



**NW Opportunity Partners**  
CDC

Expanding affordable housing and economic opportunities in NW DC

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**Zoning Commission Virtual Public Roundtable**

**Case No. 22-RT1**

**September 22, 2022**

Good Afternoon, my name is Deirdre Brown. I am a 3<sup>rd</sup> generation Washingtonian, an affordable housing advocate, Ward 3 resident and small business owner. I have been in the real estate industry as a Realtor and title company owner for over two decades. Like many of us, I have watched the gentrification and displacement as well as lack of affordability in the District grow to the levels that we see today. I am speaking today on behalf of the NW Opportunity Partners Community Development Corporation in opposition to the Zoning Commission's draft of the Racial Equity tool.

The DC Comprehensive Plan requires racial equity analysis within DC Planning and Zoning by evaluating all zoning actions through a racial equity lens. The Zoning Commission's draft of the Racial Equity Tool as it stands today, is insufficient as a process for evaluating all actions through a racial equity lens. It does not meet the Comprehensive Plan requirements due to its lack of substance and as drafted will not lead to meaningful change and equitable development outcomes.

The Racial Equity Tool as drafted evaluates four topics, direct displacement, housing, physical, and access to opportunity. The corresponding questions for each topic area are too vague to be effective. At the very least the following should be included in the Racial Equity Tool:

- (1) Identity and consider past and current systemic racial inequities by developing data tools that track and measure progress towards closing the racial wealth gap and housing affordability based on the context of the median income for Black and Brown families in target areas. By documenting historic community level inequities, we can better predict the impact of proposed projects and address the inequities during the planning stages of these projects.
- (2) Clearly and distinctly identify who benefits or is burdened from a decision. A tool must be created to assess displacement risk with specific questions that are used to guide the assessment. Factors to include when evaluating high displacement risk projects should be indicators such as race, income, level of education, percentage of renters, and housing cost burden. The evaluation of displacement risk must include surrounding areas, not just the direct displacement site. In addition, applicants that have projects in a



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displacement risk area must demonstrate what steps have been taken to address displacement and advance equity, before coming to the Zoning Commission for approval. This information can be provided by mandating that a racial equity and social justice impact statement is submitted by the applicant.

- (3) Once a baseline is established, there needs to be a way of tracking the effectiveness of interventions and measure the progress towards the goal of racial equality. This can be achieved thru data analysis as well as community review and feedback.
- (4) Finally, it is imperative that any racial equity analyses that is implemented be codified through a zoning text amendment and conducted for all zoning decisions, not just contested cases.

Thank you for your time and attention.