Description of document: Treasury Inspector General for Tax Administration (TIGTA) response to a Congressional request for "agency"-specific information on climate change, 2013

Requested date: 03-August-2013

Released date: 04-September-2013

Posted date: 23-September-2013

Source of document: FOIA Request
Office of Chief Counsel Disclosure Branch
Treasury Inspector General for Tax Administration
City Center Building
1401 H Street, NW, Suite 469
Washington, DC 20005
Fax: (202) 622-3339
Email: FOIA.Reading.Room@tigta.treas.gov

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20005

INSPECTOR GENERAL
FOR TAX
ADMINISTRATION

September 4, 2013

This is in response to your Freedom of Information Act (FOIA) request dated August 4, 2013 seeking access to records maintained by the Treasury Inspector General for Tax Administration (TIGTA). The TIGTA Disclosure Branch received your request on August 8, 2013.

Specifically, you are requesting "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 TIGTA Office of Inspector General, signed by Co-Chairs Henry A. Waxman and Sheldon Whitehouse, Edward J. Markey and Benjamin L. Cardin."

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.

A search of TIGTA records located twelve (12) pages responsive to your request. We are releasing eleven (11) pages in full and one (1) page in part. We are asserting FOIA subsection (b)(6) as the justification for withholding.

FOIA subsection (b)(6) permits the withholding of records and information about individuals when disclosure of the information could result in a clearly unwarranted invasion of personal privacy. The withheld information consists of identifying information compiled with regard to individuals other than you. Releasing the withheld information would not shed any light into the Agency's performance of its official functions, but instead could result in an invasion into the personal privacy of the individual whose personal information has been withheld. As a result, the privacy interest of the third party outweighs the public's interest in having the information released.

We have enclosed an Information Sheet that explains the subsection cited above as well as your administrative appeal rights. You may appeal this decision within thirty-five (35) days from the date of this letter. Your appeal must be in writing and signed by you. You should address the envelope as follows:

Freedom of Information Act Appeal
Treasury Inspector General for Tax Administration
Office of Chief Counsel
City Center Building
1401 H Street, NW, Suite 469
Washington, DC 20005

Since the cost incurred for processing this FOIA request is less than $25.00, the threshold set by Treasury's FOIA regulation, we are not assessing any fees.

If you have any questions, please contact Government Information Specialist Diane Bowers at (202) 927-7043 and refer to Disclosure File #2013-FOI-00276.

Sincerely,

Diane K Bowers

Diane K. Bowers
(For) Amy P. Jones
Disclosure Officer

Enclosures

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF
INSPECTOR GENERAL

March 29, 2013

OIG-CA-13-006

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
Committee on Environment and Public Works
United States Senate

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
Committee on Environment and Public Works
United States Senate

Dear Mr. Waxman, Senator Whitehouse, Mr. Markey, and Senator Cardin:

This letter and its enclosure responds to your February 25, 2013, two-part request for information concerning the Department of the Treasury's (Treasury) efforts to confront the growing threat of climate change. We performed a review of Treasury's relevant programs and operations for which we have oversight responsibility. We coordinated our review with the Treasury Inspector General for Tax Administration, who received a similar request and has the oversight responsibility for the Internal Revenue Service (IRS). Although we planned to focus on Treasury's efforts to address climate change for the non-IRS programs and operations, we found that Treasury's authorities are centralized within the Office of Environmental Health and Safety and do not delineate between Treasury's offices and bureaus.

In preparing this response, we (1) reviewed applicable statutes, executive orders, policy, and guidance relevant to addressing the threat of climate change; (2) requested, obtained, and reviewed other relevant information and documentation from Treasury; and (3) interviewed Treasury officials responsible for addressing the growing threat of climate change. As a courtesy, we provided the Treasury officials with a draft of this letter and its enclosure and considered their comments as we prepared the final document.

Based on our review of relevant documents and interviews, we found that Treasury acknowledges that climate change will be one of the major challenges of the 21st century and understands that certain aspects of its operations and mission could be impacted by expected changes in regional climate conditions throughout the United States. Additionally, Treasury is taking a comprehensive approach to climate change that incorporates new knowledge and changing conditions into its missions, facility operations, and programs to adapt to a changing climate. In this regard, Treasury has demonstrated a commitment to leadership in environmental stewardship and complying with environmental and energy statutes, executive orders, and regulations.

The *Treasury Strategic and Sustainability Performance Plan*, issued June 2012, put forth the following priorities for Treasury offices and bureaus:

- Achieve an investment target of $9.5 million in performance-based contracts for federal building energy upgrades by the end of calendar year 2013[1]

- Follow through on energy reduction projects throughout Treasury to ensure that aggressive goals for reducing greenhouse gas (GHG) emissions are met by 2020.

- Implement a recycling system at the Bureau of Engraving and Printing's Washington, DC, facility to save 12 million gallons of potable water annually

- Integrate the social cost of carbon into budget allocation to ensure appropriate consideration when projects are selected for funding

- Improve the life cycle environmental management of electronic assets

[1] Presidential Memorandum, "Implementation of Energy Savings Projects and Performance-Based Contracting for Energy Savings" (issued Dec. 2, 2011), directed federal agencies to enter into performance-based contracts over the next 2 years for federal building energy upgrades with a government-wide minimum of $2 billion. Treasury's commitment is $9.5 million.

Among its recent accomplishments, Treasury reported that it:

- Received the Leadership in Energy and Environmental Design (LEED) Gold Certification for the Main Treasury Building which the U.S. Green Building Council believes is the oldest building in the world to achieve LEED certification;

- Reduced greenhouse gas (GHG) emissions from the 2008 baseline by 20 percent for Scopes 1 and 2 and 8.5 percent for Scope 3 placing Treasury ahead of planned GHG reductions by fiscal year 2020;[2]

- Increased renewable electricity use by 11 percent;

- Reduced fleet petroleum use by 61 percent using a 2005 baseline; and

- Installed an electric vehicle charging station at the Main Treasury Building for charging newly acquired electrical vehicles and for use by other federal agencies.

We would be pleased to brief you or members of your staff on this response or any other work under our respective or joint jurisdictions. If you have any questions, you may contact me at (202) 622-1090, or a member of your staff may contact Marla A. Freedman, Assistant Inspector General for Audit, at (202) 927-5400.

Sincerely,

/s/

Eric M. Thorson
Inspector General

Enclosure

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[2] GHG emissions are classified into three "scopes," based on source of emissions: Scope 1 emissions are direct GHG emissions from sources owned or controlled by an entity; Scope 2 emissions are indirect GHG emissions resulting from the generation of electricity, heating and cooling, or steam generated off site but purchased by the entity, and the transmission and distribution (T&D) losses associated with some purchased utilities; and Scope 3 emissions include indirect GHG emissions from sources not owned or directly controlled by the entity but related to the entity's activities. Scope 3 GHG emission sources currently required for federal GHG reporting include T&D losses associated with purchased electricity, employee travel and commuting, contracted solid waste disposal, and contracted wastewater treatment.

Response by the Inspector General of the Department of the Treasury
Request for Information Regarding the Department of the Treasury's Efforts to Address the Effects of Climate Change

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Part 1of Request from Bicameral Task Force on Climate Change

(1) Identify the existing requirements in legislation, regulation, executive order, and other directives that apply to [the Department of the Treasury (Treasury)]

We identified the following requirements to address climate change applicable to Treasury in statute, executive order, implementing guidance, and Treasury policy.

- The Energy Independence and Security Act of 2007[3] (EISA) governs the initiative to move the nation toward energy independence and security. Goals include (1) increasing the production of clean renewable fuel sources; (2) protecting consumers; (3) increasing the efficiency of products, buildings, and vehicles; (4) promoting research on and deploy greenhouse gas capture and storage options; and (5) improving the energy performance of the federal Government.

- Executive Order (E.O.) 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, issued October 5, 2009, directed federal agencies to reduce greenhouse gas emissions, improve energy and water performance, and leverage federal purchasing power to foster sustainable clean energy technologies and environmentally-responsible products. Specific to adapting to climate change, Section 8.(i) of E.O. 13514 requires that federal agencies "evaluate agency climate-change risks and vulnerabilities to manage the effects of climate change on the agency's operation and mission in both short and long term."

- *Federal Agency Climate Change Adaptation Planning Implementing Instruction* issued by the Chair of the Council on Environmental Quality (CEQ) on March 4, 2011, required that federal agencies establish an agency climate change adaptation policy statement and plan.

- *Policy Statement for Climate Change Adaptation*, issued by Treasury on June 28, 2012, established a Treasury-wide directive to integrate climate change adaptation planning and actions into agency programs, policies, and operations. In its policy, Treasury requires bureaus to (1) analyze how climate change may impact their ability to achieve respective missions,

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[3] Pub. L. No. 110-140

policies, programs, and operational objectives; (2) identify areas where budget adjustments and legal analysis would be necessary to carry out actions identified under the policy; and (3) coordinate with the Treasury Climate Change Adaptation Work Group which oversees and coordinates agency-wide climate change adaptation planning and implementation.

(2) Assess whether [Treasury] is meeting these requirements

We concluded that Treasury has met the requirements addressing climate change set forth in EISA, E.O. 13514, CEQ guidance, and Treasury policy. Specifically, Treasury issued the *Treasury Strategic Sustainability Performance Plan* (Sustainability Plan) which includes the *Climate Change Adaptation Plan: U.S. Department of the Treasury* (Adaptation Plan) in June 2012.

In the Sustainability Plan, Treasury addressed its efforts to achieve environmental, economic, and energy goals mandated in E.O. 13514 and prioritized actions based on a positive return on investment. Treasury also provided information in the Adaptation Plan in response to CEQ's implementing guidance which included developing an overarching policy statement about climate change, answering the guiding questions for high level vulnerability assessment, and providing details on current adaptation planning and implementation progress.

(3) If [Treasury] is not fully meeting the requirements, make recommendation for improving its performance

Based on our review, we have no recommendations for Treasury. We do want to caution that while Treasury has undertaken actions that are consistent with applicable statute, executive order, and implementing guidance for addressing climate change, we cannot provide assurance as to future compliance with these requirements or the effectiveness of its actions. That said, as part of our annual audit planning process, we will consider including periodic reviews of Treasury's progress in this important area.

Part 2 of Request from Bicameral Task Force on Climate Change

(1) The authorities the [Treasury] has to reduce emissions of heat-trapping pollution

We identified authorities applicable to Treasury in Part 1 of this request. We did not identify any other authorities Treasury may exercise to reduce emissions from heat-trapping pollution beyond its internal operations in the United States. We do want to note that Treasury receives appropriation authority to fund programs outside the United States through the Multilateral Development Banks and other international programs such as the Climate Investment Fund and Global Environment Facility. According to a Treasury official, some of these investments are intended to support global mitigation benefits which indirectly help the United States.

(2) Authorities to make the nation more resilient to the effects of climate change,

As noted in our response above, there were no authorities separate from those identified in Part 1 of this request and the appropriation authority to fund Treasury's international programs. We noted that CEQ recommended key steps for agencies to take to foster a common agenda of building a more resilient nation in its *Progress Report of the Interagency Climate Adaption Task Force: Recommended Actions and Support of a National Climate Change Adaptation Strategy* (CEQ Progress Report), issued in October 2010. Treasury has begun to address CEQ's recommended next steps consistent with requirements set forth in the E.O. 13514 as well as CEQ's implementing guidance, which Treasury is in compliance with to date. That is, Treasury issued the Sustainability Plan and Adaption Plan and has reported progress on the actions called for in these documents. For example, Treasury reported greenhouse gases (GHG) emission reductions of 20 percent for Scopes 1 and 2 and 8.5 percent for Scope 3, which are on track with targeted GHG emission reductions of 33 percent for Scopes 1 and 2 and 11 percent for Scope 3 by fiscal year 2020. Treasury also reported a 61 percent reduction in fleet petroleum use, already surpassing its fiscal year 2015 goal of 20 percent. Additionally, Treasury reported efforts to address climate change in its Adaptation Plan which include refining incident command and continuity of operations plans, increasing use of telework and flexible workspace, and providing emergency electricity generators and back up batteries to power key installations.

(3) The most effective additional steps [Treasury] could take to reduce emissions or strengthen resiliency

Treasury officials we interviewed did not offer any additional steps that Treasury could take to reduce emissions or strengthen resiliency outside the recommended next steps in the CEQ Progress Report. Based on our review and understanding of Treasury's missions and authorities, we did not separately identify additional steps that Treasury should be taking at this time.

Bowers Diane K TIGTA

From:	Sutphen Matthew S TIGTA
Sent:	Thursday, April 18, 2013 1:10 PM
To:	kiren.gopal@mail.house.gov; emily_enderle@whitehouse.senate.gov
Subject:	Final Response
Attachments:	Bicameral letter - Cardin.pdf; Bicameral letter - Markey.pdf; Bicameral letter - Waxman.pdf; Bicameral letter - Whitehouse.pdf; Bicameral attachment.pdf

Good afternoon Kiren and Emily,

First and foremost, thank you both for your patience. Attached please find TIGTA's final response to the Feb. 25 bicameral task force on climate change's request, which includes a cover letter for each of the co-chairs as well as the attachment that should be included with each cover letter. Hard copies have been placed in the mail. Please do not hesitate to contact me should you have additional questions and/or any concerns.

Thank you!

Matthew

Matthew S. Sutphen, Esq.
Counselor to the Inspector General
Phone: (202) 927-7266
Mobile: (b)(6) [redacted]

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20005

INSPECTOR GENERAL
FOR TAX
ADMINISTRATION

April 17, 2013

The Honorable Henry A. Waxman
Co-Chair
Bicameral Task Force on Climate Change
Committee on Natural Resources
2204 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Waxman:

This letter and its enclosure responds to your February 25, 2013, request for information concerning the Internal Revenue Service's (IRS) efforts to confront the growing threat of climate change. We gathered data about the IRS's relevant programs and operations related to climate change and coordinated our efforts with the Treasury Inspector General, who received a similar request and has the oversight responsibility for the U.S. Department of the Treasury (hereafter referred to as the Department).

In preparing this response, we (1) reviewed applicable statutes, Executive orders, policy, and guidance relevant to addressing the threat of climate change; (2) requested, obtained, and reviewed other relevant information and documentation from the IRS; and (3) interviewed Department and IRS officials responsible for addressing the growing threat of climate change. As a courtesy, we provided IRS officials with a draft of this letter and its enclosure and considered their comments as we prepared the final document.

Based on our review of relevant documents and interviews, we found that while much of the climate change policy and subsequent annual reporting is centralized at the departmental level, the IRS's size makes it a significant contributor to the Department's performance in reaching its energy and environmental goals, including those related to climate change. For example, 3,059 (86 percent) of the Department's 3,569 vehicles are owned or operated by the IRS. Furthermore, IRS facilities account for 15 (58 percent) of the 26 facilities for which the Department reports environmental and energy progress.[1]

The IRS reported the following recent accomplishments, among others, to the Department:

[1] The energy and environmental goals and accomplishments for properties leased by the IRS from the General Services Administration are reported by the General Services Administration.

- A 22 percent reduction in energy intensity (defined as energy consumption per square foot of building space) in IRS facilities in Fiscal Year 2012, exceeding the IRS's goal of 21 percent.

- The construction of a new facility in Martinsburg, West Virginia, for the replacement of all mechanical, electrical, and plumbing systems with energy-efficient upgrades for the major equipment associated with these systems.

- Complete renovations at the IRS facility in Andover, Massachusetts, including energy efficiency upgrades such as new lighting, a new geothermal system to heat and cool the entire facility, and right-sizing the facility's data center with best practices implemented as part of the construction effort.

I would be pleased to brief you or members of your staff on this response or any other work under our respective or joint jurisdictions. Please contact me should you have any questions regarding this matter, or have your staff contact Mr. David Holmgren, Deputy Inspector General for Inspections and Evaluations, at (202) 622-6500.

Sincerely,

J. Russell George

J. Russell George
Inspector General

Attachment

Identical letters sent to:

The Honorable Edward J. Markey
The Honorable Benjamin L. Cardin
The Honorable Sheldon Whitehouse

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20005

INSPECTOR GENERAL
FOR TAX
ADMINISTRATION

April 17, 2013

The Honorable Sheldon Whitehouse
Co-Chair
Bicameral Task Force on Climate Change
Committee on Natural Resources
SH-717 Hart Senate Office Building
Washington, D.C. 20510

Dear Chairman Whitehouse:

This letter and its enclosure responds to your February 25, 2013, request for information concerning the Internal Revenue Service's (IRS) efforts to confront the growing threat of climate change. We gathered data about the IRS's relevant programs and operations related to climate change and coordinated our efforts with the Treasury Inspector General, who received a similar request and has the oversight responsibility for the U.S. Department of the Treasury (hereafter referred to as the Department).

In preparing this response, we (1) reviewed applicable statutes, Executive orders, policy, and guidance relevant to addressing the threat of climate change; (2) requested, obtained, and reviewed other relevant information and documentation from the IRS; and (3) interviewed Department and IRS officials responsible for addressing the growing threat of climate change. As a courtesy, we provided IRS officials with a draft of this letter and its enclosure and considered their comments as we prepared the final document.

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I would be pleased to brief you or members of your staff on this response or any other work under our respective or joint jurisdictions. Please contact me should you have any questions regarding this matter, or have your staff contact Mr. David Holmgren, Deputy Inspector General for Inspections and Evaluations, at (202) 622-6500.

Sincerely,

J. Russell George

J. Russell George
Inspector General

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The Honorable Henry A. Waxman
The Honorable Benjamin L. Cardin
The Honorable Edward J. Markey

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20005

INSPECTOR GENERAL
FOR TAX
ADMINISTRATION

April 17, 2013

The Honorable Edward J. Markey
Co-Chair
Bicameral Task Force on Climate Change
Committee on Natural Resources
2108 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Markey:

This letter and its enclosure responds to your February 25, 2013, request for information concerning the Internal Revenue Service's (IRS) efforts to confront the growing threat of climate change. We gathered data about the IRS's relevant programs and operations related to climate change and coordinated our efforts with the Treasury Inspector General, who received a similar request and has the oversight responsibility for the U.S. Department of the Treasury (hereafter referred to as the Department).

In preparing this response, we (1) reviewed applicable statutes, Executive orders, policy, and guidance relevant to addressing the threat of climate change; (2) requested, obtained, and reviewed other relevant information and documentation from the IRS; and (3) interviewed Department and IRS officials responsible for addressing the growing threat of climate change. As a courtesy, we provided IRS officials with a draft of this letter and its enclosure and considered their comments as we prepared the final document.

Based on our review of relevant documents and interviews, we found that while much of the climate change policy and subsequent annual reporting is centralized at the departmental level, the IRS's size makes it a significant contributor to the Department's performance in reaching its energy and environmental goals, including those related to climate change. For example, 3,059 (86 percent) of the Department's 3,569 vehicles are owned or operated by the IRS. Furthermore, IRS facilities account for 15 (58 percent) of the 26 facilities for which the Department reports environmental and energy progress.[1]

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- Complete renovations at the IRS facility in Andover, Massachusetts, including energy efficiency upgrades such as new lighting, a new geothermal system to heat and cool the entire facility, and right-sizing the facility's data center with best practices implemented as part of the construction effort.

I would be pleased to brief you or members of your staff on this response or any other work under our respective or joint jurisdictions. Please contact me should you have any questions regarding this matter, or have your staff contact Mr. David Holmgren, Deputy Inspector General for Inspections and Evaluations, at (202) 622-6500.

Sincerely,

J. Russell George

J. Russell George
Inspector General

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Identical letters sent to:

The Honorable Henry A. Waxman
The Honorable Benjamin L. Cardin
The Honorable Sheldon Whitehouse

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20005

INSPECTOR GENERAL
FOR TAX
ADMINISTRATION

April 17, 2013

The Honorable Benjamin L. Cardin
Co-Chair
Bicameral Task Force on Climate Change
Committee on Natural Resources
SH-509 Hart Senate Office Building
Washington, D.C. 20510

Dear Chairman Cardin:

This letter and its enclosure responds to your February 25, 2013, request for information concerning the Internal Revenue Service's (IRS) efforts to confront the growing threat of climate change. We gathered data about the IRS's relevant programs and operations related to climate change and coordinated our efforts with the Treasury Inspector General, who received a similar request and has the oversight responsibility for the U.S. Department of the Treasury (hereafter referred to as the Department).

In preparing this response, we (1) reviewed applicable statutes, Executive orders, policy, and guidance relevant to addressing the threat of climate change; (2) requested, obtained, and reviewed other relevant information and documentation from the IRS; and (3) interviewed Department and IRS officials responsible for addressing the growing threat of climate change. As a courtesy, we provided IRS officials with a draft of this letter and its enclosure and considered their comments as we prepared the final document.

Based on our review of relevant documents and interviews, we found that while much of the climate change policy and subsequent annual reporting is centralized at the departmental level, the IRS's size makes it a significant contributor to the Department's performance in reaching its energy and environmental goals, including those related to climate change. For example, 3,059 (86 percent) of the Department's 3,569 vehicles are owned or operated by the IRS. Furthermore, IRS facilities account for 15 (58 percent) of the 26 facilities for which the Department reports environmental and energy progress.[1]

The IRS reported the following recent accomplishments, among others, to the Department:

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Letter to the Honorable Benjamin L. Cardin
April 17, 2013
Page Two

- A 22 percent reduction in energy intensity (defined as energy consumption per square foot of building space) in IRS facilities in Fiscal Year 2012, exceeding the IRS's goal of 21 percent.

- The construction of a new facility in Martinsburg, West Virginia, for the replacement of all mechanical, electrical, and plumbing systems with energy-efficient upgrades for the major equipment associated with these systems.

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I would be pleased to brief you or members of your staff on this response or any other work under our respective or joint jurisdictions. Please contact me should you have any questions regarding this matter, or have your staff contact Mr. David Holmgren, Deputy Inspector General for Inspections and Evaluations, at (202) 622-6500.

Sincerely,

J. Russell George

J. Russell George
Inspector General

Attachment

Identical letters sent to:

The Honorable Henry A. Waxman
The Honorable Edward J. Markey
The Honorable Sheldon Whitehouse

Attachment

Bicameral Task Force on Climate Change Questions – Part 1

(1) Identify the existing requirements in legislation, regulation, Executive Order, and other directives that apply to the Internal Revenue Service (IRS).

We identified the following requirements to address climate change applicable to the IRS in statute, Executive Order, implementing guidance, and U.S. Department of the Treasury (hereafter referred to as the Department) policy:

- The Energy Independence and Security Act of 2007 (EISA), Pub. L. No. 110-140.
- Exec. Order No. 13,423, *Strengthening Federal Environmental, Energy, and Transportation Management*, 3 C.F.R. 193 (2007).
- Treasury Directive 75-09, Environmental Management and Sustainability Program.
- Exec. Order No. 13,514, *Federal Leadership in Environmental, Energy, and Economic Performance*, 3 C.F.R. 248 (2009).
- Chair of the Council on Environmental Quality (CEQ), *Federal Agency Climate Change Adaptation Planning Implementing Instructions*, (Mar. 2011).
- Department of the Treasury, *Policy Statement for Climate Change Adaptation*, (Jun. 2012).

(2) Assess whether the IRS is meeting these requirements.

The IRS reports that it is meeting the requirements addressing climate change set forth in EISA, Exec. Order 13423, Exec. Order 13514, CEQ guidance, and Department policy. Much of the climate change policy and subsequent annual reporting is centralized at the departmental level with the IRS reporting its performance in reaching energy and environmental goals to the Department (including those related to climate change). The Department then aggregates this information from all of its bureaus and reports the results at the agency level.

Specifically, the IRS provided input on the Treasury Strategic Sustainability Performance Plan (Sustainability Plan) which includes an appendix entitled *Climate Change Adaptation Plan: U.S. Department of the Treasury*, issued in June 2012. In the Sustainability Plan, the Department addressed its efforts to achieve environmental, economic, and energy goals mandated in Exec. Order 13514 and prioritized actions based on a positive return on investment.

One such way that the Department reports its progress in meeting these goals is through the Office of Management and Budget Scorecard on Sustainability/Energy. The Scorecard covers seven key areas including greenhouse gas emissions, reductions in

Attachment

energy intensity, the use of renewable energy, reductions in water usage, reductions in fleet petroleum usage, and use of sustainable green buildings. Some of the results that the IRS reported, which contribute to the Department's overall goals, include:

- A 22 percent reduction in energy intensity (defined as energy consumption per square foot of building space) in IRS facilities for Fiscal Year 2012, exceeding the IRS's goal of 21 percent.
- The construction of a new facility in Martinsburg, West Virginia, for the replacement of all mechanical, electrical, and plumbing systems with energy efficient upgrades for the major equipment associated with these systems.
- Complete renovations at the IRS facility in Andover, Massachusetts, including energy efficiency upgrades such as new lighting, a new geothermal system to heat and cool the entire facility, and right-sizing the facility's data center with best practices implemented as part of the construction effort.
- The purchase of 12 percent of their electricity from renewable sources, exceeding their goal of five percent.
- The IRS purchase of renewable energy credits at the headquarters level to exceed the goals set forth. Two facilities (Andover, Massachusetts, and Washington, D.C.) purchased electricity through the General Services Administration aggregate contracts, which included the requirement that five percent of the electricity is from renewable sources.
- The development of Water Management Plans at all IRS sites to incorporate the 10 Best Management Practices. Nearly all sites have installed devices to reduce water consumption in restrooms.

(3) If the IRS is not fully meeting the requirements, make recommendation for improving its performance.

Based on the information we have gathered, we have no recommendations for the IRS.

Bicameral Task Force on Climate Change Questions – Part 2

(1) The authorities the IRS has to reduce emissions of heat-trapping pollution.

We identified authorities applicable to the IRS in Part 1 of this request. We did not identify any other authorities IRS may exercise to reduce emissions from heat-trapping pollution beyond its internal operations in the United States.

Attachment

(2) Authorities to make the Nation more resilient to the effects of climate change.

As noted in our response above, there were no authorities separate from those identified in Part 1 of this request. While the IRS does not have specific authorities unique to itself to effect climate change, it does have a role in helping to administer some legislative efforts to address climate change through tax provisions. Recent examples of this role include administering the residential energy credit, plug-in electric vehicle credit, and alternative motor vehicle credit contained in the American Recovery and Reinvestment Act of 2009 (Pub. L. No. 111-5).

(3) The most effective additional steps the IRS could take to reduce emissions or strengthen resiliency.

The IRS officials we interviewed did not offer any additional steps that the IRS or Department could take to reduce emissions or strengthen resiliency outside the recommended next steps in the CEQ Progress Report. Based on our understanding of IRS's mission and authorities, we did not separately identify additional steps that the IRS could be taking at this time.