

Testimony

**Zoning Commission RoundTable on Racial Equity Tool
September 22, 2022**

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Introduction

My name is Lauri Winter speaking on behalf of the Washington, DC Team of the United Church of Christ Potomac Association Justice and Witness Action Team (JWAN-DC). This team is comprised of representatives from United Church of Christ congregations located in Washington, DC. As a community of faith, we are motivated by the call to address the needs of the “least of these” and require justice on their behalf. I am a DC resident of 7years years bearing witness to the strengths and challenges facing this beloved city. I am particularly concerned about the disproportionate disparities in health and threats to Black and Brown communities,especially those without shelter or fighting to keep their homes.

We welcome this opportunity to speak to the proposed Zoning Commission Racial Equity Tool. The tool as it stands requires the applicant/developer provide a statement regarding racial equity that will be analyzed in response to key questions. However, only using the generic questions proposed in the current tool does not reflect the requirements for the racial equity lens as explained in the Comprehensive Plan. A meaningful racial equity lens requires a tool that facilitates decision making or give guidance as to whether a given proposal will actually make a difference regarding racial equity and housing justice. The criteria to manifest racial equity in our residential spaces must be applied not only by the Zoning Commission but also by the Office of Planning and linked to the Department of Housing and Community Development programming, and any other concerned agencies in the city accountable for housing equity.

Our basic reference is from the Government Alliance on Race and Equity (GARE), an alliance of government entities that has as its mission to achieve racial equity within their jurisdictions. (It is our understanding the DC is a member of this organization). GARE states that

“Racial equity tools provide a structure for institutionalizing the consideration of racial equity. A racial equity tool:

- proactively seeks to eliminate racial inequities and advance equity;
- identifies clear goals, objectives and measurable outcomes;
- engages community in decision-making processes;
- identifies who will benefit or be burdened by a given decision, examines potential unintended consequences of a decision, and develops strategies to advance racial equity and mitigate unintended negative consequences; and,
- develops mechanisms for successful implementation and evaluation of impact.” (*Racial Equity Toolkit: An Opportunity to Operationalize Equity*)

Proactively seeks to eliminate racial inequities and advance equity

There is a clear mismatch in the current housing stock and the needs of its current residents. Black and brown residents are disproportionately located in the most impoverished areas. There is a grossly inadequate quantity of housing that would address their needs. The tool needs to facilitate corrections to the mismatch between income status and housing availability. We need an ample supply of **deeply affordable** housing! Boston has a list of interventions that applicants are required to implement to proactively address displacement and advance racial equity, prior to coming to the Zoning Commission for approval.

Identify clear goals, objectives and measurable outcomes

The tool must go beyond the currently asked questions. It is our assertion that measurable goals need to be established for the city as a whole and then segmented in a manner that would address the specific actions in given neighborhoods that would facilitate racial equity (e.g., increase in of affordable units in one neighborhood, and protection from displacement of existing residents in another neighborhood). We encourage a tool that incentivizes creativity in solution-finding (e.g., conversion of commercial space to affordable housing and shelter or bridge housing for the unhoused).

Engages community in decision making process

Intentional engagement of all parties in decision-making is critical. Families, businesses, community organizations, faith communities that may be directly or indirectly impacted need to be part of solution finding. There will be those in areas with more wealth and amenities, may oppose affordable housing that brings in greater racial diversity from a “not in my backyard” mentality. And those who live in historically under-resourced communities often fear higher risk of displacement. All parties need to be engaged in the dialogue to facilitate creative ways to achieve citywide goals.

Identifies who will benefit or be burdened by a given decision, examines potential unintended consequences of a decision, and develops strategies to advance racial equity and mitigate unintended negative consequences; and,

As noted above, the identification of the impact of decisions is so important. Consider the displacement risk of those who live within a mile of a given development, due to increase in tax rates. Consider the loss of community service organizations as their rents go up, due to both tax rates and market pressures. Consider the impact on the “sense of community “ which maintains the informal norms that maintain safety in the “neighborhood.” Destruction of the fabric of informal norms contributes to community violence.

Develops mechanisms for successful implementation and evaluation of impact

Achievement of racial equity requires adequate data – both quantitative and qualitative. Data is needed as a baseline assessment of current status. Data is required to mark expectations to strive towards. Data is required to measure progress towards those goals.

Summary

We believe that the process for applying a racial equity lens to decisions needs to be done thoughtfully. The tool needs to (1) include a clear definition of “racial equity” as applicable in development decisions; (2) use a framework that addresses the housing needs of the city as a whole, and segmented per neighborhood; (3) engage communities in the process of decision making, including those directly and indirectly impacted [not just at the proposed site]; and (4) use quality data for goal setting and measurement of progress and accountability. As noted in the statements above, there are other jurisdictions that have developed strategies to meaningfully address the issue of racial justice, each with their strengths and weaknesses. In addition to this Roundtable the Commission must thoughtfully create a meaningful Racial Equity Tool and a transparent process by which proposals and plans are developed and evaluated. The analysis using this tool must be made mandatory through a zoning text amendment and there must be accountability and reporting to achieve racial equity in Washington, DC.