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Comments from Good Jobs New York regarding New York City's proposal to amend its Action Plan A

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Transparency & Community Engagement

We are unsure why the city consistently only adheres to the minimum seven-day comment period as required by the Department of Housing and Urban Development. This seems to counter to one of the main principles of the August report released by the federal Hurricane Sandy Regional Task Force: *Hurricane Sandy Rebuilding Strategy: Stronger Communities, A Resilient Region*.

Good Jobs New York and many like-minded groups provided thoughtful and informed comment during the city's two-week comment period in March before the Action Plan was approved. Yet, the plan has been amended three times since then with absolute minimal notice or explanation. For an administration pursuing various policy initiatives regarding technology, why can't it use social media to inform the public of proposed changes to how it wants to use Sandy funds?

The most recent amendment, announced on Friday, October 4th, proposes substantial changes to the city's original plan. It was at this time that we learned this is the fourth amendment to Action Plan A. This minimal notice of seven days and news of three other amendments is unfair and fails to build confidence that our rebuilding officials can oversee a transparent rebuilding process.

We are more than aware of the dire needs of Sandy impacted communities and are anxious for these grants to help them recover and rebuild. Yet, limiting the voices of residents and groups helping them will not build a stronger, resilient city.

In a statement released today, Good Jobs New York joined with more than a dozen groups asking the city to:

- Provide the public with periodic breakdowns of how Sandy CDBG funds have been allocated in New York City. It is our understanding that this is required by the federal Disaster Relief Act. If very few or no funds have been allocated, the public deserves to know that.
- Agree that comment periods for further amendments to the Action Plan be at least 21 days.

- Create a process that informs individuals that provided comments to the original plan of all amendments, including those that are not substantial enough, as required by HUD, to have a comment period.
- Allow for a venue where residents can ask questions about the proposal. While community meetings would be ideal, this could be a conference call or webinar.

Economic Development Policies (under Business section VIII):

Regarding two proposed changes that affect the New York City Economic Development Corporation, it seems that:

Utilities can no longer receive waivers and therefore, not participate in NYCEDC competitions. We are unsure if this applies to all utility companies, or only those of a certain size. This is positive news but would like the city to provide more clarification on the potential impacts on cooperative green utilities.

The proposed amendment appears to weaken language regarding CDBG impacts on low and moderate income communities or employees: “preference may be given for projects that demonstrate maximum impact to low- and moderate- income communities/employees.” This is a departure from the Action Plan (page 90) stating that specified businesses MUST “demonstrate impact to low- and moderate-income communities”

We are pleased to see the removal of language (for the Business Resiliency Investment Program and Building Resiliency Technologies Competition) that would allow NYCEDC to apply for a waiver to allocate funds to businesses that are larger than the US Small Business Administration definition.

Please contact us with any questions or comments.

Thank you,
Bettina Damiani
Project Director