NYC Recovery | Community Development Block Grant Disaster Recovery

The City of New York Hurricane Sandy Action Plan Amendment 26 (Substantial)

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Approved by HUD: **TBD**

For CDBG-DR Funds, Disaster Relief Appropriations Act of 2013 (P.L. 113-2)

Hurricane Sandy hit New York City on October 29, 2012. The City of New York's (City) Action Plan describes how the City will use its award of Community Development Block Grant – Disaster Recovery (CDBG-DR) funds, received from the U.S. Department of Housing and Urban Development (HUD), to support recovery from Hurricane Sandy and to build a more resilient city. The programs in this Action Plan include programs to build and support housing, businesses, resiliency, and New York City infrastructure and other City services.

On May 7, 2013, HUD approved the City's initial Action Plan, which has since been amended several times through both substantial and non-substantial amendments. The entirety of the City's $4,213,876,000 CDBG-DR award for Sandy recovery and resiliency is described in the Action Plan, which is periodically amended to reflect program updates and revisions of unmet recovery needs.

Under the current Citizen Participation Plan, any change greater than $15 million in funding committed to a certain program, the addition or deletion of a program, or change in the designated beneficiaries of a program, constitutes a substantial amendment. Substantial amendments will be available for public comment for at least 30 days, during which time at least one public hearing will be held. Following the comment period, the City must submit the Plan to HUD for approval.

Action Plan Amendment (APA) 26 proposes to make the following changes to the Hurricane Sandy Action Plan:

1. Hunts Point Resiliency Program: Changes to the project scope and beneficiaries; and
2. Citizen Participation Plan (CPP):
    a. Simplifies the CPP to follow the same procedures regardless of which program(s) the City is proposing to change;
    b. Expands the number of languages into which Action Plan notices and executive summaries will be translated as required by Local Law 30; and
    c. Removes the requirement to hold a public hearing for each substantial amendment, which is no longer required pursuant to 87 FR 36869 (Section III).

APA 26 is a substantial amendment. **The comment period for APA 26 is open as of Tuesday, June 3, 2025. Comments must be received no later than Wednesday, July 2, 2025 at 11:59 pm (EST).**

Individuals will be able to read the Executive Summary of the amendment in English, Arabic, Bengali, Chinese (simplified), French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu. The online materials will also be accessible for the visually impaired. Written comments may be submitted to CDBGComments@omb.nyc.gov or to the Mayor's Office of Management and Budget, Attention: Julie Freeman, Senior Assistant Director, 255 Greenwich Street, 8th Floor, New York, NY 10007. Comments may be given in person at the public hearing listed below.

The public hearing schedule for proposed APA 26 is below.

Hearing information:

Date & time:

Monday, June 9, 2025
5:00 pm – 7:30 pm

Location:

The Point CDC
940 Garrison Avenue
Bronx, NY 10474

At the end of the comment period, all comments will be reviewed, and a City response will be incorporated in a Responses to Public Comments document. A summary of the comments and the City's responses will be submitted to HUD for approval as part of APA 26. The revised Action Plan and any public comments and responses will be posted on the City's CDBG-DR website at http://www.nyc.gov/cdbgdr.

City of New York: Eric Adams, Mayor
Jacques Jiha, Ph.D., Director, NYC Mayor's Office of Management and Budget

Date May 29, 2025

Summary of Action Plan Amendment 26 Changes

APA 26 makes the following changes to the City's Action Plan, in summary:

- Hunts Point Resiliency Program:
    - *X. Resiliency*
    - Pages 125 - 138
    - Changes to the project scope and beneficiaries
- Citizen participation Plan (CPP):
    - *XIII. Other Program Criteria*
    - Pages 171 - 174
    - Simplifies the CPP to follow the same procedures regardless of which program(s) the City is proposing to change;
    - Expands the number of languages into which Action Plan documents will be translated as required by Local Law 30; and
    - Removes the requirement to hold a public hearing for each substantial amendment, which is no longer required pursuant to 87 FR 36869 (Section III).

Changes to the following chapters will be made as a result of APA 26. These types of changes include updates to charts and text to be consistent with the changes described in this amendment.

Description of Action Plan Amendment 26 Changes

X. RESILIENCY

[Changes to Chapter X can be found on pages 125 through page 138 of the Action Plan.]

INTRODUCTION

When Hurricane Sandy hit New York City on October 29, 2012, it brought the vulnerabilities of coastal communities into stark relief. Following the storm, the Mayor of the City of New York established the "NYC Special Initiative for Rebuilding and Resiliency" Task Force, which released a report in June 2013 describing the damages and hardships experienced as well as strategies to build back stronger. With regard to Hunts Point, the report stated damage was minimal due to the timing of the storm's arrival coinciding with low tide in the Long Island Sound. However:

> "According to modeling undertaken by the storm surge research team at the Stevens Institute of Technology, if Sandy had arrived earlier – near high tide in western Long Island Sound, rather than in the New York Harbor and along the Atlantic Ocean – the peak water level in the western Sound, measured at the King's Point gauge, which hit more than 14 feet above Mean Lower Low Water, or MLLW (over 10 feet above datum

> NAVD88) during Sandy, instead could have reached almost 18 feet above MLLW (almost 14 feet above NAVD88).
>
> The result would have been devastating for infrastructure providing critical services to the rest of the City. Flooding could have overwhelmed parts of the Hunts Point Food Distribution Center (FDC) in the Bronx, thereby threatening facilities that are responsible for handling as much as 60 percent of the City's produce."

Hurricane Sandy highlighted the potential flooding vulnerability of the peninsula's critical facilities, other businesses, and the residential community to the effects of weather including sea level rise, storm surge, extreme precipitation events, extreme heat events, system-wide infrastructure outages, and building or sub-area level infrastructure outages.

Many areas in the City were significantly impacted by power outages caused by flooding. As a result of these outages, even the residents of buildings that were not flooded or had minimal damage were left without light, heat, refrigeration, or water for drinking, cooking, flushing toilets, or bathing. In high-rise buildings, elevators also ceased to function. Many older or infirm residents who lived on higher floors were trapped in their apartments, in some cases unable to communicate or gain access to information through television or the Internet.

The original Hunts Point Lifelines Rebuild by Design (RBD)proposal addressed resiliency through four Lifelines: Integrated Flood Protection, Livelihood and Community Resilience, Cleanways, and Maritime Supply Chain. Through a year-long community engagement process, the City worked with stakeholders from community groups, elected officials, and local businesses to identify resilient energy as the priority for the pilot project. The revised project description in this Action Plan Amendment reflects the variation of the Hunts Point Lifelines "Cleanways" proposal to develop backup energy generation to ensure that the Hunts Point residential community and the FDC is resilient to power outages from flooding and other emergency events.

In June 2014, HUD announced CDBG-DR funding awards for the implementation of selected RBD proposals. HUD awarded the City $20 million for the Hunts Point Lifelines RBD proposal to advance "continued robust planning and study related to the future of the food market and a small pilot/demonstration project (to be selected by the City)." In an April 2015 amendment to the City's CDBG-DR Action Plan, the City supplemented the original RBD award with the allocation of an additional $25 million of CDBG-DR funds, bringing the total investment towards the first stage of resiliency improvements in Hunts Point to $45 million. In May 2018, the City added $26 million in City capital funds, and in April 2022 the City added an additional $10.6 million in City capital funds, bringing the total project funding to $81.6 million. In June 2020, the City reallocated $25 million from the total CDBG-DR funding of $45 million, leaving the original $20 million RBD award. Those funds were replaced with $23.5 million in City capital funds and $1.5 million in New York City Economic Development Corporation (NYCEDC) funds, maintaining the total project funding of $81.6 million.

In consultation with local elected officials, community and civic groups, and business interests, NYCEDC and the former Mayor's Office of Resiliency (MOR) formed the Advisory Working Group (AWG) to further develop resiliency priorities and recommendations that build upon the ideas presented in the RBD proposal and other ongoing resiliency and planning initiatives in Hunts Point. From June to September 2015, the AWG convened for seven meetings (including two meetings with

the general public), worked through exercises to better understand Hunts Point's vulnerabilities to flooding, developed selection criteria for identifying priority resiliency categories, and recommended principles to be pursued in the implementation of any resiliency projects (see Appendix A for the Advisory Working Group Implementation Principles).

Understanding that only one pilot project would be advanced through implementation with the total available $81.6 million in funding, but that additional resiliency categories could be concurrently advanced through the feasibility study phase, the AWG reached consensus on two priority categories – both to be advanced with further planning and feasibility analysis, and one to be advanced through implementation of a pilot project.[3]

The two resiliency categories identified for further study by the AWG were "Power/Energy" and "Coastal Protection," referred to herein as "Energy Resiliency" and "Flood Risk Reduction." Based on these AWG recommendations, as well as *OneNYC: The Plan for a Strong and Just City* goals, HUD requirements, and City resiliency priorities, the City identified the "Energy Resiliency" category for implementation through a pilot project.

PROJECT DESCRIPTION

The Hunts Point Resiliency Project (HPRP) outlined in detail below will reduce the vulnerability of the Hunts Point peninsula to impacts of coastal flooding by providing at least three days of reliable, resilient, and dispatchable power to critical local and citywide facilities in the event of an emergency, such as a power outages and other threats.

Project Context

The Hunts Point peninsula is an area of regional and local significance in the southeast Bronx (see Appendix H, Figures 1 and 2). The peninsula is surrounded by the Bronx River and the East River, an estuary of the Atlantic Ocean. The area is home to an active and engaged community of 12,300 residents as well as the FDC, one of the largest wholesale food distribution centers in the United States, numerous light manufacturing and other businesses, and one of the City's largest wastewater treatment plants. The peninsula is divided by north-south oriented Halleck Street with the FDC to the east and a residential community and industrial zone to the west.

The recommendations from *A Stronger More Resilient New York*, *OneNYC*, Hunts Point Vision Plan, RBD, and other community-based and government efforts highlighted the vulnerability of the peninsula with respect to sea level rise, storm surge, extreme precipitation events, extreme heat events, system-wide infrastructure outages, and building or sub-area level infrastructure outages based on the experiences and lessons learned across the region since Hurricane Sandy.

The resiliency of the Hunts Point peninsula is critical from both a local and citywide perspective. First, Hunts Point residents face disproportionate environmental burdens. Like all of New York City, Hunts Point is classified as a moderate non-attainment area for 8-hour ozone.[4] Due to significant air quality emissions from trucking and other industrial sources, Hunts Point residents experience asthma rates twice as high as New York City as a whole. Respiratory illness has led to 2.8 times more emergency room visits attributable to asthma from poor air quality in Hunts Point compared to the rest of the

[3] https://edc.nyc/sites/default/files/2025-01/Hunts-Point-Resiliency-Working-Group-Recommendations-FINAL.pdf
[4] https://www3.epa.gov/airquality/greenbook/ancl.html

city. As outlined in the Section IV (Stakeholder Engagement Plan) and Appendix A (Advisory Working Group Implementation Principles), the City has prioritized meaningful involvement of the Hunts Point community with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. HPRP aims for the Lowest Achievable Emission Rate that goes above and beyond mandated mitigation controls to address local air quality and sustainability concerns of the low- and moderate-income populations affected by the project.

The resiliency of Hunts Point also directly affects the resiliency of the citywide food supply. Hunts Point is the largest geographic hub for food distribution by volume in New York City. The 329-acre FDC campus houses a significant cluster of food distribution and manufacturing facilities, including large Produce, Meat, and Fish Markets. Together, these facilities distribute 4.5 billion pounds of food annually to New York City and the broader metropolitan area and provide 8,500 direct jobs. HPRP will help protect and ensure access to food for millions of New Yorkers. The FDC land is owned by the NYC Department of Small Business Services (SBS) and managed by the NYCEDC.

Given the overall project objectives (described below under Project Objectives), evaluation criteria applied to select the Energy Resiliency pilot project to be funded by HUD (described in more detail below under Project Identification), and the AWG's Implementation Principles (in Appendix A), clean and renewable technologies were identified, assessed, and prioritized as part of HPRP for implementation as part of or in parallel to the preferred pilot project. As part of the operations plan for the technologies to be implemented, non-renewable technologies will only be operated under emergency conditions and with restricted durations.

Project Identification

In June 2016, the City completed a risk and vulnerability assessment of the Hunts Point peninsula and feasibility studies for energy resiliency and flood risk reduction project options to reduce those vulnerabilities. The scope of work also included the conceptual design and environmental review for HPRP and a robust stakeholder and community engagement process to inform the study and pilot project.

The methodology used for the risk and vulnerability assessment was adapted from procedures established by the Federal Emergency Management Agency (FEMA) for identifying the likelihood and potential consequences of threats. For HPRP, existing conditions data were overlaid with the latest projections from the New York City Panel on Climate Change (NPCC), FEMA Preliminary Flood Insurance Rate Map (PFIRM) data including potential inundation depths with sea level rise (see Appendix H, Figure 3), historic data reflecting actual storms and outage events, and newly collected data from stakeholders (utility system providers, businesses, and residents) about critical facilities within the Hunts Point peninsula. The study assessed facilities important to the continued provision of critical citywide and community services, such as emergency services, housing, mobility, power and water delivery, social services, employment, and food distribution.

Each critical facility's vulnerability was assessed by identifying threats facing the facility, then multiplying the likelihood by the consequence of each relevant threat. Threats assessed included flooding because of sea level rise, coastal storm surge, and extreme precipitation events, as well as extreme heat events, system-wide infrastructure outages, and building-level infrastructure outages. A composite vulnerability score for each critical facility was then developed by adding the different

threat-specific vulnerability scores together to compare and rank the vulnerability of each critical facility to another. See Appendix H, Figure 4 for the results of this vulnerability assessment.

Based on the risk and vulnerability assessment findings, building-level power outages were determined to be a significant and shared threat to residents and businesses in Hunts Point. In addition, the low-lying areas of the peninsula face significant threats from coastal flooding while the upland residential area does not due to considerable elevation change throughout the peninsula. Based on the composite vulnerability scores, the most vulnerable critical facilities include FDC facilities—a key economic and food distribution center—that are vulnerable to building-level energy outages, system-wide outages, storm surge, and extreme heat events (see Figure 4). Food Center Drive, the main thoroughfare within the FDC, would be flooded in a 100-year storm tide that accounts for sea level rise in the 2050s. Community facilities, specifically two local schools, PS 48 and MS 424, are vulnerable to energy outages and extreme heat. HPRP reduces the vulnerability of Hunts Point to power outages caused by emergency events, such as a major flood, through the lens of resilient energy provisions.

The risk and vulnerability assessment identified the critical facilities in greatest need and potential opportunities for resiliency projects. For energy resiliency, dozens of power generation, distribution, and storage technologies were first screened to determine if technically feasible and those retained were further assessed based upon a set of criteria including:

- Resiliency: applicability to vulnerable, critical facilities; dispatchable; reliable for minimum of three days; independent utility
- Sustainability: emissions, efficiency, fuel sources
- Community benefits: workforce opportunity, scalability, potential to leverage other funds
- Constructability: suitable space, required infrastructure, permitting
- Feasibility: schedule, cost to construct, cost/MWh

It is important to note that no single project meets all the criteria above for all of the vulnerable facilities in the peninsula. These criteria identified technologies (i.e., solar photovoltaic [PV], battery energy storage system [BESS], and backup power generation) for detailed assessment that were then packaged into project options that would ensure resiliency, constructability, and implementation, while at the same time maximizing sustainability and community benefits.

The original energy resiliency pilot project as defined in APA 18 was a tri-generation facility with a microgrid for power distribution, solar PV with BESSs, and mobile generators to provide a cumulative generating capacity of approximately 6.8 megawatts (MW). However, this pilot project encountered the following challenges during final design:

- Elimination of an end user for the tri-generation facility (the Meat Market opted out of receiving hot water);
- Potential Produce Market redevelopment that would replace all buildings and trailer refrigeration units (TRUs) with new construction;
- City and State policies and regulatory requirements to restrict local greenhouse gas emissions with penalties imposed; and

- Cost saving strategies identified during conceptual design did not reduce total project costs to within available funding limits.

To address the combination of these factors, the tri-generation facility components of the original pilot project were evaluated and modified as part of APA 24. The amended energy resiliency pilot project reduced in size and scope yet still achieved the principal project objectives and supports subsequent project phases to achieve a larger vision of energy resiliency that is consistent with evolving City and State carbon neutrality goals. As such, the pilot project was redefined to provide backup energy generation for the Produce Market with a natural gas-fired generation facility, and one other FDC facility (600 Food Center Drive), which will be backed up with a stationary diesel generator to be used during emergency periods. Some of the primary community facilities (MS 424 and PS 48) on Hunts Point Peninsula will be provided solar PV plus BESSs for resiliency and sustainability similar to the original pilot project.

The modified project covered under APA 24 faced further challenges with additional changes required. The changes were made to address the following actions related to Hunts Point peninsula facilities:

- Redevelopment of the Produce Market described above, which included redesign to the power supply systems and associated backup power.
- Continuous rise in the cost of the backup energy generation project.
- More changes to the City and State policies with an emphasis on reducing greenhouse gas emissions and increasing renewable energy and energy storage generation.

To address these factors, the proposed natural gas-fired backup energy generation facility for the Produce Market was redefined for providing backup energy generation for the Fish Market (instead of the Produce Market). The generation is proposed to utilize solar PV generation and BESS. The Fish Market will be also equipped with temporary generator quick connect equipment to allow the connection of a mobile diesel engine generator(s), which may be needed during extended power outages when the stored energy from the BESS is completely depleted before grid power is restored. No changes were made to the previously proposed stationary diesel backup generator for 600 Food Center Drive and to the solar PV plus BESS projects to community facilities (MS 424 and PS 48). The cumulative generation capacity of the modified pilot project is up to approximately 5 MW, and this capacity could be increased further up to 7.3MW (with the BESS systems included).

PROJECT OBJECTIVES

The principal objectives of HPRP are to:

- Address critical vulnerabilities for both community and industry;
- Protect important citywide infrastructure during emergencies such as a major flood;
- Protect existing and future industrial businesses and jobs;
- Support the community's social, economic, and environmental assets; and
- Use sustainable, ecologically sensitive infrastructure.

DESCRIPTION OF PREFERRED PILOT PROJECT

HPRP will provide reliable, dispatchable, and sustainable power to identified critical facilities on the Hunts Point peninsula for three days in the event of an emergency. In total, the project provides up to approximately 7.3 MW of new resilient energy generation capacity for the peninsula. Each component of the pilot project has independent utility. These separate components do not rely on each other to provide resiliency to the intended facilities. At the same time, they are conceived as a suite of projects to provide resiliency to the most vulnerable and critical facilities within Hunts Point.

Backup generation to support the Fish Market in the Food Distribution Center (FDC) – This component involves a backup generation system that will supply electrical power to the Fish Market in the near term and anchor a future microgrid with distributed energy resources (DERs) to achieve long-term sustainability and resiliency throughout the peninsula. The backup generation system will consist of a 4 MW rooftop and canopy solar system, and a 2 MW/5 MWh BESS to enable the "black start" of the facility and support load management at the Fish Market during emergency conditions. The PV solar generation system is designed to operate in parallel with the grid providing sustainable power during normal conditions. During emergency conditions, the solar and BESS will provide backup power to the Fish Market.

In addition, NYCEDC will pay for a temporary, rented, mobile diesel generator to be deployed in emergency conditions. The mobile diesel generator will extend the reliability of the Fish Market electrical needs for up to three days, if needed. The use of rented generators will only be required for an extended outage period in the short term as EDC explores a larger vision of incorporating additional BESS system at the Fish Market. The proposed solar PV and BESS would be located at the Fulton Fish Market located at 800 Food Center Drive, Bronx, NY 10474 on Block 2780, Lot 73.

Community Facility Solar/Storage Installations – To provide sustainable and resilient power supply to two primary community facilities, the project involves the installation of rooftop solar PV generation and BESSs for both MS 424 and PS 48 (currently under construction). The total supported installation is approximately 0.5 MW of solar capacity that will provide electricity to the schools during normal and emergency conditions. BESSs will provide electrical resiliency for critical loads during emergency conditions. This will enable the schools to provide shelter, refuge, or gathering spaces for the public in emergency situations. The solar and storage systems are also intended for use during blue sky days. The two rooftop solar sites are located at: MS 424, 730 Bryant Avenue, Bronx, NY 10474 on Block 2763, Lot 279; and at PS 48, 1290 Spofford Avenue, Bronx, NY 10474 on Block 2766, Lot 1.

Emergency Backup Generation for Businesses – To provide resilient power supply to other buildings in the FDC, the project includes the purchase of one 0.5 MW stationary diesel generator and the installation of a connection to the electrical system at Citarella/Sultana facilities located at 600 Food Center Drive. The generator would no longer be a mobile generator and would be permanently installed to operate during emergency conditions only and for periodic testing and maintenance during the year. The generator will enable immediate energy resiliency with minimal capital construction costs for facilities that are critical to the city's food supply chain. A Tier 4

certified engine will be used to control and treat emissions. Emission rates will be specified as a condition of generator unit operating permits to be enforced by both the New York State Department of Environmental Conservation (NYSDEC) and the New York City Department of Environmental Protection (NYCDEP). Permit requirements will be specified to equipment suppliers and/or contractors and guaranteed by the equipment suppliers as a condition of facility installation. Ongoing compliance with these emissions rates and permitted hours of operation will be a condition of facility management. The proposed generator would be located at Citarella/Sultana's facilities at 600 Food Center Drive, Bronx, NY 10474 on Block 2781, Lot 500.

MEETING THE PURPOSE AND NEED

HPRP will reduce the vulnerability of the Hunts Point peninsula to impacts of coastal flooding by providing at least three days of reliable, resilient, and dispatchable power to critical local and citywide facilities during emergency events like Hurricane Sandy, power outages, and other threats.

HPRP addresses the critical facilities most vulnerable to coastal storms and has independent utility to protect important local and citywide infrastructure under future conditions. The analysis accounts for baseline data of historic outage frequencies and durations, as well as anticipated outage frequencies and durations in the future due to an expected increase in flood-related events.

Due to the critical nature of facilities within the Hunts Point peninsula and based upon policy guidelines and precedents, the City has defined resiliency as the ability to provide a reliable source of power for a given facility's critical load for a minimum of three days in the event of a major flood or other emergency. The overall project incorporates a combination of solar PV solutions with BESSs to operate during both blue sky and emergency conditions and backup power generation to operate during emergency conditions only. The configuration of these technology packages means that each protected facility will have dispatchable energy resiliency for at least three days in the event of an emergency.

HPRP will be designed to incorporate flood protection measures; protect food-related inventory and enable citywide food distribution for facilities within the FDC; and allow the schools in the Hunts Point residential neighborhood to serve as shelters, refuge, or gathering spaces during floods, outages, heat waves, or other emergency situations.

The pilot project will address environmental burden concerns in recognition of the importance of emissions and air quality in Hunts Point. Hunts Point (like all of New York City) is considered to be a moderate non-attainment area for 8-hour ozone. This classification mandates emission control technologies to meet the Lowest Achievable Emission Rate. Due to the air quality and environmental burden concerns in the neighborhood, the pilot project will include emission controls including Selective Catalytic Reduction systems for control of nitrogen oxide emissions as well as the installation of oxidation catalysts for control of carbon monoxide and volatile organic compounds exiting the generating units at Site D. Emissions from the diesel stationary generator at 600 Food Center Drive would be controlled to below standards through utilization of a Tier 4 certified engine. In addition, the diesel equipment implemented as part of this pilot project would be used only in the event of an emergency, such as a power outage, and would not exceed hours of operation specified in NYSDEC and NYCDEP air permits and registrations.

RESILIENCE PERFORMANCE STANDARDS

The City of New York is committed to developing and implementing resilience performance standards for all infrastructure projects, including HPRP, and looks to the best available science and promising practices in resiliency to inform the development of these standards.

The City uses the following performance standards to measure resiliency within a project:

- Robustness: ability to absorb and withstand stressors and shocks.
- Redundancy: additional channels to enable maintenance of the core functionality in an event of disturbance or system failure.
- Resourcefulness: ability to adapt and respond in a flexible manner during stressors and shocks.
- Response: ability to mobilize quickly in the face of stressors and shocks.
- Recovery: ability to regain functionality after stressors and shocks.

As design progresses, the specific application of these standards to HPRP will continue to be further developed and refined to accurately capture the effectiveness and efficiencies of the resilient technologies once installed.

To ensure the energy infrastructure is itself resilient to flooding and to comply with resilience performance standards, all of the energy systems will be flood-protected, elevated, or located outside identified flood hazard areas. The backup generation facility, which will be situated at Site D within the mapped 100-year floodplain, will be elevated above of the floodplain to 19 feet NAVD88.

Conduits that are at risk of flooding will be hardened. Each component of HPRP provides an added level of energy redundancy to the facility it is designed to protect. As a result, critical facilities will have the redundancy to obtain energy supply even if there is a broader power outage in the larger grid network. The capital components of the project that provide resiliency and redundancy benefits will be paired with an operations plan for the City and FDC tenants. The project enables the schools and FDC facilities to be responsive to and recover from shocks and stresses because the project components will be equipped with black start capabilities, which refers to the ability to restoring power from a total or partial shut-down.

Rooted in these resiliency performance standards, the City will advance a plan to monitor and evaluate the energy resiliency infrastructure developed through this RBD initiative. The purpose of this plan is to convey how the City will monitor the planning, implementation, and achievement of key milestones in the delivery of the completed project. The plan will include inspection requirements for the resilient energy infrastructure based on manufacturer specifications around inspection frequency and process. The specific inspection requirements will be finalized once equipment specifications are determined during final design.

During implementation of the monitoring plan, the City will ensure that all the appropriate mitigation measures are put into place and meet government standards. The plan will also include evaluation methodology, which the City will implement after the projects are complete. The purpose of the evaluation methodology is to determine the project's efficacy level in addressing the community

needs over a period of time. Components of the evaluation methodology may include the use of data to establish a baseline, monitor progress over a designated period of time, and establish benchmarks to gauge the effectiveness of the project against anticipated outcomes.

The City will be vigilant in doing immediate assessments after future storms events. The City will provide monitoring or assessment of the structures and equipment to see if they can withstand storm and hurricane conditions. This will be reported to the appropriate City departments to address any failures in structures and equipment. Additionally, the City will explore standards for the replicability of this type of infrastructure.

PROJECT FEASIBILITY AND EFFECTIVENESS

The feasibility assessment conducted as part of HPRP was a key part of the process to identify the pilot project for energy resiliency. The packaging of different technologies into HPRP optimizes the resiliency goals set forth in this project with the community's sustainability goals and environmental health concerns. HPRP includes latest emission control technologies and flood protection measures in capital costs and designs. To ensure that the energy infrastructure is itself resilient to flooding and to ensure compliance with the City's resilience performance standards, all of the energy systems will be flood-protected, elevated, or located outside identified flood hazard areas.

Feasibility assessments considered the appropriate code and industrial design and construction standards to implement packages of energy resiliency technologies. These codes and standards will be adhered to during final design of the pilot project, and a registered professional engineer will certify that the final design meets all applicable codes and standards prior to the obligation of HUD funds by the City for construction.

Con Edison is a key coordination partner for the design and construction of HPRP. A series of meetings with Con Edison's regional engineering team were held to review the specifications of the HPRP energy generation facilities and the interconnections between the facility, Con Edison's existing infrastructure, and the Produce Market. The meetings also involved preliminary planning discussions of a future microgrid that may be built in subsequent phases of the project. The City and Con Edison continue to coordinate regularly to ensure successful implementation of the pilot project as well as the broader vision for resilient and renewable backup power serving multiple facilities and tenants on the Hunts Point peninsula.

Once HPRP is constructed, the City will operate and maintain the energy systems. NYCEDC, which manages the FDC on behalf of the City, will oversee the operations and maintenance of the backup generation facilities. The NYC Department of Education (DOE) will operate and maintain the solar PV and BESSs at the schools. This will include regular inspections in accordance with appropriate industry codes and regulations. The City of New York hereby certifies that funding will be made available to cover the long-term operations and maintenance costs associated with HPRP.

PROJECT FUNDING

A total investment of $81.6 million in Federal CDBG-DR and City funds ($20 million via the RBD program, $60.1 million in New York City capital funds, and $1.5 million in NYCEDC funds) is dedicated to the "continued robust planning and study related to the future of the food market and a small pilot/demonstration project." These funds will be used for planning, design, and project construction of HPRP, and are eligible for reimbursement under HUD's RBD program. Planning work includes

feasibility analyses, conceptual design, and environmental review; design includes contracting, permitting and full design; and project construction includes procurement, construction, and construction management activities. If the project generates program income, the City will coordinate with HUD that the program income would flow back to the City's CDBG Entitlement program.

Federal, State, and Local Coordination

Implementation of HPRP will involve federal, state, and local permits and authorizations. As described above (under Project Identification), the scope of work for HPRP included multiple assessments and evaluations to identify the energy resiliency pilot project. The pilot project has been identified, and the project has advanced to conceptual design and environmental review.

APA 18 identified and described the permits and authorizations that will be obtained for the project as design begins and the awarded contractors prepare for construction. When changes result from coordination with or approvals by permitting agencies, the City and NYCEDC will submit a Substantial Action Plan Amendment to HUD describing these changes and the modified project.

The agencies involved in the environmental review, permitting, and approvals for the pilot project and the timing of these processes are described below in Table 4. The process mapped below is based on the identification of the energy resiliency pilot project and HUD funding schedule (described in the Project Funding section above). Additional design and construction schedule information for the pilot project is provided below in Section V. Project Timeline.

The City is currently working with the Sandy Regional Infrastructure Resilience Coordination (SRIRC) to coordinate design, permitting, construction and operation of this project to align and integrate with other recovery projects in the area. Additionally, the City will continue to work with the SRIRC's Technical Coordination Team (TCT) and the Federal Review and Permitting (FRP) Team as the project is further defined during the design and environmental review process.

Table 4: Permits/Approvals and Related Schedule Information

Agency/Authority	Permit/Approval	Timing
Federal		
U.S. Department of Housing and Urban Development	Federal funding agency; Approval of this Substantial Action Plan Amendment; and final issuance of Authority to Use Grant Funds (AUGF) for the CDBG-DR funds	Substantial Action Plan Amendment Approval: Fall 2018 NEPA Finding of No Significant Impacts (FONSI) issued September 2019 AUGF for CDBG-DR Funds issued November 2019
U.S. Fish and Wildlife Service	Section 7 of the Endangered Species Act (ESA) Consultation	Completed 2018

Agency/Authority	Permit/Approval	Timing
State		
Office of Parks, Recreation and Historic Preservation (OPRHP)	Section 106 consultation required per the National Historic Preservation Act (NHPA) with respect to eligible and listed properties on the State & National Registers of Historic Places.	Completed September 2019
NY Independent System Operator (NYISO)	Performance of Interconnection Process and Study.	Summer 2025 to Summer 2026
Department of Environmental Conservation (NYSDEC)	State Facility Air Permit (Subpart 201-5)/ Subpart 201-4: Registration of Minor Facility	State Facility Air Permit: Spring 2025 to Fall 2026 (by Contractor)
	Petroleum Bulk Storage Program Registrations Issuance of permits related to the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity	Petroleum Bulk Storage Program Registrations: Spring 2025 to Fall 2026 (by Contractor) SPDES GP: Fall 2025 to Fall 2026 (by Contractor)
	Natural Heritage Program Consultation on State-listed plant or animal species or significant natural communities	Completed 2018
Department of State (NYSDOS)	NYS Coastal Zone Consistency Determination	Completed 2019
Department of Transportation (NYSDOT)	Issuance of Highway Work Permit, Special Hauling Permit/Divisible Load	Fall 2025 to Fall 2026 (by Contractor)
	Revocable Consent	Fall 2025 to Fall 2026 (by Contractor)
City		
Department of City Planning (DCP)	NYC Waterfront Revitalization Program (WRP) Consistency Determination	WRP Consistency: Completed 2019

Agency/Authority	Permit/Approval	Timing
Department of Environmental Protection (DEP)	Air Pollution Registration (Engines, Generators, Turbines) Asbestos Abatement Compliance through the Asbestos Reporting and Tracking System (ARTS) Approval of City sewer and water connections for new connections or modifications of existing connections	Air Pollution Registration: Spring 2025 to Fall 2026 (by Contractor) ARTS Compliance: Spring 2025 to Fall 2026 (by Contractor) Water and Sewer Connections/ Modifications: Fall 2025 to Fall 2026 (by Contractor)
Department of Buildings (NYCDOB)	Review of design and issuance of construction work permits related to addition of distributed generated sources including compliance with the City's Building, Electrical, and Zoning Codes Office of Technical Certification & Research (OTCR) review and approval of battery storage plans	Construction Work Permit(s): Summer 2022 to Fall 2026(by Contractor) OTCR Approval: Summer 2023 to Fall 2026 (by Contractor)
Department of Transportation (NYCDOT)	Approval of Maintenance and Protection of Traffic Plan (MPT)	Fall 2025 to Fall 2026 (by Contractor)
Public Design Commission (PDC)	Review of project design	Initial coordination begins with concept design. Coordination began in Spring 2021; final approvals would be required for final design completion in Fall 2025
Landmarks Preservation Commission (LPC)	Advisory agency for activities on or near sites of historic or archaeological value.	Completed 2019
New York City Fire Department (FDNY)	Design review of battery storage plans by FDNY Technology Unit.	Summer 2023 to Fall 2026
Office of Management and Budget (OMB)	Responsible Entity (RE) for the disbursement of CDBG-DR funds for Hurricane Sandy from HUD to City agencies and NEPA Lead Agency.	NEPA Review: Summer 2018 to Spring 2019

Agency/Authority	Permit/Approval	Timing
Mayor's Office of Climate and Environmental Justice (MOCEJ)	Design review of activities and projects proposed to increase resiliency, including strengthening neighborhoods, upgrading buildings, adapting infrastructure and critical services, and strengthening coastal defenses.	Spring 2023 to Fall 2023
New York City Emergency Management (NYCEM)	Review of plans related to emergency preparedness, response, and operations under storm conditions.	Summer 2023 to Spring 2024
Small Business Services (SBS)	CEQR lead agency for NYCEDC; help City agencies fulfill their environmental review responsibilities. Issuance of Waterfront Permit for developments within the NYC waterfront, and review of resiliency related design coordinated with the DOB's permit(s).	Issued CEQR Negative Declaration in August 2019. Fall 2025 to Fall 2026 (by Contractor, as applicable)
Other		
Utility Companies Approvals (Con Edison)	Issuance of permission to cross existing utilities.	Summer 2023 to Fall 2026 (by Contractor, as applicable)

CDBG-DR ALLOCATION: $20,000,000

HUD ELIGIBILITY CATEGORY: Housing Rehabilitation and Preservation, per waiver in August 25, 2015 Federal Register Notice (80 FR 51589)

PROJECTED ACCOMPLISHMENTS: Reliable, resilient, and dispatchable power to critical load and citywide facilities during emergency events like Hurricane Sandy, power outages, and other threats.

NATIONAL OBJECTIVE: Low- and Moderate-Income Area Benefit

XIII. OTHER PROGRAM CRITERIA

[Changes to Chapter XIII can be found on pages 171 through page 174 of the action plan.]

Citizen Participation Plan (CPP)

CDBG-DR Website
In accordance with CDBG-DR requirements, the City of New York has developed and will maintain a comprehensive website regarding all CDBG-DR-funded activities. The City will post all Action Plans and amendments on the City's CDBG-DR website (www.nyc.gov/cdbgdr) to give citizens an opportunity to read and comment on the Plan and any amendments. This website is featured prominently on, and is easily navigable from, the City's Recovery homepage (www.nyc.gov/recovery).

Comments on the Action Plan, as well as other comments or citizen complaints, may be submitted as follows:

- Via email to CDBGComments@omb.nyc.gov
- Via mail to: Mayor's Office of Management and Budget, 255 Greenwich Street, 8th Floor, New York, NY 10007
- By telephone by contacting 212-788-6130.

Public Notices and Comment Periods
In the case of Action Plan amendments, the City will follow two citizen participation processes:

- **Substantial Amendment:** A substantial amendment shall be defined as: a change in program benefit, beneficiary or eligibility criteria; the allocation or re-allocation of more than $15 million; or the addition or deletion of an activity. For substantial amendments, the procedures detailed below would be followed.
- **Minor / Technical Amendments:** For amendments not meeting the definition of a substantial amendment, the City shall notify HUD, but public comment is not required.

Every amendment, substantial or not, shall be numbered sequentially and posted on the website.

At the end of a comment period, the City will review and respond to all comments. Responses will be incorporated into the City's Responses to Public Comments document, which will be submitted to HUD with the Action Plan. A revised Action Plan including the public comments and responses will be posted on the City's CDBG-DR website.

Public notices announcing public comment period dates associated with Action Plan substantial amendments will be published in the following newspapers:

- Bronx Times Reporter
- Brooklyn Daily Eagle
- New York Daily News
- New York Post
- Newsday Queens Edition
- Staten Island Advance

- The Wave
- Foreign Language Newspapers:
    - El Diario
    - Russkaya Reklama
    - Sing Tao Daily

Please note that HUD no longer requires public notices associated with environmental reviews to be published in newspapers. Instead, the City will publish such notices in the *City Record*, have notices translated into the languages identified in this CPP, and post notices on the City's CDBG-DR website. The notices will identify the comment periods for each notice and the instructions for reviewing Environmental Review Records.

Individuals with Limited English Proficiency (LEP)
An Executive Summary of each substantial amendment and the associated public notices will be available in English and translated into Arabic, Bengali, Chinese (simplified), French, Haitian Creole, Korean, Polish, Russian, Spanish, and Urdu in accordance with Local Law 30. Copies of these documents will be posted on the City's CDBG-DR website. Print copies will be available by request. The City will make every possible effort to translate and consider comments submitted in any other language within the timeframe.

Persons with Disabilities
Hard copies of Action Plan Executive Summaries will be available in large print format (18pt font size) upon request. The online materials will also be accessible for the visually impaired. For more information on how people with disabilities can access and comment on the Action Plan, dial 311 or, using a TTY or Text Telephone, (212) 504-4115.

The Final HUD-Approved Action Plan
Following HUD approval of the Action Plan, it will be posted on the City's CDBG-DR website. Copies of the Final Action Plan will also be made available upon request.

Response to Citizen Complaints
The City of New York shall provide a written response to every complaint relative to the CDBG-DR grant within fifteen (15) working days of receipt if practicable.

Performance Review
The requirements for submission of a Performance Evaluation Report (PER) are waived for the CDBG-DR program. As an alternative, the City must prepare, release for public review, and submit to HUD Quarterly Performance Reports (QPR) no later than thirty days following the end of each quarter. QPRs must be submitted until all funds have been expended. QPRs shall use HUD's Disaster Recovery Grants Reporting (DRGR) system and be posted on the City's website within three days of submission.

Public Hearings
As of June 21, 2022, public hearings for substantial amendments are no longer required (see 87 FR 36869, Section III). However, the City will consider scheduling public hearings for amendments on an as-needed basis. If a hearing is scheduled, the City will provide a limited number of translated

copies of the Action Plan Executive Summary in the 10 languages specified in this CPP. Copies of these documents will remain posted on the City's website.

Interpretation services in the languages identified in this CPP will be available for hearings by request five days in advance of a hearing. The City will also make reasonable efforts to provide interpretation services in other languages upon request.

Rebuild by Design

The City received funding for two Rebuild by Design projects: East Side Coastal Resiliency (ESCR) and the Hunts Point Resiliency Project (HPRP). These projects were selected through a competitive process by HUD and involved transparent and inclusive community outreach and public participation.

The City previously established individualized Citizen Participation Plans for each RBD project. However, as of June 2025, the City will follow one CPP for *all* substantial amendments regardless of whether the change involves an RBD project. This updated CPP is more comprehensive than the individual CPPs (e.g., for HPRP, the City will now translate documents into 10 languages instead of just Spanish and will publish public notices in 10 newspapers instead of three) and is thus compliant with HUD's citizen participation requirements.