Recommendations to Protect Urban Vulnerable Populations in New York State from Extreme Heat Events and Mitigate Health Risks
The Extreme Heat Coalition is a diverse group of environmental, housing, and social justice organizations that advocate for protections serving low-income urban communities of color across New York State disproportionately burdened by extreme heat. Our policy goals advance disaster and health equity. Our advocacy is rooted in on-the-ground experience in research, service, and community organizing in our respective fields. Members include: WE ACT for Environmental Justice, South Bronx Unite, Earthjustice, Natural Resources Defense Council, New York Disaster Interfaith Services, Central x South East Brooklyn CDC, Groundwork Hudson Valley, Association for Neighborhood & Housing Development, Natural Areas Conservancy, Climate Changemakers of Brooklyn, and Waterfront Alliance.
We mobilize to ensure urban, historically marginalized and vulnerable communities facing extreme heat are protected through policy, adaptation planning, and resilient infrastructure interventions that advance health equity. There is a direct throughline linking environmental racism to the heat health outcomes of urban communities of color and low income. Decades of policy decisions have culminated in:

- Black residents dying at twice the rate of their white counterparts from heat exacerbated illness;
- Black individuals in America are nearly 1.5 times more likely than other races and ethnicities to be diagnosed with asthma in their lifetime; and
- across more than 100 cities, a recent study found formerly redlined neighborhoods are today 5 to 12 degrees hotter in summer. Redlined neighborhoods, which remain lower-income and more likely to have Black or Latinx residents, consistently have far fewer trees and parks that help cool the air. They also have more paved surfaces, such as asphalt lots or nearby highways, that absorb and radiate heat.

By addressing the environmental and social barriers to cooling, we can snuff out the root causes of heat mortality.
INTRODUCTION

WE ACT for Environmental Justice launched the Extreme Heat Coalition in 2023 as an extension of the Heat, Health, and Equity Initiative, which aims to protect New York City’s vulnerable populations from Extreme Heat, the deadliest impact of climate change. This mission is especially urgent in the wake of last year going down in history as the hottest year on record, and a growing share of New Yorkers dying in temperatures below the heat advisory threshold due to longer periods of exposure without cooling devices in the home. The coalition is striving to:

- Support policy reform that addresses the City’s rising temperatures through equitable maintenance and expansion of green spaces
- Streamline access to energy efficiency and low emissions cooling technologies for low-income residents
- Strengthen the City’s emergency planning during extreme heat events
- Increase the utilization of and improve the services provided by New York City’s Cooling Center Program
- Increase communication with vulnerable populations to raise awareness about extreme heat and its health impacts
- Increase green design and renewable energy production to reduce strain on the energy grid while expanding access to cooling

The Extreme Heat Coalition has expanded our capacity to pursue these objectives, both in New York City and other urban areas across the state. It is essential that we move beyond poor distribution of green infrastructure, energy insecurity, and reactive heat emergency communications toward cooler urban environments, better resourced community members, and proactive climate harm reduction strategies.

Swift and robust government action is needed to proactively prepare urban communities across the state for rising temperatures and mitigate the corresponding health risks. There are opportunities that can be leveraged to have a tangible impact in addressing heat health inequities. The Clean Water, Clean Air, and Green Jobs Environmental Bond Act (henceforth referred to as the “Environmental Bond Act”) and the Inflation Reduction Act are unique opportunities to invest in climate resilience at the household and community level to combat extreme heat. New York City leadership should act swiftly to take advantage of this unprecedented abundance to cool the built environment in heat-vulnerable disadvantaged communities. As funding from the Environmental Bond Act and the Inflation Reduction Act is directed to new and existing programs, the application processes should center transparency and accessibility for organizations led by the needs and priorities of the most heat vulnerable residents.
New York City is particularly susceptible to rising temperatures because its physical design characteristics amplify the urban heat island effect. New York City’s struggle with inequality causes extreme heat events to disproportionately affect certain populations and neighborhoods (Table 1). For example, neighborhoods in East Harlem, Central Harlem, and the South Bronx have some of the highest scores on the heat vulnerability index, a measurement of risk to heat-related illness or death. Additionally, low-income and senior citizens are more susceptible to adverse health impacts related to extreme heat. Much of this inequity comes from structural and historical racism, forcing low-income and people of color in New York City to:

- Live in older, poorly maintained apartment buildings
- Live in crowded apartments with intergenerational living
- Live in neighborhoods with less green space
- Live in neighborhoods with more air pollution from buildings and industrial sites
- Stretch their resilience and their means across many hardships, such as food, rent, chronic illness, and immigration status.

Figure 1. In NYC, Black people die of heat-related illness at a disproportionately high rate. Because of this, neighborhoods with more Black residents are more greatly impacted by extreme heat. These disparities stem from structural racism, which includes neighborhood disinvestment, racist housing policies, fewer job opportunities and lower pay, and less access to high-quality education and health care.
Table 1. Heat-related health complications are exacerbated by other health conditions and socioeconomic indicators of vulnerability, including age, race, income, and employment. These characteristics can overlap to create cumulative impacts that compound health risks.

| HEALTH | • People with chronic illnesses, such as cardiovascular, renal, and respiratory diseases, are more susceptible to heat stress and health complications on hot days. |
| AGE | • Senior citizens are more prone to heat illness due to increased isolation and pre-existing health challenges.5 • Children with pre-existing health conditions, such as asthma, are also at-risk during heat events. Like seniors, children tend to spend more of their time indoors, which heightens their exposure to hot temperatures.6 |
| RACE | • People of color are more vulnerable to energy insecurity, especially Blacks. For example, in Washington Heights, energy-insecure households are predominantly Black/African American and Latinx.7 • Fifty percent of the heat-related deaths in New York City are Black people, despite comprising just 25 percent of the City’s population.8 |
| INCOME | • Low-income families are more likely to be burdened by home energy insecurity and unable to pay for cooling and health services.9 • People experiencing homelessness have increased exposure to hot temperatures, struggle to access health services, and are often stigmatized, making it difficult to gain admission to cooling centers.10 |
| EMPLOYMENT | • Certain jobs require work to be done in extreme temperature conditions that expose employees to environmental hazards and increase health risks.11 This is especially true for essential workers during the ongoing COVID-19 pandemic. |
| ACCESS | • WE ACT’s 2021 Cooling Center report found that at least 12 percent of Northern Manhattan Cooling Center locations lacked wheelchair accessible bathrooms. • Language accessibility in extreme heat advanced warning systems and Cooling Center wayfinding must be prioritized. |

Figure 2. The Heat Vulnerability Index (HVI) shows neighborhoods whose residents are more at risk for dying during and immediately following extreme heat. The darker the color of the neighborhood, the higher the heat vulnerability index score (key depicted in top left corner). Gray shapes on the map are unscored areas. It uses a statistical model to summarize the most important social and environmental factors that contribute to neighborhood heat risk. The factors included in the HVI are surface temperature, green space, access to home air conditioning, and the percentage of residents who are low-income or non-Latinx Black.12
RECOMMENDATIONS

OBJECTIVE 1

ADVOCATE FOR LEGISLATIVE ACTION IN THE CITY COUNCIL TO MITIGATE EXTREME HEAT IMPACTS.

Recommendation 1: Support legislation to codify cooling centers in New York City.

WE ACT is working with New York City Council to develop legislation which would require that the City:

- include City’s cooling center program in the City Charter;
- set a minimum number of centers based on where heat vulnerable populations reside;
- institute a process for engaging local communities through a public education campaign (that includes both digital and physical advertisements) to raise awareness about cooling infrastructure; require that New York City Department of Health and Mental Hygiene (DOHMH) conduct a survey of program utilization and report it annually to the Mayor and the Council; 15
- allocate a budget specifically for cooling centers through the New York City Emergency Management (NYCEM);
- require locations that receive funding to serve as a cooling center to be open for every heat advisory;
- require locations that receive funding to serve as a cooling center to put up appropriate signage and train staff in how to identify heat related illness;
- have designated cooling centers that have extended hours, including evenings and weekends when many are currently closed; and
- provide programming at cooling center locations to make them desirable places to visit.
Recommendation 2: Pass legislation to limit indoor temperatures.

New York City is now designated as a humid subtropical climate, with average temperatures averaging above 72 degrees Fahrenheit in the summers and above 27 degrees in the winters. Constant warm weather and high relative humidity will only become increasingly frequent. Because New York City’s built environment traps heat, high indoor temperatures present a considerable risk to New Yorkers since there is less temperature fluctuation from day to night within urban dwellings compared to their outdoor surroundings. Researchers have observed a strong association between high temperatures that are sustained overnight into the following morning and heat-related mortality. To help heat vulnerable New Yorkers acclimatize to such conditions, there must be policy interventions that protect their right to cooling. In the same way building codes recognize a right to heating and running water for all tenants, it should ensure that every resident is guaranteed the means to prevent their homes from reaching dangerously high temperatures. The New York City Office of Emergency Management will begin distributing thermometers to seniors this summer in order to help vulnerable adults better recognize when heat exposure indoors presents a danger. This critical step must be followed by legislation that affirms cooling as a basic safety feature in the home. PlaNYC outlines a need for such a policy, and this must happen quickly.

Recommendation 3: City leadership must be accountable to survey and support the expansion of urban canopy and green in infrastructure heat vulnerable communities.

The New York City Council must introduce bills that promote research, design, and implementation of more solar on rooftops. A study conducted by researchers at UC San Diego Jacobs School of Engineering concluded that solar panels could reduce the amount of heat reaching roofs by up to 38 percent.
Likewise, Stuart Gaffin, a climatologist at Columbia University’s Center for Climate Systems Research, demonstrated that green roofs can cool near-surface air temperatures by an average of 16.4 ºC per unit area. Thus, increasing solar serves as both an adaptation and mitigation strategy by reducing heat absorption and greenhouse gas emissions.18

While tree planting initiatives carried forward by the Bloomberg and de Blasio administrations substantially increased tree cover in New York City, low-income neighborhoods of color still have inequitable access to the environmental services trees offer. For example, much of the cooling benefit of trees can be felt on park land. In New York City, predominantly Black neighborhoods contain roughly a quarter of the park acreage when compared to white neighborhoods.21 New York City’s Office of Management and Budget recently announced a new Climate Budget Process in which $139 million was earmarked for tree canopy preservation and expansion. This is an exciting and necessary paradigm shift. Long-term funding and maintenance of the urban canopy as well as better interagency coordination is essential for productive stewardship. Toward this vision of care for the urban forest, Local Law 148, the Urban Forest Plan, was passed last year. The Mayor’s Office of Climate and Environmental Justice (MOCEJ) and Department of Parks and Recreation (DPR) are charged as the primary agencies to lead interagency coordination on the management and growth of the urban canopy to 30 percent land cover from the current coverage level, 22 percent. DPR and MOCEJ’s ownership of this task is a positive development. However, in order to effectively operationalize this funding, key agencies such as DPR must be adequately staffed. The Extreme Heat Coalition allied forces with the Forest For All NYC Coalition, the Playfair Coalition, and a multitude of green organizations to urge New York City Mayor Eric Adams to follow through with his campaign promise to allocate 1% of the City’s operating budget to our parks. However, in November of 2023, DPR’s budget was cut, resulting in a one-year delay for the Anti-Gun Community Garden, Trail Formalization, and Tree Risk Management programs and the loss of 284 staff positions via vacancies and a hiring freeze.
Recommendation 1: Preemptively set minimum temperatures for larger buildings to reduce energy loads.

In the summer of 2019, the City required owners and operators of large office buildings and department stores to set their thermostats to 78 degrees to conserve energy. This executive order was done to prevent blackouts caused by excessive energy demand. As days over 90 degrees could potentially reach up to 69 days per year by the 2050s, commercial cooling cannot take precedence over residential energy use. Especially as telecommuting policies grow increasingly common with a roughly 15 percent office building vacancy rate, cooling these buildings should be considered nonessential in heat emergency scenarios. The minimum temperature set for large offices and some commercial buildings should be increased to 78 degrees for all summer months. Mayor Adams should preemptively institute this simple energy conservation method.

Recommendation 2: Establish a maximum indoor temperature threshold for facilities that house heat vulnerable populations.

The State should require facilities that support vulnerable populations - such as domestic violence and homeless shelters, senior citizen housing, youth and senior centers, public libraries, and carceral facilities - to set a health-based maximum indoor temperature threshold. This threshold should be consistent with what is established by Medicaid.
Recommendation 3: Develop community-led, neighborhood-specific heat action plans to protect vulnerable populations during extreme heat events.

The City must work with neighborhoods to create heat action plans. Community boards and local community-based organizations (CBOs) can be engaged to lead the work. It is vital for the City to provide a platform for community members, especially vulnerable populations that are most impacted by extreme heat, to learn about the health risks they are exposed to and actively participate in developing plans to mitigate and respond to rising temperatures. This community-involved effort will not only result in better plans, but it will increase awareness and risk perception of extreme heat amongst vulnerable communities.

In partnership with the East Harlem COAD and Harlem Emergency Network, WE ACT recently developed a neighborhood action plan to help Northern Manhattan residents understand and prepare for summer climate risks related to extreme heat and flooding. The Climate Ready Uptown Plan is a physical pamphlet that educates individuals and their families on how to prepare for extreme heat events, recognize the signs of heat-related illness, and build communication networks with vulnerable neighbors and community members. The plan also includes an interactive map to help uptown residents better understand their local climate risks. Members of WE ACT’s Climate Justice Working Group had the original idea for a local climate-related emergency tool, and community members led the planning, research, design, and distribution of the final product.
Recommendation 1: Develop and strengthen neighborhood-specific communication plans that promote the use of cooling centers.

The City’s heat plan needs to incorporate a communications strategy so that community members are familiar with the purpose and locations of cooling centers. More outreach with information about heat risks and safety is needed to promote cooling centers. All promotion material should be produced in multiple languages. The City should not rely exclusively on NotifyNYC text messages to alert community members of heat advisories. Despite trends towards a digital format, one third of all households in the city do not have access to the internet, with many of those households concentrated in Upper Manhattan, South Bronx, and Central Brooklyn. Thus, outreach efforts should include physical signage in New York City Housing Authority (NYCHA) and other affordable housing buildings and in public transportation services. People are more likely to trust information that comes from a familiar source. All community engagement should be coordinated with local organizations. An outreach improvement we would like to see more of is the leveraging of food distribution organizations like Meals on Wheels and City Harvest to disseminate heat safety information to vulnerable households in neighborhoods that have high heat vulnerability index scores without many libraries or recreation centers, the City should make funding available to community organization partners to act as cooling centers throughout the duration of heat season. Community members report that they prefer centers where they already gather and receive services. Supporting the work of anchor institutions reduces the dependency on communication strategies that shift behavior and instead brings services to residents in familiar spaces.
Recommendation 2: Install and upgrade cooling systems in public school buildings throughout the city.

New York State Governor Kathy Hochul announced in her 2024 State of the State Book the $59 Million “Clean Green Schools” Initiative to Improve Air Quality and Reduce Carbon Emissions in Pre-K-12 Schools. Through this program, the City must install and upgrade cooling systems in schools, prioritizing public schools that are in high heat vulnerable neighborhoods, and that are currently burning fuel oil. Not only will better thermal comfort improve academic and health outcomes for children, the program will provide employment opportunities to local residents.

Objective 4

Design and Implement New City and State Protocols to Protect NYCHA Populations from Heat-Related Health Illnesses

City and State agencies should collaborate to modify existing protocols and implement new ones that:

- improve city infrastructure to reduce heat retention;
- strengthen strategies to respond to extreme heat events;
- provide resources and training about heat and health knowledge to government staff and care personnel to increase their capacity to support vulnerable populations; and
- increase the collection, analysis, and reporting of heat-related health data.

This must be a cooperative task that avoids siloed efforts.
Recommendation 1: Provide additional funding for NYCHA to protect vulnerable residents and improve building efficiency.

Over half of the public housing residents reside in the City’s most heat-vulnerable neighborhoods. NYCHA residents are especially vulnerable to extreme heat. There are more than 62,000 NYCHA tenants over the age of 65. This is the fastest growing age group among NYCHA’s population and the most susceptible to health complications resulting from heat exposure.

Recommendation 2: Remove barriers to air conditioner use in NYCHA.

New York City should focus on providing additional support to NYCHA residents and federal housing residents. NYCHA should have free professional air conditioner installations and waive any additional fees that offset the cost of additional power they consume. It was alarming to learn that NYCHA was threatening to start eviction proceedings for residents that received a free air conditioner in the summer of 2020 through the “Get Cool NYC” program if they did not agree to an additional monthly utility fee. While NYCHA has walked back their stance and agreed to cover tenant’s utility costs through October 1, 2023, we believe that utility fees should be waived for all NYCHA residents that need access to an air conditioner.

Recommendation 3: Integrate low-emissions technologies and energy efficiency retrofits.

For long-term solutions to cooling access for vulnerable residents, NYCHA must upgrade building envelopes and install efficient heating and cooling technologies such as heat pumps. In August of 2022, Governor Hochul and Mayor Adams announced a $70M initial investment in the development and production of 30,000 heat pump units for use in NYCHA buildings, as part of the Clean Heat For All Challenge. While this is a good start, NYCHA estimates a need for approximately...
Recommendation 4: Expand access to resilience hubs in heat vulnerable neighborhoods.

NYCHA is currently exploring the possibility of retrofitting existing community spaces into resilience hubs in select locations across the city. Resilience hubs are community-serving facilities augmented to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life. NYCHA should consider the heat vulnerability index in its selection criteria when considering locations to pilot this new program, and retrofit future resilience hubs with upgraded, efficient air conditioners, backup generation in the case of a power outage, staff trained in identifying and responding to heat related illness, extra supplies like handheld fans and water, and programming for residents looking to escape the heat.

NYCHA must seize the historic funding opportunities presented by the Inflation Reduction Act, the Environmental Bond Act, and other funding streams to meet the cooling needs of its tenants without increasing their costs or greenhouse gas emissions.

156,000 window heat pumps over the next 5-10 years in order to provide clean heating and cooling to its full building portfolio.
OBJECTIVE 5

IMPLEMENT AND EXPAND CHANNELS OF COMMUNICATION WITH VULNERABLE POPULATIONS TO INCREASE AWARENESS OF EXTREME HEAT IMPACTS.

Recommendation 1: Expand and permanently fund the Be A Buddy Program.

The Be A Buddy Program was launched in 2017 to match community-based organizations with at-risk NYC residents. Check-ins from local volunteers help to ensure that the wellbeing of vulnerable populations, especially isolated senior citizens, is not compromised during extreme heat events. The Be A Buddy Program was initially a two-year pilot initiative to develop and test strategies. The program is currently available in East Harlem, Hunts Point, and Brownsville with the support of Union Settlement, The Point CDC, and Brooklyn Community Services. The City must allocate more funding to the DOHMH to expand the Be A Buddy program to at least five more heat vulnerable neighborhoods by 2026, and there is a clear path to identify neighborhoods that would benefit most. New York City Comptroller Brad Lander’s Office released the Overheated, Underserved report in 2022, which provided analysis on the top 10 most heat vulnerable neighborhoods with the fewest cooling centers per 100,000 residents. MOCEJ should pursue a variety of funding sources, including the Federal Emergency Management Agency’s (FEMA) Building Resilient Infrastructure and Communities and Hazard Mitigation Grant programs to support the growth of the Be A Buddy program.
Recommendation 2: Strengthen partnerships with faith communities.

Working with trusted organizations is an important strategy to increase communication channels with vulnerable populations. Thus, collaboration with faith communities should be encouraged as a way to share information about extreme heat with those who regularly attend churches, mosques, temples, and other houses of worship.

Recommendation 3: Require the announcement of extreme heat emergencies through an advance warning system.

The Federal Communications Commission (FCC) requires that broadcasters and cable operators provide information during immediate weather emergencies, such as hurricanes, floods, and heavy snows. This requirement should be updated to include extreme heat events. Currently, the FCC must broadcast the information so that it is accessible in English, to persons who are deaf or hard of hearing, and to persons who are blind or have visual disabilities.33 However, additional language requirements should be offered to increase inclusivity. The Extreme Heat Coalition seeks to inform the rollout of a more proactive, equitable extreme heat emergency announcement systems in cities experiencing the urban heat island effect. Advanced warning is necessary for community members to plan accordingly for heat disasters. Such announcements should continue to be updated as climate impacts and resident needs evolve.
OBJECTIVE 6

IMPLEMENT GREEN DESIGN TECHNIQUES AND INCREASE RENEWABLE ENERGY PRODUCTION TO PROMOTE NATURAL COOLING AND REDUCE NEW YORK CITY’S CARBON FOOTPRINT.

Recommendation 1: Plant vegetation and expand green spaces in neighborhoods with high heat vulnerability to reduce the urban heat island effect.

Shade from tree covering can help to naturally cool surrounding areas without the use of energy technologies that produce greenhouse gasses, such as air conditioners. Many heat vulnerable neighborhoods have less canopy, and this inequitable distribution must be rectified. City agencies should be poised to leverage funds from numerous Inflation Reduction Act-funded programs and the Environmental Bond Act in partnership with community-based organizations to implement urban greening projects informed by community needs. An exemplary project that could benefit from Environmental Bond Act funding is the Mott-Haven/Port Morris Waterfront Plan developed for several years with robust community participation by Mott Haven-Port Morris Community Land Stewards and South Bronx Unite. The plan connects several segments of waterfront access, incorporating new trails, parks, permeable pavements, bioswales, rain gardens, and green space both along the waterfront and in adjacent inland areas. These design elements help reduce the urban heat island effect as well as improve flood protection.
Recommendation 2: Advocate for equitable distribution of green roofs.

Currently, of the 736 green roofs in New York City, over 300 lie in Midtown and Downtown Manhattan while the rest are spread sporadically throughout the city. The City must prioritize installing green roofs in heat-vulnerable neighborhoods.

Recommendation 3: Advocate for increased tree planting and preservation in East Harlem.

An East Harlem street can be up to 31°F hotter than Central Park West. This is mostly due to the lack of street trees. Researchers at Portland State University found that formerly redlined places, including Harlem, are on average 5°F warmer than non-redlined neighborhoods. Trees are vital for mitigating urban heat island effect and can lower temperatures by up to 9 degrees, cut air conditioning use by 30 percent, and reduce heating energy use by a further 20-50 percent. The “Million More Trees” initiative is vital because of the need to plant more trees along the East 125th Street corridor – one of the areas in New York City with a disproportionate extreme heat burden.

Alongside the planting of new trees, East Harlem cannot afford to lose its mature trees. Most species of juvenile trees cannot provide substantial shade until they are at least 5-10 years old, and they have significantly fewer leaves to cool the air via evapotranspiration. Healthy, mature shade trees can limit temperature increases of shaded surfaces by 20–45°F and reduce peak summer temperatures by 2–9°F. The City must work to protect mature trees by adequately funding their maintenance, preventing unnecessary removals, and incentivizing homeowners with trees on their property to keep them alive. Local Law 148 mentioned in Objective 2 is an essential component of this and MOCEJ should engage in creative collaboration with residents and organizations that steward large green spaces to design incentives that will help preserve mature trees for as long as possible.
OBJECTIVE 1

EXPAND THE LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP) TO INCREASE ACCESS TO AIR CONDITIONERS AND REDUCE THE ECONOMIC BURDEN FOR VULNERABLE POPULATIONS.

Recommendation 1: Allocate more funding to the LIHEAP program to subsidize summer utility bills.

The New York State LIHEAP program allocates the majority of its funding to heating services. Just 4 percent of its budget is apportioned to cooling needs. Summers are getting longer and hotter, and with massive energy burden rates statewide combined with increasing utility rates, many low-income households will suffer in the heat to avoid the cost of running an air conditioner (AC). In order to adapt to the future of climate change, more financial capital is needed to increase the use of cooling technologies in New York city homes by expanding LIHEAP’s Cooling Assistance Program. Currently, LIHEAP funding is only enough to provide eligible residents with an AC worth up to $800 in value every five years. This is not helpful if the residents cannot afford to run the AC unit. The State must get more federal funding for the program in order to subsidize the cost of electricity for running air conditioners in the summer months. There are already several state models that serve as cases for a more robust energy safety net, including California’s sliding-scale, need-based model, which distributes $200-$800 in assistance funds, or New Jersey’s flat $300 benefit. Now is the time for New York’s state legislature to demonstrate its stated values by advocating for more federal funding to be allocated to the Cooling Assistance Program.
Recommendation 2: The New York State Office of Temporary Disability Assistance (OTDA) should be accountable to report the distribution of LIHEAP funds to disadvantaged communities (DACs).

In the New York State Plan report, the Office of Temporary Disability Assistance (OTDA) is accountable to report how the agency administers the program in alignment with the LIHEAP statute assurances, including the Reduction of Home Energy Needs. The Biden administration deemed LIHEAP a covered program under the Justice40 Initiative (J40), which requires 35 to 40 percent of investments in climate change, clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure to be invested in disadvantaged communities (as defined by the Climate and Economic Justice Assessment Tool indicators). Since LIHEAP is a targeted program to serve low-income households by reducing their energy burden and sustaining their access to heating and cooling, synergy between the program and J40 are fundamental. OTDA is also accountable to New York State’s Climate Leadership and Community Protection Act of 2019 (CLCPA), by which J40 was largely inspired. However, in the State Plan report for the past few years, the section titled Reduction of home energy needs, 2605(b)(16) - Assurance 16 includes questions like “Describe the impact of [...] activities [to provide services that encourage and enable households to reduce their home energy needs] on the number of households served in the previous Federal fiscal year” and “How many households applied/received services?” only received “N/A” responses to every question. Not only should OTDA be required to explain how its administration of LIHEAP funds helps alleviate energy burden, but it should also disclose how funds are distributed statewide to identify which census tracts need more targeted outreach and investment year-over-year in alignment with equity-driven climate legislation at the state and federal levels. Disclosure of the geographic distribution of LIHEAP funds will facilitate better management of LIHEAP toward CLCPA and J40 goals as well as support advocacy to equitably serve disadvantaged communities that are underserved. This can be layered with data on which programs are received most in disadvantaged community census tracts to identify and remedy discrepancies in geographic and demographic access to LIHEAP funding. mosques, temples, and other houses of worship.
OBJECTIVE 2

UPDATE WARRANTY OF HABITABILITY TO GUARANTEE ACCESS TO COOLING AND PREVENT DISPLACEMENT OF HEAT VULNERABLE TENANTS.

Recommendation 1: Shelter cooling provisions from Major Capital Improvement or Individual Apartment Improvement status.

New York State housing law includes a set of criteria to establish a standard for safe, livable housing that all landlords must guarantee to all tenants whether or not it is explicitly stated in the lease. This is called Warranty of Habitability, and such criteria includes access to a radiator in good repair, hot water, and intact, sealed windows amongst several others. These indicate an understanding by the State that temperature control at home is vital to maintaining health and safety. While an indoor maximum temperature law at the City level is necessary to expedite enforcement of the right to cooling, inclusion of functioning cooling devices within the Warranty of Habitability criteria not only mandates climate-informed healthy housing, but it would also prevent cooling retrofits in older housing from becoming a cause of large rent increases.

Cooling retrofits like heat pumps are scarcely serving low-income, heat-vulnerable residents. Even in scenarios where landlords want to make these improvements at their own expense, they are allowed to raise the rent beyond rent control or stabilization limits because they are considered Major Capital Improvements or Individual Apartment Improvements. When landlords make upgrades that fall under these categories, heat-vulnerable tenants often can no longer afford the new rent charge and higher wage earners move in. In order to prevent sacrificing the safety and
Objective 3

**NEW EFFICIENCY NEW YORK MUST PRIORITIZE UNDERSERVED LOW- TO MODERATE-INCOME AND DAC RESIDENTS.**

New Efficiency New York (NENY) is an initiative by the Public Service Commission (PSC) directing the New York State Energy Research and Development Authority (NYSERDA) and utilities to drive strategic investment into programs that will move the State toward its energy efficiency goal of saving 185 TBtu by 2025. NENY is subject to the State's commitment to ensure 35-40 percent of energy investments directly serve DACs as stipulated in the CLCPA, but interim reports have shown that the current rate at which energy efficiency investments (e.g., air sealing and insulation) and building electrification technologies (e.g., heat pumps) are being deployed is insufficient to meet the State's energy savings goal by 2025. Despite underperformance in the early stages of NENY, government agencies and utilities have a major role to play in ensuring the most overburdened residents can benefit from energy efficiency programs that can help reduce heat exacerbated illness and mortality. As federal investment into energy affordability programs and renewable energy generation will take several years to reach the necessary scale to serve everyone in need, the State must balance grid reliability and climate health equity by reducing energy demand through expanded access to more efficient cooling devices.

housing security of the most heat-vulnerable residents, Warranty of Habitability must include requirements for access to air conditioning, heat pumps, or other dehumidifying cooling devices.
Recommendation 1: NENY must facilitate funding for health and safety remediation.

Low- to moderate-income and DACs in particular struggle most to access energy efficiency programs. This can be attributed to a variety of factors including funding restrictions, systemic disinvestment in communities of color, and barriers to home ownership. While the Inflation Reduction Act is an unprecedented source of funding that can be applied to pre-electrification retrofits, over reliance on it results in funding flowing primarily to property owners who have well-maintained, electrification-ready buildings. As previously mentioned, redlining drastically influenced which residents were able to access loans from the federal housing authority for decades, favoring white homeowners over people of color and certain European immigrant groups. This further entrenched wealth disparities, as access to liquid capital and refinancing are the primary means for homeowners to undertake large-scale home repairs and improvements. The repercussions are still felt today as Black and Latinx residents have access to roughly a quarter of the amount of cash available to their white counterparts. Likewise, denial rates for refinancing and home improvement loans are nearly twice as high for Black and Latinx borrowers compared to white borrowers. Home ownership rates are lower for people of color in every region of the State, with white residents attaining homeownership at twice the rate of Black and Latinx New Yorkers. Therefore, as people of color are overrepresented amongst New York’s tenants, many cannot apply directly for programs because they don’t own the property.

Given these inequities, the State must design programs with flexible funding streams that prioritize homes in need of health and safety remediation and appeal to landlords because they are mutually beneficial to both property owners and their tenants. One such program that could be better positioned to meet these needs is Empower+, which helps 1-4 family low-income households receive energy assessments and no-cost installations from participating contractors as well as discounts on energy efficiency improvements. The New York State Department of Public Service should initiate a proceeding to review the use of
Recommendation 2: Consolidate and streamline access to information and funding for program applicants and contractors.

There can be a high administrative burden placed on residents and contractors to access all of the programs they are eligible for because each one has a separate application, despite many required fields for many programs overlapping. Additionally, program applicants often struggle to fill out the forms correctly, as evidenced by findings from the 2022 New York State Clean Heat Annual Report, which shows approximately 40 percent of applications have errors that are later corrected by contractors. Not only does the extra work delay the process, but it costs applicants more to compensate contractors for the additional administrative labor. To correct this, NYSERDA should develop a common application that matches resident profiles with all of the programs from which they can benefit. California’s SB 755, California Layered Energy Applications for Residents (CLEAR) Act, calls for the creation of a centralized resource hub that aggregates applications and information about state, local, utility energy efficiency and beneficial electrification programs, affordability programs, and financing. If NYSERDA does create a centralized application portal, applications should be simplified based on a co-design process that incorporates applicants, community-based organization, and contractors to preempt common application mistakes.
OBJECTIVE 4

MANDATE WORKERS’ PROTECTIONS AGAINST EXTREME HEAT.

Recommendation 1: Pass the Temperature Extreme Mitigation Program Act.

All employees should be entitled to a safe work environment, irrespective of their industry, immigration, or residency status. This is not the case for thousands of workers exposed to temperature extreme hazards that are growing more severe and frequent due to climate change. The Temperature Extreme Mitigation Program (TEMP) Act seeks to address this by requiring workers in industries with frequent exposure to heat stress and strenuous labor to be provided with a range of accommodations to prevent temperature-related injury or death. Once passed, the TEMP Act would ensure agriculture, construction, landscaping, delivery, car wash, and food service workers receive the following rights and protections:

- Access to hydration
- Paid 10-minute cool-down breaks
- Access to shade
- PPE provided by the employer
- Requires vehicles and indoor workplaces to provide AC
- Requires employers to have an extreme temperature adaptation plan
- Worker acclimatization periods
- Heat stress prevention education and training.
- Multilingual signage and materials about occupational temperature safety practices
- Whistleblower protections (which are especially vital for noncitizen workers who are often targeted for exploitative labor or employer retaliation)
OBJECTIVE 5

MUNICIPALITIES, ELECTED OFFICIALS, AND ORGANIZATIONS, ADVOCATE FOR NEW YORK POWER AUTHORITY–OWNED RENEWABLE ENERGY PROJECTS.

In 2023, New York State passed the Build Public Renewables Act (BPRA), which enables the New York Power Authority (NYPA) to develop, own, and operate renewable energy generating projects -- either alone or in collaboration with other entities. The BPRA created the Renewable Energy Access and Community Help (REACH) program, which will provide electric bill credits for low-income households across the state. REACH will benefit low-income New Yorkers by allocating revenue from NYPA-owned renewable energy generation projects into a credit that they will receive on their monthly utility bill. Low- and moderate-income tenants and owners in disadvantaged communities would receive bill credits from small-scale and large-scale renewable energy projects in their communities.
OBJECTIVE 6

THE STATE SHOULD SUPPORT EXTREME HEAT ACTION PLAN IMPLEMENTATION BY PROVIDING FUNDING TO EXISTING ADAPTATION PROGRAMS.

Governor Hochul’s 2024 State of the State uplifted the Clean Green Schools program as it will support clean heating and cooling, renewable energy, and green roof installations in public schools, “encouraging” awarded schools to act as cooling centers. However, it should not be mistaken as a solution to the lack of funding for Cooling Center Programs for a few reasons. Municipalities have to make use of a wide range of public facilities beyond schools, including libraries, recreation centers, senior centers, and NYCHA facilities as well as partner with private organizations who volunteer their space to create a robust network of cooling centers. Even utilizing a variety of building and partner types, there are still gaps in service. For example, East Flatbush was ranked first amongst the most heat-vulnerable neighborhoods in New York City with the fewest cooling center locations, having only two open locations per 162,446 people. Additionally, WE ACT’s Climate Justice Working Group members conducted an audit across several Northern Manhattan locations. They found a pattern of cooling centers lacking clear wayfinding signage, community outreach, staff training, and a standard of quality across sites that set a baseline for extended hours of operation, culturally relevant programming, and community feedback about their experiences at cooling center sites. These findings relate to a lack of funding for staff to fulfill the responsibilities that come with preparing for and responding to heat-related emergencies. Further, because cooling center locations do not alter their hours to ensure they are available through a heat emergency, residents cannot consistently rely on their nearest location to be open. In New York City, operating cooling center locations are only announced once a heat advisory has been released by the National Weather Service. Statewide, the New York State
Department of Health website lists locations outside of New York City, advising residents to call and check if the cooling center location they plan to visit is open. Some counties have “no cooling centers reported.” This limits resident capacity to make a heat emergency plan, raising additional challenges for seniors and residents with mobility impairments to access services. While city leaders should prioritize creating long-term funding streams for climate adaptation programs, including cooling centers, statewide funding is necessary to set standards of service, ensure alignment with statewide resilience and emissions reduction goals, and fairly compensate both municipal workers and private staff operating cooling centers.

Cooling retrofits like heat pumps are scarcely serving low-income, heat-vulnerable residents. Even in scenarios where landlords want to make these improvements at their own expense, they are allowed to raise the rent beyond rent control or stabilization limits because they are considered Major Capital Improvements or Individual Apartment Improvements. When landlords make upgrades that fall under these categories, heat-vulnerable tenants often can no longer afford the new rent charge and higher wage earners move in. In order to prevent sacrificing the safety and housing security of the most heat-vulnerable residents, Warranty of Habitability must include requirements for access to air conditioning, heat pumps, or other dehumidifying cooling devices.
OBJECTIVE 7

PASS THE NY HEAT (NEW YORK HOME ENERGY AFFORDABLE TRANSITION) ACT.

A critical part of preserving thermal safety for all New Yorkers is access to affordable energy. The NY HEAT Act (A.4592/S.2016) includes language that limits energy burden for all residents to six percent of their monthly income, empowers the Public Service Commission to set regulations that will drive utility spending to support Climate Leadership and Community Protection Act goals, and ends the subsidy for expansion of gas infrastructure, which would save ratepayers an estimated $200 Million annually. Ending these provisions in the law would initiate the energy transition the state needs to holistically stem ballooning utility debt and facilitate community scale decarbonization. The proliferation of sustainable cooling technologies depends on decisive and bold policy like this. Climate Justice advocates have been strongly united in their support for NY HEAT and the legislature cannot sideline equitable access to energy and emissions reductions commitments any longer.
New York must pursue both short-term and long-term objectives to mitigate the negative impacts that extreme heat can have on the health of vulnerable populations. This will require collaboration and cooperation between government agencies, local organizations, community members, and private companies such as Con Edison. Plans should focus on expanding extreme heat risk perception, increasing LIHEAP funds for the cooling assistance program, advocating for policy reforms, strengthening emergency plans, improving the use and services of cooling centers, supporting changes to City and State protocols, facilitating community-led resiliency planning, and implementing green design and energy efficiency retrofits.

Additionally, New York City should analyze and evaluate other cities’ heat initiatives and cooling programs to develop creative and effective policies. For instance, in India, the annual Ahmedabad Heat Action Plan aims to provide a framework for the implementation, coordination, and evaluation of extreme heat response activities across city agencies in Ahmedabad. The plan emphasizes heatwave preparedness and response, and includes four pillars: building public awareness and community outreach; an early warning system and inter-agency coordination; capacity building among health-care professionals; and adaptive efforts to reduce heat in the city. The Plan’s primary objective is to alert those populations most at risk of heat-related illness that extreme heat conditions either exist or are imminent, and to take appropriate precautions. All programs, projects, and policies implemented by the City and State must champion social equity and prioritize supporting low-income households and people of color. The Extreme Heat Coalition would like to see a holistic, multi-agency approach to mitigating the often fatal impacts of extreme heat.
APPENDIX 1

List of City objectives and corresponding recommendations.

1. **Advocate for legislative action in the City Council to mitigate extreme heat impacts.**
   a. Support legislation to codify cooling centers in NYC.
   b. Establish Indoor Maximum Temperature

2. **Coordinate emergency planning strategies during extreme heat events to prevent power outages and promote safety.**
   a. Preemptively set minimum temperatures for larger buildings to reduce energy loads.
   b. Establish a maximum indoor temperature threshold for facilities that house heat vulnerable populations
   c. Develop community-led neighborhood-specific heat action plans to protect vulnerable populations during extreme heat events.

3. **Encourage the use of and improve the amenities offered by cooling centers.**
   a. Develop and strengthen neighborhood-specific communication plans that promote the use of cooling centers.
   b. Install and upgrade cooling systems in public school buildings throughout the City.

4. **Design and implement new City and State protocols to protect vulnerable populations from heat-related health illnesses**
   a. Provide additional funding for NYCHA to protect vulnerable residents and improve building efficiency.
   b. Remove barriers to air conditioner use in NYCHA
   c. Integrate low-emissions technologies and energy efficiency retrofits.
   d. Expand access to resilience hubs in heat vulnerable neighborhoods

5. **Implement and expand channels of communication with vulnerable populations to increase awareness of extreme heat impacts.**
   a. Expand and permanently fund the Be a Buddy Program
   b. Strengthen partnerships with faith communities.
   c. Require the announcement of extreme heat emergencies through the emergency broadcast system.

6. **Implement green design techniques and increase renewable energy production to promote natural cooling and reduce New York City’s carbon footprint**
   a. Plant vegetation and expand green spaces in neighborhoods with high heat vulnerability to reduce the urban heat island effect.
   b. Advocate for equitable distribution of green roofs.
   c. Increase research and investment in renewable energy sources.
APPENDIX 2

List of State objectives and corresponding recommendations.

1. Expand the Low Income Home Energy Assistance Program (LIHEAP) to increase access to air conditioners and reduce economic burden for vulnerable populations
   a. Allocate more funding to the LIHEAP program to subsidize summer utility bills
   b. The New York State Office of Temporary Disabilities Assistance (OTDA) should be accountable to track and report the distribution of LIHEAP funds to disadvantaged communities.

2. Update Warranty of Habitability to guarantee access to cooling and prevent displacement of heat vulnerable tenants
   a. Shelter cooling provisions from Major Capital Improvements and Individual Apartment Improvement status

3. New Efficiency New York must prioritize underserved low- to moderate-income and DAC residents.
   a. NENY must facilitate funding for health and safety remediation.
   b. Consolidate and streamline access to information and funding for program applicants and contractors.

4. Mandate workers’ protections against extreme heat.

5. Municipalities, elected officials, and organizations, advocate for New York Power Authority-owned renewable energy projects.
   a. The State should support Extreme Heat Action Plan implementation by providing funding to existing adaptation programs.
ENDNOTES

16. Requiring the department of environmental protection to post a map of green roofs online, Int 0102-2022, New York City.
17. Requiring the DOE to conduct a study on the feasibility of installing green roofs on schools, Int 0233-2022, New York City.


34. South Bronx Unite, Mott-Haven Port Morris Waterfront Plan https://static1.squarespace.com/static/5fd030e7e589ab2987f36f75/t/650a1bd4f7f42448a1d91db4/1695161307501/Mott+Haven++Port+Morris+Waterfront+Plan+Brochure+-+Sep+19+2023.pdf 19 Sep. 2023


39. (See 22)


45. Hyun Choi, Jung; Mattingly, Peter J. What Different Denial Rates Can Tell Us About Racial Disparities in the Mortgage Market | Urban Institute. 13 Jan. 2022,


