March 31, 2021

Ms. Doreen Harris
Acting President and CEO
New York State Energy Research and Development Authority
Co-Chair Climate Action Council

Mr. Basil Seggos
Commissioner
NYS Department of Environmental Conservation
Co-Chair Climate Action Council

Dear Co-Chairs Harris and Seggos:

As President of the American Planning Association’s (APA) New York Upstate Chapter, I thank you for your vision and bold leadership on programs and policies important to our members to address the myriad issues related to climate change. Our organization is devoted to improving the nation’s communities and serving the public interest through good planning. We look forward to working with you to advance policy strategies to mitigate and adapt to the impacts of climate change.

Planning plays a significant role in responding to climate change mitigation and adaptation. Two of the largest contributors of greenhouse gases — transportation and buildings — are influenced by planning decisions and policies. Successfully tackling climate change requires the right funding and policies, and protecting the most vulnerable communities through just environmental policies. Meeting these challenges is an opportunity to create new jobs and advance long-term innovation and sustainability. The right approach to climate change and hazard mitigation will reduce costs, save lives, and create jobs.

Among the challenges that our communities face is capacity to address these pressing concerns. As we face down the challenges of climate change, many of us do so while still managing to do more with less. There have been numerous regional or state-wide planning initiatives examining the issues of resiliency and climate change however those statements of policy, while sound, lacked adequate mechanisms and financial resources for implementation at the local level. What’s more, the fragmented nature of programs and funding across agencies that can support local action are not as flexible to enable a full cross-cutting integration into local land use planning and decision-making.

Today, in many cases, we already know successful strategies but there is severely limited capacity to implement those strategies and incorporate them in local comprehensive planning, zoning laws, subdivision regulations and building codes. In response, the Upstate APA supports a “carrot and stick” approach which not only provides robust financial incentives for local implementation of policies to combat the impacts of climate change
and reduce carbon emissions, but also direct technical assistance to enhance capacity of local governments to implement state and regional policies locally.

The “carrot and stick” approach helps to reconcile the home rule nature of our local governments with the scale of regional, state-wide and global coordination and action that’s needed to mitigate and address the impacts of climate change. It is worth noting, however that state-wide planning and goal setting and real requirements for local comprehensive planning would also be helpful. New York State is the only state with state-level environmental review without commensurate requirements and standards for local planning. If climate change considerations are to be more specifically addressed in SEQRA, APA would welcome the opportunity to provide expert advice on those updates.

Other key strategies supported by Upstate APA include:

**Make climate change an integral part of transportation and infrastructure planning**
Climate measurement and performance should be incorporated into transportation planning and should drive investments. Regional planning agencies and state/federal agencies can ensure climate and clean energy targets are met. New funding should be provided for climate planning, resiliency, and investments that reduce emissions.

**Advance state and local resiliency plans and projects**
State programs can have a powerful impact on protecting vulnerable people and places. New York State should fully fund resiliency and mitigation programs. Infrastructure resiliency standards should be established and support provided for the data tools needed for effective climate planning.

**Support planning for emerging clean technologies and green infrastructure.** The emergence of electric vehicles (EVs) and other clean energy technology demands planning for new infrastructure. Federal policy should fund planning and implementation needs for EVs and other new mobility options. Green infrastructure investments provide multiple benefits for climate, resilience, and communities.

APA members are planners, elected and appointed local planning officials, educators, students, and engaged citizens who are committed to creating strong and vital communities. In all, APA is comprised of more than 40,000 members from across the United States. In New York State our chapter is 771 members strong. We are a diverse organization with members serving communities of all sizes and focused on a wide range of issues from housing to transportation to water infrastructure to parks, but we aspire to a common goal of creating open and vibrant communities of lasting value.

Thank you again for your leadership as we work together to minimize and address the impacts of climate change.

Sincerely,

Mark A. Castiglione, AICP
President
NY Upstate Chapter
American Planning Association