

Chairwoman Brenda Mallory
White House Council on Environmental Quality
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American Society of Adaptation Professionals (ASAP) and Resilience21 (R21) thank the White House Council on Environmental Quality (CEQ) for the opportunity to provide comments on the Federal Agency Adaptation Plans. Our recommendations for maximizing the impact of agency adaptation plans are:

1. Set up transparent, federal government-wide mechanisms to monitor, evaluate, and communicate progress on plan implementation.
2. Increase CEQ's internal capacity to coordinate and lead federal action on climate adaptation.
3. Increase the capacity of individual agencies to implement their plans through equitable and effective adaptation action.
4. Continue to encourage systems thinking in agency adaptation planning and implementation.

ASAP and R21, along with our individual members, are pleased to serve as a resource to CEQ as it leads the federal government's effort to prepare for the impacts of climate change. Please direct responses and inquiries to Beth Gibbons, Executive Director, American Society of Adaptation Professionals at bgibbons@adaptpros.org or (734) 219-3529.

Introduction to American Society of Adaptation Professionals (ASAP) and Resilience21 (R21)

ASAP supports and connects climate adaptation professionals to advance innovation in the field of practice. With over 700 individual adaptation professionals - and 42 organizational members collectively employing over 100,000 people - ASAP's members offer expertise covering all facets of the rapidly evolving field of climate change adaptation and climate resilience. Adaptation professionals across the U.S., including inside the federal government, rely on ASAP's network, resources, and trainings to ensure their work meets the highest professional and ethical standards ([articulated in ASAP's Code of Ethics](#)) and principles for equitable and effective adaptation practice ([articulated in ASAP's Living Guide to the Principles of Climate Change Adaptation](#).) Further, ASAP members represent a wide range of individuals and organizations that may be affected by agency adaptation plans, including climate service providers, federal funding recipients, and federal agency employees.

[Resilience21](#) is a volunteer group of resilience practitioners in diverse communities from across the United States and Affiliated Nations, providing guidance and insight from their collective experience in the field, building and promoting resilience across the nation and around the world.

Recommendation 1: Set up transparent, federal government-wide mechanisms to monitor, evaluate, and communicate progress on plan implementation.

ASAP and R21 appreciate the Biden Administration's recognition of the importance of adaptation planning and applauds the release of the agency adaptation plans as an important first step in preparing the federal government for the impacts of climate change. We anticipate that CEQ's next step will be to introduce oversight and enforcement mechanisms to ensure that individual agencies carry out their plans. We also expect that CEQ will create mechanisms to transparently communicate progress to the public by establishing protocols for regular reporting.¹ ASAP and R21 implore CEQ to set up federal government-wide monitoring and evaluation mechanisms, as opposed to on an agency-by-agency basis. In order to set up those mechanisms, CEQ will need to establish shared language and identify outcomes and metrics that can be used across all of the agency adaptation plans. This is a challenging proposition, but one which ASAP, R21, and our members are well-positioned to support. Additionally, CEQ should establish and oversee a schedule for updating the plans on a regular basis.

Recommendation 2: Increase CEQ's internal capacity to coordinate and lead federal action on climate adaptation.

To successfully identify shared language, outcomes, and metrics across the plans, CEQ must bolster its internal capacity to coordinate and lead federal climate adaptation action. This includes designating a single point of contact in the White House to whom agencies answer regarding adaptation and resilience matters and hiring on additional adaptation and resilience expertise to CEQ. This may also include establishing and leading a body with representatives from each agency. These actions will create the conditions necessary to establish a federal government-wide vision and coordinated approach to adaptation, which can then translate to consensus priorities for the administration for adaptation and resilience. From there, CEQ can identify a single - or at least coordinated - set of outcomes and metrics that can be used to track progress across the agency adaptation plan and across the federal government as a whole.

Recommendation 3: Increase the capacity of individual agencies to implement their plans through equitable and effective adaptation action.

Publishing 24 agency adaptation plans is a significant achievement; implementing those plans is what will lead to actual progress on federal climate preparedness. Most of the agency adaptation plans articulate the need for increased capacity to implement the actions described in the plan, including funding and staff training. CEQ should improve agencies' capacity to implement their plans by advocating for adequate appropriations for existing and new programs. Additionally, CEQ should establish expectations for agency staff knowledge and competency in adaptation and resilience and should support agencies in accessing mission-relevant adaptation and resilience training for their staff. ASAP can support this through application of its [Knowledge and Competencies Framework for Climate Change Adaptation and Climate Resilience Professionals](#) and existing training resources. Finally, CEQ must safeguard justice and equity as agencies implement their plans. ASAP and R21 support Justice40 *as a minimum standard* for correcting historic disinvestment in communities at the

¹ Examples of such mechanisms include a government-wide dashboard and/or annual reports with regular and known update timeframes.

forefront of climate change². CEQ must acknowledge that [many communities will need additional financial \(up to full funding\) and technical support to address their climate risks](#). Further, in order to achieve even Justice40, CEQ will need to look beyond existing mechanisms for distributing climate adaptation funding, as many of those mechanisms are currently neither effective nor equitable.

Recommendation 4: Continue to encourage systems-level thinking in agency adaptation planning and implementation.

Finally, CEQ should hold up examples of systems thinking in specific agency plans as a standard on which to build future actions. These include agencies that:

- recognize the interdependence of climate change adaptation and greenhouse gas emission reductions;
- holistically respond to how adaptation and resilience intersects with their mission and integrating adaptation and resilience needs and opportunities into all aspects of agency function, from physical assets to grant programs;
- position the agency's work on adaptation to create just and equitable outcomes for individuals and communities at the forefront of adaptation;
- and recognize the need to plan for both adapting in place and moving out of harm's way, depending on projected future conditions in the place in question.

In addition to being a prerequisite for effective and equitable adaptation, systems thinking encourages agencies to operate with an awareness of their existence in the fabric of surrounding communities, ecosystems, and economies, as well as the whole of the federal government. This allows them to take advantage of opportunities to extend the benefits of agency actions beyond agency assets³ and avoid actions that may contribute to maladaptation in the surrounding community.⁴ A Federal Advisory Committee of diverse stakeholders from across the nation would be an effective mechanism for supporting CEQ and agencies in maintaining a systems-level approach to ongoing adaptation efforts.

In conclusion, ASAP, R21, and its members are grateful for the release of the agency adaptation plans and look forward to working with CEQ to maximize their impact.

² People and communities at the forefront of climate change are those that experience the consequences of climate change first and worst and are therefore already adapting to it. They include people who are both highly exposed to climate risks because of the places they live and have fewer resources, capacity, safety nets, or political power to respond to those risks because of widespread discrimination, promoted by histories of colonialism, white supremacy, domination of nature, and economic exploitation. They include Black people, Indigenous Peoples, people of color, people with low incomes and from low income backgrounds as well as other individuals and communities such as immigrants, those at-risk of displacement, old and young people, people experiencing homelessness, outdoor workers, incarcerated people, renters, people with disabilities, and chronically ill or hospitalized people.

³ For example, if the postal service conducts vulnerability assessments on their routes, this translates into assessments for the majority of the U.S. and removes the burden for small communities to conduct their own assessments if it is shared effectively.

⁴ For example, constructing a seawall that provides narrow protection to a federal building but increases risks to adjacent buildings.