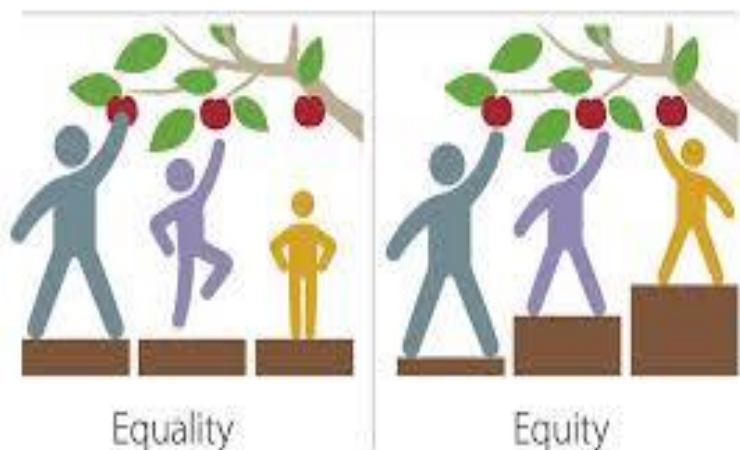


**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
ZONING COMMISSION  
PUBLIC ROUNDTABLE – Z.C. Case No. 22-RT1  
September 22, 2022**

Testimony of Neighbors for a Livable Community  
3700 University Avenue NW Washington, DC 20016  
Alma Gates, Board Member

Equity. a term with many meanings and definitions is used often interchangeably with the term “equality,” but equity cannot be achieved until barriers are resolved. In the illustration below, three individuals have unequal access to a system — in this case, a tree that provides fruit. With equal support from evenly distributed tools, their access to the fruit remains unequal. The equitable solution, however, allocates the exact resources that each person needs to access the fruit, leading to positive outcomes for all. It’s critical to remember that social systems aren’t naturally inequitable — they’ve been intentionally designed to reward specific demographics for so long that the system’s outcomes may appear unintentional but are rooted in discriminatory practices and beliefs that create barriers.



Neighbors for a Livable Community, “NLC,” has worked tirelessly to ensure institutions and their surrounding neighborhoods exist equitably and in concert with the Comprehensive Plan. In keeping with directives in the Plan, the Zoning Commission, “ZC,” has provided an Evaluation Tool to be viewed through a “Racial Equity Lens.” The tool needs accountability measures, which must be intentional, concise, and enforceable. For too long accountability has been the responsibility of the Zoning Administrator who

lacks qualified staff to enforce the Zoning Regulations. It is unrealistic to believe accountability measures will be handled differently by the Zoning Administrator's staff when it comes to racial equity issues. If the ZC is serious about ensuring an equity lens is employed in the review of zoning applications as opposed to more rhetoric, ZC will request that the Office of Planning, "OP," provide a planning analysis outlining the racial equity impact in all set down reports and zoning application reports, and to draft and track the measures of accountability for each case coming before the Commission.

NLC thanks the Zoning Commission for the opportunity to present its opinions and suggestions at this roundtable. The roundtable is a good beginning, and the public will benefit further from an opportunity to review what is being proposed prior to codification in the Zoning Regulations. NLC strongly encourages the Zoning Commission to require OP to implement a planning analysis and to draft accountability measures based on an equity lens for all cases coming before the Commission.

NLC is aware that inequity exists within the Public Schools of the District of Columbia. At a recent At-Large Candidates' airing, one panelist mentioned that school choice across the river is not an option for parents living East of the River because they are considered "out of bounds" for admittance to schools west of the river. Education is one of the most blatant examples the city has of inequality and inequity. Why are schools East of the River not on par with their counterparts across the river? How can this inequity be corrected? The Zoning Commission has an opportunity to propose that developers not bound by IZ "adopt a school" and work directly with the school to help remove barriers, deliver goods, and needed services to ensure teachers and students have the resources they need to succeed. If education is one of the most important tools for success that needs to be treated equitably, what can the Commission do to create additional pathways for success through zoning?

First Source is an example of a zoning requirement which has been treated as rhetoric. Developers must be required to hire and train unskilled workers through an apprentice program. Apprenticeships will broaden the workforce, provide the tools for success, and ensure a more equitable approach to hiring is available to those in need of work.

In closing, NLC believes direction from the Comprehensive Plan must be implemented equitably. The Plan does not discriminate, but at the present time does not provide the kind of direction necessary for the successful implementation of equitable accountability. Now is the time for the Zoning Commission to use the Equity Lens to ensure its decisions are not only equitable but address equity and its success through the implementation of a planning analysis and accountability measures.