

LOWER MANHATTAN DEVELOPMENT CORPORATION

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

PARTIAL ACTION PLAN 1

All funds allocated to the activities identified below in Partial Action Plan 1 have been spent. Partial Action Plan 1 is closed.

The Lower Manhattan Development Corporation (LMDC) prepared the following amended 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 expenditure of \$251,747,304 for the following items:

1. Residential Grant Program totaling \$236,057,064
2. Employment Training Assistance Program totaling \$337,771
3. Design and installation of the interim memorial for victims of the September 11th World Trade Center tragedy and the 1993 World Trade Center bombing totaling \$309,969
4. Planning, administration, and overhead costs totaling \$15,042,500

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 constitutes a substantial amendment and such amendments were made available for public comment and approval by HUD.

Partial action plans have detailed the projected expenditure of the remainder of funds available from the \$2 billion appropriation and have been subject to a public comment with later submissions to HUD.

Action Plan Categories	Original Allocation	Previous Amended Allocations	Revised Final Allocation
Residential Grant Program	\$280,500,000	\$236,180,809	\$236,057,064
Employment Training Assistance Program	\$10,000,000	\$346,000	\$337,771
Design and Installation of Interim Memorial	\$350,000	\$309,969	\$309,969
Administration and Planning	\$15,042,500	\$15,042,500	\$15,042,500
Total	\$305,892,500	\$251,879,278	\$251,747,304

National Objective

The activities contained in this Partial Action Plan were designed to meet the needs of individuals affected by the September 11, 2001 World Trade Center disaster, as well as community and development needs. These activities had particular urgency because LMDC had determined that existing conditions posed a serious and immediate threat to the health or welfare of the City of New York and the individual residents of the City and other financial resources were not available to meet such needs. The geographic areas that were the focus of this and future partial action plans are located in Manhattan, on or 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 residential grant 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), the Empire State Development Corporation's (ESDC) web site (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 Residential Grant 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 Residential Grant 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 acknowledged the extensive and unprecedented physical, economic, and emotional damage to the areas in close proximity to the former World Trade Center and offered several forms of assistance to individuals affected by the September 11th disaster.

First, the Plan proposed a Residential Grant Program (formerly known as the Housing Assistance Program) that recognized the extended hardship, extraordinary financial expenses, and quality-of-life disruption suffered by individual residents of lower Manhattan since September 11th. The Residential Grant Program sought to compensate individuals for the extraordinary expenses they may have incurred as a result of the disaster, as well as created incentives for individuals and families to rent, purchase, or remain in housing in lower Manhattan, which continued to be a national disaster area. Second, the plan proposed an Employment Training Assistance Program that provided job training assistance to affected individuals to help prepare them for employment at companies in lower Manhattan. Third, the plan proposed expenditures related to an interim memorial derived from a damaged work of art retrieved from the disaster site that served to provide comfort and common commemorative ground for the victims and survivors of the attacks on the World Trade Center on September 11th and in 1993. Lastly, the plan proposed 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 sought federal funding from HUD and acknowledged that an array of government and private sector programs were established to provide assistance to individuals. It did not attempt to provide assistance for needs that were already being met through such sources. Instead, it focused on those forms of residential and job-training assistance that were 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, offers information on assistance available. At the time this Action Plan was initially approved, programs for individuals impacted by the September 11th tragedy included:

Government Programs

Victim Compensation Fund. The fund provides economic compensation to families and dependents of victims of the September 11th 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 was 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 had already been disbursed by March 2002. As of September 11, 2002, the Red Cross provided:

- \$235 million in direct assistance to 3,300 families of the deceased and seriously injured;
- \$276 million to 54,700 families of displaced workers, residents, and disaster workers; and
- \$95 million in immediate disaster relief that has provided 14 million meals, mental health services for 237,000 people, and health services for 131,000 people.¹

¹ Source: "American Red Cross September 11, 2002: One Year Later Report".

The September 11th 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 11th Fund includes:

- Victims & Families - 92%
 - 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)²

The Twin Towers Fund 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.³

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.

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

³ Source: "Twin Towers Fund" web site, April 26, 2002.

I. Residential Grant Program (f.k.a. Housing Assistance Program)

Background

The World Trade Center disaster and concurrent damage to the transportation infrastructure and the surrounding residential and commercial communities had an immediate negative impact on the housing market in lower Manhattan, which resulted in a significant increase in vacancy rates. For many months, access to a large area surrounding the site of the former World Trade Center was severely restricted due to the wreckage and debris and the associated recovery workforce and equipment, including extensive arrangements for emergency power supplies. This restricted zone spanned the entire area south of Chambers Street and west of Nassau and Broad Streets including Battery Park City, which is the entire area to the west that is bounded by the Hudson River and contains the World Financial Center complex and a large residential community that is immediately to the south and north of the World Financial Center. LMDC had designated this area as “Zone 1,” the immediate impact zone. Access was also restricted in two zones beyond the immediate impact zone for various periods of time and some parts remain restricted due to their proximity to law enforcement facilities. These three zones correspond generally to the areas in Manhattan that are closest to the World Trade Center site and whose residents experienced the most exposure to the effects of the disaster, including the release of materials associated with the collapse of buildings, the fires, and the continuing clean up efforts. All residents of lower Manhattan faced a number of concerns regarding the effects of the tragedy such as issues of quality of life, transportation, health care, and the disruption caused by ongoing construction that was and continues to be necessary to rebuild lower Manhattan. As part of the recovery process, the economic impact of many of these issues was being addressed through grant programs administered by FEMA and other Federal, State, and City agencies. Unfortunately, when the initial criteria for this program was 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.⁴ Some rental prices fell 30 percent in Battery Park City⁵ and rents in the Financial District fell from 16 to 21 percent on average.⁶

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 2001.⁷ By January, very few units had sold in Battery Park City while some were still listed at 15 percent below September prices.⁸

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

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

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

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

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

Purpose of Program

Since September 11th, residents of lower Manhattan have suffered significant hardships, including financial hardships, as a result of the disaster. A primary purpose of the Residential Grant Program was to provide financial assistance to lower Manhattan residents in recognition of the personal, family, and living expenses they may have incurred as a result of the disaster.

The Residential Grant Program also recognized that Lower Manhattan's residential population is essential to the continued viability of the area's businesses. Increased housing vacancy rates had a significant negative impact on the area's economic recovery. Increasing vacancies in the rental and owner-occupied housing markets began a downward economic cycle, reducing business activity, which in turn made housing in the area less attractive.

Development of an effective program to encourage individuals to remain in, or move to, housing in lower Manhattan required 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 have continued to adversely impact the area's housing market and commercial activity.

The Residential Grant Program outlined in this Partial Action Plan met these goals. Response to the Draft Assistance Plan for Individuals first announced in February 2002 was immediate and positive. Although Battery Park City's occupancy rate fell to 60% after the disaster,⁹ 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.¹⁰ In general, anecdotal evidence from building owners and prospective tenants showed 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 lived within walking distance of their place of employment. Residential income characteristics reflected the area's industry mix, which included 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 had a median household income that was lower than the area west of Broadway, which was characterized by relatively high household incomes.¹¹

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 complemented 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.

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

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

¹¹ 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.

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 were not south of Canal Street, this area experienced significant inconvenience, disruption, and economic hardship as a result of September 11th.¹²

Criteria for Assistance

This program offered financial assistance to residents who may have incurred substantial and extraordinary financial expenses as a result of the disaster. It also offered substantial financial incentives to offset the perceived and real disadvantages of living in lower Manhattan. In recognition of the costs incurred by residents and to encourage individuals to sign or renew leases or purchase or retain housing, in lower Manhattan, the following categories of grants were proposed:

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

These grants were intended to provide an incentive to individuals to make a two-year commitment to lower Manhattan. This two-year commitment by residents stabilized the residential communities adversely impacted by the September 11th tragedy and recognized the value of the burdens and costs that may have been connected with living in lower Manhattan as it remained a designated disaster area and rebuilding commenced. In addition, the minimum grant amounts were intended to compensate those residents who incurred or will incur extra expenses because of the continuing effects of the September 11, 2001 disaster. The minimum grant amounts (\$4,000 per unit in Zone 1 and \$2,000 per unit in Zone 2) were expected to be reasonably commensurate with the extra reasonable and necessary personal, living, or family expenses that grant recipients had incurred or would incur as a result of the September 11, 2001 disaster, from the time they commenced residing in Zone 1 or Zone 2 through the second anniversary after the initial grant payment was made, excluding personal, living, or family expenses that were reimbursed from other sources, including FEMA and private insurance.

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) were 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. The Plan provided a minimum grant of \$4,000 per assisted unit over two years.
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) were 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. The Plan provided a minimum grant of \$2,000 per assisted unit over two years.

¹² “Chinatown After September 11th: An Economic Impact Study,” Asian American Federation of New York, April 2002, p. A11.

3. To be eligible for the grants related to rental units described in Items 1 & 2, all applicants had to meet the following criteria:
 - The unit had to be occupied by the applicant and the applicant had to 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 applied:
 - Rents paid by tenants in rent-regulated units could not be more than the legally permitted rents for rent-regulated units.
 - Rents paid by tenants in non-rent-regulated units could 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 did not apply to newly constructed units coming on line after September 11, 2001 or to units whose rent-regulation status changed between September 11, 2001 and June 1, 2003.
 - Going forward, these rent restrictions had to be adjusted to reflect market conditions.
 - Leases of existing tenants where the term of the lease was or had been renegotiated would only be eligible if their term expired 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 was later.
 - Tenants had to show that their rental payments were up to date (or were otherwise lawfully placed in escrow).
 - Payments under the program were made directly to eligible tenants for up to two years.
 - One grant was made per housing unit.
 - Additional eligibility criteria regarding health, safety, and habitability of buildings were also applied to this program.

4. To be eligible for the grants related to owner occupied housing described in Items 1 & 2, all applicants had to meet the following criteria:
 - The unit must have been occupied by the owner applicant and the owner applicant had to comply with one of the following two options:
 - (a) Existing owners had to agree to remain for at least two years after July 1, 2002; or
 - (b) New owners who purchased on or after July 1, 2002 and on or before May 31, 2003 had to agree to remain for at least two years.
 - Only owner-occupied residences were eligible for assistance. Owners who leased out their residences were not eligible for this assistance, but their tenants were eligible if they satisfied the criteria set forth in Item 3. See Item 5 for possible exceptions.
 - Existing owners who had completed the payment of their mortgages were 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 had to show that mortgage, maintenance, and real estate and related tax payments were up to date (or had otherwise been lawfully placed in escrow).
 - Payments under the program were made directly to eligible owners for up to two years.
 - One grant was made per housing unit.
 - Additional eligibility criteria regarding health, safety, and habitability of buildings were applied to this program.
5. Units leased or owned for residential purposes by corporations, universities, and other designated institutions were subject to special criteria. These units were only eligible for the grants described in Item 1 and Item 2.
6. LMDC determined whether buildings were 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 were deemed eligible. This certification process varied for certain subsets or categories of buildings.

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

These grants for residents of lower Manhattan who continued to live in the area since September 11th provided compensation for the substantial and extraordinary personal, family, and living expenses they may have incurred as a result of the disaster and provided an additional incentive for them to remain. These grants recognized the value of a commitment to remain in lower Manhattan despite the displacement of many residents and the significant inconvenience, disruption, and economic costs that residents had experienced since September 11th as a result of the disaster.

7. A one-time grant of \$1,000 was available per currently occupied housing unit in Zone 1, Zone 2, or Zone 3 (Zone 3 was 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 continued 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 were eligible for this grant.

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

These grants were intended to provide an incentive to families to make at least a one-year commitment to live in lower Manhattan, recognizing that keeping and attracting families was crucial to the stability and vitality of lower Manhattan. In addition, these grants were intended to compensate such families for the extra expenses they incurred or would have incurred because of the continuing effects of the September 11, 2001 disaster. These grants were expected to be reasonably commensurate with the extra reasonable and necessary personal, living, or family expenses that grant recipients had incurred as a result of the September 11, 2001 disaster, from the time they commenced residing in Zone 1, Zone 2, or Zone 3 through the first anniversary after the grant was made, excluding personal, living, or family expenses that were reimbursed from other sources, including FEMA and private insurance.

8. Eligible rental units and owner occupied housing within Zone 1 whose household included one or more children under age 18 at the date of their application were eligible for an additional family grant of \$1,500. One grant was 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 included one or more children under age 18 at the date of their application were eligible for an additional family grant of \$750. One grant was 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 had to meet the following criteria:
 - The unit must have been occupied by the applicant and the identified child(ren) and the applicant had to comply with one of the following four options:
 - (a) The applicant had to 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 had to 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 had to agree to remain for at least one year after June 1, 2002; or
 - (d) New owners who purchased on or after June 1, 2002 and on or before May 31, 2003 had to agree to remain for at least one year.

Supplemental Assistance: Item 11

11. Abatements and subsidies for the same purpose as the grants in this program were factored into determinations 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: \$237,500,000.

The program originally allocated up to \$280,500,000. Program eligibility ended on May 31, 2003 and actual program cost was less than originally estimated by approximately \$43,000,000. The program benefited over 65,000 households as summarized in the table below.

The program cost was further reduced by \$1,319,191 because reserves initially held for certain costs were not required. LMDC’s Final Action Plan addressed the reallocation of the \$44,319,191 savings. After all payments related to this program were made and recovered funds were collected, the \$123,743 residual balance in this activity was transferred in June 2016, to the Final Action Plan Economic Development activity, thus closing this activity.

Type of Grant	Grant amount (millions)	# of Grants
9/11 Grants	30.8	30,771
Family Grants	7.0	8,087
2-Year Commitment Grants	188.1	26,504
Total	\$225.9	65,362

Administration of the Residential Grant Program

LMDC contracted with multiple entities to provide administrative services in connection with this Residential Grant Program. The program administrator(s) and LMDC staff established specific guidelines for the program based on the criteria for the Residential Grant Program as described in this Partial Action Plan.

Reallocation of Residential Grant Program funds not required for the program

The allocation for the Residential Grant Program costs was reduced in September 2006 from \$280,500,000 to \$236,180,809 because demand was lower than originally anticipated. Program eligibility had ended and this reduced allocation reflected the estimated amount to be disbursed. The June 2016 technical amendment further reduced the allocation by \$123,745 to \$236,057,064 reflecting the actual program costs. The residual funds (\$123,745) were reallocated to the Economic Development activity in the Final Action Plan which will describe how these funds will be reallocated to fulfill LMDC’s mission.

II. Employment Training Assistance Program

Background

An array of job training programs was provided through existing workforce development programs to help individuals affected by September 11th obtain basic skills needed for employment in the New York City area. For example, New York State had 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, helped workers dislocated as a result of the tragedy transition back into the workforce.

In addition, unemployed individuals received training vouchers valued at \$5,000 through the Workforce Investment Act for training that prepared them for jobs that were 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 was intended to provide grants to train current and prospective employees of businesses and not-for-profit organizations in the area south of 14th Street. Such grants prioritized individuals affected by September 11th, specifically individuals who lost wages and worked below Houston Street on September 11th, providing them with the skills they needed to succeed at the specific work processes found at those businesses.

1. Assistance was in the form of grants to businesses and not-for-profit organizations south of 14th Street. These grants were used for training and retraining for skills specific to the needs of these businesses, not-for-profit organizations, and employees.
2. Eligible firms must have employed fewer than 500 people.
3. The maximum benefit was 50% of eligible training costs.
4. Groups of small firms (so-called training consortia) were eligible applicants, and could have received a fee of up to 5% of training costs for administration.
5. \$337,771 was expended through this program.

Administration of the Employment Training Assistance Program

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

Reallocation of Employment Training Assistance Program funds not required for the program

The allocation for the Employment Training Assistance Program was reduced in Amended PAP 4 and approved by HUD on February 28, 2006. The Amendment initially reduced the allocation from \$10,000,000 to \$500,000 because demand was lower than originally anticipated. This next Amendment further reduced the allocation by \$154,000 to \$346,000. Program eligibility had ended and this reduced allocation reflected the estimated amount expected to be disbursed. The June 2016 technical amendment reduced the allocation to \$337,771 reflecting the actual program costs. The residual funds (\$8,229) were reallocated to the Economic Development activity in the Final Action Plan which will describe how these funds will be reallocated to fulfill LMDC's mission.

ETAP was introduced in July 2002. ESDC and related groups have conducted marketing and workshops to educate small businesses in Lower Manhattan about this program. Ten firms (with 303 employees) received grants totaling \$337,771.

This program is similar to programs offered by the Federal, State, and City governments and by not-for-profit organizations. These programs included:

- Federal:
 - H-1B Technical Skills Training Grants - \$200 million in grant funds for skill training programs for unemployed and employed workers.
- State:
 - BUSINYS - funds for businesses to provide training to workers in specific skills needed for that industry for career growth and increased wages.
 - Layoff Aversion Training Activities - funding to support training needs as part of a businesses layoff aversion strategy.
 - Management E-learning pilot program funded by Labor Dept. with State Workforce Investment Board- assists in upgrading managers' skills- offers 450 courses in various management topics.
- City:
 - NYC Training Grant - The NYC Training Grant program attracted many positive responses and applications from companies interested in training new and current employees, including businesses in Lower Manhattan. As a result, the City obligated all funds available to the program.
 - On-The-Job Training - This program provides reimbursement of up to 50 percent of a targeted new employee's salary during the employee's training period.
 - Worker Career Centers Training Vouchers - Individual training vouchers for up to \$2000 awarded to individuals based on needs and assessment.
 - Customized Training Contracts – NYC Workforce Investment Act (WIA) system through the One Stop can allocate training funding through a contract training that is customized to businesses' specific needs.

- Not-for-profits:
 - Consortium for Worker Education (CWE) has the capacity to design industry-specific training initiatives to meet the needs of its union partners. CWE is currently preparing participants for careers in the banking, construction, health care, and child care industries.
 - September 11th Fund Employment Assistance: Surviving family members and the severely injured (regardless of pre-9/11 employment), and all displaced workers (regardless of immigration status) who lost jobs or experienced severe loss of income between September 11, 2001 and January 11, 2002, and worked South of Canal (or in portions of Chinatown and Little Italy) received career counseling, job readiness training, job referrals, English classes, and skills training and income support while in job training.

Businesses in the area had oversubscribed to programs such as the Business Recovery Grant (BRG) program and undersubscribed to ETAP. Therefore, LMDC reallocated \$9,500,000 from ETAP to the BRG program through Amended Partial Action Plan 4. This allowed alternative sources of funding to be used for employment training assistance and targeted HUD funds where there was an immediate demand for funding and limited alternative sources of funding.

Later amendments reduced the ETAP allocation by an additional \$162,229 based on actual program expenditures. This amount has been reallocated per the Final Action Plan.

III. Interim Memorial

The Lower Manhattan Development Corporation provided funding for the design and installation of the interim memorial for victims of the September 11th 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 11th 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 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.

The original allocation for this program was \$350,000 which was reduced through Partial Action Plan amendments to its actual cost of \$309,969.

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 11th 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 made this and other information available to its eight advisory councils and to the public via LMDC web site, www.renewnyc.com. In addition, LMDC has been responsible to oversee and monitor the program administration by others of the Residential Grant Program and the Employment Training Assistance Program described in this Partial Action Plan. HUD has authorized the use of up to 5%, including this \$15 million allocation, of grant funds 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 the initially proposed Partial Action Plan. Section V.A. reflects the comments, modifications, and clarifications made to the initial criteria for the Residential Grant Program presented in the Draft Assistance Plan for Individuals after the first public comment period from February 21 to March 13, 2002. 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, 2002. 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, provided 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 11th. 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 delays 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 11th 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 made 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 was 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, 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	Bansal, Rohit	Borstad, Kristen P.
Abramson, Steven	Barat, PhD, Kahar	Boyer, Lindsey A.
Acarino, Danielle	Baratta, Dorothy	Bracett, Vernon
Adams, Cleveland	Barkan, Alexander	Bradley, Elizabeth
Adams, Kelly	Barnwell, Michael	Bratton, William
Adnan, Dani	Baron, Estelle	Braunstein, Selma
Adoradio, Allison	Baros, Tim	Bravman, Barry
Aezen, Samantha	Barshop, Douglas	Brindisi, John
Agnifilo, Karen Friedman	Bartsch, Anita	Britton, Kathleen
Aguilera, Julia Sepulveda	Bastawros, Mary N.	Brizzi, Thomas
Alexander, Diane	Basu, Ron	Brooks, Yvonne
Alexander, Heidi	Bauer, Alfred Y.	Browde, David
Allen, Charles F.	Bauer, Annette	Brown, Mike
Allen, Kim	Baum, Jamie A.	Browne, Jr., William S.
Alm, Rick	Bawa, Alpana	Bruce, Judith
Alper, Jerry	Beehler, Barbara A.	Bruno, John
Alterman, Daniel L.	Begun, Richard	Bruno, Joseph
Ambrosino, Arthur M.	Ben-Ari, Daphne	Bruno, Michelle
Amerkanian, Linda	Bender, Michele	Bruns, Arndt
Andersen, Cecilia	Benedict, Derek E.	Bryant, Cory M.
Anderson, Barney	Benfield, Angela	Bryant, Lori
Andresen, Matt	Bennetti, Stephanie	Bryant, S
Andresen, Teri	Benson, Irene	Buckner, David
Andrew, Jason	Berg, Fraya	Burke, Adam
Andrus, Eric	Berkower, Elise	Butorac, Gordana
Anello, Christina	Berla, Krissy	Butziger, Alexander M.
Anglim, Kevin	Berlin, Douglas	Byrne, Ciara
Ante, Spencer E.	Berliner, Gerald	Byrne, James M.
Apati, Monica	Berman, Andrew	Calbi, Greg
Aponte, Ada	Berman, Ben	Callahan, Gina
Appolonia, Lisa	Berman, Jack	Caloyeras, Alik
Arango, Lazara	Betancourt, Sarah	Campbell, Karen L.
Arena-Mastro Paolo, Joan	Bhatt, Rita S.	Cannon, Mark
Arlt, Kathy	Bikel, Theodore	Capalbo, Martine
Arnette, Sharon	Billig, Pamela	Caporale, Emily
Arroyo, Wanda	Binder, Jeffrey	Cappellano, Joan
Ashare, Raini	Binham, Caroline	Caprino, Mariann
Ashman, Anastasia	Biondolillo, Thomas P.	Capurso, Mary
Atnally, Richard	Bissmeyer, Michael	Carbonara, Lisa
Au, Jonathan	Bitman, Craig A.	Cardyn, Lisa
Autz, Lisa	Biundo, Elizabeth a.	Carideo, Debi
Aylward, Ilonka	Blackwell, Donna	Carreras, Leo J.
Babich, Vanessa	Blech, Miriam	Casper, Pamela
Bachand, Kathleen M.	Blevin, Jane	Cassell, Peter
Bailey, Ruby	Blisko, Paula	Castro, Yvonne
Bain, Aron	Blue, Philip Y.	Catton, Clifford
Baizan, Antonio	Blum, Bill	Cavusoglu, Sezin
Baker, Julia B.	Bochert, Park	Ceballos, Wilmi R.
Balestriere, John	Bodwell, Vicki Mote	Cesaria, Jenny
Balestrieri, Peter	Bokuniewicz, Carol	Chan, M.M.
Banh, Amanda	Booth, Stephen	Chan, Tony
Bannon, William	Borden, Brooke	Chan, Yim Ngor
	Borri, Gregg	Chan, Yuk Ting

Chang, Jason	Cordes, Robert	Dodnick, Fred
Charny, Sylvia Z.	Coriceprion, Lysia	Dominguez, Elizabeth P.
Cheng, Fai	Cornell, Gail	Doruk, Bige
Chernock, Joseph	Costa, Salvatore P.	Dougherty, Steve
Chernow, JoAnne	Cote, Nell M.	Douthett, Catherine
Cheung, Fungyin	Courtney, Kerri	Drozdik, Orshi
Childers, Carol N.	Coury, Steven	Duerr, Barbara A.
Chin, Ken	Cousins, Natalie	Duffy, Anne-Marie
Chmiel, Pamela	Cowlin, Bruce	Durante, Donald
Cho, Jay W.	Cox, Norman	Duryea, Brian
Chong, Sun Fat	Cremens, Kevin	Dyson, James
Chong, Susan	Crespo, Judith	Ebersold, Danieliel Y.
Choudhury, Annette	Criscione, Fred	Eder, Sherla
Chrisman, John	Cronk, Elizabeth A.	Ejsmont, Alexander
Chu, Peter	Cullen, Catherine	Eliason, Amy
Chu, S.C. Arnold	Cummings, Michael	Elliott, David
Chu, Whei	Curbelo, Leo	Ellison, Richard
Chui, Kai Min	Curtin, Matt	Engelbreacht, Kate
Chung, Anthony	Curtis, Frances	Engler, Laura
Chung, K. Leonard	Cyborowski, James	Enriquez, Melissa
Ciabattoni, Steven	D'Agostino, Dolores	Epelbaum, Jennifer Turley
Ciment, Mendel	Dahl, Julia	Epstein, Louis
Claggett, Michael	Dallal, Marla	Eskenazi, Rachel
Clark, Abel	Daly, Antonia	Fabian, Michael
Clark, Corine	Daly, Christopher	Fabricius, David
Clark, David	Damato, Anthony	Fahrer, David
Clark, Macquarie	Damions, Derrick	Falsone, R.
Cleary, Gail P.	D'Angelo, Nick	Farha, Philip
Co, Elaine	Darer, Evelyn	Fariello, Vittoria
Coffey, Barbara	Davidson, Robert	Farlow, Darren
Coffey, Tom	Davis, Rachel	Farmiga, Adriana
Cogshall, Jeffrey	Davis, Seth	Fasnacht, Heide
Cohen, Jeremy	Dean, Mary	Faustino, Kathleen
Cohen, Roger	Decker, Wayne	Fedonchik, Scott
Cohen-Wolf, Marti Ann	DeFrancesco, Denise	Feigan, Carly
Coher, David	Delcourt, Bernard	Feinberg, Martin L.
Colaio, Vito	D'Elia, Brett J.	Feinblum, Brian
Colalucci, Brian F.	Dell, Heather	Feldman, Errol
Colangelo, Kelly	Dembowski, David	Fellner, Tmar E.
Colasacco, Colleen	Demirel, Ersel	Feng, Susan
Cole, Dana	Denes, Christen	Fennlly, Glenn J.
Collins, Linda	DeRosa, Chrisine	Fernandez, Elizabeth
Collins, Mary Lou	Desmond, Colleen	Fernandez-Serrano, Lucrecia
Colman, David	Desmond, Sarah	Ferrara, Jane
Colombo, Renee	Devoe, Milda M.	Filan, Mary T.
Coluccio, Christian	Devoto, Horacio	Finci, David L.
Colwin, Bruce	Diamond, Mitchell S.	Fingeret, Brian
Communiello, Patricia	Diaz, Eddie	Finkel, Sharen
Cook, Jerred	Dierickx, Mary	Fitzgerald, Linda
Cook, Wendy	DiLoreto, Gaia	Flamm, Peter
Cooney, Margret	Dinorcina, Matthew	Flanagan, Debbie
Cooper, Karen	Doben, Elayne	Fleischman, Allan M.
Corbin, Lori	Doberman, Edward A.	Flores, Nydia

Florman, Laura	Gordon, Marcy	Hintz, Michael
Fluss, Edward A.	Gottlieb, Janet Graham	Hirschberg, Todd
Fogle, Angela M.	Gottlieb, Theodore	Hitchcock, John
Fontanilla, David	Gould, Larry	Hoa, Nickie
Fox, Jeremy	Granado, David	Hodgkin, Carter
Franchino, Charles	Grande, John	Hoffman, Howard S.
Freedman, Beth	Grassi, Michele A.	Hogans, Keisha
Freeman, Robbin	Green, Jessica	Holguin, Jr., Eleodoro
Friedman, Jillian	Green, Lyn	Holmes, Charise
Friedson, Donna	Green, Phyllis	Hom, Albert
Friman, Paul	Greenberg, Gary	Hom, Kenneth
Fu, David	Greeno, J. Todd	Horner, Julie
Funderburk, Max H.	Greenstein, Bob	Horowitz, Evelyn
Fusco, Toni	Gregg, Joan	Hough, Bill
Gabriel, Patricia	Griffin, Scott	Howard, Marilyn Gaull
Gallo, Daniela	Gritzinger, Shane	Howard, Tyler
Galloway, Jeff	Grochan, Kathryn	Howe, George E.
Garcia, Frances	Groeneveld, Jim	Howe, Kevin
Gardell, Tracey	Grossman, Anna	Hung, Mike
Gardner, John	Grove, Charmian	Hunt, Kenneth
Garnett, Adam	Grubman, S	Hunter, Adam John
Garnett, Lucy	Guberman, Norman	Hupert, Nathaniel
Garraway, Selwyn	Gudaitis, Peter	Hurtado, Luis Fernando Perez
Garton, Mary	Guglielmo, Albert	Hyson, Rosemary
Gavito, Jennifer	Gunn, Ed	Iedbury, Michael
Gean, Sandra	Gupta, Udayan	Ihne, Ruth A.
Gehorsam, Robert	Guzman, Violet	Imhoff, Sandy
Giangola, Andrew	Guzzetta, Gregory	Inyard, James
Gibson, William	Haas, Wolfgang	Ismirnioglou, Robert
Gillis, Colin W.	Haber, Robert	Ivler, Loren
Girand, Mark	Habib, Charles J.	Jaber, Pamela
Glass, Catherin M.	Habib, Frances	Jacobson, Andy
Glasser, Karen	Hahn, Craig	Jalili, H. Michael
Glazer, Gene	Haines, Elizabeth	Jamilkowski, John
Glen, Nigel	Hall, Kathleen H.	Janecki, Antoinette
Glickman, Gail S.	Halpern, R.	Jason, Andrew
Glisson, Heather	Hanlon, John	Jedrlnic, Judith
Goff, Robert	Hans Jr., August E.	Jensen, Ruth
Goldberg, Dorothy	Hansen, Kathy	Ji, Helen
Goldberg, Leonard	Harris, Christine	Joffee, Atara
Goldman, Adam	Harrison, Mychal	Johnson, Ailauna C.
Goldstein, Joan	Harrison, Nate	Johnson, Daniel A.
Goldstein, Joshua	Hart, Cynthia	Johnson, Erik S.
Goldstein, Matthew	Hatch, Jerri	Jones, Lisa
Goldstein, Sharon	Hayes, Ryan Michael	Joseph, Maria
Gomes, Filomena	Hazelaar, Cor	Jossen, Stephanie Cassell
Gompertz, Fred	Helmerson, Karen	Judge, Julia
Gonda, Christine	Henry, J. Grant	Jue, Henry
Gonzalez, William J.	Herman, Ben	Juhasz, Patty
Goodkind, Thomas S.	Hertzberg, alyse	Jung, Ursila
Goodman, Cary	Hever, Ilana	Kahanov, Learan
Goodman, David	Heyel, Amy	Kahanov, Phoebe
Gordon, Bernice	Hill, Bryan	Kamps, Julie

Kanuri, Manohar	Lariviere, Donald	Lindsay, Roger R.
Karim, Shwan	Larsen, T. Patrick	Ling, Linda
Kaufman, Beatrice	Laspada, Tom	Liotto, Marie
Kaufman, Frederick	Latham, Bradley	Liu, Jevons C.
Kay, Jeff	Latham, Ruth	Liu, Shue Ming
Keane, Kelly	Lavin, Kelley	Livanis, Olga
Keane, Marie	Law, Lawman	Lividini, Craig
Keany, Sutton	Lawergren, Bo	Lo, Susan
Kefer, Paul J.	Lawlor, Mary Beth	Loader, Mark
Kefer, Ryan	Leather, Maria E.	Loeser, Richard
Keller, Brian	Lee, Andy	Logue, Brian
Kelley, Laura	Lee, Charlie	Lombardi, Joseph
Kelly, N.	Lee, Charlotte C.	Lonberg, Henrik R.
Kennedy, Justin D.	Lee, Joanne	London, William L.
Kiernan, Kathlene	Lee, Julius	Lopez, John B.
Kieves, Lawrence	Lee, Ken	Loscalzo, Lydia M.
Kimmelman, Miriam	Lee, Shew	Louie, Rita J.
Kimura, Miki	Lee, Sujin	Lown, Aaron
King, Clifford A.	Lee, Tony	Loyd, Beth
King, Larry D.	Lehane, Colleen	Lundgren, Annika
Kirk, Leo	Leibowitz, Irina	Lurz, Robert J.
Kirsch, Lisa	Lelli, Larry	Luther, Shawn
Klements, Jill	Lenahan, Daniel V.	M, Jane
Knaster, Suzanne	Lenhardt, Anesta	Machir, Stuart
Koethe, Amy M.	Leonard, Jeane	Mackay, Jonathan
Kohler, Jill	Leonard, Kelly	MacQuarrie, Kim
Kohs, Daniel	Lerner, Brad	Madorma, Francine A.
Konecna, Katka	Lerner, Diane	Magliulo, Michael
Kong, Myongsu	Lesser, Matthew	Magnusson, Stefan G.
Konopka, Julie	Letsou, Thomas C.	Mahoney, Janet S.
Koo, Jeffrey L.	Leung, Patrick	Maiden, Tom
Kozak, Susan J.	Leven, Adrienne J.	Mainz, Mark
Kozek, Bonnie L.	Levey, Jamie	Mannion, Loretta
Krebs, Carl	Levin, Sherwood	Manno, Karen
Krueger, Sam Quan	Levine, Bernard	Manos, Margaret
Krumholz, Beth	Levine, Denise	Margiotta, Paul
Kruse, Douglas C.	Levine, Izzy	Mari, Anouchka
Kuhn, Lucy	Levine, Jay	Mariama, James
Kula, Lyle	Levine, Marjorie	Marsh, George
Kung, Jasmin	Levinson, Janice Berman	Marshall, Eleanor
Kuruvila, Bikku K.	Levintow, Anthony	Marte, Ann
Kwan, Ed	Levitan, Leonard	Martin, Evan
Kwasnicki, Barbara A.	Levitt, Jill	Martinell, Tracy L.
Kwong, Henry	Lewis, Curtis	Marzullo, Kelly
L., April	Lewis, Marilyn	Massengill, David
Lacey, Lucille	Li, Karen	Matos, Ada
Lacucci, Tara	Li, Vicky	Matson, Gary
Lam, Mabel	Liem, Ronald	Mayer, Cynthia N.
Lam, Woon-Keung	Lifshitz, Howard	Mayesh, Stacey
Lancaster, Baylor A.	Lim, Catherine	Mazer, Leslie
Lane, Cynthia	Lim, Lisa	McAllister-Sinnott, Moya
Langhorne, Earnest	Linday, Nancy	McCall, Linda
Lansing, Mary Rose	Lindo, Arthur S.	McCarthy, Deirdre

McClintock, Robin	Murphy, Sheila	Pellathy, Louis
McCormack, Michael A.	Musaian, Mariana	Perez, Elsa
McElrath, Christine	Muthana, Dechu	Perez, Michelle
McGlynn, James	Myers, Scott	Peri, Vincent
McHugh, Megan	Natrella, Elizabeth S.	Perillo, Mary
McKee, Estee	Neikirk, Victoria	Perla, Susan
McKenzie, Sandra	Nevraumont, Peter N.	Persaud, Anthony
McNamara, Dedi	Newman, Catherin	Pershan, Julia
McNamara, Tim	Newmark, Craig	Pertose, Ron
McNeil, Elizabeth	Ng, David	Pestone, Carol
Meadow, Amy	Ng, Fay	Peterson, Doug
Meagher, Andrew	Nguyen, Tara	Phipps, Elena
Median, Jaime	Noiman, J.	Piccin, Susan
Medina, Luisa	Nominikat, Elke	Pietrangolare, Anthony
Meehan, Bill	Nordgren, Sandra	Pizzo, Anna
Mejia, Diana	Notaro, Anthoy	Plendner, Ilona
Meltzer, Tammy Ann	Noviello, Frank	Polifronio, Tracy
Mendelow, Rob	Oatman, Eric	Porta, Robert
Mendez, Antonio	Oberg, Lisamarie	Post, Karen
Merghoub, Samir C.	Oberliesen, Kirk	Powers, Caroline C.
Mettle, Steven	O'Brien, Jamie A.	Powers, Steve
Miklos, Danielle	O'Brien, Maureen	Presley, Kevin
Milius, Jason	O'Donnell, Steven	Quines, Alan
Milla, Eddie	Ogilvie, Peter	Raffle, Cary
Miller, Allan	O'Grady, Marijo	Ramos, Gloria
Miller, Kenny	Ojar, Shane	Rand, Elizabeth
Min, L. Talor	O'King, Arthur	Rao, Joe
Minelli, Robert	Olivo, Elena	Reeber, Patricia
Minsky, Barbara	Olson, Sabrina M.	Reeves, Natalie L
Mitchell, Seth A.	Omari, Zerouali	Regan, Michael FX
Mitchell, Sharon	O'Neill, Jr., Philip D.	Regelson, Esther
Moch, Cheryl	Ong, Melissa Zullo	Renda, Catherine
Mohl, Eric	Orczyk, Dorota	Reoch, Karen
Molinelli, Maria	Ortega, Debra	Repeta, Barbara
Mollica, Peter	Osen, Sharon	Rhei, Nancy
Monaco, Joan	Ost, John	Rice, Eric
Mongeot, Jacqueline	Ost, Kelly	Richardson, Virginia M.
Monjoy, Kim	O'Sullivan, May	Richberg, Mauri
Montefusco, Anthony	Overton, Leslie	Richman, Abraham
Montesione, Rob	Oyarvide, Irwing	Riedel, Sandra
Montfort, Ofelia M.	Pacetti, James	Rigg, Cynthia
Moon, Jeffrey A.	Padnani, Amy	Ritter, Maria Z.
Morgan, Owain	Page, Cristina	Rivernider, Cynthia
Mosbacher, Peter	Pak, Irene	Roberts, Corey C.
Moscaritolo, Ella	Palma, Mark G.	Roberts Jr., John E.
Moser, Ben	Palusamy, Cindy	Robinson, Maryse
Moy, Mary Ann	Paolicelli, Anthony	Robinson, Mensah
Muir, Robbi	Paran, Dganit	Rodriguez, Reinaldo
Mullan, Dan	Parker, John	Rogers, Kevin
Mullin, Tricia	Paterson, Arthur	Rohan, Christopher
Murphy, Deirdre	Pati, Toni	Roig, Emma
Murphy, John	Pede, Lawrence	Roina, Angela
Murphy, Mary Jo	Peifer, Patricia	Rome, Sterling

Romo, Mike	Schwartz, Robert	Smith, Patricia
Ronser, Eric	Schweitzer, Marc	Smith-Miller, Henry
Rosen, Scott	Scolaro, John A.	Snow, Tara
Rosen, Stacey	Seccuro, Liz	Sommer, Douglas A.
Rosenberg, Ben	Seigel, Joyce A.	Sorenson, Dale
Rosenberg, Jennifer S.	Serdan, Eliseo	Sowman, Alana
Rosenberg, Ken	Serpico, Phil	Spangler, Lois
Rosenthal, Steven	Setchim, David	Sparks, Georgia
Rosillo, Sal	Sgobbo, Jennifer	Sprinkle, Gwen
Rosner, Eric	Shafer, Aaron	Stalb, Elaine
Ross, Avidan	Shah, Rushin	Stanke, David E.
Ross, Kathleen	Shah, Sharmila	Stanton, Brain
Ross, Lynn	Shaheen, Dan	Stanuikynas, Richard
Ross, Ray	Shanet, Laurence	Starr, Jeff
Ross, Rob	Shapiro, Emily	Stefanski, Michael A.
Rothbloom, Richard	Shapiro, Jonathan S.	Stein, Linda
Rotter, Ann	Shapiro, Loretta M.	Steinberg, Ira A.
Rubinfiel, Leo	Shapiro, Rebecca	Steiner, Jon
Rudolph, Mark	Shapiro, Scott	Steketee, Paul
Ruffino, Debra	Shapiro, Stacey Cahn	Stelzer, Willow
Russo, Alyce	Sharkey, Catherine M.	Stemmler, Kenneth
Russo, Bridget	Sheffe, Edward	Stephens, James
Russo, Helena	Shelden, Brian T.	Stern, Anna
Ryan, Raymond F.	Shin, Namchul	Stern, Ben
Ryan, Ronald J.	Shio, Paul	Sternberg, Billy
Sabulis, John	Shipman, Olivia Cheatham	Sterritt, Virginia
Saez, annemarie	Shiva, Shahram	Stetler, Caroline
Saffer, Rhona	Shmueli, Zvi	Steuer, Arthur
Saieva, Frances	Shostak, Mitch	Stevenson, Amanda
Salameh, Majida	Shuler, Leona	Stewart, Virginia
Salzberg, Adele	Sica, Carmen	Stilwell, Jennifer
Sama, Gabriel	Sidoti, Nicholas	Stix, Margaret
Samet, Jessica	Sieh, John	Stopeck, Eugene
Sanborn, Cheryl	Siemens, Joy	Strait, Edward
Sanchis, Luis	Silkes, Veronica	Struass, Stuart
Santoro, Mike	Siller, Mary Colye	Stumacher, Carrie
Sarajian, Michael	Silva, Claudia	Sturm, Denise
Satanovsky, Simon	Silveira, Henrique	Sublette, Ned
Sauberman, Joshua	Silverman, Ellen	Sullivan, Patricia A.
Schaeffer, Rebecca	Simmons, John M.	Sultani, Durana
Scheafer, Toni	Simon, Jill	Sventon, Argus
Schenker, Deborah A.	Simonsen, Eric	Sweum, Ricky
Scherzer, Mak	Simpson, Alexandra	Swihura, Michael
Scheuer, John M.	Simpson, Fred W.	Switaj, Michelle
Schiller, Lisa	Singer, Roberta L.	Szybillo, Alicia
Schiro, Alice	Siniscalchi, Joe	Tada, Arnold K.
Schiro, Frank	Sinnreich, Gabreila	Takach, Karen
Schlissel, Betty	Sipos, Paul	Takahashi, Takuyo
Schneider, Paul	Skinner, David	Tanenbaum, Rich
Schneider, Sandra	Skolnick, Barry	Tang, Chuen
Schoenfeld, Bradley	Smith, Brett	Tardos, Anne
Schuhmacher, Belinda	Smith, Douglas	Tashman, Nona
Schuman, Patricia Glass	Smith, Maria	Tavormina, Mark

Taylor, Joshua	Vicente, Bernice	Williams, Michelle
Tentler, Gregory	Vidov, Victoria	Wilson, Adam
Terrusa, Sylvia	Villanueva, Ethel	Wilson, J
Themm, Caroline F.	Vincent, Edward	Wisner, Linda L.
Thienel, Ulrich	Vincent, Judith Margaret	Woerz, Jason H.
Thompson, Charles D.	Vincent, Milo	Wofford-Girand, Sally
Thompson, Eugene	Vonlehmdew, Joan	Wohlbruck, Nancy
Timm, Denis C.	Vono, Dawn	Wolchok, Robert L.
Tinio, Maricar	Waldman, Marcia	Wolf, Michael D
Tipert, Brett	Wallas, Yasmin	Wolfe, Michael
Tippett, Keri L.	Ward, Willie Mae	Wong, Annie
Tisch, Howard B.	Warshay, Robin A.	Wong, Ming Xin
Tomaselli, Jean M.	Waters, George	Wong, Theresa
Tomasino, Marguerite	Watson, Laura DiLallo	Woolsey, Kris
Tormo, Migdalia	Watson, Sandra	Worontzoff, Scott
Tornatore, Carolyn	Weatherford, Jeff	Wu, Fu-Shing
Torres, Joanne	Weber, Nathan	Wu, Joseph
Towey, Elizabeth	Weinberg, Judith	Wu, Jun Yi
Tramontano, Brian	Weinstock, Judith	Wu, Misty
Treacy, Dina	Weltman, Dean S.	Wu, Raymond
Treinen, Daniel L.	Wenden, Sally	Yasner, Leslie
Tse, Maritza	Werbel, Meirav	Yerkovich, Sally
Tucker, LaCanas	Wernhammer, Erika	Yeung, Janice
Ufnal, Andrew Z.	West, Joyce	Yohe, James
Uller, Deborah	Westhall, Suzanne	Yonker, Tiffany D.
Ulmer, Craig	White, Cynthia	Young, Robert
Ungoco, Joseph A.	White, Erik K.	Youssef, Michael
Urevith, Patricia	White, Greg	Yu, George
Ursitti, Joyce	White, Heather Anne	Yu, Margie
Vaccariello, Elizabeth	White, Mary	Yuan, Dorothy
Van Der Baan, Vanessa	Whitworth, Audrey	Zaczepinski, Ron
Vanderhoof, Leslie	Whyte, Michael J.	Zamarra, Galen
Vasquez, Manuel A.	Williams, Barry	Zane-Sadowski, Linda
Velez, Ernest	Williams, Jimmie E.	Zavattiere, Donna M.
Velez, Jacqueline	Williams, John R.	Zavier, Lauren
Verma, Amit	Williams, Laurieanne	
Zebro, Bob		
Zelinski, Karen		
Zemaitis, Amy		
Zhao, Su E.		
Zhong, Muzi		
Zhou, Polly		
Zieman, John		
Zinzar-Shulemovich, Svetlana		

****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, 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 11th Resident Issues

Six commenters felt that September 11th residents should not have to wait until renewing a lease before receiving the benefit. Two commenters felt that September 11th 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 11th 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 11th 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 11th 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 11th). 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 11th 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 11th 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 11th 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 11th \$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 11th 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 11th 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
Miglani, 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
Treffs, 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 suggested that preference be given to Lower Manhattan residents.

Businesses must be located south of 14th 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.