



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

September 6, 2019

Mayor Bill de Blasio
New York City Office of the Mayor
City Hall
New York, NY 10007

Re: NYC Emergency Preparedness Planning

Dear Mayor de Blasio:

As the 2019 hurricane season intensifies, I am writing to request updates on the City's emergency preparedness plans and the degree to which lessons learned from Superstorm Sandy have been built into the way our agencies plan, procure and prepare for the next great storm. As climate change escalates and sea levels continue to rise, New York City must be prepared to contend with the ever greater risk posed by hurricanes and floodwaters. Already, scientists estimate that storms on the scale of Sandy could be one-in-25 year events, rather than one-in-500 year anomalies. While the City has an obligation to invest today in the resilient infrastructure and necessary safeguards that can shield homes and businesses from the impacts of the next storm, we must also be prepared to quickly mobilize to help protect New Yorkers the moment the next disaster strikes.

My office has extensively documented how the City failed New York City residents in the days, months, and years following Sandy. Whether it was the New York City Housing Authority (NYCHA) lacking crucial contact information for tenants with disabilities, or the many administrative and policy failures that left desperate applicants to the City's Build it Back program waiting years for repairs to their homes, Sandy exposed the necessity for careful preparation in advance of a future storm. This letter seeks assurances from your administration that the City has made discernable progress in developing new protocols to more efficiently respond to and recover from disasters, including addressing specific findings identified by the audits, letters, and reports issued by my office.

As such, pursuant to the Comptroller's authority under Section 93 of the New York City Charter, the Office of the New York City Comptroller respectfully requests the following information:

I. NYCHA

Our audit of NYCHA in 2015 found a range of deeply troubling deficiencies in the agency, including:

A. Incomplete Tenant Information – Assisting residents with disabilities must be a top priority during emergencies, yet our auditors found that the Authority's data on these at-risk

tenants was incorrect and incomplete, leaving them dangerously vulnerable. Please describe what actions, if any, have been taken to address the following issues:

- 1) Please describe steps taken to ensure that information on all disabled occupants within NYCHA is current and accurately recorded and reported in each of the relevant systems, files, and lists intended to provide for the safety of all residents. Please specify if these records include the number of disabled occupants residing at each location, the type of disability, and their emergency contact information.
- 2) Please provide any plans or protocols designed to ensure that all emergency contact information for the disabled tenants is accurate and is being properly updated in NYCHA's Tenant Data System (TDS).
- 3) Please describe what steps, if any, are in place to maintain an accurate record of NYCHA staff attempts to contact disabled tenants in the event of an emergency and whether or not contact was made?

B. NYCHA's Emergency Procedures Manual (EPM) – Our audit revealed that NYCHA's EPM failed to provide critical information about a range of issues, including the agency's emergency management leadership and hierarchy; its communication plan for disseminating information to NYCHA's employees, residents, and others in the event of an emergency; or an inventory of NYCHA's capabilities and potential hazards during major emergencies, including identification of its resources, critical services and operations, and community groups that could potentially assist with the emergency response. In a November, 2016 status report shared with our office, NYCHA said it had developed a communications plan but was still working to draft and implement a broad Comprehensive Emergency Management Plan.

- 1) Please provide a copy of the agency's Comprehensive Emergency Management Plan.
- 2) Please describe all efforts undertaken to date to implement the Comprehensive Emergency Management Plan at every development in the city.
- 3) If there is a separate Emergency Public Information Plan, as referenced in your 2016 response, please provide the most recent copy.

C. Lack of Emergency Drills and Trainings – Emergency drills are an indispensable part of preparing staff and identifying issues that might arise during a crisis, and yet our office found that NYCHA paid little attention to this critical responsibility, holding only a few drills in select locations, and failing to hold any drills in three quarters of its developments.

- 1) Please describe what steps have been taken to systematically conduct drills, exercises and other training events at all NYCHA developments. Included in this should be a full listing of all emergency drills performed at NYCHA facilities during each of the last three fiscal years, the dates of each and the developments at which they occurred.
- 2) In its 2015 response to our audit, NYCHA officials agreed that a multi-year training and exercise schedule will be a part of any finalized Comprehensive Emergency Management Plan (CEMP). Please provide an update of those efforts, including a copy of the most recent CEMP.

D. Emergency Leadership Roles Not Identified or Adequately Defined – Our 2015 audit found that NYCHA’s Emergency Preparedness Manual did not define who is in charge during an emergency, and staff instead relied on an *ad hoc* command structure.

- 1) Please provide a copy of NYCHA’s most recent Emergency Preparedness Manual.
- 2) What steps have been taken in recent years to better define an emergency command structure at each NYCHA development, including roles and responsibilities for all employees who may need to assist in the event of an emergency.

II. Emergency Procurements

A. Building Fiscal Resiliency: To quickly secure goods and services during unforeseen crises, emergency procurements are an essential tool for the City. That said, emergency contracting can drastically raise prices for taxpayers, as during a crisis agencies are allowed to contract with providers on an expedited basis using a level of competition commensurate with the emergency condition. That’s why many governmental jurisdictions have developed emergency contract plans, allowing them to pre-negotiate rates and establish a network of “on-call” contracts for specific goods and services that could be needed in an emergency.

- 1) Please describe any efforts to develop and publish a citywide procurement plan to be used in the event of a major emergency. Ideally, any such emergency contracting plan would draw on the expertise of multiple agencies and would extend beyond basic items such as water and blankets to more difficult procurements like social services, telecommunication, construction, transportation, and temporary office space, and housing.
- 2) Please provide a catalogue of “on-call” contracts for the procurement of emergency goods and services that the City can access in the event of an emergency. Please include information about “Emergency Contract Riders” – or emergency-specific provisions – allowing access to select services under existing citywide contracts to be activated in an emergency situation.

III. Build it Back & Rapid Repairs

A. Improving Housing Recovery Programs – Challenges associated with the administration of the City’s post-Sandy “Rapid Repairs” and “Build it Back” programs have been well documented, including in reports, letters, and audits by my office. In the advent of another storm, the City must have improved programs to help deliver housing repairs to vulnerable New Yorkers and allow them to shelter in place.

- 1) Please indicate if the City has undertaken any type of post-mortem review of a Build it Back-like program, and if the City has determined on any new best practices that can guide a future iteration of a Built it Back-like program.
- 2) Please describe any efforts made to prepare or pre-negotiate contracts that could facilitate a Rapid Repairs-like program. Please describe the division of responsibility across various agencies and offices as related to future housing recovery programs.

IV. Resiliency Measures

A. Interim Flood Protection: As my office has previously documented, the City has to date spent approximately 54 percent of federal funding linked to Sandy recovery. As the City continues to install and construct resilient infrastructure and coastal defenses funded by federal dollars, New Yorkers are relying on the City to make use of interim and temporary flood protection measures to protect themselves and their homes.

- 1) Please describe the scope and location of interim flood protection measures across the City, including pre-deployed Hesco barriers. Please describe the City's rationale for siting these measures and any future plans for installing Hesco barriers, including on the Lower East Side.
- 2) Please indicate the locations where the City may anticipate use of temporary 'just-in-time' measures, such as Tiger Dams or sand bags.
- 3) For areas such as Red Hook, Astoria and the Lower East Side where the City has stated an intention to rely on the use of interim flood protection measures, please explain the extent to which temporary flood protection can mitigate flood risk from different varieties and sizes of storms.

For each item, if the relevant City agency does not have the information requested, please so state in the response and provide the reason. In addition, when responding to this letter, please state the item number to which the information relates. Finally, to further this inquiry, we would appreciate your acknowledging receipt of this request and advising us of your designated liaison who will facilitate the Department's response to the Comptroller's Office.

I would be grateful if you could direct that the requested information be provided by September 15, 2019 to Nichols Silbersack, Deputy Director for Policy, Office of the Comptroller at nsilber@comptroller.nyc.gov and 212-669-7133. Thank you in advance for your time and attention to this matter, and we look forward to hearing back from you.

Sincerely,



Scott M. Stringer
New York City Comptroller

- c: Vito Mustaciuolo, General Manager & COO, New York City Housing Authority
Deanne Criswell, Commissioner, NYC Emergency Management Department
Jainey Bavishi, Director of the Mayor's Office of Resiliency