

Equity Action Plan

April 14, 2022

Executive Summary

The National Capital Planning Commission (NCPC) is the federal government's central planning agency for the National Capital Region (NCR), which includes Washington, DC and adjoining jurisdictions in Virginia and Maryland. Through planning, policymaking, and project review, NCPC protects and advances the federal government's interest in the region's development. The Commission provides overall planning guidance for federal land and buildings in the region by reviewing the design of federal and certain local projects and federal master plans, overseeing long-range planning for future federal development, and monitoring capital investment by federal agencies.

NCPC is committed to making the advancement of equity a central component of the agency's decision-making framework. This plan presents five action items and outlines the agency's efforts to track progress and maintain accountability. The actions summarized below, which will take place in the short term, will inform future agency work to address and incorporate equity considerations.

Action Item #1 - Commemoration

Washington's commemorative landscape is marked by a lack of equitable representation in memorials, limited supply of available sites adjacent to the National Mall, and limited opportunities for members of underrepresented communities to participate in the commemorative process. NCPC has launched a pilot project to broaden subject matter representation and elevate underrepresented stories through a series of temporary commemorative works and broad national and community outreach.

Action Item #2 – Comprehensive Plan for the National Capital

While this policy document serves as the blueprint for the region's long-term development, it does not include targeted policies and analysis on how the plan impacts underserved communities and could improve more equitable outcomes. NCPC will develop a comprehensive framework and guiding principles to address equity across the plan, guide subsequent updates, and inform agency review and planning initiatives.

Action Item #3 – Federal Capital Improvements Program

NCPC annually reviews and recommends a six-year program of federal capital improvement projects for the NCR; however, it does not explicitly consider how the proposed projects may create or reduce equity disparities. To address this barrier, the agency will incorporate equity-related questions in the solicitation process used to request capital project submissions for NCPC review to identify potential impacts and provide early guidance on federal funding and location choices.

Action Item #4 – Review of Master Plans and Significant Projects

One of NCPC's primary functions is to review master plans and projects submitted by federal agency applicants for consistency with the Comprehensive Plan. NCPC will develop equity-related resources and tools to help applicants identify equity issues and amend its Submission Guidelines to encourage applicants to conduct public outreach earlier in the development of their projects and better include underserved communities.

Action Item #5 – Public Engagement with Commission Meetings

NCPC's outreach activities do not regularly target or reach underserved communities. To encourage greater familiarity and participation in Commission meetings and all agency activities, NCPC will expand its distribution lists, hold individual or small group meet-and-greets with underrepresented community members, and offer more accessible meeting formats and materials.

Summary of Early Accomplishments

Since the release of Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, NCPC has accomplished the following:

- Executive Director Marcel Acosta signed "Planning and Equity: A Commitment to Change," a statement in which national planning directors pledged to correct past harms and create a more inclusive future.
- Formed a cross-divisional working group to develop the Equity Action Plan.
- Briefed the Commission on Executive Order 13985 and efforts to prepare the Equity Action Plan.
- Coordinated NCPC's work on Executive Order 13985 with the agency's response to Executive Order 14035:
 Diversity, Equity, Inclusion, and Accessibility in Federal Workforce across its human resources and procurement activities.
- In coordination with the Office of Management and Budget, developed questions regarding the potential equity impacts for agencies submitting proposed federal capital improvement projects to NCPC for review for use in FY 2022.
- Partnered with the Trust for the National Mall and National Park Service to implement the Beyond Granite project, which seeks to expand the diversity of narratives in the capital's commemorative landscape and provide greater equity and inclusion in the commemoration process. The project was awarded a grant from The Andrew W. Mellon Foundation in October 2021.
- Initiated the process to retain equity consultants to train staff and the Commission on equity issues and how to make equity considerations a central component of the agency's decision-making framework.

Equity Action Plan

Action Item #1 – Commemoration

A. Barrier to Equitable Outcome(s)

Over the past decade, NCPC has worked on several plans and initiatives related to memorials and monuments that provide a comprehensive picture of Washington's commemorative landscape and highlight barriers to equity in the representation of commemorative works. Commemorative works focused on women, African Americans, Native Americans, Asian Americans, Hispanic and Latino Americans, members of the LGBTQ+ communities, as well as the many other identities, backgrounds, abilities, cultures, and beliefs of the American people, are vastly underrepresented in the national capital landscape. The 2021 National Monument Audit, funded by The Andrew W. Mellon Foundation, examined 50,000 U.S. monuments and found that of the 50 individuals represented most frequently, 88% are white, 6% are women, 10% are Black or Indigenous, and none honor Asian Americans, Hispanic and Latino Americans, or self-identified members of the LGBTQ+ communities. NCPC's 2012 Memorial Trends & Practice in Washington, DC report also acknowledged that there is an imbalance towards military and war-themed memorials in the capital. As of 2019, 63% of Washington's memorials emphasize themes related to military, statesmanship, or the nation's founding, which prominently feature white men. There are also issues with the process to construct permanent memorials in the nation's capital, which is complex, time-consuming, costly, and a barrier for entry for many underrepresented communities. In addition, there is a limited supply of available sites adjacent to the National Mall, and a widespread perception that proximity to the Mall elevates the importance of the subject being commemorated.

B. Action and Intended Impact on Barrier

NCPC partnered with the Trust for the National Mall (Trust) and the National Park Service (NPS) on the Beyond Granite project to explore various ways to expand subject matter representation and narratives through temporary commemoration that advances racial equity and support for underserved communities. The pilot project, which was recently awarded a multimillion-dollar grant from The Andrew W. Mellon Foundation, will bring a series of 8-10 temporary commemorative installations on and around the National Mall and in Washington, DC neighborhoods. It will also feature a broad outreach strategy that includes members of underserved communities, as well as federal and local officials, curators, artists, architects, and scholars in the selection of works.

Along with driving a local and national conversation around equitable commemoration narratives through this initiative, NCPC will use the outcomes of this effort to inform relevant updates to NCPC documents used in the agency's formal review of proposed commemorative works, including the *Memorials and Museums Master Plan* (2M Plan) and policies in the Visitor and Commemoration Element in the *Comprehensive Plan for the National Capital* (Comprehensive Plan). In addition to meeting the outreach requirements for formal rulemaking to amend the Comprehensive Plan, NCPC will also provide substantial informal outreach, particularly to underserved communities.

C. Tracking Progress

The Beyond Granite project will be conducted between October 2021-December 2023. Short-term success will be measured by the depth and breadth of public engagement and dialogue regarding the commemorative works, as well as the extent to which those participating in the project include diverse and underrepresented perspectives. The project will also identify specific opportunities to develop and/or change permitting and requirements to encourage temporary commemoration in the nation's capital that expands the diversity of narratives and reduces barriers for participation for underserved communities. Additionally, the 2M Plan will be updated in FY 2022/FY 2023 and will inform the Comprehensive Plan's Visitors & Commemoration Element update in FY 2023.

Long-term success would be to develop a federal policy framework for future temporary commemorative works and identify criteria for permanent locations and long-term programming of temporary memorials. Other long-term goals would be to provide a model structure for a temporary commemorative program that can be replicated in other cities; create a broader and more inclusive narrative of permanent and temporary commemorative works in the nation; find opportunities to remove barriers of access to permanent commemoration within the existing process; and develop educational materials for Congress, who ultimately determines who and what is represented in the national commemorative landscape.

D. Accountability

NCPC partnered with the Trust and NPS to complete the Beyond Granite project. NCPC staff is responsible for carrying out the 2M Plan and Visitors & Commemoration Element updates, which have been included in the agency's work plan. The equity action items identified for NCPC's commemoration work are consistent with NCPC's Strategic Plan core values for inclusiveness. They will also advance the strategic goals to address existing and emerging planning issues and respond to the unique issues of a national capital. NCPC will provide updates on the progress of these actions in the yearly fiscal performance reports and in periodic updates to the Commission.

Action Item #2 - Comprehensive Plan for the National Capital

A. Barrier to Equitable Outcome(s)

NCPC prepares and updates the Comprehensive Plan's Federal Elements, a policy document that consists of principles, goals, and planning policies that inform the growth and development of the NCR during the next 20 years. The Comprehensive Plan, by itself, does not compel action by the federal government; however, it is used by the Commission as a decision-making framework to guide its review of federal master plans and projects and capital improvements.

The current Comprehensive Plan was developed with an understanding of regional inequalities in income, wealth, and access to opportunities. This includes references to mapped Equity Emphasis Areas developed by the Metropolitan Washington Council of Government (MWCOG) to identify areas with concentrations of minority households and/or poverty. While the eastern half of the region has more areas of inequality and less access to opportunity, all communities in the region have areas of inequality. The Comprehensive Plan is regularly updated with data from federal and regional sources; however, NCPC does not independently develop many data sets or typically disaggregate data by race, income, and other factors to examine potential inequities.

The Comprehensive Plan accommodates federal and national activities in the region, plans for sustainable growth and development, and supports local and regional planning and development objectives. However, it lacks targeted policies, actions, and investments to improve outcomes for people of color, members of the LGBTQ+ communities, people with disabilities, and those adversely affected by persistent poverty or inequality. It also lacks analysis of direct and indirect impacts to these groups. In 2021, the Greater Washington Partnership reported that 13.6% of Black residents and 10.9% of Hispanic residents in the region live in poverty, compared to 4.9% of white residents. There's a \$156,000 gap in median home value between Black and white residents, and Black residents are nearly two times as likely to have housing costs that represent 30% or more of household income. Black and Hispanic residents also experience racial health disparities, driven by lower income and educational levels, housing affordability challenges, and greater exposure to pollutants and stressors. While NCPC's mission and authorities have limited application to development on non-federal lands, there is still a need for a thorough evaluation of the Comprehensive Plan to determine which policies may lead to unintended barriers for underserved communities, and where new or revised policies could reduce those barriers, particularly on racial and income inequities in the region and opportunities for improving accessibility for people with disabilities. NCPC also needs a comprehensive framework to examine potential inequities in the Comprehensive Plan and support equity outcomes across policy topics.

B. Action and Intended Impact on Barrier

Since the Comprehensive Plan informs many of the agency's core programs, it is critical to put a framework in place to address equity. NCPC will first update the Comprehensive Plan's Introduction Chapter to provide a planning framework and new guiding principles to address equity in all eight Federal Elements. The updated Introduction will provide the historical context of underserved communities in the region and practices that did more harm, establish baseline data, as well as guide subsequent updates to the remaining Federal Elements around public engagement and policy.

NCPC will also develop an equity crosswalk, which is a compilation of all existing Comprehensive Plan policies that focus on advancing equity. This tool will be critical to assess the Comprehensive Plan's cumulative impacts on underserved populations and communities and help the agency to deliver on the equity goals established in the Introduction. The equity crosswalk will also be a useful resource for NCPC's review of federal master plans, projects, programs, and initiatives.

Moving forward, NCPC will acknowledge the existing policies in the Comprehensive Plan that have created barriers to underserved communities, engage those communities, and find opportunities to eliminate and/or reduce those barriers when each element is updated. NCPC will review and update its analyses and policies to

incorporate key federal and regional data sets that have been disaggregated by race, income, and other factors. NCPC is committed to working with agencies such as the Bureau of Labor and Statistics, Office of Personnel Management, the Census Bureau, and MWCOG to obtain this data. NCPC also anticipates more explicitly referencing MWCOG's Equity Emphasis Areas, which are small geographic areas that have significant concentrations of low-income, minority populations, or both. These actions will help identify vulnerable people and geographic areas and ensure equitable protection from hazards and equitable distribution of amenities.

NCPC will also expand and redevelop the public engagement strategy for upcoming Comprehensive Plan updates and find opportunities to engage historically underserved communities. Updating the Comprehensive Plan is treated as formal rulemaking, which typically requires publication of a notice of a proposed and final rule in the Federal Register, release of draft documents for public comment for a 60-day period, and staff and Commission review of any public comments received to inform changes, if any, to the proposed rule. In addition, NCPC will go beyond the formal rulemaking process specified by our authorities and federal requirements and seek to notify and engage underserved communities. These outreach strategies may include:

- Identify and contact underrepresented groups. Coordinate with federal applicant agencies and regional agencies to identify specific equity concerns.
- Conduct public outreach and meetings in a way that reduces barriers and burdens (e.g., at different times, with accessible and multilingual formats). This may include hybrid digital/in-person meetings, informal interviews and conversations, and meetings in community locations, as part of already established meetings.
- Create advisory groups or focus groups from underserved communities.
- Develop clear, accessible information on NCPC's website and in other formats.
- Conduct extensive media outreach with the goal of extending information into underserved communities in a variety of formats.

C. Tracking Progress

In the near term, NCPC will measure success by the completed Introduction Chapter and equity crosswalk, incorporation of data sets disaggregated by race, income, and other factors throughout the Comprehensive Plan, and the extent to which these datasets and policies are used in plan and project review and in the Federal Capital Improvements Program (FCIP) (further described later in this plan). NCPC will also track engagement with underserved communities measured by expanded contact lists, accessible information and meetings formats, and increased meetings and outreach efforts. Long-term success will be measured by updates to individual elements in the Comprehensive Plan (listed below) and the equity crosswalk, increased engagement with underserved communities, and robust performance measures to track equity outcomes in the FCIP and plan and project review process described later in the plan.

- The **Introduction Chapter will be updated in FY 2022** to include a new framework on how to address equity throughout the updates of the Federal Elements and an equity crosswalk that advances equity and identifies existing policies that may be barriers.
- The Federal Workplace Element will be updated in FY 2023 to address equity as it relates to the location, design, and operations of federal facilities, federal workforce, facility customers, and the surrounding communities in the region. The update will address the impacts of COVID-19 on the federal workplace.
- The **Urban Design Element will begin to be updated in FY 2022** to address equity as it relates to security and access in the public realm.
- The **Federal Environment Element will begin to be updated in FY 2023** to address equity as it relates to climate change and environmental justice.

• The Visitors & Commemoration Element will begin to be updated in FY 2023 to address equity by ensuring that future generations have commemoration opportunities and encouraging new approaches to commemoration.

D. Accountability

NCPC staff will be responsible for carrying out these actions, which have been included in the agency's work plan. The equity action items identified for the Comprehensive Plan are consistent with NCPC's Strategic Plan core values for inclusiveness. NCPC will provide the Commission and public updates on the policies in the Comprehensive Plan through the equity crosswalk that will highlight progress on equity work. NCPC will provide updates on the progress of these actions in the yearly fiscal performance reports.

Action Item #3 – Federal Capital Improvements Program

A. Barrier to Equitable Outcome(s)

In accordance with the National Capital Planning Act, NCPC annually reviews and recommends a six-year program of federal capital improvement projects for the NCR and provides planning recommendations on these projects to the Office of Management and Budget (OMB) prior to the release of the President's budget. The Federal Capital Improvement Program (FCIP) provides a six-year outlook of where capital investments will occur within the region. NCPC evaluates each agency's capital improvement projects using the FCIP Project Scorecard, which considers consistency with policies in the Comprehensive Plan's Federal Elements, NCPC-approved master plans for federal installations, NCPC-approved site and building plans, NCPC-adopted plans and policies, and other federal interests.

Many NCPC plans and policy documents largely focus on equality instead of advancing equity for all. Therefore, the submitted data and analysis do not focus on equity goals. Populations most impacted by the absence of an equity analysis of capital improvement projects are underserved communities within the NCR who may be adversely impacted by the location and development of capital improvement projects in a manner that creates environmental hazards, barriers to access or displacement, or loss of economic opportunity or stability. Conversely, capital improvements also present the potential to bring employment, transportation, services, amenities, and other opportunities to underserved communities, which an equity analysis could also explore. As previously noted, the updated Comprehensive Plan and other resource documents will be used to identify MWCOG's Equity Emphasis Areas, regional locations subject to natural and manmade environmental hazards, areas with environmental justice issues, and other place-based considerations in relationship to existing and proposed federal facilities.

B. Action and Intended Impact on Barrier

NCPC will reduce and eliminate barriers by actively engaging with federal applicant agencies during the submission of projects for evaluation during the FCIP cycle. NCPC will reformat the project submission portal to incorporate a series of required equity-related questions for applicants to answer on how their capital improvement projects may impact underserved communities and create or reduce disparities. Projects will be evaluated utilizing a combination of tools, including Equity Emphasis Areas, existing policies within the Comprehensive Plan, and the new equity crosswalk to be developed for the Comprehensive Plan. Each project will be scored during this evaluation for its impacts on underserved communities, if applicable. NCPC will also engage with federal agencies and provide information and resources on equity issues to help them consider equity early in the planning process of capital investments, prior to the final design and construction of projects within the region.

Site selection and capital improvement funding by federal agencies in the region can have profound equity considerations. NCPC will seek to work collaboratively, as noted above, with federal agencies to assess equity impacts for regional site selection and capital improvement projects. Conducting this review at an early stage, before preparing detailed plans for construction or making commitments to acquire land, provide opportunities to influence equitable project outcomes. These analyses will be submitted as part of the FCIP to the OMB as predecisional information to inform budget development.

C. Tracking Progress

Progress of capital projects will be tracked at multiple stages during the FCIP submission cycle (which includes two data calls), and during subsequent submissions of capital projects in future FCIPs. During an FCIP cycle, applicant agencies will submit capital projects during the first data call. NCPC staff will work with agencies to refine projects to address equity considerations through the second data call. Then staff will finalize the project's FCIP scorecards before they are added to the final FCIP Report that is submitted to the Commission and OMB. NCPC will advance equity in the FCIP through this multi-phased process:

- **Beginning of Year 1 (Beginning of FY 2022):** NCPC will work with the OMB to develop equity questions to be included in the solicitation process for the upcoming FCIP FY 2023-2028 program.
- End of Year 1 (End of FY 2022): NCPC will evaluate the equity questions at the end of the FCIP cycle and work with the OMB and applicant agencies to refine the equity questions included in the solicitation process.
- Years 2-4 (FY 2023-2025): NCPC will incorporate the revised solicitation questions into the project submission portal and continue to evaluate agency commitments to equity goals outlined in their FCIP submissions as these projects transition to site plan review.

In the short term, after the inclusion of equity questions in the solicitation process, NCPC will measure success by the extent to which equity considerations are captured and addressed: first, in the FCIP evaluations, and subsequently during master plan and project submissions. Long-term success will be measured by the extent to which NCPC uses the FCIP to identify equity-related issues early in the planning and capital improvement process and influence project and plan development, design, and programs before submission to the Commission for review.

D. Accountability

NCPC staff will be responsible for carrying out these actions, which have been included in the agency's work plan. The equity action items identified for the FCIP are consistent with NCPC's Strategic Plan core values for inclusiveness. Due to OMB Circular No. A-11, the FCIP report is not for public dissemination. NCPC will be accountable for completing this work, as it is an annual program that is submitted to the OMB. As the projects identified in the FCIP report move further along through the project development, they will be submitted to the Commission in a public setting for project and plan review. NCPC will provide updates on the progress of the FCIP equity actions in the form of yearly fiscal performance reports.

Action Item #4 – Review of Master Plans and Significant Projects

A. Barrier to Equitable Outcome(s)

One of NCPC's primary functions is to review master plans and projects submitted by federal agency applicants for consistency with the Comprehensive Plan. Master plans guide the development at federal sites and military installations over a 20-year time horizon and present opportunities to shape future land uses, transportation patterns, and infrastructure choices at an early stage, when meaningful change is possible. Accordingly, master plans and significant projects can have considerable transportation, environmental, and land use impacts on adjacent communities, and NCPC staff work closely with applicant agencies to shape master plans to address these issues early in the process.

These impacts are usually analyzed through the National Environmental Policy Act (NEPA) process. Federal agency applicants often have the lead role in meeting NEPA requirements and have responsibilities under this law to address equity issues, as well responsibilities to address EO 13985. While NCPC also considers these impacts during its review process, more can be done to better support applicant agencies and ensure that the review process advances equity for underserved communities. NCPC's submission guidelines and engagement with applicant agencies do not specifically target equitable outcomes. Additionally, while the review process does include outreach to adjacent communities and opportunities for public comment during the NEPA process and at monthly Commission meetings, there are limitations to public engagement, especially among underrepresented communities.

Public engagement requires members of the public to be aware of the project, attend a meeting (usually outside of their community and occurring during the day), and evaluate project materials on their own and submit written comments. This process requires time and technological resources that not all communities have available to them. The Pew Research Center conducted a survey between January 25 and February 8, 2021 and found that only 23% of U.S. adults who earn less than \$30,000 annually have a smartphone, laptop, home broadband, and a tablet while 65% of U.S. adults who earn more than \$100,000 have this technology. As many meetings are currently held virtually, not having access to this technology is a critical barrier.

B. Action and Intended Impact on Barrier

To better support applicant agencies in applying an equity lens to their master plans and projects and conducting outreach with underserved communities, NCPC will provide a range of resources. These include relevant policies in the equity crosswalk of the Comprehensive Plan, mapped identification of underserved communities and Equity Emphasis Areas, and distribution lists to contact community members, civic organizations, and other impacted groups. A resource guide may be developed to summarize equity information.

NCPC will encourage applicant agencies to conduct public outreach, and specifically outreach to underserved communities, early in the development of master plans and significant projects, and to use outreach methods that reduce participation barriers. Master plans and significant projects are typically reviewed by the Commission at least twice and are circulated for regional agency review, and applicant agencies consult with NCPC in advance of formal submittal. NCPC will amend its Submission Guidelines to encourage applicant agencies to conduct public outreach, including public meetings, prior to formal submittal and/or early in the review cycle. In these meetings, the public can learn more about the plan or project under review and its potential impacts, as well as share feedback.

NCPC will also amend its Submission Guidelines to include an equity screening tool that consists of information applicants must provide related to equity concerns. These include positive and negative impacts on land use patterns, transportation networks and services, environmental assets, access to existing amenities, employment

opportunities, and economic development. NCPC will use this same tool to evaluate the plan or project for equity considerations and public outreach in its staff reports presented to the Commission.

Updating the Submission Guidelines is treated as formal rulemaking, which typically requires publication of a notice of a proposed and final rule in the Federal Register, release of draft documents for public comment for a 60-day period, and staff and Commission review of any public comments received to inform changes, if any, to the proposed rule. In addition, NCPC will go beyond the formal public outreach specified by its authorities and federal requirements and seek to notify and engage underserved communities, as well as federal applicant agencies.

NCPC's review of master plans and significant projects is based on Comprehensive Plan policies, so efforts to update the Submission Guidelines and develop screening tools should be conducted in tandem with, or immediately following, the equity updates to the Comprehensive Plan described earlier in this plan. Federal applicant agencies are also subject to EO 13985, so this screening tool should reflect how these agencies are incorporating equity considerations. Improving equitable public access to the plan and project review process also involves changes to the Commission meeting cycle, which are presented later in this plan.

C. Tracking Progress

In the near term, NCPC will measure the success of advancing equity in the plan and project review process by the identification of federal facilities that are located within or adjacent to underserved communities, the development of equity-related resources for applicant agencies, and annual outreach with applicant agencies to discuss the resources and their efforts to apply an equity lens. These resources will be developed through the Comprehensive Plan process noted earlier.

In the long term, NCPC will measure success by the update of its Submission Guidelines to encourage early public participation and include an equity screening tool for project submissions. Over time, applicants, in coordination with NCPC, will identify and address equity considerations in plan and project submissions, which will be documented in staff reports ("Executive Director's Recommendations"). These reports may also reference equity considerations captured earlier in the FCIP process.

D. Accountability

NCPC staff will be responsible for carrying out these actions, which have been included in the agency's work plan. The action items identified for the review process and Submission Guidelines are consistent with NCPC's Strategic Plan's core values for inclusiveness. NCPC will provide updates on the progress of these actions to the Commission and public, as well as in the yearly fiscal performance reports.

Action Item #5 – Public Engagement with Commission Meetings

A. Barrier to Equitable Outcome(s)

NCPC's Commission meets monthly to make decisions on submitted master plans and projects, and review and act on NCPC plans and initiatives. The daytime meetings are open to the public, live-streamed, advertised through an ecard distribution, website, and social media, and currently conducted online. Public testimony is accepted and reviewed at the meetings.

Outreach activities often focus on federal agency applicants, local jurisdictions, and civic groups and members of the public with specific interests in our work. Other members of the public and organizations participate based on their proximity to a project or plan, or interest in a particular issue. NCPC rarely receives testimony from the public outside of the NCR, except for projects involving commemoration or iconic spaces.

Agency outreach does not regularly reach and engage underserved communities, including people of color, members of the LGBTQ+ communities, people with disabilities, and those adversely affected by persistent poverty or inequality. There are several barriers to participation, including limits on who receives public notice and general awareness of the agenda proposals; mandatory review time frames which often result in limited time (less than 30 days) to conduct outreach, review an application, and bring it to the Commission; public comfort and ability to effectively navigate public comment opportunities; and limitations created by language, accessibility, meeting times, and having the resources and time to participate. As discussed in the previous action item, participation increasingly requires technological resources that aren't available to all. Data from the U.S. Census Bureau reveals that only 67% of households in Washington's poorest two wards have internet access, compared to 86% of households in the rest of the city. Members of the public are also often frustrated that NCPC's review can be limited to "federal interest" issues when their concerns about a particular project, which may have equity implications that are more appropriately directed locally, may not fall into that framework.

B. Action and Intended Impact on Barrier

To reduce these barriers and encourage greater participation among communities that do not usually engage with Commission meetings, NCPC will conduct the activities listed below. As a small agency, efforts to improve equity for public outreach and engagement activities related to the Commission meeting cycle process will provide cross-cutting outreach for all focus areas identified in the action plan.

- Actively research, contact, and add groups and representatives from underserved communities in the NCR to the agency's distribution list. Update the list at a minimum of every two years.
- Identify and meet with organizations from underserved communities individually or in a focus group setting to discuss NCPC's activities and opportunities to eliminate barriers and increase participation. To the extent possible, NCPC will seek to meet with these groups at locations, times, and in formats most convenient to them.
- Develop a hybrid meeting model that enables public comment and testimony by virtual participation, inperson attendance, and prerecorded video.
- Review existing website, ecards, public notices, and social media to determine ways to make it easier for the public and specifically underrepresented communities to access and understand Commission meeting materials and provide input. Consider best practices by other planning and federal agencies with similar missions.
- Conduct training with Commissioners and staff to ground them in equity issues and ensure that equity
 issues are addressed in projects and plans reviewed by the Commission. This will include presentations
 to the Commission on proposed steps to expand public outreach opportunities to underrepresented
 groups.

More broadly, NCPC will publicly reflect on the agency's historical impacts on the region, including its role in creating inequitable outcomes through urban renewal, highway construction, and federal development. As part of the agency's celebration of its centennial in 2024, NCPC will engage with the public to explore these past planning and development practices and how the agency and others are working to rectify these impacts.

To prepare for its centennial, in 2022-3 NCPC will research and prepare papers, digital or in-person exhibits, a digital library, and speaker events that explore those issues and how they shape today's built environment and the barriers and opportunities underserved communities experience. This work will focus on the 1950s-1970s through the context of two influential Commission Chairs, as well as key plans and federal development activities. In partnership with other federal, regional, and civic organizations, NCPC will encourage public discussion about equity and the region's planning history and explore ways to correct existing equity barriers.

C. Tracking Progress

As the agency does not track whether members of the public who attend Commission meetings or view related materials online consider themselves to be a part of underserved communities, it is challenging to measure the success of the agency's efforts. It may also be more difficult to assess whether the agency's efforts are successful as reflected in public testimony or comment unless the project is specifically led by NCPC, rather than submitted by another agency for review. However, in the near term, NCPC will be able to determine if its actions have reduced barriers to equitable access by the completion or measurement of the following factors:

- Expanded agency distribution list
- Updated public-facing materials, services, and practices that improve accessibility
- Provision of training and other resources to staff, Commissioners, and applicant agencies
- Staff review and consideration of equity issues in agenda items that come before the Commission
- Increased Commission meeting attendance and public testimony or comment

Outreach efforts to support equitable outcomes will be a primary principle framing a new NCPC public participation plan. NCPC will prepare this plan in the long term and incorporate equitable outreach and engagement practices as an integral component. The plan will serve as a guide for Commission activities and will offer a toolkit of best practices for agency initiatives.

In addition, the agency's centennial will include a variety of projects, with the overarching goal of expanding public awareness of past and existing equity issues in the NCR's planning and land use development patterns.

D. Accountability

NCPC staff will be responsible for carrying out these actions, which have been included in the agency's work plan. The equity action items identified for public engagement are consistent with NCPC's Strategic Plan core values for inclusiveness. NCPC will prepare a regular report to the Commission on outreach activities, analytics, and best practices. The agency will also provide updates on the progress of these actions in the yearly fiscal performance reports.

Note: Procurement

Executive Order 13985 requires agencies to identify potential barriers that underserved communities and individuals may face in taking advantage of agency procurement and contracting opportunities. Since NCPC is a small agency, procurement-related activities are minimal and focused on operational and administrative support, and procurement has not been identified as one of the agency's priority action goals. Nevertheless, when conducting market research for goods and services to support the agency's operations, the agency is committed to providing opportunities to small, disadvantaged, and traditionally underserved entrepreneurs. At present, for FY 2022, NCPC has agreements in place to expend ~19% of its contract spending with small, disadvantaged businesses (SDB). NCPC will proactively seek to increase agency procurement opportunities for SDBs in the coming fiscal years.