

## LOWER MANHATTAN DEVELOPMENT CORPORATION

IN COOPERATION WITH  
THE STATE OF NEW YORK AND  
THE CITY OF NEW YORK

### PARTIAL ACTION PLAN

The Lower Manhattan Development Corporation (LMDC) has prepared the following Partial Action Plan with respect to the \$2 billion federal appropriation to LMDC through the United States Department of Housing and Urban Development (HUD). This plan details the proposed expenditure of \$316 million for the following items:

1. Housing Assistance Program totaling up to \$290.5 million.
2. Employment Training Assistance Program totaling up to \$10 million.
3. Design and installation of the interim memorial for victims of the September 11<sup>th</sup> World Trade Center tragedy and the 1993 World Trade Center bombing totaling up to \$350,000.
4. Planning, administration, and overhead costs totaling up to \$15.1 million.

Any change greater than 5% in the funding committed to a particular activity (a.k.a. program) identified in this Partial Action Plan, the addition or deletion of any activity, or change in the planned beneficiaries of an activity will constitute a substantial amendment and such amendment will be made available for public comment and approval by HUD.

Future partial action plans will detail the projected expenditure of the remainder of funds available from the \$2 billion appropriation and will be subject to a public comment period with later submission to HUD.

<b>Action Plan Categories</b>	<b>Allocation from \$2 billion</b>
Housing Assistance Program	\$290,500,000
Employment Training Assistance Program	\$10,000,000
Design and Installation of Interim Memorial	\$350,000
Administration and Planning	\$15,042,500
<b>Total</b>	<b>\$315,892,500</b>

#### **National Objective**

The activities contained in this Partial Action Plan have been designed to meet community development needs following September 11<sup>th</sup> having particular urgency because LMDC has determined that existing conditions pose a serious and immediate threat to the health or welfare of the City of New York and other financial resources are not available to meet such needs. The geographic areas that will be the focus of this and future partial action plans are located in Manhattan, below Houston Street, with particular urgency related to the areas in and around the former World Trade Center.

## **Public Notice and Comment**

The Draft Assistance Plan for Individuals, which included the initial criteria for both the housing assistance and job training components of this proposed Partial Action Plan, was made available to the public for a 20-day comment period starting on February 21, 2002. The Draft Assistance Plan was translated into Chinese and Spanish. LMDC placed advertisements inviting public comment on the draft plan in all major New York City English, Spanish, and Chinese-language daily newspapers and weekly community newspapers serving lower Manhattan. In addition, the text of the draft plan was made available on LMDC's web site ([www.renewnyc.com](http://www.renewnyc.com)), the Empire State Development Corporation's (ESDC) web site ([www.nylovesbiz.com](http://www.nylovesbiz.com)), and other web sites. Written comments were accepted via mail, e-mail, and in person. Over 1,100 individual comments were received along with more than 20 comments submitted by organizations and public officials. The overwhelming majority of comments received were related to the initial criteria for the Housing Assistance Program.

Based on a thorough review of the comments by a committee of the LMDC Board of Directors, the full Board adopted a draft Partial Action Plan on April 9, 2002, which incorporated the Draft Assistance Plan for Individuals, as amended. The draft Partial Action Plan was once again made available for public review and comment from April 9 through April 23, 2002. Notices of the draft Partial Action Plan, inviting public comment, were placed in all the major New York City English, Spanish, and Chinese-language daily newspapers. In addition, the draft Partial Action Plan was made available at LMDC's and ESDC's web sites and at other web sites as well as LMDC's offices and other locations. LMDC received approximately 215 comments from individuals along with additional comments from a small number of public officials and organizations. Once again, written comments were accepted via mail, e-mail, and in person. Nearly all comments received pertained exclusively to the Housing Assistance Program.

The responses to comments received during the respective comment periods have been incorporated into this proposed Partial Action Plan and are reviewed in section V below.



## PARTIAL ACTION PLAN

This Proposed Partial Action Plan acknowledges the affected communities in close proximity to the former World Trade Center and offers several forms of assistance to individuals affected by the September 11<sup>th</sup> disaster. First, the plan proposes a Housing Assistance Program that recognizes the extended hardship and quality-of-life disruption suffered by individual residents of lower Manhattan since September 11<sup>th</sup>. In addition, the Housing Assistance Program creates economic incentives for individuals and families to rent, purchase, or remain in housing in the designated downtown Manhattan areas. Second, the plan proposes a Job Training Assistance Program that provides job training assistance to affected individuals to help prepare them for employment at companies in lower Manhattan. Third, the plan proposes expenditures related to an interim memorial derived from a damaged work of art retrieved from the disaster site that serves to provide comfort and common commemorative ground for the victims and survivors of the attacks on the World Trade Center on September 11<sup>th</sup> and in 1993. Lastly, the plan proposes expenditures related to the planning, coordination, and administration of disaster recovery and remembrance efforts as well as rebuilding, redevelopment, and revitalization efforts in lower Manhattan.

The Plan seeks federal funding from HUD and acknowledges that an array of government and private sector programs have already been established to provide assistance to individuals. It does not attempt to provide assistance for needs that are already being met through such sources. Instead, it focuses on those forms of residential and job-training assistance that are not currently available.

### **Other Assistance Programs**

For information on existing individual aid programs, please contact the Federal Emergency Management Agency (FEMA) at 1-800-462-9029 (TTY for the speech- or hearing-impaired: 1-800-462-7585). FEMA's web site, [www.fema.gov](http://www.fema.gov), offers information on assistance available. Programs for individuals impacted by the September 11<sup>th</sup> tragedy include:

#### ***Government Programs***

**Victim Compensation Fund.** The fund provides economic compensation to families and dependents of victims of the September 11<sup>th</sup> tragedy in lieu of pursuing a civil case for damages. The program is intended to provide victims' families with compensation equal to the likely lifetime earnings of the victim and for pain and suffering without the delay normally encountered in seeking damages through the judicial system. Payments from collateral sources, such as insurance and pensions, are deducted from the calculated amount before distribution to the claimant.

**Housing Assistance.** FEMA's Disaster Housing Program makes funds and services available to individuals whose homes are uninhabitable because of a disaster. Funding has been provided to affected households for alternate rental housing and to clean residences.

**Low-Interest Loans.** The Small Business Administration (SBA) offers low interest loans to eligible individuals to repair or replace damaged property and personal belongings not covered by insurance.

**Cash grants.** A maximum grant of \$14,800 (adjusted annually for inflation) is available under the state-administered Individual and Family Grant program. Individuals who do not qualify for a loan from the SBA may be eligible for these grants from the state to recover unmet necessary expenses and serious needs, including medical, dental, and funeral expenses that are incurred as a result of the disaster. FEMA funds 75% of the grant program's eligible costs with the remaining 25% of the program's eligible costs provided by the state.

**Veterans Benefits.** The Department of Veterans' Affairs provides death benefits, pensions, insurance settlements, and adjustments to home mortgages for veterans.

**Tax Refunds.** The Internal Revenue Service allows certain casualty losses to be deducted on federal income tax returns for the year of the loss or through an immediate amendment to the previous year's return.

**Unemployment Benefits.** Disaster unemployment assistance and unemployment insurance benefits are funded by the United States Department of Labor and distributed through the state unemployment office. Individuals receiving such unemployment benefits may also receive retraining vouchers worth \$4,000 to enhance their employability.

### *Private Sector Programs*

Private charities have collected approximately \$2 billion to assist individuals affected by the disaster. These charities provide funds to the families of victims, as well as assistance to those living or working in the area who suffered as a result of the World Trade Center disaster. Among the charities providing assistance are:

**The American Red Cross**, as of March 11, 2002, received \$930 million in contributions, \$558 million of which has already been disbursed. The Red Cross provided:

- \$169 million in direct assistance to 3,266 families of the deceased and seriously injured;
- \$270 million to 51,000 families of displaced workers, residents, and disaster workers; and
- \$94 million in immediate disaster relief that has provided 14 million meals, mental health services for 232,000 people, and health services for 129,000 people.<sup>1</sup>

**The September 11<sup>th</sup> Fund** of the United Way of New York City and the New York Community Trust has raised \$470 million for assistance to victims, families, and communities. Groups supported by the September 11<sup>th</sup> Fund include:

- Victims & Families - 92%

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<sup>1</sup> Source: "American Red Cross" web site, April 26, 2002.



- Cash Assistance - 86% (\$206 million)
- Other Services - 6% (\$13.5 million)
  
- Community Organizations - 7%
  - Services - 1% (\$2.3 million)
  - Loans/Grants - 6% (\$13.5 million)
  
- Rescue/Recovery - 1%
  - Cash Reimbursement (\$2.7 million)<sup>2</sup>

**The Twin Towers Fund** has collected approximately \$150 million to provide assistance to families of uniformed services members who lost their lives as a result of the disaster. The fund provides: surviving spouses, \$75,000; next of kin where no surviving spouse is present, \$50,000; surviving children aged 23 or younger, \$25,000; and surviving children aged 24 or older, \$10,000. All heads of household (surviving spouses) will receive additional \$10,000 payments.<sup>3</sup>

**The New York State World Trade Center Relief Fund** raised more than \$56 million to assist families of victims of the World Trade Center Disaster. The fund provides grants of:

- \$10,000 to surviving spouses and domestic partners;
- \$5,000 to surviving children age 21 or younger and those older than 21 who received at least 50% of their financial support from the victim;
- Parents of victims where no surviving spouse, domestic partner, or children are eligible for an award receive \$10,000; and
- Other individuals receiving at least 50% of their financial support from the victim, where there is no other eligible survivor receive \$10,000.

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<sup>2</sup> Source: "The September 11<sup>th</sup> Fund" web site, April 26, 2002.

<sup>3</sup> Source: "Twin Towers Fund" web site, April 26, 2002.

## **I. Housing Assistance Program**

### ***Background***

The World Trade Center disaster had an immediate negative impact on the housing market in lower Manhattan, which resulted in a significant increase in vacancy rates. The residents of lower Manhattan, particularly in the area south of Chambers Street and west of Nassau and Broad Streets including Battery Park City (“Zone 1”), face a number of concerns regarding the effects of the tragedy such as quality of life issues, transportation issues, and the disruption caused by ongoing construction that will be necessary to rebuild lower Manhattan. As part of the recovery process, the economic impact of many of these issues is being addressed through existing grant programs administered by FEMA, as well as recovery efforts by other Federal, State, and City agencies. Unfortunately, when the initial criteria for this program were first introduced, the lower Manhattan housing market remained depressed despite the efforts that were being made in the area.

The United States Housing Market Conditions Regional Activity Report issued by HUD reported that lower Manhattan rental rates were down approximately 10 to 15%. After September 11, 2001, approximately one-third of Battery Park City rental tenants did not return to their apartments.<sup>4</sup> Some rental prices fell 30 percent in Battery Park City<sup>5</sup> and rents in the Financial District fell from 16 to 21 percent on average.<sup>6</sup>

Owner-occupied housing saw a similar downturn in the aftermath of the tragedy. Real estate agents estimated a 10 percent to more than 25 percent drop in apartment prices between September and December 2001.<sup>7</sup> By January, very few units had sold in Battery Park City while some were still listed at 15 percent below September prices.<sup>8</sup>

### ***Purpose of Program***

Lower Manhattan’s residential population is essential to the continued viability of the area’s businesses. Increased housing vacancy rates have a significant negative impact on the area’s economic recovery. Increasing vacancies in the rental and owner-occupied housing markets begin a downward economic cycle, reducing business activity, which in turn makes housing in the area less attractive.

Development of an effective program to encourage individuals to remain in, or move to, housing in lower Manhattan requires the creation of significant incentives to encourage individuals to renew existing leases, sign new lease agreements, or purchase residential units. Without such a program, the perceived disadvantages of lower Manhattan as a housing location would continue to adversely impact the area’s housing market and commercial activity.

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<sup>4</sup> “New Residents Moving to Lower Manhattan,” *Montreal Gazette*, March 26, 2002, page B5.

<sup>5</sup> “As Economy Slumps, Even Manhattan Rents Fall,” *New York Times*, December 20, 2001, page 1.

<sup>6</sup> “An Eerie Opportunity to Live on Wall Street,” *The International Herald Tribune*, December 16, 2001.

<sup>7</sup> “An Eerie Opportunity to Live on Wall Street,” *The International Herald Tribune*, December 16, 2001.

<sup>8</sup> “Residential Housing Sales Appear to be Rebounding in Manhattan,” *The Wall Street Journal*, January 7, 2002.



The incentive program outlined in this Partial Action Plan meets these goals. Response to the Draft Assistance Plan for Individuals first announced in February was immediate and positive. Although Battery Park City's occupancy rate fell to 60% after the disaster,<sup>9</sup> its occupancy rate "rose by several percentage points, to 74 percent," a few weeks after the Draft Assistance Plan for Individuals was released for public comment.<sup>10</sup> In general, anecdotal evidence from building owners and prospective tenants shows that, after the plan was announced, there was a substantial increase in interest in apartments in the lower Manhattan area.

### *Area Characteristics*

The population of the area south of Canal Street is diverse. Approximately half of the area's residents live within walking distance of their place of employment. Residential income characteristics reflect the area's industry mix, which includes a significant number of financial service businesses, small manufacturers (including garment producers), restaurants, retailers, and providers of professional and personal services. For example, residents of the area east of Broadway and south of Canal Street have a median household income that is lower than the area west of Broadway, which is characterized by relatively high household incomes.<sup>11</sup>

The area of lower Manhattan adjacent to the World Trade Center was attractive to urban professionals because of the presence of the major transportation hub at the World Trade Center and major shopping and service areas located at the World Trade Center and the World Financial Center. These attributes were complimented by the presence of attractive residential units in locations like Battery Park City and Tribeca. In Tribeca alone, more than 5,000 units were converted to housing from other purposes in the 1990's.

The areas of Chinatown, Little Italy, and parts of the Lower East Side have historically been a major residential entry point for immigrants in New York City and include predominantly lower and middle income households. While parts of this area are not south of Canal Street, this area experienced significant inconvenience, disruption, and economic hardship as a result of September 11<sup>th</sup>.<sup>12</sup>

### *Criteria for Assistance*

This program offers substantial financial incentives to offset the perceived and real disadvantages of living in lower Manhattan. To encourage individuals to sign or renew leases or purchase or retain housing, in lower Manhattan, the following categories of grants are proposed:

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<sup>9</sup> "New Residents Moving to Lower Manhattan," *Montreal Gazette*, March 26, 2002, page B5.

<sup>10</sup> "Lure of Grants Draws Tenants to Areas Hurt by Attack," *New York Times*, March 12, 2002, page B1.

<sup>11</sup> The area east of Broadway and South of Canal Street has a median household income of \$40,000, below the Metropolitan Statistical Area median family income of \$62,800. In contrast, the median household income for the entire area west of Broadway and South of Canal Street (the area closest to the attack site) was approximately \$125,000.

<sup>12</sup> "Chinatown After September 11<sup>th</sup>: An Economic Impact Study," Asian American Federation of New York, April 2002, p. A11.

**Two-Year Commitment-Based Grants: Items 1 – 6**

*These grants provide an incentive to individuals to make a two-year commitment to lower Manhattan. This two-year commitment by residents stabilizes the residential communities adversely impacted by the September 11<sup>th</sup> tragedy.*

1. Rental units and owner occupied housing within Zone 1 (Zone 1 is defined as the area south of Chambers Street and west of Nassau and Broad Streets, including all buildings which face on those streets and the entirety of Battery Park City) will be eligible for a grant of 30% of the monthly rent (or mortgage payments, plus maintenance costs and real estate and related taxes for owner occupied units), up to \$12,000 over two years. To provide maximum benefit to lower income individuals in the area, the Plan provides a minimum grant of \$4,000 per assisted unit over two years. However, no residents will receive grants in excess of their total two year payments.
2. Rental units and owner occupied housing within Zone 2 (Zone 2 is defined as the area outside Zone 1 but south of Canal Street and southwest of Rutgers Street, including all buildings which face on those streets) will be eligible for a grant of 30% of the monthly rent (or mortgage payments, plus maintenance costs and real estate and related taxes for owner occupied units), up to \$6,000 over two years. To provide maximum benefit to lower income individuals in the area, the Plan provides a minimum grant of \$2,000 per assisted unit over two years. However, no residents will receive grants in excess of their total two year payments.
3. To be eligible for the grants related to rental units described in Items 1 & 2, all applicants must meet the following criteria:
  - The unit must be occupied by the applicant and the applicant must comply with one of the following two options:
    - (a) The applicant must have entered into at least a two-year lease commencing prior to July 1, 2002 and ending on or after May 31, 2003; or
    - (b) The applicant must have entered into at least a two-year lease commencing on or after July 1, 2002 and on or before May 31, 2003.
  - To be eligible for the program under option (b), the following rent restrictions apply:
    - Rents paid by tenants in rent-regulated units may not be more than the legally permitted rents for rent-regulated units.
    - Rents paid by tenants in non-rent-regulated units may not be more than the following:



- In Zone 1 -- 90% of pre-9/11/01 rents for the same rental unit, plus an adjustment equal to the level of rent increases set for two-year renewal leases by the New York City Rent Guidelines Board.
  - In Zone 2 -- 95% of pre-9/11/01 rents for the same rental unit, plus an adjustment equal to the level of rent increases set for two-year renewal leases by the New York City Rent Guidelines Board.
  - These rent restrictions do not apply to newly constructed units coming on line after September 11, 2001 or to units whose rent-regulation status changed or will change between September 11, 2001 and June 1, 2003.
  - Going forward, these rent restrictions may be adjusted to reflect market conditions.
  - Leases of existing tenants where the term of the lease is or has been renegotiated will only be eligible if their term expires at least two years after the effective date of the renegotiated lease or at least two years after the date the renegotiated lease was executed, whichever is later.
  - Tenants must show that their rental payments are up to date (or have otherwise been lawfully placed in escrow).
  - Payments under the program will be made directly to eligible tenants for up to two years.
  - One grant will be made per housing unit.
  - Additional eligibility criteria regarding health, safety, and habitability of buildings may be applied to this program.
4. To be eligible for the grants related to owner occupied housing described in Items 1 & 2, all applicants must meet the following criteria:
- The unit must be occupied by the owner applicant and the owner applicant must comply with one of the following two options:
    - (a) Existing owners must agree to remain for at least two years after July 1, 2002; or
    - (b) New owners who purchase on or after July 1, 2002 and on or before May 31, 2003 must agree to remain for at least two years.
  - Only owner-occupied residences will be eligible for assistance. Owners who lease out their residences will not be eligible for this assistance, but their tenants will be eligible if they satisfy the criteria set forth in Item 3. See Item 5 for possible exceptions.

- Existing owners who have completed the payment of their mortgages will be eligible for a grant of 50% of monthly maintenance costs and real estate and related taxes, up to the maximum amounts of \$12,000 or \$6,000 over two years.
  - Owners must show that mortgage, maintenance, and real estate and related tax payments are up to date (or have otherwise been lawfully placed in escrow).
  - Payments under the program will be made directly to eligible owners for up to two years.
  - One grant will be made per housing unit.
  - Additional eligibility criteria regarding health, safety, and habitability of buildings may be applied to this program.
5. Units leased or owned for residential purposes by corporations, universities, and other designated institutions may be subject to special criteria. These units will only be eligible for the grants described in Item 1 and Item 2.
  6. LMDC will determine whether buildings are in compliance with the criteria of this program (i.e. offering two-year leases and complying with the rent restrictions outlined in Item 3), before its housing units will be deemed eligible. This certification process may vary for certain subsets or categories of buildings.

**One-Time Grant Per Housing Unit for September 11, 2001 Residents: Item 7**

*These grants compensate residents of lower Manhattan who have continued to live in the area since September 11<sup>th</sup>. These grants recognize the value of their commitment to remain in lower Manhattan despite the significant inconvenience, disruption, and economic hardship that these areas have sustained since September 11<sup>th</sup>. Their continued residence has supported the immediate and surrounding residential and business communities during this period.*

7. A one-time grant of \$1,000 is available per currently occupied housing unit in Zone 1, Zone 2, or Zone 3 (Zone 3 is defined as: the area north of Canal Street and Rutgers Street; south of Delancey and Kenmare Streets; and east of Lafayette Street in Manhattan, including all buildings which face on those streets with the exception of Canal Street and Rutgers Street). Applicants for this one-time grant must have resided in rental units or owner occupied housing in Zone 1, Zone 2, or Zone 3 prior to September 11, 2001 and continue to reside in Zone 1, Zone 2, or Zone 3 through the date of application and the date of award. Residents who relocated within or between the eligible zones will be eligible for this grant.

**One-Time Grant Per Housing Unit for Families: Items 8 - 10**

*These grants provide an incentive to families to make at least a one-year commitment to live in lower Manhattan, recognizing that keeping and attracting families is crucial to the stability and vitality of lower Manhattan.*

8. Eligible rental units and owner occupied housing within Zone 1 whose household includes one or more children under age 18 at the date of their application will be eligible for an



additional family grant of \$1,500. One grant will be made per housing unit. The additional eligibility criteria for these grants are described in Item 10.

9. Eligible rental units and owner occupied housing within Zone 2 and Zone 3 whose household includes one or more children under age 18 at the date of their application will be eligible for an additional family grant of \$750. One grant will be made per housing unit. The additional eligibility criteria for these grants are described in Item 10.

10. To be eligible for the family grants described in Items 8 & 9, all applicants must meet the following criteria:

- The unit must be occupied by the applicant and the identified child(ren) and the applicant must comply with one of the following four options:
  - (a) The applicant must have entered into at least a two-year lease commencing prior to June 1, 2002 and ending on or after May 31, 2003; or
  - (b) The applicant must have entered into at least a one-year lease commencing on or after June 1, 2002 and on or before May 31, 2003; or
  - (c) Existing owners must agree to remain for at least one year after June 1, 2002; or
  - (d) New owners who purchase on or after June 1, 2002 and on or before May 31, 2003 must agree to remain for at least one year.

#### **Supplemental Assistance: Items 11 & 12**

11. LMDC may assist subrecipients, including specified state agencies and/or authorities, by giving them the authority to disperse money to compensate owners of residential property for loss of access and services, on property owned by such agency and/or authority, as a direct result of the events of September 11<sup>th</sup>. Projected cost: up to \$10 million.

12. Abatements and subsidies for the same purpose as the grants in this program will be factored into the determination of eligibility and the calculation of grant amounts for all types of grants.

#### ***Program Estimates***

Estimated number of units included in the program:

- Housing units in Zone 1: 9,361
- Housing units in Zone 2: 22,052
- Housing units in Zone 3: 16,141

Estimated program cost: Up to approximately \$290,500,000.

***Administration of the Housing Assistance Program***

LMDC will contract with one or more entities to provide administrative services in connection with this Housing Assistance Program. The program administrator(s) and the LMDC staff will establish specific guidelines for the program based on the criteria for the Housing Assistance Program in this proposed Partial Action Plan.



## **II. Employment Training Assistance Program**

### ***Background***

An array of job training programs is being provided through existing workforce development programs to help individuals affected by September 11<sup>th</sup> obtain basic skills needed for employment in the New York City area. For example, New York State has received a \$25 million National Emergency Grant from the federal government to provide job training, placement services, career counseling, resume preparation, and access to job banks to individuals impacted by the tragedy. The grant, provided through the New York State Department of Labor to 14 organizations offering these services, will help workers dislocated as a result of the tragedy transition back into the workforce.

In addition, unemployed individuals can receive training vouchers valued at \$5,000 through the Workforce Investment Act for training that prepares them for jobs that are in occupations in high demand.

However, to be effective in specific employment settings, new and existing employees often require specific skills not taught in traditional classroom training programs. The customized training needed by individuals for their particular jobs involves special preparation, often in on-the-job settings in the use of proprietary work or production techniques.

### ***Plan for Assistance***

This program will provide grants to train current and prospective employees of businesses and not-for-profit organizations in the area south of 14<sup>th</sup> Street. Such grants will prioritize individuals affected by September 11<sup>th</sup>, specifically individuals who lost wages and worked below Houston Street on September 11<sup>th</sup>, providing them with the skills they need to succeed at the specific work processes found at those businesses.

1. Assistance will be in the form of grants to businesses and not-for-profit organizations south of 14<sup>th</sup> Street. These grants will be used for training and retraining for skills specific to the needs of these businesses, not-for-profit organizations, and employees.
2. Eligible firms must employ fewer than 500 people.
3. The maximum benefit will be 50% of eligible training costs.
4. Groups of small firms (so-called training consortia) will be eligible applicants, and could receive a fee of up to 5% of training costs for administration.
5. Up to \$10 million will be allocated through this program.
6. This program will provide assistance to approximately 5,000 individuals.<sup>13</sup>

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<sup>13</sup> ESD estimate

*Administration of the Employment Training Assistance Program*

The Employment Training Assistance Program will be administered by the Empire State Development Corporation.



### **III. Interim Memorial**

The Lower Manhattan Development Corporation will provide funding for the design and installation of the interim memorial for victims of the September 11<sup>th</sup> World Trade Center tragedy and the 1993 World Trade Center bombing. This use of funds benefits the health and welfare of all of the communities affected by the September 11<sup>th</sup> tragedy and the nation by providing a place where these communities can come together to remember and commemorate the victims of the attacks during this period of recovery and rebuilding.

The memorial is located in a section of historic Battery Park known as Eisenhower Mall, near Bowling Green and adjacent to Hope Garden. The centerpiece of the memorial is "The Sphere for Plaza Fountain," a monument to fostering world peace that sat atop a granite fountain in the center of the 5-acre World Trade Center Plaza. The Sphere is framed on either side by a row of trees and park benches.

The LMDC Board and staff worked closely with representatives of victims' families, area residents, and city and state officials to design the plan for the interim memorial and to identify an appropriate site. A team consisting of LMDC, city and state planners, engineers, and architects prepared the site and installed the interim memorial. Extensive preparation of the site was necessary to support The Sphere. Preparation of the site included landscaping, the installation of decorative stones, and the construction of structural supports to hold The Sphere in place.

Program cost is up to \$350,000.

#### **IV. Planning and Administration**

With the creation of the LMDC in December 2001, New York State and the City of New York established a coordinating vehicle for recovery, remembrance, and rebuilding efforts in lower Manhattan. LMDC has secured facilities and staff that will provide planning, administration, and management services related to those efforts as well as the development of plans for the revitalization of the areas immediately surrounding the site of the September 11<sup>th</sup> tragedy. The initial set of basic principles and guidelines for LMDC's planning efforts are embodied in a draft document entitled *Principles and Preliminary Blueprint for the Future of Lower Manhattan*, which has been made available for public consideration and comment. As part of its coordinated planning activities, LMDC has already made, and will continue to make, this and other information available to its eight advisory councils and to the public via the LMDC web site, [www.renewnyc.com](http://www.renewnyc.com). In addition, LMDC will oversee and monitor the program administration by others of the Housing Assistance Program and the Employment Training Assistance Program described in this Partial Action Plan. HUD has authorized the use of up to 5% of the proposed expenditure, equaling approximately \$15.1 million, for costs associated with these planning, administration, and management activities, which includes such additional items as outreach, overhead, and research.



## **V. Responses to Public Comments**

This section describes the comments received from the public following the release of two earlier drafts of this proposed Partial Action Plan. Section V.A. reflects the comments, modifications, and clarifications made to the initial criteria for the Housing Assistance Program presented in the Draft Assistance Plan for Individuals after the first public comment period from February 21 to March 13. Section V.B. details the comments and responses relating to the revised and renamed plan, the draft Partial Action Plan, after it was released for public comment from April 9 through April 23. Due to the further modifications to the plan, some of the answers in V.A. are different than those given in V.B. LMDC has made an effort to note responses that differ in the second response. Finally, Section V.C. details the comments received on the Employment Training Assistance Program and LMDC's responses.

### **A. Draft Assistance Plan for Individuals**

*Comment Period: February 21 through March 13, 2002*

#### ***Housing Assistance Program***

##### **1. Expressions of Support and Requests for Information**

*238 commenters expressed support for the housing assistance plan.*

No response needed.

*287 requested further information, and 102 inquired how to receive an application.*

LMDC's web site, [www.renewnyc.com](http://www.renewnyc.com), will have updates on the status of program administration. When the program has been fully approved and an application process established, it will be widely advertised in Manhattan. An outreach campaign will be implemented to reach eligible residents and potential residents.

##### **2. Geographic Expansion**

*Many comments received, both from individuals and public officials, expressed the desire for LMDC to broaden the geographic boundaries of the program. 169 commenters, more than half of all the comments received regarding geographic expansion, advocated that the boundary of Zone 1 be extended east to Nassau Street. Community Board 1 and Senator Martin Connor specifically made this request. State Assembly Speaker Silver and Manhattan Borough President Fields asked that LMDC expand the Immediate Impact Zone. Various buildings' tenant associations asked for the inclusion of their buildings. One commenter asked that LMDC not enlarge the zones, two others thought the zones were too large.*

In response to these comments, LMDC revised the plan to extend the eastern border of Zone 1 to Nassau Street, maintaining Chambers as the northern boundary and continuing south to the East River via Broad Street.

*Another 91 commenters proposed extensions north and east to various streets. A petition with 61 signatures from a housing complex northeast of Zone 1 requested their inclusion in that zone, as did comments from Assembly-member Deborah Glick and Senator Connor. Twenty commenters felt that areas north of Canal Street should be eligible for assistance. Specific requests were made by civic organizations such as MFY Legal Services and the Pratt Institute Center for Community and Environmental Development, and public officials such as Borough President Fields and Speaker Silver to include neighborhoods with a relatively high proportion of low- and middle-income residents.*

In response, LMDC decided to add a third zone of eligibility extending north of Canal to Delancey and Kenmare Streets with a western boundary of Lafayette Street. A one-time grant of \$1,000 per housing unit would be given to current residents who lived in this area on September 11<sup>th</sup>. This change addresses comments expressed that LMDC take into consideration low-income communities situated in parts of the Lower East Side, Chinatown, and Little Italy.

### **3. Family Grants**

*Commenters suggested that special consideration be given to families with children to recognize that keeping and attracting families is crucial to the stability and vitality of Lower Manhattan. Community Board 1, the Tribeca Organization (an ad hoc group of merchants and residents), and Manhattan Borough President Fields specifically made this request, as did members of the LMDC's Residents Advisory Council, a body consisting of representatives of lower Manhattan neighborhoods. One commenter asked specifically about reimbursement for childcare expenses.*

In response to these comments, the plan will now give a one-time bonus to eligible households with children – in Zone 1: \$1,500 per household; in Zone 2: \$750 per household.

### **4. Pre-9/11 Residents' Eligibility for \$1,000 Bonus**

*Under the original draft criteria, pre-9/11 residents would only be eligible for the \$1,000 bonus when they renewed their existing leases. Pre-9/11 residents who relocated within the zone would be ineligible. Assembly Speaker Silver and Community Board 1 requested that LMDC address this issue. Eight commenters specifically advocated this point as their main focus, and a number of additional commenters referenced the issue within a larger discussion. Some residents were forced to move due to physical damage. Others took advantage of high vacancy rates and moved within their buildings or within the zone. Whether or not they relocated, 9/11 residents might experience a time delay in receiving their benefits if they are required to wait for the renewal of their existing leases.*

The plan has been revised in response to these comments and will now award the \$1,000 grant to any resident who lived in the eligible zones on 9/11 and remains a resident in the eligible zones. An individual need not live in the same unit or building and his or her eligibility is not contingent upon signing a new lease. Pre-9/11 residents will be eligible for their \$1,000 bonuses upon presentation of a lease that is valid and active as of the commencement date of the program (and,



if necessary, another lease demonstrating their residency within the zone on 9/11). One grant will be made per current housing unit.

#### **5. Delayed Onset of Benefit**

*Some residents who signed a 2-year lease prior to 9/1/01 may have to wait as much as 18 months before becoming eligible for the benefit. This also applies to 9/11 residents who relocated. More than a dozen commenters expressed concern regarding the delay in receiving the benefit.*

LMDC has altered the criteria so that two-year or longer term leases commencing on or after 6/1/01 and before 7/1/02 will be eligible. This change will reduce the delay of eligibility for grants to a maximum of about a year for all residents of Zones 1 and 2 on September 11.

#### **6. Institutional Apartment Eligibility**

*The eligibility of housing units leased by universities, corporations and other institutions was unclear. New York University (NYU) submitted a comment explaining that they hold several long-term leases on buildings south of Canal Street that they sub-lease to their students, faculty, and staff. In the majority of these cases, it was not realistic for two-year leases to be offered. A similar situation exists with corporate apartments that have long-term leases and are occupied by multiple tenants over the course of two years. Comments from the Real Estate Board of New York and Furnished Quarters (a corporate housing enterprise) asked that these units be included.*

The program was revised to provide for special criteria for units leased and owned by corporations, universities, and other designated institutions. Eligibility is for the main subsidy and not for the pre-9/11 \$1,000 grant or the family bonus. The goals are to offer an incentive to corporations that may be making location decisions and relief to other downtown institutions.

#### **7. Ensuring that Rents are Not Raised in Response to the Subsidy**

*Twenty-one commenters who are renters have provided anecdotal evidence that landlords are planning to take or are taking unfair advantage of the grant program by raising rents in ways that limit the value of the LMDC payment. Example: Potential renters are being offered substantially different rental rates based on either one-year or two-year leases. One commenter stated that because his landlord is raising the rent to 100% of pre-9/11 rates – outweighing the value of the benefit to the tenant – he would end up paying more for the same apartment even after the subsidy. Community Board 1 proposed a rent level of 90% of pre-9/11 rates for eligibility. One commenter suggested calculating payments on pre-9/11 rents, while not imposing any limits on current rents. One commenter was opposed to any stipulations regarding rent levels.*

In order to ensure that rents do not rise unreasonably in response to the subsidy, eligibility is contingent upon rents in leases that commence after the start date of the program remaining at the following levels: Zone 1-90% of pre-9/11 rents; Zone 2: 95% of pre-9/11 rates. As stated in

the plan, LMDC may adjust these levels after the commencement of the program based on market conditions and other significant factors. Building eligibility is based on landlords' compliance with these rent levels and their willingness to offer two-year leases.

*(Note: Please see second comment response for updated information.)*

#### **8. Fairly Compensating Owners Who No Longer Make Mortgage Payments**

*Eleven commenters noted that property owners who have completed mortgage payments may be eligible for less than other residents under the draft plan's criteria.*

In response, LMDC will raise the grant for existing owners in this category to 50% of maintenance costs and taxes from the current 30% figure, while maintaining the cap at \$6,000 for Zone 2 and \$12,000 for Zone 1.

#### **9. Units Returning to the Market**

*The Real Estate Board of New York noted that units subject to vacancy deregulation (i.e., Gateway Plaza) and vacated rent stabilized units should not be held to the pre-9/11 rent clause (i.e. that rents remain at pre-9/11 levels).*

In response to these comments, the program was modified to state that the pre-9/11 restrictions "do not apply to newly constructed units, units subject to vacancy deregulation, and other rent regulated units that become unregulated."

*(Note: Please see second comment response for updated information.)*

#### **10. New Construction**

*New York City Housing Preservation and Development points out that there are residential buildings currently under construction that will be completed before 8/31/03. They asked that LMDC clarify these units' eligibility.*

In response to these comments, the program now states that the pre-9/11 restrictions "do not apply to newly constructed units, units subject to vacancy deregulation, and other rent regulated units that become unregulated."

*(Note: Please see second comment response for updated information.)*

#### **11. Owners' Loss of Value**

*Property values have dropped in the affected zones. Eight commenters felt the LMDC program needed to do more to address this concern, as did Speaker Silver.*



An important impetus for the creation of the housing assistance program was the decrease in residential property values. The goal of the program is to revitalize and stabilize the housing market, thereby restoring property values to pre-9/11 levels.

**12. Two-Year Lease Issues:**

*Thirty-six commenters noted that certain landlords refuse to sign two-year leases. Thirty-six separate commenters felt that the two year commitment was too long. Two commenters thought one-year leases should be eligible, as did Community Board 1, Borough President Fields and the Tribeca Organization. One commenter suggested that a current one-year lease plus a new one-year lease should be eligible. Congressman Jerrold Nadler proposed that an affidavit expressing intent to reside in Lower Manhattan for two years should be sufficient. Another commenter said that two years of residency should be sufficient and that the benefit should not be contingent on a lease.*

Two-year leases are a key component of the housing assistance program. The goal of the program is to encourage the neighborhood investment and stability that will result from an increase in two-year commitments – and two-year leases are the best available method of ensuring this commitment. The eligibility of buildings will be determined on the basis of criteria such as landlords’ compliance with the two-year lease provision.

**13. Additional 9/11-related Subsidies.**

*Prior to the enactment of the LMDC plan, other entities such as the Battery Park City Authority have offered rent abatements to their residents. Two commenters inquired about the overlap between the programs; one of these felt the BPCA abatements should not be subtracted from the LMDC grant.*

The LMDC program’s grant calculations may factor in abatements such as those offered by the Battery Park City Authority. In general, other abatements and subsidies may be factored into the determination of eligibility and the calculation of grant amounts.

*(Note: Please see second comment response for updated information.)*

**14. Dollar Amount of Maximum Grants**

*Forty-seven commenters said the maximum grant sizes (\$12,000 or \$6,000 over two years) are too small. Speaker Silver and Pratt Institute’s Center for Community and Environmental Development echoed this sentiment.*

In order to guarantee the minimum payment (\$4,000 or \$2,000) to low- and middle-income residents and other provisions of the plan, LMDC chose to set these maximum payments in order to maintain the financial feasibility of the program.

## **15. Health and Safety**

*Fifty-three commenters expressed concern about air quality, as did Councilmember Sanders and Good Old Lower East Side, a member of the Rebuilding with a Spotlight on the Poor Coalition. Some of the commenters thought extra money should be spent on ensuring the safety of the air and two believed that all buildings should be inspected and cleaned, if necessary. One commenter was opposed to the housing program and thought all the money should go to ensuring that the air in Lower Manhattan is safe.*

LMDC understands that, at both the local and national levels, taskforces have been established to address the air quality issue in lower Manhattan. The City of New York has recently established a Lower Manhattan Air Quality Task Force to address residents' concerns on this topic and has appointed a coordinator for these issues. The federal EPA has established a body to analyze and address these issues and has made announcements on this topic recently.

*Three commenters thought there should be a greater focus on health and safety. Two of these proposed more money for healthcare and one requested more focus on health and safety in general. One comment suggested additional payment for pain and suffering. MFY Legal Services, representing the Spotlight on the Poor Coalition, said there should be free healthcare for residents.*

These comments are beyond the scope of this plan. LMDC will take these points into account in crafting future programs or in working with other government agencies in the formation of their initiatives in these areas.

*Two commenters asked if additional assistance was being offered to disabled residents.*

The program does not specifically address this issue, but the guide to resources in the plan describes organizations that will help disabled residents.

## **16. More Focus on Quality of Life**

*Twelve commenters advocated that more resources should be dedicated to improving the quality of life for residents. Two of these comments referenced cleaning up lower Manhattan. Others proposed that more money be spent on amenities such as retail stores and restaurants. Additionally, ten commenters believed the money would be better spent on improving quality of life, supporting businesses, or financing schools. Community Board 1, Borough President Fields and the Tribeca Organization all suggested that more money be spent on neighborhood amenities.*

LMDC agrees that the amenities and institutions of Lower Manhattan must be strengthened in order to ensure its continuing livability and attractiveness. The housing assistance program, in coordination with business assistance programs administered by ESDC and the City of New York's Economic Development Corporation, is the beginning of a coordinated effort to improve life for Lower Manhattan residents. Supporting businesses in the neighborhood and reinforcing the stability of the real estate market will enable LMDC to focus on other community



improvements in the future. LMDC's advisory council structure will ensure that future projects correspond to the needs of Lower Manhattan's varied constituencies.

#### **17. Battery Park City Issue: Higher Benefit**

*Six residents of Battery Park City felt they deserved more money under the plan than other lower Manhattan Residents.*

The LMDC plan places Battery Park City in Zone 1. This makes BPC residents eligible for the maximum benefit the plan offers, higher than the residents of both Zone 2 and Zone 3.

#### **18. Battery Park City Issue: Reduction of Payments**

*Nine residents of Battery Park City suggested either reducing or eliminating their PILOT and ground rent payments. One demanded more control over the use of the proceeds from these payments.*

These comments are beyond the scope of this plan. The Battery Park City Authority is the administrative body to address regarding these concerns.

#### **19. Increase the One-Time Grant**

*Three comments suggested that the one-time \$1,000 grant be given out per resident rather than per housing unit. Three comments suggested that the one-time \$1,000 grant should be larger, even as large as \$10,000. Borough President Fields suggested \$5,000.*

The one-time \$1,000 grant recognizes the extended disruption and disturbance experienced by people who resided in the eligible zones on 9/11 and continue to live in the eligible zones. Within the budgetary constraints of the program, LMDC has chosen to devote greater resources to the payments that will be given out over the course of two years to increase and maintain neighborhood stability. This program aims to curtail these effects and improve the quality of life of existing residents through the creation, maintenance, and promotion of a stable residential community that will support improvements to the community.

#### **20. Taxes**

*Six comments proposed reductions in property taxes. One of these commenters was specifically concerned about rising property tax assessments. One commenter proposed an education tax credit, another proposed a reduction in city taxes in lieu of the LMDC grant program. Community Board 1 and the Tribeca Organization suggested implementing a sales tax holiday for a limited time in Lower Manhattan.*

Property taxes and other city taxes are outside the jurisdiction of the LMDC. The grant program being offered will be a much more timely benefit to residents than an effort to affect changes in the tax code.

## **21. Owner and Long-Term Resident Issues**

*Seventeen commenters felt that owners and long-term residents should receive more than renters and new residents. Twenty comments suggested that 9/11 residents deserve more than newcomers to Lower Manhattan. Two of these commenters thought the plan helped new residents more than current residents. Two others were opposed to offering incentives to renters at all, arguing that they would not enhance neighborhood stability.*

People residing in the eligible zones on September 11<sup>th</sup> may receive the \$1,000 one-time grant, while new residents will not. A primary objective of the LMDC program is the creation, maintenance, and promotion of a stable residential community. One way the program aims to accomplish this is through the attraction of new residents, both owners and renters, to lower Manhattan; therefore, the plan offers them the same benefit levels as current and long-term residents. FEMA and a number of private charities have been offering financial assistance to lower Manhattan residents since September. A listing of other resources available can be found in the preface to the LMDC plan.

*Sixteen comments requested that owners who lease-out their units be eligible for assistance.*

One of the goals of the LMDC program is to offer an incentive to renters to move to lower Manhattan, thereby aiding landlords who have been suffering from increased vacancy rates. A more stable rental market will aid landlords; LMDC will accomplish this by offering incentives directly to tenants, rather than to non-resident owners.

*Six comments proposed or inquired about help specifically for homebuyers.*

New homeowners will be eligible for the LMDC program pursuant to the criteria described in the plan.

*Three comments suggested offering subsidies for the development of new properties or the improvement of existing buildings.*

The goal of the LMDC grant program is to stabilize the lower Manhattan real estate market. New residential buildings are eligible for the program pursuant to the criteria in the plan. Capital improvements to lower Manhattan real estate is an activity the program hopes to stimulate.

*One commenter suggested having HUD or the SBA refinance the outstanding balance of mortgages in lower Manhattan; another commenter also suggested mortgage financing support.*

Owners are eligible for grants under the LMDC program.

## **22. 9/11 Resident Issues**

*Eight commenters asked that LMDC settle outstanding rent strikes. One comment asked that 9/11 residents be permitted to break their existing lease without penalty.*



LMDC has no control over leases between landlords and their tenants. Many tenants in lower Manhattan have been renegotiating rents for lower rates since September, a practice encouraged by the Real Estate Board of New York.

*One comment suggested that rents for 9/11 residents be kept at post-9/11 rates for two years.*

A goal of the program is that rental rates return to consistency with the rest of Manhattan, while at the same time offering financial assistance to residents who have suffered extended disruption.

*One comment asked what provisions were being made for residents forced to leave for medical reasons.*

The LMDC plan does not specifically address this issue, but the guide to resources in the plan describes organizations that will help residents with medical issues.

### **23. Rent Regulation and Lower Income Residents**

*Two comments suggested using rent stabilization as a means of assisting residents. One comment described concerns about a landlord ceasing the practice of voluntary adherence to rent stabilization. Three comments expressed concerns about housing units that would soon be losing regulated status. One comment asked about tenants forced to leave rent-regulated units.*

Rent regulated units are eligible for the LMDC program pursuant to the criteria in the plan. Concerns regarding specific rent regulation programs should be addressed to the agencies that administer them.

*Three comments felt that the grant should not be based on rent, two of these thought this was discriminatory. Councilman Sanders and Good Jobs New York proposed that the benefit be based on income. One comment stated that all grants should be equal. One commenter felt low-income residents are ignored, another specifically requested that they be included. Two others suggested limiting the grant to low- and middle-income residents. One commenter felt that people who can afford to buy a home shouldn't get assistance. Another suggested implementing citywide programs to assist low-income individuals. One comment requested that subsidized housing be eligible.*

The LMDC plan sets a minimum grant of either \$4,000 or \$2,000 in Zone 1 and Zone 2, respectively. The minimum grant exists specifically to assist lower income residents who would receive a negligible benefit if calculated on 30% of their monthly payment. In the revised plan, LMDC has expanded eligibility and will provide a benefit to neighborhoods north of Canal Street where there is a larger concentration of lower income New Yorkers. The LMDC includes all residents of lower Manhattan with the goal of promoting a stable residential population and in recognition of the disruption they have suffered, regardless of income level. All subsidized housing is eligible under the criteria of the LMDC plan.

## **24. Administration**

*Certain residents (loft tenants, rent-control tenants) pay rents that are extremely below market. In rare cases, the minimum benefit may exceed monthly tenant payments.*

In response to this issue, LMDC will limit the subsidy to the level that makes the tenant contribution \$0 – but no lower (i.e. no tenants will receive grants in excess of their own rent payments).

*Ten commenters urged that the program be run efficiently with a simple application process and that money be available soon. Four commenters asked for more information on the logistics of the administration.*

LMDC is currently in the process of planning the administration of this program. The current plan foresees a simple application process, local location(s) where residents may submit applications, the ability for residents to mail in applications, and a hotline to respond to questions.

*A number of comments suggested that people had misunderstood the criteria laid out in the draft plan.*

LMDC will provide clarifications and answers to frequently asked questions when the program is implemented. The revised plan has clarified details such as the fact that both sides of border streets are eligible for benefits as well as inserting clearer language concerning dates of eligibility (i.e. “on or before 6/1/03”).

*Three commenters asked for clarification concerning the “health, safety, and habitability” clause found in Item 5 of the plan. (Item 3 in the draft)*

Health, safety, and habitability will be factors in the certification of a building’s eligibility.

*Two commenters asked that the program be extended for longer than the two years currently proposed.*

LMDC does not anticipate extending the housing assistance program. It is hoped that two years will provide sufficient time for the lower Manhattan real estate market to stabilize, for vacancy rates to drop, and to offer meaningful benefits to residents.

*Six commenters inquired about the eligibility of units with no leases, i.e. lofts and rent controlled units.*

In certain limited cases, LMDC is considering processes under which it may permit proof of residency other than a lease.



*Seven commenters asked if the grants were taxable.*

This question is still under consideration by the taxing authorities.

*One commenter said it was difficult to find information on the LMDC program. Councilman Sanders stated he was unaware of any effort to distribute the plan in languages other than English.*

The Draft Assistance Plan for Individuals was made available to the public on February 21 for public review. Advertisements were placed in all major New York City English, Chinese, and Spanish-language daily newspapers as well as smaller newspapers serving communities in Lower Manhattan. The plan was translated into Chinese and Spanish. The text of the plan was made available in person and through LMDC's web site as well as other sites. Over 1,100 individual comments were received during the 20-day public comment period. LMDC's web site, [www.renewnyc.com](http://www.renewnyc.com), will continue to provide updates on the status of program administration. When the plan has been fully approved and an application process established, the Housing Assistance Program will be widely advertised in Lower Manhattan in English, Chinese, and Spanish.

*One commenter requested the inclusion of resident managers and superintendents who may not pay rent.*

These residents will be eligible for the one-time \$1,000 grant and the family bonus. They must meet the same criteria as all other residents. Other grants in the program are based on monthly rent or mortgage, maintenance, and tax payments without exception.

*Two commenters asked if foreign residents are eligible.*

Residents are eligible pursuant to HUD criteria.

*One commenter asked that we consider giving grants per resident rather than per unit.*

The program is structured to award grants per housing unit, regardless of the number of residents. Awarding grants per resident would exceed the budgetary constraints of the program.

## **25. Proposals, General Comments and Questions**

*Wall Street Rising, a merchant's association, has proposed a marketing campaign on the virtues of Living in Lower Manhattan.*

This proposal is outside the scope of the housing assistance program. LMDC accepts applications for funding through a separate process and reviews them accordingly.

*Pace University and one individual commenter requested special consideration for students.*

Students are eligible for the program pursuant to the same criteria as all other residents.

*One commenter felt that people developing the plan should live in Lower Manhattan.*

Lower Manhattan residents have been involved in all the stages of development of this program.

*One commenter proposed setting aside housing for members of the New York City Police and Fire Departments.*

This proposal is outside the scope of the housing assistance program.

*Six commenters voiced concern over issues such as bus traffic, construction noise and cable rates.*

These issues are outside the scope of the housing assistance program.

*One commenter offered a proposal on how to improve Battery Park City.*

This proposal is outside the scope of the housing assistance program.

*One commenter said that buildings with physical damage should get more money.*

Residents of such buildings are eligible for the program pursuant to the same criteria as all other residents.

*Two commenters requested improvements in transportation, while many noted the disruption in transportation since September 11. One commenter suggested an increase in bus service for Lower Manhattan. Another proposed subsidizing water taxi service for residents.*

Transportation is outside the scope of this program. Improvements to the transportation infrastructure in lower Manhattan are a key component of LMDC's continuing planning activities.

## **26. Proposals, Comments and Questions-Outside Scope of Individual Assistance**

*Twenty commenters inquired about business assistance.*

ESDC and New York City's EDC are the primary provider of business assistance programs to 9/11 affected businesses.

*22 comments offered suggestions on what structures should be built on the former World Trade Center Site.*

*16 residents of Battery Park City wrote stating their opposition to the previously proposed (and subsequently changed) location of a temporary memorial.*

*5 commenters were seeking employment.*

*5 were looking for general information on the LMDC or Lower Manhattan.*



*One commenter proposed giving Alan Gerson a formal role in the overall development process.*

*One commenter proposed opening social service centers in Lower Manhattan.*

These comments and proposals are outside the scope of the housing assistance program.

### List of Commenters

Abrams, Shirley  
Abramson, Steven  
Acarino, Danielle  
Adams, Cleveland  
Adams, Kelly  
Adnan, Dani  
Adoradio, Allison  
Aezen, Samantha  
Agnifilo, Karen Friedman  
Aguilera, Julia Sepulveda  
Alexander, Diane  
Alexander, Heidi  
Allen, Charles F.  
Allen, Kim  
Alm, Rick  
Alper, Jerry  
Alterman, Daniel L.  
Ambrosino, Arthur M.  
Amerkanian, Linda  
Andersen, Cecilia  
Anderson, Barney  
Andresen, Matt  
Andresen, Teri  
Andrew, Jason  
Andrus, Eric  
Anello, Christina  
Anglim, Kevin  
Ante, Spencer E.  
Apati, Monica  
Aponte, Ada  
Appolonia, Lisa  
Arango, Lazara  
Arena-Mastro Paolo, Joan  
Arlt, Kathy  
Arnette, Sharon  
Arroyo, Wanda  
Ashare, Raini  
Ashman, Anastasia  
Atnally, Richard  
Au, Jonathan  
Autz, Lisa  
Aylward, Ilonka  
Babich, Vanessa  
Bachand, Kathleen M.  
Bailey, Ruby  
Bain, Aron  
Baizan, Antonio  
Baker, Julia B.  
Balestriere, John  
Balestrieri, Peter  
Banh, Amanda  
Bannon, William  
Bansal, Rohit  
Barat. PhD, Kahar  
Baratta, Dorothy  
Barkan, Alexander  
Barnwell, Michael  
Baron, Estelle  
Baros, Tim  
Barshop, Douglas  
Bartsch, Anita  
Bastawros, Mary N.  
Basu, Ron  
Bauer, Alfred Y.  
Bauer, Annette  
Baum, Jamie A.  
Bawa, Alpana  
Beehler, Barbara A.  
Begun, Richard  
Ben-Ari, Daphne  
Bender, Michele  
Benedict, Derek E.  
Benfield, Angela  
Bennetti, Stephanie  
Benson, Irene  
Berg, Fraya  
Berkower, Elise  
Berla, Krissy  
Berlin, Douglas  
Berliner, Gerald  
Berman, Andrew  
Berman, Ben  
Berman, Jack  
Betancourt, Sarah  
Bhatt, Rita S.  
Bikel, Theodore  
Billig, Pamela  
Binder, Jeffrey  
Binham, Caroline  
Biondolillo, Thomas P.  
Bissmeyer, Michael  
Bitman, Craig A.  
Biundo, Elizabeth a.  
Blackwell, Donna  
Blech, Miriam  
Blevin, Jane  
Blisko, Paula  
Blue, Philip Y.  
Blum, Bill  
Bochert, Park  
Bodwell, Vicki Mote  
Bokuniewicz, Carol  
Booth, Stephen  
Borden, Brooke  
Borri, Gregg  
Borstad, Kristen P.  
Boyer, Lindsey A.  
Bracett, Vernon  
Bradley, Elizabeth  
Bratton, William  
Braunstein, Selma  
Bravman, Barry  
Brindisi, John  
Britton, Kathleen  
Brizzi, Thomas  
Brooks, Yvonne  
Browde, David  
Brown, Mike  
Browne, Jr., William S.  
Bruce, Judith  
Bruno, John  
Bruno, Joseph  
Bruno, Michelle  
Bruns, Arndt  
Bryant, Cory M.  
Bryant, Lori  
Bryant, S  
Buckner, David  
Burke, Adam  
Butorac, Gordana  
Butziger, Alexander M.  
Byrne, Ciara  
Byrne, James M.  
Calbi, Greg  
Callahan, Gina  
Caloyeras, Alik  
Campbell, Karen L.  
Cannon, Mark  
Capalbo, Martine  
Caporale, Emily  
Cappellano, Joan  
Caprino, Mariann  
Capurso, Mary  
Carbonara, Lisa  
Cardyn, Lisa  
Carideo, Debi  
Carreras, Leo J.  
Casper, Pamela  
Cassell, Peter  
Castro, Yvonne  
Catton, Clifford  
Cavusoglu, Sezin  
Ceballos, Wilmi R.  
Cesaria, Jenny  
Chan, M.M.  
Chan, Tony  
Chan, Yim Ngor  
Chan, Yuk Ting



Chang, Jason  
Charny, Sylvia Z.  
Cheng, Fai  
Chernock, Joseph  
Chernow, JoAnne  
Cheung, Fungyin  
Childers, Carol N.  
Chin, Ken  
Chmiel, Pamela  
Cho, Jay W.  
Chong, Sun Fat  
Chong, Susan  
Choudhury, Annette  
Chrisman, John  
Chu, Peter  
Chu, S.C. Arnold  
Chu, Whei  
Chui, Kai Min  
Chung, Anthony  
Chung, K. Leonard  
Ciabattoni, Steven  
Ciment, Mendel  
Claggett, Michael  
Clark, Abel  
Clark, Corine  
Clark, David  
Clark, Macquarie  
Cleary, Gail P.  
Co, Elaine  
Coffey, Barbara  
Coffey, Tom  
Cogshall, Jeffrey  
Cohen, Jeremy  
Cohen, Roger  
Cohen-Wolf, Marti Ann  
Coher, David  
Colaio, Vito  
Colalucci, Brian F.  
Colangelo, Kelly  
Colasacco, Colleen  
Cole, Dana  
Collins, Linda  
Collins, Mary Lou  
Colman, David  
Colombo, Renee  
Coluccio, Christian  
Colwin, Bruce  
Communiello, Patricia  
Cook, Jerred  
Cook, Wendy  
Cooney, Margret  
Cooper, Karen  
Corbin, Lori

Cordes, Robert  
Coriceprion, Lysia  
Cornell, Gail  
Costa, Salvatore P.  
Cote, Nell M.  
Courtney, Kerri  
Coury, Steven  
Cousins, Natalie  
Cowlin, Bruce  
Cox, Norman  
Cremens, Kevin  
Crespo, Judith  
Criscione, Fred  
Cronk, Elizabeth A.  
Cullen, Catherine  
Cummings, Michael  
Curbelo, Leo  
Curtin, Matt  
Curtis, Frances  
Cyborowski, James  
D'Agostino, Dolores  
Dahl, Julia  
Dallal, Marla  
Daly, Antonia  
Daly, Christopher  
Damato, Anthony  
Damions, Derrick  
D'Angelo, Nick  
Darer, Evelyn  
Davidson, Robert  
Davis, Rachel  
Davis, Seth  
Dean, Mary  
Decker, Wayne  
DeFrancesco, Denise  
Delcourt, Bernard  
D'Elia, Brett J.  
Dell, Heather  
Dembowski, David  
Demirel, Ersel  
Denes, Christen  
DeRosa, Chrisine  
Desmond, Colleen  
Desmond, Sarah  
Devoe, Milda M.  
Devoto, Horacio  
Diamond, Mitchell S.  
Diaz, Eddie  
Dierickx, Mary  
DiLoreto, Gaia  
Dinorcia, Matthew  
Doben, Elayne  
Doberman, Edward A.

Dodnick, Fred  
Dominguez, Elizabeth P.  
Doruk, Bige  
Dougherty, Steve  
Douthett, Catherine  
Drozdk, Orshi  
Duerr, Barbara A.  
Duffy, Anne-Marie  
Durante, Donald  
Duryea, Brian  
Dyson, James  
Ebersold, Danieliel Y.  
Eder, Sherla  
Ejsmont, Alexander  
Eliason, Amy  
Elliott, David  
Ellison, Richard  
Engelbreacht, Kate  
Engler, Laura  
Enriquez, Melissa  
Epelbaum, Jennifer Turley  
Epstein, Louis  
Eskenazi, Rachel  
Fabian, Michael  
Fabricius, David  
Fahrer, David  
Falsone, R.  
Farha, Philip  
Fariello, Vittoria  
Farlow, Darren  
Farmiga, Adriana  
Fasnacht, Heide  
Faustino, Kathleen  
Fedonchik, Scott  
Feigan, Carly  
Feinberg, Martin L.  
Feinblum, Brian  
Feldman, Errol  
Fellner, Tmar E.  
Feng, Susan  
Fennlly, Glenn J.  
Fernandez, Elizabeth  
Fernandez-Serrano, Lucrecia  
Ferrara, Jane  
Filan, Mary T.  
Finci, David L.  
Fingeret, Brian  
Finkel, Sharen  
Fitzgerald, Linda  
Flamm, Peter  
Flanagan, Debbie  
Fleischman, Allan M.  
Flores, Nydia

Florman, Laura  
Fluss, Edward A.  
Fogle, Angela M.  
Fontanilla, David  
Fox, Jeremy  
Franchino, Charles  
Freedman, Beth  
Freeman, Robbin  
Friedman, Jillian  
Friedson, Donna  
Friman, Paul  
Fu, David  
Funderburk, Max H.  
Fusco, Toni  
Gabriel, Patricia  
Gallo, Daniela  
Galloway, Jeff  
Garcia, Frances  
Gardell, Tracey  
Gardner, John  
Garnett, Adam  
Garnett, Lucy  
Garraway, Selwyn  
Garton, Mary  
Gavito, Jennifer  
Gean, Sandra  
Gehorsam, Robert  
Giangola, Andrew  
Gibson, William  
Gillis, Colin W.  
Girand, Mark  
Glass, Catherin M.  
Glasser, Karen  
Glazer, Gene  
Glen, Nigel  
Glickman, Gail S.  
Glisson, Heather  
Goff, Robert  
Goldberg, Dorothy  
Goldberg, Leonard  
Goldman, Adam  
Goldstein, Joan  
Goldstein, Joshua  
Goldstein, Matthew  
Goldstein, Sharon  
Gomes, Filomena  
Gompertz, Fred  
Gonda, Christine  
Gonzalez, William J.  
Goodkind, Thomas S.  
Goodman, Cary  
Goodman, David  
Gordon, Bernice

Gordon, Marcy  
Gottlieb, Janet Graham  
Gottlieb, Theodore  
Gould, Larry  
Granado, David  
Grande, John  
Grassi, Michele A.  
Green, Jessica  
Green, Lyn  
Green, Phyllis  
Greenberg, Gary  
Greeno, J. Todd  
Greenstein, Bob  
Gregg, Joan  
Griffin, Scott  
Gritzinger, Shane  
Grochan, Kathryn  
Groeneveld, Jim  
Grossman, Anna  
Grove, Charmian  
Grubman, S  
Guberman, Norman  
Gudaitis, Peter  
Guglielmo, Albert  
Gunn, Ed  
Gupta, Udayan  
Guzman, Violet  
Guzzetta, Gregory  
Haas, Wolfgang  
Haber, Robert  
Habib, Charles J.  
Habib, Frances  
Hahn, Craig  
Haines, Elizabeth  
Hall, Kathleen H.  
Halpern, R.  
Hanlon, John  
Hans Jr., August E.  
Hansen, Kathy  
Harris, Christine  
Harrison, Mychal  
Harrison, Nate  
Hart, Cynthia  
Hatch, Jerri  
Hayes, Ryan Michael  
Hazelaar, Cor  
Helmerson, Karen  
Henry, J. Grant  
Herman, Ben  
Hertzberg, alyse  
Hever, Ilana  
Heyel, Amy  
Hill, Bryan

Hintz, Michael  
Hirschberg, Todd  
Hitchcock, John  
Hoa, Nickie  
Hodgkin, Carter  
Hoffman, Howard S.  
Hogans, Keisha  
Holguin, Jr., Eleodoro  
Holmes, Charise  
Hom, Albert  
Hom, Kenneth  
Horner, Julie  
Horowitz, Evelyn  
Hough, Bill  
Howard, Marilyn Gaull  
Howard, Tyler  
Howe, George E.  
Howe, Kevin  
Hung, Mike  
Hunt, Kenneth  
Hunter, Adam John  
Hupert, Nathaniel  
Hurtado, Luis Fernando Perez  
Hyson, Rosemary  
Iedbury, Michael  
Ihne, Ruth A.  
Imhoff, Sandy  
Inyard, James  
Ismirnioglou, Robert  
Ivler, Loren  
Jaber, Pamela  
Jacobson, Andy  
Jalili, H. Michael  
Jamilkowski, John  
Janecki, Antoinette  
Jason, Andrew  
Jedrlinic, Judith  
Jensen, Ruth  
Ji, Helen  
Joffee, Atara  
Johnson, Ailauna C.  
Johnson, Daniel A.  
Johnson, Erik S.  
Jones, Lisa  
Joseph, Maria  
Jossen, Stephanie Cassell  
Judge, Julia  
Jue, Henry  
Juhasz, Patty  
Jung, Ursila  
Kahanov, Learing  
Kahanov, Phoebe  
Kamps, Julie



Kanuri, Manohar  
Karim, Shwan  
Kaufman, Beatrice  
Kaufman, Frederick  
Kay, Jeff  
Keane, Kelly  
Keane, Marie  
Keany, Sutton  
Kefer, Paul J.  
Kefer, Ryan  
Keller, Brian  
Kelley, Laura  
Kelly, N.  
Kennedy, Justin D.  
Kiernan, Kathlene  
Kieves, Lawrence  
Kimmelman, Miriam  
Kimura, Miki  
King, Clifford A.  
King, Larry D.  
Kirk, Leo  
Kirsch, Lisa  
Klements, Jill  
Knaster, Suzanne  
Koethe, Amy M.  
Kohler, Jill  
Kohs, Daniel  
Konecna, Katka  
Kong, Myongsu  
Konopka, Julie  
Koo, Jeffrey L.  
Kozak, Susan J.  
Kozek, Bonnie L.  
Krebs, Carl  
Krueger, Sam Quan  
Krumholz, Beth  
Kruse, Douglas C.  
Kuhn, Lucy  
Kula, Lyle  
Kung, Jasmin  
Kuruvila, Bikku K.  
Kwan, Ed  
Kwasnicki, Barbara A.  
Kwong, Henry  
L., April  
Lacey, Lucille  
Lacucci, Tara  
Lam, Mabel  
Lam, Woon-Keung  
Lancaster, Baylor A.  
Lane, Cynthia  
Langhorne, Earnest  
Lansing, Mary Rose

Lariviere, Donald  
Larsen, T. Patrick  
Laspada, Tom  
Latham, Bradley  
Latham, Ruth  
Lavin, Kelley  
Law, Lawman  
Lawergren, Bo  
Lawlor, Mary Beth  
Leather, Maria E.  
Lee, Andy  
Lee, Charlie  
Lee, Charlotte C.  
Lee, Joanne  
Lee, Julius  
Lee, Ken  
Lee, Shew  
Lee, Sujin  
Lee, Tony  
Lehane, Colleen  
Leibowitz, Irina  
Lelli, Larry  
Lenahan, Daniel V.  
Lenhardt, Anesta  
Leonard, Jeane  
Leonard, Kelly  
Lerner, Brad  
Lerner, Diane  
Lesser, Matthew  
Letsou, Thomas C.  
Leung, Patrick  
Leven, Adrienne J.  
Levey, Jamie  
Levin, Sherwood  
Levine, Bernard  
Levine, Denise  
Levine, Izzy  
Levine, Jay  
Levine, Marjorie  
Levinson, Janice Berman  
Levintow, Anthony  
Levitan, Leonard  
Levitt, Jill  
Lewis, Curtis  
Lewis, Marilyn  
Li, Karen  
Li, Vicky  
Liem, Ronald  
Lifshitz, Howard  
Lim, Catherine  
Lim, Lisa  
Lindsay, Nancy  
Lindo, Arthur S.

Lindsay, Roger R.  
Ling, Linda  
Liotto, Marie  
Liu, Jevons C.  
Liu, Shue Ming  
Livanis, Olga  
Lividini, Craig  
Lo, Susan  
Loader, Mark  
Loeser, Richard  
Logue, Brian  
Lombardi, Joseph  
Lonberg, Henrik R.  
London, William L.  
Lopez, John B.  
Loscalzo, Lydia M.  
Louie, Rita J.  
Lown, Aaron  
Loyd, Beth  
Lundgren, Annika  
Lurz, Robert J.  
Luther, Shawn  
M, Jane  
Machir, Stuart  
Mackay, Jonathan  
MacQuarrie, Kim  
Madorma, Francine A.  
Magliulo, Michael  
Magnusson, Stefan G.  
Mahoney, Janet S.  
Maiden, Tom  
Mainz, Mark  
Mannion, Loretta  
Manno, Karen  
Manos, Margaret  
Margiotta, Paul  
Mari, Anouchka  
Mariama, James  
Marsh, George  
Marshall, Eleanor  
Marte, Ann  
Martin, Evan  
Martinell, Tracy L.  
Marzullo, Kelly  
Massengill, David  
Matos, Ada  
Matson, Gary  
Mayer, Cynthia N.  
Mayesh, Stacey  
Mazer, Leslie  
McAllister-Sinnott, Moya  
McCall, Linda  
McCarthy, Deirdre

McClintock, Robin  
McCormack, Michael A.  
McElrath, Christine  
McGlynn, James  
McHugh, Megan  
McKee, Estee  
McKenzie, Sandra  
McNamara, Dedi  
McNamara, Tim  
McNeil, Elizabeth  
Meadow, Amy  
Meagher, Andrew  
Median, Jaime  
Medina, Luisa  
Meehan, Bill  
Mejia, Diana  
Meltzer, Tammy Ann  
Mendelow, Rob  
Mendez, Antonio  
Merghoub, Samir C.  
Mettle, Steven  
Miklos, Danielle  
Milius, Jason  
Milla, Eddie  
Miller, Allan  
Miller, Kenny  
Min, L. Talor  
Minelli, Robert  
Minsky, Barbara  
Mitchell, Seth A.  
Mitchell, Sharon  
Moch, Cheryl  
Mohl, Eric  
Molinelli, Maria  
Mollica, Peter  
Monaco, Joan  
Mongeot, Jacqueline  
Monjoy, Kim  
Montefusco, Anthony  
Montesione, Rob  
Montfort, Ofelia M.  
Moon, Jeffrey A.  
Morgan, Owain  
Mosbacher, Peter  
Moscaritolo, Ella  
Moser, Ben  
Moy, Mary Ann  
Muir, Robbi  
Mullan, Dan  
Mullin, Tricia  
Murphy, Deirdre  
Murphy, John  
Murphy, Mary Jo

Murphy, Sheila  
Musaian, Mariana  
Muthana, Dechu  
Myers, Scott  
Natrella, Elizabeth S.  
Neikirk, Victoria  
Nevraumont, Peter N.  
Newman, Catherin  
Newmark, Craig  
Ng, David  
Ng, Fay  
Nguyen, Tara  
Noiman, J.  
Nominikat, Elke  
Nordgren, Sandra  
Notaro, Anthony  
Noviello, Frank  
Oatman, Eric  
Ober, Lisamarie  
Oberliesen, Kirk  
O'Brien, Jamie A.  
O'Brien, Maureen  
O'Donnell, Steven  
Ogilvie, Peter  
O'Grady, Marijo  
Ojar, Shane  
O'King, Arthur  
Olivo, Elena  
Olson, Sabrina M.  
Omari, Zerouali  
O'Neill, Jr., Philip D.  
Ong, Melissa Zullo  
Orczyk, Dorota  
Ortega, Debra  
Osen, Sharon  
Ost, John  
Ost, Kelly  
O'Sullivan, May  
Overton, Leslie  
Oyarvide, Irwing  
Pacetti, James  
Padnani, Amy  
Page, Cristina  
Pak, Irene  
Palma, Mark G.  
Palusamy, Cindy  
Paolicelli, Anthony  
Paran, Dganit  
Parker, John  
Paterson, Arthur  
Pati, Toni  
Pede, Lawrence  
Peifer, Patricia

Pellathy, Louis  
Perez, Elsa  
Perez, Michelle  
Peri, Vincent  
Perillo, Mary  
Perla, Susan  
Persaud, Anthony  
Pershan, Julia  
Pertose, Ron  
Pestone, Carol  
Peterson, Doug  
Phipps, Elena  
Piccin, Susan  
Pietrangolare, Anthony  
Pizzo, Anna  
Plendner, Ilona  
Polifronio, Tracy  
Porta, Robert  
Post, Karen  
Powers, Caroline C.  
Powers, Steve  
Presley, Kevin  
Quines, Alan  
Raffle, Cary  
Ramos, Gloria  
Rand, Elizabeth  
Rao, Joe  
Reeber, Patricia  
Reeves, Natalie L.  
Regan, Michael FX  
Regelson, Esther  
Renda, Catherine  
Reoch, Karen  
Repeta, Barbara  
Rhei, Nancy  
Rice, Eric  
Richardson, Virginia M.  
Richberg, Mauri  
Richman, Abraham  
Riedel, Sandra  
Rigg, Cynthia  
Ritter, Maria Z.  
Rivernider, Cynthia  
Roberts, Corey C.  
Roberts Jr., John E.  
Robinson, Maryse  
Robinson, Mensah  
Rodriguez, Reinaldo  
Rogers, Kevin  
Rohan, Christopher  
Roig, Emma  
Roina, Angela  
Rome, Sterling



Romo, Mike  
Ronser, Eric  
Rosen, Scott  
Rosen, Stacey  
Rosenberg, Ben  
Rosenberg, Jennifer S.  
Rosenberg, Ken  
Rosenthal, Steven  
Rosillo, Sal  
Rosner, Eric  
Ross, Avidan  
Ross, Kathleen  
Ross, Lynn  
Ross, Ray  
Ross, Rob  
Rothbloom, Richard  
Rotter, Ann  
Rubinfien, Leo  
Rudolph, Mark  
Ruffino, Debra  
Russo, Alyce  
Russo, Bridget  
Russo, Helena  
Ryan, Raymond F.  
Ryan, Ronald J.  
Sabulis, John  
Saez, annemarie  
Saffer, Rhona  
Saieva, Frances  
Salameh, Majida  
Salzberg, Adele  
Sama, Gabriel  
Samet, Jessica  
Sanborn, Cheryl  
Sanchis, Luis  
Santoro, Mike  
Sarajian, Michael  
Satanovsky, Simon  
Sauberman, Joshua  
Schaeffer, Rebecca  
Scheafer, Toni  
Schenker, Deborah A.  
Scherzer, Mak  
Scheuer, John M.  
Schiller, Lisa  
Schiro, Alice  
Schiro, Frank  
Schlissel, Betty  
Schneider, Paul  
Schneider, Sandra  
Schoenfeld, Bradley  
Schuhmacher, Belinda  
Schuman, Patricia Glass

Schwartz, Robert  
Schweitzer, Marc  
Scolaro, John A.  
Seccuro, Liz  
Seigel, Joyce A.  
Serdan, Eliseo  
Serpico, Phil  
Setchim, David  
Sgobbo, Jennifer  
Shafer, Aaron  
Shah, Rushin  
Shah, Sharmila  
Shaheen, Dan  
Shanet, Laurence  
Shapiro, Emily  
Shapiro, Jonathan S.  
Shapiro, Loretta M.  
Shapiro, Rebecca  
Shapiro, Scott  
Shapiro, Stacey Cahn  
Sharkey, Catherine M.  
Sheffe, Edward  
Shelden, Brian T.  
Shin, Namchul  
Shio, Paul  
Shipman, Olivia Cheatham  
Shiva, Shahram  
Shmueli, Zvi  
Shostak, Mitch  
Shuler, Leona  
Sica, Carmen  
Sidoti, Nicholas  
Sieh, John  
Siemens, Joy  
Silkes, Veronica  
Siller, Mary Colye  
Silva, Claudia  
Silveira, Henrique  
Silverman, Ellen  
Simmons, John M.  
Simon, Jill  
Simonsen, Eric  
Simpson, Alexandra  
Simpson, Fred W.  
Singer, Roberta L.  
Siniscalchi, Joe  
Sinnreich, Gabreila  
Sipos, Paul  
Skinner, David  
Skolnick, Barry  
Smith, Brett  
Smith, Douglas  
Smith, Maria

Smith, Patricia  
Smith-Miller, Henry  
Snow, Tara  
Sommer, Douglas A.  
Sorenson, Dale  
Sowman, Alana  
Spangler, Lois  
Sparks, Georgia  
Sprinkle, Gwen  
Stalb, Elaine  
Stanke, David E.  
Stanton, Brain  
Stanuikynas, Richard  
Starr, Jeff  
Stefanski, Michael A.  
Stein, Linda  
Steinberg, Ira A.  
Steiner, Jon  
Steketee, Paul  
Stelzer, Willow  
Stemmler, Kenneth  
Stephens, James  
Stern, Anna  
Stern, Ben  
Sternberg, Billy  
Sterritt, Virginia  
Stetler, Caroline  
Steuer, Arthur  
Stevenson, Amanda  
Stewart, Virginia  
Stilwell, Jennifer  
Stix, Margaret  
Stopeck, Eugene  
Strait, Edward  
Struass, Stuart  
Stumacher, Carrie  
Sturm, Denise  
Sublette, Ned  
Sullivan, Patricia A.  
Sultani, Durana  
Sventon, Argus  
Sweum, Ricky  
Swihura, Michael  
Switaj, Michelle  
Szybillo, Alicia  
Tada, Arnold K.  
Takach, Karen  
Takahashi, Takuyo  
Tanenbaum, Rich  
Tang, Chuen  
Tardos, Anne  
Tashman, Nona  
Tavormina, Mark

Taylor, Joshua  
Tentler, Gregory  
Terrusa, Sylvia  
Themm, Caroline F.  
Thienel, Ulrich  
Thompson, Charles D.  
Thompson, Eugene  
Timm, Denis C.  
Tinio, Maricar  
Tipert, Brett  
Tippett, Keri L.  
Tisch, Howard B.  
Tomaselli, Jean M.  
Tomasino, Marguerite  
Tormo, Migdalia  
Tornatore, Carolyn  
Torres, Joanne  
Towey, Elizabeth  
Tramontano, Brian  
Treacy, Dina  
Treinen, Daniel L.  
Tse, Maritza  
Tucker, LaCanas  
Ufnal, Andrew Z.  
Uller, Deborah  
Ulmer, Craig  
Ungoco, Joseph A.  
Urevith, Patricia  
Ursitti, Joyce  
Vaccariello, Elizabeth  
Van Der Baan, Vanessa  
Vanderhoof, Leslie  
Vasquez, Manuel A.  
Velez, Ernest  
Velez, Jacqueline  
Verma, Amit  
Zebro, Bob  
Zelinski, Karen  
Zemaitis, Amy  
Zhao, Su E.  
Zhong, Muzi  
Zhou, Polly  
Zieman, John  
Zinzar-Shulemovich, Svetlana

Vicente, Bernice  
Vidov, Victoria  
Villanueva, Ethel  
Vincent, Edward  
Vincent, Judith Margaret  
Vincent, Milo  
Vonlehmdew, Joan  
Vono, Dawn  
Waldman, Marcia  
Wallas, Yasmin  
Ward, Willie Mae  
Warshay, Robin A.  
Waters, George  
Watson, Laura DiLallo  
Watson, Sandra  
Weatherford, Jeff  
Weber, Nathan  
Weinberg, Judith  
Weinstock, Judith  
Weltman, Dean S.  
Wenden, Sally  
Werbel, Meirav  
Wernhammer, Erika  
West, Joyce  
Westhall, Suzanne  
White, Cynthia  
White, Erik K.  
White, Greg  
White, Heather Anne  
White, Mary  
Whitworth, Audrey  
Whyte, Michael J.  
Williams, Barry  
Williams, Jimmie E.  
Williams, John R.  
Williams, Laurieanne

Williams, Michelle  
Wilson, Adam  
Wilson, J  
Wisner, Linda L.  
Woertz, Jason H.  
Wofford-Girand, Sally  
Wohlbruck, Nancy  
Wolchok, Robert L.  
Wolf, Michael D  
Wolfe, Michael  
Wong, Annie  
Wong, Ming Xin  
Wong, Theresa  
Woolsey, Kris  
Worontzoff, Scott  
Wu, Fu-Shing  
Wu, Joseph  
Wu, Jun Yi  
Wu, Misty  
Wu, Raymond  
Yasner, Leslie  
Yerkovich, Sally  
Yeung, Janice  
Yohe, James  
Yonker, Tiffany D.  
Young, Robert  
Youssef, Michael  
Yu, George  
Yu, Margie  
Yuan, Dorothy  
Zaczepinski, Ron  
Zamarra, Galen  
Zane-Sadowski, Linda  
Zavattiere, Donna M.  
Zavier, Lauren

**\*\*NOTE:** There were a total of 85 comments that names were illegible names, name not provided, only email given, comments from BPC message board, and petitions from specific residents.



### **Organizations and Public Officials**

- 3 Hanover Square Owners Corporation
- 38 Park Row Residence Corporation
- 55 Liberty Corporation
- Battery Park City Homeowners' Coalition
- Furnished Quarters, LLP
- Gateway Plaza Tenants Association
- Good Jobs New York
- Good Old Lower East Side, Inc.
- The Lefrak Organization
- Manhattan Borough President C. Virginia Fields
- Manhattan Community Board 1
- Manhattan Community Board 1 – Tribeca Committee
- MFY Legal Services, Inc.
- New York City Council Member James Sanders
- New York City Department of Housing Preservation & Development
- The New York Immigration Coalition
- New York State Assembly Speaker Sheldon Silver
- New York State Assembly Member Deborah J. Glick
- New York University
- New York State Senator Martin Connor
- NOW Legal Defense and Education Fund
- Pace University
- Pratt Institute Center for Community and Environmental Development
- Real Estate Board of New York
- Southbridge Towers, Inc.
- Tribeca Organization
- United States Congressman Jerrold Nadler's Office -- Laura Friedman
- Wall Street Rising
- Women's Housing and Economic Development Corporation

**B. Draft Partial Action Plan**

*Comment Period: April 9 through April 23*

***Housing Assistance Program***

**1. Expressions of Support and Requests for Information**

*Twenty commenters expressed support for the housing assistance plan. Among these comments, support was expressed specifically for the creation of the family grant, the inclusion of Nassau Street in Zone 1, the creation of Zone 3 and the new criteria for receiving the one-time \$1000 grant.*

No response needed.

*Ninety-four commenters requested further information, and eleven commenters inquired as to how to obtain an application.*

LMDC's web site, [www.renewnyc.com](http://www.renewnyc.com), will have updates on the status of program administration. When the program has been fully approved and an application process established, information on how to apply will be available through the web site and the program will be widely advertised in Lower Manhattan.

**2. Concern regarding rent restriction outlined in Item 5**

*Item 5 of the housing assistance criteria states that, in the case of any lease signed after the commencement date of the program, eligible rents must be less than the pre-9/11/01 rate of the same unit -- 90% or less in Zone 1 and 95% or less in Zone 2. Sixteen commenters, many of whom are residents of rent regulated units, expressed concern about, and in some cases opposition to this stipulation. Their concern was that landlords would not offer two-year leases on these terms, thereby making the residents ineligible for the benefit. New York City Council Member Alan Gerson expressed the concern that residents of rent regulated units would be adversely affected by this clause; a number of tenants associations also made this point. The Lower Manhattan Tenants Association suggested that the rent restrictions only be applied to new tenants. One commenter noted that pre-9/11/01 rental rates are difficult to obtain. Five commenters noted that the program has raised rents. One commenter suggested that LMDC keep rents low by instituting rent control.*

In response to these comments, the program has been adjusted as follows: (1) Rents paid by tenants in rent-regulated units may not be more than the legally permitted rents for rent-regulated units and (2) In other units, rents must be 90% or 95% or less (Zone 1 and Zone 2, respectively) of pre-9/11/01 rents for the same rental unit, plus an adjustment equal to the level of rent increases set for two-year renewal leases by the New York City Rent Guidelines Board.



### **3. Concerns regarding Item 9**

*Item 9 states that “other abatements and subsidies may be factored into the determination of eligibility and the calculation of grant amounts.” Seven commenters expressed concern about, and in some cases opposition to this stipulation. State Assembly Speaker Silver, Councilmember Gerson, several tenants associations and the Battery Park City Homeowners Coalition expressed concern about this clause.*

As stated, this Partial Action Plan “focuses on those forms of residential and job-training assistance that are not currently available.” “It does not attempt to provide assistance for needs that are already being met.” Additionally, HUD has guidelines precluding the duplication of benefits. This item provides LMDC the flexibility to review other grants and subsidies and their relationship to this plan. In reviewing these cases, LMDC will consider and comply with HUD guidelines and requirements.

### **4. Geographic Expansion**

*Nine commenters requested the expansion of the eligible zones in various permutations: specific streets such as Duane, William, Pearl and Water were proposed as new boundaries for Zone 1; specific requests were made for Zone 1 to encompass the housing developments Southbridge Towers (Speaker Silver), Chatham Green (Councilmember Gerson), and Independence Plaza North (Councilmember Gerson). Speaker Silver requested that the entirety of Chinatown and Little Italy be included in Zone 2.*

LMDC has given thorough consideration to the already revised geographic boundaries of the program and will maintain them as described in the proposed Partial Action Plan.

### **5. Two-Year Lease Issues**

*Nine commenters and the Lower Manhattan Tenants Coalition wrote that some landlords are not offering two year leases. Ten commenters stated that two years was too long of a commitment for renters.*

Two-year leases are a key component of the housing assistance program. The goal of the program is to encourage the neighborhood investment and stability that will result from an increase in two-year commitments – and two-year leases are the best available method of ensuring this commitment.

*One commenter asked that the program deem eligible any renegotiated lease that extends through 5/31/03.*

The language of the plan has been clarified and states the following: a renegotiated lease will only be eligible “if the term expires at least two years after the effective date of the renegotiated lease or at least two years after the date the renegotiated lease was executed, whichever is later.” Consistent with the rest of the program, a renegotiated lease must represent a new two-year commitment.

## **6. Zone 3 Benefit**

*One commenter requested a higher benefit for residents of Zone 3. Many residents of Chinatown (much of which is situated in Zone 3) submitted comments detailing the hardship they've suffered since September 11 and asking for assistance. Speaker Silver asked that residents of Zone 3 receive the family grant.*

In response to these comments, LMDC will give an additional grant of \$750 to Zone 3 households with children. Eligibility will be contingent on agreeing to remain in lower Manhattan for at least a year. Households with children in Zone 1 and Zone 2 will now be eligible for the family grant on agreeing to remain for at least one year, instead of the previous requirement that they qualify for the two-year commitment based grants.

## **7. September 11<sup>th</sup> Resident Issues**

*Six commenters felt that September 11<sup>th</sup> residents should not have to wait until renewing a lease before receiving the benefit. Two commenters felt that September 11<sup>th</sup> residents and long-term residents deserve more money than others. One commenter felt that the criteria for eligibility should be relaxed in the case of September 11<sup>th</sup> residents.*

LMDC modified the first draft of the housing plan in response to comments similar to these. The \$1,000 grant will be awarded to any resident who lived in the eligible zones on September 11<sup>th</sup> and remains a resident in the eligible zones. An individual need not live in the same unit or building and his or her eligibility is not contingent upon signing a new lease. Pre-September 11<sup>th</sup> residents will be eligible for their \$1,000 grants on presentation of a lease that is valid and active as of the commencement date of the program (and, if necessary, another lease demonstrating their residency within the zone on September 11<sup>th</sup>). One grant will be made per current housing unit.

In addition, LMDC altered the criteria so that two-year or longer term leases commencing on or after 6/1/01 and before 7/1/02 will be eligible. This change reduces the delay of eligibility of September 11<sup>th</sup> residents to a maximum of about a year.

## **8. Family Grant**

*Two commenters suggested that the family grant be administered per child rather than per family household.*

The family grant was a significant addition to the housing assistance program, created in response to comments received during the first comment period. In order to balance the different aspects of the plan within the budgetary framework, LMDC will maintain the payment structure outlined in the proposed Partial Action Plan.

## **9. Owner and Long-Term Resident Issues**



*Five comments requested that owners who lease-out their units be eligible for assistance.*

The goals of the LMDC program are the creation of a stable residential community and the restoration of the housing market. These goals are most effectively met by awarding neighborhood residents. A stable housing market aids owners who lease-out their units through decreased vacancy rates and increased property values. Awarding the benefit to renters will ultimately assist the owners of those units.

*One commenter noted that property owners who have completed mortgage payments may be eligible for less than other residents under the draft plan's criteria.*

This comment was received during the first comment period. LMDC decided to raise the grant for existing owners in this category to 50% of maintenance costs and taxes from the previous 30% figure – up to the cap of \$6,000 or \$12,000.

*Two commenters stated that owners should get more money than renters.*

A stable residential community requires the attraction and retention of both owners and renters to lower Manhattan; therefore the plan offers them the same benefit levels as current and long-term residents.

## **10. Grant Amounts**

*One commenter asserted that the \$1,000 grant to September 11<sup>th</sup> residents is too small.*

The one-time \$1,000 grant recognizes the extended disruption and disturbance experienced by people who resided in the eligible zones on September 11<sup>th</sup> and continue to live in the eligible zones. Within the budgetary constraints of the program, LMDC has chosen to devote greater resources to the payments that will be given out over the course of two years to increase and maintain neighborhood stability. This program aims to curtail these effects and improve the quality of life of existing residents through creation and promotion of a stable residential community that will support improvements to the community.

*Two commenters asked that residents of Zone 1 receive more money.*

Housing units in Zone 1 are eligible to receive up to \$12,000 over two-years, double the amount residents of Zone 2 receive. In addition, households with children in Zone 1 are eligible to receive a family grant of \$1,500 that is double the amount received by households with children in Zone 2.

*One commenter said the maximum grant sizes (\$12,000 or \$6,000 over two years) are too small.*

In order to guarantee the minimum payment (\$4,000 or \$2,000) to low- and middle-income residents and other provisions of the plan, LMDC chose to set these maximum payments in order to maintain the financial feasibility of the program.

## **11. Other Comments**

***Three commenters who are loft tenants inquired as to their eligibility in light of the fact that they do not have traditional leases.***

In certain limited cases, LMDC is considering processes under which it may permit proof of residency other than a lease.

***Three commenters asked that more money be provided for the improvement of neighborhood amenities.***

LMDC agrees that the amenities and institutions of lower Manhattan must be strengthened in order to ensure its continuing livability and attractiveness. The housing assistance plan, in coordination with business assistance programs administered by ESDC and the City of New York's Economic Development Corporation's as well as other enterprises, is the beginning of a coordinated effort to improve life for Lower Manhattan residents. Supporting businesses in the neighborhood and reinforcing the stability of the real estate market will enable LMDC to focus on other community improvements in the future. LMDC's advisory council structure will ensure that future projects correspond to the needs of Lower Manhattan's varied constituencies.

***One commenter stated that the comment period was too short.***

LMDC held two separate comment periods on the material in the proposed Partial Action Plan. Cumulatively, approximately 1370 written comments were received. LMDC is confident that the public's comments and concerns have been heard and considered.

***One owner of apartments leased to corporations was forced to leave the eligible zones and asked if special consideration could be given to such a situation.***

This individual will be eligible for the LMDC program pursuant to the same criteria as any other renter of corporate apartments.

***Four commenters asked for clarification of language of the plan.***

LMDC has made efforts to clarify language throughout the plan.

***One commenter stated that money should go to a leaseholder and not to a sub-letter.***

In keeping with the goal of creating neighborhood stability, the program requires that the grantee reside in the eligible unit. The goals of the program are most effectively met by providing grants to neighborhood residents, regardless of whether they are the primary or sub-lease holder.

***One commenter requested the inclusion of resident managers and superintendents who may not pay rent.***



These residents will be eligible for the one-time \$1,000 grant and the family grant. They must meet the same criteria as all other residents. Other grants in the program are based on monthly rent or mortgage, maintenance, and tax payments without exception.

***One commenter stated opposition to the clause that reads: Units leased or owned for residential purposes by corporations, universities, and other designated institutions may be subject to special criteria.***

The revised plan states that special criteria may apply to units leased and owned by corporations, universities, and other designated institutions. Eligibility is for the main subsidy and not for the pre-September 11<sup>th</sup> \$1,000 grant or the family grant. The goals would be to offer an incentive to corporations that may be making location decisions and relief to other downtown institutions.

***Four commenters expressed concern about air quality.***

At both the local and national levels, taskforces have been established to address the air quality issue in particular. The City of New York has recently established a Lower Manhattan Air Quality Task Force to address residents' concerns on this topic and has appointed a coordinator for these issues. The Federal EPA has established a body to analyze and address these issues and has made announcements on this topic recently.

***One commenter urged that the program be run efficiently.***

LMDC is currently in the process of planning the administration of this program. The current plan foresees a simple application process, convenient location(s) where residents may submit applications, the ability for residents to mail in applications, and a hotline to respond to questions.

***One commenter asked that we clarify the term "commencement date" of the program.***

The commencement date has been defined as 7/01/02.

***One commenter stated that residents who lost jobs as a result of September 11<sup>th</sup> should receive more than those still employed.***

Residents who lost jobs may be eligible for the Employment Training Assistance Program outlined in the proposed Partial Action Plan. This program will be administered through the ESDC.

***Four commenters asked if the grants were taxable.***

This question is still under consideration.

## **12. Proposals, Comments and Questions- Outside Scope of Housing Assistance**

*Two business owners wrote seeking assistance.*

ESDC and City of New York's Economic Development Corporation are the primary provider of business assistance programs to September 11<sup>th</sup> affected businesses.

*Fourteen comments expressed support for rebuilding the World Trade Center.*

*Two people submitted proposals for the future of the World Trade Center site.*

*One individual inquired about aid programs available.*

These comments and proposals are outside the scope of the housing assistance program.



***List of Commenters***

Aguilar, Lisa M.  
Ang, Sew  
Angarola, Scott  
Arantes, Lauro  
Aybek, Ipek  
Barbaccia, Joseph  
Barge, Michelle  
Barkan, Alexander  
Barkoff, Sheldon  
Baum, Jamie A.  
Bellinger, Todd D.  
Bermudez, Hilda  
Blackwell, Holly  
Brennan, Erin  
Britton, Kathleen  
Bruno, Andy  
Burke, Christopher  
Burlon, Michael J.  
Callagy, Vincent  
Carney, Cynthia  
Caroselli, Coryn  
Castillo, Betty  
Chase, Lauren  
Chin, Cha Ming  
Chow, May Li  
Cohen, April  
Cohen-Wolf, Marti Ann  
Colin-Cohen, Rose  
Cosenza, Alexander  
Crosby, Kevin  
D'Agostino, Dolores  
D'Alessandris, Paula  
Danenhauer, George P.  
David, Mary Ellen  
Davis, Michael  
Davy, Kate  
Denoyer, Tim  
DeVeaux, Darrell  
Donaldson, John W.  
Dougherty, Steve  
Dunn, Michael  
Eberhart, Stacy  
Eliason, Amy  
Elliott, Megan  
Ellis, Sabrina  
Enage, Danielle  
Fabricius, David  
Fahrer, David  
Falsone, Rico J.  
Federick, Charles  
Feldmann, Matthew  
Fluss, Ed

Fong, Xiao Li  
Freed, Kathryn E.  
Galloway, Jeff  
Gedzinsky, Ken  
Gerard, Valerie  
Goldman, Brett  
Golub, Tood  
Gonzalez, Cristine  
Graham, Trish  
Grande, John  
Hall, Craig  
Halofsky, Ada Lee  
Hansen, Kathy  
Haslett, Adam  
He, Jay  
Heffernan, Daniel  
Heine, Tom  
Hennings, Walter  
Hines, Scott  
Huang, Yu Ping  
Hyre, James  
Joers, Rick  
Jordania, Nicole  
Kelso, Christie  
Kennedy, Justin D.  
Kessler, Michael  
Kim, Nancy  
Kimmelman, Miriam  
King, John  
Klein, Esq., Saul J.  
Klinger, Michael  
Koo, Charlotte  
Krumholz, Beth  
Kwan, SanSan  
Lee, San San  
Lee, Sarah  
Lehmann, David  
Lenahan, Daniel V.  
Levey, Jamie  
Levy, Harold  
Li, Pei Lin  
Li, Qiong Yin  
Li, Su Juan  
Li, Ting Ying  
Li, Ug Ying  
Liang, Gou Chang  
Lieberman, Michael  
Lifshitz, Howard  
Link, Scott  
Love, Bill  
Mai, Xiu Hui  
Maloney, Matt  
Masionet, Santos

Masterson, Walter  
McCarter, Jonathan  
McDermott, Julie  
McFadden, Jerlyn  
McKnight, Kevin  
McKnight, Rich  
McNamara, Susan  
Measom, Chris  
Measom, Christopher  
Migliani, Anil  
Milius, Jason  
Miller, Allan L.  
Molinelli, Maria  
Moore, Barbara  
Na, Jennifer  
Neiman, Seth  
Nieto, Charles M.  
Obrero, Cesar P.  
O'Leary, Gloria E.  
O'Sullivan, Brad P.  
O'Tsao, Harry S.  
Pacetti, James  
Page, Steven R.  
Pan, Alexander  
Papps, Bruce W.  
Park, E. Betsy  
Patel, Chandubhai M.  
Patel, Ritesh  
Pelli, L.  
Pergola, Darlene  
Peterson, David  
Pinkus, Leslie  
Rafford, Bob  
Rizzi, Paul  
Rorech, Jon-Paul  
Royzman, Arsen  
Saat, Deborah  
Sanborn, Laurel  
Sanchez, Robert  
Schwartz, Jason  
Schwartz, Robert  
Screchen, Sandra J.  
Segal, Ben  
Sena, Dominique  
Separovic, Julie  
Sheffe, Edward  
Sheikh, Mikael  
Shulemovich, Alexander  
Siller, Richard  
Siracusa, Nancy Ann  
Sjostrom, Jonas  
Sohlberg, Min Ye  
Sorbello, Daniel

Sorensen, Chris  
Stanke, Dave E.  
Stanton, Kori E.  
Stempler, Miriam  
Stiles, Virginia  
Stoff, Dan  
Stone, Deirdre  
Strutt, Ben  
Tan, Shu Ring  
Tandy, Laura E.  
Tanner, Barry  
Thorp, Vaughn N.  
Tobin, Alexis Wichowski  
Trees, Barbara  
Treffe, Jennifer  
Trippet, Ty  
Tung, Kou  
Turner, Tom  
Ullman, Jim  
Vaccariello, Liz  
Vannucci, Emily  
Villar, Chris  
Visser, Lucas  
West, Joyce  
Wheaton, Leslie A.  
Williams, Lynne  
Wolf, Michael  
Wong, Judy  
Yao, Bella  
Yu, Bo Ling  
Yuen, Mark  
Zane-Sadowski, Linda  
Zenkel, Elliott L.  
Zhang, Jing Min  
Zhang, Sandy  
Battery Park City Online  
Ramapo College of New  
Jersey  
\*\*23 People did not give  
names, only an e-mail  
address.\*\*



### **Organizations and Public Officials**

- Battery Park City Homeowners Coalition
- Battery Park City United
- Council Member Alan Gerson's Civilian Advisory Committee for Downtown Development
- Gateway Plaza Management Corp.
- Independence Plaza North Tenant Association
- Lower Manhattan Tenant Coalition
- New York State Assembly Speaker, Sheldon Silver
- New York University: Director of Government and Community Relations
- Real Estate Board of New York
- The Council of the City of New York, Alan J. Gerson
- The Moinian Group and Mazal Group, LLC
- Tribeca Tower Tenant Association
- United States House of Representatives Jerrold Nadler
- WTC Environmental Coalition

### C. Employment Training Assistance

*(Note: During both comment periods combined, approximately twenty individual comments were received on this aspect of the plan.)*

Six commenters expressed support for the employment training assistance plan.

No response needed.

*Commenters suggested that in addition to businesses, other institutions such as training institutions, schools and not-for-profits south of 14th Street should be eligible. Both Community Board 1 and Spotlight on the Poor suggested this change.*

The revised plan includes both for-profit businesses and not-for-profit organizations as eligible recipients of Employment Training Assistance (ETA) grants. While schools and training institutions are not eligible as direct recipients of ETA grants, they may be selected by ETA grant recipients to be training providers.

*Three commenters felt the grant sizes were too small.*

Employment Training Assistance grants can provide up to 50% of the eligible costs of employee training. Employment training assistance is one aspect of a much larger \$700 million plan to assist businesses in Lower Manhattan administered by the Empire State Development Corporation. Businesses that are eligible for Employment Training Assistance grants may also be eligible for other recovery assistance programs.

*Councilman Sanders, the Spotlight on the Poor coalition and Good Jobs New York felt the program should be administered via a voucher system rather than through grants given to businesses. The New York Immigration Coalition, the Women's Housing and Economic Development Corporation and The Pratt Institute Center for Community and Environmental Development recommended that this program build upon existing New York City workforce development programs. One commenter asked why a grant going to businesses was included in the Assistance for Individuals plan.*

The Employment Training Assistance (ETA) program complements two other training programs available to residents of lower Manhattan. The Workforce Investment Act provides unemployed individuals with vouchers valued at \$4,000 for training to prepare them for jobs in occupations where substantial demand exists. The NYS Dept. of Labor administers a separate \$25 million federal grant to provide employment services to individuals including job training, job placement, career counseling, resume preparation and access to job banks. The ETA program provides training assistance to businesses so that they can customize skills training for workers to meet the specific needs of their operations. This program will be administered in conjunction with the Empire State Development Corporation's business assistance programs, which are designed to retain and attract business employment in lower Manhattan.



***One comment said the plan was too vague. Another questioned how beneficial the plan would be to Lower Manhattan. One comment suggested that preference be given to Lower Manhattan residents.***

Businesses must be located south of 14<sup>th</sup> Street to be eligible for the Employment Training Assistance program, thereby increasing employment opportunities for the residents of lower Manhattan.

***Borough President Fields thought a better strategy would be to focus on job creation before focusing on job training.***

As part of the World Trade Center recovery and revitalization effort, ESDC administers the Job Creation & Retention (JCR) program and the Small Firm Attraction & Retention Grant (SFARG) program, designed to retain existing businesses and attract new businesses—both small and large—to lower Manhattan. These programs are focused on job retention and creation. The availability of the Employment Training Assistance program will help these businesses increase skilled employment opportunities.

***Three commenters asked for information about receiving training assistance.***

Empire State Development will actively market the Employment Training Assistance program to business and not-for-profit organizations in lower Manhattan.

***One commenter stated that residents who lost jobs as a result of 9/11 should receive more than those still employed.***

The Employment Training Assistance program provides matching fund grants to businesses for up to half the eligible cost of worker training, regardless of whether those workers were previously employed or not. However, unemployed workers are eligible for Workforce Investment Act training vouchers valued at \$4,000. They may also be eligible for additional job training and placement assistance provided through a \$25 million National Emergency Grant administered by the State Dept. of Labor, as noted above.

***The NOW Legal Defense and Education Fund requested that the Employment Training Assistance Program “incorporate an emphasis on non-traditional training and employment programs for women.”***

The focus of the Employment Training Assistance Program is job retention and creation. ETAP funds will be used to help retain and create as many jobs as possible in lower Manhattan by offering flexible matching fund grants to businesses for worker skills training. Addressing the needs of specific groups of workers is beyond the scope and funding of this program. However, as previously noted the Workforce Investment Act funds are available to address individual worker training needs. The ETAP is intended to complement other training programs which are focused on meeting individual worker needs. This program emphasizes business needs for worker training to ensure that businesses are able to retain and hire workers that may also be receiving individual training assistance.

*Many residents of the Chinatown community wrote asking for assistance due to financial difficulties resulting from September 11.*

Workers employed by businesses south of Houston Street will receive preference in the administration of this program.