

Exhibit B Threshold Requirements
New York State
ExhibitBThresholdReq_NYS.pdf

Introduction

For the purposes of the HUD National Disaster Resilience Competition (NDRC) Phase 1 application, HUD has identified the State of New York as an eligible applicant. This document serves as the one application being submitted to this competition by the eligible applicant, New York State. The State has identified unmet economic revitalization, infrastructure, and housing recovery needs across 11 counties (Greene, Nassau, Schoharie, Suffolk, Tioga, Westchester, and the five counties of New York City), composing the State's 11 target areas in this Phase 1 application. These NDRC-eligible counties constitute 11 of New York State's 15 counties that have been identified by HUD as Most Impacted and Distressed areas as a result of federally declared disasters from 2011 through 2013. This Exhibit B narrative response is supported by the best available data and conforms to the threshold requirements outlined in Appendix G of the NDRC Notice of Funding Availability (NOFA) released on September 17, 2014. This narrative is also informed by a comprehensive unmet needs analysis recently undertaken by the State as part of Action Plan Amendment Eight (APA8), as required by FR-5696-N11 issued October 16, 2014. As a current HUD grantee, the State periodically amends its Action Plan to document the proposed use of funding to support continued recovery efforts. This process is one of the ways the State possesses a deep understanding of the evolving unmet recovery needs of storm-impacted communities.

The State considers the data referenced as part of the APA8 unmet recovery needs analysis as the best available data for purposes of this application. These data also form the basis for understanding the extent of the populations impacted as a result of recent disasters. While they are not necessarily predictive of populations that may be impacted in future events, they will

inform the analyses and modeling conducted by the State in framing its future vulnerabilities and hazards.

These data display the unmet recovery and rebuilding needs of the State and its counties as a whole, and demonstrate that of impacted populations, those with low- and moderate-income, limited English proficiency, functional needs, the elderly, or isolated are disproportionately burdened by the effects of these disasters. The State’s approach to recovery and rebuilding is grounded by this understanding of vulnerable populations, and the State will continue to address the specific needs of these populations in its current and future rebuilding and recovery efforts.

As discussed in Exhibit E (pages 56-61) and Attachment D (pages 96-111), in addition to establishing disaster impacts and unmet recovery needs in APA8, the State engaged in extensive outreach to state agencies, eligible counties, and other stakeholders to identify unmet recovery needs for this Phase 1 application. As such, this narrative reflects NDRC-specific input that stakeholders have contributed via survey submissions and other mechanisms.

It is critical to note that the State can identify additional target areas in Phase 2 of the NDRC application. The State will continue to work with all relevant stakeholders—especially Declared counties¹—to assess both new and existing data that might establish additional target

¹ In Appendix B of the NDRC NOFA, HUD designated 50 counties across the State as Declared (i.e. counties receiving a Federal Disaster Declaration from 2011 to 2013) and therefore eligible for consideration as part of this Phase 1 application. Of those 50 counties, HUD designated 15 counties as Most Impacted and Distressed and another 29 sub-county Census Tracts and/or Places within 11 Declared counties as Most Impacted and Distressed. As per HUD, Tribal Areas located with Most Impacted and Distressed counties are eligible for consideration as part of this

areas for inclusion in the Phase 2 application. In order to be considered as an NDRC target area, the county or sub-county area must meet: 1) Most Impacted threshold criteria, 2) Distressed threshold criteria, and 3) unmet recovery needs threshold criteria. Regardless, the solutions the State intends to develop will be scalable and replicable outside of the target areas introduced above.

The State is committed to meeting all of the threshold requirements per the NDRC NOFA. Should the State advance to Phase 2, the State will ensure that all proposed activities meet a national objective, are eligible activities, incorporate resilience activities as outline in the NOFA, and have a clear tie back to the disaster which qualified the target area. The State understands that the overall, over 50% of CDBG-DR funds must meet the national objective of benefiting low- and moderate-income individuals. These threshold requirements will be further detailed in Phase 2 as the activities are refined and presented to HUD per the NOFA requirements. As Part of this Phase 1 application, the State is submitting CBDG-NDR Application Certifications in Attachment C (pages 90-93). New York State meets all of the applicable requirements of the General Section in addition to the requirements of the NDRC NOFA.

Economic Revitalization Unmet Recovery Needs

The State has identified continuing unmet economic revitalization recovery needs due to Superstorm Sandy, Hurricane Irene, and Tropical Storm Lee in Most Impacted and Distressed

Phase 1 application, and Tribal Areas located within Declared counties are automatically deemed Distressed, though not Most Impacted.

areas that cannot be addressed with existing resources. To meet the unmet needs thresholds outlined in Appendix G, the State has identified a minimum of five businesses with remaining repair needs. As discussed below, the extensive and continued outreach conducted in the administration of the NY Rising Small Business Recovery Program meets the following data source requirements outlined in the NOFA's Appendix G: a windshield survey showing a minimum of five businesses with remaining unmet repair needs; a survey of at least five business owners confirming damage due to the disaster and repairs not completed due to not receiving adequate resources; and the recorded addresses of those businesses.

Launched in spring 2013, the NY Rising Small Business Recovery Program was established to serve eligible small businesses impacted by Superstorm Sandy, Hurricane Irene, and Tropical Storm Lee. Tens of thousands of businesses were located in Census Tracts with greater than one foot of flooding during Superstorm Sandy. These businesses suffered physical damage or, at minimum, were closed for extended periods of time due to power outages and limited transportation networks. As of December 2014, over 3,000 businesses submitted applications to the program and are at various stages of review or approval in the application process. Approximately 700 applications have been approved for grant assistance to date. The program currently remains open for new applications.

The Governor's Office of Storm Recovery (GOSR) executed subrecipient agreements with a statewide network of Small Business Development Centers (SBDCs) through the State University of New York (SUNY) to assist in the administration of the program. In addition, the State engaged the Empire State Development Corporation to conduct additional outreach for the program. The State's extensive SBDC network is uniquely positioned to provide both initial

outreach and on-going technical assistance to storm-impacted businesses. Every applicant to the Small Business Recovery Program undergoes four levels of review:

- An *initial review* by the SBDC Business Advisor (BA), who is located in the field and works directly with the business applicant as the primary point of contact. The BA works closely with the applicant in person and over the phone throughout the application process. This includes a site visit.
- A *second level of review* by the SBDC Case Manager Lead who performs a QA/QC of the BA's work prior to submitting the file to GOSR for final underwriting.
- An *initial underwriting* by a GOSR Underwriter and support staff. This review includes, but is not limited to an anti-fraud, waste, and abuse (AFWA) check, duplication of benefits verification, confirmation of proof of damage, and the review for reasonableness of eligible expenses.
- A *final review* by GOSR management for compliance with program policies and procedures.

The program performs one or all of the following additional reviews in assessing applicants requesting construction-related assistance:

- Estimated Cost of Repair (ECR) and Allowable Activities (AA) Third Party Damage Inspection: Per program policies and procedures, all applicants seeking construction assistance for future or past repair and/or mitigation work are required to have a damage assessment from the program's vendor. The damage assessment provides a valuation of the damages suffered by the business and also

either calculates the value of the work already completed or calculates the value of the work to be completed.

- **Third Party Environmental Checklist:** Per program policies and procedures, all applicants seeking construction-related assistance are required to comply with all HUD environmental requirements, as outlined in 24 CFR Part 58. The environmental review (ERR Cat Ex A) for construction activities includes a site visit and the completion of an on-site National Environmental Policy Act checklist, which is carried out by the Program’s vendor.
- **BA Site Visit:** if the BA or GOSR determines that additional verification is needed to confirm the level of damage and outstanding recovery needs, a site visit with the business applicant to tour the impacted business location will be scheduled.

In cases where there is insufficient evidence of a site visit or windshield survey based on the criteria above, the State has conducted additional site visits and communicated with the business to confirm that there are continuing unmet needs.

Through a review of applicant files, ongoing technical assistance, and site visits, the State has identified continuing unmet economic recovery needs in the target areas outlined below. In summary, for the purposes of meeting the unmet economic revitalization recovery needs threshold for this Phase 1 application, the State presents data to demonstrate that small businesses have been subject to at least one site visit to validate damage and establish remaining unmet needs. Based on available HUD guidance, the State is confident that these inspections and verification procedures surpass a standard definition of a windshield survey in methodological

rigor—and therefore meet—the data source guidelines outlined in Appendix G to demonstrate unmet economic revitalization recovery needs.

Infrastructure Unmet Recovery Needs

The State has identified continuing unmet infrastructure recovery needs due to Superstorm Sandy, Hurricane Irene, and Tropical Storm Lee in the Most Impacted and Distressed target areas that cannot be addressed with existing resources. To meet the unmet needs thresholds outlined in Appendix G, the State has identified quantified damage (i.e. FEMA Category C to G) that remains unrepaired as a result of inadequate resources. The State presents FEMA project worksheets with the estimated damage and repair amounts and unfunded repair needs to establish a minimum of \$400,000 in permanent unfunded infrastructure repair need and to describe the location and damage of the permanent public infrastructure relative to the location of the Most Impacted and Distressed target area. In the following narrative, the State indicates through a sources and uses document if there is no current source of funding for the projects associated with the worksheets.

Target Areas

Greene County

Most Impacted and Distressed

HUD has designated Greene County a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene and Superstorm Sandy). For this Phase 1 application, the State designates the entire county as a target area.

Greene County, located west of the Hudson River between Kingston and Albany, was severely impacted by Hurricane Irene and Tropical Storm Lee. In total, almost 1,000 owner-

occupied and renter occupied housing units were damaged in the county. Of these, over 500 were defined as low- and moderate-income households. These data were collected by the State over recent months and they combine data from FEMA and the Small Business Administration as well as programmatic data collected during the recovery phase. Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.²

In addition to the damage caused to the county’s housing stock, the State estimated that the county suffered significant business disruption. In all, 120 loan applications were received by the Small Business Administration, of which 68.3% were denied for various reasons—signifying a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

To demonstrate that this Most Impacted and Distressed area meets the Unmet Recovery Needs Threshold per the NOFA, the State is using data collected in the area of *economic revitalization*.

In this target area, the State can identify seven businesses in the NY Rising Small Business Recovery Program showing continued unmet recovery need with no source of funding available or indicated. This surpasses the minimum criteria of five businesses. Supporting documentation for these small businesses is provided as part of the State’s supportive data and according to the requirements of Appendix G, I. A (1) is located on the State’s FTP site, in a file titled “Greene Supporting Data,” available here:

² Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#/. Supporting documentation indicates whether the business received a visit from a SBDC representative, went through an ECR or ERR Cat Ex A visit and/or AA visit. These businesses have all been verified with site visits and duplication of benefits assessments. They continue to have unmet construction, repair, machinery and equipment, and/or mitigation needs. If documentation is lacking for one of these businesses, the State conducted an additional windshield survey for the purpose of this Phase 1 application. Because each of the businesses identified have hit their cap as per the program policies and procedures, their unmet recovery needs currently have no source of funding. As such, this target area continues to have unmet recovery needs at the time of this Phase 1 application.

Nassau County

Most Impacted and Distressed

HUD has designated Nassau County as a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene and Superstorm Sandy). In this Phase 1 application, the State designates the entire county as a target area.

Nassau County, situated on western portion of Long Island, was one of the most severely impacted counties as a result of Hurricane Irene and Superstorm Sandy. In APA8, the State estimated that over 50,000 housing units were damaged, including 6,000 severely damaged units in the 100-year flood plain. Of the 50,000 damaged units, over 21,700 were defined as low- and moderate-income households, as per the methodology outlined in APA8. These data were collected by the State over recent months; they combine data from FEMA and the Small Business Administration, as well as programmatic data collected during the recovery phase.

Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.³

In addition to the damage caused to the county’s housing stock, the State estimated that the county suffered significant business disruption. Over 23,000 small businesses were in a Census Block that received a foot or more of flooding; almost 7,000 were in the actual flood zone, as defined by APA8. In all, over 600 loan applications were received by the Small Business Administration, of which 53.8% were denied for various reasons—signifying a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

In order to display that this Most Impacted and Distressed County meets the Unmet Recovery Needs Threshold, the State is using data collected in the area of *infrastructure*.

In this application, the State is providing the FEMA Project Worksheet associated with the Vegetation Management Program on behalf of the Long Island Power Authority (LIPA), (HUD Matrix Code: 03-Other Public Facilities and Improvements; PW: PA-02-NY-4085-PW-00367(3)). Project worksheets (PWs), as well as the sources and uses statement, are provided as part of the State’s supportive data, and according to the requirements of Appendix G, I. A(1), is located on the State’s FTP site in a file titled “Nassau and Suffolk Supporting Data,” available here: https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#/.

LIPA’s retail electric system provides electric service to over 1.1 million customers in Nassau

³ Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

and Suffolk counties and the Rockaway Peninsula in Queens. This customer base represents 99% of the total possible customers on Long Island. In the aftermath of Superstorm Sandy, thousands of those customers were left without power for weeks. All 12 of LIPA's substations on the South Shore of Long Island sustained flood damage.

After Superstorm Sandy, LIPA undertook substantial reconstruction and resilience efforts (e.g. storm hardening measures, including installation of flood prevention barriers, elevation of equipment and adjustments to switching systems etc.) The State, through GOSR, is providing an \$80 million match to FEMA's \$1.4 billion in funds to upgrade LIPA's network. Planned improvements include a new outage management system and other technology upgrades to identify power outages and rapidly restore power. Funding will also be used to repair substations and electrical distribution systems.

However, LIPA also plans to spend \$729 million of its total federal and State assistance and insurance proceeds on mitigation measures to protect against future storms, such as strengthening lines and elevating equipment. These additional unmet recovery needs require a local match in excess of \$60 million. At present, no funding sources have been identified for addressing these needs. As such, this represents an unfunded unmet need well in excess of the \$400,000 threshold required for Nassau County.

Schoharie County

Most Impacted and Distressed

HUD has designated Schoharie County a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene and the remnants of Tropical Storm Lee). For this Phase 1 application, the State designates the entire county as a target area.

Schoharie County, situated in the Mohawk Valley, was severely impacted by Hurricane Irene and Tropical Storm Lee. In APA8, the State estimated that nearly 1,200 housing units were damaged in the county. Of these damaged units, over 700 were defined as low- and moderate-income households, as per the methodology outlined in APA8. These data were collected by the State over recent months; they combine data from FEMA and the Small Business Administration, as well as programmatic data collected during the recovery phase. Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.⁴

In addition to the damage caused to the county's housing stock, the State estimated that the county suffered significant business disruption. In all, 120 loan applications were received by the Small Business Administration, of which 68.3% were denied for various reasons—signifying a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

In order to display that this Most Impacted and Distressed County meets the Unmet Recovery Needs Threshold, the State is using data collected in the area of *economic revitalization*.

In this target area, the State can identify eight businesses in the NY Rising Small Business Recovery Program showing continued unmet recovery need with no source of funding available or indicated. This surpasses the minimum criteria of five businesses. Supporting documentation for these small businesses is provided as part of the State's supportive data and

⁴ Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

according to the requirements of Appendix G, I. A (I) is located on the State’s FTP site, in a file titled “Schoharie Supporting Data,” available here:

https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#/. Supporting documentation indicates whether the business received a visit from a SBDC representative, went through an ECR or ERR Cat Ex A visit and/or AA visit. If documentation is lacking for one of these businesses, the State conducted an additional windshield survey.

These businesses have all been verified through site visits and duplication of benefits assessments. They continue to have unmet construction, repair, machinery and equipment, and/or mitigation needs. However, because they have hit their cap as per the program policies and procedures, their unmet recovery needs currently have no source of funding. As such, this target area continues to have unmet recovery needs at the time of this application.

Suffolk County

Most Impacted and Distressed

HUD has designated Suffolk County a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene, Superstorm Sandy, and severe winter storm and snowstorm from February 8, 2013 through February 9, 2013). In this Phase 1 application, the State designates the entire county as a target area.

Suffolk County, situated on the easternmost portion of Long Island, was one of the counties most heavily impacted by Hurricane Irene and Superstorm Sandy. In APA8, the State estimated that over 15,000 housing units were damaged, including 1,500 severely damaged units in the 100-year flood plain. Of these 15,000 damaged units, over 7,000 were defined as being occupied by low- and moderate-income households, as per the methodology outlined in APA8.

These data were collected by the State over recent months; they combine data from FEMA and the Small Business Administration, as well as programmatic data collected during the recovery phase. Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.⁵

In addition to the damage caused to the county’s housing stock, the State estimated that the county suffered significant business disruption. Almost 1,000 small businesses were in a census block that experienced a foot or more of flooding during Superstorm Sandy. In all, over 600 loan applications were received by the Small Business Administration, of which 53.8% were denied for various reasons—signifying a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

In order to display that Suffolk County meets the Unmet Recovery Needs Threshold, the State is using data collected in the area of *infrastructure*. As previously discussed in Nassau County’s threshold narrative, the State is providing the FEMA Project Worksheet associated with the Vegetation Management Program on behalf of LIPA, which demonstrates an unmet recovery need of over \$60 million, which is well in excess of the \$400,000 threshold required for both Nassau and Suffolk Counties. See Nassau County subsection above for complete narrative. Supporting documentation through PWs as well as the sources and uses statement are provided as part of the State’s supportive data and, according to the requirements of Appendix G, I. A (1),

⁵Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

are located on the State’s FTP site in a file titled “Nassau and Suffolk Supporting Data,” available here: https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#/.

Tioga County

Most Impacted and Distressed

HUD has designated Tioga County a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (severe storms, flooding, tornadoes from April 26, 2011 through May 8, 2011 and the remnants of Tropical Storm Lee). In this Phase 1 application, the State designates the entire county as a target area.

Tioga County, situated in the Southern Tier of New York, was severely impacted by Tropical Storm Lee. In APA8, the State estimated that over 2,400 housing units were damaged in the county. Of these damaged units, over 1,100 were defined as being occupied by low- and moderate-income households, as per the methodology outlined in APA8. These data were collected by the State over recent months. They combine data from FEMA and the Small Business Administration, as well as programmatic data collected during the recovery phase. Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.⁶

In addition to the damage caused to the county’s housing stock, the State estimated that the county suffered significant business disruption. In all, 155 loan applications were received by the Small Business Administration, of which 45.8% were denied for various reasons—signifying

⁶ Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

In order to display that this Most Impacted and Distressed County meets the Unmet Recovery Needs Threshold, the State is using data collected in the area of *economic revitalization*.

In this target area, the State has identified six businesses in the Small Business Recovery Program showing continued unmet recovery need with no source of funding available or indicated. This surpasses the minimum criteria of five businesses. Supporting documentation for these small businesses is provided as part of the State’s supportive data and according to the requirements of Appendix G, I. A (1), is located on the State’s FTP site, in a file titled “Tioga Supporting Data,” available here: https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#. Supporting documents indicate whether the business in the target area received a visit from a SBDC representative, went through an ECR or ERR Cat Ex A visit and/or AA visit. If, documentation is lacking for one of these businesses, the State conducted an additional windshield survey.

These businesses have all been verified with site visits and duplication of benefits assessments. They continue to have unmet construction, repair, machinery and equipment, and/or mitigation needs. Because each business identified has hit its cap as per the program policies and procedures, its unmet recovery needs currently have no source of funding. As such, this target area continues to have unmet recovery needs at the time of this application.

Westchester County

Most Impacted and Distressed

HUD has designated Westchester County a Most Impacted and Distressed area for the purposes of the NDRC as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene and Superstorm Sandy). In this Phase 1 application, the State designates the entire county as a target area.

Westchester County, situated just north of New York City, was one of the most impacted counties as a result of Hurricane Irene and Superstorm Sandy. In APA8, the State estimated that nearly 3,000 housing units were damaged in the county. Of these damaged units, almost 1,200 were defined being occupied by low- and moderate-income households, as per the methodology outlined in APA8. These data were collected by the State over the last number of months; they combine data from FEMA and the Small Business Administration, as well as programmatic data collected during the recovery phase. Complete tables outlining damage at the county and municipal level are outlined in Appendix B of APA8.⁷

In addition to the damage caused to the county's housing stock, the State estimated that the county suffered significant business disruption. Over 1,700 small businesses were in a Census Block with a foot or more of flooding and over 130 were in the flood zone, as defined in APA8. In all, 129 loan applications were received by the Small Business Administration, of which 70.5% were denied for various reasons, signifying a continued unmet need in the county in terms of business needs, as per the methodology outlined in APA8 (also outlined in Appendix B of APA8).

Unmet Recovery Needs

⁷Appendix B of APA8 is accessible through the following link:

http://stormrecovery.ny.gov/sites/default/files/uploads/apa8_appendix.pdf.

In order to display that this Most Impacted and Distressed County has continued unmet needs and meets the Unmet Recovery Needs Threshold, the State is using data collected in the area of *infrastructure*.

As a result of Hurricane Irene and Superstorm Sandy, Westchester County has incurred almost \$4 million dollars in permanent damage (FEMA Categories C-G). PWs are provided as part of the State’s supportive data and, according to the requirements of Appendix G, I.A(1), are located on the State’s FTP site, in a file titled “Westchester County Supporting Data,” available here: https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/_layouts/15/start.aspx#. At present, no funding sources have been identified for addressing these needs. As such, this represents an unfunded unmet need of \$592,000—well in excess of the \$400,000 threshold required for Westchester County.

New York City (Five Counties)

The State of New York and City of New York (City) have closely collaborated to identify and highlight the unmet recovery needs for all five counties of New York City (Bronx, Kings, New York, Queens, and Richmond). These counties were designated by HUD as Most Impacted and Distressed areas as a result of federally declared disasters from 2011 through 2013 (Hurricane Irene and Superstorm Sandy). In this Phase 1 application, the State designates all five counties as target areas. Given the collaboration between the State and City, the narrative outlined below, in fulfillment of the unmet recovery needs requirements of this competition, closely mirrors the language used in the City’s Phase 1 NDRC application.

For the NDRC Phase 1 application purposes, the City is using data from the New York City Housing Authority (NYCHA) to demonstrate over \$439 million in unmet recovery needs

and data from the New York City Department of Housing Preservation and Development (HPD) to demonstrate a further \$77.3 million in unmet recovery needs under the NDRC.

Along with the City, the State is submitting proof of these unmet needs as part of the State’s supportive data. Supporting data are provided according to the requirements of Appendix G, I.A(1), and are located on the State’s FTP site in a file titled “New York City Supporting Data,” available here: [https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/ layouts/15/start.aspx#/.](https://nysemail.sharepoint.com/sites/NYSGOSR-Ext/ndrc/layouts/15/start.aspx#/)

Unmet Recovery Needs

In order to display that each of New York City’s five counties have continued unmet needs and meets the Unmet Recovery Needs (URN) Threshold, the State is using data collected in the area of *housing*. For the purposes of the HUD NDRC Phase 1 application, the URN for housing for all five target areas totals \$516.7 million (see file referenced above).

Public Housing

NYCHA is demonstrating over \$439 million in combined URN across all five of the target areas (Bronx, Kings, New York, Queens, Richmond) as the result of Superstorm Sandy, DR-4085.

These numbers are not intended to represent all of the City’s or NYCHA’s unmet needs, rather, just the ones identified for the purpose of supporting the NDRC Phase 1 MID-URN threshold requirement. Prior CDBG-DR funding allocations, together with other funding sources including, but not limited to, insurance, City, State, and FEMA funds (\$3,454,883,000 – see NYCHA_8-Detailed_Accounting_by_Development) are inadequate for addressing remaining housing repair needs (\$3,894,300,274 – see NYCHA_1-Overview-Costs_and_Funding).

All of the NYCHA sites where URN has been identified are Sandy-damaged properties.

NYCHA had over 400 buildings with over 35,000 residential units, housing nearly 80,000 residents affected by DR-4085. The sites and buildings were inundated with rain, experienced wind-born debris damage, storm surge and wide-spread power outages that left residents without critical elevator and trash compactor service. Hurricane Sandy posed a significant threat to the health and safety for NYCHA residents.

A critical element in NYCHA's recovery and the overall effort to preserve public housing, is to ensure that the infrastructure replaced, is replaced in a manner that reduces the risk of equipment damage in future storms and minimizes the impact on the City's most vulnerable populations. Although a combination of funding sources (FEMA PA, CDBG-DR and insurance both private and NFIP) have been identified to cover repairs and some mitigation measures (captured within the FEMA PWs), it is not enough to pay for additional resiliency measures identified herein as URN. These resiliency measures would provide back-up power for 179 buildings across 51 developments in Bronx County and fund surge/stormwater protection for 12 developments in Kings County, 16 developments in New York County, seven developments in Queens County and one development in Richmond County. NYCHA does not anticipate that any of the existing FEMA, CDBG-DR or insurance funds will pay for the nearly \$440 million of planned resiliency measures identified as URN. To show URN in each county, NYCHA has selected one FEMA PW from each county that details the scope of work being paid for by FEMA, insurance (including commercial and NFIP) and CDBG-DR. Correspondingly, the costs for the proposed resiliency measures are attached to prove that there is no scope/cost overlap between what is funded and what is being identified as URN.

NYCHA Supporting Document List

NYCHA 1-Overview-Costs and Funding: Overview of NYCHA DR-4085 repair estimates and identified funding (current as of January, 2015) for DR-4085 damages. Because the FEMA PWs are not final, neither costs nor funding numbers are final. \$3,894,300, 274 costs identified, \$3,454,883,000 funding identified, \$439,417,274 identified URN.

NYCHA 2A-Bronx FEMA PW: Bronx County FEMA Project Worksheet (PW) #02848(0). This FEMA PW was selected to show no scope/cost overlap between repairs covered by FEMA/insurance/CDBG-DR and URN resiliency measures. This document includes an itemized list of the developments and building count (179) for each that are captured in the PW.

NYCHA 2B-Bronx Resiliency Costs: Bronx County building resiliency measures cost estimate identified as URN. This is a spreadsheet estimate of the costs associated with installing back-up power generators on the 179 buildings in the Bronx identified in NYCHA 2A. This estimate methodology is based on the total number of buildings identified in PW02848(0), using R S Means Costworks 1st Quarter 2015, using Union Labor Costs. These line items are assembly costs based on assemblies approved by FEMA for NYCHA estimating. The estimate was prepared by Cliff Thompson, CM PM, Certified Estimator working for CB&I.

NYCHA 3A-B: (A) Demonstrates an overview of estimates for costs to provide combination surge and stormwater protection systems for 34 NYCHA developments that sustained DR-4085 damages from storm surge flooding in Kings, New York, Queens and Richmond Counties. (B) Spreadsheet that shows a per/site breakdown of the resiliency feature costs for Kings, New York, Queens and Richmond Counties and a signed letter from Future Proof stating estimating qualifications and methodology. The estimate was prepared by Prisca Terven Weems, MArch, MSc, LEED AP, Managing Partner of Future Proof.

NYCHA 4A-Kings FEMA PW: Sample Kings County site FEMA PW - Coney Island Houses 4&5. This FEMA PW was selected to show no scope/cost overlap between repairs covered by FEMA/Insurance/CDBG-DR and URN resiliency measures.

NYCHA 4B-Kings Resiliency Costs: Sample Kings County site resiliency measures cost estimate identified as URN.

NYCHA 5A-New York County FEMA PW: Sample New York County site FEMA PW – Rangel Houses. This FEMA PW was selected to show no scope/cost overlap between repairs covered by FEMA/Insurance/CDBG-DR and URN resiliency measures.

NYCHA 5B-New York Resiliency Costs: Sample New York County site resiliency measures cost estimate identified as URN.

NYCHA 6A-Queens FEMA PW: Sample Queens County site FEMA PW – Astoria Houses. This FEMA PW was selected to show no scope/cost overlap between repairs covered by FEMA/Insurance/CDBG-DR and URN resiliency measures.

NYCHA 6B-Queens County Resiliency Costs: Sample Queens County site resiliency measures cost estimate identified as URN.

NYCHA 7A-Richmond FEMA PW: Sample Richmond County site FEMA PW – New Lane Houses. This FEMA PW was selected to show no scope/cost overlap between repairs covered by FEMA/Insurance/CDBG-DR and URN resiliency measures.

NYCHA 7B-Richmond Resiliency Costs: Sample Richmond County site resiliency measures cost estimate identified as URN.

NYCHA 8-Detailed Accounting by Development: A breakdown by development of the DR-4085 repair estimates and identified funding (current as of January, 2015) for DR-4085 damages. Because the FEMA PWs are not final, neither costs nor funding numbers are final. These costs

reflect those costs being captured in the FEMA PWs and do not include the proposed resiliency measures identified as URN.

Multi-Family Housing

For purposes of this Phase 1 application, the New York City Department of Housing Preservation and Development (HPD) is demonstrating \$77.3 million in URN, and is submitting proof of URN for the MID designated counties of New York City (see “New York City Supporting Data” file referenced above).

In the aftermath of Superstorm Sandy, the City developed the Multi-Family Build it Back (BiB) Repair Program to address multi-family buildings in the 100-year floodplain that were in need of storm-related repairs and vulnerable to future storm events. The BiB Repair Program addresses limited resiliency retrofits such as raising electrical equipment where feasible, but it is not structured to pursue comprehensive resiliency assessments and scopes of work such as flood-proofing or installing redundant building systems, which require more complex analysis from engineers and technical experts.

To address this gap in resources for multi-family resiliency and protection measures, the City’s CDBG-DR Action Plan includes the Residential Building Mitigation Program (RBMP), which allocates \$60 million for comprehensive resiliency retrofit measures necessary to protect vulnerable residents from loss of critical building services in the event of a storm. However, the RBMP does not provide adequate funding to benefit all vulnerable, majority low- and moderate-income (LMI) buildings in the 100-year floodplain. BiB has identified a total of 133 multi-family buildings housing primarily LMI residents (66%) as candidates for comprehensive resiliency retrofits. Based on current data, the existing \$60 million in CDBG-DR funding allocated to BiB resiliency retrofits is expected to serve approximately 38 of the 133 buildings. These 38

buildings are all classified as majority-LMI. Using current cost projections for resiliency retrofits based on building size, we estimate that an additional \$77.3 million is required to fund comprehensive retrofits for the remaining 95 buildings housing LMI residents. Because most of the 95 buildings targeted for the additional \$77.3 million are smaller in size than those to be served by the existing \$60 million, less funding is required per building for retrofit measures.