
ISSUE BRIEF

**APPLYING A PREVAILING WAGE REQUIREMENT
FOR BUILDING SERVICE WORKERS IN BUILDINGS
THAT RECEIVE 421-A PROPERTY TAX EXEMPTIONS
IN THE GREENPOINT-WILLIAMSBURG REZONING AREA**

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**Pratt Institute Center for Community and Environmental Development
Issue Brief (April 1, 2005)**

Applying a Prevailing Wage Requirement for Building Service Workers in Buildings that Receive 421-a Property Tax Exemptions in the Greenpoint-Williamsburg Rezoning Area

Executive Summary

The Service Employees International Union Local 32BJ has proposed legislation applying prevailing wage standards to New York City subsidies for newly constructed residential buildings in Greenpoint-Williamsburg. These subsidies, in the form of 421-a property tax exemptions, could exceed \$200 million. Based on a review of this legislation and a financial analysis of its impact (contained in this report), the Pratt Center recommends City Council adoption of the bill.

The rezoning of Greenpoint-Williamsburg, as proposed by the Department of City Planning, will likely facilitate the development of 8,000 to 10,000 new units of housing in the next 10 years, with the majority consisting of market-rate units near the East River waterfront. Developers are likely to receive 421-a property tax exemptions worth well over \$200 million, or over \$25,000 per unit. The proposed legislation would ensure that recipients of the tax exemption pay a prevailing wage to building service workers.

Economic Benefits for Workers and the City

The prevailing wage requirement would make a substantial difference to building service workers, by raising the wages of a mostly immigrant workforce by as much as 30% and providing them with affordable, quality health coverage. The City would also benefit, as workers would pay more in taxes, and would no longer rely on public subsidies for health care or income supplements.

Minimal Impact on Profitability or Affordable Housing

The proposed prevailing wage requirement would not have a significant adverse impact on developer return. Furthermore, a prevailing wage requirement would not impede a developer's decision to include affordable units in the development. A developer could profitably include affordable housing under several of the options offered by the City of New York, and still pay a prevailing wage to building service workers.

Potential for Targeted Local Hiring

While not included in the legislation proposed by Local 32BJ, the Pratt Center recommends that owners include a first-source hiring provision to insure that 50% of new building service workers come from the Greenpoint-Williamsburg community. The NYC Department of Small Business Services would be well positioned to help administer such a program.

Requiring developers who receive a property tax exemption to pay a prevailing wage to building service workers and hire community residents is a smart, equitable, and fiscally responsible policy for New York City.

Background on the Greenpoint-Williamsburg Rezoning

The New York City Department of City Planning has proposed a sweeping rezoning in the neighborhoods of Greenpoint and Williamsburg, along two miles of the East River waterfront in Community Board 1 in Brooklyn. The rezoning and related actions would facilitate the redevelopment of 184 blocks over 400 acres, allow for residential and commercial development, and establish new waterfront parkland in an area currently zoned primarily for industrial and manufacturing uses.

According to the Draft Environmental Impact Statement (DEIS) for the rezoning, the Department of City Planning projects that 8,000 to 10,000 new units of housing will be built in the rezoning area in the next 10 years. Over two-thirds of these units are likely to be created on waterfront sites, with 15- to 35-story buildings near the waterfront, and 4- to 6-story buildings on the upland portions of the waterfront sites (along Kent Avenue). The remaining units would be built on upland sites, in 4- to 7-story buildings and in conversions of existing loft buildings.¹

Community residents have raised a range of concerns about the proposed rezoning action. Many have called for stronger provisions to guarantee affordable housing and to protect existing residents – out of concern that new development will be predominantly market-rate, far out of the reach of most residents of the community, and is likely to displace existing tenants as rents and property values rise. There is also concern that the rezoning will lead to the ongoing displacement of manufacturing businesses and jobs. While manufacturing jobs have declined steadily in the area over the past several decades, there are still over 4,000 manufacturing and industrial jobs in Greenpoint-Williamsburg. Many of these jobs – which offer an important source of employment for blue-collar community residents, and especially for immigrants – will be at risk of displacement following the rezoning. The Pratt Center has raised concerns about both of these issues, and has been especially active in calling for a guarantee of affordable housing through inclusionary zoning and other strategies.²

The NYC Department of City Planning, the NYC Department of Housing Preservation and Development (HPD), elected officials, community organizations, churches, and advocates are currently negotiating over several features of the rezoning – especially provisions to guarantee affordable housing. Community organizations and advocates have called for a requirement, known as mandatory inclusionary zoning, that developers include affordable housing in their market-rate developments. City Planning and HPD have instead proposed a combination of voluntary density bonuses and financial incentives to induce developers to include affordable housing, along with a commitment to create affordable units on City-owned and other sites.³

¹ NYC Department of City Planning (2004), Draft Environmental Impact Statement for the Greenpoint-Williamsburg Rezoning (<http://www.nyc.gov/html/dcp/html/greenpointwill/greenoverview.html>).

² Pratt Institute Center for Community and Environmental Development (2004), *Increasing Housing Opportunity in New York City: The Case for Inclusionary Zoning* (<http://www.picced.org/pol-izreport.php>), and testimony on the Greenpoint-Williamsburg Rezoning, (<http://www.picced.org/test-greenpoint.php>).

³ The City's proposal for affordable housing is modeled on the agreement reached between the Bloomberg Administration and the New York City Council in the Hudson Yards Rezoning.

421-a Property Tax Exemptions

It is anticipated that most developers who build new residential developments following the rezoning will seek property tax exemptions under Section 421-a of the Real Property Tax Law of the State of New York. Under the 421-a program, developers are exempt for a period of years from paying property tax increases that result from the construction of new, multifamily housing developments (rental, cooperative, and condominium).

The available exemption varies depending on location and affordability. Market-rate developments outside of core Manhattan are eligible for a 15-year exemption (a full exemption for the first 11 years, phasing out over the subsequent four years). Developments outside of core Manhattan that include 20% affordable units are eligible for a 25-year exemption (a full exemption for the first 21 years, phasing out over the subsequent four years).

The NYC Independent Budget Office estimates that the average lifetime cost to the City in foregone tax revenue for a 15-year exemption is \$19,385 per unit, and the average cost for a 25-year exemption is \$31,271 per unit.⁴ Assuming these values, and an equal mix of 15- and 25-year exemptions, the lifetime cost of 421-a exemptions for the new housing likely to be built in Greenpoint-Williamsburg over the next decade will likely exceed \$200 million. (The financial analysis that we prepared suggested that the value of the lost tax revenue could be far higher. The net present value (at a discount rate of 5%) of the scenarios we reviewed suggested that the cost of exemptions could range from \$171,000 to over \$300,000 per unit – potentially resulting in foregone tax revenue of well over \$1 billion).

Building Service Jobs in the Greenpoint-Williamsburg Rezoning

The construction of 8,000 to 10,000 units of housing in Greenpoint-Williamsburg will create several hundred new buildings service jobs. While these new jobs are unlikely to match the number of manufacturing jobs lost, they will be a valuable source of employment – providing good wages and benefits for a workforce that it predominantly made up of people of color and immigrants.

More than 80% of the building service workers in high-rise, market-rate residential buildings in Manhattan – of the type that are likely to be constructed on the Greenpoint-Williamsburg waterfront – are members of SEIU 32BJ. Based on the standards in the market, the New York City prevailing wage for these positions is \$18.57 per hour, plus a supplemental benefit rate of \$4.23 per hour. As a result, workers earn salary and benefits package in excess of \$40,000 per year, substantially better than most of the retail and service jobs being created in the current New York City economy

However, it is unclear whether building service workers in new residential development in Greenpoint-Williamsburg will be paid prevailing wages. At present, there are few high-rise, market-rate, buildings that have been newly constructed in Brooklyn within the past ten years. One comparable building, the Avalon Riverview building near the East River waterfront in Long Island City, Queens, is not unionized and pays its workers below prevailing wage.

⁴ New York City Independent Budget Office (2003), *Worth the Cost? Evaluating the 421-a Property Tax Exemption*, (<http://www.ibo.nyc.ny.us>)

SEIU Local 32BJ has proposed legislation to the New York City Council that would apply prevailing wage standards to subsidies for newly constructed residential buildings in Greenpoint-Williamsburg. For these buildings, recipients of a 421-a property tax exemption would be required to pay a prevailing wage to building service workers as a condition of the tax exemption.

Labor Costs and Wages

In order to estimate the impact of a prevailing wage requirement, we estimated the difference between prevailing wages and non-prevailing wages for building service workers in New York City. Prevailing wages are set according to the schedule of union wages and benefits. Currently, SEIU 32BJ members in residential buildings in New York City⁵ earn \$18.57 per hour, plus a benefits package worth an additional \$4.23 per hour.

Because there is no comparable schedule for non-union labor costs, however, it is impossible to determine with certainty the relationship between prevailing wage and non-prevailing wage labor costs. In our conversations with developers, owners, and managers for this brief, we collected widely varying information. Most of the developers and managers of unionized buildings primarily operate Manhattan high-rises. Most of the developers and managers of buildings in Brooklyn primarily operate mid-rise buildings that are smaller and less expensive than those that will be built in Greenpoint-Williamsburg. Some unionized operators estimated that non-union competitors paid as much as 50% less for maintenance costs.⁶ Other anecdotal evidence suggests that for similarly-situated buildings, the costs of union- and non-union labor are comparable, but that the benefits package for unionized employees is superior.

To develop an estimate, we relied upon data culled from the Bureau of Labor Statistics, and from the Department of Finance's Real Property Income and Expense (RPIE) statements, as reported by the NYC Rent Guidelines Board.⁷

This model assumes that prevailing wages for building service workers would exceed non-prevailing wages by 30%. This assumption is based upon the differential between the mean hourly earnings for full-time janitors and cleaners for all workers (including union and non-union workers) and the union hourly rate for the same group of employees.⁸ This differential is not a precise proxy for the premium for prevailing wage labor, if any, because union wages are included in both figures, and neither figure accounts for the cost of benefits, which would be higher for union labor. However, we believe that this assumption is roughly accurate, and that it errs on the side of assuming a high premium for prevailing wage labor (in order to make a conservative estimate of the impact on developers).

⁵ Not including the Bronx.

⁶ Although in some cases operators suggested this also included providing fewer maintenance workers overall.

⁷ These data include both union and non-union labor costs.

⁸ According to the Bureau of Labor Statistics, this amount was \$14.31/hour in metropolitan New York City in April 2004. <http://www.bls.gov/ncs/ocs/sp/ncbl0668.txt> During the same period, the hourly wage rate for union janitors was \$18.57/hour. The differential between these two amounts is 30%.

Impact for Building Service Workers

Earning the prevailing wage would likely have a large impact on the several hundred building service workers to be hired for these buildings.

According to a 2003 labor market profile prepared by the Fiscal Policy Institute:

Unionized building service workers earn wages that are higher than those of non-union workers and they uniformly receive health and other fringe benefits. Both the wages and benefits received by unionized building service workers are considered very good for workers with comparable educational levels. Total annual wages and benefits for the average SEIU 32B-32J unionized commercial building service worker in New York City is \$45,119. For the average unionized residential building service worker, the comparable figure is \$43,085.⁹

Assuming the 30% differential between wages discussed above, a prevailing wage requirement would boost the annual wages for a building service worker from approximately \$29,700 to over \$38,600 (not including benefits). With benefits included, total compensation would rise from \$36,500 (without prevailing wage) to \$47,400 (with prevailing wage).

This is a significant increase. At \$29,700 (the equivalent of \$14.31 per hour), a family of four would still be earning below 200% of the poverty line – a cutoff for subsidy eligibility for a number of New York State programs. With the prevailing wage, especially when benefits are factored in, a building service worker would be approaching the “self-sufficiency standard:” the income a family needs in order to meet all basic needs such as food, housing, and child care.¹⁰ This compares especially favorably with the lower wages in retail and service employment, the predominant type of blue-collar jobs available to immigrants being created in the current New York City economy.

Impact for the City and State of New York

The City and State of New York would also stand to benefit from this increase in wages. Workers who receive the prevailing wage would pay 30% more in taxes. Moreover, when a family is earning below 200% of poverty, they are eligible for a number of public subsidies for health care, job training, and other income supplements. When a family does not have health insurance coverage, they are far more likely to rely on uninsured emergency care from public hospitals, at significant expense to the City and State. Workers who receive the prevailing wage, including a health benefits package, would therefore save the state money in subsidies and health care, and contribute more in tax revenue.

⁹ Fiscal Policy Institute (2003), *Security Guard and Building Services Occupations in NYC, Trends and Issues*.

¹⁰ Pearce, Diana with Jennifer Brooks (2000), *The Self Sufficiency Standard for the City of New York*, Women’s Center for Education and Career Advancement.

Financial Analysis

The Pratt Center developed a financial model to estimate the effects of the proposed prevailing wage requirement. Specifically, the model analyzes the effect of this requirement upon developer return and affordable housing development. The model consists of two building prototypes that are likely in Greenpoint-Williamsburg: (a) a high-rise building on the waterfront and (b) a mid-rise building built upland. For each prototype, we assume three possible types of development: (1) a market rate condominium, receiving a 15-year as-of-right tax exemption; (2) a market rate condominium with an off-site affordable rental component built under the proposed Inclusionary Zoning program, receiving a 25-year tax exemption;¹¹ and (3) a rental development with an on-site affordable housing component, also built under the proposed Inclusionary Zoning program and receiving a 25-year tax exemption. We analyze each of the scenarios both with and without prevailing wages, assuming a 30% premium, as outlined above.

The model examines the potential internal rate of return (IRR) for the projects in question. One important factor in a developer's decision to develop a property is whether the potential IRR meets a "hurdle rate" – in the current market, generally considered to be 30% for condominiums and 16% for rentals.¹² The condominium scenarios for both high-rise and mid-rise developments are feasible, insofar as the projected IRRs far exceed this hurdle rate. The application of a prevailing wage requirement to these developments results in an almost negligible reduction in IRR. This is true for developments that are all market-rate, or for those that include some affordable housing units. However, the projected IRR for rental development, both high-rise and mid-rise, fall somewhat short of the hurdle rate, regardless of whether owners are required to pay a prevailing wage. As the NYC Department of Housing Preservation and Development and others have suggested, it is therefore questionable whether developers would choose to build rental buildings at this time.

This model suggests that imposition of a prevailing wage requirement for 421-a benefits would not materially affect the developments contemplated. A prevailing wage requirement would reduce developer return by so small an amount as to not affect the decision to develop a property. The same holds true with regard to a decision to include affordable housing units.

	Developer's Internal Rate of Return	
	<u>No Prev. Wage</u>	<u>With Prev. Wage</u>
<u>High-Rise Waterfront Development</u>		
Market-Rate Condos	209.9%	209.6%
Market-Condos with Offsite Affordable Rental	153.6%	153.3%
Market Rentals w/Onsite Affordable Rentals (80/20)	11.0%	10.5%
<u>Mid-Rise Upland Development</u>		
Market-Rate Condos	210.8%	210.7%
Market-Condos with Offsite Affordable Rental	139.2%	139.0%
Market Rentals w/Onsite Affordable Rentals (80/20)	11.5%	11.2%

A summary of the financial model is attached. A full version is available at <http://www.picced.org>.

¹¹ This scenario assumes that a developer will provide the off-site land as an equity contribution and will effectively contribute the completed off-site affordable building to a non-profit organization for management. For this reason, the operating budget of the off-site building is not included in the financial model.

¹² Other factors in a developer's decision include the projected Net Present Value of the investment and non-financial benefits of development (social, reputational, etc).

Potential for Targeted Local Hiring

While not included in the legislation proposed by SEIU Local 32BJ, the Pratt Center recommends that owners include a first-source hiring provision to insure that 50% of new building service workers come from the Greenpoint-Williamsburg community. These new jobs in building services could help partially to offset the loss of manufacturing jobs in the neighborhood – jobs that are largely held by immigrant workers – a loss which is likely to be accelerated as a result of the rezoning, as more properties are converted to residential use.

Members of SEIU 32BJ are already broadly representative of low- and moderate-income residents in Greenpoint-Williamsburg. More than 90% of 32BJ members who work in New York City live in New York City. Over 2,200 members live in 33rd or 34th City Council Districts, which include North Brooklyn. Over 60% of the 32BJ members are of African, Asian, or Latino descent.

Because 32BJ does not have a “bench” (i.e. unemployed workers do not remain in the union, with a first shot at new jobs), employers will hire new workers for the new jobs created in building in Greenpoint-Williamsburg. This provides an opportunity to develop a first-source hiring program, in which residents of the community have priority for some of the jobs.

We recommend that the NYC Department of Small Business Services (SBS) coordinate this effort. SBS could work with developers, community organizations, immigrant and day labor groups, and elected officials in the community to develop an outreach and first-source hiring program, to insure that 50% of the new building service jobs – which would pay a prevailing wage if the proposed legislation is adopted – go to residents of Greenpoint-Williamsburg.

Conclusion

Developers of the 8,000 to 10,000 new units of housing in Greenpoint-Williamsburg will be receiving over \$200 million in 421-a property tax exemptions, a subsidy provided by the City of New York. These developers can profitably develop new housing, include affordable units, and pay a prevailing wage to their building service workers. The prevailing wage requirement will make very little difference to developers, but it will make a substantial difference to building service workers and their families. With a first-source hiring program, many of these new employees can come from the surrounding neighborhoods.

The New York City Council and Bloomberg Administration have a valuable opportunity to share the benefits of the city’s prosperity. Applying a prevailing wage requirement for building service workers to property tax exemptions in the Greenpoint-Williamsburg rezoning is a smart, equitable, and fiscally responsible policy for New York City.

Pratt Institute Center for Community and Environmental Development
Applying a Prevailing Wage Requirement for Building Service Workers to 421-a Property Tax Exemptions in Greenpoint-Williamsburg, Brooklyn

Summary of Financial Analysis
High-Rise (Waterfront)

		All Scenarios	
Building	Site Area On-Site (SF)		100,000
	Commercial Space (SF)		25,000
	Parking Requirement (% of units)		54.4%
Development	Land Costs - On-Site (ZSF)	\$	100
	Land Costs - Off-Site (ZSF)	\$	50
	Infrastructure Cost/Site Area SF	\$	60
	Res. Hard Costs - On-Site (SF)	\$	200
	Res. Hard Costs - Off-site (SF)	\$	150
	Parking/Space	\$	30,000
	Commercial Hard Costs (SF)	\$	150
	Unit Size (SF)		850
	Soft Cost; % of Hard Cost		25%
	Developer Fee; % of Hard & Soft Cost		10%
Rents	Market/SF	\$	40
	Market/Unit/Month	\$	2,833
	Affordable/SF	\$	9
	Affordable/Unit/Month	\$	652
	Parking/Space/Month	\$	30,000
	Commercial Rent (SF)	\$	25

		Market Condominium		Market Condo w/ Off-Site Afford. Rental		Market Rental w/ On-Site Afford. Rental	
Building	Site Area Off-Site (SF)			30,000			
	FAR On-Site	4.0		4.7		4.7	
	FAR Off-Site			3.0			
	Total Units	375		535		445	
	Market Units	374		444		355	
	Affordable Units On-Site					89	
	Affordable Units Off-Site			89			
	Superintendent Units	1		2		1	
	Percentage Affordable of Total Units	0%		17%		20%	
	Total Development Cost	\$	162,696,250	\$	212,597,500	\$	190,513,750
Financing	Developer Equity (% of TDC)	20%		23%		33%	
	4% Tax Credit Equity (% of TDC)					\$	720,252
		No PW	Yes PW	No PW	Yes PW	No PW	Yes PW
Condo Common Charge	Year 1/Month/SF	\$ 0.93	\$ 1.01	\$ 0.93	\$ 1.01		
	Value of 421-a abatement/Month/SF	\$ 0.18	\$ 0.17	\$ 0.18	\$ 0.18		
	Condo Common Charge plus Value of Abatement/Month/SF	\$ 1.11	\$ 1.18	\$ 1.11	\$ 1.18		
Condo Sales	Base Price/SF	\$ 750	\$ 750	\$ 750	\$ 750		
	Additional Price/SF (capitalized 421-a)	\$ 63	\$ 62	\$ 66	\$ 64		
	Total Price/SF	\$ 813	\$ 812	\$ 816	\$ 814		
	Total Price/Unit	\$ 691,315	\$ 689,823	\$ 693,219	\$ 691,670		
421-a; value of residential benefit							
	NPV/unit, discounted at 5%	\$ 207,779	\$ 202,019	\$ 366,535	\$ 356,344	\$ 269,866	\$ 259,677
	Resulting additional sale price/condo. u 35%	\$ 53,815	\$ 52,323	\$ 55,719	\$ 54,170	NA	NA
Developer Return	ROE, Year 1	NA	NA	2.5%	2.2%	2.9%	2.4%
	IRR (includes developer fee)	209.9%	209.6%	153.6%	153.3%	11.0%	10.5%

Pratt Institute Center for Community and Environmental Development
Applying a Prevailing Wage Requirement for Building Service Workers to 421-a Property Tax Exemptions in Greenpoint-Williamsburg, Brooklyn

Summary of Financial Analysis
Mid-Rise (Upland)

		All Scenarios	
Building	Site Area On-Site (SF)		15,000
	Commercial Space (SF)		
	Parking Requirement (% of units)		54.4%
Development	Land Costs - On-Site (ZSF)	\$	75
	Land Costs - Off-Site (ZSF)	\$	50
	Infrastructure Cost/Site Area SF	\$	60
	Res. Hard Costs - On-Site (SF)	\$	175
	Res. Hard Costs - Off-site (SF)	\$	150
	Parking/Space	\$	30,000
	Unit Size (SF)		850
	Soft Cost; % of Hard Cost		25%
	Developer Fee; % of Hard & Soft Cost		10%
Rents	Market/SF	\$	32
	Market/Unit/Month	\$	2,267
	Affordable/SF	\$	9
	Affordable/Unit/Month	\$	652
	Parking/Space/Month	\$	250

		Market Condominium		Market Condo w/ Off-Site Afford. Rental		Market Rental w/ On-Site Afford. Rental	
Building	Site Area Off-Site (SF)			4,000			
	FAR On-Site	3.0		3.6		3.6	
	FAR Off-Site			3.0			
	Total Units	45		66		54	
	Market Units	44		53		42	
	Affordable Units On-Site					11	
	Affordable Units Off-Site			11			
	Superintendent Units	1		2		1	
Percentage Affordable of All Units		0%		17%		20%	
Total Development Cost		\$ 15,193,125		\$ 21,203,750		\$ 18,240,000	
Financing	Developer Equity (% of TDC)	20%		25%		32%	
	4% Tax Credit Equity (% of TDC)					\$ 84,029	
		No PW	Yes PW	No PW	Yes PW	No PW	Yes PW
Condo Common Charge	Year 1/Month/SF	\$ 0.65	\$ 0.68	\$ 0.65	\$ 0.68		
Value of 421-a abatement/Month/SF		\$ 0.15	\$ 0.15	\$ 0.15	\$ 0.15		
Condo Common Charge plus Value of Abatement/Month/SF		\$ 0.80	\$ 0.83	\$ 0.80	\$ 0.83		
Condo Sales	Base Price/SF	\$ 600	\$ 600	\$ 600	\$ 600		
	Additional Price/SF (capitalized 421-a)	\$ 54	\$ 53	\$ 55	\$ 54		
	Total Price/SF	\$ 654	\$ 653	\$ 655	\$ 654		
	Total Price/Unit	\$ 555,872	\$ 555,217	\$ 556,389	\$ 555,710		
421-a; value of residential benefit							
NPV/unit, discounted at	5%	\$ 173,641	\$ 171,158	\$ 300,183	\$ 295,791	\$ 226,493	\$ 222,097
Resulting additional sale price/condo. u	35%	\$ 45,872	\$ 45,217	\$ 46,389	\$ 45,710	NA	NA
Developer Return	ROE, Year 1	NA	NA	1.6%	1.4%	2.9%	2.6%
	IRR (includes developer fee)	210.8%	210.7%	139.2%	139.0%	11.5%	11.2%

THE PRATT CENTER: PLANNING FOR EQUITABLE DEVELOPMENT

The Pratt Institute Center for Community and Environmental Development works for a more just, equitable, and sustainable city for all New Yorkers, but empowering communities to plan for and realize their future. As part of Pratt Institute, we leverage professional skills – especially planning, architecture, and public policy – to support community-based organizations in their efforts to improve neighborhood quality-of-life, attack the causes of poverty and inequality, and advance sustainable development.

This issue brief is part of our *Planning for Equitable Development* initiative. Through this initiative, we seek to insure that the costs and benefits of economic and real estate development in New York City are fairly shared – especially in low-income and disenfranchised communities which often bear the brunt of development without benefiting much from it. We believe that development that includes public subsidies should create affordable housing, good jobs and targeted workforce development strategies, and other community benefits.

This report was prepared by the Pratt Institute Center for Community and Environmental Development. It does not necessarily reflect the official position of Pratt Institute.

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