



Racial Equity Tool

DC Zoning Commission

Acknowledgement: The Commission acknowledges that the development and implementation of its Racial Equity Tool is an evolving process and expects the Tool will continue to change and improve over time with increased use by the Commission, the Office of Planning, Applicants/Petitioners, and affected community members.

Recent updates to the Comprehensive Plan require the Zoning Commission to evaluate all zoning actions through a racial equity lens as a part of its overall Comprehensive Plan consistency analysis. The Zoning Commission will use the contents in each Part of this tool in its evaluation along with the direction immediately below:

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” suggests that equity analysis is intended to be based on Comprehensive Plan policies, and part of the Commission’s consideration of whether a zoning action is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about the zoning action’s equitable impact. Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where the provision of affordable housing, avoiding displacement of existing residents, and creating access to opportunity are priorities.

The Comprehensive Plan **Framework Element** states that equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities, but is not the same as equality. 10-A DCMR § 213.6. Further, “[e]quitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices [and] holistically considers land use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, healthcare, technology, workforce development, and employment opportunities.” 10-A DCMR § 213.7 The District applies a racial equity lens by targeting support to communities of color through policies and programs focusing on their needs and eliminating barriers to participate and make informed decisions. 10-A DCMR § 213.9

The Comprehensive Plan **Implementation Element** provides guidance to help the Commission apply a racial equity lens to its decision making. Specifically, the Implementation Element states that “[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the Citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas in the District.” 10-A DCMR § 2501.6.

Part One: Racial Equity Analysis Submissions (Guidance regarding the Comprehensive Plan)

The Citywide and Area Elements of the Comprehensive Plan that explicitly focus on advancing equity are listed below. The Zoning Commission expects a discussion of these elements, as applicable, along with a discussion of Small Area and City Center Plans, as applicable, **from the Applicant/Petitioner and the Office of Planning** in racial equity analysis submissions that analyze a zoning action through a racial equity lens. See hyperlinks to specific Citywide and Area Elements, and Small Area Plans and Center City Plans below¹. (Note: These Elements and Plans are not intended to be an exhaustive list of where and how the Comprehensive Plan addresses equity, race, and racial equity. Often policies will impact equity but not explicitly mention race or racial equity.)

¹ The DC Office of Planning’s [Equity Crosswalk](#), which is referenced in the Comprehensive Plan, cites over 100 policies within the Comprehensive Plan that address equity.



<u>Citywide Elements</u>	<u>Area Elements</u>
Land-Use Transportation Housing Economic Development Urban Design Historic Preservation Community Services and Facilities Educational Facilities Infrastructure Arts and Culture Environmental Protection Parks Recreation and Open Space	Capitol Hill Central Washington Far Northeast Southeast Far Southeast Southwest Lower Anacostia Waterfront Near Southwest Mid-City Near Northwest Rock Creek East Rock Creek West Near Northwest Upper Northeast
<u>Plans</u>	
Small Area Plans	Center City Plans

Part Two: Applicant/Petitioner Community Outreach and Engagement

The Zoning Commission expects racial equity analysis submissions that analyze a zoning action through a racial equity lens to include a detailed discussion **from the Applicant/Petitioner** on community outreach and engagement efforts. Each heading below lists a step/component of a community outreach/engagement effort. Under each heading is a set of questions designed to help the Applicant/Petitioner define the community that will be affected by the zoning action, develop an outreach plan to specifically target that community, and incorporate community input into the proposed zoning action. As applicable to the zoning action, the Applicant/Petitioner should address/answer the questions below.

Note: Not every question suggested below will be applicable to every zoning action.

The Zoning Commission firmly believes that community outreach and engagement efforts must start at the inception of any redevelopment plan before a zoning action is filed with the Zoning Commission. If Applicants/Petitioners who are ANCs, citizen/civic/neighborhood associations and other non-profit organizations, individual homeowners, and small developers, have questions about their community outreach and engagement efforts, they should contact the [Office of Planning](#) and/or the [Office of Zoning](#).

Community(ies)

Questions:

- What community is impacted by the zoning action?
- What specific factors define the impacted community?
 - What are some of the defining characteristics of the community (e.g., shared experience, language, etc.)?
- Who would potentially be burdened as a result of the zoning action?
- Within the community, who would potentially benefit as a result of the zoning action?

Note: Community is not intended to be limited by geographic or non-geographic factors and more than one community could be impacted or burdened by a zoning action.

Past and Present Racial Discrimination/Harm to Community

Questions:

Based on your community outreach regarding the zoning action and past land use and zoning discrimination that the community has experienced, answer the following, as applicable:

- Are there negative conditions in the community that are the result of past or present discrimination?
 - **Note:** These conditions may be implicit (e.g., lack of investment/infrastructure in neighborhoods of color) or explicit (e.g., redlining, restrictive covenants, racial segregation) effects of past or present discrimination.
- Are there current efforts or ongoing efforts in the community that are addressing past discrimination described above?
- What are the current challenges facing the community as a result of present discrimination?

Community Participation/Outreach Efforts

Questions:

- What unique factors about the affected community and/or communities influenced your outreach plan/efforts?
- How were your outreach efforts proactive in terms of meeting community needs and circumstances?
- What was the overall timeframe and frequency of your outreach?

Note: Please include evidence of outreach efforts, as applicable (e.g., meeting minutes)

Community Priorities and Impact on Zoning Action

Questions:

- Has the community identified negative outcomes that could result from the zoning action, i.e. specific things the community doesn't want to change/happen as a result of the zoning action?

- Has the community identified positive outcomes that could result from the zoning action, i.e. specific things the community wants to change as a result of the zoning action?
- Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?
 - Please include a narrative and your own analysis in the response.
- Did community outreach inform/change your zoning action? If so, how does it incorporate or respond directly to the community input received?
- If the zoning action could potentially create negative outcomes, how will they be mitigated?
- What input from the community was shared but not incorporated into the zoning action? Why?

Part Three: Disaggregated Data Regarding Race and Ethnicity

(Note: The U.S. Census Bureau definitions for race² and ethnicity³ are to be used for compilation of data)

The Zoning Commission expects disaggregated race and ethnicity data **from the Office of Planning** in every racial equity analysis submission that analyzes a zoning action through a racial equity lens. The disaggregated race and ethnicity data should be compiled from the following sources, **only**:

OP Demographic Data Hub
(opdatahub.dc.gov/)

US Census
(https://data.census.gov)

Open Data DC Platform
(opendata.dc.gov)

OP Upward Mobility Dashboard
(<https://upwardmobility.dc.gov/page/dashboard>)

As applicable to the zoning action, the disaggregated data regarding race and ethnicity should address/answer the questions below.

Disaggregated Data Regarding Race and Ethnicity

Note: The following questions and any data results are not intended to be exhaustive. Additional questions and data results may apply to a zoning action.

Questions:

- Which planning area is the zoning action located in?
- Are there relevant area metrics other than planning area that OP can utilize to compile demographic data specific to the area around the zoning action?
- Based on planning area and/or other relevant area metrics for the location of the zoning action, please answer the following:
 - What is the total population?
 - What is the racial and ethnic composition of the population?
 - What is the median income?
 - What is the median income by race?
 - What is the median age?
 - What is the median age by race?

² Race definitions:

Black or African American - A person having origins in any of the Black racial groups of Africa. It includes people who indicate their race as "Black or African American," or report entries such as African American, Kenyan, Nigerian, or Haitian.

White - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicate their race as "White" or report entries such as Irish, German, Italian, Lebanese, Arab, Moroccan, or Caucasian.

Asian - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. This includes people who reported detailed Asian responses such as: "Asian Indian," "Chinese," "Filipino," "Korean," "Japanese," "Vietnamese," and "Other Asian" or provide other detailed Asian responses.

American Indian or Alaska Native - A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment. This category includes people who indicate their race as "American Indian or Alaska Native" or report entries such as Navajo, Blackfeet, Inupiat, Yup'ik, or Central American Indian groups or South American Indian groups.

Native Hawaiian or Other Pacific Islander - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands. It includes people who reported their race as "Fijian," "Guamanian or Chamorro," "Marshallese," "Native Hawaiian," "Samoan," "Tongan," and "Other Pacific Islander" or provide other detailed Pacific Islander responses.

Two or more races - People may choose to provide two or more races either by checking two or more race response check boxes, by providing multiple responses, or by some combination of check boxes and other responses. For data product purposes, "Two or More Races" refers to combinations of two or more of the following race categories: "White," "Black or African American," American Indian or Alaska Native, "Asian," Native Hawaiian or Other Pacific Islander, "or "Some Other Race".

³ Ethnicity definitions: Hispanic or Latino; Not Hispanic or Latino

- Are there vulnerable or special populations such as seniors, children, and/or persons with disabilities that are identifiable based on the available data?
- What percentage of the population owns the real property where they live?
- What percentage of the population owns the real property where they live, by race?
- What percentage of the population rents the real property where they live?
- What percentage of the population rents the real property where they live, by race?
- Is the area on track to meet the Mayor’s 2025 affordable housing goal⁴? Please explain.
- Is there other data about the existing demographics of the area that is relevant to the proposed zoning action?
- What do available data sources show about the intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?

Part Four: Criteria to Evaluate a Zoning Action through a Racial Equity Lens

The Zoning Commission will use the data provided in racial equity analysis submissions **from the Applicant/Petitioner and the Office of Planning, described above in Parts One-Three**, as well as the themes/questions below in evaluating a zoning action’s consistency with the Comprehensive Plan through a racial equity lens.

Zoning Commission Evaluation	
What Comprehensive Plan policies related to racial equity will potentially be advanced by approval of the zoning action?	
What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?	
When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.	
Direct Displacement	Will the zoning action result in displacement of tenants or residents?
Indirect Displacement	What examples of indirect displacement might result from the zoning action?
Housing	Will the action result in changes to: ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing
Physical	Will the action result in changes to the physical environment such as: ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements
Access to Opportunity	Is there a change in access to opportunity? ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services
Community	How did community outreach and engagement inform/change the zoning action? ▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)

⁴ The Mayor’s Order 2019-036 on affordable housing sets a goal of creating 36,000 new housing units by 2025, including 12,000 affordable housing units.