



February 23, 2021

AIA New York Statement of Support for Int. 2186, Comprehensive Plan Bill

Comprehensive planning is a necessary addition to New York's land use policies. For too long, public- and private-sector design and construction have been uncoordinated in addressing the city's needs around housing, open space, and transportation. The only way to achieve this level of citywide coordination is through the implementation of a long-term comprehensive plan, like the one envisioned in Int. 2186. As the professionals charged with implementing many of the bill's provisions, architects are strongly supportive of this effort. However, there are some important changes that AIA New York believes should be instituted to improve the bill.

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First, the amended bill should accelerate the timeline for the final adoption of the comprehensive plan. It is unclear whether elected officials and city agencies will continue to pursue necessary projects while the plan is in development, as they may opt to wait years until the plan is in effect to ensure that these projects are in accordance with it. An adoption date of June 2025 may therefore significantly delay both design and construction.

The bill should also consider more precise geographic boundaries than community districts, which are based on demographic realities from decades ago and can be far too large to be effective for planning purposes. Five community districts (Manhattan 8, 12; Queens 12, 13; Brooklyn 18) have populations larger than or approximating Rochester's, our state's third largest city, and one community district (Queens 12) has a population approaching Buffalo's, our state's second largest city. As such, district-level targets may not be able to fully address the needs of a district, particularly the needs of more marginalized communities.

Lastly, the power instilled in the Director of the Office of Long-Term Planning is concerning. The bill would allow for the director, an unelected official, to hold sway over much of the comprehensive planning process and at times make unilateral decisions on design and construction. Furthermore, there are no professional qualifications required for this director position, and there is no mandate that the director to be an architect, engineer, planner, or any other type of land use professional. A single government official who is both unaccountable to voters and lacking professional expertise should not be given such great power over the design of our buildings, public spaces, and transportation systems.

Int. 2186 is an important first step in instituting a much-needed comprehensive plan for our city. We hope our recommendations are strongly considered in an amended version of the bill. Architects want to design a more equitable city, and we believe our recommendations would help the city achieve this goal. Thank you to Speaker Johnson and the rest of the bill's sponsors for proposing this important legislation.

Board of Directors, AIA New York