



Comprehensive Planning for a More Just, Equitable NYC

Testimony before the 2019 Charter Revision Commission

By Elena Conte, Director of Policy

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Good evening, and thank you for the opportunity to testify. My name is Elena Conte, and I am the Director of Policy at the Pratt Center for Community Development, which has been working closely as part of the Thriving Communities Coalition.

First, I want to thank the Commissioners and the staff for the inclusion of the topic of comprehensive planning in the Preliminary Staff report. This is a recognition that there has been major public outcry that the current planning system is failing to support the New Yorkers of today, and is not set up to meet our ever-growing future needs. The status quo cannot stand.

I have had the privilege of testifying in multiple arenas on this topic and I look forward to participating in upcoming working meetings to address the details of operationalizing the recommendations. For tonight, the most important point I want to raise is that as a city we can and must build on your preliminary recommendations and go deeper to make meaningful changes. We are prepared to do so with you.

To your question of whether those united in calling for comprehensive planning are clear in their vision of it, below, we've submitted an eight-point summary that aims to clarify the major components for you.

I will focus on points three through six right now:

3) Citywide and localized analysis –

This cohesive data analysis is well within the existing capacity of the Department of City Planning, and many aspects of it are currently being performed in ad hoc and distributed ways. Streamlining it, and adding a few key citywide measures will strengthen existing systems as well as make it easier for communities to get the information they want to know at intervals when they need it for local planning.

4) Process for balancing local and citywide needs through community planning

This local engagement and investment in planning will build buy-in to the entire process and allow for communities to choose the ways they want to move forward, squarely in the context of being part of a larger whole. This is accomplished by having the public contribute in the process of

creating the goals of the whole (instead of being told about what they are from “on-high”) and supporting communities to define their visions effectively.

5) Equitable distribution of resources

To achieve this, all the goals and targets of the components of a comprehensive plan need to be in one place and to speak to each other, as well as be measured and reported on.

6) Coordinating with capital budget

Divorcing or distancing budgeting from planning deprives the process of purpose and impact. There are historical precedents in New York and models that can guide us in the effort to reunite planning and budgeting. This is requisite for overcoming historic disparities.

In sum, a comprehensive planning cycle must result in a single, easily identifiable framework to repair our broken, piecemeal system. Integrating and aligning planning, policy-making, and the budget in an intentional way is needed to achieve our equity goals. We can and must step into our knowledge and vision to accomplish this. We look forward to working closely with you to craft a proposal for the ballot.

On Tuesday, April 23, the 2019 Charter Commission released a preliminary staff report that included consideration of a planning cycle, that would create synergy and coordination between existing planning documents, ensure that plans address anticipated future challenges with specific indicators for measuring progress over time, with short-, immediate- and long-term planning issues in mind, and a process for communities and stakeholders to meaningfully weigh-in on planning decisions. The staff report makes a start, but fails to accomplish the overarching goal of a comprehensive citywide planning process that would address the lack of transparency, coordination, and equity in the current process.

Whether it is called a “planning cycle,” a “comprehensive planning process” or a “master plan”, below are the eight key elements that are indispensable to citywide planning that meets the demands of today. Working together with community groups, planning organizations, and elected officials, we have agreed on these 8 features that we think are essential to any comprehensive planning cycle. Without these features, a comprehensive citywide planning cycle will not have enough power or coherence to enact real change and remedy the frustrations New Yorkers have with the current system, which has produced decades of inequity, unfairness, and inefficiency.

A meaningful comprehensive planning cycle must include the elements below, which must be expressly required in the charter:

1. **A single clear, coherent plan:** Aligning what’s already required in the charter is a start, but it’s not enough. The charter must require the creation of a citywide comprehensive plan, which can guide future land use, budgeting and policy decisions.
2. **Equity principles:** The process and the plan itself must be rooted in shared principles of equity; inclusiveness; sustainability and resilience; transparency; and accountability. The principles should

inform articulated city-wide goals, linked to clear indicators to measure progress and success over time. Meeting the greatest needs, reducing neighborhood-based, racial, and socio-economic inequality, fostering integration without displacement, and increasing access to opportunity should be clearly stated as goals of comprehensive planning.

3. **Citywide & localized analysis:** The City must perform data-driven, top-down analyses of citywide infrastructure and service needs, as well as displacement risk. These analyses must result in a plan that transparently balances neighborhood and city-wide needs.
4. **Balance citywide and local needs through bottom-up community planning:** The process must entail a robust community-based planning process that gives under-resourced communities and underrepresented stakeholders a meaningful voice in the planning process and subsequent land use and development decisions. The plan should transparently balance community priorities with citywide needs in alignment with its principles and goals.
5. **Equitable Distribution of Resources and Future Development:** The plan should set concrete, measurable, and equitable neighborhood targets for growth, including affordable housing, essential City services and facilities, and critical investments, so that all neighborhoods do - and receive - their part.
6. **Coordinate with Capital Budget:** The community investments identified in the plan should be included in the 10-year capital strategy to ensure the City allocates needed resources and capital investment to communities through each annual expense and capital budget process, consistent with the plan.
7. **Create a future land use map:** The City should create a future land use map to guide growth and development that will engender the citywide and local goals of the comprehensive plan.
8. **Incentivize alignment with the plan:** The City should enact mechanisms to incentivize plan-aligned growth and discourage land use actions that do not comply with the plan. This includes allowing plan-aligned developments to bypass ULURP, and those that do not align to be subject to ULURP. Private and public applications that align with the plan and land use map should be required to complete an abbreviated, supplementary EAS or technical memo, saving applicants significant time and resources. All land use applications should require a rationale for pursuing the project. If non-aligned applications seek approval through ULURP, the Commission and local Council Member should be required to publish their rationale for wanting to modify the comprehensive plan.

Any comprehensive planning cycle needs a real regulatory framework that can give teeth to the needs and opportunities the plan identifies. These 8 elements aim to create that very framework. We appreciate this opportunity to testify, and look forward to discussing further technical details of the comprehensive planning framework with the Charter Commission.

For more information, contact

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NOTE: This testimony was prepared by the Pratt Center for Community Development. It does not necessarily reflect the official position of Pratt Institute.