SMALL BUSINESS ADMINISTRATION

2016 Strategic Sustainability Performance Plan

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Policy Statement

The Small Business Administration's (SBA) Strategic Sustainability Performance Plan (SSPP) offers a blueprint and a framework for the Agency to execute its mission in a manner that preserves the environment and demonstrates a commitment to creating a clean energy economy. The SBA will lead by example in achieving its sustainability goals by:

- Tracking and reducing its greenhouse gas emissions
- Partnering with the General Services Administration to make sustainable improvements to SBA's existing facilities and to select sustainable facilities in the future
- Increasing the SBA's acquisition of Alternative Fuel Vehicles
- Increasing the SBA's energy and water efficiency
- Reducing the amount of refuse generated and promoting the recycling of a wide variety of products
- Leveraging acquisitions to foster a market for sustainable goods and products
- Promoting electronics stewardship and the purchase of efficient electronics
- Increasing the agency's resilience to the impacts of climate change
- Increasing the agency's communications with SBA staff and the public regarding the importance of these efforts and their role in a clean energy economy

SBA will integrate its sustainability goals into existing management processes. The Office of the Chief Operating Officer will be the lead office pursuing these efforts under the direction of the Chief Sustainability Officer.

SBA will comply with environmental and energy statutes, regulations and Executive Orders (EOs), and will implement EO 13693 by executing and reporting on the goals in this Strategic Sustainability Performance Plan.

//SIGNED// 6/27/2016

Joseph P. Loddo Date
Chief Sustainability Officer

Executive Summary

1) **Vision**

The U.S. Small Business Administration's (SBA) Strategic Sustainability Performance Plan offers a blueprint and a framework for the SBA to execute its mission in a manner that preserves the environment and in the process demonstrates a commitment to creating a clean energy economy. In FY 2015, and the first half of FY 2016, the SBA achieved significant progress towards the goals outlined by EO 13514. Notably, in FY 2015 SBA reduced its Scope 3 greenhouse gas emissions by 6.4% from its FY2014 emissions.

In FY 2016 and FY 2017 SBA plans to continue on this ambitious path by implementing the new requirements established by EO 13693. The SBA has proposed targets for reducing its Scope 1 greenhouse gas emissions from the agency's vehicle fleet by 35% and its Scope 3 greenhouse gas emissions from employee travel and commuting by 40% by FY 2025. SBA's Scope 3 emissions are already below the 2025 target, and are on track to be even further reduced. To achieve its Scope 1 goal the agency intends to continue its efforts to ensure the agency's fleet is as fuel efficient as possible while raising the proportion of the agency's fleet that is composed of alternative fuel vehicles, zero emissions vehicles, or plug-in hybrids. To achieve its Scope 3 goal the agency plans to continue promoting low-emissions commuting by supporting the use of mass transit, carpools and bike commuting. In addition, the SBA has continued to implement strict caps on travel spending that keep emissions from government travel low. The SBA looks forward to pursuing these goals alongside the other requirements outlined by EO 13693.

2) **Leadership**

SBA's Office of the Chief Operating Officer, under the leadership of the agency's Chief Operating Officer (COO) and Deputy Chief Operating Officer/Chief Administrative Officer, is leading the implementation of SBA's Sustainability Program. The DCOO/CAO is also the Chief Sustainability Officer for the agency. The Office of the COO coordinates the development and implementation of this plan, and the SBA's Greenhouse Gas Inventory on an annual basis. The Office of the COO also manages the agency's internal sustainability website. The facilities, vehicle fleet, and property management for the agency are all functions associated with the Office of the COO which allows for streamlined sustainability policy development in these areas. In addition, the Office of the Chief Information Officer, Office of Human Resource Solutions and the Office of Disaster Planning and Risk Management, which manages the agency's Continuity of Operations program, are sub-offices under the Office of the COO which facilitates cooperation on topics such as electronics stewardship, Continuity of Operations, climate change adaptation, and telework. The Office of the COO frequently collaborates with the GSA on facilities related projects because the GSA leases all of the SBA's facilities on behalf of the SBA. Likewise, the Office of the COO works closely with the Office of the Chief Financial Officer on sustainable procurement.

3) **Performance Summary Review**

a. **Greenhouse Gas Reduction**

i) **Progress.** SBA's FY 2015 Scope 3 greenhouse gas emissions were 40% below the agency's FY 2008 baseline and a 6.4% reduction from its FY 2014 emissions.

ii) **Challenges.** The major challenge the SBA faces regarding its Scope 1 and 2 emissions is that SBA cannot report most of its emissions due to its occupancy of leased facilities. After FY 2015, the SBA will terminate this voluntary reporting and focus on ensuring its leases over 10,000 SF require disclosures of energy usage data required to calculate emissions in accordance with EO 13693

iii) **Strategies and Planned Actions.** SBA uses the Federal Energy Management Program (FEMP) GHG emissions report to track its fleet emissions and inputs them in its annual GHG Inventory. SBA is starting to achieve greater progress in this area because of a fleet right-sizing effort in FY 2013 and improvements to the SBA's vehicle replacement processes that are ensuring AFVs or low-GHG emissions vehicles are procured whenever possible. Much of the reduction was achieved through lowered commuter emissions. SBA continues to encourage telework, carpooling, mass transit commuting, and bicycle commuting to maintain emissions at these low levels. In addition, caps on travel spending have contributed to significant decreases in emissions from travel. SBA's emissions from ground travel have decreased by 75% since FY 2008 and its emissions from air travel have decreased by 50% since FY 2008.

b. **Sustainable Buildings**

i) **Progress.** SBA's footprint remains below the Freeze the Footprint baseline established in 2012. Many SBA facilities are located in green and/or LEED-certified buildings.

ii) **Challenges.** As a fully-leased agency, and in most cases not the majority building tenant, SBA does not have control over building improvements and upgrades.

iii) **Strategies and Planned Actions.** SBA integrates its efforts to reduce its agency rent footprint with its efforts to increase the sustainable features of its facilities. In FY 2015 SBA also conducted a review of its recent leases to ensure GSA's standard sustainable building clauses were included. The results of the review showed that the standard sustainable building clauses were included in the majority of leases. In FY 2016 and FY 2017 the SBA will focus its efforts on collaborating with the GSA to comply with new requirements for leased facilities over 10,000 SF as well as placing an increased emphasis on procuring sustainable materials and furnishings when renovating leased space.

c. Fleet Management

i) **Progress.** In March of 2014 SBA had 106 AFVs (96 gas/ethanol vehicles and 10 hybrid vehicles) which comprised 69% of its fleet. As of March 2016, SBA has 120 AFVs (98 gas/ethanol vehicles, 9 hybrid electric vehicles and 14 low greenhouse gas vehicles) which make up 74% of the agency's fleet.

ii) **Challenges.** SBA frequently requests AFVs that do not require special fuel, such as hybrids; however, GSA often does not have these vehicles in stock. In response to this challenge and the lack of availability of Flex Fuel stations, SBA has begun to acquire low greenhouse gas vehicles as a means of ensuring the agency will meet its AFV goals. The lack of readily available hybrid and other AFVs in GSA's vehicle inventory that do not depend on special fuels, as well as the higher cost of these vehicles in comparison to others, makes it difficult for SBA to acquire AFVs that are practical for the area in which they are located. The lack of fueling stations for the vehicles that need special fuels to achieve their maximum efficiency compounds this challenge.

iii) **Strategies and Planned Actions.** SBA plans to continue building on this progress in the future by increasing its numbers of AFVs, and continually examining the usage of its current vehicles to identify opportunities for vehicle eliminations. These efforts will result in additional cost savings and improved environmental outcomes, in addition to the progress SBA has made to date.

d. Water Use Efficiency and Management

i) **Progress.** Because SBA is a fully lease-serviced agency, there are no metrics currently available as to Agency water use rates.

ii) **Challenges.** As an agency whose primary water use comes from office buildings leased through GSA and owned by private landlords or other agencies, SBA is very constrained in its ability to directly control its water efficiency.

iii) **Strategies and Planned Actions.** SBA has identified lease clauses from GSA's template leases that focus on water conservation and the SBA is working to ensure these clauses are included in leases for the SBA's facilities. Finally, SBA is working to raise the awareness of its employees about the need to conserve water through agency-wide communication methods.

e. Pollution Prevention and Waste Reduction

i) **Progress.** SBA does not directly produce pollution other than municipal solid waste and the emissions associated with its office buildings and its vehicle fleet. SBA does not utilize any toxic chemicals in its operations and all cleaning chemicals are owned and managed by the owners of SBA's leased facilities

ii) **Challenges.** As an agency whose primary water use comes from office buildings leased through GSA and owned by private landlords or other agencies, SBA is very constrained in its ability to directly control its waste management in that often times private landlords do not always offer building recycling programs.

iii) **Strategies and Planned Actions.** SBA is working to increase the amount of glass, metal and plastic recycled by its employees, to increase the recycling of construction debris, to reuse government property whenever possible, and to expand the implementation of a small electronics recycling program in a partnership with the U.S. Postal Service in FY 2016 and FY 2017. SBA recently received recognition for innovation from the Environmental Protection Agency's Region III Federal Green Challenge for its early adoption of the U.S. Postal Service's small electronics recycling program.

f. Sustainable Acquisition

i) **Progress.** SBA included sustainable procurement clauses in XX actions in FY 2015.

ii) **Challenges.** SBA only purchases a limited amount of goods and services that are covered by the sustainable acquisitions requirements.

iii) **Strategies and Planned Actions.** SBA continues to work to increase its procurement of sustainable goods. The SBA also continued the implementation of its green procurement training requirement for CORs and Purchase Card holders in FY 2016. Finally, the SBA continues to use FSSI BPAs to procure sustainable goods and services including copiers, wireless internet service, office supplies and shipping services.

g. Electronic Stewardship and Data Centers

i) **Progress.** SBA is steadily increasing its efforts to achieve its data center consolidation goals and to improve its electronics stewardship. SBA's Data Center management and consolidation is controlled by the agency's requirements to evaluate and consolidate Data Centers under OMB's Data Center Consolidation Initiative. In FY16, SBA migrated many systems to The Cloud, reducing Agency reliance on in-house data centers.

ii) **Challenges.**

iii) **Strategies and Planned Actions.** SBA continues to pursue its small electronics recycling partnership with the U.S. Postal Service and the SBA will investigate an expansion of this program as well as the increased use of UNICOR for electronics recycling in FY 2016 and FY 2017.

h. Renewable Energy

i) **Progress.** N/A

ii) **Challenges.** SBA's ability to increase its renewable energy consumption is integrally related to its facilities management system. Because SBA is a tenant in leased facilities owned by private landlords and other agencies, SBA is not in a good position to install or purchase renewable energy directly.

iii) **Strategies and Planned Actions.** SBA has identified lease clauses from GSA's template leases that focus on energy conservation and the SBA is working to ensure these clauses are included in all future leases for SBA facilities.

i. Climate Change Resilience

i) **Progress.** SBA has continued to develop measure identified in the 2014 Climate Change Adaptation Plan and the 2015 Strategic Sustainability Performance Plan to enhance the resilience of both SBA and small businesses across the country. SBA has participated in the development of and adopted standards such as the Federal Flood Risk Management Standard and guidelines for the wildland-urban interface impacting the application of our various loan programs. These loan programs also require the application of local building codes to repairs and new construction. The Disaster Loan Program provides optional funds for mitigation purposes, including "safe rooms." Efforts in support of PrepareMyBusiness.org continue; options to support expand the resilience of small businesses is constantly under review.

ii) **Challenges.** SBA's mission is to support small business and can do little to effectively *mandate* action by small business towards resiliency. Most significantly, small businesses are limited in how much investment they can make in developing resilience. SBA attempts to highlight simple, inexpensive actions capable of yielding significant improvements for small businesses.

iii) **Strategies and Planned Actions.** SBA is a member of the Mitigation Framework Leadership Group (MitFLG), which continues to develop standards such as Federal Flood Risk Management Standard (FFRMS), a flexible framework to increase resilience of federally funded projects against flooding and help preserve the natural values of floodplains. SBA will adapt and adopt those standards as appropriate. SBA will update its emergency response procedures and protocols to account for projected climate change, including extreme weather events, through its annual review of its Continuity of Operations Plan (outlining internal activities to preserve mission essential functions) and Disaster Preparedness and Operations Plan (outlining actions to be taken in support of small businesses and others. SBA is focusing on enhancing small business resilience as it supports an interagency effort led by the National Security Council to improve the national capability to effect economic recovery following disaster. While, to date, SBA has identified no specific climate change risks through its developing Enterprise Risk Management program, as that program continues to evolve climate change impacts such as rising sea levels and extreme weather conditions will receive additional consideration.

j. Energy Performance Contracts

i) **Progress.** N/A

ii) **Challenges.** SBA leases all of its facilities through GSA and many of the buildings SBA occupies are owned by private landlords. SBA would not receive an appropriate return on its investment from ESPCs because these improvements in efficiency benefit the building landlords who pay for all utilities, and provide no financial benefit to the agency, while incurring significant implementation costs.

iii) **Strategies and Planned Actions.** SBA has identified lease clauses from GSA's template leases that focus on energy conservation and the SBA is working to ensure these clauses are included in all future leases for SBA facilities.

4) **Progress On Administration Priorities**

a. **President's Performance Contracting Challenge**: SBA had no established targets toward the President's Challenge, including new targets for FY 17 and 18.

b. **Electric and Zero Emission Vehicles**: Outline plans to integrate zero emission and plug-in hybrid vehicles into the agency fleet over the next four years. Include annual milestones and targets for ZEV/PHEV acquisitions, as well as associated charging infrastructure.

c. **Climate Preparedness and Resilience**: In response to risk management requirements of Executive Order 13653 the SBA has taken several measures to ensure that climate change related risks are identified and assessed and that the SBA collaborates with other agencies in managing broad risks to the United States as a whole. The SBA's risk management framework consists of three components: the Disaster Preparedness and Recovery Plan, Continuity of Operations Planning, and the new Enterprise Risk Management Program.

Through these mechanisms, as well as individual meetings with different program offices, the SBA identified three impacts from climate change that needed to be analyzed to identify their implications for SBA’s mission and programs. The following impacts were identified: sea level rise and increased storm surges, increased temperatures and increased severe weather events. In addition, the SBA examined the possible impacts of climate change on the agency’s real property portfolio and identified ways in which the SBA will collaborate with other agencies to support climate change risk management across the government.

Size & Scope of Agency Operations

Agency Size and Scope	FY 2014	FY 2015
Total Number of Employees as Reported in the President's Budget	3128	3392
Total Acres of Land Managed	0	0
Total Number of Buildings Owned	0	0
Total Number of Buildings Leased (GSA and Non-GSA Lease)	185	183
Total Building Gross Square Feet (GSF)	1,319,731	1,365,555
Operates in Number of Locations Throughout U.S.	164	165
Operates in Number of Locations Outside of U.S.	0	0
Total Number of Fleet Vehicles Owned	0	0
Total Number of Fleet Vehicles Leased	156	160
Total Number of Exempted-Fleet Vehicles (Tactical, Law Enforcement, Emergency, Etc.)	0	0
Total Amount Contracts Awarded as Reported in FPDS ($Millions)	140.3	Unk.

Agency Progress and Strategies to Meet Federal Sustainability Goals

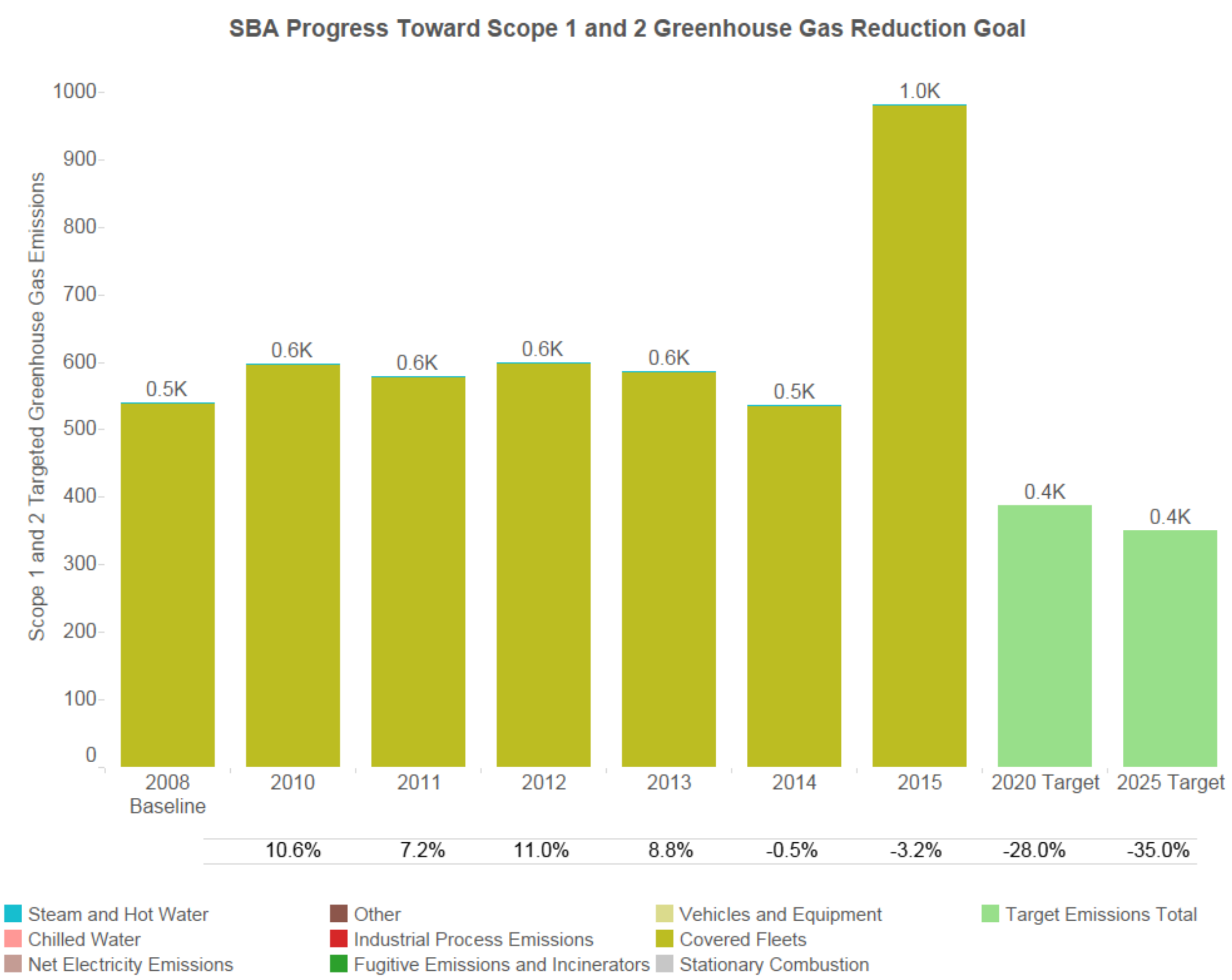
This section provides an overview of progress through FY 2015 on sustainability goals contained in Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, and agency strategies to meet the new and updated goals established by Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*.

Goal 1: Greenhouse Gas (GHG) Reduction

Scope 1 & 2 GHG Reduction Goal

E.O. 13693 requires each agency to establish a Scope 1 & 2 GHG emissions reduction target to be achieved by FY 2025 compared to a 2008 baseline. SBA's 2025 Scope 1 & 2 GHG reduction target is 35%.

Chart: Progress toward Scope 1 & 2 GHG Reduction Goal



Scope 1 & 2 GHG Reduction Strategies

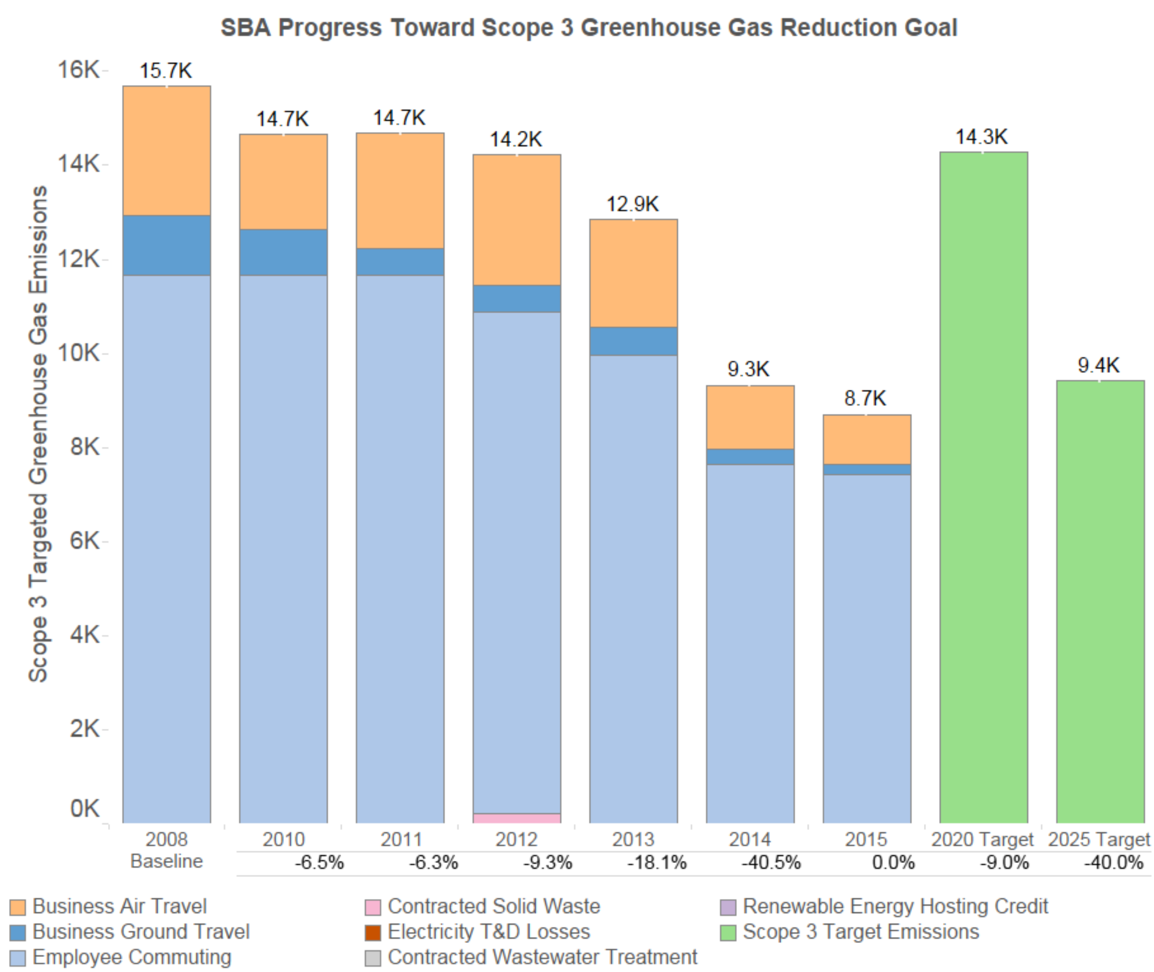
Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Use the Federal Energy Management Program (FEMP) GHG emission report to identify/target high emission categories and implement specific actions to address high emission areas identified.	Yes	SBA’s only mandatorily reported source of Scope 1&2 GHG emissions is the agency's vehicle fleet. SBA uses the FEMP GHG emission report to track its fleet emissions. SBA’s fleet management targets will result in reductions in Scope 1 emissions that will be reflected in the FEMP GHG emission report.	The SBA will use the FY 2016 greenhouse gas inventory to continue monitoring its fleet emissions. The inventory will also be used to gauge whether recent efforts to: (1) increase the number of AFVs and low greenhouse gas emissions vehicles within the SBA's fleet and; (2) to closely follow GSA's vehicle replacement schedules are successfully reducing emissions.
Identify and support management practices or training programs that encourage employee engagement in addressing GHG reduction.	Yes	SBA is currently revising its fleet management Statement of Policy. The revised version will include increased emphasis on the procurement of AFVs, low greenhouse gas emissions vehicles, zero emissions vehicles and plug-in hybrids among other efforts to reduce the emissions from SBA's fleet.	
Determine unsuccessful programs or measures to be discontinued to better allocate agency resources.	Yes	Previously, the SBA has voluntarily reported Scope 3 emissions from some of its leased facilities. Because of new requirements under EO 13693, the General Services Administration has been charged with reporting emissions from leased facilities over 10,000SF. In order to avoid duplicative reporting, the SBA will no longer report voluntary emissions from its larger leased buildings.	SBA will no longer collect and report voluntary Scope 3 emissions from its leased facilities in FY 2017.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Given agency performance to date, determine whether current agency GHG target should be revised to a more aggressive/ambitious target.	No	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Employ operations and management (O&M) best practices for emission generating and energy consuming equipment.	No	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Identify additional sources of data or analysis with the potential to support GHG reduction goals.	No	Because SBA is only required to report its fleet emissions, the agency does not need additional sources of data or alternative methods of analysis to support its fleet emissions goals.	N/A

Scope 3 GHG Reduction Goal

E.O. 13693 requires each agency to establish a Scope 3 GHG emission reduction target to be achieved by FY 2025 compared to a 2008 baseline. SBA's 2025 Scope 3 GHG reduction target is 40%.

Chart: Progress Toward Scope 3 GHG Reduction Goal



Scope 3 GHG Reduction Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Reduce employee business ground travel.	Yes	The SBA has followed guidance from the Campaign to Cut Waste and greatly reduced employee business ground travel since FY 2012 through the use of caps on travel funding.	Reduce employee business ground travel.
Reduce employee business air travel.	Yes	The SBA has followed guidance from the Campaign to Cut Waste and greatly reduced employee business ground travel since FY 2012 through the use of caps on travel funding.	Achieve a reduction of at least 5% in employee business air travel
Develop and deploy an employee commuter emissions reduction plan.	No	SBA is focusing its efforts on increasing the commuting options for the agency's employees, rather than setting specific commute reduction targets.	Develop and deploy employee commuter reduction plan in FY17
Use an employee commuting survey to identify opportunities and strategies for reducing commuter emissions.	Yes	SBA uses its annual Commuter Survey to track the agency's emissions over time and to identify strategies to reduce emissions. For example, in FY 2015 SBA asked a series of customized questions regarding bikeshare programs to gauge employee interest in this mode of transportation, where it is available.	Use employee commuting survey to identify opportunities and strategies for reducing commuter emissions.
Increase & track number of employees eligible for telework and/or the total number of days teleworked.	Yes	SBA significantly increased the number of teleworking employees. As of the end of CY15, 1327 out of 3392 employees (approximately 40%) teleworked at least one day a week.	Increase number of employees eligible for telework and increase percentage of teleworking employees to over 50%.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Develop and implement a program to support alternative/zero emissions commuting methods and provide necessary infrastructure.	No	The SBA already provides bicycle commuting infrastructure, such as secure bike racks, at many of its facilities. However, because the SBA occupies fully serviced lease space, the SBA is not in the position to greatly expand the bicycling infrastructure at its facilities at this time.	N/A
Establish policies and programs to facilitate workplace charging for employee electric vehicles.	No	Because the SBA occupies fully serviced lease space, the SBA is not in the position to greatly expand the infrastructure for workplace charging of employee electric vehicles at its facilities at this time.	N/A
Include requirements for building lessor disclosure of carbon emission or energy consumption data and report Scope 3 GHG emissions for leases over 10,000 rentable square feet.	Yes	SBA will collaborate with GSA to ensure that new leases over 10,000 SF include requirements for the disclosure of greenhouse gas emissions related data.	Plan to begin FY 2016: Report scope 3 greenhouse gas emissions for leases over 10,000 E.O. 3(h)(v) rentable square feet.

Goal 2: Sustainable Buildings

Building Energy Conservation Goal

The Energy Independence and Security Act of 2007 (EISA) requires each agency to reduce energy intensity 30% by FY 2015 as compared to FY 2003 baseline. Section 3(a) of E.O. 13693 requires agencies to promote building energy conservation, efficiency, and management and reduce building energy intensity by 2.5% annually through the end of FY 2025, relative to a FY 2015 baseline and taking into account agency progress to date, except where revised pursuant to Section 9(f) of E.O. 13693.

Chart: Progress toward Facility Energy Intensity Reduction Goal

No Data Available

Building Energy Conservation Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Make energy efficiency investments in agency buildings.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Use remote building energy performance assessment auditing technology	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Participate in demand management programs.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Incorporate Green Button data access system into reporting, data analytics, and automation processes.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Redesign interior space to reduce energy use through daylighting, space optimization, and sensors and control systems.	Yes	The SBA is developing and implementing space standards for its office space facilities. The SBA is also implementing the Reduce the Footprint guidance issued by the OMB and the GSA.	SBA has submitted its Real Property Efficiency Plan which will establish the SBA's goals for space utilization and space reduction for FY 2017-FY 2021. This plan contains numerous space optimization requirements.
Identify opportunities to transition test-bed technologies to achieve energy reduction goals.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Follow city energy performance benchmarking and reporting requirements.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install and monitor energy meters and sub-meters.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Collect and utilize building and facility energy use data to improve building energy management and performance.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Ensure that monthly performance data is entered into the EPA ENERGY STAR Portfolio Manager.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A

Building Efficiency, Performance, and Management Goal

Section 3(h) of E.O. 13693 states that agencies will improve building efficiency, performance, and management and requires that agencies identify a percentage of the agency's existing buildings above 5,000 gross square feet intended to be energy, waste, or water net-zero buildings by FY 2025 and implementing actions that will allow those buildings to meet that target. SBA’s 2025 target is 15% above 5,000 gross square feet.

Guiding Principles for Sustainable Federal Buildings

Section 3(h) of E.O. 13693 also states that agencies will identify a percentage, by number or total GSF, of existing buildings above 5,000 GSF that will comply with the *Guiding Principles for Sustainable Federal Buildings (Guiding Principles)* by FY 2025.

Although SBA owns no buildings and is a fully-leased agency, SBA's FY 2025 target is 15% of buildings above 5,000 gross square feet.

Chart: Percent of Buildings Meeting the Guiding Principles

No Data Available

Sustainable Buildings Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Include climate resilient design and management into the operation, repair, and renovation of existing agency buildings and the design of new buildings.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
In planning new facilities or leases, include cost-effective strategies to optimize sustainable space utilization and consideration of existing community transportation planning and infrastructure, including access to public transit.	No	The GSA already includes standard requirements that new leased space acquired for the SBA is convenient to public transportation.	N/A
Ensure all new construction of Federal buildings greater than 5,000 GSF that enters the planning process be designed to achieve energy net-zero and, where feasible, water or waste net-zero by FY 2030.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Include criteria for energy efficiency as a performance specification or source selection evaluation factor in all new agency lease solicitations over 10,000 rentable square feet.	Yes	SBA will work with the GSA to ensure all new lease solicitations over 10,000 SF include criteria for energy efficiency as performance specification or source selection evaluation factor.	All new and renewed leases over 10,000 SF include criteria for energy efficient performance.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Incorporate green building specifications into all new construction, modernization, and major renovation projects.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Implement space utilization and optimization practices and policies.	Yes	The SBA is developing and implementing space standards for its office space facilities. The SBA is also implementing the Reduce the Footprint guidance issued by the OMB and the GSA. SBA's goal is right-sizing the agency portfolio by FY2021	SBA has submitted its Real Property Efficiency Plan which will establish the SBA's goals for space utilization and space reduction for FY 2017-FY 2021. This plan contains numerous space optimization requirements.
Implement programs on occupant health and well-being in accordance with the *Guiding Principles.*	No	SBA has a robust health and well-being program managed by the Office of Human Resource Solutions, that provides employees with information and resources regarding health and wellness, child care subsidy, workplace flexibilities, elder/adult dependent care, Employee Assistance Program, and other programs	N/A

Goal 3: Clean & Renewable Energy

Clean Energy Goal

E.O. 13693 Section 3(b) requires that, at a minimum, the percentage of an agency's total electric and thermal energy accounted for by renewable and alternative energy shall be not less than: 10% in FY 2016-17; 13% in FY 2018-19; 16% in FY 2020-21; 20% in FY 2022-23; and 25% by FY 2025.

Renewable Electric Energy Goal

E.O. 13693 Section 3(c) requires that renewable energy account for not less than 10% of total electric energy consumed by an agency in FY 2016-17; 15% in FY 2018-19; 20% in FY 2020-21; 25% in FY 2022-23; and 30% by 2025.

Chart: Use of Renewable Energy as a Percentage of Total Electric Energy

No Data Available

Clean and Renewable Energy Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Install agency-funded renewable on-site and retain corresponding renewable energy certificates (RECs).	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Contract for the purchase of energy that includes installation of renewable energy on or off-site and retain RECs or obtain replacement RECs.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Purchase electricity and corresponding RECs or obtain equal value replacement RECs.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Purchase RECs to supplement installations and purchases of renewable energy, when needed to achieve renewable goals.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install on-site thermal renewable energy and retain corresponding renewable attributes or obtain equal value replacement RECs.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install on-site combined heat and power processes.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Identify opportunities to install on-site fuel cell energy systems.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Identify opportunities to utilize energy that includes the active capture and storage of carbon dioxide emissions associated with energy generation.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Identify and analyze opportunities to install or contract for energy installed on current or formerly contaminated lands, landfills, and mine sites.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Identify opportunities to utilize energy from small modular nuclear reactor technologies.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A

Goal 4: Water Use Efficiency & Management

Potable Water Consumption Intensity Goal

E.O. 13693 Section 3(f) states that agencies must improve water use efficiency and management, including stormwater management, and requires agencies to reduce potable water consumption intensity, measured in gallons per square foot, by 2% annually through FY 2025 relative to an FY 2007 baseline. A 36% reduction is required by FY 2025.

Industrial, Landscaping and Agricultural (ILA) Water Goal

E.O. 13693 section 3(f) also requires that agencies reduce ILA water consumption, measured in gallons, by 2% annually through FY 2025 relative to a FY 2010 baseline.

Chart: Progress toward the Potable Water Intensity Reduction Goal

No Data Available

Water Use Efficiency & Management Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Install green infrastructure features to assist with storm and wastewater management.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install and monitor water meters and utilize data to advance water conservation and management.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install high efficiency technologies, e.g. WaterSense fixtures.	Yes	The GSA requires lessors to use high efficiency plumbing equipment and WaterSense technologies in buildings leased by the SBA.	Continue to use leases requiring lessors to use high efficiency plumbing equipment and WaterSense technologies for leases initiated in FY 2016 and beyond.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Prepare and implement a water asset management plan to maintain desired level of service at lowest life cycle cost.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Minimize outdoor water use and use alternative water sources as much as possible.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Design and deploy water closed-loop, capture, recharge, and/or reclamation systems.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Install advanced meters to measure and monitor potable and ILA water use.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Develop and implement programs to educate employees about methods to minimize water use.	Yes	The SBA uses multiple programs to educate employees about sustainability, including water conservation. The SBA publishes "green tips of the month" in the SBA's daily e-newsletter to all employees. SBA's Sustainability Program also publishes periodic reminders to all employees	Include tips on water conservation in agency-wide publications at least monthly throughout FY2017
Assess the interconnections and dependencies of energy and water on agency operations, particularly climate change's effects on water which may impact energy use.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Consistent with State law, maximize use of grey-water and water reuse systems that reduce potable and ILA water consumption.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Consistent with State law, identify opportunities for aquifer storage and recovery to ensure consistent water supply availability.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Ensure that planned energy efficiency improvements consider associated opportunities for water conservation.	N/A	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	N/A
Where appropriate, identify and implement regional and local drought management and preparedness strategies that reduce agency water consumption	Yes	When drought is impacting a particular region, the SBA collaborates with the appropriate GSA Regional Account Manager to ensure facilities leased by SBA have access to resources and recommendations regarding water conservation.	The SBA will collaborate with GSA Regional Account Managers as appropriate in FY 2017.

Goal 5: Fleet Management

Fleet Petroleum Use Reduction Goal

E.O. 13514 and the Energy Independence and Security Act of 2007 (EISA) required that by FY 2015 agencies reduce fleet petroleum use by 20% compared to a FY 2005 baseline.

Chart: Progress toward the Petroleum Reduction Goal

No Data Available

Fleet Alternative Fuel Consumption Goal

Agencies should have exceeded an alternative fuel use that is at least 5% of total fuel use. In addition, E.O. 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*, required that agencies increase total alternative fuel consumption by 10% annually from the prior year starting in FY 2005. By FY 2015, agencies must have increased alternative fuel use by 159.4%, relative to FY 2005.

In FY 2015, SBA's use of alternative fuel equaled 1.3% of total fuel use and increased 66.5% from FY2014. SBA has increased its alternative fuel use by 608.4% since FY 2005.

Fleet Per-Mile Greenhouse Gas (GHG) Emissions Goal

E.O. 13693 Section 3(g) states that agencies with a fleet of at least 20 motor vehicles will improve fleet and vehicle efficiency and management. E.O. 13693 section 3(g)(ii) requires agencies to reduce fleet-wide per-mile GHG emissions from agency fleet vehicles relative to a FY 2014 baseline and sets new goals for percentage reductions: not less than 4% by FY 2017; not less than 15 % by FY 2020; and not less than 30% by FY 2025.

E.O. 13693 Section 3(g)(i) requires that agencies determine the optimum fleet inventory, emphasizing eliminating unnecessary or non-essential vehicles. The Fleet Management Plan and Vehicle Allocation Methodology (VAM) Report are included as appendices to this plan.

Chart: Fleet-wide Per-mile GHG Emissions

No Data Available

Fleet Management Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Collect and utilize agency fleet operational data through deployment of vehicle telematics.	Yes	The SBA leases all of its vehicles from the GSA and will collaborate with the GSA to implement this requirement.	Deploy vehicle telematics by FY2018.
Ensure that agency annual asset-level fleet data is properly and accurately accounted for in a formal Fleet Management Information System as well as submitted to the Federal Automotive Statistical Tool reporting database, the Federal Motor Vehicle Registration System, and the Fleet Sustainability Dashboard (FLEETDASH) system.	Yes	The SBA leases all of its vehicles from the GSA. SBA monitors the status of its fleet through its Fleet Management System that consists of Drive Thru and the Federal Automotive Statistical Tool (FAST) reporting database. SBA also recently requested to be included in FLEETDASH.	SBA will begin using FLEETDASH in FY 2017.
Increase acquisitions of zero emission and plug-in hybrid vehicles.	No	SBA has increased the number of AFVs in its fleet from 69% to 74% over the past two years. SBA intends to continue increasing the number of AFVs in its fleet.	Increase AFV fleet percentage to 80% by FY2018
Issue agency policy and a plan to install appropriate charging or refueling infrastructure for zero emission or plug-in hybrid vehicles and opportunities for ancillary services to support vehicle-to-grid technology.	No	This strategy does not apply to the SBA because the SBA acquires all of its facilities through full-service leases provided by the GSA.	NA
Optimize and right-size fleet composition, by reducing vehicle size, eliminating underutilized vehicles, and acquiring and locating vehicles to match local fuel infrastructure.	Yes	SBA completed a right-sizing in FY 2013. However, the SBA continues to use the VAM to monitor the size of the SBA's fleet. In addition, the SBA is piloting the use of car sharing to reduce the need for government vehicles and local travel in personally owned vehicles. The pilot has already resulted in the elimination of 1 government vehicle.	Reduce additional government vehicles in FY2017 and FY2018.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Increase utilization of alternative fuel in dual-fuel vehicles.	No	Alternative fuel is still difficult to reliably obtain in many of the locations where SBA has facilities.	Increase alternative fuel use by 10% in FY2017.
Use a FMIS to track real-time fuel consumption throughout the year for agency-owned, GSA-leased, and commercially-leased vehicles.	Yes	The SBA currently uses Drive Thru and will use FLEET DASH in the future to measure fuel consumption throughout the year.	Obtain access to FLEET DASH and begin quarterly monitoring by end of FY 2015.
Implement vehicle idle mitigation technologies.	No	The SBA leases all of its vehicles through the GSA and the SBA is not aware of an option to implement specific vehicle idle mitigation technologies.	N/A
Minimize use of law enforcement exemptions by implementing GSA Bulletin FMR B-33, *Motor Vehicle Management, Alternative Fuel Vehicle Guidance for Law Enforcement and Emergency Vehicle Fleets.*	N/A	SBA neither leases nor owns any law enforcement vehicles	N/A
Where State vehicle or fleet technology or fueling infrastructure policies are in place, meet minimum requirements.	N/A	N/A	N/A
Establish policy/plan to reduce miles traveled, e.g. through vehicle sharing, improving routing with telematics, eliminating trips, improving scheduling, and using shuttles, etc.	*No*	Due to requirements to reduce business air travel, ground miles traveled have increased in FY2016 and the future. SBA is investigating strategies such as car sharing and improved scheduling to potentially decrease milage.	N/A

Goal 6: Sustainable Acquisition

Sustainable Acquisition Goal

E.O. 13693 section 3(i) requires agencies to promote sustainable acquisition by ensuring that environmental performance and sustainability factors are considered to the maximum extent practicable for all applicable procurements in the planning, award and execution phases of acquisition.

Biobased Purchasing Targets

The Agricultural Act of 2014 requires that agencies establish a targeted biobased-only procurement requirement. E.O. 13693 section 3(iv) requires agencies to establish an annual target for increasing the number of contracts to be awarded with BioPreferred and biobased criteria and the dollar value of BioPreferred and biobased products to be delivered and reported under those contracts in the following fiscal year.

For FY 2017, (Agency) has established a target of ____ contracts and $_________ in products to be delivered.

Note: to meet the requirement of the Agricultural Act of 2014 (2014 Farm Bill), all agencies should include targets, even if they achieved 95% biobased purchasing compliance in FY 2015.

Chart: Percent of Applicable Contracts Containing Sustainable Acquisition Requirements

No Data Available

Sustainable Acquisition Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Establish and implement policies to meet statutory mandates requiring purchasing preference for recycled content products, ENERGY STAR qualified and FEMP-designated products, and Biopreferred and biobased products designated by USDA.	*Yes*	All procurement packages developed by SBA employees must include environmental considerations, where applicable. In FY 2014 SBA conducted 37 actions valued at nearly $3,000,000 that included environmental clauses including 2 actions for environmentally preferable products and services.	The SBA does not conduct many acquisitions that trigger environmental consideration requirements. However, the SBA will continue to monitor the number and value of contracts on an annual basis that include the environmentally preferable preference.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Establish and implement policies to purchase sustainable products and services identified by EPA programs, including SNAP, WaterSense, Safer Choice, and Smart Way.	No	The SBA does not procure significant amounts of products that meet this designation.	NA
Establish and implement policies to purchase environmentally preferable products and services that meet or exceed specifications, standards, or labels recommended by EPA.	No	The SBA does not procure significant amounts of products that meet this designation.	NA
Use Category Management Initiatives and government-wide acquisition vehicles that already include sustainable acquisition criteria.	No	Because the majority of SBA's acquisitions do not involve sustainability criteria, the SBA does not consider this a priority for implementation.	N/A
Ensure contractors submit timely annual reports of their BioPreferred and biobased purchases.	No	The SBA does not procure significant amounts of products that can meet the biobased designation.	NA
Reduce copier and printing paper use and acquiring uncoated printing and writing paper containing at least 30 percent postconsumer recycled content or higher.	Yes	The SBA's OCIO is developing standards for common IT purchases including printers and copiers that will reduce paper usage through mandatory duplexing and other requirements.	OCIO is developing standards for common IT purchases such as printers and copiers that will mandate duplexing capabilities for implementation in FY 2016.
Identify and implement corrective actions to address barriers to increasing sustainable acquisitions.	No	The SBA conducted several analyses of its acquisitions in FY 2013 and FY 2014 and found that training for CORs and purchase card holders, which is already in place, was an effective corrective action.	N/A
Improve quality of data and tracking of sustainable acquisition through the Federal Procurement Data System (FPDS).	No	Because the majority of SBA's acquisitions do not involve sustainability criteria, the SBA does not consider this a priority for implementation.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Incorporate compliance with contract sustainability requirements into procedures for monitoring contractor past performance and report on contractor compliance in performance reviews.	No	Because the majority of SBA's acquisitions do not involve sustainability criteria, the SBA does not consider this a priority for implementation.	N/A
Review and update agency specifications to include and encourage products that meet sustainable acquisition criteria.	Yes	All procurement packages developed by SBA employees must include environmental considerations, where applicable. In FY 2014 SBA conducted 37 actions valued at nearly $3,000,000 that included environmental clauses including 35 actions for with requirements for energy efficient products and services.	The SBA will continue to monitor the number and value of contracts on an annual basis that include energy efficiency requirements. In addition, SBA's OCIO is developing standards for common IT purchases such as laptops and printers that will mandate energy efficient purchases in FY 2016.
Identify opportunities to reduce supply chain emissions and incorporate criteria or contractor requirements into procurements.	Yes	All procurement packages developed by SBA employees must include environmental considerations, where applicable. In FY 2014 SBA conducted 37 actions valued at nearly $3,000,000 that included environmental clauses including 35 actions for with requirements for energy efficient products and services.	The SBA will continue to monitor the number and value of contracts on an annual basis that include energy efficiency requirements. In addition, SBA's OCIO is developing standards for common IT purchases such as laptops and printers that will mandate energy efficient purchases in FY 2016.

Goal 7: Pollution Prevention & Waste Reduction

Pollution Prevention & Waste Reduction Goal

E.O. 13693 section 3(j) requires that Federal agencies advance waste prevention and pollution prevention and to annually divert at least 50% of non-hazardous construction and demolition debris. Section 3(j)(ii) further requires agencies to divert at least 50% of non-hazardous solid waste, including food and compostable material, and to pursue opportunities for net-zero waste or additional diversion.

Reporting on progress toward the waste diversion goal will begin with annual data for FY 2016.

Pollution Prevention & Waste Reduction Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Report in accordance with the requirements of sections 301 through 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (42 U.S.C 11001-11023).	N/A	As an agency that only leases office space, the SBA does not maintain any facilities where the EPCRA would apply.	N/A
Reduce or minimize the quantity of toxic and hazardous chemicals acquired, used, or disposed of, particularly where such reduction will assist the agency in pursuing agency greenhouse gas reduction targets.	N/A	As an agency that only leases and maintains office space, the SBA does not acquire toxic and hazardous chemicals.	N/A
Eliminate, reduce, or recover refrigerants and other fugitive emissions.	N/A	The SBA is not responsible for significant sources of fugitive emissions.	N/A
Reduce waste generation through elimination, source reduction, and recycling.	Yes	All SBA facilities offer at least some level of recycling. SBA will work with GSA to determine if additional service for recycling can be provided.	Increased recycling where available.
Implement integrated pest management and improved landscape management practices to reduce and eliminate the use of toxic and hazardous chemicals and materials.	Yes	The GSA includes standard requirements that new leased space acquired for the SBA use integrated pest management.	The SBA will continue to include this clause in its lease solicitations.
Develop or revise Agency Chemicals Inventory Plans and identify and deploy chemical elimination, substitution, and/or management opportunities.	N/A	The SBA does not purchase, use or store chemicals.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Inventory current HFC use and purchases.	N/A	The SBA is not responsible for significant sources of HFC emissions.	N/A
Require high-level waiver or contract approval for any agency use of HFCs.	N/A	The SBA is not responsible for significant sources of HFC emissions.	N/A
Ensure HFC management training and recycling equipment are available.	N/A	The SBA is not responsible for significant sources of HFC emissions.	N/A

Goal 8: Energy Performance Contracts

Performance Contracting Goal

E.O. 13693 section 3(k) requires that agencies implement performance contracts for Federal buildings. E.O. 13693 section 3(k)(iii) also requires that agencies provide annual agency targets for performance contracting. SBA's commitment under the President's Performance Contracting Challenge is not available in contracts awarded by the end of calendar year 2016. SBA's targets for the next two fiscal years are:

FY 2017: N/A
FY 2018: N/A

SBA leases all of its facilities through GSA and a majority of the buildings SBA occupies are owned by private landlords. SBA would not receive an appropriate return on its investment from energy performance contracts because these improvements in efficiency benefit the building landlords who pay for all utilities, and provide no financial benefit to the agency, while incurring significant implementation costs.

Chart: Progress toward Target under the President's Performance Contracting Challenge

No Data Available

Performance Contracting Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Utilize performance contracting to meet identified energy efficiency and management goals while deploying life-cycle cost effective energy and clean energy technology and water conservation measures.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Fulfill existing agency target/ commitments towards the PPCC by the end of CY16.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Evaluate 25% of agency's most energy intensive buildings for opportunities to use ESPCs/UESCs to achieve goals.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Prioritize top ten portfolio wide projects which will provide greatest energy savings potential.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Identify and commit to include onsite renewable energy projects in a percentage of energy performance contracts.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Submit proposals for technical or financial assistance to FEMP and/or use FEMP resources to improve performance contracting program.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Work with FEMP/USACE to cut cycle time of performance contracting process, targeting a minimum 25% reduction.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A
Ensure agency legal and procurement staff are trained by the FEMP ESPC/UESC course curriculum.	N/A	As a fully-leased agency, SBA has little to no control over management of the buildings in which its offices reside.	N/A

Goal 9: Electronics Stewardship & Data Centers

Electronics Stewardship Goals

E.O. 13693 Section 3(l) requires that agencies promote electronics stewardship, including procurement preference for environmentally sustainable electronic products; establishing and implementing policies to enable power management, duplex printing, and other energy efficient or environmentally sustainable features on all eligible agency electronic products; and employing environmentally sound practices with respect to the agency's disposition of all agency excess or surplus electronic products.

Agency Progress in Meeting Electronics Stewardship Goals

Procurement Goal:
At least 95% of monitors, PCs, and laptops acquired meet environmentally sustainable electronics criteria (EPEAT registered).

FY 2015 Progress: SBA does not have agency-wide systems in place to track performance for this goal.

Power Management Goal:
100% of computers, laptops, and monitors have power management features enabled.

FY 2015 Progress: SBA does not have agency-wide systems in place to track performance for this goal.

End-of-Life Goal:
100% of electronics disposed using environmentally sound methods, including GSA Xcess, Computers for Learning, Unicor, U.S. Postal Service Blue Earth Recycling Program, or Certified Recycler (R2 or E-Stewards).

FY 2015 Progress: SBA does not have agency-wide systems in place to track performance for this goal.

Data Center Efficiency Goal

E.O. 13693 Section 3(a) states that agencies must improve data center efficiency at agency facilities, and requires that agencies establish a power usage effectiveness target in the range of 1.2-1.4 for new data centers and less than 1.5 for existing data centers.

Electronics Stewardship Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Use government-wide strategic sourcing vehicles to ensure procurement of equipment that meets sustainable electronics criteria.			
Enable and maintain power management on all eligible electronics; measure and report compliance.			
Implement automatic duplexing and other print management features on all eligible agency computers and imaging equipment; measure and report compliance.			
Ensure environmentally sound disposition of all agency excess and surplus electronics, consistent with Federal policies on disposal of electronic assets, and measure and report compliance.			
Improve tracking and reporting systems for electronics stewardship requirements through the lifecycle: acquisition and procurement, operations and maintenance, and end-of-life management.			

Data Center Efficiency Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Develop, issue and implement policies, procedures and guidance for data center energy optimization, efficiency, and performance.			
Install and monitor advanced energy meters in all data centers (by fiscal year 2018) and actively manage energy and power usage effectiveness.			

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Minimize total cost of ownership in data center and cloud computing operations.			
Identify, consolidate and migrate obsolete, underutilized and inefficient data centers to more efficient data centers or cloud providers; close unneeded data centers.			
Improve data center temperature and air-flow management to capture energy savings.			
Assign certified Data Center Energy Practitioner(s) to manage core data center(s).			

Goal 10: Climate Change Resilience

E.O. 13653, *Preparing the United States for the Impacts of Climate Change*, outlines Federal agency responsibilities in the areas of supporting climate resilient investment; managing lands and waters for climate preparedness and resilience; providing information, data and tools for climate change preparedness and resilience; and planning.

E.O. 13693 Section 3(h)(viii) states that as part of building efficiency, performance, and management, agencies should incorporate climate-resilient design and management elements into the operation, repair, and renovation of existing agency buildings and the design of new agency buildings. In addition, Section 13(a) requires agencies to identify and address projected impacts of climate change on **mission critical** water, energy, communication, and transportation demands and consider those climate impacts in operational preparedness planning for major agency facilities and operations. Section 13(b) requires agencies to calculate the potential cost and risk to mission associated with agency operations that do not take into account such information and consider that cost in agency decision-making.

Climate Change Resilience Strategies

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Strengthen agency *external* mission, programs, policies and operations (including grants, loans, technical assistance, etc.) to incentivize planning for, and addressing the impacts of, climate change.	Yes	SBA is a member of the Mitigation Framework Leadership Group (MitFLG), which has coordinated an interagency effort to create the new Federal Flood Risk Management Standard (FFRMS), a flexible framework to increase resilience of federally funded projects against flooding and help preserve the natural values of floodplains.	Currently, SBA is developing its plan for implementing Executive Order 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Update and strengthen agency *internal* mission, programs, policies, and operations to align with the Guiding Principles, including facility acquisition, planning, design, training, and asset management processes, to incentivize planning for and addressing the impacts of climate change.	Yes	SBA fully considers the impacts of climate change when it conducts annual updates of its Continuity of Operations Plan and Disaster Preparedness and Recovery Plan. Climate change has been one of the elements considered as SBA has developed its Enterprise Risk Management program over the past couple of years. To date, the Enterprise Risk Board has not added a climate risk as part of its draft risk registry.	As this registry evolves into mature risk profile, in accordance with OMB guidance, SBA will continue to consider climate change as a potential source of risk for the agency.
Update emergency response, health, and safety procedures and protocols to account for projected climate change, including extreme weather events.	Yes	Yes. The SBA's Continuity of Operations planning includes consideration of impacts from severe weather events.	Each updated plan in FY 2016 and FY 2017 will include updated reviews of these impacts.
Ensure climate change adaptation is integrated into both agency-wide and regional planning efforts, in coordination with other Federal agencies as well as state and local partners, Tribal governments, and private stakeholders.	Yes	The SBA is working to provide additional resources on climate change adaptation for its Office of Field Operations staff who are located across the United States.	The SBA will develop an internal website with information and tools for field employees by the end of FY 2017.
Ensure that vulnerable populations potentially impacted by climate change are engaged in agency processes to identify measures addressing relevant climate change impacts.	Yes	The SBA has issued grants to Small Business Development Centers, SCORE offices and Women's Business Centers in 13 states impacted by Hurricane Sandy to provide business resiliency training and counseling.	The SBA is seeking to continue this program in FY 2016, but the ability to extend it is currently uncertain.

Strategy	Priority for FY 2017	Strategy Narrative	Targets and Metrics
Identify interagency climate tools and platforms used in updating agency programs and policies to encourage or require planning for, and addressing the impacts of, climate change.	No	SBA maintains a co-sponsorship with the private corporation Agility Recovery to maintain an educational website focused on business continuity planning and disaster recovery resources called PrepareMyBusiness.org. This website continues to evolve to provide the latest information to small businesses to enhance their understanding of climate change, its impacts, and, most importantly, means to offset the risks from climate change.	N/A

Appendix A

Climate Change Adaptation Plan

I. <u>Introduction and Policy Framework</u>

a. Introduction

The mission of the U.S. Small Business Administration (SBA) is to aid, counsel, assist, and protect the interests of small business concerns, to preserve free competitive enterprise, and to maintain and strengthen the overall economy of our nation. Under the direction of Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, and Executive Order 13653 Preparing the United States for the Impacts of Climate Change, the SBA continues to incorporate climate change adaptation considerations into the execution of its mission and operations. In doing so, the SBA is focusing on managing climate change related risks to its operations and missions, ensuring that its programs support climate change adaptation among the small business community and collaborating with other agencies to address climate change in an efficient and effective manner.

The results of these efforts include: the identification of existing risk management programs within the agency that may be used to address climate change related risks; preliminary risk analyses of the SBA's lending guarantee programs; a review of the SBA's Office of Disaster Assistance (ODA) programs to identify ways in which they support climate change adaptation; and the identification of several innovative programs within the Office of Entrepreneurial Development that can increase the resilience of small business and local communities in the face of climate change.

b. Policy Statement

The U.S. Small Business Administration (SBA) is committed to implementing Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, and Executive Order 13653 Preparing the United States for the Impacts of Climate Change. The Federal Government has a critical obligation to carry out climate adaptation planning because climate change directly affects a wide range of federal services, operations, programs, and assets, and has broad implications for the U.S. economy and national security. The SBA is committed to collaborating with other federal agencies, as well as partners in States, territories, local communities and tribes, to meet the challenges posed by climate change.

In light of the goals under EO 13653 there are three priority areas of consideration for the SBA:

- Encouraging resilience and preparedness among the small business community
- Ensuring SBA's lending, disaster assistance, and business development programs promote adaptation and resilience, where possible and appropriate, and do not create unnecessary barriers to adaptation
- Ensuring climate change related risks to SBA's mission, loan portfolio, and operational capacity are identified and appropriately managed

The SBA's mission is to aid, counsel, assist, and protect the interests of small business concerns, to preserve free competitive enterprise, and to maintain and strengthen the overall economy of our nation. Consequently, the SBA is uniquely positioned to promote disaster preparedness and business continuity planning among small businesses to increase their resilience to climate change. In addition, the SBA must regularly review its lending, disaster assistance, and business development programs to ensure they continue to support resilience and adaptation whenever possible.

Furthermore, the SBA must effectively identify and manage risks to the agency's programs and operations, so that the agency may continue to properly execute its mission. Using the agency's new enterprise risk management framework the SBA will evaluate risks posed by climate change on an annual basis. In addition, this framework will be supported by SBA's Continuity of Operations Plan and Disaster Preparedness and Recovery Plan. The SBA will rely on the best available science, including the most recent National Climate Assessment, to conduct its climate change risk management activities.

The SBA’s Senior Sustainability Officer is responsible for verifying implementation of all aspects of this Policy.

II. Planning for Climate Change Related Risk

In response to risk management requirements of Executive Order 13653 the SBA has taken several measures to ensure that climate change related risks are identified and assessed and that the SBA collaborates with other agencies in managing broad risks to the United States as a whole. The SBA’s risk management framework consists of three components: the Disaster Preparedness and Recovery Plan, Continuity of Operations Planning, and the new Enterprise Risk Management Program. Through these mechanisms, as well as individual meetings with different program offices, the SBA identified three impacts from climate change that needed to be analyzed to identify their implications for SBA’s mission and programs. The following impacts were identified: sea level rise and increased storm surges, increased temperatures and increased severe weather events. In addition, the SBA examined the possible impacts of climate change on the agency’s real property portfolio and identified ways in which the SBA will collaborate with other agencies to support climate change risk management across the government. The table in Appendix II summarizes many of the programs discussed in this section.

a. Climate Change Risk Management Framework

The SBA’s climate change risk management framework includes: the Disaster Preparedness and Recovery Plan, Continuity of Operations Planning, and the Enterprise Risk Management Program. In future years the Enterprise Risk Management Program, which is still currently being developed within the agency, will be the primary tool used to assess climate change related risks to the agency’s operations and programs. However, in 2014 the SBA relied more on the Disaster Preparedness and Recovery Plan, the Continuity of Operations Planning process and discussions about climate change risks with individual offices.

i. Disaster Preparedness and Recovery Plan

The SBA's Disaster Preparedness and Recovery Plan[1] (DPRP) outlines how the SBA conducts its operations in support of the national preparedness frameworks required by Presidential Policy Directive 8, National Preparedness. While the DPRP applies to events beyond the scope of climate change, such as earthquakes and terrorist attacks, it is also applicable to natural disasters influenced by climate change (e.g., wildfires and hurricanes).

When a natural disaster impacts the United States the SBA supports the economic recovery of affected communities through capital, counseling and contracting services. The ODA's Disaster Loan Program helps homeowners, renters, businesses of all sizes, and nonprofits fund their recovery. Counseling by the SBA's Office of Entrepreneurial Development and its resource partners (including Small Business Development Centers, among others) helps small businesses navigate through the recovery process. Federal contracting guidance and other SBA efforts bring business to impacted firms. The SBA uses its DPRP to ensure that the agency is prepared to provide these vital services in a timely manner. In doing so the agency undertakes risk assessments that evaluate the demands of various disaster scenarios upon the response capacity of the agency. Risk analysis and historical trends are also used to appropriately size and tailor planned responses to disasters.

SBA disaster loans are available when one or more government entities declare that a disaster has occurred. There are three ways, relevant to this Climate Change Adaptation Plan, that disaster declarations are issued to make SBA disaster loans possible: Major Disaster Declarations, Agency Physical Disaster Declarations, and Agency Economic Injury Disaster Declarations. From 1992 through 2013, SBA processed an average of 112,000 disaster loan applications per year. During that same period, SBA received more than

[1] http://www.sba.gov/content/disaster-recovery-plan

100,000 applications in nine years and exceeded 200,000 applications in three years.

The ODA makes staffing projections to estimate the human resources it will need to respond to disasters. These projections are based on the number of disaster loan applications expected, which is based on the projected number of disaster-damaged homes and businesses and the geographic range of the damage zone. SBA uses several models to make projections including:

- The Internal Demand Forecast Model – designed to estimate the dollar amount of disaster assistance loans that will be made in response to a disaster.

- The Internal Resource Requirements Model – designed to forecast the staffing levels necessary for SBA to handle a wide range of disaster events. The model forecasts the staff necessary, by specific skill area, to meet the targeted loan application review time on a weekly basis following the disaster event. The model can also be reversed to show the backlog in applications generated by a given set of available staff.

- FEMA's HAZUS – model used to evaluate the various impacts that hurricane and flood scenarios will have on different parts of the United States that SBA uses to determine the scope of its disaster response effort and to further refine its disaster response processes.

The ODA's core and term reserve staff provide initial human capital augmentation as required to manage and process the influx of loan applications following a disaster. Core reservists allow ODA to rapidly expand and subsequently contract its capacity during typical conditions. The term reserve roughly doubles ODA's capacity during more challenging disaster periods.

SBA also carefully projects the funds needed to support the Disaster Loan Program after a disaster. After initial demand levels are established through the Internal Demand Forecast Model, SBA determines whether additional (supplemental) funds are needed. If so, SBA works with the Office of Management and Budget (OMB) to request supplemental funds from

Congress. SBA's process for tracking disaster fund usage involves a coordinated effort between the ODA and the Office of the CFO (OCFO). ODA develops the initial estimates of a disaster's loan demand based on the following sources of information: estimated number of referrals from FEMA; historical average rate of applications received as a percentage of FEMA referrals; historical average rate of applications approved; historical average loan size for comparable disaster type (e.g. hurricane); and results from the Internal Demand Forecast Model.

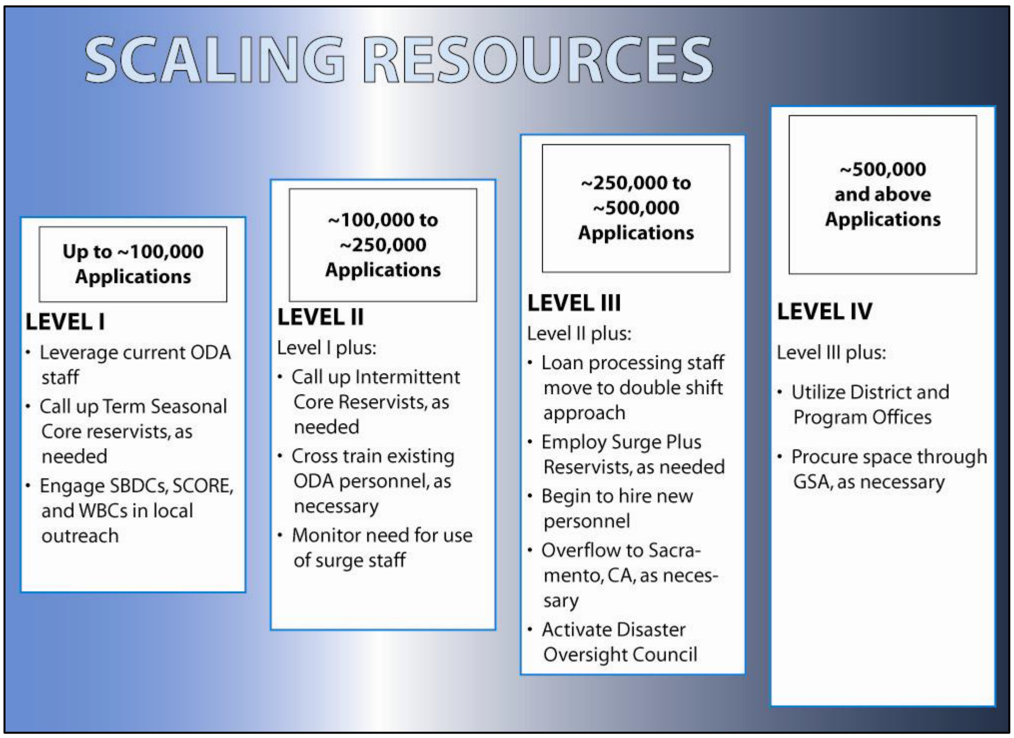
When an event occurs, SBA executives assess the situation. First, the Associate Administrator for Disaster Assistance (AA/ODA) assesses whether a disaster can be handled by ODA's internal capacity or whether the Agency must surge. ODA's internal capacity suffices for disasters that generate less than 100,000 applications (Level I – Core Capability) and disasters that generate between 100,000 and 250,000 applications (Level II – Transition to Surge).[2] If the AA/ODA decides that internal capacity will initially suffice, the members of the Executive Management Team/Disaster Oversight Council (EMT/DOC) continually monitor the situation.

If the number of expected loan applications exceeds approximately 250,000 initially or during the course of a disaster, the AA/ODA will discuss with the membership of the EMT/DOC whether to make a surge recommendation to the Administrator. Elevating the Agency to a surge level of response is a specific decision to be made by the Administrator after considering the overall nature of the disaster. SBA operates at surge capacity during and after disasters that generate more applications than supportable by ODA's internal capacity of approximately 250,000 applications. While the 2005 Gulf Coast Hurricanes represent the highest level of disaster activity that SBA has faced to date, the Agency is prepared to serve the needs of disaster victims at even greater levels of disaster activity.

[2] See Figure 1 below.

In summary, the DPRP documents the risk management framework used by the agency to project and calibrate its disaster response capacity, particularly for the ODA. Because of the known and potential influence of climate change on natural disaster frequency and strength, this tool is critical to ensuring the agency can respond appropriately to disasters and increase the resilience of impacted communities

Figure 1: Office of Disaster Assistance Scaling



ii. Continuity of Operations Planning

The SBA holds 187 leases for offices in 160 cities spread across the United States, the U.S. Virgin Islands, Puerto Rico and Guam. The risk climate change poses to these facilities is as varied as the locations themselves. Nonetheless, SBA is prepared to face climate change based risks related to natural disasters in each of these locations through the

Agency COOP planning structure. Each facility has a tailored plan designed to address its specific security and disaster response needs. Relevant components of these plans include: a threat assessment that looks at man-made and natural threats to the location; the identification of and plans for continuation of SBA's Mission Essential Function(s)[3]; the designation of alternate operating sites and/or processes; emergency test requirements; the classification of emergency levels; a COOP implementation checklist; an occupant emergency plan; and an emphasis on telework as a strategy for mitigating the impacts of an event. Should a climate change influenced event impact a particular SBA facility, the plan for that facility would govern the response.

Similarly, COOP planning also addresses employee and public health and safety risks. The plans prepare for the immediate and lingering impacts of a natural disaster in the manner described above. In addition, the plans include information about support for SBA victims of disaster and emergency family support. Should members of the public be in an SBA facility during an event, the plans account for protecting the safety of both the public and employees. By ensuring that each of the SBA's facilities is prepared for the impacts of a disaster, the COOP planning structure ensures the SBA will be able to continue to provide key services to the public in the face of climate change. Furthermore, the COOP

[3] The seven SBA MEFs are: (1) Declare disasters, process applications for disaster loans from individuals and businesses, and disburse approved loans. (2) Issue acceptance letters to procuring Federal agencies in response to offering letters submitted under the 8(a) Business Development Program and negotiate and execute 8(a) contracts. (3) Servicing and liquidation of all SBA direct and guaranteed loans made pursuant to the Small Business Act and servicing and management of SBA surety bond guarantees issued pursuant to the Small Business Investment Act. (4) Process and approve SBA guaranteed loans made by delegated and non-delegated lenders pursuant to Section 7(a) of the Small Business Act and process and approve loans made by Certified Development Companies pursuant to Section 504 of the Small Business Investment Act and approve and administer SBA surety bond guarantees pursuant to Section 411 of the Small Business Investment Act. (5) Receive, evaluate and forward for disbursement requests from resource partners for payment. (6) Issue Approval Notices for Small Business Investment Companies to allow for investments into small businesses. (7) Approve the repurchase of debentures pursuant to SBA's guarantee upon demand.

planning process allows for early identification of increasing risks requiring additional mitigation.

iii. Enterprise Risk Management

In FY 2014 the SBA initiated an enterprise risk management framework. The enterprise risk management (ERM) function resides in the SBA's Office of the Chief Operating Officer, and it works to identify and assess risk across the Agency. As part of its risk assessment activities, the ERM function identifies risks—including climate-related risks—to the agency's mission, its strategic objectives and its Mission Essential Functions, and coordinates the assessment of these risks.

In FY 2014 the SBA performed its risk assessment process in relation to climate change outside of the ERM program on an office-by-office basis because the ERM program was still in development. However, in FY 2015 and all future years the SBA will use the ERM program as the primary mechanism for identifying, prioritizing and monitoring risks to the agency from climate change, alongside other risks to the agency. All major risks to the agency – including risks related to climate change – will be documented in a single comprehensive risk register.

b. Identification and Assessment of Climate Change Related Risks and Impacts

This Adaptation Plan has identified the following impacts that are particularly relevant to the agency's mission, programs and/or operations: sea level rise and storm surges; temperature increases; and increased severe weather events.[4] These impacts

[4] The SBA considered including shifts in pests, pathogens and diseases, but upon analyzing the information in the 2014 National Climate Assessment "Human Health" chapter the SBA determined that there were not enough specific risks to the agency to warrant further analysis. This risk may need to be revisited in future years as further research is conducted.

and the risks associated with them were identified through cross-agency meetings with representatives from each of the SBA's program offices, as well as one-on-one follow-up meetings with offices that identified programs that were likely to be impacted by climate change.

These impacts were identified and are assessed based on the following factors (in no particular order):

i. The ability of the impact to affect the SBA's leased office facilities
ii. The ability of the impact to affect the SBA's staff
iii. The ability of the impact to affect loans guaranteed by the SBA
iv. The ability of the impact to affect the SBA's Office of Disaster Assistance programs
v. The ability of the impact to significantly affect the small business community

These factors were selected based on the following rationale: The SBA is an agency whose primary operational assets are leased offices buildings and their associated furnishings, therefore the SBA is focusing on impacts to those assets. In addition, any impact that affects the employees of an agency always warrants consideration. From a program and mission perspective, the SBA is focusing on three areas that tie into the core mission of the agency: access to capital for small businesses, disaster lending, and small business counseling and education. No risk identified here is deemed so significant that it impairs a statutory mission or operation of the SBA.

i. Sea Level Rise and Increased Storm Surges

Recent projections have demonstrated that even the lowest amount of emissions will still result in at least 11 inches of sea level rise by 2100, and that is without any contribution from the Greenland and Antarctic ice sheets. This means that a 1 foot global sea level rise by 2100 is a plausible low estimate and as much as a 4 foot rise is a possible high estimate. This becomes increasingly dangerous as about 5 million people live within the areas affected in the U.S. by a 4 foot increase to local high tide levels. Likewise, sea level rise poses a risk for more than 5,790 square miles of coastal property valued at $1 trillion. This property would be inundated by two feet of water above current levels by 2050. About half of the most vulnerable property is in Florida while the most vulnerable cities include Miami, the Greater New York metropolitan area, New Orleans, Tampa-St. Petersburg, and Virginia Beach.

Sea level rise not only poses a threat for coastal residents, but also for increased coastal erosion, changes in sediment transport and tidal flows, more frequent flooding from storm surges, landward migration of barrier shorelines, fragmentations of islands, and saltwater intrusion of aquifers and estuaries. That being said, sea level rise among the coastlines of the United States is not uniform and can be exacerbated by subsidence (sinking land), or reduced by uplift.[5]

Flooding from storm surges is an increasing concern as well. Approximately 8.6 million Americans or 2.8% of the US population lived within areas vulnerable to coastal floods in 2010. Even more concerning, over 120 million Americans live in counties located near an oceanic or Great Lake coastline that has a 100 year coastal flood plain located within it. The continuing immigration of people to these coastal areas exacerbates the issue. Since 1980, there has also been increased storm activity, specifically along the Northeast and Northwest coastlines. Coastal areas will also see heavier runoff from inland areas. Changes in coastal areas because of climate change are threatening economic activity that accounts for approximately 66 million jobs and $3.4 trillion in wages in shoreline counties in 2010. Furthermore, coastal recreation and tourism have proven to be the largest and fastest growing sectors in the United States service industry and bring in 85% of the country's $700 billion in tourism revenue every year. [6]

The following table summarizes the implications of sea level rise for the SBA:

[5] Source: 2014 National Climate Assessment, "Our Changing Climate," "Oceans" and "Coasts" chapters.
[6] Source: 2014 National Climate Assessment "Oceans" and "Coasts" chapters.

Impacted Office(s)	Potential Risks	Risk Assessment Results	Mitigation Measures
Office of Disaster Planning & Risk Management; Office of Administrative Services	Sea level rise and storm surges may threaten SBA's facilities in coastal cities and on islands.	Incremental sea level rise is unlikely to directly impact SBA's facilities that consist of short-term leased office space acquired through GSA. Storm surges may impact a subset of SBA's facilities that are located in areas prone to hurricanes. [7]	SBA's Continuity of Operations Plan has assessed risks to SBA's Missions Essential Functions from hurricanes and established mitigating measures. In addition, the Office of Administrative Services will work with the GSA to ensure SBA's leased facilities are not vulnerable to sea level rise and storm surges.
Office of Capital Access	Sea level rise and storm surges may create increased risks within SBA's 7(a) and 504 lending guaranty portfolios, particularly for loans within coastal communities or highly impacted sectors such as coastal tourism and fisheries, among others.	Because of the lack of current tools that can identify location specific risks (down to the zip code level) from future sea level rise and storm surges for a large quantity of data points, it is challenging for the SBA to accurately assess the risks to its existing portfolio. However, the Office of Credit Risk Management performed a preliminary analysis of the percentage of the SBA's portfolio that is composed of 'industries with high climate risk' and determined that only 2.6% of SBA's 7(a) loans and 1.8% of SBA's 504 loans fall within these industry classifications.	Prudent lender underwriting, servicing, and liquidation practices are the responsibility of the participating lenders and it is their expertise and local borrower and environmental knowledge that must primarily inform the prudent lending practices necessary to protect adequately against the threats caused by climate change. In addition, the SBA requires several forms of insurance[8] to further reduce the financial risk to the agency from a variety of weather events.
Office of Disaster Assistance (ODA)	Increasingly damaging storm surges may increase demand for ODA's resources.	According to the SBA's Disaster Preparedness and Recovery Plan, storm surges from hurricanes are one of the most damaging types of events that trigger a response from ODA.	As documented in the Disaster Preparedness and Recovery Plan, ODA runs several forecasts of demand for their services and has in place a rigorous system for increasing their capacity to respond to events, including events that are bigger than the largest response efforts conducted by the agency to date.

[7] National Capital Region, Puerto Rico, US Virgin Islands, Lower Rio Grande Valley, North Florida, South Florida, Hawaii, Houston and Louisiana.

[8] Hazard insurance is generally required for all assets pledged as collateral for business loans. In addition, businesses must provide proof that they meet the additional insurance requirements of their state (wind, etc.). Marine vessels and related collateral must have marine insurance. In general, flood insurance is required for any collateral located in a Special Flood Hazard Area. There are limited exceptions to these requirements.

ii. Temperature Increases

The most recent decade was the warmest on record for the United States and warming is predicted to continue throughout this century. Average temperatures are predicted to increase 2-4 ° F in most areas of the United States over the next few decades and between 3-10 ° F by the end of the century, depending on the actual level of greenhouse gas emissions. The largest temperature increases are projected to occur in the upper Midwest and Alaska.[9]

A warming climate brings with it impacts on energy usage and human health. If the nation's climate warms by about 2°F, the demand for energy used for cooling would increase by about 5-20%, while the demand for energy used for heating would decrease by about 3-15%. Warming is likely to increase summer peak electricity demand in most regions of the United States. In addition, climate change will likely lead to more frequent, more severe, and longer heat waves in the summer, as well as less severe cold spells in the winter. The impacts of future heat waves could be especially severe in large metropolitan areas. For example, in Los Angeles, annual heat-related deaths are projected to increase two- to seven-fold by the end of the 21st century, depending on the future growth of greenhouse gas emissions. Heat waves are also often accompanied by periods of stagnant air, leading to increases in air pollution and the associated health effects. [10]

Increasing temperatures will impact some small businesses across the country, particularly those businesses related to agriculture and fisheries. For any particular crop, the effect of increased temperature will depend on the crop’s optimal temperature for growth and reproduction. In some areas, warming may benefit the types of crops that are typically planted there. However, if warming exceeds a crop’s optimum temperature, yields can decline. Likewise, the ranges of

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[9] Source: 2014 National Climate Assessment, “Our Changing Climate” chapter. The regions are pulled from the 2014 National Climate Assessment. Page 369 of the Assessment includes a map.
[10] Source: http://www.epa.gov/climatechange/impacts-adaptation/energy.html; http://www.epa.gov/climatechange/impacts-adaptation/health.html#impactsheat

many fish and shellfish species may change. Many marine species have certain temperature ranges at which they can survive.[11]

The following table summarizes the implications of temperature increases for the SBA:

Impacted Office(s)	**Potential Risks**	**Risk Assessment Results**	**Mitigation Measures**
Office of Human Resource Solutions	Severe heat events may pose health and safety risks to SBA's employees such as heat stroke and asthma related illnesses.	Because the SBA's employees work in climate-controlled office environments, severe heat does not pose a major threat to employee wellness during work hours. However, it is conceivable that severe heat events and the associated poor air quality may impact employee absenteeism.	If extreme heat events and poor air quality increasingly impact the SBA's employees, the SBA has multiple tools in place that could be used to provide assistance. These tools include: the SBA's Work Life Wellness program which promotes employee health through seminars and events; the SBA Daily e-mail notice system which could be used to disseminate basic health information; and the Federal Occupational Health Employee Assistance Program.[12]
Office of Administrative Services	Energy efficiency and back-up power generation may become increasingly important for facilities occupied by the SBA.	While extreme heat events and energy demand surges are unlikely to directly disrupt the SBA's operations on a large scale, some local SBA offices may be impacted.	The SBA is currently seeking to improve the energy efficiency of its sites by collaborating with the GSA as part of the agency's sustainability goals. The SBA will also work with the GSA to ensure that back-up power generation is available for SBA's mission critical facilities.
Office of Capital Access	The impacts of temperature increases on agriculture and fisheries may pose risks to SBA's loan guaranty portfolios.	The Office of Credit Risk Management performed a preliminary analysis of the percentage of the SBA's portfolio that is composed of 'industries with high climate risk' and determined that only 2.6% of SBA's 7(a) loans and 1.8% of SBA's 504 loans fall within these industry classifications which included industries related to agriculture and fisheries.	Prudent lender underwriting, servicing, and liquidation practices are the responsibility of the participating lenders and it is their expertise and local borrower and environmental knowledge that must primarily inform the prudent lending practices necessary to protect adequately against the threats caused by climate change. The SBA also has a variety of tools in place to monitor risks to the SBA's loan

[11] http://www.epa.gov/climatechange/impacts-adaptation/agriculture.html

[12] Notably, heat related illnesses are not addressed by this site (which is not controlled by the SBA). The SBA would be supportive of adding heat related illness information to the site. Asthma is addressed by the site, but only briefly. The SBA would be supportive of adding additional information regarding asthma to this site.

			guaranty portfolio.

iii. Increased Severe Weather Events

Climate change impacts severe weather in a variety of ways. For instance, the intensity of hurricanes is likely to increase. Since 1980, hurricane activity in the Atlantic has been increasing in terms of intensity, frequency, duration, and the number of Category 4 and Category 5 storms. These increases are due, in part, to higher water surface temperatures in the Atlantic where storms take form. As ocean temperatures continue to increase in the future, it is likely that hurricane rainfall and wind speeds will increase. Simulation models suggest for each 1.8˚F increase in tropical sea surface temperatures, core rainfall rates from hurricanes will increase by 6 to 8 percent and the surface wind speeds of the strongest hurricanes will increase by approximately 1 to 8 percent. In the eastern Pacific, severe hurricanes have become stronger since the 1980s, although the total number of storms has decreased.[13]

Floods and droughts are also likely to become more common and more intense. The frequency and intensity of heavy downpours have been increasing nationally over the last three to five decades, especially in the Midwest and Northeast portions of the United States.[14] The heaviest precipitation events have also seen an increase in their number and magnitude. These are predicted to increase the risk for flash flooding, which impacts land cover, flow and water-supply management, soil moisture, channel conditions and ground water aquifers. Floods will also decrease shipping through waterway closures and damages to ports and locks. More frequent heavy downpours and floods in urban areas, and more extensive coastal flooding will cause greater property damage, thus creating a heavier burden on emergency responders, and a growing financial toll on

[13] Source: 2014 National Climate Assessment, "Our Changing Climate" chapter; http://www.fema.gov/pdf/about/programs/oppa/climate_change_paper.pdf

[14] These regions are pulled from the 2014 National Climate Assessment. Page 369 of the Assessment includes a map.

businesses and homeowners. The flood insurance program is already shifting through updated flood maps and other policies may have to be reevaluated. [15]

At the same time, droughts are also lengthening, especially in the southern and northwestern regions. Short term dry spells are projected to intensify in all areas of the United States while longer ones are expected to intensify in the Southwest, Southern Great Plains, and the Southeast.[16] Both floods and droughts will impact transportation through disruptions to rail and road traffic, thus increasing shipping costs. In addition, many parts of the country rely on ground water aquifers as their only water source and are extremely susceptible to these changing climate conditions in regards to their available water supplies.[17]

More broadly, many scientists and emergency managers recognize that other kinds of extreme weather events are also intensifying. They see the effects of climate change in events such as intensified wildfires, windstorms, and heat waves. There have been a number of record-setting severe weather events, from the Australian bushfires in February 2009, when hundreds of fires broke out during record-breaking temperatures, to the May 2010 flooding in Tennessee, which was the highest since recordkeeping began there in the 1880s. There has also been an increase in the frequency of winter storms across the entire Northern Hemisphere. While extremely heavy snow storms have increased since 1950, in the northern and eastern parts of the United States, the number has gone down since 2000. However, this is still on trend with the inconsistent pattern of heavier-than-normal snow falls in some years and little to no snow in other years. [18]

The following table summarizes the implications of increased severe weather for the SBA:

[15] Source: 2014 National Climate Assessment, "Water" chapter ; http://www.fema.gov/pdf/about/programs/oppa/climate_change_paper.pdf
[16] These regions are pulled from the 2014 National Climate Assessment. Page 369 of the Assessment includes a map.
[17] Source: 2014 National Climate Assessment, "Water" chapter
[18] Source: 2014 National Climate Assessment, "Our Changing Climate" chapter; http://www.fema.gov/pdf/about/programs/oppa/climate_change_paper.pdf

Impacted Office(s)	**Potential Risks**	**Risk Assessment Results**	**Mitigation Measures**
Office of Disaster Planning & Risk Management; Office of Administrative Services	Severe weather may impact the SBA's facilities.	Many of SBA's facilities are located in areas that may be impacted by severe weather including hurricanes, fires, floods, and winter storms.	SBA's Continuity of Operations Plan has assessed risks to SBA's Missions Essential Functions from severe weather and established mitigating measures. In addition, the Office of Administrative Services will work with the GSA to ensure SBA's facilities are not vulnerable to severe weather events.
Office of Disaster Assistance	Increased numbers of severe weather events may increase demand for ODA's resources.	While the total number of major declared disasters has increased over time,[19] this has not entirely correlated to increases in volumes of approved home and business disaster loans.[20] Home and business loan volumes are also not entirely correlated to each other.	As documented in the Disaster Preparedness and Recovery Plan, ODA runs several forecasts of demand for their services and has in place a rigorous system for increasing their capacity to respond to events, including events that are bigger than the largest response efforts conducted by the agency to date.
Office of Capital Access	Increased severe weather events may pose risks to SBA's loan guaranty portfolios.	The Office of Credit Risk Management ran an analysis comparing the location of SBA's 7(a) and 504 loan guaranties to locations where a presidential declaration for a major disaster in a climate change relevant category[21] was declared in the last 20 years at the county level. This analysis failed to yield very useful data for targeted risk mitigation because the vast majority of counties where SBA's loans are located have	Prudent lender underwriting, servicing, and liquidation practices are the responsibility of the participating lenders and it is their expertise and local borrower and environmental knowledge that must primarily inform the prudent lending practices necessary to protect adequately against the threats caused by climate change. Furthermore, the diversity of SBA's loan guaranty portfolio at a geographic and industry level helps to protect it from risk from

[19] According to data from FEMA the average number of major *declared* disasters per year was 33 in the 1970s, 24 in the 1980s, 46 in the 1990s and 56 in the 2000s. Source: http://www.fema.gov/disasters/grid/year.

[20]

	Total # of Approved Business Loans	***Total # of Approved Home Loans***
2000s	73,519	362,726
1990s	111,698	359,262
1980s	33,093	148,882
1970s	65,038	559,583

[21] Coastal storm, fire, fishing losses, flood, hurricane, severe storm, tornado.

		experienced a declared disaster in the last 20 years.	an individual event. In addition, the SBA requires several forms of insurance[22] to further reduce the financial risk to the agency from a variety of weather events.

c. Climate Adaptation Considerations for the SBA's Supply Chain and Real Property

The SBA is a relatively small agency that occupies leased space acquired through the GSA and conducts routine procurements to maintain an office environment such as desktop computers, software systems, telecommunications systems and office furniture. Given these considerations, the SBA does not see a significant need at this time to conduct rigorous adaptation planning for its real property acquisitions, nor its procurement supply chain. Nevertheless, there are some limited measures the SBA has undertaken that may facilitate adaptation. For instance, in Annex B of the SBA's 2014 Continuity of Operations Plan, the SBA has determined which of the SBA's facilities house operations that are important to the execution of the agency's Mission Essential Functions and assessed their vulnerability to severe weather events. The assessment also identified the mitigating factors present that will ensure that no failure of a Mission Essential Function will occur.

In the future, it is possible that the SBA could use this assessment to inform future discussions with the GSA about the climate change resilience needs for SBA's leased facilities. In fact, during FY 2014 SBA engaged with GSA to discuss institution of such a system that takes climate change adaptation into account as part of its leasing program. Regarding acquisitions, the SBA has not identified any supply chain categories that are particularly vulnerable to climate change at this time. At this time the SBA is primarily interested in learning from other agency experiences regarding supply chain analyses.

[22] See footnote 7.

d. Contributions to Coordinated Interagency Efforts

Several of the SBA's programs discussed in this Plan already involve interagency coordination including the Interagency Network of Enterprise Assistance Providers (INEAP), the Economy, Energy and Environment (E3) program and ODA's disaster loan activities which are frequently coordinated with FEMA and other emergency response agencies. The SBA also participates in the following interagency forums related to climate change:

- Federal Climate Adaptation Community of Practice
- Council on Climate Preparedness & Resilience
- Inter-Agency Forum on Climate Change Impacts & Adaptations

In addition, the SBA recently sent three participants to the Climate Change Adaptation Planning Workshop that was facilitated by the National Exercise Program. The SBA plans to continue its involvement in these forums and would be interested in opportunities to participate in regional forums as well as the interagency community develops them.

III. Modernizing Federal Programs and Policies to Support Climate Resilient Investment

a. Supporting and Encouraging Climate Change Resilience

Executive Order 13653 requires that all agencies identify opportunities to support and encourage climate resilient investments by States, local communities, and tribes. In response to this requirement the SBA is focusing on ways to support climate resilience among the small business community that the agency and its resource partners serve. The table in Appendix I summarizes many of the programs discussed in this section.

i. Office of Disaster Assistance Programs

The Office of Disaster Assistance's (ODA) mission is to provide affordable, timely and accessible financial assistance to homeowners, renters and businesses following a declared disaster. SBA's low-interest disaster loans are the primary form of federal assistance for the repair and rebuilding of non-farm, private sector disaster losses. For this reason, the disaster loan program is the only form of SBA assistance not limited to small businesses. As of March 2014, ODA has approved nearly 2 million loans that are cumulatively worth over $53 billion since SBA's inception in 1953.

(1) Disaster Loan Programs

In light of the impact of climate change on extreme weather events, SBA's disaster loan programs will continue to be important to the economic recovery of communities impacted by natural disasters. The SBA manages two loan programs that support economic recovery after a declared natural disaster: the Physical Disaster Loan program and the Economic Injury Disaster Loan (EIDL) program. These programs are available to disaster victims located in geographic areas that have been officially declared disaster areas. Different types of disaster declarations provide authority for different loan programs. Major disasters declared by the President trigger the Physical Disaster Loan program and EIDL program, as well as a variety of other support from other agencies. Physical disaster declarations by the SBA Administrator trigger the Physical Disaster Loan program and EIDL program. Economic injury disaster declarations by the SBA Administrator issued in response to a declaration by the Secretary of Agriculture or in response to a request by a governor trigger the EIDL program only.

A disaster is defined as a sudden event which causes severe damage. Disasters that may be declared by the SBA Administrator include, but are not limited to: floods, hurricanes, tornadoes, earthquakes, fires, explosions, volcanoes, windstorms, landslides or mudslides, tidal waves, commercial fishery failures or fishery resource disasters (as determined by the Secretary of Commerce under section 308(b) of the Interjurisdictional Fisheries Act of 1986), ocean conditions resulting in the closure of customary fishing waters, riots, civil disorders or other catastrophes. In addition, the SBA

Administrator can issue economic injury disaster declarations for drought and below average water levels in the Great Lakes, or on any body of water that supports commerce by small business concerns.

Physical Disaster Loans may be available to businesses of any size, nonprofit organizations, rental property owners, homeowners and tenants in rental properties as long as the applicants meet specific eligibility criteria.[23] Physical Disaster Loans are not available to agricultural enterprises such as agricultural producers, farmers or ranchers. SBA is prohibited by law from providing assistance to applicants whose losses are covered by insurance or other compensation.

In comparison, the EIDL program is only available to small business concerns that meet the size standard for their industry, small agricultural cooperatives, small businesses engaged in aquaculture and most private nonprofits. These entities must be located in the declared disaster area and have suffered, or are likely to suffer, substantial economic injury as a result of the disaster. They must also be unable to obtain credit elsewhere. SBA is prohibited by law from providing assistance to applicants whose losses are covered by insurance or other compensation.

In general, Physical Disaster Loans provide funds for the repair or replacement of disaster damaged property. The objective is to restore the property to its predisaster condition. Any improvement beyond predisaster condition is upgrading, and is not eligible. However, certain exceptions are authorized on a case-by-case basis, including a variety of efforts to mitigate damage from future disasters. For example, all property repaired or acquired with disaster loan proceeds must meet applicable building codes in effect at the time the necessary permits are obtained. The cost of making improvements to meet code requirements, including requirements for mitigating measures and protective devices necessary to obtain a permit or other similar approval to make repairs is eligible, although upgrades

[23] 13 CFR Part 123 has additional details about eligibility and other critical aspects of the disaster loan programs

necessary to meet building codes are not eligible for any relocation loans. Protective devices or mitigation measures in place before the disaster are also eligible for repair or replacement.

In some circumstances, additional protective devices and mitigation measures not in place prior to the disaster and not required by applicable building codes are eligible improvements under the Physical Disaster Loan program. Eligibility is based on the need for adding such a device or measure. Examples of these devices or measures include, but are not limited to: (1) Retaining walls; (2) Fences; (3) Seawalls or bulkheads; (4) Relocating utilities; and (5) Modifying structures. Modifications to protect personal property only are not eligible.

Notably, eligibility is exclusive to the damaged property and does not transfer if the applicant relocates. SBA cannot approve a loan for post-disaster mitigation only. The maximum eligible cost for post-disaster mitigation is 20 percent of the verified physical loss (before any duplicated benefits are deducted), and the total amount of the loan cannot exceed $200,000 for home loans and $2,000,000 for business loans. The proposed device or measure must protect or mitigate against damage from the same type of occurrence as the declared disaster (e.g., protection against future flood damage when the disaster was a flood).

The following table summarizes the usage of Physical Disaster Loans for mitigation and forced elevation[24] between Fiscal Years 2009 and 2013 as of March, 2014:

[24] Loans for forced elevation refer to funds required to meet flood mitigation requirements to meet a building code or to obtain a building permit.

Fiscal Year	Mitigation (# of Loans)	Mitigation ($ Approved)	Forced Elevation (# of Loans)	Forced Elevation ($ Approved)		Total ($ Approved)
2013	461	$10,774,940	627	$31,015,078		$41,790,018
2012	314	$2,392,800	58	$2,338,700		$4,731,500
2011	297	$2,492,500	21	$544,900		$3,037,400
2010	487	$4,712,300	29	$1,638,600		$6,350,900
2009	207	$3,736,000	66	$2,651,481		$6,387,481
Total	1,766	$24,108,540	801	$38,188,759		$62,297,299

In some cases disaster loans may be used to relocate and/or to add future disaster mitigation features to a property. Physical Disaster Loan funds may be used to relocate. By law, however, Physical Disaster Loan funds may not be used to relocate voluntarily outside the business area[25] where the disaster occurred. In cases of mandatory relocation, such as a refusal by the local government to permit rebuilding, among others, the loan may be used to relocate outside of the business area. Likewise, in cases of involuntary relocation[26] the loan may be used to relocate outside of the business area. In contrast, EIDL loans are for working capital purposes and may <u>not</u> be used to pay for the relocation of the business or business assets.

[25] Business area means the municipality that provides general governmental services to the damaged business or home. If not located within a municipality that provides general governmental services, then business area means the county or equivalent political entity in which the damaged business or home is located.

[26] Includes: (1) demonstrable risk that the business area will suffer future disasters; (2) change in employment status, such as employment transfers, loss of job, relocation for a new job, or lack of adequate job opportunities in the business area, or the implementation of scheduled retirement plans…; (3) medical reasons; (4) special family considerations…; (5) elimination or substantial decrease in the market for the business product or service as a consequence of the disaster; (6) change in the demographics of the business area …which makes it uneconomical to continue the business in the business area; (7) substantial change in business costs…(8) location of the business un a hazardous area such as a Special Flood Hazard Area; (9) change in the public infrastructure in the business area…(10) implementation of decisions adopted and partially implemented…to move the business out of the business area for good; or (11) other factors which undermine the economic viability of the business area.

The Physical Disaster Loan program may also be used to restore land associated with a primary residence or business operation. Most damage of this type is caused by flooding or other forms of moving water. Soil washouts and similar damages caused by excessive rainfall and flooding are eligible provided the cause is a direct result of the specific declared disaster. However, erosion or similar damage is not eligible, because it occurs over time and is not the direct result of any single declared disaster event. In order to approve funds to restore land damage ODA staff must consider the potential for recurring or continuing damage. Funds may be approved when: A shoreline or waterway boundary is stable to the point that future water damage is not likely to occur as the result of high tides, wind-driven water, wave action, or stream flows which might reasonably be expected but which would not constitute a new disaster declaration; or the applicant has used other resources to fund the installation of protective devices which will prevent expected high tides, wind-driven water or wave action, or stream flows from causing further land damage.

The disaster loan program's insurance requirements may also improve the resilience of communities rebuilding after a disaster. Two different kinds of insurance may be required: hazard insurance and flood insurance. The SBA does <u>not</u> require EIDL recipients to obtain business interruption insurance. The SBA requires hazard insurance on all secured loans to protect both the damaged property (real property and contents) and all insurable collateral. Depending on the type of loan and property involved the hazard insurance may also need to cover unsecured inventory. The hazard insurance purchased by the loan recipient must include coverage for the peril that caused the damage and the peril for which the disaster was declared, unless the common practice of mortgage lenders in the disaster area vary in their standard practice regarding this requirement.

The National Flood Insurance Program (NFIP) administered by the Federal Emergency Management Agency, provides standards that guide flood insurance requirements for SBA disaster loans. When an applicant applies for a disaster loan the SBA determines whether the property they will rebuild or relocate to is located in a Special Flood Hazard Area (SFHA). The SBA requires flood insurance on property within an SFHA[27] which can be insured in the following manners:

- For a homeowner, the property subject to the flood insurance requirement includes the residence, contents (personal property), and appurtenant structures;
- For a residential tenant, the property is the contents (personal property);
- For a business which operates in its own building, the property is the building, contents, and appurtenant structures; and
- For a business which operates in a leased location, the property is the business contents. When the borrower owns the structure on leased land we will require the borrower to obtain flood insurance on the leasehold improvements.

In addition, as a matter of policy, even if flood insurance is not required by the Flood Disaster Protection Act of 1973, the SBA will require flood insurance for applicants receiving Physical Disaster Loans when:

- Rising water caused the flood damage[28]; and
- The flooding caused damage to insurable real property and/or contents (including basements of insurable structures); and
- The borrower owns the real property that has been damaged by the flood or is responsible for making repairs to the damaged property.

Even if the flood damaged property is not taken as collateral, the damaged property must still be covered by flood insurance.

Likewise, for EIDL recipients flood insurance is required for credit reasons if the business location is not taken as collateral, but is in an SFHA or has been repeatedly flooded. Furthermore, ODA staff have discretion to require flood insurance when the disaster-damaged property is not located in an SFHA, but is subject to risk of flood loss (e.g., the loan is to repair flood damage, such as machinery and equipment, etc., or the property has been repeatedly flooded). In certain circumstances, failing to obtain flood

[27] Note: when NFIP Nonparticipating Communities and Communities Under Sanction are involved additional complexities arise.

[28] However, flood insurance is not required if the cause of the flooding would not have been covered by NFIP flood insurance

insurance prior to a disaster can also disqualify an applicant from obtaining an SBA loan (if flood insurance was required by a previous loan obtained through an SBA program, if insurance was required because the property is in an SFHA, etc.)

(2) Disaster Preparedness Outreach

The Office of Disaster Assistance also conducts outreach activities to the small business community to assist them with disaster preparedness and business continuity. For example, in June 2010 the SBA entered into a co-sponsorship agreement with the private contractor Agility Recovery to establish an educational website focused on business continuity planning and disaster recovery resources for small businesses called PrepareMyBusiness.org. [29] The site includes:

- Home Page: introduction, importance of preparedness planning, small business owner recovery stories.
- Disaster Resources Page: content provided by SBA including information on disaster assistance and disaster loans, etc.
- Education Page: highlighted educational webinars and provide links to archived Webinars.
- Planning Page: content provided by Agility Recovery Solutions including planning tool kit, and over 20 checklists including: risk analysis, critical business functions, vendor relationships, supplies and preparedness checklists for individual natural disasters.
- Testing Page: content provided by Agility Recovery Solutions including best practices for testing of preparedness plans and potential testing scenarios.

The SBA and Agility Recovery Solutions also cosponsor an educational webinar series focused on business continuity planning and disaster recovery topics that are important for any small business owner. Topics include:

- Crisis Communications
- Testing Your Recovery Plan
- Protecting Your Business During Hurricane Season

[29] http://www.preparemybusiness.org/

- Ten Steps to Business Preparedness
- Role of Social Media in Disaster Recovery
- SBA Disaster Assistance Programs
- National Preparedness Month (One Webinar a week in September)
- Start Building Your Disaster Recovery Plan Today
- Supply Chain Management
- Winter Weather Preparedness
- Top 10 Mistakes Made During a Crisis

In 2012 the average monthly webinar registration was 655 individuals, with 395 average monthly attendants. Last year the average monthly webinar registration was 528, with 261 average monthly attendants.

In addition, the SBA's ODA Public Information Officers (PIOs), who are located in regions across the U.S., regularly provide information, answer questions and make presentations to inform, discuss and promote disaster preparedness. They share this knowledge with chambers of commerce, service organizations, trade and homeowners associations, Congressional staff, and officials from federal, state and local governments. PIOs explain that disaster preparedness for businesses and residents includes assessing risks and making a plan to respond to potential impacts. They recommend that businesses should identify potential impacts on staff, customers, suppliers, inventory, cash flow, communications, information technology, and equipment that are necessary to keep businesses operating. They also recommend that residents should plan for disaster impacts to their home and family. Residents and business owners are urged to review and update insurance, financial and other resources to provide the necessary means to sustain their families and businesses. Finally, PIOs suggest that businesses should also have a plan to shelter employees in place until a disaster has passed.

ii. Programs in the Office of Entrepreneurial Development

The Office of Entrepreneurial Development's mission is to help small businesses start, grow, and compete in global markets by providing quality training, counseling, and access to resources. A major component of the Office of Entrepreneurial Development's work is carried out through grantee resource partners including Small Business Development Centers (SBDCs)[30], Women's Business Centers (WBCs)[31] and National SCORE Association[32] offices.

(1) E3: Economy, Energy and Environment Program

The SBA is one of six agencies that support the E3 Economy, Energy and Environment program[33]. The E3 program is a coordinated federal and local technical assistance initiative that helps communities work with their manufacturing base to adapt and thrive in a new business era focused on sustainability. E3 provides a comprehensive set of loan guarantee programs for small to medium sized manufacturers, who would like to make environmental, energy and lean improvements to their facility based upon E3 technical assessment reports. The SBA and local Small Business Development Centers work in tandem to recommend manufacturers to the program.

In addition, manufacturers may use the SBA's loan programs to achieve its goals within the E3 program. The SBA's 504 loan program provides long-term, fixed asset financing for small manufacturers of up to $5.5 million (per project). SBA's 7(a) loan program also provides guaranteed loans for small manufacturers for general business purposes, including the purchase of equipment and working capital up to $5 million. Upon completing an E3 assessment, the E3 team presents to the facility a list of recommendations, many of which can be implemented only with financial assistance. SBA can work with the company to locate guaranteed loans for specific recommendations. In addition, a local SBDC can help businesses: identify how equipment retrofitting can be integrated into their profit plan; provide services related to energy efficiency and green buildings for small businesses through energy competitive grants; rate manufacturing facilities as to their financial/business readiness for an E3 assessment;

[30] http://www.sba.gov/content/small-business-development-centers-sbdcs
[31] http://www.sba.gov/content/women%E2%80%99s-business-centers
[32] http://www.sba.gov/content/score
[33] http://www.e3.gov/

matriculate the facility to the E3 program for further development especially with respect to lean manufacturing best practices and energy efficiency and environmental improvements.

This program currently supports resilience to climate change among participating businesses and communities because of its focus on increased efficiency which can include both energy efficiency and water efficiency. Given the predicted impacts of climate change upon water availability, energy grids and energy supplies, the more efficient a manufacturer is, the more resilient they will be to these impacts. Moreover, the SBA recommends that the E3 program participants consider climate change adaptation more explicitly as a component of the assessments and technical assistance provided to participants in the future.

(2) Hurricane Sandy Small Business Disaster Relief: A Model for Future Disaster Recovery?

The Office of Entrepreneurial Development supported the Sandy Recovery and Disaster Readiness effort with a two-phased approach: Phase 1 was a short-term initiative for immediate needs and to primarily to help with recovery. It sent funds out to SBA partners to ramp up existing counseling and training services. Phase 2 is focusing on long-term resiliency efforts through collaboration among our resource partners to improve efficiency and avoid duplication of efforts. The two phased approach supports jumpstarting the recovery process as well as investing in the rebuilding of the small business economic ecosystem while building enhanced resiliency strategies into existing businesses. Both phases were realized through two rounds of grant opportunities issued and managed by OED. The total funding opportunity for resource partners in Phase 1 was $5,811,000 and the total in Phase 2 was $13,189,000. These amounts total $19,000,000 which includes the impact of sequestration.

The goal of using the collaborative approach is to improve efficiency of business assistance delivery, to foster community-based formulation and coordination of services and to avoid duplication of efforts. Because of the ability of climate change to influence severe weather events, the development of this type of innovative approach to assist the small business community with disaster recovery, planning and future resilience can help communities be better prepared and able to adapt to climate change.

Following Hurricane Sandy, the Office of Entrepreneurial Development found that allowing Small Business Development Centers to assist out of state businesses during the disaster recovery period was important to meeting the needs of the impacted communities. Based on this experience and that from past disasters, the Office of Entrepreneurial Development is drafting language to amend the Small Business Act to allow Small Business Development Centers to assist out of state businesses in the aftermath of officially declared disasters, as defined under the Act.

(3) The Interagency Network of Enterprise Assistance Providers (INEAP)

The INEAP[34] was founded to support small and medium sized enterprises in the U.S. by establishing a network of federal business and technical assistance programs and nonprofit associations. Currently, the intent of the network is to learn more about other program's management and field operations, explore innovative service delivery opportunities, discuss the development of the information sharing networks, develop additional network synergistic skill capabilities and share proven best practices in policies and program impact assessments. The INEAP employs

[34] http://www.nist.gov/ineap/#

an informal, entrepreneurial approach to information sharing and finding ways to maximize government and private resources to better serve larger numbers of smaller enterprises to achieve greater economic impacts. In its short existence the INEAP has developed a reputation among Federal Agencies as a resource to leverage to reach smaller businesses and as a current resource of technical and business information.

One of the focus areas that INEAP members pursue is disaster preparedness assistance. In practice, this has led to meetings on the Business section of Ready.gov[35], the Extension Disaster Education Network[36] (a provider of disaster education resources delivered through the Land Grant University system) and a meeting on small business resiliency hosted by the National Association of Development Organizations[37]. Because of the influence of climate change upon severe weather events this type of cross-agency collaboration and idea sharing on disaster preparedness and recovery helps agencies avoid duplicative efforts, increases their ability to direct the public towards appropriate resources and fosters innovation.

iii. Programs in the Office of Capital Access: 504 Loans and Energy Security

The projected impacts of climate change will increase energy use in the summer and pose additional risks to a reliable energy supply. As a consequence, improving energy efficiency and energy security is critical to maintaining a resilient national economy. The SBA's 504 Loan Program provides financing for major fixed assets, such as equipment or real estate, and it includes components that promote energy efficiency and renewable energy production. The Energy Independence and Security Act of 2007 (the "EISA") amended SBA's 504 loan program by adding incentives promoting energy efficiency and renewable energy production. The stated goal of the EISA is to move the United States toward a

[35] http://www.ready.gov/business
[36] http://eden.lsu.edu/AboutEDEN/HowEDENWorks/Pages/default.aspx
[37] http://www.nado.org/category/resources/disaster-recovery/

greater energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of projects, buildings, and vehicles, to promote research on and deploy greenhouse gas capture and storage options, and to improve the energy performance of the Federal Government, and for other purposes.

Specifically, the EISA amended SBA's 504 loan program to allow for larger loan maximums per project for projects that reduce a borrower's energy consumption by at least 10 percent and for projects that generate renewable energy or renewable fuels, such as biodiesel or ethanol production. By providing incentives for increases energy efficiency and renewable energy production this program supports greater energy security in the U.S. in the face of climate change.

b. Barriers to National Resilience to Climate Change and Perverse Incentives that Increase Pubic Vulnerability to Climate Change Risks

During the cross-agency and one-on-one meetings with program offices that were used to create the contents of this plan both barriers to resilience and perverse incentives were discussed. During these discussions no program offices were able to clearly identify barriers to resilience or perverse incentives. Some consideration was given to ODA's disaster loan programs, but upon an examination of the loan program requirements no clear barriers or perverse incentives were found because of the flexibilities built into the programs. These flexibilities include the ability of businesses and homeowners to relocate under certain circumstances and the ability of businesses and homeowners to use loan proceeds on mitigation measures. To ensure that barriers to resilience and perverse incentives were not overlooked or that new ones do not develop, the SBA will continue to monitor its programs in the future for both of these challenges.

IV. Conclusion

The SBA's climate change adaptation efforts are focused on three things: ensuring the SBA can continue to operate effectively in the face of climate change; helping small businesses prepare for the impacts of climate change; and providing support to communities impacted by natural disasters. The FY 2014 Climate Change Adaptation Plan establishes a strong risk management framework for assessing and managing risks to the agency and outlines how a variety of existing SBA programs contribute to adaptation efforts across the nation. The SBA is prepared to continue assessing its operations and programs in the future to continue identifying new risks, to determine whether any of the agencies programs create barrier to adaptation, and to identify opportunities to support climate change adaptation among the small business community. The SBA looks forward to continuing collaboration with other agencies to achieve these and other goals in the future.

Appendix B

Survey on Agency Climate Adaptation Plans

AGENCY: SBA

POINT OF CONTACT (Addison Huber, 202-205-6635, ahuber@sba.gov)**:**

Element	#	Questions: Has your agency…	Yes/No/ Partial	Plan Page Reference
Risks and Vulnerabilities	Q1	Comprehensively assessed and reexamined, as appropriate, the climate change-related impacts on and risks to the agency's ability to accomplish its missions, operations, and programs?	Yes	11
Mission and External Programs	Q1	Identified opportunities to support or encourage smarter, more climate-resilient investment through grants, loans or other financial incentives?	Yes	5
	Q2	Identified opportunities to support or encourage smarter, more climate-resilient investment through program planning requirements?	Yes	21
	Q3	Identified barriers, prioritized and established timelines for implementing those opportunities?	Yes	34
Agency Internal Policies	Q1	Identified the internal agency policies that require updating to manage climate risks and build resilience in the short and long term?	Yes	4
	Q2	Identified the component/office responsible for updating those policies, the level of maturity of the effort (e.g., "initiated" or "ongoing"), and key milestones or timelines for implementation?	Partial	36
	Q3	Successfully revised policies?	Yes	Mult.
Agency Facilities and Infrastructure	Q1	Identified which facilities and infrastructure may be impacted by climate change?	Yes	9, 12
	Q2	Identified the components/offices responsible for addressing those risks, developed a strategy for addressing facilities and infrastructure that are at-risk, and identified barriers and timelines for implementation?	Yes	13
Data, Information and Tools	Q1	[For Agencies that Develop Climate-Related Data] Established clear goals and timelines to develop and share the latest data, information and tools across Federal agencies at the national, regional, and local levels?	N/A	N/A
	Q2	Establish clear goals and timelines to integrate the latest data, information and tools into Federal programs, policies, and operations?	Yes	3
Climate Literacy, Training and Technical Assistance	Q1	Conducted an assessment of climate literacy, training and technical assistance needs of agency staff and key mission-critical external partners?	No	
	Q2	Established clear goals and timelines for implementing climate literacy, training and technical assistance programs for key partners (internal and external)?	Partial	28
Supply Chain	Q1	Identified climate change-related risks to critical supply chains?	Yes	20
	Q2	Identified and implemented actions to manage supply chain risks?	Yes	20

Agency Narrative Response Template

Element:	Agency Internal Policies
Question(s) under this Element that are not or only partially addressed:	☐ Q1 ☒ Q2 ☐ Q3
Action or Target Outcome:	
SBA fully considers the impacts of climate change when it conducts annual updates of its Continuity of Operations Plan and Disaster Preparedness and Recovery Plan. Climate change has been one of the elements considered as SBA has developed its Enterprise Risk Management program over the past couple of years. To date, the Enterprise Risk Board has not added a climate risk as part of its draft risk registry. As this registry evolves into mature risk profile, in accordance with OMB guidance, SBA will continue to consider climate change as a potential source of risk for the agency. Accomplishment here is considered "partial" because Enterprise Risk Management is still under development (and will be throughout FY2017).	
Level of Maturity/Status:	**Ongoing/In Progress**
Major Milestones and Timeline:	
SBA will adhere to the risk management timeline in OMB Circular A-123 when that guidance is published.	
Responsible Component/Office/Individual:	
Director, ODP/RM	
Challenges or Barriers to Implementation:	
None	

Element:	Climate Literacy, Training and Technical Assistance	
Question(s) under this Element that are not or only partially addressed:		☒ Q1 ☒ Q2 ☐ Q3

Action or Target Outcome:

SBA maintains a co-sponsorship with the private corporation Agility Recovery to maintain an educational website focused on business continuity planning and disaster recovery resources called PrepareMyBusiness.org. This website continues to evolve to provide the latest information to small businesses to enhance their understanding of climate change, its impacts, and, most importantly, means to offset the risks from climate change.

The 2016 National Preparedness Report identifies Economic Recovery, of which small business resilience is a component, a continued area for improvement. SBA is exploring means to expand its message that small businesses can adopt simple, inexpensive tools that can greatly enhance their resilience and, therefore, reduce the need to "recover" after a disaster. SBA's efforts will be catalogued in an overall interagency approach to be published by the National Security Council in September 2016.

Level of Maturity/Status:	Choose an item.

Major Milestones and Timeline:

None.

Responsible Component/Office/Individual:

Assoc Admin, Disaster Assistance for PrepareMyBusiness.org; Director, ODP/RM for resilience tools

Challenges or Barriers to Implementation:

None.

Appendix C

VAM/FAST Inventory Year-to-Year Comparison

Small Business Administration

This report compares the most recent VAM Summary provided by your agency against the actual inventory (for years available) and planned inventory numbers reported by your agency during the annual FAST data call. It is expected that these two data sets will follow each other over the life of the VAM as your agency works toward an optimal fleet. Significant differences between the two (greater than 20%) will be highlighted in yellow and should be addressed in your Fleet Management Plan and Budget Summary document to be submitted to GSA/OMB each year.

	VAM Summary						FAST Data Summary					
	Sedan	**Other**	**Truck**	**Other**	**Total**	**%**	**Sedan**	**Other**	**Truck**	**Other**	**Total**	**%**
	VAM 2011 Baseline Fleet						2011 Actual Inventory					
Conventional Fuel Vehicles	42	22	0	0	64	38%	81	135	1	0	217	36%
Alternative Fuel Vehicles	66	36	4	0	106	62%	106	281	0	0	387	64%
Exempted Vehicles	0	0	0	0	0							
Total	108	58	4	0	170		187	416	1	0	604	
% Mix	64%	34%	2%	0%			31%	69%	0%	0%		
	VAM 2012 Plan						2012 Actual Inventory					
Conventional Fuel Vehicles	42	21	0	0	63	35%	55	28	3	0	86	52%
Alternative Fuel Vehicles	78	34	6	0	118	65%	53	26	0	0	79	48%
Total	120	55	6	0	181		108	54	3	0	165	
% Mix	66%	30%	3%	0%			65%	33%	2%	0%		
	VAM 2013 Plan						2013 Actual Inventory					
Conventional Fuel Vehicles	42	19	1	0	62	34%	31	17	1	0	49	32%
Alternative Fuel Vehicles	78	36	7	0	121	66%	60	44	2	0	106	68%
Total	120	55	8	0	183		91	61	3	0	155	
% Mix	66%	30%	4%	0%			59%	39%	2%	0%		
	VAM 2014 Plan						2014 Actual Inventory					
Conventional Fuel Vehicles	27	18	1	0	46	30%	36	16	1	0	53	34%
Alternative Fuel	66	35	7	0	108	70%	54	47	2	0	103	66

	VAM Summary						FAST Data Summary					
	Sedan	**Other**	**Truck**	**Other**	**Total**	**%**	**Sedan**	**Other**	**Truck**	**Other**	**Total**	**%**
Vehicles												%
Total	93	53	8	0	154		90	63	3	0	156	
% Mix	60%	34%	5%	0%			58%	40%	2%	0%		
					VAM 2015 Plan						2015 Actual Inventory	
Conventional Fuel Vehicles	27	18	1	0	46	30%	32	21	1	0	54	34%
Alternative Fuel Vehicles	66	35	7	0	108	70%	58	46	2	0	106	66%
Total	93	53	8	0	154		90	67	3	0	160	
% Mix	60%	34%	5%	0%			56%	42%	2%	0%		
					VAM Optimal Fleet						2015 Actual Inventory	
Conventional Fuel Vehicles	42	22	0	0	64	38%	32	21	1	0	54	34%
Alternative Fuel Vehicles	66	36	4	0	106	62%	58	46	2	0	106	66%
Total	108	58	4	0	170		90	67	3	0	160	
% Mix	64%	34%	2%	0%			56%	42%	2%	0%		

2016 Fleet Management Plan

A. Introduction to the Agency and the Role of the Fleet in Completing the Agency Mission

The U.S. Small Business Administration (SBA) was created in 1953 as an independent agency of the federal government to aid, counsel, assist and protect the interests of small business concerns, to preserve free competitive enterprise and to maintain and strengthen the overall economy of our nation. The SBA helps Americans start, build and grow businesses. Through an extensive network of field offices and partnerships with public and private organizations, SBA delivers its services to people throughout the United States, Puerto Rico, the U. S. Virgin Islands and Guam. SBA's primary program functions include: access to capital, entrepreneurial development, government contracting, advocacy, and disaster assistance. These programs receive a variety of administrative support services including facilities management, IT support, financial management, procurement management and human resources support. For a small agency, SBA is very geographically dispersed. SBA has district offices in all 50 states, the District of Columbia, Guam and Puerto Rico. In some larger states, SBA has multiple district offices and SBA also has regional offices located throughout the country. In addition, SBA's Office of Disaster Assistance and Office of Capital Access have several large loan servicing centers located throughout the country. In fulfillment of the Inspector General Act, the Small Business Administration (SBA) has an Office of Inspector General (OIG) which provides auditing, investigative, and other services to support and assist the SBA in achieving its statutory mission.

SBA's vehicle fleet supports the agency's mission by allowing SBA's workforce to conduct outreach in the communities where America's small business owners and entrepreneurs are located. The vast majority of SBA's vehicle fleet is associated with SBA's dispersed field offices. These vehicles increase the mobility of field office staff so that they can reach out to a variety of businesses, collaborate with SBA's resource partner network, and communicate with the many financial institutions that offer SBA loans. This is particularly important in large states with low population density, such as Montana, or in car oriented urban areas with high demand for SBA's services, such as Los Angeles. SBA balances its use of vehicles to ensure that it is optimally configured and provides vehicles where they are most needed. As such, some field offices, such as the Illinois District Office, don't have vehicles. SBA's OIG also utilizes vehicles throughout the country to conduct their statutorily mandated investigative activities. SBA's executive fleet consists of two vehicles that are located at SBA Headquarters in Washington, DC.

B. Criteria for Assigning and Justifying Vehicles

The factors used by SBA to determine whether the acquisition of a vehicle will be approved include: the mission of the requesting office; the number of employees in the requesting office, the statement of need from the requesting office; whether the office already has other vehicle(s) assigned to it; historical usage; and the geographic, population and transportation characteristics of the area served by the office. SBA's Standard Operating Procedure (SOP) on the Personal Property Management Program covers the SBA Fleet

Management Program, and requires that all requests for vehicles be made in writing to staff in the Office of Administrative Services. Each request is subject to approval by the Director of the Office of Administrative Services.

All vehicles are assigned to offices, rather than individuals or job classifications. The only exception to this rule is for the executive fleet (2 vehicles) assigned to SBA's Administrator and Deputy Administrator.

SBA's SOP on the Personal Property Management Program contains specific requirements and criteria for home-to-work transportation. All home-to-work requests must be submitted by a Management Board member or District Director and they may only be approved by high level staff members from a specific list of Associate Administrators and Office Directors. SBA rarely grants these requests.

C. Explanation of Fleet Size, Fleet Cost Changes and their Relation to VAM Projections

According to the VAM, SBA's optimal fleet is 170 vehicles. SBA's current fleet consists of 156 vehicles which is well below the ceiling created by the VAM. In FY 2013 and FY 2014, SBA conducted a right-sizing exercise for its fleet vehicles assigned to the Office of Field Operations that resulted in this lower total. In March of 2014 SBA had 106 AFVs (96 gas/ethanol vehicles and 10 hybrid vehicles) which comprised 69% of its fleet. As of March 2016, SBA has 120 AFVs (98 gas/ethanol vehicles, 9 hybrid electric vehicles and 14 low greenhouse gas vehicles) which make up 74% of the agency's fleet. SBA has been able to make this progress by replacing gasoline vehicles with low greenhouse gas vehicles that are more widely available than gas/ethanol vehicles and hybrids.

Fig. 1 Change in Total Number of Vehicles

Year	Total Number of Vehicles
2011 Baseline	170
2016	160

D. Description of Efforts to Control Fleet Size and Cost

In early 2013, SBA conducted a fleet right-sizing effort in its Office of Field Operations that resulted in the elimination of 15 vehicles based on utilization, cost and the mission of the impacted office. SBA also eliminated one vehicle from its Headquarters facility. In the future, SBA plans to continue assessing its fleet for additional opportunities to decrease the size of vehicles, replace non-AFV vehicles with AFV vehicles and eliminate cars that are underutilized. SBA's FY 2016 fleet budget is $844,687 and the agency anticipates it will remain stable in FY 2017. The FY 2015 budget is approximately $150,000 above the reported FY 2014 budget because in FY 2014 did not include the fleet budget for the agency's office of the Inspector General. In future years the SBA will include the budget for the Inspector General in its budgetary reports.

E. Explanation of How Law Enforcement Vehicles are Categorized

SBA does not have any vehicles categorized as law enforcement vehicles.

F. Justification of Restricted Vehicles

As of March 2016, 59% of SBA's fleet is composed of midsize or compact cars, 40% is composed of Light Duty vehicles, and the SBA leases only 1 Mid Duty SUV and 1 Mid Duty van. According to SBA's SOP for the Personal Property Management Program, any requests for vehicles larger than Class III midsize vehicles must be submitted in writing to the Director of the Office of Administrative Services. Appropriate justifications for larger vehicles include frequent needs to bring a large number of staff members to outreach events, the number of employees in the office, and the need to transport large display items. SBA intends to reduce the number of large vehicles in its fleet inventory in the future.

SBA has posted its executive fleet on its public website at the following link: https://www.sba.gov/sites/default/files/files/federal_fleet_performance_reporting.pdf. SBA does not have any limousines in its inventory.

G. Description of Vehicle Replacement Strategy and Results

SBA has already exceeded its optimal fleet inventory goal, in terms of the total number of vehicles, by maintaining only 156 vehicles in the agency fleet in comparison with the goal of 170. SBA intends to meet the requirement to acquire only AFV vehicles by the end of 2016 and SBA currently ensures any non-AFVs that are replacement eligible are replaced with AFVs.

SBA frequently requests AFVs that do not require special fuel, such as hybrids; however, GSA often does not have these vehicles in stock. In response to this challenge and the lack of availability of Flex Fuel stations, SBA has begun to acquire low greenhouse gas vehicles as a means of ensuring the agency will meet its AFV goals.

SBA only obtains its vehicles through leases with GSA. SBA relies on GSA because its leasing system is consistent throughout the U.S. and its tools for managing vehicle inventories are very useful to SBA. By relying on GSA, SBA does not have to incur as many administrative costs in managing its fleet as it would if it used non-government sources.

H. Description of the agency-wide Vehicle Management Information System

SBA uses GSA's fleet management tools, including Drive Thru, FAST and the VAM as its Vehicle Management Information System. Because all of SBA's vehicles are leased through GSA, Drive Thru is an excellent tool for tracking SBA's inventory and usage data. Drive Thru data can also be easily integrated into FAST, the VAM, and the sustainability reporting tools such as the Greenhouse Gas Inventory and Strategic Sustainability Performance Plan.

I. Plans to Increase the Use of Vehicle Sharing

SBA Headquarters has expressed interest to GSA in participating in a federal government car sharing pilot. In addition, the Office of Field Operations is currently exploring the possibility of using car sharing at some of its facilities.

J. Impediments to Optimal Fleet Management

One of the challenges facing SBA relates to AFV vehicles. The lack of readily available hybrid and other AFVs in GSA's vehicle inventory that do not depend on special fuels, as well as the higher cost of these vehicles in comparison to others, makes it difficult for SBA to acquire AFVs that are practical for the area in which they are located. The lack of fueling stations for the vehicles that need special fuels to achieve their maximum efficiency compounds this challenge.

K. Data Anomalies and Possible Errors

Beginning in FY 2013, SBA greatly improved the quality of its fleet data and has maintained high standards since this time.

L. Summary

SBA has accomplished several important goals related to its fleet in FY 2016. SBA exceeded its goal for its optimum fleet size by reducing its fleet of 156 vehicles which is below its optimum fleet size of 170 vehicles. In addition, AFV vehicles represent 74% of the agency's total fleet as of May 2016. These efforts demonstrate SBA's commitment to meeting the goals of the Presidential Memorandum on Federal Fleet Performance as well as the fleet sustainability goals outlined in E.O. 13514. SBA plans to continue building on this progress in the future by increasing its numbers of AFVs, and continually examining the usage of its current vehicles to identify opportunities for vehicle eliminations. These efforts will result in additional cost savings and improved environmental outcomes, in addition to the progress SBA has made to date.

M. Contact Information.

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- Fleet Manager: Andrea Levenberry, andrea.levenberry@sba.gov, 202-205-7040.

- Office of the Chief Financial Officer: Matthew Pascarella, matthew.pascarella@sba.gov, 202-205-6102.

Appendix D

SBA does not currently have a Multi-Modal Access Plan