

**EVEN IF SPECIAL LEGISLATION AND ORGANIZED
RELIEF INTERVENE, FREEDMEN ALWAYS START LIFE
UNDER AN ECONOMIC DISADVANTAGE WHICH
GENERATIONS, PERHAPS CENTURIES,
CANNOT OVERCOME.**

- W.E.B. Du Bois

**Achieving a racially equitable society requires policies and actions
that intentionally disrupt structural and institutional racism.**



BILL 24-0001
RACIAL EQUITY IMPACT ASSESSMENT
COMPREHENSIVE PLAN AMENDMENT
ACT OF 2020

TO: The Honorable Phil Mendelson, Chairman, Council of the District of Columbia
FROM: Dr. Brian McClure, Director, Council Office of Racial Equity
DATE: April 19, 2021

A handwritten signature in black ink, appearing to read "Brian McClure", is written over the "FROM:" line.

COMMITTEE

Committee of the Whole

BILL SUMMARY

Bill 24-0001, the “Comprehensive Plan Amendment Act of 2020,” establishes and updates a broad range of guidance, policies, and actions concerning the District’s short and long-term growth.

CONCLUSION

As introduced, Bill 24-0001 will exacerbate racial inequities in the District of Columbia.

The Committee Print, the draft amended by Chairman Mendelson’s office and under consideration by Council, makes impactful and significant changes to the Comprehensive Plan. These changes elevate racial equity as a policy priority and state that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan’s sheer size reduces the impact of the Committee Print’s positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Comprehensive Plan, as introduced, fails to address racism, an ongoing public health crisis¹ in the District. As introduced, it appears that racial equity² was neither a guiding principle in the preparation of the Comprehensive Plan, nor was it an explicit goal for the Plan’s policies, actions, implementation guidance, or evaluation. These process failures laid the groundwork for deficiencies in policy: proposals are ahistorical, solutions are not proportionate to racial inequities, and directives are concerningly weak or vague.

The Committee Print makes positive changes, perhaps the most impactful of which are to process—significantly multiplying their impact. In the Print, Small Area Plans should be conducted using a racial equity lens and the Zoning Commission must develop a process to consider all cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. However, in sum, the Plan’s size reduces the impact of the Print’s positive changes. Despite the Plan’s commitment to eliminating racial inequities, the document before us perpetuates the status quo.

This assessment intends to inform the public, Councilmembers, and Council staff about how land use decisions impact Black communities and other communities of color. While CORE’s final assessment does not represent our opinion of whether the bill should proceed, we hope it 1) fosters dialogue on the Print and 2) is used to move towards a more racially equitable *administration* of the Plan by residents, the Zoning Commission, executive agencies, and the Council. This would lay the foundation for a more racially equitable 2026 rewrite of the Plan which—both in process and in substance—must lead with racial equity.

¹ Resolution R23-0602, the [Sense of the Council to Declare Racism A Public Health Crisis in the District of Columbia Resolution of 2020](#), Effective from December 1, 2020. Published in the [DC Register](#) Volume 67, page 1406.

² For reference, see glossary of terms following the Appendix.



BACKGROUND

Structural and institutional racism led to stark racial inequities between the District’s Black and white residents. These racial inequities are among the worst in the country. In 2017, thirteen percent³ of Black residents were [unemployed](#), over four times the rate of white residents. In that same year, the median [hourly wage](#) for Black residents was \$23, while it was \$39 for white residents. Forty nine percent of white households in DC [own a home](#), while only thirty five percent of Black households and thirty percent of Latinx households are homeowners. Further, since the Comprehensive Plan last passed in 2006, at least 20,000 Black residents [have been displaced](#) from the District.

Since 2006, the [poverty](#) rate increased for Black residents. [Jobs](#) and [schools](#) remain highly segregated. Black residents [experience homelessness](#) at a rate disproportionate to the racial makeup of DC, [educational gaps](#) persist across racial and ethnic groups, and [the net worth](#) of white households in DC is eighty one times higher than that of Black households.

In 2020, COVID-19 added a public health emergency on top of the existing public health crisis of racism. These two crises exacerbated existing racial inequities and have created new ones: both COVID-19 and its impact have disproportionately devastated [Black communities](#) and [other communities of color](#).⁴ In the District, Black residents [are dying](#) of COVID-19 at a rate [disproportionate](#) to the racial makeup of DC. Nationally, Black [life expectancy](#) dropped by three years. Black owned businesses are [closing at higher rates](#) and have received less federal and [local government assistance](#). The [learning loss](#) that followed the transition to online learning in March of 2020 also disproportionately affected Black students.

It is also critical to consider [changes to the District’s population](#) over time. At its peak, Washington, DC was over seventy percent Black, leading George Clinton of The Parliament and others to refer to the nation’s capital as “Chocolate City.” In 2015, for the first time in decades, the Black majority [dropped below](#) fifty percent. The DC Policy Center and Council Office of Racial Equity (CORE)’s [DC Racial Equity Profile](#) highlights how since 2010, the District gained over 104,000 residents. Through 2017, most of this growth was in-migration of mainly young white people with advanced degrees, alongside a decline in the share of DC’s population that is Black (Figure 1).⁵ Moreover, the District remains highly racially and economically segregated, with most of the District’s Black, Latinx, and Asian and Pacific Islander residents living in Wards 1, 4, 5, 7, and 8.

It is against this backdrop that CORE reviewed the guidance, policies, and actions proposed in the Plan.

³ CORE aims to center accessibility in our writing. While this REIA’s approach towards accessibility is not exhaustive, you may find that we intentionally examine patterns such as spelling out statistics and interrogating the use of hyphenation in our writing habits.

⁴ When CORE talks about “communities of color,” we are referring to Black, Indigenous, Latinx, Asian American, Pacific Islander, and Native Hawaiian populations. We do so while acknowledging that each community of color has a unique history and experience of racism in the United States, and particularly, in the District of Columbia. While it is sometimes more efficient to reference “communities of color” in narrative text, policies and actions must respond to the [historical trauma](#) each community has faced by naming individual communities.

⁵ Between 2010 and 2017, the District’s Black population [increased by](#) 14,000 people. Native Americans’ population growth in the District declined over this period. Compared to all other racial groups, however, Black in-migration occurred at a much slower pace.

FIGURE 1

The proportion of Black residents has decreased since 2000, while most other racial groups have experienced population proportion increases.

RACE/ETHNICITY	POPULATION			PERCENTAGE POINT CHANGE FROM 2000 TO 2019
	2000	2010	2019	
WHITE	30.78%	38.48%	42.52%	↑ 12
BLACK	60.01%	50.71%	45.44%	↓ 15
HISPANIC	7.86%	9.10%	11.26%	↑ 3
ASIAN	2.13%	3.65%	4.07%	↑ 1
AMERICAN INDIAN OR ALASKAN NATIVE	0.30%	0.35%	0.27%	↓ 0
NATIVE HAWAIIAN OR PACIFIC ISLANDER	0.06%	0.05%	0.03%	↓ 0
TWO OR MORE RACES	2.35%	2.88%	3.30%	↑ 1
OTHER	3.84%	4.05%	4.37%	– 0

↑ Increase ↓ Decrease – No Change

NOTE Race categories identify percentages of the population that selected a single race, or a single race and Hispanic.

SOURCE The US Census Bureau

CREATED BY D.C. Policy Center | dcpolicycenter.org

WHAT IS THE COMPREHENSIVE PLAN?

- **The Comprehensive Plan guides the District’s long-term growth by setting policies on topics such as land use, housing, economic development, infrastructure, and the environment.**
- **The document is used by the District’s Zoning Commission—their decisions must be found to be *not inconsistent* with the Comprehensive Plan.**
- **The Plan is also used by stakeholders such as the Office of Planning, other District agencies, developers, and residents to ensure the District moves forward collectively.**
- **The latest Plan was written in 2006 and amended in 2011. The Office of Planning began its most recent public amendment process in 2016. After gathering public input, the Office of Planning transmitted its proposal to the Council in April 2020 as Bill 23-0376.**
- **In 2021, the bill was reintroduced as Bill 24-0001.**

The Comprehensive Plan guides the District’s long-term growth, shaping many aspects of residents’ lives. For example, the Plan describes how the District should balance competing demands for land, encourage retail expansion, use schools to meet nonacademic needs in their neighborhoods, and support efficient and environmentally friendly transportation choices.

This sweeping document is written every twenty years and is amended during the years between. The latest Comprehensive Plan was written in 2006 and amended in 2011. In 2016, the Office of Planning (OP) began another amendment process. The agency’s amendments—also referred to as the introduced version or

Mayor’s Proposal—were submitted to the Council of the District of Columbia in April 2020. After public hearings on the proposal in November 2020, the proposal was further amended by Chairman Mendelson. This version—the Committee Print—is the version currently before the Council in spring of 2021.

The Plan has 25 chapters (called elements) and two maps—the Future Land Use Map (FLUM) and the Generalized Policy Map (GPM). The elements are as follows:

ELEMENT	ELEMENT TYPE	DESCRIPTION
1	INTRODUCTION	This element covers the plan’s legal basis, outlines its history and role in planning, and provides an overview of its content.
2	FRAMEWORK ELEMENT	This element was introduced in 2018. Its second and final reading was in October 2019, and it passed independently of the rest of the Comprehensive Plan in February 2020. It is the plan’s foundation. It describes the forces driving change in the city, describes the District’s growth forecasts and projections, ties the Plan to the “Vision for Growing an Inclusive City,” and provides an overview of the plan, the plan’s role, and the attached maps.
3-14	CITYWIDE ELEMENTS	These elements address District-wide topics such as land use, transportation, housing, educational facilities, historic preservation, environmental protection, and economic development, among others.
15-24	AREA ELEMENTS	These elements describe the history, land use composition, demographics, housing characteristics, planning and development priorities, and policies specific to the District’s ten planning areas. For example, these include Upper Northeast, Far Northeast and Southeast, Near Northwest, and Rock Creek East, among others.
25	IMPLEMENTATION ELEMENT	This element “describes how the Comprehensive Plan’s recommended actions are to be carried out, and by which government agencies.” ⁶ This element also includes time frames indicating whether an action is ongoing or should be completed immediately, in the short-, medium-, or long-term, or is complete or obsolete.
MAP #1	FUTURE LAND USE MAP	The Future Land Use Map, often referred to as the FLUM, shows “anticipated future land uses.” These could align with current land uses or they could be different. For example, this could show an area change from a “residential-moderate density” zone to a “residential-moderate density” <i>and</i> “commercial-moderate density” zone.
MAP #2	GENERALIZED POLICY MAP	This map highlights future areas of resilience and planning analysis.

HOW DID CORE REVIEW THE COMPREHENSIVE PLAN?

This Racial Equity Impact Assessment (REIA) primarily evaluates how the Comprehensive Plan’s proposed policies and actions will improve outcomes for Black residents and other communities of color, exacerbate racial inequities, or maintain the racially inequitable status quo.

CORE customized our approach given the Comprehensive Plan’s unique qualities. The customized approach builds on [our typical practices](#), but tailors to the document’s length, number of topics covered, role in the District’s zoning decisions, and the timing of our assessment.

⁶ [Introduction Element](#), Mayor’s Comprehensive Plan Update Proposal.

CORE assessed the Committee Print in comparison to the introduced version of the bill.

Since 2006, there have been three versions of the Comprehensive Plan. The first version was passed in 2006 and slightly amended in 2011. The creation of the second version was led by the OP. The Office of Planning submitted this draft to the Council in April 2020 on behalf of Mayor Muriel Bowser’s Administration. This version was “introduced” as Bill 23-0736. Chairman Mendelson and his staff further edited this draft to create the third Comprehensive Plan update proposal, known as the Committee Print. The Committee Print was shared internally with Councilmembers and Council staff on April 14, 2021 and is the draft under consideration by the Council.

Our REIA process began with assessing the introduced version of the bill (the proposal led by the OP). We considered how the introduced version does, does not, or could advance racial equity. We provided the Chairman with a preliminary racial equity impact analysis of the

introduced version, which is summarized in detail in the Appendix of this document. We then reviewed the Committee Print in comparison to the introduced version. Both our preliminary analysis of the introduced version and our assessment of the Committee Print are included below. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Our analysis is based in historical context.

To understand the present, we must contextualize it in our past. We consult history to understand why racial inequities exist. What policies, decisions, actions, and sentiments explain how different racial groups experience life today?

Our analysis evaluates policies using the “Groundwater Approach.”

The [Groundwater Approach](#) aims to treat systems,⁷ not just problems at the individual level. The approach is grounded in three ideas: 1) that white supremacy ideology operates the same across systems; 2) socioeconomic difference does not explain racial inequity; and 3) inequities are caused by systems, regardless of people’s culture or behavior. Using the Groundwater Approach, a city in a housing crisis would not only

DATE	EVENT	VERSION
2006	The most recent full rewrite of the Comprehensive Plan is published.	1
2011	Minor amendments are made to the Comprehensive Plan.	
2016	The Office of Planning begins the Comprehensive Plan amendment process.	2
FEBRUARY 2020	The Framework Element (Chapter 2 of the Plan) is signed into law.	
APRIL 2020	The Office of Planning submits their proposed amendments to the 2006 Comprehensive Plan on behalf of Mayor Muriel Bowser’s administration. This submission is referred to as the introduced version of the bill and is numbered Bill 23-0736: Comprehensive Plan Amendment Act of 2020 .	
NOVEMBER 2020	The public testifies before Council on November 12th and 13th about the introduced version of the Plan.	
JANUARY 2021	The Plan is re-introduced in Council Period 24 as Bill 24-0001: Comprehensive Plan Amendment Act of 2020 .	
APRIL 2021	Chairman Mendelson releases the Committee Print for review by the Committee of the Whole.	3

⁷ These systems include structural and institutional racism. [Structural racism](#) is a system in which public policies, institutional practices, cultural representations, and other norms work in various, often reinforcing ways to perpetuate racial group inequity. It identifies dimensions of our history and culture that have allowed privileges associated with “whiteness” and disadvantages associated with “color” to endure and adapt over time. [Institutional racism](#) refers to policies, practices, and procedures that work better for white people than for people of color, often unintentionally.

provide temporary shelter to individuals experiencing homelessness. Rather, the city would *also* seek to understand and address the underlying—or groundwater—issues that sustain and cause homelessness.

Our analysis evaluates policies through a racial equity lens.

In addition to considering how history led to present conditions, we analyze proposed policies through a racial equity lens, which can be thought of as a prism. Looking through different sides of this prism could mean asking one, several, or all the following questions:

RACIAL EQUITY ANGLE	POSSIBLE QUESTIONS
EXPERIENCES OF EACH RACIAL AND ETHNIC POPULATION	How does each racial and ethnic group currently fare given the outcome this policy aims to improve? Which racial and ethnic groups would be most affected by this policy? Does the policy address these differences? If so, does the policy consider each community differently or are groups incorrectly lumped together? How proportionate is the policy to the inequities faced by each racial and ethnic group?
HISTORICAL LEGACIES OF RACISM AND RACIAL TRAUMA	Why do different racial and ethnic groups fare differently when we examine the outcome of interest? Which of these historical legacies continue to be implicated today, either via the policy at hand or in how the policy might be perceived?
RACIALLY EQUITABLE REPRESENTATION AND ENGAGEMENT	Who does the current feedback system favor? Who was “at the table” when decisions were made and who was at the table but did not have institutionally or socially recognized power to influence decisions? Who wasn’t but should have been? Who could have feasibly been there? Who was proactively invited? Whose lived experience was centered? Whose lived experiences are ignored? What advantages and disadvantages do different parties have when they are “at the table” and how do those parties look from a racial and ethnic perspective?
ASSESS DIFFERENT FORMS OF DISCRIMINATION	What do the eligibility and application processes for services and programs look like? In what ways are they inclusionary, in what ways are they exclusionary, and to whom? How are these processes being monitored for bias?
DIFFERENCES IN OUTPUTS⁸ FOR RACIAL AND ETHNIC GROUPS	What are the outputs of interest (or progress indicators) for this policy? What could the outputs be for each affected racial and ethnic population? Might the outputs be different across groups? Why? Does the policy indicate that outputs will be monitored and addressed?
DISPARATE RACIAL AND ETHNIC OUTCOMES	What could be the impact of this program or policy on each affected racial and ethnic population? Might the impacts be different across groups? Why? Is there an indication that outcomes will be monitored and addressed?

Framework adapted from [The State of Equity Measurement](#) (The Urban Institute) and [Using a Racial Equity Scorecard for Policy and Programs](#) (Bread for the World Institute).

If we determined that a policy exacerbates racial inequity (or has the potential to), we explain why. We then provided direction on how to revisit or analyze the policy with a racial equity lens.

⁸ An “output” is an easily measurable indicator related to a program or policy’s activities. An “outcome” is the true goal of the program or policy. For example, a student attendance program would measure the number of days a student is in school as an *output* to better understand how the program is affecting the *outcome* of better school performance. Policymakers and implementers must keep an eye on both.

Our analysis focused on the Plan’s most critical elements.

Every element in the Comprehensive Plan has the potential to impact Black residents and other residents of color. However, we focused on elements that 1) could have the most *profound* impact on Black residents and other residents of color and 2) were the most influential given the Comprehensive Plan’s role in zoning. These guidelines led the CORE team to conduct an in-depth, line-by-line analysis of the following elements (chapter numbers in parentheses):

- Land Use (3)
- Transportation (4)
- Housing (5)
- Environmental Protection (6)
- Economic Development (7)
- Parks, Recreation, and Open Space (8)
- Educational Facilities (12)
- Infrastructure (13)
- Implementation (25)

SUMMARY OF RACIAL EQUITY IMPACT THEMES

Several recurring themes prevent the Comprehensive Plan (as introduced) from advancing racial equity. We hope that these themes can be used as a resource by Councilmembers, the public, and the executive in applying a racial equity lens to review the Committee Print. The eight themes are listed below and are elaborated on over the following pages.⁹

P O L I C Y	1	As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.
	2	As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.
	3	As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.
	4	Vague and ambiguous language leaves room for interpretation that may widen racial inequities, harming the District’s Black residents and other residents of color.
P R O C E S S	5	As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.
	6	As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.
	7	As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.
	8	As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.

⁹ Please keep in mind the examples below are based on the introduced version and illustrate how we arrived at the stated themes. In many instances, these examples have been modified in the Committee Print.

HISTORICAL AND COMPREHENSIVE CONTEXT

ISSUE

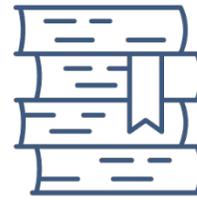
As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.



The Plan oversimplifies, glosses over, omits, and disguises defining moments in history. The continued displacement of and discrimination against Black residents and [other communities of color](#) is largely ignored. Policies stemming from this inaccurate context will not—and cannot—address racial inequity.

BEST PRACTICE

Achieving racial equity requires acknowledging and accounting for historical trauma. In addition, to address racial inequities, we must acknowledge the full context of our present.



The past explains why Black communities and other communities of color experience widened racial divides to this very day. Recount history fully—especially when the truth is tough—and take a comprehensive look at our present when beginning the policymaking process.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 512.2

As introduced, this section reads, “in the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.” The section mentions redlining—which is critical when discussing housing policy—but then [omits that home loan funds](#) were withheld from Black residents and people of other ethnicities. Ignoring the past will not erase [its audacities](#); this policy [impacts Black residents to this day](#).

ADDITIONAL EXAMPLE | PARKS, RECREATION, AND OPEN SPACE ELEMENT

There is a lack of consideration for the unhoused population who utilize parks and open spaces in the District. The Parks, Recreation, and Open Space Element fails to mention the [unhoused population](#), many of whom encamp in District parks. In fact, eighty six percent of the [unhoused population in the District](#) are Black, although only forty seven percent of the District’s population is Black. Still, the element does not account for their experiences or needs.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

Section 312.1 of the Land Use Element ignores how [discriminatory government sanctioned practices](#) led to DC being one of the most segregated cities in the nation. The section only notes that, “many of Washington, DC’s neighborhoods were developed before 1920 when its first zoning regulations were applied.” This overlooks how prior to the 1920s, wealthy property owners and developers used [racially restrictive covenants](#) and the courts to wield tremendous influence in designing the District. This often unchecked

power was reinforced by court rulings such as [Costin v. Washington](#) and paved the way for [restrictive covenants post-1920](#) to become commonplace.¹⁰

HOW THE COMMITTEE PRINT ADDRESSES HISTORICAL AND COMPREHENSIVE CONTEXT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s efforts to include a more historically informed and comprehensive narrative in the Comprehensive Plan.

Initially, the introduced version was ahistorical, neglecting to mention or fully discuss critical moments and patterns that shaped the District. The Committee Print now discusses the role of highways in displacing Black communities (Section 400.11), the discrimination inherent in the creation of Metrorail (400.11), and the District’s role in reducing affordable housing options (510.3). In addition, the investment in the area around the Columbia Heights Metro station was portrayed as a pure “success story” without mentioning the displacement of Black and Latinx residents, but the Committee Print now adds this missing context (506.3).

The Committee Print also added a new action to the Land Use Element (Action LU-2.1.C) requiring additional study, public engagement, consideration of the District’s history of systemic racism and distinct land use and housing patterns. The purpose of this study is to help provide policymakers with a better understanding of how policies have created inequities, best practices to address land use inequities, and encourage more equitable development objectives.

The introduced version was also selective in the context it provided about the present. Now, the Committee Print’s Economic Development Element addresses income and wealth gaps (700.6*¹¹, 703.2).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹⁰ *Costin v. Washington* (Case No. 3,266) – Oct. Term, 1821 – [The Federal Cases: Comprising Cases Argued and Determined in the Circuit and District Courts of the United States](#), accessed April 2021.

¹¹ If a section number is marked with an asterisk, it denotes a new section that was added in the Committee Print. Please note that as the Print was drafted, section numbers may have shifted.

RACE NEUTRAL POLICIES

ISSUE

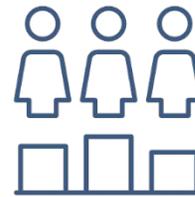
As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.



Passing race neutral policies today perpetuates the past. Simply, if racist policies have led to white communities having “more” and communities of color having “less,” treating everyone the same today will not change that inequity. Unfortunately, the introduced Plan does just that: its proposed solutions are not in proportion to racial inequities and focus on equality and inclusivity.

BEST PRACTICE

Tailor policies to address racial inequities by [acknowledging](#) how Black communities and other communities of color have their own distinct history, experiences, and relationship to white supremacy.



When designing policies, consider how different racial groups may be affected based on their history and current experiences. Write policies with [community- and circumstance-specific](#) solutions that treat communities equitably rather than equally (by providing everyone the same solution). Ensure that relevant outputs and outcomes are monitored for disparate impacts.

ILLUSTRATIVE EXAMPLE | ECONOMIC DEVELOPMENT ELEMENT | SECTION 703.15

This policy cites the District’s goal to “support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance” and a range of other tools. This policy would provide the same level of support to *all* local entrepreneurs—despite the fact that Black owned businesses [make up less](#) than fourteen percent of total businesses in the District, while Black residents make up forty five percent of the population. (In contrast, seventy one percent of businesses are white owned, and about fifteen percent of businesses are owned by Asian or Pacific Islanders.) This policy also ignores that between 2016-2018, less than twenty six percent of [contracts awarded](#) in the District went to minority owned businesses. It also ignores that since COVID-19, forty one percent of [Black owned businesses have closed](#) compared to seventeen percent of white owned businesses (due to the pandemic).

ADDITIONAL EXAMPLE | TRANSPORTATION ELEMENT | SECTION 415.7

Section 415.7 considers the use of roadway pricing, where drivers would be “charged via electronically read debit cards for entering the central portion of the District.” Congestion pricing is likely to have a disparate income on Black residents without explicit recognition and reflection of the [income differences](#) between racial groups in the District. This policy consideration is even more troubling given how many Black residents commute [via car](#) because they have been pushed to the outer edges—and outside of—the District due to rising housing costs.

In addition, this section assumes that all drivers have debit cards. As noted in [the Council’s Committee Report for Bill 23-122](#), “one percent of white households are unbanked, in contrast to twenty one percent of

Black households. Another thirty six percent of Black households are underbanked,” illustrating the consequences and shortcomings of a race neutral lens.

HOW THE COMMITTEE PRINT ADDRESSES RACE NEUTRAL POLICIES

Based on a sampling of sections—although the Committee Print takes steps in the right direction—CORE remains discouraged by the Committee Print’s race neutral approach. We are strongly encouraged by the Committee Print’s Economic Development Element. However, in other elements such as Housing, Land Use, and Transportation, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan.

Initially, the Economic Development Element largely ignored structural inequity, the racial wealth gap, and any centering of businesses owned by Black residents and other residents of color. Now, the Committee Print addresses what a racially equitable economy looks like (Section 700.6*) and contemplates policies and actions that center the experiences of the Black community and other communities of color.

The Print includes policies that actively advance racial equity. New language calls on the District to advance racially equitable economic development by “disrupting systems that perpetuate income and wealth inequality.” Section 703.20 (Action ED-1.1.A) now requires the Economic Development Strategic Plan to “identify approaches that provide recruitment and opportunities to participate by small and minority-owned businesses, and approaches to close the racial income and wealth gaps in the District.”

In addition, Section 703.15 (Policy ED-1.1.4) initially talked about providing support for *all* District residents seeking entrepreneurship opportunities. This section omitted the fact that Black owned businesses in the District are [struggling](#), [closing](#), and receiving [technical assistance](#) at inequitable rates. The Committee Print addresses this concern by adding language to provide support to [equity impact enterprises](#) (small, local businesses that are likely to be owned by Black residents or other residents of color).

However, in other elements, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan. For example, Land Use Section 307.15 (Policy LU-1.4.6) deals with parking near Metro stations. Below, we analyze an instance where the Committee Print takes strides, but more steps could be taken to truly address racial inequity.

	INTRODUCED VERSION	COMMITTEE PRINT (change in bold)
PLAN TEXT	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters, while considering the commuting characteristics of District residents, such as access to transit stations and mode use, to provide equitable outcomes. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.
ANALYSIS	This section unilaterally discourages parking and deprioritizes the needs of all-day commuters without considering why some commuters may be driving. “There is a deep racial divide in commuting modes ,” according to the DC Policy Center. 47 percent of Black or African American residents drove to work in 2015, compared to about 28 percent of white residents. This is because of proximity to transit and employment of opportunities, which are deeply intertwined with race.	The Committee Print takes a step toward acknowledging commuting differences, but the core policy remains unchanged in the Print. The referenced study specifically speaks to racial disparities in driving to work, but it is important to be mindful of racial inequities in commuting modes and we must consider the specific needs of all-day commuters. If this policy took a groundwater approach, it would ask, “what is the racial makeup of all-day commuters parking at Metro stations? What does the data tell us about who they are? What would the outcome be if the needs of all-day commuters were deprioritized?”

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE STRENGTH

ISSUE

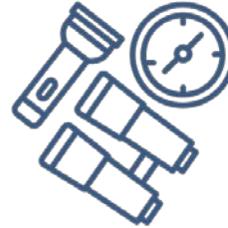
As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.



Bill 24-0001 significantly weakens the language of the 2006/2011 Plan. The introduced version often expresses the District’s aspirations rather than its commitment and obligation to policies or actions.

BEST PRACTICE

Policies that are straightforward, enforceable, and account for racial inequities advance racial equity.



Binding language is clear to follow. It leaves little room for interpretation, improving the likelihood that policies are executed as intended. Strong directives also hold the government accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 511.7

Previously this policy read, “ensure compliance with the Community Investment Act of 1977, which prohibits the practice of redlining local neighborhoods.” As part of the 2020 amendments, the section was updated to say that “redlining...*should be prohibited*.” Given the racist history and [enduring legacy](#) of redlining practices, full compliance with fair housing laws must be fully enforced and complied with.

ADDITIONAL EXAMPLE | HOUSING ELEMENT | SECTION 510.16

In the introduced version of the Comprehensive Plan, Section 511.7 read, “tenants *should* be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.” Previously, the section *required* that tenants were provided information about their rights. The introduced version weakened this push for tenant rights, reverting from a requirement to an ideal.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE STRENGTH

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s return to the strong, strict, and clear language of the 2006/2011 Comprehensive Plan. In the Housing Element, for example, Sections 510.1, 506.11, 511.7, and 514.8 state the District’s intent clearly and strongly.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE CLARITY

ISSUE

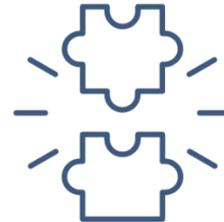
Vague and ambiguous language leaves room for interpretation that may widen inequities, harming the District’s Black residents and other residents of color.



Vague language like “greatest extent feasible” and “substantial share” lacks accountability. Similarly, ambiguous language like “neighborhood character,” “high need,” and “equitable” are used without contextual definitions.

BEST PRACTICE

Use clear and specific language to ensure all parties understand expectations and can be held accountable. Name specific racial and ethnic groups where possible and relevant.



Straightforward writing improves the likelihood that the policy will drive change instead of only offering platitudes. With clear policies, implementing agencies can also be held accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 510.12

This policy notes that “as affordable housing reaches the end of its functional life, [the District must] support the redevelopment of the site to the greatest extent feasible in line with the District’s goals and strategies regarding equity and inclusion.” Affordable housing is a limited but critical resource in the District, and this section is concerningly vague about what would happen when such housing becomes less viable. First, it is unclear what type of “affordable housing” is being referenced, which is important given how different funding sources (and potentially other factors) define “functional life.” (While the Committee Print does define how it uses the phrase “affordable housing,” the definition is limited to the tenants’ income threshold, not the funding source.) Second, it is unclear which “goals and strategies regarding equity and inclusion” apply and racial equity is not specifically mentioned. Third, it is unclear how the Zoning Commission will measure feasibility—financial, or something else? This phrasing leaves the future of affordable housing—and more important, the future of residents who reside there—at the discretion of the Zoning Commission’s interpretation.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

CORE strongly encourages the interrogation of the words we use, why we use those words, and what historical meanings are attached to words, even if they are terms of art. For example, the Land Use Element uses [amorphous](#) terms such as “preserve neighborhood character” and “established neighborhoods.” These terms are inherently biased and racially coded, and therefore should be defined to ensure clarity in how and why they are used. [Historically](#), such terms have been used to exclude Black residents in order to [maintain “exclusively” white](#) communities. Further, as drafted, the Comp Plan refers to more affluent, gentrifying communities as “established” and refers to predominantly Black or low-income communities as “emerging” or “underserved.” Such language stems from [racist language](#) that sent veiled signals to white residents about which communities were safe to rent or buy in.

Even if these terms technically do not have the same intent today, it is important to be mindful of the terms we use to characterize different communities.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE CLARITY

Based on a sampling of sections, CORE is unconvinced that the Committee Print’s changes respond to a call for language clarity.

For example, Section 506.9 (Policy H-1.4.4) called for public housing renovations to “minimize displacement and resident moves” in the introduced version. The Committee Print changes this to read, “*to the greatest extent possible, minimize temporary displacement and resident moves.*” It is unclear who is tasked with implementing this aspirational language. In addition, if the District’s goal is to end racial inequities, CORE believes the District should set guidance to prevent and eliminate displacement, rather than minimize it.

More broadly, the language used to define communities and racial equity is inconsistent throughout the Committee Print. This largely stems from the introduced version’s language choice—but nevertheless, the Committee Print falls short of correcting this problem throughout the Plan. “Communities of color” is often used instead of explicitly naming racial groups (Sections 403.13, 628.5), and “communities of color” is often used alongside “low-income communities,” blurring the hardships caused by racism and those caused purely by income (304.7, 400.11*, 500.31). In addition, we encourage readers to be mindful that we do not use “low-income” or other phrases as substitutes to mean Black.

Further, a commitment to “equity” is sometimes the focus of the Committee Print versus “racial equity” (400.3, 504.16). Where possible, the Plan should be clear when it is speaking about equity, when it is speaking about racial equity, and why. The Comprehensive Plan’s fundamental concern is land use—it should be the Comprehensive Plan’s fundamental goal to address the lasting impacts of racial discrimination in the District’s land use.

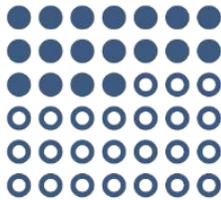
Finally, the Committee Print continues using “neighborhood character” and “historic character” despite their racist roots. The Committee Report discusses the Committee of the Whole’s evaluation of the issue, though the language remains in the Committee Print.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

DISAGGREGATED DATA

ISSUE

As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.



When aggregate statistics are used in policymaking, they tell an incomplete story and lay a mistaken foundation of the issue at hand. Put another way, aggregate statistics typically conceal the inequities experienced by Black communities and communities of color.

BEST PRACTICE

Disaggregating data by race exposes inequities, providing information necessary to deconstruct structural racism.



[Disaggregating data](#) by race highlights experiences faced by Black communities and other communities of color. Understanding these [differences](#) is critical to designing policies proportionate to racial inequities.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 513.1

This section reports the District’s homeownership rate as forty two percent for all residents (an *aggregate* statistic). [Disaggregated statistics](#) show that the homeownership rate is forty nine percent for white residents, thirty five percent for Black residents, thirty percent for Latinx residents, and thirty five percent for all residents of color. Ignoring racial disparities may lead to policies that increase the District’s overall homeownership rate, while ignoring (and perhaps exacerbating) the homeownership gap between white residents and residents of color.

ADDITIONAL EXAMPLE | LAND USE ELEMENT | SECTION 304.1

This narrative section notes that “since...2006, the District’s population has grown almost twenty percent and is anticipated to reach 987,200 residents after 2045. The continued interest in living and working in the District requires a shift in planning efforts to support such growth and the challenges it brings.” The twenty percent increase in population is net growth—and doesn’t account for who has left the District and why. From 2000 to 2013, [20,000 Black residents](#) were displaced from the District of Columbia. DC was one of seven cities in the country that accounted for nearly half of the nation’s gentrification. Reporting aggregate data obscures these critical facts.

HOW THE COMMITTEE PRINT ADDRESSES DISAGGREGATED DATA

Based on a sampling of sections, CORE is encouraged by the Committee Print’s use of and call for the **disaggregation of data**. Section 513.1 and 513.2 now discuss the inequities in home ownership rates between racial groups. Section 415.8* notes the importance of “disaggregated data that identifies the mode use, ability, and access for communities of color” to inform “appropriate, equitable [Transit Demand Management] measures [and] minimize barriers to entry.”

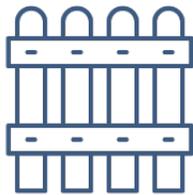
However, there is room for improvement. In several elements, disaggregated data is mentioned in the beginning of a chapter, but not throughout the chapter. The Plan could pull in publicly available data disaggregated by race and ethnicity in additional instances. Ideally, the introduced version of the Plan should have made this effort throughout the amendment process given the length of the document.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMUNITY INPUT

ISSUE

As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.



Increasing community participation can support racially equitable processes by distributing the power of decision making and elevating the voices of those not “in the room.” Community involvement is critical in planning decisions, where impacts are far reaching and long term.

BEST PRACTICE

Follow [the Framework Element](#), which calls for “those most impacted by structural racism” to be proactively and “meaningfully involved” in the planning process. Create accessible processes that are accountable to community-driven priorities.



Racially equitable planning begins with listening to, recognizing the power of, and building with the community. The District needs [new strategies](#) and [innovative methods](#) to *proactively* elevate and authentically listen to voices that have historically been excluded from planning, implementation, and evaluation processes.

ILLUSTRATIVE EXAMPLE | FUTURE LAND USE MAP + LAND USE ELEMENT

As introduced, the Comprehensive Plan does not build on the goals laid out in the [Framework Element](#) (213.6) to build capacity of the most marginalized communities to “fully and substantively participate in decision-making processes.” As introduced, the Comprehensive Plan fails to: 1) clarify how existing land use and zoning processes work and intersect with the Future Land Use Map (FLUM); 2) envision new strategies to accomplish the Framework’s goal to encourage a more inclusive community input process; and 3) maintains an existing community input process that is both exclusionary and inaccessible.

Existing [law requires](#) continuous community input in every phase of the Comprehensive Plan’s development, from conception to adoption to implementation.¹² However, the current community input process for development decisions is often technical and unclear. This advantages privileged stakeholders who have the time and resources to understand and participate in [development reviews](#), [design reviews](#), and the [map amendment process](#).

There are [many tools](#) that can be employed to [disrupt the status quo](#) and encourage new ways for community input. CORE strongly encourages employing these methods [to map how a resident](#) would learn the various community input processes and use a structured approach to [reduce complexity](#) in understanding the processes—and within the processes themselves.

¹² Existing law calls for a variety of means to secure community input throughout each stage of development, which may include developing of Small Area Plans or testifying on text amendments, for example. This may include advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication.

ADDITIONAL EXAMPLE | PRESERVING + ENSURING COMMUNITY INPUT | DC CODE 1-306.04

DC Law requires a variety of means to secure community input.¹³ One way community input is weaved into the Implementation Element is through a required periodic review of progress reports. Although these progress reports are required at least once every four years, CORE has only found two since 2000: one published in [2010](#) and the other in [2012](#).

Further, the Mayor is required to “submit to the Council a report, accompanied by a proposed resolution, on the progress made by the government of the District of Columbia in implementing the District elements of the Comprehensive Plan.” OP maintains a [website](#) showing the progress of provisions, but this still does not meet the requirements spelled out by law. The Council has also not held or scheduled public hearings on those progress reports. Additionally, Council has not submitted its findings nor a copy of public testimony to the Mayor, both of which are required by law following each review period.

These provisions of the law were created to give the community a chance to weigh in on how actions in the existing Plan impact them. These reports and hearings would have also provided an opportunity for the public to see and give feedback on key projected implementation activities that will occur following the completion of the review period.

HOW THE COMMITTEE PRINT ADDRESSES COMMUNITY INPUT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s steps to clarify and strengthen community involvement. The Implementation Element now requires Small Area Plans and other planning studies be conducted using a racial equity lens (Section 2503.2). The element also requires that these and all other planning documents be evaluated using a racial equity impact analysis.

The Committee Print also adds a new policy that promotes full, transparent, and equitable participation that enables low income households, communities of color, older adults, and individuals with disabilities to participate fully and equitably. Second, it acknowledges the need to remove existing barriers which prevent equitable community participation. Some barriers include inequitable access to information and technology, availability of time, and resource constraints such as transportation.

The Committee Print takes important steps by requiring that District-led planning activities shall provide meaningful, accessible, and equitable opportunities for public participation early and throughout all planning activities. Additional language in the Print takes important steps to help residents gain clarity into navigating the various maps and review processes. New language in the Print calls for both the Future Land Use Map and the Generalized Policy Map to be evaluated for effectiveness in achieving District goals, appropriateness of categories, clarity, and ease of use. CORE is encouraged by these additions and strongly encourages racially equitable participation to help lead and shape how these goals are set and evaluated.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹³ This may include advisory and technical committees, community workshops, public forums, or other means of discussion to name a few.

INTERNAL PLANNING

ISSUE

As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.



While the Comp Plan is designed to set policies and provide guidance on land use decisions, it does not equip District Government staff and the Zoning Commission with the training, resources, and support needed to implement the Plan in a racially equitable way.

BEST PRACTICE

Proactively train staff on how to develop and use a racial equity lens in city planning. Ensure the diversity of the District is represented and reflected in all decision-making processes.



Use a variety of strategies, like [a racial equity toolkit](#), to ensure planning processes, land use decisions, and investment decisions are designed to close racial inequities. [Ensure](#) that communities and experts of color with lived and/or scholarly expertise participate *and* lead (or co-lead) decision making processes.

ILLUSTRATIVE EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2501.3

According to OP, the purpose of the [Equity Crosswalk](#) is to help the District to prioritize and target public investments, policies, and programs, particularly for those who have been most marginalized by systemic racism and structural inequity. However, it is unclear how the Equity Crosswalk will be used (and by whom) once the Comp Plan is passed into law. Nothing in the Crosswalk prepares agencies and agency staff to apply a racial equity lens to ensure programs, regulations, and operating procedures are implemented in a racially equitable way. In addition, of the ninety seven actions in the Crosswalk, the words “race” or “racial equity” are only mentioned three times. While the concept of the Equity Crosswalk is laudable, the policies and actions it contains do not focus on eliminating racial inequities.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.1

This section requires agency review of development proposals for impacts on public services and the natural environment. However, this section does not call for the Historic Preservation Review Board or other District staff to develop or be trained in racial equity assessment tools. Such tools are designed to measure and assess projects for their impacts on Black communities and other communities of color.

HOW THE COMMITTEE PRINT ADDRESSES INTERNAL PLANNING

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s updates. This includes updated language requiring District agencies to evaluate and implement the Plan’s policies through a racial equity lens (Section 2501.2). The Print also includes a separate new action item (Action IM-1.1.C) focused on providing ongoing racial equity training for development review decision-makers and

related staff. This includes staff and Zoning Commissioners, the Board of Zoning Adjustment, and the Historic Preservation Review Board.

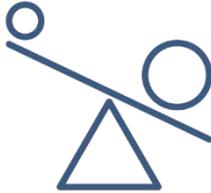
The Print also improves the Capital Improvement Planning (CIP) process by requiring the CIP to evaluate how major capital projects contribute to the goal of racially equitable development across the District (2509.3, 2509.5).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

EVALUATION THROUGH A RACIAL EQUITY LENS

ISSUE

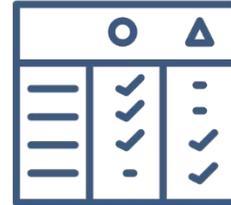
As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.



The Comp Plan requires studies, evaluations, development reviews, environmental assessments, and progress reports—but a racial equity lens is not explicitly required. A racial equity lens would center the needs, leadership, and expertise of Black residents and other residents of color, paving the way for the elimination of racial inequities.

BEST PRACTICE

Disparate impact analyses and racial equity-focused evaluations must inform planning decisions.



Frequent racial equity-focused [evaluations](#) establish critical baseline data, support the development of goals based on that data, and normalize continuous monitoring of racial equity goals. Ideally, frequent evaluations would also inform course correcting actions between evaluations.

ILLUSTRATIVE EXAMPLE | LAND USE ELEMENT | SECTION 316.1

This section requires the District “to develop criteria for evaluating rezoning requests.” However, an evaluation methodology from a racial equity perspective is not offered in this section or in any other part of the Plan. As written, how rezoning requests may adversely or positively impact communities of color would be unknown and subject to chance.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.5

This section states, “to the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods...are assessed and adequately mitigated.” However, this section does not define what positive impacts are, how they can be maximized, and for whom these impacts are to be achieved for. Moreover, it also does not define or articulate what negative impacts are.

This is an opportunity to reinforce the District’s commitment to improving outcomes and eliminating racial inequities, specifically for communities of color. Further, the development review process and decisions coming from that process can and should establish a framework that applies a racial equity lens.

HOW THE COMMITTEE PRINT ADDRESSES EVALUATION THROUGH A RACIAL EQUITY LENS

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s incorporation of racial equity evaluations. In the Housing Element, racial equity evaluations are now embedded in a review of federal and local housing programs (Section 504.27) and the allocation of housing improvement funds

will consider historic barriers and existing racial gaps in housing access and opportunity (506.8). In the Economic Development Element, stricter monitoring of Opportunity Zones is now required (703.26).

The Implementation Element includes the most significant improvements, including perhaps the most consequential improvement to the Committee Print. A new action (2501.7*) requires that the Zoning Commission develop a process of evaluating all cases through a racial equity lens. In addition, racial equity tools are now required in the preparation of plans, zoning code updates, and the Capital Improvement Program (2509.3). Importantly, related racial equity training for staff is also required (2502.1).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMITTEE PRINT CONCLUSION

The Committee Print makes impactful and significant changes to the Comprehensive Plan, elevating racial equity as a policy priority and stating that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan's sheer size reduces the impact of the Committee Print's positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Zoning Commission must now develop a process to consider *all* cases through a racial equity lens.

Perhaps the Committee Print's most important changes appear in the Implementation Element. Now, Small Area Plans should be conducted using a racial equity lens and consider the use of a racial equity impact analysis (or similar tool). In addition, the Zoning Commission must now develop a process to consider *all* cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. These process changes will influence many plans and decisions into the future, significantly multiplying their impact.

The Committee Print also makes encouraging changes to the introduced version's policies. The Print now reports disaggregated data, requires studies through a racial equity lens, and sets new goals to encourage equitable public participation. The Print infuses a focus on eliminating racial inequities in many elements, not just in the Framework. Throughout the elements, softer language was reverted to stronger directives to protect residents and hold implementing agencies accountable. A more honest historical context and depiction of the present is recognized in several areas. And in the Economic Development Element, equity impact enterprises are now highlighted.

While the Committee Print takes key steps in some areas to improve the introduced version, these changes do not appear in all relevant instances and throughout all elements. Language remains in need of clarification, racial inequities are hidden where the Plan uses aggregate data, and historical context and racial trauma are inconsistently recognized. These issues lead to inconsistently informed and race neutral policies. These policies, therefore, are often racially inequitable.

After analyzing legislation, CORE weighs its conclusions to determine [the impact of a bill](#). This methodology, however, is difficult to apply to the Comprehensive Plan. We had to consider how much weight to give to policies, to actions, and to general guidance, all of which can vary in size and scope. This makes it hard to determine any given section's possible impact. An assessment is never a simple comparison of the number of "racially equitable" policies to the number of "racially inequitable" ones, but the Comprehensive Plan's length, breadth, and role made it even more of an undertaking. Given the scope of the Comprehensive Plan, CORE adapted our assessment to account for some of these complexities.

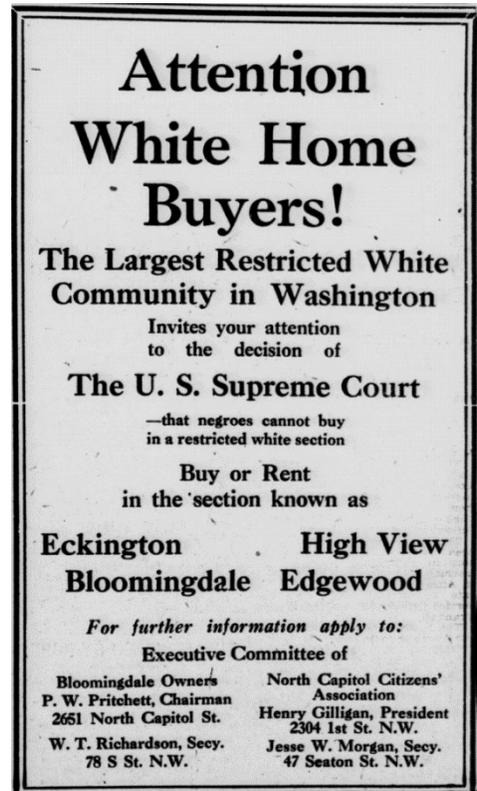
Despite the Plan's commitment to eliminating racial inequities, the document before us still perpetuates the status quo. Although the Plan primarily sets guidance, land use decisions impact every aspect of residents' social and economic wellbeing. These decisions influence housing prices, housing choice, rent burden, education, a resident's access to transit, proximity to necessities, amenities, commute time, and healthcare options.

While CORE's final assessment does not represent our opinion of whether the bill should proceed, we do hope that members, staff, and the public use it to inform debate, to improve upon the strides made by the Committee Print, and once passed, as a foundation to build upon during implementation. Specifically, this REIA aims to provide guidance on how land use decisions impact Black communities and other communities of color. It also intends to foster greater dialogue, particularly on issues related to race. We especially hope that it sparks conversation leading into the development of Small Area Plans, other long-term planning decisions, and into the 2026 rewrite.

RECOMMENDATIONS

The Comprehensive Plan document is only the guide to the District's growth. The actual growth will be determined by how residents, the Zoning Commission, Office of Planning, other executive agencies, and the Council choose to implement the Plan. Our hope is that this REIA is used as a framework to move towards a more racially equitable *administration* of the Comprehensive Plan. These implementation changes would also lay a foundation for a more racially equitable 2026 Plan (in both its drafting process and policies):

- On both the Executive and Council side, review the Comprehensive Plan law and **ensure future compliance**.
- **Restructure processes to empower communities of color with real planning and development decision-making authority.** New York, for example, uses [participatory planning and budgeting](#) to allow residents opportunities to not just participate in planning, but to have real authority to make decisions by sharing ideas, developing proposals, and voting on community projects. A similar concept can be applied locally to planning processes.
- **For the next Comp Plan rewrite, and to comply with existing law,** each Council committee should consider **holding both public hearings and community roundtables on the relevant element(s) under that Committee's purview.** This should include holding nontraditional hearings that accommodate the schedule and location needs of those with the least flexibility. This may also mean the facilitation of more informal community driven conversations such as Ramsey County's [Equity Action Circle](#), which was created to ensure the voice of the community is driving decision-making processes.
- **Review which administrative data** is collected on planning matters and how it can be used to understand how planning decisions are reducing or exacerbating racial inequities.
- Set up systems to collect and **track disaggregated data** by race and ethnicity on planning matters. Regularly evaluate disaggregated data to determine if and how decisions and policies affect outcomes for Black communities and other communities of color.
- **Establish definitive goals** to eliminate known racial inequities. These goals should be established through a racially equitable process.
- Require **specialized racial equity training** for all staff involved in planning decisions (including boards and commissions). Such training will equip staff to craft solutions proportionate to the racial historical trauma that Black communities and other communities of color in the District have faced. This training should be specific to planning in the District and include a review of the District's history (like the ad above). Lastly, this training should help staff understand how to apply a racial equity lens to the Plan's guidance, policies, programs to eliminate current racial inequities.



A 1926 ad published after racial covenants were deemed legal by the U.S. Supreme Court. ([source](#))

CAVEATS/CONSIDERATIONS

Alongside the analysis provided above, the Council Office of Racial Equity encourages readers to keep the following caveats and considerations in mind:

CORE acknowledges the Office of Planning's [efforts](#) to amend the Comprehensive Plan via community meetings, office hours, and online feedback.

Community engagement is critical to racially equitable policies and decision making. It is especially critical in planning decisions, where the impacts are far reaching and long lasting. To this end, OP held 100 community based office hours across all wards, reviewed 3,000 amendment proposals, and engaged ANCs.

In many ways, OP's planning efforts have deepened and refined the general guidance offered in the Plan. These efforts focused in on place-based planning and produced twenty-nine SAPs, strategic and long-term plans, and other planning documents such as *MoveDC*, *SustainableDC*, and *Climate Ready DC*. These growth strategies include a greater focus on affordable housing, the inclusion of resilience, and a focus on equity (although not racial equity). Collectively, these strategies are likely to accommodate growth and can generate positive outcomes for *many* residents.

However, these efforts, while commendable, do not replace the need for innovative, consistent participatory approaches that substantively and proactively includes Black communities and other communities of color early on in both planning and decision making processes.

Assessing legislation's potential racial equity impacts is a rigorous, challenging, analytical, and uncertain undertaking.

Assessing policy for racial equity is a rigorous and organized exercise but also one with constraints. It's impossible for anyone to predict the future, implementation does not always match the intent of the law, critical data may be unavailable, and today's circumstances may change tomorrow. In such a long document, there are also many policies, competing priorities, and diverse implementers. Our assessment is our most educated and critical hypothesis.

This assessment intends to inform the public, Councilmembers, and Council staff about the Comprehensive Plan through a racial equity lens.

As a reminder, a REIA is not binding. Regardless of CORE's final assessment, the legislation can still pass.

This assessment aims to be accurate and useful. It provides a representative look at the Plan but does not include a review of every element.

Given the complexity of racial equity issues, the length of the legislation, and CORE's decision to focus on the most critical elements, we have not raised *all* relevant racial equity issues present in the plan. Our hope is that by organizing this assessment into themes, we can better convey how to examine the document through a racial equity lens.

In addition, an omission from our assessment should not: 1) be interpreted as a section having no racial equity impact or 2) invalidate another party's concern.

This assessment is based on the introduced version of Bill 24-0001 and the Committee Print. It does not assess any versions that follow.

CORE reviewed the introduced version of the Comprehensive Plan and the Committee Print with a racial equity lens. Though the Committee Print will continue to be updated and amended through second and final reading, our analysis only covers the Committee Print circulated on April 14, 2021. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Racially equitable implementation is critical.

The Council legislates and the executive branch implements. Given this, part of CORE’s review centered around whether Bill 24-0001 provided the comprehensive guidance, tools, and resources necessary to implement the policies and actions using a racial equity lens. The Recommendations Section identifies key focus points to ensure racial equity is embedded throughout the implementation phase.

APPENDIX

Please note that this preliminary analysis was conducted on the Office of Planning’s introduced version of the Comprehensive Plan.

To arrive at the eight policy and process themes in the REIA, CORE reviewed nine of the Plan’s elements in detail, line-by-line.

These reviews began with research on the racial inequities that exist today in areas like transportation, housing, and education facilities. Next, CORE highlighted sections of concern within the element. Recurring concerns were converted to feedback themes. Feedback themes for each element are listed below in **BOLD UPPERCASE** letters, along with illustrative examples from the Comprehensive Plan (as introduced).

ANALYSIS: LAND USE ELEMENT

The goal of the [Land Use Element](#) is to “establish the basic policies guiding the physical form of the District.” The Land Use Element serves as the foundation of the Comprehensive Plan and “provides direction on a range of development, preservation, and land use compatibility issues.”

An analysis of the Land Use Element’s policy proposals must begin by acknowledging how government-sanctioned practices first led to the [forceful removal of Indigenous people](#) at the expense of [colonial expansion](#), land growth, wealth accumulation, and development. With that understanding, we then begin to examine the District’s current landscape and racial disparities. Land use decisions impact key social, economic, and wellbeing indicators—determining housing prices, housing choice, rent burden, a resident’s access to transit, proximity to necessities, amenities, commute time, and healthcare options. There are deep and pervasive racial inequities in each of these stated indicators.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

20,000

20,000 Black residents were [displaced](#) from the District of Columbia between 2000 and 2013.

40%

Forty percent of the District’s Black children are living in high poverty areas. 25% of *all* children were [living in areas of racialized concentrated poverty](#).

\$3,100

The [average monthly rent](#) for a DC two-bedroom was \$3,100 in 2020. Tenants must make more than \$132,000/year to pay twenty-eight percent or less of their income on rent.

The Land Use Element takes some important steps towards advancing racial equity, like speaking to the need for *permanent, affordable rental and for-sale multi-family housing adjacent to transit*. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in land use are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
307.9	<p>The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area.</p>	<p>THIS SECTION NOTES THAT THE “FUTURE LAND USE MAP (FLUM) EXPRESSES THE DESIRED INTENSITY AND MIX OF USES...” BUT OMITTS WHO DESIRES THESE INTENSITIES AND USES.</p> <p>The Framework Element explicitly calls for communities of color and “those most impacted by structural racism” to be “meaningfully involved in the creation and implementation of institutional policies and practices.” However, the Land Use Element does not actively encourage community participation in innovative ways, explicitly mention Black communities and other communities of color, or offer general guidance on methods to encourage community participation (see</p>

		<p>Framework Element, page 33). Since 2006, twenty-nine Small Area Plans have been completed. However, the SAP process should be more transparent, predictable, and used as an opportunity to foster greater public participation in a racially equitable way.</p>
308.4	<p>Infill development may also include the restoration of vacant and abandoned structures. In 2003, there were an estimated 2,700 vacant and abandoned residential properties in the District. While the number has declined since then, some parts of Washington, DC continue to have a relatively higher amount of vacant buildings.</p>	<p>CRITICAL PARTS OF HISTORY ARE OVERSIMPLIFIED AND ERASED.</p> <p>This section leaves the impression that vacant or abandoned structures are naturally occurring phenomena rather than outcomes of discriminatory federal and local practices, such as predatory lending, the housing bust and foreclosure crisis that exacerbated wealth inequities, and the devaluation of assets in Black neighborhoods.¹ By not acknowledging <i>how</i> these conditions came to be may explain the section’s failure to articulate <i>why</i> “some parts of the District continue to have a relatively higher number of vacant buildings” than other parts of the city. (Also see Sections 311.2 and 311.4.) According to American Community Survey data, Ward 8 has the highest vacant housing units at just over thirteen percent compared to Ward 3, which has the lowest at about six and a half percent.</p>
310.6	<p>During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities. This does not mean that all neighborhoods should become the same or that a uniform formula should be applied to each community. Rather, it means that each neighborhood should have certain basic assets and amenities. These assets and amenities should be respected and enhanced where they exist today and created or restored where they do not.</p>	<p>THE ELEMENT DEVIATES FROM THE GOALS OF THE FRAMEWORK ELEMENT.</p> <p>This section illustrates how the Land Use Element deviates from the goals set forth in the Framework Element. The Framework articulated the need to 1) target support to communities of color through policies and programs; 2) center and “focus on the needs of communities of color”; and 3) remove barriers so that such communities can participate and make informed decisions in the planning process.</p> <p>First, to only “strive for greater equity” is inconsistent with the Framework’s goal to eliminate racial inequities. Further, the focus must be on racial equity, not just equity. Second, language such as “greater equity across all neighborhoods,” fails to center the needs and experiences of communities of color in the District. Third, instead of “focusing on the needs” of communities of color we should leverage and cultivate the leadership and expertise that exists within Black communities and other communities of color. Next, language such as “assets and amenities should be respected” places the focus on assets and amenities instead of explicitly focusing on the residents of those neighborhoods where these assets and amenities should be restored or created. Finally, using the phrase “basic assets” is unclear. Who gets to determine basic? And giving Black</p>

¹ In 1956, the Federal Aid Highway Act, signed by President Dwight Eisenhower provided local municipalities with funding for highway construction costs. This Act created massive and hasty freeway projects. These projects displaced thousands of Black and brown residents, destroyed Black and brown neighborhoods, confiscated the homes of Black residents, and led to [decades of litigation](#). During that time, many of those homes sat vacant.

		communities “basic” amenities while other communities already have more will likely maintain or widen racial inequities.
310.22	Conduct an ongoing review with periodic publication of social and economic neighborhood indicators for the purpose of targeting neighborhood investments, particularly for the purposes of achieving neighborhood diversity and fair housing .	PROVISIONS TO TRACK, EVALUATE, OR ASSESS ADVERSE IMPACTS ON BLACK COMMUNITIES ARE NOT INCLUDED. The policies and actions in the Comp Plan can only advance racial equity if the proposed policies and actions are “ specific, measurable, attainable, relevant, and timely .” This section is vague, does not mention racial equity considerations, or define what neighborhood diversity is. In addition, nowhere does the Land Use Element explicitly give directions to close racial inequities nor does it expressly call for the creation of, monitoring of, or direct reporting of measures that can gauge the impact of proposed policies and actions on achieving racial equity (for example, see Section 310.22).

ADDITIONAL ISSUES/CONCERNS

PRIVATE INVESTMENT IS HEAVILY RELIED ON: Although leveraging private investment is an important development strategy, at times the Land Use Element appears to heavily rely on that investment instead of encouraging innovative or proven public strategies and sustained public investment.

For example, section 315.4 notes how the goal is to “free up land” on the one hand but then proposes to make it available for *both* public and private investment. The section is also silent on how the plans to reorganize and consolidate would be executed, who helped develop the aforementioned plans, what the government’s role would be, and what the role of private developers would be.

AMBIGUOUS LANGUAGE, UNDEFINED TERMS, AND WEAKENED LANGUAGE ARE USED: The Land Use Element does not define terms such as “affordable housing” and “range of incomes” (among others) that may help the public, OP, and zoning commissioners implement and understand the policies. Much of the element’s language is weak—it more often expresses the District’s aspirations as opposed to their commitment and obligation to the stated policies or actions (For additional examples, see Section 310.8 (use of aspirational tones); 310.11 (which does not define what constitutes an “area characterized by vacant, abandoned, and underused older buildings), and Sections 313.14 and 306.13 (which strike stronger existing language for weaker language).

ANALYSIS: TRANSPORTATION ELEMENT

The [Transportation Element](#)'s goal is to “create a safe, sustainable, equitable, efficient, and multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.”

To examine the Comprehensive Plan’s policy proposals, it is critical to examine the District’s current transportation landscape and how the landscape is deeply connected to racial disparities in commuter experiences, environmental and health impacts, along with access to grocery stores, schools, health care, and access to commercial retail. Racial inequity in the District’s transportation landscape has historical roots in the segregation, displacement of, and disenfranchisement of Black, Indigenous, and residents of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) is seventeen percent in Wards 7 and 8. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

48%

Forty eight percent of DC’s [bus riders](#) are low-income, compared with eighteen percent of rail ridership.

51%

Fifty one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7.

The Transportation Element takes important steps towards advancing racial equity, like acknowledging that transportation should not be a barrier to economic opportunity in the District (Section 403.13). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to racial transit inequities and accessibility divides are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
408.2	Washington Metropolitan Area Transit Authority (WMATA) was created in 1967 by an interstate compact to plan, develop, build, finance, and operate a balanced regional transportation system in the national capital area. Construction of the planned 103 mile Metrorail system began in 1969 and was largely funded by the federal government. The first phase of Metrorail began operation in 1976 and was completed in early 2001.	<p>THE CONTENT IS AHISTORICAL.</p> <p>WMATA’s history is mentioned, but the driving force behind the metro is not. By omitting the full history of its creation, the narrative about residents’ proximity to the Metro may enable exclusionary policies that do not consider racial equity. When the element does recognize the history of the District’s transportation systems, the history shared is vague and excludes defining moments in which Black residents and other residents of color have been excluded from transit systems.</p>

<p>408.2</p>	<p>While much of the District is within a half mile of a station, some areas— such as Georgetown, the New York Avenue corridor, and Bolling Air Force Base—are not.</p>	<p>PLACES, NEIGHBORHOODS, AND COMMUNITIES ARE INCONSISTENTLY MENTIONED.</p> <p>This section omits several areas that are not within a half mile of a station (such as Hillcrest and Fairfax Village). These omitted areas are in Ward 8, which is the ward of residence for many Black and Brown residents. Despite being focused on transportation throughout the District, this element inconsistently mentions specific places that are impacted by or will be impacted (see Map 4.1 within this element).</p>
<p>400.2</p>	<p>The critical transportation issues facing the District are addressed in this element. These include:</p> <ul style="list-style-type: none"> • Eliminating fatalities and serious injuries on the transportation network; • Expanding the District’s transportation system to provide alternatives to the use of single-occupant autos; • Enhancing the District’s corridors for all modes of transportation; • Increasing bicycle and pedestrian connections, routes, and facilities; • Improving the efficiency of the existing transportation system; • Investing in bridge and roadway maintenance and repair; • Investing in transit network maintenance and repair; • Reducing pollution and negative health and environmental effects resulting from transportation; • Promoting transportation demand management (TDM). 	<p>STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM ARE NOT CONSISTENTLY ACCOUNTED FOR.</p> <p>Racial equity and accessibility are not listed as goals, despite these being critical transportation issues. Research notes that transportation policies have historically excluded a racial equity lens. This is especially true in DC, dating back to the early fight against freeways in the District. By not centering racial equity in the goals of the element, Black residents will continue to be negatively impacted.</p> <p>This section goes into detail about improving outcomes and promoting access yet does not discuss the glaring disparities in the District’s transit. It acknowledges the existing “pollution and negative health and effects resulting from transportation,” but fails to note these impacts disproportionately impact Black residents, particularly those living near major roadways such as 295 (see Map 4.4 in Section 412.3 and Map 4.5 in 412.8).</p> <p>Generally, the element does not take opportunities to consider how to eliminate barriers to transportation and environmental justice (Section T-5 on Technology and Innovation being an exception).</p>
<p>415.5</p>	<p>For instance, [the District] is helping to educate the public about various shared mobility options in the District, including point-to-point and traditional carsharing services. The District’s ultimate goal is to reduce reliance on single-occupancy vehicles and reduce vehicle miles traveled (VMT). To incentivize the use of shared cars and encourage the private sector to expand car-sharing programs, the District has designated strategic curbside parking spaces for these vehicles, accompanied by educational brochures to help explain this service to the public.</p>	<p>THE EXPERIENCES OF THE BLACK COMMUNITY AND OTHER COMMUNITIES OF COLOR ARE NOT CENTERED.</p> <p>This section mentions the District’s “ultimate goal...to reduce vehicle miles traveled” but only focuses on carsharing and technologies to achieve it. This does not center the experiences of communities in Wards 7 and 8, where ninety percent of residents are Black. These communities are hit hardest by lack of access to grocery stores and have to travel farther for employment opportunities, often by car.</p> <p>It also fails to center the experiences of residents that have been pushed out of the District but must rely on vehicle travel into the area for employment opportunities.</p>

		By not centering these experiences and racial equity, the section does not address one of the root causes of vehicle miles traveled in the District.
--	--	--

ADDITIONAL ISSUES/CONCERNS

THE COVID-19 PUBLIC HEALTH EMERGENCY IS NOT MENTIONED: Transportation patterns and accessibility have shifted due to the public health emergency. It is alarming for the element to not mention or consider these shifts a year into the public health emergency, given the disparate impacts that the emergency has had on Black communities and other communities of color.

VAGUE LANGUAGE IS USED: This makes it difficult to directly pinpoint exact communities, wards, racial groups, and ethnic groups that could be impacted by the policy at hand. This is dangerous when coupled with an incomplete understanding of the history that these policies have had on communities of color. This practice also enables race neutral policies.

ANALYSIS: HOUSING ELEMENT

The Housing Element’s goal is to develop and maintain new residential units to achieve a total of 36,000 units by 2025 that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents throughout all of Washington, DC’s neighborhoods.

To analyze this element, we first examined racial inequities in housing today—the result of centuries of government-sanctioned structural and institutional racism. For example, disparities in homeownership in 2021 are driven by income disparities, wealth gaps, discrimination in lending, historic segregation practices, and subjectivity in appraisals—to name just a few factors.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

35%

Thirty five percent of District households of color [own their home](#). The rates for all racial groups are: white (forty nine percent), Asian/Pacific Islander (thirty eight percent), Black (thirty five percent), and Latino (thirty percent).

86.4%

Over eighty six percent of adults who are [experiencing homelessness](#) are Black, yet only over forty six percent of District residents are Black.

58.1%

Fifty eight percent of Hispanic households in DC are rent burdened, [higher than any other group](#). In contrast, thirty four and a half percent of white District households rent-burdened.

The Housing Element takes important steps towards advancing racial equity, like encouraging production of affordable housing in high-cost areas (Section 503.10) and supporting development of residential units that meet the needs of larger families (505.15). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to housing inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
512.2	An important part of ownership is access to financing and real estate opportunity. In the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.	HISTORY IS OVERSIMPLIFIED OR ERASED. Redlining is mentioned but the text fails to mention that the practice was race-based and ethnicity-based and that its lasting and prevalent effects targeted Black residents . Ignoring the past will not erase its audacities. At the very least, it will maintain them—and likely, it will exacerbate them.

513.1	<p>Homeownership...stood at forty-two percent in Washington, DC [in 2017]. Instability in the homeownership market and limited access to credit has caused many to select rental housing. These national factors are affecting all cities, but the District still has one of the lowest rates of homeownership in the country...</p>	<p>AGGREGATE STATISTICS ARE CITED.</p> <p>While the homeownership rate for all District residents is around 42%, the rate for white residents is forty-nine percent, higher than the rate for all communities of color. Aggregate statistics ignoring disparities and may encourage policies to improve outcomes for all residents—while ignoring (and perhaps exacerbating) gaps between white residents and residents of color.</p>
513.2	<p>Home prices create a significant obstacle to increasing the homeownership rate. In September 2015, only thirty-eight percent of the homes on the market with two or more bedrooms were affordable to the median income family. While the recent increase in the supply of condominiums has improved homeownership prospects somewhat, the options for multigenerational families continue to be limited.</p>	<p>THIS SECTION DOES NOT DISAGGREGATE DATA BY RACE OR ACCOUNT FOR RACIAL DIVIDES IN HOUSING BURDENS.</p> <p>Families of color are more likely to live in multigenerational households—meaning that they have a greater need for larger homes but even fewer options. Acknowledging the race is important to 1) understand if racial groups are facing multiple barriers to homeownership and 2) emphasize that <i>not</i> creating or following through with these policies will exacerbate racial inequity.</p>
516.4	<p>Permanent housing is generally more acceptable to communities than transient housing and more conducive to the stability of its occupants.</p>	<p>PRIVELEGED RESIDENTS ARE PRIORITIZED.</p> <p>This section raises two issues: 1) describing residents of permanent/transient housing as mutually exclusive to “communities” only reinforces and condones opposition to homes for <i>all</i> the District’s residents, and 2) the ordering of this sentence places the mere preferences of the neighborhood’s current residents first—over the quality of life benefits for vulnerable residents. Permanent housing is a proven, evidence-based response to chronic homelessness that should not be mentioned as an afterthought. These instances may seem subtle, but in aggregate convey a concerning and false hierarchy.</p>
511.7	<p>Tenants should be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.</p>	<p>IDEALS ARE THE NORM, RATHER THAN REQUIREMENTS.</p> <p>Previously, the section <i>required</i> that tenants were provided information about their rights rather than this being an ideal. Oftentimes, rollbacks from “must” and “ensure” to “should” leave already vulnerable communities more vulnerable.</p>

ADDITIONAL ISSUES/CONCERNS

COVID-19’S IMPACTS ARE DOWNPLAYED: The COVID-19 health emergency is only listed twice in the Plan, despite it having a [profound impact](#) on the District’s housing outcomes—especially on residents of color and other [vulnerable communities](#).

THERE ARE CONTRADICTIONS: The Comprehensive Plan’s Framework Element acknowledges and accepts that the lengthy document contradicts itself at times. However, this is problematic from an equity lens: one section may portray one set of ideals and another may lay out a contradictory recommendation or policy.

LANGUAGE IS VAGUE OR BROAD: Vague language like “greatest extent feasible,” “substantial share,” “based on feasibility” creates room for interpretation which may further disadvantages residents of color.

ANALYSIS: ENVIRONMENTAL PROTECTION ELEMENT

The Environmental Protection Element’s goal is to ensure that the District’s “natural and man-made environment” is protected, restored, and enhanced.

To examine the Comprehensive Plan’s policy proposals, it’s critical to examine the District’s current environmental protection landscape and its historical contribution to environmental racism. The District’s current disparities in health outcomes, air quality, the concentration of industrial uses, heat vulnerability, and chemical exposure are linked to the segregation and displacement of Black, Indigenous, and residents of color. Historical practices such as racial covenants have consistently forced Black and brown residents to [live near toxic facilities](#) and highly polluted areas.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) in Wards 7 and 8 is seventeen percent. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

3

Ward 3 has the most mature [tree canopy](#). Vegetation can reduce the potential for urban heat islands. Wards 7 and 8 have the youngest canopy (due to District efforts to increase it).

51%

Fifty-one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7. This means that it is harder for the residents of these wards to access essential resources during an extreme weather event.

The Environmental Protection Element takes important steps towards advancing racial equity, like recognizing that some residents have been and continue to be disproportionately impacted by environmental practices (Section 600.11a and 628.2). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to environmental inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
603.12	Evaluate expanding restrictions and/or require adaptive design for development in areas that will be at increased risk of flooding due to climate change . Analyses should weigh the requirement to account for climate risks with the needs of a growing District.	THE CONTENT IS RACE NEUTRAL. The proposed analyses do not explicitly consider racial equity in the development of flood-prone areas, despite communities of color facing increased vulnerabilities due to climate change. By not citing disaggregated data, it is difficult to pinpoint exact communities, racial groups, and ethnic groups that could be impacted by the policy at hand.

606.1

Washington, DC is situated at the confluence of two great rivers: the Anacostia and the Potomac...For years, the Anacostia suffered the fate of being Washington DC's lesser known and less maintained river. **As its natural beauty yielded to industry, its waters became polluted** and the river became a divide that separated some neighborhoods from the rest of the District.

THE CONTENT IS AHISTORICAL.

This section mentions the impact of historical events that allowed the Anacostia River to become heavily polluted and "some neighborhoods" to be divided from the rest of the District. However, it fails to mention how the practices came to be and does not list which locations experience and which residents live with the burden of these impacts most heavily.

When the element does recognize the history of the District's environment policies and decisions, the history shared is vague and excludes defining moments in which Black, Indigenous, and residents of color have been displaced, discriminated against, and excluded in a way that negatively impacts their health, economic standing, and quality of life.

THE LANGUAGE IS VAGUE.

Neighborhoods, communities, or wards are not mentioned by name. This makes it harder for readers to understand the impact on exact locations and harder to hold policymakers accountable to achieving racial equity in those areas. Vague language such as "throughout the District," "some areas," and "places like" creates room for interpretation which may lead to further disadvantaging of residents of color.

ADDITIONAL ISSUES/CONCERNS

FUTURE RESIDENTS AND NEW DEVELOPMENTS ARE THE FOCUS: The Environmental Protection Element heavily focuses on protections regarding new developments. While this is important to hold developers accountable, it is not balanced with protections regarding existing communities, especially those disproportionately impacted by environmental racism.

ENVIRONMENTAL JUSTICE PRINCIPLES ARE INCLUDED INCONSISTENTLY: The element starts off strong by mentioning the importance of environmental justice, but eventually falls short of including these principles throughout the entirety of the element. Additionally, the element rarely mentions how corporations or developers will be held accountable beyond general suggestions of how new development should take place. Also, while municipal and federal benefits of industrial sites (such as trash transfer sites) can accrue to all residents, the [negative impacts](#) are often only felt by some. This violates [the Principles of Environmental Justice](#).

ANALYSIS: ECONOMIC DEVELOPMENT ELEMENT

The stated goal of the [Economic Development Element](#) is to “drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status.”

To analyze this element, we first examined how specific actions and policies proposed tackled issues of wealth and income inequality. We also explored whether the proposed actions and policies are designed to combat structural inequality, whether and how they employ new approaches to close the racial wealth gap, or whether they center the needs of communities of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

81x

The net worth of typical white households is **eighty one times greater** than the net worth of typical Black households in the District.

14%

Fourteen percent of District businesses are Black owned, although Black residents are 45 percent of the population. By contrast, **seventy one percent of businesses in DC are white owned**, while white residents account for forty two percent of the population.

67%

Sixty seven percent of Black and fifty nine percent of Latinx residents work full-time **and earn less than \$75,000**, compared to just thirty-four percent of their white counterparts and forty-three percent of their Asian or Pacific Islander counterparts.

The Economic Development Element takes important steps towards advancing racial equity, like leveraging sustainability policies to increase the number of entrepreneurs within new and emerging industries; calls for a focus on “economically disadvantaged individuals”; as well as attempting to apply an “equity focus” on business and workforce development programs (Sections 705.6, 717.11). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
703.15	<p>Support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance, promotion of District products and services, and market development.</p>	<p>POLICIES AIM TO IMPROVE OUTCOMES FOR EVERYONE, NOT SPECIFICALLY COMMUNITIES OF COLOR.</p> <p>The Framework Element’s goal is to target assistance to communities by need. In the District, the communities that are socially and economically vulnerable also tend to be Black and Brown. COVID-19 exploited and exacerbated these vulnerabilities: a recent report that forty one percent of Black owned businesses had to close, compared to seventeen percent of white owned businesses. Therefore, it is not enough to simply promote local entrepreneurship and rely on</p>

		existing technical assistance programs that may or may not be reaching businesses owned by people of color.
703.10a	This program [Opportunity Zones], although unproven, could be a useful tool in attracting investment in communities that have historically been overlooked by many investors.	<p>THE ELEMENT RELIES ON UNPROVEN PROGRAMS.</p> <p>The Economic Development element seems to only mention minority or equity in the context of <i>incorporating</i> businesses or communities into <i>existing</i> programs, or in studying these communities (see Sections 714.6, 714.3a, 714.20) in unproven or pilot programs. As acknowledged in the text, this specific section is not based on any data or proven outcomes.</p> <p>Recently, the Urban Institute found that the Opportunity Zones (OZ) incentive is not living up to its economic and community development goals. They also found that although OZs were designed to spur job creation, most OZ capital is flowing into real estate and not into operating businesses. As drafted, this section focuses on attracting investment to neglected areas but is silent on ensuring the community benefits from that investment or that the District can ensure an equitable and participatory community-driven approach. Without such assurances, this section has the potential to further advantage investors at the expense of historically neglected areas, which in the District, tend to be communities of color.</p>
700.5	Economic development is about more than simply increasing the number of jobs and improving the District’s finances. It is also about ensuring that all residents have opportunities to thrive economically.	<p>THERE IS NO ACCOUNTING FOR STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM.</p> <p>The element does not deal with structural racism or the resulting inequities in any substantial or comprehensive way. The element is correct in saying that “economic development is about more than increasing the number of jobs and improving the District’s finances.” It should also be about closing the racial wealth gap and eliminating income inequality. To do so, it must explain why <i>certain</i> residents have had trouble “accessing “opportunities to thrive economically.” By not addressing the historical root causes of existing structural inequalities, this narrative may repeat patterns of exclusion.</p> <p>Broadly, the element does not mention barriers preventing growth along racial lines (for example, student loan debt, retirement savings, or asset-generation) and does not offer a comprehensive or systemic approach to addressing those barriers.</p>

ADDITIONAL ISSUES/CONCERNS

PERFORMANCE-DRIVEN ACCOUNTABILITY IS NOT PRIOTITIZED: In some instances, the element proposes supporting programs that may be obsolete, or have not demonstrated measurable success (see DSLBD’s [CEED program, the Made in DC program, or Healthy Food programs](#), all of which went unfunded for Fiscal Year 2021 but are referenced in the Comp Plan). Policies and actions within the element must be up to date and sufficiently resourced to have real or meaningful impact.

DATA IS NOTE DISAGGREGATED BY RACE: Disaggregating data by race helps us to better understand existing barriers and gaps facing communities of color. That data allows us to design actions and policies that will achieve equal outcomes for people of color relative and in proportion to the inequities those communities face.

VAGUE LANGUAGE AND RACE NEUTRAL POLICIES ARE PREVALENT: “Racial equity” is not mentioned once in the [seventy-five page document](#). Only vague references to “equity,” “minority,” or “economically disadvantaged” are made.

ANALYSIS: PARKS, RECREATION, AND OPEN SPACE ELEMENT

The goal of the Parks, Recreation and Open Space Element is to “preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs through universal access, promote health and wellness, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of the national capital.”

To analyze this element, we examined the current landscape of the District’s parks, recreation and open space against the historical inequity caused by Jim Crow segregation. This disparities in parks and recreational access [caused by its legacy](#) remain to this day.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

.5

Some residents in Ward 7 have to walk [more than a half mile](#) to find District owned recreation space, despite parks accounting for more than a fifth of DC’s land.

38%

Thirty eight percent of Ward 7 residents had [no exercise or physical activity](#) in the last 30 days. In Ward 8, it is about twenty six and a half percent. It is six percent in Ward 3 and eight percent in Ward 2.

86%

Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black.

The Parks, Recreation, and Open Space Element takes important steps towards advancing racial equity, like recognizing how different parts of the District may have differing interests and the need to coordinate with sister agencies such as DC Public Schools (DCPS) to improve the appearance and usefulness of schoolyards and outdoor recreational facilities.² However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in parks and recreational spaces are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
812.7	Investments in infrastructure have helped deliver a connected waterfront, so that the Anacostia River no longer divides neighborhoods.	HISTORICAL CAUSES OF INEQUITIES OR EXISTING INEQUITIES ARE NOT DISCUSSED. Although physical improvements to projects such as the Suitland Parkway/I-295 interchange, the Anacostia Waterfront Initiative, and the Frederick Douglass Memorial Bridge are connecting communities, the Anacostia River remains an imaginary racial dividing line. Today, neighborhoods east of the Anacostia River continue to face disinvestment in infrastructure, lack of connectivity, and lack of active green space.

<p>810.19</p>	<p>Establish a system to maintain and regularly update data and maps on parks, recreational facilities, and programming offered by DPR and affiliated providers to measure improvements in levels of service and document achievements.</p>	<p>DECISION-MAKING PROCESSES DO NOT CALL FOR DISAGGREGATED DATA AND MEASURING AND EVALUATING RACIAL EQUITY.</p> <p>Despite disparities in the distribution of parks and recreational facilities across the District, this section does not require needs assessments and demographic analyses to disaggregate data by race, or to assess if and where racial inequalities may exist. Disaggregating data by race and analyzing racial equity impacts for any recreational facility assessment can be used to better inform how park improvements are prioritized. See Actions PROS-2.1.A, 2.1.B; 2.2.1.</p>
<p>810.15</p>	<p>Evaluate proposed park facilities to determine their ability to generate revenue and help recover operational and maintenance costs. When developing new facilities, assess the projected operation and maintenance costs prior to requesting capital funding approval.</p>	<p>POLICIES LEAVE ROOM FOR INEQUITABLE IMPLEMENTATION.</p> <p>This section calls for park proposals to be evaluated for their ability to generate revenue and recover maintenance costs. However, if an evaluation shows a facility will not generate sufficient revenue, no guidance is provided. This is concerning if evaluations determine areas in high need communities or Black communities will not generate revenue.</p> <hr/> <p>MORE INVESTMENT INTO MAINTAINING DISTRICT PARKS, RECREATION, AND OPEN SPACES IS NEEDED.</p> <p>It appears the District may need to consider how to improve the efficiency of a dedicated funding source to ensure parks are attractive, safe, and receive equitable funding. The District spends less on park operations and maintenance on a per capita basis than peer cities, such as Portland, Minneapolis, and Portland (See Section 810.2).</p>
<p>809.6</p>	<p>The District has one of the highest number of aquatics facilities per capita in the country. However, sometimes these facilities are not in the best location or best condition, and sometimes they are not large enough to meet demand.</p>	<p>WHEN LANGUAGE ABOUT PLACE OBSCURES SYSTEMIC CAUSES, IT IMPEDES SYSTEMIC SOLUTIONS.</p> <p>It is unclear what this section means by “not in the best location.” As Brookings has noted, achieving racial equity requires awareness of how we use language to describe both people and places. Describing a site as “not in the best location,” without explaining what that means can reduce “communities to only their challenges, while concealing the systemic forces that caused those challenges and the systemic solutions needed to combat them.”</p>

² This section does not mention how the community will be involved in planning decisions nor does it note existing inequities. For example, in Ward 7, there are [thirteen public schools](#) that are not open for public recreational use (versus four schools in the program).

ADDITIONAL ISSUES/CONCERNS

THE DEVELOPMENT OF GREEN SPACES AND PUBLIC LANDS VARIES GREATLY DEPENDING ON GEOGRAPHIC LOCATION: Section 805.3 acknowledges the need for parks may be more critical in “some areas” but fails to specify which areas of the District would benefit.

THERE IS A LACK OF CONSIDERATION FOR THE UNHOUSED POPULATION WHO UTILIZE DISTRICT PARKS AND OPEN SPACES: The element fails to mention the [unhoused population](#), many of whom encamp in DC parks. Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black. The element does not account for their experiences or needs.

ANALYSIS: EDUCATIONAL FACILITIES ELEMENT

The goal of the Educational Facilities Element is to “provide facilities that accommodate population growth and inspire excellence in learning; create an adequate, safe, and healthy environment for students; and help each individual achieve their fullest potential while helping to build and strengthen local communities.” Educational facilities refer to DCPS, DC Public Charter Schools (DCPCS), local colleges and universities, and child development facilities.

Institutional and structural racism have led to [inequitable outcomes](#) for Black DC residents and other residents of color. Today, the District’s educational facilities remain highly segregated and [academic achievement gaps](#) persist.

To analyze this element, we examined the current landscape of the District’s educational facilities and asked: How are educational facilities currently accommodating population growth and how does the element plan to accommodate for future growth? Is learning racially equitable across the District? Are schools adequate, safe, and fostering healthy environments in a racially equitable way? Are investments in local communities racially equitable?

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

90%

Ninety percent of District-owned school facilities graded [in poor condition](#) in SY2017-18 were in Wards 5, 7, and 8.

18

The average driving [commute time](#) of all sixth-grade students in DC is 12.7 minutes. For sixth-grade students in Ward 7, the average driving time is 18 minutes.

94%

Ninety-four percent of DC neighborhoods with a majority white population had less than ten percent of their families [living below](#) the poverty line, while that was true of just twenty-two percent of majority Black neighborhoods.

The Educational Facilities Element takes important steps towards advancing racial equity, like acknowledging the importance of leveraging institutions such as the University of the District of Columbia and maximizing the use of in-school facilities and spaces. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to educational facility inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1202.4	The trend of population growth in the District suggests that there will be many new students in need of education, necessitating additional school facility space and financial resources.	DISAGGREGATED DATA ON POPULATION TRENDS IS NOT PROVIDED. The Element frequently mentions that the District’s general and school age population is expected to grow over the next few years. However, there is no mention of how the anticipated racial demographic changes may impact growth.

1204.1	Washington, DC has made significant progress toward modernizing DCPS school buildings , investing more than \$2 billion since 2007 to modernize 73 school buildings. The District has budgeted an additional \$1.6 billion to modernize 20 DCPS school buildings from 2019-2024.	IMPROVEMENTS TO EDUCATIONAL FACILITIES IN A RACIALLY EQUITABLE WAY IS NOT EXPLICIT. A November 2019 DCPS report found that most of the facilities in Wards 7 and 8 were labeled as poor or very poor. Yet, the element does not discuss inequities faced by Black and Latinx students. These inequities range from the lack of school resources and empty libraries to minimal mental health supports and the urgent need for equity reforms in the school modernization process .
1210.4	Each SIT [School Improvement Team] includes parents, neighbors, and members of the larger community. This team provides feedback throughout design and construction and helps disseminate information about the school improvement to peers and constituencies.	THERE ARE MISSED OPPORTUNITIES FOR COMMUNITY INVOLVEMENT. The current plan mentions the creation of School Improvement Teams (SIT) at every school. These committees include school administrators, instructors, parents, and other community members—however, the plan does not mention including students.
1204.10	Strongly support the goal of making neighborhood schools an appealing “school of choice,” where students’ academic and personal achievements are nurtured, so that children do not have to travel long distances to schools across the District.	SCHOOL CHOICE IS PLAYING OUT INEQUITABLY ACROSS THE DISTRICT. In the 2017-18 school year , more than 37,000 students (or forty-one percent) crossed ward boundaries to attend school. For example, 488 students traveled from Ward 8 to Ward 4 for school, and 34 students traveled from Ward 4 to Ward 8. This shows how school choice is playing out differently among families in the District.
1216.3	As a result of funding for the PK Enhancement and Expansion Act of 2008, as well as other quality of life improvements, more families are choosing to raise their families in the District , resulting in an increased demand for child development facilities that serve children six weeks to three years of age.	HEAVY EMPHASIS IS PLACED ON NEW FAMILIES AND TRANSPLANTS. Long before massive displacement and other forces of gentrification led to rapid demographic transformation , the District, in the 1970s, peaked at over seventy percent Black. As drafted, this section ignores the fact that Black families are and always have been in the District.

ADDITIONAL ISSUES/CONCERNS

THERE IS NO PLAN FOR VIRTUAL LEARNING: The Covid-19 pandemic halted in-person learning for the last year. As schools have made the switch to virtual learning and hybrid models, issues around racial equity, learning loss, access to services, who is able to attend when schools reopen, and an equitable reopening present new challenges to racial equity in education. The element fails to consider these challenges.

COLLABORATION IS ENCOURAGED BUT NOT SPECIFIED: Section 1216.11 requires the executive branch to “explore collaborations with educational and business partners...to increase the availability of quality early childhood education, child development, after-school, and pre-school programs for all residents, especially low-and middle-income households, and families of children with disabilities.” This section should specify the types of

partners the District should seek. The District should explore collaborations with organizations that are led by Black people and other communities of color or have demonstrated proven success working with Black communities and other communities of color.

ANALYSIS: INFRASTRUCTURE ELEMENT

The Infrastructure Element’s goal is “to provide high-quality, robust, efficiently managed and maintained, and properly funded infrastructure to meet the needs of residents, workers, and visitors in an accessible and equitable way, as well as supporting future change and growth.”

An examination of the Comprehensive Plan’s policy proposals requires analyzing the current landscape of the District’s infrastructure landscape and asking, “is investment in local communities racially equitable?” Historically, the District’s infrastructure investments have not been racially equitable. From the digital divide to water facilities, historically Black communities of Wards 7 and 8 have been overlooked.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

70%

Less than seventy percent of households in Wards 7 and 8 have internet access.

5

Despite [thirty five percent](#) of Ward 7 residents relying on public transportation, only [five bus stops](#) in Ward 7 have [a shelter](#).

0

In 2009, there were zero green rooftops in Ward 7 compared to twenty-nine in Ward 2.

The Infrastructure Element takes important steps towards advancing racial equity, like enhancing coordination among relevant agencies and utilities when building new or modernizing infrastructure. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to infrastructure inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1312.5	<p>Minimizing the digital divide through solutions such as expanding public wireless internet access, digital literacy programs, and access to job opportunities and technical internships that focus on digitally underserved neighborhoods are core goals for Washington, DC.</p>	<p>THE DIGITAL DIVIDE IN PREDOMINATELY BLACK COMMUNITIES IS NOT ADDRESSED.</p> <p>This section does not define what a “digitally underserved neighborhood” is. Wards 7 and 8 have a ninety two percent and eighty nine percent Black population respectively. However, only forty five percent of households in Ward 7 and forty eight percent of households in Ward 8 have broadband subscriptions, compared with eighty two percent of households in Ward 2 and eighty six percent in Ward 3. The Covid-19 pandemic has multiplied the consequences of the digital divide.</p>

<p>1319.1</p>	<p>The goal for these efforts is to create vibrant new communities that are effectively integrated with surrounding neighborhoods, and that offer a high-quality experience for residents, workers, and visitors. Having infrastructure keep pace with growth will be critical in coming years, given that existing infrastructure systems may require modernization or expansion to meet the needs of these new areas.</p>	<p>THE ELEMENT DOES NOT EXPLICITLY MENTION RACIAL EQUITY.</p> <p>This section opens by listing several established communities and then proceeds to describe the goal of creating vibrant new communities. Other parts of the Comp Plan (specifically in Land Use) refer to communities that are largely Black or Latinx as “transitioning, “emerging, or “underserved” and refers to whiter, more affluent communities as “established” or “new.” As such, this language does not provide targeted assistance to those in the most need and is likely to exacerbate inequities.</p> <p>Broadly, this element does not explicitly mention the need for racially equitable infrastructure, describe how the District can ensure racially equitable infrastructure, or illustrate what racially equitable infrastructure should look like. It also does not acknowledge the history that has led to infrastructure inequities.</p>
<p>1302.7</p>	<p>This section contains a map that shows the Washington Aqueduct Service Area and Major Facilities as of 2018.</p>	<p>THE DISTRICT HAS NOT EQUITABLY INVESTED IN INFRASTRUCTURE.</p> <p>A review of the referenced map shows there are no major facilities to the east of the Anacostia River. However, as drafted, it is unclear exactly what the impacts of this are.</p>
<p>1304.2</p>	<p>Some areas in Wards 7 and 8 have historically experienced low water pressure. To improve the pressure, DC Water built a new pumping station in 2008, and in 2018, completed the construction of a new two-million-gallon water storage tower and new transmission mains at St. Elizabeth's.</p>	<p>THE LACK OF INFRASTRUCTURE IN WARDS 7 AND 8 PRESENT ONGOING PROBLEMS.</p> <p>The purpose of the pumping station is unclear given that the water pressure remains low after this project was completed. How is the District or DC Water monitoring progress to gauge effectiveness? The Comp Plan consistently references positive outputs, without examining the true outcomes of efforts.</p>

ADDITIONAL ISSUES/CONCERNS

FUTURE TELECOMMUNICATIONS IS PLANNED, BUT RACIAL EQUITY IS NOT AT THE FOREFRONT: Section 1312.1 mentions that the District “seeks to implement telecommunications policies that advance its initiatives to broaden technology infrastructure and wireless accessibility throughout the District, often in coordination with private industry and federal stakeholders.” It is unclear what the District’s role in this process will be, how this will be implemented, and how it will be targeted to address racial inequities of the digital divide (the extent of which is highlighted in the two sections that immediately follow).

ANALYSIS: IMPLEMENTATION ELEMENT

The Implementation Element “describe[s] how the policies and actions in the Comprehensive Plan should be carried out.” A priority of this element is to link relevant recommended actions to zoning regulations to “facilitate making zoning not inconsistent with the Comprehensive Plan.”

The Implementation Element “addresses the manner in which land use planning policies are interpreted and applied on a day-to-day basis.” This analysis examines whether the element’s proposed solutions will exacerbate racial inequity, maintain the status quo of racial inequity, or help to eliminate or reduce racial inequities. The litmus test for every approved policy and strategy should be its ability to narrow existing racial inequities.

Consider these metrics on the implementation of the Plan:

2

The Office of Planning conducted two [periodic progress reports](#) since 2006, despite the DC Law requiring reports every four years in the interest of transparency.³

0

Zero [statutorily required](#) public hearings have been held on the District’s progress on Plan implementation.

1

One [environmental assessment](#) has been submitted to Council since 2002 despite [DC Law requiring](#) Plan amendments include an environmental assessment.

The Implementation Element takes important steps towards advancing racial equity. For example, Section 2512.1 states that progress reports “will include monitoring data, activity and impact information that is disaggregated by...race.” As noted above, this will only be effective if the Office of Planning submits timely and accessible progress reports. In addition, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
2501.2	An equitable District is one in which all residents have the same opportunities to thrive and prosper, where health outcomes are improved for all racial and ethnic groups, and environmental benefits are shared by everyone.	POLICIES ARE RACE NEUTRAL, NOT SPECIFICALLY FOCUSING ON IMPROVING OUTCOMES FOR COMMUNITIES OF COLOR. Policies and actions in the Comp Plan are not consistently designed to target Black communities and other communities of color. The majority of the citywide elements rely on overly vague language. In addition, many of the strategies throughout the Plan center inclusivity and <i>equality</i> more often than racial equity.

³ As drafted, Section 2512.1 does not add enforcement provisions to ensure progress reports are timely submitted and hearings are timely held.

<p>2502.5</p>	<p>To the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods, the transportation network, parking, and environmental quality are assessed and adequately mitigated.</p>	<p>EVALUATION OF RACIAL EQUITY IMPACTS ARE NOT CONSISTENTLY REQUIRED THROUGHOUT EACH STAGE OF THE PLANNING PROCESS.</p> <p>This section does not define what “positive impacts” are, how they can be maximized, and for whom these impacts are to be achieved for. It also does not define what “negative impacts” are. The development review process and decisions emanating from that process can and should establish a framework that applies a racial equity lens.</p>
<p>2505.4</p>	<p>Monitor social, economic, community, and real estate trends that might require land use actions or policy modifications. Incorporate current, reliable data in Washington, DC’s land use planning efforts, and use that data consistently across District agencies.</p>	<p>A ROBUST STRATEGY TO MONITOR, TRACK, AND EVALUATE OUTCOMES OR DISPARATE IMPACTS DOES NOT EXIST.</p> <p>This section does not acknowledge the need for disaggregating data by race. It follows a similar trend in the Comp Plan where explicit directions to close racial, social, and economic disparities via capital and program investments are not provided. In addition, the section does not expressly call for the creation of, monitoring of, or direct reporting about racial equity related measures.</p>
<p>2503.3</p>	<p>Small Area Plan work should consider competing demands, available staffing and time, and available funding. Such plans should address topics such as neighborhood revitalization and conservation needs, and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives.</p>	<p>THE DEVELOPMENT OF SMALL AREA PLANS DOES NOT REQUIRE THE APPLICATION OF A RACIAL EQUITY LENS.</p> <p>This section illustrates how the Implementation Element maintains expectations as opposed to disrupting or trying new approaches.</p> <p>Further, available funding and staffing should be aligned to reflect the commitments laid out by the Implementation Element. This is a principal flaw with the Comprehensive Plan. If staffing, funding, and resources are not allocated and provided, and done so in a way that will prioritize communities with the greatest level of need, inequities are likely to persist or be compounded.</p> <p>It also does not specify what “other implementation techniques” would be necessary to achieve the Plan’s objectives.</p>
<p>2507.1</p>	<p>The Zoning Commission, Board of Zoning Adjustment, and the DC Council itself provide formalized opportunities for public discourse on land use matters. The internet, e-mail, social media, and other technologies have made information instantly accessible to thousands of residents, enabling unprecedented levels of participation in community meetings, summits, and forums.</p>	<p>THE ELEMENT LACKS CONSIDERATION OF DIVERSE STRATEGIES TO ENSURE COMMUNITY ACCESS.</p> <p>This section takes important steps to ensure information is widely available to the public. However, it must also consider the digital divide in the District and find more effective ways to engage the entire community.</p>

<p>2507.3</p>	<p>Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation.</p>	<p>THE ONUS IS PUT ON THE COMMUNITY TO ENSURE THEIR OWN ENGAGEMENT.</p> <p>The onus must be on the District. First, the District should reflect on and research who engages, who is heard, who does not engage, and why that may be. This research should inform proactive identification and creation of new ways for residents to have their voices heard.</p> <p>In addition, the assumption that the community is not or has not engaged or attempted to engage the District should be interrogated.</p>
<p>2509.1, 2509.2, 2515.4</p>	<p>Capital Improvement Planning (CIP) provides one of the most important means to establish the Comprehensive Plan as the guiding document for future public investments.</p> <p>It is reviewed and updated on a regular basis to reflect changing priorities, unexpected events, and new opportunities.</p>	<p>CIP IS A MISSED OPPORTUNITY TO ENSURE RACIAL EQUITY IS AN INVESTMENT PRIORITY.</p> <p>This section presents a strong opportunity to center racial equity in budget considerations. The budget is where the rubber meets the road but unfortunately, there is no reference to prioritizing racial equity in this section. It is unclear how CIP will reinforce commitment and goals to racial equity.</p>

ADDITIONAL ISSUES/CONCERNS

THE ENVIRONMENTAL ASSESSMENT IS INCOMPLETE AND NON-EXHAUSTIVE: Based on [the law](#), the Mayor is required to submit an environmental assessment of the proposed Comp Plan amendments. However, the five page assessment does not provide any thorough assessment, evaluation, analysis of data, project-based assessment, or critical analysis.

TERMS DEFINED IN THE FRAMEWORK ELEMENT ARE NOT CONSISTENTLY USED: The Implementation Element offers an opportunity to reinforce and apply definitions established in the Framework Element and the Equity Crosswalk’s overview. However, terms such as “racial equity” or “equitable development” that were defined in the Framework (like in [Section 213.8](#)) rarely, if at all, appear in other Citywide elements.

GUIDANCE ON THE AMENDMENT SUBMITTAL PROCESS WAS STRUCK: Rather than striking this section, this process (laid out in Section 2515) requires clarity and specificity. This section also represents an opportunity to ensure that any zoning text amendment considers the potential for disparate impacts, ways to mitigate or eliminate potential disparate impacts, and ways to ensure public benefits for communities of color.

RACIAL EQUITY TRAINING FOR ZONING COMMISSION AND IMPLEMENTERS IS NOT MENTIONED: The Implementation Element represents an opportunity to be intentional in disrupting the status quo by building out new community led approaches. The District must ensure the Zoning Commission charged with making land use decisions is both committed and able to advance racial equity.

GLOSSARY

ACTION

A specific step to be taken by District Government to implement the policies in the Comprehensive Plan, such as the adoption of a new ordinance or completion of a capital improvement project; the accomplishment of a thing usually over a period of time, in stages, or with the possibility of repetition ([source](#))

ADMINISTRATION

1) The manner in which land use planning policies are interpreted and applied on a day-to-day basis; this includes the development review, small area planning, zoning, long-range planning, and community involvement activities that are used to carry out Comprehensive Plan policies 2) The officials in the executive branch of government under a particular chief executive ([source](#))

DEVELOPMENT REVIEW

The City process for reviewing and approving new buildings, alterations to existing buildings, and subdivisions ([source](#))

GUIDING PRINCIPLE

A statement of philosophy and basic values about the future of the city that sets the overall tone for the goals, policies, and actions in the Comprehensive Plan ([source](#))

LAND USE

Chapter of the Comprehensive Plan containing goals, policies, maps and actions to guide the future development and redevelopment of public and private property ([source](#))

PLANNING COMMISSION

A locally appointed commission that reviews plans and projects for consistency with the Comprehensive Plan, considers amendments to the Plan, and addresses long range planning issues; does not currently exist in the District of Columbia Government ([source](#))

POLICY

A specific statement of principle that implies clear commitment; a general direction that a governmental agency follows ([source](#))

RACIAL EQUITY

The elimination of racial disparities so that race no longer predicts opportunities, outcomes or the distribution of resources for residents of the District, particularly for Black residents and other residents of color ([source](#))

RACIAL INEQUITY

When race can be used to predict life outcomes, e.g., disproportionality in education (high school graduation rates), jobs (unemployment rate), criminal justice (arrest and incarceration rates), and other key economic and social indicators ([source](#))

REWRITE

According to law, the Comprehensive Plan is to be implemented over a 20 year cycle with the next rewrite scheduled to occur in 2026 ([source](#))

CODE OF THE DISTRICT OF COLUMBIA

TITLE 1. GOVERNMENT ORGANIZATION.
CHAPTER 3. SPECIFIED GOVERNMENTAL AUTHORITY.
SUBCHAPTER III-A. COMPREHENSIVE PLAN.
PART I. GENERAL.

§ 1–306.02. Mayor to submit proposed Land Use Element and map; submission of amendments to District elements of comprehensive plan; specifications; approval.

* * *

(f)(1) The Mayor shall transmit 2 generalized maps—a Future Land Use Map and a Generalized Policy Map—to the Council within 90 days of the effective date of the Comprehensive Plan Amendment Act of 2021, passed on 2nd reading on XXX, 2021 (Enrolled version of Bill 24-1) (“Act”).

(2) The maps transmitted under this section shall:

(A) Incorporate the map amendments enacted in sections 2(b) and (c) of the Act;

(B) Conform to the requirements of sections 223 through 226 of Chapter 200 (“the Framework Element”) of the Comprehensive Plan;

(C) Be printed at a scale of 1,500 feet to 1 inch;

(D) Use standardized colors for planning maps;

(E) Indicate generalized land use policies; and

(F) Include a street grid and any changes in format or design to improve the readability and understanding of the adopted policies.

(3)(A) The Council shall hold a public hearing to determine if the maps transmitted under this section conform to the requirements of paragraph 2 of this subsection. If the Council determines that a map transmitted under this section conforms as required, the Council shall approve the map by resolution.

(B) If the Council determines that a map transmitted under this section does not conform to the requirements of paragraph 2 of this section but requires corrections to conform, the Council shall approve the map by resolution, identifying the