



OFFICE OF INSPECTOR GENERAL
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
CONSUMER FINANCIAL PROTECTION BUREAU
WASHINGTON, DC 20551

October 29, 2013

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

Dear Ranking Member Waxman:

This letter is in response to the February 25, 2013, letter from the Bicameral Task Force on Climate Change (Task Force), which requested that the Office of Inspector General review how the entities we oversee are confronting climate change. As the Office of Inspector General of the Consumer Financial Protection Bureau (CFPB), we provided an initial response to the Task Force's letter on March 28, 2013, and this letter is our final response.

The first part of the Task Force's letter requested that we (1) identify the existing requirements in legislation, regulation, executive order, and other directives that apply to the CFPB; (2) assess whether the CFPB is meeting these requirements; and (3) make recommendations for improving the CFPB's performance if it is not fully meeting the requirements. The second part of the letter requested our assessment of (1) the authorities the CFPB has to reduce emissions of heat-trapping pollution, (2) the CFPB's authorities to make the nation more resilient to the effects of climate change, and (3) the most effective additional steps the CFPB could take to reduce emissions or strengthen resiliency.

In our initial response, we explained that we forwarded your request to the CFPB for its opinion on the applicability of federal climate change requirements and the status of its compliance with those applicable requirements. The CFPB's Legal Division is responsible for determining the federal climate change requirements to which the CFPB is subject. We have summarized the CFPB's response to our inquiry below. We provided CFPB officials with a draft of this letter and considered their comments as we prepared the final document.

The CFPB's Responses to Part 1 of the Request

(1) Identify the existing requirements in legislation, regulation, executive order, and other directives that apply to the CFPB.

The CFPB's Legal Division identified four requirements that apply to the agency.

- Energy Independence and Security Act of 2007—Congress enacted the Energy Independence and Security Act of 2007 to move the United States toward greater energy independence and security; to increase the production of clean renewable fuels; to protect consumers; to increase the efficiency of products, buildings, and vehicles; to promote research on and deploy greenhouse gas capture and storage options; to improve the energy performance of the federal government; and for other purposes.
- Energy Policy Act of 2005—Congress enacted the Energy Policy Act of 2005 to ensure jobs for our future with secure, affordable, and reliable energy.
- Executive Order 13514—The President released Executive Order 13514 in October 2009 to establish an integrated strategy toward sustainability in the federal government and to make reduction of greenhouse gas emissions a priority for federal agencies.
- Executive Order 13423—The President released Executive Order 13423 in January 2007 to strengthen the environmental, energy, and transportation management of federal agencies.

(2) Assess whether the CFPB is meeting the requirements in (1) above.

CFPB officials described the climate change initiatives it has taken to comply with applicable climate change requirements identified in (1) above.

- The CFPB is pursuing the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold certification for the renovation of its headquarters building.¹

1. The LEED 2009 Green Building Rating System for New Construction and Major Renovations is a set of performance standards for certifying the design and construction of commercial or institutional buildings and high-rise residential buildings. The intent is to promote healthful, durable, affordable, and environmentally sound practices in building design and construction.

- The CFPB leases two bi-fuel vehicles from the General Services Administration Fleet.²
- The CFPB has established a Green Team to promote an environmentally friendly culture, including paperless presentations, low-ink printing, and recycling.

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

Based on (2) above, we do not have any recommendations for the CFPB regarding the requirements in (1) above. We recognize the financial and environmental risks that climate change poses to the federal government, and we will consider additional reviews of the CFPB's climate change initiatives during our annual planning process.

The CFPB's Responses to Part 2 of the Request

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

The CFPB did not identify any authorities it has to reduce emissions from heat-trapping pollution.

(2) The CFPB's authorities to make the Nation more resilient to the effects of climate change.

The CFPB did not identify any authorities it has to make the nation more resilient to the effects of climate change.

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

The CFPB did not identify any additional steps that it could take to reduce emissions or strengthen resiliency. We did not conduct a review that would separately identify any additional steps that the CFPB could be taking at this time.

2. The General Services Administration Fleet provides vehicles and fleet management services to participating federal agencies. The General Services Administration offers bi-fuel alternative fuel vehicles, which have two separate fuel systems: one for an alternative fuel and one for gasoline.

Thank you for your interest in the work of the Office of Inspector General. If you have questions on this or any other matter, please contact me at 202-973-5005 or John Manibusan, Assistant Congressional and Media Liaison, at 202-973-5043. We are providing similar letters to the other Co-Chairs of the Task Force.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Bialek". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Bialek".

Mark Bialek
Inspector General