

TOWARDS **COMPREHENSIVE** **PLANNING**

Moving Beyond Our Comfort Zone



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EXECUTIVE SUMMARY

New York City is at a turning point. The outgoing de Blasio administration's piecemeal approach to neighborhood rezonings left communities, builders, planners, and government agencies frustrated with the current land use process. Moreover, the recent devastation due to Hurricane Ida is a stark reminder not only of the compounding challenges of climate change, the affordable housing crisis, and economic inequities, but what happens when our City does not take a coordinated and proactive approach to long-term planning. As we recover from the COVID-19 pandemic and elect new local leadership this year, we are confronted with how a city of 8.5 million people with varying needs, cultures, and vulnerabilities should plan for its long-term future.

Towards Comprehensive Planning was originally sparked by the debate surrounding the 2018–2019 City Charter Commissions' consideration of an amendment calling for a new citywide comprehensive planning cycle and the subsequent legislative proposal, *Planning Together*, from City Council Speaker Corey Johnson. Despite the strengths and shortcomings of Speaker Johnson's proposal, the debates and conversations concerning comprehensive planning in New York City must continue into the next administration to make additional reforms, strengthen interagency coordination, integrate spatial planning and capital budgeting, ensure plan implementation, and secure additional funding for community-based planning.

New York City must move beyond its comfort zone—a broken land use process that we have tolerated for too long, despite frustration on the part of the public, the development community, and the City. This policy brief will offer a set of recommendations the City must take to move New York City towards a comprehensive planning framework that addresses past inequities, integrates siloed systems, conducts thoughtful and ongoing community engagement, and tackles immediate and long-term challenges, including aging infrastructure, environmental injustices, and the housing affordability crisis.

Meaningful reform must strive towards an ideal version of comprehensive planning that gives neighborhoods a seat at the table. Reform can come in the form of legislation, referendum, administrative changes, interagency alignment, budget prioritization, and proactive planning. We cannot let the size or complexity of our city stifle our willingness to break free of a land use system that no longer serves us.

How and when our city plans, who should be involved, and—most importantly—who should decide are vital questions we must address with a new mayoral administration, Comptroller, and City Council.

The time to act is now.

INTRODUCTION

Throughout 2021, debates surrounding [City Council Speaker Corey Johnson's *Planning Together* proposal](#), a bill for a 10-year comprehensive planning process in New York City, have reinvigorated the age-old question of whether New York City should have a comprehensive plan. Currently, New York City does not have a comprehensive plan—a single document that facilitates future decision-making by specifying a municipality's long-term development goals concerning land use, infrastructure, housing, open space, transit, and other types of services, in addition to addressing concerns such as historic preservation, equity, resiliency, and sustainability. While some groups argued [in favor of the proposal](#), others asserted it is [too top-down](#) by not providing community groups a substantial voice in the land use process. Others argued that New York City is too unwieldy to undergo this resource-intensive, years-

long process. On top of this, some critics of the proposal, including [New York City's Department of City Planning](#), continue to contend that the City's Zoning Resolution and other topic-specific strategic plans satisfy the New York State mandate for a comprehensive plan.

The Municipal Art Society of New York (MAS) believes Speaker Johnson's legislative proposal ultimately fell short since it did not address the current structural imbalance in the City's planning process through City Charter reform. By the end of 2021, the City Council declined to bring the proposal to a vote. However, MAS continues to advocate for comprehensive, community-based planning. From the development of the City's first Zoning Resolution in 1916, the advocacy surrounding 197-a community planning in the 1990s,¹ to the calls for comprehensive planning and land use

Towards Comprehensive Planning Program

Series: MAS believes that New York City should learn from other cities' comprehensive planning frameworks and community engagement efforts. To help ground different approaches to comprehensive planning, MAS hosted [a panel discussion on May 21, 2021](#), to define and contextualize comprehensive planning in other cities—both nationally and internationally. The panelists included Lisa Fairmaner (Head of the London Plan and Growth Strategies, Greater London Authority), Susan Haid (Deputy Director of Planning, Long Range and Strategic Planning, City of Vancouver), and planner and landscape architect David Rouse (authoring a forthcoming book *The Comprehensive Plan: Sustainable, Resilient, and Equitable Communities for the 21st Century*).

Using that conversation as a jumping off point, MAS hosted a second [panel discussion](#)

[on comprehensive planning in New York City](#) on July 21, 2021. The panelists included Tom Angotti (Professor Emeritus, Urban Policy & Planning, Hunter College and the Graduate Center, CUNY), Barika X. Williams (Executive Director, Association for Neighborhood & Housing Development, Inc. (ANHD)), and Jon McMillan (Director of Planning TF Cornerstone). Spencer Williams, Director of Advocacy at MAS, moderated both panels.

On December 7, 2021, MAS hosted a third [panel discussion on the intersection of comprehensive planning and historic preservation](#). The panelists included Ken Bernstein (Principal City Planner, City of Los Angeles Office of Historic Resources), Christopher Cirillo (Executive Director/President, Ascendant Neighborhood Development Corporation), and Dominique Hawkins (Managing Principal/Partner, Preservation Design Partnership, LLC). Elizabeth Goldstein, President of MAS, moderated the panel.

reform during the 2018–2019 City Charter Revisions as a member of the Thriving Communities Coalition, MAS believes that a comprehensive planning framework should advance access to opportunity, equitably distribute growth, preserve our history, and prepare for a dynamic future that adapts to a changing climate.

POLICY BRIEF GOALS

If New York City is to confront and rectify past inequities while combating the challenges we face today, we must overcome the age-old argument that New York City is too large to undergo a community-based, comprehensive planning process. To achieve a more holistic and coordinated approach to planning in New York City, this policy brief frames the debate by defining comprehensive planning, articulating why New York City needs to embrace comprehensive planning at this pivotal moment, providing an overview of lessons learned from other cities, and presenting recommendations the City must take to move New York City towards a comprehensive planning framework.

The recommendations listed below are most effective when adopted as part of a comprehensive planning framework implemented through City Charter reform. However, they can be advanced independently through a variety of legal methods including agency decision-making, administrative changes, and City Council legislation. The City must:

1. Establish a Shared, Citywide Vision

- Facilitate reconciliation conversations at the Community Board level concerning

- the City's history of residential racial segregation and environmental injustices.
- Conduct an Existing Conditions and Long-Term Needs Assessment at the City and Community District level.

2. Give Neighborhoods a Seat at the Table

Strengthen Community Capacity

- Prioritize intentional and consistent public engagement in a variety of formats, before, during, and after any comprehensive plan is adopted.
- Increase funding for all Community Boards and Borough President offices to hire more staff members, perform member training, provide translation services and childcare, and perform public outreach.
- Improve community-based planning by strengthening the 197-a planning process and its connection to a shared citywide vision establishing goals, targets, and benchmarks.

Prioritize Equitable Distribution of Development

- Balance community needs and citywide targets based on ongoing community engagement as part of a comprehensive planning framework.
- Promote equitable and inclusive neighborhoods as part of a comprehensive planning framework to improve livability, health, education, and social infrastructure.
- Explore growth management tools as a component of a comprehensive planning framework to encourage equitable development as well as dampen real estate speculation, limit displacement, generate funding, and promote balanced planning.

Promote Climate and Environmental Justice

- Ensure equitable, sustainable, and resilient initiatives and development are part of all future comprehensive planning efforts, as well as land use and zoning, infrastructure, capital planning, and budgetary decisions.
- Prioritize Environmental Justice as the City plans for the future.

Preserve Character and Culture

- Promote the Landmarks Preservation Commission's (LPC) Equity Framework as part of a comprehensive planning framework.
- Prioritize equitable economic development as part of a comprehensive planning framework by promoting small business recovery.

3. Transform Planning into Action

Ensure Transparent and Accountable Implementation

- Establish citywide short-, medium-, and long-term implementation goals and strategies as part of a comprehensive planning framework.
- Ensure future land use and zoning applications are consistent with adopted community plans and a citywide comprehensive plan.
- Improve agency coordination and capacity to effectively work with stakeholders to carry out a comprehensive plan's goals, policies, targets, and benchmarks.
- Require regular audits, reporting, reviews, and amendments throughout a comprehensive planning cycle.
- Increase data access, transparency, and maintenance to improve accountability and facilitate use of open data by all citizens in the planning process.

Connect Capital Planning and Budget Equity

- Connect capital planning and budget equity within a comprehensive planning framework.
- Coordinate capital project planning with Fair Share Criteria and a comprehensive planning framework.

Improve Environmental Review

- Coordinate the City Environmental Quality Review (CEQR) process with a comprehensive planning framework, community planning initiatives, and fair housing goals.
- Convene a Working Group to study and provide recommendations for the use of Generic Environmental Impact Statement (GEISs).

Potential Legal Routes

- City Charter Reform
- Regional and State Level Reform

Any shift in our collective planning approach will bring up new and old anxieties by asking New Yorkers to decide if our fears of change are pervasive enough to keep us within the status quo. However, the promise of an equitable future can pierce these boundaries and instead help us create a more dynamic and collaborative approach to meeting old and new problems. Comprehensive planning presents a debate, not just between different stakeholders across New York City's neighborhoods, but a debate between our past, present, and future.

WHAT IS COMPREHENSIVE PLANNING?

BACKGROUND AND HISTORIC OVERVIEW

States throughout the country started to pass enabling legislation in the 1920s allowing for comprehensive plans and zoning ordinances for cities and towns. While the meaning of comprehensive planning has been subject to different interpretations throughout the past decades, in its most optimal form, a comprehensive plan (or a master plan) offers a vision for development in a region, city, or town, setting out goals and policies concerning land use and zoning, infrastructure, transit, housing, and capital improvements. A comprehensive plan facilitates future decision-making, rather than making specific development decisions at the outset of the planning process.

“A comprehensive plan should be a statement of community values and aspirations, a reference point for decision-making, as well as set the agenda for action.”

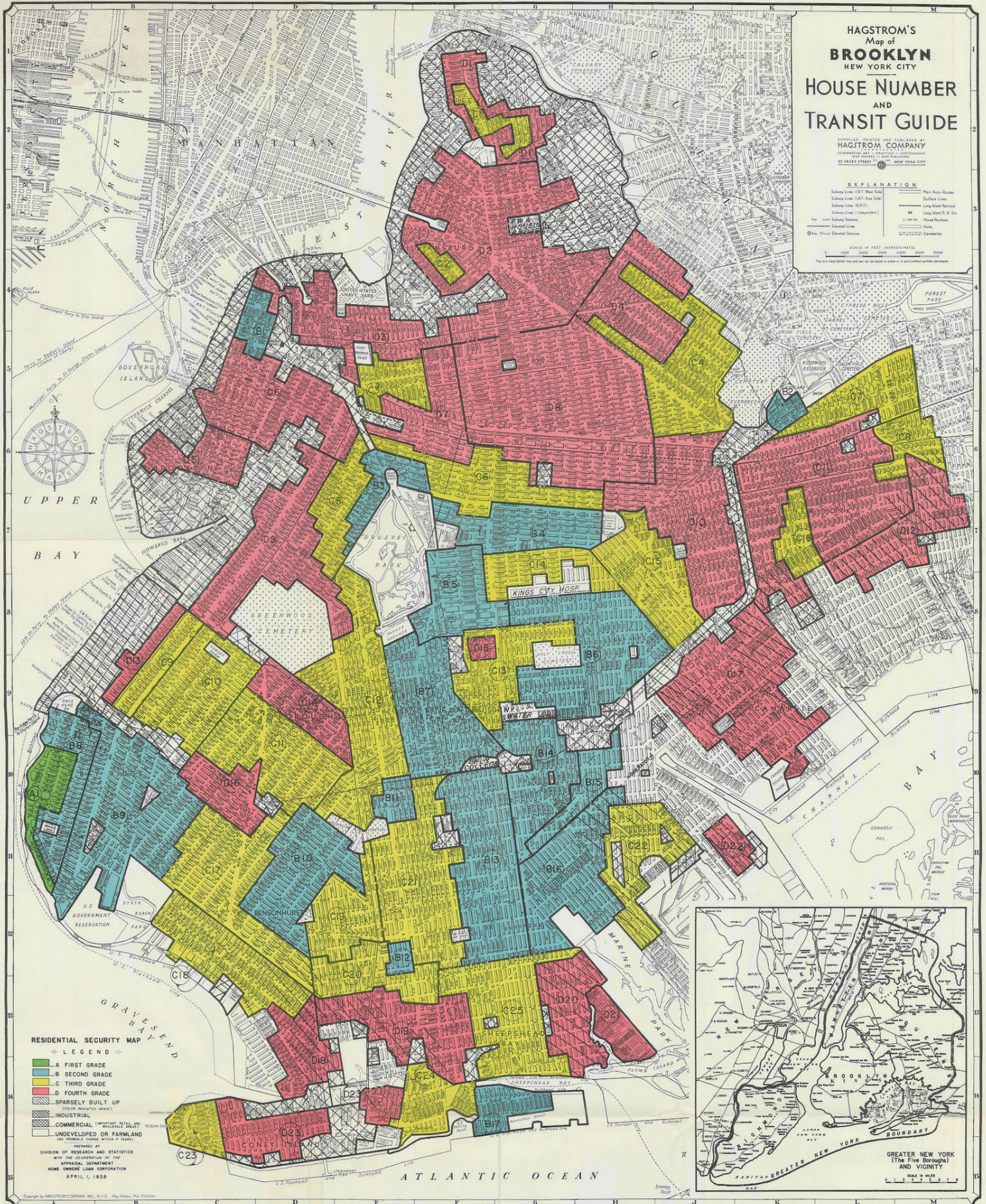
—David Rouse

Despite the U.S. Supreme Court ruling against explicit race-based zoning laws in the 1917 *Buchanan v. Warley* decision, comprehensive plans and zoning ordinances, coupled with mechanisms such as redlining, racially restrictive covenants, and mid-century urban renewal programs, reinforced institutional racism throughout the twentieth century.² Consequently, indirect methods such as exclusionary zoning policies that impose minimum lot size

requirements, limits on multi-family homes, and minimum square footage requirements, continue to influence spatial and economic segregation in American cities.³

Recently, however, conversations have been taking place at all levels of government concerning present-day residential segregation and how urban planning can be a force of positive change. For instance, as part of the American Jobs Plan, the Biden Administration has proposed a competitive grant program that incentivizes reform of local exclusionary zoning practices. *Desegregate Connecticut* is a coalition devoted to addressing residential segregation in the state by reforming its land use and zoning laws.

On a local level, comprehensive plans have been utilized to promote equity and reconciliation in cities such as Minneapolis and Austin. In 2018, Minneapolis set out to combat racial disparities due to historic redlining by being the first major city in the nation to eliminate single-family zoning through the *Minneapolis 2040* comprehensive plan. *Imagine Austin* set out a goal of tackling the city’s history of racism and segregation. The plan recognized the role of Austin’s 1928 comprehensive plan and mid-century highway projects in dividing the city’s east and west and black and white areas. Other large cities have recently adopted comprehensive plans, such as Washington D.C., or are in the process of undergoing a comprehensive plan overhaul, such as Chicago. While the planning process can be improved, comprehensive plans should be used as forward-looking documents to advance spatial equity and inclusive growth.



Home Owner's Loan Corporation map of Brooklyn, 1938 (Source: National Archives and Records Administration, Mapping Inequality Project)

HOW IS COMPREHENSIVE PLANNING DIFFERENT FROM ZONING?

Zoning is often conflated with a comprehensive plan. While a comprehensive plan provides a broad, citywide framework for future development decision-making, zoning is one of many tools that are used to implement a comprehensive plan. Zoning law regulates the uses, location, and form a building takes in a city or town. Traditionally, cities and towns utilized several types of zoning districts, such as residential, commercial, or industrial zones, to shape development. In addition to restricting types of uses, zoning law also imposes limits on a building's bulk. Bulk regulations specify a building's size and placement on a zoning lot. In New York City, zoning regulations are contained in the Zoning Resolution.

WHAT IS COMMUNITY-BASED PLANNING?

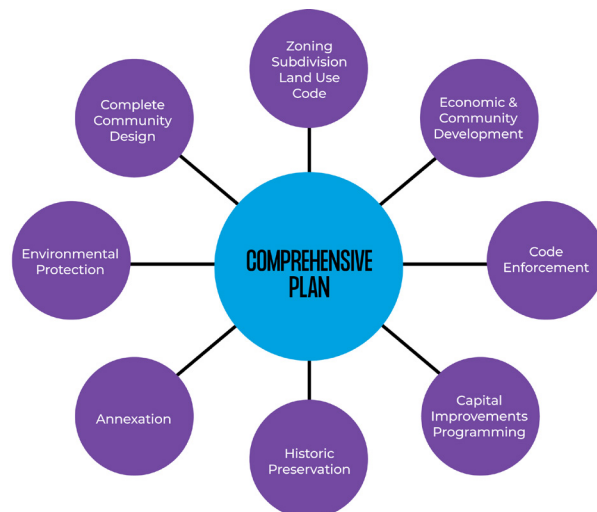
It is important to distinguish between community-based planning approaches and citywide comprehensive planning. Community-based planning can and should work in conjunction with comprehensive planning. The latter typically embodies a broad-based planning process that articulates a shared vision for the entire city, while community-based planning places community members at the center of the process by actively engaging with the people who live and work in a community when formulating area-specific plans. Using their everyday experience, an effective community-based planning

process empowers residents to collaborate with planners to identify opportunities for future growth and investment. Ideally, a community-based planning process should be incorporated into a citywide comprehensive planning framework, balancing neighborhood-level needs with equitable citywide goals and targets.

“Planning as a process is extremely important and has to be done at multiple scales: at the neighborhood, community, city, and regional-level.”

—Tom Angotti

WHAT ARE THE OPPORTUNITIES AND CHALLENGES OF COMPREHENSIVE PLANNING?



Topics addressed in a comprehensive plan.

IMPLEMENTATION, REVIEW, AND ACCOUNTABILITY

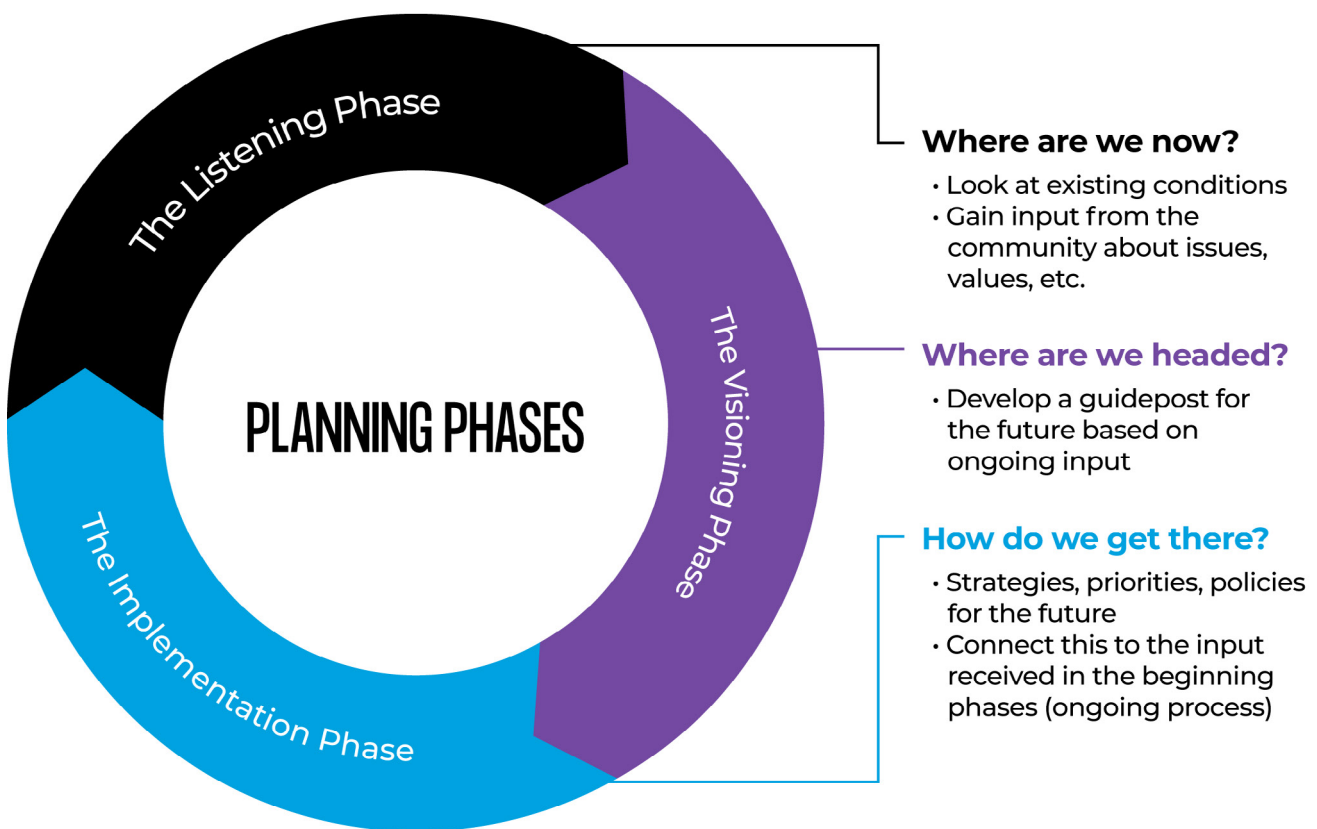
Once a final comprehensive plan is adopted, a significant and challenging phase begins: implementation. There are different routes for implementing an effective comprehensive plan. While zoning ordinances and land use regulations are the more well-known tools for implementation, capital improvements and infrastructure investments are another key component for carrying out the goals of a comprehensive plan. Collaboration and partnerships between government agencies, non-profit groups, and the private sector is essential. Lastly, consistency between zoning and land use applications and a city's comprehensive plan is key. "Consistency criteria,"⁴ which specifies standards or policies for evaluating whether a land use application is compatible with a comprehensive plan, is typically

included in the state or local comprehensive planning law or part of the comprehensive plan itself. For example, *Memphis 3.0*, the city's comprehensive plan, sets out criteria for evaluating whether a land use application is consistent with the comprehensive plan.

Annual or bi-annual reviews of comprehensive plans should be conducted to ensure accountability and transparency during the implementation stage. Cities frequently establish short-term goals that reflect the principles outlined in the plan. For example, *Salt Lake City's best practices guide for community engagement during COVID-19* is an example of a city adapting to unforeseen circumstances. *Minneapolis 2040* included an implementation timeline, outlining short-, medium-, and long-term strategies according to the policy topic, such as transportation, housing, and parks and open space.

Opportunities	Challenges
<ul style="list-style-type: none"> → More holistic, long-term visioning, goal setting, and coordination at multiple scales (neighborhood, city, region, etc.) → Earlier, continuous, and more meaningful public engagement so that communities are not left in a reactionary stance → Balance between citywide and neighborhood priorities → Alignment of capital projects, budget, and community needs → Potential to facilitate regional planning and coordination → Recently, comprehensive plans are becoming more relevant to present-day issues by incorporating topics that were not included traditionally, such as equity, mandatory inclusionary housing, and climate change 	<ul style="list-style-type: none"> → Implementation challenges associated with changes in mayoral administration and lack of resources → Communities experiencing "planning fatigue" since comprehensive plans have a reputation for having a long engagement and drafting process → Relevancy challenges since comprehensive plans necessitates ongoing planning and growth management to be responsive to changing urban conditions, markets, and natural disasters → Financial costs, including technical resources for engagement and environmental review → Alignment and consistency of land use applications with the plan → Coordination of city, state, and federal plans, policies, resources

Political commitment and willpower are most consequential when it comes to implementing a comprehensive plan. To minimize an inherently political process and promote accountability, a representative advisory group or committee should be established not only to oversee the comprehensive planning and engagement process, but to provide continuity throughout the implementation stages, since the comprehensive plan often spans mayoral administrations and various stakeholders come and go throughout the process.



Comprehensive planning phases according to David Rouse (Source: Towards Comprehensive Planning: Global Cities in Conversation, MAS Program)

THE STATE OF PLANNING IN NEW YORK CITY

PLANNING MILESTONES IN NEW YORK CITY

1910s-1920s: Early Zoning Reform

- **1916:** New York City implemented the first comprehensive municipal Zoning Resolution (ZR) in the country, which sets forth what can be built on properties throughout the City, including use and bulk. However, no city agency was created to execute the new zoning law.

1930-40s: Beginnings of Segregation and Suburban Development

- **1936:** The City Charter Revision Commission established a permanent City Planning Commission (CPC), originally with 7 members, and a Department of City Planning (DCP). The Charter required DCP to develop a long-term Capital Budget and a master plan.
- **1938:** Rexford Tugwell, newly appointed Chair of the CPC, released a Master Plan for New York City.
- **1942:** Robert Moses appointed to the CPC. Moses did not fulfill the City's master plan requirement by denouncing Tugwell's Master Plan.
- **1949:** The passage of the federal Housing Act of 1949 began the era of urban renewal and slum clearance.

1950s-60s: The Modern City and Moses Era

- **1950:** The City released a *Plan for Rezoning the City of New York* by Harrison, Ballard and Allen, which largely formed the basis of the 1961 ZR.

- **1958:** The City released *Zoning New York City* by Voorhees Walker Smith & Smith. This report worked off the recommendations contained in the 1950 *Plan for Rezoning the City of New York* and laid the foundation for the 1961 ZR.
- **1961:** The City enacted an updated version of the 1916 Zoning Resolution. New aspects of the ZR included the concept of incentive zoning, parking requirements, and encouraged "tower-in-the-park" designs. The 1961 ZR is the foundation of the ZR we have today.
- **1961:** Community Planning Boards are created (precursors to Community Boards (CBs)).
- **1965:** The Landmarks Preservation Commission (LPC) is established through the City Charter.
- **1969:** The Lindsay Administration released *Plan for New York*, intended as a master plan for the City. The Plan was criticized for its lack of public input and was never formally adopted by the Board of Estimate.

1970s: Administrative Changes

- **1973:** New York City instituted Executive Order No. 87, which laid the foundation for the City Environmental Quality Review process.
- **1975:** City Charter Revision:
 - The City Charter was revised to eliminate the CPC's master plan requirement. Instead, the updated Charter allowed for "plans for the development and improvement of the city" by the Mayor, CPC, CBs.
 - The Uniform Land Use Review Procedure (ULURP) was established to democratize land use decisions in reaction to the top-down planning methods of the Moses era.

- 59 Community Boards were established with advisory roles in the ULURP process.
- The 197-a planning process was established to provide communities an opportunity to adopt proactive community plans.
- The capital budget process was moved from DCP's purview to the Mayor's Office of Management and Budget.

→ **1975:** New York State passed the State Environmental Quality Review Act.

1980s-90s: City Charter Overhaul

- **1989:** The US Supreme Court ruled the City's Board of Estimate unconstitutional; in response, a City Charter Revision Commission was established.
 - The City Council replaced the Board of Estimate. It has the final vote on land use applications in the ULURP process, as well as the authority to modify and adopt the City's budget.
 - CPC expanded from 7 to 13 members.
 - The City established Fair Share Criteria, designed to equitably distribute the burdens and benefits of City facilities.
 - DCP required to produce a "Zoning and Planning Report" every 4 years.
- **1992:** The City released its first Comprehensive Waterfront Plan.
- **1993:** DCP released *Shaping the City* to satisfy the Charter's Zoning and Planning Report requirement.

2000s: The Bloomberg Era

- **2007:** *PlaNYC 2030: A Greener, Greater New York* released as a long-term sustainability plan.
- **2008:** The City Charter was amended with the passage of Local Law 17 of 2008 to establish a requirement for a citywide sustainability plan and the creation of an Office of Long-Term Planning and Sustainability.
- **2012:** DCP no longer required to produce a Zoning and Planning report.
- **2013:** The City released *PlaNYC: A Stronger, More Resilient New York* following Hurricane Sandy.
- **2013:** The Bloomberg Administration oversaw the passage of 120 rezonings.

2010s: The de Blasio Administration

- **2014:** The de Blasio administration released *Housing New York: A Five-Borough, Ten-Year Plan*, setting a goal to create and preserve 200,000 affordable housing units over ten years.
- **2015:** *OneNYC: The Plan for a Strong and Just City* released to satisfy Section 20 of the Charter.
- **2016:** The City Council passed Mandatory Inclusionary Housing.
- **2017:** The de Blasio administration released *Housing New York 2.0* with an updated goal of creating and preserving 300,000 affordable homes by 2026.
- **2018-2019:** Charter Revision Commissions were established in 2018 and 2019 by the Mayor and City Council legislation, respectively. All Charter amendments proposed by both Commissions were adopted by voters.

- **2020:** The City released *Where We Live* NYC Plan, the City’s five-year plan for fair housing.
- **2020:** City Council Speaker Corey Johnson released *Planning Together*, a proposal for a ten-year comprehensive planning process in New York City.
- **2021:** City Council passed Intro. 1572-B, also known as the Racial Impact Study bill, requiring the creation of a citywide equitable development data tool, a citywide displacement risk index, and racial equity reports for certain proposed land use actions.⁵

NEW YORK CITY'S CURRENT PLANNING FRAMEWORK

Legal Framework

In New York State, zoning is required to be undertaken “in accord with a well considered plan” or “in accordance with a comprehensive plan.”⁶ Municipalities can satisfy the comprehensive plan requirement either through the formalized process prescribed in the State enabling legislation or by referring to previous court decisions.⁷ New York State courts have interpreted this requirement to mean that a municipality must intentionally consider the needs of a community.⁸

To satisfy the State’s requirement that cities have a comprehensive plan, New York City officials have historically argued that the Zoning Resolution satisfies the State requirement of a “well considered plan.” However, as MAS argues below, the City does not in fact have a long-range comprehensive plan. While the City Charter

requires a long-term sustainability plan in Section 20, the City Charter does not require a citywide comprehensive plan that integrates land use, zoning, community input, preservation, transit, infrastructure, and the capital budget.

“We are charged by state law that we must have a well-considered land use plan and what we have maintained historically is that the city zoning framework at any given time is the city’s well considered plan.”

— Anita Laremont

Chair of the City Planning Commission
and Director of the Department of City
Planning

Land Use and Community Planning Framework

New York City’s Zoning Resolution establishes what can be built without discretionary actions by the City Planning Commission (CPC) or the Board of Standards and Appeals. This is known as “as-of-right development.” However, the City Charter requires certain land use actions to undergo the Uniform Land Use Review Procedure (ULURP), a public review process with mandated time frames for public hearings. While ULURP is the only legally mandated public review process for certain land use applications, it is not a process that facilitates holistic planning at the city or community level.⁹

The City's only formalized community-based planning framework is outlined in Section 197-a of the City Charter. This process provides an opportunity for community boards and local organizations to develop "197-a plans," which must be approved, sponsored, and submitted by a community board, borough board, or borough president.¹⁰ Although many 197-a plans were adopted in the 2000s, overall, this community planning process has not been successful due to a lack of funding, technical assistance, and, most importantly, engagement from the Department of City Planning (DCP).¹¹

Environmental Review Framework

In the land use context, the City Environmental Quality Review (CEQR) process requires DCP to evaluate and disclose potential adverse environmental effects of discretionary land use actions under consideration by the CPC or other authorized City agencies. CEQR is designed to allow decision makers to systematically balance social, economic, and environmental factors early in the planning process and require project modification as needed to avoid adverse impacts.¹² Despite this, comment opportunities provided during the scoping phase and on the

draft analysis routinely fail to incorporate or adequately respond to community-identified alternatives, questions, and methods suggested.

WHERE ARE WE TODAY?

The urgency for a citywide comprehensive planning framework has intensified as New York City looks back at the de Blasio administration's approach to land use and zoning. As of December 2021, the administration has rezoned eight neighborhoods¹³ after originally promising to rezone fifteen with the goal of creating or preserving 200,000 affordable housing units (the number increased to 300,000 units in 2017). The administration utilized the Mandatory Inclusionary Housing (MIH) Program, which supports the development of new income-restricted units by requiring a percentage of new residential units to be affordable in any upzoning application, to accomplish this goal.

MAS Community Planning Efforts: MAS has long advocated for community-based, comprehensive planning which balances top-down and bottom-up planning efforts. In 1998, MAS published *The State of 197-a Planning in New York City*, which evaluated and offered recommendations on improving the City's 197-a planning process. In 2010, MAS published *Planning for All New Yorkers: A 21st Century Upgrade for New York's Planning Process*, which called for a citywide planning

framework and increased funding and resources to all Community Boards based on the recommendations of the Community-Based Planning Task Force, a coalition coordinated and administered by MAS's Planning Center. Lastly, MAS's Livable Neighborhoods Program helps local leaders in under-resourced communities develop the knowledge and tools that they need to participate effectively in public land use review processes and engage in creative, community-based design and planning.

“I think one of the problems is that there is a disconnect between upzonings and the provisions of open space and schools, which is something, hopefully, that a comprehensive plan will help to solve.”

—Jon McMillan

Despite the administration’s ambitious goals, the City’s current planning process has been criticized for its siloed approach to rezonings, which are mostly concentrated in low-income communities of color, leading to the current distrust between communities and city agencies. Although the administration rezoned two high-opportunity neighborhoods before the end of 2021, over the past eight years, community concerns ranged from the fact that community members do not have power to shape their neighborhoods (as in the Bushwick Community Plan process), the piecemeal approach to various neighborhood rezonings (such as the multiple area plans for Long Island City), questions concerning the validity of CEQR analyses (such as for the Inwood rezoning), and the multiple lawsuits surrounding land use applications (such as the Two Bridges lawsuits).

While there has been some encouragement surrounding the release of the Where We Live NYC Plan and its goals concerning fair housing, as well as the recent passages of the Racial Impact Study legislation and the 10-year citywide climate adaptation plan legislation, much work remains to move New York City towards a citywide comprehensive planning framework. As the City faces the consequences of climate change and sea level rise, the impacts of the COVID-19 pandemic and an economic recovery, an affordable housing and eviction crisis, racial and social injustices, the time is ripe for a fundamental shift in the way we plan for the future.

Racial Impact Study Legislation and Equitable Development Tool: The recently passed Racial Impact Study legislation requires the creation of a citywide equitable development data tool, a citywide displacement risk index, and racial equity reports for certain proposed land use

actions. Increasing disclosure on race and social vulnerability in combination with land use applications would move the land use review process towards more equitable outcomes.

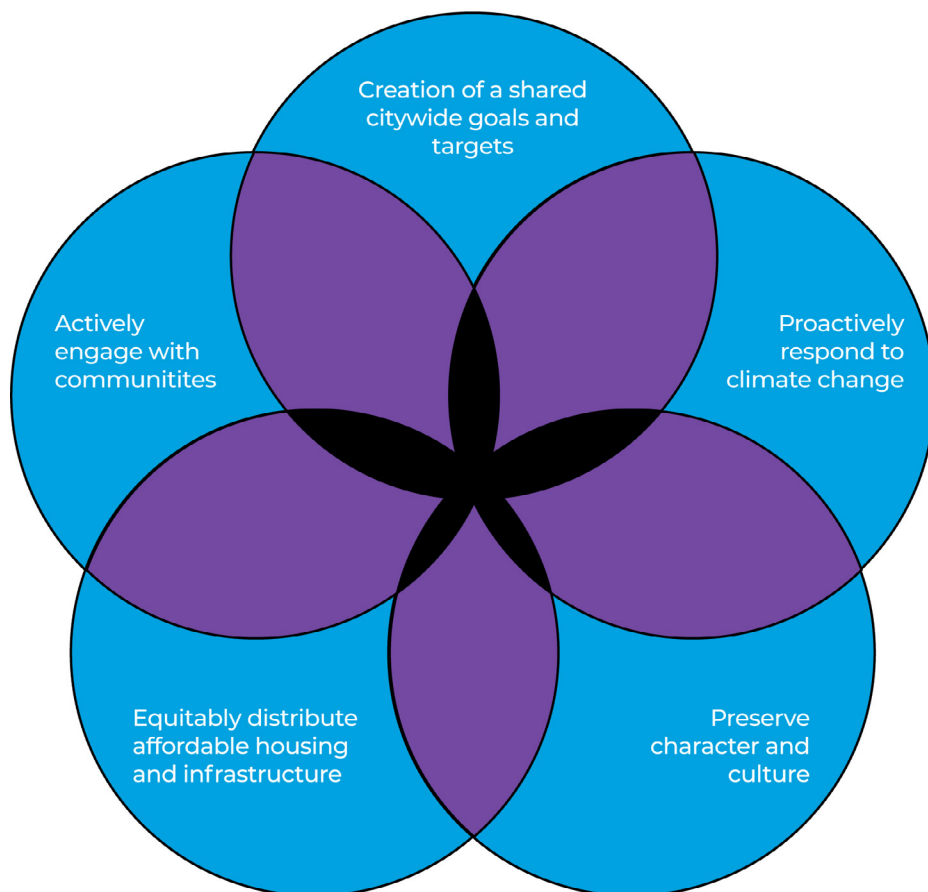
**WHY NEW YORK
CITY NEEDS A
COMMUNITY—
BASED,
COMPREHENSIVE
PLANNING
FRAMEWORK**

While City officials claim that the Zoning Resolution satisfies the State requirement for a “well considered plan,” MAS contends that because the Zoning Resolution is a blunt tool limited to issues related to building density, bulk, and height, it cannot address broader citywide issues such as transit infrastructure, resiliency measures, and historic preservation. Although many opponents of comprehensive planning in New York City traditionally cite the City’s unique size, history, and expansive bureaucracy as reasons a comprehensive plan cannot be effectively implemented, it is precisely because of our city’s history, complexity, and largeness that a shared, citywide vision is necessary. While ULURP provides the public with regimented opportunities for providing input on certain land use applications, it is not a procedure

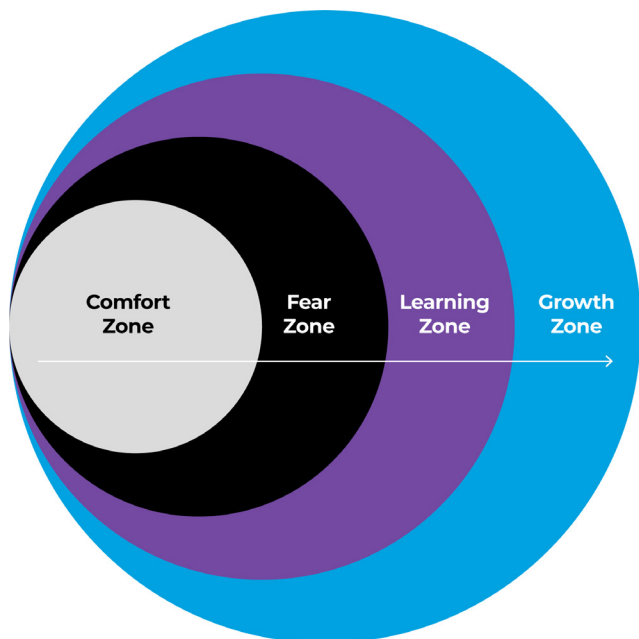
that facilitates city- and neighborhood-level goal setting; rather, it is a piecemeal approach for addressing specific land use actions on a lot-by-lot or neighborhood-by-neighborhood basis.

Given the urgent and interconnected impacts of economic inequality, the affordable housing crisis, and the effects of climate change—most recently evidenced by Hurricane Ida and its devastating aftermath—New York City must embrace a comprehensive planning framework to create a shared, citywide vision based on ongoing community engagement and goal setting.

Without a comprehensive plan outlining collective responsibilities across all neighborhoods, the City cannot effectively address shared issues, such as how the



The mutual benefits of comprehensive planning.



Moving beyond our comfort zone.

City should equitably distribute affordable housing and infrastructure, as well as proactively respond to climate change and sea level rise while preserving the City's character and culture. In fact, it is almost impossible to achieve a truly effective response to climate change without a comprehensive plan, since climate change effects every aspect of New York City's natural and built infrastructure; priority-setting in this area is imperative given the costs and long-term nature of the change required. Compared with the current piecemeal planning process in which certain neighborhoods are chosen by the City to take on more development while others are allowed to remain with the status quo, a comprehensive planning process which begins by establishing citywide goals and targets can ensure trust and ongoing dialogue between City agencies and communities.

“Climate change and the crisis of environmental contamination in New York City is forcing us to deal with the long-term consequences not only of development but of maintenance of the existing infrastructure.”

—Tom Angotti

Community-based, comprehensive planning has the potential to advance equitable growth, inclusion, and actively engage historically marginalized communities at the outset toward a collective vision of New York City. Conversing with national and international practitioners, in addition to studying what works and what does not work in other cities is necessary if New York City is to learn from the past and repair our current piecemeal planning system.

LEARNING FROM OTHER CITIES: A CROSS-CITY EVALUATION

New York City is not so complex in that we cannot learn from other cities' comprehensive planning frameworks, public engagement efforts, data access mechanisms, and implementation strategies. Moreover, since the challenges our city faces are universal—such as affordable housing shortages, sea level rise, and access to quality schools and open space—we must look to other cities for best practices and insight as to how comprehensive planning is best accomplished.

While not exhaustive, the following case studies—London, Vancouver, and Los Angeles—offer insight into how major cities have developed and implemented long-term plans that consider not only traditional issues such as land use, infrastructure, transit, and housing, but equity, climate change, data access, and design. While the legal and governance frameworks may differ in content and terminology, there are basic structural commonalities in cities around the globe, including having a city planning department, a mayoral administration, a legislative body, and neighborhood-level governance organizations. Even though these cities are unique in many ways, they serve as inspiration for a comprehensive planning framework in New York City because they are comparable in population and complexity. (See Appendix A: Cross-City Comparison Chart).

LONDON: PLANNING FOR "GOOD GROWTH"

Released in March, the *London Plan 2021* is Greater London's¹⁴ most recent Spatial Development Strategy. Although the terminology differs, like a comprehensive

plan, the *London Plan* sets out a long-range vision for how London will develop over the next 20-25 years; this includes setting citywide goals for transportation infrastructure and affordable housing. Unlike previous strategic initiatives, the overarching objective of the most recent *London Plan* is the concept of "good growth." This includes promoting inclusive planning and a collective vision for all Londoners—not just growth at any cost.



What is the background for the London Plan?

Since WWII, London's borough councils (the main authorities responsible for running most local services) were required to have local plans; however, this led to a planning gap between local area plans and a strategic vision for the entire city. Consequently, legislation passed in the 2000s required the Mayor of London to publish a Spatial Development Strategy for Greater London. London's 32 borough council plans are legally required to comply with the London Plan.¹⁵ It should be noted that, unlike New York City's as-of-right system, London does not have zoning. New development in London is subject to a highly discretionary review process, where applications must be determined for compliance with the policies and development plans for the area, including the Local Plan, the London Plan, and, if available, the area's Neighborhood Plan.



London skyline (Source: Flickr, The Commons, Mariusz Kluzniak)

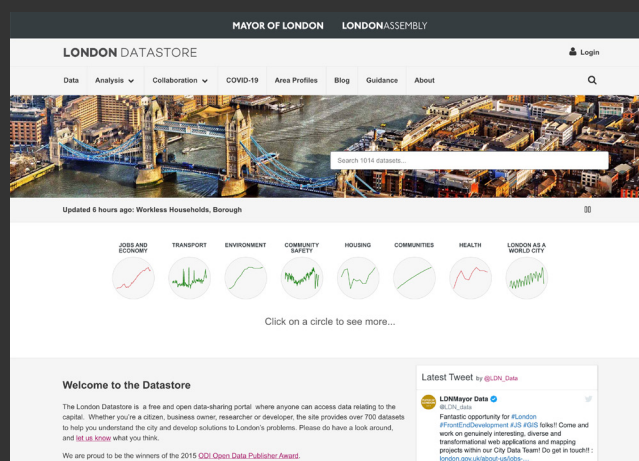
How is the community involved in the planning process?

Early and inclusive engagement with stakeholders was vital for the development of the *London Plan*. At the same time, challenges arose when it came to transferring targeted, community-level engagement tactics to the citywide level. To address this, community engagement had to take many forms beyond the traditional planning department methods such as public hearings. For instance, [Talk London](#) is an online community run by City Hall. Citizens are encouraged to weigh in on big issues that affect their everyday lives—not just issues related to urban planning. This allows the government to be actively engaged with citizens and vice versa. Given COVID-19, the rise of virtual meeting formats also provides opportunities for hybrid engagement models (in-person and virtual) in the post-pandemic world. Lastly, access to open data is a key component for promoting transparency and community engagement in London. The [London Datastore](#) is a free and open data-sharing portal where anyone can access data related to the City and the [Planning London Datahub](#) provides open-access data about all development proposals in London.

What are the next steps?

Regardless of the location, all cities face the challenges associated with implementing comprehensive plans once adopted, especially with politics and changes to mayoral administrations. In the case of London, conducting early outreach in an apolitical way was essential to ensure the plan is drafted and implemented regardless of future leadership changes. Moreover, the *London Plan* includes a chapter devoted to monitoring, which establishes [Key Performance Indicators](#) (KPI) to keep track of trends and objectives established by the Plan. The KPIs assess yearly progress and are reported in a legally mandated Annual Monitoring Report.

Using the *London Plan* as a model, a comprehensive plan for New York City should align zoning with a long-term vision that incorporates numerous City policies, as well as better leverage technology to connect citizens.



London Datastore website
(Source: Greater London Authority)

VANCOUVER: ENGAGING WITH THE COMMUNITY

Begun in 2019, *the Vancouver Plan* aims to be the City's first long-term, strategic plan since it attempted to implement a comprehensive plan in 1995. With the shortage of affordable housing, climate change, and a growing gap between the rich and poor, Vancouver hopes to use the *Planning Vancouver Together* process to actively engage all citizens in promoting an equitable future.

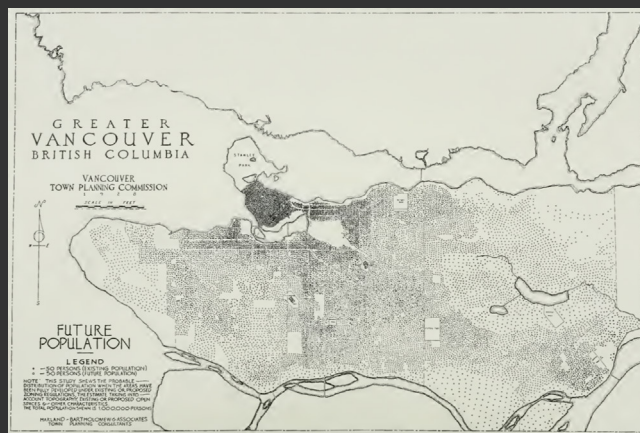
“Vancouver, like New York, is very much at a crossroads right now. We have major development, a major housing crisis, a global pandemic, a climate emergency, and we don’t have a long-range vision for the future of the city. It’s a great time to plan despite the pandemic.”

— Susan Haid

Why plan now?

Before the *Planning Vancouver Together* process started, Vancouver historically utilized area- and various city-wide plans instead of one citywide plan. Moreover, in 2019, Metro Vancouver, the regional political body, started the process of updating its *Regional Growth Strategy* as required by the Regional Growth Strategy Act. Since Vancouver is the only city in the region with its own charter and no

long-range plan, it recognized the urgency citywide planning in order to address its history and plan for the future with the region in mind.



Bartholomew Plan (Source: City of Vancouver, Archives)

One of the main reasons for attempting Vancouver's first comprehensive plan in decades was to examine how the City's history of spatial segregation influenced its current land use patterns and how a new plan could promote spatial equity, housing diversity, and reconciliation. Similar to the redlining that occurred in the United States, Vancouver's first and only complete comprehensive plan, created by Harland Bartholomew in the 1920s, focused investment and infrastructure in low-density residential areas rather than mixed-use areas, and ultimately laid the foundation for Vancouver's current racial segregation.¹⁶ Additionally, one of the most significant aspects of the planning process has been to advance equity and reconciliation with the local First Nations. The process acknowledges that modern-day Vancouver is located on the unceded homeland of the Musqueam, Squamish, and Tsleil-Waututh Nations. The City plans to collaborate and invest in those communities going forward. Given its land use and settler history, in addition to growing inequalities, Vancouver is now engaging residents to gain input for a shared vision of the future.



Vancouver skyline (Source: Flickr, The Commons, Cliff Hellis)

How is community engagement conducted during the COVID-19 pandemic?

Before the pandemic, the process began with the Listen and Learn phase, which initially included in-person engagement efforts about issues facing the City, including outreach events and qualitative surveys. The process focused on equity-seeking groups, such as establishing partnerships with each local First Nation by providing funding for a full-time planner.

Although the COVID-19 pandemic shut down the globe six months after *Planning Vancouver Together* kicked off, the City continued their engagement efforts by shifting and adapting to the virtual world. Conducting planning and engagement during this time brought many challenges to the surface—many residents face “planning fatigue.” However, with the recognition that equity-seeking groups were the hardest hit by the pandemic, many of the partnerships already established before the pandemic were continued. Going forward, Vancouver plans to utilize a hybrid outreach and

engagement approach, including virtual and in-person events to gain the most feedback from residents.

What are the next steps?

As of December 2021, the City is in the “Revising and Final Plan Phase,” with a projected goal of reporting to the City Council in September 2022. Once the final *Vancouver Plan* is adopted, the City plans to develop a framework for regular implementation monitoring, potentially on an annual or bi-annual schedule in terms of tracking targets and metrics. As part of the City’s growth management, Vancouver utilizes [interim rezoning policies](#) to combat development speculation and plan for future growth. This includes [community amenity contributions](#) and providing fees to the City in exchange for developing during a rezoning or planning phase.

Like New York City, Vancouver is a city with a history of segregation, settler colonialism, and lack of comprehensive citywide planning. New York City should look to Vancouver as it strives to plan for an equitable and inclusive future.

LOS ANGELES: INTEGRATING PLANNING AND CIVIC HISTORY

Los Angeles has recently undertaken several initiatives concerning planning, preservation, and civic commemoration. With the development of new plans and policies, LA offers important lessons for New York City.

What is the legal basis for planning?

Since 1969, California state law has mandated that each local government prepare a General Plan that addresses seven required topics, called Elements: land use, transportation, conservation, noise, open space, safety, and housing.¹⁷ Each element must contain goals, objectives, and strategies to guide future decision making. The law also permits local governments to include additional elements, as well as rename,

combine, or separate elements in their general plans to address specific needs for each jurisdiction.

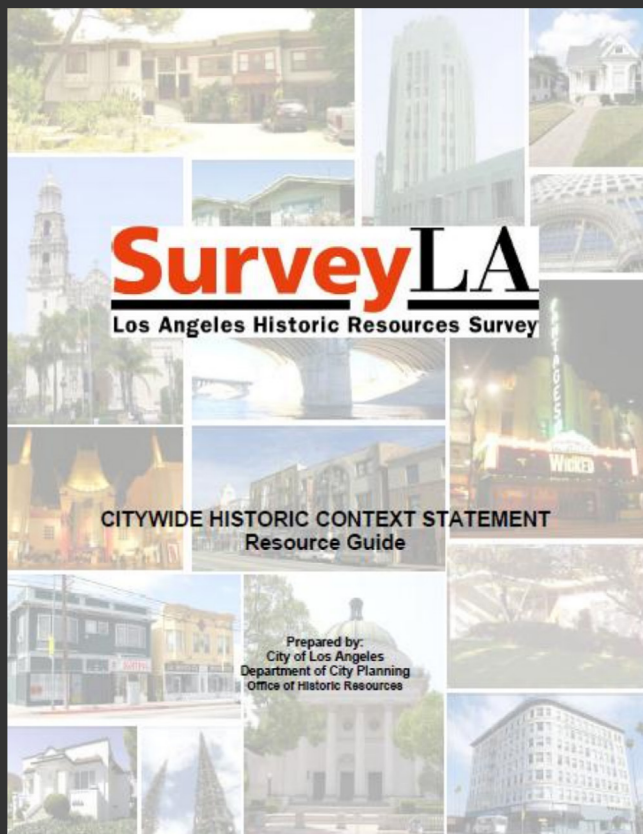
Currently, LA's comprehensive plan is called the General Plan Framework Element, a citywide comprehensive long-range growth strategy. Following the state mandate, LA's Elements include land use, housing, air quality, conservation, health, safety, mobility, infrastructure systems, open space, public facilities and services, and noise. While OurLA 2040, the comprehensive update to the City's General Plan and Elements, is currently on pause, some Elements are in the process of being updated, such as the City's Housing Element.

What is the relationship between planning and civic history in Los Angeles?

In addition to LA's General Plan, the City has 35 Community Plans for each of its Community Plan Areas. The Community



Los Angeles skyline (Source: Flickr, The Commons, Anna Aran)



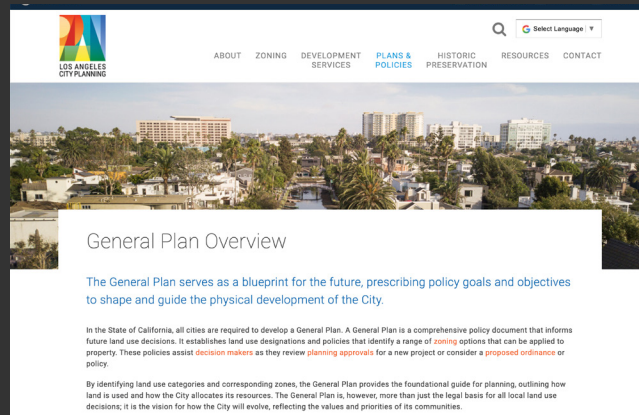
Survey LA: Los Angeles Historic Resources Survey (Source: City of Los Angeles)

Plans contain a policy document and land use map. Additionally, each Community Plan makes up LA's Land Use Element by specifying neighborhood-specific goals and strategies that are also articulated in the City's General Plan. The 35 Community Plans are currently in the process of being updated. Lastly, LA's Zoning Code is a mechanism which implements the General Plan and Community Plans. LA is currently in the process of updating its Zoning Code and released its Proposed Draft of the new Zoning Code in June 2021.

Unlike New York City, which has separate city agencies devoted to city planning and historic preservation, Los Angeles's Office of Historic Resources (OHR) is housed within the City Planning Department. Among other responsibilities, OHR manages the City's online historic resource inventory, HistoricPlacesLA, which includes the results

of SurveyLA, LA's first-ever comprehensive program to identify, record, and evaluate significant above-ground historic resources throughout the City. SurveyLA incorporated feedback from community members regarding socially, culturally, or ethnically significant places and includes cultural resources that are associated with historically underrepresented groups, such as LGBTQ+, African American, Latino, and Asian American landmarks. In addition to documenting historic architectural resources, one of the main purposes of SurveyLA is to guide future planning and development in each of the 35 Community Plan Areas. Although historic resources are currently considered part of the Conservation Element of the General Plan, city officials hope to produce a separate historic resources element in the future by integrating the results of SurveyLA.

Although Los Angeles differs from New York City in terms of its urban fabric, population, and planning framework, the city offers lessons for New York City in terms of developing topic-specific plans and engaging with its civic history.



Los Angeles General Plan website
(Source: City of Los Angeles)

HOW TO MOVE NEW YORK CITY TOWARDS A COMMUNITY— BASED, COMPREHENSIVE PLANNING FRAMEWORK

FEAR ZONE

LEARNING ZONE

GROWTH ZONE

Establish a Shared, Citywide Vision**Give Neighborhoods a Seat at the Table**

- Strengthen Community Capacity
- Prioritize Equitable Distribution of Development
- Promote Climate and Environmental Justice
- Preserve Character and Culture

Transform Planning into Action

- Ensure Transparent and Accountable Implementation
- Connect Capital Planning and Budget Equity
- Improve Environmental Review
- Potential Legal Routes

Towards Comprehensive Planning: Moving Beyond Our Comfort Zone

This section outlines recommendations the City must take to move towards a community-based, comprehensive planning framework. While these interrelated recommendations are most effective when formally integrated into a framework adopted through City Charter reform, the recommendations can be advanced independently through a variety of methods, such as agency decision-making, administrative changes, City Council legislation, and funding allocation through the budget process, to improve the City's existing land use and planning process. As New York City recovers from the COVID-19 pandemic and a new Mayor, Comptroller, and City Council enters office in 2022, the City has an opportunity to embrace a comprehensive planning framework that ensures shared city- and neighborhood-level goals, targets, and policies are aligned to equitably address the city's current and future needs.

ESTABLISH A SHARED, CITYWIDE VISION

A comprehensive planning framework must first establish goals and targets at the city- and neighborhood-level to ensure resources, infrastructure, and development are allocated equitably. A citywide vision

based on early community engagement promotes trust and ongoing dialogue between City agencies and communities as neighborhoods develop plans that align with citywide goals and targets.

→ **Facilitate reconciliation conversations at the Community Board level concerning the City's history of residential racial segregation and environmental injustices.** At the beginning of a citywide comprehensive planning process, the Mayor's Office, Civic Engagement Commission, and other city agencies should organize community reconciliation conversations not only to educate residents about past inequities in the built environment, but inform residents about how these patterns currently impact neighborhoods today, with the goal of reconciling the past, developing recommendations for an equitable comprehensive plan, and, ultimately, increasing trust in the planning process. As part of this process, the Civic Engagement Commission should develop an interactive online map that illustrates past and present inequities.

Many cities today are proactively engaging with the public about the role of racism and past inequities in the planning context. For example, one of the key themes developed during Chicago's pre-planning phase of its [comprehensive plan overhaul](#) is Historical Reckoning & Trust Building. This process is meant to acknowledge and confront the impacts of Chicago's past inequitable planning processes "by serving as a form of mediation and builds from this awareness to center on fostering and maintaining trust."¹⁸ Similarly, [Vancouver's](#) public engagement methods directly acknowledge working with the Indigenous community throughout the comprehensive planning process.¹⁹ Lastly, the Los Angeles [Mayor's Office Civic Memory Working Group](#), first convened in 2019, produced a [report](#) that contained a set of [18 recommendations](#) to help LA equitably engage with its past—whether triumphant or tragic moments in the city's history. The report focused on thematic recommendations such as increasing access to information by creating a new City Historian position and adopting an Indigenous Land Acknowledgment Policy for the City.

- **Conduct an Existing Conditions and Long-Term Needs Assessment at the City and Community District level** using the information and recommendations gathered from the community reconciliation conversations. The Existing Conditions and Long-Term Needs Assessment should be modeled off the "Conditions of the City" report as proposed in the [Planning Together legislation](#). This Assessment must be informed by substantive community engagement and lead to the **development of equitable citywide goals, community-level growth targets, and benchmarks**.

[Tacoma, Washington's Equity Index](#) is an interactive tool that highlights disparities in five categories, including accessibility, economy, education, livability, and environmental health. Similarly, New York City's recently passed Racial Impact Study legislation, which calls for an Equitable Development Data Tool, should be utilized in the future for an Existing Conditions and Long-Term Needs Assessment and subsequent community planning purposes.

GIVE NEIGHBORHOODS A SEAT AT THE TABLE: STRENGTHEN COMMUNITY CAPACITY

For communities to fully engage in the citywide goal setting and community planning phases of a comprehensive planning framework, the City must prioritize ongoing engagement throughout the planning process, provide increased funding and resources to all Community Boards, as well as work in partnership with community organizations to build capacity and plan for their future. While the recommendations outlined below can be implemented regardless of an adopted comprehensive planning framework, to maximize public engagement and improve planning, all the recommendations must be incorporated into any future comprehensive plan. (See Appendix B for more information).

- **Prioritize intentional and consistent public engagement in a variety of formats**, before, during, and after a comprehensive plan is adopted.

- **Develop city- and neighborhood-level community engagement plans** for the entire comprehensive planning process based on input from Community Boards, city agencies, the private sector, nonprofits, and community organizations. These plans, initiated by the Civic Engagement Commission and subject to Community Board approval, must include a budget to bring in local experts, facilitators, translators, childcare, and transit vouchers.
- **Ensure Community Boards are diverse and representative** of the communities they serve to guarantee planning decisions are reflective of community needs.²⁰ The City should update the existing City Charter language requiring Borough Presidents to disclose demographic data on Community Boards and require consistent methodologies and the same level of detail across all Community Boards concerning demographics. Manhattan Borough President Gale Brewer’s demographic tracking practices should be used as a template for the level of detail required. Moreover, the “Community Profiles,”²¹ as codified in the Racial Impact Study legislation, should provide the data for fulfilling the reporting mandate.
- **Develop an ongoing online engagement platform** to encourage continuous dialogue between citizens, agency officials, and the elected, as well as collect opinions, shape plans, policies, and initiatives. This engagement platform should be used throughout the comprehensive planning process and administered by the Mayor’s Office to facilitate discussions, surveys, Q&A sessions, and provide updates on

topics affecting New York City, such as housing, infrastructure, safety, and arts and culture.

Talk London is London City Hall’s online community for communicating ideas to shape plans and policies. Additionally, Seattle’s Department of Neighborhoods produces a central Community Resource Hub, which includes links to webpages such as Seattle’s Get Engaged Toolbox, offering the public information on public participation, civic leadership, and neighborhood safety.

- **Expand the Mayor’s Community Affairs Unit Neighborhood Support Teams** program to encompass all Community Districts. The Neighborhood Support Teams should work closely with Community Boards and the Civic Engagement Commission to aid Community Boards throughout the citywide goal and target setting phase, as well as address quality of life concerns throughout the comprehensive planning process.
- **Increase funding for all Community Boards and Borough President offices** to hire more staff members, perform member training, provide translation services and childcare, and perform public outreach.

“The problem is that Community Boards are underfunded and understaffed. It’s time to learn from and listen to communities and fund Community Boards.”

— Tom Angotti

- **Dedicate funding for full time professional planners for each Community Board** to represent the Community Board during the CEQR and ULURP processes, as well as engage with residents as well as DCP and other City agencies in the planning process.
 - **Strengthen partnerships between City agencies and Community Boards** throughout the comprehensive planning process by assigning designated city planners and other city representatives to each Community Board, including, but not limited to, staff from DCP, Department of Transportation (DOT), Landmarks Preservation Commission (LPC), the Economic Development Corporation (EDC), Department of Small Business Services, and Department of Housing Preservation and Development (HPD).
 - **Require annual trainings** for Community Board members and staff by City agencies concerning land use, zoning, affordable housing development, capital budget, preservation, and transit.
- **Improve community-based planning by strengthening the 197-a planning process** and its connection to a shared citywide vision establishing goals, targets, and benchmarks.
- **Incorporate 197-a plans as part of a future comprehensive planning framework** by ensuring they are utilized as a community-based planning process. 197-a plans should no longer be advisory and instead be required to conform with negotiated Community District- and City-level goals and targets established

in the beginning stages of the comprehensive planning process outlined above. **The Department of City Planning and City Planning Commission must update the existing Rules for Processing of Plans Pursuant to Charter Section 197-a and the 197-a Plan Technical Guide** to develop criteria for accepting 197-a plans that align with the goals and targets established for a citywide comprehensive plan.²² The City must utilize adopted 197-a plans when developing future planning initiatives.

Similar to how 197-a plans can be integrated into a citywide comprehensive plan for New York City, Los Angeles' 35 Community Plans makes up the General Plan's Land Use Element. These Community Plans specify neighborhood-specific goals, policies, and strategies, which are articulated in the City's General Plan.

- **Utilize the Equitable Development Data Tool**, as codified in the Racial Impact Study legislation, **for proactive community planning purposes** such as Community District Needs Assessments, delivery of programs and budget allocations, and applications such as anti-displacement and anti-tenant harassment policies.

GIVE NEIGHBORHOODS A SEAT AT THE TABLE: PRIORITIZE EQUITABLE DISTRIBUTION OF DEVELOPMENT

Once a shared, citywide vision is established outlining goals and targets at the city and neighborhood level, the City must ensure affordable housing, infrastructure, transit, parks and open space, schools, and other neighborhood amenities are equitably distributed to correct past injustices as well as balance future growth and community needs. The recommendations below are most effectively utilized in conjunction with a citywide comprehensive planning framework to ensure that as residential development grows, community needs are met and adequate mitigation is enforced.

→ **Balance community needs and citywide targets** based on ongoing community engagement as part of a comprehensive planning framework.

- **Develop Citywide Equitable Development Goals and an Implementation Plan** based on early civic engagement. Using the Existing Conditions and Long-Term

Needs Assessment recommended above as a starting point, the Goals and Implementation Plan should define equitable development as well as specifically set out how to meet neighborhood needs. While the City should be applauded for its recent commitment to produce the Equitable Development Data Tool, as the Tool is developed further, the tracking of the data must be improved with explicit goals, targets, and overall direction for how policies, investments, and other tools are working to achieve those outcomes.

Seattle defines equitable development as “public and private investments, programs, and policies in neighborhoods that take into account past history and current conditions to meet the needs of marginalized populations and to reduce disparities so that quality of life outcomes such as access to quality education, living wage employment, healthy environment, affordable housing and transportation, are equitably distributed for the people currently living and working here, as well as for new people moving in.” [Seattle’s Equitable Development Implementation Plan](#) provides guidance for lessening inequities and implementing Seattle’s comprehensive plan.

Technical Advancement and Support of Comprehensive Planning and CEQR Reform (TASC): TASC is the culmination of recent efforts by MAS and Regional Plan Association (RPA) to strengthen New York City’s environmental quality review regulations and push for citywide comprehensive planning. As stated in the March 2021 white paper, *Up to the TASC: Incorporating Data into CEQR and Comprehensive Planning*, created by MAS and RPA in partnership with New York University’s Guarini Center on Environmental,

Energy and Land Use Law, TASC is a community mapping tool that incorporates an extensive array of planning and social vulnerability factors based on regulatory, real estate, neighborhood conditions and socioeconomic conditions at the city tax lot level, that can be used by communities to formulate future development scenarios in their neighborhoods. As a community planning tool, TASC provides a forum for planning educational purposes and a way to gather input to meet the specific needs of New York neighborhoods.

- **Ensure neighborhood and district-level plans, such as 197-a plans, conform to city- and neighborhood-level targets** as specified in the Existing Conditions and Long-Term Needs Assessment, as well as the Equitable Development Goals specified above, to ensure balanced growth among all neighborhoods.

- **Strengthen Fair Share Criteria and coordinate with a future comprehensive planning framework.** The City should require regular updates to the Fair Share Criteria to account for changes in city and neighborhood facility needs, in addition to shifts in demographics. This should include opportunities for public comments by formalizing the Fair Share Criteria updates through the rulemaking process, rather than act as guidelines, as recommended by the [NYC Council Report on the 2019 Charter Revision Commission](#).

→ **Promote equitable and inclusive neighborhoods** as part of a comprehensive planning framework to improve livability, health, education, and social infrastructure. (See Appendix B for more information).

- **Prioritize NYCHA in a future comprehensive planning process through ongoing engagement and increased funding and investments** as they anchor the City's racially and ethnically concentrated areas of poverty (R/ECAP), house the City's most vulnerable residents, and have

been systemically underinvested in and continue to have outstanding repairs. **The City must include affected NYCHA campuses in any future City-sponsored rezoning plans** so that NYCHA residents can benefit from planned infrastructure and community investments.

- **Study and recommend specific place-based strategies as part of a comprehensive planning process to improve the livability and quality of life for each neighborhood as it grows.** As the City plans for new housing development in areas that can take on more density, it must also ensure residents of historically underinvested areas are targeted for neighborhood investments. This includes increasing equitable access to parks and open space, libraries, hospitals, and transit, as well as developing land use plans that take school capacity into account.

- **Integrate existing fair housing plans and policies into a citywide comprehensive plan** to holistically coordinate strategies that promote equity, housing choice, and decrease residential segregation. This includes the [Housing New York 2.0 plan](#), [NextGeneration NYCHA plan](#), [Where We Live NYC Plan](#), tenant anti-harassment protection policies, and [Turning the Tide on Homelessness plan](#).

What is fair housing? Affirmatively Furthering Fair Housing (AFFH) is a provision of the Fair Housing Act. AFFH requires HUD and recipients of federal funds to take “meaningful actions to

overcome patterns of segregation and foster inclusive communities.”²³

This strategy should be modeled off of the recommendations in the [Right to a Roof report](#), written by a coalition of housing advocacy organizations, which calls on the next mayoral administration to create and implement an Integrated Housing Plan to coordinate one overall strategy focused on eliminating homelessness and promoting racial equity.

- **Identify and recommend steps to combat exclusionary zoning practices to further fair housing** as part of a comprehensive plan.
- **Preserve existing affordable housing as well as create 100% affordable housing in high-opportunity areas** to further desegregation efforts, specifically in high-performing school districts.²⁴
- **Analyze and offer recommendations on balancing historic preservation with the need for more affordable housing opportunities**, such as identifying City-owned properties for development and studying how to achieve a nexus for historic districts taking on additional density.
- **Explore growth management tools** as a component of a comprehensive planning framework to encourage equitable development as well as dampen real estate speculation, limit displacement, generate funding, and promote balanced planning.
- **Establish a Mayoral Growth Management Task Force** to evaluate

how certain growth management mechanisms can be utilized to promote sound planning and equitable growth. The Task Force should include officials from the Mayor's Office, city, regional, and state agencies, academics, advocacy organizations, and community groups. This Task Force should be formed regardless of adopting a comprehensive planning framework; however, the findings are most effectively used in tandem with a comprehensive planning framework. (See Appendix B for more information).

GIVE NEIGHBORHOODS A SEAT AT THE TABLE: PROMOTE CLIMATE AND ENVIRONMENTAL JUSTICE

As climate change, sea level rise, and rising temperatures increase in urgency and exacerbate social and economic vulnerabilities, a proactive, fundamental shift in planning and development must take place. The recommendations below, while not exhaustive, outline multiple pathways the City must take to address climate change and environmental justice within a comprehensive planning framework since climate change effects every aspect of New York City's built infrastructure.

What is growth management? Growth management refers to various strategies and policies that governments use to guide sound development while minimizing the

negative effects of ill-conceived growth. Growth management can take many forms, including temporary land use moratoria, monetary contributions to offset certain development impacts, and growth-capping laws.

→ **Ensure equitable, sustainable, and resilient initiatives and development** are part of all future comprehensive planning efforts, as well as land use and zoning, infrastructure, capital planning, and budgetary decisions.

▫ **Implement and coordinate Intro. 1620-A.**

1620-A, a recently passed City Council bill that calls for the creation of a citywide climate adaptation plan every ten years by the Office of Long-Term Planning and Sustainability (OLTPS), with future comprehensive planning efforts, as well as land use and zoning, capital planning, infrastructure, and budget decisions.

While a significant step in moving the City towards more coordinated climate adaptation planning, the planning process must incorporate community engagement and public comment milestones prior to plan adoption as well as include an amendment process every 5 years. **Going forward, the Plan should:**

◇ **Prioritize NYCHA campuses**

considering many campuses are in floodplains and are historically underinvested. The Plan must immediately address retrofitting campus infrastructure and facility investments to combat future sea level rise and stormwater flooding, as well as coordinate with NYCHA's existing Climate Mitigation Roadmap.

◇ **Analyze and offer recommendations on long-term, equitable relocation strategies for the most vulnerable communities** due to sea level rise, storm surges, and stormwater flooding. The City must coordinate and plan with regional, state, and federal agencies about buyout strategies, potential building moratoriums, and increased funding for building retrofits.²⁵ This also includes coordinating long-term capital planning with the Zoning Resolution and the Building Code to discourage development in high-risk areas.

◇ **Coordinate with existing sustainability, resiliency, and energy requirements as specified in City, State, and federal laws**, such as the New York City Climate Mobilization Act, the New York State Climate Leadership and Community Protection Act, the New York State Community Risk and Resiliency Act, as well as coordinate with the New York City Panel on Climate Change (NPCC). At the very least, the plan should utilize high-range sea level rise projections for the year 2100.

City Initiatives to Build On: The citywide climate adaption plan should integrate the goals and strategies of existing agency plans and initiatives, such as the Comprehensive Waterfront Plan, the

Stormwater Resiliency Plan, and the recently-released report The New Normal: Combating Storm-Related Extreme Weather in New York City.

- **Allocate increased funding and provide ongoing investment towards vulnerable communities and outdated infrastructure, as well as provide funding and increased staffing for city agencies**, such as the Mayor’s Office of Climate Resiliency, the Office of Climate and Sustainability, NYCHA’s Recovery and Resilience Department, and NYCHA’s Energy & Sustainability Programs Department.
 - **Track and evaluate the success of the City’s Climate Resiliency Design Guidelines pilot project**, as codified in [Local Law No. 41 of 2021](#), and fully coordinate with a future comprehensive planning framework, capital project planning, and the New York City Building Code. The pilot program must **include the preservation of historically recognized, City-funded projects** as examples of sustainable retrofits and fully coordinate with LPC and the State Historic Preservation Office (SHPO).
- **Prioritize Environmental Justice** as the City plans for the future.
- **Coordinate and align the City’s [Environmental Justice for All Report](#) and future Environmental Justice Plan with a comprehensive planning framework.** The Existing Conditions

and Long-Term Needs Assessment conducted at the beginning of a citywide comprehensive planning framework must **identify and account for environmental injustices of the past and center existing environmental justice communities**. Neighborhood plans, such as 197-a plans, must **develop community-led strategies for rectifying past environmental inequities**.

In 2017, the New York City Council passed [Local Law 60](#), requiring the City to conduct a comprehensive study of the current state of environmental justice in New York City (“the Environmental Justice for All Report”). City Council also passed [Local Law 64](#), calling for the establishment of an Advisory Board composed of environmental justice advocates, academics, and public health experts to work with the City on the Environmental Justice for All Report.

Fight For Light: In early 2019, MAS and New Yorkers for Parks (NY4P) joined together to build a broad advocacy campaign called [Fight for Light](#). Fight for Light grew out of our shared concerns about the lack of an effective park shadowing policy for New York City. However, it quickly expanded to focus on the role of the public realm in improving the health of New York City residents and addressing the urgent demands for climate change solutions.

A comprehensive plan for New York City will better align zoning with the long-term goals and objectives, including better coordination regarding the public realm, strengthening shadow limits, and improving solar access regulations. Because sunlight relates to a wide range of planning issues, a comprehensive approach is needed to proactively identify solutions to protect access to it.

GIVE NEIGHBORHOODS A SEAT AT THE TABLE: PRESERVE CHARACTER AND CULTURE

Balancing preservation of buildings, culture, character, and small businesses must be part of any comprehensive planning framework if New York City is to address past injustices and plan for an equitable future. While the preservation and placemaking recommendations below must be incorporated into any comprehensive planning framework, the City should prioritize these recommendations to ensure that New York City's inevitable change reinforces its character and does not undermine it.

→ **Promote the Landmark Preservation Commission's Equity Framework as part of a comprehensive planning framework** to further the principles of equity and inclusion in the City's preservation and placemaking efforts.

- **Ensure historically underrepresented groups, neighborhoods, buildings, places, and cultural aspects are preserved in coordination with a comprehensive plan** through a robust community engagement process. The City should also ensure new development is compatible with existing historic buildings and districts.
- **Strengthen coordination, collaboration, and long-term planning between LPC, DCP, and HPD by establishing a Division of Preservation and Placemaking within DCP.** Whether this is a new

division or is located within an existing DCP division, staff should be tasked with improving coordination, communication, planning, and urban design among DCP, LPC, HPD, OLTPS, and SHPO in relation to City-sponsored rezonings and new development within or adjacent to historic districts, as well as future comprehensive planning efforts.

Unlike New York City, which has separate planning and preservation departments, Los Angeles's Office of Historic Resources is housed within the City Planning Department. This ensures planning, preservation, and placemaking are integrated. Considering the recently published *Where We Live NYC Plan*, which identifies historic districts and high opportunity neighborhoods as strategies for increasing both affordable and market-rate housing production, more coordination and communication between New York City planning and preservation agencies is urgent.

- **Conduct a historic resources inventory**, similar to SurveyLA, with adequate community input **in tandem to a citywide Existing Conditions and Long-Term Needs Assessment** at the beginning stages of a comprehensive planning process. This inventory should not be limited to traditional preservation of buildings, but inform which landmarks, historic areas, scenic resources, and cultural anchors should be preserved in the future as well as inform citywide and neighborhood planning and placemaking efforts.

- **Prioritize equitable economic development** as part of a comprehensive planning framework by promoting small business recovery due to the consequences of the COVID-19 pandemic.
 - **Work in partnership with community and advocacy organizations to evaluate and develop initiatives focused on supporting, preserving, and adaptively reusing local manufacturing areas** throughout the City as part of a comprehensive planning framework. These initiatives should promote equitable economic development and workforce development in connection with other placemaking initiatives. This collaboration should be modeled off areas such as the Manhattan Garment District, which has protective zoning in place that keeps this pocket of manufacturing and creativity alive, and the Special Brooklyn Navy Yard District, which is a recently approved rezoning to develop a modern manufacturing campus by expanding its facilities and working in partnership with local institutions.
 - **Conduct an immediate citywide survey documenting pressures on small businesses and other community anchors in light of the COVID-19 pandemic**, in addition to offering recommendations on ways forward.²⁶ This citywide survey, conducted by the Department of Small Business Services, should consider data from the NYC Storefront Registry.
- **Promote partnerships with existing economic development coalitions, such as the NYC Inclusive Growth Initiative, United for Small Business NYC, and the Street Vendor Project**, to further the City's small business recovery, prevent displacement, and promote equitable development as a component of a comprehensive plan. This includes improving existing relief programs, increasing funding opportunities, and providing legal and other technical assistance to small business owners and commercial tenants. Moreover, as the City continues to raise the cap on the number of street vendor permits and licenses, it must provide concrete implementation strategies and recommendations on improving the use of public space for street vendors and the public.
- **Establish a Task Force to develop a framework for broadening recognition and protection of sites integral to community identity** with an emphasis on how to formulate a **legacy business program** in New York City. Building off of the City Council's 2017 report *Planning for Retail Diversity*, the Task Force, in partnership with community organizations, non-profits, and elected officials, should publish a report evaluating how a legacy business program should be structured in relation to existing historic preservation and planning laws, as well as a future comprehensive planning framework. The Task Force

What are community anchors? Community anchors are places where collective identity is created and stored. They are incubators of

culture and safe havens where New Yorkers find connection with one another and with past generations.

should offer recommendations concerning potential new categories of preservation designations, tax incentives, community ownership models, and grants.

San Francisco pioneered protections for community-serving establishments with the country's first Legacy Business Registry and Preservation Fund. London lists Assets of Community Value, which have more restrictive land use processes and an opportunity for community acquisition. Austin has the Six Square Cultural District linking creative placemaking, preservation, and economic development to advance quality of life for black residents.

TRANSFORM PLANNING INTO ACTION: ENSURE TRANSPARENT AND ACCOUNTABLE IMPLEMENTATION

Once a comprehensive plan is adopted, one of the most significant phases is the implementation phase. The recommendations below outline steps to strengthen coordination and stakeholder review after a plan is adopted, ensure future land use decisions are aligned with a comprehensive plan, and guarantee a comprehensive plan is carried through based on transparent milestones and data disclosure. All the recommendations are necessary components of a comprehensive planning framework to ensure it is adequately implemented.

→ **Establish citywide short-, medium-, and long-term implementation goals and strategies as part of a comprehensive planning framework** on policy topics such as transportation and affordable housing. Breaking up the City's goals and strategies based on a chronological period will allow elected officials, policy makers, and community members to realistically chart the sequencing of policies and projects.

Minneapolis 2040's Implementation Chapter of the City's comprehensive plan provides a table of primary implementation strategies by topic, based on short- (0-5 years), medium- (5-10 years), and long-term (10 or more years) goals. The chart also indicates the lead city department and key agency to execute the goals and strategies.

→ **Ensure future land use and zoning applications are consistent with adopted community plans and a citywide comprehensive plan.**

- **Develop criteria for how to evaluate whether future land use applications are consistent**²⁷ with the goals and policies specified in community plans, a citywide comprehensive plan, agency strategic plans, and other capital planning efforts. As part of a comprehensive planning framework, the City must **establish "consistency criteria"**²⁸ to ensure that the comprehensive plan is implemented, and the appropriate use, density, and bulk will be built.

Memphis 3.0, the city's comprehensive plan, specifies six legally mandated elements for planning officials to consider for a land use application's consistency with the comprehensive plan, such as the City's Future Land Use Planning Map and the degree of change map.²⁹

▫ **Establish a process to allow affected communities to weigh in and negotiate on a land use application's consistency with the comprehensive plan**

once consistency criteria is established, similar to the cross acceptance process recommended in the 2018 report *Inclusive City*. This process will ensure community and citywide goals are aligned and should lead to publishing the alignment findings publicly.

▫ **Create an interactive Future Land Use Map (FLUM)** to function alongside the City's existing Zoning Map as part of the comprehensive planning framework. A FLUM guides land use for every parcel in the City and identifies areas that could be subject to change according to adopted growth strategies. A FLUM should be utilized in tandem with the consistency criteria described above; any change to the City's existing Zoning Map must be consistent with the guidance specified in the FLUM and the comprehensive plan.

Similar to cities such as Seattle and Austin, a FLUM should guide land use applicants and city officials when evaluating how an individual land use application aligns with community plans and a citywide comprehensive plan.

→ **Improve agency coordination and capacity**

to effectively work with stakeholders to carry out a comprehensive plan's goals, policies, targets, and benchmarks.

▫ **Define and coordinate City agency roles in a comprehensive planning framework**, especially regarding the interagency relationships between DCP, CPC, DOT, LPC, EDC, the Mayor's Office, the Office of Management and Budget (OMB), and the Comptroller's Office.

▫ **Strengthen agency organizational capacity** by allocating more funding and resources to increase staffing for planning initiatives, such as the Department of Housing Preservation and Development's Office of Neighborhood Strategies and the Department of City Planning's PLACES initiative.

→ **Require regular audits, reporting, reviews, and amendments** throughout a comprehensive planning cycle.

▫ **Mandate annual reviews as well as reporting and auditing requirements** to ensure accountability and transparency in the implementation phase. Annual reviews and auditing should be performed by the

What is cross acceptance? "Cross acceptance is a negotiation process to compare and achieve alignment between plans for overlapping

places produced by different entities, in this case, community plans and the comprehensive planning framework."³⁰

Comptroller's Office and incorporate community input to improve future planning and implementation efforts. Reports and monitoring should be publicly accessible online and include information pertaining to housing access, CEQR mitigation implementation, growth management strategies, community engagement metrics, budget equity, and climate resilience initiatives.

Seattle's Office of Planning and Community Development coordinates and publishes various monitoring efforts in order to respond to the needs of the community. This includes the Equitable Development Monitoring Program, which reports and analyzes indicators such as displacement risk and neighborhood change.

- **Increase data access, transparency, and maintenance** to improve accountability and facilitate use of open data by all citizens in the planning process.
 - **Create a centralized, publicly accessible, and searchable online library that contains all of the City's long-term strategic plans.** At a minimum, users should be able to sort by responsible City agency, topic, year published, and plan status to ensure transparency, accountability, and adequate understanding of the relationship between plans as well as plan implementation. This interactive library should coordinate with and publish any plans involved with a future comprehensive framework.
 - **Establish a Working Group as part of the Mayor's Office of Data Analytics to improve transparency and accessibility of government data information** in relation to policy

making, public health, land use and planning, public safety, and economic development. The Working Group should collaborate closely with City agencies, particularly the New York City Department of Information Technology and Telecommunications (DoITT), the Center for Innovation through Data Intelligence, OMB, and DCP, as well as non-profits, academic institutions, and community organizations. **The Working Group should:**

- ◇ **Identify data access barriers**, such as data not being collected or preserved on a consistent basis, lack of public knowledge of where data exists or how to access such data, and confidentiality or privacy concerns.
- ◇ **Provide recommendations for improving data maintenance, access, and coordination** amongst the City's existing data portals and trackers.
- ◇ **Analyze and provide guidance on how the City's existing data portals can align and work in tandem with a citywide comprehensive planning framework**, especially concerning portals such as NYC Open Data, the NYC Rezoning Commitments Tracker, and the citywide capital projects database as mandated in Local Law 37 of 2020.
- ◇ **Establish a data dictionary** for all City agency data portals to improve data interoperability³¹ and the public's understanding of basic data terminology.

- ◆ **Identify and provide recommendations for improving public understanding concerning data information** basics and access, especially in relation to a comprehensive planning framework.

British Columbia's Office of the Information & Privacy Commissioner identifies emerging data issues affecting information access and privacy. Additionally, Vancouver's Open Data Portal is an example of a portal with an effective user interface (including the ability to generate immediate, ad-hoc visualizations that source data from multiple datasets), as well as clear data integration and alignment across city agencies.

TRANSFORM PLANNING INTO ACTION: CONNECT CAPITAL PLANNING AND BUDGET EQUITY

An effective comprehensive plan coordinates how the City allocates resources to achieve equitable economic, environmental, and development goals. The City must strengthen its capital planning process to better align land use and zoning decisions with the City's budget considerations. The recommendations below outline methods to improve the relationship between capital planning, the City's budget process, and a future comprehensive planning framework in order to allocate future resources and infrastructure equitably.

- **Connect capital planning and budget equity** with a comprehensive planning framework.

- **Align the goals contained in the capital budget, Ten-Year Capital Strategy, Capital Commitment Plan, agency-specific strategic plans, and future rezonings with a citywide comprehensive plan** to promote transparency and accountability. All capital plans should provide an adequate assessment of current and future infrastructure and budget needs in relation to land use priorities across all communities. The City should utilize the **Citywide Equitable Development Goals and Implementation Plan** recommended above, as well as the Equitable Development Data Tool as codified in the Racial Impact Study legislation, to coordinate capital planning goals and targets.
- **Develop a publicly accessible budget mapping tool** to ensure transparency and equity in the budget decision-making process, especially regarding the allocation of funding, resources, and infrastructure. This geospatial mapping tool should illustrate the City's revenues and expenditures for each fiscal year based on Community Districts, the type of funding, funding category, and capital projects in order for community members, elected officials, and policymakers to better understand City spending.

Portland's Budget Mapping Tool provides a graphic representation of the City's revenues and expenditures based on neighborhood coalitions. Portland also produces a Budget Mapping Users' Guide based on each fiscal year's Budget Map.

→ **Coordinate capital project planning with Fair Share Criteria and a comprehensive planning framework.**

- **Align capital project planning with necessary infrastructure investments** due to planned rezonings and other future land use changes as set out in a comprehensive plan.
- **Prioritize areas that are currently overburdened** with City facilities by allocating more capital investment to individual neighborhood needs and amenities to account for historic patterns of unequal distribution. The City should utilize the Existing Conditions and Long-Term Needs Assessment specified above in conjunction with the Citywide Equitable Development Goals and Implementation Plan.

TRANSFORM PLANNING INTO ACTION: IMPROVE ENVIRONMENTAL REVIEW

In conjunction with a comprehensive planning framework, the City must prioritize improving the CEQR process to adequately identify and mitigate harmful effects of future development as well as allow more users to access and understand information within environmental review documents. The recommendations below outline improvements to the CEQR process and the *CEQR Technical Manual* in relation to a future comprehensive planning framework.

→ **Coordinate the CEQR process with a comprehensive planning framework, community planning initiatives, and fair housing goals.**

- **Incorporate community engagement milestones early in the CEQR process with scenario planning**, which should weigh multiple alternatives (including community plans), to ensure more predictability, trust, and, ultimately, reduce litigation and community opposition, as suggested by RPA.
- **Include criteria for evaluating fair share and fair housing in the *CEQR Technical Manual*** to assess whether a project promotes equitable distribution of City facilities and affirmatively furthers fair housing goals, as suggested by RPA and the 2018 report, *Inclusive City*.³² This recommendation must be incorporated into a future comprehensive planning framework to ensure new development does not exacerbate residential segregation.
- **Release publicly accessible data and models conveying projected and potential development sites contained in all Environmental Impact Statements (EIS)** to promote community planning initiatives, transparency, and community engagement during a comprehensive planning process. This data should be included on the NYC Open Data website and on DCP's Zoning Application Portal in easily usable formats including spreadsheets and shape files.

NYC's Open Data is a collection of freely downloadable data produced, used, and published by New York City agencies and other partners, by codification in local laws and through administrative practices.

- **Require public review of the CEQR Technical Manual every three years** to account for changes in technology, the environment, and demographics, as well as to ensure accountability. The *CEQR Technical Manual* public review process must be fully coordinated and aligned with a future comprehensive planning framework.

→ **Convene a Working Group to study and provide recommendations for the use of Generic Environmental Impact Statements (GEISs)** prior to the adoption of a comprehensive planning framework. The Working Group should include, but not be limited to, elected officials, agency officials (particularly the Mayor's Office of Environmental Coordination (MOEC) and DCP), Community Board representatives, Borough President representatives, practitioners, advocacy and community organizations, and academics.

The Working Group should:

- **Weigh the costs and benefits** of performing citywide, boroughwide, and Community District-wide GEISs, as well as evaluate how GEISs can balance site-specific environmental concerns.
- **Develop criteria for the use of**

supplemental EISs for site-specific projects, as recommended by RPA, or **'tiered reviews'** to match a neighborhood context, as mentioned in New York University Guarini Center's report *Reforming CEQR: Improving Mitigation under the City Environmental Quality Review Process*.

TRANSFORM PLANNING INTO ACTION: POTENTIAL LEGAL ROUTES

The legal and policy routes required to implement the recommendations above range from agency decision-making (such as ensuring historically underrepresented groups are represented in the city's preservation efforts), administrative changes (such as updating the *CEQR Technical Manual*), passage of City Council legislation (such as the development of a publicly accessible budget mapping tool), to funding allocation through the budget process, and, lastly, City Charter reform.

If there is to be a true shift in the land use process toward a balancing of top-down and bottom-up planning with substantive community involvement, MAS believes City Charter reform, rather than City Council legislation, should establish an equitable comprehensive planning framework.

MAS CEQR Advocacy: MAS has long been one of the City's strongest advocates for CEQR reform. In recent years, we have testified at the New York City Council and published two comprehensive reports that highlight ways to strengthen the CEQR process. *SEQRA and Climate Change*, released in 2009, raised the

importance of measuring greenhouse gas emissions for projects subject to CEQR. In 2018, MAS released *A Tale of Two Rezoning: Taking a Harder Look at CEQR*, an in-depth comparative analysis of projected and actual development fostered by the rezonings of Long Island City (2001) and Downtown Brooklyn (2004).

The recommendations below concentrate on City Charter reform and potential regional and state-level efforts.

→ City Charter Reform

- **The next mayoral administration or City Council must convene a City Charter Revision Commission** focusing on comprehensive planning, equity, land use, and civic engagement. Although not exhaustive, using the [City Council's report to the 2019 New York City Charter Revision Commission](#) as a starting point, **the Commission should evaluate and provide recommendations concerning:**

- ◆ **A citywide comprehensive plan** that integrates existing land use, capital planning, budgetary, and strategic planning processes. The comprehensive plan should provide frequent public engagement milestones as well as periodic milestones for plan amendments.
- ◆ **Improvements to Community Board engagement** during the ULURP, CEQR, and comprehensive planning processes.
- ◆ **Changes for strengthening the power and feasibility of the 197-a planning process** as a component of the comprehensive plan process.
- ◆ **Ways to improve transparency, agency coordination, and the balance of power in the ULURP process.**
- ◆ **Updates to the requirements surrounding the Fair Share Criteria** on a consistent basis as recommended by the [NYC Council Report on the 2019 Charter Revision Commission](#).

→ Regional and State Level Reform

- **Establish a New York City Regional**

Task Force to study, evaluate, and offer recommendations on how to strengthen regional planning and coordination in the New York City metropolitan area

given the interrelatedness of the region's challenges. The Regional Task Force should include New York, New Jersey, and Connecticut stakeholders in government, particularly New York City Department of Planning's Regional Planning Division, elected officials, planning and advocacy organizations, and community representatives.

The Task Force should:

- ◆ **Develop a regional public engagement process** to provide recommendations on topics such as improving regional transit infrastructure, furthering fair housing and equitable distribution of development throughout the metropolitan region, coordinating climate adaptation efforts, and strengthening economic development.
- ◆ **Coordinate with and incorporate the data and demographic trends put forth in RPA's [Fourth Regional Plan](#)**, which offers specific recommendations for improving equity, prosperity, health, and sustainability in the New York metropolitan region.

Los Angeles is part of a voluntary regional governance structure called the [Southern California Association of Governments](#), which coordinates with local jurisdictions and develops long-range plans on issues affecting the region, such as housing, transportation, and economic development.

- ◇ **Study the relationship of city comprehensive plans and regional planning frameworks** in other states to provide recommendations about reforming existing New York State planning legislation, or potentially developing new legislation incentivizing regional goal setting and planning.

Washington State's Growth Management Act offers a model for requiring large cities to create comprehensive plans that comply with other plans in the region and update them regularly. Consequently, the goals and policies set out in Seattle 2035, the city's comprehensive plan, complies with the Puget Sound Regional Council's Vision 2040 and the King County Countywide Planning Policies.

CALL TO ACTION

Several steps can be taken immediately to advance comprehensive planning in New York City:

1. Convene a City Charter Revision

Commission focusing on comprehensive planning, land use and equity, ULURP, and civic engagement.

2. Strengthen partnerships and engagement between new political leaders and Community Boards concerning long-term citywide comprehensive planning

to build trust and promote collaboration in the land use process.

3. Provide increased funding and resources for all Community Boards and Borough President Offices in the next budget process

to fully engage in community-based planning.

4. Utilize the Equitable Development Data Tool for proactive community planning purposes

to identify and invest in rectifying disparities in historically underrepresented neighborhoods concerning access to affordable housing, parks and open space, schools, and transit.

5. Implement Intro. 1620-A in coordination with existing City policies and plans

based on robust community outreach to fully address the consequences of climate change.

6. Identify and prioritize solutions that help facilitate a comprehensive planning framework

that creates a shared, action-oriented citywide vision balancing community and citywide needs.

New York City can no longer maintain the status quo. The steps outlined above are critical for improving the City's current land use and planning approach. Interrelated challenges such as climate change, affordable housing, school capacity, access to transit, and economic inequities must be addressed through community-based, comprehensive planning if we are to achieve a more livable city.

“Does New York City want to be a total economic powerhouse or does it want to be a collection of community neighborhoods that are highly resilient? New York’s own sense of identity needs to shine through in its plan. What does it want to be and achieve?”

—Lisa Fairman

CONCLUSION

New York City is at a crossroads. If we continue with our current piecemeal planning approach, it will further exacerbate disparities between neighborhoods. We believe a fundamental shift towards a more comprehensive, collaborative, and equitable approach to planning should outline current and future needs of our changing city while also responding to community-level needs. While there are numerous challenges associated with long-term planning for a city of 8.5 million people, we cannot afford to wait.

Comprehensive planning holds the promise to embody a balanced approach to the allocation of resources and address unique neighborhood challenges to manage equitable growth, increase access to opportunity, and expand housing choice. An effective framework proactively engages all communities throughout the process from the outset, balances top-down and bottom-up planning by identifying key principles, goals, and targets at the city and neighborhood level, and, lastly, develops an equitable implementation plan for achieving those goals and eliminating historic disparities. Without a citywide framework, we cannot effectively respond to the interconnected challenges of climate change, affordable housing, economic inequalities, and more.

As New York City recovers from the COVID-19 pandemic, plans for a future with more extreme weather, addresses income inequality, residential and business displacement, and rebuilds our aging infrastructure, we must embrace a comprehensive planning framework.

APPENDIX A: CROSS-CITY COMPARISON

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City	Population	Total Area (sq miles)	Population Density (People/sq mile)	Comprehensive Citywide Plan	Year Adopted	Legally Mandated?	Length of Comprehensive Planning Cycle	Is the citywide comprehensive plan required to comply with a regional plan?	Are neighborhood plans required to comply with the comprehensive plan?
New York City, NY	8,804,190 (2020)	472.43	29,302.37	X	X	✓	20-25 years	X	X
Greater London, U.K.	9,002,488 (2020)	607	14,770	<i>London Plan 2021</i>	2021	✓	N/A	X	✓
Vancouver, CA	631,486 (2016)	44.39	14,226	<i>The Vancouver Plan/Planning Vancouver Together</i> (in progress)	Projected June 2022	X	N/A	X	TBD
Los Angeles, CA	3,898,747 (2020)	501.55	8,304.22	<i>Los Angeles General Plan*</i>	2001	✓	N/A	X	✓
Chicago, IL	2,746,388 (2020)	234.53	12,059.84	<i>We Will Chicago</i> (in progress)	Projected 2023	X	N/A	X	TBD
Philadelphia, PA	1,603,797 (2020)	142.7	11,943.68	<i>Philadelphia 2035</i>	2010	✓	25 years	X	✓
Austin, TX	961,885 (2020)	326.51	3,006.36	<i>Imagine Austin</i>	2012	✓	30 years	X	✓
Seattle, WA	737,015 (2020)	142.07	8,775.03	<i>Seattle 2035</i>	2016	✓	20 years	✓	✓
Portland, OR	652,503 (2020)	144.98	4,890.59	<i>Portland 2035</i>	2020	✓	20 years	✓	✓
Memphis, TN	633,104 (2020)	304.62	2,100	<i>Memphis 3.0</i>	2019	✓	20 years	X	✓
Minneapolis, MN	429,954 (2020)	57.51	7,962.11	<i>Minneapolis 2040</i>	2020	✓	10 years	✓	✓

*See more information about LA's General Plan Elements, [OurLA](#), the comprehensive update to the City's General Plan, is currently on pause.

Sources

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APPENDIX B: IDEAS FOR FURTHER EXPLORATION

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Below are additional ideas for further consideration to move New York City towards a comprehensive planning framework.

Strengthen Community Capacity

- **Establish “Building New Land Use Leaders,” a youth land use engagement program designating non-voting member positions within all Community Boards.** Through guidance and support from the Civic Engagement Commission, appointees should participate in Community Board Committees to build planning skills and expertise. The goal of this program should be to increase the diversity of perspectives and representation of historically underrepresented groups in the planning process as well as raise awareness about land use issues among New York City’s youth population. This two-year program is intended for young adults ages 15-25 who would be encouraged to apply to a full-term Community Board position upon completion. The Civic Engagement Commission, alongside Borough Presidents, should identify mentors for these positions, including past Community Board members.

This youth program should be modeled off of [Seattle’s Get Engaged program](#), which places young adults (ages 18-29) interested in participating in city government on Seattle’s public boards and commissions for one-year terms. Similarly, Portland, Oregon sponsors one [Youth Position on the Planning and Sustainability Commission](#) for a two-year term in order to increase diversity and gain new perspectives on the future of the city.

- **Expand the current participatory budgeting process citywide** by increasing the [Civic Engagement Commission’s](#) involvement to continue building trust in the budget and engagement process.

Prioritize Equitable Distribution of Development

- **Continue allocating funding for community ownership models** such as Community Land Trusts on public land to promote community wealth building as well as combat residential displacement and real estate speculation.³³

What is a Community Land Trust (CLT)? A CLT is a non-profit, community-based organization that owns land and enters long-term ground leases with building owners to ensure permanent housing. The City Council awarded \$1.5 million for Fiscal Year 2022 to support CLT organizing across the City.³⁴

- **Provide funding to create an Emergency Basement Apartment Conversion Task Force** to offer recommendations on legalizing safe and affordable basement apartments throughout New York City. Utilizing the data and findings from RPA’s report [Be My Neighbor: Untapped Housing Solutions ADUs and Conversions](#), this interagency Task Force should provide lessons learned from the East New York Basement Apartment Conversion Pilot Program and coordinate with State agencies and elected officials to **develop an equitable, streamlined process for sustainable conversions, offer financial assistance, and provide technical support for retrofitting basement apartments.** The Task Force should also provide specific recommendations on the feasibility of safe basement conversions in areas of the City that are highly vulnerable

to sea level rise and extreme rainfall. The recommendations should be incorporated in a future comprehensive plan given the interrelated challenges of safe and affordable housing, and climate change-related increases in extreme weather events.

→ **Strengthen coordination between City agencies, specifically HPD, New York State agencies, and elected officials to plan and implement the Housing Our Neighbors with Dignity Act**, which enables the New York State Housing Trust Fund Corporation to finance and facilitate the acquisition of financially distressed hotel and vacant commercial office properties for affordable or supportive housing.

→ **Proposed Mayoral Growth Management Task Force (cont'd):** The next mayoral administration should establish a Mayoral Growth Management Task Force to evaluate how certain growth management mechanisms should be utilized to promote sound planning and equitable growth.

The Task Force should:

- Seek community input on how growth and new developments typically affects existing residents, whether the City should implement certain growth management policies and why, and how growth management policies could improve livability standards. Based on the community input gathered, the Task Force should develop a set of guiding principles concerning why, how, and when growth management tools should or should not be utilized in New York City.

Vancouver, Canada has a set of guiding principles for development contributions, such as maintaining community livability as the city grows, calling for certain new developments to contribute to the cost of growth, and upholding transparency and flexibility in the system.

- Evaluate and compare how temporary land use moratoria, growth-capping laws, and other growth management methods are structured in other cities.

Vancouver's community amenity contributions are in-kind or cash contributions provided by property developers when the city grants development rights through a rezoning that go toward building affordable housing, parks, and community facilities.³⁵

- Analyze the feasibility of whether and how different land use moratoria and growth management options could be structured in New York City based on the evaluation of other cities' methods.
- Study how land value recapture mechanisms can be utilized in New York City to generate public value to further equitable development and decrease real estate speculation. Land value recapture mechanisms obtain community benefits from increases in private land value due to land use changes, infrastructure investments, or development projects.³⁶

An example of a value recapture mechanism for a specific area is outlined in Pratt Center for Community Development's 2019 report Public Action, Public Value and 2020 report Our Hidden Treasure, which recommended that "the City study the feasibility of selling NYCHA's development rights to surrounding parcels within the Gowanus rezoning area, generating resources for a NYCHA Gowanus Improvement fund that would be required to be reinvested directly into Gowanus Houses, Wyckoff Gardens and Warren Street."³⁷

- Evaluate how a development impact fee program could be structured to generate funding for development mitigation, in addition to the challenges associated with this type of program, as explored in New York University Guarini Center's report Reforming CEQR: Improving Mitigation under the City Environmental Quality Review Process. Impact fees are typically one-time payments by a developer to a local government to mitigate certain development impacts on public services and infrastructure.
- Assess how different growth management mechanisms can work effectively with current ULURP, CEQR, and SEQRA processes or whether the mechanisms should stand alone.
- Analyze the constitutionality of various growth management options, especially concerning Fifth Amendment takings and exactions, as well as state tax law ramifications.³⁸
- Develop a set of recommendations outlining how New York City can use growth management strategies in tandem with a comprehensive planning framework to grow equitably.

ENDNOTES

ENDNOTES

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- 19 "As a City of Reconciliation, the City of Vancouver has committed to 'form a sustained relationship of mutual respect and understanding with local First Nations and the urban Indigenous community.' This is an ongoing and evolving commitment, and one that is foundational to the long-term success of the Vancouver Plan." City of Vancouver, *Phase 1 "Listen and Learn" Engagement Summary Report*, Vancouver Plan Engagement Process (November 2019–August 2020): 2, <https://vancouverplan.ca/wp-content/uploads/PDS-Vancouver-Plan-Phase-1-Report-Appendix-A-RTS-13988.pdf>.
- 20 For example, Bronx Community Board 11 (Morris Park area) is 64% white despite the neighborhood being 22% white. Queens Community Board 7 (Flushing area) is 41% white while only 26% of the neighborhood is white. Rachel Holliday Smith and Ann Choi, "You're your Community Board Reflect You and Your Neighbors? Find Out," *The City*, January 29, 2020, <https://www.thecity.nyc/government/2020/1/29/21210566/does-your-community-board-reflect-you-and-your-neighbors-find-out>.
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26 Although the NYC Department of Small Business Services is mandated by Local Law 152 of 2019 to produce a storefront business assessment every three years, the law only requires an assessment of at least 20 community districts in the city. New York City Local Law 152 of 2019, accessed September 1, 2021, <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3557680&GUID=8828C697-B7CB-491A-BA8B-B24CB7C931C4&Options=ID|Text|&Search=storefront+business+assessment>.

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28 Zeanah, “Reconsidering the Role of Consistency,” 1-8.

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30 *Inclusive City: Strategies to Achieve More Equitable and Predictable Land Use in New York City* (January 2018): 11, <https://www1.nyc.gov/assets/charter/downloads/pdf/public-comments/may/may7-segal-a.pdf>.

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analyzed in an EIS under existing law.²⁰⁸ There is no New York State statute that explicitly authorizes the imposition of impact fees for the consequences of development... Further research would be necessary into whether such fees in general, or fees for particular impacts identified through the CEQR process, would be preempted by state legislation.” Adalene Minelli, *Reforming CEQR: Improving Mitigation under the City Environmental Quality Review Process*, (February 2020): 38, <https://guarinicenter.org/reforming-ceqr/>.

