

# COMMENTS ON OP'S REWRITE TO THE DC COMP PLAN "DISPLACEMENT"

**From:** Jillian Burford  
**Sent:** Friday, January 10, 2020 6:06 PM  
**To:** [plandc@dc.gov](mailto:plandc@dc.gov) <[plandc@dc.gov](mailto:plandc@dc.gov)>  
**Cc:** Daniel del Pielago <[daniel@empowerdc.org](mailto:daniel@empowerdc.org)>  
**Subject:** Comments on Displacement

To Whom It May Concern:

I am submitting these comments on "Callout Box: What is Displacement?" in the Housing Element chapter on behalf of Empower DC and the DC Grassroots Planning Coalition. Due to the lack of clarity around proper submission guidelines, I hope that my comment submission in this table format is appropriate.

Proposed Text	Comment
<p>"physical displacement as households must move when the properties they occupy are redeveloped"</p>	<p>Redevelopment is not the sole cause of displacement of households. Foreclosures and reverse mortgages are common causes of displacement and homeless in DC among homeowners. In May 2009, the Urban Institute cited the National Coalition for the Homeless' survey that reported received responses from former homeowners who stated that they are moving from place to place to avoid being on the street.</p> <p>The demolition of public housing properties is also common form of physical displacement, as well as renters not being protected under rent control and stabilization.</p>
<p>"cultural displacement as residents lose a sense of belonging or shared identity in their neighborhood due to neighborhood change or growth"</p>	<p>To reference "cultural displacement" in this manner puts the onus of these feelings on residents and not the sudden influx of transient residents brought in by developers and predatory real estate agents.</p>
<p>"The loss of naturally occurring affordable housing units illustrated in Table 5.5 along with the decline of lower income, primarily black,</p>	<p>Expand on this further to provide a broader scope on what has happened. To build a truly inclusive, racially-equitable city, this narrative needs to</p>

<p>households discussed in the Framework Element indicate Washington, DC has experienced significant displacement in many neighborhoods and across the city.”</p>	<p>be consistent to build towards that goal. This is not enough. CAPITALIZE: Black</p>
<p>“National-level studies suggest that, by some measures, the District is the US city most impacted by both the increasing demand for housing from higher-income households and the decline in the number of lower income households.”</p>	<p>These studies need to be referenced and cited. Gentrification also needs to be named as the leading cause. While other major cities are experiencing naturally occurring cycles of gentrification, DC is experiencing the highest rate of displacement. Gentrification is only mentioned by name one time and needs to be explained for those unfamiliar with the proper usage of the term.</p> <p>Reported by: The Institute on Metropolitan Opportunity (April 2019) National Community Reinvestment Coalition (March 2019) 2009-2013 American Community Survey, US2010 Longitudinal Tract Data Base</p>
<p>“Between 2006 and 2017, Washington, DC experienced a decline of more than 15,600 households earning between 30 and 80 percent of the MFI;”</p>	<p>The Washington Post puts this number as over 20,000 Black residents between 2000 and 2013 and references the report by the National Coalition for the Homeless. (March 2019)</p>
<p>“Washington, DC has one of the strongest set of anti-displacement programs in the country, which includes rent control, eviction protection, Tenants’ Opportunity to Purchase Act, District Opportunity to Purchase Act, locally subsidized rents, tax assessment caps, and finally tax credits for low income and older homeowners.”</p>	<p>These programs have routinely failed to prevent widespread displacement. The District has also failed to actually put DOPA into action. While public housing is the last vestige for many low-income residents, TOPA is not an option for those residents. How do we create home ownership opportunities for public housing residents?</p>
<p>“Yet, protecting vulnerable citizens from the forces that lead to displacement clearly continues to be one of the greatest challenges to growing an equitable and inclusive city.”</p>	<p>Public housing residents are among the most vulnerable residents in the city, but they the most at-risk for displacement due to DCHA’s Section 18 and RAD plans for 14 properties, which does not take into account the</p>

	<p>loss of Barry Farm, Temple Court, or Arthur Capper-Carrollsborg. Residents who were not eligible for vouchers or have failed to find affordable units have been spread among the 14 properties slated for disposition in the Mid-City, Upper NE, Far SE/SW, and Far NE/SE Area Elements. With the removal of these 14 properties from the housing stock, that is over 2600 units lost.</p>
<p>“It is incumbent upon the District to strengthen existing policies and develop new ones to counteract and mitigate physical and economic displacement.”</p>	<p>Many of these policies need to become actions to avoid permanent, widespread physical and economic displacement.</p>

Best,

**Jillian Burford**  
**Community Organizer**  
Empower DC

1419 V Street NW  
Washington, DC 20019  
202-234-9119 x 103  
@Empower DC  
[www.EmpowerDC.org](http://www.EmpowerDC.org)