

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: John T. Epting
Meghan Hottel-Cox

DATE: November 8, 2021

SUBJECT: Z.C. Case 21-13 – The Douglass – NHR Design Review – Racial Equity Analysis

The Comprehensive Plan (the “Plan”) calls for any action by the Zoning Commission to be analyzed “through a racial equity lens.” 10-A DCMR §2501.8. The Project, as detailed below and in the Office of Planning’s report in the record at Exhibit 13, furthers the Plan’s goals around racial equity, specifically due to the Project’s focus on (1) market-rate and affordable housing; (2) employment and training; (3) business opportunities; (4) sustainability; and (5) healthy communities.

The Plan defines racial equity as “the moment when ‘race can no longer be used to predict life outcomes and outcomes for all groups are improved.’” §213.8. The call to evaluate decisions through a racial equity lens is achieved by addressing structural racism, “target[ing] support to communities of color,” and “taking into account historical trauma and racism.” §213.9. The Plan gives specific examples of ways a project can work toward eliminating racial inequity, including “transportation, housing, employment, income, asset building, geographical change, and socioeconomic outcomes.” §213.10.

The Project includes many commitments that will implement these goals, as detailed below.

Market-Rate and Affordable Housing

The Plan focuses on the importance of the creation of affordable and mixed-income housing (§504.9) and housing for larger households, like three-bedroom residential units (§505.8). Additionally, the Mayor’s Housing Equity Report from 2019 notes the importance of creating additional market rate and affordable housing throughout the District. In the Lower Anacostia Waterfront & Near Southwest Area, where the Property is located, the report notes the equitable focus is on primarily market-rate housing given the over-concentration of affordable units in this area.

As detailed elsewhere in the Applicant's filings, the Project includes significant market-rate and affordable housing where there currently is none. Importantly, the Project includes no displacement of existing residents. With no displacement, the Project will create approximately 758 residential units including significant affordable units. These will include family-sized, three-bedroom units. The creation of both market-rate units and affordable units in Ward 8 furthers the goals of racial equity.

Employment and Job Training

The Plan also focuses on job training and employment opportunities, which can build income and asset building opportunities, as well as create more equitable socioeconomic outcomes. §715.7. The Project will create significant employment opportunities for nearby residents. First, the Project will create approximately 2,100 full time equivalent direct and indirect construction jobs. Additionally, the Project will create over 150 direct and indirect long-term job opportunities through the apartment building, the grocer, brewery and restaurant, and the in-line retail. Therefore, the Project will support job and career opportunities.

The Applicant is also committed to job training as part of the Project. The Applicant already operates an internal apprenticeship and training program for local high school and college students, which has been in place for over six years. The program specifically seeks interns living in Wards 7 & 8. Thus far the Applicant has employed three college students and five high school students in paid internships to learn more about the real estate development industry. Once construction of the Project begins, the Applicant will also have paid internship opportunities in construction. Therefore, the Project will directly create more jobs and training opportunities for local residents, many of whom are and will be people of color.

Business Opportunities

In addition to employment opportunities, the Plan also focuses on "opportunities to participate by small and minority-owned businesses . . . to close the racial income and wealth gaps in the District." §703.21. The Applicant and the Project focus on inclusion of local and minority-owned businesses. The Applicant has been working with F&L Construction, a local Ward 8 construction business, on site work thus far.

The Applicant is also working with the Anacostia BID to contract with local cleaning, landscaping, and trash removal organizations for site clean up moving forward. Finally, the Project will provide a 10% discount on rent for local retailers to lease at the Bridge District. All of these efforts provide additional opportunities for businesses in Ward 8, many of which are minority-owned, and help close racial income and wealth gaps.

Sustainability

The Plan notes that a focus on racial equity includes focusing on environment justice, which “refers to the fair treatment of people of all races” with respect to environmental laws and regulations. § 628.1. The Plan notes that “some District neighborhoods have been adversely impacted by pollution-generating uses and other forms of environmental degradation, particularly in Wards 5, 6, 7, and 8. . . . The legacy of these uses . . . disproportionately impact[s] often overlapping vulnerable populations, including . . . communities of color.” §628.2.

The Project includes significant, structural sustainability measures to counteract this previous legacy and focus on environmental justice. Specifically, the Project will raise the Property out of the 500-year floodplain to focus on resiliency. Additionally, the Project will be LEED Gold certified and contain significant solar panels to create renewable energy. The Project’s focus on sustainability help improve the surrounding environment and represent the Applicant’s larger commitment to improving overall environmental health.

Healthy Communities

The Plan also focuses on increasing equitable health access in communities, especially because “significant health disparities persist along dimensions of income, geography, race, gender, and age in the District.” §1105.1. There are multiple ways to create healthy communities, including improving non-automotive transit opportunities and creating access to healthy food.

The Project provides both. First, the Project is pedestrian- and bicycle- oriented, including the planned promenade, streetscape improvements, and the ease of access to transit. The Project also will include a local grocery store, which will “enhance healthy food access, address diet-related health disparities, and generate economic and social resilience by supporting the development of locally owned, community-driven grocery stores in areas with low access to healthy food options.” §1106.14. Through the grocery and the transportation improvements, the Project supports improving health in the community.

In conclusion, the Project is not inconsistent with the Plan, including the Plan’s racial equity goals. Therefore, as detailed above, the Commission’s approval of the Project would include concrete actions that would increase racial equity.

COMPREHENSIVE PLAN PROVISIONS

FRAMEWORK ELEMENT:

The District must also commit to normalizing conversations about race and operationalizing strategies for advancing racial equity. Racial equity is defined as the moment when “race can no longer be used to predict life outcomes and outcomes for all groups are improved.” §213.8

As an outcome, the District achieves racial equity when race no longer determines one’s socioeconomic outcomes; when everyone has what they need to thrive, no matter where they live or their socioeconomic status; and when racial divides no longer exist between people of color and their white counterparts. As a process, we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives, particularly people of color. Applying this lens also reflects the targeted support to communities of color through policies and programs that are aimed at centering – focusing on their needs and barriers to participate and make informed decisions – and eliminating racial divides, all while taking into account historical trauma and racism. §213.9

The District’s policies and investments should reflect a commitment to eliminating racial inequities. Addressing issues of equity in transportation, housing, employment, income, asset building, geographical change, and socioeconomic outcomes through a racial equity lens will allow the District to address systemic and underlying drivers of racial inequities. §213.10

HOUSING ELEMENT:

Policy H-1.2.3: Affordable and Mixed-Income Housing Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. § 504.9

Policy H-1.3.1: Housing for Larger Households Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail. § 505.8

ENVIRONMENTAL ELEMENT:

Environmental justice refers to the fair treatment of people of all races, cultures, national origins, and incomes, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. A just community is one in which all people experience protection from environmental and health hazards and have equal access to the decision-making process for having a healthy environment. § 628.1

These are particularly important principles to abide by when the goal of the Comprehensive Plan is to grow an inclusive city. Some District neighborhoods have been adversely impacted by pollution-generating uses and other forms of environmental degradation, particularly in Wards 5, 6, 7, and 8. Power stations, public works facilities, rail and highway infrastructure, and a variety of industrial uses have all been concentrated in these areas. Many were historically located in communities of color and low-income neighborhoods that lacked the resources to fight these uses. The legacy of these uses includes the pollution of the Anacostia River, contaminated sites, and continuing noise, air pollution, and hazardous cargo on roads and rail that disproportionately impact often overlapping vulnerable populations, including the young, the old, those with existing health conditions, lower income residents and communities of color. It is critical to identify and remove or mitigate these existing environmental conditions. Low-income and minority communities must not face disproportionate environmental burdens and must enjoy clean and safe places to live, work, play, and learn. As Washington, DC grows and changes, it is important to continue to focus on environmental justice through an equity lens in order to mitigate and prevent harm to current and future residents. Furthermore, all residents must have a fair and meaningful opportunity to participate in environmental decisions. § 628.2

ECONOMIC DEVELOPMENT ELEMENT:

Action ED-1.1.A: Economic Development Strategic Plan Maintain an Economic Development Strategic Plan that lays out in greater detail the steps the District must pursue to maintain and grow its economy. This plan should cover all economic sectors, evaluate competitiveness, and include strategies for workforce development, as well as business attraction and retention. It shall be developed through broad input from stakeholders, including those representing resident, industry, communities of color, and education interests. The Plan should identify approaches that provide recruitment and opportunities to participate by small and minority-owned businesses, and approaches to close the racial income and wealth gaps in the District. § 703.21

Equitable development can be built with greater access to career pathways. This access can be achieved through skill development and education programs that are tailored to the needs of growth industries with career pathways. These pathways link advancement to experience and skill development, enabling employees to earn increased levels of compensation as they progress. Some career pathways require higher levels of educational attainment to access, while

others feature opportunities for on-the-job training or progressive certifications. Over time, education programs, workforce development programs, and investments in equitable development are expected to increase labor force participation and career opportunities for residents. The data, programs, policies, and actions described here must be developed in the context of addressing the significant challenges facing the District’s low-income residents and communities of color regarding education and employment outcomes. The District can accomplish this by using a racial equity lens to guide investments, set and measure racially equitable outcomes, and employ innovative and proven best practices. § 715.7

COMMUNITY SERVICES AND FACILITIES ELEMENT:

One of Washington, DC’s most important resources is the health of its residents. While many of the District’s residents and neighborhoods enjoy exceptional health, significant health disparities persist along dimensions of income, geography, race, gender, and age in the District. § 1105.1

Action CSF-2.1.F: Advancing Grocery Store Access in Underserved Areas Enhance healthy food access, address diet-related health disparities, and generate economic and social resilience by supporting the development of locally owned, community-driven grocery stores in areas with low access to healthy food options. Such support should include targeted financing, technical assistance, and colocation with new mixed-use developments. 1106.14

IMPLEMENTATION ELEMENT:

Action: IM-1.B: Equity Tools for District Agencies, including the Zoning Commission Prepare and implement tools, including training, to assist District agencies in evaluating and implementing the Comprehensive Plan’s policies and actions through an equity, particularly a racial equity lens. This includes tools to use as part of the development review process, preparation of plans, zoning code updates, and preparation of the capital improvement program, that consider how to apply an equity analysis in these processes, including any information needed. *This shall specifically include a process for the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.* §2501.8 (emphasis added)

Throughout the Comprehensive Plan elements, the term “racial equity lens” is used for activities ranging from preparing small area plans to evaluating development decisions. The intent is for District agencies to develop processes and tools tailored to various programs, activities, and decisions, that center and account for the needs of residents of color, to achieve these outcomes:

- Identify and consider past and current systemic racial inequities;
- Identify who benefits or is burdened from a decision;
- Disaggregate data by race, and analyze data considering different impacts and outcomes by race; and

- Evaluate the program, activity or decisions to identify measures, such as policies, plans, or requirements, that reduce systemic racial inequities, eliminate race as a predictor of results, and promote equitable development outcomes. §2501.4