Public Testimony on the Zoning Commission's Racial Equity Tool

Good evening. My name is Ryan Curren, and I'm here on behalf of Race Forward, a national nonprofit working to build a just, multiracial democracy.

Thank you for the opportunity to comment on the Zoning Commission's Racial Equity Tool, or RET.

We applaud the District's commitment to racial equity, demonstrated through the leadership of the Mayor's Office of Racial Equity and the Council's Office of Racial Equity. We especially want to recognize the District's efforts to translate that commitment into policy, including the equitable growth policies in the Comprehensive Plan and the Office of Planning's Racial Equity Action Plan.

The District has also been a longtime member of our Government Alliance on Race and Equity, or GARE, and an inspiration to other jurisdictions across our national network.

The RET is an opportunity to build on this foundation and move further from policy commitments to implementation.

Today, I'll focus on promising practices from across the country in four areas: community engagement, data, anti-displacement measures, and the capacity needed to implement the tool effectively.

First, apply the tool both upstream and downstream.

The District is among a relatively small number of cities that apply a racial equity tool during development review. Boston's AFFH Zoning law and New York City's Racial Equity Reports also use this approach to identify opportunities for community benefits and address displacement impacts that may not be adequately addressed by existing zoning requirements or tenant protections.

This is an important downstream intervention. It allows the City to examine individual projects and ask who benefits, who bears the burdens, and how inequities can be addressed.

But we see other jurisdictions apply their formal and structured RET *upstream*—to the City's budget, Comprehensive Plan (See Seattle equity analysis of the Comp Plan), zoning map and code updates, and neighborhood and small-area plans.

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Addressing equity at this earlier stage allows the City to bake equity into the rules that shape development. It also creates opportunities to capture value generated by rezoning and direct it toward community benefits across multiple properties.

This provides greater predictability for property owners and developers, while giving communities greater assurance that new development will address longstanding racial disparities rather than deepen them.

Second, strengthen community engagement.

The people most affected by development must have a meaningful role in identifying potential harms and defining solutions that maximize community benefits.

Quantitative data can help identify displacement risks, but residents can explain how those pressures affect their lives and what interventions would make a difference.

We recommend establishing clear community engagement standards that applicants must meet to complete the RET. These should include engagement early in the predevelopment and architectural design process, when residents can still meaningfully influence a project.

The District could also provide applicants with a resource list of community-based organizations led by or serving communities of color and people experiencing housing insecurity, including tenant unions and human services organizations.

To increase transparency, the City could also require applicants to complete the RET through an online form that allows the public to see which questions have been answered and which remain outstanding.

Third, improve access to data.

We recommend making relevant data readily accessible to applicants as early as possible in the development process.

This should include historical information about harms experienced by communities of color, such as displacement associated with urban renewal and public infrastructure projects.

It should also include indicators of current vulnerability, such as housing cost burdens, overcrowding, evictions, and foreclosures, as well as early warning signals of displacement, including habitability complaints and utility shutoffs or late payments, where available.

Making these data accessible can help applicants and the public better understand neighborhood conditions and identify risks.

Fourth, connect the RET to meaningful anti-displacement measures.

The RET can help identify and mitigate project-level harms, but it cannot replace a comprehensive, citywide anti-displacement strategy (see Boston's anti-displacement strategy)

and fair housing plan. These should direct community stabilization resources to areas facing high displacement risk while prioritizing affordable housing and rezoning in high-cost areas with a history of exclusion.

At the project level, the RET should help ensure that existing tenant protections are enforced. Applicants should demonstrate compliance with applicable tenant rights laws, with appropriate verification rather than relying solely on self-reporting.

When residents are directly displaced by development, meaningful relocation assistance should help cover first and last month's rent, a security deposit, and at least one additional month of rent.

The RET should also encourage applicants to maximize community benefits, including family-sized units, deeper affordability, preference policies for local residents, affirmative marketing to housing voucher holders, and community benefits agreements that support initiatives identified by residents themselves.

Finally, ensure the capacity to implement the tool with integrity.

The Office of Racial Equity needs adequate staffing and resources, including subject matter experts who can provide technical assistance and meaningfully review completed RETs.

The City should also invest in tenant unions, community organizers, and community-based organizations to conduct ongoing public education and outreach about zoning, development, and displacement. This work should complement—not replace—the engagement required of applicants.

These investments will help ensure the RET is not simply a form to complete, but a process that leads to meaningful changes in policy and practice.

In closing, the Racial Equity Tool is an opportunity to make the invisible visible: to identify who benefits from development, who bears its costs, and how the District can achieve more equitable outcomes.

Race Forward encourages the District to build on its leadership and continue developing the RET as a national model for equitable planning.

As the District advances zoning reform and invests in its neighborhoods, the RET can help ensure that growth expands opportunity, advances fair housing, and does not intensify the longstanding racial disparities and displacement pressures that equitable planning should address.

Thank you for your time and consideration.