



**Testimony of Rachel Sulaymanov
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New York City Department of Emergency Management
September 28, 2022**

Good morning members of the Report and Advisory Board Review Commission. I am Rachel Sulaymanov, Executive Director of Government Relations at New York City Emergency Management and I am here today to request waivers for three local laws.

Local Law 24 of 2011 which amends section 30-102 of the Administrative Code

Background: This legislation was passed and enacted after a snowstorm in 2010. Since the requirement went into effect, Emergency Management has dutifully complied with Local Law 24 by developing a report detailing each time a corresponding weather emergency plan is activated and publishing it on our website.

Benefits do not outweigh expenditure to produce: The development of the report takes approximately 100 hours from four divisions within the agency. We track the number of times the report is opened on our website; it also receives less than ten external opens per year. We also submit to Council directly but have received no inquiry on the content or its findings in the 12 years this law has existed.

Irrelevant: In compliance with the legislation, this report is published in November of the following year. Those reading the report are seeing snapshots from the past, not a real-time explanation of City actions, but rather a collection of actions taken in the totality of events long past.

Additionally, over the 12 years we have been in compliance with this legislation, the triggers for activating plans have changed, and notification of major expected impacts is released to the public via press releases, Notify NYC, local media, and through Emergency Management's External Affairs and Interagency Coordination divisions pushing information to their respective constituencies. Depending on the severity of the emergency we also hold conference calls for elected officials and their staff with multiple city agencies and partners; this provides them the real-time context they need, as does access to our government relations team via our 24/7 monitored email address.

Emergency Management respectfully requests this report be waived.

Local Law 26 of 2011 which amends Section 30-103 of the Administrative Code

Background: This legislation was passed and enacted after the same snowstorm in 2010 that caused considerable issues across the city. Since then, Emergency Management has complied by compiling and publishing a report of city and state agency actions for any snowfall totaling six (6) inches or more.

Benefits do not outweigh expenditure to produce: This local law requires 13 city and state agencies to report to NYCEM on their actions annually. The coordination of agency/partner inputs and development of this report takes approximately 150 hours of city government work. The final product is compiled by our Government Relations team of three, to which hours take away from more focused work we could be doing. Additionally, a portion of this local law requires Emergency Management to provide information from state agencies who are not under the oversight of the City Council, such as the MTA, Port Authority, and New York State Homeland Security and Emergency Services and as such, they are not obligated to reply to our requests for information and they do not participate.

Additionally, we track the number of times the report is opened on our website, it receives fewer than ten external opens per year. We also submit to Council directly but have received no inquiry on the content or its findings in the 12 years this law has existed

Irrelevant: In compliance with the legislation, this report is published in November of the following year of snow emergencies. Those reading the report are seeing snapshots in the past, and not seeing a real-time explanation of City actions, but a collection of actions taken in the totality of an event long past. It does not help them make sense of City actions during the snow event.

Finally, emergency management is not static and over time our plans change; this report requests very specific details that are no longer encompassing of the way we plan for winter weather emergencies, our current triggers, our current operational strategies, and the way agencies and partners prepare for, respond to, and recover from snowstorms.

NYCEM respectfully requests this report be waived.

Local law 64 of 2013 amends 30-112 of the Administrative Code and encompasses sections 30-104 through 30-111

Background: This piece of local law connects reporting requirements to sections 30-104 through 30-111 of this chapter and requires reporting to the Council on changes the agency makes to these plans. Some of the plans include but are not limited to fuel management during emergencies, community recovery, emergency sheltering, and special medical needs sheltering. These laws were passed as oversight in response to Hurricane Sandy.

Irrelevant: Since 2012, Emergency Management’s plans – which are never static and instead continually evolve – have been updated significantly to streamline efficiency, operational capacity, and response. One of the main points of emergency planning is to make plans “scalable” based on the emergency. Each time there is a major emergency, Emergency Management conducts an after-action review where we review the effectiveness of our plans and implement changes based upon our findings. As our plans have changed, individual council members have engaged Emergency Management on particulars, and we are happy to converse with them to provide details and context. This legislation has been made organically moot in the face of changing plan management structure and greater transparency with our coordination and partnership with them over the years. However, despite our changing plans over the years, we have maintained compliance with



this legislation by submitting to Council as mandated. We have never received any feedback to our submissions.

Duplicative: It is our view that Local Law 12 of 2022 supersedes and makes redundant this local law, as it requires interagency review of plans and public reporting on such plans. This law will come into effect in 2023 and its compliance will be of such undertaking that we are requesting four new positions – two at the planning level and two at the government relations level.

NYCEM requests this legislation requiring the reporting on such plans be waived.