

Re: Racial Equity Toolkit
Dear Zoning Commission,

We are writing to express our support for the Racial Equity tool. Moreover, we ask that it not itself become a barrier to breaking down the racist processes that have traditionally been seen in residential zoning in DC. Many of the existing hallmarks of D.C. Zoning, such as the prevalence of single family exclusive zoning in Upper Northwest¹, as well as bans on larger apartments, are common tools of “opportunity hoarding²”.

Furthermore, there is a large body of work from scholars clearly identifying [“anti-density zoning increases black residential segregation in U.S. metropolitan areas by reducing the quantity of affordable housing in white jurisdictions”](#). While adding processes to safeguard the interests of traditionally excluded POC and African-American populations is clearly critical, it is important that we not create a process that ultimately perpetuates some of those original harms again.

As I write today, many of the policies based on segregation (single family zoning) and environmental racism are still present in our land use. Adding affordable supply of modern and family sized units is critical to populations that already struggle with workplace discrimination.

In creating this tool, there are many second hand effects that may be hard to judge on first glance. For instance, would adding additional market rate housing supply decrease or increase equity?

Among the future projects and zoning changes the Zoning Council and Council more generally will consider, it is important we benchmark not off of perfection, but off of the deeply imperfect present. Individual market rate developments or deeply affordable developments may not be perfect, but they add supply and amenities, which help remedy the current lack of amenities in ANC's that are more deeply segregated.

The benefits of this tool are most strong when it allows the benefits of projects to shine, not when imperfection is used as a tool to block development.

The evidence based approach to solving segregation and improving equitable economic outcomes needs to include removing the rules that keep us segregated in the present. Many of these outcomes are in fact not natural, but are a byproduct of very unnatural rules, such as the prevalence of single family zoning on 59% of D.C.'s land³.

Finally, one problem with potential changes to Map and Text amendments mandating mandatory expansions of legal process could result in less housing being built. The more process and negotiation there is for housing to be built, the less housing will be built. Similarly, improvements to housing stock and amenities which on average improve equity should face a streamlined process, rather than long and complicated sessions which may counterintuitively

¹https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/007_Single%20Family%20Housing%20Report.pdf

² <https://www.theguardian.com/inequality/2017/jul/15/how-us-middle-classes-hoard-opportunity-privilege>

³https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/007_Single%20Family%20Housing%20Report.pdf Figure 3.

result in *less* housing being built. The goal is to improve equity and housing stock, not to subject every building to a drawn out debate (this is why housing in D.C. is so expensive).

Signed,

Michael Starnes, DC Yimbys

Recommendations:

1. Keep the tool and process adopted **simple enough** not to become a barrier to quickly creating affordable housing
2. **Reduce procedural uncertainty**, which can be abused to protect exclusionary zoning⁴
3. Acknowledge that some **outcomes are hard to predict**, and be okay with estimated figures. (eg. data in small neighborhood blocks truly may not be available)
4. Benchmark **off of progress**, not off of perfect Key Performance Indicators
5. Minimize **potential for abuse** by those seeing to block affordable housing (eg. “Nimbyism”), which perpetuates exclusionary outcomes

⁴<https://nextcity.org/urbanist-news/apartheid-by-another-name-how-zoning-regulations-perpetuate-segregation>