

# The Committee of 100

on the Federal City



**Comments from the Committee of 100 on the Federal City  
to the Office of Racial Equity  
on  
*Meaningful Community Engagement Resource Guide (Draft)*  
November 12, 2021**

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Thank you for the opportunity to submit comments on the ORE *Meaningful Community Engagement Resource Guide*. As Mayor Bowser seeks to apply a racial equity lens to evaluate policy decisions and District programs, we support an honest appraisal, not only of historical harm but also of *current practices that perpetuate harm*. This requires fresh thinking and new tools for community engagement, improved skills of listening and responding, and enforceable mandates to achieve significant and measurable changes in planning and development that have created the racial inequities so evident in our city today.

We commend you for including the chart titled *Level of Public Impact* (p. 17) and urge you to place it earlier in the Guide. At the outset of community engagement there needs to be a shared understanding of what is possible: levels of engagement, government responsiveness to public input, and the methods by which government will reach and engage people. The extent to which government is willing to let the public determine outcomes must be understood by both parties early in the process. From the public's point of view, having a meaningful role in decision-making is the whole point of engagement.

We respectfully offer comments and recommendations to improve the Guide, particularly as it prepares agencies to foster more equitable physical development:

**#1: Name and discuss specific present-day policies and practices that continue to cause racial inequities.**

To demonstrate that the *ORE Guidelines* are not just business as usual, a basic first step requires an honest account of current planning and development assumptions, policies and practices that are contributing to racial inequities. A few that might be cited include:

- Perpetuating the trickle-down myth that creating more market-rate housing will result in lower housing costs for low-income residents;
- Failure of the Zoning Commission to require IZ when the size of Downtown was tripled in the zoning rewrite and redevelopment was widespread, resulting in disproportionate displacement of Black residents;
- Failure to spend Housing Production Trust Funds for extremely low-income housing as required by law; and
- Failure to translate draft Comprehensive Plan amendments into other languages as required by law, thus depriving many racial and ethnic groups of the opportunity to comment on its provisions.

## #2: Anchor racial equity in the adopted Comprehensive Plan.

One way to gain community credibility is to work in close consultation with Black and other BIPOC-led organizations to select 10+ Comp Plan policies and actions that, if fully implemented, will have the greatest impact on reducing racial inequities. Then hold agencies accountable for achieving specific results through agency and individual performance measures.

The Housing and Economic Development sections of the Plan contain many policies and actions that could directly benefit racial equity in DC. A few that might be considered are suggested below in **Attachment: Implement Comprehensive Plan Policies and Actions to Achieve Racial Equity**.

## #3: Create a guide that leads to measurable impacts and community benefits.

The current draft Guide is heavy on process, repeatedly using broad terms such as “stakeholder engagement,” and “meaningful community engagement” that have been used repeatedly and have not resulted in community satisfaction. We urge you to strengthen the Guide by spelling out specific methodologies for agencies to measure actual achievements so that those agencies are accountable for tangible results to achieve racial equity.

While the Guide points out that agencies should take into consideration that there may be obstacles (language, disability, digital divide) to reaching people, it must also provide guidance on how to compensate for and overcome those obstacles.

Similarly, the Guide provides no standards for recording public input, which is critical to any legitimate effort to let the public shape outcomes. For example, meeting notes are often summarized in generalized language that blurs specific points and eliminates all nuance in participants’ comments. This sets up a rationale for an outcome that is preordained in favor of the city’s position and feeds into community cynicism about the engagement process.

Further, the Guide as written can easily *let officials off the hook as it requires only that they ask questions, not that they be held accountable for applying new approaches to familiar problems for better end results*. Public officials need better training in how to identify current planning practices that are not working and adopt those that lead to better results.

Finally, the chart on page 18, *Community Engagement Methods*, lists many familiar ways of sharing information and consulting with groups, but it does not include helping people understand visually what proposed changes will look like in their communities. Words alone are not enough, and too often they leave people to speculate about how zoning and planning terms will translate into physical impacts in their neighborhoods. When visual simulation is used in paint stores to help people *see choices before making a choice*, it is astonishing that this is not a routine planning tool in DC to help communities *look at change before it occurs*. Please add visual simulation to your list of methods.

For more information or clarification of points raised here, you may contact:

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**ATTACHMENT:**  
**Implement Comprehensive Plan Policies and Actions to Achieve Racial Equity**

In close consultation with Black and other BIPOC-led organizations, select 10+ Comp Plan policies and actions that, if fully implemented, will have the greatest impact on reducing racial inequities. Then hold agencies accountable through agency performance measurements and personnel review for achieving specific results.

The Housing and Economic Development sections of the Plan contain many policies and actions that, if fully implemented, could directly benefit racial equity in DC. A few of these that might be considered are:

- ***Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas***  
Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods.
- ***Action H-1.2.E: Leveraging Inclusionary Zoning***  
Review and consider expansion of the Inclusionary Zoning program as needed to encourage additional affordable housing production throughout the District. Examine and propose greater IZ requirements when zoning actions permit greater density or change in use. Factors supporting a greater requirement may include high-cost areas, proximity to transit stations or high-capacity surface transit corridors, and when increases in density or use changes from production, distribution, and repair (PDR) to residential or mixed-use. Consider requirements that potentially leverage financial subsidies, such as tax-exempt bonds. 504.26
- ***Policy H-1.2.10: Redevelopment of Existing Subsidized and Naturally Occurring Affordable Housing*** - Prioritize, encourage, and incentivize build-first, one-for-one, on-site, and in-kind replacement of affordable units, including larger family-sized units. In addition, encourage and incentivize relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial a
- 504.28 ***Action H-1.2.G: Continuum of Housing***  
Conduct a periodic review, at least every four years, of private development and federal and local housing programs in conjunction with a needs assessment to ensure that programs target the applicable gaps in the supply of housing by unit and building type, location, and affordability and include racial equity evaluations. 504.28
- 703.27 ***Action ED-1.1.G: Monitor Opportunity Zones***  
Monitor effects of the federal Opportunity Zones incentive in DC's Qualified Opportunity Zones to ensure that these programs benefit communities and to identify and address adverse community impacts, particularly to communities of color. If significant impacts are identified, recommend program and policy changes to mitigate the impacts. 703.27.