

# Zoning Commission Roundtable on Racial Equity Analysis Tool

Comments from ANC 6A

# Goals and Scope

- ANC 6A fully supports and applauds the Zoning Commission and the DC government in requiring all zoning changes be viewed through a racial equity lens
- The Racial Equity Analysis Tool is a good first step in addressing racial and economic inequities in DC housing, however, it needs significant changes to be more effective
- The goal of the Racial Equity Analysis Tool should be to ensure that projects avoid promoting economic disparities and Black flight from DC in areas where that is at risk
- The Tool should also seek to reverse racial and economic flight in those areas of DC where it has already occurred
  - Identify areas of the city where racial and economic flight have already occurred and hold projects to a heightened standard, identifying how new projects reverse this impact

# Affordable Housing

- Currently, DC promotes affordable housing primarily through Inclusionary Zoning (IZ) units and direct subsidies for housing (e.g., Section 8 vouchers)
- The implementation of these programs has resulted in a system where even “affordable” housing units are outside of the means of working class families, making housing more and more unaffordable, and increasing racial and economic displacement
- The implementation of this system has also led to more DC Government funds going to land owners and landlords, who benefit from excess rent and rising land prices, which increase prices for everyone.
- ANC 6A recommends that the amount of funding provided for direct subsidies be significantly increased in order to make housing more affordable
- ANC 6A also recommends that the income levels included in the IZ program be adjusted to improve affordability. The huge income disparities evident in DC make the current program, which leverages the income mean, skewed to make units unaffordable to low-income families
  - Current MFI in DC (according to 2021 IZ Schedule) is \$129,000, and the current program only requires 50%, 60% and 80% of MFI, resulting in a program that is designed to make units affordable to a family that is earning \$64,500, well outside of the income levels of most working class families
- ANC 6A also recommends that DC develop financing tools to help developers who want to provide more affordable housing be able to finance development plans
- ANC 6A supports the Green New Deal for Housing bill (hearing scheduled in Nov 17) to create deeply affordable, green housing, and implement social housing where surplus rent or increasing land value will contribute towards more affordable units, rather than going to developers.

# Use of Objective Data

- The Racial Equity Analysis Tool as it is currently structured does not include any objective metrics or standards that should be applied
  - This approach encourages developers to cherry pick data or use subjective statements to rationalize projects through a racial equity lens
- We recommend that the ZC reformulate the Racial Equity Analysis Tool to include objective standards and metrics that developers can leverage in justifying their projects
- Follow the approach of cities such as Seattle, Portland, Los Angeles and Philadelphia, which provide a data-driven model
- The ZC should also provide objective data that developers must use to provide objective data on how their projects will support racial equity, mitigating the possibility of cherry picking data

# Direct Displacement

- DC is unusual among US cities in the degree to which gentrification results in displacement of residents ([Washington Post](#))
- Within DC, the most intense displacement is occurring in Ward 6
- We recommend that the impact of direct displacement be considered regardless of the size of new developments. Replacement of townhouses with similarly low density new construction can cause displacement
- We recommend that affordability must be considered relative to the income of long time residents in the neighborhood, rather than city wide AMI
- We recommend that the changes to the rent-control status of a property be taken into account when considering large changes to existing construction. Loss of rent-controlled housing stock as properties built primarily before 1972 are replaced with new construction has a substantial impact on displacement.

# Housing

- Analysis should show the complete details of affordable/IZ housing that is available in a project
  - Include number of units, size of units, and MFI rate
  - To give greater visibility, include actual rent that would be charged for each unit, based on current year's schedule
- Where housing is being replaced, note how much housing is available in the current building that matches the rates of the affordable units, this will ensure that there is no net loss in affordable housing

# Physical

- ❖ The Zoning Act is required to support “,,,health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, ...”
- ❖ Studies document that marginalized communities enjoy fewer/poorer quality resources, e.g. playgrounds, schools, trees, health and day care facilities, transportation options, clean air, etc.

*Parks serving primarily nonwhite populations are, on average, half the size of parks that serve majority-white populations, and ... five times more crowded. (The Trust for Public Land)*

- ❖ Each neighborhood has different needs and different priorities
- ❖ As part of a zoning change request, applicants should be required to quantify availability and quality of various community resources relative to norms, targets and/or other DC communities.
- ❖ Applicants also should elicit and document community priorities for investment
- ❖ The Zoning Commission should condition zoning changes on a requirement that developers set aside a percentage of new project budgets, or pay special rezoning fees, to be used for the community's priority resource needs, and, as appropriate, future upkeep.

# Access to Opportunity

- Racial Equity Analysis Tool should quantify jobs that are directly created by projects that will be available only to DC residents
  - This description should also include the level of these positions (e.g., entry-level, senior-level). Where positions are entry-level, what mechanisms will be available to help District residents improve their skills and knowledge
- The tool should measure how projects will provide access to jobs without prohibitive transportation costs
- Project should include metrics on the number of jobs available within defined distances, including income data
  - This data should be provided by the ZC or another DC agency



# Overall Comments

- The Racial Equity Analysis Tool needs defined metrics and objective data to achieve its goals of addressing racial and economic displacement in Washington DC
- DC needs to provide more funding, build more housing on DC land, and change its affordable housing programs to make the city more affordable for working class families
- The impact of direct displacement should be considered regardless of the size of new developments
- The Zoning Commission should condition zoning changes on a requirement that developers set aside a percentage of budgets, or pay special fees, to be used for the community's priority resource needs
- The Tool should quantify jobs that are directly created that will be available only to DC residents