TO: DC Zoning Commission Members
FROM: Barbara Gilbert, 355 I Street SW #619, Washington, DC 20024
        (m) 202 213 8862   (e) gilbertbarbara70 at gmail dot com
RE: DC Zoning Commission Case No. 22-RT1
DATE: September 21, 2022

Dear DC Zoning Commission Members,

My name is Barbara Gilbert and I am a seven-year resident of Ward 6, Southwest DC. I am submitting written comments for DC Zoning Commission Case No. 22-RT1 regarding the proposed racial equity analysis tool located on its website. Unfortunately, the Zoning Commissions' proposed Racial Equity Tool is wholly inadequate for evaluating proposed actions through a racial equity lens as part of the Zoning Commissions' Comprehensive plan consistency analysis.

While this proposal is called a "tool" by the Commission, the contents are merely suggested guidance and completely lacking any metrics to evaluate proposed actions. Without metrics that reference existing and historic data, these guidelines cannot achieve the body's stated goal of "…analyzing zoning actions through a racial equity lens." Additionally, while the "tool" references only general topics for analysis, it also notes the Commission can set and use self-defined goals for its evaluation criteria. However, goals have already been clearly set by the Comprehensive Plan in the "Comprehensive Plan Amendment Act of 2021." Among these previously stated goals, are the following, found under "Land Use":

> **LU-2.1 A District of Neighborhoods**
> "Conserving, creating, and maintaining inclusive neighborhoods, while allowing new growth that fosters equity, including racial equity, and accessibility. 300.2"
>
> "…land use policies and actions must be viewed through a racial equity lens to provide equitable development that provides adequate access to these services and opportunities within neighborhoods of color and low-income communities. 310.1

Recommendations
With the goals already existing, the purpose of a tool is HOW to measure proposals, not WHAT to measure. To serve as a true instrument the Commission can use to evaluate proposals and its ability to achieve these existing goals stated in the Comprehensive Plan, the following elements must be included and measured:

- Identify past and current systemic racial inequities with publicly available data disaggregated by race;
- Use past and current systemic racial inequities identified in the data above as the baseline for evaluation of future and forward-looking effects;

- Accurately identify who benefits or is burdened by or from Zoning Commission decisions using the above-described data and baseline;
- Evaluate proposed decisions in their ability to reduce systemic racial inequities, eliminate race as a predictor of results, and to promote equitable development outcomes.

Data for metrics to measure the achievement of the Comprehensive Plan's Goals are readily and publicly available. See below, downloaded data from the Census Bureau for the city, disaggregated by race, gender, age, and more demographics. [File ACSDP5Y2020.DP05-2022-08-10T140 from Census.gov.] Census tract data is easily matched to DC Ward maps using zip codes, as demonstrated in my pivot table seen below.

Row Labels	Sum of Total population	Sum of White	Sum of Black or African American	Sum of American Indian and Alaska Native	Sum of Asian	Sum of Native Hawaiian and Other Pacific Islander	Sum of Some other race	Sum of Hispanic or Latino (of any race)
Atlas	12,205	8,637	2851	133	960	0	480	1032
Barney Circle	8,057	3,556	4228	101	379	0	218	565
Capitol Hill	31,097	24,029	5724	133	1504	61	775	2172
Kingman Park	8,557	4,145	4370	27	150	0	172	624
Mt. Vernon Sq	6,394	2,658	1723	29	1489	0	554	820
Navy Yard	7,167	5,646	1277	0	488	0	95	434
NoMa/Sursum Corda	9,305	5,139	3633	68	516	23	336	628
Shaw	6,634	3,818	2413	38	233	0	302	694
Southwest	16,983	10,043	6553	211	789	28	331	1579
Grand Total	**106,399**	**67,671**	**32772**	**740**	**6508**	**112**	**3263**	**8548**

Neighborhood Pop as % of Ward	% of Ward Black Residents	% White by Neighborhood	% Black by Neighborhood	% Native by Neighborhood	% Asian by Neighborhood	% Hawaiian or PI by Neighborhood	% Other by Neighborhood	% Latinx by Neighborhood
11%	9%	71%	23%	1%	8%	0%	4%	8%
8%	13%	44%	52%	1%	5%	0%	3%	7%
29%	17%	77%	18%	0%	5%	0%	2%	7%
8%	13%	48%	51%	0%	2%	0%	2%	7%
6%	5%	42%	27%	0%	23%	0%	9%	13%
7%	4%	79%	18%	0%	7%	0%	1%	6%
9%	11%	55%	39%	1%	6%	0%	4%	7%
6%	7%	58%	36%	1%	4%	0%	5%	10%
16%	20%	59%	39%	1%	5%	0%	2%	9%

As a layperson, I was able to generate data that could serve as metrics in evaluation of achieving Comprehensive Plan goals. I am certain the more capable professionals at the Commission's disposal could do far more with this and other data.

I appreciate the Commission's consideration of these recommendations in light of the body's clear mission to carry out the goals of the Comprehensive Plan.

Thank you,

Barbara Gilbert

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