



**Response to the Bloomberg Administration's
PlaNYC 2030
Long Term Sustainability Planning Process and Proposed Goals**

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NY Metro Chapter of the American Planning Association
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New York Metro APA

The New York Metro Chapter of the American Planning Association (NY Metro APA) represents more than 1,200 planners, designers, engineers and others involved in planning for the region's communities. Our members work in the private sector, in nonprofit organizations and in government agencies to address planning issues affecting the physical, social and economic environment of the metropolitan region (New York City, Long Island and the Hudson Valley). We are part of the American Planning Association whose 41,000 members are dedicated to creating livable communities of lasting value.

The NY Metro APA Chapter is particularly committed to promoting planning-related public education, encouraging broad participation in planning decisions, and collaborating with other organizations to advocate the highest standards of the profession.

Our membership is representative of a diversity of interests and perspectives (indeed, some have worked on aspects of PlaNYC 2030). Therefore, this document is not an attempt to express the ideas, opinions or views of every NY Metro APA member. It does express our collective and individual interest in contributing to PlaNYC 2030 in order to promote public involvement, to cast light on the values and assumptions underlying the process, and to highlight important planning alternatives.

PlaNYC 2030

New York Mayor Michael Bloomberg recently announced the creation of a new Office of Long-Term Planning and Sustainability in the Mayor's Office of Operations, and formation of a broadly representative Sustainability Advisory Board. He asked them to address the challenges of population growth, aging infrastructure and high-priority environmental risks by formulating a plan for maintaining and improving quality of life in the City through the next quarter century. The result is PlaNYC 2030, which is focused on 10 preliminary sustainability goals.

NY Metro APA strongly supports the stated objective of PlaNYC 2030: long-term development planning for a city that will be "cleaner, healthier and more sustainable." New York is joining a long list of cities, regions and nations responding to the call issued by the United Nations and many other organizations to plan for sustainable development to "meet the needs of the present without compromising the ability of future generations to meet their own needs."

Below we offer general comments on the PlaNYC 2030 process followed by selected comments on the 10 preliminary goals identified by the Administration.

Our general comments are made in connection with three interrelated observations:

- Public participation and accountability. The term "sustainable development" has many different definitions and may be interpreted in a variety of ways depending on one's perspective, values or priorities. Therefore, credibility of the process and the plans depend on broad, open public involvement and accountability.
- Underlying assumptions. Differing sets of assumptions about future population trends, technological developments and other factors may lead to widely varying strategies to achieve "sustainable development." Planning for a long time horizon tends to magnify the importance of

underlying trend assumptions. Therefore, it is important to consider alternative assumptions and scenarios when searching for the most effective strategies to achieve agreed-upon sustainability goals.

- Global lessons and the regional context. The sustainable development planning that has been occurring in the world's other mega-cities offers New York many valuable lessons. We should be searching the globe for the best solutions to challenges that are similar to our own, educating New Yorkers about them, and adapting them to our regional context. We can, and should, study how congestion-pricing works in London; how the Hong Kong subway system pays for itself by capturing increased property values around its stations; and how Singapore has provided its citizens with universally affordable modern housing. Across all sustainability issues New York should "think globally, and act regionally."

General Comments on the PlaNYC 2030 Process

In order to improve the likelihood of achieving the Mayor's stated objectives, NY Metro APA offers the following general recommendations regarding the PlaNYC 2030 process:

1. Increase transparency. The PlaNYC 2030 process and the deliberations leading to development of its goals and strategies should be as open, transparent and inclusive as is practical to promote broad ownership of the goals, and to avoid the erosion of credibility that tends to occur when deliberations occur out of public view.

We respect the work done by the new unit located in the Mayor's Office of Operations, but responsibility for the next phase of agenda setting and implementation must be accomplished by an agency or entity that is more transparent in its procedures and deliberations, broadly representative, and accountable to the general public. Wide-ranging plans need consensus by a broad constituency over an extended period of time. Increased transparency will enable more stakeholders and advocates to understand the shared interests we all have in achieving greater sustainability.

2. Extend outreach. Particular attention should be given to seeking input from those least likely to have been reached by the extensive outreach to-date such as language minorities that reflect the diversity of New York, low income residents, and those without ready access to the internet-based feedback mechanisms.
3. Continue to educate. The City should continue its commendable initiative to provide education regarding environmental and development issues for the non-expert stakeholders who need information to participate in planning in a meaningful way; use multi-lingual materials, multiple information channels and open deliberations.
4. Maximize accountability. Neither the PlaNYC 2030 process nor urgency surrounding achievement of its goals should be used as an excuse to circumvent open decision-making by elected officials or local legislative bodies, or appropriate application of the City's Charter-mandated public review processes such as the Uniform Land Use Review Procedure.
5. Initiate monitoring. In order to extend accountability for achieving the goals of PlaNYC 2030 beyond the current mayoral term of office, the plan should incorporate publicly-reported progress monitoring, using objective criteria developed with broad input. The Administration and City Council should be highlighting the extent to which proposed actions and budget decisions would contribute to achieving consensus sustainability goals.
6. Consider multiple trend scenarios. PlaNYC 2030 should incorporate several trend scenarios for the region, rather than just one fixed assumption regarding, for example, the city's future population growth or energy needs.

It is essential that the City spell out its assumptions in greater detail, e.g., is population growth linear or cyclical? What income, age, and ethnic groups are likely to grow rapidly, in what time frames, and what are the implications of these varying trends? To what extent might future energy needs be reduced by conservation strategies or new technologies?

7. Identify limits. The process should highlight actual or potential limits to growth, particularly those related to land use, zoning, budget constraints and other public -policy-driven limitations.
8. Plan regionally. All sustainability challenges must be articulated in a regional context and all sustainability goals must be pursued through regionally coordinated action.

We believe that there are existing intergovernmental regional working groups and planning forums with broad stakeholder involvement that are already addressing each of the 10 preliminary sustainability goals of PlaNYC 2030. New York City should increase its own participation in and support for such groups, publicize their work and encourage even higher levels of stakeholder participation in their activities.

The City should look to these existing regional planning forums for leadership and innovation, drawing on their depth of knowledge and experience, their established relationships with public and private stakeholders, and the lessons they have already learned regarding the challenges of regional collaboration. They have already formulated sustainable development plans and strategies, and have the capacity to continue formulating such regional plans. By increasing public and governmental support and funding for their work and their recommended strategies, we can achieve rapid and significant progress toward sustainable development goals.

9. Incorporate “best practices” and new technology. With respect to each goal of PlaNYC 2030, the Administration should search out the best sustainability practices and technologies world-wide and where appropriate, adapt them to our regional context. The planning process and preliminary planning goals should be flexible enough to incorporate these “best practices” and new technologies. Planning should occur with the knowledge that the rapid advances occurring in energy, transportation, biotechnology, computer science and other fields will offer numerous potential contributions to sustainability, and may lead us to rethink our infrastructure investment priorities.
10. Highlight choices and trade-offs. We urge the Mayor to move the PlaNYC 2030 process toward discussion of the choices and trade-offs inherent in the stated goals, along with achievement of consensus around the highest priorities. Although PlaNYC 2030 addresses a range of extremely important planning issues, achievement of its goals will require public funding and implementation of a coordinated agenda of policies and actions. If all priorities appear to have equal weight the output will be a worthwhile vision, but not a plan.

Comments on the Specific Preliminary Goals of PlaNYC 2030

In December 2006 the Mayor announced a list of 10 goals for PlaNYC 2030. We acknowledge that there is a tension between the desire (expressed by planners and stakeholders alike) to establish concrete and measurable sustainability goals early in the planning process, and the need for openness and flexibility. We agree that all of the preliminary goals represent important sustainability targets and a manageable range of issues, but urge the Administration to clearly articulate ground rules that emphasize the open and iterative nature of this long-term planning process.

Here we offer only selected comments and reactions to the 10 preliminary goals. We have not attempted to address every relevant planning issue – they should be addressed, along with the difficult choices and potential solutions that emerge, during the larger and longer-term planning process.

1. Create homes for almost a million more residents and improve affordability.

NY Metro APA agrees that concerted efforts on many fronts will be required to address housing affordability and availability and to prevent further tightening of the housing market. By its nature, housing presents highly localized and parochial issues. Therefore, strong leadership is needed to place public policy decisions that affect housing affordability in the appropriate regional, national and policy contexts. In order to promote long-term efficiencies, affordability analysis for new construction and preservation programs should consider utility and commuting costs, and should also be coordinated with planning for transportation, economic development, energy conservation, land use and zoning decisions. When planning for housing affordability, the Administration should also consider:

- incorporating a range of demographic trend scenarios with respect to population of the city and region, and consideration of changing household compositions and employment patterns;
- seeking additional funding from state and federal government sources;
- creating additional sites and housing development opportunities through rezoning, density bonuses, decking of transit lines, and reclamation of brownfields;
- encouraging “transit-oriented development” (at relatively high densities within walking distance of mass transit) to produce the maximum number of units on the limited remaining sites, and;
- promoting long-term affordability through incorporation of “green building” incentives and standards into the Building Code.

2. Improve travel times by adding transit capacity.

NY Metro APA supports the Regional Plan Association's analysis of the need to increase commuter rail connections from New Jersey and west of the Hudson; we support the development of an additional rail tunnel from New Jersey to Manhattan. We urge the City to actively consider implementation of innovative strategies that have been researched by regional planning bodies such as:

- congestion-based pricing for private vehicles in the City's central business districts (Lower Manhattan, Midtown Manhattan, Downtown Brooklyn, and Flushing, Queens);
- density bonuses for developers in exchange for Transportation Demand Management programs that, for example, discourage development of accessory parking, and;
- the use of any funds raised by such schemes toward support for transportation infrastructure.

3. Ensure that all New Yorkers live within a 10-minute walk of a park.

We support increased access to parks and open space. However, the stated goal may not be the appropriate universal benchmark for allocation of resources toward this goal. The goal should be calibrated as appropriate to each neighborhood – the needs may differ depending on whether, for example, single family homes and backyards or apartment buildings predominate. Consideration should be given to a range of recreation, open space and green space amenities such as trees planted along public streets, public plazas, vest pocket parks, roof top gardens and larger public green spaces.

4. Develop critical back-up systems for our aging water network.

NY Metro APA supports continued investment in critical water infrastructure, along with aggressive pursuit of every opportunity for increased cost effectiveness through application of new technology and pollution prevention strategies.

5. Reach a full “state of good repair” on roads, subways and rails.

NY Metro APA supports active consideration of congestion-based pricing, market-rate pricing of on-street parking, and residential parking permit charges in support of transportation infrastructure repair. Implementation of these schemes could be supported by the establishment of Transportation Management Districts throughout the City, with funds generated locally to be dedicated primarily to improvement of transportation infrastructure serving that area.

6. Provide cleaner, more reliable power by upgrading energy infrastructure.

NY Metro APA anticipates that major innovations will occur in the energy sector within the PlaNYC 2030 timeframe. We are encouraged by the fact that Mayor Bloomberg made his first major public announcement regarding PlaNYC 2030 while touring a California plant that manufactures hydrogen fuel cells – one of several technologies that hold out promise as a source of clean distributed power.

Many organizations are generating ideas and new technologies that could conserve energy, create new-technology energy sector jobs and minimize the need for development of new energy infrastructure. The City should aggressively investigate and promote new technologies as they become practical, and promote energy conservation. Among the many recent recommendations:

- Promote NYC as a center of the high-performance building product market through investment, incentives for research and development, marketing campaigns, technical assistance, and development of energy-efficient public buildings.
- Develop training programs to create the skilled workforce to operate new-technology building systems.

7. Reduce global warming emissions by more than 30%.

NY Metro APA supports encouragement of non-motorized travel by broader use of “Complete Street” policies that provide non-motorized transportation users with safer travel routes, thereby reducing local greenhouse gas emissions and achieving a reduction in air pollution.

8. Achieve the cleanest air of any big city in America.

This laudable goal must be pursued in concert with progress toward other goals concerning reduced travel time and reduction of global warming emissions. It should incorporate specific goals for reduction of pollution-related pulmonary disease, and reduced emission of specific known pollution sources including diesel exhaust. New York City should devote additional resources to implementation of strategies recommended by regional planning organizations to promote achievement of these goals.

9. Clean up all contaminated land in the City.

NY Metro APA believes that New York City should pursue this goal, and that the City should use this process as a catalyst to promote the establishment of a national “Center of Excellence” in the rapidly-evolving environmental specialty of brownfields redevelopment. This Center should draw on the strong record of innovation by the City and other local governments, the State’s recently-enacted brownfields legislation, and the wealth of experience to be found among numerous universities, community and advocacy organizations, professional organizations and businesses throughout the northeast who are already working collaboratively to establish new standards for brownfields redevelopment.

10. Open 90% of waterways for recreation; reduce pollution and preserve natural areas.

NY Metro APA supports the goal of improving recreational access to local waterways through coordination of waterfront planning with efforts to reduce water pollution and preservation of natural waterfront areas.

Conclusion

The Bloomberg Administration is to be commended for its record of addressing New York's challenges and opportunities through coordinated planning, and for recognizing that the city, like the planet, is at a crossroads that requires decisive actions aimed at promoting responsible and sustainable growth, improving the quality of life, and avoidance of environmental crisis.

A successful long term planning process should draw on the exceptional strengths of New York and the region – already a case-study in “smart growth” and efficient, high-density development patterns – and should firmly establish New York as a model of innovative planning in the field of sustainable development.

The NY Metro Chapter of the American Planning Association offers these preliminary comments in support of the PlaNYC 2030 process, which should continue to be the subject of full and open discussion and debate with maximum feasible public participation and accountability. This worthy public initiative can become even better. We stand ready to work with all public agencies and stakeholders toward that goal.