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Description of document: Peace Corps Inspector General (OIG) response to a Congressional request for "agency"-specific information on climate change, 2013

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Peace Corps  
Office of Inspector General  
P.O. Box 57129  
Washington, DC 20037-7129

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August 2013

**OFFICE OF INSPECTOR GENERAL**

August 21, 2013

This letter is in response to your August 4, 2013 request, under the provisions of the Freedom of Information Act (FOIA), 5 U.S.C. §552, for a "I request a copy of the documents and/or any other response provided to the Bicameral Task Force on Climate Change in response to their February 25, 2013 letter request to the Office of Inspector General) signed by Co-Chairs Henry A. Waxman and Sheldon Whitehouse, Edward J. Markey and Benjamin L. Cardin."

The attached records have been released in response to your FOIA request.

You have a right to appeal my decision within 15 days of receipt of this letter by writing to the Inspector General, Office of Inspector General, Peace Corps, 1111 20<sup>th</sup> St., N.W., Washington, DC 20526.

Sincerely yours,

Jeffrey Reichert  
FOIA Officer

enclosure

cc: Denora Miller, FOIA/Privacy Act Officer, Office of Management



April 15, 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

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

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

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

Dear Representatives Waxman and Markey and Senators Whitehouse and Cardin:

This letter represents the Peace Corps Office of Inspector General's (OIG) response to your February 25, 2013 letter seeking information concerning the Peace Corps' actions to address climate change in accordance with Executive Order (E.O.) 13514 of October 5, 2009, "Federal Leadership in Environmental, Energy, and Economic Performance," and the "Energy Independence and Security Act of 2007."

The first part of your request asked OIG to identify existing requirements in these legal authorities that apply to the Peace Corps, and to assess whether the Peace Corps is meeting these requirements. If not, you requested OIG make recommendations for improving performance. The second part of your request sought an assessment of any additional authorities the Peace Corps has to reduce emissions of heat-trapping pollution and make the

**Peace Corps Office of Inspector General**

nation more resilient to the effects of climate change. Finally, you asked OIG to assess any additional steps the Peace Corps could take to reduce emissions or strengthen resiliency.

As some of the requested information falls under the purview of the Peace Corps' Office of General Counsel (OGC), OIG consulted with it in developing this response in order to identify the existing requirements in legislation, regulation, executive order, and other directives that apply to the agency.

### **The Peace Corps' Operating Environment and Sustainability Initiatives**

The Peace Corps is an independent executive branch agency, as defined in 5 U.S.C. § 105, with approximately 900 full-time equivalent employees, 2,700 personal services contractors, facilities, and vehicles located in 72 countries worldwide. The Peace Corps' eight domestic locations, including a headquarters office and seven regional recruiting offices, and 18 of its 20 vehicles used domestically are leased by the General Services Administration (GSA). To avoid duplicative reporting, GSA, as the owner of these properties, is responsible to report on sustainability initiatives concerning its assets. Internationally, most overseas offices and staff residences are leased, though all overseas vehicles are owned by the agency. The Peace Corps' Office of Management, Administrative Services is charged with the mission of driving sustainability initiatives for the agency.

On January 14, 2010 former Peace Corps Director Williams outlined the agency's comprehensive commitment to sustainability. The Peace Corps annually publishes excerpts from its Strategic Sustainability and Performance Plan<sup>1</sup>, which summarizes agency initiatives and performance in this area. Sustainability at the Peace Corps aims to leverage the spirit, creativity, and innovation of employees to reduce the agency's global environmental footprint. This is primarily accomplished through the establishment of its "Green Team." The Green Team offers opportunities for employees to participate in sustainability initiatives at the Peace Corps. All employees are invited to join the Green Team and give input on the agency's sustainability plans and special projects, share resources, and network across the agency.

### **Legal Framework and Applicability to the Peace Corps**

According to OGC, the agency is subject to the following statutes, regulations, and E.O.s: the National Energy Conservation Policy Act of 1978, as amended; the Federal Energy Management Improvement Act of 1988, Pub. L. 100-615; the Energy Independence and Security Act (EISA) of 2007, Pub. L. 110-140; the Energy Policy Act of 2005 (EPAct), Pub. L. 109-58; E.O. 13423 - Strengthening Federal Environmental, Energy, and Transportation Management; and E.O. 13514 - Federal Leadership in Environmental, Energy, and Economic Performance.

However, in practice many of their key provisions are not applicable. For example the headquarters building is not an agency asset but rather a GSA leased building and the agency's extensive international footprint is not subject to the requirements of the statutes, regulations and E.O.s listed above.

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<sup>1</sup> [http://files.peacecorps.gov/multimedia/pdf/policies/2012\\_Strategic\\_Sustainability\\_Performance\\_Plan.pdf](http://files.peacecorps.gov/multimedia/pdf/policies/2012_Strategic_Sustainability_Performance_Plan.pdf)

In addition, most overseas offices and staff residences are leased, while some offices and residences are made available to the agency in the form of a host-country in-kind contribution. In accordance with the authority in section 15(d)(9) of the Peace Corps Act and with agency policy listed in the *Peace Corps Manual* section 733, leases may be awarded for up to, but not to exceed five years, subject to the availability of funds for obligation at the time of contract execution. There is a significant cost barrier to retrofitting a building that the agency does not own.

The agency is nevertheless committed to applying sustainability principles to its international operations. For example, the agency has implemented green teams overseas, collected energy data, and, where possible, retrofitted buildings with energy conservation measures (i.e. Energy Star rated air conditioners, occupancy timers and CFL lights) overseas.

### **Agency Compliance Efforts and Results**

The Peace Corps follows the guiding principles of EISA, the EPAct, and E.O.s 13423 and 13514. The Peace Corps reports greenhouse gas emissions annually to U.S. Department of Energy (DOE) in accordance with guidance developed by DOE Office of Environmental Policy and Assistance and Federal Energy Management Program (FEMP). In addition, the Peace Corps is continuing to develop strategies to build environmental resilience into the agency's mission as outlined by the White House Council on Environmental Quality. For instance, the Peace Corps submits an annual greenhouse gas management plan, annual greenhouse gas inventory report, and a strategic sustainability performance plan that address domestic operations. Petroleum reduction requirements from Scope 1 Mobile (vehicle fleet) energy is reported to DOE through an annual Federal Automotive Statistical Tool (FAST) report, and the Office of Management and Budget reviews the agency's Strategic Sustainability Performance Plan. Although E.O. 13514 applies to activities and resources in the United States, the Peace Corps' Green Team seeks to leverage the agency's global presence and apply the spirit and intent of E.O. 13514 wherever possible to its overseas operations.

The agency reports that domestically, DOE FEMP is able to track the three gases that contribute to greenhouse gas emissions because they are able to track the fuel combustion source that contributes to domestic regional energy grids. High cost and uncertain accuracy make an international greenhouse inventory impractical for the Peace Corps at this time. For its own use the Peace Corps is working to compile energy intensity models that consider heating/cooling degree days at overseas buildings. In this way, the agency may benchmark overseas facilities' performance with other Peace Corps facilities. From these models the agency may look closer at high energy users and conduct energy audits that create cost effective recommendations.

Domestically, measuring and monitoring sustainability performance is challenging due to the agency's size and link with GSA. Because the agency does not own many of the assets reported in the DOE FEMP worksheet, the Peace Corps relies on GSA to ensure and report on the utilization of "sustainable services." In addition, because GSA is not able to provide the Peace Corps access to complete data sets, the agency is unable to track energy conservation measures. Based on an internal analysis, the agency reports that it has reduced greenhouse gas emissions; yet current GSA methodology does not reflect this.

On May 24, 2011, President Obama issued – the “Federal Fleet Performance” memorandum outlining a Vehicle Allocation Methodology report. In response to this requirement to right size the agency’s fleet, the Peace Corps prepared a vehicle fleet plan and Vehicle Allocation Methodology report which was reviewed by GSA. Using GSA’s new methodology, the agency has established a trajectory to domestically operate 100 percent alternative fuel vehicles (including hybrids) by 2014. Extra costs and coordination with GSA may create additional challenges to meeting this goal.

On February 21, 2012, President Obama issued the “Driving Innovation and Creating Jobs in Rural America” memorandum regarding bio-based and sustainable product procurement. The Peace Corps reports that it is moving to implement it in 2013. The agency also reports that it is working to ensure that by 2018, 95 percent of new contract actions are sustainable per the Office of the Federal Environmental Executive (OFEE) and the Office of Federal Procurement Policy (OFPP) guidance.

The agency provides an annual assessment of its progress in its Strategic Sustainability Performance Plan. For 2011, the agency reported an overall increase in green house gas emissions over the 2008 baseline year. However, the agency’s analysis of available data indicates the increase was largely attributable to different survey methodologies used in 2008 and 2011 for emission calculations.

The Strategic Sustainability Performance Plan incorporates the plans the agency has to improve performance. OIG’s review of the performance goals outlined in the Plan indicates that the agency is on track to meet the targets identified. OIG has no recommendations to make at this time to improve the agency’s performance.

### **Unique Peace Corps Authority**

The second part of your request inquired about the authorities the Peace Corps has to reduce emissions of heat-trapping pollution, to make the nation more resilient to the effects of climate change, and the most effective steps the Peace Corps could take to reduce emissions or strengthen resiliency.

Peace Corps has unique tools and programs it can apply to this problem. The Peace Corps Act, P.L. 87-293, establishes the purpose of the agency: to promote world peace and friendship through a Peace Corps, which shall make available to interested countries and areas men and women of the United States qualified for service abroad and willing to serve, under conditions of hardship if necessary, to help the peoples of such countries and areas in meeting their needs for trained manpower, particularly in meeting the basic needs of those living in the poorest areas of such countries, and to help promote a better understanding of the American people on the part of the peoples served and a better understanding of other peoples on the part of the American people.

Peace Corps programs include strategies to assess and address climate-related risks in their respective sub-regions, host countries, and communities. With approximately 8,000 currently serving Volunteers, and over 200,000 returned Volunteers, the three goals of Peace Corps provide a framework for US citizens to foster capacity building skills with host county counterparts and enhance resiliency to the effects of climate change with their local US communities.

Overseas, for example, the Peace Corps participates in the Energy and Climate Change Partnership of the Americas. Through this program Volunteers continue to increase municipal, school, and communities' awareness and knowledge of climate change, energy efficiency, renewable energy, and mitigation and adaptation to climate change. Volunteers also enhance the availability of small businesses and micro-financing to support communities' abilities to implement, access, and maintain renewable energy technologies; and support community-led energy efficiency, renewable energy, and climate mitigation and adaptation projects.

Please do not hesitate to contact me at [kbuller@peacecorps.gov](mailto:kbuller@peacecorps.gov) or 202.692.2916 if you have any further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy A. Buller". The signature is fluid and cursive, with the first name "Kathy" being the most prominent part.

Kathy A. Buller  
Inspector General