December 8, 2022

Mayor Bowser,

Thank you for the opportunity to provide feedback on the District’s first-ever Racial Equity Action Plan (REAP) draft. DC Greens is a District-based non-profit that promotes health equity through the cultivation of a just and resilient food system, amplification of marginalized voices, and responsiveness to community needs. Given that Black and brown communities disproportionately experience poverty in the District (in 2020, 27% of Black residents and 22 percent of Hispanic residents lived below the poverty line vs just 6% of white residents) and DC’s Black residents are the primary users of critical food assistance programs like SNAP (in 2018, 85% of households receiving SNAP were Black), DC Greens believes that the REAP is a vital tool in our collective efforts as a community to achieve food justice and health equity.

Overall, we believe that the REAP draft is a solid start to a District-wide focus on racial equity. We are appreciative of the Administration’s efforts to engage community members and a diversity of government leaders throughout the development of the draft report, and hope that engagement will only expand as the work continues. We are particularly in alignment on the seven key themes/areas ripe for racial equity work identified in the report: housing; economic opportunity; health; safety; education; neighborhood life; civic engagement.

The selection of these seven themes gives the District a solid foundation on which to build programs, outreach, and change-making efforts to advance racial equity. DC Greens also appreciates the provision of a clear roadmap of work and identification of performance indicators and responsible partners in the REAP’s “Action Charts”.

While we are glad to see this much-needed work getting underway, we have also identified some areas of concern. Whereas the REAP themes feel appropriately targeted to the District’s most pressing areas of need, the four goals of the REAP – DC government staff understand and are committed to achieving racial equity; DC government is committed to eliminating racial and ethnic inequities; DC government is committed to meaningfully engaging community in government decision-making processes and strengthening community partnerships; DC government is an equitable employer and engages in racially equitable hiring, promotion, and retention practices – are academic in scope and lacking real connection to the ongoing state of racial inequity (including that perpetuated by local government) in the District.

While we acknowledge that process steps like defining a shared vocabulary, setting evaluation metrics, and data collection are an important part of this work, we also believe that any serious attempt at addressing racial inequities must go far beyond good-on-paper processes. Missing from the REAP’s outlined goals, for example, is a commitment to conduct and immediately act upon an assessment of complaints already filed with or against DC officials, leadership, and agencies. This type of baseline assessment would provide important historical context and the
ability to quickly act upon known and outstanding issues. Data could pull from public testimonies, prior District or NGO-led engagements or feedback sessions, and legal suits filed against the District, among other places. The District already has years of data upon which it can, and should, act while the REAP is developed. DC Greens recommends that the Administration include in its “districtwide community landscape analysis (Goal 3: Indicator 2) an evaluation of the last five years of racial equity complaints filed by individuals and/or organizations against the District or any of its agencies (e.g., MPD, DOH, DCHA), as well as similar findings from public hearings or other fora.

Prior to the publication of the REAP draft, the Administration conducted a series of outreach meetings to engage community members. As fellow community servants, DC Greens appreciate the offering of both in-person and virtual meetings, as well as the publication of relevant materials in multiple languages. It is notable, however, that a majority of the in-person meetings were held in Northwest communities, while only one was held in Southwest and two in Southeast. Library drop-box locations for delivering comments are also predominantly located in NW. Lastly, the REAP draft is unclear on how community members will be engaged going forward and who will be their primary contact for questions, coordination, etc. DC Greens recommends prioritizing the development and publication of a community engagement schedule early in 2023. Additionally, we recommend the development of a responsive community engagement method (email address, website, etc.) through which the public can submit comments and questions, as well as the identification of a lead point person or persons and dissemination of their contact information.

Finally, we urge the Administration to include clear steps for non-compliance in future REAP materials. There is no progress on racial equity without accountability. DC Greens recommends the Administration identify and publish clear accountability measures for agencies or leaders who fail to comply with the REAP and/or fall short of goals or deadlines. We do not seek punitive measures for the sake of blaming and shaming, but rather, accountability measures that will identify and help clear roadblocks on our collective path forward. Because accountability relies not just on both internal and external oversight, DC Greens also recommends that the Administration develop centralized, visible, and responsive channels through which residents can report racial equity complaints/feedback and that said reports/feedback be used to inform future iterations of the REAP.

Thank you for taking the time to review these comments and for leading the District in this critical work. Please consider DC Greens a partner and ally as the REAP moves forward. We look forward to working together toward the realization of racial equity in the District.

Respectfully on behalf of the DC Greens Team,

Reana Kovalcik
Policy Director