



To: Office of Long-Term Planning and Sustainability

From: The NY Metro Chapter of the American Planning Association:
Diversity Committee

Date: March 30, 2007

Re: PlaNYC 2030 – Comments

The Diversity Committee of the Metro Chapter of the American Planning Association has reviewed PlaNYC 2030 and its members have attended various public information events held by your office. We have the following comments on the Plan and the process within which it has been developed.

1. **Diversity**. The Plan is silent on one of the most important qualities of life in New York City: diversity. The Plan should be revised to include 'Promote Diversity' as a separate, stand-alone goal. This includes economic, racial-ethnic, cultural and linguistic diversity, and diversity of sexual orientation. The City's diversity cannot be taken for granted and must be supported in order to balance against the tendencies of the real estate market to exclude lower-income people from whole neighborhoods. The goal of promoting diversity would inform strategies to achieve all the other goals of the plan.
2. **Citizen Participation**. Citizens' opportunities for participation in the Plan have been limited to such an extent that the entire participation process is unacceptable. The forms of participation offered can be categorized as "manipulation, therapy, informing, consultation, and placation," all of which are at the bottom of Sherry Arnstein's 'Ladder of Citizen Participation,' a classic in the literature of city planning theory. These forms are described more generally by Arnstein as "Nonparticipation" and "Tokenism." But further, it's not worthwhile to participate just for the sake of participating. Citizens should have the ability to influence decisions through our hard-won democratic process, embodied in the decision-making entities of the City Planning Commission and the City Council.
 - The City made little effort to widely inform citizens about the Plan. For instance, there were no transit advertisements (subway, bus, etc.) describing the Plan or opportunities to participate in commenting on the Plan.
 - Committee members have observed no brochures for the Plan in languages other than English. The outreach and public comment process has been

overly dependent on internet media, which limits participation to those New Yorkers with regular access to the internet.

- The Plan should provide an estimate of the number of people who have participated in a public event held by the Office and the number of people who have commented on the plan, and via what media.
 - PlaNYC could have approached higher levels of citizen participation by advertising to the general public through transit ads and by designing a meaningful citizen survey on the issues the Plan seeks to address.
3. **Background information.** PlaNYC 2030 lacks a publicly available assessment of existing conditions as they relate to the issues the Plan seeks to address. Such an approach exposes the City to greater risk of error in the assessment process, and reduces opportunities for meaningful citizen participation, since important knowledge on the issues has been withheld. This lack of public information means there is no way individuals and civil society can verify the statistics and ideas presented by the Plan.
4. **Housing.** The Plan does not sufficiently address the complex problems of affordable housing and the resegregation that is occurring throughout the City, where lower income people are forced to the edge of the City and into neighboring communities in the metropolitan area.
- The Plan should provide a detailed socioeconomic and geographic analysis of households paying more than 50 percent of their income for housing. Since housing costs are related to the relationship between the location of housing and employment centers, the cost of commuting to and from work should be included in this analysis.
 - Focus on housing should include consideration of location near transit to reduce commuting costs and produce energy savings.
 - The plan aims to make housing more affordable. This is unacceptably vague. Affordable for whom? The Plan needs to address the needs of different income groups. Loss of affordable units should be included in the analyses that should inform the Plan. The one million housing units to be produced through implementation of the Plan should be compared to the number of units needed to satisfy the demand.
 - The Plan also aims to make housing more sustainable. Does the Plan envision low-income households living in green buildings? Many low-rent apartments have poor indoor air quality, which is both a green building issue and a public health concern, especially with the high rate of childhood asthma in certain neighborhoods in the City.

- The Plan should provide ways for citizens of all income levels to implement green-friendly strategies for energy use; as it stands, the Plan depends on expensive new construction as a primary way to achieve sustainability.

The Committee has other general concerns with the plan, including the Plan's lack of background information for the proposed 30% reduction of carbon emissions; the lack of reference to and coordination with recent and proposed rezonings; and the lack of reference to the City's own planning documents, including the Ten Year Capital Strategy or other capital plans, and other city plans. Integration with these planning and budget processes, through the auspices of the City Planning Commission and the City Council, would help ensure that PlaNYC does not end up as another plan on the shelf. The Committee is also concerned with the lack of attention to emergency management and adaptation to the risks associated with sea level increase due to climate change, considering the City's risk of inundation due to severe storm or hurricane. Many experts agree that New York City is one of a handful of cities facing significant hurricane risk; it would be inexcusable to fail to learn from the example of New Orleans. Finally, the Committee believes that a more effective plan for sustainability would explicitly involve coordination with the municipalities, counties and states of the metropolitan region.