



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

# **NATIONAL PARK SERVICE: CLIMATE FRIENDLY PARKS INITIATIVE**




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.

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## 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.

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# 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)<sup>1</sup> 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.<sup>2</sup>

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<sup>1</sup> 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.

<sup>2</sup> U.S. Department of the Interior, Strategic Sustainability Performance Plan, June 2, 2010

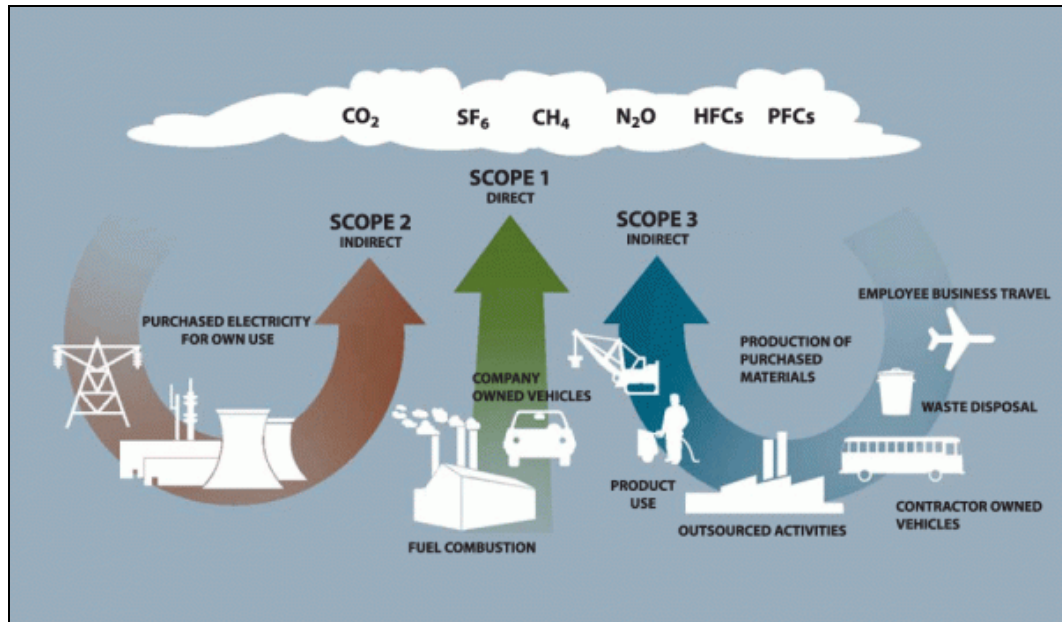


Figure 1. Sources of Scopes 1, 2, and 3 for greenhouse gas. The visual representation above is as follows: Scope 1 includes emissions from sources that are owned or controlled by the Government and Scope 2 includes emissions resulting from energy purchased by Federal agencies. Scope 3 includes emissions 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.



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## 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

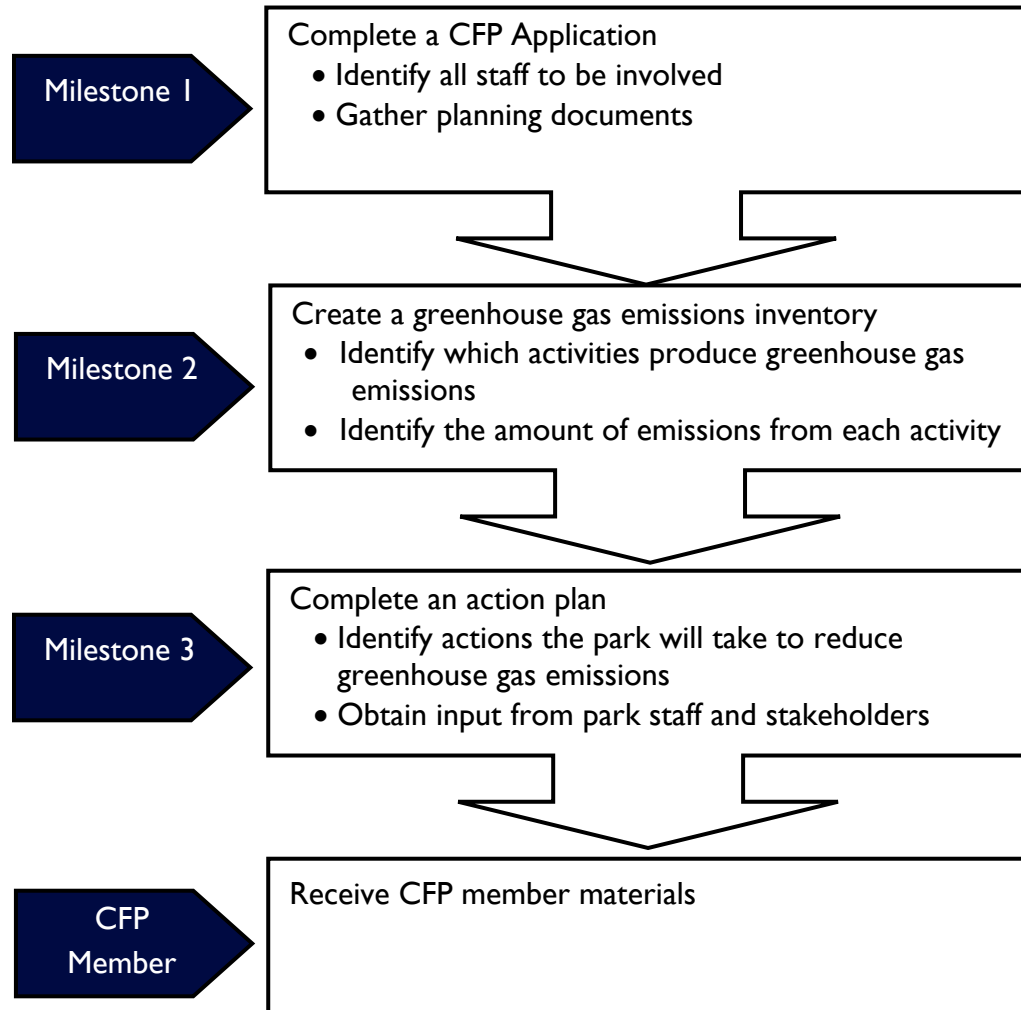


Figure 2. This flowchart illustrates the general process of becoming a CFP member.

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

- I. 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.

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*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' baseline 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.

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*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.<sup>3</sup> 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.

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<sup>3</sup> 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.

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# 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.

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# Appendix I: 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.



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## 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

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## **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 13 2011

### Memorandum

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

From: Director *Jonathan S. Garvin*

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 Vera Washington, NPS GAO/OIG Audit Liaison Officer, at 202-354-1960.

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## Appendix 4: Status of Recommendations

Recommendation	Status	Action Required
I, 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.



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