Making the Most out of

Racial Equity Reports

A Progress Report on New York City's Efforts to Measure Displacement in Land Use Decisions

Spring 2025

PRATT CENTER FOR COMMUNITY DEVELOPMENT

Pratt GCPE

RISC
REZONINGS ARE ABOUT RACE
RACIAL IMPACT STUDY COALITION

Executive Summary

Background

In 2021, New York City passed Local Law 78, historic legislation in response to growing displacement caused by land use actions. The legislation required the creation of the Equitable Development Data Explorer (EDDE), a data tool that provides community members and decision-makers with neighborhood-level demographic information to better understand area needs. It also created a displacement risk map that assesses the risk of displacement throughout the City based on recent relevant data.

Specific land use applications trigger a requirement that applicants (public and private) create and submit a Racial Equity Report (RER). This legislation resulted from years of advocacy by the Racial Impact Study Coalition (RISC), a partnership of various community-based and planning groups that organize around ending racialized displacement and promoting the development of permanently affordable housing.

Purpose and Methods

This report is a snapshot—a look into where things stand four years after the legislation's passage. How are community boards, elected officials, and other stakeholders using the RERs? How can the data tool and RERs be strengthened to ensure they are effective tools for community planning?

To explore these questions, Pratt's Graduate Urban and Community Planning program, with support from RISC and Pratt Center for Community Development, analyzed RERs submitted between June 2022 and August 2024 and conducted interviews with community board members and elected official staff over the past year to understand how these tools were being used as they evaluated proposed land use actions in their communities.

Key Findings

An analysis of projects requiring RERs revealed that proposed land use actions vary across the boroughs in concentration of housing units, affordability of housing, and siting of projects in areas considered at risk for displacement.

- 56% of the proposed units are located in The Bronx;
- Less than 30% of the proposed units in The Bronx are classified as affordable;
- Over half of the proposed projects in Brooklyn are in areas with high or highest displacement risk.

The interviews and researchers' experiences revealed challenges in using the data tools for evaluating land use decisions.

- No formal training has been provided on how to use EDDE or RERs, making it difficult for community board members to understand the tools;
- RERs are not being presented by applicants or Department of City Planning (DCP) staff to community boards and other stakeholders, discouraging discussion of the report findings;
- Data updates are not frequent enough, limiting the functionality of the EDDE and restricting analysis and access to the most current data.

Recommendations

To ensure the RER and EDDE are promoted as useful tools that are important in evaluating proposed land use actions, Pratt Center and RISC recommend:

- DCP, in partnership with the Civic Engagement Commission, should incorporate training on the EDDE and RERs into annual land use training for community boards and make it available to elected officials, government staff and the public;
- DCP should require RERs to be presented to in-depth community boards, elected officials, and the City Planning Commission by applicants or City staff to ensure broader discussion. Expanding these presentations can ensure racial equity considerations are meaningfully addressed in the land use process;
- DCP and the Department of Housing Preservation and Development should improve EDDE functionality to allow users to generate data that better fits their needs.

Recommendations

Based on our review, while Local Law 78 is an important step to ensure racial equity is factored into land use decisions, there are opportunities to revisit how the legislation is implemented to make it a more effective community planning tool. Improving accessibility, encouraging broader use, and making adjustments to the data sources can make the Equitable Development Data Explorer and Racial Equity Reports stronger tools to democratize community planning.

1. Adjust data sources and perform more frequent updates

- New York City Department of Housing Preservation & Development (HPD) and Department of City Planning (DCP) should use data sources that present race and income data on a census tract level or Neighborhood Tabulation Area (NTA)-level to allow for a more detailed analysis of a proposed project's impacts on the immediate surrounding area.[19]

- HPD and DCP should adopt a more flexible approach to data updates and perform more throughout the year, consistent with all data sources within the EDDE. Only updating once a year, instead of when individual data sources update, defeats one of the major advantages of an online, interactive tool over a static report: access to the most current data.

2. Expand outreach and training opportunities for community boards and other stakeholders

As of the time of this report, DCP is in the process of developing training on the EDDE and RERs for Fall 2025, when new community board member terms begin. Additional recommendations for training and outreach include:

- HPD and DCP should provide annual refresher training to community boards, even if they received initial training on these tools.

- Borough president-level land use staff should be available to advise and provide technical assistance to community boards as they use RERs.

- Elected officials and their staff should facilitate training within their communities. RISC's *Stories + Data = Power* poster guide is a valuable training tool that has been translated into Spanish, but more language translations and distributions would be needed for broader outreach and training.

- The Civic Engagement Commission should facilitate training to the broader public in collaboration with HPD and DCP.

- In collaboration with the Fund for the City of New York's Community Planning Fellow program, students enrolled in urban planning programs should be trained on RERs so they can assist boards in their use.

- Training should be designed to include uses outside of land use decision-making. The data within the EDDE can be used for other purposes such as informing Community District Needs,[20] more comprehensive neighborhood-level planning, and providing information relevant to other community-based groups.

3. Improve usage and functionality of reports

- DCP should require applicants to present the contents of RERs at in-person community board meetings, which would assist in normalizing the reports as part of the land use process. The reports should also be presented to the City Planning Commission (CPC) during the public review session where the application is certified and/or the hearing for the proposed land use action.

- HPD and DCP should improve the EDDE by allowing users to generate data for more than one race or geographic location at a time.

- HPD and DCP should allow users to select which data they would like to download from the EDDE into a report.

- City Council members and borough presidents should make it clear to all land use applicants that they will not support any project for which the applicant does not provide a required RER and present RER content to them or their staff and the affected community boards.[21]

Case Study
A Bronx Racial Equity Report

The purpose of this case study is to break down the various sections and contents of an actual Racial Equity Report (RER) to demonstrate how community boards and other stakeholders can most effectively use the reports in their decision-making. This RER is from a rezoning that went through ULURP in 2023.

1460-1480 Sheridan Boulevard Rezoning

Project Overview

The applicants [Westfarms Realty LLC and 1480 Sheridan Realty LLC] are seeking various actions including waterfront authorizations for the development of a mixed-use project consisting of three buildings which would create approximately 21,000 square feet of commercial space, accessory parking, open space with waterfront access, and 970 residential units classified as affordable housing.

Why does the project need an RER?

The project requires an increase in the permitted residential floor area of at least 50,000 square feet.

Source: Project Renderings from CPC Pre-Hearing Session

This project is located within Community District 9, but very close to the border of Community District 3 (Case Study: Map 1). Community Board 9 considered this application. The data for the area surrounding the project site used in this report is Public Use Microdata Area (PUMA) 3705, which approximates Bronx Community Boards 3 and 6 (Case Study: Map 2).

Case Study: Map 1

Project Site and Surrounding Community Board Boundaries
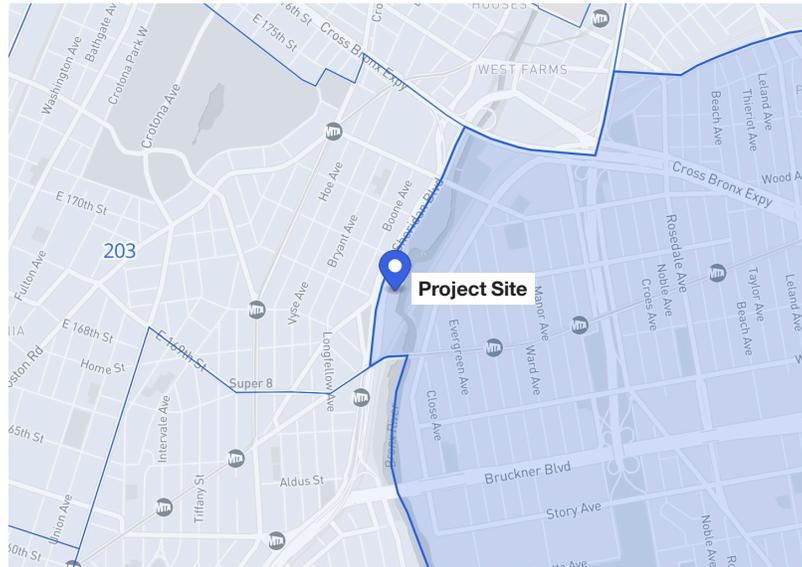
Source: Community Board Finder Map: https://boundaries.beta.nyc

Case Study: Map 2

Project Site and Surrounding Neighborhood Data Boundaries
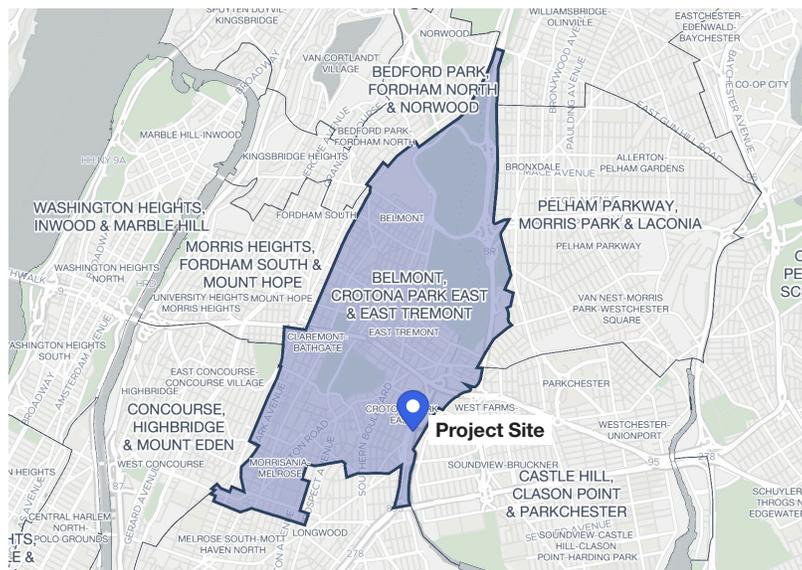
Source: Equitable Development Data Explorer

Residential Space and Housing Affordability

The project will have an approximate total of 970 units, which are all considered affordable at AMI levels ranging from 0% to 120% of AMI.[22]

The breakdown of the unit size of the development is not known. The applicant plans to build apartments ranging from 0-3 bedrooms.[23] The applicant is subject to Mandatory Inclusionary Housing requirements and has opted to map Options 1, 2, and 3 across the development site.[24] The RER includes income information on the area surrounding the project, which they obtain from EDDE.

Number of Units and Affordability Levels of Proposed Project

Source: 1460-1480 RER

Borough	Unit Cost	Percent of Development
Extremely Low Income (0%-30% AMI)	146	15%
Very Low Income (31%-50% AMI)	242	25%
Low Income (51%-80% AMI)	195	20%
Moderate Income	387	40%
Total	970	100%

Household Income of Neighborhood Surrounding Project Site

Source: American Community Survey 2015-2019; Community Profile Table 2.03

Household Income of Neighborhood Surrounding Project Site. Share of Households by income category.

Legend: Belmont, Crotona Park East & East Tremont | Bronx | NYC

- Extremely low-income (0-30% AMI): 48%, 36%, 23%
- Very low-income (31-50% AMI): 18%, 17%, 23%
- Low-income (51-80% AMI): 17%, 19%, 15%
- Moderate-income (81-120% AMI): 10%, 14%, 16%
- Middle-income (121-165% AMI): 4%, 8%, 12%
- High-income (166% or higher AMI): 3%, 7%, 21%
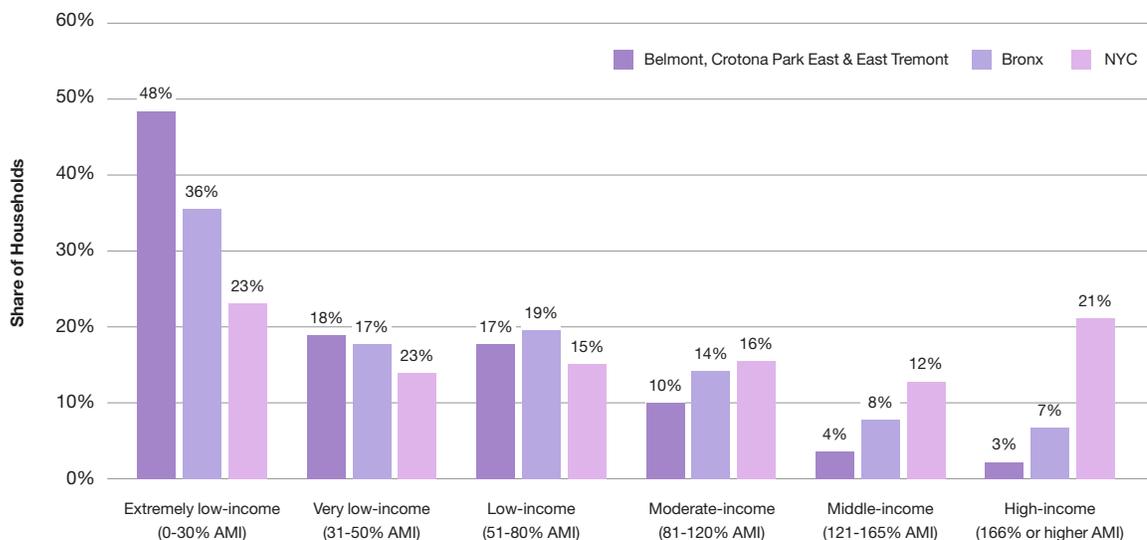
There is a large population of households in the surrounding area that are extremely low-income; a majority of the surrounding area earns less than 80% AMI. While this project will have units for lower-income households, 40% of these units will be for households earning more than 80% AMI while presently, only 10% of the population earns over 80% AMI.

Non-Residential Space and Jobs

The project plans to have approximately 21,229 square feet of non-residential space and 20,000 square feet of parking. These uses will result in jobs, which could contribute to the economic vitality of the area. After construction, the applicant anticipates several jobs as a result of the development due to the commercial space and parking lot, in addition to workers to service the residential building.[25]

In the RER, the applicant provided the median household income for the surrounding area obtained from the EDDE.[26]

Case Study: Table 2

## Anticipated Jobs for Non-Residential Space with Known Tenants

Source: 1460-1480 RER, EDDE, and Racial Equity Report Submission Guide - May 28, 2024

| Sector	Job Count	Median Annual Wage for Sector
Construction	615[27]	$45,506
Food and Beverage Stores	64	$24,328
Residential Uses	39	$26,974
Parking	2	$26,974
Total Job Count	105	

Case Study: Chart 2

Estimated Median Household Income 2017 – 2021

Source: American Community Survey 2015-2019; Community Profile Table 2.02

Chart 2: Estimated Median Household Income 2017–2021 (Annual Household Income)
- Belmont, Crotona Park East, & East Tremont: $29,705
- Bronx: $43,182
- NYC: $70,643
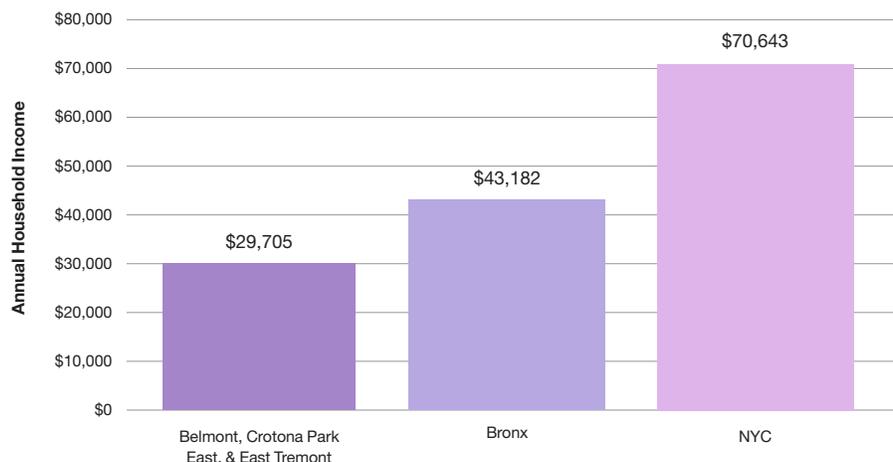
Labor Force Participation 2017 - 2021

Share of Population Aged 16-64

- 63% — Belmont, Crotona Park East, & East Tremont
- 68% — Bronx
- 73% — NYC
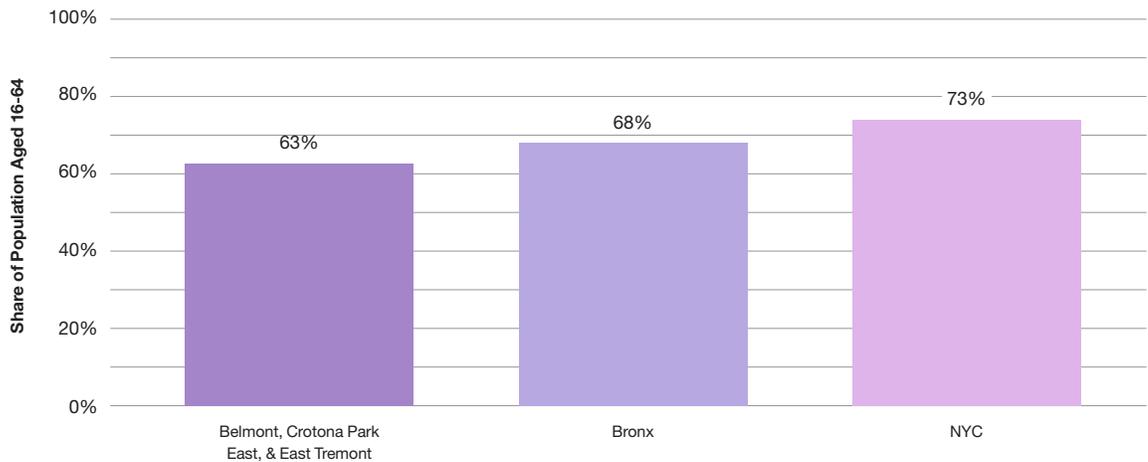
The labor force participation rate, which shows the share of the total population aged 16-64 who is employed or seeking work for the surrounding area, is 68%, which is lower than the rate for New York City. Construction jobs, though temporary, could introduce more employment opportunities for the neighborhood.

According to Chart 2, the median household income for New York City is $70,642, which means construction jobs, if made available to local residents, would only have them earning 59% of AMI.

Using ACS data from the census, the RER shows the median annual wage for jobs in the food and beverage sector is $24,238.[28]

This information helps prompt questions about how many of the jobs pay a living wage and how many could be accessible to the community through local hiring and training efforts.

This information supports further discussion about how the jobs will contribute to the area's economic vitality by offering living wages.

Case Study: Map 3

Displacement Risk Map for Surrounding Project Site

Source: 1460-1480 RER

Displacement Risk Map
- Highest
- Higher
- Intermediate
- Lower
- Lowest

Belmont

Claremont
Bathgate

East
Tremont

Crotona
Park East

Morrisania
Melrose

Project Site
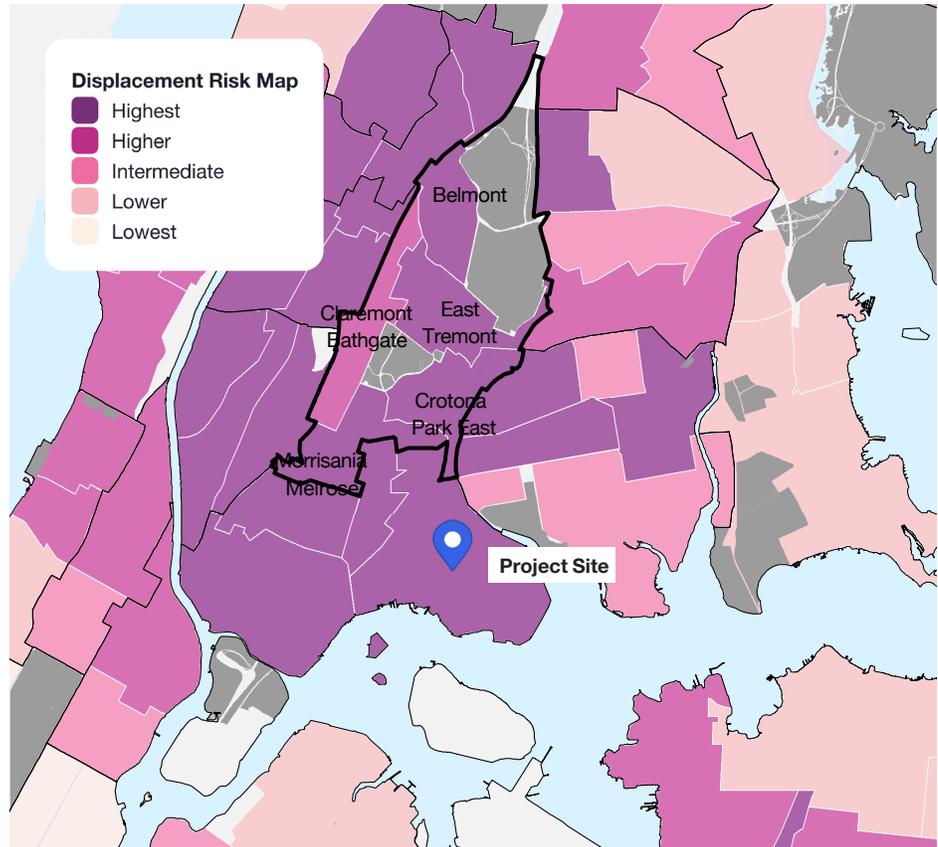
Case Study: Chart 4

High Rates of Rent-Burden

Source: American Community
Survey 2015-2019; Community
Profile Table 3.04

Share of Households

- 64%
- 61%
- 53%
- 39%
- 35%
- 28%

70%
60%
50%
40%
30%
20%
10%
0%

Rent-Burdened
(More than 30% of income spent on rent)

Severely Rent-Burdened
(More than 50% of income spent on rent)
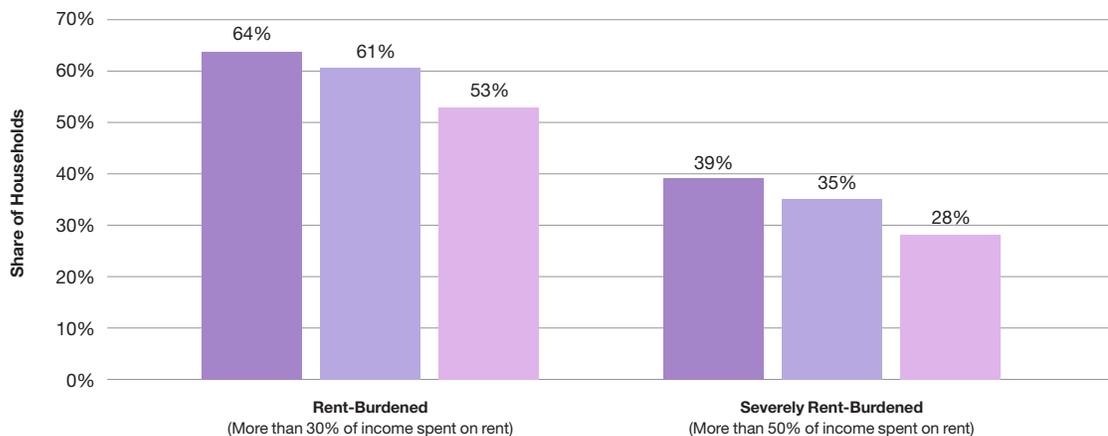
Pulling data from the EDDE, the RER shows that many households in the area are rent-burdened and severely rent-burdened.

How does this project further fair housing?
In the RERs, there is a section where the applicant must write "a narrative statement of how the proposed project relates to the goals and strategies to affirmatively further fair housing and promote equitable access to opportunity identified within the City's fair housing plan."[29]

New York City's Fair Housing Plan, Where We Live NYC, outlines the goals of the plan to affirmatively further fair housing. The goals include:

1. Fight housing discrimination in its many different forms;
2. Build more housing in all neighborhoods, including the suburbs;
3. Protect existing affordable housing and prevent displacement;
4. Ensure access to different types of neighborhoods for tenants using housing vouchers;
5. Expand and improve housing options and accommodations for people with disabilities;
6. Invest in neighborhoods that haven't gotten their fair share.

The applicant asserts in the RER that the development supports Goals 2, 5, and 6 of Where We Live NYC.

The applicant states Goal 2 (Build more housing in all neighborhoods, including the suburbs) produces more affordable housing in an area accessible by subway and bus. The applicant states that Goal 5 (Expand and improve housing options and accommodations for people with disabilities) as their development will include ADA-compliant uses, though they do not specify how many of these units will be built. The applicant states their development meets Goal 6 (Invest in neighborhoods that haven't gotten their fair share), by creating jobs, open space, and public access to the Bronx River waterfront.

> In combination with the project's affordability levels and its area designated at a high risk of displacement, this information helps assess the project's potential impact on the existing population.

> The narrative can serve as a starting point for questions on how the project may align with the plan's goals and opportunities to deepen its impact.

Conclusion

Community members and advocacy groups have long mobilized against displacement caused by land use decisions through organizing, advocacy, and public testimony. Local Law 78 created tools and access to data sources that can help communities gain a deeper understanding of how proposed land use actions may impact resident displacement.

Improving the functionality of the EDDE and RERs, along with expanding training and support for using their data is key to fully integrating these tools into the land use review process. As this law enters its fourth year, we must strengthen its implementation and ensure it advances equitable, community-based planning.
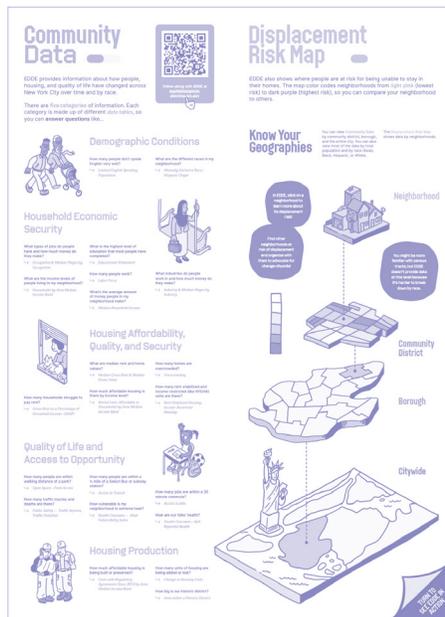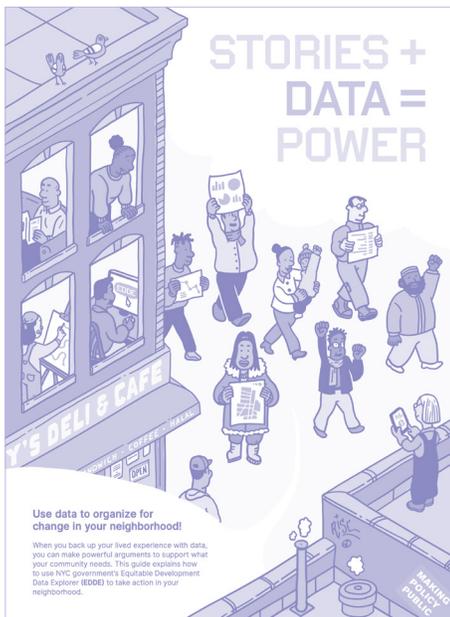
Stories + Data = Power, a guide created in collaboration with Center for Urban Pedagogy to help New Yorkers organize for neighborhood change using the Equitable Development Data Explorer (EDDE).

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60 years of

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