

Environmental Data & Governance Initiative Website Monitoring Report

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Removal from the Greening EPA Website of a Climate Change Adaptation Web Resource, Links to Resources, and Mentions of EPA's Own Greening Performance Goals

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Writing and review of this report was conducted and overseen by the members of EDGI's Website Monitoring Committee: Andrew Bergman, Gretchen Gehrke, and Toly Rinberg. Report writing was led by Marcy Beck.

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Removal from the Greening EPA Website of a Climate Change Adaptation Web Resource, Links to Resources, and Mentions of EPA's Own Greening Performance Goals

Overview

The Environmental Protection Agency (EPA) Greening EPA website has been altered to remove access to Web resources on climate change adaptation, and to remove wording related to EPA's own goals for climate change resilience and adaptation. An EPA statement on climate change adaptation and a link to the Statement have been entirely removed. Links to EPA's Climate Change Adaptation Plans have been removed from at least two pages on the EPA website. References to EPA's federal leadership and goals to cover 100 percent of its own electricity use nationwide through purchasing renewable energy have also been removed.

Description

The <u>Greening EPA website</u> reports EPA's activities to implement "strategies to reduce the environmental impact of our facilities and operations across the country" at over 40 locations. In late September 2017, Greening EPA pages were altered to remove links to EPA's Climate Change Adaptation Plans and to EPA's Policy Statement on Climate Change Adaptation. While the Climate Change Adaptation Plans themselves are still hosted on the Greening EPA website, access to them has been reduced. Language around EPA's Strategic Sustainability Plans has changed, including the removal of EPA's stated broad goal of "Climate change resilience", and a more specific goal to purchase renewable energy to cover 100 percent of its nationwide electricity use.

Note: Access to the Climate Change Adaptation Plans on another part of the EPA's website has also been reduced, as reported by <u>E&E News</u>, and confirmed by EDGI's Website Monitoring Team (see "Confirmed changes" section below).

The most notable changes to the Greening EPA webpages are summarized here:

- 1. Removed link to plans and statement on climate change adaptation
 - a. Removed link that leads to a page hosting EPA's "Climate Change Adaptation Plans" from 2012, 2013, and 2014 (1.1c)
 - b. Removed link "U.S. EPA Policy Statement on Climate-Change Adaptation." The corresponding document is no longer hosted at the link URL and is not available from the <u>January 19 snapshot</u>, but is available on the <u>EPA's Web Archive</u> (1.1d)
- 2. Removed wording related to EPA's own greening performance history, goals and leadership.
 - a. Removed "climate change resilience" as a goal of EPA's Strategic Sustainability Performance Plan (1.1a)

- b. Removed references to EPA's purchase of renewable energy equal to 100 percent of its estimated annual electricity use nationwide (2.1a, 3.1a, 3.1b, 3.1c)
- c. Removed mention of exceeding greenhouse gas emission targets from sources that are owned or directly controlled (4.1b) and sources that are not owned or directly controlled (4.1c) by the EPA. Note: the EPA still appears to be exceeding its greenhouse gas emission targets, based on its own reporting (see additional context provided on Page 4 below).

Confirmed changes

This website monitoring report also confirms a recent online article. In the wake of Hurricane Harvey in September 2017, E&E News (Greenwire)¹ published an article highlighting the relationship between flooded Superfund toxic waste sites in the Houston area and the reduced access to EPA's Climate Change Adaptation Plans. The E&E News article points to a link from EPA's Superfund Climate Adaptation webpage that no longer provides access to a 2014 implementation plan describing vulnerabilities and measures to prepare Superfund sites for climate change. The plan remains unavailable from the Superfund Climate Change Adaptation webpage through the date of this report (Page 5). The "Final OSWER (Office of Solid Waste and Emergency Response) Climate Change Adaptation Implementation Plan" link on EPA's "Superfund Climate Change Adaptation" page, now redirects to EPA's "This page is being updated" notice.

¹ "Missing EPA report warned of flooding at Superfund dumps," Greenwire, September 18, 2017 https://www.eenews.net/stories/1060060957

Detailed Description of Changes

Page 1: EPA Strategic Sustainability Plans

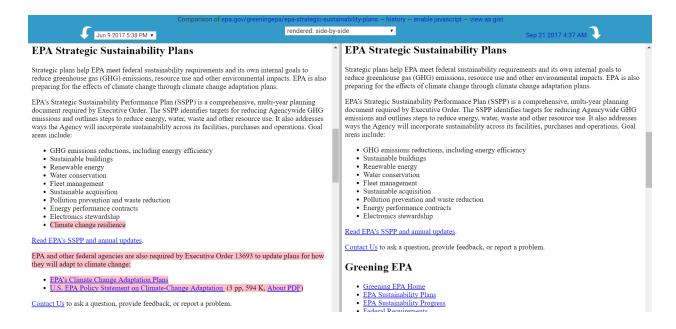
- URL: www.epa.gov/greeningepa/epa-strategic-sustainability-plans
- Side-by-side View: 6/9/2017 9/21/2017
- Changes occurred between Sep 20, 4:39 AM and Sep 21, 4:37 AM ET

Screenshot 1.1

- (1.1a) Removed bullet point "Climate change resilience"
- (1.1b) Removed sentence "EPA and other federal agencies are also required by Executive Order 13693 to update plans for how they will adapt to climate change:"
- (1.1c) Removed link "EPA's Climate Change Adaptation Plans" linking to URL www.epa.gov/greeningepa/climate-change-adaptation-plans
 - URL leads to a live "Climate Change Adaptation Plans" page (November 6, 2017)
- (1.1d) Removed link "U.S. EPA Policy Statement on Climate-Change Adaptation (3 pp, 594 K, About PDF)" linking to URL

https://www3.epa.gov/climatechange/Downloads/impacts-adaptation/adaptation-statemen t-2014.pdf (live on February 19, 2017)

- URL leads to a removed page (October 24, 2017)
- Statement is not archived on the <u>January 19 snapshot</u> (link leads to a removed page outside the snapshot)
- Statement is archived on <u>EPA's Web Archive</u>



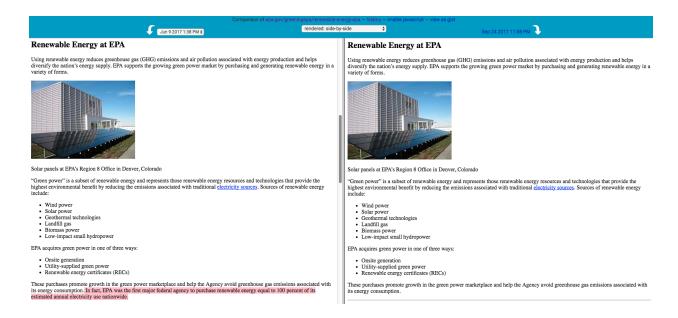
Internet Archive's Wayback Machine: previous version from <u>August 8, 2017</u> and current version from <u>September 30, 2017</u>

Page 2: Renewable Energy at EPA

- URL: https://www.epa.gov/greeningepa/renewable-energy-epa
- Side-by-side View: 6/9/2017 9/24/2017
- Changes occurred between Sep 18, 7:52 PM and Sep 25, 2:58 AM ET

Screenshot 2.1

(2.1a) Removed sentence "In fact, EPA was the first major federal agency to purchase renewable energy equal to 100 percent of its estimated annual electricity use nationwide."



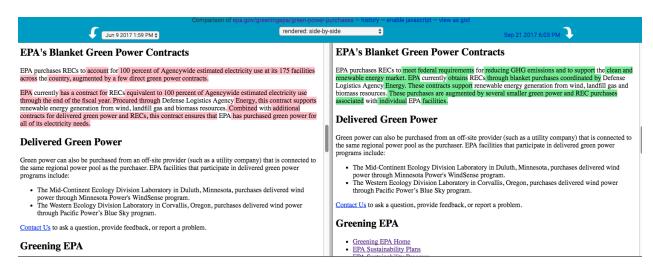
Internet Archive's Wayback Machine: previous version from <u>June 29, 2017</u> and current version from <u>October 17, 2017</u>

Page 3: EPA Green Power Purchases/Renewable Energy Credits (RECs)

- URL: https://www.epa.gov/greeningepa/green-power-purchases
 - URL redirects to: https://www.epa.gov/greeningepa/green-power-purchases-epa
- Side-by-side View: 6/9/2017 9/21/2017
- Changes occurred between Sep 19, 9:42 AM and Sep 21, 9:03 PM ET

Screenshot 3.1

- (3.1a) Changed sentence from "EPA purchases RECs to account for 100 percent of Agencywide estimated electricity use at its 175 facilities across the country, augmented by a few direct green power contracts." to "EPA purchases RECs to meet federal requirements for reducing GHG emissions and to support the clean and renewable energy market." (3.1b) Changed sentences from "EPA currently has a contract for RECs equivalent to 100 percent of Agencywide estimated electricity use through the end of the fiscal year. Procured through Defense Logistics Agency Energy, this contract supports renewable energy generation from wind, landfill gas and biomass resources." to "EPA currently obtains RECs through blanket purchases coordinated by Defense Logistics Agency Energy. These contracts support renewable energy generation from wind, landfill gas and biomass resources."
- (3.1c) Removed sentence "Combined with additional contracts for delivered green power and RECs, this contract ensures that EPA has purchased green power for all of its electricity needs."
- (3.1d) Added sentence "These purchases are augmented by several smaller green power and REC purchases associated with individual EPA facilities."



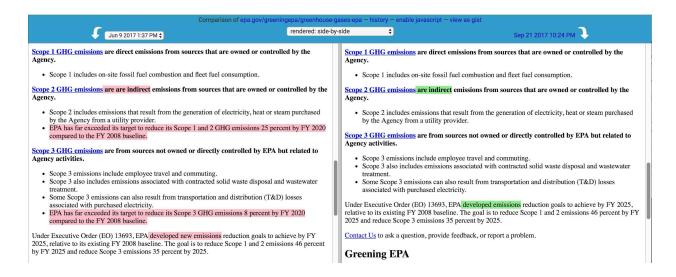
Internet Archive's Wayback Machine: previous version from <u>July 7, 2017</u> and current version from <u>November 6, 2017</u>

Page 4: Greenhouse Gases at EPA

- URL: https://www.epa.gov/greeningepa/greenhouse-gases-epa
- Side-by-side View: 6/9/2017 9/21/2017
- Changes occurred between Sep 19, 4:05 PM and Sep 21, 1:24 AM ET

Screenshot 4.1

- (4.1a) Removed extraneous "are" from phrase "Scope 2 GHG emissions are are indirect emissions"
- (4.1b) Removed bullet point "EPA has far exceeded its target to reduce its Scope 1 and 2 GHG emissions 25 percent by FY2020 compared to the FY2008 baseline."
 - For context, compare the changed "Scope 1 and 2 Greenhouse Gas Emissions Results" page from July 7, 2017 and December 6, 2017.
- (4.1c) Removed bullet point "EPA has far exceeded its target to reduce its Scope 3 GHG emissions 8 percent by FY2020 compared to the FY2008 baseline."
 - For context, compare the changed "Scope 3 Greenhouse Gas Emissions Results" page from <u>January 26, 2017</u> and <u>December 6, 2017</u>
- (4.1d) Removed word "new" from the phrase "developed new emission reduction goals."



Internet Archive's Wayback Machine: previous version from <u>August 8, 2017</u> and current version from <u>September 30, 2017</u>

Additional Information on Access to EPA's Climate Change Adaptation Plan

While several EPA climate change adaptation documents highlighted in this report are still available on the EPA website, including the Greening EPA website, link and webpage removals have significantly reduced access to each. In addition to the removed link to the "EPA's Climate Change Adaptation Plans" from a webpage on the Greening EPA website detailed on Page 1, the link on another EPA page, titled "Superfund Climate Change Adaptation," currently does not lead to the Climate Change Adaptation Plan. See details below:

Page 5: Superfund Climate Change Adaptation

- URL: https://www.epa.gov/superfund/superfund-climate-change-adaptation
- EPA's Web archive: January 19 snapshot
- This page has not changed between April 27, 2017 and November 19, 2017
 - This report does not explore changes to this page prior to April 27, 2017

Page 5 Details

- Under the section "Climate Change Adaptation within the Superfund Program", the link "Final OSWER Climate Change Adaptation Implementation Plan" at the URL http://www3.epa.gov/climatechange/adaptation/programs/Final-EPA-Adaptation-plans.html currently leads to a notice page stating "This page is being updated" (November 19, 2017).
 - The redirect to the notice page has been in place since the EPA removed its climate change subdomain, "epa.gov/climatechange" on April 27, 2017.
- This report does not explore access to the "Plan" resource prior to the April 27, 2017 removals.

Climate Change Adaptation within the Superfund Program

EPA's Office of Superfund Remediation and Technology Innovation, which manages the Superfund program, is collaborating with other national program offices to implement the Climate Change Adaptation Implementation Plan released by the Agency's Office of Solid Waste and Emergency Response in June 2014. Adaptation plans for the Superfund Program involve the following key

- 1. Develop criteria to identify the types of remedies for which performance may be affected by climate change.
- 2. Develop a protocol for evaluating and ensuring remedy protectiveness on a site-specific basis.

 3. Produce adaptation fact sheets specific to the types of remediation systems most likely to be
- a-rioute adaptation fact sneets specific to the types of emediation systems most likely to affected by climate change, to help project decision-makers identify potential system vulnerabilities and adaptation measures.
- 4. Identify existing Superfund Program processes (such as remedial investigations/feasibility studies, records of decision, remedial designs/remedial actions and five-year reviews) in which climate change adaptation measures may be integrated to ensure continuing protectiveness of current and future remedies.
- Develop and implement in-person and Web-based training to help EPA regional staff, cleanup contractors and other stakeholders plan and implement remedies that are resilient to weathe and climate changes.
- Exchange updated information and learned lessons with EPA's regional offices to foster application of climate change science as a standard EPA business practice.
- Final OSWER Climate Change Adaptation Implementation Plan

Internet Archive's Wayback Machine: version from <u>April 27, 2017</u> and version from <u>November 6, 2017</u> (versions are identical)