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## Climate Migration and Displacement: A Case Study of Puerto Rican Women in Connecticut

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# CONNECTICUT LAW REVIEW

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## Article

### Climate Migration and Displacement: A Case Study of Puerto Rican Women in Connecticut

CAMILA BUSTOS, BRUNI PIZARRO & TABITHA SOOKDEO

*The climate crisis is increasingly forcing people to flee their homes, whether internally or across state borders. However, existing international and domestic law does not provide sufficient protection for those forcibly displaced by extreme weather events. In 2021, the Biden administration issued an executive order and subsequently a report on the impact of climate change on migration, which marked a first step in federal policy toward recognition of the nexus between climate change and displacement. At the local level, Connecticut has already become a destination for climate-displaced people. For instance, after Hurricane Maria landed in Puerto Rico in 2017, approximately 13,000 Puerto Ricans came to the state. Since then, local service organizations have led efforts to help the community relocate after the disaster. Nearly six years after Maria, this Article provides the first ethnography of Puerto Rican women who relocated in Connecticut in the aftermath of the hurricane, discussing the ways in which federal law and policy have failed to meet the needs of Puerto Ricans and other climate-displaced people.*

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# Climate Migration and Displacement: A Case Study of Puerto Rican Women in Connecticut

CAMILA BUSTOS,\* BRUNI PIZARRO \*\* & TABITHA SOOKDEO \*\*\*

## INTRODUCTION

This article provides the first ethnography of Puerto Rican women who relocated to Connecticut in the aftermath of Hurricane Maria, discussing the ways in which federal law and policy have failed to meet the needs of Puerto Ricans and other climate-displaced people. Part I introduces the phenomenon of climate change displacement, discussing current projections, the multicausal nature of displacement, and some of the underlying complexities around this phenomenon. Part II analyzes some of the gaps in protection stemming from both domestic and international law, devoting particular attention to the ways in which existing law and policy have failed to provide real protections to climate-displaced people. Part III discusses recent developments in U.S. federal policy on climate displacement. Part IV offers an in-depth study of displaced Puerto Rican women in New Haven, Connecticut, developed through six months of ethnographic fieldwork, cultural analysis, and oral histories of women who left the island after Hurricane Maria. Part V offers recommendations for policy makers working on displacement, relocation, and local resilience.

## I. CLIMATE CHANGE MOBILITY

The scale of the challenges arising from climate displacement is often communicated through the shocking statistics produced by leading authorities on the subject. For instance, the Internal Displacement Monitoring Centre (IDMC) estimates that over the past decade alone, disasters, of which weather-related events made up ninety-four percent in 2021, triggered an average of 23 million new displacements annually, more than twice as many as displacements caused by conflict and violence.<sup>1</sup>

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\* Assistant Professor at the Elisabeth Haub School of Law at Pace University. Thank you to my co-authors for always inspiring me with their empathy, tenacity, and sense of humor. Thank you to the staff at the *Connecticut Law Review* for their helpful comments and edits.

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<sup>1</sup> Internal Displacement Monitoring Ctr. [IDMC], *Global Report on Internal Displacement 2022*, at 12 fig.2, 16 (2022) [hereinafter *GRID 2022*], [https://www.internal-displacement.org/sites/default/files/publications/documents/IDMC\\_GRID\\_2022\\_LR.pdf](https://www.internal-displacement.org/sites/default/files/publications/documents/IDMC_GRID_2022_LR.pdf) (charting totals of 230 million internal

In terms of future projections, one World Bank study estimates that by 2050 there could be more than 216 million people internally displaced by slow-onset disasters, with 143 million from just three regions—Latin America, sub-Saharan Africa, and South Asia.<sup>2</sup> Another study projects that one billion people worldwide are at risk of displacement caused by disasters by 2050.<sup>3</sup> The different projections produced by international agencies and think tanks demonstrate that there is no consensus on the appropriate terminology to describe climate displacement or on a methodology to assess the scale and global projections of this phenomenon. Yet one thing remains clear for scholars, practitioners, and communities across the world: despite the absence of a conclusive figure of how many people will be forced to move because of climate-related and environmental events, climate change is increasingly forcing individuals across the world to leave their homes.

Climate displacement is a complex phenomenon, which is precisely why its contours have been so challenging for lawyers to understand. Displacement may result from slow- or sudden-onset events. The former refers to events of slow progression, such as environmental degradation or drought.<sup>4</sup> The latter includes events that may force communities to leave immediately after a disaster, such as a hurricane or landslide.<sup>5</sup>

Migration scholars have long documented how climate change exacerbates an individual's or a community's underlying vulnerability and does not necessarily *cause* displacement.<sup>6</sup> Instead, environmental or climate-related events tend to exacerbate poverty, housing insecurity, and economic inequality, compounding existing harms for people living at the margins of society.<sup>7</sup> Low-income and BIPOC (Black, indigenous, and people of color) communities are more likely to be negatively impacted by

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displacements by disasters and 98.6 million by conflict and violence from 2012 to 2021); *see also* *Frequently Asked Questions on Climate Change and Disaster Displacement*, UNHRC (Nov. 6, 2016), <https://www.unhcr.org/uk/news/latest/2016/11/581f52dc4/frequently-asked-questions-climate-change-disaster-displacement.html> (“An annual average of 21.5 million people have been forcibly displaced by weather-related sudden onset hazards—such as floods, storms, wildfires, extreme temperature—each year since 2008.”).

<sup>2</sup> Viviane Clement et al., World Bank Grp. [WBG], *Groundswell Part 2: Acting on Internal Climate Migration*, at 80, 83 tbl.6 (2021), <https://openknowledge.worldbank.org/bitstreams/158b2f56-a4db-5a2d-93b9-0070068fa084/download>.

<sup>3</sup> Institute for Economics & Peace [IEP], *Ecological Threat Register 2020: Understanding Ecological Threats, Resilience and Peace*, at 8–9 (2020), [https://www.economicsandpeace.org/wp-content/uploads/2020/09/ETR\\_2020\\_web-1.pdf](https://www.economicsandpeace.org/wp-content/uploads/2020/09/ETR_2020_web-1.pdf).

<sup>4</sup> *Disaster*, U.N. OFF. FOR DISASTER RISK REDUCTION, <https://www.undrr.org/terminology/disaster> (last visited Feb. 8, 2023).

<sup>5</sup> *Id.*

<sup>6</sup> Oli Brown, Int'l Org. for Migration [IOM], *Migration and Climate Change*, at 12, IOM Migration Rsch. Ser. No. 31 (2008), [https://publications.iom.int/es/system/files/pdf/mrs-31\\_en.pdf](https://publications.iom.int/es/system/files/pdf/mrs-31_en.pdf).

<sup>7</sup> *Id.* at 41.

environmental or climate disasters.<sup>8</sup> That said, the decision to migrate is often multilayered and thus is rarely the direct result of an extreme weather event alone.<sup>9</sup>

Legal scholars have devoted significant attention to the proper legal term to refer to people displaced by climate change. Because how we define the challenge before us often shapes the way we attempt to solve it, legal scholarship has delved into the most pertinent terminology: “environmental refugee,” “climate-displaced person,” “climate migrant,” or “environmental migrant,” among others.<sup>10</sup>

The existing international legal framework does not contemplate special protection for climate-displaced people nor recognize climate displacement.<sup>11</sup> International law scholars have focused on the need to reform international law to accommodate the increasing reality of climate change and climate-related impacts on migration, discussing the implications of climate on international law,<sup>12</sup> the refugee framework,<sup>13</sup> and the development of new treaties or legal instruments to protect climate-displaced people.<sup>14</sup> Many of the proposals have focused on existing

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<sup>8</sup> Aneesh Patnaik et al., *Racial Disparities and Climate Change*, PRINCETON STUDENT CLIMATE INITIATIVE (Aug. 15, 2020), <https://psci.princeton.edu/tips/2020/8/15/racial-disparities-and-climate-change>. See generally D. Kapua’ala Sproat, *An Indigenous People’s Right to Environmental Self-Determination: Native Hawaiians and the Struggle Against Climate Change Devastation*, 35 STAN. ENV’T L.J. 157 (2016).

<sup>9</sup> Sproat, *supra* note 8, at 164–65.

<sup>10</sup> CAMILLO BOANO ET AL., REFUGEE STUD. CTR., FORCED MIGRATION POL’Y BRIEFINGS 1, ENVIRONMENTALLY DISPLACED PEOPLE: UNDERSTANDING THE LINKAGES BETWEEN ENVIRONMENTAL CHANGE, LIVELIHOODS AND FORCED MIGRATION 7–8 (2008), <https://www.rsc.ox.ac.uk/files/files-1/pb1-environmentally-displaced-people-2008.pdf>; Dimitra Manou & Anja Mihr, *Climate Change, Migration, and Human Rights*, in CLIMATE CHANGE, MIGRATION, AND HUMAN RIGHTS: LAW AND POLICY PERSPECTIVES 3, 5 (Dimitra Manou et al. eds., 2017).

<sup>11</sup> WHITE HOUSE, REPORT ON THE IMPACT OF CLIMATE CHANGE ON MIGRATION 17 (2021), <https://www.whitehouse.gov/wp-content/uploads/2021/10/Report-on-the-Impact-of-Climate-Change-on-Migration.pdf>.

<sup>12</sup> See, e.g., Sumudu Atapattu, *Climate Change, Human Rights, and Forced Migration: Implications for International Law*, 27 WIS. INT’L L.J. 607 (2009); Rebecca Dowd & Jane McAdam, *International Cooperation and Responsibility Sharing to Combat Climate Change: Lessons for International Refugee Law*, 18 MELB. J. INT’L L. 180 (2017); Bonnie Docherty & Tyler Giannini, *Confronting a Rising Tide: A Proposal for a Convention on Climate Change Refugees*, 33 HARV. ENV’T L. REV. 349 (2009); Katrina Miriam Wyman, *Responses to Climate Migration*, 37 HARV. ENV’T L. REV. 167 (2013).

<sup>13</sup> See, e.g., Heather Alexander & Jonathan Simon, “Unable to Return” in the 1951 Refugee Convention: Stateless Refugees and Climate Change, 26 FLA. J. INT’L L. 531 (2014); Brittan J. Bush, *Redefining Environmental Refugees*, 27 GEO. IMMIGR. L.J. 553 (2013).

<sup>14</sup> See, e.g., Benoit Mayer, *Migration in the UNFCCC Workstream on Loss and Damage: An Assessment of Alternative Framings and Conceivable Responses*, 6 TRANSNAT’L ENV’T L. 107 (2017); Michel Prieur, *Draft Convention on the International Status of Environmentally-Displaced Persons*, 43 URB. LAW. 247 (2011); Benoit Mayer, *The International Legal Challenges of Climate-Induced Migration: Proposal for an International Legal Framework*, 22 COLO. J. INT’L ENV’T L. & POL’Y 357 (2011); Jane McAdam, *Swimming Against the Tide: Why a Climate Change Displacement Treaty is Not the Answer*, 23 INT’L J. REFUGEE L. 2 (2011); Elizabeth Ferris, *Climate Change, Migration, Law and Global Governance*, 44 N.C. J. INT’L L. 425 (2019); Barbara McIsaac, *Domestic Evolution: Amending*

gaps and the need to protect individuals who are forced to leave their homes,<sup>15</sup> particularly across populations in small-island states and indigenous peoples.<sup>16</sup>

To a lesser extent, the literature has looked at the human rights obligations of states in the context of internal displacement<sup>17</sup> and planned relocation after a disaster.<sup>18</sup> While the gaps across domestic law are outside this article's scope, it is notable that many countries do not have any robust protection frameworks for those displaced by extreme weather events or climate change.<sup>19</sup>

Much of the literature and media coverage on climate displacement frames the issue through a racialized lens, meaning through the perspective of Global North nationals concerned with "unprecedented increases in cross-border migration" originating from the Global South.<sup>20</sup> However, as Carmen Gonzales explains:

This specter of mass migration from South to North is inconsistent with documented patterns of displacement during the current refugee crisis. Of the 68.5 million individuals forcibly displaced worldwide in 2017, the majority—40 million—remain within their country of origin. When they do

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*the United States Refugee Definition of the INA to Include Environmentally Displaced Refugees*, 9 U. MIA. RACE & SOC. JUST. L. REV. 45 (2019).

<sup>15</sup> See e.g., Maxine Burkett, *Behind the Veil: Climate Migration, Regime Shift, and a New Theory of Justice*, 53 HARV. C.R.-C.L. L. REV. 445 (2018); Jennifer Skinner, Comment, *The State Responsibility in the Face of Environmentally Displaced Persons*, 4 WAKE FOREST J.L. & POL'Y 417 (2014); Alice Thomas, *Protecting People Displaced by Weather-Related Disasters and Climate Change: Experience from the Field*, 15 VT. J. ENV'T L. 803 (2014); Julia Toscano, *Climate Change Displacement and Forced Migration: An International Crisis*, 6 ARIZ. J. ENV'T L. & POL'Y 457 (2015); Adam Crepelle, *The United States First Climate Relocation: Recognition, Relocation, and Indigenous Rights at the Isle de Jean Charles*, 6 BELMONT L. REV. 1 (2018).

<sup>16</sup> See, e.g., Bobby Yu, Comment, *The Sinking Nation of Kiribati: The Lonely Stand Against Statelessness and Displacement from Rising Oceans*, 3 ARIZ. J. ENV'T L. & POL'Y (2013); Sumudu Atapattu, *Climate Change: Disappearing States, Migration, and Challenges for International Law*, 4 WASH. J. ENV'T L. & POL'Y 1 (2014); Harriet Farquhar, Note, "Migration with Dignity": Towards a New Zealand Response to Climate Change Displacement in the Pacific, 46 VICT. U. WELLINGTON L. REV. 29 (2015).

<sup>17</sup> See e.g., Sebastián Albuja & Isabel Cavelier Adarve, *Protecting People Displaced by Disasters in the Context of Climate Change: Challenges from a Mixed Conflict/Disaster Context*, 24 TUL. ENV'T L.J. 239 (2011).

<sup>18</sup> See, e.g., Jane McAdam & Elizabeth Ferris, *Planned Relocations in the Context of Climate Change: Unpacking the Legal and Conceptual Issues*, 4 CAMBRIDGE J. INT'L & COMPAR. L. 137 (2015).

<sup>19</sup> *Id.* at 161.

<sup>20</sup> Carmen G. Gonzalez, *Climate Justice and Climate Displacement: Evaluating the Emerging Legal and Policy Responses*, 36 WIS. INT'L L.J. 366, 366–68 (2019) [hereinafter Gonzalez, *Climate Justice*]; see also Carmen G. Gonzalez, *Migration as Reparation: Climate Change and the Disruption of Borders*, 66 LOY. L. REV. 401, 403 (2020). *But cf.* PAC. ISLANDS STUDENTS FIGHTING CLIMATE CHANGE ET AL., HOW TO COMMUNICATE ABOUT CLIMATE LINKED MOBILITY 4, (2022), available at <https://drive.google.com/file/d/1H755rIfYaj3AoY3zU9m0U75K18IDA5cA> (advising against using "crisis language," including phrases like "unprecedented migration," that "feed into the threat narrative").

cross borders, most refugees wind up in neighboring countries in the Global South, which currently host 85 percent of the world's refugees. Only a relatively small, albeit increasing proportion of refugees worldwide have managed to come to the Global North, mostly to Germany, France, Italy, Sweden, and the United States. In the Global South, Turkey currently hosts the largest number of refugees, followed by Pakistan, Uganda, Lebanon, Iran, Bangladesh, and Sudan.<sup>21</sup>

Furthermore, wealthy nations have not been immune to the destructive impacts of climate change. Recent summers have been replete with examples of extreme weather events such as droughts, heat waves, and flooding, all of which have severely impacted communities across Western Europe and the United States.<sup>22</sup>

An additional note to consider is that migration (which denotes a voluntary decision to relocate) or displacement (which refers to forced movement in response to an external stressor) can be temporary or permanent, depending on a range of factors shaping the decision of an individual to leave their home (e.g., scale of the disaster; economic opportunities in the place of origin versus the place of destinations; strength of social ties in a particular location).<sup>23</sup> Furthermore, as described above, most climate-related displacement will occur domestically as opposed to across international borders,<sup>24</sup> with many of those displaced moving to urban areas.<sup>25</sup> According to the IDMC, climate-related and other environmental disasters triggered three times more internal displacements than conflict in 2020,<sup>26</sup> and such disasters have forcibly displaced more people than conflict within their own countries since at least 2011.<sup>27</sup>

In the United States alone, there have already been several examples of forced movement in the context of wildfires, hurricanes, and other extreme weather events. For example, in 2019, the severity of the wildfires in

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<sup>21</sup> Gonzalez, *Climate Justice*, *supra* note 20, at 380 (internal quotation marks and footnotes omitted).

<sup>22</sup> *GRID 2022*, *supra* note 1, at 75–76, 83–84, 87–88.

<sup>23</sup> EROL YAYBOKE ET AL., CTR. FOR STRATEGIC & INT'L STUD., A NEW FRAMEWORK FOR U.S. LEADERSHIP ON CLIMATE MIGRATION 2–6 (2020), [https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/201022\\_Yayboke\\_ClimateMigration\\_Brief\\_0.pdf](https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/201022_Yayboke_ClimateMigration_Brief_0.pdf).

<sup>24</sup> AMA RUTH FRANCIS, SABIN CTR. FOR CLIMATE CHANGE L., GLOBAL GOVERNANCE OF ENVIRONMENTAL MOBILITY: LATIN AMERICA & THE CARIBBEAN 21 (2021), [https://scholarship.law.columbia.edu/sabin\\_climate\\_change/36/](https://scholarship.law.columbia.edu/sabin_climate_change/36/).

<sup>25</sup> *Why Cities Must Prepare for Climate Migration*, C40 KNOWLEDGE (Mar. 2022), <https://www.c40knowledgehub.org/s/article/Why-cities-must-prepare-for-climate-migration>.

<sup>26</sup> Internal Displacement Monitoring Centre [IDMC], *Global Report on Internal Displacement 2021*, at 3 (2021), [https://www.internal-displacement.org/sites/default/files/publications/documents/grid2021\\_idmc.pdf](https://www.internal-displacement.org/sites/default/files/publications/documents/grid2021_idmc.pdf).

<sup>27</sup> *Id.* at 7 fig.2.



California displaced 100,000 people across the state.<sup>28</sup> Many of them lost their homes permanently. In 2005, Hurricane Katrina—the poster child for both racism in the U.S. climate displacement context and significant failures in disaster relief efforts<sup>29</sup>—displaced more than one million people.<sup>30</sup> The devastation brought by Hurricane Katrina demonstrated “the ways that pre-existing injustices (including poverty, segregation, and substandard housing) magnify the impacts of storms and flooding, which will only grow worse with climate change.”<sup>31</sup>

## II. INTERNATIONAL AND DOMESTIC GAPS IN PROTECTION

Climate-displaced individuals are currently using a number of mechanisms to move across borders, although these mechanisms remain insufficient to offer protection in the long term.<sup>32</sup> In practice, people fleeing disasters may at times obtain some form of humanitarian relief in the aftermath of an environmental disaster. In some cases, climate-displaced people may qualify for temporary relief under the Temporary Protected Status (TPS) in the United States, which has historically been used in the aftermath of environmental disasters.<sup>33</sup> In other contexts, receiving countries may extend other forms of temporary protection such as humanitarian visas or private sponsorship programs. For example, Argentina has created a humanitarian program for climate-displaced people coming from Central America and Caribbean countries who meet certain eligibility criteria.<sup>34</sup>

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<sup>28</sup> Abrahm Lustgarten, *Climate Change Will Force a New American Migration*, PROPUBLICA (Sept. 15, 2020, 5:00 AM), <https://www.propublica.org/article/climate-change-will-force-a-new-american-migration>.

<sup>29</sup> Jane McAdam, *As Biden Seeks Answers on Climate’s Impact on Migration, Sydney Declaration Provides Legal Ground Rules for Action*, JUST SEC. (Feb. 19, 2021), <https://www.justsecurity.org/74802/as-biden-seeks-answers-on-climates-impact-on-migration-sydney-declaration-provides-legal-ground-rules-for-action/>.

<sup>30</sup> Allison Plyer, *Facts for Features: Katrina Impact*, DATA CTR. (Aug. 26, 2016), <https://www.datacenterresearch.org/data-resources/katrina/facts-for-impact/>.

<sup>31</sup> Gonzalez, *Climate Justice*, *supra* note 20, at 371.

<sup>32</sup> See Carey DeGenaro, Comment, *Looking Inward: Domestic Policy for Climate Change Refugees in the United States and Beyond*, 86 U. COLO. L. REV. 991, 992–96 (2015) (explaining why current processes are insufficient and proposing new legislation to fill the gaps); see also INT’L REFUGEE ASSISTANCE PROJECT, ADVOCACY MEMO ON CLIMATE DISPLACEMENT: KEY LEGAL LEVERS 2 (2022), <https://refugeerights.org/wp-content/uploads/2022/11/Climate-Displacement-Advocacy-Memo-Nov-2022.pdf>.

<sup>33</sup> Bill Frelick, *What’s Wrong with Temporary Protected Status and How to Fix It: Exploring a Complementary Protection Regime*, 8 J. ON MIGRATION & HUM. SEC. 42, 42–43 (2020) (“The TPS statute authorized the attorney general to designate foreign countries for TPS based on armed conflict, environmental disasters, and other extraordinary and temporary conditions that prevent designated nationals from returning in safety.”).

<sup>34</sup> Disposition No. 891/2022, May 19, 2022. [34.923] B.O. 63 (Arg.). The program requires civil society organizations to sponsor eligible applicants. As of the writing of this Article, the private sponsorship program has not yet been implemented.

Although the international refugee framework was not designed to protect climate-displaced people, it certainly offers the possibility of protection for those individuals who can demonstrate that they meet the eligibility requirements under the law. For instance, environmental defenders who can show that they were persecuted on account of a protected identity may apply for asylum.<sup>35</sup> The UNHRC has issued special guidance in the climate displacement context,<sup>36</sup> but the scale and complexity of the challenge make it very difficult for the existing framework—which offers narrow protection—to adequately address the needs of climate-displaced people.

In the United States context, climate-displaced people may fall under distinct categories depending on their nationality, status at the time of the disaster, and the specific facts surrounding their displacement. First, there are individuals displaced by environmental or climate-related events who may qualify for legal protection under the asylum framework. These individuals may be granted asylum or refugee status if they can demonstrate they suffered persecution on account of a protected ground such as race, nationality, religion, political opinion, or particular social group (PSG).<sup>37</sup> Indeed, the Biden administration has acknowledged that “[t]here is an interplay between climate change and various aspects of eligibility for refugee status.”<sup>38</sup>

Second, individuals displaced by climate change may have a special status that allows them to enter the country. For instance, Puerto Ricans affected by environmental disasters such as Hurricane Maria in 2017 are U.S. citizens and therefore do not face the same legal obstacles in terms of immigration status as noncitizens displaced by climate change.<sup>39</sup> This is also the case for a majority of U.S. territories except for American Samoa.<sup>40</sup>

Third, the remaining category of climate-displaced people may qualify for other forms of protection beyond asylum or refugee status and do not have a special status that allows them to enter the United States with relative ease as nationals of most U.S. territories. They may qualify for other forms

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<sup>35</sup> U.N. High Comm’r for Refugees [UNHCR], *Legal Considerations Regarding Claims for International Protection Made in the Context of the Adverse Effects of Climate Change and Disasters* ¶¶ 7–9 (2020), <https://www.refworld.org/docid/5f75f2734.html>.

<sup>36</sup> *Id.* ¶ 5.

<sup>37</sup> WHITE HOUSE, *supra* note 11, at 17.

<sup>38</sup> *Id.*

<sup>39</sup> See 8 U.S.C. § 1402 (governing U.S. citizenship for Puerto Ricans); Eliza Pan, *Reimagining the Climate Migration Paradigm: Bridging Conceptual Barriers to Climate Migration Responses*, 50 ENV’T L. 1173, 1201 (2020) (“While climate migrants exercise their agency in choosing whether, where, and how to migrate, those choices are constrained by their citizenships and other factors not exclusively within their control.”).

<sup>40</sup> *American Samoa*, U.S. DEP’T INTERIOR, <https://www.doi.gov/oia/islands/american-samoa> (last visited Feb. 6, 2023) (“Unlike citizens of other U.S. territories who are U.S. citizens, American Samoans are U.S. nationals.”).

of humanitarian protection such as humanitarian parole or TPS.<sup>41</sup> Those not eligible for asylum or refugee status may be able to request protection under the Convention Against Torture or statutory withholding of removal.<sup>42</sup> However, those unable to leverage a mechanism that offers legal entry and at least short-term protection will remain undocumented and therefore less likely to access a work permit and essential social services.<sup>43</sup>

### III. PROTECTING CLIMATE-DISPLACED PEOPLE IN THE U.S. CONTEXT

In 2021, the Biden administration announced an executive order on climate change and migration that requested that the Assistant to the President for National Security Affairs (APNSA) “prepare and submit to the President a report on climate change and its impact on migration, including forced migration, internal displacement, and planned relocation.”<sup>44</sup> The report, published in October 2021,<sup>45</sup> was the first time an administration officially recognized the link between climate change and migration.<sup>46</sup>

One of the report’s key recommendations was the creation of a standing interagency policy process on the impacts of climate change on migration “to coordinate U.S. government efforts to mitigate and respond to migration resulting from the impacts of climate change that brings together representatives across the scientific, development, humanitarian, democracy and human rights, and peace and security elements of the U.S. Government.”<sup>47</sup>

As of the writing of this Article, there is no publicly available information on the status of the interagency working group or its members, timeline, and objectives. There are also no precedential decisions by the Board of Immigration Appeals or federal courts on the interplay between asylum and refugee law and climate displacement. However, a number of advocacy organizations have increasingly prioritized climate displacement on their agendas and pushed the Biden administration to address the gap in protection for climate-displaced people. For instance, Refugees International coordinated a “Task Force Report to the President on the Climate Crisis and Global Migration,” which sought to inform the White

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<sup>41</sup> See *Temporary Protected Status*, U.S. CITIZENSHIP & IMMIGR. SERVS., <https://www.uscis.gov/humanitarian/temporary-protected-status> (Mar. 13, 2023); *Humanitarian Parole*, U.S. CITIZENSHIP & IMMIGR. SERVS., <https://www.uscis.gov/forms/explore-my-options/humanitarian-parole> (Nov. 12, 2021).

<sup>42</sup> U.N. Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, *opened for signature* Dec. 10, 1984, S. TREATY DOC. No. 100-20, 1465 U.N.T.S. 113 (entered into force June 26, 1987).

<sup>43</sup> See 8 U.S.C. § 1611 (prohibiting nonqualifying immigrants from enrolling in “federal public benefit programs”).

<sup>44</sup> Exec. Order No. 14,013, 86 Fed. Reg. 8839 (Feb. 4, 2021).

<sup>45</sup> WHITE HOUSE, *supra* note 11.

<sup>46</sup> See *Fact Sheet: Prioritizing Climate in Foreign Policy and National Security*, WHITE HOUSE (Oct. 21, 2021), <https://www.whitehouse.gov/briefing-room/statements-releases/2021/10/21/fact-sheet-prioritizing-climate-in-foreign-policy-and-national-security>.

<sup>47</sup> WHITE HOUSE, *supra* note 11, at 30.

House Report.<sup>48</sup> In addition, several organizations have advocated for the administration to prioritize climate-impacted populations for resettlement.<sup>49</sup> However, beyond the 2021 executive order and subsequent report, there is still a long way before U.S. law and policy meaningfully protect climate-displaced people.

In light of this context, the next section will discuss an example of “internal” displacement by Puerto Ricans leaving the island in the aftermath of Hurricane Maria and traveling to the continental United States. Although this case is not a traditional example of cross-border migration or displacement given the political status of Puerto Rico, it does provide interesting features to understand the implications of climate displacement for the United States and individual states.

#### IV. PUERTO RICO AND HURRICANE MARIA

As the scholarly literature and practice on climate displacement evolves, it is essential to study this complex phenomenon through a particularized set of facts and case studies that provide analysis through a local perspective. This Article contributes to the literature by discussing the displacement of Puerto Ricans after Hurricane Maria in 2017 to Connecticut and analyzing the state’s response and lessons learned from the process.

Puerto Rico has often been called the world’s “oldest colony.”<sup>50</sup> The island’s unique relationship to the United States began with the U.S. invasion of Puerto Rico in 1898 during the Spanish-Cuban-American War. On July 25, 1898, the United States invaded Puerto Rico and seized the island from Spain, which had colonized it since 1493.<sup>51</sup> In 1901, the U.S. Supreme Court affirmed the status of Puerto Rico as “foreign to the United States in a domestic sense.”<sup>52</sup> In 1917, the United States granted Puerto Ricans U.S. citizenship through the Jones Act.<sup>53</sup> The archipelago became a U.S. commonwealth in 1952.<sup>54</sup> Since then, the status of Puerto Ricans as

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<sup>48</sup> REFUGEES INT’L, TASK FORCE REPORT TO THE PRESIDENT ON THE CLIMATE CRISIS AND GLOBAL MIGRATION: A PATHWAY TO PROTECTION FOR PEOPLE ON THE MOVE 1, 5 (2021), <https://www.refugeesinternational.org/reports/2021/7/12/task-force-report-to-the-president-on-the-climate-crisis-and-global-migration-a-pathway-to-protection-for-people-on-the-move>.

<sup>49</sup> Letter from Eric Schwartz, Interim President, Refugees Int’l, et al., to President Joseph R. Biden (Sept. 8, 2022), <https://www.refugeesinternational.org/reports/2022/9/8/letter-leaders-of-refugee-policy-organizations-call-on-biden-administration-to-prioritize-climate-impacted-populations-for-resettlement>.

<sup>50</sup> *E.g.*, JOSÉ TRÍAS MONGE, PUERTO RICO: THE TRIALS OF THE OLDEST COLONY IN THE WORLD 4 (1997).

<sup>51</sup> *Id.* at 5, 26.

<sup>52</sup> *Downes v. Bidwell*, 182 U.S. 244, 341 (1901) (White, J., concurring).

<sup>53</sup> Pub. L. No. 64-368, § 5, 39 Stat. 951, 953 (1917).

<sup>54</sup> Pub. L. No. 82-447, 66 Stat. 327 (1952) (ratifying the Cuban Constitution); Amelia Cheatham & Diana Roy, *Puerto Rico: A U.S. Territory in Crisis*, COUNCIL ON FOREIGN RELS. (Sept. 29, 2022, 11:40 AM), <https://on.cfr.org/39K9Hkf>.

second-class citizens has been thoroughly documented and discussed in the academic literature.<sup>55</sup>

The doctrine surrounding Puerto Rican citizenship established through the *Insular Cases* replicated the legal doctrine of “separate but equal” under *Plessy v. Ferguson*,<sup>56</sup> granting the federal government continued political and economic dominance over the archipelago.<sup>57</sup> The logic in these cases directly clashed with the U.S. Constitution, ran contrary to express positions of international treaties ratified by the United States, and violated the equality of all citizens before the law.<sup>58</sup> The question of Puerto Rican sovereignty and the island’s relationship with the United States remains ever present as issues surrounding citizenship and rights shape life in the island, disaster relief efforts, and ultimately the decision to flee after disaster.<sup>59</sup>

#### A. Puerto Rican Migration to the Continental U.S.

The first wave of migrants to the U.S. mainland coincided with Puerto Ricans obtaining U.S. citizenship in 1917. Most set their sights on New York City, a gateway city that by 1960 housed 600,000 Puerto Ricans by birth or parentage.<sup>60</sup> As new destinations emerged in cities in New Jersey, Florida, Massachusetts, and Connecticut, an alternative migration trajectory influenced the incorporation of Puerto Ricans to these urban environments.<sup>61</sup> Connecticut, in particular, has seen a large growth in the population of Puerto Ricans. According to the U.S. Census, 15,247 lived in Connecticut in 1960. Two decades later, the population increased to 88,361, and in 1990, 146,842 Puerto Ricans lived in the Constitution State.<sup>62</sup> Aside from Hartford and Waterbury, New Haven has the third-largest concentration of Puerto Ricans in Connecticut.<sup>63</sup>

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<sup>55</sup> See, e.g., JORGE DUANY, *THE PUERTO RICAN NATION ON THE MOVE: IDENTITIES ON THE ISLAND & IN THE UNITED STATES* 122–36 (2002); TRÍAS MONGE, *supra* note 50, at 177–96. See generally GUSTAVO A. GELPÍ, *THE CONSTITUTIONAL EVOLUTION OF PUERTO RICO AND OTHER U.S. TERRITORIES (1898–PRESENT)* (2017); RECONSIDERING THE INSULAR CASES: THE PAST AND FUTURE OF THE AMERICAN EMPIRE (Gerald L. Neuman & Tomiko Brown-Nagin eds., 2015).

<sup>56</sup> *Plessy v. Ferguson*, 163 U.S. 537, 551–52 (1896); Juan R. Torruella, *Ruling America’s Colonies: The Insular Cases*, 32 *YALE L. & POL’Y REV.* 57, 68 (2013).

<sup>57</sup> Torruella, *supra* note 56, at 81–82.

<sup>58</sup> *Id.* at 92–93.

<sup>59</sup> Camila Bustos, Note, *The Third Space of Puerto Rican Sovereignty: Reimagining Self-Determination Beyond State Sovereignty*, 32 *YALE J.L. & FEMINISM* 73, 80–81, 84–85 (2020).

<sup>60</sup> RUTH GLASSER, *AQUÍ ME QUEDO: PUERTO RICANS IN CONNECTICUT* 9 (José E. Rodríguez Sellas et al. trans., 1997) (citing FELIX M. PADILLA, *PUERTO RICAN CHICAGO* 56–57 (1987)).

<sup>61</sup> GLASSER, *supra* note 60, at 11.

<sup>62</sup> *Id.*

<sup>63</sup> *QuickFacts*, U.S. CENSUS BUREAU <https://www.census.gov/quickfacts/fact/table/newhavencyconnecticut,waterburycityconnecticut,hartfordcityconnecticut,CT/HCN010217> (last visited Apr. 14, 2023) (drawing on generalized race and Hispanic origin data collected during the 2020 Census that groups Hispanic and Latinx respondents in a singular category).

The various migration waves of Puerto Ricans to Connecticut have been characterized by the temporality of political and economic transnational changes that influenced the cultural fabric of the diaspora. In Ruth Glasser's 1997 book, *Aquí Me Quedo*, a collection of oral histories depicts the Puerto Rican experience through the lens of migration.<sup>64</sup> Glasser interviewed Julio Morales, a Connecticut resident who arrived during an earlier wave of migration, and his account illuminates the nuances of migratory experience and incorporation:

[W]e have somebody like myself who has been living in the United States for forty-five years, and Puerto Ricans who will come here tomorrow for the very first time, so that we have Puerto Ricans at very different stages. Some of us speak only English, some of us speak only Spanish, some of us speak both and feel very comfortable in that. So that there's a difference in terms of how we have experienced, or are experiencing Connecticut.<sup>65</sup>

Morales arrived in Connecticut during the post-World War II period.<sup>66</sup> This heavy outmigration of Puerto Ricans to the mainland coincided with Operation Bootstrap, a series of U.S.-led projects that transitioned the Puerto Rican economy from agriculture to manufacturing and resulted in displacement, high unemployment, and mass migrations to the U.S. mainland.<sup>67</sup> The development program failed to provide the promised jobs and resulted in huge land grabs in the name of "industrialization" that displaced farmers and campesinos.<sup>68</sup> Operation Bootstrap dismantled the agricultural sector in Puerto Rico, drastically reducing agricultural labor by seventy-eight percent between 1940 and 1979.<sup>69</sup>

The disintegration of agricultural livelihoods was not new to Puerto Rico. In the aftermath of the Spanish-Cuban-American War of 1898, Puerto Rico became a possession of the United States and new tariff laws went into effect that placed burdens on small coffee farmers and limited their ability to compete on a global scale.<sup>70</sup> The advent of Hurricane San Ciriaco in 1899 destroyed coffee yields and further increased precarity for farmers.<sup>71</sup> With the expansion of the "huge" U.S.-controlled sugar industry in Puerto Rico during the first half of the twentieth century, a large number of smallholder

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<sup>64</sup> See generally GLASSER, *supra* note 60.

<sup>65</sup> *Id.* at 7.

<sup>66</sup> See *id.* at 41.

<sup>67</sup> *Id.* at 45.

<sup>68</sup> *Id.*

<sup>69</sup> *Id.* at 45 (citing Felipe Rivera, *The Puerto Rican Farmworker: From Exploitation to Unionization*, in LABOR MIGRATION UNDER CAPITALISM: THE PUERTO RICAN EXPERIENCE 239, 245 (1979).

<sup>70</sup> *Id.* at 43.

<sup>71</sup> Stuart B. Schwartz, *The Hurricane of San Ciriaco: Disaster, Politics, and Society in Puerto Rico, 1899–1901*, 72 HISP. AM. HIST. REV. 303, 304 (1992).

farmers lost their land to sugar corporations.<sup>72</sup> Farmers displaced by these events flooded Puerto Rican cities looking for work.<sup>73</sup> For the Puerto Rican government, outmigration became a solution to ease unemployment.<sup>74</sup> Regional employment offices had advertisements that read, “Farmworkers, as many as we can find.”<sup>75</sup>

The dire economic situation for many on the archipelago gave Puerto Ricans no choice but to work on the mainland in undesirable, poorly paid jobs. With the advent of industrialization in the post–World War II era in American cities, most of the U.S. citizenry worked in higher-paying, unionized factory jobs.<sup>76</sup> Agricultural employers found it difficult to recruit farm workers, as employment was often seasonal, physically demanding, and not protected by collective bargaining.<sup>77</sup> In Glasser’s interview with Nestor Morales, he recalled getting on a plane to an undisclosed destination: “It could be Florida, it could be Chicago, it could be New Jersey. I wound up in Connecticut. . . . [W]e didn’t care where they sent us to. We just wanted to work.”<sup>78</sup> Tens of thousands of Puerto Rican farmers worked on Connecticut tobacco farms, planted trees, harvested other crops, and instantiated a historical contribution to the state’s agricultural sector and accumulation of wealth.<sup>79</sup>

As Puerto Ricans migrated to Connecticut to work on farms, many shifted their gaze to urban centers to find alternative employment.<sup>80</sup> The new wave of migrants settled in neighborhoods such as Fair Haven, an ethnic enclave of first-wave Italian immigrants in New Haven.<sup>81</sup>

Italian immigration in New Haven coincided with the period of “urbanism” (1890 through the early 1920s), a term coined by Douglas Rae representing the peak of industrialization and economic growth in U.S. cities.<sup>82</sup> The first-wave Italian immigrants benefited from urbanist development, but an influx of Puerto Rican migrants in the 1960s to American cities did not fare as well.<sup>83</sup> In a fifty-year period (from 1950 through 2000), New Haven saw a steep decline in economic growth with the

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<sup>72</sup> GLASSER, *supra* note 60, at 43.

<sup>73</sup> Schwartz, *supra* note 71, at 315.

<sup>74</sup> GLASSER, *supra* note 60, at 47.

<sup>75</sup> *Id.* at 41.

<sup>76</sup> *Id.* at 47.

<sup>77</sup> *Id.*

<sup>78</sup> *Id.* at 41.

<sup>79</sup> *Id.* at 43.

<sup>80</sup> Jacqueline Olvera & Douglas Rae, *Post-Urbanism, Incorporation, and Migration*, 49 INT’L MIGRATION 23, 29 (2011).

<sup>81</sup> *Id.* at 30.

<sup>82</sup> *Id.* at 23, 25–27 (citing DOUGLAS W. RAE, CITY: URBANISM AND ITS END (2003)).

<sup>83</sup> *Id.* at 27, 29.

dissolution of seventy-five percent of the manufacturing sector and ninety percent of factory jobs.<sup>84</sup>

The “post-urban” migration<sup>85</sup> of Puerto Ricans to New Haven greatly influenced the incorporation of these new arrivals to an economically deprived social and political landscape. Limited economic opportunities impeded mobility, as migrants were underemployed and lived in derelict housing left behind by the former working-class Italian enclave.<sup>86</sup> Although prospects of actualizing the American Dream drove millions of Puerto Ricans to the mainland, many found themselves in unfamiliar and oppressive environments where poverty, violence, discrimination, and residential racial segregation influenced both socioeconomic and social disadvantage.<sup>87</sup> Puerto Ricans were excluded from employment in the civil service and private sector, including Yale-New Haven Hospital, one of the largest employers in New Haven.<sup>88</sup> To help alleviate the economic and social burdens faced by the Latinx community, a group of Puerto Rican community organizers founded Junta for Progressive Action, Inc., in 1969 as a nonprofit organization that embraces a “multisector dynamic” to serve the needs of New Haven residents.<sup>89</sup>

Junta was born out of community organizing and movement-building against injustices in the civil rights era.<sup>90</sup> The organization was founded on shared values and experiences of working-class Puerto Rican organizers who sought to mitigate the impact of social neglect and solve social problems in their own community.<sup>91</sup> Upon moving to the mainland, Puerto Ricans had to navigate unfamiliar and oppressive environments. Darker-skinned Puerto Ricans, in particular, were excluded from employment, education, and housing.<sup>92</sup> The duality of being Black and Puerto Rican and the racialized exclusion is multilayered and has a complex colonial past.<sup>93</sup>

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<sup>84</sup> *Id.* at 26.

<sup>85</sup> *Id.* at 24.

<sup>86</sup> *Id.* at 29–30, 30 tbl.2.

<sup>87</sup> *See id.* at 24, 30, 31 tbl.3 (discussing the disadvantages Puerto Rican migrants face). *See generally* Milenna Smith, *The Search for the American Dream: Interpersonal, Cultural, and Structural Constraints on Immigrants*, 14 SILICON VALLEY NOTEBOOK 98, 98–99, 101–04 (2016) (discussing factors such as racism which make it difficult for immigrants to achieve the American Dream).

<sup>88</sup> Olvera & Rae, *supra* note 80, at 30.

<sup>89</sup> Interview with Daniel Reyes, former Exec. Dir., Junta, in New Haven, Conn. (Mar. 10, 2019). Reyes refers to a “multisector” approach to address disparities by shifting away from “helping” to an ethos where there is meaningful investment in strengthening and elevating community. He stated, “My well-being is connected to yours. We all have a vested interest that all of us rise. It’s not just about helping.” *Id.*

<sup>90</sup> Interview with Alicia Caraballo, former Interim Exec. Dir. and daughter of founder Pura Delgado, Junta, in New Haven, Conn. (June 19, 2018).

<sup>91</sup> *Id.*

<sup>92</sup> *Id.*

<sup>93</sup> For an extended discussion on Blackness, colonialism, and Puerto Rican identity, see ILEANA M. RODRÍGUEZ-SILVA, *SILENCING RACE: DISENTANGLING BLACKNESS, COLONIALISM, AND NATIONAL IDENTITIES IN PUERTO RICO* (2012).



## B. Hurricane Maria Devastates Puerto Rico

On September 20, 2017, Puerto Rico was hit by a Category 4 hurricane that leveled its verdant landscape and destroyed homes in its wake.<sup>94</sup> Images of the disaster flooded media outlets, as the world watched 155 mph winds forcefully sweep through communities in plain sight.<sup>95</sup> When Hurricane Maria landed, the island's infrastructure had not received any meaningful investments, and its economy was in crisis, partly as a result of a U.S.-imposed debt restructuring plan.<sup>96</sup> The storm itself was the third costliest storm in U.S. history.<sup>97</sup> Approximately 300,000 homes were damaged or destroyed, costing approximately \$100 billion.<sup>98</sup> Media portrayals of Puerto Ricans slouched over, sitting helplessly in the rubble surrounded by their neighbors' blue-tarped roofs—relics of homes that once stood—paint a grim and powerless picture of those affected by disaster.<sup>99</sup>

Darkness ensued as most of the archipelago lost power. Just two days after the hurricane made landfall, Puerto Rico Governor Ricardo Rosselló announced that electricity would resume four to six months later.<sup>100</sup> The media portrayed Puerto Ricans as “powerless,”<sup>101</sup> as people waited for power, waited for potable water, waited for a just recovery, waited to return to normalcy. One month after the hurricane, roughly eighty percent of people were left without power and about a third could not access clean water.<sup>102</sup>

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<sup>94</sup> Lisa Marie Segarra, *Hurricane Maria Made Landfall in Yabucoa, Puerto Rico as a Category 4 Storm*, TIME (Sept. 20, 2017, 11:23 AM), <https://time.com/4949664/hurricane-maria-yabucoa-puerto-rico-map/>; Hilda Lloréns, *Imaging Disaster: Puerto Rico Through the Eye of Hurricane Maria*, 26 TRANSFORMING ANTHROPOLOGY 136, 143, 146 (2018).

<sup>95</sup> *Id.* at 143; Karl Vick & Andres Kudacki, *A Land They No Longer Recognize*, TIME, <https://time.com/a-land-they-no-longer-recognize/> (last visited Apr. 14, 2023).

<sup>96</sup> Laurel Wamsley, *Puerto Rico's Weak Infrastructure Creates Big Challenges For Recovery*, NPR (Sept. 22, 2017, 7:02 PM), <https://www.npr.org/sections/thetwo-way/2017/09/22/552990598/puerto-rico-s-weak-infrastructure-creates-big-challenges-for-recovery>; Laura Sullivan, *How Puerto Rico's Debt Created a Perfect Storm Before the Storm*, NPR (May 2, 2018, 7:10 AM), <https://www.npr.org/2018/05/02/607032585/how-puerto-ricos-debt-created-a-perfect-storm-before-the-storm>.

<sup>97</sup> NAT'L HURRICANE CTR., NAT'L OCEANIC & ATMOSPHERIC ADMIN., COSTLIEST U.S. TROPICAL CYCLONES TABLES UPDATED (Jan. 26, 2018), <https://www.nhc.noaa.gov/news/UpdatedCostliest.pdf>.

<sup>98</sup> Jeff Goodell, *The Perfect Storm: How Climate Change and Wall Street Almost Killed Puerto Rico*, ROLLING STONE (Sept. 12, 2018), <https://www.rollingstone.com/politics/politics-features/puerto-rico-hurricane-maria-damage-722570>.

<sup>99</sup> *See, e.g.*, Vick & Kudacki, *supra* note 95; Jesse Costa, *Photos: Hurricane Maria's Aftermath in Puerto Rico*, WBUR (Oct. 13, 2017), <https://www.wbur.org/news/2017/10/10/photos-hurricane-marias-aftermath-in-puerto-rico>.

<sup>100</sup> Frances Robles et al., *Facing Months in the Dark, Ordinary Life in Puerto Rico Is "Beyond Reach"*, N.Y. TIMES (Sept. 22, 2017), <https://www.nytimes.com/2017/09/22/us/hurricane-maria-puerto-rico-power.html>.

<sup>101</sup> Lloréns, *supra* note 94, at 137.

<sup>102</sup> Yochi Dreazen, *Darkness: Life in Puerto Rico Without Electricity*, VOX (Oct. 23, 2017, 9:00 AM), <https://www.vox.com/2017/10/23/16501164/puerto-rico-hurricane-maria-power-water-sewage-trump>; John D. Sutter, *About 1 Million Americans Without Running Water. 3 Million Without Power. This Is Life One Month After Hurricane Maria.*, CNN, <https://www.cnn.com/2017/10/18/health/puerto-rico-one-month-without-water/index.html> (Oct. 20, 2017, 3:11 PM).

Nearly a year after the disaster, some people remained without power.<sup>103</sup> Although the exact number is unclear, it is estimated that, three years later, at least 4,500 people on the island still had blue tarps over their roofs because they had been unable to repair their homes.<sup>104</sup>

In the aftermath of Maria, those who were able moved to the United States. According to a study by the University of Connecticut and the City University of New York, an “estimated 13,000 *puertorriqueños* . . . came to Connecticut shortly after Maria.”<sup>105</sup> Many of those who arrived in the area temporarily stayed in hotel rooms or local churches before finally settling down.<sup>106</sup> Like other climate-displaced people, finding jobs and housing presented significant challenges.<sup>107</sup> In addition, language barriers—many Puerto Ricans only speak Spanish and have limited fluency in English<sup>108</sup>—indered the experience of newcomers in the state.

Local surveys with both families and institutions providing services indicated that Hartford’s Latinx population—which includes a significant percentage of Puerto Ricans—influenced families’ decisions to relocate to the state capital.<sup>109</sup> Many of the individuals interviewed mentioned that they had friends or family in Hartford with whom they stayed or who helped them transition.<sup>110</sup> The notion that those displaced would find a familiar

<sup>103</sup> Max Zahn, *Puerto Rico’s Power Grid is Struggling 5 Years After Hurricane Maria. Here’s Why*, ABC NEWS (Sept. 22, 2022, 11:55 AM), <https://abcn.ws/3SnLtwO>.

<sup>104</sup> AYUDA LEGAL P.R., TOWARDS A JUST RECOVERY: THE RESPONSE IN THE FACE OF DISASTERS AND THE PUERTO RICO THAT IS POSSIBLE 15–16 (2020), <https://www.ohchr.org/sites/default/files/Documents/Issues/Housing/SubmissionsCFHousingdiscrimin/AyudaLegalPuertoRicoTowardsJustRecovery.pdf> (“In March 2019, the government of Puerto Rico reported that there were 30,000 homes with blue tarps in Puerto Rico . . . [B]y August 2020 this number inexplicably dropped to 4,500.”).

<sup>105</sup> Brenda León, *Los De María: Four Years After the Hurricane, Still Making a Home*, CONN. PUB. (Sept. 15, 2021, 5:53 PM), <https://www.ctpublic.org/2021-09-15/los-de-maria-four-years-after-the-hurricane-still-making-a-home>; CARLOS VARGAS RAMOS & CHARLES R. VENATOR-SANTIAGO, STORM SURGE: REPORT ON THE FINDINGS FROM THE HARTFORD FOUNDATION FOR PUBLIC GIVING SURVEY ON IMPACT OF POST-MARIA DISPLACEMENT OF PUERTO RICANS AND U.S. VIRGIN ISLANDERS ON HOUSEHOLDS IN THE GREATER HARTFORD REGION, FEBRUARY–MAY 2018 4 (2018), [https://www.hfpg.org/application/files/5216/1644/3507/Hartford\\_Foundation\\_Maria\\_Displaced\\_Residents\\_Study.pdf](https://www.hfpg.org/application/files/5216/1644/3507/Hartford_Foundation_Maria_Displaced_Residents_Study.pdf) (finding that Connecticut received about ten percent of the estimated 135,000 Puerto Ricans who came to the United States during the first six months after Hurricane Maria).

<sup>106</sup> León, *supra* note 105.

<sup>107</sup> *Id.*

<sup>108</sup> According to U.S. Census data, 16.7% of Puerto Ricans across the United States and 76% of Puerto Ricans in Puerto Rico “[s]peak English less than ‘very well.’” *Selected Population Profile in the United States*, U.S. CENSUS BUREAU (2021); <https://data.census.gov/table?t=402&tid=ACSSPP1Y2021.S0201>; *Selected Population Profile in Puerto Rico*, U.S. CENSUS BUREAU (2021); <https://data.census.gov/table?t=402&tid=ACSSPP1Y2021.S0201PR>.

<sup>109</sup> RAMOS & VENATOR-SANTIAGO, *supra* note 105, at 11, 18; *Why Hartford?*, HURRICANE MARIA: COMMUNITY WITHOUT LIMITS, <https://action-lab.org/hurricane-maria/why-hartford/> (last visited Apr. 13, 2023).

<sup>110</sup> *Why Hartford?*, *supra* note 109; RAMOS & VENATOR-SANTIAGO, *supra* note 105, at 23 (“The overwhelming majority of these displaced arrivals in Connecticut have been staying with friends or relatives for a few months.”).

language and culture in Hartford played an important role in placing the city on people's radars.<sup>111</sup>

C. *Puerto Rican Women Displaced by Maria: "Yo soy de los de Maria"*

"People need to put themselves in others' shoes to understand what's [really] happening."

*"La gente se tiene que poner los zapatos de uno para saber lo que uno pasa."*

SOFIA, CLIMATE-DISPLACED PERSON

Drawing on six months of ethnographic fieldwork, cultural analyses, and oral histories conducted in New Haven, Connecticut, shortly after the hurricane hit landfall,<sup>112</sup> this section will discuss the enduring effect of a disaster that continues to be embodied in the lives of the displaced. The research centers the voices of climate-displaced people who, because of government social abandonment and neglect, were forced to make New Haven their new home. Specifically, we focus on women, who are often the most vulnerable in the aftermath of disaster. In the aftermath of Hurricane Maria, women and girls specifically were most impacted by the disaster; they were "not prioritized in disaster preparedness planning, during the emergency response to the disaster, nor in the recovery phase."<sup>113</sup> We focus on the pre- and post-disaster impact of displacement on these women as they negotiated ecological disaster and created "spaces of autonomy"<sup>114</sup> for themselves and their families in a strange place.

We apply an ethnographic approach to better understand the effects of forced migration and the dynamics of relocation in the lives of these women with two objectives in mind. First, ethnography serves as a tool to go beyond the narrow cultural constructions of the Puerto Rican condition that

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<sup>111</sup> *Why Hartford?*, *supra* note 109.

<sup>112</sup> On September 20, 2017, co-author Bruni Pizarro was completing her summer graduate research on food insecurity in the Puerto Rican diaspora of New Haven when Hurricane Maria made landfall. The devastation and failed recovery efforts motivated thousands to seek refuge and integrate into mainland society in the diaspora. The ethnographic research presented in this article emerged from fieldwork that began in the fall of 2017, when Pizarro volunteered as an Adult English instructor at the New Haven Public Schools Family Resource Center in Fair Haven. By early October, several Puerto Rican women displaced by the hurricane joined the class and often spoke of the challenges in navigating their new albeit foreign home in the diaspora. This class evolved into a peer support group of mothers seeking to learn English. Pizarro chose to teach English to help alleviate the stress associated with language barriers that may preclude full incorporation in the diaspora. In this process, she engaged with the women and began her fieldwork.

<sup>113</sup> FRANCISCA VIGAUD-WALSH, REFUGEES INT'L, HURRICANE MARÍA'S SURVIVORS: "WOMEN'S SAFETY WAS NOT PRIORITIZED" 1 (2018), <https://www.refugeesinternational.org/reports/2018/9/17/hurricane-marias-survivors-womens-safety-was-not-prioritized>.

<sup>114</sup> The term "spaces of autonomy" is derived from Alicia Schmidt Camacho's talk at N.Y.U. Alicia Schmidt Camacho, Professor of Am. Stud. & Ethnicity, Race & Migration, Yale Univ., Migrant Justice in the Age of Illegality, Lecture at N.Y.U. (Dec. 5, 2018).

dominates the American imaginary, particularly in the context of women impacted by climate change. Second, the development of law and policy on climate displacement issues should be grounded in the experiences of real people and a more nuanced understanding that evokes empathy and humanity. Ultimately, climate displacement solutions should seek to elevate the dignity of climate-displaced people.

#### D. *Methodology*

The ethnographic vignettes that follow were the result of fieldwork conducted by co-author Bruni Pizarro with women living primarily in one New Haven hotel, subsidized through FEMA's Transitional Sheltering Assistance (TSA) program.<sup>115</sup> Through the use of ethnographic methods, including participant observation, the fieldwork took place at the hotel where these families were residing until they found affordable housing in New Haven or elsewhere. The fieldwork also extended to Junta for Progressive Action, one of the primary organizations in Connecticut that provided emergency services to climate-displaced people in the aftermath of Maria.<sup>116</sup> This Article omits the women's last names and other identifiable information to maintain the confidentiality of participants.

#### E. *Narrating Disaster in the Diaspora: Life in a FEMA Hotel*

The hotel lobby was empty but for the hotel staff at the front desk. The blaring flat-screen TV projected onto the dozens of tables and chairs with no one sitting in them, as I waited for Sofia to greet me at the downstairs lobby and escort me up to her room. The front desk employees watched in silence as I sat in the lonely space. It was a sunny, chilly day in February 2018 and the outside could faintly be seen through the semi-opaque, white curtains. The automatic doors opened as patrons exited the building. The hum of traffic from the cars on I-95 percolated throughout. Sofia greeted me at the lobby with a kiss on the cheek and a smile, a common greeting among Puerto Rican women. We took the elevator up to her floor, passing through the cream and burgundy-colored hallway to her room. Her hair was tightly pulled back, her hazel eyes illuminated against the burgundy wallpaper. Sofia sat on one of the two neatly folded full-size beds with a serious disposition. She was wearing a dark hoodie and sat slightly slouched over, waiting for me to begin our conversation. Sofia was from Bayamón, Puerto Rico, is a licensed practical nurse, and worked in a phlebotomy laboratory

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<sup>115</sup> See generally *Transitional Sheltering Assistance*, FEMA (Jan. 9, 2023), <https://www.fema.gov/fact-sheet/transitional-sheltering-assistance>.

<sup>116</sup> See Esteban L. Hernandez, *New Haven Junta's Welcomes Puerto Rican Residents Relocating After Hurricane*, NEW HAVEN REG. (Oct. 18, 2017, 11:12 PM), <https://www.nhregister.com/news/article/Junta-in-New-Haven-welcomes-Puerto-Rican-12288303.php>; see also *supra* notes 89–91 and accompanying text.

in Naranjito, Puerto Rico. Her husband passed away from colon cancer eight years ago, when their daughter, Jenny, was fourteen years old. Sofia continued to live in his family's house with their daughter and met her now-three-year-old daughter's father a few years later. She could not ask her youngest daughter's father to live with her out of respect for her late husband's family, with whom she still lived. For this reason, they could not seriously establish a relationship.

A year before the hurricane made landfall in 2017, Jenny was diagnosed with a cancerous tumor, the same condition as her late father, and was hospitalized in Puerto Rico at Centro Médico, where she received chemotherapy, platelets, and five transfusions. Despite various treatments, Jenny's health did not get better and her doctor refused to operate on the tumor, sending her home to die. Desperate to find a solution, Jenny's boyfriend told Sofia, "You know what? I'm going to take her [to the mainland] because my sister lives in Massachusetts and she is facilitating the transfer of her medical records to [a hospital] in Boston." Jenny and her partner married and moved to Fair Haven, where his brother lived. His brother, wife, and two children lived on the top floor. Jenny and her husband lived with her in-laws as well as her husband's disabled uncle. She continued treatment in Boston at Brigham & Women's Hospital, where doctors successfully removed the tumor and saved her life. Jenny and Sofia both liked living in Fair Haven, finding its ethnic corridor and access to amenities and cultural foods appealing. When I asked if her daughter would return to the island, Sofia responded:

No, because she is married and established with her family. She likes it here. Specifically, they like Fair Haven and do not want to leave this area of New Haven. That environment where they are in Fair Haven and Grand Avenue, . . . I go there and I like it. We walk from her house to the C-Town. We walk to the nail salon. We walk to the laundromat. She loves it.

*No, porque como está casada y establecida con la familia. Ella le gusta aquí. Específicamente, les gusta Fair Haven, no quieren salir de esta área de New Haven. Ese ambiente donde ellos están en Fair Haven y Grand Avenue, . . . yo voy allá y me gusta. Nosotras caminamos de la casa de ella al C-Town. Caminamos a las uñas. Caminamos al laundromat. [A ella le encanta.*

The commercial structures on Grand Avenue that once were owned and operated by working-class Italian Americans now are distinctively Puerto Rican and Latin American.<sup>117</sup> The local subcultures represented in these structures facilitate Latinx place-making, where "Latinos can facilitate

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<sup>117</sup> See *supra* notes 81–86 and accompanying text.

conversations, exchange concerns, and advise or relate to their fellow citizens, becoming active participants in the daily life of their cities.”<sup>118</sup>

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The day before the hurricane made landfall, her youngest daughter’s paternal grandmother invited Sofia and the little one to wait out the hurricane in her cement house in Naranjito. Sofia, her daughter’s father, and his mother waited out the hurricane together. The well-being of the family unit provided greater safety and a distraction from impending or actual devastation. Sofia explained her rationale for waiting out the storm with family:

In these things, you want to be with family. It’s like saying, let’s spend what’s coming [together] as a family. One experiences the hurricane [with family]—playing cards, eating, spending it as a family to clear your mind. [To] not think, or get [nervous] because [the hurricane] is coming, and [you know] you may lose your home, [but] you feel safer with people, so as not to be alone.

*En estas cosas, uno piensa que quiere estar más en familia. Es como decir, vamos a pasar lo que viene [juntos] en familia. Uno pasa el huracán [con familia]—jugando cartas, comiendo, pasándolo en familia para despejar tu mente. [Para] no pensar, ni ponerte [de] nervios porque viene eso [el huracán] azotar, y a lo mejor va a perder tu casa, [pero] uno se siente más segura con personas, para no estar sola.*

Sofia stood lifeless as she gazed out the window to see zinc-paneled roofs fly off of neighboring homes with the wind’s fury. The hurricane passed through Naranjito, a town located in the countryside, where homes were often propped on a grassy knoll and made of wood and zinc-paneled roofs. As the dark of the night passed, the ravaging winds moved through the town, and the sounds of palm tree trunks ripped from their base and the thrash of metal roofs colliding into each other intensified the wait in the darkness. A few days after the hurricane passed, Sofia scoped out the damage. She saw wooden homes completely leveled; the only artifacts that remained were the refrigerator, a stove, or a drenched couch. On the mountainside, a glimmer of light piqued her curiosity:

I rode the bus and went to check it out. On the mountain, instead of seeing fallen trees, all there was were zinc plates . . . zinc plates . . . zinc plates. A mountain of zinc plates.

*Me monté en la guagua y fui [a] averiguar, a ver todo eso. En una montaña, en vez de ver los palos sembrados, lo que había*

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<sup>118</sup> JESUS J. LARA, LATINO PLACEMAKING AND PLANNING: CULTURAL RESILIENCE AND STRATEGIES FOR REURBANIZATION 52–53 (2018).

*eran planchas de zinc . . . planchas de zinc . . . planchas de zinc. Una montaña de planchas de zinc.*

Here, the symbolic mountain of metal roofs that sat on the mountainside represented a tension between nature and modernity; the pileup, a reminder that class and privilege—seen through materiality and construction of homes—increase protections and lower risk and vulnerability during disaster. The new, flatlined topography and glimmering landscape of piled-up metal on the Naranjito countryside no longer represented “home,” a memory imprinted in the minds of residents. By contrast, Sofia returned to her house in Bayamón, an urban neighborhood close to the capital of San Juan, where homes were constructed of cement—a more resilient and costly material. The cement construction of urban homes in Bayamón generally fared better than the metal roof-lined, wooden homes and shacks prominent in rural Naranjito. Fallen electrical poles and tree limbs in the countryside blocked highway and street access, making it difficult for Sofia to investigate the damage to her home in Bayamón. Though there were obstructions that limited access to the road, she recounted her experience with “the wait of disaster.”<sup>119</sup>

Remember that when things happen, the government does not act fast. They don't send machines right away to open the way for you. Unless residents come together and take machete in hand and continue to open the way, continue to cut trees, continue to push trees . . . because if you are going to wait for the government to send machines to move the earth, you will not get anywhere.

*Acuérdate que cuando pasan las cosas, el gobierno no actúa rápido. No te mandan rápido las máquinas a que te abran camino. Al menos que se unan los mismos residentes, que cojan machete en mano, y siguen abriendo camino, siguen cortando palo, siguen empujando palo . . . porque si tu va[s] a esperar que te manden una máquina del gobierno pa' que te mueva la tierra, no va a poder llegar.*

The wait of disaster became an embodiment of grief, as residents understood that the government had abandoned the Puerto Rican people. As scholar Christina Sharpe emphasizes, “The forgotten space is

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<sup>119</sup> Yarimar Bonilla, a Puerto Rican anthropologist and now Director of the Center for Puerto Rican Studies at Hunter College, describes her term “wait of disaster” as “a temporal mode called emergence,” where “emergence” is defined as a “heightened state of awareness, a surge of adrenaline, and perceived need to move fast accompanied with the expectation of change, only met with crushing standstill and delay.” Mallory Adragna, *The Wait of Disaster*, UCLA INT'L INST. (Mar. 15, 2018), <https://international.ucla.edu/Institute/article/189790>.

[B]lackness”—so too are Puerto Ricans unremembered.<sup>120</sup> Does Puerto Rican life not matter? The standstill of social abandonment in the wake of disaster left many in the dark. As Sofia described it:

The government is trash—that’s why I do not vote. So much money was collected and the country remains the same. The country has not improved at all. We are in February [2018] and the country remains the same. Soon the hurricane season will come again and the country still has not been able to recover from that hurricane. Imagine if another atmospheric storm happens? What will be left of the country? Nothing.

*El gobierno es un porquería—por eso yo no voto. Tanto dinero se [ha recolectado] y el país sigue igual. El país no ha mejorado nada. Estamos en febrero [2018] y el país sigue igual. Ya pronto llega otra vez la época del huracán y todavía el país no se ha podido levantar de ese huracán. Imagínate si pasa otra tormenta atmosférica? ¿Qué va quedar del país? Nada.*

Hurricane Maria was a “moment of temporal rupture,” an instance of time where the past, present and future is inextricably linked.<sup>121</sup>

The state of the unknown in the present and the inevitability that is climate change–induced disaster are seen and felt. This temporal rupture, characterized by the standstill of destruction as time ticks away and ushers in the next hurricane, places residents in the temporal labyrinth of climate catastrophe, where loss is experienced simultaneously in the past, present, and future. This perpetual state of precarity begs the question: Do I stay, or do I go?

The loss of power left the archipelago in darkness. Sofia took full advantage of the daylight and would wake up at 6 a.m. to wait in long lines to purchase several small bags of ice to keep food and her daughter’s milk cool. Sofia continued to wait in long lines at the supermarket to get a limited supply of bottled water and canned food. She waited in long lines at the gas station to get gasoline for her generator. But waiting for the darkness to cast its blinding shadow on the archipelago caused trepidation and anxiety. She described her experience in preparation for nightfall:

[During] the day, fine, it’s the day. You do not need electricity because there is daylight, because you can do things even though you are affected a lot by the lack of electricity. At 6 p.m., you begin to prepare mentally . . . because that is what it is to prepare mentally. To prepare mentally for the darkness to

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<sup>120</sup> CHRISTINA SHARPE, *IN THE WAKE: ON BLACKNESS AND BEING* 28 (2016).

<sup>121</sup> Yarimar Bonilla, *The Coloniality of Disaster: Race, Empire, and the Temporal Logics of Emergency in Puerto Rico, USA*, 78 *POL. GEOGRAPHY*, Apr. 2020, at 2.



come, to wait until dawn at 6 a.m., in the middle of the silence of darkness, because you do not hear anything. What you hear are *coquis*. You hear the noises you never heard when you had light. When you had light, you slept fine with your fan on and did not hear anything, but then, in the middle of the night, you hear the twenty noises you never heard when you had light.

*[Durante] el día, fine, está de día. Tu no necesitas luz de día, porque puede[s] hacer las cosas aunque se afecta mucho el trabajo por falta de energía. Ya a las 6 p.m., a prepararse mentalmente . . . porque eso es prepararse mentalmente. Pero [] prepararte para la oscuridad, [] esperar que amanezca a las 6 a.m., en medio del oscuridad del silencio, porque tú no escuchas nada. Tú lo que escucha[s] son los coquis. Tu oyes los ruidos que nunca escuchaste cuando tenías luz. Cuando tenías luz, tu dormías fine con tu abanico, pero no escuchaba nada, pero en medio de la noche, tu escucha[s] los veinte ruidos que nunca escuchaste cuando tenías luz.*

Sofia described the “twenty noises” she’d never heard before as a source of chronic fear and sleeplessness as she waited out the “silence of darkness” for dawn to come. She described this chronic and cyclical anticipation of the mystery and vulnerability associated with the wait for darkness as:

When there is no light, you have to leave the windows open, so you can get a breeze. You do not know who looks out the window to see you in the darkness. Because darkness privileges those who want to do harm. In other words, [it allows for those who want to do harm] to check out what there is [and could be]. And you’re in such deep sleep that you do not even realize if someone shines a flashlight or whatever on you to see you. I did not sleep.

*Cuando no hay luz, tu tiene[s] que dejar las ventanas abiertas, para que te entre brisa. Tú no sabes quien se asoma por la ventana a verte en medio de la oscuridad. Porque la oscuridad sirve pa’ aprovechar el que quiere hacer daño. Como quien dice, averiguar que hay. Y tú estas en un sueño profundo que tu ni te das cuenta si te alumbran con un flashlight o te alumbran con lo que sea pa’ verte. Yo no dormía.*

The loss of the electrical grid created a chronic energy crisis on the archipelago. Electrical generators that would supply power to homes were sold out throughout Puerto Rico.<sup>122</sup> Desperation ensued. This massive

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<sup>122</sup> Richard Fausset et al., *Minus Electrical Grid, Puerto Rico Becomes Generator Island*, N.Y. TIMES (Oct. 7, 2017), <https://www.nytimes.com/2017/10/07/us/puerto-rico-power-generators.html>.

shortage of backup generators caused fear in those who owned and used the generators to power their appliances. The darkness brought other unintended consequences that Sofia described: “The generators caused problems because there were delinquents that would assault you to steal your generator. People went crazy.”

As she waited for the archipelago to reboot and regain normalcy, it became clear that when Hurricane Maria shut down Puerto Rico, the government did not press restart. And the Puerto Rican people suffered. The water supply became contaminated, and their only lifeline was bottled water, which became a valuable commodity on the archipelago. The high demand of bottled water inflated prices—a twenty-four-pack of water was \$2.75 before the hurricane but doubled in price after Maria, Sofia said. Her three-year-old’s diet consisted of CapriSun juice and canned sausage links. Occasionally she had enough water to make rice, but that was a luxury. Sofia permanently lost her job as a nurse in the phlebotomy lab and money was running out. Her seventeen-year-old adopted son was left without a school, as his high school became a seemingly permanent shelter for those displaced by the hurricane. In reflecting on this experience, Sofia affirmed:

He thought he was not going to finish his fourth year [because of the hurricane]. Education ceased because the schools became a shelter. He didn’t know when he could [go back to school], because without water and without light they were not allowing [students] to return to school. The schools were delaying [reopening] and he thought he was going to get left back.

*Él pensaba que no iba terminar su cuarto año [por el huracán]. La educación se [paró] porque las escuelas la[s] cogieron de refugio. No sabía cuándo podría [regresar a la escuela], porque sin agua y sin luz no lo estaban permitiendo ir a la escuela. Todavía las escuelas se estaban tardando [in opening] y él pensaba que se iba a atrasar.*

By early October 2017, water contamination and unsanitary conditions in relief camps contributed to an outbreak of infections (e.g., conjunctivitis, scabies, leptospirosis). Sofia began to experience stomach cramps and diarrhea—symptoms of gastroenteritis. The thought of her children getting sick scared her. Again, the delay in waiting for basic resources caused physical and emotional harm. Her children’s health and social welfare were at stake, again prompting the question: should I stay, or should I go?

Transnational networks with the diaspora are pivotal in times of crisis. Sofia’s family on the mainland encouraged her to leave Puerto Rico. But flights out of the island were hard to come by and Sofia could not afford a flight for herself and two children. One Sunday morning in October, Sofia received a call from her sister, who lived in Hartford and worked at Bradley

International Airport. Her sister said emphatically, “I found flights [for you and your children] on a humanitarian plane, but you have two hours to board.” Jenny pleaded with her mother to get on the plane and said, “Please come to Connecticut . . . things are real bad over there!” Sofia had two hours to pack and arrive at the Isla Grande airport, where her flight awaited. She took whatever belongings she could with her and headed toward the airport. Sofia was about to part from the temporal labyrinth she navigated in perpetual standstill. Having just two hours, her priorities were unveiled, making this moment a critical juncture in her transnational trajectory.

F. *The Gendered Dynamics of Forced Migration*

On October 9, 2017, Sofia, a single mother, boarded the humanitarian plane with her two children. Headed to Newark Airport, the plane carried sick and elderly passengers. A female, non-Spanish-speaking American physician looked after her patients, including a bedridden elderly woman, an elderly woman with an oxygen mask, and a baby boy suffering from microcephaly—a condition caused by the Zika virus. Sofia’s thoughts overwhelmed her senses and she began to cry. She did not get the opportunity to say farewell to her youngest daughter’s father. She described how her departure caused tensions with him and his family:

It really was very difficult. I made the decision without telling anyone. I got on the plane, I could not say goodbye, I was solely focused on [my children’s] welfare. Whoever wants to be angry will be angry. [A relative of the father of her youngest daughter] called me and said that I needed to consult with them [before leaving], that I could not leave. She told me a lot of things. And I said “Look, I’m sorry but I have to do it because nobody [financially] supports me. I have to look for a better future and I have to go.” It was very difficult.

*Realmente fue bien difícil. Yo tomé la decisión sin contar con nadie. Yo me monte en el avión, no me pude despedir, solamente me monte enfocada en el bienestar de ellos [mis niños]. El que se quiere enojar, se enoja. [Un familiar del papa de la hija chiquita] me llamó y me dijo que yo tenía que consultar con ellos [antes de irme], que yo no podría irme. Ella me dijo un montón de cosas. Y yo le dije “Mira, lo siento pero yo tengo que hacerlo porque a mí nadie me mantiene, yo tengo que buscar un futuro mejor y me tengo que ir. Fue bien difícil.*

Here, we see how the “gendered endeavor”<sup>123</sup> of motherhood can increase the precarity of disaster. In Puerto Rico and many other societies—including the continental United States—women are expected to bear greater responsibility for childcare and caregiving. Gendered ideologies are reified through cultural constructions that depict mothers as full-time and fathers as part-time parents, resulting in disproportionate childcare burdens.<sup>124</sup> For single-parent families, as in the case of Sofia, motherhood is all-consuming. The required sacrifices take on different forms depending on factors such as class. For example, in addition to their caregiving role, mothers may need to provide financial support and join the workforce.<sup>125</sup> Sofia’s rebuttal to the relative, “I have to do it because nobody [financially] supports me,” elucidates her agency in disrupting gender norms associated with motherhood. To make matters more difficult, as in the case of Sofia, mothers experience the precarity of “social surveillance,”<sup>126</sup> gendered constructions of gossip that become structural barriers to those migrating transnationally.<sup>127</sup> Leisy Abrego argues that while absentee fathers can retain their masculinity through sexual prowess and independence, migrant women “face greater stigma and more meaningful punishment than men for transgressing parental gender boundaries.”<sup>128</sup> From a disaster context, scholars consistently note that mothers bear a greater share of responsibilities in preparedness and in seeking shelter at all stages of disaster.<sup>129</sup> Given the burdens experienced by mothers during and in the aftermath of a disaster, the uneven distribution of labor may increase their “predisaster vulnerability” and pose greater challenges during recovery.<sup>130</sup>

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<sup>123</sup> See Lori Peek & Alice Fothergill, *Displacement, Gender, and the Challenges of Parenting After Hurricane Katrina*, 20 NAT’L WOMEN’S STUD. ASS’N J. 69, 70 (2008).

<sup>124</sup> *Id.* at 71 (citing Glenda Wall & Stephanie Arnold, *How Involved Is Involved Fathering?: An Exploration of the Contemporary Culture of Fatherhood*, 21 GENDER & SOC’Y 508 (2007)).

<sup>125</sup> LEISY J. ABREGO, SACRIFICING FAMILIES: NAVIGATING LAWS, LABOR, AND LOVE ACROSS BORDERS 10 (2014).

<sup>126</sup> *Id.* (characterizing “social surveillance” as the policing of mothers—through gossip and other negative interactions—“into fulfilling their expected roles as self-sacrificing providers”).

<sup>127</sup> *Id.*

<sup>128</sup> *Id.* at 11.

<sup>129</sup> See Peek & Fothergill, *supra* note 123, at 71–72 (citing Elaine Enarson et al., *Gender and Disaster: Foundations and Directions*, in HANDBOOK OF DISASTER RESEARCH 130 (Havidán Rodríguez et al. eds, 2007); Elaine Enarson & Joseph Scanlon, *Gender Patterns in Flood Evacuation: A Case Study in Canada’s Red River Valley*, 7 APPLIED BEHAV. SCI. REV. 103 (1999); ALICE FOTHERGILL, HEADS ABOVE WATER: GENDER, CLASS, AND FAMILY IN THE GRAND FORKS FLOOD (2004); Sarah J. Halvorson, *Women’s Management of the Household Health Environment: Responding to Childhood Diarrhea in the Northern Areas, Pakistan*, 10 HEALTH & PLACE 43 (2004)).

<sup>130</sup> *Id.* at 72 (“The division of labor at home, particularly regarding caregiving roles and responsibilities, may increase women’s predisaster vulnerability and place additional burdens on women during recovery . . . .”) (citing Keiko Ikeda, *Gender Differences in Human Loss and Vulnerability in Natural Disasters: A Case Study from Bangladesh*, 2 INDIAN J. GENDER STUD. 171 (1995); Joan W. Rivers, *Women and Children Last: An Essay on Sex Discrimination in Disasters*, 6 DISASTERS 256 (1982)).

Sofia and her two younger children moved in with Jenny, her husband, and his three relatives. The crowded conditions made living with her daughter difficult. The landlord also placed additional restrictions, limiting the length of stay for visitors. This was a common occurrence as relatives of climate-displaced people offered their homes<sup>131</sup> but often faced eviction themselves if the landlord learned that visitors were overstaying. These kin and familial networks in the diaspora were often low-to-lower middle class but were transnational first responders in the climate crisis despite a scarcity of resources.<sup>132</sup> Drawing on the belief that collective outcomes are greater than individual pursuits, Puerto Rican kin and familial networks in the diaspora were frontline in buffering the failure and social abandonment of Puerto Ricans by the island and federal governments. Further, with long waiting lists before the hurricane, New Haven could not easily provide affordable housing to the over 800 displaced persons, including 200 children.<sup>133</sup> Kin and familial networks helped buffer this demand by offering their homes to loved ones in need.

“What are we going to do? Where am I going to go now?” Sofia thought to herself. She called 211 for information on social services. Because of her status as a climate-displaced person with children, the representative on the phone helped her obtain temporary housing at a local hotel for a few weeks. Knowing that her time was limited at the hotel, she sought help from social workers at the Salvation Army. New Haven civic organizations and government disaster officials convened for monthly disaster meetings.<sup>134</sup> After the hurricane, an unprecedented upsurge of climate-displaced people arrived in New Haven. The meetings began to prioritize the needs of new arrivals, including housing, health care, employment, and other direct services. Representatives from Junta and the Salvation Army, as well as other civic organizations, came together to discuss cases and share resources. At one of these meetings, the social workers from the Salvation

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<sup>131</sup> See RAMOS & VENATOR-SANTIAGO, *supra* note 105, at 18 (finding in a survey of displaced emigrants in Hartford that “83 percent of respondents indicated that kin displaced by the storms had stayed with them in their homes for a few months”).

<sup>132</sup> *Id.* (“92 percent of those making between \$25,000 and \$39,999 indicated their kin had stayed with them for a few months; while all respondents (100%) making between \$40,000 and \$59,999 mentioned this was the case”).

<sup>133</sup> For more on New Haven’s response to the housing crisis for climate-displaced people, see Kent Pierce, *FEMA to Stop Paying for Hotels for Puerto Rican Evacuees in CT*, NEWS8 WTNH.COM (Feb. 12, 2018, 6:05 AM), <https://www.wtnh.com/news/politics/fema-to-stop-paying-for-hotels-for-puerto-rican-evacuees-in-ct/>; Noelle Gardner, *Time and Money Running Dry for Families Who Fled Hurricane-Battered Puerto Rico*, NEWS8 WTNH.COM (Feb. 14, 2018, 5:10 PM), <https://www.wtnh.com/news/connecticut/new-haven/time-and-money-running-dry-for-families-who-fled-hurricane-battered-puerto-rico/> (quoting Junta director Paola Serrecchia: “We already have a homeless epidemic. We already had family shelters that are full.”).

<sup>134</sup> Pierce, *supra* note 133 (“Ever since Hurricanes Irma and Maria devastated Puerto Rico, leaders of New Haven Agencies and charitable groups get together every week to talk about how to help the thousands of evacuees who settled in Connecticut.”).

Army helped Sofia find another hotel to stay in for several days. When her time at the hotel came to an end, the social workers escorted her to Life Haven, a woman's shelter in Fair Haven. But the shelter was at maximum capacity—a common occurrence in New Haven—and social workers could not find where to place her and her children that evening. A fortuitous confluence of circumstances gave way to FEMA announcing the Transitional Sheltering Assistance (TSA) program, in which FEMA covers hotel or lodging.<sup>135</sup> She called 211 to apply for the TSA program and exactly one month after her arrival, Sofia and her children were still living in a hotel in New Haven, as were eight other displaced Puerto Rican families. She spent Thanksgiving, Christmas, and New Year's Eve at the hotel and watched her first snowfall from her window on the seventh floor. The last day that FEMA would pay for lodging was February 14, 2018.<sup>136</sup>

Before the hurricane, Sofia owned a car and worked as a nurse. In Puerto Rico, she did not depend on government support and used to pride herself on being dependent on no one. "If I find a job, believe me that I will not depend on the government because in Puerto Rico I didn't do it, much less here," she said. Sofia dreamed of having her own apartment and learned to cook rice in a microwave. This was hotel life. She fried chicken cutlets on her electric hotplate and had a larger mini-fridge, but it was not the same as a full kitchen. She wished her teenage son could have the space he needed to mature into young adulthood. She imagined the day that her daughter could make a mess with her toys in her own room. These are privileges that she and her family lost upon being uprooted.

In an instant, the lives of the displaced completely changed. The profound emotional disturbance experienced by Sofia and others in the hotel can be understood as "root shock," the emotional and physical response to a hurricane or "blow," and the "shock" that results is the body's response to regain homeostasis.<sup>137</sup> It is the feeling of being in a constant state of emergency. This injury has an enduring, ripple effect that lasts a lifetime.<sup>138</sup>

The hotel offered a free shuttle service where guests could travel within a five-mile radius. Puerto Rican families took the shuttle to Walmart to buy groceries. The shuttle took Sofia's daughter to and from school (Headstart). Though the shuttle reduced barriers for the Puerto Rican families at the hotel to access key resources, Sofia was saving for her own car—she needed at least \$1,000 to get something decent. A car would help her be more mobile so that she could continue to pursue her professional goals. As she said:

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<sup>135</sup> See *supra* note 115 and accompanying text.

<sup>136</sup> Pierce, *supra* note 133.

<sup>137</sup> MINDY THOMPSON FULLILOVE, ROOT SHOCK: HOW TEARING UP CITY NEIGHBORHOODS HURTS AMERICA, AND WHAT WE CAN DO ABOUT IT 11–12 (2016).

<sup>138</sup> *Id.* at 12.

Since I am a nurse, I cannot go to work as a cashier. Although it can be done out of necessity, remember that when you have your profession, and you like something, you focus on that. For example, I sent many applications to take care of people in their homes—elderly people. But you need a car to go to visit because buses pass every hour. I can't have three patients in one day and go by bus. I lose an hour waiting for the bus to take me to [someone's] home . . . and then I have to get on another bus so I can go to the other patient's house—how can I do that?

*Como yo tengo la profesión de enfermería yo no puedo irme a trabajar de cajera. Aunque sea una necesidad, acuérdate que ya cuando tú tienes tu profesión, y te gustas algo, tú te enfoca[s] en eso. Por ejemplo, aquí he enviado muchas solicitudes para cuidar personas en las casas—personas . . . , pero tu tiene[s] que tener un carro porque las guaguas pasan cada una hora. Yo no puedo tener tres pacientes en un día para irme en guagua. Pierdo una hora en esperar la guagua para que me lleve a la casa de [alguien] . . . y después tengo que montarme en otra guagua para poder ir a la casa del otro paciente...¿cómo yo voy hacerlo?*

#### G. *The New Puerto Rican Diaspora*

With the impending FEMA deadline fast approaching, Sofia and others in the hotel went to Junta to fill out affordable housing applications. And waited. As new housing developments were constructed in Fair Haven and the Hill—another predominantly Puerto Rican neighborhood—you could hear the buzz of excitement in the voices of the Puerto Rican women in the hotel as they beamed at the prospect of being called for an interview. New Haven offered priority on the affordable housing list to those displaced by the hurricane, but this was not always well-received by those who had been on the waitlist for an extended period of time. There was an affordable housing shortage in New Haven, and some diasporic Puerto Ricans perceived the displaced newcomers as competing for their access to resources. One of the women in the hotel explained this experience:

A [Puerto Rican] girl the other day was angry because she says why should they help us [new arrivals] if she has been here for three years and they have not offered her any help.

*Una muchacha el otro día estaba enfogona ' porque ella dice que porque nos van ayudar si ella lleva aquí tres años y ellos no le daban ayuda.*

These divergent experiences are rooted in profound transnational tensions. Scholars have noted differences between island-born Puerto Ricans and those of the diaspora, specifically in gateway cities like New York and Chicago.<sup>139</sup> Many island-born Puerto Ricans construct ghettoized prototypes of diasporic Puerto Ricans, deeming them inferior and questioning their Puerto Rican authenticity.<sup>140</sup> Having felt othered by their island counterparts, diaspora Puerto Ricans (i.e., DiaspoRicans) may feel antipathy toward new arrivals from Puerto Rico.<sup>141</sup> New Puerto Rican diaspora settlements are spaces where collective identities and community formation are challenged and negotiated.<sup>142</sup> As new destination settlements like New Haven emerge, forced migration becomes the conduit by which social conditions are cultivated to negotiate status and position between displaced island–Puerto Ricans and their diasporic counterparts. It is important to note that in the case of Fair Haven, these spatialized interactions often are contained within the “walls of the ghetto.”<sup>143</sup>

H. *I Didn't Come Here Because I Wanted to be Here /*  
Yo No Vine Porque Quise Venir

On September 20, 2017, a powerful Category 4 hurricane with 155 mph winds first entered through the town of Yabucoa.<sup>144</sup> This is where Luz, a thirty-nine-year-old mother of four, is from. I met Luz in early October 2017, when I taught English to adult learners at Fair Haven School. Later, when I asked Luz why she migrated to the mainland, she said:

I didn't come here because I wanted to be here. . . . I came here because my children were dealing with a situation [in Puerto Rico]. I feared that they would get sick. . . . I was scared. Why do they have to live a life of sacrifice—why do

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<sup>139</sup> Patricia Silver, *New Puerto Rican Diasporas in the Southern United States*, in *PUERTO RICANS AT THE DAWN OF THE NEW MILLENNIUM*, 82, 85 (Edwin Meléndez & Carlos Vargas-Ramos eds., 2014) (collecting sources).

<sup>140</sup> See *id.* (citing Arlene M. Dávila, *SPONSORED IDENTITIES: CULTURAL POLITICS IN PUERTO RICO* (1997); Eileen J. Findlay, *Portable Roots: Latin New Yorker Community Building and the Meanings of Women's Return Migration in San Juan, Puerto Rico, 1960–2000*, 37 *CARIBBEAN STUD.*, July–Dec. 2009, at 3; Ana Y. Ramos-Zayas, *NATIONAL PERFORMANCES: THE POLITICS OF CLASS, RACE, AND SPACE IN PUERTO RICAN CHICAGO* (2003); Raquel Z. Rivera, *Will the “Real” Puerto Rican Culture Please Stand Up? Thoughts on Cultural Nationalism*, in *NONE OF THE ABOVE: PUERTO RICANS IN THE GLOBAL ERA* 217 (Frances Negrón-Muntaner ed., 2007); LUIS SÁNCHEZ, *THE NEW PUERTO RICO? IDENTITY, HYBRIDITY AND TRANSNATIONALISM WITHIN THE PUERTO RICAN DIASPORA IN ORLANDO, FLORIDA* (2009); Patricia Silver, “*Culture Is More than Bingo and Salsa*”: *Making Puertorriqueñidad in Central Florida*, 22 *CENTRO: J. CTR. FOR PUERTO RICAN STUD.*, Spring 2010, at 57).

<sup>141</sup> See *id.* (citing Julio Firpo, *Forming a Puerto Rican Identity in Orlando: The Puerto Rican Migration to Central Florida, 1960–2000* (2012) (M.A. thesis, University of Central Florida); Ramos-Zayas, *supra* note 140).

<sup>142</sup> See *id.* at 93.

<sup>143</sup> FULLILOVE, *supra* note 137, at 27.

<sup>144</sup> Segarra, *supra* note 94.



they have to lose out on going to school if I can find something better for them?

Luz moved in with her younger sister and brother-in-law, but space was limited, so Luz sought assistance from a local organization to help with housing. She obtained temporary housing and lived in a FEMA-subsidized hotel in New Haven. She recounted how, because of displacement and her personal crisis in the aftermath of Hurricane Maria, she was five months behind on her mortgage payments. It was February 2018, and the conversation took place in her crowded hotel room, where she slept with her four children. She feared losing her home in Puerto Rico. It was nearly five months after the hurricane, and FEMA had not checked the damage that her house endured. And so she waited.

### I. *The Sleeplessness in the Wait*

After enduring months without electricity and clean water in Puerto Rico, Carmen, a forty-nine-year-old mother with adult children, grew impatient. She decided to live with her daughter, who had lived in New Haven for some time. When I met her, Carmen had been homeless in New Haven for two months. “It’s been a long time since I’ve slept,” she said, explaining that she feared being sexually assaulted if she dozed off. The indignity of being homeless extended to her waking hours; she recounted how local businesses had not allowed her to use their restrooms, leading her to minimize eating to reduce her need to use their facilities.

Carmen is a refugee, in her own country, from Hurricane Maria. Aged by her struggles in life, she does not read or write and lost her front teeth in a car accident years ago. A Puerto Rican couple picked her up from the park where she slept and brought her in to live with them temporarily. Accompanied by the woman who helped her, she sought basic services like healthcare, Supplemental Nutrition Assistance Program (SNAP) benefits, and affordable housing. I learned that she did not feel welcome in her daughter’s crowded one-bedroom apartment, and experienced daily tension with her daughter’s partner. She needed to get out and told her daughter that she was staying with a friend when, in reality, she lived on the streets in a foreign place, away from everything she had known. She complained of stomach pains and vomiting and had not eaten for three days before our interview. We later learned that she had a stomach infection that potentially began in Puerto Rico, caused by contaminated water. Carmen would not stop crying. She said that during the hurricane she remained fixed to the window and saw firsthand how the hurricane pillaged through her neighbors’ homes. Carmen said this incessant visual replaying in her mind caused her trauma. She told me that her son died in Puerto Rico shortly after the hurricane. One hundred bullets were shot outside her home. She associated the blackout with the death of her son. Carmen believed that he was a decent person and

great son—he didn’t get into trouble—but that his murderers killed him mistakenly since it was dark. She attributes his death to the seemingly indefinite blackout.

Carmen eventually moved back in with her daughter, but after a few months, her daughter purchased a one-way ticket for Carmen and said, “I love you so much, but I’m in a situation [and you have to go].” Although Carmen took care of their children, her daughter’s partner would incessantly complain about Carmen using the kitchen and taking up space in the crowded apartment. Before she returned to Puerto Rico, Carmen started seeing a therapist, who encouraged her to return to Puerto Rico to confront the trauma she experienced with the hurricane and her son’s death. For Carmen, Puerto Rico was equated with pain.

Once she was back in Puerto Rico, Carmen would often say, “I cry more here. It’s not easy to confront things . . . if I had a therapist here (in Puerto Rico), it would be different, but I don’t. It’s difficult to get a therapist in PR. But that psychiatrist is there and I’m here . . . .”

#### V. RESETTLING CLIMATE-DISPLACED PEOPLE: LESSONS LEARNED FROM NEW HAVEN

The United States has a long history of welcoming refugees and has traditionally been one of the largest refugee resettlement countries in the world.<sup>145</sup> There are currently nine national resettlement agencies with local offices and affiliates located throughout the country.<sup>146</sup> Connecticut houses three refugee resettlement agencies that each welcome roughly 1,000 refugees each year.<sup>147</sup> In 2018, the state spent \$4.4 million on hurricane relief for Puerto Rican evacuees.<sup>148</sup> During the hurricane crisis, the City of New Haven quickly assembled the Mayor’s task force on Puerto Rico hurricane

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<sup>145</sup> See, e.g., *The Refugee Act*, OFF. OF REFUGEE RESETTLEMENT (Aug. 29, 2012), <https://www.acf.hhs.gov/orr/policy-guidance/refugee-act> (discussing the Federal Refugee Resettlement Program under 8 U.S.C. § 1521); *Resettlement in the United States*, U.N. HIGH COMM’R FOR REFUGEES, <https://www.unhcr.org/en-us/resettlement-in-the-united-states.html> (last visited Apr. 14, 2023). *But see President Trump’s Executive Orders on Immigration and Refugees*, CTR. FOR MIGRATION STUD. (Jan. 29, 2017), <https://cmsny.org/trumps-executive-orders-immigration-refugees/>.

<sup>146</sup> *Resettlement in the United States*, *supra* note 145. The agencies are the Church World Service (CWS), Ethiopian Community Development Council (ECDC), Episcopal Migration Ministries (EMM), Hebrew Immigrant Aid Society (HIAS), International Rescue Committee (IRC), U.S. Committee for Refugees and Immigrants (USCRI), Lutheran Immigration and Refugee Service (LIRS), United States Conference of Catholic Bishops (USCCB), and World Relief (WR). *US Resettlement Partners*, U.N. HIGH COMM’R FOR REFUGEES, <https://www.unhcr.org/en-us/us-resettlement-partners.html> (last visited Apr. 14, 2023).

<sup>147</sup> Ruiyan Wang, *Hurricane Evacuees Settle into New Lives in CT*, YALE DAILY NEWS (Sept. 6, 2018, 11:06 PM), <https://yaledailynews.com/blog/2018/09/06/hurricane-evacuees-settle-into-new-lives-in-ct/> (discussing Junta for Progressive Action); Matt McFarland, *IRIS in New Haven Preparing for Ukrainian Refugees*, EYEWITNESS NEWS 3 (Mar. 4, 2022, 4:43 PM), <https://www.wfsb.com/2022/03/04/iris-new-haven-preparing-ukrainian-refugees/> (discussing Integrated Refugee and Immigrant Services).

<sup>148</sup> Markeshia Ricks, *Hurricane Maria Relief Tops \$4M*, NEW HAVEN INDEP. (June 5, 2018, 7:57 PM), [https://www.newhavenindependent.org/article/candelaria\\_shepherds\\_hurricane\\_maria\\_relief](https://www.newhavenindependent.org/article/candelaria_shepherds_hurricane_maria_relief).

evacuation, which brought together key stakeholders that included Junta and Integrated Refugee and Immigrant Services (IRIS).<sup>149</sup> Together, Junta and IRIS provided resettlement services for over 1,200 people.<sup>150</sup> These newcomers especially needed housing assistance and school enrollment support for children.<sup>151</sup>

Although local organizations joined forces to provide important emergency support, limitations persisted. These limitations included a lack of communication, inefficient service delivery, and duplication of services.<sup>152</sup> Connecticut and its social service providers did not anticipate needing to resettle such a large number of climate-displaced people from Puerto Rico.<sup>153</sup> The City of New Haven had a climate change framework, but this document at no point addressed providing services for climate-displaced people.<sup>154</sup> As described by the stories of women like Sofia and Carmen, these services include housing, health care, transportation, and education, among others. Like many municipalities, New Haven focused on climate mitigation and adaptation, as opposed to climate emergency preparedness and response or climate-related resettlement. Fortunately, the City of New Haven had a strong Office of Emergency Preparedness and Response that jumped into action and was a crucial member of the task force that facilitated collaborations across sectors.<sup>155</sup> Although emergency preparedness and response were vital to respond to the needs of climate-displaced people from Puerto Rico, deeper resettlement services were necessary.

The population of Connecticut, as of July 2022, was 3,626,205,<sup>156</sup> while the population of New Haven was 135,081, of which about 23,500 people

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<sup>149</sup> Wang, *supra* note 147; Thomas Breen, *City Prepares To Welcome Hurricane Dorian Refugees*, NEW HAVEN INDEP. (Sept. 9, 2019, 2:23 PM), [https://www.newhavenindependent.org/article/hurricane\\_dorian](https://www.newhavenindependent.org/article/hurricane_dorian) (noting the task force, “a partnership among the city’s police, fire, health, emergency operations, and elderly services departments along with outside humanitarian agencies . . . , was originally convened . . . in response to the devastation and fall out from Hurricane Maria’s ravaging of Puerto Rico”).

<sup>150</sup> Wang, *supra* note 147.

<sup>151</sup> *Id.*

<sup>152</sup> See *Institutional Failures*, HURRICANE MARIA: COMMUNITY WITHOUT LIMITS, <https://action-lab.org/hurricane-maria/failures/> (last visited Apr. 15, 2023).

<sup>153</sup> *Id.* (“The lack of preparedness for the amount of individuals who migrated to Hartford created additional constraints when devising a plan to assist the families.”); RAMOS & VENATOR-SANTIAGO, *supra* note 105, at 5 (“The Hartford Foundation was concerned about the lack of information about the probability that people from the Caribbean region displaced by the cyclones would relocate to the Greater Hartford Region and the magnitude of the number of individuals who might relocate.”).

<sup>154</sup> See CITY OF NEW HAVEN, CLIMATE & SUSTAINABILITY FRAMEWORK (2018), <https://portal.ct.gov/-/media/DEEP/climatechange/publications/CityofNewHavenClimateandSustainabilitypdf.pdf>.

<sup>155</sup> Randall Beach, *Blumenthal, Murphy Want More Help for Puerto Rico, Where They Found “Abject Neglect,”* CT INSIDER (Jan. 5, 2018), <https://www.ctinsider.com/news/article/Blumenthal-Murphy-want-more-help-for-Puerto-16961755.php>; Wang, *supra* note 147; see also *Emergency Preparedness*, CITY OF NEW HAVEN, <https://www.newhavencity.gov/government/departments-divisions/nhv-health/emergency-preparedness-826> (last visited Apr. 16, 2023).

<sup>156</sup> *Quick Facts: New Haven city, Connecticut*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/fact/table/newhavencityconnecticut,CT/PST045222> (last visited Apr. 16, 2023).

were foreign-born.<sup>157</sup> Cities of similar size and social makeup that are resettling climate-displaced people would benefit from a convening of stakeholders to address climate adaptation strategies, emergency planning and response, and resettlement planning. In the case of New Haven, such stakeholders might include: the City of New Haven's Office of Emergency Management, United Way of Greater New Haven, 2-1-1 of Connecticut, New Haven Public Schools, the Connecticut Department of Social Services and Department of Children and Families, and other migrant-serving organizations. Furthermore, governments must explore mechanisms for tracking migration data and resources, allowing stakeholders to identify trends and respond effectively to future climate-related migration and displacement. This data would give policy makers, service agencies, and funders insights into best practices for resettling climate-displaced people.

Governments must prepare for the scale, scope, and frequency of future disasters worsened by climate change. In anticipation of climate change, governments tend to focus on mitigating greenhouse gases or adapting to climate impacts.<sup>158</sup> The World Bank recommends that countries experiencing climate-related migration and displacement engage in relocation planning.<sup>159</sup> There are three phases to be considered in developing relocation planning. The first phase ensures that communities are not displaced in the first place—building the capacity for both government officials and community members to adapt to a changing climate.<sup>160</sup> Migration is a type of climate adaptation, while displacement is an emergency response.<sup>161</sup>

When mitigation and adaptation are not sufficient, emergency preparedness and response are essential to minimize and address displacement. This second phase sees that people who are displaced are able to move safely and that there are programs planned by the government that provide social services and assimilation assistance in a temporary or new permanent location.<sup>162</sup> Emergency preparedness and response is a short-term solution, albeit an important one. Thus, a long-term solution is required after a climate emergency is managed. This third phase facilitates sustainable assimilation that considers not only a climate-displaced person but also the existing residents of the temporary or new permanent location to achieve social cohesion.<sup>163</sup> Governments must plan and implement a comprehensive resettlement action plan. A successful resettlement plan ensures that

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<sup>157</sup> *Id.*

<sup>158</sup> Kanta Kumari Rigaud et al., World Bank Grp. [WBG], *Groundswell: Preparing for Internal Climate Migration*, at 181–85 (2018), [https://openknowledge.worldbank.org/bitstream/handle/10986/29461/WBG\\_ClimateChange\\_Final.pdf](https://openknowledge.worldbank.org/bitstream/handle/10986/29461/WBG_ClimateChange_Final.pdf).

<sup>159</sup> *Id.* at 4–5.

<sup>160</sup> *Id.* at 186.

<sup>161</sup> See WHITE HOUSE, *supra* note 11, at 4 (“Migration in response to climate impacts may range from mobility as a proactive adaptation strategy to forced displacement in the face of life-threatening risks.”).

<sup>162</sup> See Rigaud et al., *supra* note 158, at 33.

<sup>163</sup> *Id.* at 187.

climate-displaced people can achieve self-sufficiency through empowerment programs that encourage equitable economic opportunities. The combination of these three phases works toward achieving a resilient society “where people can . . . migrate with dignity toward areas of higher opportunity.”<sup>164</sup> Migrant-serving organizations and community groups are at the forefront of emergency response efforts for climate-displaced people. Governments should honor this community knowledge and invest in such efforts. Both migrant-serving organizations and community groups need funding to supply climate-displaced people with housing, food and other basic necessities, health resources, education services, and job placement services. However, migrant-serving organizations and community groups cannot singlehandedly resettle climate-displaced people.

To ensure long-term social cohesion and economic empowerment, governments must invest in gender-sensitive and trauma-informed communications to inform climate-displaced people about resources in the community and how to prevent double climate displacement. Host cities like New Haven face their own share of climate vulnerabilities that can cause displacement.<sup>165</sup> Governments must invest in local climate resilience hubs that supply water, solar-powered electricity, and cooling or heating spaces. Trusted migrant-serving organizations should host these climate hubs, where they can hold community meetings led by input from climate-displaced people. These community meetings can help disseminate projected local climate impacts and solutions. Lastly, climate hubs can assess impacts after local climate disruptions by gathering stories and information and providing gathering space for climate-displaced people, experts, other aid organizations, volunteers, and support networks to gather and better understand and help meet community needs.

## CONCLUSION

The devastating reality that climate change–induced disaster is likely to generate another, potentially stronger storm casts fear and doubt in the minds and hearts of climate-vulnerable communities. The 2022 hurricane season

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<sup>164</sup> World Bank Grp. [WBG], *Internal Climate Migration in Latin America*, at 1, Groundswell: Preparing for Internal Climate Migration Pol’y Note No. 3 (2018), <https://openknowledge.worldbank.org/server/api/core/bitstreams/a240f3c4-2d3f-5e77-abc4-e1053dc4ecf5/content>.

<sup>165</sup> See, e.g., Judy Benson, *In New Haven, Confronting Realities, Responses to Climate Crisis*, UNIV. OF CONN.: CONN. SEA GRANT (Oct. 31, 2022), <https://seagrant.uconn.edu/2022/10/31/in-new-haven-confronting-realities-responses-to-climate-crisis/> (discussing how New Haven needs to make plans for increased flooding and rising sea levels to protect their communities); see also *Conservation L. Found., Inc. v. Shell Oil Co.*, No. 21CV00933, 2022 WL 4292183, at \*8 (D. Conn. Sept. 16, 2022) (“These allegations make[] clear that a major weather event, magnified by the effects of climate change, could happen at virtually any time, resulting in the catastrophic release of pollutants due to Defendants’ alleged failure to adapt the [New Haven oil] Terminal to address those impending effects. While it might not occur for many years, the fact that it is certainly impending is enough to meet the standard [of demonstrating imminence for the purposes of standing].” (internal quotation marks omitted)).

brought Hurricane Fiona, which left much of Puerto Rico without electricity for weeks.<sup>166</sup> The lasting effects of “root shock”—of being uprooted by disaster and forced to leave loved ones behind—continue to foreground the lives of the displaced as well as their neighbors in the diaspora. We can conclude that these individuals never truly escaped disaster.

This Article illuminates that the “wait of disaster” did not end upon relocation. The women in this study continued their wait as they waited for basic services like affordable housing in a foreign city. The stories of Sofia and Carmen illustrate how guaranteeing entry and permanent status is only one step in a much longer process to support climate-displaced people. Ultimately, a holistic response involves securing meaningful access and provision of essential services in the long term.

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<sup>166</sup> Becky Sullivan, *More than 100,000 Clients in Puerto Rico are Still Without Power 2 Weeks After Fiona*, NPR (Oct. 2, 2022, 11:29 AM), <https://www.npr.org/2022/10/02/1126462352/puerto-rico-hurricane-fiona-luma-energy-power-outages>.

