



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General

ATTORNEY GENERAL
Karl A. Racine

Racial Equity Analysis (REA)

EQUITABLE LAND USE SECTION

PUBLIC ROUNDTABLE – SEPTEMBER 22, 2022

Comprehensive Plan Requirements

Comprehensive Plan (CP) update (effective August 2021) added REA requirement for District agencies:

*Equity Tools for District Agencies, including the Zoning Commission - **Prepare and implement tools, including training, to assist District agencies in evaluating and implementing the Comprehensive Plan's policies and actions through an equity, particularly a racial equity lens. This includes tools to use as part of the development review process, preparation of plans, zoning code updates, and preparation of the capital improvement program, that considers how to apply an equity analysis in these processes, including any information needed. This shall specifically include a process for the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.*** (CP § 2501.8 - emphasis added)

CP's Racial Equity Lens

Throughout the Comprehensive Plan elements, the term “racial equity lens” is used for activities ranging from preparing small area plans to evaluating development decisions. The intent is for District agencies to develop processes and tools tailored to various programs, activities, and decisions, that center and account for the needs of residents of color, to achieve these outcomes:

- *Identify and consider past and current systemic racial inequities;*
- *Identify who benefits or is burdened from a decision;*
- *Disaggregate data by race, and analyze data considering different impacts and outcomes by race; and*
- *Evaluate the program, activity or decisions to identify measures, such as policies, plans, or requirements, that reduce systemic racial inequities, eliminate race as a predictor of results, and promote equitable development outcomes. (CP § 2501.4)*

OAG's Recommended REA Tool Elements

I. Identification of Past and Current Systemic Racial Inequities:

- **Data** - Demographic and economic data disaggregated by race for the census tract of the property for which zoning action is proposed as compared to the District as a whole, based on U.S. Census data available from the State Data Center housed at the Office of Planning (“OP”); and
- **Narrative** - Based on this data, a narrative discussion of the past and current systemic racial inequities in key policy areas in this census tract in comparison to the District as a whole;

II. Identification of Impacts – Identifying and describing:

- The impacts of the proposed zoning action;
- Whether it will disproportionately benefit or burden any particular racial group; and
- The applicant’s outreach to racial groups identified as burdened and any proposed mitigations of such burdens; and

III. Equitable Development Measures - Explanation of the measures proposed by the applicant that would reduce:

- Systemic racial inequities;
- Eliminate race as a predictor of results; and/or
- Promote equitable development outcomes.

I. Past/Current Systemic Racial Inequities - Data

Demographic Data:

- Racial breakdown
- Native to Washington D.C.
- Born in foreign country
- Primary language
- Age breakdown
- Disability
- Children under 18 in household

Income Data

- Median household income
- Median family income
- Unemployment Rate

Housing Data:

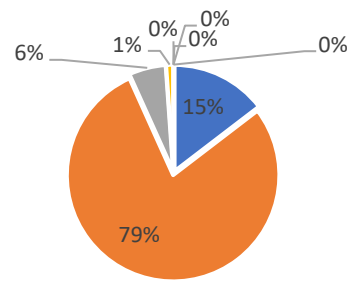
- Total housing units, rental units, and ownership units.
- Units by number of bedrooms
- Median gross property value
- Median gross rent
- DCHA Fair Market Rent
- Households at 30%, 50%, 60%, 80%, and 80+% MFI
- Household size
- Housing burdened households
- Receiving government support for housing costs

Additional Data:

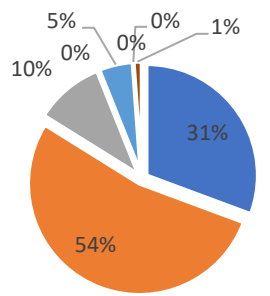
- Relevant to the proposed zoning action
- Relevant to any significant change to the census tract
- Necessary to fully respond to the following narrative section

- | | |
|---|--|
| <ul style="list-style-type: none">• Data should be disaggregated by race• Should be shown at census tract and District level | <ul style="list-style-type: none">• Should show change over time (at least 2000, 2010, 2020)• Should be displayed graphically |
|---|--|

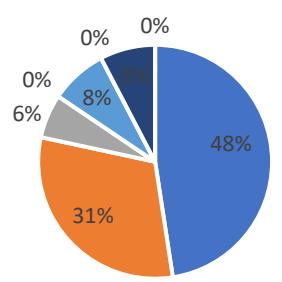
Census Tract Percentage of Population by Race 2000



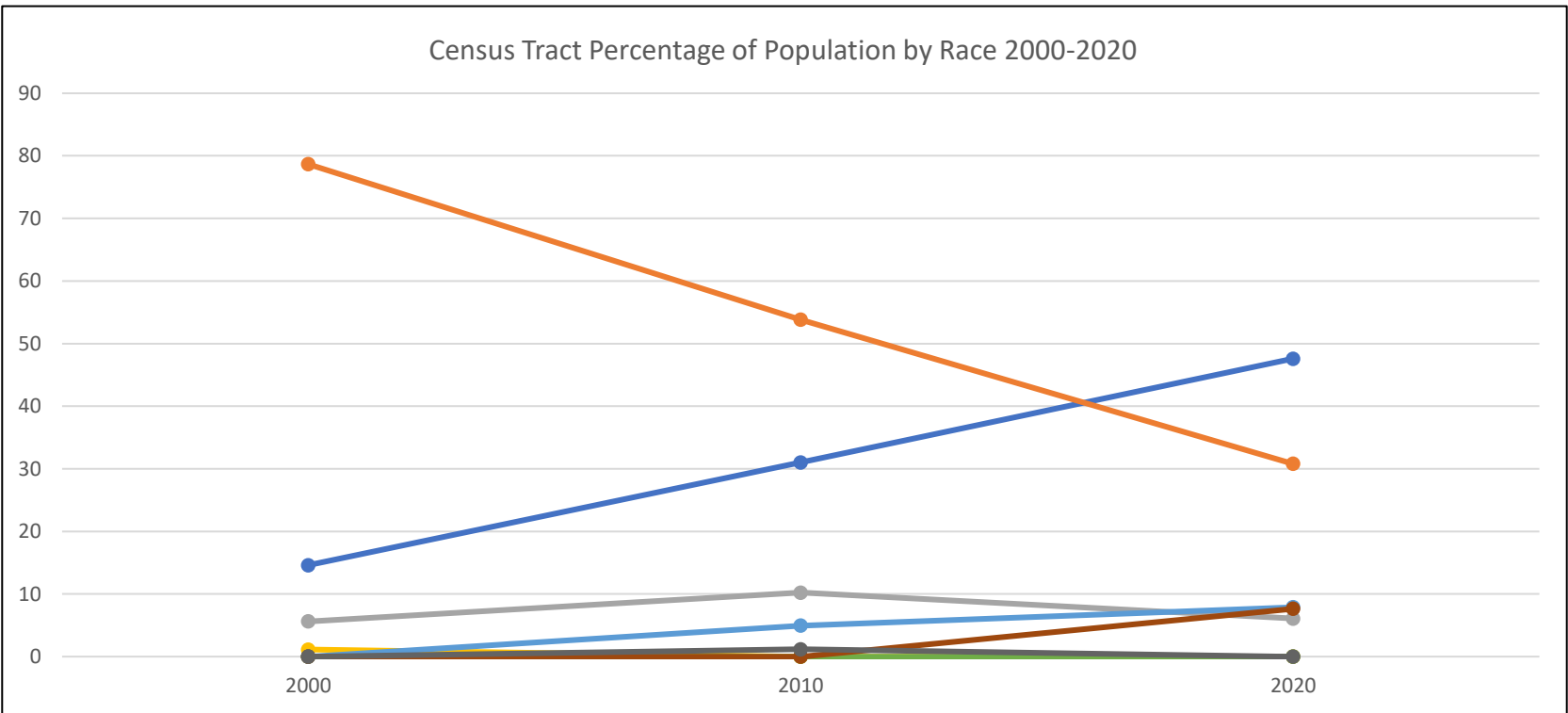
Census Tract Percentage of Population by Race 2010



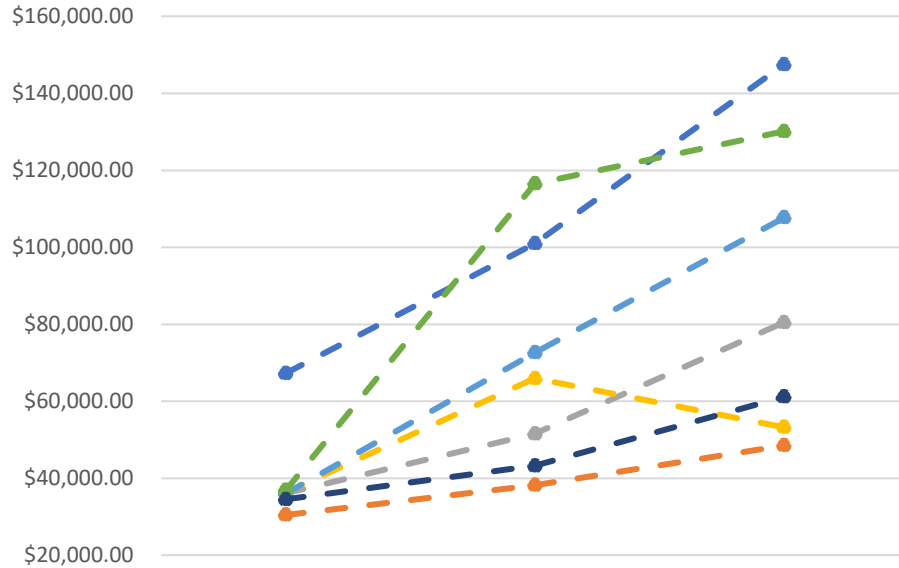
Census Tract Percentage of Population by Race 2020



■ White
 ■ Black
 ■ Hispanic/Latinx
 ■ American Indian
 ■ Asian
 ■ Native Hawaiian/PI
 ■ Other Race
 ■ 2 or more

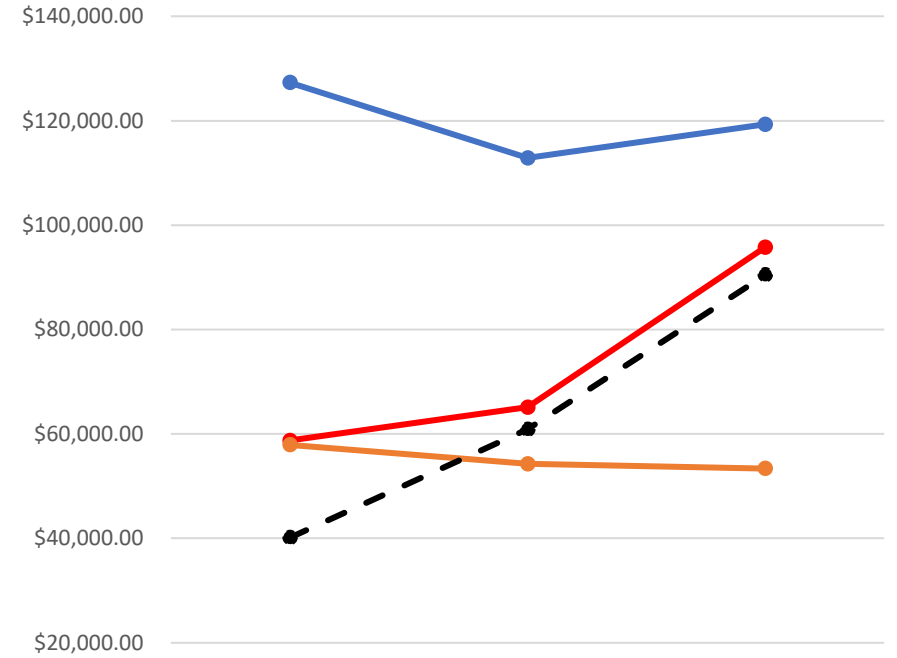


District Wide Median Household Income (MHI) by Race 2000 to 2020



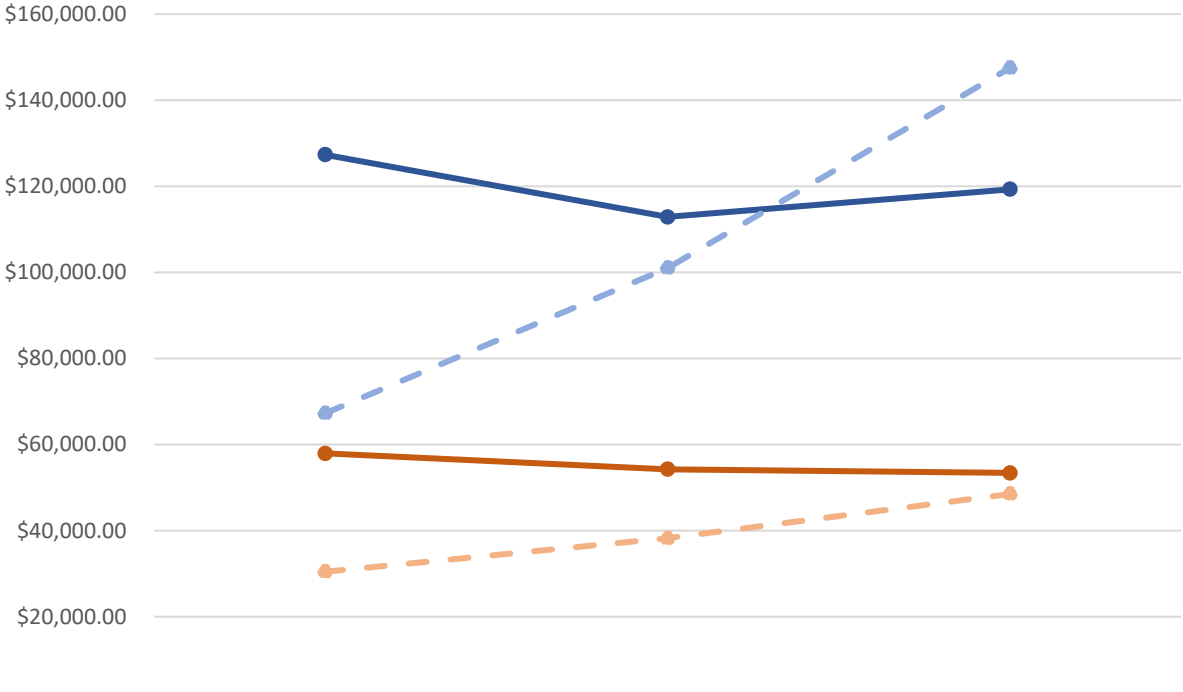
	2000	2010	2020
White	\$67,266.00	\$100,996.00	\$147,488.00
Black	\$30,478.00	\$38,218.00	\$48,515.00
Hispanic/Latinx	\$36,156.00	\$51,569.00	\$80,502.00
American Indian/Alaska Native	\$36,359.00	\$65,938.00	\$53,244.00
Asian	\$36,031.00	\$72,628.00	\$107,732.00
Native Hawaiian/PI	\$36,875.00	\$116,532.00	\$130,104.00
Other	\$34,517.00	\$43,263.00	\$61,145.00

Census Tract MHI by Race vs. Census and District MHI



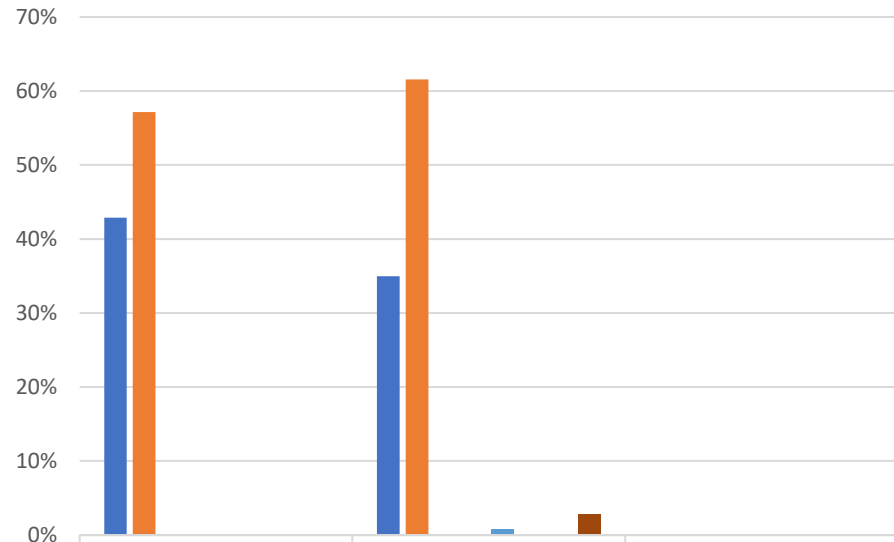
	2000	2010	2020
Census Tract MHI	\$58,750.00	\$65,122.00	\$95,758.00
Census Tract Black MHI	\$57,917.00	\$54,263.00	\$53,393.00
Census Tract White MHI	\$127,308.00	\$112,880.00	\$119,310.00
District MHI	\$40,127.00	\$60,903.00	\$90,482.00

Census Tract MHI by Race vs. District Wide MHI By Race



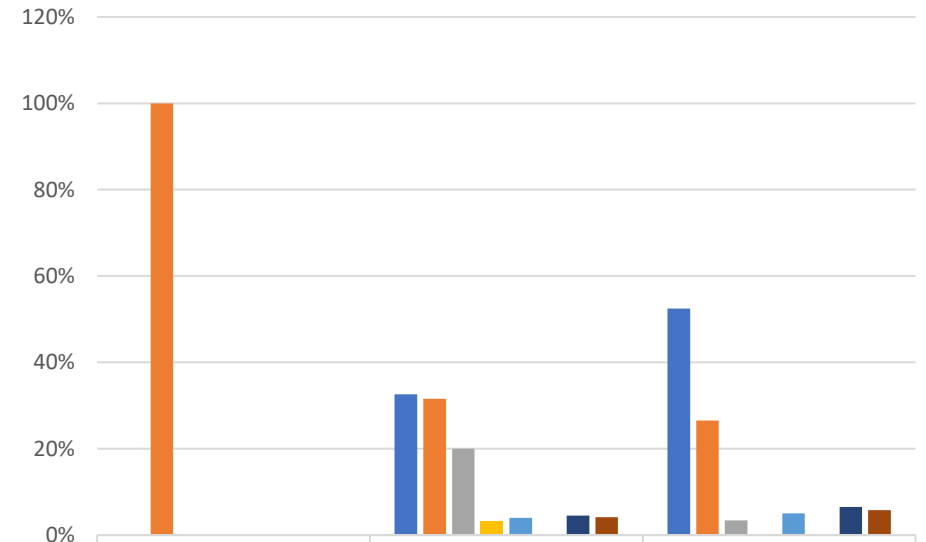
	2000	2010	2020
—●— Census Tract Black Median Houshold Income	\$57,917.00	\$54,263.00	\$53,393.00
- - - ● - - - District Black Median Household Income	\$30,478.00	\$38,218.00	\$48,515.00
—●— Census Tract White Median Household Income	\$127,308.00	\$112,880.00	\$119,310.00
- - - ● - - - District White Median Household Income	\$67,266.00	\$100,996.00	\$147,488.00

Census Tract Ownership Units by Race 2000-2020



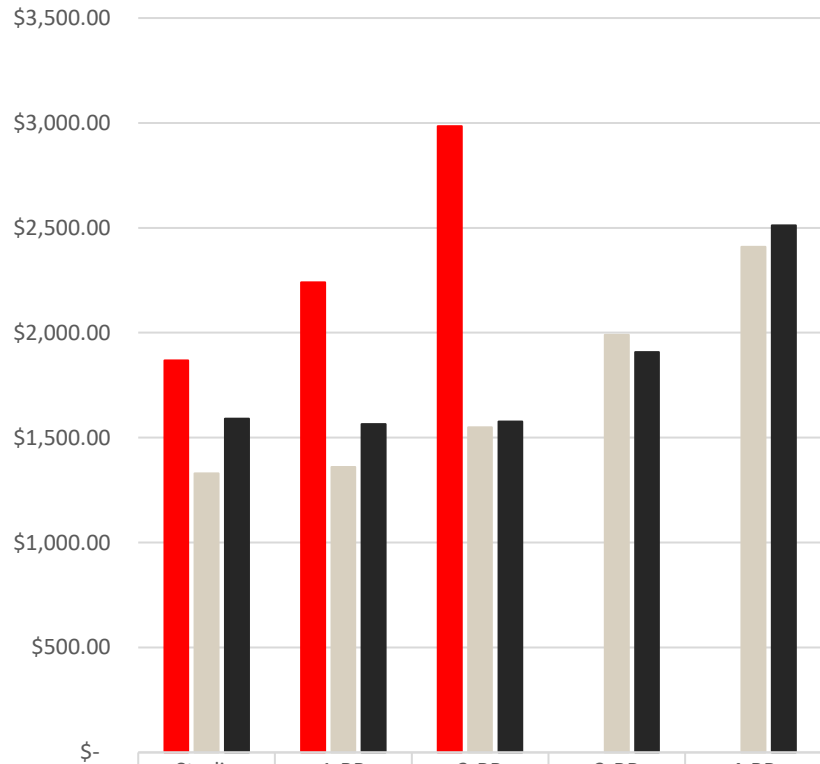
	2000	2010	2020
White	43%	35%	0%
Black	57%	62%	0%
Hispanic/Latinx	0%	0%	0%
American Indian	0%	0%	0%
Asian	0%	1%	0%
Native Hawaiian/PI	0%	0%	0%
Other Race	0%	0%	0%
2 or More Races	0%	3%	0%

Census Tract Rental Units by Race 2000-2020

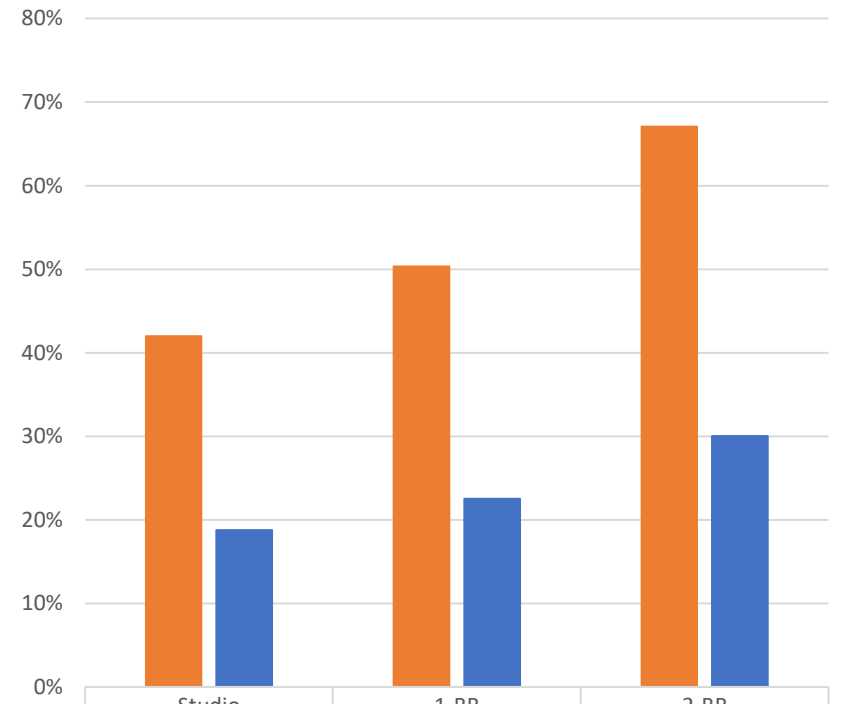


	2000	2010	2020
White	0%	33%	52%
Black	100%	32%	27%
Hispanic/Latinx	0%	20%	3%
American Indian	0%	3%	0%
Asian	0%	4%	5%
Native Hawaiian/PI	0%	0%	0%
Other Race	0%	5%	7%
2 or More Races	0%	4%	6%

2020 Median Gross Rent Comparison



Census Tract Median Gross Rent as % of Median Household Income

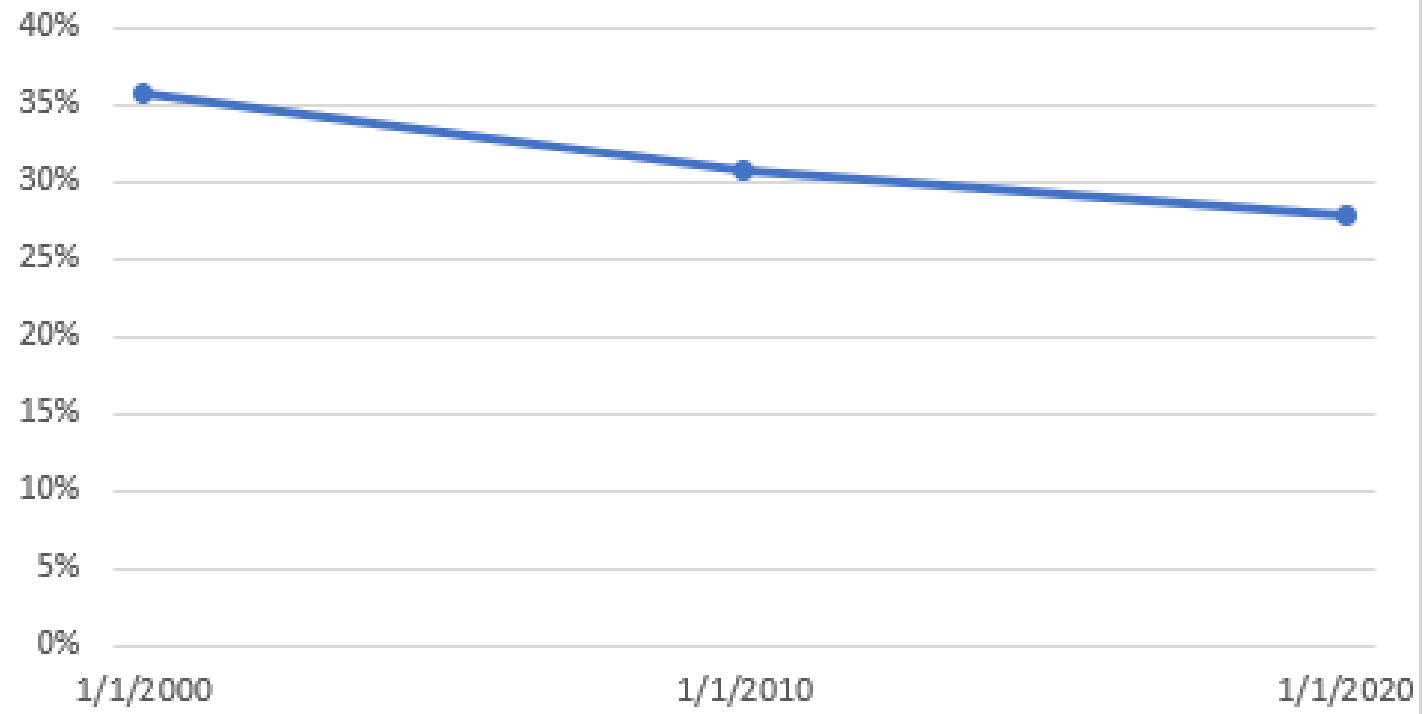


	Studio	1-BR	2-BR
Median Gross Rent % of Median Black Household Income	42%	50%	67%
Median Gross Rent % of Median White Household Income	19%	23%	30%

Notes on Data:

DCHA Fair Market Rent is determined based on the zip code of the property.
 There were no 3-bedroom or 4-bedroom units in the census tract as of 2020.

Census Tract - Native Washingtonian Population



I. Past/Current Systemic Racial Inequities - Narrative

-
- **Historical Patterns for Census Tract and Local Community** - Describe the history of the neighborhood relevant to its current state, including historic sources of displacement such as Urban Renewal programs, highway construction, and redlining, etc.
 - **Access to Housing & Affordable Housing** - Describe the availability of affordable housing units, the median home values vis a vis median rents, the size of units vis a vis the size of households, the number of ownership units vis a vis rental units etc., including the changes to the Census tract since 2000
 - **Access to Environmental Quality** - Describe the environmental quality including, access to green space and natural resources, air and water quality/pollution levels, the presence of any industrial facilities, other major sources of pollution, etc., including the changes to the Census tract since 2000
 - **Access to Health** - Describe the access to medical care and facilities, existing health disparities, prevalence of disease due to environmental factors, etc., including the changes to the Census tract since 2000
 - **Access to Transportation** - Describe the transportation access, including proximity to Metrorail and Priority Metrobus lines, availability of Capital Bikeshare stations, and other means of transit, including the changes to the Census tract since 2000
 - **Access to Opportunity** - Describe the access to education facilities, employment areas, neighborhood-serving commercial areas (such as grocery stores, laundries, etc.), high-speed internet, etc., including the changes to the Census tract since 2000
 - **Access to Public Facilities** - Describe the access to public amenities such as public recreation centers, public parks and open space, public libraries, etc., including the changes to the Census tract since 2000
 - **Changes to Census tract** - Describe any significant change to the Census tract since the prior Census (e.g., change in boundaries or land area)
 - **Specific Information** - Describe any other aspects of the neighborhood and its historical development that are relevant to the proposed zoning action

II. Impacts of Proposed Zoning Actions

- Identify and describe:
 - The impacts of the proposed zoning action, with specific reference to the categories referenced in the narrative section of Part I;
 - Whether it will disparately benefit or burden any particular racial group; and
 - The applicant's outreach to racial groups identified as burdened and any proposed mitigations of such burdens. Does this outreach reflect the racial diversity of the community? Does it reflect the diversity of viewpoints in the community? Are there any communities that the applicant was not able to contact? What came of these discussions?

FIGURE 5 The MFI for Black District families is \$46,201. This means that 50% of Black families in the District can afford the apartments highlighted in blue below, representing 18% of the affordable units.

	Household Size	30% MFI	50% MFI	80% MFI	120% MFI
Studio	1	17	50	47	79
1 Bedroom	2	16	68	50	114
2 Bedroom	3	6	11	13	24
3 Bedroom	4	6	16	15	no units
4 Bedroom	5	3	2	5	no units

Example – 2 Patterson Disposition Affordable Housing Analysis

FIGURE 6 The MFI for white District families is \$143,150. This means that 50% of white families in the District can afford the apartments highlighted in green below, representing 100% of the affordable units.

	Household Size	30% MFI	50% MFI	80% MFI	120% MFI
Studio	1	17	50	47	79
1 Bedroom	2	16	68	50	114
2 Bedroom	3	6	11	13	24
3 Bedroom	4	6	16	15	no units
4 Bedroom	5	3	2	5	no units

III. Equitable Development Measures

- Identify and describe the measures proposed by the applicant that would:
 - Reduce systemic racial inequities,
 - Eliminate race as a predictor of results, and
 - Promote equitable development outcomes?
- Did the applicant discuss these measures as part of the outreach to groups and communities identified above as likely to be burdened by the proposed zoning action? What responses did the applicant receive?

OAG Recommended REA Procedure

Builds on standard zoning procedure:

- 1) **Applicant/Petitioner** – completes a REA as part of its initial application/petition and burden of proof including Census data
- 2) **OP**- as part of its analysis of the application/petition for compliance with the Zoning Regulations, including CP consistency, completes its own REA in response to the Applicant/Petitioner's completed REA
- 3) **Zoning Commission** - in its deliberations and final order or Notice of Final Rule Making, establishing the legal justification for its decision, conducts its own REA in response to those provided by the Applicant/Petitioner and OP

REAs would all be filed into the case record to allow for public review and comment and to allow members of the public to file their own REAs.

Displacement Risk Indicators and Maps

Anti-displacement in the CP

The CP refers more than 75 times to displacement, defined as:

- *Physical displacement* as households must move when the properties they occupy are redeveloped,
- *Economic displacement* as housing cost increases in the neighborhood force the household to find other housing options, and
- *Cultural displacement* as residents lose a sense of belonging or shared identity in their neighborhood due to neighborhood change or growth. (CP § 510.3a - emphasis added)

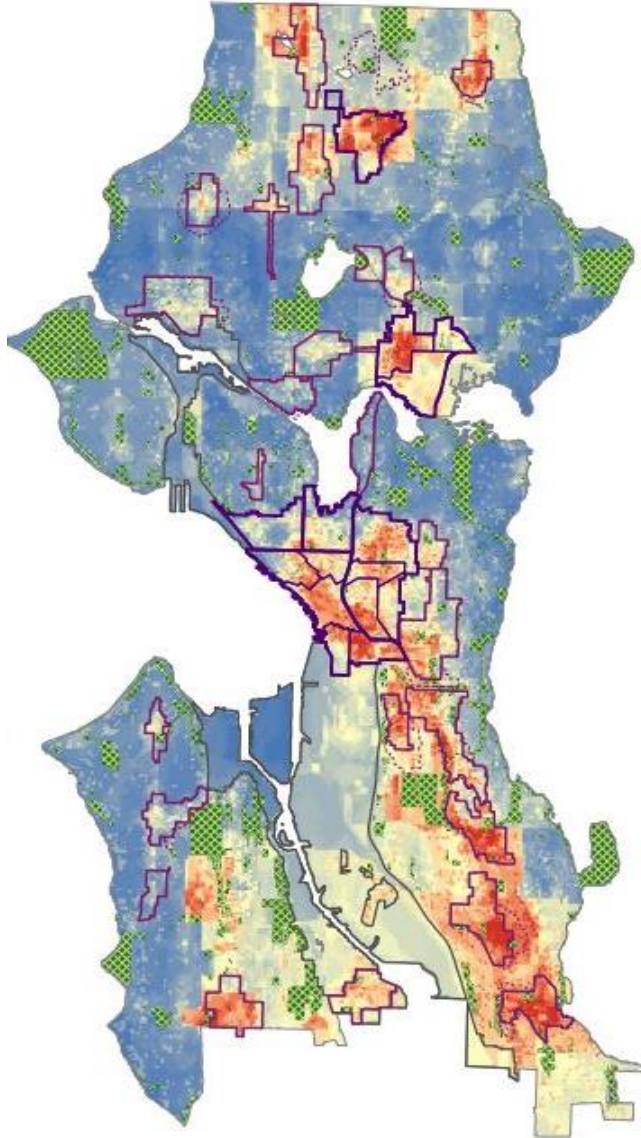
Action H-2.1.I: Anti- Displacement Strategy

“Track neighborhood change, development, and housing costs to identify areas of Washington, DC that have experienced, are experiencing, or are likely to experience, displacement pressures. **Collect, disaggregate, and monitor data to consider income and racial characteristics of the neighborhoods and households affected by or at risk of displacement.**”

Conduct racial equity analyses that identify the policies and underlying forces contributing to any inequities. Such analyses must consider different sources of displacement pressures, including a lack of new housing in high-demand neighborhoods and effects new development may have on housing costs in adjacent areas. Monitor best practices and identify new strategies for displacement prevention. Use the information to create a **District-wide anti-displacement strategy, prepare reoccurring reports, improve program performance, and identify targeted areas within which to deploy resources to prevent displacement and help residents with the highest displacement risks stay in their neighborhoods. Examine ways to support low-income residents in areas that have already experienced rapid displacement, such as those in Mid-City and Near Northwest.”**
(CP § 510.22 – emphasis added)

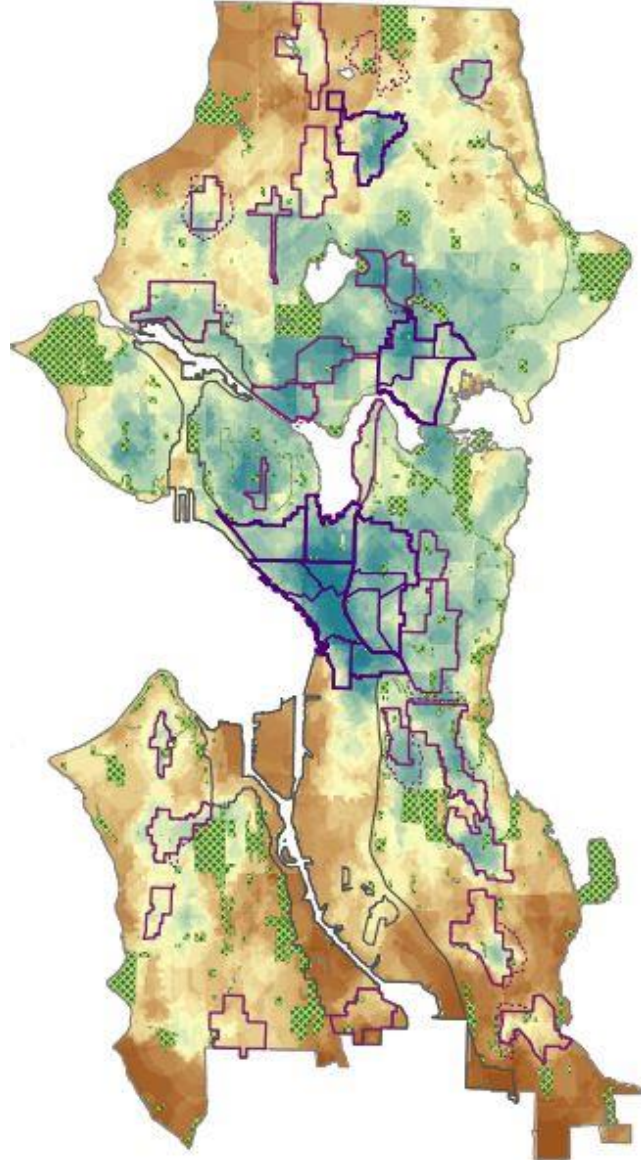
Seattle

Displacement Risk Index



- High displacement risk
- Low displacement risk
- Urban Center
- Urban Center Village
- Hub/Residential Urban Village
- Potential urban village expansion area
- Manufacturing & Industrial Center
- Park

Access to Opportunity Index



- High access to opportunity
- Low access to opportunity
- Urban Center
- Urban Center Village
- Hub/Residential Urban Village
- Potential urban village expansion area
- Manufacturing & Industrial Center
- Park

Seattle's Indicators

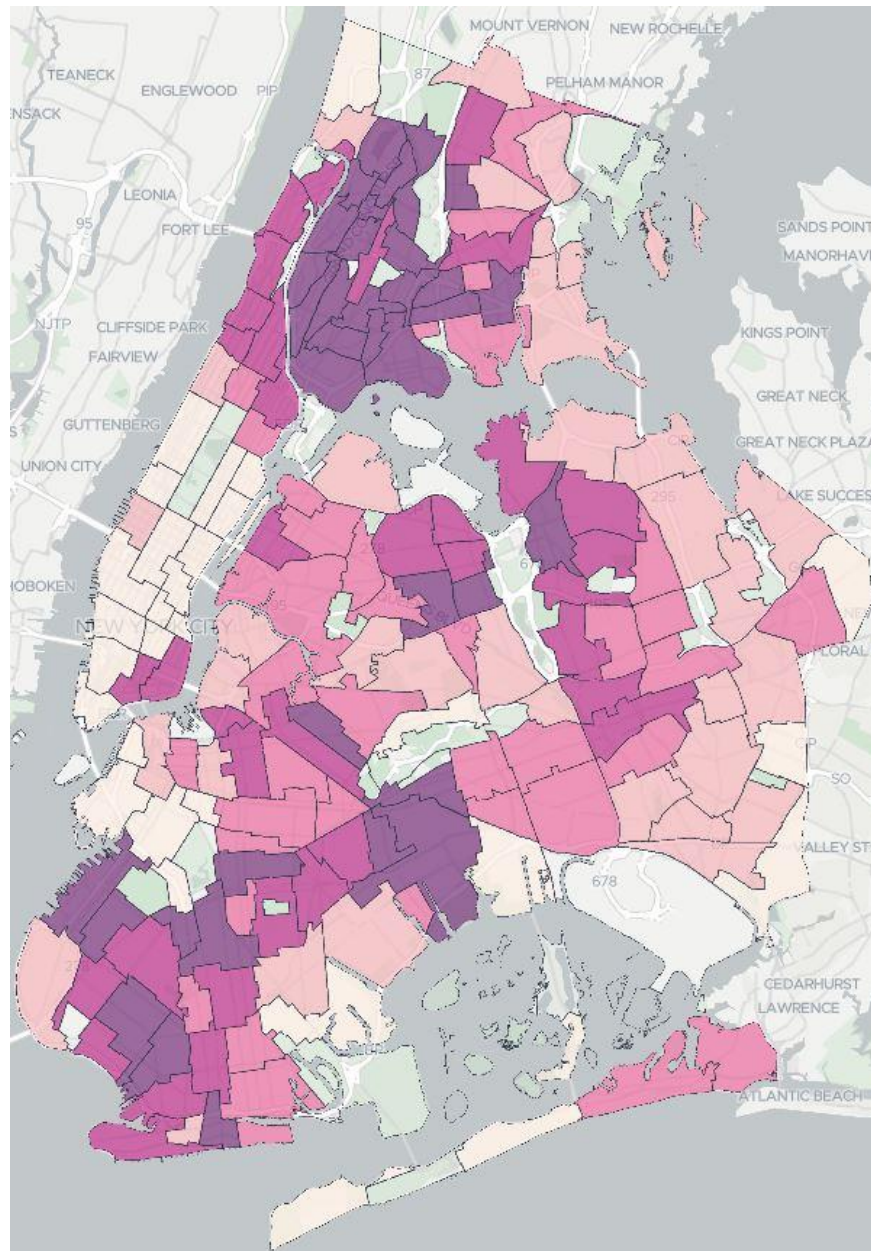
Displacement Risk Index

- People of color (%)
- Linguistic isolation
- Educational attainment
- Housing tenancy
- Housing cost-burdened households
- Severely housing cost-burdened households
- Housing income
- Proximity to transit
- Proximity to current or future Link Light Rail and Streetcar
- Proximity to core businesses
- Proximity to civic infrastructure
- Proximity to high-income neighborhood
- Proximity to job center
- Development capacity
- Median rent

Access to Opportunity Index

- School performance
- Graduation rate
- Access to college or university
- Proximity to a library
- Proximity to employment
- Property appreciation
- Proximity to transit
- Proximity to current or future Link light rail or streetcar
- Proximity to a community center
- Proximity to a park
- Sidewalk completeness
- Proximity to a health care facility
- Proximity to a location that sell produce

New York City



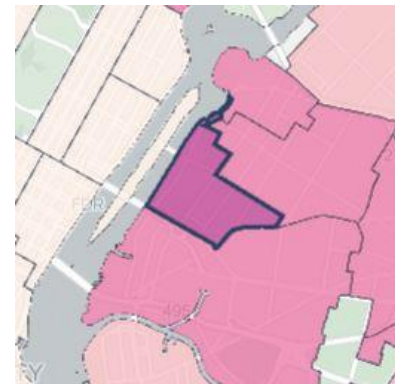
Displacement Risk Map

-  Highest
-  Higher
-  Intermediate
-  Lower
-  Lowest

NYC's Displacement Risk Map

Queensbridge-Ravenswood-Long Island City

Higher



Population Vulnerability: Higher

NON-WHITE POPULATION

80.5%

POPULATION WITH INCOME BELOW 200% OF FEDERAL POVERTY RATE

56.3%

3.5% margin of error

LIMITED-ENGLISH SPEAKING POPULATION

28%

2% margin of error

HOUSEHOLDS WITH SEVERE RENT BURDEN

Smaller proportion of severely rent burdened households than City

Housing Conditions: Intermediate

HOUSING WITH 3+ MAINTENANCE DEFICIENCIES

No statistical difference in 3+ maintenance deficiencies compared to City

HOUSING THAT IS NOT INCOME-RESTRICTED

61.9%

HOUSING THAT IS NOT RENT-STABILIZED

No statistical difference in rent stabilized households compared to City

RENTER-OCCUPIED HOUSING UNITS

92.8%

1.6% margin of error

Market Pressure: Higher

RENT CHANGE VS. CITY

Equivalent rent change to City

RESIDENTIAL PROPERTY PRICE APPRECIATION 2000-2020

3.7

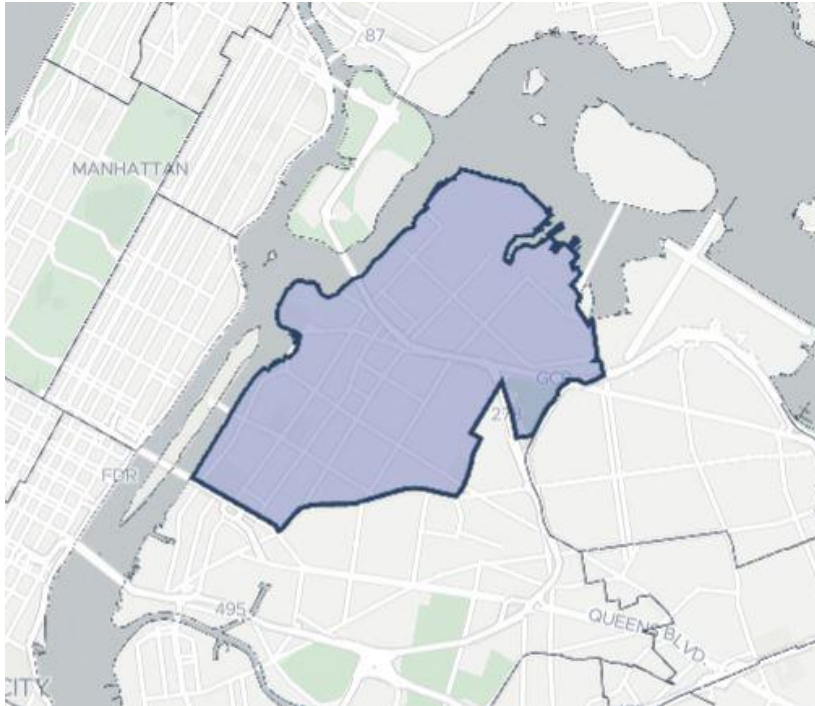
BACHELORS DEGREE OR HIGHER CHANGE

Larger percent change than the City

ADJACENT NEIGHBORHOOD PRESSURE

Adjacent to neighborhoods with high Market Pressure scores

NYC Community Data



PUMA 4101

Astoria & Long Island City

Approx. Queens CD 1



Demographic Conditions



Household Economic Security



Housing Affordability, Quality, and Security

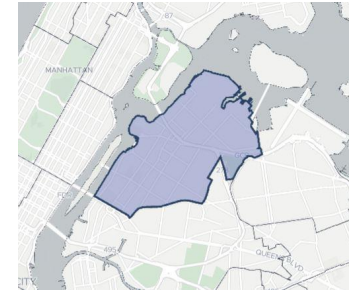


Housing Production



Quality of Life and Access to Opportunity

NYC Community Data



Demographic Conditions

Note: Data shown in gray have poor statistical reliability. Learn more about our [data sources](#).

Mutually Exclusive Race/Hispanic Origin

	CENSUS SF1, 2000		CENSUS SF1, 2010		CENSUS PL 94-171, 2020	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Total population	192,689	100.0%	174,174	100.0%	186,153	100.0%
Asian non-Hispanic	25,726	13.4%	25,197	14.5%	27,594	14.8%
Black non-Hispanic	13,649	7.1%	12,388	7.1%	12,923	6.9%
Hispanic	52,997	27.5%	47,318	27.2%	47,189	25.3%
White non-Hispanic	85,098	44.2%	83,480	47.9%	87,922	47.2%
Non-Hispanic of some other race or combination of races	15,219	7.9%	5,791	3.3%	10,525	5.7%

Limited English Speaking Population

	CENSUS PUMS, 2000		ACS PUMS, 2008-2012		ACS PUMS, 2015-2019	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Population 5 years and over	179,129	100.0%	161,350	100.0%	155,512	100.0%
Speak English less than "very well"	60,592	33.8%	43,508	27.0%	34,740	22.3%

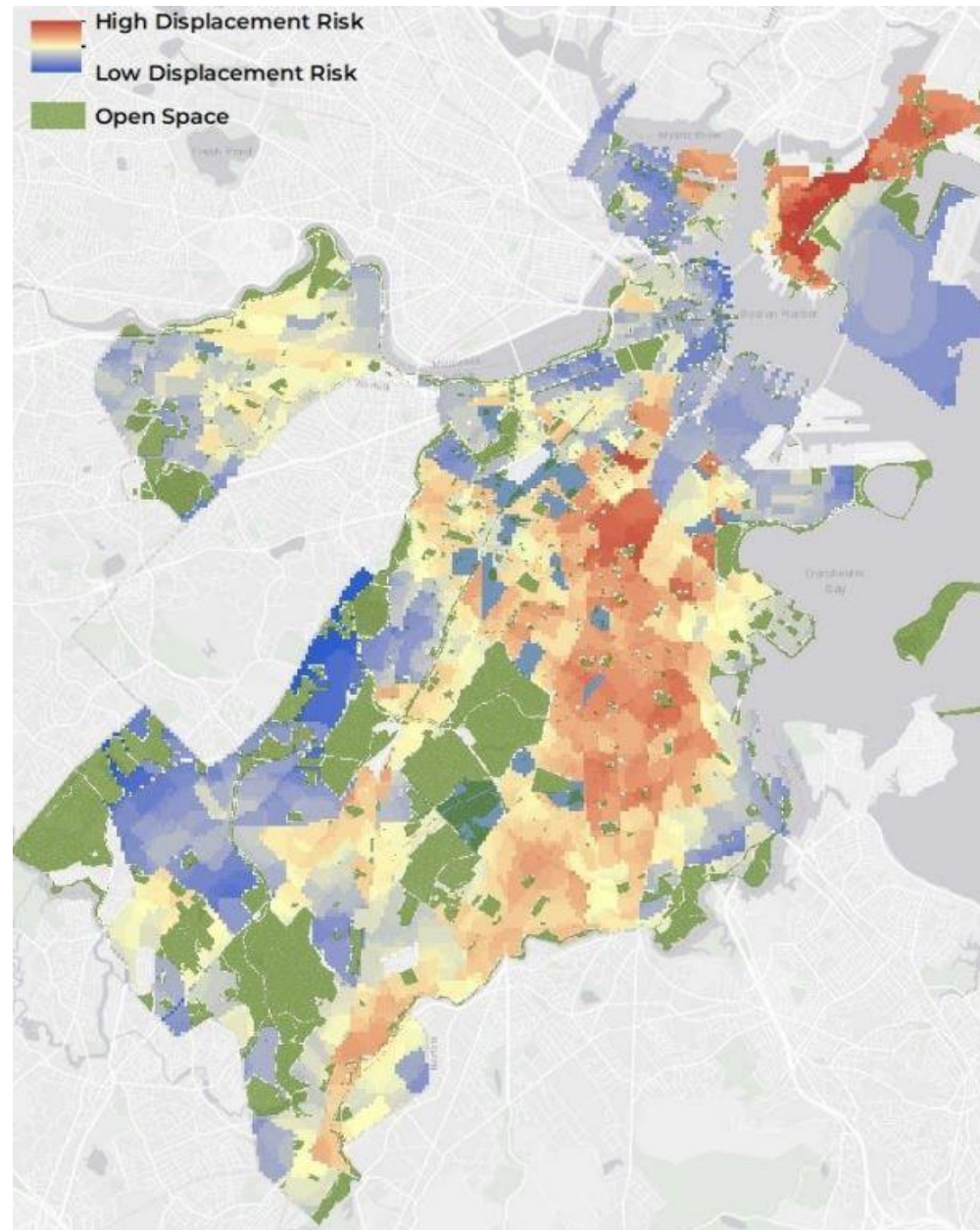
Age

	CENSUS PUMS, 2000		ACS PUMS, 2008-2012		ACS PUMS, 2015-2019	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Total population	190,035	100.0%	169,153	100.0%	163,980	100.0%
Under 16 years	33,541	17.6%	23,452	13.9%	22,249	13.6%
16 to 64 years	133,400	70.2%	125,218	74.0%	119,440	72.8%
65 years and over	23,094	12.2%	20,483	12.1%	22,291	13.6%
Median age (years)	34.1		34.8		35.3	

Foreign-Born Population

	CENSUS PUMS, 2000		ACS PUMS, 2008-2012		ACS PUMS, 2015-2019	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
Total population	190,035	100.0%	169,153	100.0%	163,980	100.0%
Foreign-born	92,489	48.7%	71,997	42.6%	62,053	37.8%

Boston



Boston's Displacement Risk Index Indicators

High concentration of income-restricted housing (> 80%)

Race/ethnicity

Renter tenancy

Housing cost burden (renters)

Housing cost burden (owners)

Low educational attainment

Concentration of college students

Low English fluency

Access to rapid transit

Proximity to high-income areas

Lack of income restricted housing

Rent appreciation

Commercial development

Potential development sites


Condo conversions

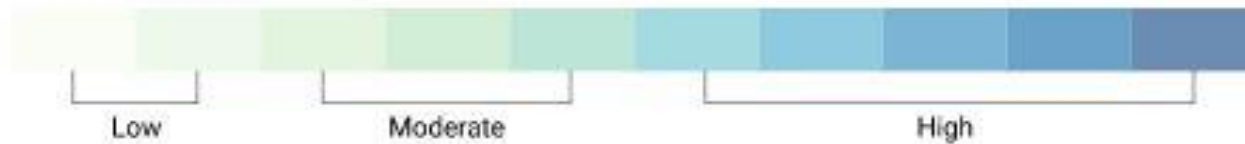
Property appreciation

Boston's Community Profile

Project Address: 257 Lamartine Street, #1-2, Jamaica Plain,
Massachusetts, 02130

Total Households in Project Area: 2866

Historical Exclusion Level:  High

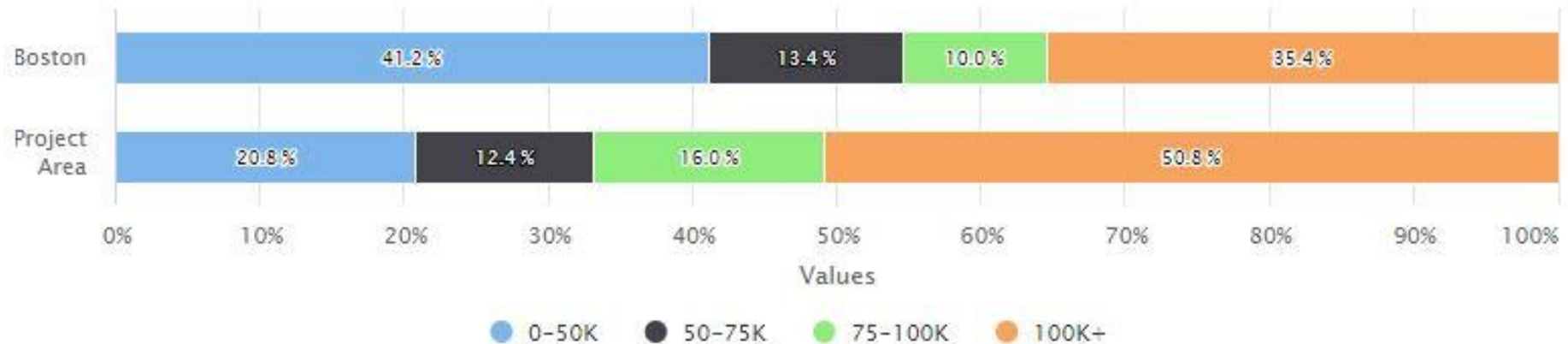


Boston's Community Profile

Boston Household Characteristics

	Percent of Housing Units that are Renter Occupied	Percent of Households spending 30% or more of Household Income on rent	Percent of Households spending more than 50% of Household Income on rent	Percent of Housing Units that are Income-Restricted	Percent of Households Using Mobile Housing Vouchers, BHA
Project Area	50.1%	33.5%	10.4%	12.2%	2.2%
Boston	65.9%	48.9%	25.8%	20.6%	4.7%

Household Income Buckets



Boston's Community Profile

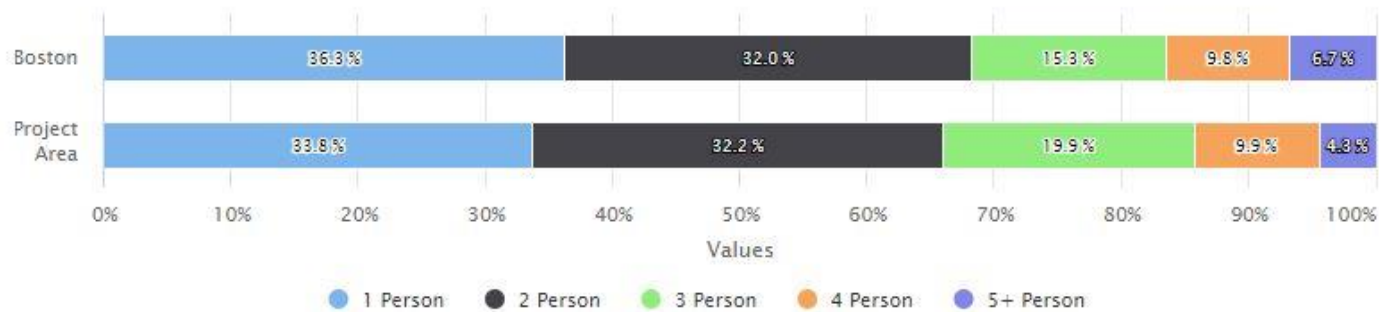
Household Composition Characteristics

Household Type	Married couple families	Other families	Non-family, householder living alone	Non-family, householder not living alone	Households with Children under 18	Households with a member with a disability
Project Area	37.6%	6.1%	33.8%	22.5%	18.1%	15.8%
Boston	28.0%	20.2%	36.3%	15.5%	22.4%	22.7%

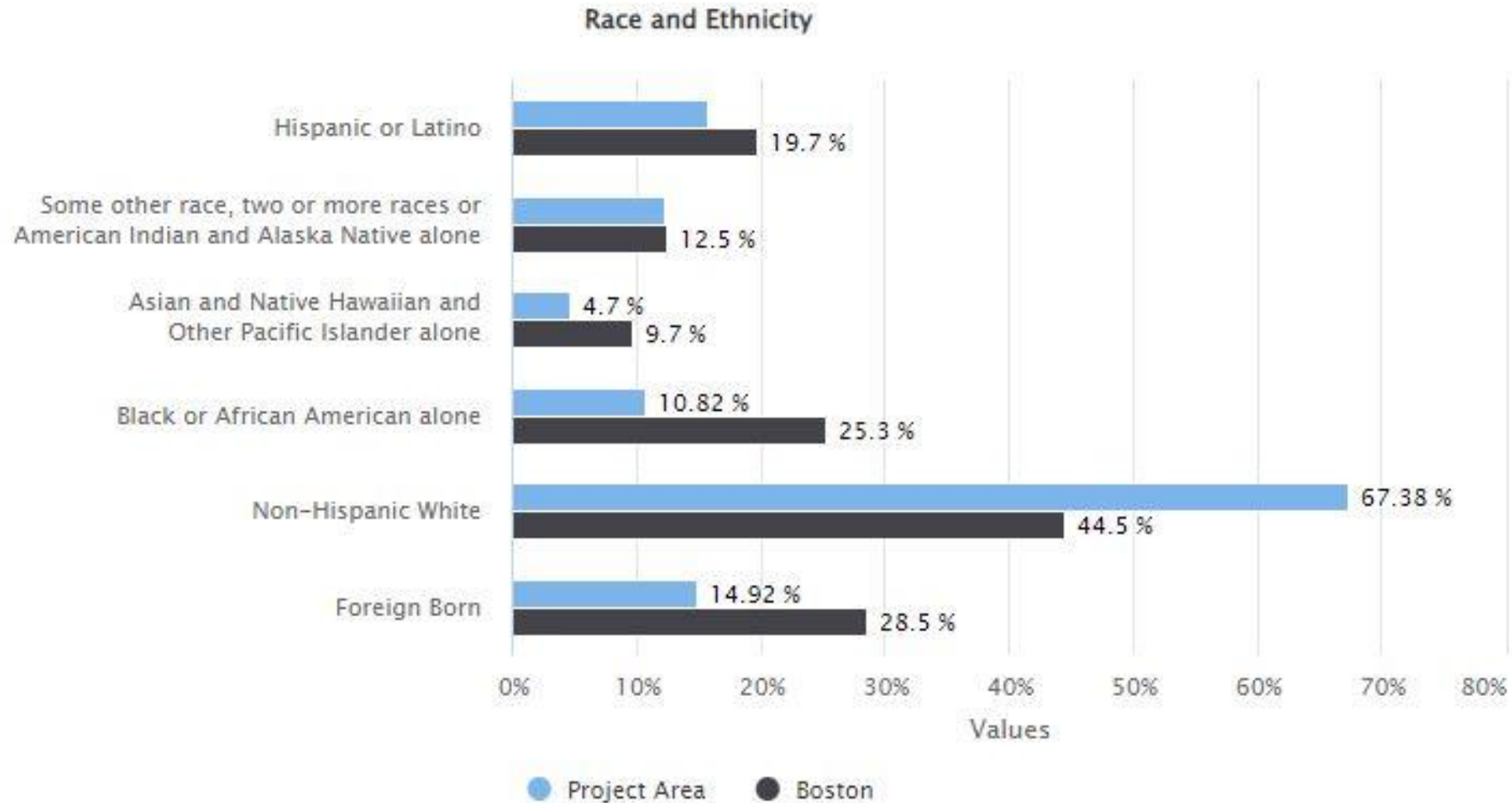
Unit Sizes

Mix of Units	Studio or 1-Bedroom	2-Bedroom	3-Bedroom	4+ Bedroom
Project Area	19.7%	39.6%	30.7%	10%
Boston	31.7%	34.6%	23.1%	10.7%

Household Size



Boston's Community Profile



OAG Recommendations for Displacement Risk Map

- Create a displacement risk map to be integrated into the Zoning Commission's REA process; and
- Incorporate the displacement risk map, together with the Census data needed for the REA, in an overlay on the Zoning Map

Next Steps

OAG respectfully requests that the Commission:

- Leave the record open for at least 48 hours to allow for the submission of additional testimony and comments;
- Request that OP:
 - Prepare a text amendment formalizing the REA tool and process; and
 - Develop a displacement risk map for eventual incorporation into the REA process.