Climate Change Adaptation Plan

Prepared by:

FEDERAL TRADE COMMISSION
Office of Administrative Services
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FTC CLIMATE CHANGE ADAPTATION POLICY STATEMENT

The Federal Trade Commission prevents business practices that are anticompetitive or deceptive or unfair to consumers; enhances informed consumer choice and public understanding of the competitive process; and accomplishes this without unduly burdening legitimate business activity.

Climate change may negatively impact the accomplishment of the FTC's mission by preventing the execution of its programs, policies and operations. The FTC is committed to institute adaptation strategies as a component of strategic near- and long-term planning to ensure continuation and success of mission activities.

PLANNING REQUIREMENTS

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The FTC is an independent commission with its headquarters offices located in Washington, DC and eight regional offices located in Atlanta, Georgia; New York, New York; Cleveland, Ohio; Chicago, Illinois; Seattle, Washington; San Francisco, California; Los Angeles, California; and Dallas, Texas. The majority of employees (1,002) are located in headquarters facilities, with the remaining 178 employees located throughout the aforementioned regional offices. For the most part, employees work in fully-serviced leased buildings (space for the FTC is acquired by the General Services Administration (GSA)). One exception is the FTC's Headquarters Building (also known as the Apex Building), which is a government-owned facility with delegated operation to the FTC from GSA.

FTC employees are lawyers, economists, and support personnel. Because work dedicated to accomplishing the FTC's mission is legal and/or analytical, much of this work is portable and can be accomplished as long as the FTC network and Internet access are available.

The FTC identified the following climate change impacts that could affect the accomplishment of the agency's mission:

Extreme Weather Conditions Necessitating a City-wide Shutdown

The impact to the FTC depends on the location. If a shutdown occurs in Washington, DC, this has a medium impact on the agency because of the increased number of employees at headquarters and the associated number of programs and cases focused in this one particular location. The impact for one regional office, or even a group of regional offices at the same time, is considered low because of the smaller number of employees. The largest regional office, New York, has 25 employees; the smallest office, Atlanta, has only 14 employees. These events typically do not last longer than one week.

The risk of such an event is high. In January 2014, different events, and on different dates, both Atlanta and Cleveland offices were shut down for two days due to extreme weather conditions. The Office of Personnel Management closed the federal government in the National Capital Area on January 21, 2014.

Atypical/Extreme Temperatures

Most of the FTC's facilities are comprised of fully-serviced leases, and utilities are included in the monthly, fixed rent fee. In the regional offices, as well as some facilities in the DC area, atypical temperatures represent zero risk, and thus zero impact to the agency. The one exception is the Headquarters Building where the FTC directly pays for electricity (air conditioning) in the cooling season and for steam (heat) during the heating season.

This is a low impact, low risk situation. While temperature fluctuations may negatively impact the FTC's budget, fluctuations also could swing the other way (e.g., an unseasonably cool summer).

COOP-Level Event

There is the very real possibility that a climate event could activate the FTC's Continuity of Operations (COOP) plan. In the summer of 2006, a flood rendered the Robert F. Kennedy (Main Justice) and the Internal Revenue Service Headquarters buildings uninhabitable. These two buildings are only one and two blocks away from the FTC Headquarters Building, respectively (the FTC's building was unaffected during the flood). Depending on the severity and length of such an event, the FTC would activate the agency's COOP plan and inform personnel what actions to take.

The FTC's COOP plan is only in place for Washington, DC. No COOP plans are warranted for regional offices as work could be reassigned to staff from headquarters, to staff from another regional office, or delayed. In other words, the impact to the agency due to a regional office COOP-level event is minimal.

A COOP-level climate change event to headquarters, however, has the potential for extremely high impact. The risk for such an event is low. While the government may shut down occasionally due to severe weather, COOP activation is extremely rare.

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Extreme Weather Conditions Necessitating a City-wide Shutdown

As noted above, the work accomplished by the FTC is extremely portable. Most FTC employees have signed telework agreements. In the event of a climate change event that prevents access to an FTC facility, employees that are able to may telework.

In order to build resilience in the long term, the FTC is implementing a new telework solution that is more robust than the agency's current telework technology. In addition, the new telework solution will provide employees with greater access to programs as well as an increased number of employees that can log onto the system at the same time.

Finally, the FTC is investigating cloud backups and cloud program access. This will provide greater redundancy in the event that something happens to the agency's primary servers as well as increasing employee access to data and programs.

Atypical/Extreme Temperatures

Atypical or extreme temperatures have little impact on FTC programs or policies. In the event of such climate change events, the FTC is prepared to reprogram funds to account for higher utility costs in the Headquarters Building.

The FTC also is prepared to respond, research, and investigate allegations of price fixing or gouging, especially in targeted locales. It is not uncommon delay or table ongoing work, especially work with deadlines (e.g., employees may request a continuance if they are in the midst of a co

The FTC does not discourage investments that increase climate change resilience; however, the FTC does educate consumers and provide guidance to the public to make informed purchasing decisions. Consumers are increasingly making purchasing decisions based on the environmental impact of products. As a result, marketers are making "green" claims about their products. The FTC continues to bring enforcement actions against marketers to weed out deceptive green claims. The purchase of a greater number of green items, and a reduction of deceptive green products, increases the Nation's resilience to climate change.

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After review of programs, the FTC has no identified policies or funding programs that may increase the vulnerability of natural or built systems, economic