PLANNING FOR SEA LEVEL RISE

POLICY STATEMENT

The State of California anticipates that relative sea level rise (SLR) projections stemming from greenhouse gas emissions and related climate change pose significant economic, environmental and social risks to communities along the San Francisco Bay Shoreline, including the City of Palo Alto. Research shows that these projections may worsen if greenhouse gas emission trajectories continue unabated.\(^1\) Greenhouse gases and thermal expansion are the primary cause of Antarctic and Greenland ice melt which in turn are the primary source of SLR globally and in San Francisco Bay.

Sea level rise in San Francisco Bay is anticipated to range between three feet to more than ten feet by 2100 with rising tides likely thereafter.\(^2\) In Palo Alto, many City services and infrastructure that are essential to the City’s public health, safety and economy are located within areas that are predicted to be inundated by Bay water if adaptation measures are not implemented.\(^3\) SLR threatens the operational integrity of critical services and facilities, e.g., Palo Alto’s electrical, gas, water and wastewater utilities, the Municipal Service Center, the Palo Alto Airport, Highway 101 and surrounding roads. Business districts and residential neighborhoods within the projected SLR area are vulnerable to a rising Bay and potential future FEMA insurance zone requirements.

SLR is also likely to affect the elevation and salinity of groundwater close to the Bay. Rising groundwater could have impacts on belowground infrastructure which may be subject to corrosion and buoyancy effects. In the case of very low-lying areas, groundwater may result in surface flooding and long-term ponding.

Under current SLR predictions, the Palo Alto Baylands may be submerged by mid-century which would eliminate their ability to buffer upstream or Bayside flooding sources, attenuate storm surge or sequester carbon. The encroachment of Bay water may alter or eliminate habitat for endangered species that reside in Palo Alto Baylands and the millions of birds that use the Palo Alto segment of the Pacific Flyway for seasonal migration. The recreational and inspirational services of the Palo Alto shoreline could change if Baylands trails, playing fields and golf course are surrendered to encroachment of San Francisco Bay.

The decisions that Palo Alto makes in future years to adapt to rising tides extend beyond the City’s borders. Implications with built features such as levees will impact (help or imperil) adjacent communities and thus require close coordination with surrounding local and regional agencies.

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\(^2\) Reference 1, page 18.

Recognizing the hazards of SLR to Palo Alto and adjacent communities, the City will implement the procedures of this policy for the benefit of future generations of all species who are dependent upon how Palo Alto responds to what is referred as a “...slow moving disaster.” This policy is consistent with the City’s Comprehensive Plan (adopted November 2017), the Sustainability and Climate Action Plan (S/CAP) (November 2016) and related Sustainability Implementation Plans (SIPs), the Local Hazard Mitigation and Adaptation Plan (March 2017), the Baylands Master Plan (2008), the Baylands Comprehensive Conservation Plan. Definitions and terminology relevant to this policy are listed in Appendix A.

PROCEDURES

1. **The City will recognize that the best way to avoid long-term impacts from the worst SLR predictions and to minimize adaption response costs is to reduce greenhouse gas (GHG) contributions** locally and to support regional, state and national initiatives that reduce GHGs. To this end, the City will maintain a Sustainability and Climate Action Plan and implement the related Sustainability Implementation Plans;

2. **Palo Alto will lead by example and coordinate on SLR studies and planning efforts** with East Palo Alto, Mountain View, and other cities and public agencies as needed; counties, utilities, and public-private funding partnerships;

3. **Palo Alto will reference the *Ocean Protection Council (OPC) 2018 Probabilistic SLR Projections* published by the State of California (Table 1) for proposed development projects, renovations and possible property acquisitions and other City planning** unless a more suitable reference is identified and agreed upon by local agencies tasked with SLR preparedness. Related:

   a. City of Palo Alto, business and residential investments in new property, development, and infrastructure should be designed based on OPC SLR projections for the useful life of the asset to avoid flooding or erosion.

   b. Upgrades to existing property or infrastructure that is considered less-critical (not essential to immediate public health and safety, e.g. trails or playing fields) should consider the impacts of SLR beyond 2050 using the Low Risk Aversion or Medium-high Risk Aversion Projection listed in Table 1;

   c. For critical development and infrastructure (e.g., wastewater treatment facility or utilities that are essential to public health and safety), a risk assessment should be completed based on the SLR projections to 2100 or the lifetime of the building using the Medium-high or Extreme Risk Aversion Projections;

   d. All designs and engineering strategies, where possible and financially feasible, should be adaptable to changing climate predictions. Each new development should be required to develop and maintain an individual “adaptation pathway plan” to prepare for changes in rising sea level, and related groundwater intrusion.

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Table 1–Ocean Protection Council 2018 Probabilistic Sea Level Rise Projections
Rising Seas Report, State of California Sea Level Rise Guidance*

<table>
<thead>
<tr>
<th>Year</th>
<th>Low Risk Aversion Likely Range (ft.)</th>
<th>Medium-high Risk Aversion (ft.)</th>
<th>Extreme Risk Aversion (ft.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>66% Probability</td>
<td>0.5% probability 1-in-200 chance</td>
<td>(No probability yet available)**</td>
</tr>
<tr>
<td>2030</td>
<td>0.5</td>
<td>0.8</td>
<td>1.0</td>
</tr>
<tr>
<td>2040</td>
<td>0.8</td>
<td>1.3</td>
<td>1.8</td>
</tr>
<tr>
<td>2050</td>
<td>1.1</td>
<td>1.9</td>
<td>2.7</td>
</tr>
<tr>
<td>2060</td>
<td>1.5</td>
<td>2.6</td>
<td>3.9</td>
</tr>
<tr>
<td>2070</td>
<td>1.9</td>
<td>3.5</td>
<td>5.2</td>
</tr>
<tr>
<td>2080</td>
<td>2.4</td>
<td>4.5</td>
<td>6.6</td>
</tr>
<tr>
<td>2090</td>
<td>2.9</td>
<td>5.6</td>
<td>8.3</td>
</tr>
<tr>
<td>2100</td>
<td>3.4</td>
<td>6.9</td>
<td>10.2</td>
</tr>
</tbody>
</table>

SLR rates in this table show the upper-range predictions for how SLR may increase in future years and the SLR rate assumptions that should be used for different facilities and development. Probabilistic projections in the first two columns are with respect to a baseline of the year 2000, or more specifically the average relative sea level over 1991 - 2009. These numbers do not include impacts of El Niño, storms or other acute additions to sea-level rise. The time period referenced should be based on the useful life of the structure. The low and medium-risk projections listed in this table may underestimate the likelihood of extreme sea-level rise, particularly under high greenhouse gas emissions scenarios which as the writing of this policy are projected to continue to increase.

Not all infrastructure and development need to be designed to withstand the most extreme SLR predictions. This table suggests the types of facilities that could be designed to withstand the low, medium or extreme risk scenarios. Buildings for which there is an extreme risk aversion (e.g. wastewater treatment facilities) require more extensive and thus more costly designs and retrofits.

*The relative SLR heights above as it relates to Palo Alto’s shoreline can be viewed at Adapting to Rising Tides Bay Shoreline Flood Explorer online tool at [https://explorer.adaptingtorisingtides.org/home](https://explorer.adaptingtorisingtides.org/home).

** OPC guidance also includes an Extreme Risk Aversion scenario (aka H++ Scenario (Sweet et al 2017 Single scenario)). The probability of this scenario is currently unknown, but its consideration is important, particularly for high stakes, long-term decisions for critical infrastructure and given the uncertainties of projected GHG emissions discussed above.

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4. The City will develop a multi-year SLR Implementation Plan to coordinate internal and regional SLR planning, project funding and public outreach. The Plan will include:

a. a SLR vulnerability assessment, which will:
   i. identify critical and less-critical City infrastructure and ecosystem assets to manage risks given predicted SLR scenarios through 2100 and beyond;
   ii. identify hazards and determine tolerable risks of the City and community members (risk = hazard x exposure x vulnerability; risk ($/year) = frequency (events/year) x consequences ($/event));
   iii. include an economic assessment of SLR vulnerability for public and private property and cost estimates for inaction;
   iv. engage community members in the process.

b. a SLR adaptation plan and timeline which will:
   i. align with the intent and language of the City’s various plans, policies and documents that intersect with SLR Policy and Plan (e.g., the Comprehensive Plan, Sustainability and Climate Action Plan, Local Hazard Mitigation Plan, Baylands Comprehensive Conservation Plan, Baylands Master Plan, Regional Water Quality Control Plant Long Range Facility Plan, Urban Water Management Plan, Recycled Water Strategic Plan etc.);
   ii. include a table of prioritized adaptation pathways to manage risks to natural and built assets based on the SLR Vulnerability Assessment. Adaptation pathways provide a menu of recommendations and logically staged phases for adaptation over time based on triggers related to SLR levels. Adaptation pathways factor in cost/benefits, the lengthy time to plan, fund and build response strategies and potential additional benefits of carbon sequestration, GHG reduction, wildlife protection and social equity;
   iii. address budget and funding considerations for additional or existing staff to perform SLR planning, adaptation and Capital Improvement Projects (CIPs);
   iv. provide guidance on managing and enhancing Baylands, creek and open space services ecosystem services to mitigate SLR impacts through carbon sequestration and absorption. Examples of this include the use of horizontal levees, expanding or improving Baylands habitat; this guidance should consider the use of the Baylands Comprehensive Conservation Plan, and the concept of “Operational Landscape Units” developed by San Francisco Estuary Institute which delineate Bay shoreline ecosystem functions and services within the natural and built environment and not by jurisdictional boundaries, and;
v. require the development of educational materials and technical assistance for staff and developers, including:
   a. a checklist and primer on SLR, risk and sharing risk, and planning guidance;
   b. technical and regulatory guidance to City engineers and public developers so that projects are designed based on accepted OPC SLR assumptions and which prompt design-standard revisions, and protect, adapt, retreat responses for threatened areas;
   c. a risk assessment process to be used during CIP site selection, planning and property purchases;
   d. a SLR projection zone map which also shows the intersection of the FEMA flood zone;
   e. a development plan for public and private property anticipated to be impacted by SLR which may include:
      v. changing the city zoning map, where feasible, and amending requirements, restrictions, or municipal codes to be stricter than state or federal requirements as necessary and when feasible to reduce risks;
      vi. adding conditions of approval for project permits in areas where there is a SLR risk;
      vii. establishing geographic areas and/or triggers for requiring consideration of relocation;
      viii. developing restrictions or additional criteria; and
         ix. funding identification
      x. educate and engage community members in the process of SLR planning meeting with stakeholders (e.g., realtors, property owners, etc.) to educate them about SLR and the options, tradeoffs, and costs, for resilience;
      xi. establish interdepartmental SLR Planning responsibilities SLR into City procedures and planning listed in Table 2–Departmental Responsibilities for Sea Level Rise Planning.

<table>
<thead>
<tr>
<th>Lead Department</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative Services Division</td>
<td>1. Revise Purchasing Department construction solicitation templates and contract documents to include SLR and sustainability considerations.</td>
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<tr>
<td></td>
<td>2. Prioritize SLR planning equal to other performance indicators for projects within projected SLR areas.</td>
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<tr>
<td>City Manager’s Office</td>
<td>1. Implement the Sustainability and Climate Action Plan to reduce greenhouse gas emission contributions.</td>
</tr>
<tr>
<td></td>
<td>2. Include SLR update with annual Earth Day and Sustainability Implementation Plan reporting.</td>
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<tr>
<td></td>
<td>3. Consider development of key performance indicators to track if the City is meeting its SLR planning goals.</td>
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<tr>
<td></td>
<td>4. Provide outreach through City Manager Office communication channels about how the City is preparing for sea level rise in</td>
</tr>
<tr>
<td>Coordination</td>
<td>Action</td>
</tr>
<tr>
<td>--------------</td>
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</tr>
<tr>
<td>Community Services/Open Space</td>
<td>Implement the recommendations of the 2019 Palo Alto Baylands Vulnerability Assessment for flood control, access, non-recreational features and facilities, habitats and wildlife where feasible, e.g.: 1. Seek funding to expand and enhance Baylands habitat to leverage wave attenuation, water absorption and other ecosystem services that mitigate SLR. 2. Develop climate-smart planting palettes that are projected to survive under changing climate conditions.</td>
</tr>
<tr>
<td>Office of Emergency Services</td>
<td>Continue to consider sea level rise in community risk assessments, such as THIRA and LHMP, with appropriate risk considerations and weighting.</td>
</tr>
<tr>
<td>Planning &amp; Community Environment</td>
<td>1. Update zoning code and related requirements, such as design standards for public and private development based on OPC predictions.</td>
</tr>
<tr>
<td>Public Works–Airport</td>
<td>1. Plan for SLR to reduce risk of impacts to Airport operations. 2. Seek funding opportunities with the Federal Aviation Administration and Caltrans Division of Aeronautics.</td>
</tr>
<tr>
<td>Public Works–Interdepartmental</td>
<td>1. Coordinate groundwater management should SLR rise groundwater tables.</td>
</tr>
<tr>
<td>Public Works–Engineering</td>
<td>1. Plan, design, identify funding, build and maintain resiliency features in City planning and CIP projects per the City’s Comprehensive Plan, e.g.: a) Manage the preparation of SAFER feasibility report and potential environmental review, funding, public outreach and construction of SAFER levees and related projects to mitigate SLR. b) Seek grants and other funding for design alternatives and structures that mitigate SLR. 2. Manage the implementation of large-scale stormwater infrastructure rehabilitation projects to minimize flooding from upstream sources, e.g.,: a) Construct the high priority projects identified through Storm Drain Master Plan and listed with the Stormwater Management Fee and consider integration of GSI Plan elements. b) Address FEMA regulations and flooding risks associated with 100-year storm events for the design life of the structure. c) Manage stormwater rebate program and coordinate with development services, inspect project sites once</td>
</tr>
</tbody>
</table>

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**Note:** The above text is a representation of the document content. The table format and layout have been adjusted for clarity and readability.
completed and issue rebates to property owners for installed rainwater capture devices.

d) Work with Development Services to help developers of private projects comply with SLR policy and plans and FEMA regulations.

e) Implement County Hazard Mitigation Plan (FEMA).

f) Develop and implement a Green Stormwater Infrastructure Plan per Municipal Regional Stormwater Permit Requirements.

1. Coordinate internal discussions on SLR planning at a frequency that facilitates proactive planning, e.g., quarterly or as needed.

2. Manage SLR risks to allow for ongoing operations of the RWQCP and the sanitary landfill;

3. Seek opportunities and funding to enhance the Baylands ecosystem and build and nature-based features such as horizontal levees.

4. Manage groundwater in recognition that SLR will push groundwater levels inland and closer to the surface.


6. Conduct Public Outreach on SLR education and planning in coordination with the City Manager’s Office and Utilities.

7. Prepare Policy updates.

8. Lead Green Stormwater Infrastructure planning and implementation.

1. Execute fleet-related actions in the SIPS.

Public Works–Public Services

Transportation

Utilities

1. Execute energy portfolio-related actions in the SIPS Plan for Utilities-related asset protection from flooding, SLR and erosion.

2. Increase climate messages in ongoing water conservation public awareness campaigns in coordination with the City Manager’s Office and Public Works–Watershed Protection.

5. **Policy Limits:** This policy does not establish specific requirements for all projects because each site condition is unique, but instead provides expectations for developing guidance and tools to answer key building and infrastructure design and SLR response strategies. This policy also recognizes that not all codes and regulations that govern construction are yet synchronized with OPC SLR predictions, however Palo Alto will incorporate SLR guidance and planning into its own construction and planning process proactively for both public and private structures until regional standards are adopted for use.
Appendix A: Policy Definitions and Related Terminology

Adaptation Pathway: “Pathways” in relation to adaptation is an approach designed to schedule adaptation decision-making. It identifies the decisions that need to be taken now and those that may be taken in future. The approach supports strategic, flexible and structured decision-making. The pathways approach allows decision makers to plan for, prioritize and stagger investment in adaptation options. Trigger points and thresholds help them identify when to revisit decisions or actions. Examples of pathways approaches can be translated into visual aids such as “route maps” that support communication and consultation with stakeholders. The adaptation pathway approach has been successfully applied in adaptation planning for infrastructure and water management projects, and broader cross-sector adaptation planning⁶.

Baylands: Lands which are located between the lines of mean high tide and mean low tide (California Coastal Commission Sea Level Rise Policy Guidance).

Baylands Comprehensive Conservation Plan: provides specific programs and projects to achieve the goals and policies of the Baylands Master Plan.

Baylands Master Plan: A plan prepared by the City of Palo Alto to provide a framework and guide for actions in the Baylands that seek to preserve the area’s unique natural, recreational and flood-prevention resources.

Capital Improvement Project (CIP): A Capital Improvement Project (CIP) is a project that helps maintain or improve a City asset, often called infrastructure. To be included in the City of Palo Alto Capital Budget, a project must meet the following criteria:

- Must have a minimum cost of $50,000 for each stand-alone unit or combined project.
- Must have a useful life of at least five to seven years (the purchase or project will still be functioning and not be obsolete at least five to seven years after implementation).
- Must extend the life of an existing asset or provide a new functional use for an existing asset for at least five years. Examples include extensive roof rehabilitations. These improvements are distinguished from ongoing maintenance work that may extend the life of the asset but is done on a routine basis.

Climate change: Any long-term change in climate conditions in a place or region, whether due to natural causes or as a result of human activity.

Comprehensive Plan The City of Palo Alto Comprehensive Plan (or Comp Plan) is the primary tool for guiding preservation and development in Palo Alto. The Plan fulfills the State requirement that the City adopt a General Plan to serve as its constitution. The Plan provides a foundation for the City’s development regulations, capital improvements program, and day-to-day decisions.

Critical infrastructure: City built assets with a long-projected life span (greater than 50 years) which if compromised by rising tides could potentially have catastrophic results on public health, safety or well-being, e.g., wastewater treatment facilities, stormwater infrastructure, levees or impoundments, bridges along major evacuation routes, airports, seaports, railroads, and major highways, EOC/Fire/Police/Healthcare, schools, homeless shelters, landfills and contaminated sites.

Less-critical Infrastructure: has an expected lifetime of 10-20 years or is replaceable and adaptable, or has limited interdependencies and limited consequences should the system fail or be inundated by water. Examples include isolated parks, unpaved trails.

Design life: The life expectancy of an asset or product as determined during design. As opposed to useful life (see below).

Erosion: The wearing away of land by natural forces; on a beach, the carrying away of beach material by wave action, currents, or the wind, the loss of marsh due to the erosion of the marsh edge by waves. Development and other non-natural forces (e.g., water leaking from pipes or scour caused by wave action against a seawall) may create or worse erosion problems (California Coastal Commission Sea Level Rise Policy Guidance).

Facilities: All buildings, communications facilities, energy systems, industrial facilities, all transportation networks, water and wastewater systems, and parks.

Flood (or Flooding): Refers to normally dry land becoming temporarily covered in water, either periodically (e.g., tidal flooding, king tides) or episodically (e.g., storm surge or tsunami flooding).


Green Stormwater Infrastructure (GSI): Infrastructure that uses vegetation, soils, and natural processes to manage stormwater runoff and reduce peak flows in flood control channels or creeks. Examples of GSI include landscape-based stormwater “biotreatment” using soil and plants ranging in size from grasses to trees; pervious paving systems (e.g., interlocking concrete pavers, porous asphalt, and pervious concrete); rainwater harvesting systems (e.g., cisterns and rain barrels); and other methods to capture and use stormwater as a resource.

Groundwater: The water found below the surface of the land and contained in the pore spaces of saturated geologic media (sand, gravel). Groundwater is either rain water that has seeped through the soil surface and by means of gravity of soil conditions drained from high to lower elevation areas. Groundwater can also come from the bay transferred via bay mud under the existing levees. Groundwater can be source of water found in wells and springs.
Hazard: A situation involving danger such as coastal flooding, earthquake rainfall and local flooding.

Local Hazard Mitigation Plan: The Federal Disaster Mitigation Act of 2000 (DMA) requires all cities, counties, and special districts to adopt a Local Hazard Mitigation Plan (LHMP) to receive disaster mitigation funding from the Federal Emergency Management Agency (FEMA). Hazard mitigation planning is the process used by state, local and tribal leaders to understand risks from natural hazards and develop long-term strategies to reduce the impacts of disasters on people, property, and the environment. The Palo Alto Local Hazard Mitigation Plan is updated every three years.

Mean Sea Level: The average relative sea level over a period, such as a month or a year, long enough to average out transients such as waves and tides.

Ocean Protection Council (OPC): The Council was created pursuant to the California Ocean Protection Act (COPA), which was signed into law in 2004 by Governor Arnold Schwarzenegger. The mission of the OPC is to “…ensure that California maintains healthy, resilient, and productive ocean and coastal ecosystems for the benefit of current and future generations. The OPC is committed to basing its decisions and actions on the best available science, and to promoting the use of science among all entities involved in the management of ocean resources.” The OPC published the State of California Sea Level Rise Guidance Document and subsequent updates which provides an estimated range of predicted SLR and subsequent updates.

Operational Landscape Units: A delineated area that effectively provides specific ecosystem functions and services within the natural and built environment.

Pacific Flyway: A major north-south flyway for migratory birds in America, extending from Alaska to Patagonia. Every year, migratory birds travel some or all of this distance both in spring and in fall, following food sources, heading to breeding grounds, or travelling to overwintering sites.

Protect, adapt, retreat strategies: Responding to SLR generally involves three general concepts:

- Protect: Implementing strategies that reduce the risk of SLR impacts to land e.g., levees, horizontal levees, floodwalls, flood gates, and wetlands;

- Adapt: Adjusting to natural or human systems in response to actual or expected climatic stimuli or their effects, which minimizes harm or takes advantage of beneficial opportunities. This includes building any new or substantially-improved structures elevated above future flood levels or as structures that can be submerged without sustaining appreciable damage.

- Retreat: Surrendering an area partially, seasonally or completely to rising sea level;

Regional Water Quality Control Plant (RWQCP): Owned and operated by the Palo Alto, the Plant treats wastewater for the communities of Los Altos, Los Altos Hills, Mountain View, Palo Alto, Stanford University and the East Palo Alto Sanitary District. The mission of the RWQCP is to protect San Francisco Bay by
cleaning and treating wastewater before it is discharged.

**Relative Sea Level:** Sea level measured by a tide gauge with respect to the land upon which it is situated.

**Risk:** Often expressed as “hazard x exposure x vulnerability,” in terms of costs per year it can be expressed as “frequency (events/year) x consequences ($/event).

**SAFER Bay Project Feasibility Report:** SAFER (Strategy to Advance Flood protection, Ecosystem and Recreation along San Francisco Bay) has prepared a feasibility report that is in the review and comment phase. Once City staff comments are made and report revised as needed, the report will be available for public review and comment.

**Sea level:** The height of the ocean relative to land; tides, wind, atmospheric pressure changes, heating, cooling, and other factors cause sea level changes.

**Sea level rise (SLR):** Sea level can change, both globally and locally, due to (a) changes in the shape of the ocean basins, (b) changes in the total mass of water and (c) changes in water density. Factors leading to SLR under climate change include both increases in the total mass of water from melting land-based snow and ice, and changes in water density from an increase in ocean water temperatures and salinity changes. Relative SLR occurs where there is a local increase in the level of the ocean relative to the land, which might be due to ocean rise and/or land level subsidence.

**Storm Surge:** A rise above normal water level due to low atmospheric pressure associated with storms and the action of wind stress on the water surface.

**Sustainability and Climate Action Plan (S/CAP):** Palo Alto’s ambitious plan to reduce the city and community’s greenhouse gas emissions to meet climate protection goals and also consider broader issues of sustainability, such as sea level rise, land use and biological resources.

**Sustainability Implementation Plans (SIPS):** Specific actions needed to achieve S/CAP goals.

**Threat and Hazard Identification and Risk Assessment (THIRA):** A THIRA helps communities better understand the hazards from natural, technological, and human-caused threats that pose the greatest risk. The Palo Alto THIRA report is updated every two years.

**Vulnerability:** The extent to which a species, habitat, ecosystem, or human system is susceptible to harm from climate change impacts. More specifically, the degree to which a system is exposed to, susceptible to, and unable to cope with, the adverse effects of climate change, including climate variability and extremes. Vulnerability is a function of the character, magnitude, and rate of climate variation to which a system is exposed, as well as of non-climatic characteristics of the system, including its sensitivity, and its coping and adaptive capacity.

**Vulnerability Assessment:** A practice that identifies who and what is exposed and sensitive to change and how able a given system is to cope with extremes and change. It considers the factors that expose and
make people or the environment susceptible to harm and access to natural and financial resources available to cope and adapt, including the ability to self-protect, external coping mechanisms, support networks, and so on.