

Comments on Adaptation and Resilience Chapter 21

Overview

The overview of the section should include a statement about centering justice and equity in climate adaptation and resilience planning. Although these points are raised throughout the draft plan and are within the recommended strategies for resilience, not addressing them in the overview makes equity and justice seem like an afterthought. (p. 308)

[Several cities](#) are making climate justice central to their climate action planning, this includes Boston, Los Angeles, and Oakland. The trend of treating climate justice as an add-on is prevalent across [climate action plans](#). Specific cities are not provided, but among the top 100 cities in the US, only 20 cities had explicitly included climate justice in their plan.

- AR.1 Develop an adaptation and resilience plan (p. 311): It is unclear if or how this plan would complement the mitigation plan. It can be more effective and efficient to consider the synergy between adaptation and mitigation. For example, a snug building is more resilient in the face of extreme temperatures. The resilience of the electric grid affects the health of climate-impacted citizens who depend on AC in heat waves, oxygen for asthma etc.
- AR.2 Incorporate Equitable Adaptation and Risk-Reduction Considerations into Relevant State Funding and Regulatory Programs, Projects, and Policies (p. 312): Given the extensive work done in this field what specific framework or frameworks that will be guiding this process?
- Cutter et al. (2014) developed a baseline of resilience indicators for communities (BRIC) that could be applied across counties in the US and six sectors. Cutter et al. (2014) applied the BRIC to the context of disaster resilience and [FEMA](#) reviewed resilience indicators commonly used in peer-reviewed literature.
- AR.2 Assess climate vulnerabilities during land and water planning (p. 312): Will climate vulnerabilities be coupled with social, economic, and health vulnerabilities? For example, considering how indicators of the social vulnerability index overlap with climate vulnerabilities across NYS.
- AR.3 Strengthen Meaningful Community Engagement and Public Education and Build Adaptive Capacity across all Sectors: Raise student and public awareness (p. 313) How does this connect with existing curricula? What type of campaign? We recommend building out a thoughtful plan that has a well-resourced budget to authentically engage community members in changing lifestyle paradigms.
- AR.3 Provide disaster preparedness and response training for building operations staff (p. 313): Will this process be incentivized? What will motivate or drive staff to complete this training?

- AR.4 Identify and Evaluate Options for Supporting Equitable Adaptation and Resilience Practices and Projects, and to Enhance Insurance Protection: Explore hazard mitigation funding alternatives (p. 314): How will the proposed process impact vulnerable populations? The suggested process sounds as though the consumers will incur additional costs.
- AR.5 Provide State Agency Planning and Technical Support for Equitable Regional and Local Adaptation and Resilience Plans and Projects. Deploy online tools (p. 315): There are already a great number of such tools available - will there be standardization across which tools are recommended? And many of the tools are difficult to navigate, will there be support and education to accompany this? For example, the numerous tools available in the Climate Resilience [toolkit](#).
- AR.6 Evaluate Opportunities to Ensure Equitable Consideration of Future Climate Conditions in Land-Use Planning and Environmental Reviews Excerpt Chapter 21 and Appendix H: Adaptation and Resilience Strategy Components (page 11):
- DEC should accelerate ongoing efforts to develop or update guidance for mitigation of climate change risks in permit and SEQRA reviews; and amend the SEQRA Handbook and workbooks. DEC should accelerate ongoing efforts to incorporate consideration and mitigation of climate change risks in permit and SEQRA reviews and complete revisions to all relevant permit guidance, workbooks and the SEQRA Handbook.
- [ICLEI](#) (International Council for Local Environmental Initiatives) and [CDP](#) (Carbon Disclosure Project) both provide tools that could easily be implemented in this update to address concerns on mitigation and adaptation for SEQRA.
- AR.10 Develop Policies and Programs to Reduce Risks Threatening Ecosystems and Biodiversity. Amend Real Property Tax Law to incentivize private forest stewardship (p. 319): With a lack of professional foresters to assist in this process of understanding the tax law, the incentives, and Best Management Practices (BMP) for private-owned forests, could these funds be used to also help increase the Master Forest Owner Volunteer program? Also, amend Real Property Tax Law to incentivize regenerative ag practices.
- AR.12 Enhance Climate Resilience and Adaptive Capacity of Agricultural Sector, while Preparing to Take Advantage of Emerging Opportunities (p. 320): Components of the strategy do not discuss management of agricultural runoff. Runoff should be considered in adaptation strategies in the context of managing floods. Flooding, runoff, HABs in lakes are interconnected. Include consideration of other extreme weather impacts such as droughts. Consider next-gen farmers and understand emerging opportunities including ancient grains or the [Jubilee Justice](#) Black Farmer's Rice Program.