NW Opportunity Partners CDC

Expanding affordable housing and economic opportunities in NW DC

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Testimony Before the Zoning Commission
Public Roundtable on the Racial Equity Tool Z.C. Case No. 26-RE
October 26, 2026

Thank you for the opportunity to testify today. My name is Deirdre Brown. I am a Ward 3 resident, small business owner and housing advocate. I am testifying today in my capacity as the Vice Chair of the Northwest Opportunity Partners CDC. Our mission is to expand affordable housing and economic opportunities in Rock Creek West.

In September 2022, in Case No. 22-RT1, I testified before this same body that the draft Racial Equity Tool would not lead to meaningful change. We asked the Commission to:

1. Measure disparities against the incomes of Black and Brown families.
2. Assess who benefits and who is burdened, including displacement risk in surrounding areas.
3. Set a baseline and track whether interventions work.
4. Codify the Tool and apply it to every zoning decision.

The tool that was implemented made progress. It now asks for median income by race and homeownership by race, and the Commission reports that outreach has improved. But the Commission's own notice for this roundtable states three things:

- It has not consistently found a clear link between the data and the zoning actions under review.
- Its ability to assess racial equity impacts is limited because future outcomes are uncertain.
- Even a likely negative racial equity impact is not a basis to deny a zoning action.

Put plainly, the tool gathers data the Commission cannot tie to its decisions, no one measures what happens after approval, and a negative finding cannot change the outcome. As designed, the tool can describe inequity, but it cannot reduce it. Each of these three problems traces back to a 2022 recommendation that was not adopted.

What The District's Own Data Shows

The Mayor's Office of Racial Equity tracks housing gaps on its Racial Equity Dashboard. The gaps have not closed.

ZONING COMMISSION
District of Columbia
CASE NO. 26-RE
EXHIBIT NO. 9

Indicator	Black	White
Homeownership rate (2023)	32%	49%
Households cost burdened (2023)	44%	24%
Homelessness per 10,000 residents (2024)	167	24

Black homeownership has fallen from 38 percent in 2008 to 32 percent in 2023. Black households are about 41 percent of District households but 53 percent of cost-burdened households. Black residents are 82 percent of people experiencing homelessness, and that number rose from 3,764 in 2022 to 4,633 in 2024.

The Comprehensive Plan's own Housing Element reports that the median Black family in the District earns less than 50 percent of MFI. Most inclusionary zoning rental units are set at 60 percent of MFI. The affordable units zoning produces are priced above the typical Black family in this city. That is the link between the data and the decision that the tool is missing.

NWOP's Recommendations

1. **Ask whether the action reduces disparities.** Every racial equity analysis should state whether the action will reduce, maintain, or widen housing disparities by race, not only whether it is "not inconsistent" with the Comprehensive Plan. The Framework Element the tool cites defines equity as targeted action that meets residents where they are, not equal treatment.
2. **Require data that shows how an action affects housing.** Part Three now reports population, income, and age, which the Commission says it cannot connect to its decisions. It should also require:
    - **Who is struggling to afford housing now:** housing cost burden by race, for renters and owners separately.
    - **Who is at risk of being pushed out:** the displacement risk indicators NWOP proposed in 2022 (race, income, educational attainment, share of renters, and cost burden), measured for the surrounding neighborhood, not just the planning area.
    - **Whether the new units fit the people who live there:** the income levels of the affordable units the action would produce, compared with median household income by race in the area. This is the direct link between the data and the decision.
    - **Current goals to measure against:** replace the expired 2025 affordable housing goal with current targets, including the District’s goal of 20,000 new Black homeowners by 2030.

    - **Current sources:** add the Office of Racial Equity's Racial Equity Dashboard, which already tracks these housing measures by race, to the tool's approved data sources.
3. **Condition approvals where disparities would persist.** When the analysis shows an action will maintain or widen disparities, the answer need not be denial. It should be conditions: affordability below 60 percent of MFI, family-sized units of three or more bedrooms, and affordable homeownership. New density should be leveraged for deeply affordable housing.
4. **Mitigate direct displacement.** Before the hearing, applicants should demonstrate compliance with tenant protection laws, including TOPA. Orders should require relocation at comparable rents, a guaranteed right to return at affordable rents, and tracking of every displaced household.
5. **Reach the people the data identifies.** Outreach should document contact with renters and cost-burdened households in the affected area, not only ANCs and civic associations.
6. **Measure outcomes.** Outcomes are uncertain only when no one measures them. Require annual reporting on approved actions: affordable units delivered by income level, bedroom count, and tenure; who occupies them, by race; and where displaced households went. Use the results to revise the tool.
7. **Codify the tool and apply it to all zoning actions.** Adopt it through a zoning text amendment, and require the analysis for map amendments whose future matter-of-right buildings will never return to the Commission.

In 2022, NWOP asked for a tool that would measure progress toward closing racial gaps in housing. Four years later, the District's own data shows those gaps have not closed. We ask the Commission to make this tool a way to reduce disparities, not only describe them.

/s/Deirdre P. Brown, J.D.
Vice Chair, Northwest Opportunity Partners CDC

Sources

- Mayor's Office of Racial Equity, Racial Equity Dashboard: Homeownership and Housing Cost Burden (ACS 1-year estimates, 2023); Homelessness (HUD Point-in-Time counts, 2024)
- DC Comprehensive Plan, Housing Element
- Zoning Commission, Racial Equity Tool (February 3, 2023) and Notice of Public Roundtable, Z.C. Case No. 26-RE