

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



# 2014 - Climate Change Adaptation Plan

October 2014

*a New Day for Federal Service*



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## **1 Executive Summary**

The U.S. Office of Personnel Management (OPM) recognizes the effect from climate change is one of the major challenges of the 21st century. As we act to curtail the carbon pollution that is driving climate change, we must also prepare for the impacts that are too late to avoid. OPM understands certain aspects of its operations and mission can be impacted by changes in regional climate conditions throughout the United States. OPM has taken a comprehensive approach to climate change that incorporates new knowledge and changing conditions into our mission, facility operations, and programs. This approach will augment our resilience to changing climate.

Our goal is to develop practical, nationally consistent, lawfully justifiable, and cost effective measures, both structural and nonstructural, to reduce vulnerabilities to climate change. We are taking a collaborative approach that embodies a new attitude to partnering between agencies. This collaboration takes advantage of our different perspectives and expertise so our progress on adaptation reflects the best available and actionable science. We have taken a phased approach that allows us to identify uncertainties, whether in climate projections or in systems responses, so we may begin adaptation in areas where uncertainties are relatively smaller and the risk of adverse or unintended consequences is lower. We have incorporated climate change into our organizational plans, policies, operations and programs in parallel, rather than sequentially, so adaptation begins soonest for the most vulnerable. We are refining our adaptation based on the new knowledge.

## **2 Background**

The OPM Climate Change Adaptation Plan is in response to Executive Order (E.O.) 13653 – Preparing the United States for the Impacts of Climate Change; E.O. 13514 – Federal Leadership in Environmental, Energy, and Economic Performance; information requested by the Council on Environmental Quality in its Implementing Instructions for Federal Agency Climate Change Adaptation issued on March 4, 2011; and E.O. – 13653 Implementation Guidance issued December 19, 2013.

The Plan provides details on current and continuous adaptation planning and implementation progress. We believe the scope, collaboration, and resources applied to climate change adaptation planning demonstrate the importance OPM has placed on this critical challenge in the short and long-term sustainability of our mission, programs and operations.

## **3 Introduction**

The mission of the OPM is to recruit, retain, and honor a world-class workforce to serve the American people. OPM fulfills its mission by providing relevant and timely products and superior customer service that reflects its commitment to collaboration and the highest standards of quality.

OPM's programs primarily involve managing personnel-related processes and offering knowledge-based services to other agencies, as well as administering Federal retirement benefits and background investigations. An integral function of the Agency is advising the Federal Government regarding the Federal operating status in the event of inclement weather or other crises in the Washington, D.C. metro area (in other regions, decisions are normally managed by the affected agencies based on enhanced communication, coordination and collaboration with their local Federal Executive Board). While OPM owns no facilities, it leases 65 facilities from the General Services Administration (GSA). GSA has given OPM "Delegation of Authority" to manage 3 of these facilities: OPM headquarters in Washington, D.C., the Theodore Roosevelt Building (TRB); a facility in Macon, Georgia that houses a data center and information technology support operations; and the Federal Executive Institute (FEI) training facility in Charlottesville, Virginia.

OPM is not involved in agriculture, energy production, land management, or many of the other sectors that may be directly and extensively impacted by climate change. Consequently, OPM's vulnerabilities lie predominantly in management of its 3 delegated leased facilities and its preparation for weather-related crises affecting the Federal Government's operating status. These delegated leased facilities are not in areas projected to see permanent flooding from sea level rise but operations depend heavily on public infrastructure. The TRB has been identified as a "mission critical" facility based on results of risk analysis.

## **4 Planning Requirements**

### **4.1 Planning for Climate Change Related Risk**

Throughout the United States and the world, we have experienced and will continue to experience the effects of climate change. Climate change impacts include extreme heat and precipitation events, numerous and intense wildfires, increased snowpack in some geographical areas and a reduction in others, increasing ocean temperatures, loss of sea ice, and rising sea levels, among others. Climate variability and climate change will affect a range of Agency services, operations, and programs. A changing climate will also result in potential financial, operational, social, and environmental risks and opportunities across diverse industries and sectors at local, regional, national, and international levels, affecting the Agency's partners and the customers it serves.

In response to the *Implementation Instructions* requirements for E.O. 13514<sup>1</sup> and the adaptation plan guidance issued by the Council on Environmental Quality (CEQ) in 2012<sup>2</sup>, OPM formed an

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<sup>1</sup> Implementation Instructions requirements for E.O. 13514  
[http://www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation\\_final\\_implementing\\_instructions\\_3\\_3.pdf](http://www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation_final_implementing_instructions_3_3.pdf)

<sup>2</sup> CEQ. Federal Agency Climate Change Adaptation Planning: Implementing Instructions, March 4, 2011.  
[http://www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation\\_final\\_implementing\\_instructions\\_3\\_3.pdf](http://www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation_final_implementing_instructions_3_3.pdf)

internal Climate Change Adaptation Work Group, which also collaborated with external workgroups to better understand the potential impacts from climate change. One of the actions taken by OPM's Climate Change Adaptation Work Group was conducting a high level vulnerability assessment, which was completed in FY13. The results indicated parts of the Agency's infrastructure and facilities operation can be directly affected by the impacts of climate change. For example, extreme temperatures will increase heating and cooling loads on building systems. More frequent and severe precipitation and storms will increase potential risks of temporary flooding and inundation. By accounting for the effects of a changing climate through a more comprehensive approach to facilities planning and operation, the Agency can reduce, and in some cases avoid, impacts on property. This translates into future cost-savings since expensive repairs or replacement of facilities could be minimized. In addition, proactive facilities planning will reduce potential impacts on the health and safety of the Agency's employees and its ability to accomplish its mission.

Consistent with Section 5(a) of E.O. 13653, OPM has integrated consideration of climate adaptation into operations and overall mission objectives as it continues to build on the foundation for coordinated action on climate change preparedness and resilience across the Federal Government established by E.O. 13514. In an effort to reduce the potential impacts and increase resilience from the effects of climate change, OPM has integrated the findings derived from the associated risk assessment into agency related plans, policies and programs. In February 2014, the Agency's emergency preparedness plans were updated as part of its annual review to account for emergencies due to extreme weather related events. Additionally, in preparing to respond immediately to an emergency, whether natural or man-made, the Director of OPM issued an updated *2013-2014 Federal Dismissal and Emergency Procedures*<sup>3</sup> for the Washington, D.C. area. These actions addressed both the near-term and long-term vulnerabilities locally and regionally.

#### **4.2 Programs, Policies and Plans**

On September 14, 2011, the OPM Senior Sustainability Officer signed an agency Policy Directive, "Addressing Climate Change Impacts at the Agency in Operations and Programs." The Policy Directive states "[i]t is the policy of the Agency to undertake comprehensive climate change adaptation planning in order to ensure that the Agency fulfills its mission and maintains its programs and operations in a changing climate." It requires operating units to "consider current and projected climate change impacts when undertaking planning, and making decisions regarding the Agency's resources, programs, policies, and operations," and noted that "as the Agency moves forward with its climate change adaptation planning, it shall apply the

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<sup>3</sup> 2013-2014 Federal Dismissal and Emergency Procedure (<http://www.opm.gov/policy-data-oversight/pay-leave/reference-materials/handbooks/dcdismisssal.pdf>)

guiding principles and planning framework for climate change adaptation found in the 2010 Interagency Climate Change Adaptation Task Force Report<sup>4</sup>.”

The Policy Directive also established a Climate Change Adaptation Work Group to lead development of a Climate Change Adaptation Plan, which analyzes the Agency’s vulnerability to climate change and identifies priority climate change adaptation actions the Agency will take to improve its resilience.

In an effort to manage climate risks in the near-term and build resilience in the short and long-term, the Work Group also ensures the adaptation plan is aligned with other OPM policies, plans, and strategies, as appropriate. The plans and policies include:

*Strategic Sustainability Performance Plan* commits OPM to meet or exceed statutory, regulatory and administrative requirements related to our environmental performance. It is the policy of OPM that all business and operations be conducted with the least environmental impact possible and that energy and resource efficiency be an agency priority. Due to OPM’s unique role in affecting the work habits of Federal employees, work in this area will be particularly geared toward increasing employee education in sustainability and leveraging flexible work environments to enhance environmental performance. OPM recognizes sustainability as an opportunity to make its operations more efficient and robust.

*Continuity of Operations Plan (COOP)* is an effort within OPM to ensure it can continue to perform its Mission Essential Functions (MEFs) to support the Federal workforce during a wide range of emergencies, including acts of nature, accidents, and technological or attack-related emergencies.

*Devolution Plan* capability is an integral part of Continuity of Operations. Devolution is the process in which, due to extraordinary circumstances, OPM’s senior staff (including the Director), are unavailable to perform their normal duties. During the 2014 Eagle Horizon continuity exercise, OPM and the Federal Emergency Management Agency (FEMA) examined what would happen if a region-wide incident rendered the Theodore Roosevelt Building (OPM’s headquarters) uninhabitable and senior staff incapable of performing OPM’s primary mission essential functions. OPM staff previously identified as members of the Devolution Emergency Response Group (DERG) carried out the primary mission essential functions to exercise and examine how OPM would continue to operate under these severe conditions.

Although no agency is fully prepared for every possible emergency or threat, the DERG members worked through this scenario providing valuable insight into OPM’s capabilities, noting strengths and areas for improvement. The results of the exercise should better

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<sup>4</sup> 2010 Interagency Climate Change Adaptation Task Force Report(<http://www.whitehouse.gov/sites/default/files/microsites/ceq/Interagency-Climate-Change-Adaptation-Progress-Report.pdf>)

position OPM to perform its MEFs during crisis situations, whether they are manmade, natural, technological or national security emergencies.

*Reconstitution Plan* is restoring OPM's ability to carry out all aspects of normal operations, the restoration of the capabilities that existed prior to the emergency. Reconstitution may not be an exact replacement of lost facilities, equipment, or restorations of processes. The goal of reconstitution is to reestablish the capability in the most efficient manner. This may mean a change in geographic location, business practice, or the type of technology used to meet the requirement. The sequence of events resulting in COOP activation and its aftermath could cause changes in the development of a Reconstitution Plan. The plan is situation-dependent and will continue to be revised as more information is received by the OPM Reconstitution Team over the course of the event.

*Sustainable design* seeks to reduce negative impacts on the environment, and the health and comfort of building occupants thereby improving building performance. The basic objectives of sustainability are to reduce consumption of non-renewable resources, minimize waste, and create healthy, productive environments. It is the policy of OPM that climate change adaptation planning and the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings are considered when acquiring new leases.

#### **4.3 Identified Climate Change Related Risk to Mission**

OPM's programs chiefly involve managing personnel-related processes and offering knowledge-based services to other agencies, as well as administering Federal retirement benefits and background investigations. Advising the Federal government regarding operating status in the event of inclement weather or crisis in the D.C. metro area is one of the functions most likely to be affected by climate change in the near and long term. Other reasonably foreseeable potential impacts from climate change may be related to facilities' operations caused by overwhelmed utilities' infrastructure.

OPM is not involved in agriculture, energy production, land management, or many of the other sectors that may be directly and extensively impacted by climate change. Consequently, OPM's vulnerabilities lie predominantly in management of its 3 delegated leased buildings, preparing for weather-related crises affecting the government's operating status and health and safety of employees. The need to better understand and respond in an informed manner to changes in the pattern and intensity of extreme weather events is based on well needed regional climate information, decision support tools, and resources.

#### **4.4 Improving Climate Adaptation and Resilience**

As better scientific data and tools regarding climate change become available, the Agency responds accordingly in an effort to improve climate adaptation and resilience.

Currently, OPM:

- A. Ensures policies on agency operating status (e.g., D.C. office closures/delayed arrivals) take into account impacts on employee health and safety.
- B. Ensures employees are telework-ready to respond to emergency closures. Federal telework programs are established primarily to meet agency mission and operational needs. Telework saves money by helping the government reduce real estate and energy costs and promote management efficiencies; and makes us more resilient in severe weather and other emergencies. The OPM telework policy is consistent with The Telework Enhancement Act of 2010<sup>5</sup>.
- C. Ensures policy on agency leasing of real property is established. All leasing is done through GSA and incorporates the Realty Services Letter, RSL-2007-12, Green Lease Policies and Procedures for Lease Acquisition and RSL-2010-2, Energy Star® Requirement for Lease Acquisition, and LAC 2011-13, Sustainability update. OPM's leasing policy is reviewed and updated annually by the Facilities, Security and Contracting office.
- D. Plans to install additional redundant power at its headquarters building in order to support critical systems. This is in an effort to lessen the risks of power loss and improve reliability of its operation due to the potential impacts from climate change.

OPM has not completed a cost and benefit analysis of the above mentioned improvements nor has the Agency formally determined whether and how climate change adaptation and resilience efforts should be included in procurement and acquisition decisions.

#### **4.5 OPM's Interagency Efforts to Support Climate Preparedness and Resilience**

OPM continues to coordinate with interagency groups, other Federal agencies and regional bodies such as the Federal Adaptation Community of Practice, Agency Adaptation Working Group, Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Federal Protective Service (FPS), Maryland Area Transportation Operations Center, Washington Metropolitan Area Transit Authority (WMATA), and Metropolitan Washington Council of Governments (MWCOG) on planning for response to emergencies including extreme weather events. OPM participates in annual Continuity of Government exercise and quarterly MWCOG meetings. During the past few years, OPM has consulted with an interagency working group of human resources specialists, Chief Human Capital Officers (CHCOs), and national

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<sup>5</sup> Telework Enhancement Act of 2010 ([http://www.telework.gov/Telework\\_Enhancement\\_Act/](http://www.telework.gov/Telework_Enhancement_Act/))

labor organizations to ensure our Washington, D.C., Area Dismissal and Closure Procedures<sup>6</sup> reflect the needs of the human resources community. These preparedness Procedures are based on the principle that the Federal Government's vital business must continue without compromising the safety of its employees and the general public in responding immediately to emergencies. This year, OPM's primary goal is to make sure agencies are aware of OPM's Procedures and that the agencies continue to develop and communicate their policies associated with the Procedures to make the best use of all available human resources tools in the event of an emergency. Over the past few winters, unscheduled telework has become a standard human resources tool in the Procedures. It is a product of the Telework Enhancement Act of 2010<sup>5</sup>, which requires all agencies incorporate telework into their Continuity of Operations Plans.

While the operating status of the Federal Government in the Washington, D.C., area can be found at <http://www.opm.gov/policy-data-oversight/snow-dismissal-procedures/current-status>, Federal employees in geographic areas outside of the Washington, D.C., area should check with their own agency regarding the operating status of their duty station.

OPM's operating status announcements are only effective if each employee understands what the announcement means and how to react. OPM provides the announcement that must be accompanied by specific agency procedures, as reflected in employee telework agreements, and/or collective bargaining agreements.

Consistent with the E.O. 13514, OPM will report on progress made on its Adaptation Plan as well as any updates made to the plan through the annual Strategic Sustainability Performance Plan. Additional updates will follow based on the requirements of Section 5(b) of E.O. 13653.

## **5 Modernizing Federal Programs and Policies to Support Climate Resilient Investment**

OPM's primary role is to provide human resources, leadership, and support to Federal agencies and help the Federal workforce achieve their aspirations as they serve the American people. OPM oversees all policy created to support Federal human resources departments — from classification and qualifications systems to hiring authorities and from performance management to pay, leave, and benefits. Along with making those policies, OPM is responsible for ensuring they are properly implemented and continue to be correctly carried out. OPM does not provide grants, loans, investment and incentives to recipients nor identified any barriers or other actions that may impact the increase in the Nation's resilience to climate change. However, as part of an ongoing action, and as new technologies and tools become available, OPM will continue to improve its adaptation planning.

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<sup>6</sup> Washington, DC, Area Dismissal and Closure Procedures document (<http://www.opm.gov/policy-data-oversight/pay-leave/reference-materials/handbooks/dcdismisal.pdf>)