WRITTEN TESTIMONY OF BINTA M. ROBINSON

D.C. Zoning Commission • Case No. 26-RE

Roundtable on the Racial Equity Tool • October 26, 2026

DC2050 Change Area 4.3 — Crestwood and Sixteenth Street Heights

I. Introduction and Requested Action

I submit this testimony in my individual capacity to address whether the Zoning Commission's Racial Equity Tool can meaningfully identify and prevent racial inequity when the underlying land-use framework has already been selected through the Comprehensive Plan process. My testimony focuses on the proposed Moderate-Scale Residential redesignation of portions of Crestwood and Sixteenth Street Heights within DC2050 Change Area 4.3. Although I focus on these neighborhoods, the racial-equity concerns raised by these proposed changes have broader implications for established residential communities throughout the District.

I request that the Commission strengthen the Racial Equity Tool used in matters within its zoning jurisdiction, require independent verification of applicant submissions, and require neighborhood-specific assessment of displacement, housing affordability, preservation, environmental, infrastructure, and cumulative financial impacts when considering zoning actions. I separately oppose the proposed intensification of DC2050 Change Area 4.3 and have raised that planning objection with the appropriate planning authorities.

Invoking housing affordability to justify increased residential density—whether through the proposed DC2050 land-use changes or subsequent zoning applications—does not establish that the additional market-rate housing enabled by those decisions will be affordable to Black Washingtonians. The Zoning Commission's Racial Equity Tool must require evidence of who can afford the housing, rather than treating increased development capacity as proof of racial equity. According to the U.S. Census Bureau's 2020–2024 American Community Survey five-year estimates, the median annual household income for Black households in the District was approximately $60,764—equivalent to about $1,519 per month at a 30-percent housing-cost benchmark. September 2026 District-wide median sale prices were approximately $499,950 for condominiums and cooperatives, $795,000 for attached townhouses and rowhouses, and $1,064,500 for detached single-family houses. These figures describe sales across the District, not prices specifically for newly constructed DC2050 housing. At an August 13, 2026 community meeting at the Takoma Park Library concerning DC2050, Office of Planning Director Anita Cozart explained that increasing housing supply was a central objective of the proposed Comprehensive Plan. She stated that research suggested additional housing supply could "at least stabilize the housing costs," while acknowledging that "[t]he research is still there and developing about whether or not it drives them down." (August 13, 2026 meeting transcript, approximately 17:32 and 27:04.) Thus, OP's own explanation of the housing-supply strategy underlying DC2050 does not establish that the proposed increases in residential density will reduce prevailing housing prices, much less make newly constructed market-rate housing affordable to Black Washingtonians earning the District's median Black household income of

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approximately $60,764 or less. Stabilizing already unaffordable housing prices is not equivalent to making housing affordable. Nevertheless, a $500,000 condominium purchased with 20 percent down would require a $100,000 down payment and approximately $2,463 in monthly principal and interest at an illustrative 6.25 percent mortgage rate, before taxes, insurance, and condominium fees—far above the $1,519 monthly housing-cost benchmark. Many Black Washingtonians, especially the approximately half of Black households earning below the median, therefore could not afford housing at these market prices.

Yet Crestwood and Sixteenth Street Heights in Ward 4 are proposed for particularly substantial intensification under the Office of Planning's DC2050 proposal, with Change Area 4.3 projected to accommodate 3,350 additional housing units—the largest total among Ward 4's four proposed change areas. Both neighborhoods have substantial Black homeowner communities whose homes represent family wealth and, for some families, intergenerational investment; these residents may face indirect displacement pressures associated with redevelopment, land speculation, and rising housing costs. Sixteenth Street Heights also includes numerous renters in multifamily buildings, including Black renters, who may face rent increases, building sales, redevelopment, harassment, or displacement. The racial-equity analysis must examine the distinct risks facing existing homeowners and renters of all racial and ethnic backgrounds, including the potential disproportionate displacement of Black homeowners and renters, the loss of Black intergenerational housing wealth, and the consequences for other historically disadvantaged communities. Increased housing-unit capacity must not substitute for an evidence-based assessment of who may lose housing, wealth, or the ability to remain in their neighborhoods. (Exhibit R, slide 19.)

This projection is housing capacity, not a demonstrated commitment to produce homes affordable to existing Black residents. Who will be able to afford the housing that DC2050 enables, and what evidence shows that upzoning these neighborhoods will remedy the shortage of housing affordable to Black Washingtonians? Why are portions of historically Black residential and homeownership communities in Crestwood and Sixteenth Street Heights proposed for more intensive land-use designations when the District has not demonstrated that the resulting housing will be affordable to many Black residents?

This is not only an objection to Change Area 4.3; it exposes a fundamental test for the Zoning Commission's Racial Equity Tool itself. If the District already knows that many Black households cannot afford housing at prevailing market prices, what does the Tool accomplish if a subsequent zoning application can invoke increased housing supply or affordability without demonstrating that the units enabled by the zoning action will be affordable to Black Washingtonians? A racial-equity finding must not equate granting a developer permission to construct additional market-rate housing—and thereby providing opportunities to accrue substantial financial and wealth-building benefits from increased development rights—with an actual reduction in racial housing inequity, particularly when the resulting housing may be unaffordable to many existing Black residents and other lower-income households.

The Tool should require independent, neighborhood-specific evidence of projected rents and purchase prices, the number and enforceability of income-restricted homes, affordability at Black household income levels—including below-median incomes—and who receives the financial benefits of additional development rights.

It should also measure who bears potential displacement, property-cost, infrastructure, and environmental burdens, compare impacts across neighborhoods, and require an explicit finding supported by evidence rather than accepting aggregate unit capacity or generalized promises of affordability as proof of racial equity.

The question is not whether additional supply might have wider market effects over time, but whether those effects are substantiated and whether the particular zoning action advances racial equity for existing residents.

Preservation of established architecture, longstanding Black homeownership, intergenerational wealth, and residential character is a central concern. Equally important is protecting existing renters against displacement, harassment, rising housing costs, and loss of affordable rental opportunities.

Source: U.S. Census Bureau, "Median Household Income Increased for Most Race and Hispanic Origin Groups in Majority of States Since Late 2000s" (January 29, 2026), 2020–2024 ACS five-year estimates, https://www.census.gov/library/stories/2026/01/household-income-by-race-and-state.html.

II. Disparate Geographic Treatment of Wards 3 and 4

The proposed DC2050 Future Land Use Map illustrates why the Commission's Racial Equity Tool should require meaningful geographic comparisons in subsequent zoning cases. Extensive established single-family residential interiors in Ward 3 appear to retain Small-Scale Residential designations, with much proposed intensification concentrated along commercial and transportation corridors. Portions of the established residential interiors of Crestwood and Sixteenth Street Heights in Ward 4, however, are proposed for Moderate-Scale Residential redesignation; Change Area 4.3 projects 3,350 additional housing units, the largest total among Ward 4's four proposed change areas. When a future zoning action seeks to implement adopted land-use policy, the Tool should require OP and applicants to explain the geographic distribution of benefits and burdens using comparable evidence about affected acreage, transit access, racial composition, homeownership and renter patterns, development capacity, and displacement risk. A FLUM designation alone should not be treated as proof that a subsequent zoning action is equitable.

The proposed DC2050 Future Land Use Map raises significant racial-equity questions because extensive established residential interiors in Ward 3 appear to retain their Small-Scale Residential designations, while portions of historically Black residential communities in Ward 4, including Crestwood and Sixteenth Street Heights, are proposed for Moderate-Scale Residential redesignation. This apparent geographic disparity warrants careful examination of the distribution of development benefits and burdens, including potential consequences for longstanding Black homeownership, intergenerational wealth, existing renters, and neighborhood preservation. The Zoning Commission's Racial Equity Tool should require comparable, neighborhood-specific evidence when evaluating subsequent zoning actions that implement these land-use policies.

III. Racial and Class Inequity in the Proposed Transformation of Historically Black Residential Homeowning Corridors

Additional development rights can increase opportunities for already wealthy developers while potentially impoverishing Black homeowners through speculative pressure, increased carrying costs, or the loss of homes that embody decades of accumulated family wealth. The degree of those effects must be investigated rather than assumed, but the possibility cannot be dismissed because existing homeowners possess valuable assets. Wealth on paper does not supply the cash necessary to pay taxes, insurance, utilities, or maintenance.

DC2050 proposes to increase residential development capacity, but additional capacity and market-rate housing production are not synonymous with housing affordability for existing Black residents. New market-rate homes may be priced beyond the reach of many Black households in the District, whose incomes are substantially lower on average than those of District households overall. The Commission should require evidence showing what portion of housing enabled by subsequent zoning actions would actually be affordable to Black households at prevailing income levels, rather than treating aggregate unit production or projected regional price effects as proof of racial equity. Protection of renters is equally important: higher neighborhood homeownership rates can mask concentrations of vulnerable renters, while renter-focused models can omit homeowner-specific risks.

The architecture, trees, historic fabric, and existing residential form of Crestwood and Sixteenth Street Heights are substantive community assets. A racial-equity assessment should not presume that their demolition or replacement becomes equitable merely because a project proposes some additional housing.

IV. OP's Displacement Model and the Omission of Property-Tax Risk

In an April 3, 2026 email discussing the Office of Planning's DC2050 displacement analysis, OP Associate Director Ryan Hand stated: "We did not include the risk for property tax increases because the District already has a number of programs to reduce property taxes to prevent displacement." This establishes a specific methodological exclusion. (Exhibit F.)

The existence of tax-relief programs does not demonstrate adequate protection of longstanding Black homeowners, fixed-income seniors, or families whose homes are their primary intergenerational assets. A meaningful racial-equity analysis of zoning actions must examine whether increased redevelopment potential could raise property assessments, taxes, insurance premiums, utility expenses, maintenance costs, and speculative acquisition pressure on longstanding homeowners, including seniors and families seeking to preserve intergenerational wealth.

At the D.C. Office of Planning's August 13, 2026 "Meet Us at the Library" event at Takoma Park Library, during the Ward 4 DC2050 discussion, Director Anita Cozart described OP's displacement-risk factors and stated that "in other parts of the city there is a higher risk of displacement because of the factors that I just named than Crestwood." She emphasized: "It's not that there's no risk of displacement." (August 13, 2026 meeting transcript, approximately 36:52.) When asked whether OP had studied Crestwood and Sixteenth Street Heights specifically, Cozart responded: "Entire city, we took census data from the entire city." (Approximately 38:13.) OP staff member Lauren Marcinkowski then clarified: "the analysis that

we have done is not at the property level. It's not at the neighborhood level," explaining that it was "looking at at a census tract." (Approximately 38:16.) Thus, OP's characterization of comparatively lower modeled displacement risk for Crestwood was based on a broader geographic analysis, not a separate neighborhood-specific assessment of the financial vulnerability of existing homeowners and renters in Crestwood and Sixteenth Street Heights.

The deficiency is not limited to OP's implementation of DC2050. Part Three of the Zoning Commission's Racial Equity Tool, "Disaggregated Data Regarding Race and Ethnicity," itself fails to require neighborhood-level demographic data or a neighborhood-specific assessment of displacement risks. It asks which planning area contains the zoning action and whether OP can use "other relevant area metrics" to compile data "specific to the area around the zoning action," but it does not mandate that OP do so. Instead, the Tool permits reliance on planning-area and other broader geographic data, even where those aggregates may mask the distinct circumstances of established neighborhoods and historically Black homeownership communities. The Tool lists demographic questions—including population, racial and ethnic composition, and median income by race—but does not require that those measures be reported at the neighborhood level or disaggregated sufficiently to identify existing homeowners' vulnerability to rising assessments, property taxes, insurance, maintenance costs, speculative pressure, or financially compelled sales. OP staff's acknowledgment at the August 13, 2026 "Meet Us at the Library" event at Takoma Park Library that the Office of Planning's DC2050 displacement-risk analysis was conducted at the census-tract level, rather than at the neighborhood or individual-property level, exposes the practical consequences of this omission in the Zoning Commission's Racial Equity Tool. The Commission should revise Part Three to require neighborhood-specific demographic and displacement-risk analysis wherever a zoning action affects an identifiable neighborhood, and should require an explanation of how any larger geographic unit used avoids masking impacts on legacy Black homeowners and other existing residents. (Zoning Commission Racial Equity Tool, Part Three, "Disaggregated Data Regarding Race and Ethnicity.")

That characterization raises an unanswered methodological question: Where is OP's separate income and household cash-flow analysis for Crestwood and Sixteenth Street Heights? At the August 13, 2026 "Meet Us at the Library" event at Takoma Park Library, OP Director Anita Cozart and staff member Lauren Marcinkowski discussed the geographic scope of OP's DC2050 displacement-risk analysis. Cozart explained that OP used census data from across the District, while Marcinkowski stated that the analysis was conducted at the census-tract level, not at the neighborhood or individual-property level. Their explanations did not identify any separate assessment of household incomes, including incomes by race, or homeowner displacement risks specifically within Crestwood and Sixteenth Street Heights before OP proposed Change Area 4.3, which OP projects could accommodate approximately 3,350 additional housing units—the largest projected increase among Ward 4's four proposed change areas. A census-tract-level risk model cannot, without additional evidence, establish the income circumstances or financial resilience of existing Black homeowners and renters in each neighborhood. What neighborhood-specific data support OP Director Cozart's characterization of comparatively lower displacement risk, and how did OP reconcile that characterization with the scale of proposed intensification?

This question is especially pressing in the current labor market. Stacy M. Brown reported in The Washington Informer on August 13, 2026 that D.C.'s estimated Black unemployment rate was

10.1% in the first quarter of 2026, compared with 6.4% unemployment District-wide and 7.2% among Black workers nationally, citing Economic Policy Institute analysis. Black workers in D.C. were estimated to be 2.6 times as likely to be unemployed as white workers. These District-wide labor-market figures do not establish the unemployment rate within Crestwood or Sixteenth Street Heights; they demonstrate why OP should not infer neighborhood-level ability to absorb housing costs from ownership status, home values, or aggregate displacement scores alone. (Stacy M. Brown, "D.C. Has Nation's Highest Unemployment Rate. For Black Workers, It Tops 10%," The Washington Informer, August 13, 2026, https://www.washingtoninformer.com/dc-black-unemployment-hits-10-percent/.)

How does the District justify a DC2050 housing-supply strategy expected to enable substantial market-rate development without first demonstrating what proportion of the resulting homes will be affordable to Black Washingtonians at actual income levels, including households experiencing unemployment or reduced earnings? OP should quantify the expected distribution of market-rate and income-restricted units, test affordability against Black household incomes, and evaluate whether development pressure and rising ownership or rental costs could indirectly displace existing Black residents. Absent that analysis, projected housing capacity alone cannot establish that the strategy will narrow racial disparities rather than risk widening them.

V. The Tool Must Independently Assess Zoning Actions After FLUM Adoption

The Racial Equity Tool asks: "Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?" It then instructs applicants to include a narrative and their own analysis. The problem is not hypothetical. OP has already proposed more intensive residential FLUM designations under DC2050, including portions of Crestwood and Sixteenth Street Heights within Change Area 4.3. In his April 3, 2026 email, OP Associate Director Ryan Hand expressly acknowledged that OP excluded the risk of property-tax increases from its displacement-risk analysis because the District has existing property-tax relief programs. Thus, OP has proposed increased residential development capacity without incorporating this specific potential source of homeowner displacement into its displacement-risk methodology. The Zoning Commission's Racial Equity Tool must not allow that omission to carry forward into subsequent zoning proceedings. It should require an independent, neighborhood-specific examination of property assessments, tax burdens, insurance and utility expenses, speculative acquisition pressure, and the cumulative financial risks to longstanding homeowners, while separately examining displacement risks and protections for existing renters.

Although a FLUM amendment does not itself rezone property or authorize demolition, its adoption has significant legal consequences. Under D.C. Code § 6-641.02, zoning regulations and amendments must not be inconsistent with the Comprehensive Plan, including its adopted Future Land Use Map. Accordingly, if the D.C. Council adopts the Office of Planning's proposed DC2050 FLUM redesignations, those designations will become part of the legally operative planning framework governing subsequent zoning decisions. The proposed intensification of Crestwood and Sixteenth Street Heights therefore cannot be dismissed as merely conceptual or deferred until individual rezoning applications arise. The Council's decision on the FLUM will have important consequences for the permissible direction of future zoning changes, making it

essential to evaluate neighborhood-specific racial-equity impacts, displacement risks, and threats to existing Black homeownership before the proposed FLUM amendments are adopted. Although the Zoning Commission's existing Racial Equity Tool already requires racial-equity analysis, consideration of Comprehensive Plan policies, demographic information, and community engagement, it does not expressly require the full range of neighborhood-specific investigations necessary to evaluate the consequences of substantial residential intensification for existing homeowners. The Commission should therefore strengthen the Tool by establishing explicit evidentiary requirements concerning financially compelled sales, displacement of existing homeowners, loss of Black intergenerational wealth, cumulative environmental and infrastructure impacts, and the financial feasibility and enforceability of proposed protections. Where essential studies are missing, the Tool should require their preparation and public disclosure before the Commission approves the zoning action. These additional requirements are especially important because, once the Council adopts a FLUM redesignation, subsequent zoning decisions must satisfy the statutory requirement that zoning not be inconsistent with the Comprehensive Plan, including its adopted FLUM. The Tool must not allow that legal constraint to become a reason for accepting inadequate evidence of racial-equity consequences.

The Office of Planning's DC2050 methodology illustrates why the Commission's Racial Equity Tool must separately evaluate indirect displacement of existing homeowners. In an August 28, 2026 email responding to my request for OP's displacement modeling or analysis, Lauren Marcinkowski directed me to OP's two-page Phase 2 publication, "What Did OP Consider When Making the Draft Future Land Use Map?" (Exhibit S). Under "Mitigating Displacement Risk," the publication identifies four indicators: the share of low-income households, the share of Black, Indigenous, and other residents of color, severe housing-cost burdens measured by rent, and renter occupancy. None expressly measures homeowner-specific pressures such as property-tax exposure, insurance and maintenance expenses, limited household cash flow, or financially compelled sales.

The Commission's Tool expressly asks whether community members will be displaced directly or indirectly. To answer that question meaningfully, the Commission should require neighborhood-specific evidence distinguishing homeowner displacement from renter displacement, disclosure of methodological limitations, and independent evaluation of cumulative financial pressures. It should also assess whether the loss of Black-owned homes would diminish intergenerational wealth, widen existing racial wealth disparities, and undermine or conflict with the District's Comprehensive Plan policies intended to prevent displacement, preserve homeownership, and reduce racial inequities. The Commission should not treat OP Director Anita Cozart's August 13, 2026 characterization of Crestwood as having comparatively lower displacement risk, based on OP's census-tract-level DC2050 analysis, as evidence that existing Black homeowners in Crestwood and Sixteenth Street Heights can afford to remain in their homes. As OP staff acknowledged at that meeting, its analysis was not conducted at the neighborhood or individual-property level. Consequently, OP's broader geographic analysis does not establish the financial vulnerability of homeowners within these particular neighborhoods or adequately assess the risk that increased property taxes, insurance costs, maintenance expenses, and redevelopment pressures could undermine existing Black homeownership and intergenerational wealth.

VI. Disaggregated Race and Ethnicity Data: Geographic Specificity Matters

The Tool states: "The Zoning Commission expects disaggregated race and ethnicity data from the Office of Planning in every racial equity analysis submission that analyzes a zoning action through a racial equity lens." This recognizes OP's role in supplying racial and ethnic evidence, rather than relying exclusively on applicants.

Yet the displacement-risk analysis OP described in connection with DC2050 and its proposed Change Area 4.3 FLUM redesignations was a citywide, census-tract-level analysis, not a separately tailored neighborhood study of Crestwood and Sixteenth Street Heights. A census tract can contain materially different residential blocks and populations; even racially disaggregated tract statistics may obscure concentrations of longstanding Black homeowners, seniors, condominium residents, and renters. (See Exhibit R, slide 17, for OP's stated displacement-risk indicators.)

The Tool should require OP, in zoning cases where neighborhood-specific effects are material, to supply appropriately disaggregated data on tenure, race, income, age, household wealth proxies, property-tax exposure, renter vulnerability, and the distribution of likely benefits and burdens. Census-tract averages should not be accepted without explanation where they conceal important differences among affected blocks or groups. OP's separate DC2050 planning-stage assessment is relevant context, but the Commission's obligation is to ensure an adequate record for the zoning action actually before it.

VII. DC2050's Racial Equity Assessment and the Need for Independent Zoning Review

In an April 16, 2026 email, OP Director Anita Cozart wrote that OP would undertake a racial equity impact assessment (REIA) of the Comprehensive Plan later that year and that it would likely consider factors I had raised. In a subsequent April 27, 2026 email, she said OP would consider my recommendations as it prepared the REIA.

On October 22, 2026, I asked five precise questions: whether the REIA would separately evaluate Change Area 4.3 and existing African American homeowners; whether it would be available before FLUM approval; whether later Small Area Plans would include neighborhood-specific REIAs; whether those later assessments could prompt reconsideration of an adopted FLUM designation; and whether homeowner financial vulnerability would be assessed.

On October 23, Director Cozart replied: "My substantive response to your request is that our team will keep in mind your questions, concerns and requests for additional information about the racial equity analysis as we continue our work on DC 2050." Her response did not answer the five questions. This correspondence is documented in Exhibit P.

The precise timing of OP's DC2050 REIA remains unconfirmed in this correspondence. For purposes of this roundtable, the lesson is that the Commission's Tool must not assume earlier planning-stage racial-equity questions were fully resolved; it should require a complete, independently assessable record when a zoning action later comes before the Commission.

VIII. Applicant-Defined Communities and the Profit Motive

The Tool asks applicants to identify the impacted communities, their defining characteristics, who might be burdened, and who might benefit. These are foundational questions, but the party seeking increased development rights may have a financial interest in the conclusions.

A developer may emphasize future residents, unit production, and projected economic gains while minimizing the interests of existing homeowners and renters, speculative pressure, demolition, loss of architectural character, or erosion of intergenerational Black wealth. This does not establish that every developer misrepresents evidence. It establishes why an applicant's analysis cannot be presumed independent or impartial.

What prevents an applicant from defining the affected community in a manner that emphasizes prospective residents who might benefit from redevelopment while minimizing the interests of existing residents who may bear its costs? How does the Commission ensure that financial incentives do not systematically influence the identification and weighting of racial-equity benefits and burdens?

The Commission should independently verify community boundaries, demographic assumptions, affordability claims, displacement analysis, and the distribution of gains and costs. It should explain how it resolves conflicts between applicant assertions and testimony from existing residents. The party that stands to profit from increased development rights should not effectively control the definition of racial equity used to justify granting those rights.

IX. ANC 4E, Community Engagement, and the Record of Opposition

The Tool emphasizes early community outreach, beginning at the inception of redevelopment planning. Although ANC 4E's DC2050 resolution was not itself a zoning application, the principle of meaningful early engagement is relevant to the planning process. Meetings alone do not establish that substantive objections were accurately characterized or addressed.

The Sixteenth Street Heights Civic Association Board adopted a May 29, 2026 resolution opposing the proposed redesignation and seeking a Small Area Plan and independent studies addressing environmental, infrastructure, transportation, racial-equity, homeowner, renter, and preservation consequences. The ANC's subsequent resolution supported the Office of Planning's proposed increase in residential density under DC2050, including more intensive land-use designations for Crestwood and Sixteenth Street Heights, while invoking housing affordability as a justification. Yet neither the resolution nor the projected additional housing capacity demonstrates that the market-rate housing ultimately built would be affordable to many Black Washingtonians. The District's 2020–2024 American Community Survey estimates place median Black household income at approximately $60,764, meaning approximately half of Black households earn less than that amount; prevailing market-rate purchase prices are beyond the reach of many such households. The resolution did not incorporate the independent studies residents requested or place each request to a separate vote. The central question remains who can actually afford the housing enabled by greater density and who receives the resulting economic benefits. The Board's action should not be portrayed as authorization for me to speak on behalf of the association; I submit this testimony individually.

For Crestwood and Sixteenth Street Heights, this requirement is particularly important because the Sixteenth Street Heights Civic Association Board requested a Small Area Plan and

independent impact studies, and I separately sought eight independent studies in my May 13, 2026 letter to Councilmember Lewis George (Exhibit O). The racial-equity review must ask what happened to those requests, not simply count the public meetings held.

The Tool should require a transparent community-engagement record identifying each requested study, the entity requesting it, the ANC or agency response, the reasons for rejecting or deferring it, and whether the requested evidence was available before the land-use position was adopted. It should separately identify the views of affected civic associations, individual homeowners, renters, and dissenting residents; an ANC resolution must not erase documented opposition or imply consensus that did not exist.

The distinction is material. A resolution supporting the general direction of DC2050 cannot fairly substitute for an evaluation of whether the proposed Moderate-Scale Residential designation would increase property-acquisition pressures, undermine Black intergenerational housing wealth, strain utilities and emergency access, affect the Rock Creek watershed, or produce housing affordable to existing Black residents. Those are questions requiring evidence, not merely expressions of support for more housing.

The chronology is critical. Before ANC 4E adopted its July 28, 2026 DC2050 resolution, residents within ANC 4E and community stakeholders had requested independent racial-equity and related impact studies, including analysis of displacement, housing affordability, Black homeownership wealth, transportation, environmental consequences, and infrastructure capacity. During the July 28, 2026 deliberations, ANC 4E Commissioner Hal Gordon characterized additional studies as “busy work” (Exhibit Q, approximately 00:50:34), despite residents’ requests for independent racial-equity, housing-affordability, displacement, environmental, and infrastructure studies before the ANC endorsed the proposed DC2050 land-use changes. He stated, “Studies is just going to continue to push, you know, just take up time of the city, waste more money, waste more people’s time” (approximately 00:54:45). These are direct quotations from the July 28 ANC 4E recording transcript, not merely my characterization.

This experience illustrates a weakness the Commission can address within its own Tool: documentation of outreach should distinguish the fact that a meeting occurred from whether residents' substantive objections were recorded, answered, and fairly characterized. For future zoning cases, the Tool should require a public accounting of relevant ANC and civic-association positions, dissenting testimony, and responses to unresolved objections.

Gordon also said, “It’s not… it shouldn’t be a machine that just puts out endless, amazing, studies” (Exhibit Q, approximately 00:52:10). I questioned why Crestwood should be treated differently from Chevy Chase, where a Small Area Plan and studies had informed neighborhood planning before the current proposed changes (Exhibit Q, approximately 01:05:06). These objections were raised in a public process in which residents were requesting evidence, not merely additional meetings.

Crucially, ANC 4E’s resolution invoked housing affordability in supporting OP’s DC2050 planning direction, yet did not require or expressly request the independent racial-equity, affordability, displacement, infrastructure, transportation, environmental, and economic-impact studies that residents and stakeholders had asked it to seek. The resolution’s invocation of affordability was therefore not accompanied by a requirement to demonstrate how much housing would be affordable to existing Black residents, how much would be market-rate, or

whether the proposed land-use changes would reduce the documented shortage of homes affordable to the lowest-income households.

Using the U.S. Census Bureau's 2020–2024 American Community Survey five-year figure of approximately $60,764 in median annual income for Black households in the District, the conventional 30-percent benchmark allows approximately $1,519 per month for housing. The relevant question is not simply whether zoning permits additional units but whether projected rents and purchase prices, including ownership carrying costs, are within reach of Black households at and below that income level. A generalized invocation of housing affordability does not answer that question. Source: U.S. Census Bureau, "Median Household Income Increased for Most Race and Hispanic Origin Groups in Majority of States Since Late 2000s" (Jan. 29, 2026), https://www.census.gov/library/stories/2026/01/household-income-by-race-and-state.html.

This sequence should inform the Zoning Commission's Racial Equity Tool: (1) residents and stakeholders submitted substantive requests for studies; (2) during ANC deliberations, a commissioner publicly characterized further studies as busy work and a waste of time and money; and (3) the resulting ANC resolution invoked affordability without requiring or requesting those studies. The Tool should require a traceable accounting of each community study request, the response, the evidence supporting any affordability claim, and the consequences of proceeding without the requested analysis.

X. Comprehensive Plan Equity Crosswalk — LU-1.1.1 and LU-2.1.1

The Comprehensive Plan Equity Crosswalk's discussion of LU-1.1.1 recognizes the importance of assessing infrastructure and utility capacity against full build-out and projected population growth. Even if Change Area 4.3 is not one of the specifically enumerated resilience-focus areas, the principle of evaluating cumulative capacity in later zoning review is directly relevant.

In a May 13, 2026 email to Councilmember Janeese Lewis George, I requested legislative intervention, a Small Area Plan, and eight independent impact studies before the proposed DC2050 Future Land Use Map redesignations for Change Area 4.3 proceeded. That correspondence is identified as Exhibit O. I received no response from the Councilmember to that request. This lack of a response is especially troubling in light of her publicly expressed support for additional residential density as a candidate and a March 27, 2026 email from Ben Rosenfeld of her office to a Crestwood resident stating that the Councilmember did not believe maintaining the status quo would protect neighborhoods in the long term. I ask why a request for evidence and protection of existing residents was left unanswered while increased density continued to be promoted as a policy direction. This is my account of the correspondence and the concern it raises; the absence of a reply does not itself establish the Councilmember's motives.

The current Comprehensive Plan recognizes not merely a diversity of residential environments, but the principle that all District residents should have an equitable opportunity to enjoy that diversity, including established low-density residential neighborhoods. Section 310.2 identifies Crestwood and Spring Valley as examples of quiet, low-density neighborhoods; Section 310.6 states that greater equity does not mean that all neighborhoods should become the same. Policy LU-2.1.1, "Variety of Neighborhood Types," calls for maintaining neighborhoods ranging

from low-density to high-density while preserving and enhancing their positive identity and design character. Policy LU-2.1.5, “Support Low-Density Neighborhoods,” also calls for supporting and maintaining established low-density neighborhoods and related zoning. These policies must be read alongside the Plan’s goals for housing growth, affordability, and racial equity; they do not create an absolute entitlement to unchanged zoning. The DC2050 Phase 2 proposed land-use change maps appear to put in place a troubling disparity: Black homeowners in Crestwood and Sixteenth Street Heights would not have the same opportunity to remain in established low-density residential neighborhoods that residents of much of Ward 3 would continue to enjoy. While substantial portions of Ward 3’s single-family residential interiors retain their Small-Scale Residential designations, historically Black homeownership communities in Ward 4 are proposed for more intensive land-use designations. The maps therefore raise a fundamental racial-equity question: does DC2050, in practice, deny Black homeowners in these Ward 4 neighborhoods an equitable opportunity to preserve the low-density residential environments that remain available to residents of much of Ward 3? The Commission’s Tool should require a transparent, evidence-based explanation of this geographic disparity, including alternatives that accommodate housing growth without disproportionately sacrificing established Black residential communities. Source: District of Columbia Comprehensive Plan, Land Use Element, §§ 310.2, 310.6; Policies LU-2.1.1 and LU-2.1.5 (2021).

XI. Comprehensive Plan Equity Crosswalk — H-2.1.I, H-2.2.B, and H-3.1.3

H-2.1.I, “Anti-Displacement Strategy,” calls for attention to different displacement pressures and housing costs, including in adjacent areas, and for anti-displacement strategies. This supports examining effects on both directly redesignated properties and neighboring residential streets.

H-3.1.3, 'Asset Development Through Homeownership,' supports paths to ownership that build and sustain equity and enable intergenerational wealth transfer, especially for low- and moderate-income households. In zoning cases affecting established homeowners, the Tool should require the Commission to consider whether the particular action supports or threatens that objective, while also addressing renters' ability to remain in their homes.

The Comprehensive Plan’s anti-displacement framework must be applied to homeowners as well as renters. H-2.1.I calls for an Anti-Displacement Strategy, while H-3.1.3 recognizes homeownership as a means of asset development and intergenerational wealth. For a zoning action affecting historically Black homeowning communities, the Tool should ask what concrete homeowner-retention measures are proposed, how redevelopment-related financial pressures will be measured, and whether those measures will protect owners who wish to remain rather than sell. Renter protections, including applicable tenant rights and relocation or return measures, must be evaluated separately and with equal seriousness.

Recent national evidence underscores why a racial-equity analysis must examine the preservation of Black household wealth, not merely changes in assessed property values. Adam Shell, writing in Kiplinger on October 20, 2026, reports, based on the Federal Reserve’s 2025 Survey of Consumer Finances, that median wealth among Black households nationally declined 25% from 2022 to 2025, reaching $36,800. The article explains that Black households were less able to participate in the gains experienced by owners of appreciating financial and housing

assets. This is national evidence, not a measurement of the effects of DC2050 in the District. (Adam Shell, "Average Net Worth by Age: Are You as Rich as Your Peers in the Latest Fed Data?," Kiplinger, updated October 20, 2026, pp. 4–5.)

Kiplinger also distinguishes net worth from liquidity and cash flow: ownership of an appreciated home can increase wealth on paper without producing the monthly cash needed to pay taxes, utilities, insurance, maintenance, and other living expenses. As the article explains, "net worth doesn't account for cash flow." A longtime Black homeowner may therefore possess valuable home equity but have limited liquid income with which to absorb rising costs. (Kiplinger, p. 10.)

This distinction raises a fundamental question under the Comprehensive Plan Equity Crosswalk and the policies addressing anti-displacement and homeownership-based asset development: Could zoning actions implementing OP's proposed DC2050 land-use intensification increase redevelopment pressure, carrying costs, or other indirect displacement risks sufficiently to induce existing Black homeowners to sell homes that otherwise would have remained in their families? If so, could those sales erode Black homeownership and opportunities for intergenerational wealth transfer, even where the sellers realize proceeds, and thereby widen rather than narrow the racial wealth divide? The Commission should require evidence addressing these questions before treating increased development capacity or rising property values as racial-equity benefits. An outcome that undermines the anti-displacement objectives of H-2.1.I or the homeownership and wealth-building objectives of H-3.1.3 would present a serious inconsistency with those Comprehensive Plan equity commitments that the Commission should expressly evaluate and resolve.

XII. Environmental Review and Cumulative Neighborhood Consequences

In April 2026 correspondence, OP Associate Director Ryan Hand stated that District law does not require environmental impact assessment for policymaking and referred to OP counsel's view that the District's environmental-impact-statement requirement does not apply to policymaking. This is OP's stated legal position, not a judicial determination resolving every potential environmental obligation. The correspondence is identified as Exhibit N.

The Commission should not confuse the absence of a mandatory environmental impact statement at a particular policy stage with evidence that cumulative impacts are immaterial. For zoning actions within its jurisdiction, the Tool should require analysis, where relevant, of traffic, parking, infrastructure and utility capacity, tree canopy, stormwater, emergency access, and cumulative effects alongside reasonably foreseeable nearby development. Where necessary studies do not exist, the Commission should require independent, neighborhood-specific analysis rather than relying on the absence of existing agency evidence to justify approval.

The Comprehensive Plan also requires serious attention to environmental quality, public facilities, transportation, infrastructure, and neighborhood impacts. LU-1.1.1 makes the adequacy of public infrastructure and utilities relevant to the level and location of growth; LU-2.1.1 addresses neighborhood identity and character. The Tool should require the applicant and OP to identify applicable Comprehensive Plan directives, the studies needed to evaluate capacity and cumulative effects, and any material gaps in traffic, parking, stormwater, tree-canopy, watershed, utility, school, and public-service evidence. Whether a formal

environmental impact statement is legally required is a distinct question from whether the Commission has enough evidence to evaluate a zoning action's environmental and racial-equity consequences.

Can the Zoning Commission's Racial Equity Tool Remedy Inequities That Were Not Examined Before FLUM Adoption?

A fundamental question arises concerning the effectiveness of the Zoning Commission's Racial Equity Tool: Can the Tool meaningfully prevent or remedy racial and environmental inequities if the District adopts substantial Future Land Use Map (FLUM) redesignations without first conducting neighborhood-specific environmental studies, environmental justice assessments, and racial equity impact assessments (REIAs)?

This concern is especially significant where the Office of Planning maintains that an environmental impact statement is not required at the policy or Future Land Use Map (FLUM) amendment stage, while its DC2050 displacement-risk analysis does not specifically evaluate the financial vulnerability and displacement risks of existing homeowners. As OP acknowledged in its April 2026 correspondence and August 13, 2026 public discussion, its analysis does not provide a neighborhood- or property-level assessment of the risks facing homeowners in Crestwood and Sixteenth Street Heights.

These omissions raise a fundamental question: If the District does not adequately evaluate environmental impacts, environmental justice, and the potential displacement of existing homeowners before adopting substantial FLUM redesignations, how can the Zoning Commission's Racial Equity Tool subsequently identify and remedy inequities that may already be embedded in the adopted planning framework?

The Commission's Racial Equity Tool cannot be presumed capable of correcting every inequity embedded in an earlier planning decision. Under D.C. Code § 6-641.02, zoning regulations and amendments must not be inconsistent with the adopted Comprehensive Plan. Although that requirement does not compel the Commission to approve every density increase contemplated by the FLUM, it underscores why racial-equity and environmental-justice analysis should occur before consequential land-use designations are adopted.

The Commission should therefore expressly examine whether its Tool is capable of identifying and meaningfully addressing cumulative racial and environmental harms that were not evaluated at the FLUM stage. It should also identify which harms remain within its authority to prevent through subsequent zoning decisions and which may require reconsideration of the underlying planning policies by the Office of Planning and D.C. Council.

The Commission should therefore require independent, neighborhood-specific environmental, infrastructure, and racial equity impact assessments, including explicit examination of homeowner displacement, financially compelled sales, and the potential loss of Black intergenerational wealth, before approving zoning actions implementing these redesignations. These assessments should examine cumulative impacts, including the combined effects of multiple rezonings, and should not be limited to existing agency studies or the immediate effects of individual applications. Where essential studies have not been conducted, their absence should be identified as a material deficiency requiring further investigation before approval.

The central question is whether racial equity can be meaningfully achieved through a review process that begins only after major land-use policy decisions have already been made without the environmental, environmental-justice, and racial-equity evidence necessary to evaluate their consequences. Strengthening the Zoning Commission's Tool is essential, but it cannot substitute for meaningful racial-equity and environmental review at the earlier Comprehensive Plan and FLUM decision-making stages.

Rock Creek Tennis Center, the proposed long-term National Park Service lease and redevelopment, and the District's financial support for the Mubadala DC Open present a concrete example of why cumulative review matters. In June 2026, the D.C. Council approved approximately $9.6 million in capital and PayGo support for improvements to the federally owned tennis facility, notwithstanding that the District does not own the land. Council and NPS records concerning the proposed lease, redevelopment, tournament operations, and funding should be considered together when evaluating foreseeable effects on surrounding neighborhoods. These are not merely unrelated abstract planning questions: the federal lease and redevelopment proposal, District funding, tournament operations, and nearby land-use intensification may affect overlapping roads, parking, residential streets, utilities, trees, and the Rock Creek watershed.

These circumstances also raise the question of unlawful segmentation under the National Environmental Policy Act (NEPA): whether federal decision-makers are considering connected or reasonably foreseeable actions in artificially separate pieces rather than evaluating the environmental consequences that must legally be considered together. The existence of separate lease, funding, and planning processes does not by itself prove a NEPA violation; nor does District funding alone establish that DC2050 is a federal action. Nevertheless, NPS should explain the scope of its federal environmental review, the relationship among the proposed lease, redevelopment and tournament-related activities, and whether connected actions and cumulative effects have been appropriately addressed. The 1997 Record of Decision's tournament, parking, and neighborhood-mitigation conditions are also relevant to assessing foreseeable impacts and whether proposed operations remain within previously evaluated limits.

This issue directly implicates the Zoning Commission's Racial Equity Tool even where NEPA compliance is ultimately for NPS and, if necessary, a reviewing court. When the Commission evaluates a zoning action affecting Crestwood, Sixteenth Street Heights, or another community exposed to overlapping development pressures, the Tool should require disclosure of reasonably foreseeable nearby projects and publicly funded activities, identify which agency has studied their combined impacts, and require neighborhood-specific assessment of traffic, parking spillover, stormwater, environmental burdens, displacement risks, and effects on Black homeowners and renters. Agency boundaries and project-by-project review must not become a reason to disregard cumulative racial-equity consequences.

XIII. Affordability, Housing Production, and Existing Residents

DC2050 seeks to enable additional housing production, but increasing the number of homes that can be built does not ensure that the homes produced will be affordable to existing residents. Much of the housing that private development may deliver without enforceable affordability requirements could be offered at market rates that the average Black household in

D.C. cannot afford. The Commission should distinguish gross unit production, market-rate production, income-restricted production, and homes demonstrably affordable and available to Black households and other lower-income residents. In subsequent zoning cases, applicants should substantiate affordability claims with projected rents and purchase prices, applicable income thresholds, and evidence of who can actually access the resulting housing. General claims that additional supply stabilizes regional prices do not establish that new housing will be affordable to low-income Black households or that existing residents will avoid displacement.

Evidence from OP officials demonstrates why price stabilization must not be equated with affordability. At the May 12, 2026 ANC 4E meeting, OP Senior Planner and DC2050 Project Manager Nick Kushner explained that OP had identified a housing-capacity goal of approximately 460,000 households based on studies it attributed to the Office of the Chief Financial Officer. He described the aim as "to stabilize prices, meaning prices wouldn't continue to rise," and added, "with inflation, that would actually lower the cost of housing." (May 12, 2026 ANC 4E meeting transcript, approximately 00:40–00:43.) But he also acknowledged that mapped capacity does not guarantee construction: "That doesn't mean, that that is necessarily what will get built, that is a capacity that is there." He further stated, "We also know that this map is not showing a significant amount of dedicated affordable housing." (Id., approximately 00:43–00:46.) These statements describe a proposed capacity-based theory and its limitations; they do not demonstrate that DC2050 will actually lower nominal or inflation-adjusted prices or produce homes affordable to lower-income Black Washingtonians.

At the D.C. Office of Planning's August 13, 2026 "Meet Us at the Library" event at Takoma Park Library, Director Anita Cozart stated that additional housing supply can "at least stabilize the housing costs," while acknowledging that "[t]he research is still there and developing about whether or not it drives them down." (August 13, 2026 Takoma Park Library transcript.) Neither Cozart's statement nor Kushner's May 12 presentation establishes that the proposed DC2050 changes will actually produce price declines, whether nominal or inflation-adjusted. Stabilizing prices that already exclude many Black households is not the same as creating homes they can afford. Even a demonstrated inflation-adjusted decline would not, by itself, establish that housing will be accessible to households with the lowest incomes. The Tool must demand the actual projected rents, purchase prices, income bands served, enforceable affordability commitments, and demonstrated net production of deeply affordable homes in the affected area.

Nor is the central issue limited to whether redevelopment produces affordable units. Existing homes, residential architecture, mature trees, neighborhood continuity, and Black family wealth are themselves important racial-equity interests. The Commission should not treat them as expendable simply because an applicant offers a projection of additional housing supply.

OP's May 12, 2026 presentation to ANC 4E projected approximately 9,500 potential additional households in Ward 4 by 2050 but approximately 1,300 dedicated affordable units (including Inclusionary Zoning and D.C. Housing Authority redevelopment). These are different measures, not guaranteed production totals. OP's presentation further cautioned that other affordable-housing programs are budget-dependent and not directly tied to the FLUM. At approximately 00:45:25 of the May 12 meeting, Nick Kushner stated: "We also know that this map is not showing a significant amount of dedicated affordable housing." At approximately 00:43:27, he said of the mapped development capacity: "That doesn't mean, that that is necessarily what

will get built, that is a capacity that is there." These admissions reinforce the need for the Tool to measure housing affordable to the lowest-income residents, not merely potential construction capacity or stabilized market prices.

XIII-A. The Affordable-Housing Gap, Black Household Income, and Who Benefits from Market-Rate Upzoning

The District's housing problem must be evaluated by income level and actual affordability, not merely by the aggregate number of housing units permitted under a Future Land Use Map. The shortage of homes affordable and available to households with the lowest incomes is distinct from the amount of market-rate development capacity. A projection that more market-rate units may eventually moderate or stabilize rents does not establish that the District will close its existing gap in deeply affordable housing. The Commission should demand a quantified analysis of the affordable-housing shortage by income band, including units affordable and available to extremely low-income and very low-income households, and distinguish this need from generalized housing-production targets. (See Exhibit R, slide 13, for OP's citywide housing-capacity projections.)

According to the U.S. Census Bureau's 2020–2024 American Community Survey five-year estimates, the median annual household income for Black households in the District of Columbia was approximately $60,764, compared with $170,201 for non-Hispanic White households. This is a median, not an arithmetic mean. At $60,764 per year, the conventional 30-percent-of-gross-income housing-cost benchmark is approximately $1,519 per month. This is a screening benchmark, not a guarantee that a particular household can afford that amount. Source: U.S. Census Bureau, "Median Household Income Increased for Most Race and Hispanic Origin Groups in Majority of States Since Late 2000s" (Jan. 29, 2026), https://www.census.gov/library/stories/2026/01/household-income-by-race-and-state.html.

What share of the market-rate rental apartments, condominiums, detached houses, semi-detached houses, rowhouses, townhouses, and other residential housing types expected under DC2050 will be affordable to a Black household earning $60,764 per year? What share will be affordable to Black households earning less than that median? For a purchase, the analysis must include mortgage principal and interest, property taxes, insurance, condominium or homeowners' association charges, and other mandatory carrying costs; for rentals, it must include utilities and fees. The Commission should require projected rent and sale-price ranges, household-income distributions, the applicable affordability standards, and the number of units subject to binding long-term income restrictions. Without those comparisons, the claim that new housing advances racial equity remains untested. (See Exhibit R, slide 9, for OP's descriptions of Small-Scale and Moderate-Scale Residential building types.)

Who is the new housing for? Why are historically Black residential and homeownership corridors—including proposed Change Area 4.3 in Crestwood and Sixteenth Street Heights—being asked to absorb additional development intensity, potential land speculation, infrastructure demands, tree-canopy loss, and risks to neighborhood continuity if OP has not shown that the resulting market-rate units will be financially accessible to the Black residents whose communities experience those burdens? This question is particularly salient where established single-family residential interiors in portions of Ward 3 retain Small-Scale Residential designations. The racial-equity analysis should compare the distribution of

redevelopment burdens and housing benefits across wards and neighborhoods rather than presume that all increased capacity has equivalent consequences.

At the May 12, 2026 ANC 4E meeting, OP Senior Planner and DC2050 Project Manager Nick Kushner stated, "We also know that this map is not showing a significant amount of dedicated affordable housing." OP's May 12 presentation (Exhibit R, slide 19) projected capacity for approximately 9,500 additional households in Ward 4 but approximately 1,300 dedicated affordable units; these are different measures and neither figure guarantees completed homes. Kushner also cautioned that capacity is not the same as actual construction. At the D.C. Office of Planning's August 13, 2026 "Meet Us at the Library" event at Takoma Park Library, Director Anita Cozart said increased supply could "at least stabilize the housing costs," while acknowledging uncertainty about whether it would drive prices down. Stabilization of prices that are already unaffordable does not itself make housing accessible to households excluded by current market prices.

The Tool should therefore require a neighborhood-specific housing-gap analysis showing (a) existing affordable and available units by household-income band; (b) the shortfall relative to households in each band; (c) the number of proposed market-rate and legally income-restricted units; (d) expected rents and total purchase costs compared with Black household incomes; (e) whether any projected units would actually close the lowest-income affordability gap; (f) the anticipated effects on existing Black homeowners' property values, carrying costs, and intergenerational assets; and (g) the enforceable anti-displacement measures that would accompany zoning changes. Housing vouchers or theoretical eligibility should not be treated as proof that units will be produced and available to the affected households.

The racial-equity inquiry cannot end with how many homes could be built. It must determine who can afford those homes, who benefits financially, who bears the neighborhood and environmental costs, and why increased development rights are being concentrated in particular historically Black residential corridors. These questions should be answered with evidence before claims of racial-equity benefits are credited in a zoning case.

XIV. Recommendations for the Zoning Commission's Tool

I request that the Commission: (1) require the Tool to identify what planning-stage racial-equity analysis is available, what questions remain unanswered, and why those gaps matter to the zoning action; (2) require OP and applicants to provide neighborhood-specific evidence for affected homeowners and renters, including indirect financial pressures; (3) independently scrutinize applicant-defined communities and claimed benefits; (4) require appropriate geographic comparisons when material to an equity claim; (5) require substantive responses to ANC, civic-association, and resident objections in the zoning record; (6) evaluate neighborhood character, architecture, tree canopy, infrastructure, and cumulative impacts; (7) require meaningful tenant protections and relocation-and-return plans where applicable; and (8) explain how adverse racial-equity evidence affects the Commission's evaluation, permissible conditions, or disposition of the zoning application.

The Commission's Tool should function as an independent safeguard capable of affecting zoning decisions—not a retrospective justification for increased development rights. I urge the

Commission to require a sufficiently specific and independently verifiable record before finding a zoning action not inconsistent with the Comprehensive Plan through a racial-equity lens.

XV. Proposed Mandatory Improvements to the Racial Equity Tool

The Commission should require OP and applicants to complete the Tool as a standardized, publicly available form, with each applicable question answered, evidence identified, and unanswered questions clearly disclosed. Minimum community-engagement requirements should include timely notice, substantive responses to objections, and an explanation of whether proposals changed as a result. Applications that do not satisfy lawful filing and engagement requirements should be deferred until deficiencies are corrected.

OP should supply the Comprehensive Plan's Anti-Displacement Strategy, a housing-gap analysis distinguishing housing supply from housing affordable to low-income residents, and neighborhood-specific, race-, tenure-, income-, and age-disaggregated evidence. Where tenants may be affected, applicants should document compliance with tenant protections and develop meaningful relocation-and-return plans with residents. Applicants should identify measurable, enforceable racial-equity measures, such as family-sized affordable units, deeper affordability, and community benefits agreements reflecting affected residents' priorities.

How does the Tool ensure that mitigation measures respond to the actual housing characteristics and racial-equity vulnerabilities of the affected neighborhood rather than relying on generic benefits unrelated to the zoning action's impacts?

XV-A. Specific Questions in the 2023 Racial Equity Tool — Required Answers, Evidence, and Consequences

1. Who is the affected community, and who defines it?

The Tool asks applicants to describe the community and identify those who may benefit or be burdened. Who verifies the boundaries and population selected by a developer with a financial interest in approval? Will the Commission require separate identification of existing Black homeowners, senior homeowners, condominium owners, renters, heirs, and prospective residents? A future population cannot simply replace the existing community in the equity analysis.

2. What constitutes meaningful community engagement?

The Tool asks about engagement, but a meeting, presentation, or ANC resolution is not evidence that residents agreed with the proposal. What questions were raised, which objections remained unanswered, what alternative was considered, and what changed as a result? Will the Commission require a response matrix addressing opposition from civic associations, residents, and ANC commissioners, rather than equating outreach with consent?

3. What does disaggregated racial data actually reveal?

The Tool expressly expects disaggregated race and ethnicity data from OP. Will it require tenure, age, income, household wealth, and location-specific comparisons sufficient to distinguish Crestwood and Sixteenth Street Heights from larger census tracts? How can an applicant demonstrate equity if the data mask concentrations of longstanding Black homeowners or vulnerable renters?

4. "Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?"

This is an express question in the Tool, but what must an applicant actually investigate to answer it? Does the required analysis encompass redevelopment-induced land-value changes, property assessments and taxes, insurance, maintenance and utility costs, speculative purchase pressure, harassment or loss of rental housing, and loss of intergenerational homeownership? OP's April 3, 2026 email confirmed that property-tax-increase risk was excluded from its DC2050 displacement analysis. A bare conclusion of "no displacement" should not satisfy this question.

5. What housing benefits are actually affordable, and to whom?

When the Tool asks about benefits and housing outcomes, will the Commission distinguish theoretical capacity, units actually likely to be built, market-rate units, income-restricted units, and homes affordable to the lowest-income households? Will it require a comparison with the incomes of Black households already living in or excluded from the affected neighborhood? Price stabilization alone does not answer this question.

6. What Comprehensive Plan policies and studies govern the decision?

The Tool must identify not only policies said to support additional housing but also policies requiring infrastructure-capacity analysis, protection of neighborhood character, anti-displacement strategies, environmental review where legally applicable, and the preservation and development of homeownership wealth. Will the applicant identify conflicting policies, required studies, data gaps, and the measures that would resolve them?

7. What happens if the evidence shows racial harm?

If analysis reveals substantial unmitigated displacement risk, unaffordable housing, inadequate infrastructure, or significant environmental burdens, can the Commission require changes, enforceable conditions, additional study, or denial when warranted under the governing zoning standards? An equity tool that records adverse evidence without explaining its effect on the decision is insufficient.

XVI. Land Values, Harassment, Impervious Surfaces, Utility Costs, and Indirect Displacement

The 2023 Racial Equity Tool asks about direct and indirect displacement, demographic conditions, housing impacts, environmental conditions, and Comprehensive Plan racial-equity policies. But it does not expressly require OP or applicants to analyze several specific mechanisms of indirect displacement: increases in redevelopment-related land values, property carrying costs, pressure on homeowners to sell, harassment of renters to vacate, increased impervious surfaces, and utility charges.

A Small-Scale to Moderate-Scale Residential FLUM redesignation could signal greater future development potential and increase what purchasers are willing to pay for land, although it does not itself rezone property or compel a sale. A rise in market value may benefit owners who wish to sell, but may not help longtime homeowners who wish to remain and must pay taxes, insurance, utilities, and maintenance from limited cash income. The Tool should require evaluation of assessment changes, property-tax relief effectiveness, redevelopment pressure, and cumulative burdens on Black homeowners and seniors.

Applicants and OP should also examine persistent unsolicited purchase solicitations or coercive pressure on homeowners and redevelopment-related harassment, pressure to vacate, or displacement of apartment tenants. Not every purchase offer is harassment, and potential risk is not proof of unlawful conduct; nonetheless, these are distinct mechanisms that should be investigated. Renters may also face higher rents and utility expenses, including costs passed through by landlords.

A racial-equity assessment must distinguish home equity from available cash flow and evaluate whether redevelopment-related cost pressures could cause existing Black homeowners to sell involuntarily in economic terms, even without formal eviction or condemnation. It must also examine whether the resulting loss of ownership and potential intergenerational transfer of family homes could diminish Black wealth, rather than simply count higher sales prices as a benefit. (See Adam Shell, "Are You Rich? The Average Net Worth by Age Just Got an Update," Kiplinger, updated October 20, 2026, pp. 4 and 10; Comprehensive Plan Equity Crosswalk, H-2.1.I and H-3.1.3.)

More roofs, pavement, driveways, and other impervious surfaces may affect runoff and stormwater infrastructure. DC Water's Clean Rivers Impervious Area Charge and the District's Stormwater Fee relate to impervious coverage. Additional paving on a neighboring lot does not automatically raise another homeowner's individual assessment; the Tool should nevertheless ask whether redevelopment could increase charges on affected properties, lead to costs passed through to renters, or generate cumulative infrastructure expenses. Any analysis must account for applicable stormwater rules, rate-setting, and measurement timing.

The Tool should expressly require the applicant and OP, as appropriate, to answer: (1) Could the zoning action increase land values and redevelopment incentives? (2) Could it increase assessments, carrying costs, rent, or utility expenses? (3) Could it generate acquisition pressure or tenant harassment, and what safeguards apply? (4) Could impervious coverage, runoff, and stormwater-related costs change? (5) How would these cumulative effects differ by race, age, income, and tenure? (6) Which Comprehensive Plan racial-equity and anti-displacement policies might not be advanced?

These questions should be required in the racial-equity analysis of subsequent zoning actions, even when the applicable FLUM designation has already been adopted. The absence of forced sales or formal evictions is not evidence that indirect displacement risks have been adequately addressed.

XVII. ANC 4E May 12 Statements and the Missing Indirect-Displacement Inquiry

At ANC 4E's May 12, 2026 meeting, Commissioner Hal Gordon characterized upzoning as 'expanding homeowners' property rights' and emphasized that 'no one's going to be forced' to move or change. OP project manager Nick Kushner similarly stated, 'nobody's forcing you to sell your home,' while explaining that OP itself, as well as developers, could initiate later zoning changes. (May 12 ANC 4E meeting transcript, approximately pp. 38 and 43.)

These assurances minimized indirect homeowner-displacement concerns by treating the absence of a compulsory sale as the answer to a different question: whether changing development potential could produce economic pressures that make remaining difficult. The

Commission's Tool expressly distinguishes direct and indirect displacement, yet lacks mandatory inquiries into the specific financial and coercive mechanisms described above.

XVIII. Unequal Small Area Planning, Larger Planning Geographies, and Masked Effects on Black Homeowners

The D.C. Office of Planning's June 6, 2026 presentation, "DC 2050 and Small Area Planning — Roundtable Discussions" (Exhibit A), acknowledges a structural inequity in the distribution of neighborhood-specific planning. On Slide 8, OP states: "Currently, small area plans are developed inconsistently, with varying scopes, processes, and boundaries." It observes that many plans are 15–20 years old and significant portions of the District lack up-to-date community planning guidance. OP says it is exploring a more equitable and predictable approach while also proposing boundaries that group neighborhoods into larger planning areas. This is an acknowledgment of inconsistent planning coverage, not a finding that any particular proposed boundary is equitable.

The timing of these plans creates an additional inequity. Chevy Chase received a localized, Council-adopted Small Area Plan in 2022, before DC2050. That plan provides neighborhood-specific historical, physical, demographic, and policy information that can be considered in later Comprehensive Plan and zoning reviews. Crestwood, which contains a historic Black homeownership community associated with the Black Gold Coast, has no comparable localized adopted Small Area Plan. The DC2050 FLUM could be approved and shape subsequent zoning decisions years before Crestwood receives a future plan. A later plan cannot fully substitute for studies and community influence needed before the underlying land-use choices are made.

Nor is a future larger-area SAP necessarily equivalent to the Chevy Chase neighborhood plan. Crestwood and Sixteenth Street Heights share important relationships to Rock Creek Park, while both warrant neighborhood-specific examination of architectural and cultural resources, longstanding Black homeownership, renter stability, environmental conditions, and the impacts of proposed residential intensification. Why did Chevy Chase receive a dedicated Small Area Plan and associated neighborhood-specific planning analysis, while Crestwood and Sixteenth Street Heights did not receive comparable planning and independent impact studies before the Office of Planning proposed substantial changes to their residential land-use designations? Instead, why were Crestwood and Sixteenth Street Heights grouped with other neighborhoods within a proposed, larger Small Area Plan planning area, without first evaluating the distinct environmental, architectural, historic preservation, housing affordability, and racial-equity impacts on their existing communities? OP's Slide 7 identifies existing-conditions analysis, specialized studies, stakeholder-informed vision, and implementation strategies as elements of Small Area Planning. Its Slide 10 expressly asks: "When planning for larger geographies, what are some considerations to ensure that small area plans still reflect unique neighborhood needs?" The Commission should insist on answers before relying on a generalized planning-area analysis.

The geographic issue intersects directly with the 2023 Zoning Commission Racial Equity Tool. Its references to a "planning area" do not necessarily identify the same boundaries as OP's proposed future Small Area Plans; the two could overlap, but they must not be treated as automatically identical. In either case, an analysis aggregated across a broad planning area may conceal the distinct impacts on Black homeowners in Crestwood, including threats to

intergenerational housing wealth, as well as impacts on renters in Sixteenth Street Heights, including Black renters who may face rising rents, redevelopment pressures, housing instability, or displacement. Differences in racial composition, homeownership, household income, age, land values, property assessments, redevelopment pressure, and park adjacency can be lost in a larger-area average. An apparently favorable aggregate finding does not establish that Black homeowners in Crestwood will avoid indirect displacement or loss of intergenerational wealth.

This inequity has substantive Comprehensive Plan implications. Neighborhood-specific review must assess the infrastructure and utility capacity concerns associated with LU-1.1.1; neighborhood identity, physical character, and environmental context under LU-2.1.1; the Anti-Displacement Strategy contemplated by H-2.1.I; and the preservation and development of homeownership equity under H-3.1.3. For Crestwood, the record should examine tree canopy, runoff and stormwater, traffic, parking, utility capacity, proximity to Rock Creek Park, cumulative development effects, property assessments and carrying costs, speculative purchase pressure, and concrete protections for existing Black homeowners. The existence of a broader planning process is not evidence that these localized studies have been performed.

The Tool should therefore require (1) disclosure of the precise racial-equity planning-area boundaries and why they were selected; (2) a separate Crestwood-level analysis of Black homeowners and other affected residents, rather than only aggregated planning-area data; (3) identification of whether an adopted localized SAP exists and, if not, which neighborhood-specific studies are missing; (4) evaluation of whether decisions are being made before promised SAPs and anti-displacement protections; (5) comparison of the treatment of communities with previously adopted SAPs, including Chevy Chase, and communities awaiting larger future plans; and (6) enforceable, evidence-based mitigation or modification of zoning proposals when unaddressed racial or environmental impacts are identified.

Source: OP, "DC 2050 and Small Area Planning — Roundtable Discussions," June 6, 2026, Slides 6–8 and 10 (Exhibit A). The presentation does not itself identify the precise proposed SAP boundary around Crestwood or a firm adoption date; the boundary should be documented through OP's separate proposed planning-area map.

XVIII-B. Councilmember Lewis George's March 27, 2026 Ward 4 Dispatch and Contemporaneous Crestwood Correspondence

On March 27, 2026, Councilmember Janeese Lewis George wrote in her Ward 4 Dispatch, under "DC 2050 Comprehensive Plan: Share Your Feedback": "As we continue to assess this plan and what it means for Ward 4, I encourage you to review the map and share your feedback with the Office of Planning at DC2050@dc.gov." She added: "Community input is a critical part of this process, and your voice can help ensure the final plan better reflects our shared priorities." The newsletter thus expressly characterized the Councilmember's assessment of DC2050 as ongoing. (Ward 4 Dispatch, March 27, 2026, p. 2.)

On that same date, Ben Rosenfeld of Councilmember Lewis George's office wrote to a Crestwood resident: "With respect to Crestwood, Councilmember Lewis George believes that any potential rezoning should be thoughtful, balanced, and guided by community input. At the same time, she does not believe that maintaining the status quo will protect neighborhoods in

the long-term. Her approach is to pursue solutions and investments that ensure infrastructure and public services keep pace with any changes."

Read together, these contemporaneous statements raise a legitimate evidentiary question. While the public Dispatch said her office was continuing to assess DC2050 for its impact on Ward 4, the Crestwood-specific communication already expressed skepticism that retaining existing conditions would protect neighborhoods. Neither statement supplies a neighborhood-specific assessment demonstrating that proposed Moderate-Scale Residential changes would preserve longstanding Black homeownership, protect tenants, maintain neighborhood character, or ensure that infrastructure investments would precede added development demands.

The May 13, 2026 request to Councilmember Lewis George (Exhibit O) consequently sought legislative intervention and a localized Small Area Plan supported by eight independent studies before Change Area 4.3 FLUM changes proceeded. I did not receive a response to that request. The March 27 correspondence should be considered in that sequence: an invitation to community input and assurances concerning infrastructure cannot replace studies of infrastructure capacity, environmental and stormwater effects, transportation, historic resources, homeowner and renter displacement, and the intergenerational assets of Black families.

In particular, the Zoning Commission should revise its Racial Equity Tool to require OP and zoning applicants to identify and respond specifically to community objections and evidence of potential adverse racial-equity impacts, including findings from neighborhood-specific displacement studies, demographic and economic analyses, environmental and infrastructure assessments, and testimony from affected residents. The Tool should require an explanation of how this evidence will inform the Commission's consideration of a proposed zoning action, including whether the proposal should be modified, additional safeguards should be required, or approval should be withheld pending further analysis.

Where OP or an applicant proposes affordable housing, homeowner assistance, tenant protections, infrastructure improvements, or other measures to address identified harms, the Tool should require disclosure of who will be responsible for implementing those measures, whether adequate financial resources have been committed, when the measures will take effect, and whether they will be legally enforceable. The Commission should not rely on speculative future programs or generalized assurances of displacement prevention when evaluating the racial-equity consequences of a proposed zoning action.

The Zoning Commission's Racial Equity Tool should also require a meaningful assessment of whether proposed anti-displacement protections and neighborhood investments are financially feasible. Where OP or a zoning applicant relies on affordable-housing assistance, property-tax relief, homeowner preservation programs, tenant protections, infrastructure improvements, or other mitigation measures to address identified racial-equity harms, the Tool should require identification of the responsible funding source, the estimated cost, whether funds have actually been appropriated or otherwise legally committed, the implementation timetable, and the means by which the promised measures will be enforced.

This requirement is particularly important given the District's current fiscal pressures, including federal workforce reductions and their effects on employment and District revenues. These

circumstances raise a fundamental question: How will the District finance additional anti-displacement protections and infrastructure obligations associated with proposed residential intensification when existing budgetary resources are already under pressure? If those protections depend on future appropriations, uncertain revenue growth, or funding that has not been committed, the Tool should require that uncertainty to be disclosed and evaluated rather than treating the proposed protections as assured.

The Commission should distinguish between mitigation measures that are presently funded and enforceable and those that remain aspirational. It should also examine whether the financial burden of accommodating additional development could fall on existing residents through increased housing-related costs or inadequate public infrastructure. A racial-equity assessment cannot meaningfully rely on promised protections without determining whether those protections can realistically be delivered.

Source: D.C. Office of the Chief Financial Officer, September 2026 Revenue Estimates for FY2026–FY2030 (September 30, 2026), https://ora-cfo.dc.gov/page/quarterly-revenue-estimates.

Sources: Councilmember Janeese Lewis George, "Ward 4 Dispatch: DC 2050, Tax Resources, and Fighting High Utility Bills," March 27, 2026, p. 2; email correspondence from Ben Rosenfeld to a Crestwood resident, March 27, 2026; Exhibit O, May 13, 2026 letter requesting independent studies.

XVIII-C. Washington's History of Gentrification, Newcomers, and the Protection of Existing Residents

Why is the District proposing substantial residential intensification in Ward 4 neighborhoods containing historically Black homeownership communities, including Crestwood and Sixteenth Street Heights, while retaining Small-Scale Residential designations across substantial portions of the established single-family residential interiors of Ward 3?

Under OP's DC2050 proposal, Change Area 4.3 is projected to accommodate approximately 3,350 additional housing units—the largest projected increase among Ward 4's four proposed change areas. OP should explain the comparative criteria for these designations and their effects on existing homeowners and renters.

In their April 15, 2022 POLITICO article, "Washington Was an Icon of Black Political Power. Then Came Gentrification," Steven Overly, Delece Smith-Barrow, Katy O'Donnell, and Ming Li documented the transformation of Washington's historically Black communities and the departure of Black middle-class families. The article quoted Myron Orfield, director of the Institute on Metropolitan Opportunity at the University of Minnesota Law School: "D.C. has the highest level of displacement in the country." This was his assessment at the time of publication, not a verified 2026 ranking.

The article also reported that a 2019 National Community Reinvestment Coalition study found that D.C. had the highest "intensity" of gentrification among U.S. cities between 2000 and 2013. A follow-up study ranked the District 13th in a later period. These different periods must not be conflated.

Former Mayor Sharon Pratt observed: "It's frustrating that we even talk about the housing policy when you have an underlying wealth divide of such enormous proportions." Documentary

filmmaker Sam George warned: “When the housing becomes unaffordable, new people come in.” He explained that changes in who patronizes longstanding neighborhood businesses can compound cultural loss.

These observations raise a fundamental question: Is DC2050 being designed primarily to accommodate newcomers and expand redevelopment opportunities, rather than to protect and improve housing security for existing residents, including legacy Black homeowners?

Increasing permitted residential density does not address the fundamental racial wealth disparities that prevent many existing Black District residents from affording newly constructed housing. Nor does authorizing additional development establish that the resulting homes will be affordable to those residents or that existing Black homeowners will be able to retain and pass down their properties. Property-tax relief programs and other limited mitigation measures are not substitutes for a land-use strategy that protects existing Black homeownership, preserves intergenerational wealth, and provides housing genuinely affordable to Black Washingtonians. The District must confront the more fundamental question of whether DC2050’s proposed residential intensification will benefit the people who already live in these communities or primarily create housing and investment opportunities for newcomers and developers.

For existing homeowners, the racial-equity question includes whether families can retain their homes, withstand speculative acquisition pressures and increasing ownership costs, and transfer their homes to succeeding generations. For existing renters, it includes whether the plan provides genuinely affordable housing and meaningful protection against displacement. Displacement prevention should be evaluated before residential intensification is authorized, rather than deferred until after redevelopment pressures increase.

Why has OP proposed Small Area Planning Area 14 in a manner that separates some historically and architecturally connected communities documented in the District’s Ward 4 Heritage Guide? What criteria explain those boundaries? Did the District’s preferred redevelopment of the Rock Creek Tennis Center influence the formation, boundaries, or planning objectives of Area 14?

An additional concern is the apparent omission of Rock Creek Park from the identification of significant assets or features associated with proposed Small Area Planning Area 14, notwithstanding that Crestwood and Sixteenth Street Heights directly abut the park. By contrast, Rock Creek Park is identified in connection with proposed Small Area Planning Area 17, which encompasses portions of Ward 3. Why is this major federal park recognized as a planning asset for Area 17 but apparently omitted from the corresponding discussion of Area 14? What criteria justify that distinction?

Source: D.C. Office of Planning, Small Area Planning — DC2050 StoryMaps Collection, proposed Small Area Planning Areas 14 and 17.

This omission is particularly troubling because residents and stakeholders in Crestwood and Sixteenth Street Heights have expressed concerns about the proposed redevelopment and long-term leasing of the Rock Creek Tennis Center within Rock Creek Park, including potential effects on traffic, parking, environmental resources, public access, and neighborhood quality of life. These communities have a direct and substantial interest in decisions affecting the park, regardless of whether the District’s proposed planning boundaries place them in the same planning area as neighboring Ward 3 communities.

The Commission should therefore ask whether the proposed planning geography adequately recognizes the relationship between these Ward 4 neighborhoods and Rock Creek Park, whether affected residents will receive meaningful opportunities to participate in planning decisions concerning the park and the tennis center inside that park, and whether the planning-area boundaries could obscure cumulative impacts on adjoining communities.

These are questions requiring disclosure and examination, not assertions that the proposed tennis center redevelopment determined the boundaries of Area 14.

The Zoning Commission's Racial Equity Tool should require an assessment comparing anticipated benefits to newcomers with consequences for existing residents of all racial and ethnic backgrounds; housing affordability relative to actual household incomes, including incomes disaggregated by race; retention and inheritance of homes, with particular attention to longstanding Black homeownership and intergenerational wealth; financially compelled sales; and who captures the wealth generated by redevelopment. A housing strategy that accommodates future residents without adequately protecting existing residents risks repeating patterns of displacement and racial wealth loss, particularly in communities that have historically faced barriers to homeownership and wealth accumulation.

Sources: Steven Overly, Delece Smith-Barrow, Katy O'Donnell, and Ming Li, "Washington Was an Icon of Black Political Power. Then Came Gentrification," POLITICO (Apr. 15, 2022), https://www.politico.com/news/magazine/2022/04/15/washington-dc-gentrification-black-political-power-00024515 ; National Community Reinvestment Coalition, "Shifting Neighborhoods" (2019), https://ncrc.org/gentrification/ ; NCRC, "Gentrification and Disinvestment 2020," https://ncrc.org/gentrification20/ .

XIX. Requested Action

For the D.C. Zoning Commission's Racial Equity Tool, I ask the Commission to strengthen both the Tool's requirements and its application in zoning proceedings within the Commission's jurisdiction. Specifically, the Commission should require a completed, publicly available Racial Equity Tool form for each applicable zoning action; minimum community-engagement standards; stronger, independently supported evidence from the Office of Planning; analysis of protections for existing tenants and homeowners; enforceable measures responsive to neighborhood conditions; and explicit investigation of land values, pressure to acquire homeowners' properties, tenant harassment, impervious surface coverage, and housing-related costs. The Tool should require analysis of effects on residents of all racial and ethnic backgrounds, with sufficiently detailed data to identify disproportionate burdens on historically disadvantaged populations, including Black homeowners. These reforms should ensure that the Commission meaningfully evaluates each proposed zoning action rather than presuming that an earlier FLUM decision resolves the racial-equity inquiry. In applying and revising the Tool, the Commission should expressly address unequal access to preexisting localized Small Area Plans, the delayed timing of future larger-area plans, and the risk that aggregate planning-area statistics will conceal disproportionate effects on Black homeowners in Crestwood. Before approving zoning actions whose impacts cannot otherwise be reliably assessed, the Commission should require neighborhood-specific environmental, infrastructure, and anti-displacement evidence.

Exhibit References

Exhibit A — OP, “DC 2050 and Small Area Planning — Roundtable Discussions,” June 6, 2026, Slides 6–8 and 10.

Exhibit F — April 3, 2026 correspondence from Ryan Hand concerning OP’s displacement-risk methodology.

Exhibit N — April 1–3, 2026 correspondence from Ryan Hand concerning environmental-impact-statement requirements and DC2050 policymaking.

Exhibit O — May 13, 2026 request to Councilmember Janeese Lewis George for legislative intervention, a Small Area Plan, and independent impact studies.

Exhibit P — April 16–October 23, 2026 correspondence with OP Director Anita Cozart regarding timing, scope, and neighborhood-specific analysis of the DC2050 REIA.

Exhibit Q — ANC 4E July 28, 2026 Public Meeting Transcript - DC2050 Deliberations, Requests for Independent Impact Studies, and Adoption of Resolution

Exhibit R — Office of Planning May 12, 2026 ANC 4E DC2050 Presentation - Proposed Residential Density, Housing Capacity, Affordability, and Displacement Risk

Exhibit S — August 28, 2026 Email from Lauren Marcinkowski, D.C. Office of Planning, Regarding DC2050 Displacement Analysis and the Rock Creek Tennis Center Record of Decision