

TESTIMONY

The New York City Council Committee on Land Use

Rafael Salamanca, Chair
Monday, January 11, 2021
Remote Hearing
(Virtual Room 2)

Note: This testimony reflects
the position of Pratt Center for
Community Development and not
Pratt Institute.

Intro. 1572-A Re: Racial Disparity Reports

I am Paula Crespo, Senior Planner at the Pratt Center for Community Development, and I appreciate the opportunity to testify in support of Intro 1572-A, requiring neighborhood Racial Disparity Reports alongside certain zoning actions.

In partnership with many communities of color throughout the city, as an active member of the Racial Impact Study Coalition, and through our technical assistance practice and research, we have repeatedly pointed out the need for intentionally prepared and publicly accessible information that looks explicitly at the racial and ethnic impacts of all planning and policy decisions. The devastating impacts of our sky-rocketing and long-unaddressed levels of racial segregation and socioeconomic disparity have never been more obvious than as we grapple with the effects of COVID-19. In land use, the need to examine racial impacts is made clear by the woefully inadequate current system of environmental review, a point which we detail in our extensive explorations of the measures of indirect residential and commercial displacement risk, "[Flawed Findings Part 1](#)" and "[Flawed Findings Part 2](#)."

In these reports, we point to the need for planning and policy processes – before and after zoning actions – to aim squarely for equitable outcomes and to create multiple reinforcing mechanisms to evaluate progress and course correct. **Racial Disparity Reports are an essential and important complement to Equitable Comprehensive Planning and Reform of the CEQR Technical Manual.**

Importantly, 1572-A goes beyond a siloed approach to understanding racial impacts by requiring the collection and presentation of information that provides important neighborhood context. By looking at historic trends in the neighborhood, including a neighborhood-wide study area, and considering the cumulative impact of changes that affect residential and commercial activity, the Racial Disparity Reports that it will generate will be a critical tool for community members, Council Members, and the public to better understand the people and places that a land use application may affect.

As we consider the ways that the Racial Disparity Reports can have the greatest impact, there are some additional measures that can strengthen the reports as well as the process for making it available to the public. For example, when considering the impacts of commercial use changes, it will be important not just to evaluate the average wages and number of the jobs potentially created, but also to look at the average wages and demographics of workers in sectors of use before the proposed action. Additionally, designing for community input into the questions examined in the reports would yield relevant information that might otherwise be missed, as well as facilitate ways for the public to engage in understanding the questions at hand before the report is published.

In short, we look forward to working with you closely to further strengthen and advance the bill, and as part of the Racial Impact Study Coalition we will be submitting more detailed comments. Thank you to the Public Advocate Jumaane Williams, Chair Salamanca, and all the other Council sponsors for their leadership in developing and proposing this Intro.

Links to relevant Pratt Center reports: "[Public Action, Public Value](#)" details how the current system of public action and investment misses the mark in advancing equity within neighborhoods. Building on "Public Action, Public Value", "[Our Hidden Treasure](#)" details what is lost by untempered speculation, ill-considered zoning changes divorced from planning, and privatization of public land.

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