Overview & Purpose

The Office of Zoning (OZ) reviewed the effectiveness of the DC Zoning Commission's revised Racial Equity Analysis Tool (RE2), which was updated to comply with the Comprehensive Plan's mandate to evaluate zoning actions through a racial equity lens. The review compares three stages: pre-tool (RE0), the first tool (RE1), and the revised tool (RE2), focusing on improvements in community engagement, data use, and project outcomes.

Key Improvements Across Tool Versions

- **RE0 (Pre-tool):** Outreach and analysis were vague, with little detail on community engagement or impacts. Reports relied mostly on applicant statements, not community input.
- **RE1 (First tool):** Introduced themes like displacement and housing, with some improvements in outreach and timing. However, details and community perspectives remained limited.
- **RE2 (Revised tool):** Major improvements in outreach, including specific engagement with stakeholders (residents, businesses, agencies), detailed methods (websites, meetings, emails), and comprehensive reporting of community input, impacts, and mitigation efforts. The number of affordable units offered increased, suggesting a link between outreach and project outcomes.

Case Outcomes: Detailed Findings

Scope

- The review analyzed **52 Commission cases** filed between February 2023 and September 2024, including map amendments, planned unit developments (PUDs), text amendments, design reviews, modifications, and campus plans

1. Enhanced Community Engagement

- Applications using RE2 provided more detailed statements about outreach, integrating sample questions and connecting findings to the Racial Equity Crosswalk.
- Example: One applicant described meetings with the ANC, tenants, community groups, and residents, which led to design changes and amenities specifically for

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senior citizens. The applicant also explained why certain design changes (like reducing units) were not made.

2. Effective Use of Disaggregated Data

- Requiring the Office of Planning (OP) to provide disaggregated race and ethnicity data helped clarify where more housing and affordable units were needed.
- Example: In one case, data showed the area was predominantly white with higher median income and homeownership rates than the District overall. This supported the increased density and affordable housing that would be facilitated by the proposed map amendment.
- In another case, the data revealed nuanced income differences by race, helping the Commission understand which groups were more likely to benefit from the increased housing opportunities resulting from the zoning action's approval..

3. Balancing Affordable Housing Distribution

- The data also helped identify areas potentially overburdened with affordable housing units.
- Example: In a case involving rezoning located in an area with an overconcentration of existing affordable housing, OP recommended not applying Inclusionary Zoning Plus (IZ+) to avoid clustering too much affordable housing in one area. The Commission agreed, aiming for a mixed-income neighborhood and naturally occurring revitalization.

4. Open-Ended Nature of the Tool

- The open-ended questions in RE2 allowed applicants to provide substantive explanations of their engagement and project impacts, rather than just checking boxes.
- This flexibility made the process accessible to a wider range of developers and encouraged more meaningful community engagement.

Initial Conclusions

- **RE2 led to more robust community engagement**, more detailed applications, and better contextualization of equity issues.

- The presumption that RE2 would reduce the number of approved projects or create compliance burdens was not substantiated; the number of cases did not decrease, and open-ended questions yielded informative response.

Recommendations & Next Steps

- Continue refining the tool based on feedback and case outcomes.
- Consider standardizing community outreach benchmarks and clarifying evaluation criteria for racial equity.
- Maintain flexibility in the tool to encourage substantive, context-specific engagement and reporting.
- The Commission may consider a roundtable to gather feedback on standardizing outreach, clarifying roles of community organizations, establishing racial equity goals, and balancing housing provision with engagement.

Category	RE0	RE1	RE2
Public Outreach	Outreach was conducted with ANCs and DC Agencies. There was no elaboration on the meetings.	Outreach was conducted with multiple ANC/DC Agencies and with residents of adjacent townhome community.	Outreach was conducted with: Primary stakeholders including Current residents, ANC/SMD, 200 footers, and City Council Member Secondary stakeholders including the following surrounding businesses: DC government institutions, Medical facilities Non-profit entity, and Church.
Characteristics of the Affected Community	Does not discuss.	Does not discuss.	Includes information which informed their methods of outreach.
Outreach methods utilized	Does not discuss.	Does not discuss.	• Creation of project website (https://imaginemvdc.com). • Door to door outreach • Virtual (Zoom) resident engagement meetings • Email communication via contact list developed to date.

Category	RE0	RE1	RE2
			• Email communication via existing site property manager's rental platform.
Number of meetings referenced	• "Multiple" intensive rounds of meetings with the ANC. • Applicant has made itself available for discussing the Project with any interested neighbors or community groups.	• 3 with ANC • "numerous" with residents of adjacent townhome community.	• 1 Workshop • 4-5 with ANC • 6-10 with community.
Timing of the outreach	The case record does not specify the timing of the outreach conducted.	Outreach began approximately 9 months prior to application.	Outreach began approximately 10 months prior to public hearing.
Timing of the RE Analysis Submission	An analysis was provided prior to the public hearing.	An analysis was provided shortly after the application was submitted.	An analysis was provided at the time the application was submitted.
Potential Impacts/ Outcomes	Potential impacts and outcomes are discussed but the analysis appears to be based on the applicant's statements not necessarily on input from the community.	Analysis provides the positive impacts of the project; however, the analysis appears to be based on the applicant's statements not necessarily on input from the community.	Analysis was provided with more details, including input from the community. Includes: • List of community members who may benefit from the project • List of community members who may be burdened from the project • List of potential positive outcomes • List of potential negative outcomes • List of changes/modifications to the proposed project that respond to community input • List of input that was not incorporated • Efforts made to mitigate potential negative outcomes • The report also contains a detailed evaluation of positive, negative and neutral outcomes.
Affordability	11% of units earning 60% 2% of units earning 50%	15% of units will be at 60% income levels.	17% of units will be at 60% and 50% income levels.