



**BILL 24-0371**

**RACIAL EQUITY IMPACT ASSESSMENT  
WARD REDISTRICTING AMENDMENT  
ACT OF 2021**

**TO:** The Honorable Phil Mendelson, Chairman, Council of the District of Columbia  
**FROM:** Dr. Brian McClure, Director, Council Office of Racial Equity  
**DATE:** December 6, 2021

A handwritten signature in black ink, appearing to read "Dr. McClure", is positioned to the right of the "DATE:" field.

**COMMITTEE**

Committee of the Whole

**BILL SUMMARY**

Bill 24-0371 amends the Redistricting Procedure Act of 1981. The amendments in Bill 24-0371 change the ward boundaries of Wards 1, 2, 5, 6, 7, and 8 following the 2020 Census. These ward boundary changes will make sure that there are roughly the same number of DC residents living in each of the eight wards.

**CONCLUSION**

Bill 24-0371 will likely exacerbate racial inequity in the District of Columbia.

The Committee Print, the draft amended by the Subcommittee on Redistricting and the Committee of the Whole, and is under consideration by the Council, fails to propose new ward boundaries in the realities and lived experiences of the District's Black, Indigenous, and other residents of color. CORE found that the 2021 redistricting cycle and resulting map:

- Failed to do an independent study to support claims about the impact of new ward boundaries on voter dilution
- Excluded low income residents and Black residents in the feedback process
- Creates inefficient and unreliable measures for resource allocation in the District

CORE recognizes that the process leading to the map proposal heavily influenced the resulting map. For this reason, while we traditionally analyze the legislative text, we have reviewed both the process leading to the map and the legislative text itself.

---

## **GLOSSARY**

Like many government processes, redistricting has its own vocabulary (unfortunately!). While we do our best to explain (or avoid) government jargon within our Racial Equity Impact Assessments, we've included this glossary for reference.

Terms are not ordered alphabetically. Instead, terms are ordered so that a reader reading the glossary from top to bottom can understand how the terms interact with one another.

### **REDISTRICTING**

Redistricting is a process that takes place every ten years. It is when states see if districts—political boundaries that impact voting and elections—include a relatively equal number of residents. To understand if there are a relatively equal number of residents in each district, states reference the decennial Census.

[\(source\)](#)

### **DECENNIAL CENSUS (ALSO KNOWN AS THE CENSUS)**

The decennial Census is a population count that takes place every ten years in the United States. (Decennial means every ten years.) Without the count, we would not know how many residents our country has and where they live. The decennial Census traditionally takes place on April first every ten years (years that end in a zero). For example, the past few decennial Census population counts took place in 2000, 2010, and 2020.

[\(source\)](#)

### **GERRYMANDERING**

Gerrymandering is when government officials draw or change district boundaries so that a political party or racial group has more of a presence in a district. This gives that party or racial group an advantage in voting outcomes to achieve their desired political representation. [\(source\)](#)

### **WARD**

A ward is a city-level boundary that is used to create districts for residents to participate in voting and receive government representation. There are eight wards in the District of Columbia. These wards go through the process of redistricting every ten years so that there is a relatively equal number of residents in each of the eight wards. [\(source\)](#)

### **VOTING DISTRICT**

In the District of Columbia, each ward is a voting district. A voting district can describe the wide variety of small polling areas, such as election districts, precincts, or wards, that State and local governments create to run elections. Some places, including DC, also use groupings of these small areas to define their State and local legislative districts. [\(source\)](#)

The Council of the District of Columbia is made up of thirteen members—a representative elected from each of the eight wards and five members elected at-large, including the Chairman. “At-large” means they represent residents in all wards. [\(source\)](#) For example, only voters from Ward 5 can vote for the Ward 5 Councilmember.

### **ADVISORY NEIGHBORHOOD COMMISSION**

An Advisory Neighborhood Commission (or ANC) is a part of DC Government that considers policies and programs that impact neighborhoods. These commissions get feedback directly from residents and keep close relationships with residents in the neighborhoods they serve. ANCs may seek resident feedback on topics such as transportation, parking, licenses, zoning, development, police, emergency services, trash collection, and the District's annual budget. There are 37 ANCs in the District. [\(source\)](#)

**COMMUNITY OF INTEREST**

A community of interest is a neighborhood, community, or group of people who have common policy concerns and would benefit from staying together in a single district. A community of interest has neighbors who share something in common or who are unique when compared to other communities. Typically, a community of interest is defined by the local community members. Race, ethnicity, shared ancestry, shared history, shared language, and shared goals (like advocating for a local health clinic, repairs after a natural disaster, recognition of a cultural holiday, etc) can all define a community of interest. ([source](#))

**CENSUS TRACT**

A Census tract is a small area defined by the Census Bureau that allows it to share data, such as the number of residents in an area, with the public and other government entities. Relative to ward and ANC boundaries, Census tracts are much smaller. ([source](#))

**RACIAL EQUITY**

Racial equity is achieved when race will no longer predicts opportunities, outcomes, or the distribution of resources for Black, Indigenous, and other residents of color. ([source](#))

**RACIAL INEQUITY**

Racial inequity is 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](#))

## **BACKGROUND**

The 2020 decennial Census (the Census) showed that the District experienced growth at just over fourteen and a half percent since 2010.<sup>1</sup> Most of this growth was experienced in Ward 6, where there was a forty two percent population increase since 2010.<sup>2</sup> On the other hand, Wards 2, 7, and 8 experienced the least amount of population increase between 2010 and 2020. These wards each grew by less than seven percent.<sup>3</sup>

These overall trends highlight the voting districts that need their population sizes adjusted for the District’s 2020 redistricting process. Ultimately, each ward must have about the same number of residents within its borders. Additionally, each ward’s population size must be within five percent of the average population of the District.<sup>4</sup> The 2020 Census found that the average number of residents living in each ward should be 86,193. This number is from taking the total population—which is 689,545—and dividing it by eight since there are eight wards in DC. To account for possible variation in the number of residents living in each ward, new ward boundaries can have a population size that is five percent above or below 86,193 residents. So, each ward needs to have between 81,883 and 90,503 residents to ensure that each ward has about the same number of residents within its boundary.<sup>5</sup>

Due to its exponential growth, Ward 6 needs to decrease the number of residents living within the ward because the current ward boundary leads to 17,699 residents above the range for the District’s average population recommendation by ward. Wards 7 and 8 need to increase the number of residents within their ward boundaries. Ward 7 falls short of the range for the District’s average population recommendation by 5,628 residents and Ward 8 falls short of the range by 3,370 residents.<sup>6</sup>

## **WHAT IS REDISTRICTING?**

- **Redistricting is a process that takes place every ten years. It is when states see if districts’—political boundaries that impact voting and elections—include a relatively equal number of residents. To understand if there are a relatively equal number of residents in each district, states reference the decennial Census.**
- **The District has six guidelines that influenced the ward boundaries drawn in the map proposal for the 2021 redistricting process. These guidelines are either legally required or they are principles that the District aims to follow so that policies are based on consistent ward groupings and allow for consistent data collection over time.**

Redistricting is the rebalancing of the number of residents that live within each voting district. In DC this happens at the ward and Advisory Neighborhood Commission (ANC) level. Redistricting takes place every ten years to ensure that voting districts across the United States have a similar number of residents living within them. Over time, the number of residents in voting districts change, which can cause some voting districts to be larger than others. This lack of balance between a state or city’s voting districts can cause larger voting districts to weaken the voting power of their residents when compared to smaller voting districts. With a regular redistricting process, the goal is to ensure that voting districts are balanced so that every resident’s vote is represented during elections.

---

<sup>1</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

There are several guidelines that the District must follow and prioritize during the redistricting process. These guidelines are either legally required by the federal or DC government, or they are principles that the District follows to ensure that data collection about neighborhoods and communities remain consistent:

GUIDELINE	DESCRIPTION
<p><b>EQUAL REPRESENTATION</b></p>	<p>The primary goal of redistricting is to ensure that voting districts have about the same number of residents. The goal of this guideline is to ensure equal representation in voting. This aligns with the federal principle of “one person, one vote,” which all states should aim for to allow each resident’s vote to not be diluted through the redistricting process.</p>
<p><b>RACIALLY EQUITABLE</b></p>	<p>The District also requires voting boundaries, such as wards, to not weaken the voting power of “minority citizens.” This means that Black, Indigenous, and other residents of color in the District should not have their voting power weakened.</p>
<p><b>COMPACT AND CONTIGUOUS WARDS</b></p>	<p>The third guideline that the District aims to follow during the redistricting process is to make sure that ward boundaries allow for residents in a ward to be connected and equally close in distance to the center of the ward. This guideline is also concerned with ward boundaries aligning with prominent geographic or natural landmarks. By aligning ward boundaries with landmarks, residents can more easily have a sense of when they may be crossing from one ward to another.</p>
<p><b>KEEP COMMUNITIES OF INTEREST TOGETHER</b></p>	<p>As much as possible, the District aims to keep neighborhoods and communities together so that they are not split up across new ward boundaries. This allows neighborhoods to remain connected when interacting with the District’s legislative process.</p>
<p><b>KEEP CENSUS TRACTS TOGETHER</b></p>	<p>As much as possible, Census tracts should not be split up across new ward boundaries. This helps with data collection, or the gathering of information about Census tracts. This information is often used by local and federal organizations to understand the demographics of residents within a Census tract.</p>
<p><b>WARD CONTINUITY AND STABILITY</b></p>	<p>The last guideline that the District aims to following during redistricting is to avoid “unnecessary, radical change” to ward boundaries given the COVID-19 public health crisis.</p>

These guidelines are largely adapted from the [Subcommittee’s report](#).

## HOW DID WE GET HERE?

The 2021 redistricting cycle started in earnest in September 2021. This is because the timeline for the Ward Redistricting Amendment Act of 2021 was shifted due to the 2020 decennial Census data being available in September of 2021. Traditionally, the decennial Census data is available in March of the year following the population count. Since the data was released later than usual, the public hearing and legislative process was also delayed.

CORE’s analysis of Bill 24-0371 officially began following the Subcommittee’s markup in late November 2021. Below is a timeline illustrating the 2021 redistricting cycle to date.

DATE	EVENT
<b>August 12, 2021</b>	Initial Census data released
<b>September 16, 2021</b>	Official Census data released
<b>September 17, 2021</b>	Redistricting website launched, allowing residents to use Census data to create their own recommendations on redrawing ward and ANC boundaries
<b>September 29, 2021</b>	Subcommittee on Redistricting holds first public hearing on redistricting
<b>October 2021</b>	Subcommittee on Redistricting holds eight hearings on ward redistricting, one specific to each ward
<b>November 5, 2021</b>	Subcommittee on Redistricting holds final hearing on redistricting
<b>Mid-November 2021</b>	Subcommittee mark-up of the ward redistricting bill (meaning that the three members of the Subcommittee vote whether to send the bill to the Committee of the Whole)
<b>December 6, 2021</b>	Council Office of Racial Equity releases Racial Equity Impact Assessment
<b>December 7, 2021</b>	Council holds first vote on the ward redistricting bill
<b>December 21, 2021</b>	Council holds second vote on the ward redistricting bill
<b>December 2021</b>	Ward Task Forces start meeting to provide recommendations on Advisory Neighborhood Commissions redistricting
<b>December 31, 2021</b>	Ward redistricting deadline
<b>February 2022</b>	Ward Task Forces report out recommendations
<b>May 2022</b>	Subcommittee mark-up of the ANC redistricting bill
<b>June 2022</b>	Council votes on the ANC redistricting bill

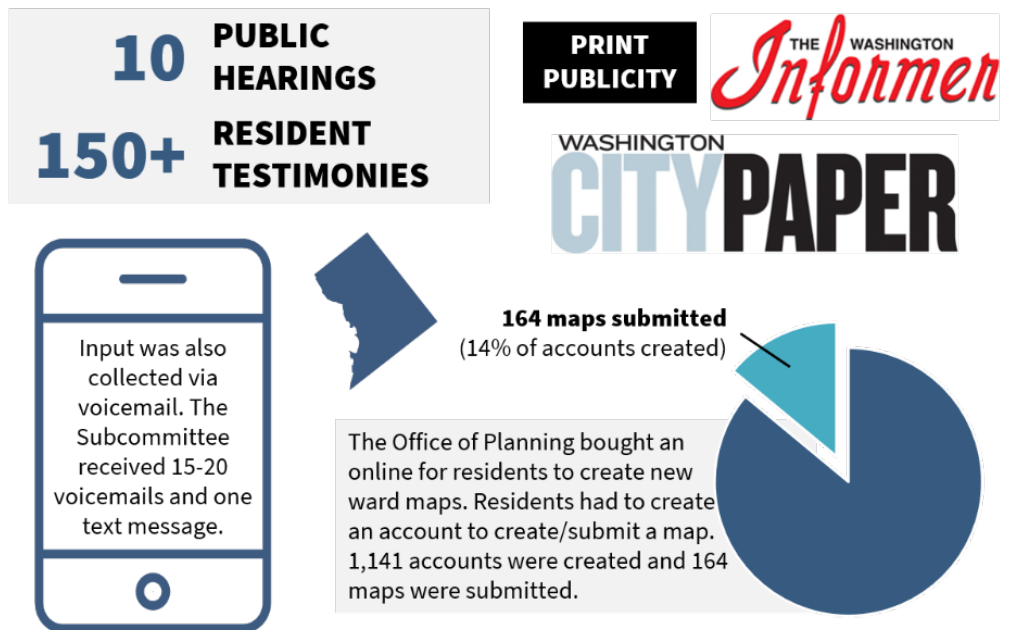
Timeline largely adapted from [Councilmember Silverman’s Redistricting webpage](#).

## WHAT WAS NEW IN THE 2021 REDISTRICTING CYCLE?

The process for the Ward Redistricting Amendment Act of 2021 has several changes to note when compared to the Ward Redistricting Amendment Acts of 2001 and 2011. These changes largely impacted the resident feedback process.

Given the COVID-19 Public Health Pandemic, the 2021 redistricting process included virtual public hearings for residents and DC government officials to participate in. It is also worth noting that the number of public hearings increased for the 2021 redistricting process. In the previous two redistricting years, the Council held one public hearing or roundtable prior to mark up of the respective bill for ward redistricting. This year, there were a total of ten public hearings for resident feedback. This is the first year that DC Council has provided an online tool for residents to create their own maps and submit them for review and consideration for new ward boundary lines.

Below, CORE summarizes the outcomes of the Council’s new approach to the redistricting resident feedback process.



Wards 6, 7, and 8 had to be redrawn because their populations were outside the allowed limits, so the Redistricting Subcommittee focused outreach efforts there. Here’s how:

WARD	PRINT ADVERTISEMENT IN	IN PERSON	DOOR TO DOOR
<b>6</b>	<i>HillRag</i>	Housing Fair at Eastern Market	<b>15,000 FLYERS DISTRIBUTED ACROSS ALL THREE WARDS</b>
<b>7</b>	<i>East of the River</i>	Held in partnership with Marshall Heights Development Association	
<b>8</b>	<i>East of the River</i>	Moved virtual due to weather	

## HOW DID CORE REVIEW REDISTRICTING?

This Racial Equity Impact Assessment (REIA) focuses on how the bill’s proposed changes will affect different racial and ethnic groups in the District. Because the work of ward redistricting is unique, CORE customized how we approached this assessment. The approach builds on our typical practices, but tailors to the Redistricting Subcommittee’s map proposal (also referred to as the Committee Print), the role of community engagement in redistricting changes, and the timing of our assessment.

### **Our analysis reviews both the Ward Redistricting Amendment Act of 2021 and the 2021 redistricting process.**

Surprisingly, the legislation for Bill 24-0371 is narrative text around street names. The map is in the form of a bill, meaning that it explains the new ward boundaries using directions and street names. For example, one part of the bill reads, “... thence in an easterly direction along said Spring Road, N.W., to New 23 Hampshire Avenue, N.W.; thence in a northeasterly direction along said New Hampshire 24 Avenue, N.W., to Rock Creek Church Road, N.W.” The Subcommittee provides a traditional map in its report.<sup>7</sup>

Because a racially equitable process is key to achieving racial equity, CORE is also analyzing the 2021 redistricting process. So, in addition to Bill 24-0371, this REIA references information from the Subcommittee on Redistricting’s (the Subcommittee) report and the process leading up to the subcommittee’s map proposal and related legal suggestions (like allowing State Board of Education candidates to run for board positions after being District residents for ninety days, instead of requiring candidates to have lived in their ward for a year).

### **Our analysis evaluates redistricting and the redistricting process using the “Groundwater Approach.”**

The [Groundwater Approach](#) is a metaphor created by the Racial Equity Institute.<sup>8</sup> This metaphor emphasizes that our society’s systems were created to disadvantage or completely exclude Black, Indigenous, and other people of color. This means that racial inequity is caused by systems, regardless of culture or people’s individual behavior—and that the experiences of Black, Indigenous, and other people of color are vastly different from the experiences of white people when interacting with the same systems.<sup>9</sup> Using the Groundwater Approach, a city in a housing crisis would not only 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 redistricting through a racial equity lens.**

CORE analyzed the proposed map and process leading to the proposal 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 questions in the table below.

---

<sup>7</sup> Councilmember Elissa Silverman. “[Report on B24-371. “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>8</sup> Racial Equity Institute. “[The Groundwater Approach](#).” Accessed December 6, 2021.

<sup>9</sup> 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.



RACIAL EQUITY ANGLE	POSSIBLE QUESTIONS
<b>EXPERIENCES OF EACH RACIAL AND ETHNIC POPULATION</b>	How does each racial and ethnic group currently fare given the outcome that redistricting aims to improve? Which racial and ethnic groups would be most affected by redistricting? Does redistricting address these differences? If so, does it consider each community differently or are groups incorrectly lumped together? How well does redistricting and its process account for the inequities faced by each racial and ethnic group?
<b>HISTORICAL LEGACIES OF RACISM AND RACIAL TRAUMA</b>	Why do different racial and ethnic groups fare differently when we consider the redistricting guidelines and other outcomes of interest? Which of these historical legacies continue to have affects today, either through the new map or through how the new ward boundaries policy might be perceived?
<b>RACIALLY EQUITABLE REPRESENTATION AND ENGAGEMENT</b>	Who does the current feedback system favor? Who was “at the table” when decisions were made? Who was at the table but did not have institutionally or socially recognized power to influence decisions? Who was at the table but not afforded the same power and space as others? Who wasn’t at the table but should have been? Who could have feasibly been there? Who was proactively invited? Whose lived experience was centered? Whose lived experiences were ignored? What advantages and disadvantages did different parties have “at the table” and how do those parties look from a racial and ethnic perspective?
<b>ASSESS DIFFERENT FORMS OF DISCRIMINATION</b>	What does the process for providing input on redistricting look like? In what ways is it inclusionary, in what ways is it exclusionary, and to whom? How are these processes being monitored for bias? Is the monitoring happening in real time or after the fact?
<b>DIFFERENCES IN OUTPUTS<sup>10</sup> FOR RACIAL AND ETHNIC GROUPS</b>	What are the outputs of interest for redistricting? Might the outputs be different across racial and ethnic groups? Why?
<b>DISPARATE RACIAL AND ETHNIC OUTCOMES</b>	What could be the impact of redistricting be 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).

These questions will guide our research and help us determine how the proposal for new ward boundaries will impact racial equity in the District

<sup>10</sup> An “output” is an easily measurable indicator related to a program or policy’s activities. An “outcome” is the goal or consequence of the program or policy. For example, the redistricting process would measure the number of people in each new ward as an *output* to better understand how the new ward boundaries affect the *outcome* of equal political power.

# SUMMARY OF RACIAL EQUITY IMPACT THEMES

Several recurring themes lead the Ward Redistricting Amendment Act of 2021 to exacerbate racial inequity in the District. We hope that these themes can be used as a resource by Councilmembers, staff, and the public in applying a racial equity lens to review the Committee Print. The five themes are listed below and are elaborated on over the following pages.

THEME	CORE ASSESSMENT
<b>RESIDENT PARTICIPATION</b> This bill should be built on resident feedback. To gather this feedback, there are several processes in place intended to enable resident participation.	While some of the subcommittee’s efforts are commendable, the reliance on online resources for resident participation in the 2021 redistricting cycle excludes residents without internet access from the feedback process.
<b>VOTING POWER</b> There are several legal principles that the Ward Redistricting Amendment Act of 2021 and the 2012 redistricting process should follow. These principles are intended to ensure: 1) that every resident’s vote counts during elections and 2) that the political power of Black, Indigenous, and other residents of color is not weakened or diluted due to new ward boundaries.	The District has not completed a voter dilution analysis leading up to the release of proposed ward boundaries. Without an independent analysis, the subcommittee cannot definitively claim whether voter dilution will occur because of the new ward boundaries. The lack of analysis has the potential to exacerbate racial inequity in the District.
<b>GROWTH IN THE DISTRICT</b> The reason for the redistricting cycle is to handle population changes that occur over time. Since the last redistricting in 2010, the District has experienced a growth rate of over fourteen and a half percent. <sup>11</sup> In DC, this movement takes place in the context of the District being in the top ten states for its growth rate. <sup>12</sup>	While ward boundaries do not legally impact how the District grows, they do impact how residents have input on development through political representation in the District. In some places, the proposed boundaries remove new developments from wards that are made up predominantly of Black residents. Where this occurs, the redistricting map proposal harms racial equity in the District.
<b>RESOURCE ALLOCATION</b> Ward boundaries are consistently used as a proxy for race when determining resource allocation. This is most often seen through program eligibility requirements and how the District monitors the economic wellbeing of residents.	The Committee Print does not require the District to revisit how its programs, policies, and monitoring of resident outcomes use location as a proxy for race in eligibility requirements and decision making. By not requiring this, the ward boundary changes in the Committee Print have the potential to harm Black, Indigenous, and other residents of color by misguiding resource allocation in the District.
<b>GOVERNMENT OPERATIONS</b> Ward boundaries will change because of the Ward Redistricting Amendment Act of 2021. These boundary changes have led residents to wonder how government resources and services may change because of new ward boundaries.	CORE assessed if parking permits, state board of education candidacy requirements, street improvement budgets, and police districts would be impacted by the proposed ward boundary changes. Given that these operations would not be impacted by ward boundary changes, CORE did not assess their impact on racial equity.

<sup>11</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>12</sup> The Census. “[Percent Change in Resident Population for the 50 States, the District of Columbia, and Puerto Rico: 2010 to 2020.](#)”

# RESIDENT PARTICIPATION

## ACTION

**The 2021 redistricting cycle primarily relied on online solutions to meaningfully inform residents and gather resident feedback on new ward boundaries.**



Due to the digital divide in the District, using online tools to explain redistricting and hear from residents about new ward boundaries excludes many Black residents from fully and meaningfully participating in redistricting. This is because about thirty four percent of Ward 7 residents<sup>13</sup> and about thirty two percent of Ward 8 residents<sup>14</sup> are without internet subscriptions.<sup>15</sup> These wards have about a ninety two percent<sup>16</sup> and eighty nine percent<sup>17</sup> Black population respectively.

## BEST PRACTICE

**A racially equitable resident participation process considers how all residents can give well-informed input and to what extent all residents were involved in the process.**



All residents must be enabled to meaningfully participate in the 2021 redistricting cycle, regardless of access to a computer, internet subscription, technical skills, and language spoken. A best practice is to review these with a racial equity lens before beginning the feedback process. This is so that any symptoms of racial equity that may prevent all Black, Indigenous, and other residents of color from giving well-informed input do not hinder resident participation.

## ILLUSTRATIVE EXAMPLE | THE ONLINE ESRI MAPPING TOOL

The Subcommittee for Redistricting worked with ESRI—the [Environmental Systems Research Institute](#)—to create a [mapping tool](#). This mapping tool allowed residents to create their own new ward maps and was one of the most direct ways residents could give specific feedback about new ward boundaries.

To help residents learn the tool, the Office of Planning (OP) created an hour-long online tutorial. The subcommittee also completed tutorials for groups of residents and organizations that emailed or called asking for help. Lastly, the subcommittee held in-person events in Wards 6 and 7 after the three discussion maps were released. The subcommittee also planned for Ward 8 to have an event in person, but the event was moved online due to bad weather. The subcommittee did not follow up with an additional in person event to complement the virtual meeting.

<sup>13</sup> DC Office of Planning. “[District of Columbia Profiles: Ward 7.](#)” Accessed December 2, 2021.

<sup>14</sup> DC Office of Planning. “[District of Columbia Profiles: Ward 8.](#)” Accessed December 2, 2021.

<sup>15</sup> TheDCLine.org. “[DC Faces Challenges in Trying to Overcome Digital Divide, Expand Internet Access.](#)” Accessed December 2, 2021.

<sup>16</sup> Census Reporter. “[Census Profile: Ward 7, DC.](#)” Accessed December 3, 2021.

<sup>17</sup> Census Reporter. “[Census Profile: Ward 8, DC.](#)” Accessed December 3, 2021.

CORE compliments the subcommittee for holding in person events and working with OP to provide online tutorials. However, the mapping tool is a platform that requires a computer, internet access, and technical skills beyond basic computer functions. Using this tool as the most direct way for residents to give feedback on exact ward boundaries is not racially equitable resident participation. It excludes residents without internet access. Additionally, the mapping tool is difficult to navigate on a mobile device, which may have excluded residents that do not have access to a desktop or laptop computer.

Despite the digital divide in the District primarily impacting residents in Wards 7 and 8, there was no alternative method for residents to submit maps with ward boundary suggestions. Of the 1,141 user accounts that were created for the mapping tool, only one hundred sixty four maps were submitted. These numbers indicate a disconnect in the process. Additionally, some residents submitted or verbally shared testimony expressing how difficult the mapping tool was to use.<sup>18</sup>

### ADDITIONAL EXAMPLE | THE REDISTRICTING WEBPAGE

The Subcommittee for Redistricting created [a webpage on Councilmember Silverman’s website](#) to share detailed information about redistricting with residents. This website includes:

- Expected timelines for the 2021 redistricting cycle
- Dates, notices, and recordings of public hearings
- How residents can participate in the redistricting process
- How redistricting may impact access to city services, such as leaf collection
- How residents can learn about their current ward and if their ward of residence will change
- Resources related to redistricting, such as datasets, maps of the District’s Census tracts, and information from previous redistricting cycles.

This webpage was residents’ main source of detailed information to understand what redistricting means for them. CORE is encouraged by the subcommittee’s efforts to have a single location for residents to get information to meaningfully participate in the 2021 redistricting cycle. CORE also recognizes the subcommittee’s flyers and ads targeted residents in Wards 6, 7, and 8. These print materials provided a heads up that redistricting is taking place, a link to the website, and phone numbers should they have any questions.

However, given the District’s digital divide is concentrated in Wards 7 and 8—the two wards that needed to increase the number of residents in their boundaries during this cycle—relying on the redistricting webpage was insufficient for a racially equitable resident participation process. Relying on a webpage to provide information that can influence a resident’s ability to understand and meaningfully participate in the 2021 redistricting cycle leaves out residents who are less likely to have access to a traditional computer and high-speed internet subscription. Wards 7 and 8 have about a ninety two percent<sup>19</sup> and eighty nine percent<sup>20</sup> Black population respectively and experience the largest digital divide in the District.<sup>21</sup> Likely, this means that Black residents without access to a computer and internet subscription were not well informed about what redistricting means for their ward boundaries that were required to change by law.

*These examples are meant to be illustrative of this Racial Equity Impact Assessments broader themes. As you review the map and redistricting process in ways that are most important to you, we hope our assessment can serve as a guide.*

<sup>18</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021

<sup>19</sup> Census Reporter. “[Census Profile: Ward 7, DC.](#)” Accessed December 3, 2021.

<sup>20</sup> Census Reporter. “[Census Profile: Ward 8, DC.](#)” Accessed December 3, 2021.

<sup>21</sup> TheDCLine.org. “[DC Faces Challenges in Trying to Overcome Digital Divide, Expand Internet Access.](#)” Accessed December 6, 2021.

# VOTING POWER

## ACTION

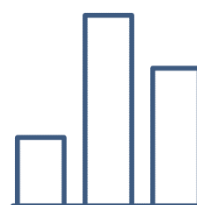
**The District has not completed a voter dilution analysis leading up to the release of proposed ward boundaries. Currently, the Committee Print relies on population size as a basis to claim that voter dilution would not take place because of new ward boundaries.**



While population size may be related to voter dilution, it is insufficient to allow population size to be the primary basis for claiming that a new ward boundary would definitively not lead to voter dilution.

## BEST PRACTICE

**When going through a redistricting cycle, a voter dilution analysis should be done before adopting a final redistricting plan.<sup>22</sup>**



A rigorous, data-driven approach to understanding possible voter dilution because of new ward boundaries is the most definitive way to ensure that new ward boundaries do not weaken the voting power of Black, Indigenous, and other residents of color.

## ILLUSTRATIVE EXAMPLE | NAVY YARD AND WARD 8

Current estimates around how voting power may be impacted by Navy Yard moving to Ward 8 are based in population size estimates instead of rigorous voter dilution analysis.<sup>23</sup>

To definitively understand voter dilution within a voting district, Council would need to analyze voting patterns by race and ethnicity.<sup>24</sup> This would entail mathematical modeling.<sup>25</sup> The goal of this analysis would be to see if new ward boundaries would allow Black, Indigenous, and other residents of color with enough voting power to elect their preferred candidates given the new ward boundaries.

*These examples are meant to be illustrative of this Racial Equity Impact Assessments broader themes. As you review the map and redistricting process in ways that are most important to you, we hope our assessment can serve as a guide.*

<sup>22</sup> Ibid.

<sup>23</sup> Councilmember Elissa Silverman. "[Report on B24-371, "Ward Redistricting Amendment Act of 2021"](#)" Subcommittee Report, November 19, 2021.

<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

# GROWTH IN THE DISTRICT

## ACTION

**Some of the proposed ward boundaries keep new developments in the same wards as neighborhoods and ANCs that predominantly consist of Black residents. Other ward boundaries are removing new developments from wards that predominantly consist of Black residents.**



While ward boundaries do not legally impact how the District grows, they do impact jurisdiction, which determines how residents provide input on development through political representation in the District. When neighborhoods that are predominantly Black and have been continuously divested from maintain jurisdiction over (re)developments, Black residents are given the ability to provide the most direct input on decisions.

## BEST PRACTICE

**Ensuring that the District's Black, Indigenous, and other residents of color are given jurisdiction of development projects that have been in their communities for years is a starting point for achieving racially equitable development and growth in the District.**



CORE believes that the Government Alliance for Racial Equity (GARE) said it best: “When we achieve equitable development, we increase the capacity of people of color to strengthen their communities and determine their own future and that of their neighborhoods.”<sup>26</sup> If Black, Indigenous, and other residents of color are not meaningfully given the platform to give direct impact on developments, then racially equitable development and growth cannot occur.

## ILLUSTRATIVE EXAMPLE | RESERVATION 13

Reservation 13 is known as “one of the East Coast’s largest undeveloped parcels of public land.”<sup>27</sup> It was formally home to DC General Hospital, which was demolished in 2020.<sup>28</sup> By keeping Reservation 13 in Ward 7, residents in Ward 7 will have the ability to provide more direct input on the Reservation 13 development plans. This is a positive decision, especially because Ward 7 residents have been waiting for years to have this ability.<sup>29</sup>

While all residents are welcome to provide input on development plans, having a development under a ward’s jurisdiction ensures that the concerns of residents in that ward are prioritized. Having a new

<sup>26</sup> GARE. “[Equitable Development as a Tool to Advance Racial Equity.](#)”

<sup>27</sup> Washington Post. “[D.C. Chooses Development Plan for Reservation 13.](#)” Accessed December 2, 2021.

<sup>28</sup> DCist. “[Here Are D.C.’s Plans For Reservation 13 Site.](#)” Accessed December 3, 2021.

<sup>29</sup> Ibid.

development in a ward of residence also ensures that residents are more consistently updated about changes in development plans and opportunities to provide further input, especially at the ANC level.

### ADDITIONAL EXAMPLE | ARMED FORCES RETIREMENT HOME

The Armed Forces Retirement Home (AFRH) is a two hundred and seventy two acre property.<sup>30</sup> There have been plans for the redevelopment of this for many years. It is now receiving 4.9 million square feet of development for residential homes, condos, retail space, office space, and medical space.<sup>31</sup> By moving the Armed Forces Retirement Home and its corresponding redevelopment from Ward 5 to Ward 1, the subcommittee suggests that the development will be aligned with a minority community.<sup>32</sup> This is because Ward 1's Park View neighborhood, which has the largest Black population than other neighborhoods surrounding AFRH, is aligned with a neighboring ANC in Ward 1.<sup>33</sup>

It is worth noting that the AFRH has been in Ward 5 since 2002—the same year that the federal government agreed to lease some of the property's land to cover operation costs for the home.<sup>34</sup> Now, with redevelopment plans finally in place, Ward 5 residents will have less opportunities to provide direct input on these plans. At the ward level, Ward 5 has more residents of color than Ward 1.<sup>35</sup> While CORE recognizes that the Park View neighborhood is predominantly made up of Black residents, removing Ward 5's jurisdiction over the redevelopment is harmful. This is because moving the AFRH out of Ward 5 removes those residents' ability to have direct input on a property that has been in their ward for years.

*These examples are meant to be illustrative of this Racial Equity Impact Assessments broader themes. As you review the map and redistricting process in ways that are most important to you, we hope our assessment can serve as a guide.*

---

<sup>30</sup> Armed Forces Retirement Home. "[Master Plan, August 2008.](#)"

<sup>31</sup> Armed Forces Retirement Home. "[Madison Marquette | Urban Atlantic Selected for Development at Armed Forces Retirement Home.](#)"

<sup>32</sup> Councilmember Elissa Silverman. "[Report on B24-371, "Ward Redistricting Amendment Act of 2021"](#)" Subcommittee Report, November 19, 2021.

<sup>33</sup> Ibid.

<sup>34</sup> Alpert, David. "[Will Development at the Armed Forces Retirement Home Mesh with the City, or Be Another Planning Disaster?](#)" Accessed December 6, 2021.

<sup>35</sup> Ibid.

# RESOURCE ALLOCATION

## ACTION

**The Committee Print does not require the District to revisit how its programs, policies, and monitoring of resident quality of life all use location as a proxy for race in eligibility requirements and decision making.**



Ward boundaries are consistently used as a proxy for race when determining resource allocation. This is most often seen through program eligibility requirements and the District's understanding of its residents' economic wellbeing. As ward boundaries change, ward can no longer be used as an honest proxy for race when implementing policies and programs that are intended to eliminate symptoms of racial inequity in the District.

## BEST PRACTICE

**To ensure a racially equitable resource allocation throughout the District, race and ethnicity are the most precise measures for programs and policies to consider.**



By using race and ethnicity in programs, policies, and initiatives that are intended to eliminate symptoms of racial inequity, the District would ensure that resources reach the residents that they are intended to. This allows programs and policies to remain more stable to things like the redistricting process, which takes place every ten years.

### ILLUSTRATIVE EXAMPLE | ACCESS TO GROCERY STORES IN WARD 8

The subcommittee's proposed new ward boundaries include moving Navy Yard from Ward 6 to Ward 8. Throughout the public hearings for Wards 6 and 8, several residents explained that moving a part of Ward 6 into Ward 8 would improve Ward 8's economic prosperity.<sup>36</sup> The subcommittee shared these sentiments as well in its report.<sup>37</sup> While this proposal would mean that the economic activity of Navy Yard would become a part of Ward 8, it is important to note that the Black residents and low income residents of Ward 8 would continue to face racial disparities in wellbeing, economic outcomes, and access to resources.

For example, while there is only one full service grocery store in Ward 8, there are fourteen full service grocery stores in Ward 6 alone.<sup>38</sup> Navy Yard has at least two full service grocery stores, including Harris Teeter and Whole Foods. On paper, moving Navy Yard would more than double the current number of grocery stores in Ward 8 from one to three.<sup>39</sup> In reality, however, the two additional grocery stores would

<sup>36</sup> Councilmember Elissa Silverman. "[Report on B24-371, "Ward Redistricting Amendment Act of 2021"](#)" Subcommittee Report, November 19, 2021.

<sup>37</sup> Ibid.

<sup>38</sup> DC Hunger Solutions. Ending hunger in the nation's capital, "[Still Minding the Grocery Gap in DC, 10th Anniversary Grocery Store Report.](#)" January 2021.

<sup>39</sup> The only full service grocery store in Ward 8 is the Giant on Alabama Avenue. By full service grocery store, CORE is referring to a grocery store that sells at least six of the following categories of food: fresh fruits and vegetables, fresh and uncooked meats, poultry,



still remain across the Anacostia bridge and remain inaccessible to most of Ward 8’s Black residents and low income residents.

To truly ensure that Ward 8 experiences economic prosperity, the ward’s Black residents and low income residents need to be meaningfully engaged in decisions leading up to, during, and after new developments being put in place throughout the ward.

### **ADDITIONAL EXAMPLE | PROGRAM ELIGIBILITY REQUIREMENTS**

A significant number of existing District government programs that intended to help Black residents and residents who are low income include strict residency requirements that grantees live or serve residents in Wards 7 and 8.

For example, in October 2020, the Mayor launched the Families First Success Center in Wards 7 and 8. This initiative opened ten family success centers across Wards 7 and 8 with hopes of connecting families to prevention services ranging from employment, education, food security, childcare, to mental health services.<sup>40</sup>

Other initiatives such as the Fiscal Year 2022 Food Access Fund Grant and the DC East of the River Small Business Economic Relief Microgrant Program for Wards 7 and 8 were designed to address disparities in food access, employment, and to provide small business owners with access to financial capital. All of these programs require grantees to be residents of Wards 7 and 8 or to commit to opening locations in Wards 7 or 8.<sup>41</sup> With the changes proposed in the 2021 redistricting cycle, it is likely that white and affluent residents would also qualify for the same programs intended for Black residents and low income residents in Wards 7 or 8.

*These examples are meant to be illustrative of this Racial Equity Impact Assessments broader themes. As you review the map and redistricting process in ways that are most important to you, we hope our assessment can serve as a guide.*

---

and seafood, dairy products, canned foods, frozen foods, dry groceries and baked goods, and nonalcoholic beverages. This definition is established by the District's Alcoholic Beverage Regulation Administration.

<sup>40</sup> DC Government, Child and Family Services Agency, [“Mayor Bowser Launches Families First Success Centers in Wards 7 and 8.”](#) October 7, 2020.

<sup>41</sup> Office of the Deputy Mayor for Planning and Economic Development Notice of Funding Availability, [FY22 Food Access Fund Grant, Request for Application](#); also see the [DC East of the River Small Business Economic Relief Microgrant Program for Wards 7 and 8](#).

# GOVERNMENT OPERATIONS

Residents asked how the 2021 redistricting cycle may affect the District’s government operations. Below, CORE assessed if parking permits, state board of education candidacy requirements, street improvement budgets, and police districts would be impacted by the proposed ward boundary changes. Then, CORE explains how the effect of possible changes impact racial equity, if at all.

## PARKING PERMITS

Parking zones in the District are used to determine residential parking permits. These parking zones and residential parking permits are tied to ward boundaries. This means that each redistricting cycle, residential parking permits and parking zones change.<sup>42</sup>

The Subcommittee Print suggests that the Committee of the Whole change the current parking zone regulations so that the current parking zones are frozen and do not change with the 2021 redistricting cycle.<sup>43</sup> This means that the residential permits which are currently based on a resident’s ward would not change through this redistricting cycle.<sup>44</sup> However, this relies on the Committee of the Whole approving this suggestion. For this reason, CORE has not considered the effect of the subcommittee’s suggestion as a part of this racial equity impact assessment on redistricting.

## STATE BOARD OF EDUCATION CANDIDACY

The [DC State Board of Education](#) (SBOE) is an independent agency with a nine member board. Currently, school board candidates must live in their ward of residence for a year before they can run to join the board for SBOE.<sup>45</sup> Generally, residency requirements are common for school board positions and elections across the US.

In DC, the SBOE is responsible for setting broad policy for graduation requirements, academic standards, and teacher qualifications. The Board is also responsible for advising the Office of the State Superintendent of Education (OSSE).<sup>46</sup>

The Subcommittee Print suggests that the Committee of the Whole change the current SBOE residency requirements so that those running for representation need to live in the District for ninety days before an election.<sup>47</sup> However, this relies on the Committee of the Whole approving this suggestion.

For this reason, CORE has not considered the effect of the subcommittee’s suggestion as a part of this racial equity impact assessment on redistricting.

<sup>42</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>43</sup> DC Official Code. “§ 1-1001.08. [Qualifications of Candidates and Electors; Nomination and Election of Delegate, Chairman of the Council, Members of Council, Mayor, Attorney General, and Members of State Board of Education; Petition Requirements; Arrangement of Ballot.](#) | D.C. Law Library.” Accessed December 5, 2021.

<sup>44</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>45</sup> DC Official Code. “§ 1-1001.08. [Qualifications of Candidates and Electors; Nomination and Election of Delegate, Chairman of the Council, Members of Council, Mayor, Attorney General, and Members of State Board of Education; Petition Requirements; Arrangement of Ballot.](#) | D.C. Law Library.” Accessed December 5, 2021.

<sup>46</sup> Wexler, Natalie. “[DC Isn’t a State, so Why Does It Have a State Board of Education?](#)” Accessed December 3, 2021.

<sup>47</sup> DC Official Code. “§ 1-1001.08. [Qualifications of Candidates and Electors; Nomination and Election of Delegate, Chairman of the Council, Members of Council, Mayor, Attorney General, and Members of State Board of Education; Petition Requirements; Arrangement of Ballot.](#) | D.C. Law Library.” Accessed December 5, 2021.

## STREET MAINTENANCE

Leading up to the current ward boundary proposals, the subcommittee found that street maintenance is one area where District funds are assigned by ward.<sup>48</sup> Within the capital budget—that is the budget that is set aside by the District for major projects—each ward is allocated approximately \$74 million for transportation investments.<sup>49</sup> The line items within the transportation investments can vary by ward, however street paving is consistently set at \$25 million budget per ward.

Given that the budget is reviewed on an annual basis, and that street paving budgets are consistent across wards, CORE has not considered the effect of the subcommittee’s suggestion as a part of this racial equity impact assessment on redistricting.

## POLICE DISTRICTS

Residents asked how redistricting might affect police presence and operations. These are largely separate processes. For context, the Metropolitan Police Department (MPD) organizes its staff across seven police districts, which are further broken into Police Service Areas.<sup>50</sup> According to WAMU, “[police district and PSA] maps are redrawn on a different schedule that isn’t tied to the redistricting process.”<sup>51</sup> MPD’s latest maps launched in January 2019, based on “current workload, anticipated population growth, economic development, and community needs.”<sup>52</sup>

To assist their thought process for changes to the Ward 7 boundary, the Subcommittee referenced other public service boundaries—including school boundaries, ANC jurisdictions, city planning maps, tax assessment neighborhoods, and police districts.<sup>53</sup> However, MPD staffing would only be affected if things were the other way around, and police district boundaries drew from these new ward boundaries.

For this reason, CORE has not considered the effect on police presence as part of this racial equity impact assessment on redistricting.

*These examples are meant to be illustrative of this Racial Equity Impact Assessments broader themes. As you review the map and redistricting process in ways that are most important to you, we hope our assessment can serve as a guide.*

---

<sup>48</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

<sup>49</sup> Ibid.

<sup>50</sup> MPDC. “[Police Districts and Police Service Areas.](#)”

<sup>51</sup> Austermuhle, Martin. “[The War Of The Wards: D.C. Redistricting, Explained.](#)” WAMU, November 10, 2021.

<sup>52</sup> MPDC. “[Police Boundary Update.](#)”

<sup>53</sup> Councilmember Elissa Silverman. “[Report on B24-371, “Ward Redistricting Amendment Act of 2021”](#)” Subcommittee Report, November 19, 2021.

## **CONCLUSION**

The Committee Print, the draft amended by the Subcommittee on Redistricting and the Committee of the Whole, and is under consideration by the Council, fails to propose new ward boundaries in the realities and lived experiences of the District's Black, Indigenous, and other residents of color.

## **LIMITATIONS**

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

**The 2020 Census population count for the District is lower than what the District had estimated prior to the release of the 2020 Census data in September 2021.** While variations in population estimates are possible, there is evidence from various sources that suggest the District's population was undercounted. The Office of Planning (OP) testified about this and shared that it plans to appeal the District's population count.<sup>54</sup> However, this process is estimated to take two years to complete and the federal deadline for DC to complete ward redistricting is December 31, 2021 by law. Whether or not the District's population was undercounted in the 2020 Census, the redistricting process must move forward with the population numbers that were released in September 2021.

When undercounting takes place in the Census, racial equity impacts can take place across a variety of areas. Undercounting most consistently occurs for residents that are "Black American Indians and Alaska Natives, Asian and Pacific Islanders, and Hispanic/Latinx people".<sup>55</sup>

**Assessing legislation's potential racial equity impacts is a rigorous, analytical, and uncertain undertaking.** Assessing policy for racial equity is a rigorous and organized exercise but also one with constraints. It is 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. Our assessment is our most educated and critical hypothesis of the bill's racial equity impacts.

**This assessment intends to inform the public, Councilmembers, and Council staff about the legislation through a racial equity lens.** As a reminder, a REIA is not binding. Regardless of the Council Office of Racial Equity's final assessment, the legislation can still pass.

**This assessment aims to be accurate and useful, but omissions may exist.** Given the density of racial equity issues, it is unlikely that we will raise all relevant racial equity issues present in a bill. In addition, an omission from our assessment should not: 1) be interpreted as a provision having no racial equity impact or 2) invalidate another party's racial equity concern.

---

<sup>54</sup> Councilmember Elissa Silverman. "[Report on B24-371, "Ward Redistricting Amendment Act of 2021"](#)" Subcommittee Report, November 19, 2021.

<sup>55</sup> The Urban Institute. "[The 2020 Census and the Consequences of Miscounts for Fair Outcomes: District of Columbia \(DC\)](#)". November 2021.