

February 6, 2025

New York City Conflicts of Interest Board
2 Lafayette Street
New York, NY 10007

Re: Formal request for waivers of the post-employment restrictions for Sara Cobb, former FEMA Recovery Coordinator, Department of Cultural Affairs

Dear New York City Conflicts of Interest Board Members:

I am writing to request waivers of both the one-year post employment appearance ban and the lifetime particular matter ban to permit Sara Cobb, former FEMA Recovery Coordinator of the Department of Cultural Affairs ("Agency" or "DCLA"), to return as a consultant for DCLA after leaving City service. Ms. Cobb served as a FEMA Recovery Coordinator for ten years, ending her tenure on January 31, 2025. DCLA would like to retain her for a short-term, project-specific consultancy as soon as possible. Permitting Ms. Cobb to provide services for DCLA would be beneficial to the Agency and the City.

The DCLA FEMA Recovery Coordinator serves as the lead project manager for the agency's complex Federal Emergency Management Agency ("FEMA") projects resulting from Hurricane Sandy, among other federally declared natural disasters eligible for FEMA funding. Ms. Cobb is the only one with knowledge of FEMA Recovery Projects, and in particular, the Hurricane Sandy Recovery project at the NY Aquarium. Ms. Cobb's role and responsibilities to date in handling all aspects of these projects for DCLA give her a singular ability to serve as a steward/liaison for DCLA in the transition period after her departure from the agency and through the hire of a fulltime replacement for her role.

Ms. Cobb is willing to provide services as a consultant for DCLA pursuant to the terms of a Consultant Agreement, which would expire upon the completion of services up to a value of \$20,000 or as of February 2026, whichever is earlier. We approximate Ms. Cobb's consultancy will be performed over a period lasting between four months and one year. DCLA anticipates that she will be compensated at the rate of \$75.66 per hour and will provide services approximately 6-12 hours per week. As a consultant, Ms. Cobb will serve as the liaison for the Hurricane Sandy FEMA Recovery Project at the New York Aquarium, which she previously managed for DCLA. The Hurricane Sandy Recovery at the NY Aquarium, with a cost of roughly \$230 million, is one of the largest single Hurricane Sandy recovery projects for the City of New York. DCLA's

responsibilities include project management and oversight of the restoration, coordination across agencies, communications, drafting documents, cost and payment review, and audit prep. To move forward at this time, the project must reimburse the cost outlays by the not-for-profit that operates the Aquarium and manages the construction, and currently requires, among other things: a new Certificate to Proceed (under review at OMB); a second amendment to the related Subgrant Agreement (also pending OMB and Law Department sign-off); a new version and increased FEMA grant for the project; and review and management of change orders, approval letters and the change order procedure. If she is permitted to continue her work at DCLA, it will only benefit the Agency and the City.


In consulting the Conflicts of Interest Board language on this matter (City Charter § 2604(d)(6)), I approve Sara Cobb to work on this particular matter to continue work similar to the matters handled during her tenure. This contract will cover an approximately four-month to one year period, beginning as soon as possible. The contract will conform to the stipulations detailed in the City Charter.

Pursuant to Section 2604(e) of the City's Charter, a former public servant may be issued a waiver of post-employment restrictions where the holding of a position would not conflict with the purposes or interests of the City. Granting the requested waivers and allowing Ms. Cobb to return as a consultant aligns with the interests of the City, as DCLA would benefit from her specific experience and expertise. If the waivers are not granted, the City and the Agency would miss out on the opportunity to receive additional support due to Ms. Cobb's unique skills and qualifications. At this time, no other individual has this extensive experience.

DCLA respectfully requests waivers pursuant to Section 2604(e) of the City Charter to permit Ms. Cobb to return as a consultant for DCLA for four months to one year after leaving City service.

Should you have any further questions, please do not hesitate to contact me at (212) 298-8727. Thank you for your time and attention to this matter.

Sincerely,



Lance A. Polivy
General Counsel

Acknowledged and agreed to:



Alton Murray
Deputy Commissioner

cc: Ethan Carrier/COIB (via e-mail)