EMPOWER DC
1419 V St, NW
Washington, DC 20009
(202) 234-9119
www.empowerdc.org @EmpowerDC

TESTIMONY FOR THE RECORD
Zoning Commission Roundtable on the Racial Equity Tool
Monday, October 26, 2026
Submitted by Parisa Norouzi, Executive Director, Empower DC

Good afternoon,

My name is Parisa Norouzi and I am the co-founder and Executive Director of the citywide grassroots organization Empower DC, where since 2003 I have worked with DC communities to prevent displacement and advance racial and environmental justice.

I am here today to encourage the Zoning Commission to take action to improve the racial equity tool currently in use and expand efforts to promote racial equity through the zoning and development process in the District.

The Zoning Commission instituted use of the racial equity tool in response to the 2021 Comprehensive Plan requirement. After over 3 years of implementation, there is no evidence that the process now in place is furthering racial equity outcomes.

Anyone would agree that talking about an issue alone doesn't solve it. Right now, we have a racial equity tool that requires applicants to discuss racial equity data but it does not require them to take any particular action to address it. The result is essentially busy work.

Within the notice for this roundtable, under "commission observations of the current tool" it notes "the commission has not consistently found a clear link between the data metrics and the zoning actions under review. The commission also acknowledged that its overall ability to assess the potential racial equity impacts of a zoning action is limited, particularly because future outcomes are uncertain. Further, even if a zoning action will likely result in negative racial equity impacts, that outcome alone is not a basis to deny a zoning action."

In other words - we are not sure that this effort is advancing racial equity, and it isn't actually a requirement that it does.

ZONING COMMISSION
District of Columbia
CASE NO. 26-RE
EXHIBIT NO. 13

While the racial reckoning of 2020 that followed the murder of George Floyd brought racial equity into the headlines and facilitated passage of new laws and requirements - there has been an outcry from District residents concerned about the systematic removal of Black residents and the unjust land use practices that cause displacement for decades. Whether fighting Urban Renewal aka “Negro Removal” in Southwest, “Hopeless” Hope IV public housing demolition, “White man’s roads through Black man’s homes” aka the freeway battles, the closure of 40 DC public schools in 10 years time displacing Black students, public land giveaways for a dollar to build million-dollar condos at the Wharf and McMillan, among so many others - District residents have always been fighting for racial equity.

So while we are evaluating a tool today - we really need to look at that tool in the context of a system of land use decision making that has always harmed Black people in the District, especially lower income Black people - and decidedly so, through intentional policies to “attract new residents,” “raise the tax base,” “improve educational outcomes,” “deconcentrate poverty,” or whatever the slogan of the year is - at the expense of Black residents who are routinely displaced from their homes and communities.

The Zoning process has long been complicit in this removal. And still today the process is inequitable in several ways:

1. There are no racial equity goals in place from which to measure progress
2. Outside of Inclusionary Zoning - which ironically is not inclusive of families earning below 50% AMI - there are no specific measures required of applicants to advance affordability through their projects
3. The zoning process itself has not become more inclusive and accessible, remaining largely the domain of developers and zoning attorneys
4. The Zoning Commission does not have adequate support from the Office of Planning or its own staff to effectively assess and pursue racial equity within the matters before it and has no connections with community organizations or outside experts to guide its steps.

While major systemic reform is needed, there are several steps the Zoning Commission can take to improve the racial equity tool and to supplement its efforts to promote racial equity within the District.

Define the community engagement requirement
It is acknowledged that racial equity is both a process and an outcome. While the racial equity tool includes positive language about engaging affected communities, there is no

defined requirement for this engagement. A baseline standard must be defined to ensure that there is clarity and agreement about what "community engagement" must entail, and to prevent disparity across projects and geographies for how engagement is undertaken.[1] The Commission must then refuse to move forward with projects that fail to comply. This is essential because we know that the entire conversation changes when impacted residents are in the room. Meaningful engagement can be a true game changer.

Require applicants to incorporate specific racial equity interventions

The Zoning Commission can move the needle on racial equity by requiring that applicants incorporate one or more racial equity interventions from a menu of options into their projects. This could include more family sized units, affirmative marketing to voucher holders, more/deeper affordable units, and community benefit agreements that specifically further racial equity concerns as identified through community engagement. Further, all applicants operating in displacement risk areas must be required to incorporate displacement prevention elements in their project. Where tenants are in place, this must include a relocation and return plan that accommodates the needs of affected tenants and demonstrates cooperative design with the affected residents and /or their representative.[2]

Require the Racial Equity Tool be filled out in full, as a form

As currently designed applicants reference the tool in their project application but are not required to specifically answer each question in the tool. This makes it harder to evaluate what questions were or were not addressed by the applicant. The tool should

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[1] As a process, **we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives,** particularly people of color. Applying this lens also reflects the targeted support to communities of color through policies and programs that are aimed at centering – focusing on their needs and barriers to participate and make informed decisions – and eliminating racial divides, all while taking into account historical trauma and racism. 213.9 - DC Comprehensive Plan Framework Element

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

• Identify and consider past and current systemic racial inequities;

• Identify who benefits or is burdened from a decision;

• Disaggregate data by race, and analyze data considering different impacts and outcomes by race; and

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

- DC Comprehensive Plan, Implementation Element

be converted into a form to allow the commission and the public to see clearly which questions were answered or left unanswered.

There are additional measures the Commission must take to strengthen its ability to further racial equity in the District, such as:

- Requiring that the Office of Planning, which completes Comprehensive Plan consistency review for the Commission, make available data that is necessary in order to evaluate impact. One important tool that OP has not delivered is the Anti-Displacement Strategy, which was also required by the 2021 Comp Plan. This strategy should provide more details about displacement risk in the project areas which can be used to evaluate project applications. Another missing key data point is the District's 'housing gap"- the current need that exists for housing units at various income levels. As seen in the Housing Gap Report by the National Low Income Housing Coalition, the District lacks 37,531 units for households under 30% AMI, and 28,608 units below 50% AMI - a total of over 66,000 units needed for households unserved by Inclusionary Zoning[3].

- Define racial equity goals for both the zoning process and its outcomes. Without a guiding set of goals it is impossible for the Commission to evaluate its impact. I would argue that without a plan and goals, the Commission is not currently complying with the Comprehensive Plan's racial equity directives.[4]Racial equity metrics should be part of the Zoning Office's key performance indicators that it reports on during budget oversight season.

- The Commission needs to identify outside support to guide its racial equity efforts. Currently the Office of Planning and Office of Racial Equity are not providing the support the Commission needs. Perhaps this can be rectified under the incoming administration. The Zoning Commission should outreach to the incoming Mayor and specifically request support with setting racial equity goals

[3] Gap Report: District of Columbia | National Low Income Housing Coalition The Report finds an excess of units for households at 100%AMI - 105 for every 100 households.
[4] 2501.7 Action: IM-1.1.B Equity Tools for District Agencies, including the Zoning Commission

Prepare and implement tools, including training, to assist District agencies in evaluating and implementing the Comprehensive Plan's policies and actions through an equity, particularly a racial equity lens. This includes tools to use as part of the development review process, preparation of plans, zoning code updates, and preparation of the capital improvement program, that considers how to apply an equity analysis in these processes, including any information needed. This shall specifically include a process for the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis. 2501.7

and evaluating racial equity impact and urge the administration to streamline racial equity efforts across the many agencies responsible for ensuring equitable outcomes. The Commission should also engage in trainings and cohorts offered by the Government Alliance on Racial Equity, or GARE.

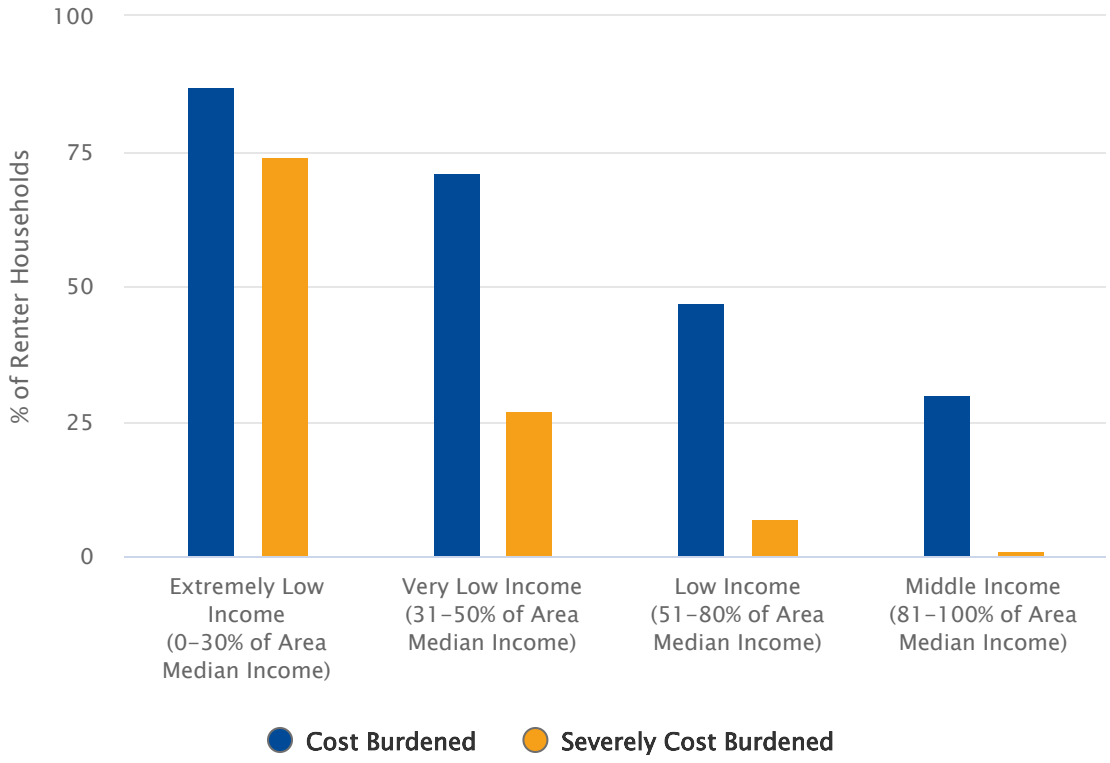
- The District must adopt a cumulative impact-type analysis when it comes to measuring racial equity impact. Demographic and housing cost burden data alone does not suffice. We need to understand the impact of upzoning on land speculation, displacement and rising rents. We need to factor in job loss and cost of living increases to residents' ability to afford their homes. And we need to implement targeted anti-displacement investments in at-risk communities, well ahead of upzoning.

- The Office of Planning, Department of Housing and Community Development, Deputy Mayor for Planning and Economic Development and the DC Zoning Commission need to commit to serving the current, known housing needs of District residents - not continuing to build for projected future residents and promising a trickle down benefit to the people who are locked out of these new developments.

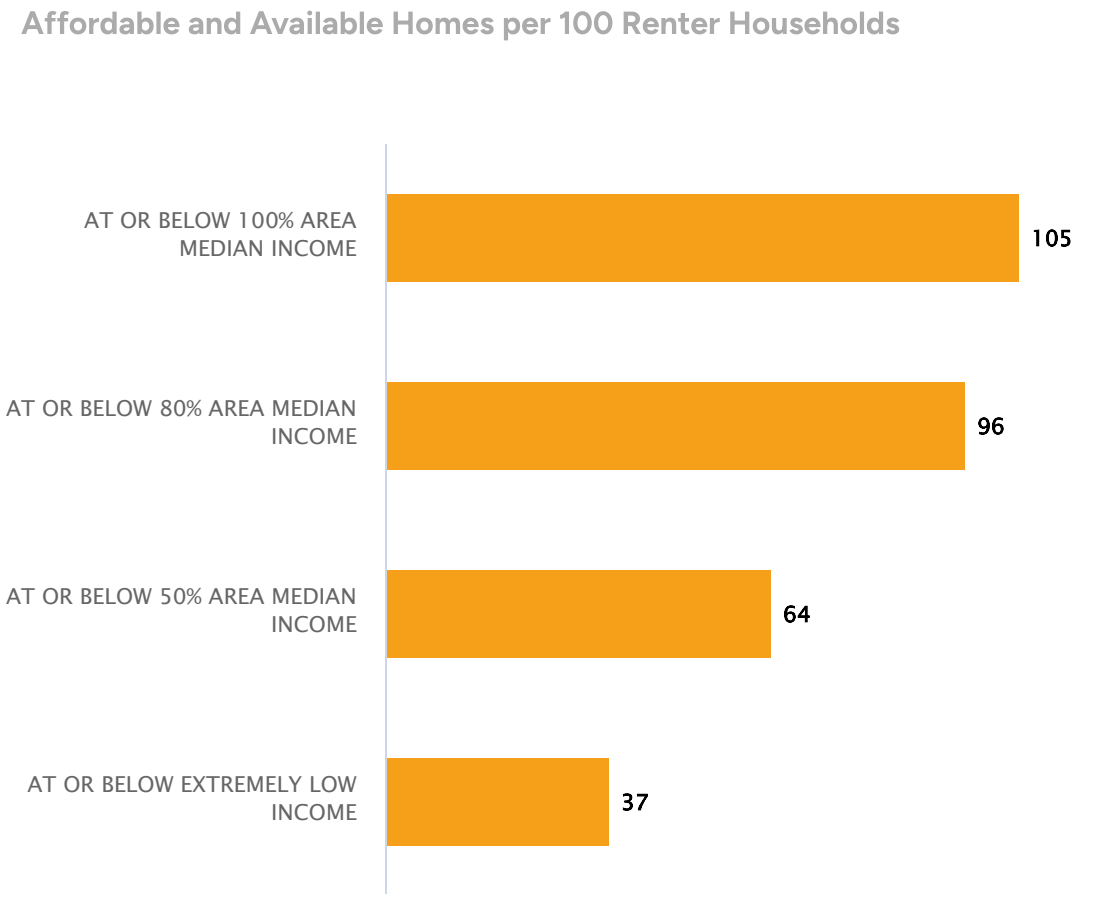
Right now across the country, housing is unaffordable, wages are stagnant, and renters cannot afford to pay the rent. We are told that investors are walking away, and that landlords need a bail out. We will all shake our heads in agreement that housing is a human right - and yet we continue to rely on a housing commodification paradigm that is no longer viable. Let’s stop trying to repeat old development models that exacerbated inequity and instead turn to land trusts, social housing and other proven community development models that secure housing as a shared trust, not a profit driven commodity. Until we change “building as usual,” racial equity analysis is busy work and a shallow veneer meant only to distract and pretend that we are doing something to address racial equity, when in fact we are not.

District of Columbia

Housing Cost Burden by Income Group



Renter households spending more than 30% of their income on housing costs and utilities are cost burdened; those spending more than half of their income are severely cost burdened.



All Gap Data for District of Columbia

YEAR 2024

	District of Columbia	Washington-Arlington-Alexandria, DC-VA-MD-WV (Metro)
Extremely Low Income Households and Available Rentals		
EXTREMELY LOW INCOME RENTER HOUSEHOLDS	**59,600**	211,995
AFFORDABLE AND AVAILABLE RENTAL HOMES	**22,069**	62,158
Surplus (Deficit) of Affordable and Available Rental Units		
AT OR BELOW EXTREMELY LOW INCOME	**-37,531**	-149,837
AT OR BELOW 50% AMI	**-28,608**	-162,018
Affordable and Available Rental Units per 100 Households at or below Threshold		
AT OR BELOW EXTREMELY LOW INCOME	**37**	29
AT OR BELOW 50% AMI	**64**	52
AT OR BELOW 80% AMI	**96**	96
AT OR BELOW 100% AMI	**105**	103
% of Renter Households with Cost Burden		
AT EXTREMELY LOW INCOME	**87**	88
EXTREMELY LOW INCOME TO 50% AMI	**71**	80
51% TO 80% AMI	**47**	47
81 TO 100% AMI	**30**	20

% of Renter Households with Severe Cost Burden	District of Columbia	Washington-Arlington-Alexandria, DC-VA-MD-WV (Metro)
AT EXTREMELY LOW INCOME	**74**	77
ELI TO 50% AMI	**27**	31
51% TO 80% AMI	**7**	5
81 TO 100% AMI	**1**	2

AMI = Area Median Income.
Source: American Community Survey (ACS) and ACS Public Use Microdata Sample (PUMS). For more information on the estimates' margin of error, please contact aaurand@nlihc.org.

KEY FACTS

In **District of Columbia**, only **37** rental homes are affordable and available for every 100 extremely low-income households.

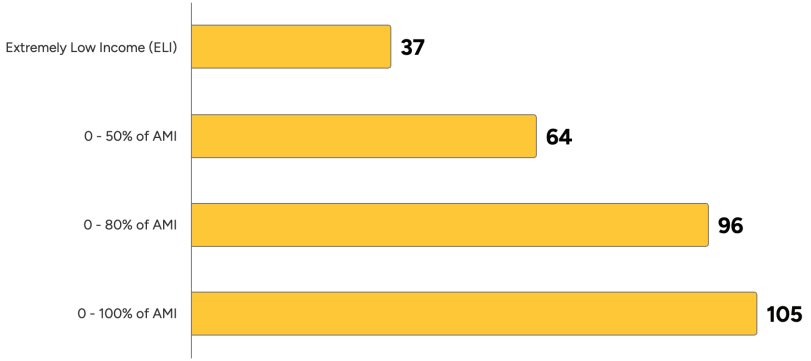
District of Columbia needs to make **37,429** more homes affordable for extremely low-income households by expanding access to rental assistance and building deeply affordable rental homes.

In **District of Columbia**, a full-time worker must earn an hourly Housing Wage of **$43.19** to afford the average Fair Market Rent (FMR) for a two-bedroom rental home in the state (**$2,246**).

To afford this rent and utilities -without paying more than 30% of income on their home - a household must earn **$89,840** annually.

The Relative Supply of Affordable and Available Rental Homes Increases with Income

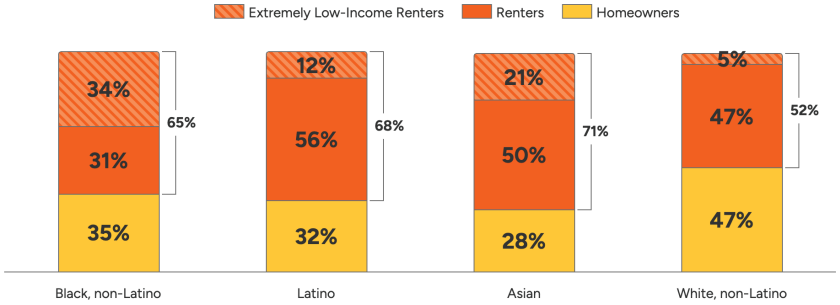
Affordable and Available Rental Homes per 100 Renter Households



Note: AMI = Area Median Income. Source: 2024 ACS PUMS.

Non-white Households and Latino Households Often are More Likely Than White Households to be Renters with Extremely Low Income

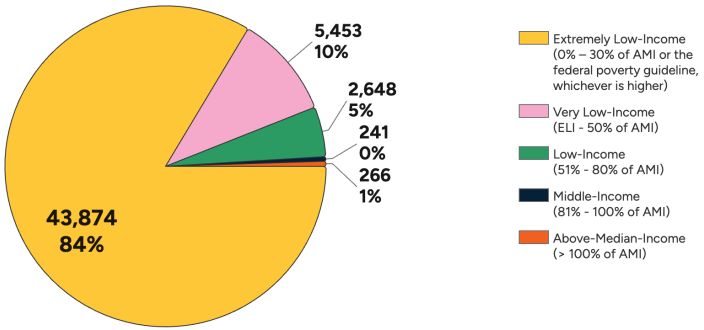
Share of Households by Tenure



Source: 2024 ACS PUMS.

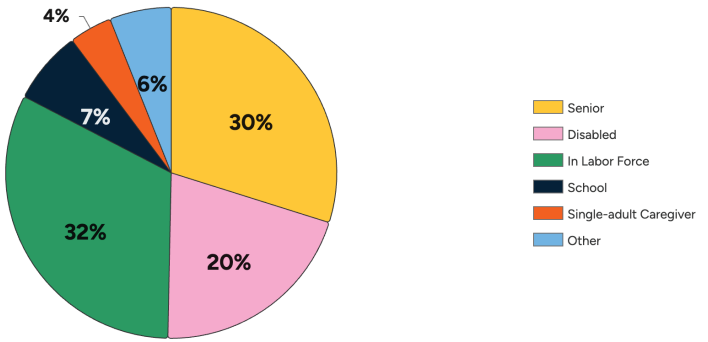
Extremely Low-Income Renters Make Up Majority of Severely Cost-Burdened Renters

Severely Cost-Burdened Renter Households by Income



Note: The percentages in this figure are rounded and may not add to exactly 100. A household is considered severely cost-burdened when it spends more than 50% of its income on housing costs. Source: 2024 ACS PUMS.

Most Extremely Low-Income Householders are in the Labor Force, are Seniors, or Have a Disability



Note: Mutually exclusive categories applied in the following order: senior, disabled, in labor force, enrolled in school, single adult caregiver of a child under 7 or of a household member with a disability, and other. Nationally, 12% of extremely low-income renter households are single-adult caregivers, 48% of whom usually work more than 20 hours per week. Source: 2024 ACS PUMS.

Impact on **District of Columbia** Low-Wage Workers

A minimum wage worker would need to work:

84 hours per week or 2.1 full-time jobs to afford a 1-bedroom apartment at Fair Market Rent (FMR).

94 hours per week or 2.3 full-time jobs to afford a 2-bedroom apartment at Fair Market Rent (FMR).

Most Expensive Areas	2-Bedroom Housing Wage
Washington-Arlington-Alexandria HMFA	$43.19

Common Occupations	Median Hourly Wage
Home Health and Personal Care Aides	$21.10
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	$19.04
Fast Food and Counter Workers	$18.50

SOLUTIONS

- Provide significant resources to build and preserve homes affordable to renters with the lowest incomes through investments in public housing and the national Housing Trust Fund
- Encourage states and local communities to reform zoning and land use regulations that prevent housing from being built and push up housing costs
- Bridge the gap between incomes and housing costs by expanding rental assistance so that it is universally available to all eligible households or consider other innovative approaches, such as a fully refundable renters' tax credit
- Prevent evictions and homelessness by creating permanent tools, such as emergency rental assistance, to help stabilize families in crisis
- Other federal housing resources, including the Low-Income Housing Tax Credit, should be reformed to better address the shortage of rental housing affordable to the lowest-income households.

If you have a question or are interested in learning more about how these numbers are calculated, contact research@nlihc.org