

TESTIMONY of NEW YORK APPLESEED
THE NEW YORK CITY COUNCIL
COMMITTEE ON GOVERNMENTAL OPERATIONS
Hearing on Int. 2186
February 23, 2021

New York Appleseed (Appleseed), a nonprofit organization, hereby submits written testimony relating to Int. 2186, *A Local Law to amend the New York city charter, in relation to requiring a comprehensive long-term plan*. Appleseed is a member of the Thriving Communities Coalition and fully supports the coalition’s testimony submitted separately. Here we address the role of comprehensive planning in addressing racial and economic segregation in New York City and request amendments required for the bill to accomplish this purpose.

Appleseed’s mission is to advocate for integrated schools and communities. Over the last decade, Appleseed has studied the problem of racial and economic segregation in New York City and New York State and successfully advocated for policy reforms to address the issue.

Neighborhood segregation is a structural problem that affects the entire city and was created by centuries of racist governmental policies; it cannot be solved with piecemeal, place-based strategies. [The attached 2019 op-ed “NYC’s Segregation Was Carefully Planned. Its Integration Must Also Be”](#) written by our executive director David Tipson explains the role of comprehensive planning in addressing the legacy of officially-created segregation in New York City. Similarly, in 2018 Council Member Brad Lander correctly noted in [Desegregating NYC: Twelve Steps Towards a More Inclusive City](#) that “[i]f the fair housing planning process is real, it must lead to comprehensive citywide planning, with desegregation as one of its goals, that sets the City’s agenda for growth and development going forward” (12).

While we are glad to see that the bill would require its “Conditions of the City report” to conduct an “assessment of segregation,” we do not believe that the bill goes far enough to identify integration as one of a paramount policy objective of comprehensive planning. Integration should be listed among the specifically listed “citywide policy goals” to be included in the “preliminary citywide goal statement” along with “goals to reduce and eliminate disparities across race, geography and socioeconomic status in access to opportunity and the distribution of resources and development,” etc. (intro. 2186, page 1, line 11 and following).

Without this and similar amendments, this legislation, if enacted, will continue to allow policymakers to avoid intentional policies to integrate New York City as they have for the last century. The City need look no further than its own abysmal 2020 *Where We Live* plan to see

how easily this can happen when the goal of integration is obscured – even in a report supposedly prepared in furtherance of a HUD rule to promote integration.¹

Finally, to ensure that the final comprehensive long-term plan contemplated by this bill serve as a meaningful guide to the city’s land-use and zoning policies, the bill must state explicitly that this final plan is intended to serve as authoritative evidence of the city’s “well-considered plan” for the purpose of state² and local³ law pertaining to the administration of zoning. If this statement cannot be placed in the legislation itself, then it should be stated in the committee report.

¹ See comments of New York Appleseed on the 2020 Where We Live draft plan available at <https://www.nyappleseed.org/our-response-to-the-where-we-live-report/> and those of the New York City Bar Association available at <https://s3.amazonaws.com/documents.nycbar.org/files/2020661-WhereWeLiveReport.pdf>.

² General City Law §20 (25).

³ New York City Administrative Code §25-111.