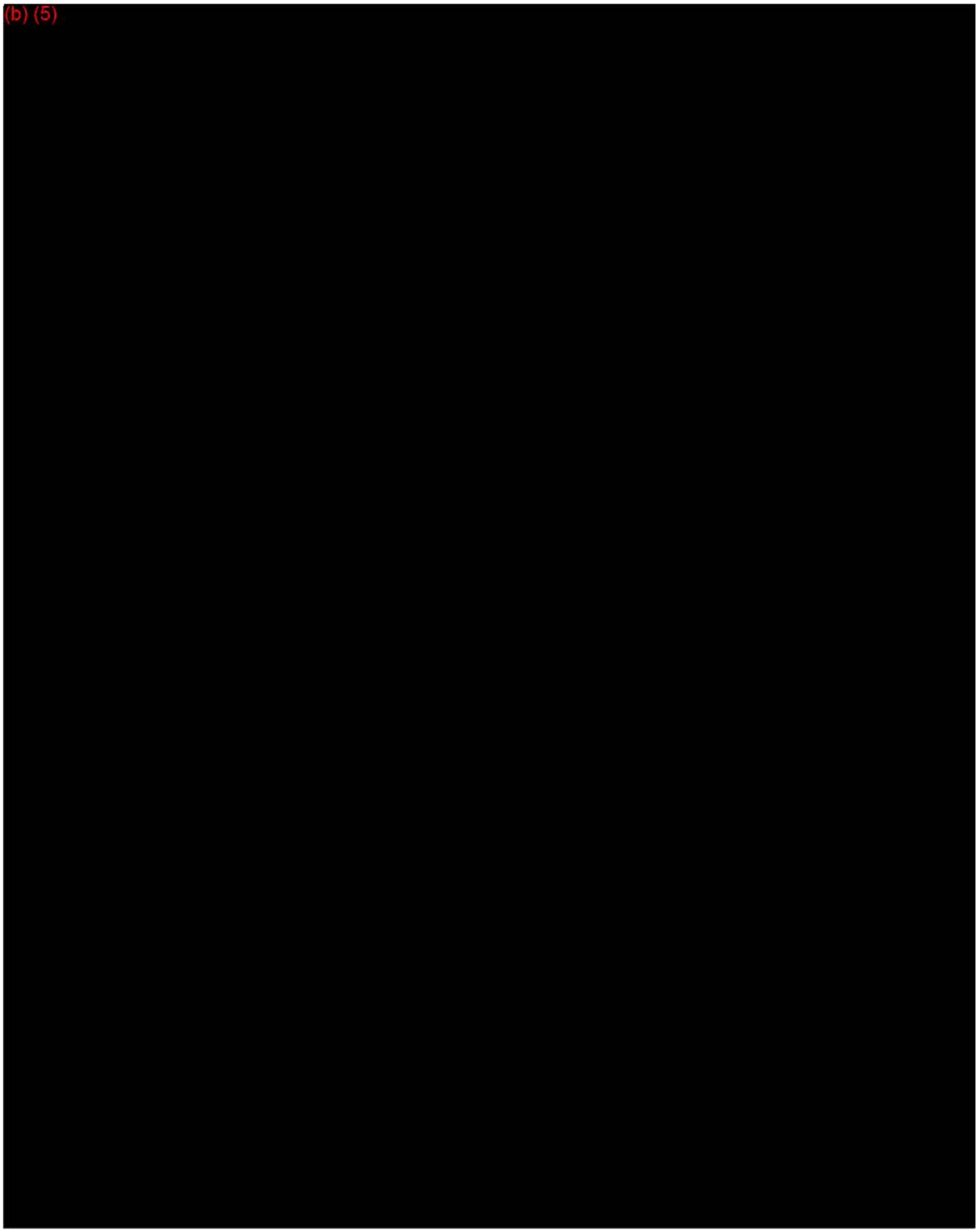

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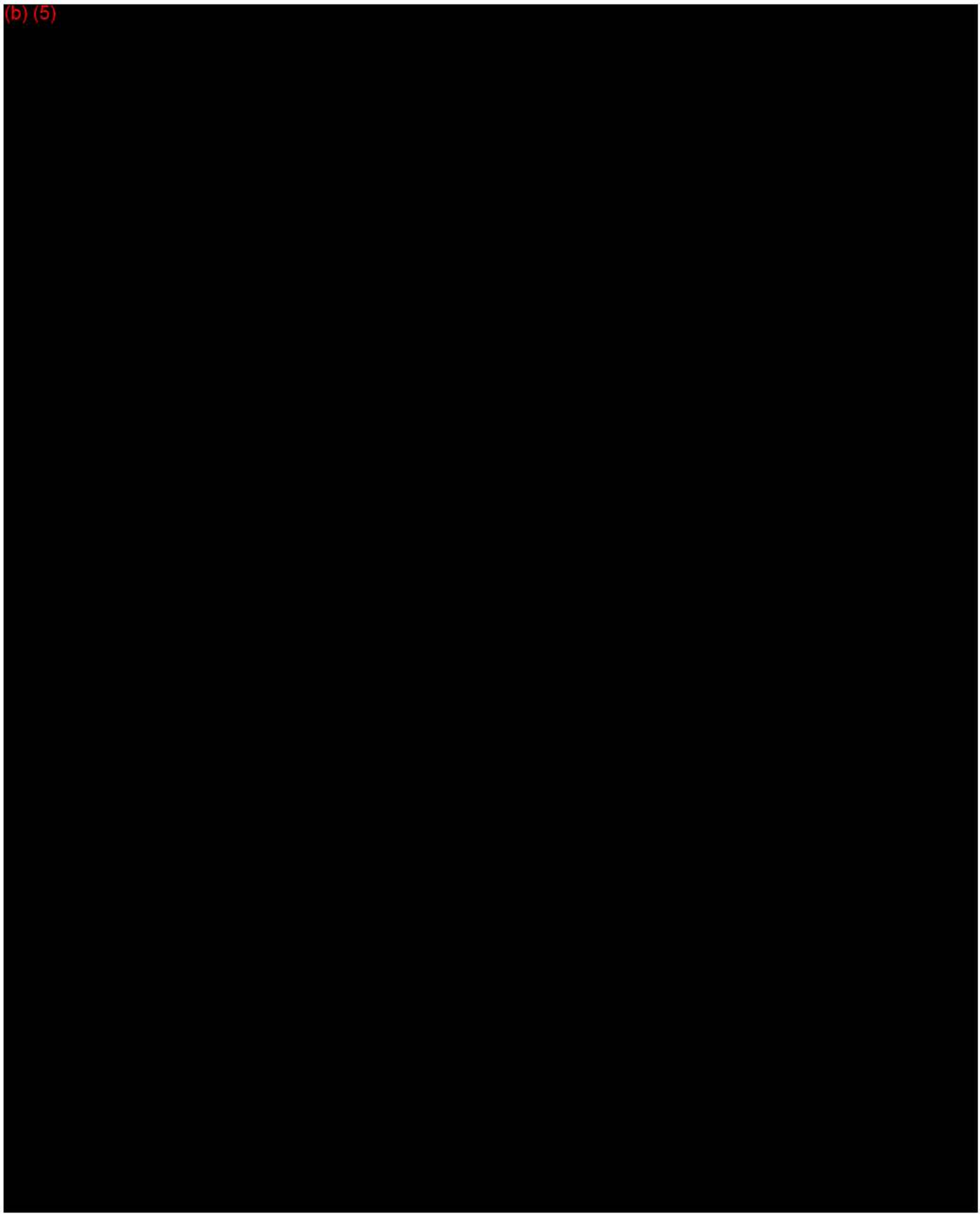

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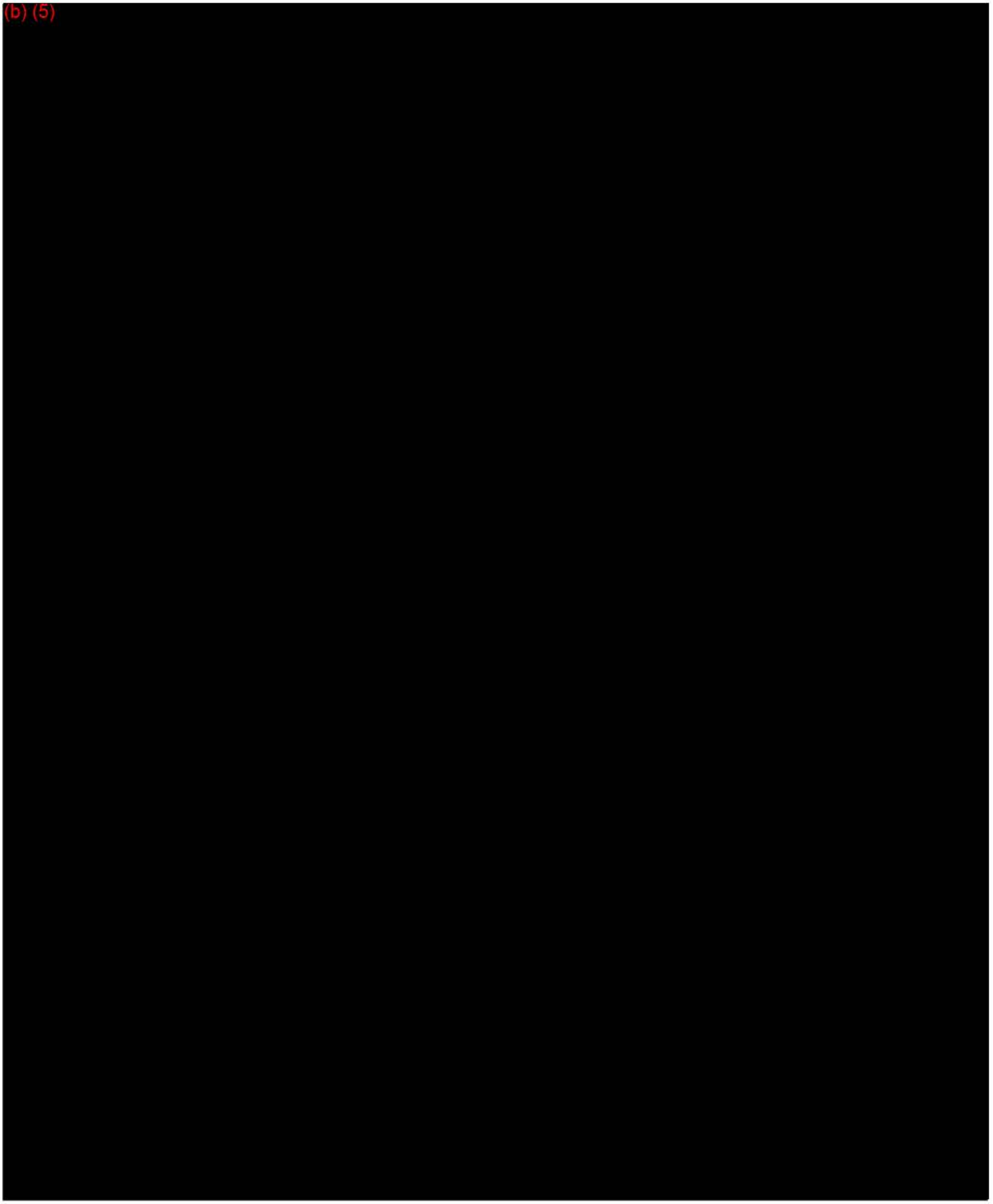

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