

August 5, 2026

COUNT NEIGHBORHOOD CULTURAL ASSETS AS COMMUNITY FACILITIES IN CITY ENVIRONMENTAL REVIEW

New York City should amend the City Environmental Quality Review (CEQR) process to recognize neighborhood cultural assets—including cultural organizations, cultural businesses, creative production spaces, and artists' housing—as community facilities for purposes of direct displacement analysis and indirect population growth analysis.

ISSUE STATEMENT

New York City's environmental review process evaluates whether discretionary land-use actions displace neighborhood-serving facilities or create demand for additional neighborhood services. Neighborhood cultural assets are the only major category of neighborhood-serving resources that are not evaluated under these procedures.

The Social Impact of the Arts Project (SIAP) provides a framework for identifying neighborhood cultural assets. SIAP defines cultural presence through four components: nonprofit cultural organizations, cultural businesses, artist living and working space, and resident cultural participation. Our proposal translates the three spatial components into four categories—nonprofit cultural organizations, cultural businesses, creative production spaces, and artists' living spaces—because they have a physical presence that can be directly affected by land-use decisions and evaluated using CEQR methodologies. CEQR does not currently evaluate any of them as neighborhood-serving facilities.

As a result, the City does not evaluate whether a project displaces existing cultural assets or whether new development creates demand for cultural resources that a neighborhood cannot meet.

Outside environmental review, the City's principal tool for supporting neighborhood cultural assets is discretionary grantmaking. Grants support individual organizations after funding decisions are made; they are not designed to evaluate neighborhood-level impacts before land-use decisions occur.

The Social Impact of the Arts Project (SIAP) provides a framework for identifying neighborhood cultural assets. SIAP defines cultural presence through four components: nonprofit cultural organizations, cultural businesses, artist living and working space, and resident cultural participation. Our proposal translates the three spatial components into four categories—nonprofit cultural organizations, cultural businesses, creative production

spaces, and artists' living spaces—because they have a physical presence that can be directly affected by land-use decisions and evaluated using CEQR methodologies. CEQR does not currently evaluate any of them as neighborhood-serving facilities.

BACKGROUND

The CEQR Technical Manual defines community facilities as public or publicly funded schools, libraries, child care centers, health care facilities, and fire and police protection. Each is evaluated for direct displacement and indirect population-growth impacts. Screening thresholds determine when a detailed analysis is required.

The Technical Manual also recognizes religious and cultural facilities as “other community facilities,” but only when a project directly displaces or alters them. Unlike schools and libraries, they are not evaluated for indirect population-growth impacts, and no screening thresholds assess whether neighborhood cultural capacity is sufficient for new residents.

Local Law 78 of 2021 demonstrates that the City Council can require additional analyses during the land use review process and direct City agencies to develop the supporting methodology and data. It also illustrates the importance of establishing screening thresholds that capture a meaningful range of land use actions rather than only the largest projects. This recommendation similarly calls for expanding CEQR's analytical framework by applying existing methodologies to an additional category of neighborhood-serving resources, rather than creating a new review process.

Research from the University of Pennsylvania's Social Impact of the Arts Project (SIAP) provides the empirical basis for this proposal. Across New York City neighborhoods, SIAP found that higher concentrations of neighborhood cultural assets are consistently associated with stronger measures of social wellbeing, including civic engagement, social connection, and collective efficacy. These relationships are strongest in lower-income neighborhoods and remain significant after controlling for income, education, and race. Together, these findings demonstrate that neighborhood cultural assets function as public infrastructure, producing measurable public benefits that extend beyond the organizations and businesses themselves.

This proposal does not create a new environmental review process or a new category of environmental impact. Rather, it extends an existing CEQR methodology to a category of neighborhood-serving assets that is currently excluded. By applying established procedures for evaluating direct displacement and indirect population growth, the City can more fully assess how discretionary land use actions affect neighborhood cultural assets as a form of public infrastructure.

RATIONALE

CEQR evaluates community facilities because they are neighborhood-serving resources whose value depends on their physical location and the population they serve.

Neighborhood cultural assets meet the same planning criteria. They provide enduring public benefits—social, civic, and economic—that are shaped by land-use decisions and require physical space to exist. As a form of public infrastructure, they should be evaluated in CEQR using the same planning framework as other neighborhood-serving resources.

CEQR already recognizes that community wellbeing depends on more than life-safety infrastructure. It evaluates libraries, open space, historic and cultural resources, neighborhood character, and other neighborhood-serving assets because land-use decisions can affect the quality of civic life and the provision of essential services. Neighborhood cultural assets belong within that same planning tradition. They support social connection, civic participation, creative expression, and local economic activity, all of which contribute to healthy, resilient communities.

Neighborhood cultural assets comprise four complementary components. Nonprofit cultural organizations provide mission-driven cultural programming and public access. Cultural businesses—including bookstores, music venues, galleries, cinemas, performance venues, and other publicly accessible cultural enterprises—provide places where residents experience and participate in cultural life. Creative production spaces—including studios, rehearsal spaces, fabrication shops, and design and media production facilities—provide the shared infrastructure where cultural work is made, supporting employment and creative enterprise. Artists' living spaces sustain the people whose creative labor makes these sectors possible. Together, these spatial assets form a neighborhood's cultural ecology and are directly affected by land use decisions.

For purposes of environmental review, the relevant distinction is not whether a cultural asset is nonprofit or commercial, but whether it provides a neighborhood-serving cultural function and has a physical presence that can be affected by land-use decisions. Like other neighborhood-serving resources evaluated through CEQR, these assets are vulnerable to displacement, changes in accessibility, and shifts in demand resulting from development.

Like schools, libraries, and parks, neighborhood cultural assets create value through shared public use rather than individual transactions. Their contribution depends on their continued presence within a neighborhood and cannot be understood through the success or failure of any single organization or business.

Recognizing neighborhood cultural assets as a form of public infrastructure does not expand CEQR beyond its established purpose. It applies an existing planning framework to neighborhood-serving resources that have a physical presence, generate measurable public benefits, and are subject to discretionary land-use decisions. The proposal therefore strengthens CEQR's ability to identify, disclose, and evaluate the full range of neighborhood impacts while remaining consistent with its existing methodology.

EXPECTED BENEFITS AND OUTCOMES (WHAT WILL CHANGE?)

This proposal would improve environmental review by making neighborhood cultural assets visible within the City's existing planning framework.

Environmental review would disclose cultural impacts. Projects that displace nonprofit cultural organizations, cultural businesses, creative production spaces, or artists' living spaces would identify those impacts, including effects on employment and production capacity.

New development would be evaluated against neighborhood cultural capacity. Projects that add substantial residential population would assess whether existing neighborhood cultural assets can reasonably accommodate that growth, applying the same planning logic already used for schools, libraries, and other community facilities.

The City would create a durable planning dataset. A neighborhood-level cultural asset inventory maintained by the Department of Cultural Affairs would support environmental review and inform capital planning, budget decisions, neighborhood planning, City Council oversight, and community board review.

Decisions would become more transparent and equitable. An environmental review would make both cultural displacement and unmet neighborhood cultural needs visible in the public record, particularly in lower-income neighborhoods, where research demonstrates the strongest relationship between cultural presence and community wellbeing.

CEQR does not prohibit development. It requires that significant impacts be identified, disclosed, and considered before decisions are made. Recognizing neighborhood cultural assets as public infrastructure applies the same standard to an important category of neighborhood-serving resources, enabling more informed, transparent, and equitable land-use decisions.

IMPLEMENTATION

Implementation would build on CEQR's existing analytical framework rather than establishing a new review process.

Following adoption, the Mayor's Office of Environmental Coordination and the Department of City Planning would revise the CEQR Technical Manual to establish screening thresholds and analytical methods for neighborhood cultural assets. The Department of Cultural Affairs would develop, maintain, and publish a neighborhood cultural asset inventory to support environmental review and broader planning functions. CEQR applicants would evaluate direct displacement and indirect population-growth impacts using these standards, consistent with existing review procedures for other community facilities.

KEY PARTNERS AND STAKEHOLDERS

Legislative Leadership

The New York City Council would recommend the policy change either by amending CEQR requirements through legislation or by passing a resolution urging the responsible agencies to revise the Technical Manual.

- Deputy Speaker Nantasha Williams, Chair, Committee on Cultural Affairs, Libraries and International Relations and Members of the Committee.
- Kevin Riley, Chair, Committee on Land Use
- Farah N. Louis, Chair, Subcommittee on Zoning and Franchises

Implementing Agencies

- **Mayor's Office of Environmental Coordination** — Revise the CEQR Technical Manual and establish screening methodology.
- **Department of City Planning** — Develop analytical methods, screening thresholds, and implementation guidance.
- **Department of Cultural Affairs** — Build, maintain, and publish the neighborhood cultural asset inventory.

Research and Technical Partners

- University of Pennsylvania, Social Impact of the Arts Project (SIAP)
- Culture & Arts Policy Institute
- Research institutions, cultural service organizations, and data partners supporting inventory development and methodology

SOURCES / REFERENCES

Frischmann, B. M. (2012). [Infrastructure: The social value of shared resources](#). Oxford University Press.

Mayor's Office of Environmental Coordination. (2025). [City Environmental Quality Review Technical Manual](#) (December 2025 ed.). City of New York.

New York City Council. (2021). [Local Law 78 of 2021 \(Int. No. 1572-A\)](#).

Stern, M. J., & Seifert, S. C. (2017). [The social wellbeing of New York City's neighborhoods: The contribution of culture and the arts](#). University of Pennsylvania, Social Impact of the Arts Project.

Stern, M. J., & Seifert, S. C. (2025). [Cultural ecology and social wellbeing of New York City neighborhoods, 2022–2024](#) (Final report to The New York Community Trust). University of Pennsylvania, Social Impact of the Arts Project.

This Policy Recommendation is a publication of the Culture & Arts Policy Institute. Researched and written by Gonzalo Casals based on a recommendation by Ryan Gilliam. The Institute's mission is to strengthen the cultural sector by improving the systems, data, and governance structures that support it. culturepolicy.org | [@cultureapolicy](https://twitter.com/cultureapolicy)

License: This work is licensed under a Creative Commons Attribution-ShareAlike 4.0 International License.

Conflict of Interest Statement: All authors declare that they have no conflicts of interest.