

**DRAFT FOR PUBLIC COMMENT**  
**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**  
**WASHINGTON, D.C.**



**DC Department of Housing and Community Development, the Lawyers’  
Committee for Civil Rights Under Law, and the Poverty and Race Research  
Action Council (PRRAC)**

**September 2019**

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September 2019 DRAFT

**DISTRICT OF COLUMBIA  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:**

**II. EXECUTIVE SUMMARY**

**INTRODUCTION**

In Washington, D.C., as across much of the nation, our country's long history of housing discrimination and segregation continues to shape where people live, who their neighbors are, and what kind of access they have to our collective resources. In D.C., as well as the surrounding region, there remain stark patterns of residential segregation, even though today's causes are in some ways more subtle than the redlining and restrictive covenants of the past. There are also meaningful disparities among demographic groups across a range of issues that closely intertwine with housing discrimination and segregation (and the equally long, related trajectory of disinvestment and economic vulnerability). The dramatic housing cost increases and waves of displacement experienced by many residents present an additional fair housing challenge for the District, often leading to both housing instability and the reconstitution of segregation and poverty. Patterns of exclusion in some parts of D.C. and the region contribute to this overall shortfall in supply, as well as to the persistence of racial segregation.

The Fair Housing Act prohibits discrimination by public and private actors in housing and related activities on the basis of race, color, national origin, sex, disability, religion, familial status, as well as policies that reinforce housing segregation. The Act's Affirmatively Furthering Fair Housing (AFFH) provision also requires that HUD and its funding recipients take *active steps to promote fair housing* – to address the specific fair housing problems faced within localities and regions. HUD has defined the AFFH obligation as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."

This Analysis of Impediments to Fair Housing Choice (A.I.) sets out a number of specific goals and actions steps for the District to advance fair housing, by expanding open housing choice and taking steps to remedy residential exclusion, addressing cost pressures and housing instability, and channeling investments to the communities where they are needed. The completion of an A.I. is required of all localities receiving specific funding from the U.S.

Department of Housing and Urban Development.<sup>1</sup> This A.I. provides a tool to help the city and members of the community better understand fair housing issues in the city and region, so that the city can meet its statutory obligation under the Fair Housing Act to take steps to “affirmatively further fair housing” (AFFH), and it stands as a commitment that the District will take meaningful steps to address the issues identified and further fair housing.

## **USING THE DOCUMENT**

Following the Assessment of Fair Housing format, this document begins with an examination of demographic trends in D.C. and the region, and then proceeds to examine number of fair housing issues and areas – segregation/integration, racially/ethnically concentrated areas of poverty, disparities in access to opportunity, publicly-supported housing, and disability and access – as well as the adequacy of fair housing enforcement resources. Each of these sections includes a data-focused “Analysis” component that draws primarily upon data provided by HUD, in addition to local data sources, to provide a detailed look at the state of that aspect of fair housing. This data “Analysis” is followed by a discussion of “Contributing Factors,” which assess local and regional policies, practices, and other dynamics, and examine the ways in which they underlie and contribute to the various fair housing issues. In addition, the AI is accompanied by a “Free Market Analysis” that examines demographic distribution and segregation apart from the effects of household income (also summarized in the segregation section). Finally and most importantly, the A.I. identifies policy responses to address the fair housing issues and problems described by the document. Those can be found in the “Goals” section. The A.I. as a whole draws upon HUD-provided data, additional local data, qualitative materials such as policy documents and advocacy reports, and public input.

## **SUMMARY OF CONTENT**

### ***Demographics***

The Analysis of Impediment’s demographic summary examines the overall demographic composition of D.C. and the metropolitan region (examining racial and ethnicity, common national origins, Limited English Proficiency, sex, age, disability, and familial status), and trends over time. As of the 2010 Census, D.C.’s population was 691,723, primarily people of color (50.03% non-Hispanic Black, 34.81% non-Hispanic White, 9.10% Hispanic, 3.50 non-Hispanic Asian or Pacific Islander, 0.22% non-Hispanic Native American, 2.10% non-Hispanic multi-racial, and 0.24%); more recent data from the American Community Survey show a population over 670,000, with 46.87% non-Hispanic Black residents and 10.68% Hispanics. The share of

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<sup>1</sup> This A.I. uses a lightly adapted version of the “Assessment of Fair Housing” format developed by HUD in 2015.

Blacks has decreased notably since 1990, while the share of Whites (and to a lesser extent Hispanics and Asians) has increased.

### ***Segregation and Integration***

This section examines racial concentration and cross-racial exposures and trends over time, as well as concentrations of renter and owner-occupied housing. Segregation was created and is reinforced by a combination of public policies, as well the private sector – factors such as restrictive zoning, housing and lending discrimination, cost pressures and displacement (potentially leading in turn to resegregation in areas of concentrated poverty), and others addressed in further detail in the report body. Notably, the geographic distribution of the most and least affordable housing units across D.C. neighborhoods tracks (and significantly contributes to) segregation.

D.C. has very high rates of ethnic and racial segregation, with clearly defined spatial patterns. As the data in the report body shows in more detail, Black residents are heavily concentrated in the eastern neighborhoods of D.C., and especially in Wards 7 and 8. In contrast, neighborhoods that lie west of Rock Creek Park are predominantly white, and there are also concentrations of white residents in many central neighborhoods. A number of other neighborhoods in D.C. are relatively integrated and diverse, such as Columbia Heights, Adams Morgan, Takoma, and the U Street Corridor. Across the wider metropolitan region, many areas are segregated by race, as well as by national origin.

Historically, D.C. has been highly segregated by race and income, with the legacy of restrictive covenants and redlining still felt in the present. Black residents formed a majority of the D.C. population for decades until 2011 and still make up a plurality of all residents. D.C. has experienced tremendous population growth in recent years. In-migration of White residents as well as Hispanics and Asians have helped to integrate areas that were once predominantly Black, but residential segregation remains entrenched across much of D.C. and Black/White segregation remains extremely high. Despite the large demographic changes, geographic patterns of segregation are largely the same as they were in 1990. There has been increased integration in central neighborhoods that have experienced gentrification, as well as in some neighborhoods experiencing a wave of new residential development activity. In Navy Yard, massive redevelopment has helped transform the neighborhood from predominantly Black to predominantly Non-Hispanic White. Looking forward, neighborhoods that are experiencing gentrification and are currently relatively integrated could become segregated in the future as residents of color continue to become displaced. In addition, as more affluent residents continue to move into the city, lower-income residents face increased housing pressure and may be displaced to neighborhoods in the eastern portions of the city as well as to suburban communities, particularly in Prince George's County, that have more affordable housing stock.

In D.C., most households (57%) rent rather than own their homes. Renter occupied housing tends to be concentrated in neighborhoods closer to Downtown that have high population density and have many rental housing options, and there is also a notable concentration of census tracts with very high rates of renter occupied housing in portions of Southeast D.C. that are east of the Anacostia River and are some of the most racially segregated neighborhoods in the city. While there is a substantial amount of renter occupied housing located in Racially/Ethnically

Concentrated Areas of Poverty (R/ECAPs) and other segregated areas of D.C., there is also a high concentration of renters in some of the most integrated neighborhoods in D.C.

### ***Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)***

R/ECAPs are geographic areas with significant concentrations of both poverty and minority populations (according to thresholds specified by HUD). Identifying R/ECAPs facilitates understanding of entrenched patterns of segregation and poverty, in order to assess questions such as where additional infrastructure and commercial investments are needed and whether affordable and publicly assisted housing policies contribute to concentrated poverty. Out of the 179 Census tracts in D.C., 46 are R/ECAPs (25.6%) as of 2013. R/ECAPs are especially located in northeast and southeast D.C., coinciding with Wards 5, 6, 7, and 8. Most neighborhoods in Ward 8 are R/ECAPs, as are many neighborhoods in Ward 7. There have been changes in the number and location of R/ECAPs in both the District of Columbia and the region, most noticeably between 2000 and 2010: the overall number has increased, and there has been a somewhat greater suburbanization of poverty. (In 1990, there were 39 R/ECAPs in the region, of which 37 were in D.C.; as of 2013, there are 56 R/ECAPs regionally of which 46 are in the District.) However, R/ECAPs remain considerably concentrated in southeastern neighborhoods, a consistent trend stretching back to at least 1990.

### ***Disproportionate Housing Needs***

D.C. and the Region are experiencing unprecedented housing burdens, compounded by the stark disparities in wealth between White and Black residents. Gentrification forces drive the displacement of many low-income households of color not just from their neighborhood of choice, but from the city entirely. Common metrics of disproportionate housing needs include severe housing cost burden, overcrowding, homeownership rates, and even homelessness. White residents fare best in every one of these metrics, in which Black and Hispanic residents face severe housing burden at twice the rate of White residents, Hispanic households face overcrowding at six times the rate of White households, White households outpace every other racial or ethnic group in terms of homeownership by at least 10 percentage points, and a startling 88% of homeless families in D.C. are African American. Although the District provides for inclusionary units created by developers, in addition to subsidized housing, the need by far outstrips the supply among both low- and moderate-income residents.

### ***Disparities in Access to Opportunity***

This analysis examined five dimensions of Disparities in Access to Opportunity: Education, Transportation, Employment, Poverty, and Environmental Health, in relation to demographics. Education, being highly dependent on where people live, is also highly segregated, and students experience stark differences in access to opportunity. School segregation and neighborhood disparities in access to proficient schools have a mutually reinforcing relationship with housing segregation, and local education policies have a strong influence in shaping this dynamic. There are no clear disparities indicated by the data with regard to access to transportation – every group has very good access. Nor does the data show significant disparities with regard to access to

environmentally healthy neighborhoods; however, this is due to across-the-board poor environmental health in D.C., mostly due to traffic and smog levels. The analysis of Disparities in Access to Low Poverty Neighborhoods closely tracks the R/ECAP analysis, and there are clear disparities between the western and eastern parts of the city, closely following lines of residential segregation. Stark disparities are evident in the Employment analysis. The extreme difference between the Labor Market and Job Proximity Indices' levels for Black and White residents indicates that Black residents are systematically denied the same access to opportunity that White residents enjoy.

### ***Publicly Supported Housing***

This analysis examines locational and occupancy data for publicly supported housing in D.C. and the region, including a number of housing assistance programs (public housing, project-based Section 8 vouchers (PBVs), Other Multifamily Assisted Developments, Housing Choice Vouchers (HCVs), and Low Income Housing Tax Credits (LIHTC) (location only)). It also assesses local policies and practices in the administration of assisted housing. Although the broader housing and land use ecosystem – such as zoning laws, private discrimination, and cost pressures – affects how such housing is located and accessed, the policy decisions and administrative practices of local agencies play a strong role (discussed in detail in the report body).

Occupancy data indicates racial and ethnic disparities across the various types of publicly-supported housing. In every type, Black households are consistently over-represented in publicly supported housing relative to the total population of Black households in D.C. as well as relative to income eligible households. This pattern holds at the regional level, though it is less pronounced. With regard to location, public housing developments are generally concentrated in southeast and southwest D.C. (Wards 1, 6, 7, 8), where the population is heavily Black. Notably, public housing developments with significant numbers of family units (over 50%) are especially likely to be located in areas with a high Black population – on average, the average racial composition of tracts where such developments are located is 87% Black; similarly, PBV developments where the majority of households have children are on average located in tracts where the racial composition is 90% Black. The current distribution of LIHTC properties overall, meanwhile, is heavily skewed toward the east of Rock Creek Park and south of the Anacostia River.

These locational dynamics serve to reinforce racial segregation and to impede access to opportunity for subsidized households (and in particular those with children, creating an intergenerational cycle). In addition, redevelopment practices must contend with both segregation/poverty concentration and with rising cost pressures, and should be carefully designed to avoid unfair and negative impacts. In addition, subsidized housing administration suffers from a lack of external or coordinated resources, to aid with basic repairs and to bring commercial and infrastructure investments to existing sites in need of revitalization.

### ***Disability and Access***

There is a significant shortage of affordable, accessible housing in a range of unit sizes in both D.C. and the Region. In D.C., persons with disabilities face hurdles in accessing integrated housing due to extremely high and rising housing costs despite some of the most extensive efforts to support community-based living in the United States. Additionally, as affordable, accessible housing tends to be concentrated in low-income areas in the eastern part of D.C., this has the effect on concentrating people with disabilities, who are disproportionately low-income, in R/ECAPs. The District has provided substantial local funding for housing for persons with developmental disabilities, but maximum rent limits for that assistance severely constrain the range of neighborhoods in which individuals can secure housing. The District provides strong legal protections and administers several programs designed to aid people with disabilities in the areas of employment, transportation, government services, infrastructure, and education.

### ***Free Market Analysis***

The Free Market Analysis (FMA) that is included as a separate section of the Analysis of Impediments provides an additional empirical examination of how discrimination distorts the housing market and results in segregation. It does so by considering how race or ethnicity shapes residents' housing locations even apart from the effect of housing cost and household income.

Several notable results emerge. First, the FMA suggests that discrimination appears prevalent in the northwest quadrant of the District. In these neighborhoods, the actual proportions of Black households (2.9 to 8.5 percent) are lower than the proportions expected in a housing market absent discrimination (18 to 27 percent). Second, the FMA points to hypersegregation, especially in neighborhoods east of the Anacostia River. The actual proportions of White households are very small, even though you would expect them to be at least 43 percent in the absence of discrimination. Third, there are some sections of the District that appear integrated. These include Census tracts in neighborhood clusters 1 through 9 and 20, 21, 22, 23, 25, 26, and 27. In these neighborhood clusters, the differences between the actual and expected free market proportions of white and African American households are relatively small, suggesting less evidence of discrimination.

### ***Fair Housing Enforcement***

This part of the A.I. assesses the available resources for educating the public on fair housing rights and for enforcing anti-discrimination claims, as well as the sufficiency of local legal protections. The District has a wide array of fair housing protections, including against source of income discrimination (for example, on the basis of participation in the Housing Choice Voucher program). Several entities in D.C. carry on robust education and enforcement campaigns. However, additional resources remain needed.

### *Fair Housing Goals*

The Goals section identifies the policy commitments that the District of Columbia will undertake in order to further fair housing, responding to the issues and contributing factors described throughout the A.I.

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### III. Community Participation Process

1. *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.*

In order to ensure meaningful community participation in the Analysis of Impediments process, the District undertook several steps. First, the District's consultants directly contacted a broad range of stakeholder organizations in order to hold one-on-one meetings. Organizations with which the consultants met are listed in response to Question 2 of this section below. Second, the consultants gave presentations regarding the Analysis of Impediments process at events organized by the Department of Housing and Community Development including its three needs assessment hearings and its fair housing symposium as well as at a meeting of the Development Disabilities Council. Third, the consultants have held a series of community meetings in every ward in the District. The dates and locations of these meetings are listed below:

- April 9, 2019 – Westminster Presbyterian Church (Ward 6)
- April 15, 2019 – West End Library (Ward 2)
- April 29, 2019 – Franklin D. Reeves Municipal Center (Ward 1)
- April 30, 2019 – Petworth Library (Ward 4)
- May 6, 2019 – Cleveland Park Library (Ward 3)
- May 7, 2019 – Dorothy I. Height/Benning Library (Ward 7)
- May 9, 2019 – Anacostia Neighborhood Library (Ward 8)
- May 29, 2019 – Lamond-Riggs Neighborhood Library (Ward 5)
- June 20, 2019 - West End Library (Ward 2)

For a 30-day period following the publication of this draft, the District will receive public comment in written and electronic form as well as at a series of additional public hearings across the city. All community meetings held prior to the publication of the draft were promoted through a combination of social media and direct outreach to community-based organizations. Formal public hearings during public-comment period will also be promoted through notices in traditional forms of media.

2. *Provide a list of organizations consulted during the community participation process.*

Organizations consulted during the community participation process include:

- Apartment and Office Building Association of Metropolitan Washington
- Asian Real Estate Association of America (AREAA) – DC Metro Chapter
- CARECEN
- Casa Ruby

- DC Association of Realtors
- The DC Center for the LGBT Community
- Disability Rights DC
- District of Columbia Autism Society
- Empower DC
- Equal Rights Center
- Georgetown University Law Center Civil Rights Clinic
- Georgetown University Law Center Health Justice Alliance Clinic
- Greater Greater Washington
- Housing Counseling Services
- Howard University School of Law Fair Housing Clinic
- Law Students in Court
- Legal Aid Society of the District of Columbia
- Live Together, Learn Together
- National Housing Trust
- Washington Lawyers' Committee for Civil Rights and Urban Affairs

On Tuesday May 28th, parents and advocates of the Live Together, Learn Together (LTLT) coalition had the opportunity to react to an outline of the AI sections that pertained to education. Certain thoughts from this meeting, as well as two other education-related focus groups conducted during the month of May, were incorporated into the Disparities in Access to Educational Opportunity. The focus group included advocates and professionals active in various roles within the D.C. public education policy landscape.

3. *Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?*

These outreach efforts have been successful in eliciting broad community participation up to this point in the Analysis of Impediments to Fair Housing Choice process. Although attendance at individual community meetings varied and was low in certain locations (including both predominantly White areas like Ward 2 and predominantly Black areas like Ward 7), aggregate attendance across the meetings was substantial. Additionally, the scope of the one-on-one stakeholder meetings was simultaneously broad and successfully targeted organizations that serve and/or represent protected class groups. Additional targeted advertising, such as posting flyers at businesses or community organization offices that serve protected class groups is one step that could increase participation in the future. Furthermore, arranging to attend the previously scheduled events of community-based organizations would help deepen community engagement.

4. *Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

The final version of this Analysis of Impediments to Fair Housing Choice will include a summary of comments received and the reasons why any comments or views were not accepted. At this juncture, the District has yet to receive formal public comments through the community participation process.

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#### IV. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

- i. *Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.*

The following goals and strategies were recommended in the District's 2012 Analysis of Impediments to Fair Housing Choice:<sup>2</sup>

- Private Sector Recommendations:
  - Promote expansion of housing choice throughout the area.
  - Make a concerted effort to inform Black and Hispanic/Latino residents of housing options beyond concentrated and racially segregated neighborhoods through the creation of a Housing Service Center, improvements to the DCHousingSearch website, and a targeted publicity campaign.
  - Promote affordable housing throughout the larger metropolitan area.
  - Conduct “ongoing, systematic, and thorough” testing for discrimination in housing rentals and sales throughout the area.
  - Provide pre-application loan counseling through the District government or a qualified organization to recognize unaffordable or predatory loans.
  - Refuse to bank and do business with financial institutions that engage in discriminatory housing practices.
- Joint Public and Private Sector Recommendations:
  - Implement/Enforce the Rental Housing Conversion and Sale act of 1980, including the Coop Seed Money Loan Program, First Right Purchase Program, and Deferred Payment Loans. It was recommended that the District collect and analyze extensive data regarding residents to ensure the most effective ongoing implementation.
  - Establish a policy of only renewing expiring business permits for those who agree via a legally binding document to comply with the mandatory inclusionary zoning law.
  - Include scattered site public housing as part of the inclusionary zoning program.
  - Include removal of obstacles to accessory apartments as part of zoning code revisions.
- Public Sector Recommendations
  - Explicitly include goals and plans to create stable, racially integrated neighborhoods.
  - In order to prevent discrimination before it occurs, require an agreement to comply with the Fair Housing Act and Americans with Disabilities Act before administering building permits, or zoning/development approval.

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<sup>2</sup> Planning/Communications, *District of Columbia Analysis of Impediments to Fair Housing Choice 2006–2011* (River Forest, IL: April 2012).

- Require developers or landlords to conduct targeted marketing to racial or ethnic groups that are underrepresented in the area. This marketing should include materials with a variety of races represented, brochures detailing illegal housing practices, and information on how to file a fair housing complaint.
- Replace the term “community-based residential facilities” with “community residences” in the zoning code, and adjust the definition to be consistent with the definition of family. This section should further be revised to allow for reasonable accommodations for facilities catering to those with disabilities and to determine the number of residents who can occupy a community residence.
- Train 311 operators with the knowledge to refer fair housing complaints.
- The Office of Human Rights should maintain better records of complaints that involve housing, all inquiries regarding housing discrimination, and the races/ethnicities of all public housing residents/voucher holders.
- Conduct a study of the availability of financial services in minority neighborhoods and examine whether redlining is occurring.
- Develop a policy to place public housing in integrated neighborhoods in and around the District, rather than in the 13 hypersegregated neighborhoods.
- Expand the available locations for use of Housing Choice Vouchers, and try to recruit more voucher holders for the Moving to Work program.

ii. *Discuss what progress has been made toward the achievement of fair housing goals.*

- FY 2012
  - Partnerships with the Department of Mental Health to increase funding for affordable housing for those with disabilities.
  - Partnerships with community based organizations to provide fair housing counseling, and other integrated legal and financial assistance.
  - Implementation of the Inclusionary Zoning Program, which requires all developers producing 10 or more units to set aside up to 10% of the residential units for affordable housing in exchange for a 20% density bonus.
  - Establishment of DCHousingSearch.org, a website for DC residents to search housing funded by DHCD or the DC Housing Finance Agency, private properties that are affordable for families making up to 120% of AMI, and properties included in the DC Housing Authority Housing Choice Voucher Program.
  - Engaged in targeted foreclosure prevention for identified high interest trust loans within the DHCD portfolio that included counseling to prevent default.
  - Continued use of the Affirmative Marketing Certification to ensure that new projects are in compliance with federal and local laws and that they are marketed to the groups least likely to know of the availability within the projects.

- Continued funding of housing production through the Housing Production Trust Fund.
- Enforcement of the Rental Housing Act of 1985 (rent control).
- Enforcement of the Rental Housing Conversion and Sale Act of 1980.
- Enforcement of the rental housing statutes through the Housing Regulation Administration.
- Fair Housing technical assistance and training for sub grantees through the DHCD Office of Program Monitoring's Fair Housing department.
- Continued holding the Annual Fair Housing Symposium, a day of fair housing programming for providers and advocates.
- Partnered with community based organizations that provide outreach and education regarding fair housing policies. Specifically, DHCD partnered with University Legal Services, the Latino Economic Development corporation, Lydia's Hose, the Central American Resource Center, and Housing Counseling Services, Inc. in 2012.
- Provided general accessibility and fair housing literary trainings.

Many efforts since the previous AI have been continued from 2012 to the present, which DHCD has documented in its Consolidated Annual Performance and Evaluation Reports (CAPERs), which it submits to HUD each year. The policies and programs for each consecutive year will list any additional efforts not previously detailed for another year.

- FY 2013
  - Monitoring and enforcement of the Affordable Dwelling Unit program, which restricts occupancy to households that make up to a certain amount. These units are usually priced below market rate. The Affordable Dwelling Unit program is an umbrella term for multiple activities that target a range of low- and moderate-income households.
  - Created the "Great Streets Initiative," a long-term and inter-agency commercial revitalization project that uses public resources as leverage to encourage private development of various uses.
  - Green Building Requirement: Consistent with the Green Building Act of 2006, DHCD started requiring that any proposals for buildings larger than 10,000 square feet and are built with more than 15% public financing must comply with the green building standard.
  - Partnership with the Washington Area Bicyclist Association to bring more biking opportunities east of Anacostia River.
- FY 2014
  - The Housing Resource Center, which provides housing counseling and training in partnership with University Legal Services, houses the Housing Provider Ombudsman, and handles filings for the Rental Accommodation Division and the Conversion and Sales Division. Through those activities, the

Housing Resource Center works to increase fair housing choice for persons with disabilities in D.C.

- FY 2015 (CDBG, HOME, and HOPWA Spending)
  - \$6.6 million allocated for the Home Purchase Assistance and Employer Assisted Housing Programs through the CDBG program. Additional HOME funds of almost \$1 million were also provided for these programs. This level of funding was approximately the same as the FY 2014 allocation.
  - \$1.6 million for the Single Family Residential Rehabilitation Program and the Multifamily Lead-Safe Program. By comparison, in FY 2014, the District allocated just \$1.2 million for the Single Family Residential Rehabilitation Program. The Lead Safe Program previously had much higher levels of funding due to a three-year competitive grant that the District received in FY 2012. Programs like the District's Single Family Residential Rehabilitation Program often help persons with disabilities, particularly elderly persons with disabilities, remain in their homes.
  - \$3.1 million allocated for revitalization of abandoned and/or deteriorated properties and making them available for DC residents of all income levels to purchase. The District did not report allocating funding for this activity in its FY 2014 CAPER.
  - \$6.75 million allocated for tenants making 50% of AMI or below to purchase any of the 92 units in the Juniper Heights Co-op in Ward 4. The surrounding area is relatively racially and socioeconomically integrated in comparison to D.C. as a whole and, due to its proximity to neighborhoods that are experiencing rapid gentrification, may be at risk of gentrification. Developing affordable housing in the area may help to prevent the resegregation of the area.
  - \$1.3 million to finance affordable rental housing at 60% of AMI, located at 6925 and 6929 Georgia Ave. in Ward 4. This development is located in the same Census Tract as the Juniper Heights Co-op.
  - \$1.5 million for new rental housing for seniors at or below 60% AMI, located at 10<sup>th</sup> Street and Rhode Island Avenue NE in Ward 5. The area surrounding this development, which is extremely close to the Rhode Island Ave.- Brentwood Metro Station on the Red Line, is relatively racially and socioeconomically integrated in comparison to D.C. as a whole. The area has been experiencing rapid gentrification, and investments in targeted investments in affordable housing like this one may help to maintain stable integration.
  - \$7 million allocated for the construction of North Capitol Commons in Ward 6, a 123-unit affordable rental housing building reserved for those at or below 60% of AMI. The area surrounding this development is predominantly White and has a high median-household income in comparison to D.C. as a whole.
  - \$3.5 million allocated for the construction of The Serverna II in Ward 6, a 101-unit affordable rental housing building reserved for those at or below

- 80% of AMI, with 71 of the units being held for those at or below 60% of AMI. The Severna II is located extremely close to North Capitol Commons.
- \$10.7 million allocated for various housing and support services for persons living with AIDS. This was a reduction from an allocation of \$12.5 million in FY 2014. This decrease was attributable to reductions in federal appropriations.
  - 124 inclusionary zoning units were completed. This was more than double the 60 units produced in FY 2014. Of the 124 units, 22 were for-sale, and 102 were for-rent. 23 units were set aside for 50% of AMI households, and 101 units were set aside for 80% of AMI households.
  - FY 2016
    - CDBG, HOME, and HOPWA Spending:
      - Allocated over \$11 million for redevelopment of the Walter Reed Army Medical Campus. When finished, the project will include 75 affordable residential units for “chronically homeless veterans,” 40 units of affordable rental housing for seniors, and support services. These units will be incorporated into a broader mixed-income development that does not contribute to the concentration of poverty.
      - \$6 million for the Pleasant Park Cooperative formed under the DC Tenant Opportunity to Purchase Act to ensure that the property remains long-term affordable housing. The area in Ward 7 surrounding this property is almost exclusively Black and has a much higher poverty rate than D.C. as a whole. Because this investment was for the preservation rather than the new construction of affordable housing, it does not raise as many questions about the impact of the District’s investments on the concentration of poverty.
      - \$5 million to renovate and modernize 148 affordable housing units in the Benning Heights Apartments in Ward 7. The area surrounding the development is similar in its racial and socioeconomic composition to the area surrounding the Pleasant Park Cooperative.
      - \$323,000 to build 25 new affordable housing units on Girard Street NE in Ward 5 for seniors, including resident and support services. The area surrounding this development is relatively racially and socioeconomically integrated in comparison to D.C. as a whole and is experiencing gentrification.
      - \$11 million allocated for various housing and support services for persons living with AIDS. This was a similar amount of funding to that allocated in FY 2015
    - The District was selected as a pilot site for the Living Building Challenge Affordable Housing Project, which will create 10-15 sustainable, mixed-income units from a vacant site.
    - Continued work with the private real estate industry to promote marketing images that represent diverse individuals and planned to conduct a public

- outreach/marketing campaign to inform the public about housing choices outside of racially segregated areas.
  - Planned to conduct on-going testing with fair housing agencies.
  - Made over \$100 million in Housing Production Trust Fund resources available to preserve affordable rental housing.
  - The District updated the Office of Human Rights website to provide more information and included a “How to File a Complaint” page. These pages and other materials were translated into and made available in seven languages as required by the Language Access Act.
- FY 2017-FY 2018
  - Used geographic targeting and transit proximity scoring when reviewing responses to requests for proposal (RFPs) for development in order to incentivize development in high opportunity areas, which would foster residential integration.
  - Provided \$14 million in home purchase assistance, and \$1 million in employer-assisted home purchase for district employees. In light of DHCD’s combined reporting for two fiscal years, this was a roughly similar amount of funding to that provided in prior years on an annual basis.
  - 2,000 affordable homes were produced or preserved using funds from the Housing Production Trust Fund. By comparison, the Housing Production Trust Fund produced 1,342 units in FY 2015 and 854 units in FY 2014.
  - Creation of the DC Housing Preservation Fund, funded at \$10 million, as a result of the Strike Force recommendations.
  - Creation of a Preservation Unit working group to develop strategies to prevent loss of 100% of expiring units.
  - Changes were made to the District’s Inclusionary Zoning Program that included streamlining the application process and allowing more flexibility in criteria.
  - 311 Operators were trained to refer callers to fair housing resources.
  - OHR has complied with the recommendation to take and maintain detailed records of all complaints with a housing element.
  - DC Housing Authority does maintain records of race and ethnicity for public housing residents and Housing Choice Voucher holders.
  - DC Housing Authority partners with owners and developers to produce new public housing as a subsidy option. 76 units were created using this process in FY 2017.
  - Housing Choice Voucher payment standards were increased to 175% of fair market rent, and remained at that level for RY 2018.

- iii. *Discuss how successful in achieving past goals, and/or how it has fallen short of achieving these goals (including potentially harmful unintended consequences)*

The District has made strides toward completing the 2012 AI goals on the administrative and regulatory front. On the administrative side, they have improved their websites and public communications to provide more resources and information on how to report housing complaints. They streamlined processes and worked on improved interagency cooperation. The District also took affirmative steps to prevent housing discrimination through administrative means, required agreements to comply with fair housing laws at the front end of contracts and responses to RFPs. In the regulatory space, while they are still reviewing regulations around community residences, they continue to enforce rent control, the Tenant Opportunity to Purchase Act, the Inclusionary Zoning Program, and the Accessory Dwelling Unit Program. The DC Housing Authority has also made strides towards the creation of more affordable housing. Despite being restricted to existing locations, they have worked with developers to create units via a subsidy option. They also increased payment standards for voucher holders, allowing for voucher holders to be less limited in their housing searches.

The main shortfall is with regard to where and how much affordable housing is produced. One of the major themes of the 2011 AI was that the District needed to make a concerted effort to place affordable housing outside of racially segregated areas. However, the data-gathering portion of this analysis, as well as the community participation portion, have revealed that affordable housing is often not placed in desirable neighborhoods. Further, despite a significant amount of funding being created to preserve and produce affordable housing, the District does not always maximize these opportunities through the projects they choose. For example, a report on the FY2018 Housing Preservation Trust Fund disbursement found that the District failed to select the highest ranked projects. Instead, they provided funding to projects ranked 5<sup>th</sup> or lower, some who had even been denied in the past.<sup>3</sup> As a result, “the city got 353 fewer units of affordable housing than it could have gotten had it chosen only the highest-ranking applications.”<sup>4</sup> 95 of those units would have been for lowest income households.

Additionally, although the District has continued to enforce the Tenant Opportunity to Purchase Act, the District Council has weakened that law by exempting single-family rental properties from its scope.

In addition, in many cases, the Council relies on the actual work of community-based organizations for the provision of housing counseling and fair housing enforcement. Though branded as partnerships, those organizations are the entities providing counseling and conducting testing. It was the recommendation of the previous AI that the District be directly responsible for these tasks.

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<sup>3</sup> <https://dcist.com/story/19/05/31/d-c-awarded-millions-to-low-ranked-affordable-housing-projects-auditor-funds/?fbclid=IwAR2kMRilmPeTJEAOPY4oRloSZLY8evsIPwIa60tK3C7w46KXjzWULyNmJxQ>

<sup>4</sup> Id.

- iv. *Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.*

Please refer to the Goals section.

- v. *Discuss how the experiences of program participant(s) with past goals has influenced the selection of current goals.*

Please refer to the Goals section.

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## V. Fair Housing Analysis

### A. Demographic Summary

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. The data discussed below reflects the composition of the Region and the District of Columbia (D.C.) jurisdiction. In addition to capturing current conditions, the data reflects change over time in the nearly three decades since the 1990 Census. The data and analysis in the other sections of this Analysis build upon the foundation laid in this section and, at times, refer back to this section.

1. *Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*

The two tables of data, provided by HUD, describe D.C. in regional context. The region (designated by HUD) includes: (1) D.C.; five counties in Maryland (Frederick, Montgomery, Calvert, Charles, and Prince George's); eleven counties in Virginia (Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren); six cities in Virginia (Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, and Manassas Park); and one county in West Virginia (Jefferson). Together, these are known as the Washington-Arlington-Alexandria Metropolitan Area, or the "Region."

**Race** is defined by the Census Bureau as a person's self-identification with one or more social groups. An individual can report as White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race. Survey respondents may report multiple races.

**Ethnicity** determines whether a person is of Hispanic origin or not. For this reason, ethnicity is broken out in two categories, Hispanic or Latino and Not Hispanic or Latino. Hispanics may report as any race.

In all of the tables, the Race groupings include only those who report that they are NOT of Hispanic origin. Those of Hispanic origin are reported under the Race groupings as Hispanic. Hispanic includes people of any of the races above.

#### *Race and Ethnicity*

As of the 2010 Census, the population of D.C. was 601,723 with persons of color comprising well over half of residents. More specifically (see table 1), 50.03 percent of residents were non-Hispanic Black, 34.81 percent were non-Hispanic White, 9.10 percent were Hispanic, 3.50 percent were non-Hispanic Asian or Pacific Islander, 0.22 percent were non-Hispanic Native Americans, 2.10 percent were non-Hispanic multiracial residents, and 0.24 percent identified as

non-Hispanic residents of some other race.<sup>5</sup> Between 1990 and 2010, the racial and ethnic make-up of D.C. changed considerably. The number and

**Table 1 – Demographics, District of Columbia and Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area**

Race/Ethnicity	District Of Columbia		Region			
	#	%	#	%		
White, Non-Hisp.	209,464	34.81%	2,751,392	48.82%		
Black, Non-Hisp.	301,053	50.03%	1,417,003	25.14%		
Hispanic	54,749	9.10%	775,180	13.75%		
Asian/Pacific Island, Non-Hisp.	21,034	3.50%	517,777	9.19%		
Native American, Non-Hisp.	1,322	0.22%	12,428	0.22%		
Two or More Races, Non-Hisp.	12,650	2.10%	146,763	2.60%		
Other, Non-Hisp.	1,451	0.24%	15,688	0.28%		
<b>National Origin</b>						
#1 country of origin	El Salvador	13,354	2.29%	El Salvador	171,075	3.18%
#2 country of origin	Ethiopia	4,901	0.84%	India	81,627	1.52%
#3 country of origin	Mexico	2,839	0.49%	Korea	58,945	1.10%
#4 country of origin	Guatemala	2,483	0.43%	Mexico	48,232	0.90%
#5 country of origin	Jamaica	2,334	0.40%	China	47,614	0.89%
#6 country of origin	China	2,301	0.39%	Vietnam	47,290	0.88%
#7 country of origin	India	2,281	0.39%	Philippines	47,206	0.88%
#8 country of origin	Dominican Rep.	2,166	0.37%	Guatemala	43,842	0.82%
#9 country of origin	Philippines	1,984	0.34%	Ethiopia	37,647	0.70%
#10 country of origin	Germany	1,942	0.33%	Peru	36,379	0.68%
<b>Limited English Proficiency (LEP) Language</b>						
#1 LEP Language	Spanish	16,201	2.78%	Spanish	285,375	5.31%
#2 LEP Language	African	3,225	0.55%	Chinese	35,954	0.67%
#3 LEP Language	French	1,648	0.28%	Korean	33,611	0.63%
#4 LEP Language	Chinese	1,644	0.28%	Vietnamese	29,164	0.54%
#5 LEP Language	Vietnamese	671	0.12%	African	28,359	0.53%
#6 LEP Language	Tagalog	519	0.09%	French	14,027	0.26%
#7 LEP Language	Portuguese	407	0.07%	Other Indic	13,539	0.25%
#8 LEP Language	Russian	407	0.07%	Tagalog	11,638	0.22%
#9 LEP Language	Italian	363	0.06%	Persian	10,874	0.20%
#10 LEP Language	Other Indic	348	0.06%	Arabic	10,013	0.19%
<b>Disability Type</b>						
Hearing difficulty	12,300	2.15%	113,491	2.14%		
Vision difficulty	13,453	2.35%	75,094	1.42%		
Cognitive difficulty	28,856	5.04%	163,053	3.08%		
Ambulatory difficulty	36,878	6.45%	226,972	4.29%		
Self-care difficulty	12,805	2.24%	87,848	1.66%		
Independent living difficulty	22,958	4.01%	158,349	2.99%		

<sup>5</sup> American Community Survey 2013-17 5-Year sample data show that the District of Columbia's population is over 670,000 (see Table 3). The share of non-Hispanic Black residents is 46.87%, while the share of Hispanics in the District is 10.68%.

<b>Sex</b>				
Male	284,222	47.23%	2,743,852	48.68%
Female	317,501	52.77%	2,892,380	51.32%
<b>Age</b>				
Under 18	100,815	16.75%	1,345,820	23.88%
18-64	432,099	71.81%	3,725,516	66.10%
65+	68,809	11.44%	564,896	10.02%
<b>Family Type</b>				
Families with children	45,921	40.74%	656,468	48.08%
<i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 3: Data Sources: Decennial Census; ACS. Note 4: China does not include Hong Kong and Taiwan. Note 5: Refer to the Data Documentation for details</i> <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> .				

share of non-Hispanic Blacks fell dramatically over that period, from over 65 percent of residents to just over 50 percent (see table 2). Meanwhile, the share of non-Hispanic Whites increased in that 20-year period by about 7 percentage points. The shares of Hispanics and non-Hispanic Asians or Pacific Islanders also went up, by about 4 points and 2.5 points respectively.

Regionally, the largest differences are for non-Hispanic Whites and Blacks. For instance, 48.82 percent of the metro area’s population is non-Hispanic White, 14 points higher than in D.C. And, the metro share of non-Hispanic Blacks is 25.14 percent, considerably lower than in D.C. The region is also more Hispanic (13.75% vs. 9.10%) and non-Hispanic Asian or Pacific Islander (9.19% vs. 3.50%) than D.C. The regional over-time trends differ considerably from what occurred in D.C. The metro area share of non-Hispanic Whites fell by over 15 percentage points between 1990 and 2010. By contrast, there was considerable regional growth in the Hispanic population, which added over 500,000 persons and moved from about 5.5 percent to almost 14 percent of residents. Similarly, the population of non-Hispanic Asian or Pacific Islanders more than doubled, adding over 381,000 residents. The regional share of non-Hispanic Blacks was static over those two decades.

### *National Origin*

The ten most frequently occurring countries of foreign-born national origin in the District of Columbia are, from most to least populous, El Salvador, Ethiopia, Mexico, Guatemala, Jamaica, China (excluding Hong Kong & Taiwan)<sup>6</sup>, India, Dominican Republic, Philippines, and Germany. El Salvadorian comprise the largest share of D.C.’s population, at 2.29 percent. Ethiopian-Americans are second, making up 0.84 percent of DC’s population.<sup>7</sup> Regionally, El Salvadorians (3.18%), Indians (1.52%), and Koreans (1.10%) comprise the top three highest shares of the metro area’s foreign-born population. Asians make up five of the top 10 most commonly occurring countries of national origin at the regional level, consistent with the higher overall share of non-Hispanic Asians and Pacific Islanders in the metro. The share of foreign-born residents has increased substantially between 1990 and 2010, both in D.C. and in the metro

<sup>6</sup> This exclusion originates in the HUD provided data.

<sup>7</sup> As of 2017, the top 3 most frequently occurring countries of foreign-born origin in the District of Columbia are El Salvador, Ethiopia, and Mexico (see Table 3).

region. Over that 20 year span, the share of foreign-born increased by about 3 percentage points in D.C., from 9.7% in 1990 to 12.64% as of 2010. The increase was even more pronounced in the metro area, going from 11.76% to 20.23% over that period.

<b>Table 2 – Demographic Trends, District Of Columbia and Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area</b>								
<b>District of Columbia</b>								
	<b>1990 Trend</b>		<b>2000 Trend</b>		<b>2010 Trend</b>		<b>Current</b>	
<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hisp.	166,031	27.35%	159,173	27.82%	209,464	34.81%	209,464	34.81%
Black, Non-Hisp.	395,115	65.10%	346,078	60.50%	308,617	51.29%	301,053	50.03%
Hispanic	32,617	5.37%	44,948	7.86%	54,749	9.10%	54,749	9.10%
Asian/Pacific Island, Non-Hisp.	10,646	1.75%	17,119	2.99%	25,154	4.18%	21,034	3.50%
Native American, Non-Hisp.	1,163	0.19%	1,838	0.32%	2,076	0.35%	1,322	0.22%
<b>National Origin</b>								
Foreign-born	58,887	9.70%	73,561	12.86%	76,058	12.64%	85,229	14.16%
<b>LEP</b>								
Limited English Proficiency	29,128	4.80%	38,236	6.68%	24,700	4.10%	28,095	4.67%
<b>Sex</b>								
Male	282,754	46.59%	268,827	46.99%	284,222	47.23%	284,222	47.23%
Female	324,146	53.41%	303,232	53.01%	317,501	52.77%	317,501	52.77%
<b>Age</b>								
Under 18	116,624	19.22%	118,388	20.70%	100,815	16.75%	100,815	16.75%
18-64	412,604	67.99%	383,583	67.05%	432,099	71.81%	432,099	71.81%
65+	77,672	12.80%	70,088	12.25%	68,809	11.44%	68,809	11.44%
<b>Family Type</b>								
Families with children	51,062	41.32%	47,906	42.73%	45,921	40.74%	45,921	40.74%
<b>Region</b>								
	<b>1990 Trend</b>		<b>2000 Trend</b>		<b>2010 Trend</b>		<b>Current</b>	
<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hisp.	2,661,215	64.00%	2,685,696	55.51%	2,751,393	48.82%	2,751,392	48.82%
Black, Non-Hisp.	1,052,256	25.31%	1,305,227	26.98%	1,485,407	26.35%	1,417,003	25.14%
Hispanic	227,030	5.46%	430,202	8.89%	775,180	13.75%	775,180	13.75%
Asian/Pacific Island, Non-Hisp.	198,814	4.78%	364,448	7.53%	580,366	10.30%	517,777	9.19%
Native American, Non-Hisp.	9,866	0.24%	21,614	0.45%	25,291	0.45%	12,428	0.22%
<b>National Origin</b>								
Foreign-born	488,904	11.76%	830,719	17.17%	1,140,161	20.23%	1,245,847	22.10%
<b>LEP</b>								
Limited English Proficiency	228,590	5.50%	408,948	8.45%	519,573	9.22%	540,755	9.59%
<b>Sex</b>								
Male	2,024,996	48.71%	2,351,426	48.61%	2,743,852	48.68%	2,743,852	48.68%
Female	2,132,418	51.29%	2,486,102	51.39%	2,892,380	51.32%	2,892,380	51.32%
<b>Age</b>								
Under 18	982,431	23.63%	1,250,968	25.86%	1,345,820	23.88%	1,345,820	23.88%
18-64	2,816,535	67.75%	3,152,500	65.17%	3,725,516	66.10%	3,725,516	66.10%
65+	358,448	8.62%	434,060	8.97%	564,896	10.02%	564,896	10.02%
<b>Family Type</b>								
Families with children	509,112	48.78%	387,838	49.75%	656,468	48.08%	656,468	48.08%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: Data Sources: Decennial Census; ACS. Note 3: Refer to the Data Documentation for details [www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation).

### *Limited English Proficiency*

Spanish is the most common language for D.C. residents with Limited English Proficiency (LEP), at 2.78 percent. African languages are the second-most frequently occurring in D.C. (0.55 percent), followed by various European and Asian languages to round out the top ten (see table 1). Spanish is also the most common LEP language regionally, at 5.31 percent. At both city and regional levels, the share of Spanish-speaking residents with LEP is greater than the combined shares of the next 9 most frequently occurring languages. Over time, there has not been much change in the share of the D.C. population that is LEP. The D.C. share actually declined from 4.8 percent in 1990 to 4.1 percent in 2010, a decrease of over 4,000 persons. By contrast, the share of persons with LEP increased drastically over that same period, from 5.5 percent in 1990 to 9.22 percent as of 2010. This represents an absolute increase of close to 300,000 residents in the region.

### *Disability*

The three most frequently occurring types of disabilities in D.C. are ambulatory (6.45%), cognitive (5.04%), and those that prohibit independent living (4.01%). These are followed by vision, self-care, and hearing, all at around 2% of the total population. Regionally, the top three disability types mirror those from D.C. However, in five of the six disability types the D.C. share is at least 0.50 of a percentage point higher than in the region, and this difference is greater than 1 point for ambulatory, cognitive, and independent living disabilities. Looking at 2013-7 5-Year ACS data, 11.7% of the total civilian non-institutionalized population in D.C. have a disability. This share is 8.5% for the region.

### *Sex*

In D.C., the share of residents that are females is 52.77% and the share of residents that are males is 47.23%. Regionally, the share of the population that is female is slightly lower, at 51.32%, and the share that is male is 48.68%. There has not been meaningful change in these shares over time, either at the D.C. or region levels.

### *Age*

D.C. has a significantly lower share of children (16.75%) than the region (23.88%) and a significantly higher share of working age adults (71.81% in D.C. versus 66.10% in the region). The share of elderly persons is about the same for D.C. and the surrounding metro. The number and share of children fell in D.C. in between 1990 and 2010, while the working age adult population increased. There was little change over time in these numbers regionally.

## Familial Status

Consistent with the lower share of children in the overall D.C. population, a considerably lower share of D.C. households consists of families with children (40.74%) as compared to the region (48.08%). There has been little change in these shares from 1990 to 2010, either for D.C. or the metro area.

<b>Table 3 – Demographics using 2013-17 ACS 5-year estimates</b>						
<b>District of Columbia and Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area</b>						
	<b>District Of Columbia</b>			<b>Region</b>		
<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>	
White, Non-Hisp.	241,901	35.98%		2,818,715	46.28%	
Black, Non-Hisp.	315,159	46.87%		1,514,907	24.87%	
Hispanic	71,829	10.68%		930,161	15.27%	
Asian/Pacific Island, Non-Hisp.	25,304	3.76%		604,618	9.93%	
Native American, Non-Hisp.	1,140	0.17%		11,637	0.19%	
Two or More Races, Non-Hisp.	14,864	2.21%		189,199	3.11%	
Other, Non-Hisp.	2,194	0.33%		20,959	0.34%	
<b>National Origin</b>						
#1 country of origin	El Salvador	11,776	1.75%	El Salvador	187,452	3.08%
#2 country of origin	Ethiopia	5,699	0.85%	India	96,480	1.58%
#3 country of origin	Mexico	4,117	0.61%	Korea	61,306	1.01%
#4 country of origin	China	3,690	0.55%	China	55,000	0.90%
#5 country of origin	Guatemala	3,241	0.48%	Ethiopia	48,704	0.80%
#6 country of origin	Jamaica	2,822	0.42%	Vietnam	48,483	0.80%
#7 country of origin	India	2,722	0.40%	Mexico	48,274	0.79%
#8 country of origin	France	2,417	0.36%	Philippines	47,996	0.79%
#9 country of origin	Dominican Rep.	2,220	0.33%	Guatemala	47,581	0.78%
#10 country of origin	Colombia	2,133	0.32%	Honduras	39,754	0.65%
<b>Sex</b>						
Male	319,046	47.45%		2,975,354	48.85%	
Female	353,345	52.55%		3,114,842	51.15%	
<b>Age</b>						
Under 18	118,058	17.56%		1,411,310	23.17%	
18-64	474,564	70.58%		3,955,602	64.95%	
65+	79,769	11.86%		723,284	11.88%	
<b>Family Type</b>						
Families with children	51,248	42.21%		672,194	46.87%	
<p><i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 3: Data Sources: ACS. Note 4: China does not include Hong Kong and Taiwan. Note 5: LEP data were not available at the tract level for 2017. Note 6: Disability data did not include comparable age categories in 2017, and are thus excluded in this table. Note 7: Refer to the Data Documentation for details <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>.</i></p>						

## B. General Issues

### i. Segregation and Integration

This portion of the analysis examines racial concentration and cross-racial exposures and trends over time, as well as concentrations of renter and owner-occupied housing. Historically, D.C. has been highly segregated by race and income, with the legacy of restrictive covenants and redlining still felt in the present. Today, D.C. has very high rates of ethnic and racial segregation, with clearly defined spatial patterns. A number of the causes of this segregation are described in the “contributing factors” part of this section.

#### Analysis

*Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

D.C. has very high rates of ethnic and racial segregation. Patterns of segregation are clearly spatially defined. Generally, portions of the upper Northwest quadrant as well as neighborhoods east of the Anacostia River have the highest rates of segregation by race and ethnicity.

One common metric used to determine levels of residential segregation between groups is the “dissimilarity index.” The index shows the degree to which two groups are evenly distributed across a geographic area and measures the percentage of a certain group’s population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the dissimilarity index, the more uneven the population of different groups is to each other. For example, if a Black/White dissimilarity index is 65, then 65 percent of Black residents would need to move in order for Blacks and Whites to be evenly distributed across the city. A dissimilarity index of less than 40 is considered low, 40 to 55 is moderate, and values over 55 are considered high.

**Table 1 - Racial/Ethnic Dissimilarity Trends**

Racial/Ethnic Dissimilarity	District Of Columbia				Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	73.13	73.10	63.26	66.20	52.18	49.30	46.74	50.29
Black/White	77.94	79.82	72.18	74.51	65.07	62.72	60.82	64.08
Hispanic/White	50.37	59.31	49.07	50.97	41.83	47.54	48.29	50.69
Asian or Pacific Islander/White	25.00	25.58	17.93	23.81	34.83	37.66	37.32	41.96

*Note 1: Data Sources: Decennial Census. Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).*

In D.C., Black/White segregation is especially high. As measured by the dissimilarity index, Black residents experience by far the highest levels of segregation of any racial or ethnic group within D.C. as well as in the region (see table 1). Hispanic residents experience moderate levels of segregation in D.C. and the region. Asian American and Pacific Islander residents face relatively low levels of segregation within D.C., which may be due to lower proportions of Asian

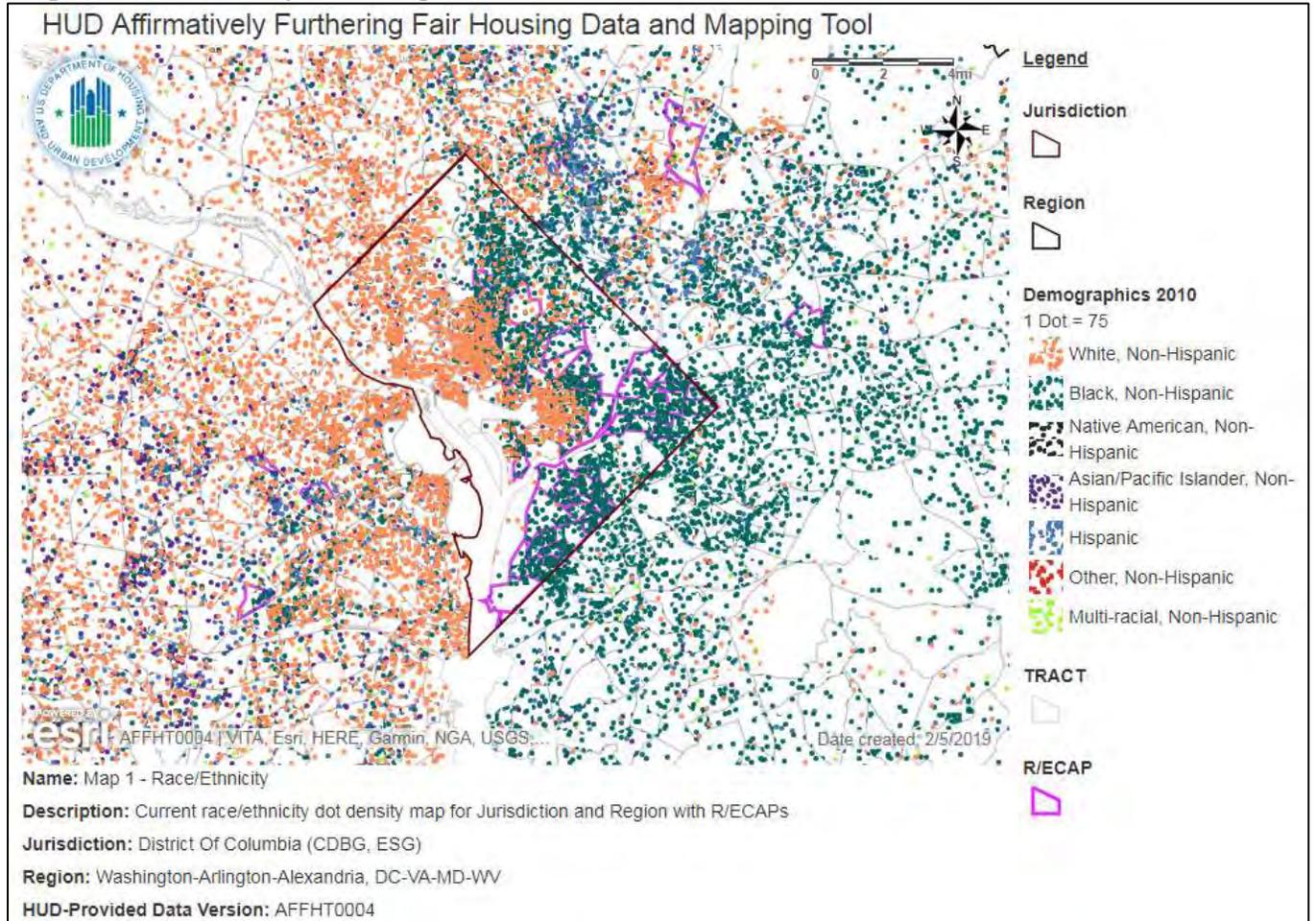
and Pacific Islander residents compared to the region. Asian American and Pacific Islanders experience significantly higher levels of segregation in the region as a whole than within D.C.

In the region, there is significant segregation by ethnicity and race. On a broad level, there is a stark difference between the demographics of the eastern and western portions of the region. Within D.C., Black and, to a lesser extent, Hispanic residents largely live in areas east of 16<sup>th</sup> Street NW. Non-Hispanic White and Asian residents are largely concentrated in the western portions of D.C. Outside of D.C., there is an east-west divide as well. Black residents are concentrated in Prince George's County while Non-Hispanic White and Asian American residents are concentrated in Montgomery County and Northern Virginia. Hispanic residents are more evenly distributed throughout the region.

Overall, these results point to serious black/white segregation both in D.C. and (while a bit lower) in the region overall. See below for discussion of contributing factors that may account for these results.

*Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*

Map 1: Race/Ethnicity, Washington, DC



Within D.C., there are many neighborhoods with high levels of segregation. Neighborhoods located east of the Anacostia River as well as those to the west of Rock Creek Park generally have some of the highest levels of racial segregation in the city.

Black residents are heavily concentrated in the eastern neighborhoods of D.C., especially in Ward 7 and in Ward 8. Relatively few Black residents live west of 16<sup>th</sup> Street NW while nearly every census tract that lies east of the Anacostia River has an overwhelmingly Black population. Most of the District of Columbia's R/ECAPs are also located east of the Anacostia River. In addition, there are many neighborhoods in Ward 5 that are predominantly Black, such as Ivy City and Michigan Park. Northern portions located in Ward 4 such as Crestwood and Manor Park also have very high concentrations of Black residents. In addition, there is a relatively high number of Black residents in portions of the southwest quadrant bordering South Capitol Street and in Kingman Park in Ward 6.

In contrast, non-Hispanic White residents are concentrated in the western parts of D.C., generally to the west of 16<sup>th</sup> Street NW. Neighborhoods that lie west of Rock Creek Park in Ward 3 such

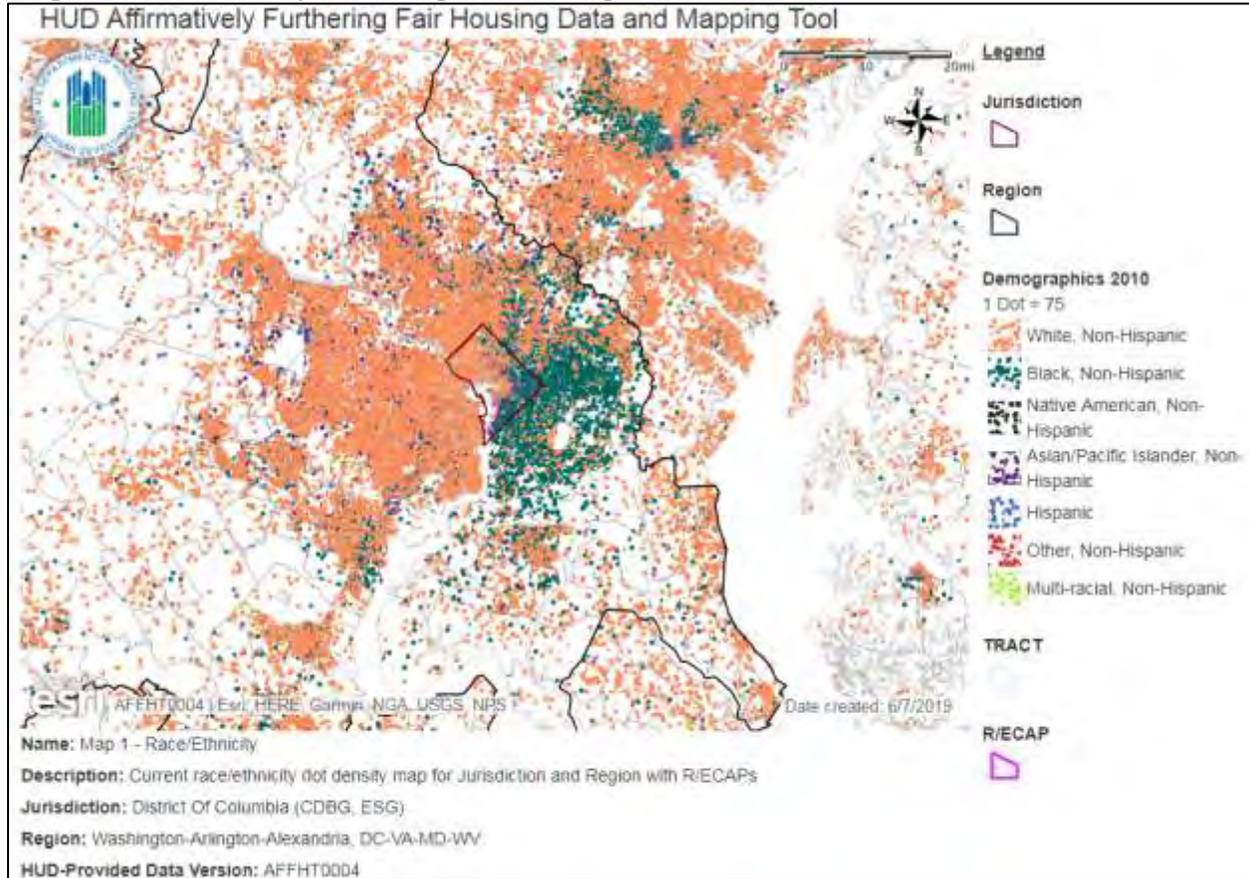
as Cleveland Park, Woodley Park, and Van Ness are predominantly White. Other upper Northwest neighborhoods including The Palisades, Spring Valley, and Chevy Chase are all highly segregated with a predominantly White population. Kalorama, Dupont Circle, Penn Quarter, and portions of the Logan Circle area are also segregated with a high concentration of Non-Hispanic White residents. Outside of Northwest, Non-Hispanic White residents are concentrated in the Navy Yard neighborhood and in Capitol Hill, which is one of the largest neighborhoods in D.C.

Hispanic residents are generally concentrated in the central and northern parts of the District of Columbia, especially in the neighborhoods of Mount Pleasant, Adams Morgan, Columbia Heights, Park View, Brightwood, and Brightwood Park. There is also a concentration of Hispanic residents near Logan Circle. Asian residents are generally concentrated in the central and western neighborhoods of the District of Columbia with high concentrations in Van Ness, Chinatown, Mount Vernon Triangle, Dupont Circle, Logan Circle, and Foggy Bottom.

Relatively integrated neighborhoods by race and ethnicity are generally located in central neighborhoods closer to Downtown. Several census tracts in the Logan Circle neighborhood between Rhode Island Avenue NW and Massachusetts Avenue NW are relatively integrated. There are also fairly integrated census tracts in Judiciary Square, census tracts immediately to the east of the Washington Convention Center and north of New York Avenue NW in the Mount Vernon Triangle area, and in Bloomingdale. In addition, there is relatively high integration in several census tracts along the U Street Corridor and in Shaw south of Florida Avenue NW. Columbia Heights and Adams Morgan are two of the most diverse neighborhoods in the District of Columbia with large shares of Non-Hispanic White, Hispanic, and Black residents. Most of the Southwest waterfront area is also generally integrated with large shares of Non-Hispanic White and Black residents. Several census tracts that are to the east of Lincoln Park and west of RFK stadium are relatively integrated. In Northeast, the H Street Corridor, Brookland, and Takoma are relatively integrated area with substantial shares of Black and Non-Hispanic White residents.

*Region – Segregation by Race and Ethnicity*

**Map 2: Race/Ethnicity, Washington, DC Region**



In the region, there are also many areas that are relatively segregated by race and ethnicity. There are areas of significant Hispanic concentration in Langley Park, Hyattsville, and Beltsville in northern Prince George’s County and in Gaithersburg, Wheaton, and Aspen Hill in Montgomery County. In Virginia, Hispanic residents are concentrated in western sections of the City of Alexandria and South Arlington. In Fairfax County, there are also areas of Hispanic concentration in Annandale, the Route 1 corridor in southern Fairfax County, Seven Corners, and Herndon. There are also areas of Hispanic concentration in Dale City and Woodbridge in Prince William County, the cities of Manassas and Manassas Park, and in Sterling in Loudoun County.

Black residents are generally concentrated in the eastern portion of the region. Communities in Prince George’s County that border the southeast quadrant of the District of Columbia have some of the highest concentrations of Black residents in the region. There are also significant concentrations of Black residents throughout Prince George’s County, northern Charles County, and in Aspen Hill, Silver Spring, and Gaithersburg in Montgomery County. In Virginia, there are significant concentrations of Black residents in South Arlington, the western section of the City of Alexandria, Southern Fairfax County, eastern Prince William County, and in the cities of Manassas and Manassas Park.

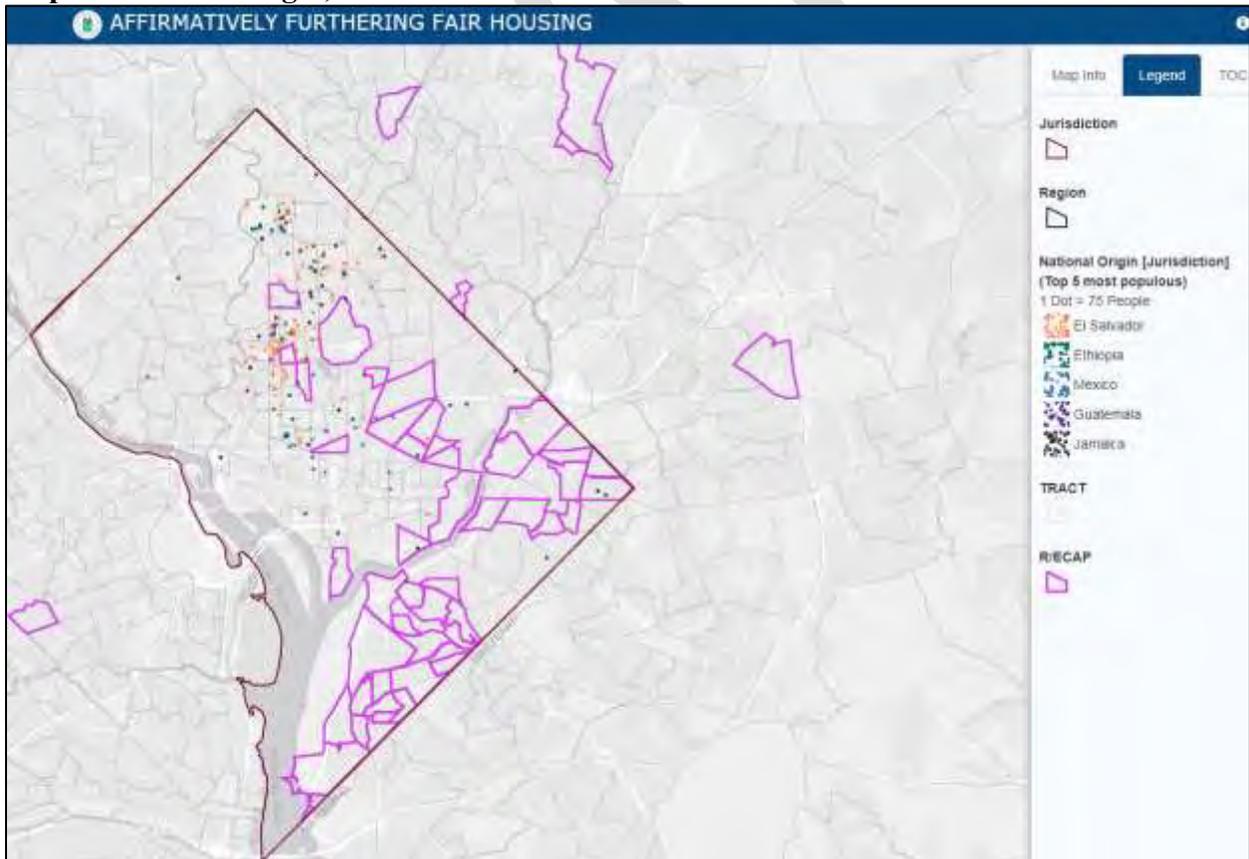
There are significant concentrations of Non-Hispanic White residents in northern and western Montgomery County and in Bethesda, Chevy Chase, and Potomac. In Prince George’s County, there is a significant concentration of Non-Hispanic White residents in College Park. In Virginia, Old Town Alexandria is disproportionately Non-Hispanic White. There are also significant concentrations of Non-Hispanic White residents in North Arlington; in Northern Fairfax County communities such as McLean and Great Falls; and in western Loudoun County.

Asian residents are generally concentrated in the western part of the region. There is a high concentration of Asian residents in Rockville, Gaithersburg, and Germantown in Montgomery County. In Virginia, there are significant concentrations of Asian residents in North Arlington, the City of Fairfax, Tysons Corner, Centreville, Annandale, Chantilly, Herndon, Burke, and Springfield. There are also high concentrations of Asian residents in eastern Loudoun County as well as in Gainesville in Prince William County.

Relatively well integrated areas include Beltsville, Bowie, Mount Rainier, Silver Spring, Rockville, Gaithersburg, and Montgomery Village in Maryland. Many communities in Fairfax County such as Reston and Burke as well as Sterling in Eastern Loudoun County are relatively integrated among Hispanic, Asian, and Non-Hispanic White residents.

### *DC – Segregation by National Origin*

**Map 3: National Origin, DC**



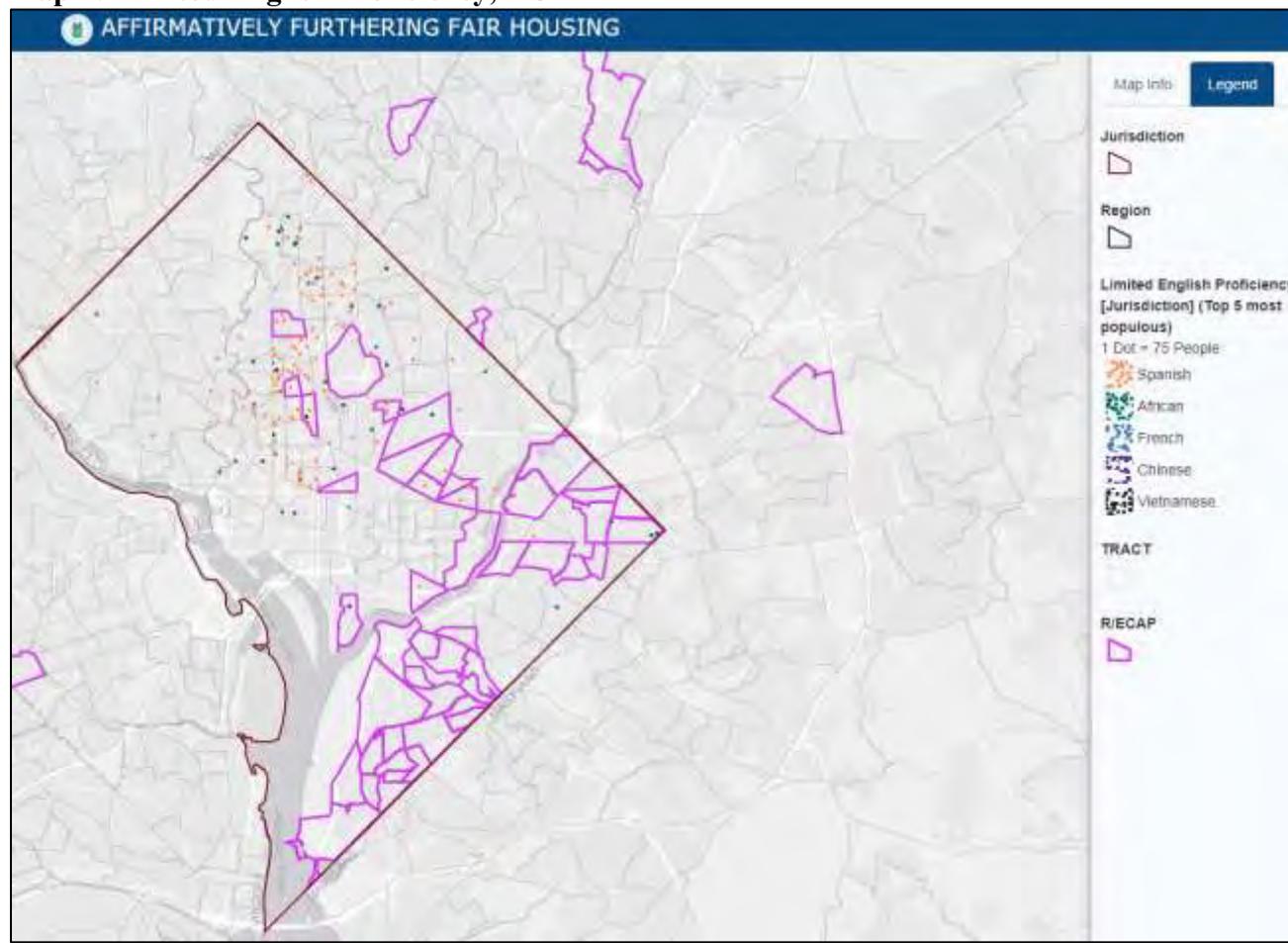
In terms of national origin, foreign-born individuals are concentrated in the central and northern neighborhoods of D.C. There is a significant population of Salvadoran born residents in Columbia Heights, Mount Pleasant, Adams Morgan, Park View, Petworth, Sixteenth Street Heights, Brightwood Park, and Brightwood. There is a significant concentration of individuals of Ethiopian national origin in Brightwood with smaller concentrations in Columbia Heights and along the U Street Corridor. There is a concentration of Mexican national origin in Columbia Heights and Brightwood Park. Individuals of Guatemalan national origin are concentrated in Logan Circle, Shaw, and Columbia Heights. Individuals of Jamaican national origin are concentrated in Brightwood and Brightwood Park.

### *Region – Segregation by National Origin*

As discussed in the demographic summary, the top 5 countries of origin for foreign-born individuals in the region are El Salvador, India, Korea, Mexico, and China. There are concentrations of individuals of Salvadoran national origin in Langley Park, Hyattsville, Wheaton, Aspen Hill, Silver Spring, Montgomery Village, and Gaithersburg in Maryland. In Virginia, there are concentrations of Salvadoran national origin in Dale City, Woodbridge, Manassas, Manassas Park, Sterling, Herndon, Annandale, Springfield, Southern Fairfax County, South Arlington, Wheaton, and Gaithersburg. Significant concentrations of Indian national origin exist in Sterling, Herndon, Centreville, Ashburn, South Riding, Potomac, and Gaithersburg. There are significant concentrations of Korean national origin in Centreville, Chantilly, Fairfax, McLean, Annandale, Burke, Lorton, Rockville, and Gaithersburg. High concentrations of Mexican national origin exist in Langley Park, Hyattsville, Gaithersburg, Aspen Hill, Wheaton, Bailey's Crossroads, Alexandria, Manassas, and Woodbridge. High concentrations of Chinese origin exist in Darnestown, Rockville, Gaithersburg, Germantown, North Potomac, Potomac, Merrifield, and Fairfax.

## DC – Segregation of LEP Individuals

**Map 4: Limited English Proficiency, DC**



Spanish speakers comprise the largest group of LEP individuals in the District of Columbia followed by speakers of African Languages, French, Chinese, and Vietnamese. Spanish speakers are concentrated in Columbia Heights, Adams Morgan, Mount Pleasant, Logan Circle, Petworth, and Brightwood. Speakers of African languages are concentrated in Columbia Heights, Brightwood, and in Northeast near the intersection of Eastern and Southern Avenues. The largest concentrations of French speakers are in Takoma, Shepherd Park, and Brookland. Chinese speakers are concentrated in the central part of the District of Columbia in Chinatown, Penn Quarter, and Foggy Bottom. Vietnamese speakers are concentrated in the central portions of the District of Columbia.

## Region – Segregation of LEP Individuals

In the region, LEP individuals most commonly speak Spanish, Chinese, Korean, Vietnamese, and African languages. In Maryland, Spanish-speaking individuals are concentrated in Northern Prince George's County communities including Hyattsville, College Park, and Langley Park and the Montgomery County communities of Gaithersburg and Montgomery Village, White Oak,

and Aspen Hill. In Virginia, Spanish-speakers are concentrated in eastern Prince William County, Manassas and Manassas Park, western Fairfax County, eastern Loudoun County, South Arlington, Alexandria, Annandale, Bailey's Crossroads, Seven Corners, and southern Fairfax County. Speakers of Chinese are concentrated in North Potomac, Rockville, and Gaithersburg. Korean speakers are concentrated in Fairfax, Centreville, Annandale, Burke, and Lorton. Vietnamese speakers are concentrated in Annandale, Falls Church, Bailey's Crossroads, and Seven Corners. Speakers of African languages are concentrated in Silver Spring and Wheaton.

*Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).*

Historically, D.C. and the region have been highly segregated by race and income. D.C. has a disproportionately large low-income Black population when compared to the United States and the region due partly to white flight from the city in the second half of the 20<sup>th</sup> century as well as the departure of many middle-class Black families in the 1970s.<sup>8</sup> Black residents formed a majority of D.C.'s population for decades until 2011 and still make up a plurality of all residents.

D.C. has experienced tremendous population growth in recent years. After years of decline, the population of D.C. has grown by over 120,000 residents since 2000. An influx of White residents as well as Hispanics and Asians have helped to integrate areas that were once predominantly Black. However, residential segregation remains entrenched across much of the city. Overall levels of non-White/White segregation declined between 1990 and 2010 but may have risen since 2010. Levels of Black/White segregation and Asian or Pacific Islander/White segregation also declined between 1990 and 2010 (but may have risen since 2010). However, Black/White segregation remains extremely high. In the region, Non-White/White segregation has declined modestly since 1990, with Black/White segregation falling while Hispanic/White segregation increased over that period.

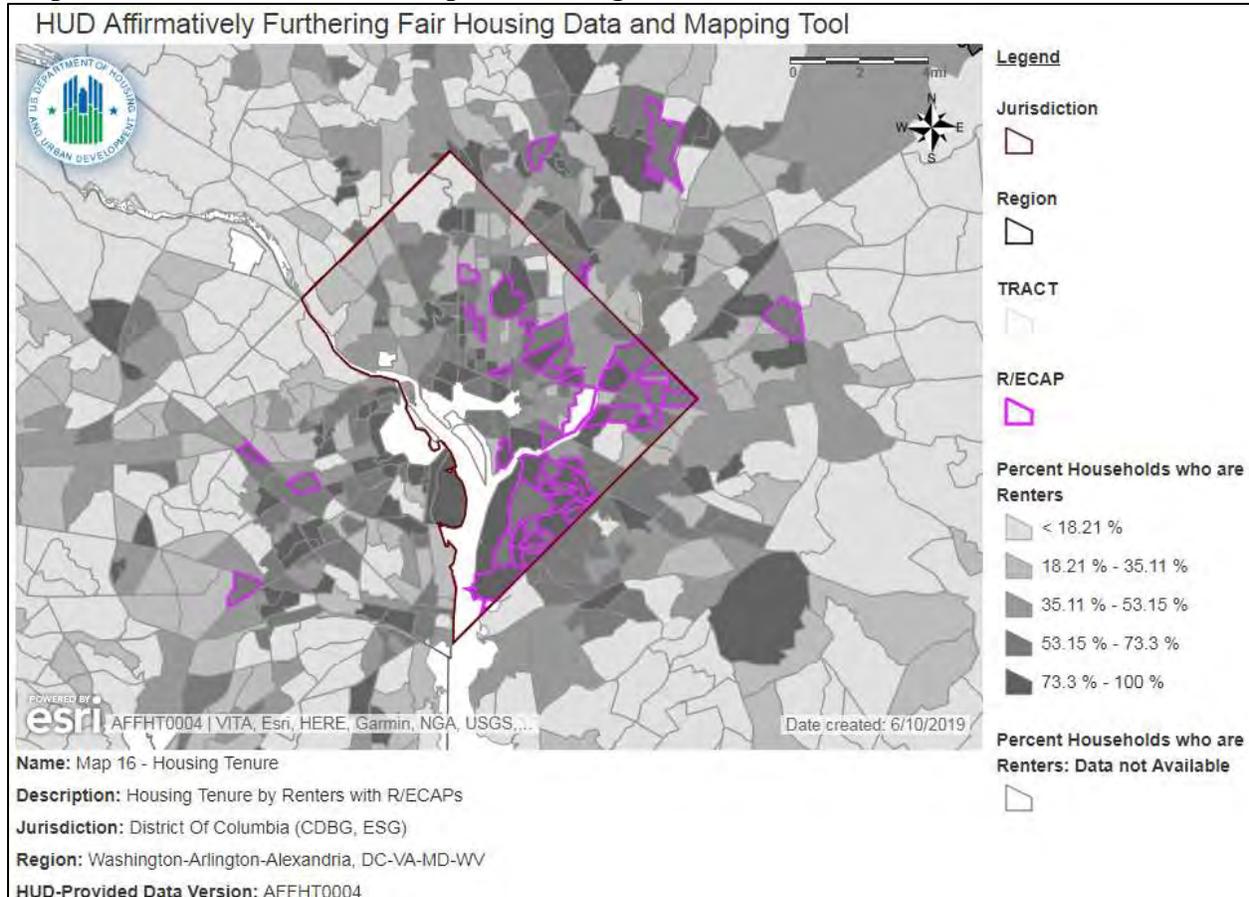
Despite the large demographic changes in D.C., geographic patterns of segregation are largely the same as they were in 1990, with White residents concentrated in the west and Black residents concentrated in the east. There has been increased integration in central neighborhoods that have experienced gentrification such as Logan Circle, Bloomingdale, Columbia Heights and Shaw. Additionally, there has been increased integration since 2000 in some neighborhoods experiencing large new residential development activity such as NoMa and the H Street Corridor. In Navy Yard, massive redevelopment has helped transform the neighborhood from predominantly Black to predominantly Non-Hispanic White. Regionally, the racial divide between the eastern and western portions of the region has largely remained the same even as the region has become substantially more racially and ethnically diverse since 1990, due in part to a dramatic increase in the Hispanic and Asian populations in the Maryland and Northern Virginia suburbs. However, the concentration of Black residents in Prince George's County has increased and many Hispanic and Asian residents have formed new relatively segregated enclaves. New R/ECAPs have also emerged in Prince George's County, Fairfax County, and Montgomery County since 1990.

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<sup>8</sup> Kathryn Zickuhr, Discriminatory Housing Practices in the District: A Brief history, <https://www.dcpolicycenter.org/publications/discriminatory-housing-practices-in-the-district-a-brief-history/>

Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

**Map 5: Location of Renter Occupied Housing**



In D.C., approximately 57% of households rent rather than own their homes. Renter occupied housing tends to be concentrated in neighborhoods closer to Downtown that have high population density and many rental housing options. These include areas such as Foggy Bottom, Penn Quarter, Navy Yard, Columbia Heights, and Shaw as well as some neighborhoods that lie along the major thoroughfares of Wisconsin, Massachusetts, and Connecticut Avenues NW. Other neighborhoods with relatively high rates of renter occupied housing include Ivy City, Carver-Langston, and Brightwood. There is also a notable concentration of census tracts with very high rates of renter occupied housing in portions of the southeast quadrant of D.C. such as Anacostia and Garfield Heights that are east of the Anacostia River and are some of the most racially segregated neighborhoods in the city. While there is a substantial amount of renter occupied housing located in R/ECAPs and other segregated areas, there is also a high concentration of renters in some of the most integrated neighborhoods in D.C.

## Map 6: Location of Owner Occupied Housing



Owner occupied housing is most prevalent in less dense areas further away from Downtown. The majority of census tracts in west of Rock Creek Park, in the upper northwest quadrant of D.C. have very high homeownership rates. The Northeast quadrant also has high rates of owner-occupied housing concentrated in neighborhoods like Woodridge and Michigan Park. Other neighborhoods close to the Northeast border of the District such as Manor Park, Crestwood, Shepherd Park, and Sixteenth Street Heights also have high rates of home ownership. Capitol Hill and Fort Dupont are also notable for being neighborhoods with a high concentration of home owners. Owner-occupied housing tends to be located in both predominantly Black neighborhoods as well as predominantly White neighborhoods.

*Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies or practices.*

Population growth and gentrification in D.C. are significant forces that could lead to higher segregation in the future. Although population growth is slowing down from the rapid pace seen

in much of the past decade<sup>9</sup>, the effects of such growth and gentrification continue to be a concern. Due to a variety of factors, recent residential development activity has been concentrated in certain neighborhoods where it is easier to build new units. These neighborhoods include Navy Yard, NoMa and the Southwest Waterfront. Demographic change is likely to be especially rapid in these neighborhoods and residential segregation could increase there. Neighborhoods that are experiencing gentrification and are currently relatively integrated could become segregated in the future as residents of color become displaced.

As more affluent residents continue to move into the city, lower-income residents face increased housing pressure and may be displaced to neighborhoods in the eastern portions of the city as well as to suburban communities, particularly in Prince George's County, that have more affordable housing.

## **Additional Information**

### Historical Overview

Many of the fair housing issues discussed in this document have roots in decades-old policies and government actions, as well as those of the private sector. Racial segregation in DC stretches back beyond the last century, institutionalized through courts, property deeds, and government policies. The Great Migration in the latter half of the 19<sup>th</sup> century brought an influx of Black Southerners seeking education and employment opportunities in Northern cities, including D.C. D.C.'s old city was largely built up by this time, and officials began looking north to the rural area beyond the former boundary at Florida Avenue.<sup>10</sup>

Developers had enormous sway in shaping the physical landscape at this time, since the advent of municipal zoning did not begin until the 1920s. As new neighborhoods were being built in the northern parts of DC, developers often sought to control the makeup of new neighborhoods by including covenants, or agreements, in deeds for properties they sold.<sup>11</sup> Besides commonplace requirements such as distance from the street or excluding multi-family homes, covenants could also prohibit a property's sale to certain groups—most often, African Americans. Beginning with new developments in Northwest neighborhoods, including Brightwood and Petworth, developers were able to build up restrictive blocks, property by property.<sup>12</sup>

In the early 20<sup>th</sup> century, another form of racially restrictive covenants began gaining popularity. Neighborhood associations would create petitions, gathering signatures from residents, to put covenants on the properties of every signer. This effectively restricted entire blocks and neighborhoods, and were filed with the Recorder of Deeds as legal contracts.<sup>13</sup> This was a more efficient tool of segregation than restrictions by deed—gathering signatures did not rely on the development of new properties and instead allowed these covenants to apply to existing ones.

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<sup>9</sup> <https://wamu.org/story/19/01/30/the-reason-d-c-s-once-dramatic-population-growth-is-slowing-down-and-why-thats-not-so-bad/>

<sup>10</sup> Mapping Segregation in Washington DC. How Racially Restricted Housing Shaped Ward 4. Prologue DC, 2019.

<sup>11</sup> Mapping Segregation in Washington DC. Legal Challenges to Racially Restrictive Covenants. Prologue DC, 2019.

<sup>12</sup> Legal Challenges to Racially Restrictive Covenants.

<sup>13</sup> Legal Challenges to Racially Restrictive Covenants.

After the 1923 case *Corrigan v. Buckley*, which upheld the use of covenants, their use spread quickly across D.C.<sup>14</sup> Covenants continued to shape the racial landscape of D.C. until the landmark *Shelley v. Kraemer* ruling in 1948, which held that they could not be enforced by the courts.

Even beyond covenants, housing segregation remained relevant through other forms. The government built racially segregated dormitories and family housing for the rapidly expanding federal workforce in the 1940s.<sup>15</sup> New public housing was restricted by race, and advertisements for housing used coded language to exclude Blacks from buying or renting.<sup>16</sup>

The area east of the Anacostia River, now known as Wards 7 and 8, was originally developed as a suburb for working class whites, with covenants in place to keep out African Americans. Today, the makeup of Wards 7 and 8 is nearly 94% Black.<sup>17</sup> The flight of white residents and subsequent hyper-segregation in this area is not accidental. White residents began leaving the neighborhood in the mid-20<sup>th</sup> century, flocking to new suburbs in Virginia and Maryland and enclaves west of Rock Creek Park. In 1952, officials decided to begin an urban renewal project in Southwest D.C., with the stated objective of eliminating slums and improving conditions for residents who lived there.<sup>18</sup> Residents contested the use of eminent domain, but the Supreme Court upheld the government's authority, and moved forward with possession of the land, homes, and buildings in Southwest.<sup>19</sup> 560 acres were bulldozed, and 6,000 homes were razed. Approximately 23,000 residents, a majority of whom were Black, were displaced without comprehensive relocation assistance.<sup>20</sup> Residents were forced into Wards 7 and 8, and obstructions to fair housing were created as a means to keep them in those areas.<sup>21</sup> For example, the construction of Interstates I-495 and I-295 in the early 1960s cut off many Ward 7 and 8 neighborhoods from the Anacostia River and the rest of the city, effectively isolating residents from accessibility to jobs.<sup>22</sup> Additionally, in time, 5800 new homes replaced the former buildings in Southwest DC, but they were inhabited by 13,000 middle- and upper-middle class residents. Only 310 units were designated for moderate-income families, and only one apartment complex was designated for low-income families.<sup>23</sup> These kinds of decisions perpetuated the existing racial lines in D.C. and ensured more obstacles in achieving integration.

Today, the continuing legacy of deliberate segregation and discrimination remains a powerful force that contributes to residential patterns in the city and region. Overcoming this legacy will

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<sup>14</sup> Legal Challenges to Racially Restrictive Covenants.

<sup>15</sup> How Racially Restricted Housing Shaped Ward 4.

<sup>16</sup> How Racially Restricted Housing Shaped Ward 4.

<sup>17</sup> Brief for Howard University School of Law Fair Housing Clinic and Civil Rights Clinic as Amicus Curiae, ICP v. Texas Department of Housing and Community Affairs, 135 S.Ct. 2507 (2015).

<sup>18</sup> Kilolo Kijazaki, Rachel Marie Brooks Atkins, Mark Paul, Anne E. Price, Darrick Hamilton, and William A. Darity Jr. *The Color of Wealth in the Nation's Capital*. The Urban Institute: 2016.

<sup>19</sup> Kijazaki, et al.

<sup>20</sup> Kijazaki, et al.

<sup>21</sup> Brief for Howard University School of Law Fair Housing Clinic and Civil Rights Clinic as Amicus Curiae, ICP v. Texas Department of Housing and Community Affairs, 135 S.Ct. 2507 (2015).

<sup>22</sup> Brief for Howard University School of Law Fair Housing Clinic and Civil Rights Clinic as Amicus Curiae, ICP v. Texas Department of Housing and Community Affairs, 135 S.Ct. 2507 (2015), pg. 6-7

<sup>23</sup> [https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital\\_8.pdf](https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital_8.pdf), 25

require deliberate efforts to understand and overcome the ways that it is perpetuated today. In addition, as detailed in the “contributing factors” throughout this document, modern-day policies play a significant role in creating and maintaining segregation and inequality – and can be better designed in order to address these problems.

DRAFT

## ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are geographic areas with significant concentrations of poverty and minority populations.<sup>24</sup> HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower.<sup>25</sup>

Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas.<sup>26</sup> Research has found that racial inequality is thus amplified by residential segregation.<sup>27</sup> Concentrated poverty is also associated with higher crime rates and worse health outcomes.<sup>28</sup> However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers.<sup>29</sup> Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes.<sup>30</sup> Overall, identifying R/ECAPs facilitates understanding of entrenched patterns of segregation and poverty.

### Analysis

*Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.*

Out of the 179 tracts in D.C., 46 are R/ECAPs (25.6%) as of 2013. R/ECAPs are especially located in D.C.'s northeast and southeast quadrants, coinciding with wards 5, 6, 7, and 8. The majority of D.C.'s R/ECAPs are located to the east of the Anacostia River in Wards 7 and 8 (see

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<sup>24</sup> Office of the Secretary, HUD, *Affirmatively Furthering Fair Housing, Sections 5.160 through 5.180 appear at 80 FR 42363*, July 2015, <https://www.gpo.gov/fdsys/pkg/CFR-2016-title24-vol1/pdf/CFR-2016-title24-vol1-sec5-152.pdf>.

<sup>25</sup> U.S. Department of Housing and Urban Development, HUD Open Data for R/ECAP Tract Current and Historic, [https://egis-hud.opendata.arcgis.com/datasets/320b8ab5d0304daaa7f1b8c03ff01256\\_0](https://egis-hud.opendata.arcgis.com/datasets/320b8ab5d0304daaa7f1b8c03ff01256_0).

<sup>26</sup> National Bureau of Economic Research, *Where is the Land of Opportunity? The Geography of Intergenerational Mobility in the United States*, January 2014, <http://www.nber.org/papers/w19843.pdf>.

<sup>27</sup> Raj Chetty & Nathaniel Hendren, *The Impacts of Neighborhoods on Intergenerational Mobility: Childhood Exposure Effects and County-Level Estimates*, HARVARD UNIVERSITY AND NBER (May 2015), [http://www.equality-of-opportunity.org/images/nbhds\\_paper.pdf](http://www.equality-of-opportunity.org/images/nbhds_paper.pdf); Raj Chetty & Nathaniel Hendren, *The Impacts of Neighborhoods on Intergenerational Mobility II: County-Level Estimates*, STANFORD UNIVERSITY, HARVARD UNIVERSITY, AND NBER (Dec. 2017), [http://www.equality-of-opportunity.org/assets/documents/movers\\_paper2.pdf](http://www.equality-of-opportunity.org/assets/documents/movers_paper2.pdf).

<sup>28</sup> Brookings Institute, *The Re-Emergence of Concentrated Poverty: Metropolitan Trends in the 2000s*, November 2011, <https://www.brookings.edu/research/the-re-emergence-of-concentrated-poverty-metropolitan-trends-in-the-2000s/>.

<sup>29</sup> Center for the Study of Immigrant Integration, *Root Races: Latino Engagement, Place Identities, and Shared Futures in South Los Angeles*, October 2016, [https://dornsife.usc.edu/assets/sites/731/docs/RootsRaices\\_Full\\_Report\\_CSII\\_USC\\_Final2016\\_Web\\_Small.pdf](https://dornsife.usc.edu/assets/sites/731/docs/RootsRaices_Full_Report_CSII_USC_Final2016_Web_Small.pdf).

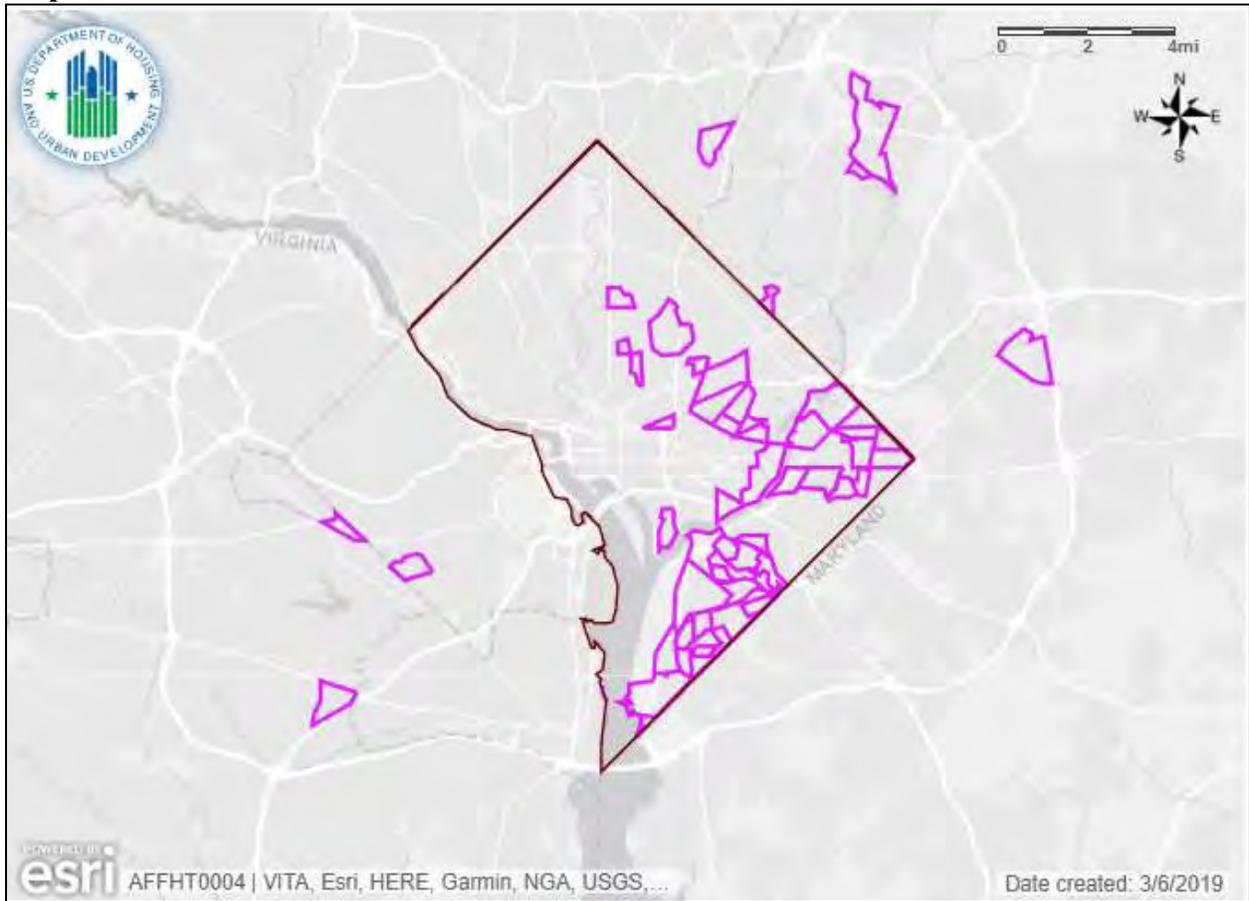
<sup>30</sup> Journal of Environmental Psychology, *Creating a Sense of Place: The Vietnamese-American and Little Saigon, 2000*, [http://users.clas.ufl.edu/msscha/landarch/readings/res\\_report\\_qual\\_creating\\_sense\\_place.pdf](http://users.clas.ufl.edu/msscha/landarch/readings/res_report_qual_creating_sense_place.pdf).

Map 1 for R/ECAPs and Map 3 for Wards<sup>31</sup>). Most neighborhoods in Ward 8 are R/ECAPs, especially those lying to the east of Bolling Air Force Base and to the west of Good Hope Road SE. Similarly, many neighborhoods in Ward 7 are also R/ECAPs, especially in neighborhoods bordering East Capitol Street SE to the immediate north and south. Elsewhere, several neighborhoods to the west of the National Arboretum also are R/ECAPs, including Carver Langston, Trinidad, and Ivy City. Several neighborhoods to the north of Columbia Rd NW and east of 16<sup>th</sup> Street NW are also R/ECAPs, including what looks to be part of Sixteenth Street Heights. Regionally, there are 56 total R/ECAPs of which 46 are in D.C. Most of the 10 regional R/ECAPs outside of D.C. are within the Capital Beltway and in close proximity to the city. The most distant R/ECAPs include several in Gaithersburg MD and Reston Virginia. Overall, of the 10 R/ECAPs, 3 are in Montgomery County MD, 3 are in Prince George's County MD, 1 is in Arlington County VA, and 3 are in Fairfax County VA. While there is some evidence of the suburbanization of racialized poverty, R/ECAPs are primarily located in specific neighborhoods within the D.C., and as such their harmful effects are also acutely concentrated in those same neighborhoods. Reasons for this overconcentration of R/ECAPs in the District of Columbia are explored below (see "Contributing Factors").

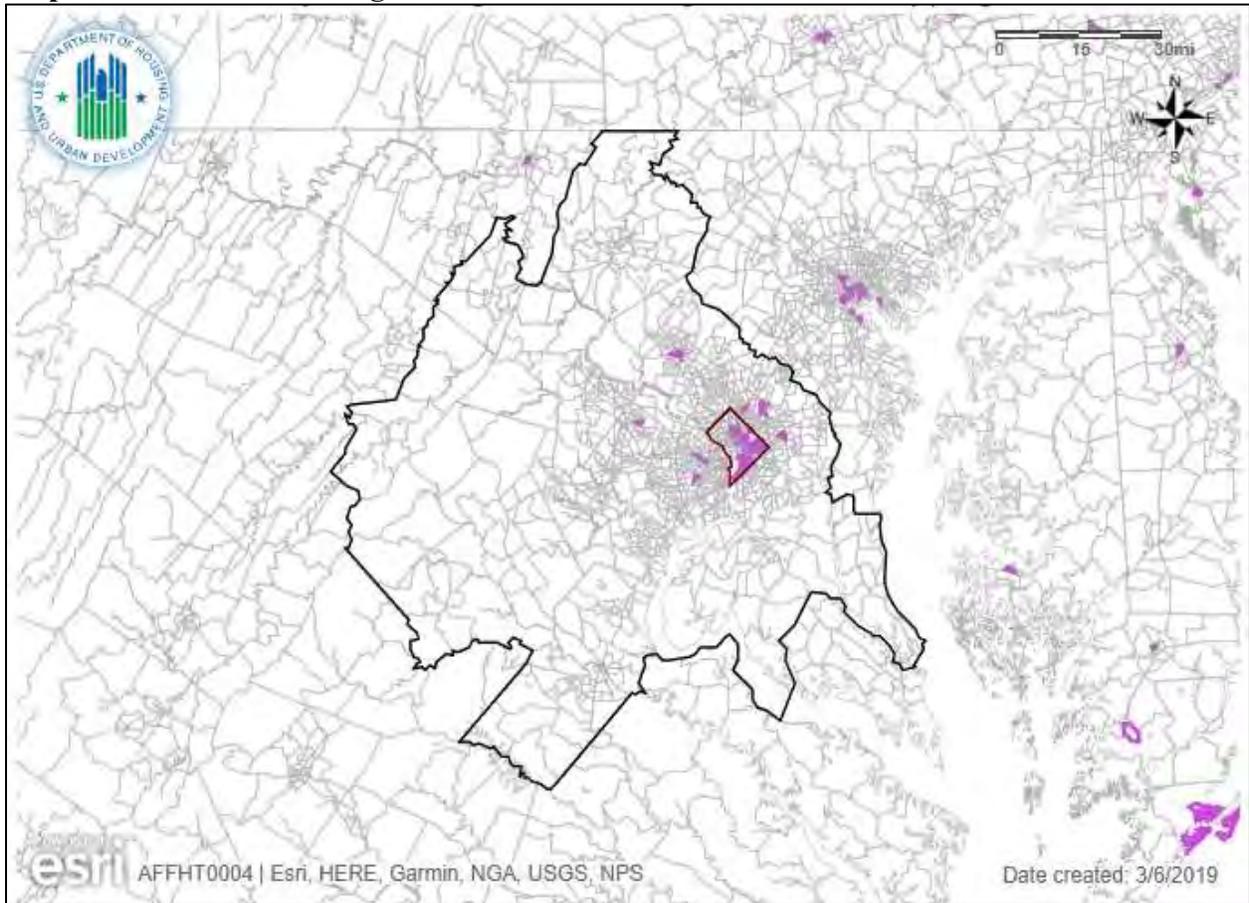
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<sup>31</sup> Map of District of Columbia Wards is available from the DC Office of Planning: <https://planning.dc.gov/page/neighborhood-planning-01>.

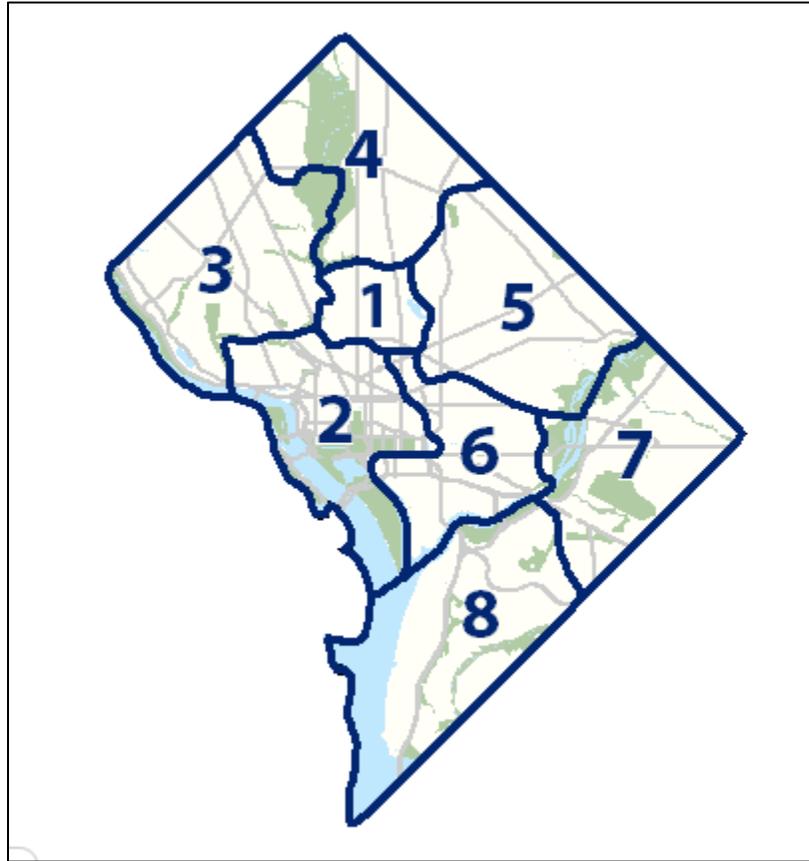
**Map 1: R/ECAPs in the District of Columbia**



**Map 2: R/ECAPs in the Region**



**Map 3: DC Wards**



*Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?*

Non-Hispanic Black residents make up a disproportionately large share of the population living in R/ECAPs in D.C. as compared to the population of Blacks in D.C. and the region as a whole, as well as to Blacks in R/ECAPs regionally. Non-Hispanic Blacks comprise 88.8% of all individuals living in R/ECAPs in D.C. (see Table 1) while making up only 50.03% of D.C.'s overall population (see Table 1, Demographic Summary). Around 40 percent of the total Black population in D.C. – over 120,000 individuals – live in R/ECAPs. Map 4 clearly shows the extreme nature of this over-representation of Blacks in R/ECAPs, with Black populations heavily concentrated in those sections of D.C. – e.g. southeast and northeast – that coincide spatially with the presence of R/ECAPs, while white residents concentrate in the central and northwest quadrants. No other race/ethnicity comprises even 5 percent of D.C.'s population in R/ECAPs. Non-Hispanic Whites and Hispanics account for the two next largest shares, at 4.91% and 3.53% respectively, below their overall shares in the population (34.81% for whites and 9.10% for Hispanics).

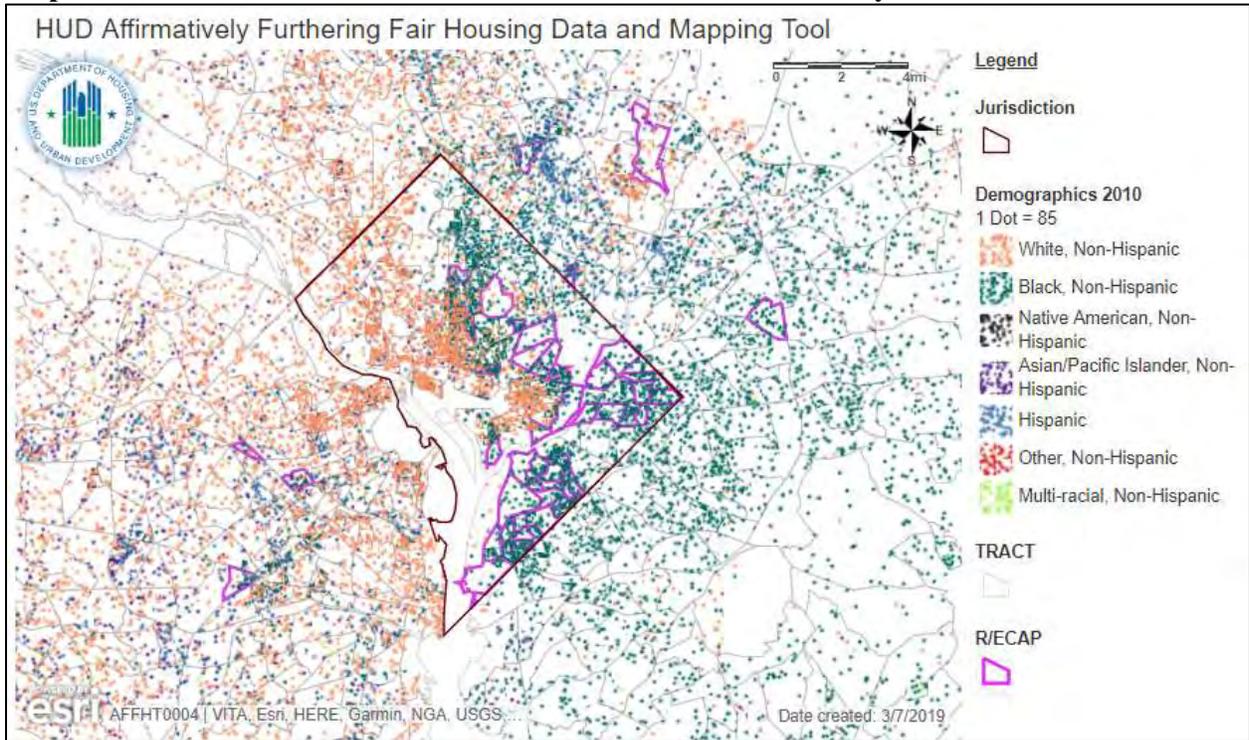
Regionally, non-Hispanic Blacks account for about 76% of all population in R/ECAPs and only 25% of the general population. Hispanics make up 10.77% of the region's R/ECAP population

(vs. about 14% of the overall population), while whites make up 8.16% of the R/ECAP population and about 49% of the overall population.

<b>Table 1 – R/ECAP Demographics, District of Columbia and Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area</b>						
	<b>District Of Columbia</b>			<b>Region</b>		
<b>R/ECAP Race/Ethnicity</b>		<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>
Total Population in R/ECAPs		140,047	-		180,426	-
White, Non-Hispanic		6,873	4.91%		14,722	8.16%
Black, Non-Hispanic		124,356	88.80%		136,830	75.84%
Hispanic		4,937	3.53%		19,440	10.77%
Asian/Pacific Island, Non-Hisp.		1,309	0.93%		5,721	3.17%
Native American, Non-Hisp.		323	0.23%		427	0.24%
Other, Non-Hispanic		169	0.12%		317	0.18%
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs		29,699	-		38,301	-
Families with children		15,360	51.72%		19,980	52.17%
<b>R/ECAP National Origin</b>						
Total Population in R/ECAPs		140,047	-		180,426	-
#1 country of origin	Ethiopia	1,040	0.74%	El Salvador	4,829	2.68%
#2 country of origin	El Salvador	984	0.70%	Ethiopia	2,613	1.45%
#3 country of origin	Nigeria	500	0.36%	Guatemala	1,247	0.69%
#4 country of origin	Trinidad & Tobago	488	0.35%	Mexico	1,135	0.63%
#5 country of origin	Jamaica	291	0.21%	Vietnam	1,052	0.58%
#6 country of origin	Honduras	290	0.21%	Honduras	1,007	0.56%
#7 country of origin	Mexico	252	0.18%	Nigeria	860	0.48%
#8 country of origin	China	208	0.15%	Bolivia	798	0.44%
#9 country of origin	Guatemala	206	0.15%	Peru	737	0.41%
#10 country of origin	Cameroon	185	0.13%	China	612	0.34%
<i>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 2: Data Sources: Decennial Census; ACS. Note 3: China does not include Hong Kong and Taiwan. Note 4: Refer to the Data Documentation for details</i> <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> .						

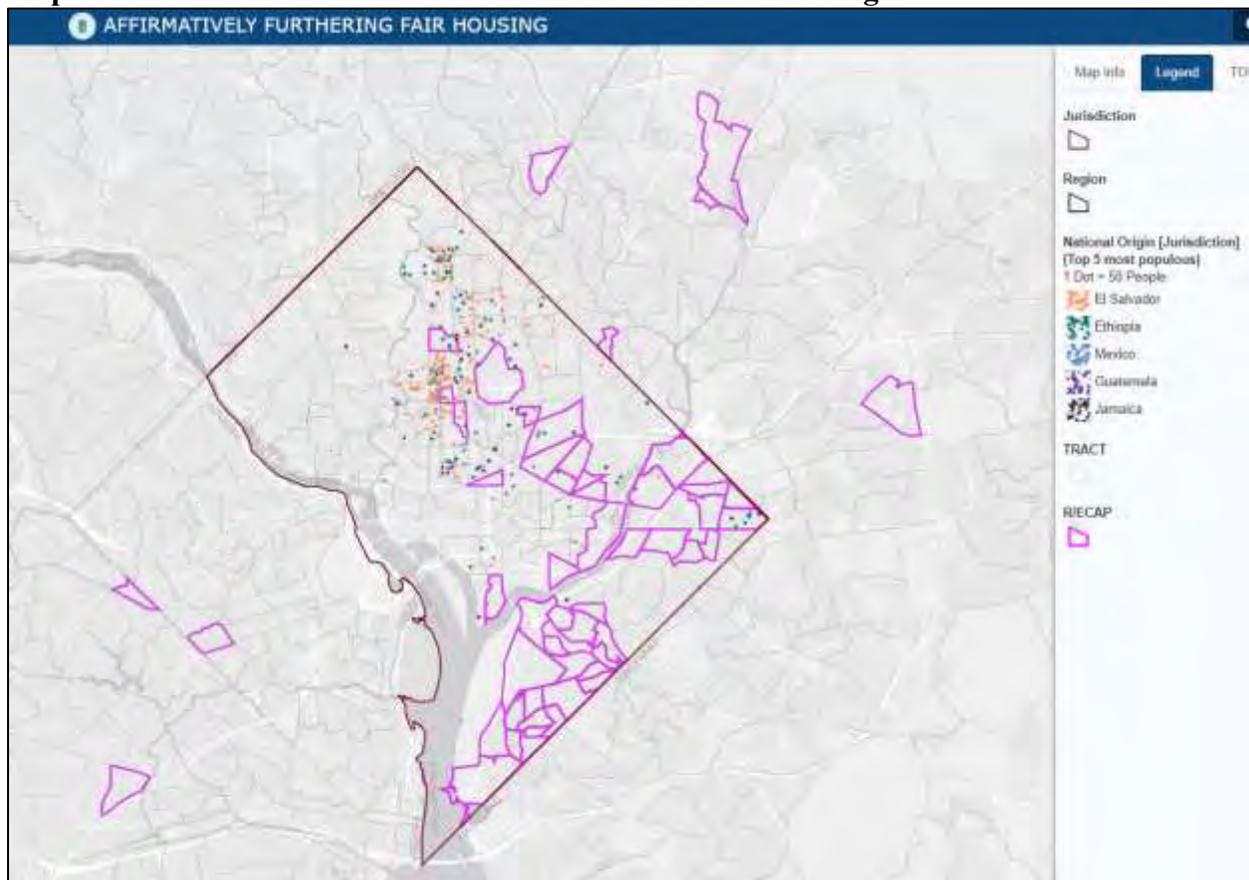
Foreign born residents make up a small share of the total population in R/ECAPs. In the D.C., taken together individuals from the top 10 countries of origin make up only 3.18% of the total population in R/ECAPs and no country comprises even 1 percent (see Table 1). Ethiopia has the highest share, at 0.74%. While higher shares of foreign-born persons live in R/ECAPs at the regional level, these shares are still disproportionately small relative to the region as a whole. Map 5 makes evident the sparse presence of foreign born residents in R/ECAPs in D.C.

**Map 4: R/ECAPs in the District of Columbia with Race/Ethnicity**



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**Map 5: R/ECAPs in the District of Columbia with National Origin**



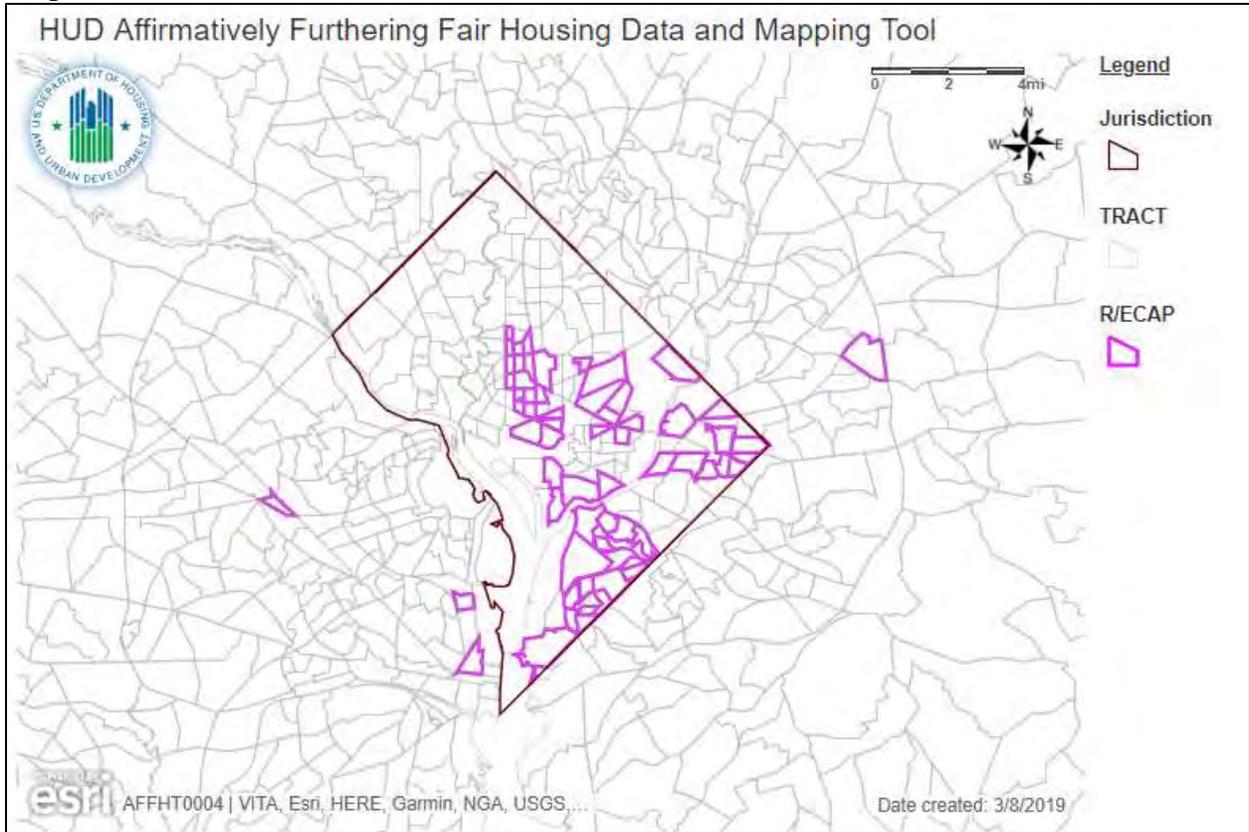
Families with children make up 51.72% of families living in R/ECAPs in D.C., as compared to comprising only 40.74% of all families overall in the city. This over-representation is important because the higher rate of dependent children living in R/ECAPs translates to an even greater strain on the resources of the people living there who, statistically, are already living in poverty. There is also over-representation at the regional level, but to a lesser degree: 52.17% of total families in R/ECAPs are families with children versus 48.08% of all families regionally.

*Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).*

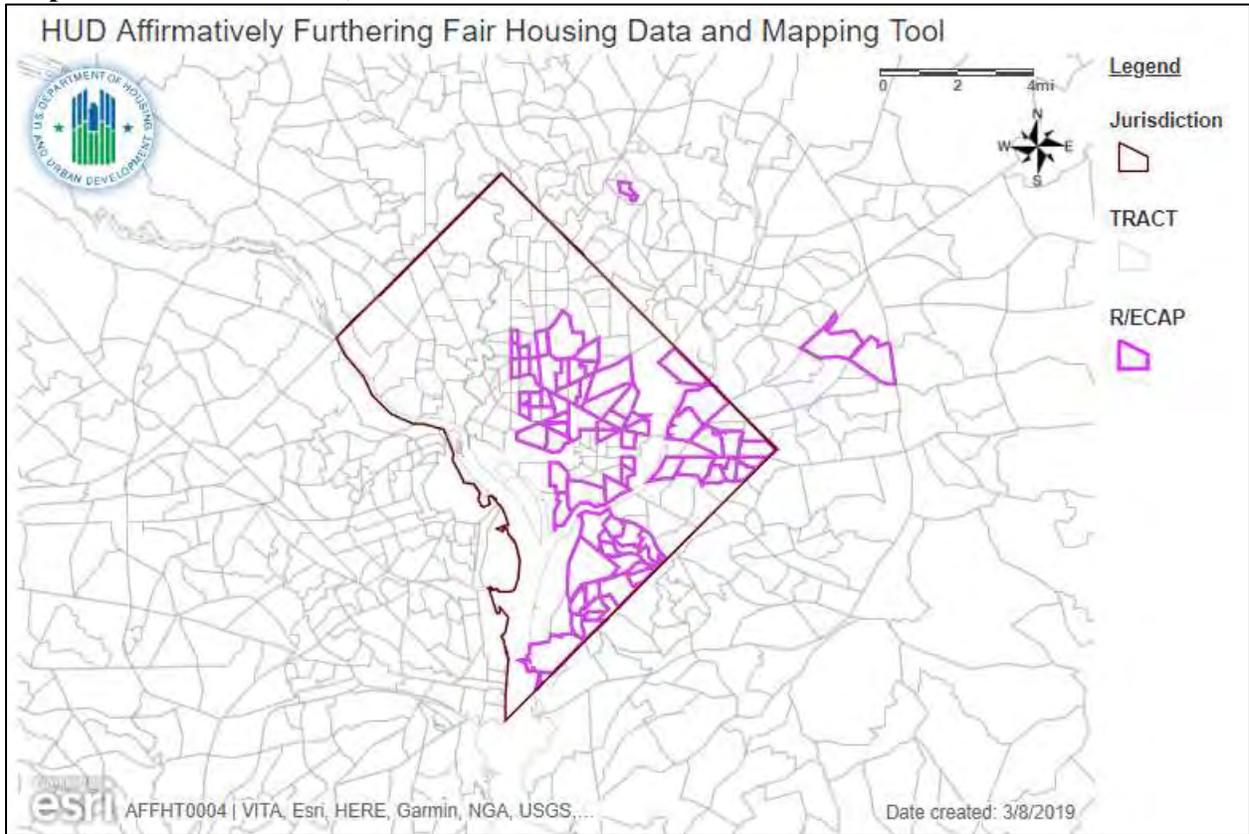
There have been changes in the number and location of R/ECAPs in both D.C. and the region, most noticeably between 2000 and 2010. In 1990, there were 39 R/ECAPs in the region, of which 37 were in D.C. Not much had changed by 2000: there were 40 R/ECAPs in the region, of which all but 1 were in D.C. Furthermore, maps 6 and 7 point to quite a bit of continuity as to the location of R/ECAPs over that 10 year span. As of 2000, most neighborhoods in southeast D.C. were R/ECAPs as were many centrally located tracts north of the national mall including some in Ward 1 and the eastern sections of Ward 2. By 2010, the patterns had changed. First, the number of R/ECAPs in the region had increased substantially, to 65. Of these, 53 were in D.C., also a higher number. R/ECAPs in the District had increased by 10 between 2000 and 2010, as had those in parts of the region outside of D.C. Map 8 illustrates some spatial changes as well. R/ECAPs remain considerably concentrated in southeastern neighborhoods, a consistent trend

stretching back to at least 1990. Fewer neighborhoods in Wards 1 and 2 now appear as R/ECAPs, and several outlying Maryland and Virginia census tracts have become R/ECAPs, pointing to greater suburbanization of poverty by 2010.

**Map 6: R/ECAPs in 1990, District of Columbia**

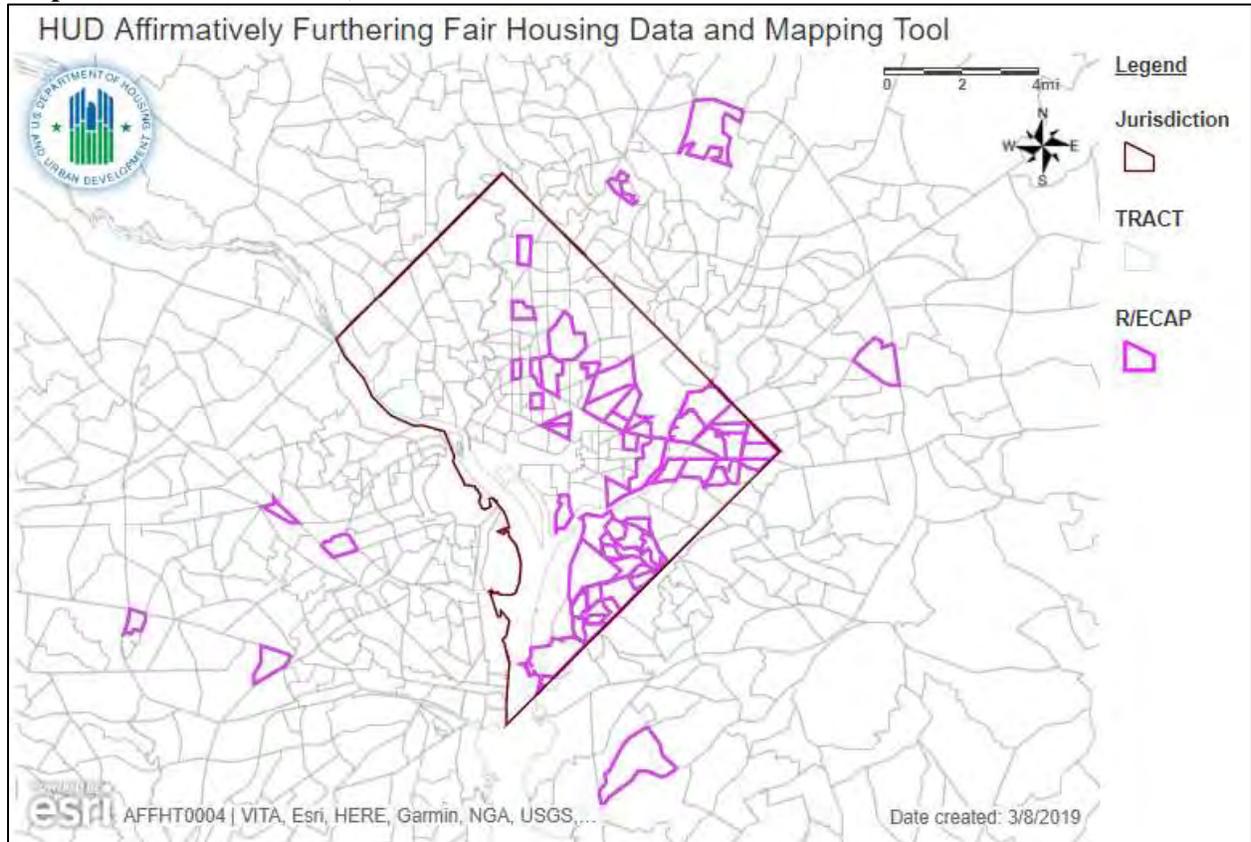


### Map 7: R/ECAPs in 2000, District of Columbia



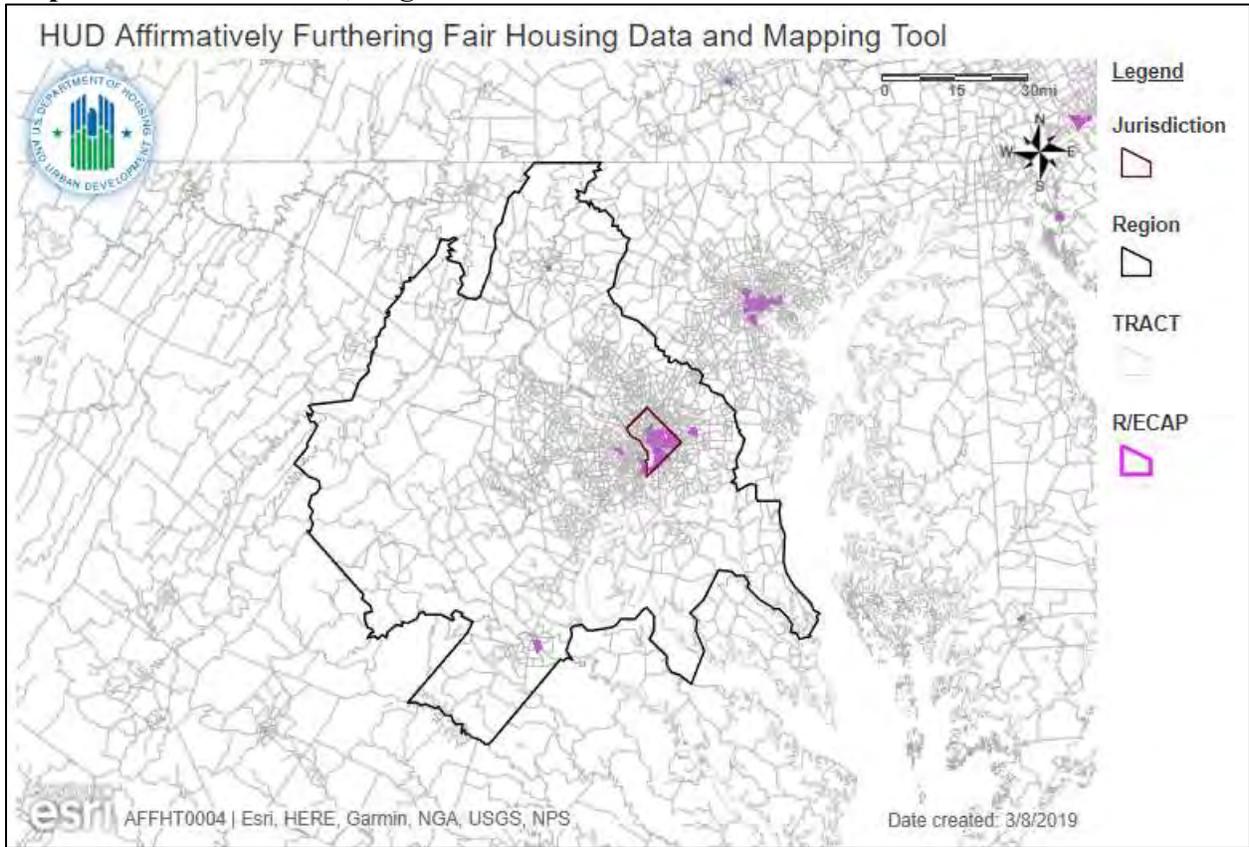
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### Map 8: R/ECAPs in 2010, District of Columbia



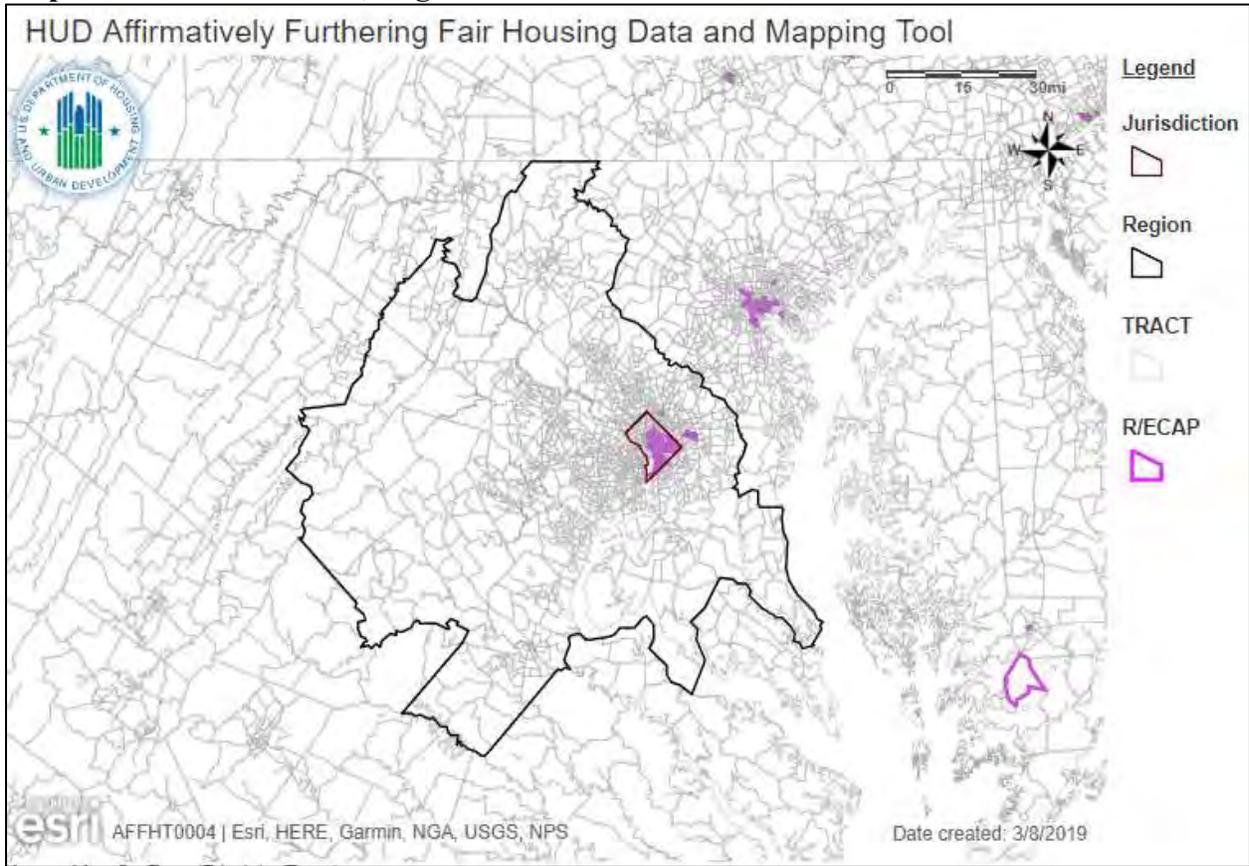
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### Map 9: R/ECAPs in 1990, Region

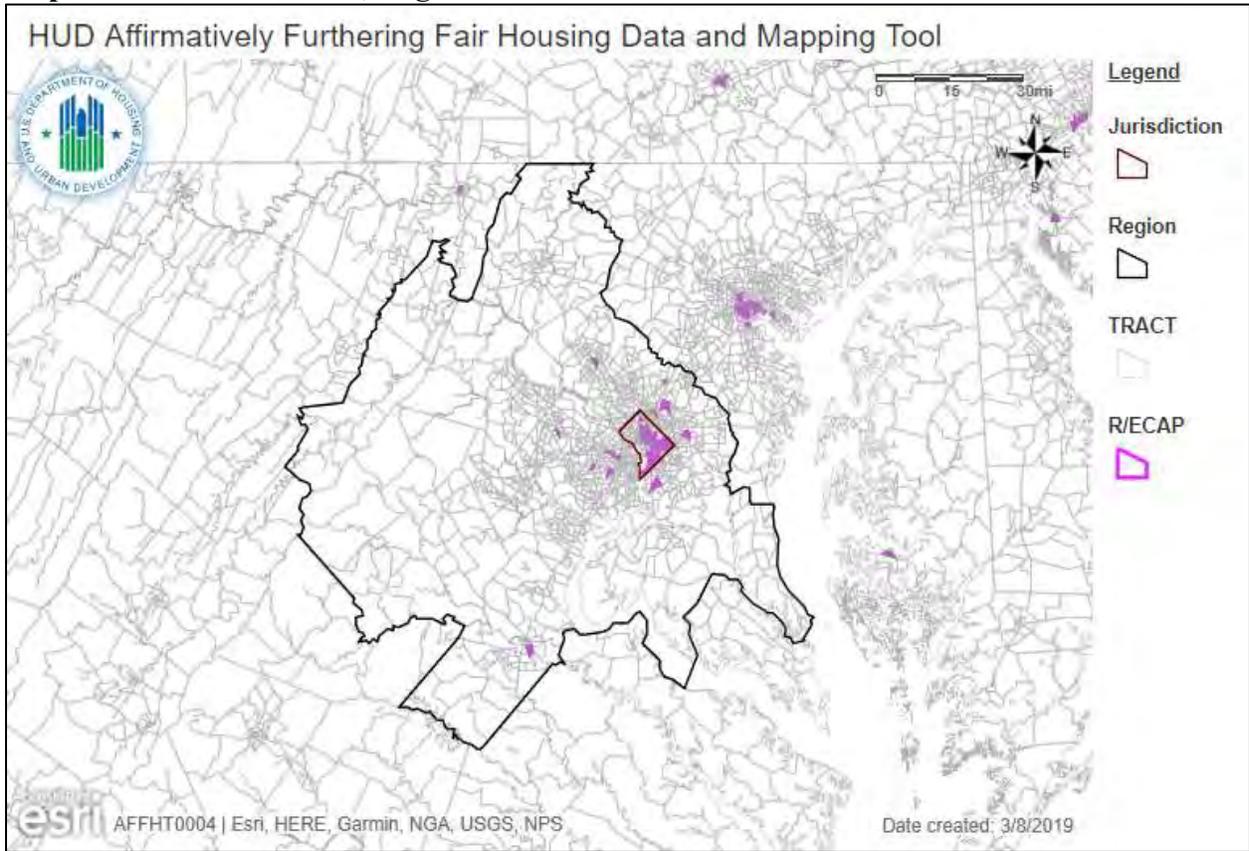


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**Map 10: R/ECAPs in 2000, Region**



**Map 11: R/ECAPs in 2010, Region**



### iii. Disparities in Access to Opportunity

This analysis of Disparities in Access to Opportunity evaluates the gaps, broken down by race and ethnicity, that people throughout D.C. and the greater Region experience in attempting to access services and opportunities. The analysis is broken down into the categories of Education, Transportation, Employment, Poverty, and Environmental Health. The data breaking down transportation and environmental health access do not indicate large disparities. This is because all residents experience very good access to transportation (through both the Metrorail and comprehensive bus system), while all residents also experience neighborhoods with very poor environmental health. On the other hand, there are large disparities in education, employment, and poverty throughout D.C., often breaking down along the same lines as residential segregation.

#### Education

*For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and Region.*

**Table 1: Opportunity Indicators by Race/Ethnicity, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

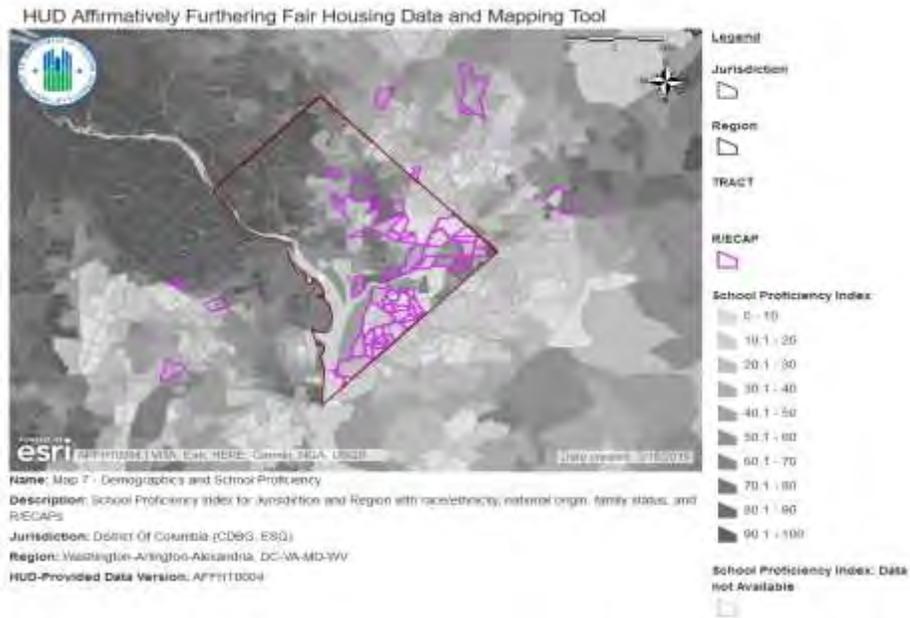
<b>Washington, D.C.</b>	<b>School Proficiency Index</b>
<b>Total Population</b>	
White, Non-Hispanic	68.43
Black, Non-Hispanic	34.41
Hispanic	51.22
Asian or Pacific Islander, Non-Hispanic	63.38
Native American, Non-Hispanic	46.48
<b>Population below federal poverty line</b>	
White, Non-Hispanic	64.55
Black, Non-Hispanic	30.27
Hispanic	49.41
Asian or Pacific Islander, Non-Hispanic	62.73
Native American, Non-Hispanic	52.69
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>	
<b>Total Population</b>	
White, Non-Hispanic	41.08
Black, Non-Hispanic	39.11
Hispanic	39.67
Asian or Pacific Islander, Non-Hispanic	38.83
Native American, Non-Hispanic	39.58

<b>Population below federal poverty line</b>	
White, Non-Hispanic	42.18
Black, Non-Hispanic	38.25
Hispanic	38.97
Asian or Pacific Islander, Non-Hispanic	41.58
Native American, Non-Hispanic	43.65

In D.C., Black and Hispanic residents have lower access to proficient schools than other racial and ethnic groups. D.C. has a large range of School Proficiency Index scores with wide levels of access across racial and ethnic groups. This trend continues for racial and ethnic groups residing immediately outside the city as well, mimicking racial and ethnic residential patterns within D.C. For example, West D.C. has a high population of White residents, and this continues beyond the western border of the state into Bethesda, with consistently high access to proficient schools. On the other hand, the Northeast area of D.C. contains higher populations of Black and Hispanic residents with low access to proficient schools, and this continues along the Northeast border of the District into Maryland. Hispanic residents in the middle of D.C., including a large Salvadoran community, have middling access to proficient schools when compared with the Northwest region of D.C. Black residents in East and Southeast D.C., especially the region south of the Anacostia River, have drastically lower access to proficient schools than the rest of D.C. Meanwhile, Asian residents have consistent access to proficient schools throughout D.C. Differences are negligible for those below the poverty line. On the regional level, school proficiency for every group except White residents rises, while it falls by more than 20 points for White residents. Once again, differences for those below the poverty line are negligible. The increase in scores for Black residents in the Region is likely influenced at least in part by the less severe segregative patterns in the Region than in D.C., and the lessened economic pressures due to more affordable housing markets in some areas outside of the city.

*For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and Region.*

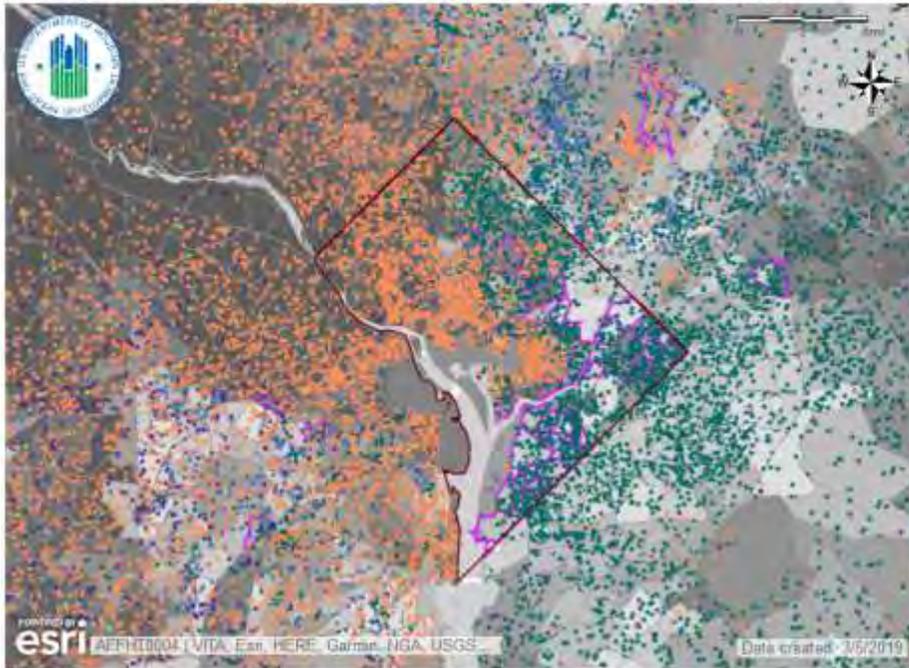
# Map 1: School Proficiency Index, D.C.



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**Map 2 (1 of 2): Race/Ethnicity and School Proficiency, D.C.**

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**Legend**

**Jurisdiction**



**Region**



**Demographics 2010**

1 Dot = 75

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

**TRACT**

**R/ECAP**



**School Proficiency Index**

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

**School Proficiency Index: Data not Available**



**Name:** Map 7 - Demographics and School Proficiency

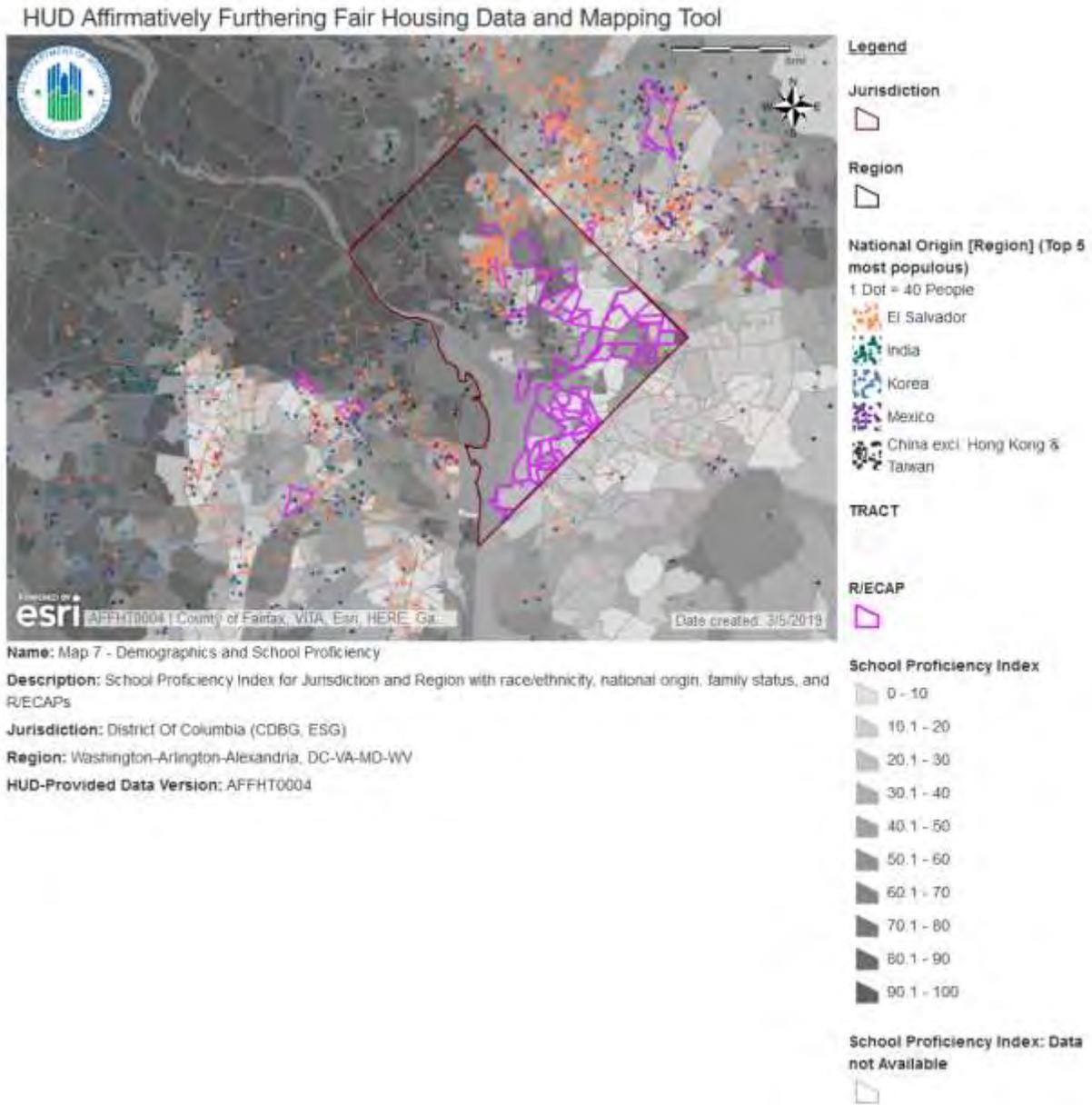
**Description:** School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

**Jurisdiction:** District Of Columbia (CDBG, ESG)

**Region:** Washington-Arlington-Alexandria, DC-VA-MD-WV

**HUD-Provided Data Version:** AFFHT0004

## Map 2: National Origin and School Proficiency, D.C.



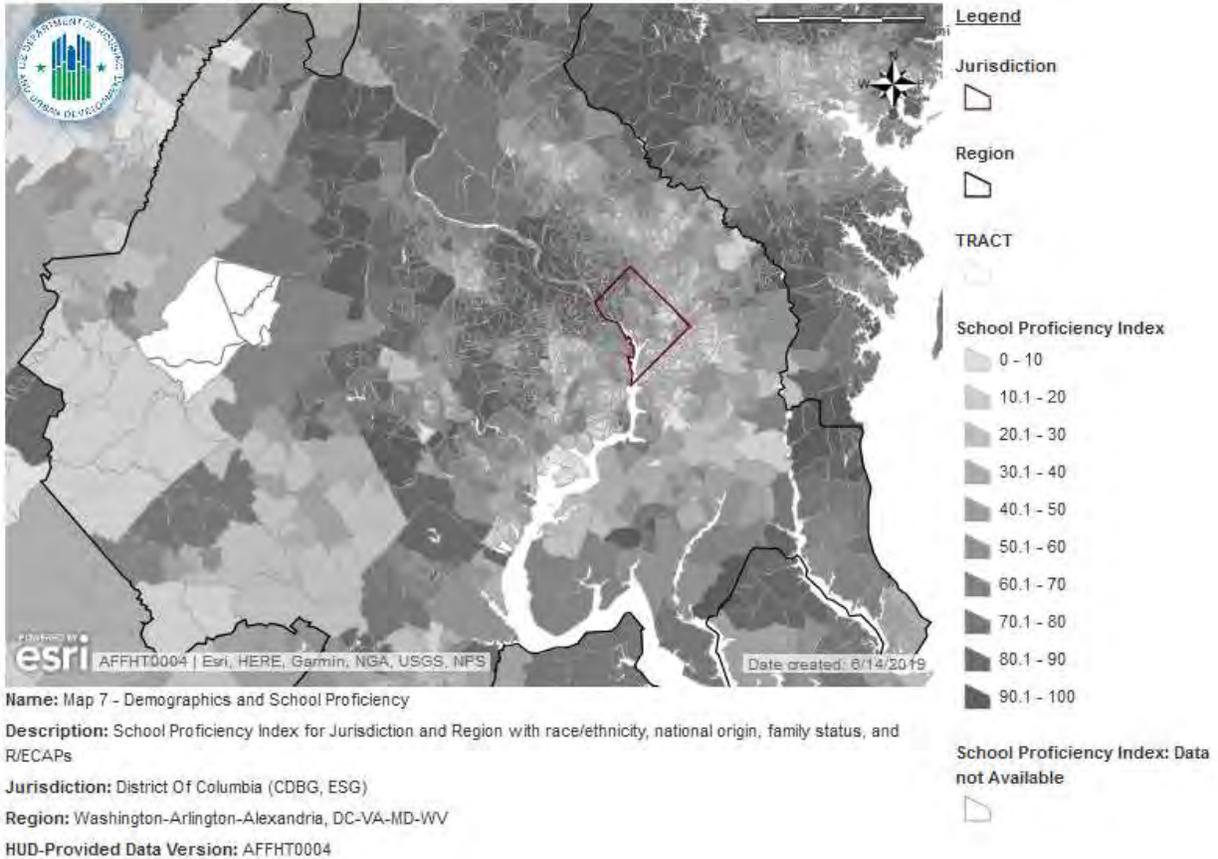
### Map 3: Family Status and School Proficiency, D.C.

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## Map 4: Demographics and School Proficiency, Region

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In D.C., patterns of access to proficient schools are linked to broader residential patterns. As explored previously, D.C. has distinct patterns of segregation, with White residents having more presence in much of the Northwest section of D.C., and Black residents being more present in the East of the District, and the section southeast of the Anacostia River. This pattern of segregation is also strongly linked to access to proficient schools within D.C.'s borders.

The western section of D.C. has consistently high levels of access to proficient schools, with ranges of School Proficiency Index scores from 70-100. This region also has higher populations of White and Asian residents, especially in the westernmost corner of D.C., as well as larger numbers of families with children.

The center of D.C., along the Metro's Green Line and including the 16<sup>th</sup> Street Heights and Brightwood neighborhoods, has lower levels of access to proficient schools, with School Proficiency Index scores ranging from 20-50. This affects the large population of Salvadoran residents in the area.

Downtown, access to proficient schools is generally high, with the exception of the Chinatown area (though this neighborhood does have a larger number of families with children than most of

the surrounding neighborhoods). The Capitol Hill neighborhood also has higher levels of access to proficient schools, though this changes to the north of Florida Ave. and south of the Anacostia River. These areas, Northeast and Southeast D.C., have the lowest access to proficient schools in the District, with some exceptions.

The neighborhoods of University Heights, Brentwood and Edgewood in Northeast D.C. have higher levels of access to proficient schools than surrounding areas. This is likely because of the number of universities in the region, including Trinity College and the Catholic University of America.

On the regional level, the map above indicates that there is a clear pattern of high proficiency schools along the Potomac River to the northwest of D.C., as well as in large swaths of Northern Virginia and Maryland. At the very edges of the region on both the Virginia and Maryland sides, school proficiency levels are noticeably lower. Due to the extreme size of the region and the highly localized nature of school districts and school proficiency, it is difficult to draw sweeping conclusions about the disparities in educational access displayed by this map.

*Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.*

This process required extensive consultation with community groups and individual residents in order to better evaluate policies and forces that exert pressure on the individual facets of this analysis. The displacement of low-income families and communities of color has impacts not only on residential patterns, but also has ripple effects on areas like education. During the community participation process, residents expressed many hardships related to housing, but also mentioned that moving would require them to miss out on better schools in D.C. as well as other free educational programs offered in D.C. In particular, there was a desire to retain access to English learning classes.

For more discussion of school policy as it relates to disparities in access to opportunity, see the contributing factors, particularly “Location of proficient schools and school assignment policies.”

## Employment

*For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and Region.*

**Table 1 Opportunity Indicators by Race/Ethnicity, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

<b>Washington, D.C.</b>	<b>Labor Market Index</b>	<b>Jobs Proximity Index</b>
<b>Total Population</b>		
White, Non-Hispanic	89.96	67.46
Black, Non-Hispanic	38.28	45.11
Hispanic	73.01	53.70
Asian or Pacific Islander, Non-Hispanic	85.80	69.70
Native American, Non-Hispanic	58.09	55.41
<b>Population below federal poverty line</b>		
White, Non-Hispanic	89.10	69.04
Black, Non-Hispanic	32.83	45.24
Hispanic	72.59	53.43
Asian or Pacific Islander, Non-Hispanic	88.59	75.38
Native American, Non-Hispanic	55.47	49.84
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>		
<b>Total Population</b>		
White, Non-Hispanic	83.65	51.69
Black, Non-Hispanic	62.87	43.97
Hispanic	74.94	46.78
Asian or Pacific Islander, Non-Hispanic	87.08	51.39
Native American, Non-Hispanic	73.38	48.98
<b>Population below federal poverty line</b>		
White, Non-Hispanic	77.34	53.90
Black, Non-Hispanic	51.07	45.19
Hispanic	70.24	46.03
Asian or Pacific Islander, Non-Hispanic	84.19	54.45
Native American, Non-Hispanic	72.09	49.48

HUD-provided indices supply two data points regarding access to employment in D.C.: Labor Market Index and Job Proximity Index. In evaluating these indices, it is clear that job market strength is starkly split along racial lines in D.C. Areas with majority White populations almost all have strong job markets with an index of 50 or above, while areas with majority Black

populations, especially in Southeast D.C., have much weaker job markets. Florida Avenue demarcates an especially stark difference in job markets, with the area south of the street having much stronger job markets than the area north of the street. More diverse areas in the middle of the District, such as Columbia Heights, also have stronger job markets, as does University Heights, because of its close proximity to a few universities in the region.

The Jobs Proximity Index (above) is a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood. In D.C., Job Proximity Index values cluster together, and do not change much between the general population and residents who live below the poverty line. Asian American and Pacific Islander residents actually outstrip White residents in this Index, with scores of 69.70 and 67.46, respectively. Hispanics and Native Americans scored similarly to each other, at 53.70 and 55.41, respectively. Meanwhile, Black residents scored about 20 points behind their White and Asian American and Pacific Islander counterparts, at 45.11. Below the poverty line, very similar levels were maintained, with the notable exception that Asian American and Pacific Islander scores actually rose.

Regionally, there is far less disparity in the scores of different racial groups. White and Asian American and Pacific Islander residents both score roughly the same and the highest of all the groups, at 51.69 and 51.39, respectively. Native Americans score in third place, at 48.98. Hispanics scored 46.78, and Black residents scored 43.97; this less than 10 point disparity is very notable compared to the far greater disparities within D.C. For residents below the poverty line, each group has a roughly equal or even slightly higher score. White residents scored 53.90, Black residents 45.19, Hispanic residents 46.03, Asian American and Pacific Islanders 54.45, and Native Americans 49.48. The more equalized values across the region suggests that segregative patterns are less common on a regional level, and that those segregative residential patterns that do exist have less of an effect on job proximity across racial and ethnic groups.

A second employment metric, the Labor Market Engagement Index, is a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood. This Index sees the largest gap of any of the Opportunity Indices. While White residents score very high on this index at 89.96, Black residents score more than 50 points below that at 38.28. There is also a 10-20 point gap between the Labor Market Engagement Index scores and the Job Proximity Index scores. Meanwhile, Native Americans receive a middling score at 58.09, and Hispanics and Asian Americans and Pacific Islanders rise toward the high end of the spectrum at 73.01 and 85.80, respectively. For those living below the poverty line, there is very little change in the index values. White residents still score very high at 89.10. The gap with Black residents increases even more at 32.83. Hispanics scored 72.59, Asian Americans and Pacific Islanders scored 88.59, and Native Americans scored 55.47. It is difficult to say why these disparities exist, and particularly why there is a 10-20 point gap between the Labor Market Engagement Index and the Job Proximity Index, as they are measuring related data. One possibility is that as the Labor Market Engagement Index measures educational attainment,

relative gaps across racial and ethnic groups in educational attainment may influence the lower scores in the Labor Market Engagement Index, while the Job Proximity Index accounts merely for any employment and does not differentiate across levels or qualifications.

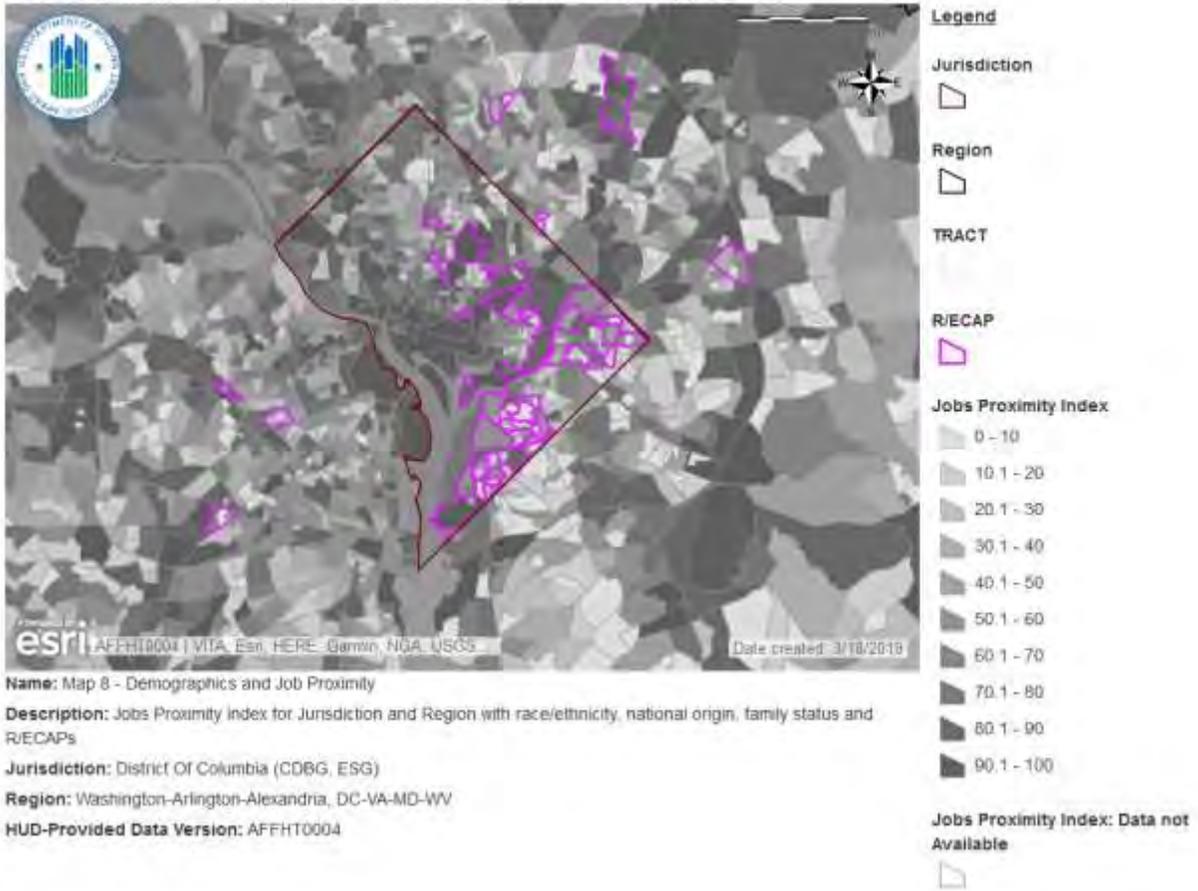
Regionally, the biggest change is seen in the increase of Labor Market Engagement Index values for Black residents to 62.87. White, Hispanic, and Asian American and Pacific Islander residents all maintain similar values at 83.65, 74.94, and 87.08, respectively. Native Americans see a notable change, rising to 73.38 on the Index. For those below the poverty line, the changes are not very pronounced; every value stays above the 50<sup>th</sup> percentile. White residents fall less than 10 points to 77.34; Black residents scored 51.07; Hispanics scored 70.24; Asian American and Pacific Islanders scored 84.19; Native Americans scored 72.09. The biggest takeaway from this regional analysis is that Black residents have greater access to employment opportunity on the regional level than in D.C., suggesting that the extreme residential segregation in D.C., which is much more pronounced than in the region, is negatively affecting Black residents' access to employment.

*For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and Region.*

With regard to residential living patterns, in D.C. disparities in job proximity are generally modest, with one notable exception. Southeast D.C., across the Anacostia River, contains a large population of Black residents and has generally low job proximity. Areas west of Rock Creek Park also have areas of lower job proximity, though this is likely due to the fact that these areas are more residential and have less urban density. R/ECAPs in D.C. generally have less job proximity as well, with a few notable exceptions. Census tracts 002302, 009102, and 008803 are surrounded by Howard University, the Catholic University of America, Gallaudet University and the Children's National Main Hospital. This helps explain the higher job proximity in these areas.

# Map 1: Demographics and Job Proximity, D.C.

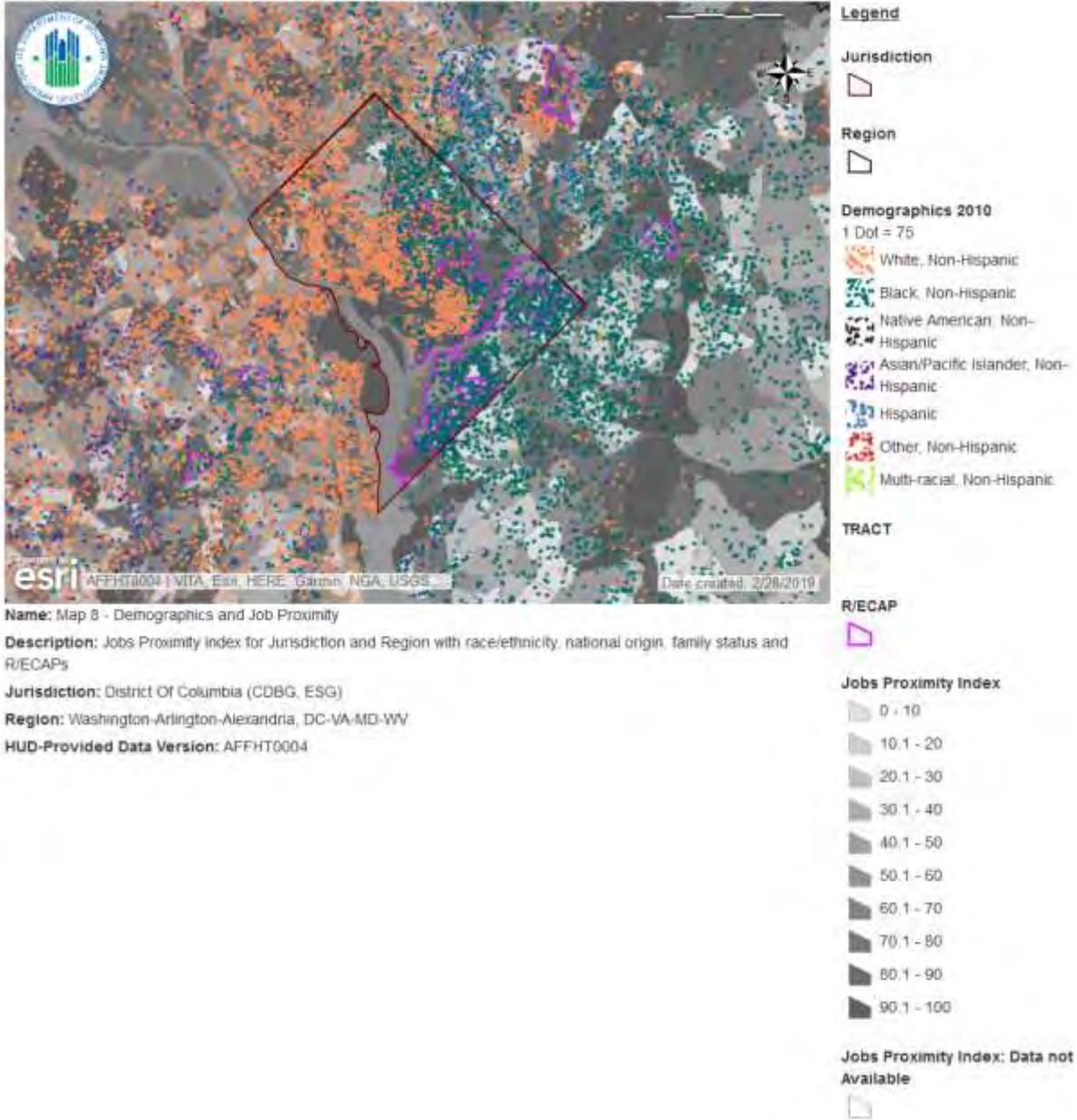
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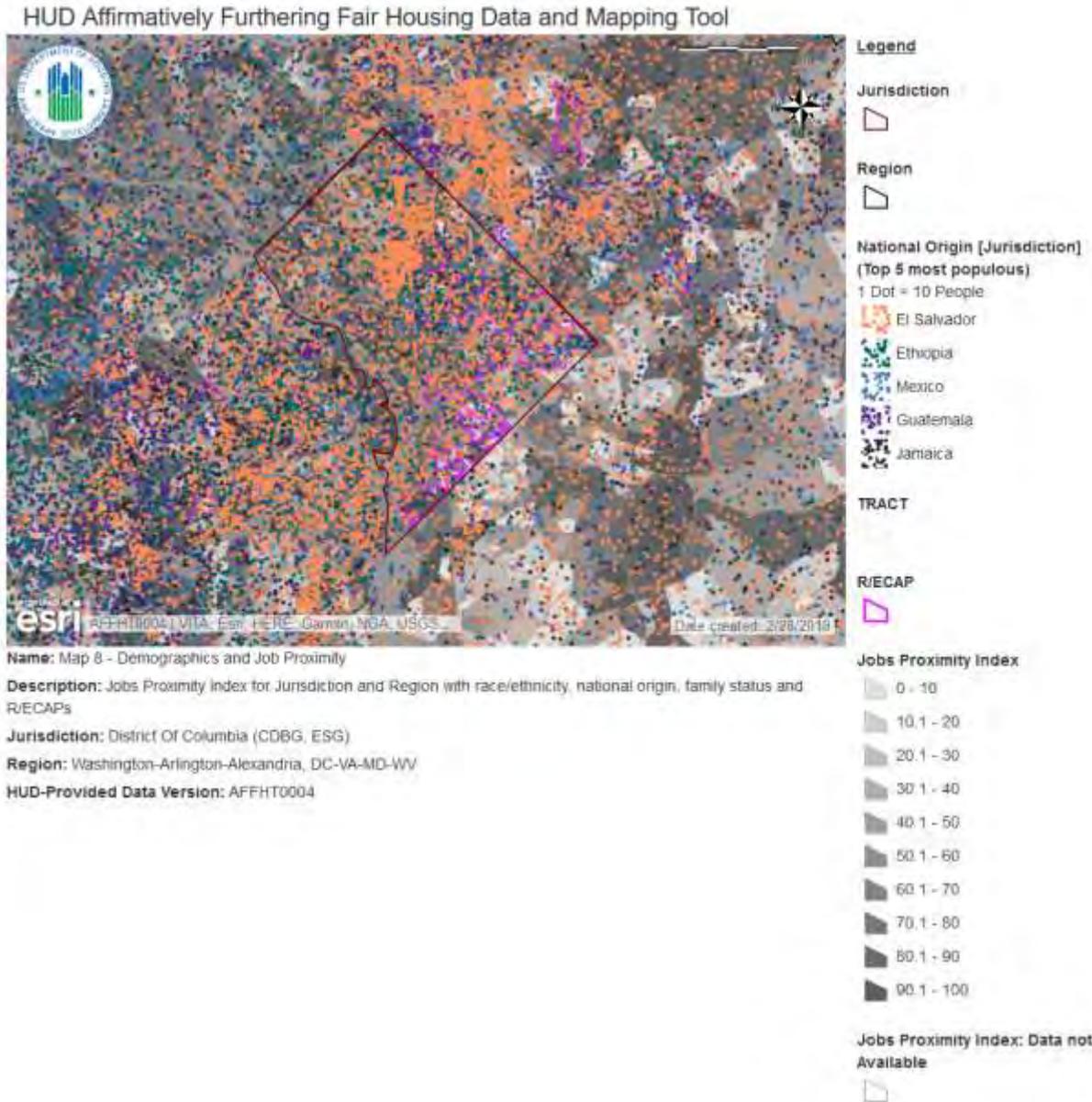
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## Map 2: Demographics and Job Proximity (Race/Ethnicity), D.C.

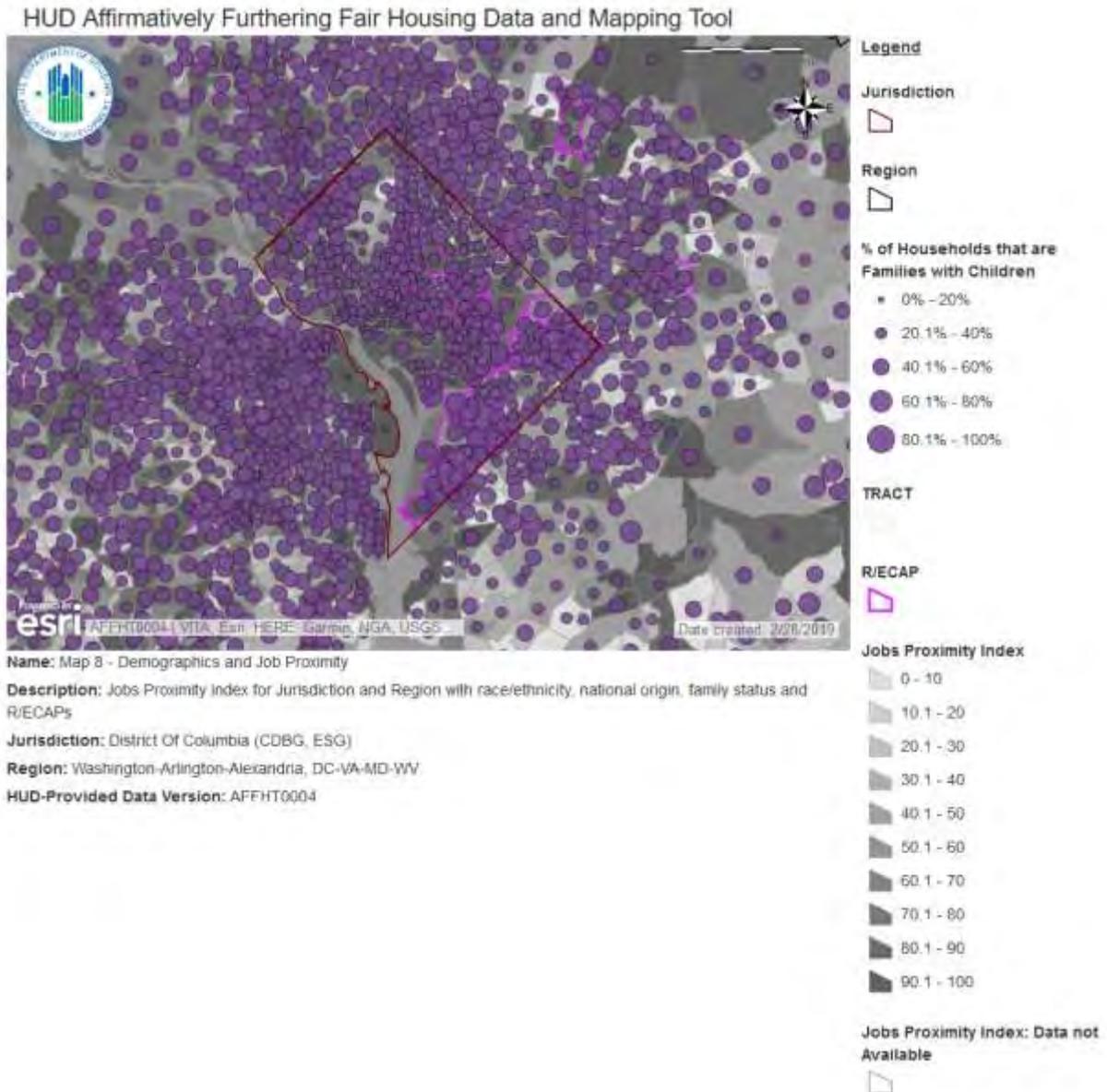
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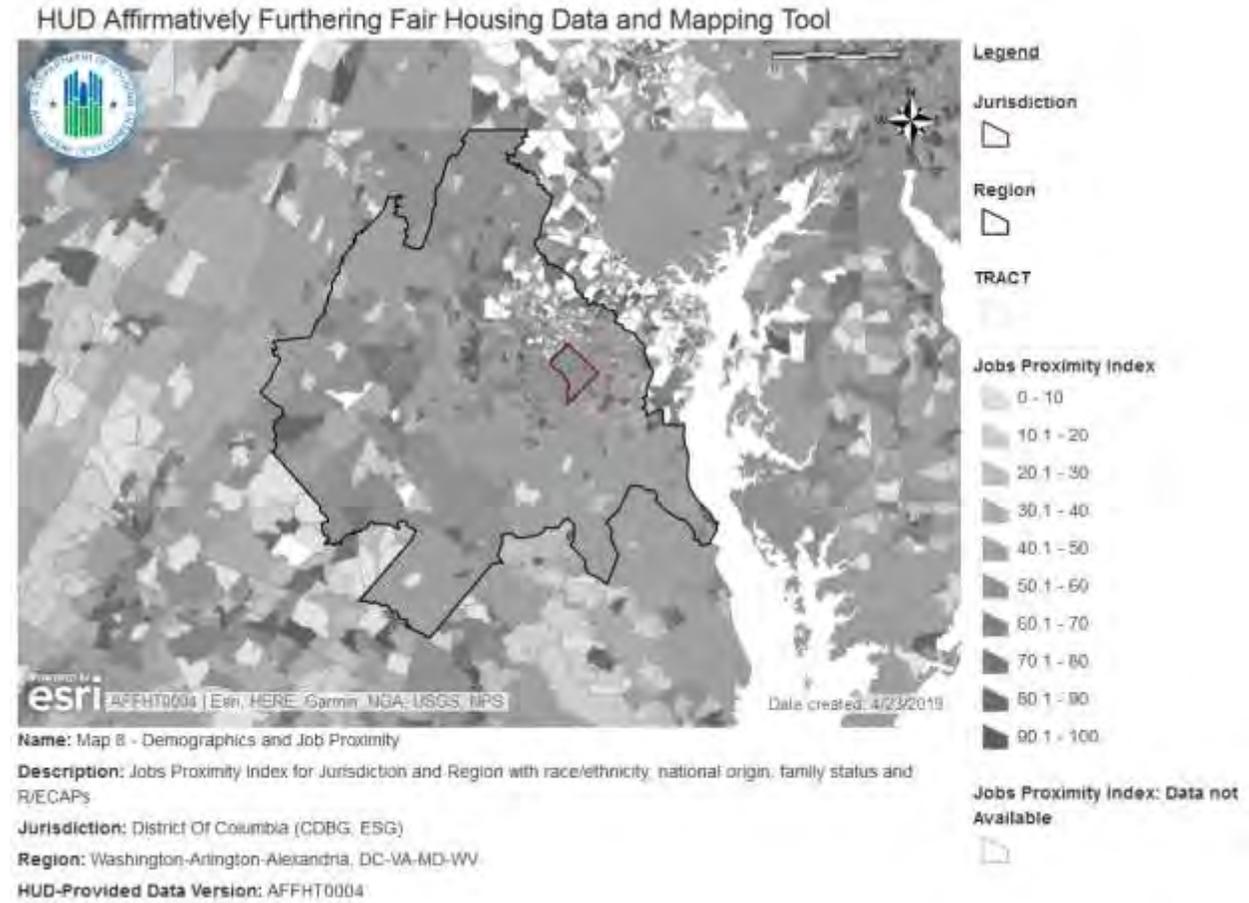
### Map 3: Demographics and Job Proximity (National Origin), D.C.



**Map 4: Demographics and Job Proximity (Family Status), D.C.**



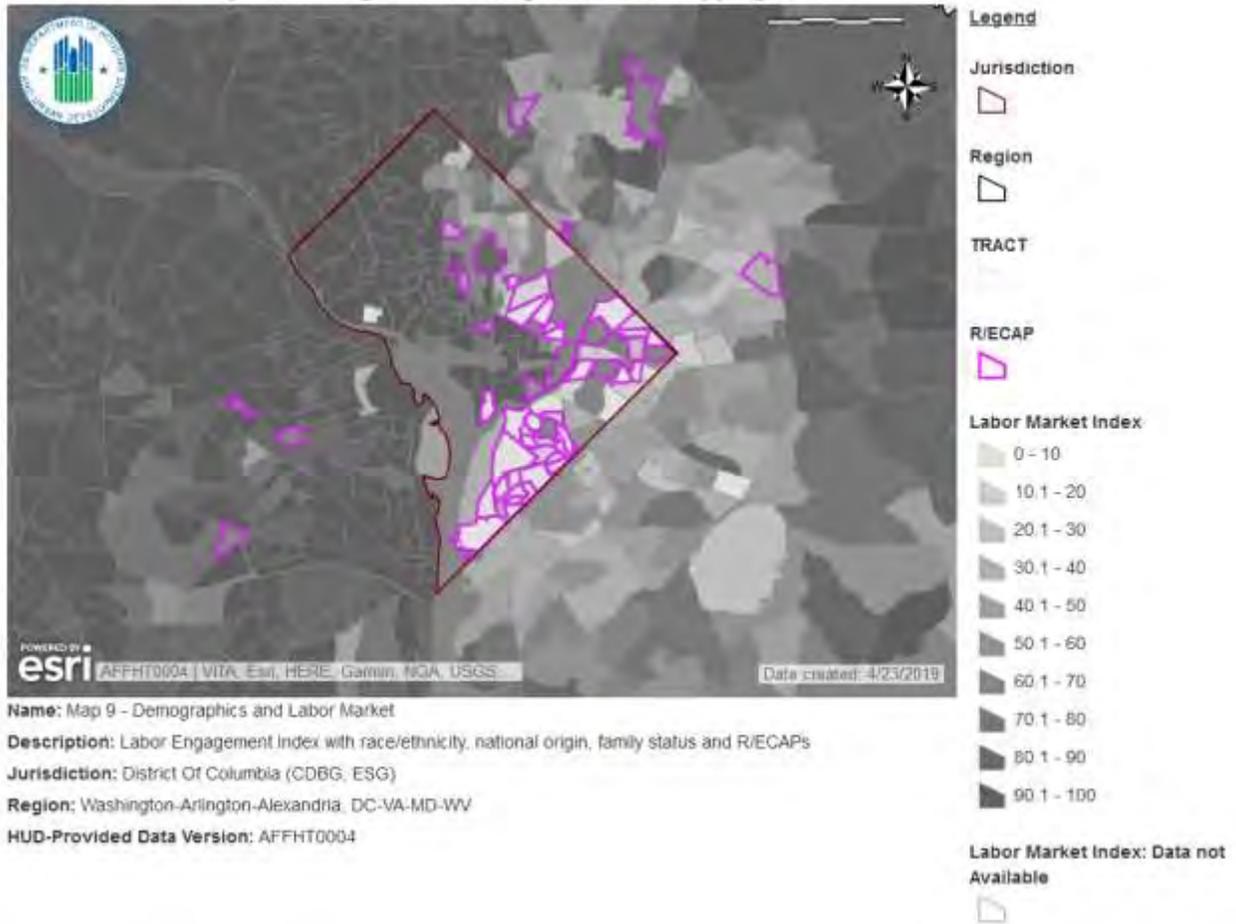
## Map 5: Demographics and Job Proximity, Region



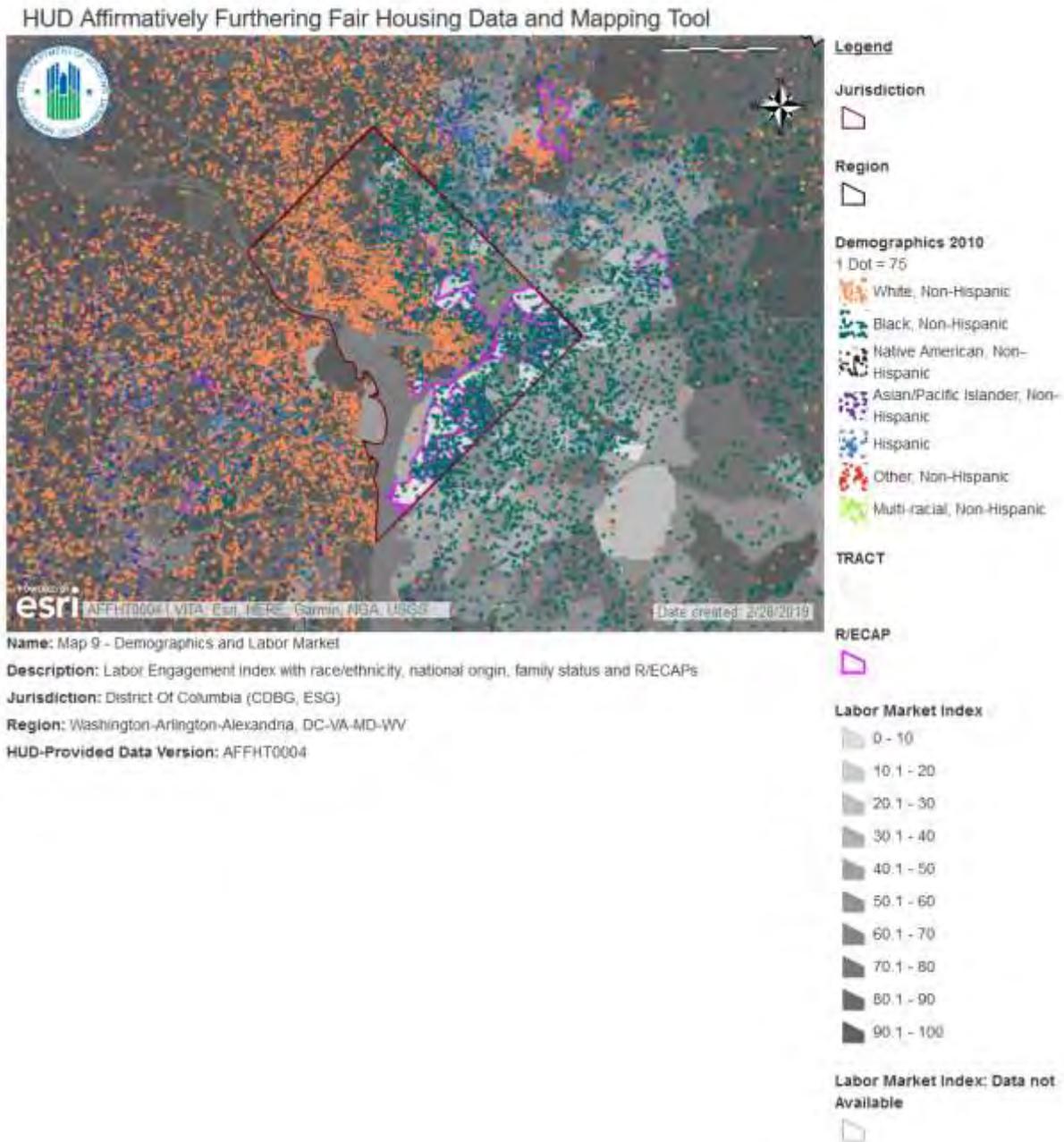
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## Map 6: Demographics and Labor Market, D.C.

### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



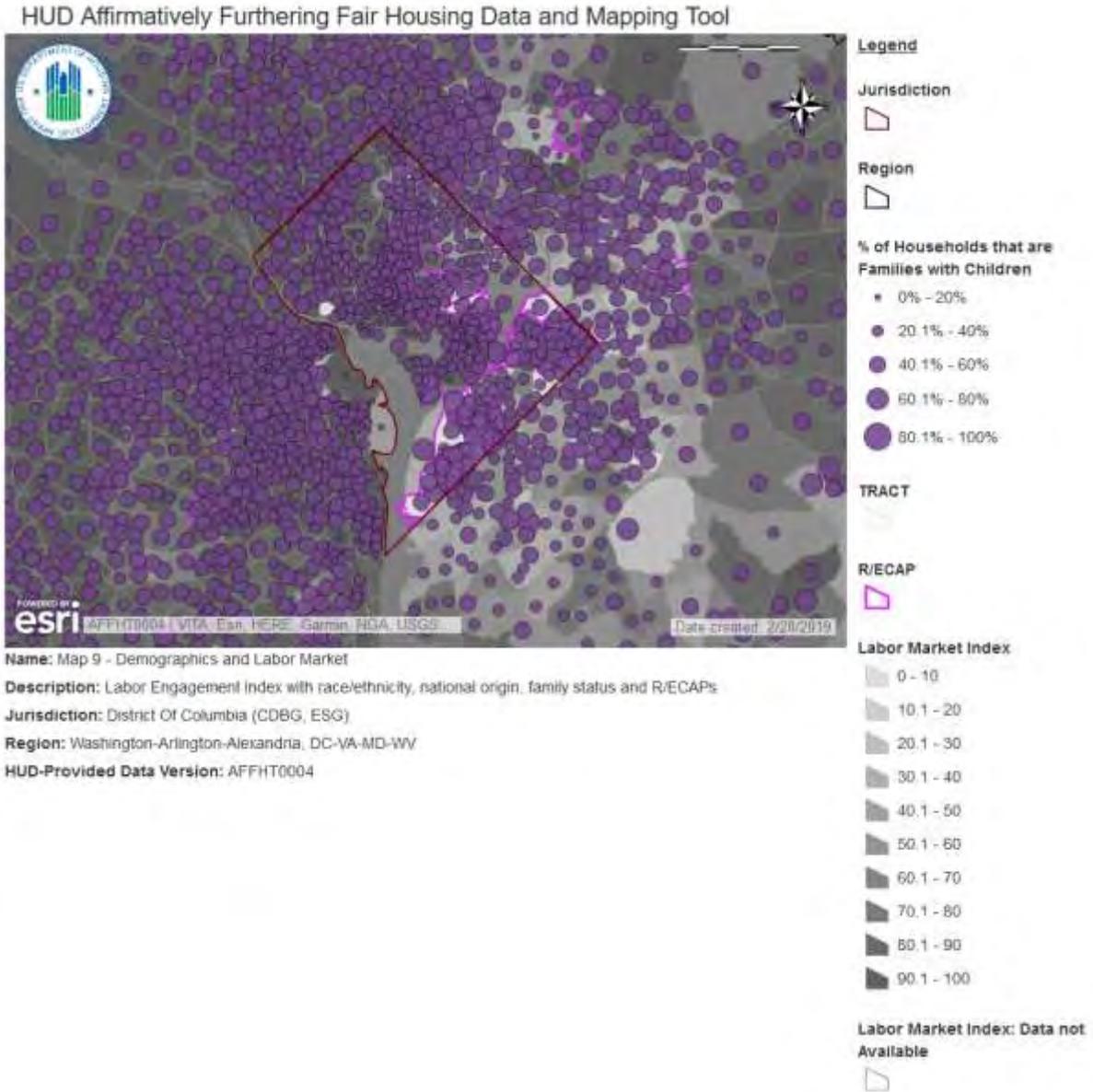
## Map 7: Demographics and Labor Market (Race/Ethnicity), D.C.



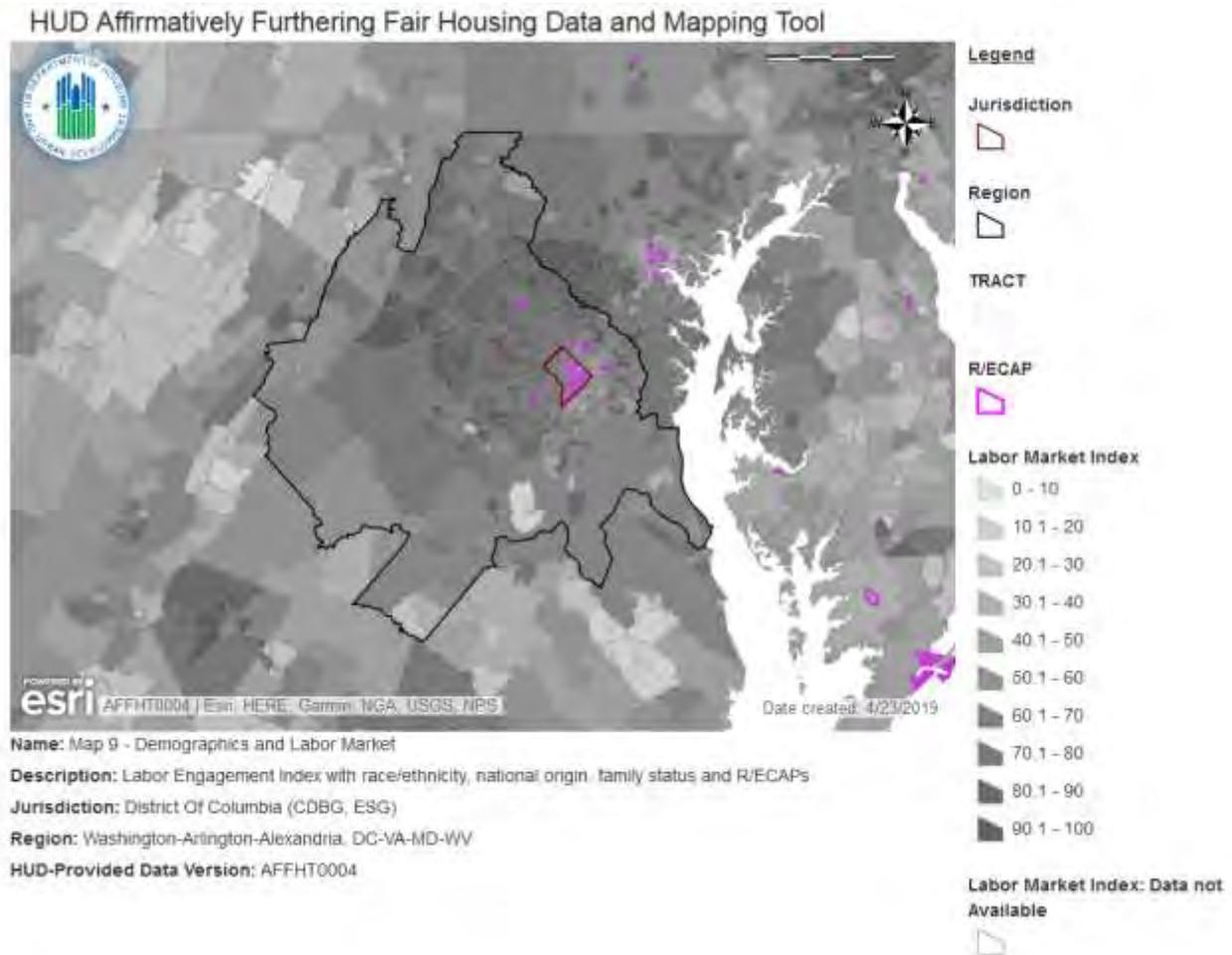
**Map 8: Demographics and Labor Market (National Origin), D.C.**



**Map 9: Demographics and Labor Market (Family Status), D.C.**



## Map 10: Demographics and Labor Market, Region



D.C. has a high population of residents with Salvadoran national origin located in the center of the city, by the Columbia Heights, Petworth, 16<sup>th</sup> Street Heights and Brightwood neighborhoods. These neighborhoods have slightly lower than average job proximity than the rest of D.C., though this does not indicate the quality of the jobs available. There is little consistency with job market based on national origins. The high Salvadoran population in this region have varying job market strengths.

Families tend to settle outside of D.C., or towards the outskirts of the city. There are high concentrations of households that are families with children in the area south of the Anacostia River, and in Arlington, where it is common for people to commute to downtown D.C. for work. There are also higher concentrations of households that are families with children in Bethesda, Silver Spring, and College Park, all of which border D.C. These areas have lower job proximity than usual, because of the high level of commuters to downtown D.C. Households without children are concentrated in downtown D.C., as well as along the Green and Yellow lines of the D.C. Metro. A larger portion of families reside in the center of D.C., particularly in the Columbia Heights and Petworth neighborhoods, and these areas also have higher job market values.

*Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.*

Consultation of local policies and data can help inform and place into context the HUD-provided statistics on employment in D.C. While the national unemployment rate January-March of this year has ranged between 3.8% and 4.0%, the rates for January and February 2019 in D.C. have been higher than the national average, ranging between 5.4-5.5%. Specifically, Wards 7 and 8 have experienced even higher unemployment numbers this year, at 8.8% and 11.5%, respectively.<sup>32</sup> The districtwide rates also lag behind statewide rates in neighboring Virginia (2.8-2.9%) and Maryland (3.7, 3.7%), which make up a significant portion of the Region. According to the 2013-2017 American Community Survey 5-Year Estimates, D.C. had a labor force participation rate of 69.5% as opposed to 71.7% for the region. Meanwhile, the state of Maryland saw 68.1% participation, and Virginia saw 66.1%.

Subject to high margins of error, the American Community Survey reports, as of 2013-2017 (and thus capturing worse employment conditions than those that are currently present), unemployment rates of 3.0% for White workers, 15.4% for Black workers, 2.3% for Asian American workers, 12.5% for Pacific Islander workers (ACS data does not combine these measures), and 5.7% for Hispanic workers. The 1<sup>st</sup> Quarter 2018 and 1<sup>st</sup> Quarter 2019 data for the whole country, disaggregated by race, indicates that D.C. is an outlier in its unemployment metrics broken down by race, specifically with regard to Black residents. White unemployment was 3.0-3.7 (1<sup>st</sup> Quarter 2018, 1<sup>st</sup> Quarter 2019). Black unemployment was 7.3-7.1. Asian unemployment was 3.0-3.1. Hispanic unemployment was 5.4-5.1. This disproportionality as compared to the national statistics is likely at least partially driven by the relatively larger Black population in D.C. However, the large gaps in the Opportunity Indices that have been discussed show that in addition to larger numbers, the results of systemic oppression continue to have a large influence on opportunity outcomes for Black residents.

A variety of District programs seek to connect disproportionately Black and Hispanic low-income workers to opportunities for employment and professional advancement. The D.C. Department of Employment Services runs several programs and resource centers, including Apprenticeship D.C., Project Empowerment, the American Job Center, L.E.A.P. (Learn, Earn, Advance, Prosper), First Source, D.C. Infrastructure Academy, and the Mayor Marion S. Barry Summer Youth Employment Program. Recent reporting has cast doubt on the efficacy of some of these programs, alleging that people being “trained” by these programs in reality supply low cost labor to various District government projects for the majority of their term.<sup>33</sup> The reporting also highlighted the frustrations of participating in these programs with the expectation of a permanent job at the end, only to be disappointed when no permanent job is made available. Of the 500 participants in the D.C. Infrastructure Academy, for example, only about 40% of them found permanent jobs after their training.

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<sup>32</sup> <https://www.washingtoncitypaper.com/news/loose-lips/article/21066959/participants-in-a-disastrous-dc-workforce-development-program-still-lack-employment>

<sup>33</sup> <https://www.washingtoncitypaper.com/news/loose-lips/article/21066959/participants-in-a-disastrous-dc-workforce-development-program-still-lack-employment>

## Transportation

*For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and Region.*

**Table 1: Opportunity Indicators by Race/Ethnicity, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

<b>Washington, D.C.</b>	<b>Low Transportation Cost Index</b>	<b>Transit Index</b>
<b>Total Population</b>		
White, Non-Hispanic	97.18	95.15
Black, Non-Hispanic	96.22	94.80
Hispanic	97.37	95.81
Asian or Pacific Islander, Non-Hispanic	97.61	95.43
Native American, Non-Hispanic	96.75	94.94
<b>Population below federal poverty line</b>		
White, Non-Hispanic	97.56	95.35
Black, Non-Hispanic	96.55	94.99
Hispanic	97.58	95.96
Asian or Pacific Islander, Non-Hispanic	98.33	95.66
Native American, Non-Hispanic	96.40	94.88
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>		
<b>Total Population</b>		
White, Non-Hispanic	83.32	80.51
Black, Non-Hispanic	88.79	86.58
Hispanic	89.48	87.67
Asian or Pacific Islander, Non-Hispanic	87.68	87.03
Native American, Non-Hispanic	85.35	81.93
<b>Population below federal poverty line</b>		
White, Non-Hispanic	85.09	81.18
Black, Non-Hispanic	92.80	90.44
Hispanic	91.62	89.52
Asian or Pacific Islander, Non-Hispanic	91.08	89.32
Native American, Non-Hispanic	89.80	86.83

As indicated by the transportation indices above, across every racial and ethnic group (with negligible differences below the poverty line), D.C. residents have extremely high access to transportation. D.C. is served by a number of public transportation options, the most prominent being the MetroBus and MetroRail. The MetroBus operates 325 routes with 11,500 bus stops

throughout D.C., Maryland, and Virginia.<sup>34</sup> The fares range from \$2.00 for regular routes to \$4.25 for express routes. For those with disabilities and seniors, the fare is \$1.00 for regular routes and \$2.10 for express routes. The MetroRail operates on 6 lines that expand outward from the city center throughout D.C. and further into Virginia and Maryland. The fare for each trip on the MetroRail is determined by the distance between certain stops, with price increases during “peak hours.” The prices generally range from \$1.85-\$3.85 during off-peak hours, and \$2.25 to \$6 during peak hours.<sup>35</sup> Both MetroBus and MetroRail offer reduced fares for seniors and those with disabilities. These lines are extensive, and provide access to the majority of services residents might need. Most notably, the Bus Transformation Project found that 75% of low-income households have access to high-frequency bus service during peak hours, and that 94% of jobs in D.C. are within a quarter mile of high-frequency peak bus service.<sup>36</sup> In addition, 44 MetroRail stations offer parking for those who may need to utilize multiple modes of transportation.

Beyond the main MetroBus and MetroRail service, the District also offers several alternative bus and rail services. The D.C. Streetcar runs along the H Street Corridor. The Streetcar operates on a limited route that “runs east starting from Union Station toward Oklahoma Avenue and west starting at the Benning Road/Oklahoma Avenue stop.”<sup>37</sup> It is free to ride, and the Streetcar makes stops every 10-15 minutes. All streetcars are ADA accessible. Hours of operation are Monday-Thursday, 6am to 12 am; Fridays, 6 am to 2am; Saturdays, 8am to 2am; and Sundays, 8am- to 10pm. In addition, as of January of this year, the D.C. Circulator offers free transit throughout the business and entertainment centers of the region, with stops every 10 minutes. All buses are ADA accessible. The routes run from Dupont Circle to Rosslyn, Georgetown to Union Station, Woodley Park to Adams Morgan and McPherson Square, Eastern Market to L’Enfant Plaza, Congress Heights to Union Station, and along the National Mall.

Lastly, D.C. is also served by the public bicycle sharing service Capital Bikeshare. Capital Bikeshare is owned by D.C. and several surrounding jurisdictions<sup>38</sup> and offers the use of 3,000 bikes at 300 stations around D.C. and the region.<sup>39</sup> Users can use the bikes free of charge for the first 30 min, and then payment options range from day passes to year-long passes.

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<sup>34</sup> <https://www.wmata.com/service/bus/>

<sup>35</sup> <https://washington.org/navigating-dc-metro>

<sup>36</sup> <https://ggwash.org/view/70067/five-things-we-learned-from-washington-dc-region-bus-report>

<sup>37</sup> <https://washington.org/dc-guide-to/dc-streetcar>

<sup>38</sup> <https://help.capitalbikeshare.com/hc/en-us/articles/115000257991-What-is-Capital-Bikeshare->

<sup>39</sup> <https://washington.org/dc-guide-to/how-do-i-get-around-washington-dc>

**Map 1: WMATA MetroRail Lines**



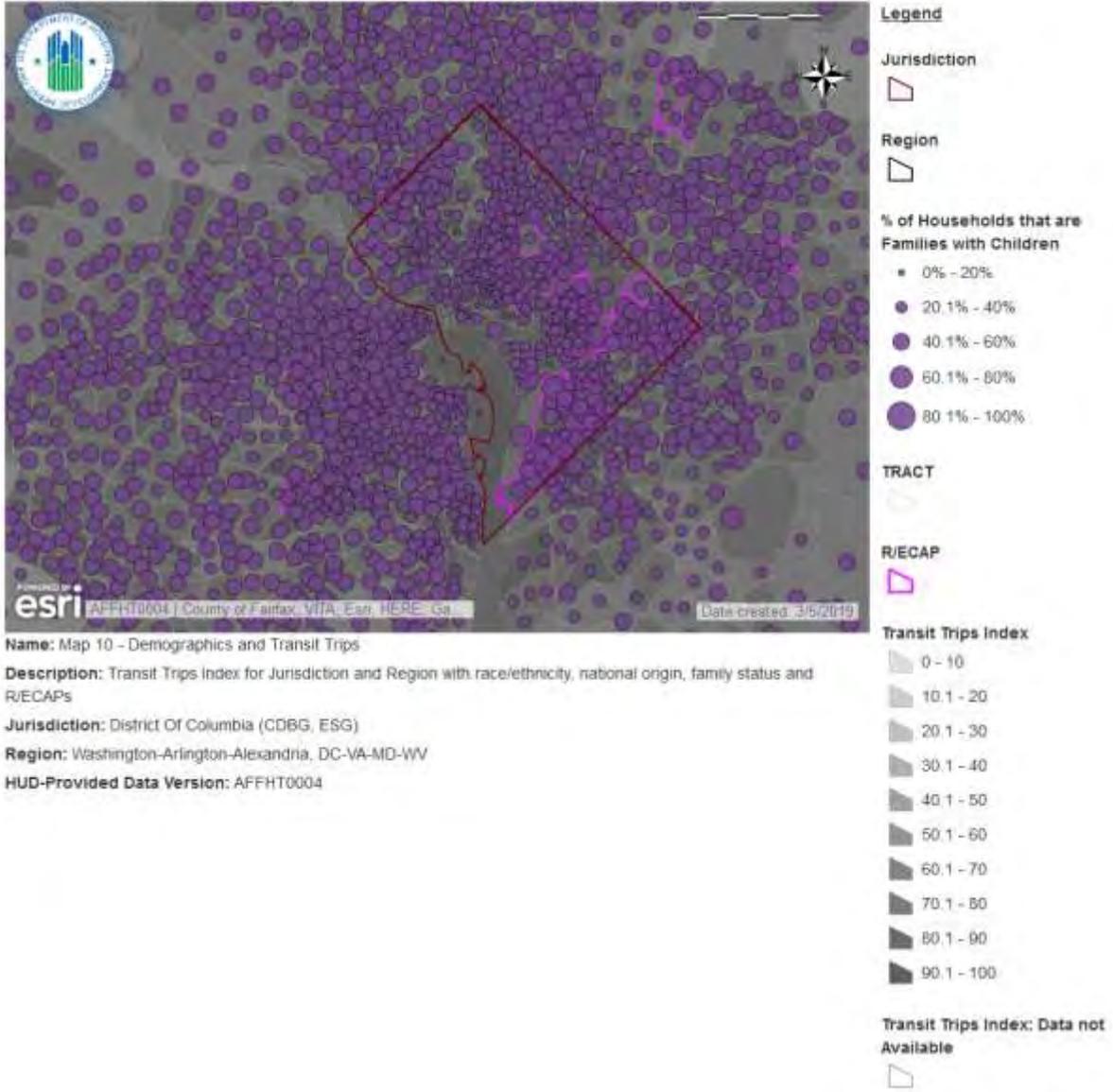
**Map 2: WMATA Bus & MetroRail Overlay**



HUD's Transit Trips Index, as shown in Maps 3 through 6, displays the utilization of public transit by census tract, with higher numbers indicating a higher rate of use. Throughout D.C., access to transportation is consistently high. Transit Trip Indices range from 80-100. WMATA Metro lines leading out of the city clearly indicate areas with the highest levels of access to transportation, but the District's robust bus system provides high levels of access to the entire area. No clear disparities exist in terms of access to transportation or transportation cost.

### Map 3: Demographics and Transit Trips (Family Status), D.C.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



# Map 4: Demographics and Transit Trips (Race/Ethnicity), D.C.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Legend**

**Jurisdiction**



**Region**



**Demographics 2010**

1 Dot = 100

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

**TRACT**

**R/ECAP**



**Transit Trips Index**

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

**Transit Trips Index: Data not Available**



**Name:** Map 10 - Demographics and Transit Trips

**Description:** Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

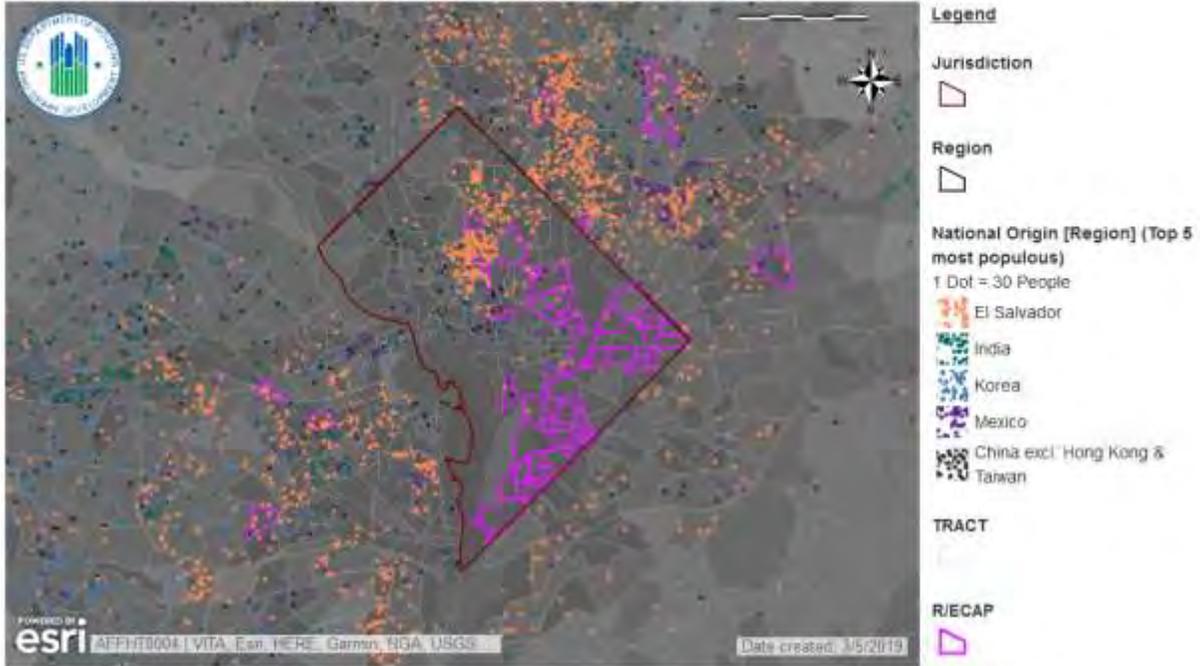
**Jurisdiction:** District Of Columbia (CDBG, ESG)

**Region:** Washington-Arlington-Alexandria, DC-VA-MD-WV

**HUD-Provided Data Version:** AFFHT0004

## Map 5: Demographics and Transit Trips (National Origin), D.C.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 10 - Demographics and Transit Trips

**Description:** Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

**Jurisdiction:** District Of Columbia (CDBG, ESG)

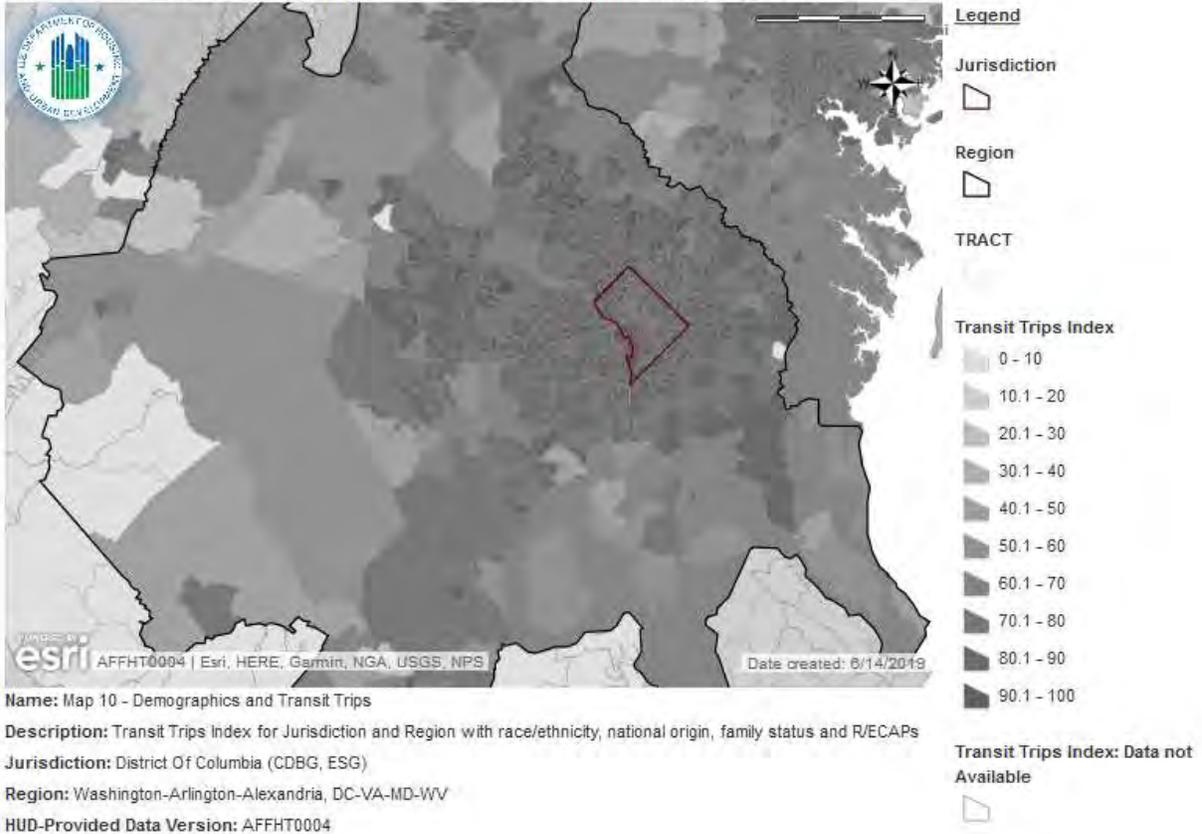
**Region:** Washington-Arlington-Alexandria, DC-VA-MD-WV

**HUD-Provided Data Version:** AFFHT0004



# Map 6: Demographics and Transit Trips, Region

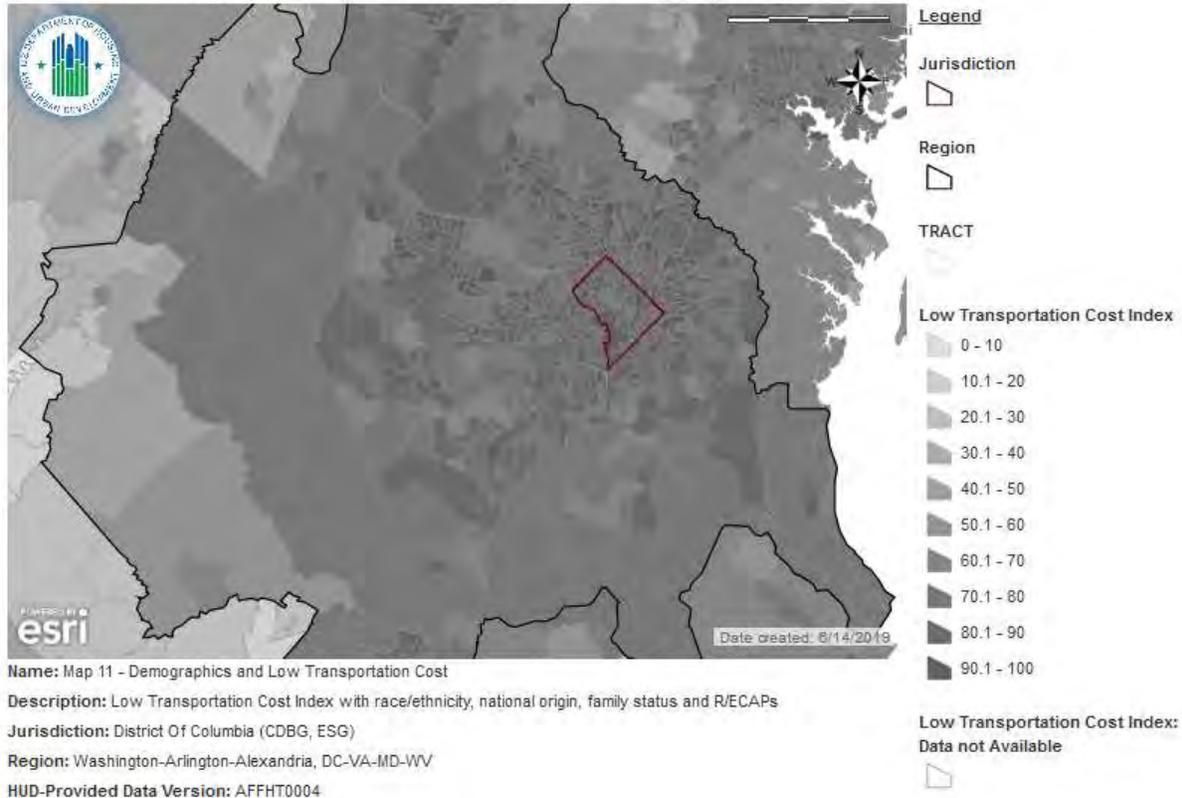
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## Map 7: Demographics and Low Transportation Cost, Region

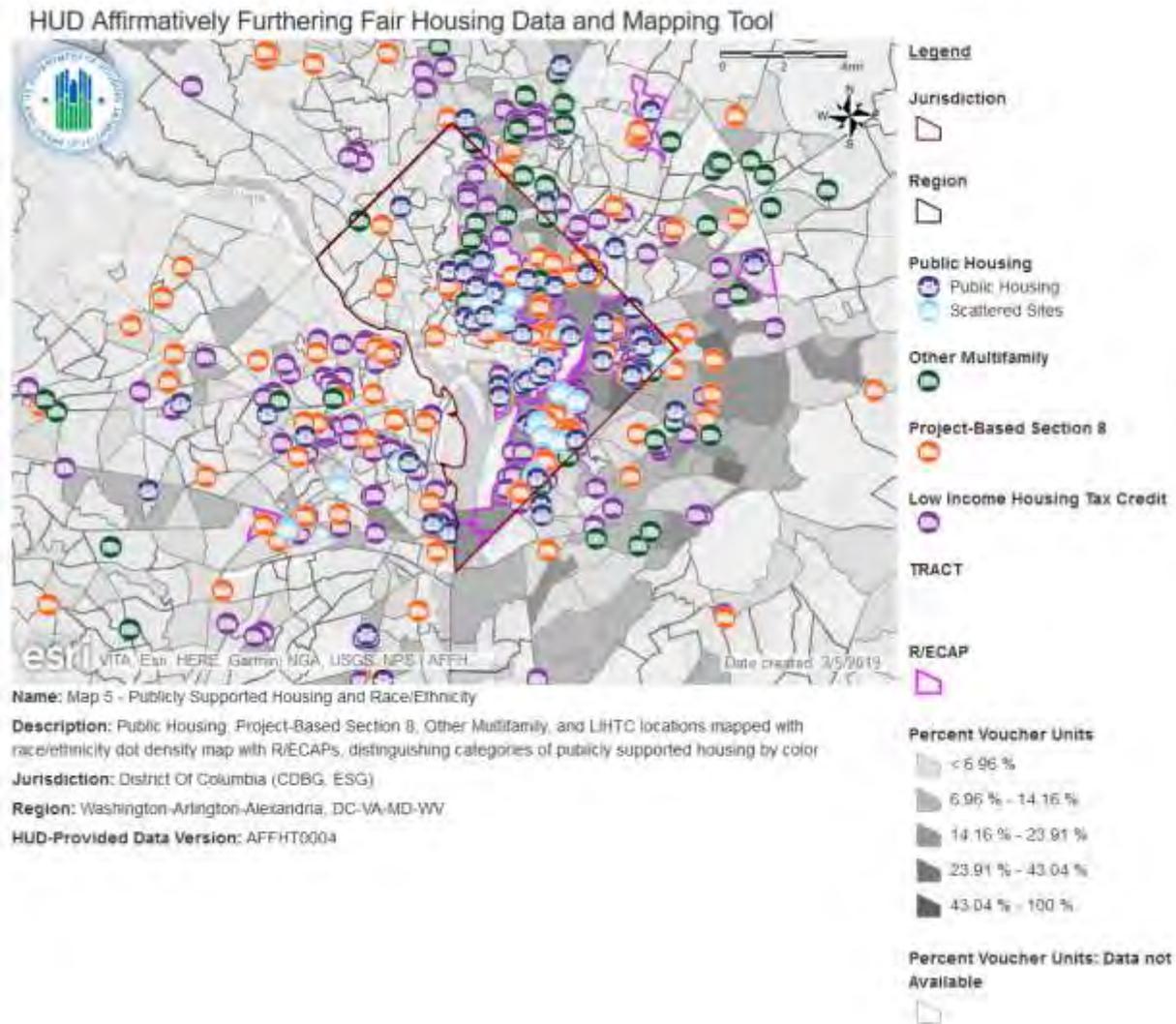
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



*For the protected class groups HUD has provided data, describe how disparities in access to transportation relate to residential living patterns in the jurisdiction and Region.*

As has been demonstrated by index data and the maps displayed above, D.C. has consistent and strong transportation options across the city. There do not appear to be any disparities in Transit Trip Indices correlated to racial or ethnic patterns. Areas with slightly lower Transit Trip Indices seem to be correlated more with lower population density, but all neighborhoods of D.C. are well served by affordable transportation. As previously mentioned, a strong majority of families have access to public transportation and an even stronger majority of jobs are accessible by high-frequency public transit. However, as rents continue to rise within D.C., displacement of low-income communities of color to farther out sections of the metro area may result in more difficulty reaching frequent and convenient modes of public transit.

## Map 8: Publicly Supported Housing, D.C.



*Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.*

With regard to transportation policy, the cost of the MetroRail and MetroBus have been at the forefront of local discussion for some time now. There was a bill to decriminalize fare evasion, which currently carries penalties of “potential arrest, fines up to \$300 and up to 10 days in jail.”<sup>40</sup> Those pushing the bill argued that the criminalization disproportionately affected Black residents, as a report showed that between January 2016 and February 2018, 91% of citations and summons for fare evasion were issued to Black residents.<sup>41</sup> Mayor Bowser and Metro

<sup>40</sup> [https://www.washingtonpost.com/transportation/2019/01/16/mayor-bowser-vetoes-dc-council-bill-decriminalizing-metro-fare-jumping/?noredirect=on&utm\\_term=.140577e9cef2](https://www.washingtonpost.com/transportation/2019/01/16/mayor-bowser-vetoes-dc-council-bill-decriminalizing-metro-fare-jumping/?noredirect=on&utm_term=.140577e9cef2)

<sup>41</sup> Id.

officials opposed the bill based on the costs to the system for lack of fare payment. Despite the City Council voting to decriminalize, Mayor Bowser vetoed the bill when it got to her desk. In turn, the City Council voted to override the Mayor's veto and under the new Fare Evasion Decriminalization Act, the penalty will now be a \$50 civil fine.<sup>42</sup>

The expansive community engagement conducted for this analysis revealed several transit-related grievances. Participants expressed the need for more transit oriented communities and transit-oriented design. In addition, seniors and those with disabilities stated a need for covered bus stops and benches for the cold and hot months. Other participants cited transportation as a barrier to various services. For example, a senior citizen mentioned that a neighborhood van used to transport people in different wards to the grocery store. To her knowledge, the van still operates in Wards 4 and 5, but no longer operates in Wards 7 and 8. Others stated that they may want to send their child to a different school but inconvenient transportation options make that infeasible. Lastly, there was a sense that most affordable housing is not located as close to the metro and other services as other housing.

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<sup>42</sup> <https://wamu.org/story/19/01/22/council-overrides-mayoral-veto-fare-evasion-soon-a-50-civil-fine/>

## Access to Low Poverty Neighborhoods

For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and Region.

**Table 1: Opportunity Indicators by Race/Ethnicity, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

<b>Washington, D.C.</b>	<b>Low Poverty Index</b>
<b>Total Population</b>	
White, Non-Hispanic	71.68
Black, Non-Hispanic	31.17
Hispanic	53.69
Asian or Pacific Islander, Non-Hispanic	65.40
Native American, Non-Hispanic	45.21
<b>Population below federal poverty line</b>	
White, Non-Hispanic	69.57
Black, Non-Hispanic	23.61
Hispanic	49.40
Asian or Pacific Islander, Non-Hispanic	67.82
Native American, Non-Hispanic	47.08
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>	<b>Low Poverty Index</b>
<b>Total Population</b>	
White, Non-Hispanic	79.82
Black, Non-Hispanic	61.48
Hispanic	65.00
Asian or Pacific Islander, Non-Hispanic	78.36
Native American, Non-Hispanic	70.71
<b>Population below federal poverty line</b>	
White, Non-Hispanic	70.32
Black, Non-Hispanic	42.62
Hispanic	53.07
Asian or Pacific Islander, Non-Hispanic	66.90
Native American, Non-Hispanic	61.24

In D.C., access to low poverty neighborhoods is linked to patterns of racial and ethnic concentration. Areas with low scores on the Low Poverty Index (translating to “high poverty areas”) are located in the East and South areas of the District, which also tend to have high concentrations of Black residents. This is especially pronounced in the area south of the

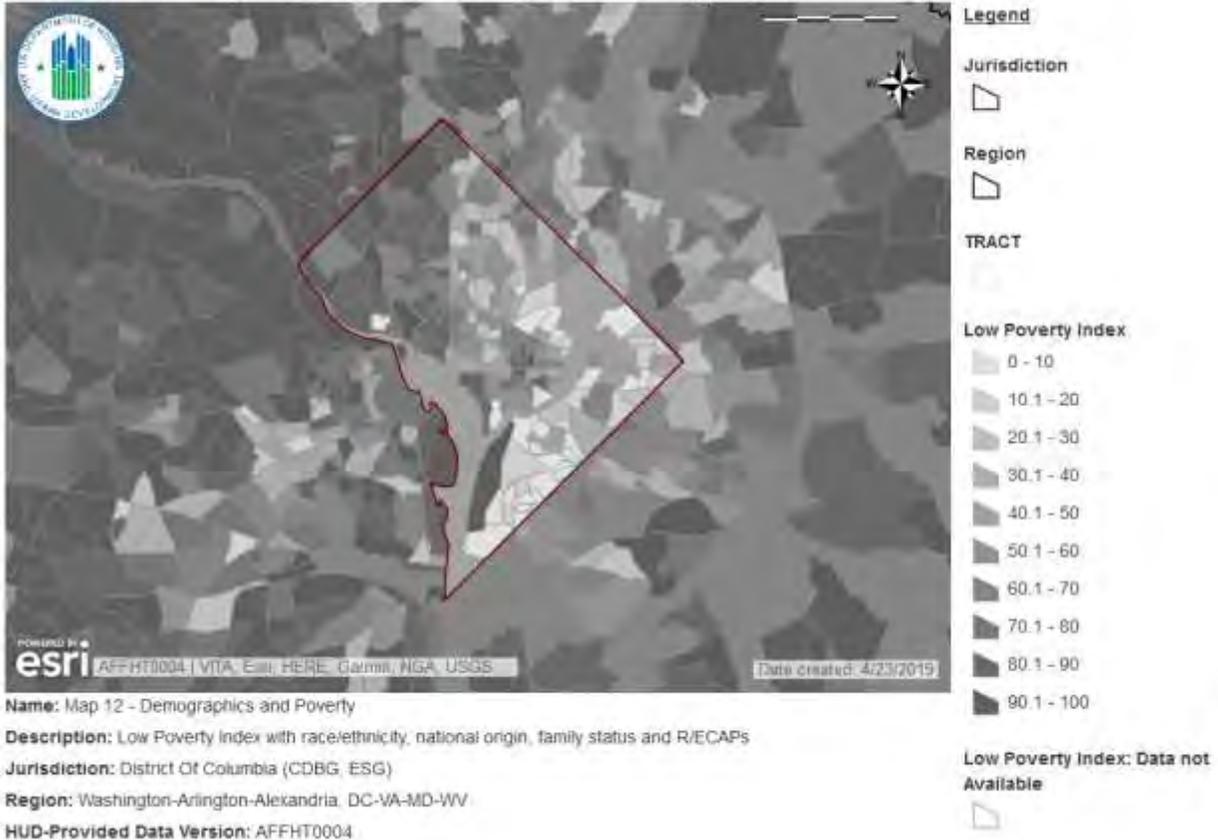
Anacostia River. While neighborhoods in Northwest have Low Poverty Scores as high as 98, neighborhoods in Southeast rank in the single digits. Index levels also indicate the severe disparity in access to low poverty neighborhoods based on racial group. The higher the index score, the less exposure to poverty in a neighborhood. In D.C., White residents have the best access to low poverty neighborhoods, with an index value of 71.68. Between Black and White residents, there is a 40 point difference, with Black residents scoring 31.17 on the index. The other groups range in the middle, with Hispanics at 53.69, Asian American and Pacific Islanders at 67.82, and Native Americans at 47.08. For residents below the poverty line, these levels are roughly similar, with the exception of Black residents, which falls an additional 8 points. In fact, the values for both Asian American and Pacific Islanders and Native Americans actually rise by about 2 points each.

Regionally, every group experiences higher values on the low poverty index, likely due at least in part to less severe segregation patterns across the region as a whole. Most notably, the value for Black residents doubles, from 31.17 to 61.48. Other groups increased between 9 and 25 points, with 79.82 for White residents, 65.00 for Hispanic residents, 78.36 for Asian Americans and Pacific Islanders, and 70.71 for Native Americans. For those below the poverty line, there are much larger differences in the region than the differences exhibited by the D.C. values. White residents maintain a similar rate at 70.32. Black residents drop nearly 20 points to 42.62, which still outpaces low poverty rates in D.C. Hispanics, Asian Americans and Pacific Islanders, and Native Americans each lose 10+ points, at 53.07, 66.90, and 61.24, respectively.

*For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and Region.*

**Map 1: Demographics and Poverty. Washington, D.C.**

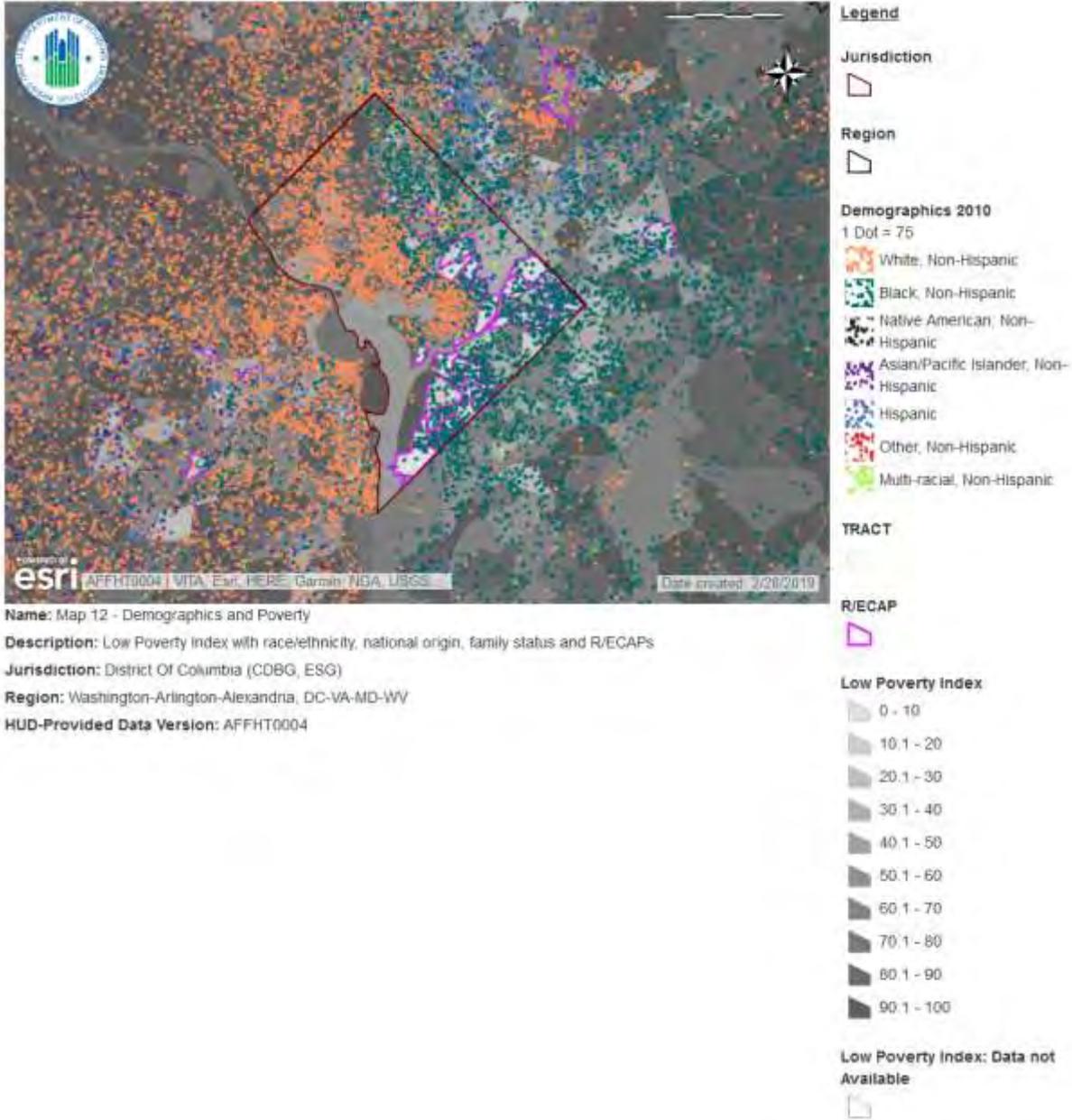
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



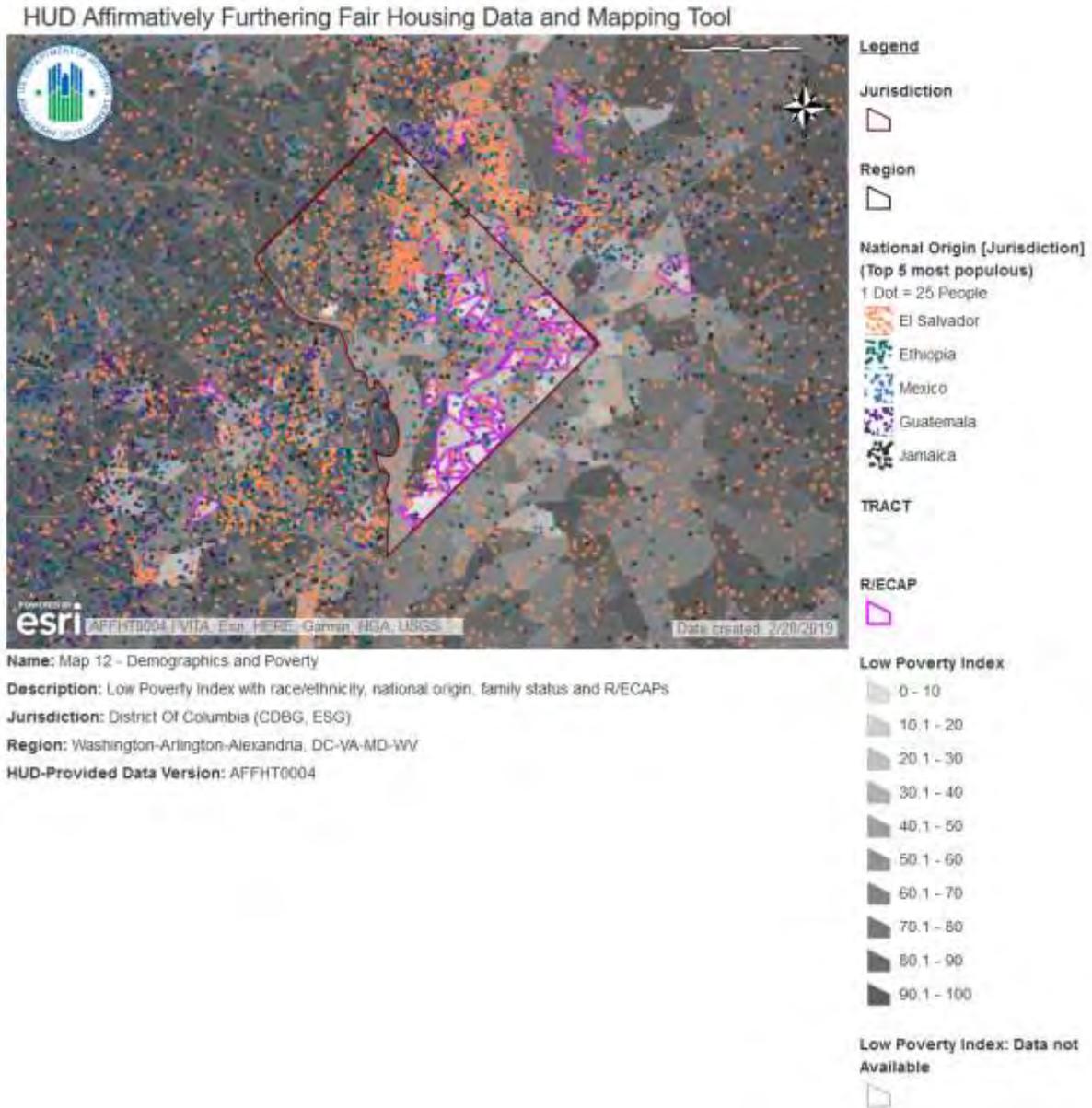
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## Map 2: Demographics and Poverty (Race/Ethnicity), Washington, D.C.

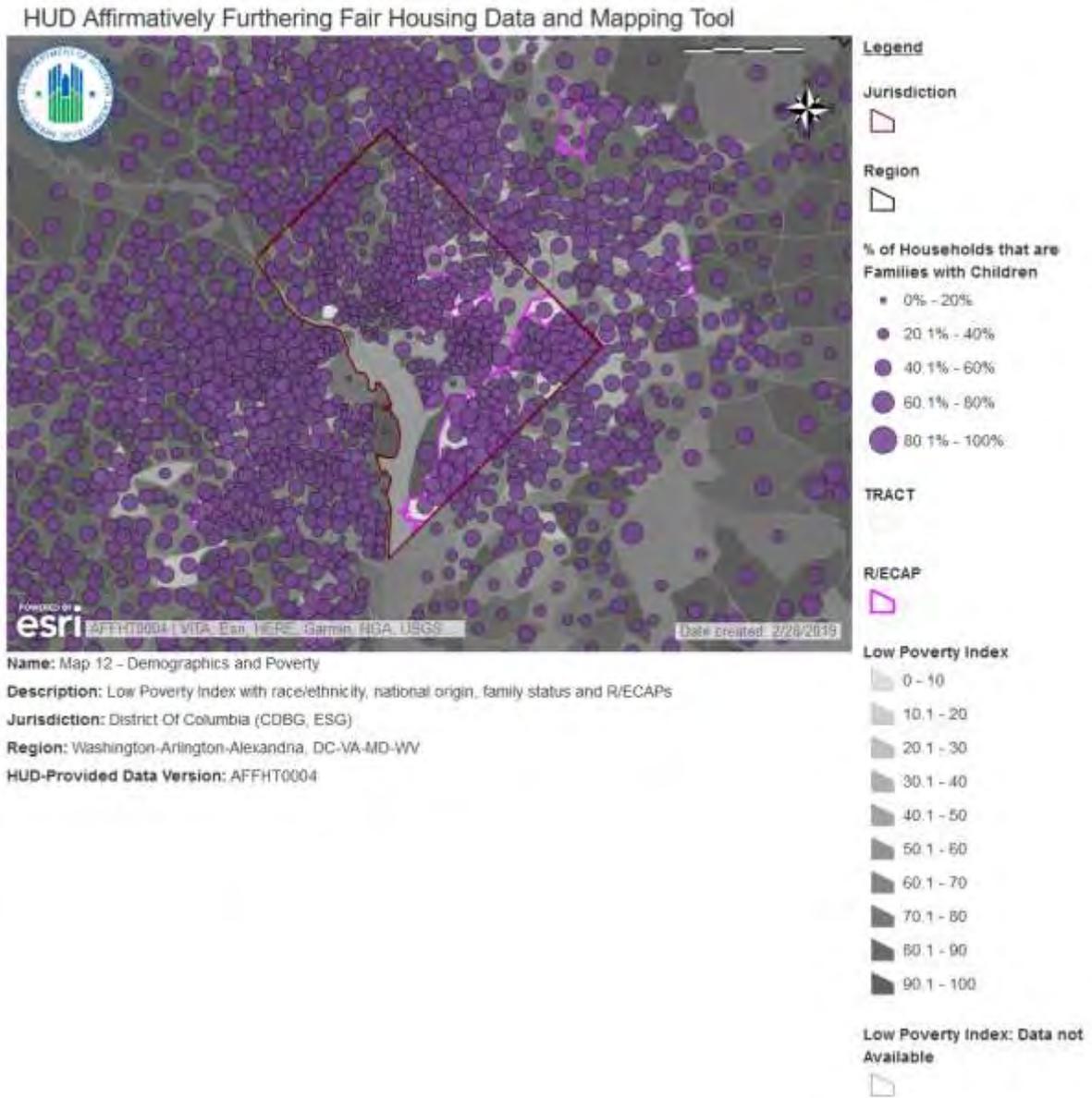
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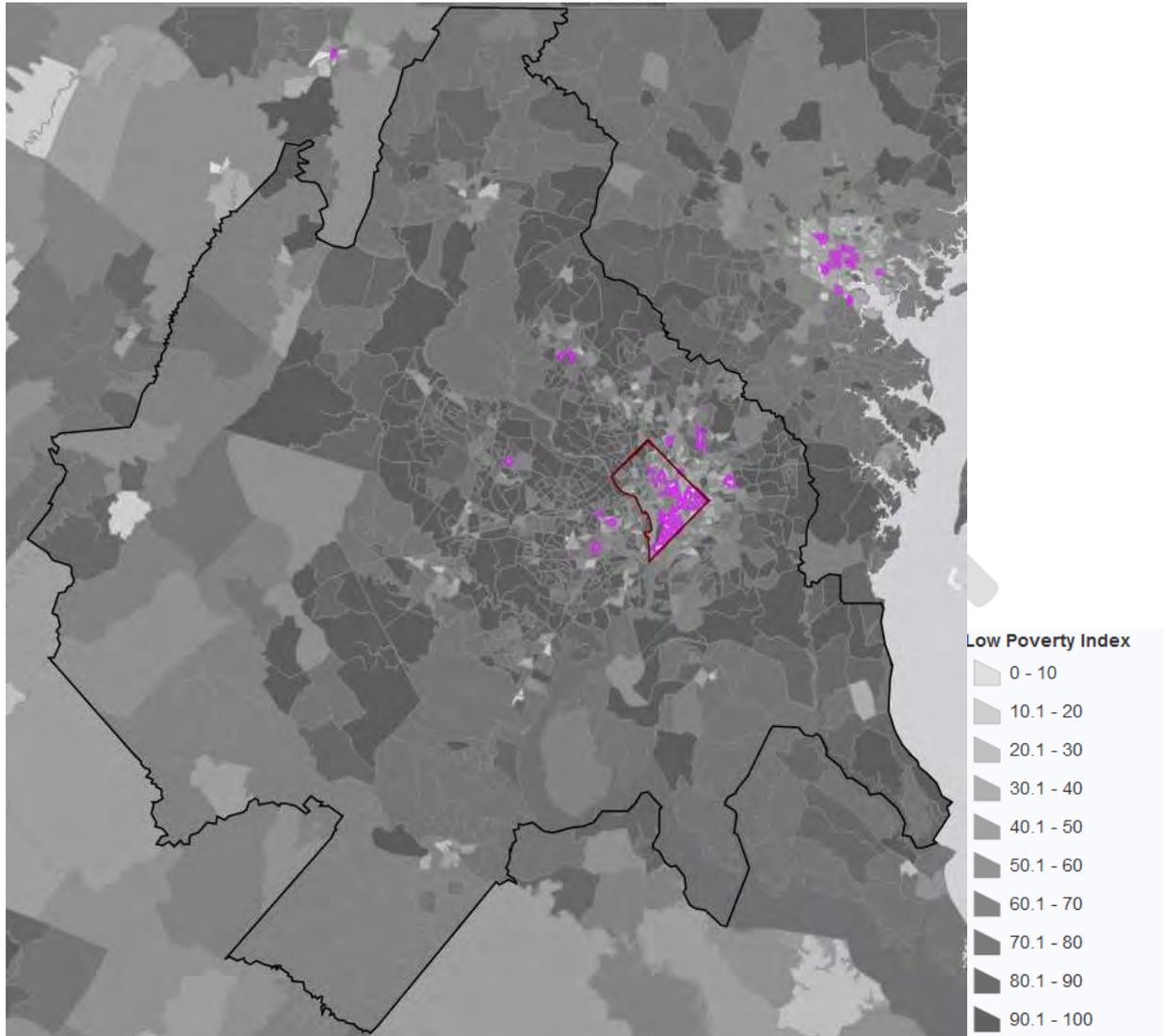
### Map 3: Demographics and Poverty (National Origin), Washington, D.C.



**Map 4: Demographics and Poverty (Family Status), Washington, D.C.**



### Map 5: Demographics and Poverty, Region



Access to low poverty neighborhoods is closely linked to residential patterns of racial and ethnic concentration in D.C. Areas with the highest poverty levels are east of the Anacostia River, indicating patterns of poverty along extreme lines of segregation, as the majority of residents in this part of D.C. are Black. So, too, is Northeast (west of the Anacostia River), though to a lesser extreme. 16<sup>th</sup> Street Heights and Petworth, which have high Salvadoran populations, have middling Low Poverty Indices compared to areas west of the Rock Creek Park, which have overwhelmingly high Low Poverty Indices. By contrast, areas to the west of 16<sup>th</sup> street have consistently high Low Poverty Indices, and are also majority White; Capitol Hill also follows this trend.

*Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.*

In addition to the very stark line dividing low poverty and high poverty neighborhoods, it should be noted that the HUD-provided data may not accurately reflect poverty levels due to HUD's reliance upon the federal poverty level. The federal poverty level downplays the true extent of poverty in the Region. Metrics that adjust for housing costs routinely show D.C. to be one of the highest poverty states (District of Columbia) in the country. This means that, for example, if a family of four in Washington, D.C. has an income of \$30,000 (above the federal poverty level of \$25,100), they are still living in poverty. In order to afford a one-bedroom apartment at fair market rent, a minimum wage worker would need to work 91 hours a week.

The District has taken steps to compensate for this gap between income and the cost of living by adopting policies that increase wages more aggressively than neighboring states. As part of the Living Wage Act, the minimum wage will raise to \$15 per hour in D.C. in July 2020.<sup>43</sup> Tipped workers will have a minimum wage of \$5 per hour in 2020. In neighboring Virginia, the minimum wage is equal to the federal minimum wage, \$7.25/hour. In Maryland, the minimum wage is \$10.10, and a law was recently passed to gradually increase the minimum wage to \$15 over the course of the next half decade. The District also has mandated paid family leave and paid sick leave requirements, which vary slightly depending on the size of the employer.

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<sup>43</sup> <https://does.dc.gov/service/office-wage-hour-compliance>

## Access to Environmentally Healthy Neighborhoods

*For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and Region.*

**Table 1: Opportunity Indicators by Race/Ethnicity, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

<b>Washington, D.C.</b>	<b>Environmental Health Index</b>
<b>Total Population</b>	
White, Non-Hispanic	9.33
Black, Non-Hispanic	12.33
Hispanic	8.17
Asian or Pacific Islander, Non-Hispanic	7.97
Native American, Non-Hispanic	10.80
<b>Population below federal poverty line</b>	
White, Non-Hispanic	8.27
Black, Non-Hispanic	12.40
Hispanic	7.58
Asian or Pacific Islander, Non-Hispanic	6.00
Native American, Non-Hispanic	9.19
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>	
<b>Total Population</b>	
White, Non-Hispanic	34.67
Black, Non-Hispanic	25.81
Hispanic	23.41
Asian or Pacific Islander, Non-Hispanic	26.10
Native American, Non-Hispanic	32.85
<b>Population below federal poverty line</b>	
White, Non-Hispanic	32.47
Black, Non-Hispanic	19.79
Hispanic	20.29
Asian or Pacific Islander, Non-Hispanic	21.38
Native American, Non-Hispanic	24.85

In D.C., access to environmentally healthy neighborhoods is low for all racial and ethnic groups with negligible differences in Environmental Health Indices across the city. Similarly, the differences in index values across racial groups is negligible within D.C., ranging from 7.97-12.33 for the total population and 6.00-12.40 for residents under the poverty line. The Environmental Health Index is the only Opportunity Index for which Black residents actually

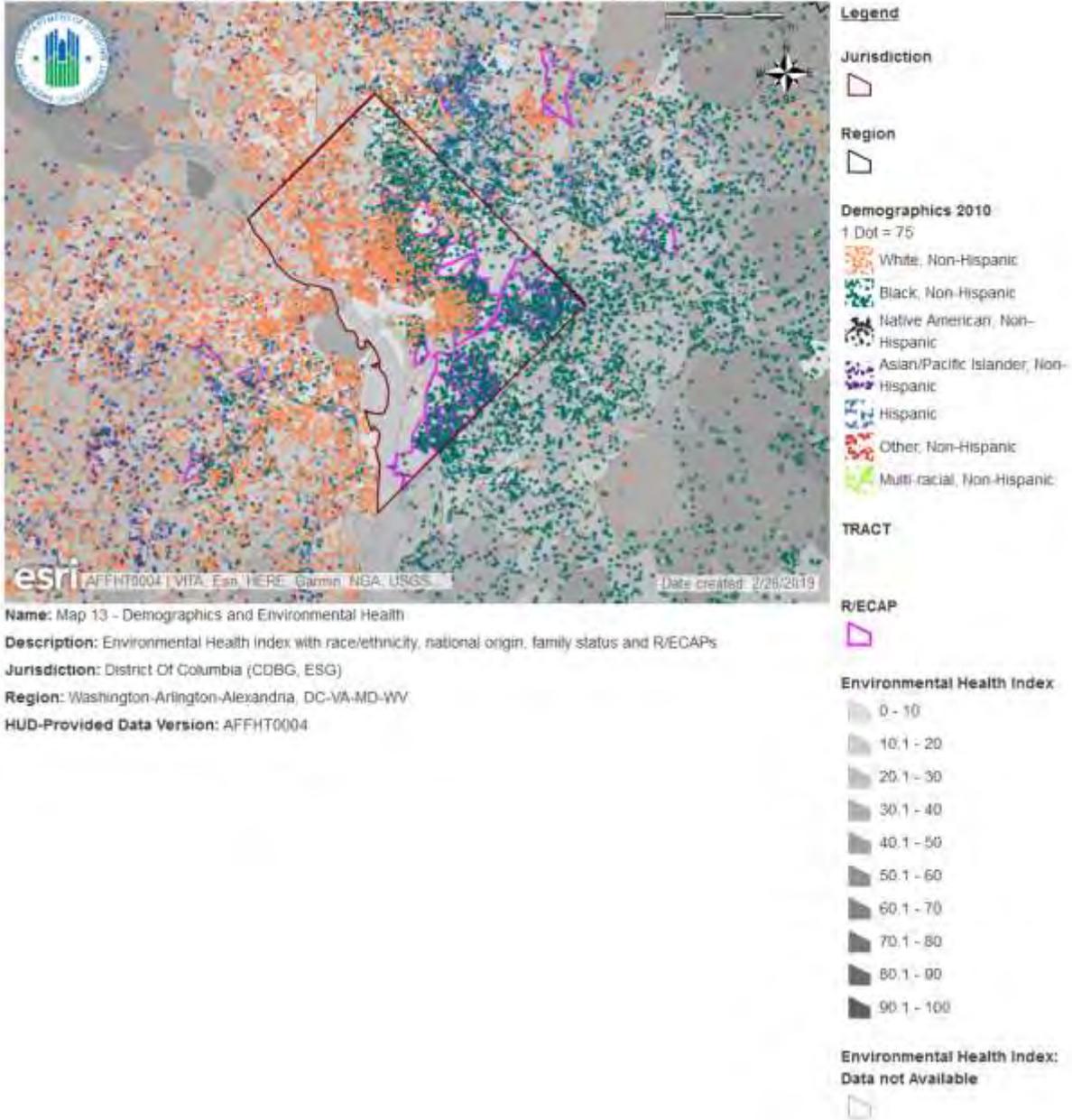
score higher than White residents, at 12.33 and 9.33, respectively. Native Americans also score higher than White residents, at 10.80. This distribution holds true for residents under the poverty line. The areas across the river in Anacostia have similar environmental health score to the areas in Northwest D.C., which are predominantly Black and predominantly White, respectively. These marginally higher scores are likely due to less transit in those areas.

Regional values are about three times as high as those in the D.C., incorporating suburban and rural areas. Racial differences are more pronounced at the regional level, with White residents experiencing a 34.67 value on the environmental health index, versus 25.81 for Black residents, 23.41 for Hispanic residents, 26.10 for Asian American or Pacific Islanders, and 32.85 for Native Americans. Regionally, residents living below the poverty line experience similar environmental health levels, with a score of 32.47 for White residents, 19.79 for Black residents, 20.29 for Hispanics, 21.38 for Asian American or Pacific Islanders, and 24.85 for Native Americans. The racial disparities in the Region are probably traceable to urban-suburban living patterns across low income minorities and comparatively wealthier non-Hispanic White residents.

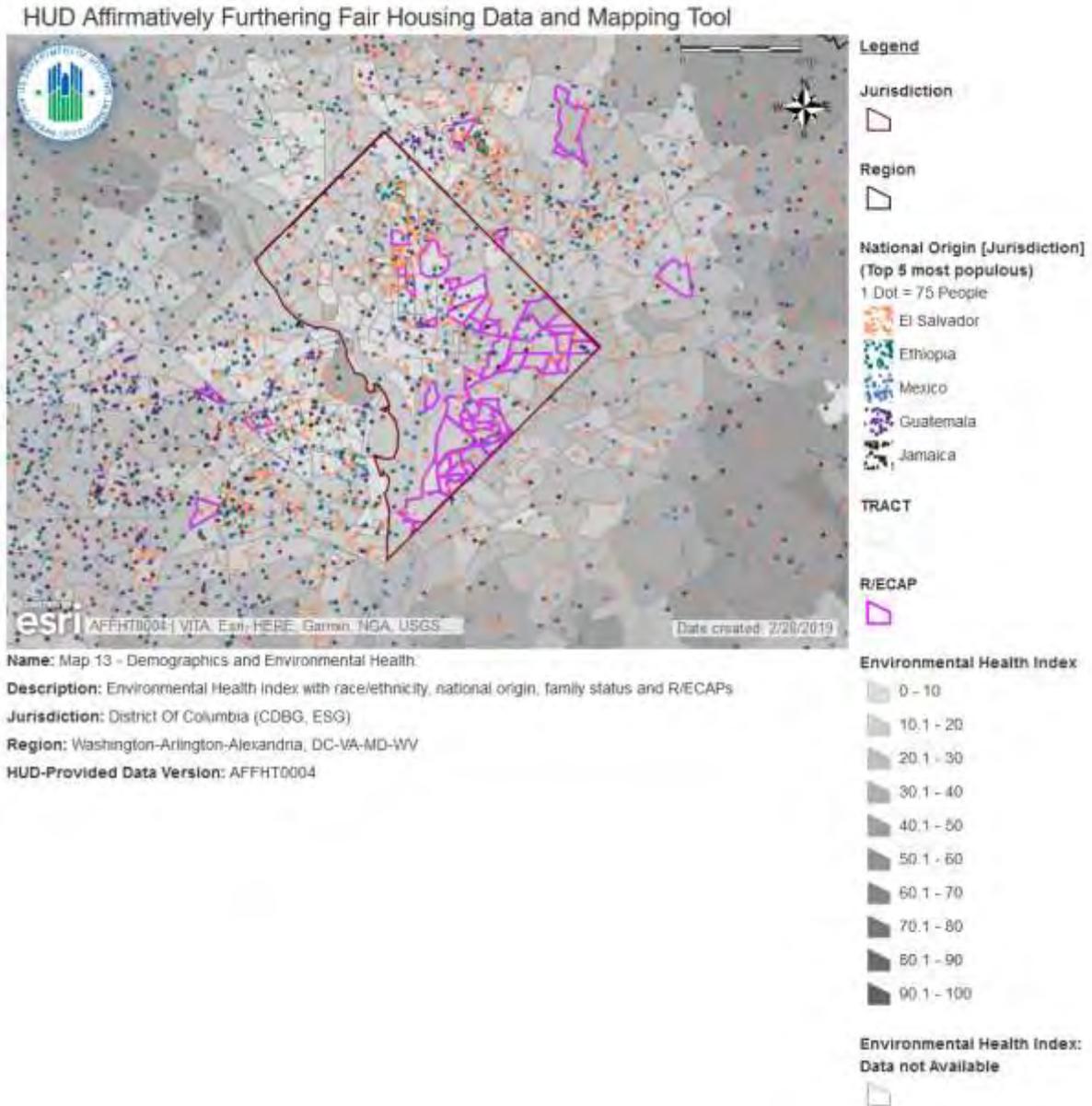
*For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and Region.*

# Map 1: Demographics and Environmental Health (Race/Ethnicity), Washington, D.C.

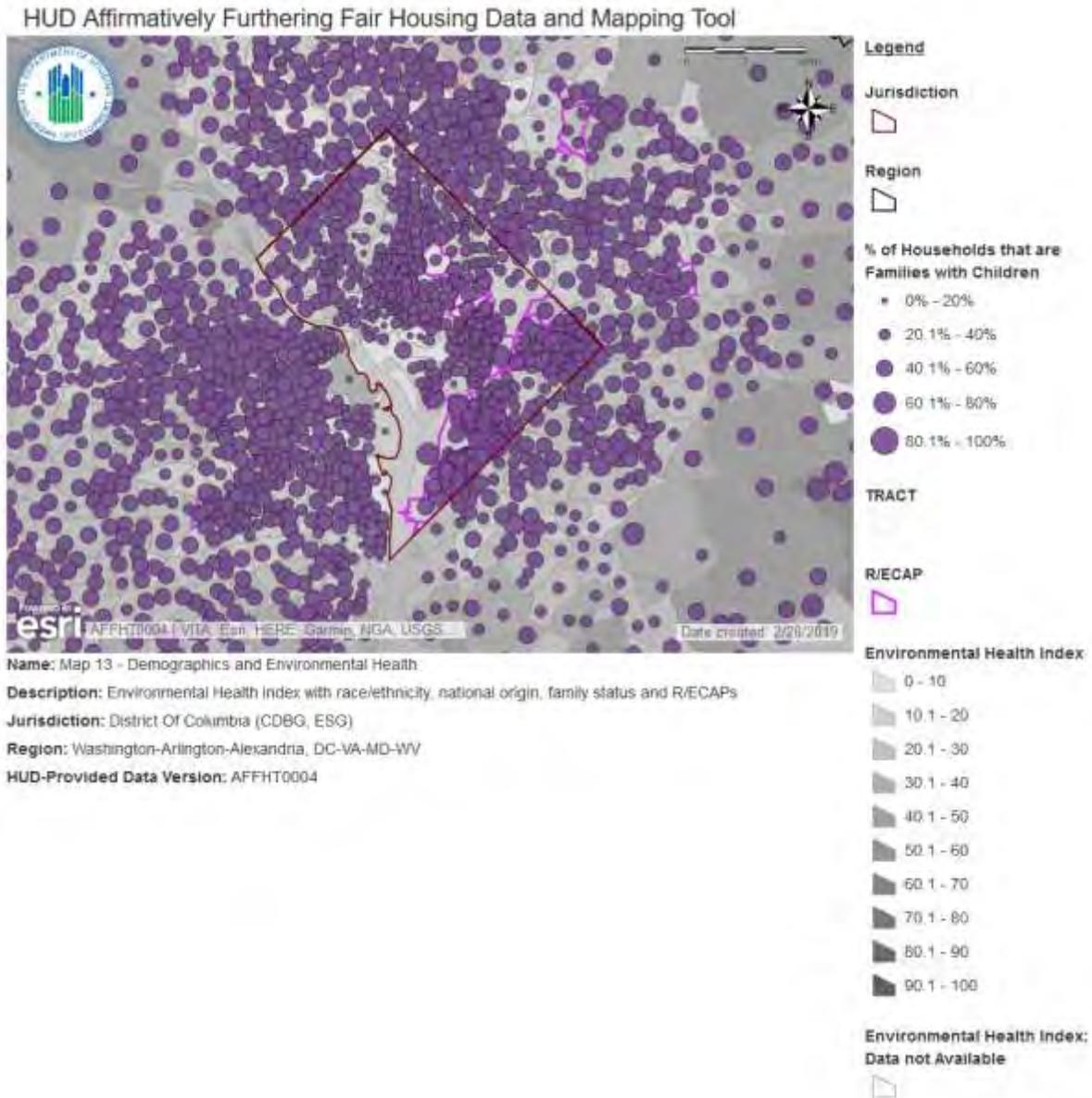
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



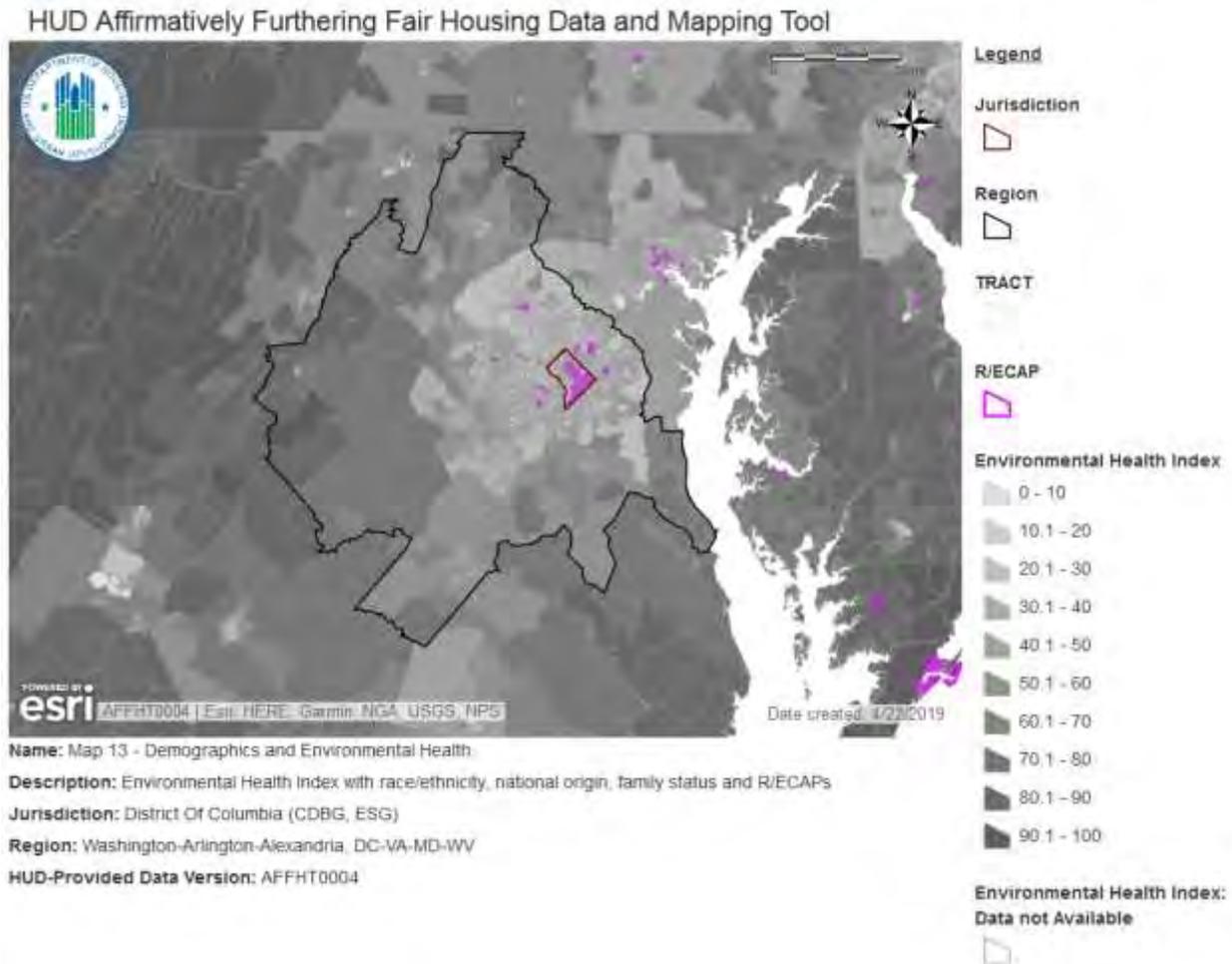
## Map 2: Demographics and Environmental Health (National Origin), Washington, D.C.



**Map 3: Demographics and Environmental Health (Family Status), Washington, D.C.**



## Map 4: Demographics and Environmental Health, Region



The maps above indicate that areas west of Rock Creek Park and east of the Anacostia River, which are less dense than city center, have slightly higher Environmental Health Indices than the rest of the District. Northwest D.C. contains more greenspace than the rest of D.C., especially in the neighborhoods by Rock Creek Park. So too, does the area of D.C. east of the Anacostia River, which may explain why these areas have slightly higher Environmental Health Indices. Predominantly Black residents in Anacostia, usually have to bear the brunt of environmental impacts, but it is not so in this case.

*Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.*

Although HUD's Environmental Health Index does not reflect significant disparities in access to environmentally healthy neighborhoods within Washington, D.C., there are several significant environmental problems within the District that affect vulnerable populations and merit discussion here. The Region has consistently ranked in the Top Ten Worst Cities in terms of air

pollution. According to the American Lung Association State of the Air Report (2018), Washington, D.C. received an “F” grade for high ozone (smog) days.<sup>44</sup> However, it received a “B” grade for particle pollution.

The Anacostia and Potomac Rivers are also severely polluted. A goal of achieving a swimmable and fishable Anacostia River has been set for the year 2025.<sup>45</sup> However, some residents of Ward 8 (Anacostia) have expressed concerns that as the river is targeted for cleanup, housing prices will rise and gentrification pressures will push out low-income communities of color.<sup>46</sup>

The map below shows the list of Superfund National Priority Sites in and around D.C. There are not very many sites to speak of (marked by yellow diamonds), but perhaps the most notable is in the Navy Yards area, which has recently seen an explosion of new development and gentrification. Another site is located at Andrews Air Force Base. There are comparatively more Superfund sites near Baltimore, although still not many. Of the general indicators of serious environmental problems in any given area, the lack of Superfund sites is one encouraging factor for the D.C. metro area.

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<sup>44</sup> <https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/district-of-columbia/>

<sup>45</sup> <https://www.anacostiaaws.org/our-watershed/waterway-to-2025.html>

<sup>46</sup> <https://www.npr.org/2018/05/05/608723599/the-consequences-of-cleaning-up-the-anacostia-river>

## Map 5: Superfund Sites, Washington, D.C.

### Superfund National Priorities List (NPL) Where You Live Map



#### Patterns in Disparities in Access to Opportunity

*For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and Region.*

While D.C. does not exhibit significant patterns of disparity when it comes to transportation (most people have very good access) or environment (most people experience similar, but very poor, environmental states), there are significant disparities in the categories of education, poverty, and employment. Education, which is heavily determined by the neighborhood in which students live, is highly segregated in D.C. The stark economic disparities between White and Black residents affects the funding available to neighborhood schools, and clear disparities in quality are highly affected by the racial divide in D.C. Although the city distributes funds across schools based on student need, concentrations of student poverty within schools can have a negative impact on educational outcomes, even accounting for compensatory per pupil funding. Also, additional parental contributions through PTA groups can exacerbate inequalities between

schools, which track the larger geographic racial divide in the city. The poverty analysis follows extremely similar trends. Employment disparities exhibit perhaps the most noticeable trends of any category, with the most extreme disparities in the labor market index across racial and ethnic groups.

*Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.*

As has been discussed, the areas in D.C. with the highest access to opportunity are the neighborhoods in the wealthy, mostly White, western part of D.C. The areas with the lowest opportunity are predominantly east of the Green Line of the Metro and crossing into Maryland, where there are several R/ECAPS and clear segregation lines.

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#### **iv. Disproportionate Housing Needs**

The evaluation of disproportionate housing needs analyzes housing problems such as housing cost burden, overcrowding, substandard kitchen facilities, and substandard plumbing facilities. This analysis compares the rate of these problems across racial and ethnic groups and family status, and draws conclusions about local and regional policies and market trends that might be influencing these data points.

*Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

Within both D.C. and the broader region, it is clear that racial or ethnic minority groups experience higher rates of housing problems, including but not limited to a severe housing cost burden, than do non-Hispanic White households. Among all racial or ethnic groups, Hispanic households are most likely to experience severe housing problems in both D.C. and the region. In Washington, D.C., specifically, Black households are most likely to experience severe housing cost burden; however, in the region, it is Hispanic households.

Overall, the rates at which households experience both housing problems and severe housing problems are similarly higher in D.C. than they are in the region. 40.05% of households in D.C. experience housing problems in comparison to 35.63% of households in the region, a difference of 4.42%. 22.07% of households in D.C. experience housing problems in comparison to 16.66% of households in the region, a difference of 5.41%. These gaps understate the extent to which housing problems are more common and more severe in D.C. than they are in the remainder of the region, as D.C. households are included in regional data. For specific racial and ethnic groups, the picture is quite different. In that context, the gap between D.C. and the region appears larger and more consistent for severe housing problems than it does for housing problems generally.

Perhaps unsurprisingly, families with five or more members experience housing problems at the highest rate, followed by non-family households; small families with four or fewer members experience housing problems at the lowest rate of any household type. With regard to severe cost burden, however, the disparities between small and large families are less pronounced than they are for other types of housing problems. Since larger families are almost invariably exposed to greater levels of overcrowding, it makes sense that severe cost burden accounts for only a small proportion of the disparity in housing problems between large and small families. This pattern holds true at the regional level as well, with the proportion of households experiencing housing problems and severe housing problems remaining fairly consistent.

## Housing Problems

**Table 1: Housing Problems, Washington, D.C., Region**

Disproportionate Housing Needs	(District Of Columbia, DC CDBG, ESG) Jurisdiction			(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
<b>Households experiencing any of 4 housing problems</b>						
<b>Race/Ethnicity</b>						
White, Non-Hispanic	32,455	106,235	30.55%	310,410	1,138,802	27.26%
Black, Non-Hispanic	56,020	121,905	45.95%	239,943	532,405	45.07%
Hispanic	10,685	20,195	52.91%	113,732	206,646	55.04%
Asian or Pacific Islander, Non-Hispanic	4,060	9,375	43.31%	63,929	168,994	37.83%
Native American, Non-Hispanic	310	798	38.85%	1,903	5,183	36.72%
Other, Non-Hispanic	2,060	5,155	39.96%	15,177	39,192	38.72%
Total	105,585	263,650	40.05%	745,065	2,091,290	35.63%
<b>Household Type and Size</b>						
Family households, <5 people	33,730	99,535	33.89%	347,800	1,156,389	30.08%
Family households, 5+ people	6,690	12,735	52.53%	100,964	219,990	45.89%
Non-family households	65,165	151,370	43.05%	296,310	714,889	41.45%
<b>Households experiencing any of 4 Severe Housing Problems</b>						
<b>Race/Ethnicity</b>						
White, Non-Hispanic	14,860	106,235	13.99%	127,866	1,138,802	11.23%
Black, Non-Hispanic	32,710	121,905	26.83%	115,357	532,405	21.67%
Hispanic	7,215	20,195	35.73%	65,694	206,646	31.79%

Asian or Pacific Islander, Non-Hispanic	2,275	9,375	24.27%	31,913	168,994	18.88%
Native American, Non-Hispanic	114	798	14.29%	769	5,183	14.84%
Other, Non-Hispanic	1,015	5,155	19.69%	6,756	39,192	17.24%
Total	58,200	263,650	22.07%	348,415	2,091,290	16.66%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info/resource/4848/affh-data-documentation\).](http://www.hudexchange.info/resource/4848/affh-data-documentation)

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**Table 2: Housing Cost Burden, Washington, D.C., Region**

Households with Severe Housing Cost Burden	(District Of Columbia, DC CDBG, ESG) Jurisdiction			(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region		
				# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	13,250	106,235	12.47%	116,065	1,138,802	10.19%
Black, Non-Hispanic	29,390	121,905	24.11%	101,885	532,405	19.14%
Hispanic	4,560	20,195	22.58%	45,165	206,646	21.86%
Asian or Pacific Islander, Non-Hispanic	1,735	9,375	18.51%	25,210	168,994	14.92%
Native American, Non-Hispanic	105	798	13.16%	683	5,183	13.18%
Other, Non-Hispanic	885	5,155	17.17%	5,918	39,192	15.10%
Total	49,925	263,650	18.94%	294,926	2,091,290	14.10%
<b>Household Type and Size</b>						
Family households, <5 people	15,670	99,535	15.74%	132,714	1,156,389	11.48%
Family households, 5+ people	2,350	12,735	18.45%	28,478	219,990	12.95%
Non-family households	31,930	151,370	21.09%	133,813	714,889	18.72%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
Note 5: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).						

Tables 1 and 2 (above) display HUD-provided data breaking down the proportion of households experiencing housing problems who are subject to overcrowding or incomplete plumbing and kitchen facilities by race or ethnicity. Additionally, the American Community Survey provides more context (see Table 3 below). The data show that overcrowding is much more common than incomplete plumbing and kitchen facilities. Within D.C., 3.6% of households have more than one occupant per room, and, in the region, 3.0% of households have more than one occupant per room. By contrast, just 0.2% of occupied housing units in D.C. and 0.3% of occupied housing units in the region lack complete plumbing facilities, while 0.6% of occupied housing units in the D.C. and 0.5% of occupied housing units in the region lack complete kitchen facilities. In D.C., Asian and Hispanic households experience the highest levels of overcrowding. Most notably, the rate of overcrowding in both D.C. and the region for Hispanics is roughly double the highest rate of overcrowding for any other group. This high rate of overcrowding suggests an intersection between large family size and low income with particularly affects Hispanic households throughout the region.

**Table 3: Percentage of Overcrowded Households by Race or Ethnicity, Washington, D.C. and Region, 2013-2017 American Community Survey**

	Non-Hispanic White Households	Black Households	Asian American or Pacific Islander Households	Native American Households	Hispanic Households
Washington, D.C.	2.05%	3.68%	7.23%	2.32%	13.70%
Region	1.73%	3.27%	5.04%	3.62%	11.47%

*Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

The entirety of D.C. and much of the region are experiencing extreme housing burdens. In D.C. (depending on the zip code), a household would have to earn between \$30-\$48 per hour to afford a two-bedroom apartment at fair market value.<sup>47</sup> The household hourly wage necessary for a market rate residence in D.C. is the second highest in the country (compared state by state, including D.C. as a “state”). Making the D.C. minimum wage (\$13.25 per hour), a person would need to work 91 hours a week to afford a 1-bedroom residence. Regionally, there are a several affluent zip codes, such as McLean, VA and Potomac, MD that also clock-in at \$48/hour to afford fair market rent. However, the average cost across the entire region is lower, overall. It is unsurprising to see lower costs across the region, especially when considering how many people commute into D.C. for work, while choosing to live more cheaply, farther away. It is particularly notable that the fair market rents in the eastern part of D.C. and in the adjacent Maryland counties, which tend to have the highest concentrations of Black residents, also have the lowest rates, requiring a wage of about \$30/hour to afford.

<sup>47</sup> Out of Reach 2018, National Low Income Housing Coalition.

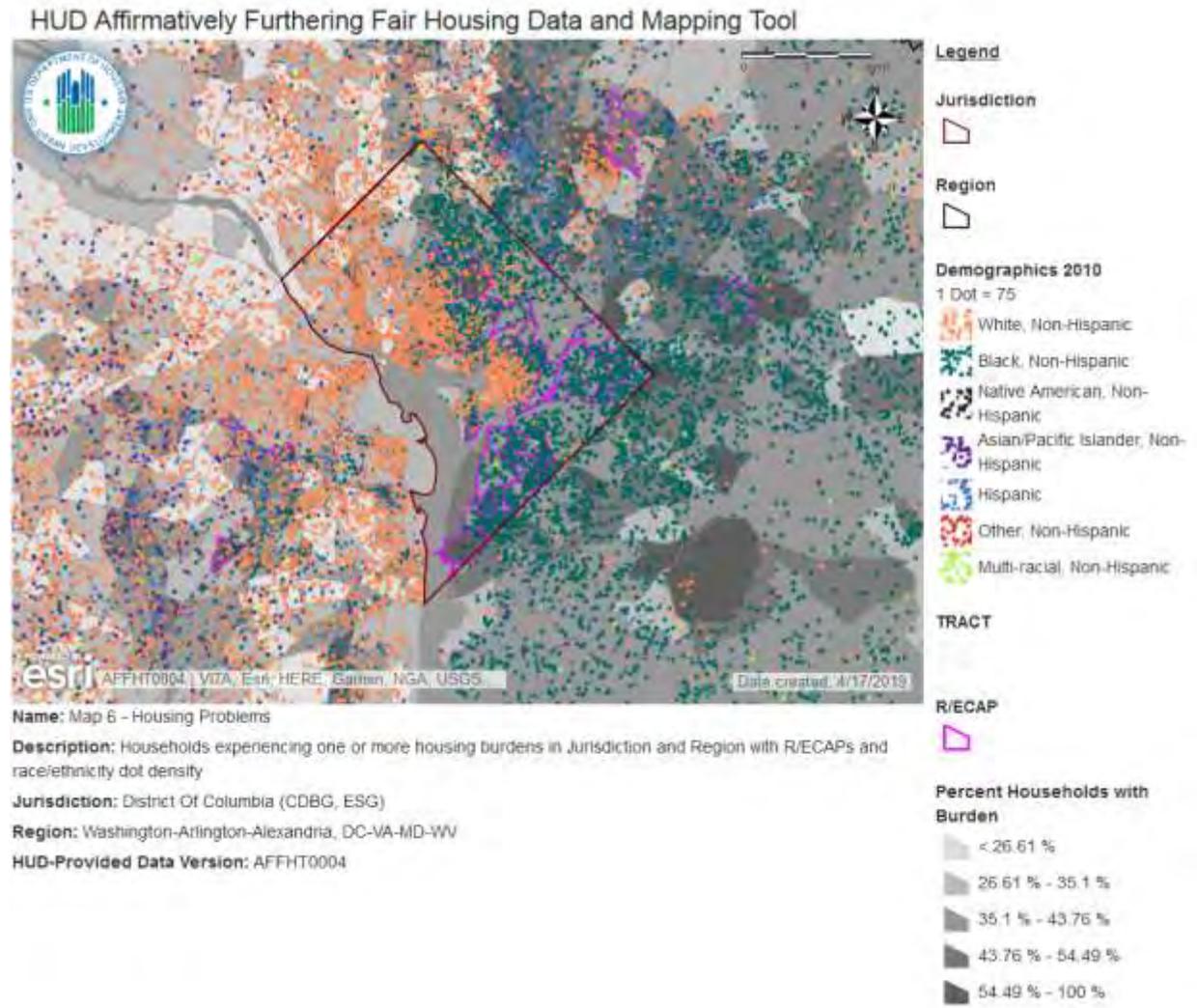
One of the greatest challenges facing the D.C. metro area and contributing to these extreme housing burdens is gentrification. A recent study by the National Community Reinvestment Coalition found that D.C. has experienced the most intense gentrification of any city in the country.<sup>48</sup> The most intense displacement is happening in Ward 6, which includes the areas of Capitol Hill, Navy Yard, the Southwest Waterfront, and parts of downtown. In parts of Capitol Hill and Kingman Park, almost 75% of former low-income residents have been displaced. The Navy Yard neighborhood has seen the percentage of low income residents drop by 50 points in 16 years.

Some tools that the District has employed that can help combat gentrification are rent control and inclusionary zoning; however, community engagement has reflected deep dissatisfaction with the limited scope of inclusionary zoning in the District. Community engagement has also reported illegal tactics to try to force out tenants and circumvent rent control and/or TOPA – the Tenant Opportunity to Purchase Act. Larger studies have also found that as gentrification pressures increase, so do the rate of illegal evictions of particularly low-income residents in favor of remodeling and drastically increasing prices for incoming gentrifiers.

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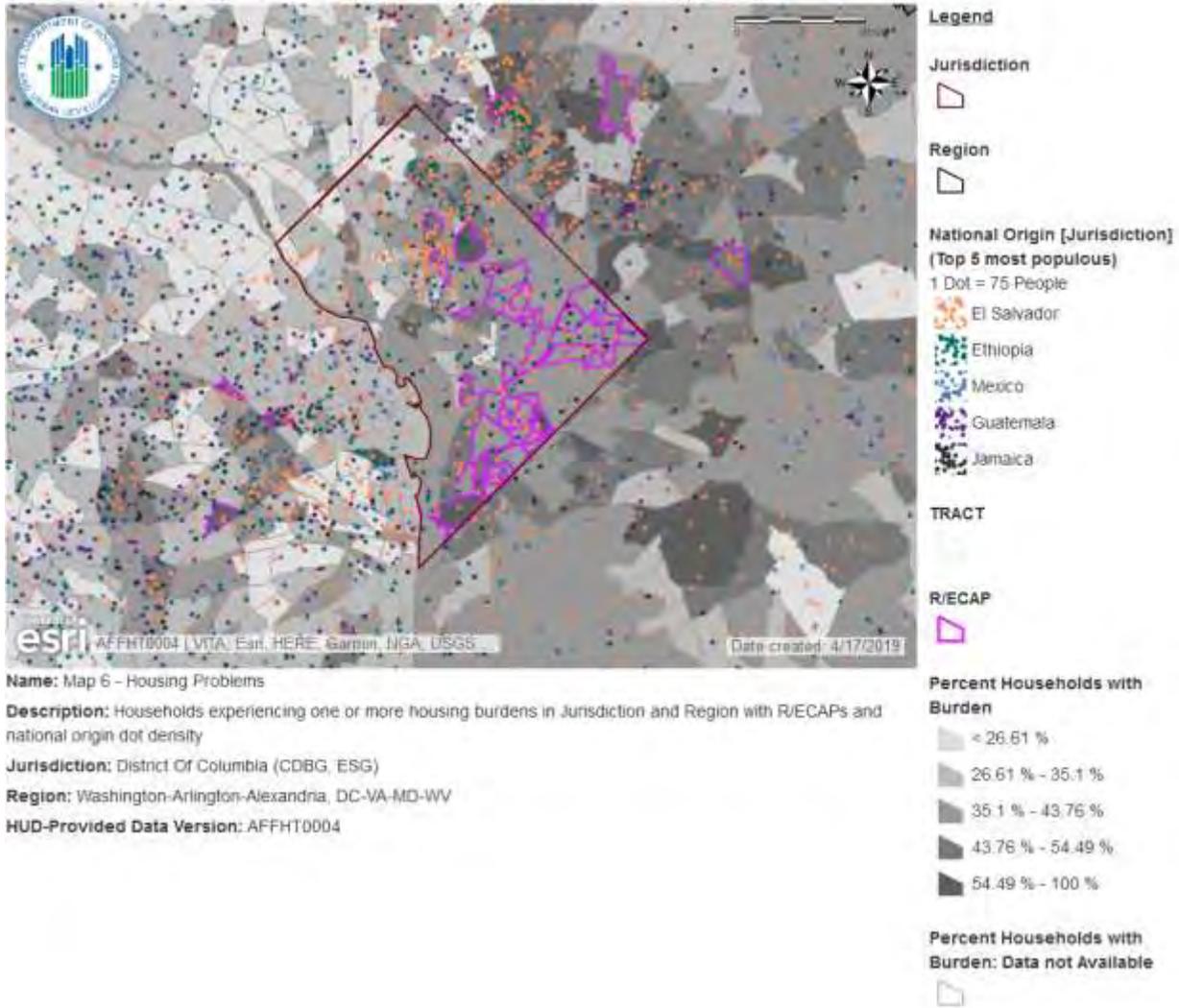
<sup>48</sup> [https://www.washingtonpost.com/local/in-the-district-gentrification-means-widespread-displacement-report-says/2019/04/26/950a0c00-6775-11e9-8985-4cf30147bdca\\_story.html?noredirect=on&utm\\_term=.d837afa8303d](https://www.washingtonpost.com/local/in-the-district-gentrification-means-widespread-displacement-report-says/2019/04/26/950a0c00-6775-11e9-8985-4cf30147bdca_story.html?noredirect=on&utm_term=.d837afa8303d)

# Map 1: Demographics of Households with Disproportionate Housing Needs, Washington, D.C.



**Map 2: Demographics of Households with Disproportionate Housing Needs for Top 5 National Origin Populations, Washington, D.C.**

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



*Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.*

**Table 4: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, Washington, D.C.**

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	2,955	45.16%	1,642	25.10%	1,656	25.31%	2,005	30.64%
Project-Based Section 8	4,658	48.71%	3,576	37.39%	1,207	12.62%	3,716	38.85%
Other Multifamily	451	89.84%	14	2.79%	11	2.19%	7	1.39%
HCV Program	3,983	34.11%	3,690	31.60%	3,840	32.89%	4,496	38.51%

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

Table 4 (above) breaks down publicly supported housing by number of bedrooms, as well as households with children in each category of housing. There are 49,925 households in D.C. experiencing severe housing cost burden, which might be eligible for affordable housing. Of those households, 18,020 (nearly 40%) are families with children. However, there are only 4,783 Project-Based Section 8 units, 3,298 Public Housing units, and 25 Other Multifamily units with more than one bedroom capable of housing these families. By the numbers, Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 7,530 multi-bedroom units accessed. Households with children make up 38.51% of occupants. However, the percentages of households occupying Public Housing and Project-Based Section 8 units are quite similar, even if they trail Housing Choice Vouchers in raw numbers. Households with children make up 30.64% of Public Housing and 38.85% of Project-Based Section 8. In addition to shutting out families with children, the predominance of units with 0-1 bedrooms also pose a problem to residents with disabilities who may require a live-in aide, thereby preventing true integration of people with disabilities into a community-based setting.

In addition to the number of bedrooms available to families and people with disabilities, it is instructive to analyze code enforcement data and habitability problem. Washington, D.C. has very comprehensive code enforcement data and analysis available to the public, which allows inquiry into which wards of the District may be experiencing the greatest levels of habitability problems.<sup>49</sup> The chart below indicates that Wards 7 and 8 have the most unabated housing code violations. The map below depicts the largest amounts of housing code violations through increasingly larger circles – the largest circles are seen in Wards 7 and 8, and moving northward roughly along the same path as the green line of the Metro. These code enforcement patterns

<sup>49</sup> <https://eservices.dcr.dg.gov/DCRAAgencyDashboard/index>

very clearly align with the segregation patterns in the District, displaying yet another dimension of the disproportionate housing needs of protected classes.

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**Figure 1: Housing Code Violations by Ward**

Ward	Inspections with Housing Violati..	Housing Violations Repaired
1	1,207	656
2	630	372
3	685	446
4	1,528	668
5	1,814	758
6	945	368
7	1,953	807
8	2,488	960

Housing inspections are designed to ensure landlords make necessary repairs to make residential units habitable. This map highlights the location and number of inspections where violations were found; it also details the inspections where violations were abated.

The size of each bubble represents the density of inspections where violations were found.

**For the address search:** Please enter the partial address or street number of the building you're trying to find, hit enter, and then select from the list.

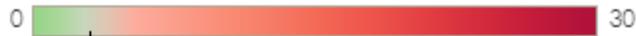
ie: '15 Conn'

**Address Search**

Fiscal Year

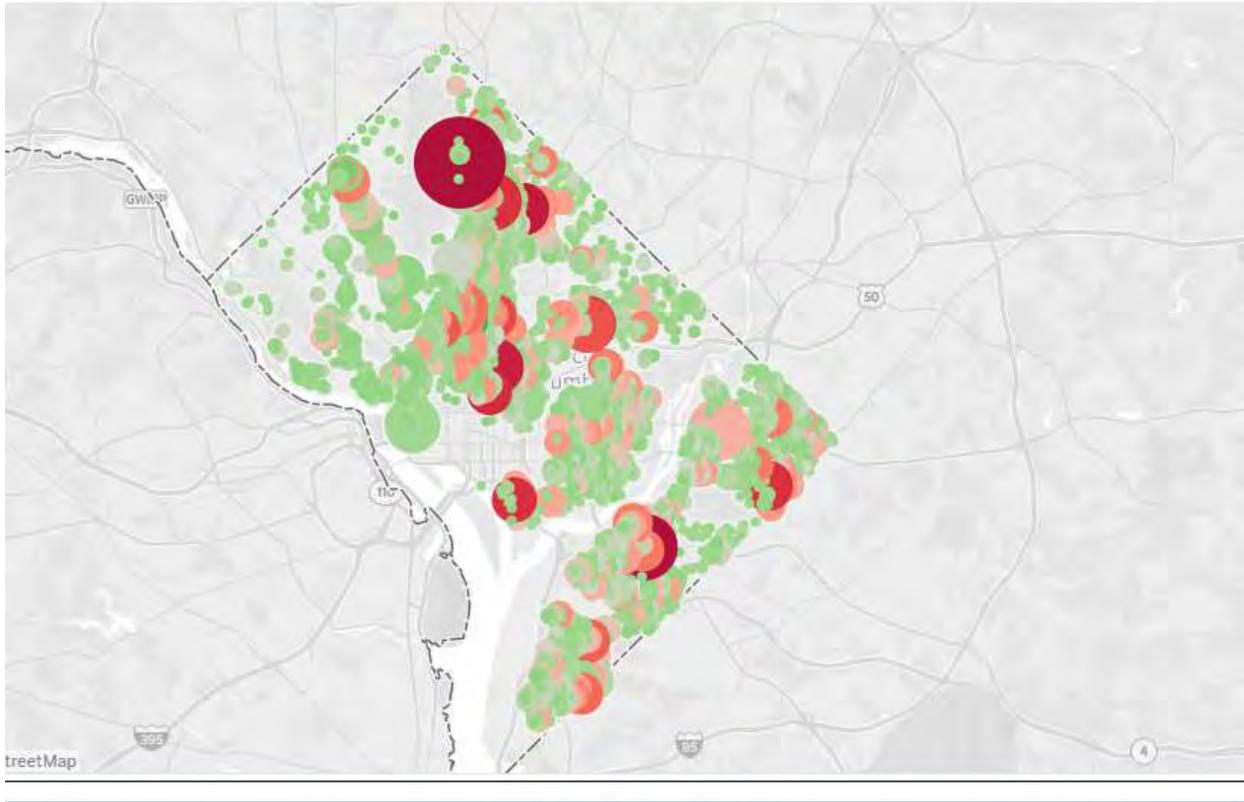
- (All)
- FY2017
- FY2018
- FY2019

Inspections unabated



**Map 3: Housing Code Inspections, Washington, D.C.**

**Housing Code Inspections**



*Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and Region.*

**Table 5: B25003: TENURE - Universe: Occupied housing units  
2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total	277,987		2,170,034	
Owner occupied	115,795	41.65%	1,376,684	63.44%
Renter occupied	162,190	58.34%	793,350	36.56%

**Table 6: B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is White alone, not Hispanic or Latino**  
**2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total	115,088		1,140,064	
Owner occupied	58,071	50.46%	826,417	72.49%
Renter occupied	57,017	49.54%	313,647	27.51%

**Percentage**

**Table 7: B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Black or African American alone**  
**2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total	123,505		558,576	
Owner occupied	44,557	36.08%	281,943	50.48%
Renter occupied	78,948	63.92%	276,633	49.52%

**Table 8: B25003D: TENURE (ASIAN OR PACIFIC ISLANDER ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Asian or Pacific Islander alone**  
**2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total	10,817		190,518	
Owner occupied	4,078	37.70%	130,139	68.31%
Renter occupied	6,739	62.30%	60,379	31.69%

**Table 9: B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Hispanic or Latino**  
**2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total	23,729		235,083	
Owner occupied	7,630	32.15%	112,228	47.77%
Renter occupied	16,099	67.85%	122,855	52.26%

**Table 10: B25003C: TENURE (AMERICAN INDIAN AND ALASKA NATIVE ALONE HOUSEHOLDER) – Universe: Occupied housing units with a householder who is American Indian and Alaska Native alone**  
**2013-2017 American Community Survey 5-Year Estimates**

	Washington, D.C.		Region	
	#	%	#	%
Total				
Owner occupied	267	34.45%	3,730	54.75%
Renter occupied	508	65.55%	3,083	45.25%

A final indicator of disproportionate housing needs is the difference in whether households rent or own homes across different racial and ethnic groups. In both D.C. and the region, White households experience the highest levels of homeownership (50.46% in D.C.). Every other group experiences homeownership in the 30-40% range, with Asian American or Pacific Islanders the next highest at 37.70%. At the regional level, overall ownership levels are higher for each group. The gap between White and Asian American of Pacific Islander households is much smaller, at 72.49% versus 68.31%. The other groups cluster near 50% ownership, roughly 15-20 points behind White and Asian American or Pacific Islander rates. Each group experiences homeownership rates of 47% or higher, outpacing the overall D.C. homeownership rate of 41.65%. This increase in homeownership in the region is unsurprising when one accounts for the greater proportion of single-family homes and higher income levels in suburban counties.

**Additional Information**

*Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.*

**Table 11: B25035: MEDIAN YEAR STRUCTURE BUILT**  
**2013-2017 American Community Survey**

	Washington, D.C.	Region
Median year structure built	1952	1980

In addition to HUD-provided data, information about the age of the housing stock in D.C. may reflect housing condition issues, potentially including lead paint exposure, that are suggestive of disproportionate housing needs. The table above shows that the housing stock in D.C. is more than half a century old. The region’s housing stock is nearly 30 years younger, on average. Within the greater metro area (see map below), it is clear that the farther into the suburbs you go, the newer the housing stock. This means that people who need newer housing, be it for accessibility issues, lead paint issues, or something else, will need to commute further if they

work in D.C. Lead paint was banned nationally in 1978. The typical housing unit in the region was built after the ban while the median unit in D.C. was built long before it.

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#### Map 4: Median Year Structure Built, Region



The District has taken some steps to account for this older housing stock and the potential problems it poses. The District regulates asbestos and lead abatement, but does not directly provide abatement services. The District regulates asbestos abatement by issuing permits, inspecting and monitoring abatement projects, reviewing abatement reports, investigating asbestos complaints, and prosecuting violators who do not comply with asbestos laws and regulations. The District also regulates lead abatement. Through the D.C. Partnership for Healthy Homes, participating health providers can refer families experiencing health problems caused by living conditions like the presence of lead, and receive technical assistance and links to funding sources for those who qualify.<sup>50</sup>

*The program participant may also describe other information relevant to its assessment of disproportionate housing needs.*

#### Homelessness

Although the experience of homelessness is not reflected in HUD-provided data regarding the prevalence of housing problems, the homelessness problem in Washington, D.C. and the broader Region is arguably one of the most pressing housing problems, with 1 of every 100 residents of the District experiencing homelessness. The 2019 Point in Time Count<sup>51</sup> occurred in late January of this year, and the Metropolitan Washington Council of Governments prepared a

<sup>50</sup> <https://doee.dc.gov/service/dc-partnership-healthy-homes>

<sup>51</sup> HUD requires that communities which receive funds from the McKinney-Vento Homeless Assistance Grants program perform a “Point in Time Count,” which consists of a count of sheltered people annually and a count of unsheltered people every other year (although most communities perform the unsheltered count annually as well). This count provides data on people experiencing homelessness in the District, and allows the District to track homelessness over time and break down the data by certain protected categories, which are discussed in more detail below.

comprehensive report on the D.C. Metro Area statistics. In every part of the metro area except Loudoun County and Fairfax County, the total number of homeless people decreased from 2018, and those counties saw only very small increases. The largest homeless populations are located in Washington, D.C. (6,521), Fairfax County (1,034), and Montgomery County (647). Not coincidentally, Fairfax and Montgomery Counties have the largest populations of any counties in the Region. When measuring the change from 2015-2019, only Loudoun County saw a miniscule increase of 1%, while the areas with the largest homeless populations saw large decreases of 11% (Washington, D.C.), 14% (Fairfax County), and 41% (Montgomery County). Overall, homeless individuals do not make up a significant percentage of the population in any of these areas except for Washington, D.C., where nearly 1% of the total population is homeless.

**Table 12: Literally Homeless by Jurisdiction, 2018-2019**

<b>TABLE 1: Literally Homeless By Jurisdiction, 2018 - 2019</b>				
<b>Jurisdiction</b>	<b>2018</b>	<b>2019</b>	<b>Change in Number of Persons 2018-2019</b>	<b>Percent Change 2018 - 2019</b>
City of Alexandria	226	198	-28	-12%
Arlington County	221	215	-6	-3%
District of Columbia	6,904	6,521	-383	-6%
Fairfax County	987	1,034	47	5%
Frederick County	316	286	-30	-9%
Loudoun County	134	169	35	26%
Montgomery County	840	647	-193	-23%
Prince George's County	478	447	-31	-6%
Prince William County	374	277	-97	-26%
<b>TOTAL</b>	<b>10,480</b>	<b>9,794</b>	<b>-686</b>	<b>-7%</b>

Source: COG 2019

**Table 13: Literally Homeless by Jurisdiction, 2015-2019**

TABLE 2: Literally Homeless By Jurisdiction, 2015-2019							
	2015	2016	2017	2018	2019	Change in Number of Persons 2015 - 2019	Percent Change 2015 - 2019
City of Alexandria	267	224	211	226	198	-69	-26%
Arlington County	239	174	232	221	215	-24	-10%
District of Columbia	7,298	8,350	7,473	6,904	6,521	-777	-11%
Fairfax County	1,204	1,059	964	987	1,034	-170	-14%
Frederick County	311	349	309	316	286	-25	-8%
Loudoun County	168	134	113	134	169	1	1%
Montgomery County	1,100	981	894	840	647	-453	-41%
Prince George's County	627	544	532	478	447	-180	-29%
Prince William County	409	400	400	374	277	-132	-32%
<b>TOTAL</b>	<b>11,623</b>	<b>12,215</b>	<b>11,128</b>	<b>10,480</b>	<b>9,794</b>	<b>-1,829</b>	<b>-16%</b>

Source: COG 2019

**Table 14: 2019 Share of Population That Is Experiencing Homelessness by Jurisdiction**

TABLE 3: 2019 Share of Population That Is Experiencing Homelessness				
Jurisdiction	2018 Total Population*	2019 Literally Homeless	Homeless as Percent of Total Population	Homeless Persons per 1,000 People
City of Alexandria	160,530	198	0.12%	1.2
Arlington County	237,521	215	0.09%	0.9
District of Columbia	702,455	6,521	0.93%	9.3
Fairfax County <sup>1</sup>	1,190,141	1,034	0.09%	0.9
Frederick County	255,648	286	0.11%	1.1
Loudoun County	406,850	169	0.04%	0.4
Montgomery County	1,052,567	647	0.06%	0.6
Prince George's County	909,308	447	0.05%	0.5
Prince William County <sup>2</sup>	526,959	277	0.05%	0.5
<b>Region with D.C.</b>	<b>5,441,979</b>	<b>9,794</b>	<b>0.18%</b>	<b>1.8</b>
<b>Region without D.C.</b>	<b>4,739,524</b>	<b>3,273</b>	<b>0.07%</b>	<b>0.7</b>

\*Source: Table 1. Annual Estimates of the Resident Population for the Metropolitan Washington Council of Governments: April 1, 2010 to July 1, 2017. U.S. Census Bureau, Population Division, April 2019.

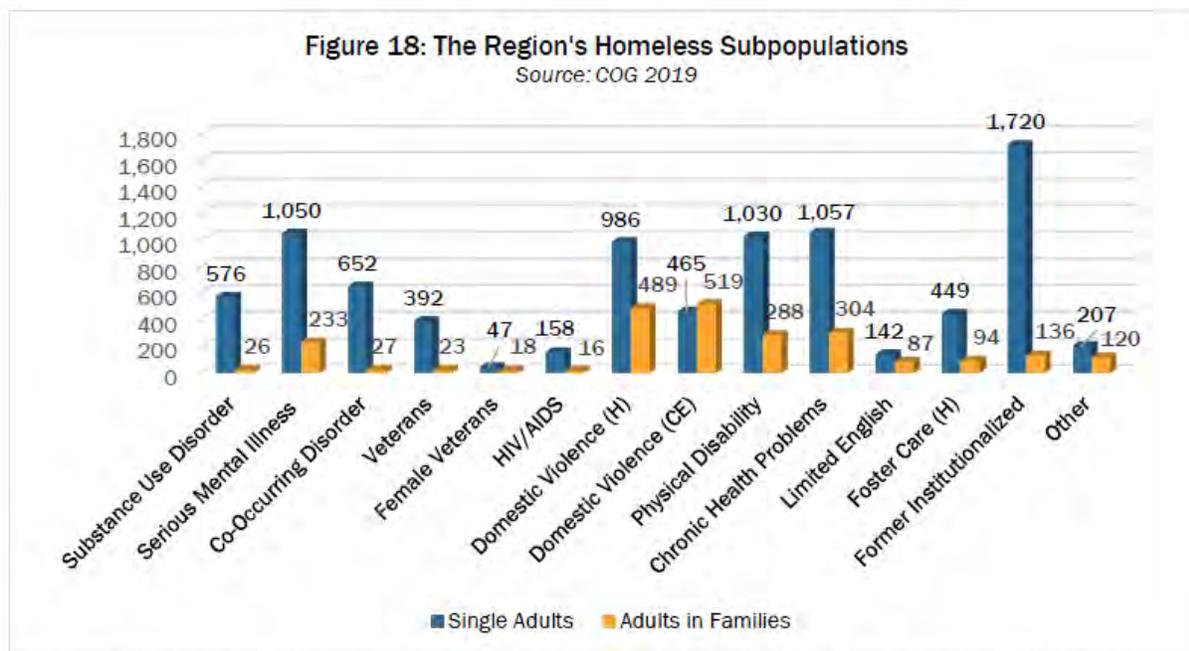
<sup>1</sup> Includes the Cities of Fairfax and Falls Church

<sup>2</sup> Includes the Cities of Manassas and Manassas Park

Homelessness, like other issues of displacement and housing burdens, particularly harms protected classes. Among single adults, a startling 74% of homeless individuals in the region are Black, while 20% are White, and every other racial or ethnic group makes up 5% or less of the remainder. Additionally, 7% of people identified as Latino. The rates for homeless Latino

families are similar to individuals, but Black homeless families comprise a much higher share of homeless families than Black individuals (88%) do of homeless individuals (74%).

**Figure 2: Homeless Subpopulations, Region**



Note: These subgroups are not mutually exclusive. It is possible for homeless adults to be counted in more than one category.

The data are also disaggregated by various protected classes and other homelessness characteristics (see Figure 2 above), with the highest numbers in the categories of serious mental illness, domestic violence victims, physical disability, chronic health problems, and formerly institutionalized. These observations can aid in predicting high risk groups and implementing programs to try to prevent homelessness in those groups. Comparatively, veterans, people with HIV/AIDS, and limited English proficient speakers make up notably smaller percentages of the population.

While overall numbers of homeless individuals have fallen, housing prices in the D.C. Metro continue to skyrocket and wages are not keeping pace. Recent research by Zillow found that for every 5% increase in rent in the metro area, another 1,000 people are estimated to experience homelessness.<sup>52</sup> Continued and increased investment in homelessness services and affordable housing are necessary in order to curb this completely predictable phenomenon. Recent rehousing programs have also hit some very public stumbling blocks, including a lack of services for recently homeless people.<sup>53</sup>

<sup>52</sup> <https://www.zillow.com/research/rents-larger-homeless-population-16124/>

<sup>53</sup> [https://www.washingtonpost.com/local/dc-politics/dc-housed-the-homeless-in-upscale-apartments-it-hasnt-gone-as-planned/2019/04/16/60c8ab9c-5648-11e9-8ef3-fbd41a2ce4d5\\_story.html?fbclid=IwAR3d5ReN2uZS8OX9MzjKZQkf13xNMibGr4HX3XZwPUCmtWxdrvUIOvzhZg&utm\\_term=.d3c8589f225d](https://www.washingtonpost.com/local/dc-politics/dc-housed-the-homeless-in-upscale-apartments-it-hasnt-gone-as-planned/2019/04/16/60c8ab9c-5648-11e9-8ef3-fbd41a2ce4d5_story.html?fbclid=IwAR3d5ReN2uZS8OX9MzjKZQkf13xNMibGr4HX3XZwPUCmtWxdrvUIOvzhZg&utm_term=.d3c8589f225d)

## Contributing Factors of General Fair Housing Issues

### Availability of affordable units in a range of sizes

The availability of affordable units in a range of sizes is a highly significant contributing factor to disproportionate housing needs, such as disparities in cost burden and overcrowding, as well as to segregation. As D.C. becomes increasingly unaffordable and neighborhoods struggle to address the effects of gentrification, affordable housing for families is increasingly a priority in the struggle to allow low-income residents to continue to live in D.C.

In recent years, the District has allowed an increased number of luxury apartments to be built, but there is still a significant need for affordable housing units. Luxury units have tended to be small units that cannot accommodate large families with children, making the need for affordable units with three or more bedrooms particularly acute. Although the District has built over 6,000 affordable housing units in recent years, the National Low Income Housing Coalition reports that the D.C.-Maryland-Virginia region needs 350,000 housing units to address the affordable housing scarcity.<sup>54</sup> While the District has many resources available to assist residents searching for low-income housing, including funding to D.C.'s Housing Production Trust Fund and online services like DCHousingSearch.org, further attention is needed to the lack of affordable housing units themselves in the District.<sup>55</sup> The District continues to invest \$100 million yearly in affordable housing (and \$130 million has been proposed for 2020), maxing out the number of units that they can build with that amount of money. Even still, fewer units are able to be produced yearly due to rising construction costs, and a recent report from the Office of the District of Columbia Auditor found that five out of nine proposals that were selected in June of 2018 were ranked by staff evaluators in the bottom 50% of applications, resulting in 353 fewer affordable housing units.<sup>56</sup>

A few factors contribute to the lack of affordable housing within D.C. The first is that building low-income housing is seen as riskier and less profitable than building workforce or luxury housing. A lack of private drive to build low-income housing, accompanied by an increase in the construction of luxury housing, means that the supply of affordable housing relative to all housing in D.C. is decreasing.

The reality is that the current supply of affordable housing is not meeting the needs of low income residents. HUD's definition of "affordable" housing does not reflect realities of low-income residents in D.C., and a lack of consolidated data on the subject compounds this problem. HUD's definition of affordable housing is housing that costs no more than 30% of household income, but this is in a region in which the median family income is \$107,500. Area Median Income for D.C. is calculated regionally, rather than by individual neighborhoods, meaning that the inclusion of wealthier neighborhoods in the Region stretches the definition for "affordable" for very low-income residents of D.C. Community feedback has included criticism of this policy, as many units that are technically "low-income" housing are still out of reach for lower-income

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<sup>54</sup> <https://wamu.org/story/18/10/24/isnt-affordable-housing-d-c-area/>

<sup>55</sup> <https://wamu.org/story/19/03/11/d-c-must-double-its-investment-in-affordable-housing-report-says/>

<sup>56</sup> <http://dcauditor.org/report/low-ranked-projects-secure-affordable-housing-funds-2/>

residents. Though various entities have tried to collect data on all the affordable housing in D.C., including the District itself, a comprehensive database of affordable housing still does not exist within D.C., making it difficult to gain a full picture of the problem.<sup>57</sup>

Furthermore, parts of D.C. simply are not zoned to allow for more affordable housing. Though ideally, affordable housing would be more uniformly distributed throughout D.C., zoning measures make this more difficult. Apartment buildings are typically ideal for affordable housing units, but some neighborhoods are resistant to zoning that would allow for these properties, as they would supposedly alter the character of those neighborhoods.

#### Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking are significant contributing factors to disproportionate housing needs for women in D.C. and the Region. The District has certain legal protections for victims of domestic violence seeking housing support. The District passed the D.C. Protection from Discriminatory Evictions for Victims of Domestic Violence Amendment Act in 2006, which includes protections for victims such as early lease termination, protection for calling the police, lock changes and other protection from evictions. Victims are entitled to protection from eviction so long as they have received protective orders or have a copy of a police report filed in the previous 60 days. Victims can break their leases early so long as they have a signed letter from a qualified third party documenting the abuse. Landlords cannot keep security deposits, but the tenant still must pay damages for the apartment, even if caused by the domestic violence. If a victim requests a lock change, the landlord has 5 business days to change locks and can ask the tenant for reimbursement.<sup>58</sup>

The D.C. Coalition Against Domestic Violence includes fourteen organizations in D.C. providing services to victims of domestic violence in D.C. These include temporary housing, legal support, emotional support, advocacy efforts and other resources helpful to victims.<sup>59</sup> In 2018, the Coalition conducted a survey of District agencies tracking their response to staff and community members experiencing domestic violence. This information revealed that 21 of 23 agencies did not have an adequate response to victims, due to a lack of a specific domestic violence policy. As a result of this survey, the District is increasing its attention to domestic violence issues.<sup>60</sup>

In the greater region, the situation is more dire, as Maryland and Virginia have fewer legal protections for domestic violence survivors. In these states, counties provide domestic violence services. Montgomery County provides 24 hour crisis services, victim advocates, and emergency filing services to respond to incidents of domestic violence. Arlington County's new budget includes expanding domestic violence services for victims, and current services include safety

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<sup>57</sup> <https://dc.curbed.com/2018/8/17/17724276/dc-affordable-housing-data-affordability-comprehensive-database>

<sup>58</sup> <https://www.dashdc.org/housing-resource-center/know-rights/>

<sup>59</sup> <https://dccadv.org>

<sup>60</sup> <https://www.streetsensemedia.org/article/domestic-violence-policies-dccadv-dc/#.XPUx6o8pAdU>

planning for persons leaving abuse situations, outreach and education to prevent abuse, and crisis intervention services.

### Deteriorated and abandoned properties

Deteriorated and abandoned properties contribute to fair housing issues in D.C., including disproportionate housing needs, segregation, R/ECAPs, and disparities in access to opportunity. As with other issues around neighborhood resources and maintenance, property deterioration discourages households with a broader range of incomes from living in neighborhoods that suffer from these problems. Eleven percent of D.C.'s total housing stock is vacant.<sup>61</sup> Deterioration and abandonment are not unique to residential properties—public use properties have been left to linger too. For example, vacant school buildings in rapidly gentrifying neighborhoods have sparked debates among city officials, community members, and developers regarding whose interests are prioritized in rehabilitating neighborhood properties.<sup>62</sup> Vacancy is more common in predominantly Black neighborhoods in Wards 7 and 8 than it is citywide.

The District runs a variety of programming to combat vacancy and abandonment. The D.C. Department of Housing and Community Development (DHCD) runs a Property Acquisition and Disposition Division (PADD) to promote neighborhood stability by using vacant and/or abandoned properties for mixed-income homeownership.<sup>63</sup> Through PADD, the District runs a “Vacant to Vibrant DC Initiative” that auctions vacant sites to developers.<sup>64</sup> Moreover, the District provides rent control for qualifying properties that sets standards for any increases to curb displacing low-income tenants.<sup>65</sup>

Further, the Department of Consumer and Regulatory Affairs (DCRA) taxes vacant and blighted properties at a higher rate than occupied properties to incentivize owner maintenance.<sup>66</sup> This tool is the District's main enforcement mechanism against neglectful landlords<sup>67</sup>, but it has fallen short of its intended goals—a report from the D.C. Auditor in 2017 showed the District routinely failed to take action against property owners who allowed their properties to dilapidate.<sup>68</sup> The D.C. Auditor found the program was mismanaged, and property owners who allowed their properties to languish were given undue exemptions from the higher taxes, subverting their

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<sup>61</sup> U.S. Census Bureau (2017). American Community Survey 1-year estimates. Retrieved from Census Reporter Profile page for Washington, DC, <http://censusreporter.org/profiles/16000US1150000-washington-dc/>

<sup>62</sup> [https://www.washingtonpost.com/local/education/dc-council-rejects-mayors-proposal-to-move-banneker-high/2019/05/14/6065ac2e-7671-11e9-b7ae-390de4259661\\_story.html?utm\\_term=.ec1d9b0de8a6](https://www.washingtonpost.com/local/education/dc-council-rejects-mayors-proposal-to-move-banneker-high/2019/05/14/6065ac2e-7671-11e9-b7ae-390de4259661_story.html?utm_term=.ec1d9b0de8a6);  
<https://ggwash.org/view/68728/at-this-abandoned-school-can-yimbys-support-fewer-homes-and-more-parkland>

<sup>63</sup> <https://dhcd.dc.gov/service/transforming-vacant-and-blighted-properties>

<sup>64</sup> <https://dhcd.dc.gov/page/vacant-vibrant-dc>

<sup>65</sup> [https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service\\_content/attachments/Rent%20Control%20Fact%20Sheet%202018.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service_content/attachments/Rent%20Control%20Fact%20Sheet%202018.pdf)

<sup>66</sup> <https://www.washingtoncitypaper.com/news/housing-complex/blog/20839403/dc-tightens-regulations-on-vacant-properties>

<sup>67</sup> [https://wamu.org/story/15/10/09/why\\_does\\_dc\\_have\\_so\\_many\\_vacant\\_houses\\_when\\_real\\_estate\\_is\\_so\\_pricey/](https://wamu.org/story/15/10/09/why_does_dc_have_so_many_vacant_houses_when_real_estate_is_so_pricey/)

<sup>68</sup> <https://wamu.org/story/17/09/21/d-c-failed-enforce-law-vacant-blighted-homes-says-audit/>

preventative purpose.<sup>69</sup> For example, landlords can apply for a construction permit on the property, renew it repeatedly without oversight, and avoid the tax altogether.<sup>70</sup>

And, reports and feedback from community meetings<sup>71</sup> have alleged some landlords may be (1) intentionally allowing their properties to dilapidate or sit vacant and/or (2) violating tenant protections when selling their properties. For example, a lawsuit brought by the D.C. Attorney General’s Office against Sanford Capitol, a management company, alleged the company was allowing the property to deteriorate into “slum-like conditions” to “constructively evict as many tenants as possible” so they could redevelop the property.<sup>72</sup> Fear of retaliation by landlords may compound the impact of this approach—community meeting participants noted undocumented tenants were scared to request repairs and landlords<sup>73</sup> Tenants also alleged the company sold properties to other companies in violation of their right of first refusal to purchase their homes. Efforts such as these exploit a loophole in the District’s affordable housing laws, which allows property owners to raise the rental price up to 30 percent on a rent-controlled unit when it becomes vacant.<sup>74</sup> And tenants may be left in a lurch if DCRA fails to enforce the housing code against these property owners.<sup>75</sup>

While deteriorated and abandoned properties do not appear to be contributing factors in the greater Region, recent changes to Maryland law has piqued the interest of D.C.’s surrounding counties, like Prince George’s County. Legislation passed in 2017 allows localities to create “land banks” to convert vacant or abandoned land for public purposes, with Prince George’s County expressing interest in this practice.<sup>76</sup>

### Community opposition

Community opposition is a major contributing factor to the perpetuation of segregation and R/ECAPs in D.C. and the region. Legal challenges, petitions, historic preservation designation filings, and other forms of advocacy can delay or cancel housing projects, contributing to an unequitable distribution of housing, particularly affordable housing, in the city and reinforcing existing patterns of economic and racial segregation. Community opposition, often referred to as NIMBYism (Not In My Backyard), can take the form of legal challenges<sup>77</sup>, zoning advocacy,

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<sup>69</sup> <http://dcauditor.org/wp-content/uploads/2018/07/Vacant.Blighted.Report.9.21.17.pdf>

<sup>70</sup> [https://wamu.org/story/15/10/09/why\\_does\\_dc\\_have\\_so\\_many\\_vacant\\_houses\\_when\\_real\\_estate\\_is\\_so\\_pricey/](https://wamu.org/story/15/10/09/why_does_dc_have_so_many_vacant_houses_when_real_estate_is_so_pricey/)

<sup>71</sup> Petworth.

<sup>72</sup> <https://thedcline.org/2019/05/15/court-considers-an-injunction-to-halt-repairs-as-legal-battle-continues-over-former-sanford-capital-properties-in-congress-heights/>

<sup>73</sup> Stakeholder Meeting 5-7.

<sup>74</sup> <https://www.washingtoncitypaper.com/news/article/13046333/losing-control-dcs-rent-control-laws-are-supposed-to-keep>

<sup>75</sup> <https://ggwash.org/view/71558/a-columbia-heights-rent-strike-highlights-abuses-tenants-face-in-dc>

<sup>76</sup> <https://pgs.thesentinel.com/2017/10/04/md-law-allows-county-to-consider-land-banks-for-blight-mitigation/>

<sup>77</sup> <https://www.bizjournals.com/washington/news/2019/03/14/memillan-redevelopment-team-requests-extension.html>

historic preservation applications<sup>78</sup>, protests, lobbying, and ANC disapproval of projects<sup>79</sup>. New housing development, affordable housing, publicly supported housing (including the use of HCVs), multifamily housing, or housing for persons with disabilities may all be targets of community opposition. There are many examples of community opposition to projects across D.C., particularly in more affluent areas that may have more resources to oppose development. For instance, a proposed mixed-use development off of Massachusetts Avenue NW in the American University Park neighborhood has faced opposition for more than 3 years.<sup>80</sup> A 2016 lawsuit also delayed the construction of a homeless shelter in McLean Gardens which would help form a citywide network of shelters to replace the shelter at D.C. General Hospital.<sup>81</sup>

Opponents of new development often cite concerns about how the density of projects will affect neighborhood character<sup>82</sup> and open space<sup>83</sup>. In addition, opponents often cite the impact of development on traffic and parking<sup>84</sup>. Opponents may also object to projects by claiming that there are not enough affordable units in a proposal.<sup>85</sup> Stakeholders report that community opposition has led developers to scale back projects in order to avoid contentious development fights that add costs and delay. Developers may also choose to concentrate their efforts to build in areas where community opposition is less prevalent.

Community input plays a vital role in shaping development and may raise legitimate concerns about approval processes or the potential costs of development. For example, lower-income communities may be worried that new development will spur gentrification and displacement but will not produce benefits for existing residents. These concerns should be addressed. However, community opposition may also be based on stereotypes and biases about potential new residents. Overall, community opposition to proposed housing projects can have harmful effects on fair housing. When community opposition is successful at scaling back the size of housing projects or preventing new housing from being built, it can limit access to certain neighborhoods, especially high-opportunity areas. This has a negative effect on housing choice for members of protected classes.

Community opposition to housing development is a pervasive issue and has affected housing production in much of the region.<sup>86</sup> In Reston, a proposal to increase housing density has been

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<sup>78</sup> <https://intowner.com/2019/04/14/masonic-temple-development-opponents-pin-final-hope-on-empty-land-argument-before-the-hprb/>

<sup>79</sup> Lilah Burke, After Meridian International wins zoning exceptions, residents look to rezone lot <https://thedcline.org/2018/09/27/after-meridian-international-wins-zoning-exceptions-residents-look-to-rezone-lot/>

<sup>80</sup> <https://dc.urbanturf.com/articles/blog/while-zoning-commission-reconsiders-design-review-process-valor-files-pud-f/15379>

<sup>81</sup> <https://thedcline.org/2019/01/11/ward-3-residents-district-government-end-homeless-shelter-dispute-with-new-settlement/>

<sup>82</sup> [https://www.washingtonpost.com/local/dc-politics/a-room-without-a-view-proposed-dc-apartment-complex-offers-life-underground/2018/11/26/7ff816a2-ec52-11e8-96d4-0d23f2aad09\\_story.html?utm\\_term=.84817c4711e2](https://www.washingtonpost.com/local/dc-politics/a-room-without-a-view-proposed-dc-apartment-complex-offers-life-underground/2018/11/26/7ff816a2-ec52-11e8-96d4-0d23f2aad09_story.html?utm_term=.84817c4711e2)

<sup>83</sup> <https://www.bisnow.com/washington-dc/news/mixed-use/group-seeks-to-downzone-property-to-block-development-near-meridian-hill-park-91829> ;

<sup>84</sup> [https://dc.urbanturf.com/articles/blog/impasse\\_on\\_superfresh\\_redevelopment/11594](https://dc.urbanturf.com/articles/blog/impasse_on_superfresh_redevelopment/11594) ; <https://currentnewspapers.com/by-adding-balduccis-to-ladybird-project-developers-draw-further-criticism/>

<sup>85</sup> Keep Meridian Hill Green, <http://keepmeridianhillgreen.org/>

<sup>86</sup> [https://nvaha.org/wp-content/uploads/2019/02/NVAH001\\_1901\\_SupplyPapers-MAIN-FinalWeb.pdf](https://nvaha.org/wp-content/uploads/2019/02/NVAH001_1901_SupplyPapers-MAIN-FinalWeb.pdf)

postponed partly due to strong community opposition.<sup>87</sup> In Arlington, residents in the northern part of the county recently opposed an affordable housing project, citing concerns about the scale of the project as well as traffic.<sup>88</sup> A proposal to redevelop a shopping center in Bethesda into a town center with 500 housing units was approved but was scaled-down from its original plan and faced strong opposition from neighbors concerned about traffic, green space, and preservation of suburban character.<sup>89</sup> Community opposition can hinder regional efforts to increase housing supply and can limit what type of housing residents are able to access across the region.

### Deteriorated and abandoned properties

Deteriorated and abandoned properties contribute to fair housing issues in D.C. Eleven percent of D.C.'s total housing stock is vacant.<sup>90</sup> Deterioration and abandonment are not unique to residential properties—public use properties have been left to linger too. For example, vacant school buildings in rapidly gentrifying neighborhoods have sparked debates among city officials, community members, and developers regarding whose interests are prioritized in rehabilitating neighborhood properties.<sup>91</sup> Vacancy is more common in predominantly Black neighborhoods in Wards 7 and 8 than it is citywide.

The District runs a variety of programming to combat vacancy and abandonment. D.C.'s Department of Housing and Community Development (DHCD) runs a Property Acquisition and Disposition Division (PADD) to promote neighborhood stability by using vacant and/or abandoned properties for mixed-income homeownership.<sup>92</sup> Through PADD, D.C. runs a “Vacant to Vibrant DC Initiative” that auctions vacant sites to developers.<sup>93</sup> Moreover, D.C. provides rent control for qualifying properties that sets standards for any increases to curb displacing low-income tenants.<sup>94</sup>

Further, the Department of Consumer and Regulatory Affairs (DCRA) taxes vacant and blighted properties at a higher rate than occupied properties to incentivize owner maintenance.<sup>95</sup> This tool is the District's main enforcement mechanism against neglectful landlords<sup>96</sup>, but it has fallen short of its intended goals—a report from the D.C. Auditor in 2017 showed the District routinely

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<sup>87</sup> [http://www.fairfaxtimes.com/articles/reston-density-zoning-proposal-indefinitely-deferred/article\\_9151e526-41df-11e9-8acb-0b6319233ec9.html](http://www.fairfaxtimes.com/articles/reston-density-zoning-proposal-indefinitely-deferred/article_9151e526-41df-11e9-8acb-0b6319233ec9.html)

<sup>88</sup> [https://www.insidenova.com/news/arlington/despite-opposition-arlington-red-cross-site-wins-ok-for-redevelopment/article\\_07994e84-4729-11e8-97ec-1f4610a3aad4.html](https://www.insidenova.com/news/arlington/despite-opposition-arlington-red-cross-site-wins-ok-for-redevelopment/article_07994e84-4729-11e8-97ec-1f4610a3aad4.html)

<sup>89</sup> <https://bethesdamagazine.com/bethesda-beat/development/westwood-shopping-center-plans-approved/>

<sup>90</sup> U.S. Census Bureau (2017). *American Community Survey 1-year estimates*. Retrieved from *Census Reporter Profile page for Washington, DC*, <http://censusreporter.org/profiles/16000US1150000-washington-dc/>

<sup>91</sup> [https://www.washingtonpost.com/local/education/dc-council-rejects-mayors-proposal-to-move-banneker-high/2019/05/14/6065ac2e-7671-11e9-b7ae-390de4259661\\_story.html?utm\\_term=.ec1d9b0de8a6;https://ggwash.org/view/68728/at-this-abandoned-school-can-yimbys-support-fewer-homes-and-more-parkland](https://www.washingtonpost.com/local/education/dc-council-rejects-mayors-proposal-to-move-banneker-high/2019/05/14/6065ac2e-7671-11e9-b7ae-390de4259661_story.html?utm_term=.ec1d9b0de8a6;https://ggwash.org/view/68728/at-this-abandoned-school-can-yimbys-support-fewer-homes-and-more-parkland)

<sup>92</sup> <https://dhcd.dc.gov/service/transforming-vacant-and-blighted-properties>

<sup>93</sup> <https://dhcd.dc.gov/page/vacant-vibrant-dc>

<sup>94</sup> [https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service\\_content/attachments/Rent%20Control%20Fact%20Sheet%202018.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service_content/attachments/Rent%20Control%20Fact%20Sheet%202018.pdf)

<sup>95</sup> <https://www.washingtoncitypaper.com/news/housing-complex/blog/20839403/dc-tightens-regulations-on-vacant-properties>

<sup>96</sup> [https://wamu.org/story/15/10/09/why\\_does\\_dc\\_have\\_so\\_many\\_vacant\\_houses\\_when\\_real\\_estate\\_is\\_so\\_pricey/](https://wamu.org/story/15/10/09/why_does_dc_have_so_many_vacant_houses_when_real_estate_is_so_pricey/)

failed to take action against property owners who allowed their properties to dilapidate.<sup>97</sup> The D.C. Auditor found the program was mismanaged, and property owners who allowed their properties to languish were given undue exemptions from the higher taxes, subverting their preventative purpose.<sup>98</sup> For example, landlords can apply for a construction permit on the property, renew it repeatedly without oversight, and avoid the tax altogether.<sup>99</sup>

And, reports and feedback from community meetings<sup>100</sup> have alleged some landlords may be (1) intentionally allowing their properties to dilapidate or sit vacant and/or (2) violating tenant protections when selling their properties. For example, a lawsuit brought by the D.C. Attorney General’s Office against Sanford Capital, a management company, alleged the company was allowing the property to deteriorate into “slum-like conditions” to “constructively evict as many tenants as possible” so they could redevelop the property.<sup>101</sup> Fear of retaliation by landlords may compound the impact of this approach—community meeting participants noted undocumented tenants were scared to request repairs and landlords<sup>102</sup> Tenants also alleged the company sold properties to other companies in violation of their right of first refusal to purchase their homes. Efforts such as these exploit a loophole in D.C.’s affordable housing laws, which allows property owners to raise the rental price up to 30 percent on a rent-controlled unit when it becomes vacant.<sup>103</sup> And tenants may be left in a lurch if DCRA fails to enforce the housing code against these property owners.<sup>104</sup>

While deteriorated and abandoned properties do not appear to be contributing factors in the greater Region, recent changes to Maryland law has piqued the interest of D.C.’s surrounding counties, like Prince George’s County. Legislation passed in 2017 allows localities to create “land banks” to convert vacant or abandoned land for public purposes, with Prince George’s County expressing interest in this practice.<sup>105</sup>

#### Displacement of residents due to economic pressures

The displacement of low-income residents due to economic pressures is a contributing factor to patterns of segregation, disparities in access to opportunity, and other fair housing issues in D.C. and the region. Rapidly rising housing prices in many neighborhoods have placed significant pressure on some longtime residents, particularly low-income residents of color. Faced with increasingly unaffordable housing costs, many of these residents have relocated to find cheaper housing in other neighborhoods within D.C. or have chosen to move to the Virginia and Maryland suburbs. As discussed above, while some areas of D.C. are (at least temporarily)

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<sup>97</sup> <https://wamu.org/story/17/09/21/d-c-failed-enforce-law-vacant-blighted-homes-says-audit/>

<sup>98</sup> <http://dcauditor.org/wp-content/uploads/2018/07/Vacant.Blighted.Report.9.21.17.pdf>

<sup>99</sup> [https://wamu.org/story/15/10/09/why\\_does\\_dc\\_have\\_so\\_many\\_vacant\\_houses\\_when\\_real\\_estate\\_is\\_so\\_pricey/](https://wamu.org/story/15/10/09/why_does_dc_have_so_many_vacant_houses_when_real_estate_is_so_pricey/)

<sup>100</sup> Petworth.

<sup>101</sup> <https://thedcline.org/2019/05/15/court-considers-an-injunction-to-halt-repairs-as-legal-battle-continues-over-former-sanford-capital-properties-in-congress-heights/>

<sup>102</sup> Stakeholder Meeting 5-7.

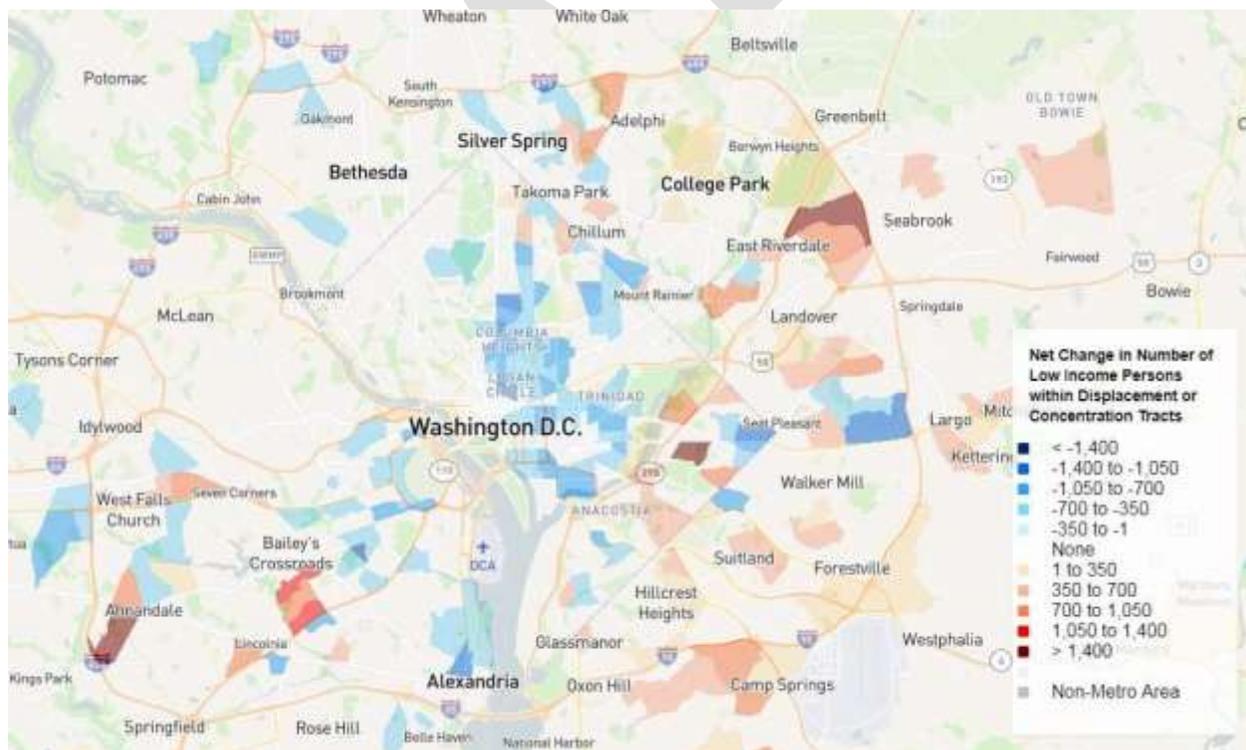
<sup>103</sup> <https://www.washingtoncitypaper.com/news/article/13046333/losing-control-dcs-rent-control-laws-are-supposed-to-keep>

<sup>104</sup> <https://ggwash.org/view/71558/a-columbia-heights-rent-strike-highlights-abuses-tenants-face-in-dc>

<sup>105</sup> <https://pgs.thesentinel.com/2017/10/04/md-law-allows-county-to-consider-land-banks-for-blight-mitigation/>

integrating due to gentrification, displacement has caused the reinforcement of segregation in other areas.

A recent report by the Institute on Metropolitan Opportunity found that from 2000-2016, D.C. experienced the most widespread displacement of low-income residents of any major city in the United States.<sup>106</sup> The report found that 36% of the city's residents is living in neighborhoods where strong gentrification and displacement is underway.<sup>107</sup> In these areas, the Black population has declined by 23% and the population of poor residents has fallen by 28% even while the overall population in these neighborhoods has increased by 19% and the White population has increased by 202%.<sup>108</sup> Additionally, the report noted that some displacement is occurring in portions of Wards 7 and 8.<sup>109</sup> Many residents who are displaced from their homes may be moving out of D.C. altogether. The report found that many suburban areas, concentrated in Prince George's County, have experienced growth in their low-income population and a decline in the White population.<sup>110</sup> As lower and middle-income families leave D.C., the number of wealthier families in the city are increasing.<sup>111</sup>



<sup>106</sup> [https://www.law.umn.edu/sites/law.umn.edu/files/metro-files/american\\_neighborhood\\_change\\_in\\_the\\_21st\\_century\\_-\\_full\\_report\\_-\\_4-1-2019.pdf](https://www.law.umn.edu/sites/law.umn.edu/files/metro-files/american_neighborhood_change_in_the_21st_century_-_full_report_-_4-1-2019.pdf)

<sup>107</sup> *Id.*

<sup>108</sup> [https://www.law.umn.edu/sites/law.umn.edu/files/metro-files/washingtondc\\_incomechange\\_report.pdf](https://www.law.umn.edu/sites/law.umn.edu/files/metro-files/washingtondc_incomechange_report.pdf)

<sup>109</sup> *Id.*

<sup>110</sup> *Id.*

<sup>111</sup> [https://www.dcpolicycenter.org/wp-content/uploads/2018/10/2018StateoftheBusiness\\_for-print\\_0925v05-005.pdf](https://www.dcpolicycenter.org/wp-content/uploads/2018/10/2018StateoftheBusiness_for-print_0925v05-005.pdf)

Another report by the National Community Reinvestment Coalition concluded that D.C. experienced the highest intensity of gentrification of any U.S. city between 2000 and 2013, with 62 low-income census tracts gentrifying.<sup>112</sup> Much of the gentrification has been concentrated around the downtown core. More than 20,000 Black residents have been displaced since 2000 and 33 census tracts have experienced high levels of Black displacement. The Black population declined significantly from 2000 to 2010 in many neighborhoods including Columbia Heights, Petworth, and Brightwood Park.<sup>113</sup>

While the share of Black residents in some D.C. neighborhoods has declined, the share of the city's Black residents who live east of the Anacostia River increased from 41% in 2007 to 47% in 2015 and the share of the city's poor residents who live east of the Anacostia River similarly rose from 40% in 2007 to 47% in 2015.<sup>114</sup> Displacement may thus be contributing to patterns of economic and racial segregation as low-income people of color moving out of gentrifying neighborhoods increasingly concentrate in the eastern neighborhoods of D.C. and in areas of Maryland to the northeast and southeast of D.C.

Displacement due to economic pressures also contributes to the perpetuation of R/ECAPs. Vulnerable residents living near the poverty line who are displaced from their original homes seek affordable housing options, many of which are located in R/ECAPs. As low-income people of color are displaced and move to R/ECAPs, the concentration of low-income residents is reinforced.

Displacement is also a contributing factor to disproportionate housing needs. When residents lack quality affordable housing options and are displaced, they may end up choosing to live in housing that is affordable but that has substandard conditions. Residents may also choose to put up with substandard conditions in order to avoid the threat of displacement from affordable housing. Additionally, displacement can lead to residents staying with family or friends, leading to potential overcrowding. Landlords who have an economic incentive to displace tenants may contribute to substandard conditions in some cases. Stakeholders have also reported instances of landlords seeking to benefit economically from gentrification by letting housing decay. When units are not maintained, tenants may have no choice but to move out. Landlords then can redevelop properties and make greater profits.

#### Lack of community revitalization strategies

Lack of community revitalization strategies is a contributing factor to fair housing issues in D.C. While the District has a number of programs intended to encourage investment in its neighborhoods, these strategies are not enough to address the greater needs of communities in need of access to services, amenities, and good jobs. This lack of development, in turn, makes it challenging to attract households with a range of incomes, as would be needed to create stable mixed-income neighborhoods.

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<sup>112</sup> <https://ncrc.org/download/56067/>

<sup>113</sup> <http://apps.urban.org/features/OurChangingCity/demographics/#race>

<sup>114</sup> <https://www.dcfpi.org/all/dcs-black-residents-increasingly-live-east-of-the-anacostia-river/>

The Department of Small and Local Business Development has a few initiatives geared towards promoting neighborhood revitalization. The District has designated certain neighborhoods as Business Improvement Districts (BIDs) in order to encourage investment, but investment remains uneven throughout the city. The DC Main Streets Program encouraged revitalization by recruiting businesses for historic Main Streets in the city. Additionally, the Department's Clean Team Program helps with the removal of litter and graffiti and general maintenance of city properties. Areas surrounding D.C. also have revitalization projects underway. For example, in Arlington Virginia, the area's Commercial Revitalization Program has targeted Nauck Town Square and Penrose Square for commercial revitalization efforts, including streetscaping, public art, and transportation improvements. Prince George's County has adopted similar efforts, including a recently-announced \$1.9 million investment in shopping centers that have dilapidated.

While the District attracts a significant amount of private investment, investment is unevenly distributed across the city and areas like Wards 7 and 8 still suffer from disinvestment. The District has encouraged improvements to housing, rehabilitated housing, incentives for businesses, and other means of community revitalization, but such tactics are more effective in neighborhoods which are already targets for increased investment. For example, a community group in Anacostia had to start a campaign for its only sit-down restaurant in the neighborhood, whereas there is significantly more competition for retail space in areas of the city like Wards 2 and 3.<sup>115</sup> Community revitalization strategies must be more evenly distributed and more effective in areas with greater need.

#### Lack of private investments in specific neighborhoods

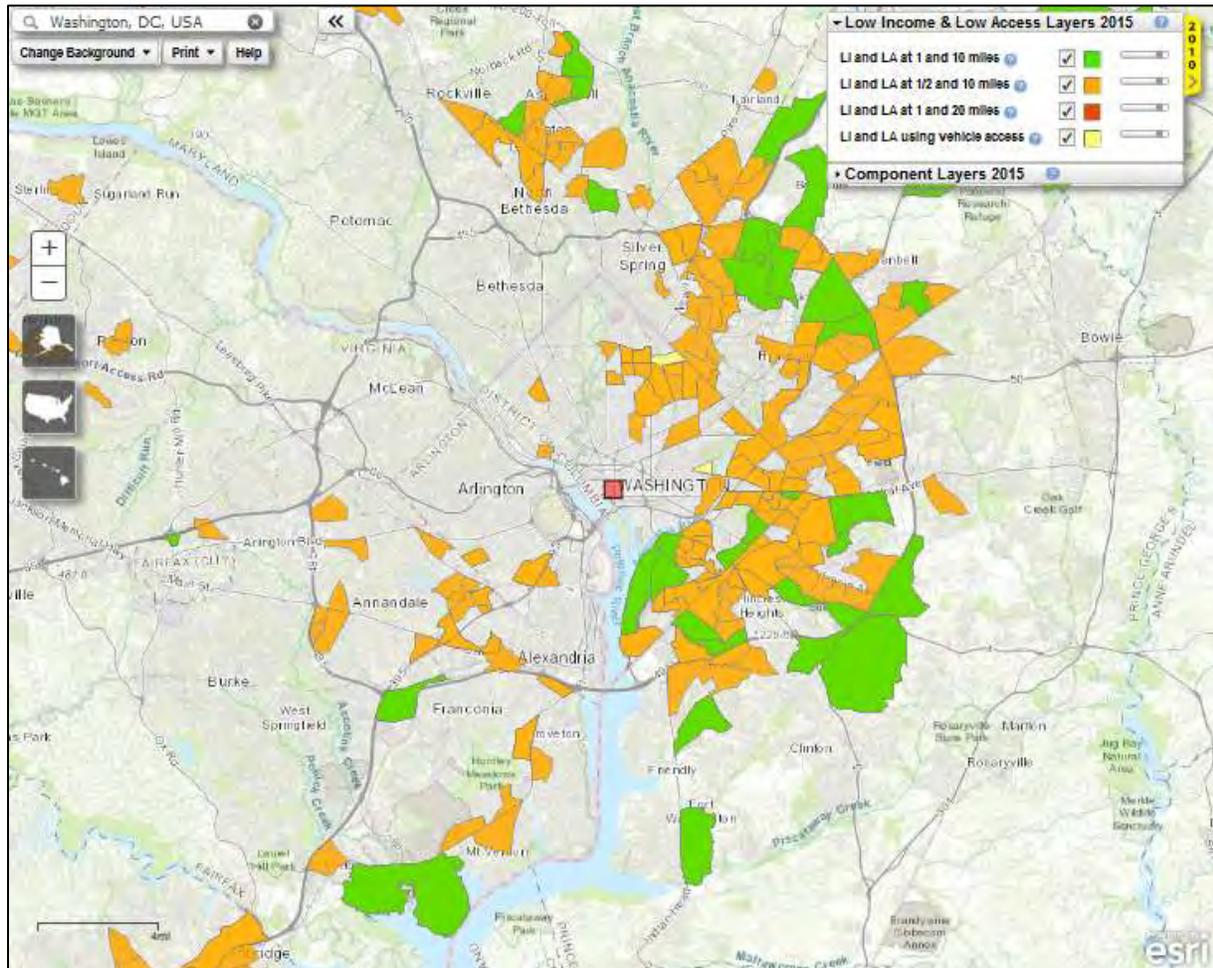
Lack of private investment in specific neighborhoods is a contributing factor to fair housing issues in D.C. As with a lack of revitalization strategies, the lack of private investment contributes to segregation due to its effect on neighborhood amenities and resources, and the way that it therefore makes a neighborhood less likely to attract a range of residents at various income levels. A lack of private investment also contributes to a lack of services and amenities such as retail stores that can affect quality of life and access to opportunity for existing residents.

One indicator of a lack of private investment in specific neighborhoods is the presence of food deserts in a jurisdiction. A food desert is defined as a lack of grocery stores in a particular area, such that residents will have to travel more than one mile in urban areas, or ten miles in rural areas, to access a grocery store. The map below indicates areas that are food deserts. The areas colored in green indicate areas where grocery stores are more than 1 mile away (in urban areas). The areas colored in orange indicate areas where grocery stores are more than ½ miles away (in urban areas). The areas colored in yellow indicate areas where the distance to the supermarket is compounded by a significant share of the population that does not have a vehicle. Significant portions of Southeast D.C. are considered food deserts, as well as parts of neighboring Maryland. Far more areas are shaded in orange than green, which indicates a shorter distance to the grocery store, while not discounting the hardship in accessing them. Only two areas are colored in yellow, indicating both distance and a lack of access to transportation for obtaining groceries.

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<sup>115</sup> <https://ggwash.org/view/69641/for-us-by-us-community-revitalization-tips-from-the-we-are-anacostia-commun>

The vast majority of tracts labeled as food deserts closely align with the segregation patterns in the city.



Another indicator of a lack of private investment in certain neighborhoods is a lack of pharmacies. Pharmacies tend to be located in grocery stores, but additionally, there are several choices of Walgreens, CVS, and others throughout the city. Since many pharmacies are located in grocery stores, the food deserts present in the eastern part of D.C. also means that there is a similar lack of pharmacies in that area. It should be noted that those covered by Kaiser Permanente insurance can only use Kaiser Permanente pharmacies. There are only two such pharmacies in the city.

A third indicator of a lack of private investment in certain neighborhoods is a lack of banks. The lack of access to financial services in D.C. for lower income people has been discussed in more detail in that contributing factor. Briefly, there do seem to be disparities in access to financial services, which might indicate a lack of private investments in specific neighborhoods, or at least, an increase in the presence of predatory financial services in less affluent areas.

A final indicator of a lack of private investment in certain neighborhoods is the issuance of building permits across the jurisdiction. While the same portal that describes housing code

violations also notes building permits, the portal does not map them or tabulate by ward. In raw numbers, it seems that building permits are being issued at the same rate as in previous years.<sup>116</sup> Finally, it should be noted that in D.C., as in other rapidly gentrifying areas, increases in private investments in specific neighborhoods tend to coincide with gentrification, meaning that the benefits that such development would bring to low-income residents often fails to reach them. This relationship between private investment and gentrification has negatively affected some people's perceptions such that they rationally fear that an increase in private investment, which might improve their quality of life, will ultimately result in them being pushed out of their neighborhood. Private investment in the greater region tends to segregate along the 16th Street NW area in D.C. and along I-95 in Maryland and Virginia, with most investment on the western side of this line in more affluent areas while lower-income, majority-minority areas on the eastern side experience less investment.

#### Lack of public investments in specific neighborhoods, including services or amenities

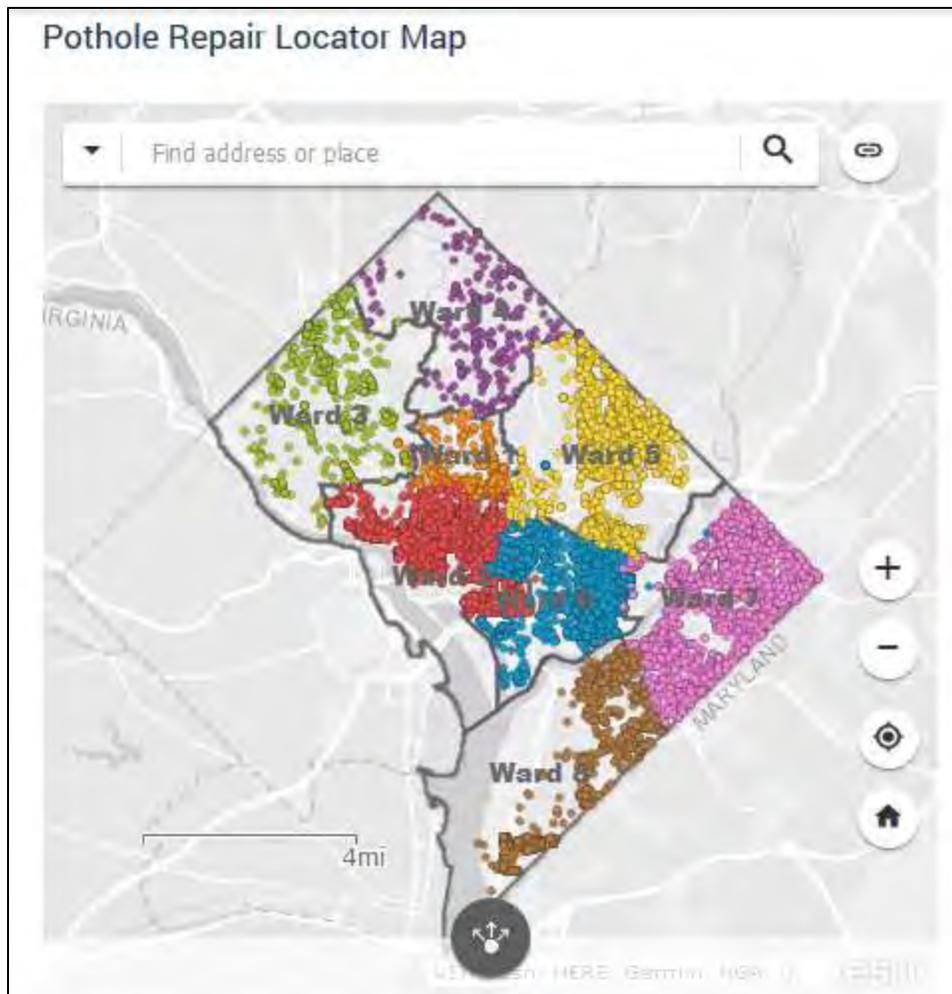
Lack of public investment in specific neighborhoods, including services and amenities is a contributing factor to segregation, disparities in access to opportunity, R/ECAPs, and disproportionate housing needs. A lack of public investments for communities east of the Anacostia River contributes to a lack of services and amenities that limits the appeal of housing in these neighborhoods, contributing to a highly segregated regional housing market. Furthermore, a lack of services and amenities such as well-maintained infrastructure does not serve existing residents well. The absence of services and amenities can reduce quality of life and opportunities.<sup>117</sup> One strong indicator of public investment in specific neighborhoods is the condition of paved roads and sidewalks. The D.C. Department of Transportation allows residents to report potholes, and the DDOT's standard is to repair such potholes within three business days.<sup>118</sup> The map below indicates the prevalence of potholes per ward. While affluent Wards 3 and 4 have relatively few, Ward 7 particularly stands out with its large number of reported potholes.

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<sup>116</sup> <https://eservices.dcrd.dc.gov/DCRAAgencyDashboard/index>

<sup>117</sup> Sayin Taylor, Y. (March 2018) "Taking Stock of the District's Housing Stock." DC Policy Center. [https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final\\_March25.pdf](https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final_March25.pdf), pg. 25.

<sup>118</sup> <https://ddot.dc.gov/potholes>



The city also repairs sidewalk issues as reported by residents.<sup>119</sup> However, the sidewalk repair schedule is much less vigorous, with a timeline of up to 25 business days. This can pose a particular impediment to wheelchair users who may have difficulty navigating damaged sidewalks. Unlike potholes, the District does not comprehensively map sidewalk repairs on its website.

In the greater region, public investment is divided by race and income. Most public investment occurs in middle- and upper-income communities while lower-income and majority-minority areas experience more limited public investment. The dividing line is along 16<sup>th</sup> Street NW in D.C. and I-95 in Maryland and Virginia.

#### Lack of local or regional cooperation

A lack of local or regional cooperation is a contributing factor to segregation and disproportionate housing needs. The D.C. region is facing a housing shortage as the region continues to grow but housing development has been unevenly distributed. The District has

<sup>119</sup> <https://ddot.dc.gov/service/sidewalk-repair>

experienced the largest growth in new housing construction in the urban core of the region. Between 2000 and 2017, the District added the largest share of housing units in the urban core as the District built more housing units than Arlington County and the City of Alexandria combined. The majority of new housing units in the region built since 2000 have also been single-family homes, which has implications for future housing affordability.

Much of the focus of regional collaboration efforts has been on transportation, such as the recent successful effort to secure dedicated funding for the Washington Metropolitan Area Transit Authority (WMATA). The Metropolitan Washington Council of Governments (COG) is an organization that works to coordinate regional decision-making. Much of its focus has also been on transportation rather than on housing. More recently, COG has turned its attention to housing needs and emphasized the need for the region to produce more housing.<sup>120</sup> In late 2018, COG launched a Regional Housing Initiative to assess the amount, accessibility, and affordability of additional units needed to address a regional shortfall in housing.<sup>121</sup> As a result of the initiative, COG released a report on September 10, 2019 outlining three regional housing targets for member governments to pursue in order to address housing production and affordability challenges. These targets include 1) producing at least 320,000 housing units in the region between 2020 and 2030; 2) ensuring that at least 75% of all new housing should be in activity centers or near high-capacity transit; and 3) making at least 75% of new housing affordable to low-and-middle-income households.<sup>122</sup> COG representatives adopted a resolution to set the regional targets and that calls on local officials to work within their communities in order to adopt local-level targets on production, accessibility, and affordability.<sup>123</sup>

While these housing targets are important to help meet regional housing needs, COG lacks decision-making power and has no power to make local jurisdictions implement its recommendations. Local jurisdictions are free to ignore the regional housing targets if they choose. A recent report by the Urban Land Institute also notes that there is a lack of coordination in the D.C. area as the inner core spans across states.<sup>124</sup> This makes it harder to adopt policies such as setting housing production targets for jurisdictions. Additionally, the report highlights that jurisdictional policies regarding local development vary significantly and that specific planning efforts to accommodate housing growth are the responsibility of local jurisdictions, which makes the advancement of regional priorities more difficult.<sup>125</sup> More needs to be done to ensure that local jurisdictions will follow through and execute a regional vision for housing.

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<sup>120</sup> <https://www.mwcog.org/newsroom/2018/09/12/new-cog-analysis-recommends-increase-in-area-housing-production/>

<sup>121</sup>

<https://www.mwcog.org/community/planning-areas/housing-and-homelessness/regional-housing-initiative/>

<sup>122</sup> Metropolitan Washington Council of Governments, *The Future of Greater Washington: A Regional Initiative to Create Housing Opportunities, Improve Transportation, and Support Economic Growth 2* (Sep. 10, 2019), <https://www.mwcog.org/file.aspx?D=1KDdkQrGGIG1pVFUmNmSIQN5%2fAy8hT12LYT5re%2f14Ys%3d&A=%2bMuP0FdKmk3DLhEx3thTiAUvJU8YEzEd4F5hNvLignY%3d>

<sup>123</sup> <https://www.mwcog.org/newsroom/2019/09/11/officials-set-regional-housing-targets-call-for-collaboration-to-address-production-and-affordability-challenges/>

<sup>124</sup> *Increasing Housing Supply and Attainability: Improving Rules & Engagement to Build More Housing*, <https://ulidigitalmarketing.blob.core.windows.net/ulidenc/2019/05/5cdc286d6aca1-5cdc286d6aca4Achieving-Housing-Affordability-Final-041519-4.pdf.pdf>

<sup>125</sup> *Id.* at 17.

## Land use and zoning laws

Current land use and zoning laws are a major contributing factor to segregation and disproportionate housing needs in D.C. Land use and zoning laws significantly affects housing development patterns. A large portion of the land in D.C. designated for residential housing is zoned for low-density, single family units. Indeed, while single family homes make up 30% of D.C.'s total housing stock, they account for 80% of residential buildings in the city.<sup>126</sup> Some neighborhoods, such as many in upper Northwest, therefore build very little or no housing per year.<sup>127</sup> Single-family homes are on average more expensive to rent or buy than other types of housing.<sup>128</sup> The large amount of land reserved for single family homes means that there is a limited amount of space available to build a mix of housing types that may be more affordable to families and that can accommodate more residents. Consequently, much of the housing development in recent years has been highly uneven with new construction concentrated in just a few areas such as Shaw, the Southwest Waterfront, NoMa, and Navy Yard.<sup>129</sup> More than half of the new housing units built in D.C. between 2008 and 2015 were concentrated in just four Advisory Neighborhood Council (ANC) areas while nearly one-third of the city's census tracts had no permits for new housing during the same time period.<sup>130</sup>

Other land use rules further affect housing development. For instance, D.C. has a disproportionately large amount of land designated as historic districts. Historic district rules impose requirements that homeowners must adhere to and make it more difficult to construct, expand, and renovate housing.<sup>131</sup> Historic preservation can be used as a tool by residents to prevent development in their neighborhoods. Additionally, zoning restrictions on height as well as the federal Height of Buildings Act limit the ability to develop taller housing. Other policies such as minimum parking requirements and lot coverage maximums can also reduce the number of units that can be built on a site and contribute to difficulties in producing more housing.

Restrictive zoning and land use laws also help to drive up the costs of housing construction and limit the development of new housing in much of the city, particularly in high-opportunity areas. This especially contributes to an inequitable distribution of affordable housing in the city as developers build in lower income areas where there is more available land and where housing construction is more financially feasible. Additionally, limiting housing construction in more affluent areas effectively renders these areas off-limits to growth and can lead to increased displacement pressures and gentrification elsewhere as pent-up demand for housing is redirected to moderate-income and low-income areas.<sup>132</sup> Collectively, zoning and land use laws have the effect of limiting the supply of housing and excluding many middle-income and low-income

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<sup>126</sup> [https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final\\_March25.pdf](https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final_March25.pdf)

<sup>127</sup> <https://www.brookings.edu/blog/the-avenue/2018/05/10/in-whose-backyards-has-d-c-built-new-housing/>

<sup>128</sup> Id.

<sup>129</sup> Id.

<sup>130</sup> Id.

<sup>131</sup>

[https://wamu.org/story/16/09/13/on\\_capitol\\_hill\\_tension\\_between\\_history\\_and\\_growth\\_comes\\_down\\_to\\_a\\_single\\_street/](https://wamu.org/story/16/09/13/on_capitol_hill_tension_between_history_and_growth_comes_down_to_a_single_street/)

<sup>132</sup> <https://www.brookings.edu/blog/the-avenue/2018/05/10/in-whose-backyards-has-d-c-built-new-housing/>

residents from large swaths of the city. This contributes to the creation of separate housing markets in D.C. which perpetuate deeply entrenched patterns of residential segregation.

The District's Inclusionary Zoning (IZ) program is one of the city's key programs to produce new affordable housing and can be a tool to help combat residential segregation. The IZ program requires that 8-10% of a residential building's floor area be set aside for affordable rental or for-sale units in new residential development projects of 10 or more units and rehabilitation projects that are expanding an existing building by 50% or more and adding 10 or more units.<sup>133</sup> IZ units are set aside for families earning 50%, 60%, or 80% of area median family income (MFI)<sup>134</sup> Households in IZ units must certify that they will not spend more than 50% of their annual income on housing costs.<sup>135</sup> According to DHCD's annual report on the IZ program, the IZ program produced 198 units in Fiscal Year 2018 and as of September 30, 2018, a total of 792 IZ units have been produced since the first IZ unit was delivered in 2011.<sup>136</sup> Of the IZ units produced in FY 2018, 29% were studios, 40% were one bedrooms, and 24% were two bedrooms.<sup>137</sup> In addition, 78% of IZ units were produced for households earning 80% MFI while 18% were set aside for households earning 50% of MFI and 4% of units were set aside for households earning 60% MFI.<sup>138</sup> Most IZ units are located near the core of the city where the bulk of new residential development activity is occurring with relatively few units being produced east of the Anacostia River or in upper Northwest.<sup>139</sup> The IZ program has largely successfully produced affordable housing without contributing to existing concentrations of affordable units. However, the program may not be producing enough family-sized units or enough units for households that have lower incomes and a greater need for affordable housing.

Land use and zoning laws are a contributing factor to disparities in access to opportunity. Many of the D.C. neighborhoods with the lowest crime rates, highest-performing schools, and access to quality retail and transit are zoned primarily for single family homes, which are generally more expensive than multifamily units. For example, almost all of Ward 3's residential land designated for single family homes.<sup>140</sup> In contrast, multifamily units occupy a majority of residential land in Ward 8.<sup>141</sup> Land use and zoning laws thus prevent a mix of housing types and more affordable housing from being built in many areas of opportunity. This has the effect of excluding many people from living in these neighborhoods, contributing to disparities across a wide set of areas.

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<sup>133</sup> <https://dhcd.dc.gov/service/inclusionary-zoning-affordable-housing-program>

<sup>134</sup>

[https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service\\_content/attachments/Inclusionary%20Zoning%20Program%20Fact%20Sheet%202018.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/service_content/attachments/Inclusionary%20Zoning%20Program%20Fact%20Sheet%202018.pdf)

<sup>135</sup> [https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/publication/attachments/IZ\\_Final\\_Regulations\\_2017.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/publication/attachments/IZ_Final_Regulations_2017.pdf)

<sup>136</sup> Inclusionary Zoning Fiscal Year 2018 Annual Report,

[https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/page\\_content/attachments/FY%202018%20Inclusionary%20Zoning%20Annual%20Report\\_0.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/page_content/attachments/FY%202018%20Inclusionary%20Zoning%20Annual%20Report_0.pdf)

<sup>137</sup> Id. at 7.

<sup>138</sup> Id. at 10.

<sup>139</sup> Id. at 15.

<sup>140</sup> <https://www.dcpolicycenter.org/publications/discriminatory-housing-practices-in-the-district-a-brief-history/>

<sup>141</sup> [https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final\\_March25.pdf](https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final_March25.pdf)

Current land use and zoning laws can contribute to disproportionate housing needs. People of color disproportionately reside in high-density housing, which can generally be built in areas zoned for multi-family housing, multiple dwellings, or single-family homes on small lots. The majority of land in many high-opportunity areas is designated for low-density single-family homes. Strict planning codes and zoning in jurisdictions can also restrict the ability to add more housing and alleviate cost burdens on households. Additionally, policies such as minimum parking requirements, height limits, and lot coverage maximums can reduce the number of units that can be built on a site.

### Lending discrimination

Lending discrimination is a contributing factor to fair housing issues. According to Home Mortgage Disclosure Act (HMDA) data from 2016, residents of color in the D.C. region are denied loans at significantly higher rates than White residents even when controlling for applicants' income, loan amounts, and certain neighborhood characteristics.<sup>142</sup> In the D.C. region, Native American applicants are 2.3 times as likely to be denied a conventional home mortgage as White residents while Black applicants are 2.2 times as likely to be denied. Latino applicants are 1.9 times as likely to be denied as Whites and Asian applicants are 1.6 times as likely to be denied. An analysis found that the D.C. area was the only metropolitan area in the country with statistically significant disparities for all of the non-White groups studied: Blacks, Asians, Hispanics, and Native Americans. A separate analysis focusing on Chase Bank loans in 2015 and 2016 found that the bank denied 26% of Black applicants and 18% of Latinos in the D.C. metro area compared to 7% of White applicants.<sup>143</sup> The bank also concentrated its lending in affluent White neighborhoods while rarely making loans in higher-income Black neighborhoods.<sup>144</sup> When residents are denied access to lending, they may be unable to access certain neighborhoods and therefore have limited housing choice. Lending discrimination thus reinforces patterns of residential segregation.

Lending discrimination is a contributing factor to the perpetuation of R/ECAPs. Families living in poorer neighborhoods of color are less likely to be able to obtain loans. Many families therefore are unable to obtain homeownership and build wealth. Lending discrimination contributes to a cycle of disinvestment in poor neighborhoods of color. The practice of reverse redlining, which targets people of color for predatory lending, has a further detrimental impact on poorer neighborhoods. In the years before the foreclosure crisis, Black and Latino residents in D.C. were substantially more likely to receive subprime loans than white residents.<sup>145</sup>

Lending discrimination is also a contributing factor to disparities in access to opportunity. Families often use home equity as a source of wealth. Overall, the typical household has about two-thirds of its wealth derived from home equity.<sup>146</sup> However, Black homeownership in D.C. is

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<sup>142</sup> <https://www.revealnews.org/article/for-people-of-color-banks-are-shutting-the-door-to-homeownership/>

<sup>143</sup> <https://www.revealnews.org/article/chase-rarely-lends-to-people-of-color-in-dc-and-its-probably-legal/>

<sup>144</sup> Id.

<sup>145</sup> [https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital\\_8.pdf](https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital_8.pdf)

<sup>146</sup> <https://www.epi.org/blog/the-racial-wealth-gap-how-african-americans-have-been-shortchanged-out-of-the-materials-to-build-wealth/>

significantly lower than for whites.<sup>147</sup> The inability of many families of color to access homeownership contributes to wide racial disparities in wealth. In 2014, the median white household in D.C. had \$284,000 in wealth compared to \$13,500 for Latino families and just \$3,500 for Black families.<sup>148</sup> This large racial wealth gap impacts mortgage applicants as well as future generations. The transfer of wealth across generations can affect economic security and educational attainment for the next generation.<sup>149</sup>

Lending discrimination also contributes to disproportionate housing needs, as class groups who struggle to obtain access to loans are more likely to experience housing problems such as cost burdens, overcrowding, and substandard housing. When banks and other financial institutions deny applications to people of color, applicants cannot achieve home ownership and instead must turn to the rental market. As D.C.'s rental housing market grows increasingly unaffordable, Blacks and Hispanics are disproportionately impacted. HMDA data does not track denials based on disability, thus it is difficult to determine if lending discrimination is a contributing factor to disability and access.

### Location and type of affordable housing

The location and type of affordable housing is a major contributing factor to segregation and disproportionate housing needs in D.C. Most affordable housing is located in the eastern part of the city while much of Northwest has very little affordable housing. This distribution affects where low-income people can live and contributes to the concentration of low-income people of color in the eastern neighborhoods of D.C.

In 2018, the D.C. Policy Center estimated that there are about 319,800 units in D.C. spread across 116,781 buildings.<sup>150</sup> The geographic distribution of the most and least affordable housing units in D.C. is indicative of the level of economic segregation in the city. Outside downtown, the housing stock is spread across low-rise, low-density buildings. Restrictive land use practices that favor single-family units are a major factor of exclusion in D.C. For example, eight assessment neighborhoods in Northwest—Hawthorne, Colonial Village, Woodley, Foxhall, Burleith, Kent, Spring Valley and Berkley—average just one unit per building.<sup>151</sup> These neighborhoods, full of single-family homes, are also some of the most expensive to rent or own housing in the city.

Meanwhile, virtually all units most affordable to low-income families are in Southeast.<sup>152</sup> For families making 50 percent of the Area Median Income, all units deemed affordable (defined as

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<sup>147</sup> [https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital\\_8.pdf](https://www.urban.org/sites/default/files/publication/85341/2000986-2-the-color-of-wealth-in-the-nations-capital_8.pdf)

<sup>148</sup> <https://www.dcfpi.org/all/economic-inequality-in-dc-reflects-disparities-in-income-wages-wealth-and-economic-mobility-policy-solutions-should-too/>

<sup>149</sup> [https://socialequity.duke.edu/sites/socialequity.duke.edu/files/site-images/FINAL%20COMPLETE%20REPORT\\_.pdf](https://socialequity.duke.edu/sites/socialequity.duke.edu/files/site-images/FINAL%20COMPLETE%20REPORT_.pdf)

<sup>150</sup> Sayin Taylor, Y. (March 2018) "Taking Stock of the District's Housing Stock." DC Policy Center. [https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final\\_March25.pdf](https://www.dcpolicycenter.org/wp-content/uploads/2018/03/DC-Policy-Center-Housing-Report.final_March25.pdf), pg. iii.

<sup>151</sup> Sayin Taylor, pg. iii.

<sup>152</sup> Sayin Taylor, pg. 31.

units that do not require paying more than 30 percent of income for housing) are all east of the Anacostia River.<sup>153</sup> Units that require a family of four to have an annual income of \$276,000 or more (2.5 times the area median income) are concentrated west of Rock Creek Park, with the exception of Capitol Hill.<sup>154</sup> Some of the most desirable neighborhoods in D.C. are located in Ward 3, thanks to their high-performing schools, grocery store access, and recreation space.<sup>155</sup> The dearth of affordable housing west of Rock Creek Park means that high- and low-income residents in the city live far away from each other, sharing very little with one another.

Many residents, especially low-income and middle-class residents, face challenges finding affordable housing when attempting to move to an area or neighborhood of their choice. For those seeking income-restricted affordable housing, options in upper Northwest are limited. Only 1 percent of all income-restricted affordable housing in D.C. as of 2018 is located west of Rock Creek Park while 50 percent is located east of the Anacostia River.<sup>156</sup> The Rock Creek East planning area, which includes all of Ward 4 east of the Park, held 5 percent of the stock, Near Northwest had 8 percent, Capitol Hill had 3%, Upper Northeast held 9 percent, and the Mid-City planning area, including the neighborhoods of Adams Morgan, Bloomingdale, Eckington, Columbia Heights, U Street, Shaw, and Mt. Pleasant, held 13 percent.<sup>157</sup> The concentration was far and away the greatest in Wards 7 and 8, where many low-income families already reside, indicating that residents in these Wards who may wish to move to a different area face difficulties finding options.

Additionally, adding just one low-rise multifamily building with 100 units in each of the eight neighborhoods in Northwest with an average of one unit per building would increase their housing units by 16 percent while only increasing the number of buildings by 0.2 percent.<sup>158</sup> In this scenario, a potential 800 new families could benefit from the opportunities in these neighborhoods, which include access to employment centers and good schools.

Mayor Bowser has declared that the District must do more to equitably distribute new affordable housing. In her second inaugural address, the mayor called for the District to add 36,000 units of housing, with 12,000 of them being affordable, by 2025 to help address the demand for housing in the city.<sup>159</sup> To help meet this goal, the Mayor issued an order to District government agencies to explore and implement policy approaches. An important fair housing component of the order directs the D.C. Office of Planning (OP) to propose area-specific fair share targets for affordable housing production by 2025 to help achieve an equitable distribution of affordable housing in the city by 2045.<sup>160</sup> More equitable distribution of housing is needed in the city. However, the District must carefully consider how it will define affordability for new units, whether new affordable units will be large enough to accommodate families, and how new affordable housing will be funded.

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<sup>153</sup> Sayin Taylor, pg. 32.

<sup>154</sup> Sayin Taylor, pg. 32.

<sup>155</sup> Sayin Taylor, pg. iii.

<sup>156</sup> DC Office of Planning. (2018) "Income-Restricted Affordable Housing by Comprehensive Plan Planning Area."

<sup>157</sup> D.C. Office of Planning.

<sup>158</sup> Sayin Taylor, pg. iii.

<sup>159</sup> <https://mayor.dc.gov/release/mayor-bowser-signs-order-drive-bold-goal-36000-housing-units-2025>

<sup>160</sup> [https://ggwash.org/files/2019-036\\_Housing\\_Initiative\\_\(5.10\).pdf](https://ggwash.org/files/2019-036_Housing_Initiative_(5.10).pdf)

## Location of publicly-supported housing and households

This is a significant contributing factor to segregation and R/ECAPs within the District, and is discussed at length in the “publicly supported housing” section below.

## Loss of affordable housing

Loss of affordable housing is a major contributing factor to disproportionate housing needs, as well as to segregation in D.C. and the region, because it makes many neighborhoods increasingly out of reach for a diverse resident population. According to a study by the D.C. Fiscal Policy Institute, in 2015 there were half as many low-cost units in D.C. as in 2002, while the number of apartments with higher rents had risen significantly.<sup>161</sup> While rents have grown faster than income for virtually all households in D.C., rental housing production has also shifted to meet demand for higher-priced luxury units, dwindling the number of low-cost units.<sup>162</sup> From 2002 to 2013, the number of rental units priced at \$1,400 or more grew from 28,000 units to 73,000 units, and as of 2015, represented half of the rental stock.<sup>163</sup> Meanwhile, the number of apartments with rent and utilities below \$800/month had been close to 30,000 since 2010, which is roughly the number of homes in D.C. receiving housing subsidies.<sup>164</sup> These findings suggest that subsidized housing is now the main source of inexpensive apartments.

Even with the recent development boom, the majority of residential properties in D.C. were built over fifty years ago, with nearly 42 percent between 1921 and 1951.<sup>165</sup> An estimated 1,246 assisted units throughout the city are currently at risk of being lost through conversion to market-rate, non-affordable units or through demolition. An additional 15,226 assisted units have subsidies that are expiring before or in 2020 and may be at risk of loss in the future.<sup>166</sup> Based on the city’s development pipeline, the District is projected to add 13,930 units of affordable housing from 2011 to 2020.<sup>167</sup> The Urban Institute projects that the majority of new affordable housing units will be accessible to low income households, but not necessarily for very low and extremely low income households.<sup>168</sup> In fact, they project a net loss of housing units affordable to extremely low income and very low income households by 2020, primarily due to a loss of market-rate affordable housing.<sup>169</sup> Overall, projections show that if current demographic trends hold, most of the city’s population growth will be among non-Hispanic whites living in one- or two-person households with incomes above 80 percent of the Area Median Income.<sup>170</sup> For

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<sup>161</sup> Rivers, W. (March 2015) “Going, Going, Gone: DC’s Vanishing Affordable Housing.” DC Fiscal Policy Institute. <https://www.dcfpi.org/wp-content/uploads/2015/03/Going-Going-Gone-Rent-Burden-Final-3-6-15format-v2-3-10-15.pdf>, pg. 2.

<sup>162</sup> Rivers, pg. 2-4.

<sup>163</sup> Rivers, pg. 6.

<sup>164</sup> Rivers, pg. 4.

<sup>165</sup> Tatian, P., Leopold, J., Oo, E., Joseph, G., MacDonald, G., Nichols, A., Woluchem, M., Zhang, S., Abazajian, K. (May 2015) “Affordable Housing Needs Assessment for the District of Columbia.” The Urban Institute. [https://www.urban.org/sites/default/files/publication/50151/2000214-affordable-housing-needs-assessment-for-the-district-of-columbia\\_0.pdf](https://www.urban.org/sites/default/files/publication/50151/2000214-affordable-housing-needs-assessment-for-the-district-of-columbia_0.pdf), pg. 2.

<sup>166</sup> Tatian et. al, pg. 4.

<sup>167</sup> Tatian et. al, pg. 3.

<sup>168</sup> Tatian et. al, pg. 3.

<sup>169</sup> Tatian et. al, pg. 3.

<sup>170</sup> Tatian et. al, pg. 2.

residents who currently have trouble finding affordable housing, this means the inequality they face now in the housing market will be maintained if not exacerbated. Additionally, the majority of new affordable units to be built by 2020 are located in Wards 6, 7, and 8, setting the stage for further segregation in D.C. across race and income lines.<sup>171</sup>

### Occupancy Codes and Restrictions

Occupancy codes and restrictions are not a significant contributing factor to fair housing problems in D.C. The 2013 District of Columbia Construction Codes follows the International Code Council and the 2011 National Electrical Code, with some amendments. The 2015 Virginia Construction Code follows the International Code Council and the National Electrical Code. District Municipal Regulations define “family” under the zoning regulations as “one (1) or more persons related by blood, marriage, or adoption, or not more than six (6) persons who are not so related, including foster children, living together as a single house-keeping unit, using certain rooms and housekeeping facilities in common; provided, that the term family shall include a religious community having not more than fifteen (15) members.”<sup>172</sup> Although treating smaller group homes more favorably than larger group homes benefits community-integration for persons with disabilities, it is important that the District grant reasonable accommodations to allow larger group homes when the need arises. Overall, the District’s definition of family is consistent with fair housing principles.

### Private discrimination

Private discrimination is a contributing factor to segregation in D.C. While DC law provides more protection than the Fair Housing Act, housing discrimination remains a problem. Private discrimination is difficult to detect and often goes unreported.<sup>173</sup> However, housing testing is one way to uncover discrimination. A recent investigation by the Equal Rights Center measured private discrimination against white and Black female potential homebuyers with criminal records. In almost half of the tests conducted, an agent engaged in differential treatment that favored the white tester versus the black tester.<sup>174</sup> In general, Black testers received more negative reactions than their white counterparts, and agents provided each group with different information or varying quality of service.<sup>175</sup> Additionally, in a few cases during the test, the white testers were given reassuring speculation from the agent about their perceived criminal record that the black testers were not.<sup>176</sup> Even when renters or homebuyers are stratified across lines like a criminal record, racial discrimination still exists.

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<sup>171</sup> Tatian et. al, pg. 3.

<sup>172</sup> <http://dcrules.elaws.us/dcmr/11-199>

<sup>173</sup> Ally Schweitzer, Housing Discrimination Rife in D.C. Region 50 Years After Fair Housing Became Law, <https://wamu.org/story/18/04/11/housing-discrimination-rife-d-c-region-50-years-fair-housing-became-law/>

<sup>174</sup> Scott, K., Brown, C., McKenzie, B., McClannahan, S. (2016) “Unlocking Discrimination: A DC Area Testing Investigation About Racial Discrimination and Criminal Records Screening Policies in Housing.” Equal Rights Center. <https://www.documentcloud.org/documents/3144623-Unlocking-Discrimination-A-Report-From-The-Equal.html>

<sup>175</sup> Scott et. al, pg. 22.

<sup>176</sup> Scott et. al, pg. 26.

## Source of Income Discrimination

Source of income discrimination is a moderate contributing factor to fair housing issues in D.C. The D.C. Human Rights Act prohibits discrimination in housing on the basis of source of income.<sup>177</sup> OHR Guidance 16-01 explains that ‘source of income’ discrimination is illegal in D.C. This definition covers housing, “including the rental of a dwelling, services, facilities, and privileges”, and includes government subsidies, payments from federal and local programs, and vouchers in its description of ‘source of income’.

However, source of income discrimination remains pervasive and difficult to root out. A 2018 Urban Institute report found that many landlords routinely reject voucher holders when seeking renters for their properties. The researchers conducted about 4,000 tests in five cities including D.C. over a period of 16 months. Of the five sites studied, D.C. had the lowest rate of landlords who rejected housing vouchers as rental payments—15 percent, after testers posed as voucher holders from both the District of Columbia Housing Authority and the Housing Opportunities Commission of Montgomery County. Beyond the 15 percent, another 14 percent of landlords said they were either unsure about their own policy or that they accepted vouchers with certain conditions.<sup>178</sup> Additionally, the researchers acknowledge that they did not go beyond the initial stage of testing in D.C. Landlords could have discriminated against voucher holders later in the rental process—for example, standing up voucher holders for in-person appointments. A 2018 study from the Equal Rights Center similarly conducted fifteen source of income tests—over half of which revealed “concerning discrimination”.<sup>179</sup> Three tests reflected outright denials of the voucher, and five tests resulted in landlords providing incorrect or confusing information when asked whether they accepted vouchers from testers posing as potential applicants.<sup>180</sup> Despite the source-of-income protections that exist in D.C., landlords were able to reject voucher holders. Because discrimination against voucher holders in D.C. has a disparate impact on the basis of race, the Equal Rights Center concluded that source of income discrimination plays a role in maintaining and possibly increasing the severity of racial segregation within the D.C. housing market. The D.C. Attorney General’s office has recently used the District’s Consumer Protection Procedures Act (CPPA), which prohibits a variety of unlawful business practices, as one way to combat source of income discrimination.<sup>181</sup> However, more enforcement is needed to eliminate this discrimination.

## Access to financial services

Access to financial services is a contributing factor to disparities in access to opportunity in D.C. and the region. Within the metro area, low income people tend to be concentrated in the eastern part of D.C. and in neighboring counties in Maryland. The statistical indicators about a lack of financial services, therefore, tend to be much higher in D.C. itself than in the larger metro area.

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<sup>177</sup> <https://ohr.dc.gov/protectedtraits>

<sup>178</sup> Cunningham, M., Galvez, M., Aranda, C., Santos, R., Wissoker, D., Oneto, A., Pitingolo, R., Crawford, J. (Sept 2018) “A Pilot Study of Landlord Acceptance of Housing Choice Vouchers.” The Urban Institute. <https://www.huduser.gov/portal/sites/default/files/pdf/Landlord-Acceptance-of-Housing-Choice-Vouchers.pdf>

<sup>179</sup> Cunningham et. al, pg. 2.

<sup>180</sup> <https://equalrightscenter.org/wp-content/uploads/next-generation-segregation-report.pdf>

<sup>181</sup> <https://oag.dc.gov/release/ag-racine-sues-landlord-stop-illegal>

One indicator is the percentage of unbanked or underbanked people. In D.C. itself, 8% of households are unbanked, and 21.2% are underbanked.<sup>182</sup> In the region, the percentage of unbanked households falls dramatically, to 2.6%, while the percentage of underbanked households stayed about the same, at 21.4%.<sup>183</sup> Because D.C. is much more heavily Black than the broader region, it is likely that Black residents are disproportionately unbanked. Additionally, as the economy increasingly transitions into a cashless one, people who predominantly rely on cash (more than a third of D.C. residents) are getting increasingly left behind.<sup>184</sup> Such cashless businesses also have the potential to negatively affect homeless people who rely on cash donations.

Physical banks and ATMs are clearly concentrated in downtown D.C., along major roads, and along the Metro lines. Payday loan companies follow a similar trend, although they are much more noticeably present in the more residential areas on the eastern half of D.C. than the wealthy, predominantly White western half. Although members of protected classes in D.C. do experience other barriers to accessing financial services, those barriers are largely coextensive with the issue of lending discrimination, which is discussed in more detail in that contributing factor.

#### Availability, Type, Frequency, and Reliability of Public Transportation

Availability, type, frequency, and reliability of public transportation is not a significant contributing factor to impediments to fair housing. 2015 reports from the Washington Metropolitan Transit Authority's planning blog indicate that the District and Region will add 1 million people—a 16% increase—from 2020 to 2040, and much of this growth is concentrated in areas where the Metro transit infrastructure is already past its capacity.<sup>185</sup>

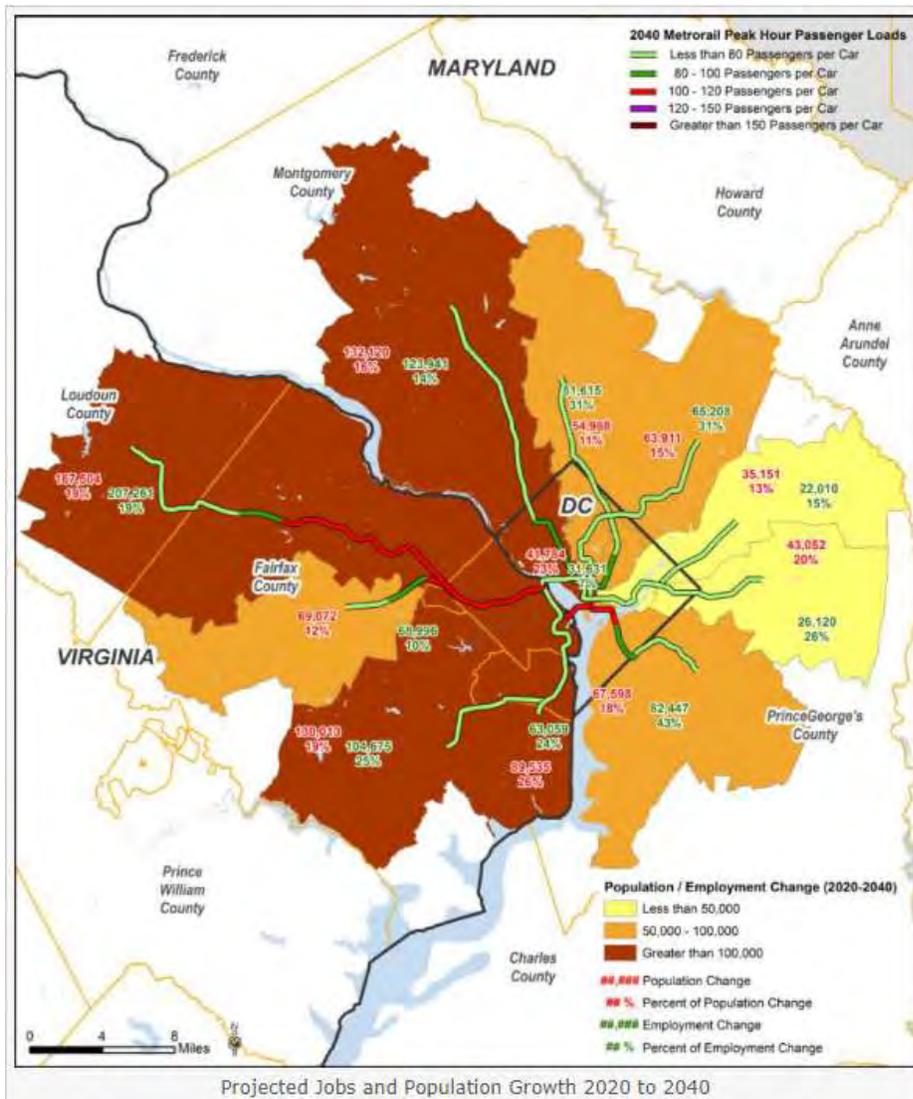
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<sup>182</sup> <https://www.fdic.gov/householdsurvey/2017/2017appendix.pdf>

<sup>183</sup> [https://economicinclusion.gov/surveys/place-data.html?where=Washington\\_Arlington\\_Alexandria\\_DC\\_VA\\_MD\\_WV&when=2017](https://economicinclusion.gov/surveys/place-data.html?where=Washington_Arlington_Alexandria_DC_VA_MD_WV&when=2017)

<sup>184</sup> <https://wamu.org/story/18/08/29/cashless-future-leave-many-d-c-residents-shortchanged/>

<sup>185</sup> <https://planitmetro.com/2015/11/09/beyond-borders-acting-regionally-to-create-a-financially-sustainable-transit-system/>



Since that time, Metro has invested over \$150 million in infrastructure improvements on the Metro system, but problems stemming from an aging system still persist.<sup>186</sup> Ridership has declined 13 percent between 2012 and 2017 because of wait times and unreliability.<sup>187</sup> However, the greater Region—including Maryland and Virginia—have joined with the District to provide \$500 million per year in dedicated funding for necessary improvements in the Metro system.<sup>188</sup>

#### Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a significant contributing factor to segregation in D.C. A 2019 study from the National Community Reinvestment Coalition

<sup>186</sup> <https://www.nytimes.com/2017/06/25/us/politics/washington-metro-mass-transit-150-million-upgrade.html>

<sup>187</sup> [https://www.washingtonpost.com/transportation/2019/05/06/study-its-past-time-dc-region-transforms-its-bus-network/?utm\\_term=.c617dc8347b7](https://www.washingtonpost.com/transportation/2019/05/06/study-its-past-time-dc-region-transforms-its-bus-network/?utm_term=.c617dc8347b7)

<sup>188</sup> [https://www.washingtonpost.com/local/trafficandcommuting/metro-gets-3rd-and-final-yes-as-maryland-commits-to-its-full-share-of-dedicated-funding/2018/03/22/ecd63946-2dfa-11e8-8ad6-fbc50284fce8\\_story.html?utm\\_term=.c92c0fef1e63](https://www.washingtonpost.com/local/trafficandcommuting/metro-gets-3rd-and-final-yes-as-maryland-commits-to-its-full-share-of-dedicated-funding/2018/03/22/ecd63946-2dfa-11e8-8ad6-fbc50284fce8_story.html?utm_term=.c92c0fef1e63)

quantified gentrification in various cities across the U.S. by analyzing eligible census tracts and assessing the educational level and economic status of residents, the values of properties in the neighborhood at the beginning of the census period and comparing them to changes in the next census, and identifying which tracts were in the top 60<sup>th</sup> percentile for increases in median home value and percentage of college graduates, as well as median household increases.<sup>189</sup> Among the cities studied, D.C. had the highest percentage of gentrifying neighborhoods.<sup>190</sup> Specifically, Black residential displacement was high, indicating a tract-level pattern of Black population decreases and White population increases.<sup>191</sup> There were 33 tracts in D.C. overall with Black displacement, and the Black population change between 1990 and 2010 was -32 percent, compared to a 21% increase for the White population during this time.<sup>192</sup>

### Location of employers

The location of employers is a contributing factor to disparities in access to opportunity in D.C. and the Region. The vast majority of high-paying, professional jobs are located in Downtown D.C. People who hold these positions commute to work from as far away as Baltimore or Fredericksburg, Virginia. Some outer suburban areas that are far from jobs, such as Prince William County, Virginia and Charles County, Maryland have grown much more racially and ethnically diverse in recent years. While lower-paying service jobs are scattered more evenly across D.C., the Job Proximity Index still indicates that there is a huge deficit of jobs near to peoples' homes in Wards 7 and 8. The same pattern, showing a history of disinvestment in the eastern part of D.C., which tends to be lower income and predominantly Black, can be observed here. Vast disparities in the labor market engagement persist between Black and White residents, and workers' education levels, experience levels, and the proximity to work (compounded by high housing costs) are all culprits. This contributing factor merits close observation going forward as gentrification and displacement and the pushout of low-income people of color to places like Charles County could make the location of employers a more important cause of labor market engagement disparities in the future.

### Location of environmental health hazards

Location of environmental health hazards is a major contributing factor to disparities in access to opportunity. Access to environmentally healthy neighborhoods in D.C. is low for all racial and ethnic groups, and there are several significant environmental issues within D.C. that affect vulnerable populations. Both the Anacostia and the Potomac Rivers are heavily polluted, and the D.C. region has consistently ranked in the Top Ten Worst Cities in terms of air pollution.

D.C.'s waste and where it gets processed has long been correlated with segregation. D.C.'s Department of Public Works manages two transfer stations in Fort Totten and Benning Road,

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<sup>189</sup> Richardson, J., Mitchell, B., Franco, J. (March 2019) "Shifting Neighborhoods: Gentrification and Cultural Displacement in American Cities." The National Community Reinvestment Coalition. <https://ncrc.org/download/56067/>, pg. 26.

<sup>190</sup> Richardson, et. al, pg. 31.

<sup>191</sup> Richardson, et. al, pg. 21.

<sup>192</sup> Richardson, et. al, pg. 26.

communities that are both predominantly Black.<sup>193</sup> These stations are large enough to handle the District's needs, but a number of privately owned waste transfer stations began popping up in the absence of regulation several years ago. Of the fifteen that opened, many have since been closed down, but three remain in the adjacent majority-Black neighborhoods of Brentwood and Langdon.<sup>194</sup> Not only do these waste transfer sites inflict odors and diesel exhaust into the communities, but they also are a source of airborne mercury pollution from sources such as florescent bulbs.<sup>195</sup>

In Southwest D.C., where the soil remains contaminated from multiple power generation projects over the years, new development projects such as Audi Field have dredged up toxic chemicals—including diesel fumes, bisphenol A, lead, and arsenic—that add to the already poor air quality.<sup>196</sup> Specifically in the neighborhood of Buzzard Point, children under the age of 18 have a 14-15 percent prevalence of asthma, a rate that is 1.5 times the rest of Southwest D.C. Additionally, 10 percent of adults have chronic obstructive pulmonary disease, compared to a 1 percent rate in surrounding neighborhoods. Adult residents have a 24 percent chance of having bad health for longer than two weeks, compared to a 7 percent chance in surrounding neighborhoods.<sup>197</sup> The 2016 Community Health and Safety Study, completed by the D.C. Health Department, found that chronic lower respiratory diseases are one of the top five causes of death in the 20024 zip code, and that the area also has a higher death rate for lung cancer than the rest of the D.C.<sup>198</sup>

### Location of Proficient Schools and School Assignment Policies

Segregation and access to high performing schools is strongly affected by racial and economic residential segregation in D.C. D.C.'s system of district-wide choice, the lottery, the expanded charter sector, and the STAR rating system, are all intended, in part, to counteract the educational impacts of segregation. As a result, low income students of color in D.C. have access to a wide range of schools, and many are able to access their first choice schools. However, the lottery and school choice system are only a partial solution to the problem of unequal access to the higher performing schools in D.C.

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<sup>193</sup> Ewall, M. "DC's Waste and Environmental Racism." Energy Justice Network.

<http://www.energyjustice.net/content/dcs-waste-and-environmental-racism>

<sup>194</sup> Ewall.

<sup>195</sup> Ewall.

<sup>196</sup> Lockwood, D. (May 2017). "'Clean This Place, Don't Displace': Activists Battle for Environmental Justice in Washington, DC." Truthout. <https://truthout.org/articles/clean-this-place-don-t-displace-activists-battle-for-environmental-justice-in-washington-dc/>

<sup>197</sup> Milloy, C. (May 2018). "New stadium, new restaurants, and more dust and pollution for the poorest residents of Southwest Washington." The Washington Post. [https://www.washingtonpost.com/local/southwest-dc-is-getting-a-new-stadium-new-restaurants-and-more-dust-and-pollution-for-its-poorest-residents/2018/05/05/19f4a0a4-4fb4-11e8-84a0-458a1aa9ac0a\\_story.html?noredirect=on&utm\\_term=.70f8fbd1b152](https://www.washingtonpost.com/local/southwest-dc-is-getting-a-new-stadium-new-restaurants-and-more-dust-and-pollution-for-its-poorest-residents/2018/05/05/19f4a0a4-4fb4-11e8-84a0-458a1aa9ac0a_story.html?noredirect=on&utm_term=.70f8fbd1b152)

<sup>198</sup> Hamilton, R. (March 2018). "D.C. development is leaving historic Black communities in the dust." The Washington Post. [https://www.washingtonpost.com/opinions/dc-development-is-leaving-historic-black-communities-in-the-dust/2018/03/09/e2b0fbb2-2211-11e8-94da-ebf9d112159c\\_story.html?noredirect=on&utm\\_term=.a9b4c20c9913](https://www.washingtonpost.com/opinions/dc-development-is-leaving-historic-black-communities-in-the-dust/2018/03/09/e2b0fbb2-2211-11e8-94da-ebf9d112159c_story.html?noredirect=on&utm_term=.a9b4c20c9913)

## Overview:

Since the passage of the D.C. School Reform Act of 1995, two systems of public schools have served students in the District of Columbia: District of Columbia Public Schools (“DCPS”) and District of Columbia Public Charter Schools (“PCS”). As of SY 2018-2019, there are 116 traditional public schools in DCPS, and 123 public charter schools in PCS operated by 66 nonprofits.<sup>199</sup> There are 49,056 students in traditional public schools and 43,960 students in public charter schools;<sup>200</sup> these numbers equate to roughly 53% attending traditional public and 47% attending public charters.<sup>201</sup> Of the total number of students enrolled across both DCPS and PCS, 67.7% are Black, 18.4% are Hispanic, 10.2% are white.<sup>202</sup> 80% of enrolled students are economically disadvantaged.<sup>203</sup>

Most students that are low-income in D.C. are also students of color, going to school with other students of color.<sup>204</sup> 71% of Black students in both sectors of public schools attended schools in 2013 that had virtually no white peers.<sup>205</sup> According to D.C. public education scholar Chelsea Coffin, “Black students are by far the most segregated group in the city and the region by race and poverty.”<sup>206</sup> In D.C., charter schools have an even higher level of racial separation than the already historically-segregated traditional public schools. 80% of charter schools were intensely segregated with over 90% students of color in 2012, versus 75% of traditional public schools.<sup>207</sup> Over two-in-three charter schools enrolled over 99% students of color.<sup>208</sup>

As of SY 2017-18, 26% were enrolled in their by-right DCPS school, 27% were enrolled in a DCPS school other than their by-right school, and 47% were enrolled in a public charter school.<sup>209</sup> DCPS schools in Wards 1, 3, and 4 (all of which are among the wealthiest wards in the city) had the highest in-boundary student enrollment growth from 2013 to 2017, while in-boundary enrollment at DCPS schools in Wards 5, 7, and 8 (the three least wealthy wards in the city) decreased.<sup>210</sup> Even within the choice-rich landscape of DC, perceptions of local school quality continue to influence families’ housing decisions.

### 1. Location of publicly assisted housing limits access to proficient schools

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<sup>199</sup> DC PCSB. “DC Public Charter Schools.” *District of Columbia Public Charter School Board*, [www.dcpsb.org/](http://www.dcpsb.org/).

<sup>200</sup> <https://osse.dc.gov/page/2018-19-school-year-enrollment-audit-report-and-data>

<sup>201</sup> DCPCSB. “More Students Attend Public Schools: 2019 Audited Enrollment Analysis.” *More Students Attend Public Schools: 2019 Audited Enrollment Analysis* | *District of Columbia Public Charter School Board*, 2019, [www.dcpsb.org/blog/more-students-attend-public-schools-2019-audited-enrollment-analysis](http://www.dcpsb.org/blog/more-students-attend-public-schools-2019-audited-enrollment-analysis).

<sup>202</sup> Asian and Multiracial students constitute the remaining percentage. OSSE, et al. *District of Columbia PK3-12 2016-2017 Equity Report*. [osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/2017\\_Equity\\_Report\\_Citywide\\_District%20of%20Columbia%20PK3-12.pdf](http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/2017_Equity_Report_Citywide_District%20of%20Columbia%20PK3-12.pdf).

<sup>203</sup> OSSE, et al, *ibid*.

<sup>204</sup> Orfield, Gary, and Jongyeon Ee. “Our Segregated Capital: An Increasingly Diverse City with Racially Polarized Schools.” *The Civil Rights Project*, UCLA, 2017, [www.civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/our-segregated-capital-an-increasingly-diverse-city-with-racially-polarized-schools/POSTVERSION\\_DC\\_020117.pdf](http://www.civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/our-segregated-capital-an-increasingly-diverse-city-with-racially-polarized-schools/POSTVERSION_DC_020117.pdf).

<sup>205</sup> Orfield & Ee, *ibid*.

<sup>206</sup> Coffin, Chelsea. *Landscape of Diversity in D.C. Public Schools*. DC Policy Center, 2018, [www.dcpolicycenter.org/publications/landscape-of-diversity-in-dc-public-schools/](http://www.dcpolicycenter.org/publications/landscape-of-diversity-in-dc-public-schools/).

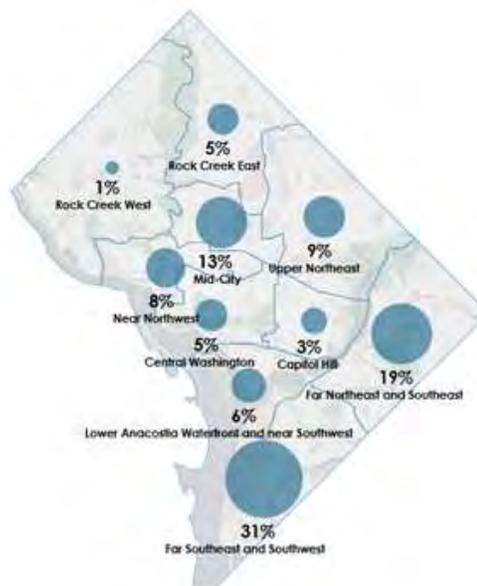
<sup>207</sup> Coffin, *ibid*.

<sup>208</sup> Orfield & Ee, *supra*.

<sup>209</sup> Office of the Deputy Mayor of Education (DME). “DC Public Education Master Facilities Plan (MFP),” 2019, [https://dme.dc.gov/sites/default/files/dc/sites/dme/publication/attachments/DC\\_MFP\\_2019\\_Feb%202021\\_Final\\_compressed\\_0.pdf](https://dme.dc.gov/sites/default/files/dc/sites/dme/publication/attachments/DC_MFP_2019_Feb%202021_Final_compressed_0.pdf)

<sup>210</sup> Office of the Deputy Mayor of Education (DME), *ibid*.

For low-income families, exclusion from high performing schools is most often accomplished through a combination of housing and school policy – and especially in the decisions local governments make about where to locate affordable housing. In D.C., the distribution of both government subsidized and deed restricted housing is inversely proportional to the location of the highest performing and lowest poverty school zones, and the geographic as-of-right preference for in-zone students that dominates school choice in most DCPS elementary schools helps to lock in opportunity for more privileged students.



*Distribution of income-restricted affordable housing by Comprehensive Plan Area, 2018 (DC Office of Planning)*

The Mayor’s May 2019 Housing Initiative order<sup>211</sup> and the city’s plan to adopt a “fair share” housing plan for each ward in the city<sup>212</sup> is a promising step toward improving access to proficient schools for low income D.C. families, but without a focus on deeply income targeted affordable housing with large bedroom sizes in the highest performing elementary school zones, the plan is unlikely to achieve greater equity in school access. Likewise, without a specific targeted preference for families living in Ward 7 and 8, new affordable housing options in the western neighborhoods of the city is unlikely to make a dent in D.C.’s high rates of school segregation.

**2. Although increasing white middle class enrollment has the potential to increase integration, gentrification is limiting access for low-income Black students**

In D.C.’s gentrifying neighborhoods, displacement is rampant. The low-income population living in D.C. neighborhoods that are experiencing economic expansion fell by 28 percent from 2000 to 2016.<sup>213</sup> The Black population in these areas fell by 23 percent, while the white population grew by 202 percent.<sup>214</sup> As the city continues to gentrify, traditional DCPS schools have attracted

<sup>211</sup> United States, Congress, Office of the Mayor, and Muriel Bowser. “Mayor’s Order 2019-036: HOUSING INITIATIVE .” *Mayor’s Order 2019-036: HOUSING INITIATIVE* , 10 May 2019. [gwwash.org/files/2019-036\\_Housing\\_Initiative\\_\(5.10\).pdf](http://gwwash.org/files/2019-036_Housing_Initiative_(5.10).pdf).

<sup>212</sup> Alpert, David. “DC Will Set Targets for Housing, Including Affordable Housing, in All 8 Wards by This Fall.” *Greater Greater Washington*, May 2019, [gwwash.org/view/72070/mayor-bowser-targets-housing-8-wards-fall-affordable](http://gwwash.org/view/72070/mayor-bowser-targets-housing-8-wards-fall-affordable).

<sup>213</sup> Institute on Metropolitan Opportunity. *American Neighborhood Change in the 21st Century*. Apr. 2019, [www.law.umn.edu/sites/law.umn.edu/files/metro-files/american\\_neighborhood\\_change\\_in\\_the\\_21st\\_century\\_-\\_executive\\_summary\\_-\\_4-2-2019.pdf](http://www.law.umn.edu/sites/law.umn.edu/files/metro-files/american_neighborhood_change_in_the_21st_century_-_executive_summary_-_4-2-2019.pdf).

<sup>214</sup>Institute on Metropolitan Opportunity, *ibid.*

more white families in recent years.<sup>215</sup> Compared with charters, DCPS has “about three times the share of white students and about twice the share of Asian students.”<sup>216</sup> While white student enrollment is rising in DCPS's early grades, Black students have been shifting from traditional DCPS schools to charters.<sup>217</sup> The increasing concentration of Black students in charters may be because charter schools are “often located in neighborhoods with a large share of students of color and in neighborhoods where traditional public options may be perceived as less desirable by parents.”<sup>218</sup>

When in-zone white families flock to select low-poverty DCPS elementary schools with relatively high concentrations of white students, these schools become more “exclusive.” Schools in affluent and gentrifying neighborhoods that offer by-right admission<sup>219</sup> for local families and extend a proximity preference to fill any remaining open seats perpetuate neighborhood and school segregation by incentivizing parents to base their housing decisions on proximity to the perceived highest-quality schools.

### **3. Current school assignment boundaries and feeder patterns do not advance racial and socio-economic integration**

In D.C, the combination of geographic preferences (by-right admission and proximity preferences) for some elementary schools, and current school assignment boundary lines that track segregated housing patterns, exacerbate residential and school segregation. In areas where school attendance is defined or heavily influenced by neighborhood, “decisions about housing cost and density, the location of multifamily rental housing, and the distribution of government-assisted housing subsidies will impact patterns of school enrollment based on race and income.”<sup>220</sup> Higher-income families with children tend to cluster and bid up the price of housing in the “highest-performing” (and lowest-poverty) districts.<sup>221</sup> Affluent families in such neighborhoods use the geographic preference to enroll their children at the PK/Kindergarten level, thus securing their children’s place into an exclusive feeder pattern that extends through the end of high school. Students in Wards 7 & 8 have lower access to above-average proficiency schools than their west-of-the-river peers, which means families must choose between low-performing neighborhood schools, nearby charter schools, or long travel times (with no elementary school student transportation) to schools in Wards 1-6 (contingent upon winning seats in the lottery).

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<sup>215</sup> Lei, Serena. *Our Changing City: Schools*. Urban Institute, 2014, apps.urban.org/features/OurChangingCity/schools/index.html#index.

<sup>216</sup> Lei, Serena, *ibid*.

<sup>217</sup> Lei, Serena, *ibid*.

<sup>218</sup> Blagg, Kristin, et al. “The Road to School: How Far Students Travel to School in the Choice-Rich Cities of Denver, Detroit, New Orleans, New York City, and Washington, DC.” *Urban Institute*, Mar. 2018, [www.urban.org/research/publication/road-school-how-far-students-travel-school-choice-rich-cities-denver-detroit-new-orleans-new-york-city-and-washington-dc/view/full\\_report](http://www.urban.org/research/publication/road-school-how-far-students-travel-school-choice-rich-cities-denver-detroit-new-orleans-new-york-city-and-washington-dc/view/full_report).

<sup>219</sup> DCPS has in-boundary schools (also called neighborhood schools), which are “a DCPS school that a student has a right to attend in Kindergarten through grade 12 based on where the student lives. The school district has attendance zones (boundary lines), and each student is assigned to an in-boundary school based on those lines.”

My School DC, “Key Terms.” *Key Terms | My School DC*, [www.myschooldc.org/faq/key-terms#faq-In-boundary-school](http://www.myschooldc.org/faq/key-terms#faq-In-boundary-school).

<sup>220</sup> Tegeler, Philip, and Michael Hilton. *Disrupting the Reciprocal Relationship Between Housing and School Segregation*. A Shared Future: Fostering Communities of Inclusion in an Era of Inequality, 2017,

[www.jchs.harvard.edu/sites/default/files/a\\_shared\\_future\\_disrupting\\_reciprocal\\_relationship.pdf](http://www.jchs.harvard.edu/sites/default/files/a_shared_future_disrupting_reciprocal_relationship.pdf).

<sup>221</sup> Tegeler, Philip, and Michael Hilton, *ibid*.

An impactful, though politically challenging solution would be to de-emphasize by-right neighborhood admission to DCPS elementary schools (and other geographic preferences in the lottery system), including the possibility of a low income set-aside for incoming pre-K students. Another policy solution would be to explore the possibility of creating non-contiguous school zones or pairing of elementary schools.

#### **4. The lottery is not providing equal access to the most proficient schools for low-income students**

The District's school choice and lottery system (MySchoolDC) is designed to put all students on a level playing field, with access to schools across the entire city, not only the local schools within their geographic zone. The lottery system is accompanied by a robust system of outreach and parent information, including events, grassroots outreach, community partnerships, advertising and in-person support for families in low-income and language minority areas.<sup>222</sup> The system has been successful in expanding access to a wider range of schools for low income students, and many students are able to attend their first choice school. However, for a variety of reasons (including student transportation – see section 5 below), access to the highest performing (top 50%) of schools remains unequally distributed.

The D.C. School Lottery (“My School DC”) is a single online application that families can use to apply to: (1) Participating public charter schools (PK3–12); (2) DCPS schools outside of their boundary or feeder pattern for any grade, including DCPS citywide schools; (3) All DCPS PK3 and PK4 programs, including programs at in-boundary schools<sup>223</sup>; and (4) DCPS selective high schools or programs. Families rank up to twelve school choices. An algorithm sorts the applicants creating matches and waitlists. When the algorithm “compares two students who have applied to the same school, the decision is based on two criteria: the students’ randomly assigned lottery number, and the students’ preferences at that school”<sup>224</sup> (e.g., geographic preference, sibling preference).<sup>225</sup>

In 2019, 65% of applicants received an initial school match through the lottery,<sup>226</sup> and an additional 19% achieve access to schools of their choice through waitlist admissions or post-lottery applications.<sup>227</sup> Students living in the wealthier wards in the northwest have very high access to above-average proficiency schools in their neighborhood, which may explain their

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<sup>222</sup> FY 18 OSSE Performance Oversight Questions, Q73.

<sup>223</sup> “An in-boundary school (also called a neighborhood school) is a DCPS school that a student has a right to attend in Kindergarten through grade 12 based on where the student lives. The school district has attendance zones (boundary lines), and each student is assigned to an in-boundary school based on those lines.”

My School DC, *supra*.

<sup>224</sup> Peretti, Catherine, and Aaron Parrott. *Giving At-Risk Students Preference in a Unified Lottery for Public Schools*. Apr. 2018, [www.myschooldc.org/sites/default/files/dc/sites/myschooldc/page/MSDC%20At-Risk%20Preference%20in%20a%20Unified%20Lottery%204.26.2018\\_Final.pdf](http://www.myschooldc.org/sites/default/files/dc/sites/myschooldc/page/MSDC%20At-Risk%20Preference%20in%20a%20Unified%20Lottery%204.26.2018_Final.pdf).

<sup>225</sup> Students and families do NOT need to submit a lottery application if their child will: (1) Attend a right-to-attend\*\* DCPS school for grades K–12; or (2) Remain in his or her current school. \*\*A student’s right-to-attend school is a DCPS school where that student can enroll at any time in Kindergarten through grade 12. Students do not apply to their right-to-attend schools. There are two types of right-to-attend schools for K–12 students: in-boundary schools and feeder-pattern schools.

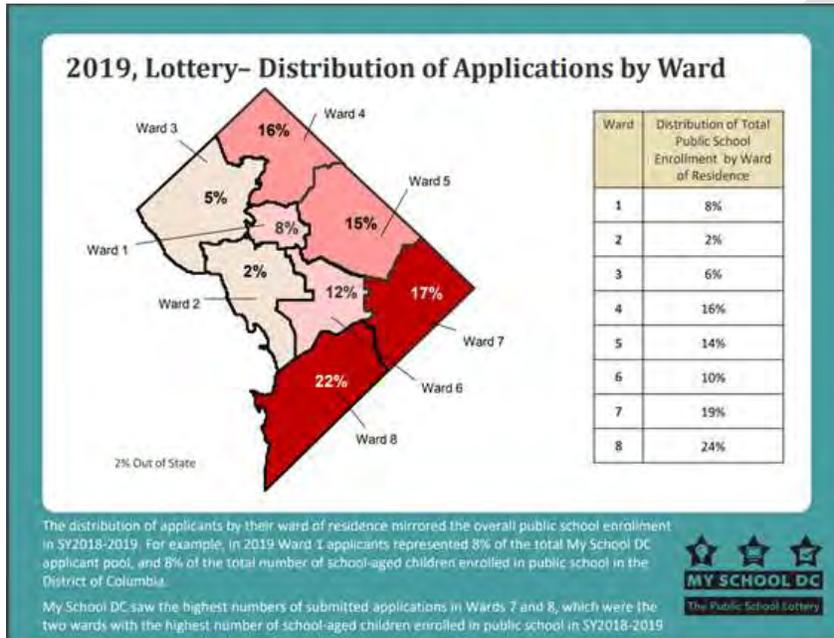
My School DC, *supra*.

<sup>226</sup> My School DC, *supra*.

<sup>227</sup> Information supplied by OSSE.

relatively low lottery participation.<sup>228</sup> Meanwhile, students living across the Anacostia River have fewer proficient school options in their home wards, and are more dependent on the lottery to access a school of their choice.

The lottery’s potential as a tool to integrate schools and expand options for low-income and students of color is limited by the fact that elementary schools are able to impose by-right



geographic admission for in-zone students, advantaging families who can afford real estate in hot school zones.

Take for example the lottery scenario analyzed by Catherine Peretti and Aaron Parrott: “Four of the highest performing DCPS elementary schools that serve the fewest at-risk students offered 258 seats in the unified lottery. Of those, only 28 seats were awarded to out-of-boundary students... 5 of those 28 had a sibling already at the school, so only

23 lottery seats across four schools were truly awarded on the ‘open market’ to students living outside of the boundary.”<sup>229</sup>

One solution to promote equity would be an at-risk preference in the lottery. According to one analysis, the potential impact of at-risk lottery preferences on at-risk students gaining a match in the lottery would be positive.<sup>230</sup> However, “these matches will have little impact on the socioeconomic diversity of the qualifying schools because the new number of matches is relatively small in comparison to total enrollment.”<sup>231</sup> Using the unified lottery as a tool for redistributing students among schools is limited by the number of seats offered in the lottery relative to total school populations (including students in the as-of-right elementary school attendance zone). An alternative would be to establish a set-aside of at-risk seats for incoming students at the Pre-K/K level.<sup>232</sup>

## 5. Lack of student transportation services limit low-income students access to proficient schools

<sup>228</sup> There is also a long-established private school sector in DC that attracts many wealthy families, which may also explain the relatively low lottery participation rates.

<sup>229</sup> Peretti, Catherine, and Aaron Parrott, supra.

<sup>230</sup> That is, more at-risk students gain matches when all varieties of the at-risk preference are applied to the qualifying schools.

<sup>231</sup> Peretti, Catherine, and Aaron Parrott, supra.

<sup>232</sup> Denver Public Schools has successfully implemented a version of this approach by giving a preference in their lottery at 20 low-poverty schools for low-income students while also opening a comprehensive high school that reserves a third of available seats for students residing in high-poverty neighborhoods. Coffin, Chelsea, supra.

Through the Kids Ride Free program, all D.C. students have free bus and metrorail access, but there is no central school bus system. Lack of student transportation primarily affects children at the elementary school level, who are often considered too young to ride public transportation alone. A safe, consistent, school-organized student transportation system would support low-income parents to send their kids to schools in high-opportunity neighborhood schools outside of their neighborhoods, if they so choose. The lack of school-supported transportation limits the school choices of Black and low-income elementary school students in neighborhoods with lower access to proficient schools. In D.C., the cumulative effect of this transportation policy enhances the effects of housing segregation, especially for those who are geographically separated in Wards 7 & 8, far from the city's top schools.

#### **6. Admissions criteria for selective high schools diminishes access**

Despite the fact that 23% of all public school students live in Ward 8, there is no selective high school there.<sup>233</sup> All eight selective high schools require some form of interview, four of which require the parent or family to be present.<sup>234</sup> Taking time off of work to attend a family interview may be a barrier for low-income wage workers with limited work flexibility, disposable time, and limited transportation options. The changing demographics of some selective schools is also worthy of attention. From SY 2014/2015 - 2016/2017, School Without Walls flipped plurality racial and ethnic group from African American to white; Columbia Heights EC changed plurality from at-risk to not-at-risk.<sup>235</sup> Though the selective high schools meet an important need to provide ambitious curriculum in the DCPS landscape, attention should be paid to the unintentional ways in which the location, admissions process, and changing demographics of these schools may signal unequal access for D.C.'s most vulnerable students.

#### **7. Current school rating systems exacerbate segregation and diminish access to proficient schools**

D.C.'s "STAR" system, designed to provide transparency and accountability, may also have the effect of stigmatizing higher poverty schools. Schools with more affluent student bodies tend to produce higher test scores, even in a system like D.C., where year-to-year progress is also incorporated into the school ratings. Professor Jack Schneider (an advocate of holistic school measures) explains the general trend, that "[p]erceived as 'good,' [highly-ranked schools] become the objects of desire for well-resourced and quality-conscious parents," while lower ranked schools are avoided.<sup>236</sup> Thus, parents with the ability to buy into highly rated school

<sup>233</sup> Although 19% of all public students live in Ward 7, there is only one selective school in the ward.

<sup>234</sup> MySchoolDC.org. *DCPS SELECTIVE HIGH SCHOOLS AND PROGRAMS – APPLICATION REQUIREMENTS AND ADMISSIONS PROCESS SY19-20*. DCPS, [www.myschooldc.org/sites/default/files/dc/sites/myschooldc/page/SY19-20%20Selective%20High%20School%20Requirements%20%28FINAL\\_English%29.pdf](http://www.myschooldc.org/sites/default/files/dc/sites/myschooldc/page/SY19-20%20Selective%20High%20School%20Requirements%20%28FINAL_English%29.pdf).

<sup>235</sup> Coffin, Chelsea, *supra*.

<sup>236</sup> Schneider, Jack. "What Makes a Great School?" *Harvard Graduate School of Education*, [www.gse.harvard.edu/news/uk/17/10/what-makes-great-school](http://www.gse.harvard.edu/news/uk/17/10/what-makes-great-school).

zones can choose “good” schools, while parents without that privilege often must make do with the lower-ranked schools. The highest-scoring D.C. school in the STAR system was Benjamin Banneker High in Northwest, which received 99 points; the lowest-scoring school was Anacostia High in Southeast, which received about 3 points.<sup>237</sup> Poor rankings assigned to schools with large numbers of low income children can perpetuate stereotypes of failure that scare away parents and potential teachers with the ability to enrich the institution. School ratings and perceived school quality are only one factor influencing parents’ school choices in D.C. – other factors include distance from home and student diversity.<sup>238</sup>

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<sup>237</sup> In DC, the majority of schools that received poor rankings in the new system are located in Wards 7 & 8. Truong, Debbie. “Star Ratings Show D.C. Schools That Need the Most Help.” *The Washington Post*, WP Company, 7 Dec. 2018, [www.washingtonpost.com/local/education/star-ratings-show-dc-schools-that-need-the-most-help/2018/12/07/761f6d2-fa43-11e8-863c-9e2f864d47e7\\_story.html?utm\\_term=.683c5c81565b](https://www.washingtonpost.com/local/education/star-ratings-show-dc-schools-that-need-the-most-help/2018/12/07/761f6d2-fa43-11e8-863c-9e2f864d47e7_story.html?utm_term=.683c5c81565b).

<sup>238</sup> A 2016 Mathematica study of the DC lottery, funded by the Walton Foundation, provides an in-depth look at the factors influence parent choice in DC schools. <https://www.mathematica-mpr.com/our-publications-and-findings/publications/market-signals-evidence-on-the-determinants-and-consequences-of-school-choice-from-a-citywide>.

## C. Publicly Supported Housing

This section examines locational and occupancy data for publicly supported housing in D.C. and the region, including a number of housing assistance programs (public housing, project-based Section 8 vouchers (PBVs), Other Multifamily Assisted Developments, Housing Choice Vouchers (HCVs), and Low Income Housing Tax Credits (LIHTC). It also assesses local policies and practices in the administration of assisted housing.

### Analysis

#### a. Publicly Supported Housing Demographics

- i. *Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?*
- ii. *Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.*
- iii. *Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

Parts i – iii are answered together, below.

Table 1 provides demographic information on residents living in publicly supported housing in D.C. as well as the broader Washington-Arlington-Alexandria region. Demographic statistics are broken down by race and ethnicity, in addition to four housing types: public housing, project-based Section 8, other multifamily housing, and the housing choice voucher (HCV) program.

**Table 1 Publicly Supported Households by Race/Ethnicity**

<b>Table 1 Publicly Supported Households by Race/Ethnicity</b>								
<b>(District of Columbia, DC CDBG, ESG) Jurisdiction</b>	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Housing Type								
Public Housing	352	5.64%	5,696	91.24%	170	2.72%	22	0.35%
Project-Based Section 8	431	4.57%	8,342	88.41%	315	3.34%	320	3.39%
Other Multifamily	27	5.83%	388	83.80%	44	9.50%	4	0.86%
HCV Program	176	1.53%	10,692	92.83%	456	3.96%	185	1.61%
Total Households	106,235	40.29%	121,905	46.24%	20,195	7.66%	9,375	3.56%
0-30% of AMI	8,380	14.07%	43,830	73.56%	4,850	8.14%	1,410	2.37%
0-50% of AMI	13,180	14.54%	63,985	70.57%	8,275	9.13%	2,270	2.50%
0-80% of AMI	18,040	16.46%	75,100	68.53%	10,205	9.31%	2,910	2.66%
<b>(Washington-Arlington-Alexandria, DC-VA-MD-WV) Region</b>	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Housing Type								
Public Housing	830	9.14%	7,458	82.14%	418	4.60%	363	4.00%
Project-Based Section 8	3,594	17.38%	13,665	66.08%	1,129	5.46%	2,180	10.54%
Other Multifamily	422	25.36%	992	59.62%	81	4.87%	166	9.98%
HCV Program	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Households	1,138,802	54.45%	532,405	25.46%	206,646	9.88%	168,994	8.08%
0-30% of AMI	83,634	34.57%	100,946	41.73%	33,192	13.72%	17,808	7.36%
0-50% of AMI	136,427	30.10%	173,914	38.37%	72,161	15.92%	33,392	7.37%
0-80% of AMI	203,322	33.29%	224,882	36.82%	97,164	15.91%	44,870	7.35%
Note 1: Data Sources: Decennial Census; APSH; CHAS, Note 2: Numbers presented are numbers of households not individuals, Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a> ).								

*District of Columbia*

Across the four types of publicly supported housing, the largest number of white households (431) live in Project-Based Section 8, as do Asian or Pacific Islanders (320). By contrast, across these four types, the largest numbers of Black (10,692) and Hispanic (456) households live in Housing Choice Voucher units.

Furthermore, Black households are consistently overrepresented in publicly supported housing – regardless of housing type – relative to the total population of Black households in the jurisdiction. Although Black households comprise almost half of all households in the jurisdiction (46.24%), Black households’ representation in publicly supported housing nearly doubles across all housing types, occupying between 83.80% and 92.83% of the different types of publicly supported housing. Hispanic households are the only other disproportionately represented racial group (9.50% of other multifamily housing relative to 7.66% of total households), but their overrepresentation is unique to the multifamily housing type and less extreme than that of Black households; all other racial groups across all housing types are underrepresented in publicly supported housing relative to their share of the total households in the jurisdiction.

Black households are also disproportionately represented among income eligible households for publicly supported housing, defined as households with incomes between 0% and 80% of the area median income (AMI). While Black households comprise 46.24% of total households in the jurisdiction, they account for 68.53% of households eligible for publicly supported housing. Yet relative to their proportion of income-eligible households, Black households are also overrepresented among households actually residing in a form of publicly supported housing; Black households occupy between 83.80% and 92.83% of publicly supported housing. In contrast, whereas White households encompass 40.29% of total households in the jurisdiction, only 16.46% of White households are income-eligible for publicly supported housing and an even smaller proportion of White households actually reside in a form of publicly supported housing (occupying between 1.53% and 5.83% of publicly supported housing types). The percentages of income-eligible Hispanic households (9.31%) and Asian/Pacific Islander households (2.66%) are more proportional to their shares of total households in the jurisdiction.

#### *Public Housing*

In D.C., Black households are the predominant residents of public housing; 91.24% of public housing in the jurisdiction is occupied by Black residents. Although Black households also represent a significant proportion of the jurisdiction’s overall population (46.24% of total households), they are the only population overrepresented in public housing. White households only comprise 5.64% of the jurisdiction’s public housing despite accounting for 40.29% of the jurisdiction’s total households. Hispanic and Asian/Pacific Islander households are similarly underrepresented in public housing. Hispanic households occupy 2.72% of public housing relative to 7.66% of total households, while Asian/Pacific Islander households represent only 0.35% of public housing residents relative to 3.56% of total households.

#### *Project-Based Section 8*

Black households are overrepresented in project-based Section 8 housing, occupying 88.41% of the housing type’s residents in D.C. White and Hispanic households are underrepresented, occupying 4.57% and 3.34% of project-based Section 8 housing, respectively. Asian/Pacific Islander households comprise 3.39% of project-based Section 8 housing, which is roughly proportional to Asian/Pacific Islander households’ representation across total households in D.C.

### *Other Multifamily Housing*

In other multifamily housing, Black households are again overrepresented, comprising 83.80% of D.C.'s multifamily housing residents. Hispanic households are also overrepresented in multifamily housing, though to a lesser degree; Hispanic households occupy 9.50% of multifamily housing relative to 7.66% of total households in D.C. White households occupy 5.83% of other multifamily housing, while Asian/Pacific Islander households only occupy 0.86% of multifamily housing in the D.C.

### *Housing Choice Voucher (HCV) Program*

The HCV Program is the most racially disparate housing type. Black households are the only overrepresented population in the HCV Program, occupying 92.83% of the HCV Program despite comprising only 46.24% of total households. White households represent a similar proportion of the District's population (40.29%), yet only occupy 1.53% of HCV Program housing. Hispanic and Asian/Pacific Islander households are similarly underrepresented, occupying 3.96% and 1.61% of HCV Program housing, respectively.

### *Washington-Arlington-Alexandria Region*

Black households are the predominant occupants of publicly supported housing across all housing types, though this racial pattern is less pronounced at the regional level compared to D.C. Nevertheless, considering that Black households comprise approximately one fourth (25.46%) of the total households in the region, Black households are overrepresented in all publicly supported housing types (ranging from 59.62% to 82.14%). While Asian/Pacific Islander households comprise a smaller proportion (8.08%) of total households in the region, they are slightly overrepresented in project-based Section 8 (10.54%) and other multifamily housing (9.98%). White and Hispanic households are consistently underrepresented in all forms of publicly supported housing relative to their shares of total households in the region. This is especially true of White households, who comprise 54.45% of total households in the region but only between 9.14% and 25.36% of households occupying a type of publicly supported housing.

Black and Hispanic households are both disproportionately represented among households with incomes eligible for publicly supported housing. While Black households represent 25.46% of total households in the region, they account for 36.82% of households with incomes eligible for publicly supported housing. Similarly, Hispanic households only represent 9.88% of total households but account for 15.91% of eligible households. Yet relative to their proportion of income-eligible households, only Black households are overrepresented among households actually residing in publicly supported housing (occupying between 59.62% and 82.14% of publicly supported housing types). Hispanic households occupy just 4.60% to 5.46% of publicly supported housing – substantially smaller percentages compared to the fraction of Hispanic households with incomes eligible for publicly supported housing. White households are underrepresented in publicly supported housing eligibility and occupancy alike. Whereas White households encompass 54.45% of total households in the region, only 33.29% of White households are income-eligible for publicly supported housing and even less actually reside in publicly supported housing (occupying between 9.14% and 25.36% of publicly supported housing types). The percentage of income-eligible Asian/Pacific Islander households (7.35%) is roughly proportional to their share of total households in the region (8.08%).

### *Public Housing*

At the regional level, racial disparities are most present in the public housing population. Black households encompass 82.14% of households in public housing relative to just 25.46% of total households in the region. Black households are also the only overrepresented racial group in public housing. White households comprise 9.14% of households in public housing (compared to 54.45% of total households), Hispanic households comprise 4.60% (compared to 9.88% of total households), and Asian/Pacific Islander households comprise 4.00% (compared to 8.08% of total households). The share of public housing households that are black is a bit lower at the regional level than for the District (82.14% in region vs. 91.24% in the District). By contrast, we see slightly higher regional shares of white households (9.14% vs. 5.64%), Hispanics (4.60% vs. 2.72%) and Asian/Pacific Islander households (4.00% vs. 0.35%). While there are non-Hispanic whites, non-Hispanic Asians, and Hispanics using public housing in neighborhoods outside of the District, the dominant trend is that non-Hispanic Blacks make up the vast majority of public housing households, both at the regional and jurisdictional levels. The contributing factors (below) suggest reasons for these observations.

### *Project-Based Section 8*

Black households are also disproportionately represented in project-based Section 8 housing (66.08%). White households are the next most represented racial group in project-based Section 8 housing (17.38%), but they are still underrepresented compared to their share of the overall population of households. Asian/Pacific Islander households occupy 10.54% of project-based Section 8 housing – a marginal overrepresentation relative to their percentage of total households in the region (8.08%), though far less pronounced than that of Black households. Project-based Section 8 is the most common publicly supported housing type for Hispanic households at the regional level (1,129 units); nevertheless, Hispanic households are the least represented in project-based Section 8 housing compared to other racial groups (5.46%) and are still underrepresented relative to their proportion of total households in the region. Once again, the share of project-based Section 8 households that are black is lower at the regional level than for the District (66.08% in region vs. 88.41% in the District). Similarly, we observe higher regional shares of white households (17.38% vs. 4.57%), Hispanics (5.46% vs. 3.34%) and Asian/Pacific Islander households (10.54% vs. 3.39%). Once again, while non-Hispanic whites and non-Hispanic Asians more frequently reside in project-based section 8 in the suburbs than in the District, the predominant trend is that non-Hispanic Blacks make up the majority of project-based section 8 households, both regionally and in the District. See the contributing factors (below) for explanations pertaining to these trends.

### *Other Multifamily Housing*

White households encompass 25.36% of other multifamily housing – less than half their share of total households in the region. Black households are again the most represented racial group in this housing type, comprising 59.62% of households in other multifamily housing. Asian/Pacific Islander households comprise 9.98% of households in other multifamily housing; this is roughly proportional to their percentage of total households in the region (8.08%). Hispanic households are underrepresented in this housing type, occupying 4.87% of other multifamily housing relative to 9.88% of total households in the region. The share of other multifamily households that are black is lower at the regional level than for the District (59.62% in region vs. 83.80% in the

District). Similarly, only 4.87% of other multifamily households are Hispanic regionally, while 9.50% are in the District. By contrast, we observe higher regional shares of white households (25.36% vs. 5.83%) and Asian/Pacific Islander households (9.98% vs. 0.86%). Non-Hispanic whites and non-Hispanic Asians again reside in other multifamily housing in greater numbers in the suburbs than in the District. However, non-Hispanic Blacks make up the majority of other multifamily housing households both regionally and in the District. See the contributing factors (below) for explanations pertaining to these trends.

b. Publicly Supported Housing Location and Occupancy

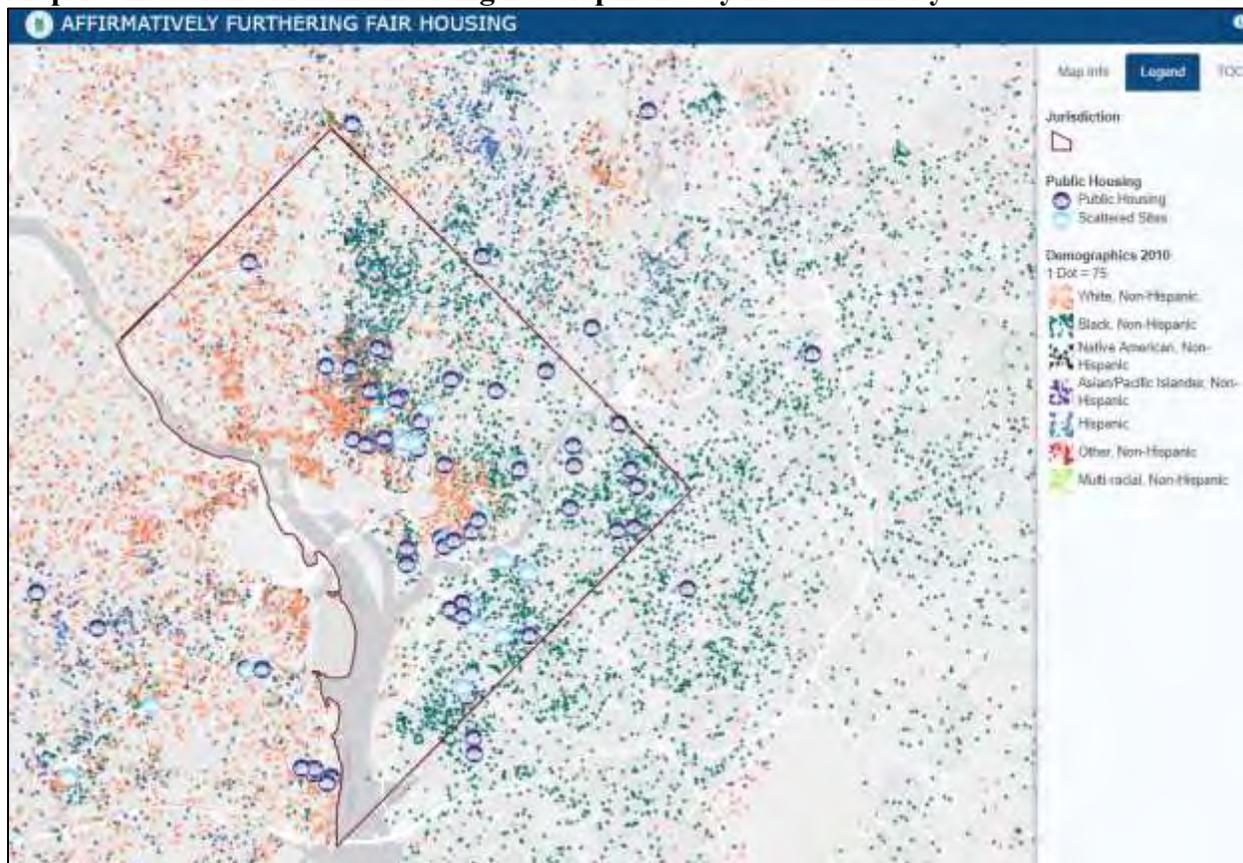
- i. *Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.*
- ii. *Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.*

Parts i and ii are answered together, below.

*Public Housing*

Public housing developments are generally concentrated in the southeast and southwest quadrants of D.C., coinciding with wards 1, 6, 7, and 8, and where the population tends to be Black (see Map 1). This observation confirms the demographic analyses in the previous section that found Black households representing the majority of public housing residents.

**Map 1 – Location of Public Housing Developments by Race/Ethnicity**



Public housing developments where the majority of households are households with children are comprised of predominantly Black households and are also located in predominantly Black neighborhoods<sup>239</sup>. On average, public housing developments in which more than 50% of households are households with children are located in neighborhoods where the racial composition is 87% Black. Of these developments, the average neighborhood poverty rate is 34%.

Also, public housing developments in which at least 50% of households have a senior (age 62 and above) household member are located in neighborhoods where the average share of black residents is 45% and the average share of white residents is 37%. Public housing developments where at least 50% of households have one or more disabled household members are located in neighborhoods that where the average black share is 55% and the average white share is 29%.<sup>240</sup>

### *Project-Based Section 8*

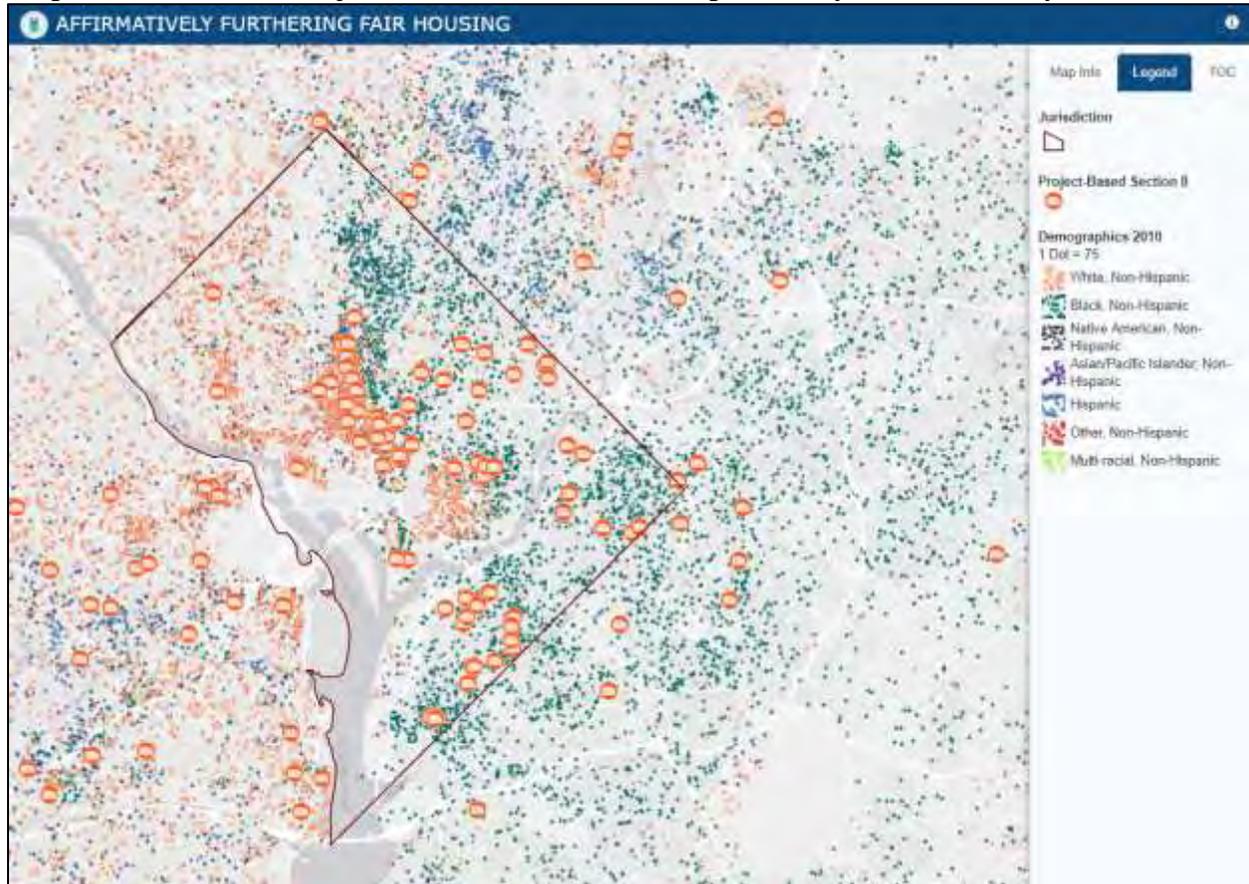
Project-based section 8 developments tend to be located toward the center of D.C. as well as in the southeastern quadrant (see Map 2). The racial composition of the tracts in which project-

<sup>239</sup> Neighborhoods are here defined as Census tracts.

<sup>240</sup> Data as provided by D.C. Housing Authority.

based section 8 developments are located is predominantly Black, though some tracts with section 8 developments have sizeable populations of White households as well.

**Map 2 – Location of Project-Based Section 8 Developments by Race/Ethnicity**

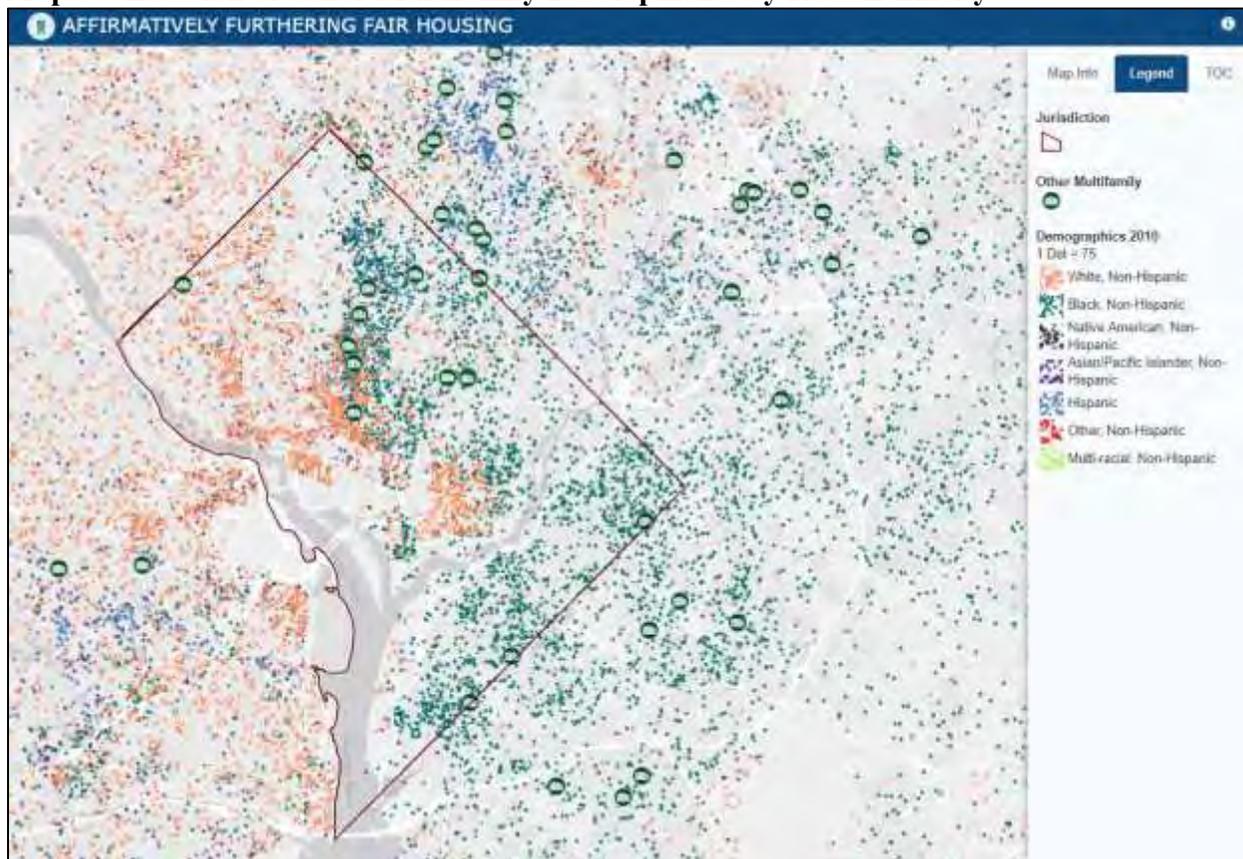


Project-based section 8 developments where the majority of households are households with children are comprised of predominantly Black households and are also located in predominantly Black neighborhoods. On average, project-based section 8 developments in which more than 50% of households are households with children are located in neighborhoods where the racial composition is 90% Black. Of these developments, the neighborhood poverty rate is as high as 57%. On average, project-based section 8 developments where the majority of households are households with children are located in neighborhoods with a poverty rate of 37%.

#### *Other Multifamily Housing*

Other multifamily housing developments are found in the northeast quadrant of D.C. (see map 3). The racial composition of the tracts in which other multifamily housing developments are located is mostly Black, but tracts are less racially disparate than other housing types; White and Hispanic households are also represented in tracts with other multifamily housing developments.

### Map 3 – Location of Other Multifamily Developments by Race/Ethnicity

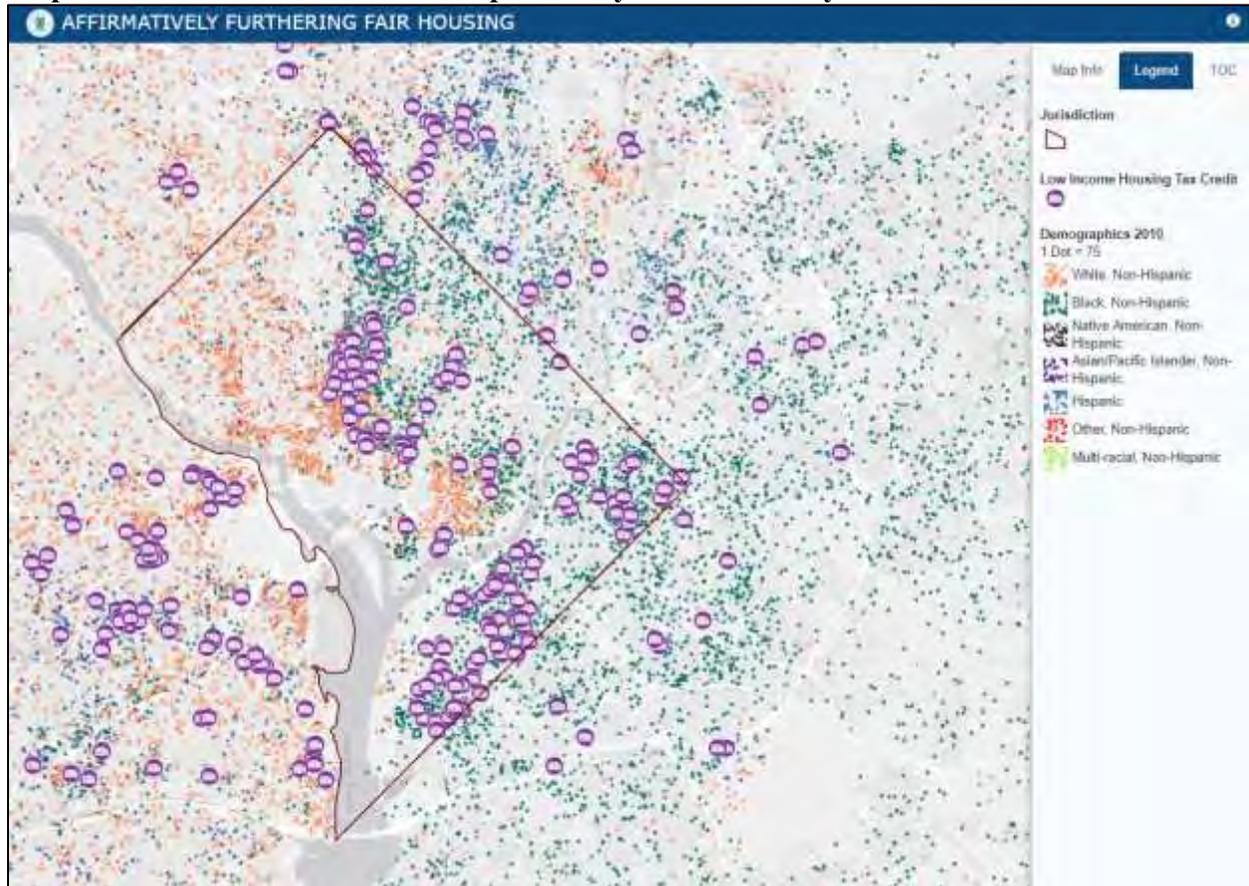


Only two multifamily housing developments serve households with children: Otto B. Berg and Sunflower House. Households with children do not represent the majority of occupants in these developments; 33% and 16% of households, respectively, are households with children. The demographic compositions of both developments are proportional to the demographic compositions of the neighborhoods in which they are located. One development serves 100% Black households, but the neighborhood of the development is 97% Black. The other development primarily serves a mix of White, Black, and Hispanic households, which is also reflected in the racial/ethnic composition of the neighborhood. The developments are located in neighborhoods with poverty rates of 36% and 19%, respectively.

#### *Low Income Housing Tax Credit (LIHTC)*

LIHTC developments are located throughout D.C., with the exception of the northwest area where the population tends to be White (see map 4). On average, LIHTC developments in the District's jurisdiction are located in neighborhoods that are predominantly Black; the next most dominant racial group in neighborhoods with LIHTC developments are White households, followed by Hispanic households and Asian/Pacific Islander households. These demographic patterns hold true for LIHTC developments targeting families with children, as well as households of elderly and disability status.

## Map 4 – Location of LIHTC Developments by Race/Ethnicity



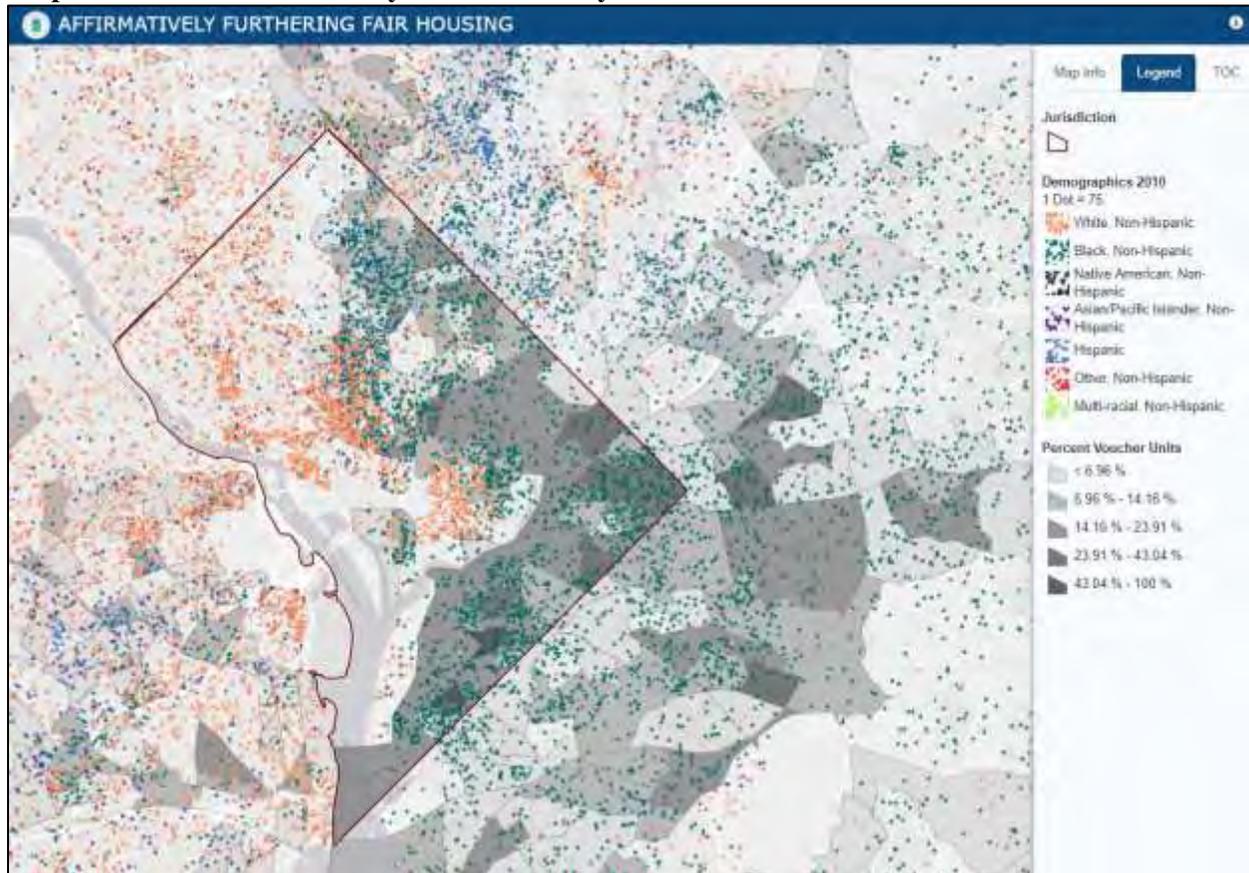
### *Housing Choice Vouchers (HCV)*

Housing Choice Vouchers are located in the northeast and southwest quadrants of D.C., where the population is predominantly Black (see map 5). These areas coincide mostly with wards 5, 7 and 8. This finding also confirms the demographic analyses in the previous section that found Black households represent the majority of HCV residents.

As of the end of Fiscal Year 2018, 35% of D.C. Housing Authority managed tenant-based voucher households in DC had children ages 0-17. Furthermore, 26% were households with senior residents (aged 62 and older) and 46% had at least one disabled household member.<sup>241</sup>

<sup>241</sup> Data as provided by D.C. Housing Authority.

## Map 5– Location of HCVs by Race/Ethnicity



- iii. *How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?*

Table 2 shows the number of publicly supported housing units located in racially/ethnically concentrated areas of poverty (R/ECAPs) and non-R/ECAPs in D.C. These statistics are broken down by race/ethnicity and other protected characteristics (family, elderly, and disability status), as well as the four housing types.

### *Public Housing*

While Black households occupy the majority of publicly supported housing overall, Black households share a similar percentage of public housing occupants in R/ECAP tracts (92.86%) relative to non-R/ECAP tracts (88.73%). White households and Asian/Pacific Islander households in public housing are also similarly distributed between R/ECAP and non-R/ECAP tracts. Hispanic households, as well as those of elderly and disability status, are more likely to reside in public housing located in non-R/ECAP tracts. In contrast, families with children are more likely to live in public housing located in R/ECAP tracts. Families with children occupy

40.53% of public housing in R/ECAP tracts, nearly a three-fold increase from the percentage of families with children occupying public housing in non-R/ECAP tracts (14.65%).

### *Project-Based Section 8*

Similar to public housing, families with children occupy 52.32% of project-based Section 8 in R/ECAP tracts, more than twice the proportion of families with children occupying project-based Section 8 in non-R/ECAP tracts (24.27%). Black households are again the most represented group in project-based Section 8 housing, but both Black households and households with disability status occupy similar proportions in project-based Section 8 housing located in R/ECAP tracts relative to non-R/ECAP tracts. White and Asian/Pacific Islander households join Hispanic households and households with elderly status occupying more project-based Section 8 housing located in non-R/ECAP tracts compared to R/ECAP tracts.

### *Other Multifamily Housing*

Households with elderly status occupy a significantly higher proportion of other multifamily housing units in R/ECAP tracts (84.19%) relative to non-R/ECAP tracts (58.82%). Black households occupy similarly high percentages of multifamily units in R/ECAP tracts (94.68%) and non-R/ECAP tracts (82.69%). Likewise, Hispanic households, families with children, and households with disability status also occupy similar percentages of multifamily units in R/ECAP tracts relative to non-R/ECAP tracts. White and Asian/Pacific Islander households occupy more multifamily housing located in non-R/ECAP tracts compared to R/ECAP tracts.

### *Housing Choice Voucher (HCV) Program*

Despite encompassing a small portion of HCV Program residents overall, Asian/Pacific Islander households in HCV Program housing are substantially more likely to live in R/ECAP tracts relative to non-R/ECAP tracts. Asian/Pacific Islander households occupy 2.40% of HCV Program housing in R/ECAP tracts but only 0.53% of HCV Program housing in non-R/ECAP tracts. Black households are the most represented group in the HCV Program, but occupy similar percentages of HCV Program housing located in R/ECAP tracts and non-R/ECAP tracts – along with families with children and households with elderly and disability status. Lastly, White and Hispanic households occupy more HCV program housing located in non-R/ECAP tracts compared to R/ECAP tracts.

- iv. *(A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.*

Table 3 shows the racial/ethnic composition of developments for each housing type (public housing, project-based section 8, and other multifamily housing) in the District of Columbia.

### *Public Housing*

Public housing developments do not reveal significant inter-development racial disparities; Black households occupy the majority of units for every public housing development included in the HUD provided data. White households are the next most likely racial group to occupy public housing units but are still far less represented than Black households in public housing across all public housing developments in D.C.

### *Project-Based Section 8*

Black households occupy the vast majority of units in project-based section 8 developments. Only five of the 78 project-based section 8 developments included in the HUD provided data are *not* majority-Black developments. Of those five developments, three are majority-Hispanic (Glenn Arms, Capitol Manor, and Covington Family Association) while the remaining two are majority-White (St. Mary's Court and Friendship Terrace). However, with the exception of St. Mary's Court, the remaining four of these developments are smaller in unit size compared to the other project-based section 8 developments included in the HUD provided data. Consequently, variation in the racial composition at these developments may be exaggerated by the smaller unit size.

### *Other Multifamily Housing*

Most multifamily housing developments are predominantly comprised of Black households. However, the Sunflower House and Kennedy Institute are two multifamily housing developments in which the demographic composition is shared more evenly across racial and ethnic groups. In Sunflower House, the majority of households are Hispanic (42%), followed by 26% Black, 21% White, and 11% Asian. In Kennedy Institute, the majority of households are White (55%), followed by 36% Black and 9% Asian; no households in the Kennedy Institute are Hispanic. It is important to note, however, that multifamily housing developments are smaller in unit size relative to other housing types. Therefore, greater variance in demographic composition may simply be attributed to a difference of a few units that can significantly alter the development's overall composition due to the small unit size.

- v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

### *Public Housing*

Overall, the demographic composition of public housing developments reflects the demographic composition of the tract in which they are located. Public housing developments tend to be

comprised of predominantly Black households and located in predominantly Black census tracts. However, several public housing developments have an overrepresentation of Black households relative to the share of Black households in the tract. For example, 94% of public housing units in Park-Morton Apartments are occupied by Black households, yet only 58% of the population of the tract in which the housing is located is Black. Other developments with similar overrepresentations of Black households include Carroll Apartments, Horizon House, Kentucky Courts, and Harvard Towers.

### *Project-Based Section 8*

Similar to public housing, most project-based section 8 developments are mostly occupied by Black households which reflects their location in predominantly Black census tracts. One development, Savannah Ridge (Woodberry Village), is located in a tract in which 98% of residents are Black but Black households only occupy 60% of the development's units; this development shows the greatest difference in racial composition relative to the tract in which it is located in terms of underrepresentation of Black households. By contrast, several project-based section 8 developments have an overrepresentation of Black households relative to the share of Black households in the tract. For example, Black households occupy 100% of units at Horizon House despite being located in a tract where only 19% of households are Black.

### *Other Multifamily Housing*

The demographics of other multifamily housing developments are mostly reflective of the demographics of the tracts in which they are located. Capitol Commons is a development at which Black households are significantly overrepresented; Black households occupy 97% of the development's units, despite only representing 55% of the tract population. Similarly, Black households occupy 36% of units at the Kennedy Institute, but just 4% of the tract population.

#### c. Disparities in Access to Opportunity

- i. *Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.*

### *School Proficiency*

Tracts in the northwest area of D.C. score the highest on the school proficiency index. However, most of the jurisdiction's publicly supported housing developments are located in the eastern half of the jurisdiction where tracts score lower on the school proficiency index.

### *Job Proximity*

Rankings on the job proximity index vary widely throughout D.C. Areas in the central and northeast quadrants of D.C. are ranked high on the index where many publicly supported housing developments are clustered. Yet areas further south and east in D.C. score lower on the index in areas where many publicly supported housing developments are also located.

### *Labor Market Engagement*

The labor market index is starkly divided between the northwest and remaining areas of the D.C. Areas that rank highest on the labor market index are located almost exclusively in the northwest quadrant of D.C. where almost no publicly supported housing developments are located. The remaining areas of D.C. consistently rank lower on the labor market index where publicly supported housing is also located.

### *Transit Trips and Low Transportation Costs*

The entirety of D.C. consistently ranks high on the transit trips and low transportation cost indices, including in areas where publicly supported housing is located. Thus, there does not seem to be significant differences in access to transportation opportunity across the jurisdiction.

### *Low Poverty*

Tracts ranked highly on the low poverty index are predominantly concentrated in the northwest quadrant of D.C.; however, few publicly supported housing developments are located in these areas. By contrast, most publicly supported housing developments are located in tracts ranked lower on the low poverty index, suggesting that publicly supported housing is often located in economically disadvantaged areas. This pattern comports with earlier discussions of the location of publicly supported housing relative to the poverty rate of the tract in which the housing is situated.

### *Environmental Health*

Tracts throughout D.C. rank consistently low on the environmental health index, including areas in which publicly supported housing is located. Thus, there are not significant differences in environmental health for residents of publicly supported housing relative to D.C. overall.

## **Additional Information**

The District of Columbia Housing Authority is designated as a Moving to Work (MTW) agency, meaning that it may receive regulatory waivers from HUD (as approved in its annual MTW Plan) in order to increase housing choice, reduce costs, or promote self-sufficiency among program participants.<sup>242</sup> DCHA has held MTW status since 2003. The agency proposes initiatives as part of its annual MTW plan process. DCHA has implemented a number of

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<sup>242</sup> For more information, visit <http://www.dchousing.org/mtw2/>

initiatives to promote self-sufficiency, and in some cases also increase program efficiencies; it has also made a number of changes to the administration of its Project-Based Voucher program, discussed in detail in its MTW Plan.

DCHA is using its MTW funding flexibility to address basic capital and service needs for its buildings and program participants: given lack of external resources, it is currently using voucher funding for “critical agency functions in support of DCHA’s mission (e.g. public safety initiatives, resident services, and the continued modernization of DCHA’s public housing).”<sup>243</sup> It has also undertaken a blended funding initiative, in which it uses both public housing and PBV funding to support capital improvements and redevelopment.<sup>244</sup>

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The agency proposes initiatives as part of its annual MTW plan process. The following are examples of flexibilities DCHA has implemented to promote self-sufficiency, and in some cases also increase program efficiencies, by:

- Increasing the number of families achieving homeownership and renting in the private market through the following initiatives:
  - By modifying the agency’s Homeownership Assistance Program (HOAP) to allow HCV households paying 100% of the contract rent who would otherwise transition off of the voucher program to participate in HOAP;
  - By helping public housing families to escrow a portion of their rent as part of the Public Housing Achieving Your Best Life (AYBL) program as they work to either purchase a home or prepare to rent in the private market.
- Increasing the number of families receiving self-sufficiency services through more focused and expanded service coordination efforts, including:
  - Implementing a new “on the ground” service coordination model with the establishment of Community Navigators in the Office of Resident Services;
  - Providing space in Public Housing developments for service providers to offer on-site self-sufficiency activities;
  - Creating a simplified and more goal oriented incentive structure for the Family Self- Sufficiency program that eliminates the traditional escrow model;
  - Offering enhanced programming at DCHA’s workforce development center (created and funded through MTW single budget flexibility);
- Increasing the number of families experiencing increases in income as a result of rent reform efforts by removing the earned income reporting requirement between scheduled biennial recertifications;

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<sup>243</sup> DCHA MTW Plan 2019 at 18.

<sup>244</sup> DCHA MTW Plan 2019 at 38-39.

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DCHA also utilized its MTW flexibility to make a number of adjustments to its Project-Based Voucher administration:

- Allow a longer HAP contract term—from 10 to 15 years;
- Increase the threshold of units that can be project-based at a single building from 25% to 100%. Increase the percentage of DCHA’s total voucher allocation that can be project-based to greater than 20%, thereby eliminating the cap on the percentage of DCHA’s voucher allocation that can be project-based;
- Allow the owners of PBV units to establish site-based waiting lists;
- Allow applicants on the Public Housing waiting list who are determined to be eligible for accessible units meeting Uniform Federal Accessibility Standards (UFAS) to be eligible for UFAS PBV units that are subsidized through the Partnership Program; and
- Allow Public Housing residents with a right of return to a HOPE VI development to have preference in returning to PBV units that are subsidized through the Partnership Program.

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<sup>246</sup> DCHA MTW Plan 2019 at 18.

<sup>247</sup> DCHA MTW Plan 2019 at 38-39.

<sup>248</sup> DCHA 2019 MTW Plan at 44-45.

**Table 2 - R/ECAP and Non-R/ECAP Demographics  
by Publicly Supported Housing Program Category**

(District of Columbia, DC CDBG, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
<b>Public Housing</b>								
R/ECAP tracts	4,291	5.24%	92.86%	1.79%	0.11%	40.53%	26.01%	22.38%
Non-R/ECAP tracts	2,679	6.25%	88.73%	4.17%	0.74%	14.65%	47.18%	44.38%
<b>Project-based Section 8</b>								
R/ECAP tracts	4,650	2.65%	94.68%	0.58%	2.02%	52.32%	18.21%	9.90%
Non-R/ECAP tracts	4,650	6.74%	81.60%	6.18%	4.95%	24.27%	53.37%	11.90%
<b>Other Multifamily</b>								
R/ECAP tracts	245	2.63%	93.86%	3.07%	0.44%	1.71%	84.19%	20.51%
Non-R/ECAP tracts	166	9.62%	82.69%	5.77%	1.92%	1.60%	58.82%	20.86%
<b>HCV Program</b>								
R/ECAP tracts	6,622	1.03%	94.24%	2.25%	2.40%	39.72%	25.64%	23.14%
Non-R/ECAP tracts	4,906	2.21%	90.90%	6.29%	0.53%	36.78%	23.28%	24.22%
<p>Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household, Note 2: Data Sources: APSH, Note 3: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info/resource/4848/affh-data-documentation">www.hudexchange.info/resource/4848/affh-data-documentation</a>).</p>								

**Table 3 - Demographics of Publicly Supported Housing Developments, by Program Category**

Public Housing								
Development Name	PHA Code	PHA Name	Units	White	Black	Hispanic	Asian	Households with Children
Capital Quarters	DC001	D.C Housing Authority	39	N/a	N/a	N/a	N/a	N/a
Capital Quarter Townhomes Ii	DC001	D.C Housing Authority	47	N/a	N/a	N/a	N/a	N/a
Fairlawn Marshall	DC001	D.C Housing Authority	30	0%	100%	0%	N/a	55%
Glenncrest	DC001	D.C Housing Authority	61	N/a	N/a	N/a	N/a	N/a
Sheridan Station Phase I (Multifamily)	DC001	D.C Housing Authority	45	2%	98%	0%	N/a	36%
Matthews Memorial Terrace Apartments	DC001	D.C Housing Authority	35	N/a	N/a	N/a	N/a	N/a
Gibson Plaza	DC001	D.C Housing Authority	53	N/a	N/a	N/a	N/a	N/a
The Avenue (Park Morton)	DC001	D.C Housing Authority	27	4%	92%	4%	N/a	8%
Victory Square Senior Apartments	DC001	D.C Housing Authority	35	0%	100%	0%	N/a	N/a
Highland Dwellings	DC001	D.C Housing Authority	182	1%	97%	2%	N/a	67%
Wade Apartments	DC001	D.C Housing Authority	20	N/a	N/a	N/a	N/a	N/a
Greenleaf Gardens	DC001	D.C Housing Authority	451	2%	95%	3%	N/a	29%
Syphax Gardens	DC001	D.C Housing Authority	168	0%	99%	1%	N/a	61%
Kentucky Courts	DC001	D.C Housing Authority	116	0%	94%	6%	N/a	1%

Potomac Gardens	DC001	D.C Housing Authority	339	42%	54%	2%	1%	34%
Kenilworth Courts	DC001	D.C Housing Authority	288	2%	98%	0%	N/a	62%
Henson Ridge - Phase 1	DC001	D.C Housing Authority	68	0%	96%	4%	N/a	48%
Kentucky Courts	DC001	D.C Housing Authority	12	N/a	N/a	N/a	N/a	N/a
Capper Senior I	DC001	D.C Housing Authority	162	0%	98%	0%	1%	N/a
Capitol Gateway	DC001	D.C Housing Authority	62	0%	100%	0%	N/a	45%
Oxford Manor	DC001	D.C Housing Authority	30	0%	100%	0%	N/a	48%
St. Martin	DC001	D.C Housing Authority	51	N/a	N/a	N/a	N/a	N/a
Capper Senior Ii	DC001	D.C Housing Authority	139	11%	86%	4%	N/a	4%
Barry Farms Dwellings	DC001	D.C Housing Authority	437	N/a	N/a	N/a	N/a	N/a
Langston Terrace	DC001	D.C Housing Authority	272	1%	96%	3%	N/a	18%
Wade Apartments	DC001	D.C Housing Authority	36	0%	100%	0%	N/a	57%
Wheeler Creek	DC001	D.C Housing Authority	100	N/a	N/a	N/a	N/a	N/a
Wheeler Creek	DC001	D.C Housing Authority	48	N/a	N/a	N/a	N/a	N/a
Hopkins Apts	DC001	D.C Housing Authority	154	30%	67%	3%	N/a	60%
Woodland Terrace	DC001	D.C Housing Authority	370	0%	98%	1%	0%	47%
Carroll Apartments	DC001	D.C Housing Authority	96	2%	98%	0%	N/a	25%
Parkside Pollin Memorial	DC001	D.C Housing Authority	42	0%	100%	0%	N/a	40%

4800 Nannie Helen Burroughs	DC001	D.C Housing Authority	23	0%	100%	0%	N/a	58%
Sheridan Station Phase Iii	DC001	D.C Housing Authority	65	0%	98%	0%	2%	77%
James Creek	DC001	D.C Housing Authority	236	2%	97%	0%	0%	44%
Kelly Miller Dwellings	DC001	D.C Housing Authority	159	0%	95%	4%	1%	49%
Sibley Plaza	DC001	D.C Housing Authority	68	34%	64%	0%	N/a	48%
Sibley Plaza	DC001	D.C Housing Authority	170	24%	69%	7%	N/a	9%
Park-Morton Apts	DC001	D.C Housing Authority	184	1%	94%	3%	2%	45%
Garfield Terrace	DC001	D.C Housing Authority	46	2%	95%	3%	N/a	71%
Garfield Senior	DC001	D.C Housing Authority	226	0%	95%	4%	0%	N/a
Ledroit Apartments	DC001	D.C Housing Authority	121	1%	90%	8%	2%	10%
Montana Terrace	DC001	D.C Housing Authority	66	2%	94%	5%	N/a	72%
Edgewood Terrace Seniors Development	DC001	D.C Housing Authority	89	0%	85%	9%	4%	N/a
Claridge Towers	DC001	D.C Housing Authority	341	9%	85%	6%	N/a	N/a
Horizon House	DC001	D.C Housing Authority	107	12%	78%	9%	1%	N/a
Horizon House Ufas	DC001	D.C Housing Authority	19	0%	100%	0%	N/a	7%
Fort Lincoln	DC001	D.C Housing Authority	118	0%	99%	1%	N/a	N/a
Judiciary House	DC001	D.C Housing Authority	259	2%	94%	3%	0%	N/a
Harvard Towers	DC001	D.C Housing Authority	189	2%	93%	4%	N/a	1%

Lincoln Heights	DC001	D.C Housing Authority	618	2%	98%	0%	N/a	64%
Regency House	DC001	D.C Housing Authority	157	20%	67%	12%	1%	N/a
James Apartments	DC001	D.C Housing Authority	140	2%	88%	9%	2%	N/a
1475 Columbia Road	DC001	D.C Housing Authority	44	0%	91%	7%	2%	19%
Benning Terrace	DC001	D.C Housing Authority	281	3%	95%	2%	0%	66%
Stoddert Terrace	DC001	D.C Housing Authority	352	2%	96%	2%	N/a	41%

<b>Project-Based Section 8</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Parkchester Associates	N/a	N/a	94	0%	100%	0%	N/a	57%
The Pentacle	N/a	N/a	50	0%	100%	0%	N/a	58%
Ritch Homes	N/a	N/a	42	5%	88%	5%	2%	39%
Robert L Walker House	N/a	N/a	68	0%	100%	0%	N/a	2%
Northwest Co-Op #17	N/a	N/a	46	0%	100%	0%	N/a	41%
Oak Street Apartments	N/a	N/a	50	0%	78%	20%	2%	24%
Park Road Apartments	N/a	N/a	150	3%	52%	33%	11%	N/a
Sayles Place Homes Apts	N/a	N/a	12	N/a	N/a	N/a	N/a	N/a
St James Mutual Home	N/a	N/a	36	31%	65%	0%	4%	8%
St. Mary'S Court	N/a	N/a	140	62%	24%	7%	6%	N/a
Forest Ridge-The Vistas	N/a	N/a	381	2%	97%	1%	N/a	76%
Stoneridge I	N/a	N/a	22	0%	100%	0%	N/a	55%
Stoneridge Apts. Sec Ii	N/a	N/a	46	0%	100%	0%	N/a	58%

Sursum Corda	N/a	N/a	153	1%	98%	0%	N/a	41%
Chhi House (Otis House)	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Paradise At Parkside	N/a	N/a	261	0%	99%	0%	0%	42%
W Street Apartments	N/a	N/a	18	0%	93%	7%	N/a	50%
Faircliff Plaza East	N/a	N/a	80	4%	58%	37%	1%	53%
Portner Place	N/a	N/a	48	0%	95%	5%	N/a	42%
Tel Court Cooperative	N/a	N/a	56	2%	93%	0%	2%	41%
Terrific Inn	N/a	N/a	14	0%	92%	0%	8%	N/a
Wah Luck House	N/a	N/a	152	1%	N/a	0%	99%	4%
Wheeler Terrace	N/a	N/a	112	2%	98%	0%	N/a	58%
Woodley House	N/a	N/a	6	0%	100%	0%	N/a	N/a
Trinity Towers	N/a	N/a	122	2%	98%	0%	N/a	33%
Allen House	N/a	N/a	95	1%	98%	1%	N/a	N/a
Anchor Housing	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Asbury Dwellings	N/a	N/a	146	5%	93%	2%	N/a	N/a
Atlantic Gardens	N/a	N/a	108	0%	100%	0%	N/a	72%
Azeeze Bates	N/a	N/a	18	0%	100%	0%	N/a	63%
Brookland Manor	N/a	N/a	373	1%	97%	2%	N/a	44%
Beecher Cooperative	N/a	N/a	18	N/a	N/a	N/a	N/a	N/a
Benning Courts	N/a	N/a	97	0%	100%	0%	N/a	66%
Atlantic Terrace	N/a	N/a	196	0%	100%	0%	N/a	62%
Columbia Heights Village Apts	N/a	N/a	406	2%	89%	8%	1%	48%
Fairmont I And Ii Apartments	N/a	N/a	205	29%	61%	5%	3%	42%
Friendship Terrace	N/a	N/a	40	65%	25%	8%	3%	N/a
Garfield Hills Apts	N/a	N/a	93	8%	91%	1%	N/a	66%
Gibson Plaza	N/a	N/a	122	2%	74%	4%	21%	31%
Glenn Arms Apts	N/a	N/a	45	0%	40%	60%	N/a	22%
Golden Rule Apartments	N/a	N/a	183	2%	97%	1%	N/a	44%

Green Door	N/a	N/a	10	8%	92%	0%	N/a	N/a
Second New St. Paul Housing	N/a	N/a	72	1%	99%	0%	N/a	N/a
Hedin House	N/a	N/a	35	3%	94%	3%	N/a	N/a
Huntington Village	N/a	N/a	202	12%	88%	0%	N/a	72%
1330 7th Street Apartments	N/a	N/a	134	1%	95%	2%	2%	46%
Ivy City	N/a	N/a	60	2%	98%	0%	N/a	75%
Johnson Towers	N/a	N/a	54	13%	87%	0%	N/a	N/a
Kenyon Apartments	N/a	N/a	18	0%	72%	28%	N/a	45%
King Towers	N/a	N/a	25	0%	72%	28%	N/a	28%
Christopher Price House Aka Belmont	N/a	N/a	20	0%	95%	5%	N/a	5%
Morris Road	N/a	N/a	30	0%	100%	0%	N/a	86%
Tyler House	N/a	N/a	284	1%	98%	0%	1%	62%
Galen Terrace	N/a	N/a	84	0%	100%	0%	N/a	74%
Southern Hills Apts	N/a	N/a	255	0%	99%	1%	N/a	51%
Savannah Ridge Aka Woodberry Villag	N/a	N/a	124	40%	60%	0%	N/a	59%
Langston Lane	N/a	N/a	118	2%	98%	0%	N/a	72%
Lincoln Westmoreland I	N/a	N/a	82	1%	95%	1%	3%	44%
Mayfair Mansions	N/a	N/a	320	1%	97%	1%	0%	47%
Museum Square One Apts.	N/a	N/a	302	N/a	N/a	N/a	N/a	N/a
Samuel J. Simmons Ncba Estates	N/a	N/a	174	23%	71%	5%	1%	N/a
Northwest Co-Op #15	N/a	N/a	48	8%	92%	0%	N/a	37%
Benning Heights	N/a	N/a	148	0%	99%	1%	N/a	48%
Benning Park Apartments	N/a	N/a	193	1%	99%	0%	N/a	66%
Campbell Heights	N/a	N/a	170	6%	82%	1%	N/a	N/a
Capitol Hill Towers	N/a	N/a	204	2%	94%	2%	1%	N/a
Capitol Manor	N/a	N/a	19	8%	42%	50%	N/a	17%
Carmel Plaza North	N/a	N/a	40	0%	86%	3%	11%	42%

Carver Hall Apts.	N/a	N/a	95	0%	100%	0%	N/a	60%
Cavalier Apartments (Hubbard Place)	N/a	N/a	230	11%	87%	1%	1%	32%
Claypoole Apartments	N/a	N/a	122	3%	92%	5%	N/a	50%
Congress Park I	N/a	N/a	162	0%	100%	0%	N/a	61%
Congress Park II	N/a	N/a	214	0%	99%	0%	N/a	67%
The Covington Family Association, I	N/a	N/a	21	18%	29%	53%	N/a	12%
Delta Towers	N/a	N/a	149	7%	90%	3%	N/a	N/a
Elsinore Courtyards (Dhaka House)	N/a	N/a	12	N/a	N/a	N/a	N/a	N/a
Vantage And The Park	N/a	N/a	114	1%	98%	1%	N/a	53%
The Vista	N/a	N/a	103	2%	96%	2%	N/a	32%
Faircliff Plaza West	N/a	N/a	111	1%	54%	45%	N/a	42%
Fort Lincoln Senior Village II	N/a	N/a	176	1%	97%	2%	N/a	N/a
Fort. Lincoln Senior Village III	N/a	N/a	304	3%	96%	1%	N/a	N/a
Fort Lincoln Senior Village I	N/a	N/a	187	2%	96%	2%	N/a	N/a
Foster House	N/a	N/a	76	6%	93%	0%	2%	19%
Franklin Commons	N/a	N/a	100	1%	97%	2%	N/a	52%
Frederick Douglas Gardens	N/a	N/a	150	0%	99%	1%	N/a	48%

<b>Other Multifamily Assisted Housing</b>								
<b>Development Name</b>	<b>PHA Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Households with Children</b>
Capitol Commons	N/a	N/a	40	0%	97%	3%	N/a	N/a
Colony House Apartments	N/a	N/a	57	7%	88%	5%	N/a	N/a
Otto B. Berg	N/a	N/a	25	0%	100%	0%	N/a	33%
Hearth Foundation	N/a	N/a	13	N/a	N/a	N/a	N/a	N/a
Dupont Park Adventist Apartments	N/a	N/a	44	0%	100%	0%	N/a	N/a
Sunflower House	N/a	N/a	20	21%	26%	42%	11%	16%

Kennedy Institute	N/a	N/a	15	55%	36%	0%	9%	N/a
Riley-Cheeks House, Inc.	N/a	N/a	13	0%	100%	0%	N/a	N/a
Merigold Place, Inc.	N/a	N/a	7	N/a	N/a	N/a	N/a	N/a
Edgewood Terrace Iii	N/a	N/a	73	3%	94%	2%	2%	N/a
North Capital At Plymouth	N/a	N/a	68	5%	94%	0%	2%	N/a
Victory Heights, Inc.	N/a	N/a	75	8%	81%	8%	1%	N/a
54th Street Corporation	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a

Note 1: For LIHTC properties, this information will be supplied by local knowledge., Note 2: Percentages may not add to 100 due to rounding error., Note 3: Data Sources: APSH, Note 4: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

## **Additional Contributing Factors Specific to Publicly Supported Housing Location and Occupancy**

The following contributing factors refer specifically to policies and practices in the administration of publicly supported housing in the District and Region. It is important to note, however, that the other contributing factors discussed in detail above affect the distribution and conditions of publicly supported households, just as they do for other households in the District; and the location, conditions, and occupancy of publicly-supported housing similarly contribute to general fair housing issues such as residential segregation, R/ECAPs, disparities in access to opportunity, and disproportionate housing needs.

### Publicly Supported Housing - site selection and redevelopment policies

Site selection and redevelopment policies are a significant contributing factor to fair housing issues in the District.

The District of Columbia Housing Authority (DCHA) has embarked on a series of redevelopment initiatives and RAD transactions, as described in more detail below, with its public housing administration. DCHA and other city agencies should be careful to plan for and monitor the fair housing impacts of replacement unit designations (including for family sized units) and siting. This includes accounting for patterns of poverty concentration, segregation, and disparities in access to opportunity, as well as the increasing pressure of rising rents and displacement in many areas. DCHA's stated policy is to ensure 1-for-1 unit replacements throughout its redevelopments.<sup>249</sup> However, stakeholders have raised concerns regarding unit composition (in particular the inclusion of sufficient numbers of new family units) and the prospect of current public housing tenants receiving vouchers without adequate new available units on the market.

#### *Development and redevelopment initiatives (including Rental Assistance Demonstration)*

DCHA, along with most of our nation's public housing, suffers from a severe lack of federal funding to meet the need for units among qualifying households and to maintain habitable conditions within its existing portfolio. DCHA has announced a 20-year plan to address its current redevelopment needs.<sup>250</sup> The first phase of the plan focuses on 14 properties (approximately 2610 units) determined to require urgent intervention due to habitability issues, though DCHA's full portfolio (41 sites with 6,803 units of public housing) is ultimately in need of additional capital. The plan would entail conversation to federal subsidy programs other than public housing, such as the Rental Assistance Demonstration (RAD) and Demolition/Disposition programs, which would leverage private financing. Where extensive demolition and development activities occur, tenants will receive tenant protection vouchers enabling them to move offsite (with an ultimate right of return). DCHA has also noted the need for additional financial support from the District, as well as the possibility of a Low Income Housing Tax Credit set aside and land use changes that would provide for increased density (potentially

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<sup>249</sup> See DCHA Board Resolution 19-01 for more information at <http://www.dchousing.org/docs/ks0tqjcr214.pdf>

<sup>250</sup> Our People, Our Portfolio, Our Plan: DCHA 20-Year Transformation Plan, available at [https://dcha.us/img/guest\\_uploads/temp\\_rimehhGVtC15670083132z6ZwtkqRDhoZKdydLeU.pdf](https://dcha.us/img/guest_uploads/temp_rimehhGVtC15670083132z6ZwtkqRDhoZKdydLeU.pdf).

allowing for the development of additional affordable or market rate units), as well as possible land swaps between the District and DCHA (allowing more site flexibility) or low cost land sales to DCHA from the District.

DCHA currently has a number of active development and redevelopment projects, including at Barry Farm, Bruce Monroe, Kenilworth Courts, the Strand, and Providence Place (each of which include a number of replacement units, varying from project to project; fuller details are available in DCHA's 2019 MTW Plan).<sup>251</sup> DCHA is also exploring funding sources and additional plans for capital improvements and redevelopment, for example "through Choice Neighborhood Initiatives (CNI) or other federal grant opportunities, RAD, Low Income Housing Tax Credits, Historic Tax Credits, New Market Tax Credits, Tax-Exempt Bonds, FHA financing, and private financing. Based on a thoughtful process of assessing viable planning projects, approximately 2,350 units are being considered for potential disposition/demolition. However, demolition timetables and the list of disposition/demolition candidate properties will be determined as planning and development evolve."

DCHA is also already undergoing a significant number of Rental Assistance Demonstration (RAD) conversions:<sup>252</sup> "DCHA submitted applications to receive five Commitment to enter into a Housing Assistance Payment (CHAPs) from its FY2016 portfolio reservation. The five CHAPs cover Ontario, The Villager, Elvans Road, Montana and Lincoln Road, for a total of 140 units. DCHA also anticipates using RAD in the future as a tool to fund capital needs and stabilize DCHA properties within the senior and family portfolios. In addition, DCHA plans to explore using RAD to stabilize mixed-income properties such as Wheeler Creek and to help achieve the redevelopment goals of projects like Barry Farm." DCHA is using its MTW authority to mitigate rent changes households may experience when converting from public housing to the project-based voucher subsidy Rental Assistance Demonstration (RAD) Program. Households in RAD conversions will be entitled to choice mobility rights a year into project conversation (should they chose to exercise such rights), entailing additional notifications and counseling from DCHA.

#### *New Communities Initiative:*

DCHA's New Communities Initiative is described as "a local government initiative designed to revitalize severely distressed subsidized housing and redevelop neighborhoods into vibrant mixed-income communities." According to its 2019 MTW Plan, "DCHA plans to take action to remove approximately 619 Public Housing units in FY2019. This includes 477 units that are a part of the District's New Communities Initiative (NCI). All of the NCI redevelopment includes one-for-one replacement and DCHA will continue to engage Public Housing residents, community stakeholders, the City and developers to review and update the NCI redevelopment plans for each site. In addition, DCHA anticipates removing 140 units from the agency's public housing portfolio for conversion to project based vouchers under the Rental Assistance Demonstration (RAD) program."<sup>253</sup>

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<sup>251</sup> DCHA 2019 MTW Plan at 6-7.

<sup>252</sup> Id.

<sup>253</sup> DCHA 2019 MTW Plan at 11-12.

*Choice Neighborhoods planning grants.*<sup>254</sup>

DCHA has received and completed two Choice Neighborhoods Initiative (CNI) planning grants, at Barry Farm and Kenilworth, and may consider additional CNI applications for implementation grants in the near future.

*Site Selection – Low Income Housing Tax Credit Policies*

Washington, D.C. also administers Low Income Housing Tax Credits through its Housing Finance Agency (DCHFA). Within the proposed 2019 QAP<sup>255</sup>, prioritization scoring for tax credit allocation includes demographic criteria (predominantly for family-oriented and permanent supportive housing units) and location criteria (including 3 points for transit proximity (1/2 mile within a Metrorail or street car stop), 2 points for Opportunity Zones, and 19 points for Economic Opportunity Targeting). Although the transit and Opportunity Zone points are relatively low, these points may serve as counter-incentives to poverty deconcentration. Economic Opportunity Targeting aims to counterbalance the predominant siting of low-income housing in areas of high poverty concentration. These designations are intended to provide access to low crime, low poverty areas with high quality schools and jobs. D.C. Census Tracts are divided into six zones.

In addition, the Department has specified that it has the ability to award basis boosts (increasing the value of the tax credit for 9% tax credit projects) according to attributes that it has identified (the “Department’s Basis Boosts”): high land values as supported by its Economic Opportunity Targeting map; projects located in Census tracts with less than 5% of households below poverty level or that are designated middle or upper income level; or projects that receive maximum points for economic opportunity targeting, mixed-income composition; and family-oriented units. Projects may alternatively receive basis boosts because of location in areas designated by HUD as Difficult Development Areas (DDAs), characterized by high development costs, or Qualified Census Tracts (QCTs), characterized by high poverty rates.

As per the 2019 draft QAP, planned LIHTC developments are to include a community engagement plan (which should not consider ANC or other letters of approval). And if the development results in temporary or permanent displacement, the applicant must submit a relocation and Anti-Displacement Plan.

Publicly Supported Housing - impediments to mobility

Impediments to mobility are a moderate contributing factor affecting housing choice for assisted households (and thus in turn affecting fair housing issues such as segregation). DCHA has taken a number of steps to ease the housing search process for voucher holders, as noted below.

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<sup>254</sup> DCHA 2019 MTW Plan at 15.

<sup>255</sup> Available at

[https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/page\\_content/attachments/2019%20DHCD%20Low%20Income%20Housing%20Tax%20Credit%20Qualified%20Allocation%20Plan%20%28DRAFT%29.pdf](https://dhcd.dc.gov/sites/default/files/dc/sites/dhcd/page_content/attachments/2019%20DHCD%20Low%20Income%20Housing%20Tax%20Credit%20Qualified%20Allocation%20Plan%20%28DRAFT%29.pdf)

### *Security deposit assistance*

DCHA has a Unit Protection Incentive Program, which it states is “an additional resource to the HCV toolkit that focuses on eliminating security deposits as a barrier to HCV clients when trying to find a unit to lease, while offering an incentive to landlords interested in assistance with funding unit repairs when a tenant moves. The DCHA Unit Protection Incentive Program (UPIP) will guarantee funding not to exceed contract rent to cover unit damages for participating landlords/owners in lieu of a family providing a security deposit prior to move-in.” DCHA received authority to develop this program using its MTW flexibility.

### *Inspections*

DCHA recently has switched over to a HCV Biennial Inspection Program for Landlords in Good Standing, noting that “DCHA anticipates improvements in the quality of the HCV housing stock through the new biennial inspections program, along with a reduction in the annual inspection costs.” With regard to initial move-ins, stakeholders noted that the inspections process can sometimes be lengthy, creating a disincentive for landlords to participate in the HCV program (despite the "source of income" protection law).

### *Search times*

HCV participants receive 180 days to lease up after receiving a voucher, more than the 60 days required by HUD, better enabling them to search for available units.

### *Payment standards*

The Washington, D.C., metropolitan region is subject to the mandatory Small Area Fair Market rent rule, which provides for HCV payment standards to be calculated by zip code, providing greater access to areas of opportunity. However, because of its MTW status, DCHA has instead implemented its own system of payment standards, in order to adjust for local conditions and ensure that HCV holders can access a range of neighborhoods, including those with higher rents. This rent structure provides for payment standards above either the FMR or the SAFMR specifically to enable access to higher cost neighborhoods and prevent voucher concentration issues.<sup>256</sup>

### Publicly Supported Housing - occupancy and tenant selection policies

DCHA maintains a community-wide waiting list for its public housing, which is currently closed (with approximately 26,700 households currently on the list). The waitlist is maintained on a first come, first served basis, subject to certain preferences. (These include elderly families or those with a member with a disability for some properties, and for other properties, preferences intended to achieve a mix of working and non-working families.) Wait lists are site-based for “service rich” housing, and may be either open or closed depending on the site. As noted above, most project-based voucher waitlists are site specific. The Housing Choice Voucher list is

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<sup>256</sup> See DCHA 2019 MTW Plan at 52-53. Rent structure description available here: [http://www.dchousing.org/rent\\_hcvp.aspx/default.aspx](http://www.dchousing.org/rent_hcvp.aspx/default.aspx).

currently closed (with approximately 40,000 prospective applicants), and is community-wide. Preferences include those for homeless households, those in substandard housing, or who have been displaced under certain conditions or are severely rent burdened, as defined under 14-76 DC Code 7604-05.

### Publicly Supported Housing - quality of affordable housing information programs

The quality of affordable housing information programs is a significant contributing factor to fair housing issues in the District. DCHA has taken steps to provide in-depth counseling services to assisted residents, but the need for such services is likely to expand given the extent of redevelopment being undertaken.

#### *DCHA – landlord listings and outreach*

DCHA policies provide that the housing authority promote housing choice by expanding the rental options available to voucher holders, by “encouraging program participation outside areas of poverty or minority concentration”; DCHA policies state that it initiates contact with owners and holds meetings to encourage program participation by owners of units in such areas. DCHA policies further provide that it should hold briefings for owners of units in targeted areas, as determined by periodic assessments of the geographic distribution of assisted families.<sup>257</sup> DCHA also maintains a list of available rentals for consultation by program participations in search of a unit. As per HUD’s current regulation on portability, DCHA must ensure that this list provides options outside areas of concentrated poverty.

#### *DCHA – housing mobility counseling*

DCHA provides information on the benefits of "moving to opportunity" as part of its standard voucher briefings, and has a dedicated counseling program with optional participation by HCV program participants. This includes mobility counseling, as well as other counseling on housekeeping, financial management, etc, enabling participants to obtain a certification that can be used to encourage landlord participation. Counseling is also provided to residents who live at properties that are undergoing demolition and disposition processes.

#### *Other affordable housing (DCHCD)*

The quality of affordable housing information programs in the District is a contributing factor for residents who seek affordable units or information about DC’s various affordable housing policies. DC Housing Search, the online tool used to look for units that fall under DC’s Affordable Dwelling Unit and Inclusionary Zoning programs, has potential for improvement in its accuracy and readability of information. Several outdated listings, as well as units identified in the wrong location on the map feature, were found in a quick visit to the tool’s search function. As a critical tool for residents to search for housing they can afford, the Housing Search has room to increase its comprehensiveness.

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<sup>257</sup> DCA Administrative Plan at 11-12.

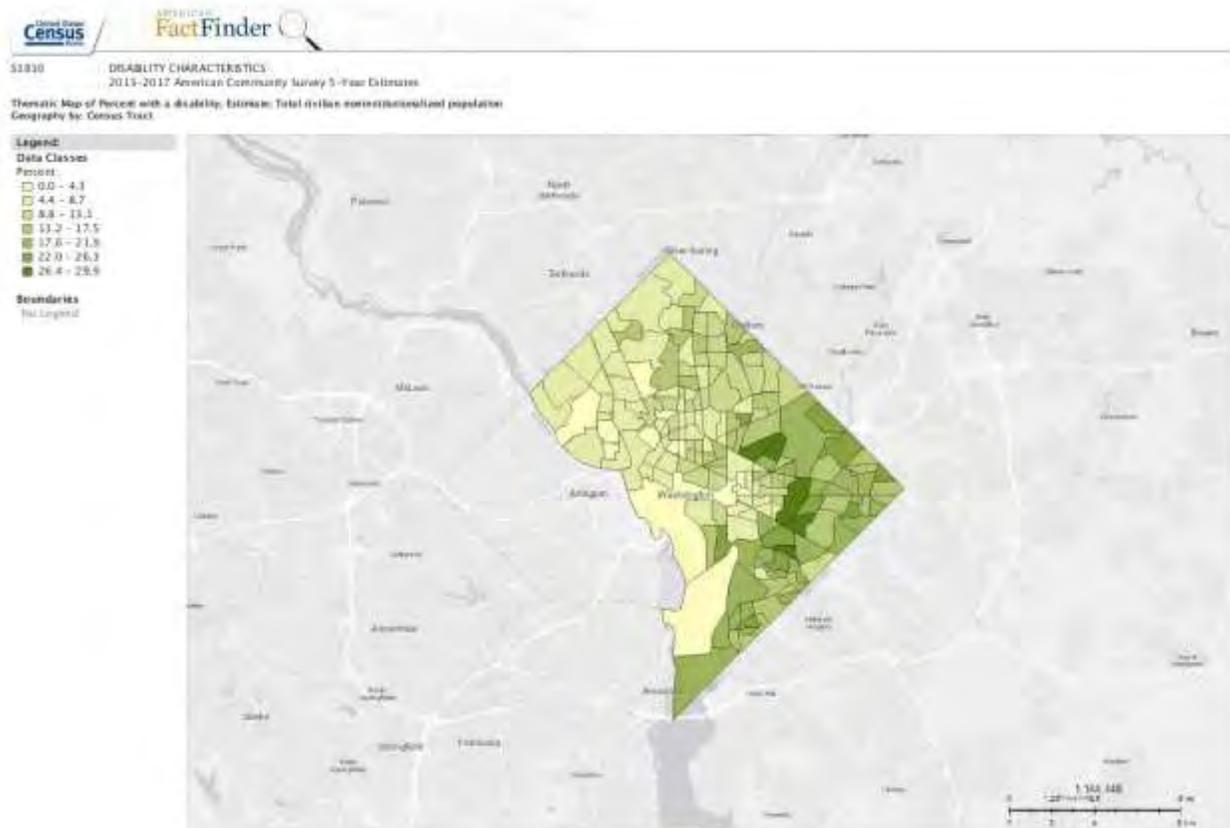
## **D. Disability and Access Analysis**

As the previous sections have evaluated such fair housing issues as segregation/integration, R/ECAPs, disproportionate housing needs, and disparities in access to opportunity, the Disability and Access section evaluates each of these topics in relation to the needs and rights of persons with disabilities. The following analysis identifies unique barriers that people with disabilities may experience in accessing affordable housing, as well as housing that is built to accommodate their disabilities. This analysis also evaluates supportive services and other programs available to people with disabilities. D.C. is a national leader in some areas; for example, the Home and Community Based Services Waiver provides among the most well-funded for people with developmental disabilities living in integrated settings of any jurisdiction in the country. However, this analysis also identifies areas for improvement. For example, the amount of affordable, accessible housing units falls short of need in the District, and existing units tend to follow the same patterns of concentration that persist with regard to affordable housing generally, being disproportionately located in low income and predominantly Black neighborhoods in the eastern part of the District.

### **1. Population Profile**

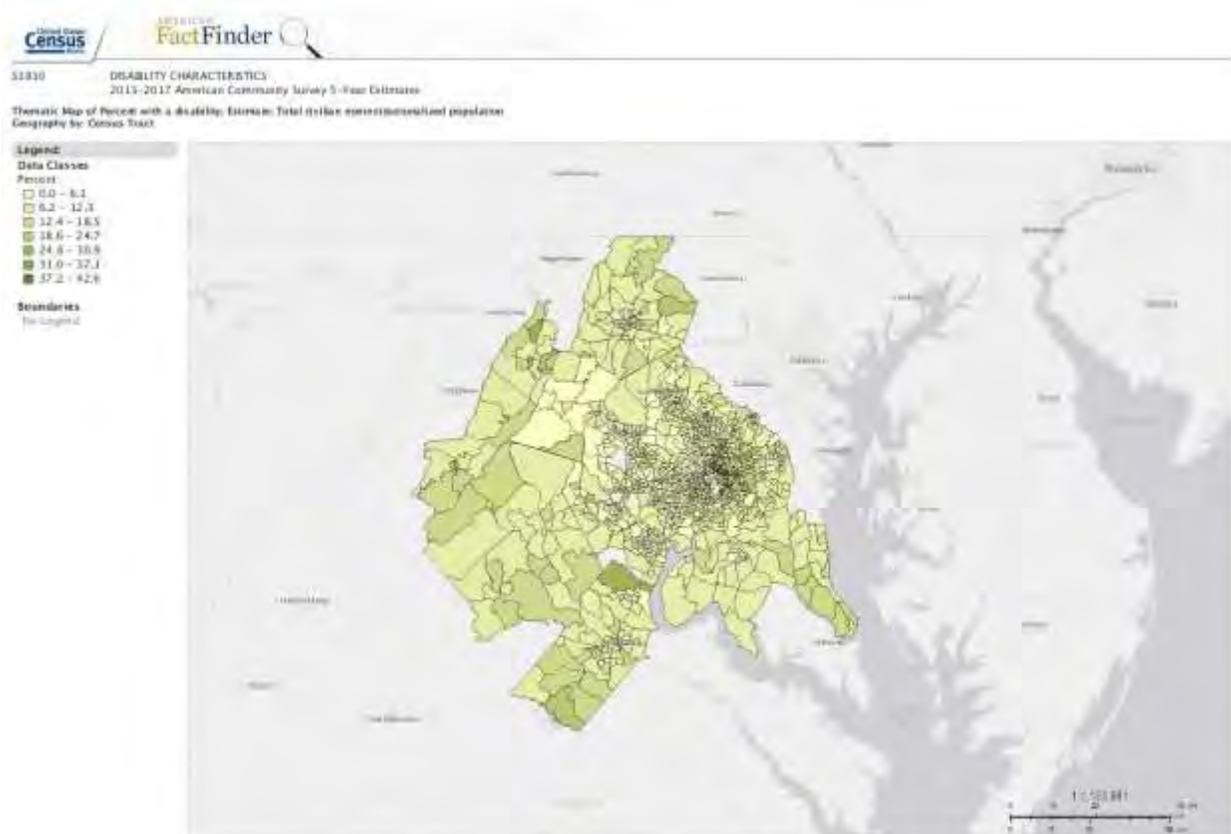
- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including, R/ECAPs and other segregated areas identified in previous sections?*

## Map 1: Disability Characteristics, Washington, D.C.



As the map above reflects, the census tracts within D.C. that have the highest concentrations of persons with disabilities are generally in predominantly Black neighborhoods in Northeast and Southeast and in Wards 5, 7, and 8, in particular. Areas of especially high concentration include the vicinity of Gallaudet University, a primarily non-residential tract stretching to the south of RFK Stadium that includes the D.C. Central Detention Facility and the Correctional Treatment Facility, and a tract in Southeast that includes the large Marbury Plaza apartment complex. Serving students with hearing disabilities is central to Gallaudet's mission. There is a significant degree of overlap between census tracts with high concentrations of persons with disabilities and R/ECAPs. On the other hand, middle- and high-income neighborhoods that are predominantly Black, which are concentrated in Ward 4, do not have disproportionately high concentrations of persons with disabilities. Predominantly White census tracts, concentrated in Ward 3 and portions of Wards 2 and 6, and racially and ethnically diverse gentrifying areas, concentrated in Ward 1 and parts of Wards 2, 4, 5, and 6, all tend to have low concentrations of persons with disabilities.

## Map 2: Disability Characteristics, Washington-Arlington-Alexandria, DC-VA-MD-WV Region



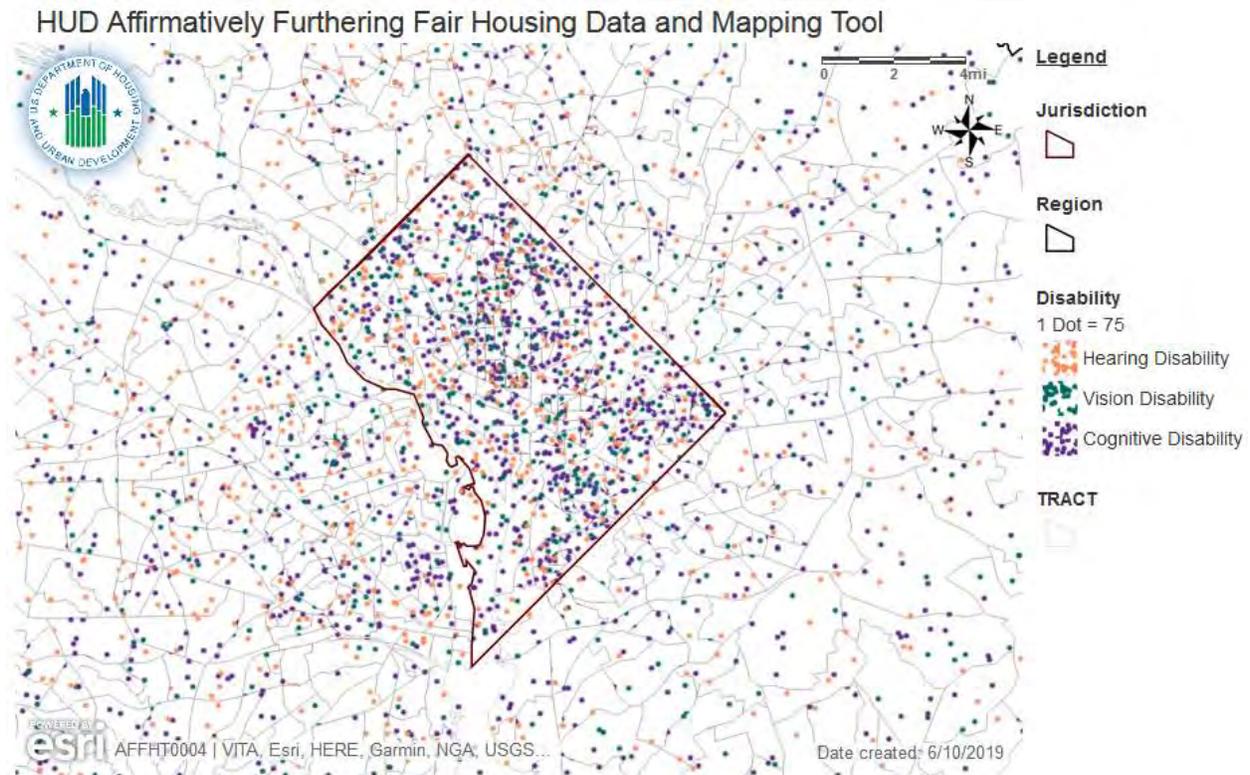
In the broader Region, the areas with the highest concentrations of persons with disabilities are at two extremes. First, there are the areas of concentration in predominantly Black, low-income neighborhoods in D.C. Second, there are areas of concentration in predominantly White, moderate- to middle-income rural and semi-rural areas at the fringes of the Region. Suburban portions of the Region, which are more racially and ethnically diverse than the rural fringe but which have fewer Black residents than D.C., tend to have the lowest concentrations of persons with disabilities. Included among these areas are places with high concentrations of Hispanic and Asian American or Pacific Islander residents. As the table below reflects, the median age for Hispanic and Asian American or Pacific Islander residents of the Region is significantly lower than it is for White residents. Since age and disability status are closely related, with elderly people more likely to have disabilities, it is predictable that there would be comparatively few persons with disabilities residing in the areas of Hispanic and/or Asian American or Pacific Islander concentration with younger populations, on average.

**Table 1: Median Age by Race or Ethnicity, Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area, 2013-2017 American Community Survey 5-Year Estimates**

Race or Ethnicity	Median Age
White, Not Hispanic	40.8
Black	36.8
Asian	37.6
Native Hawaiian or Other Pacific Islander	36.0
Hispanic	30.1

- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

**Map 3: Disability by Type (Hearing, Vision, Cognitive), Washington, D.C.**



**Name:** Map 14 - Disability by Type

**Description:** Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

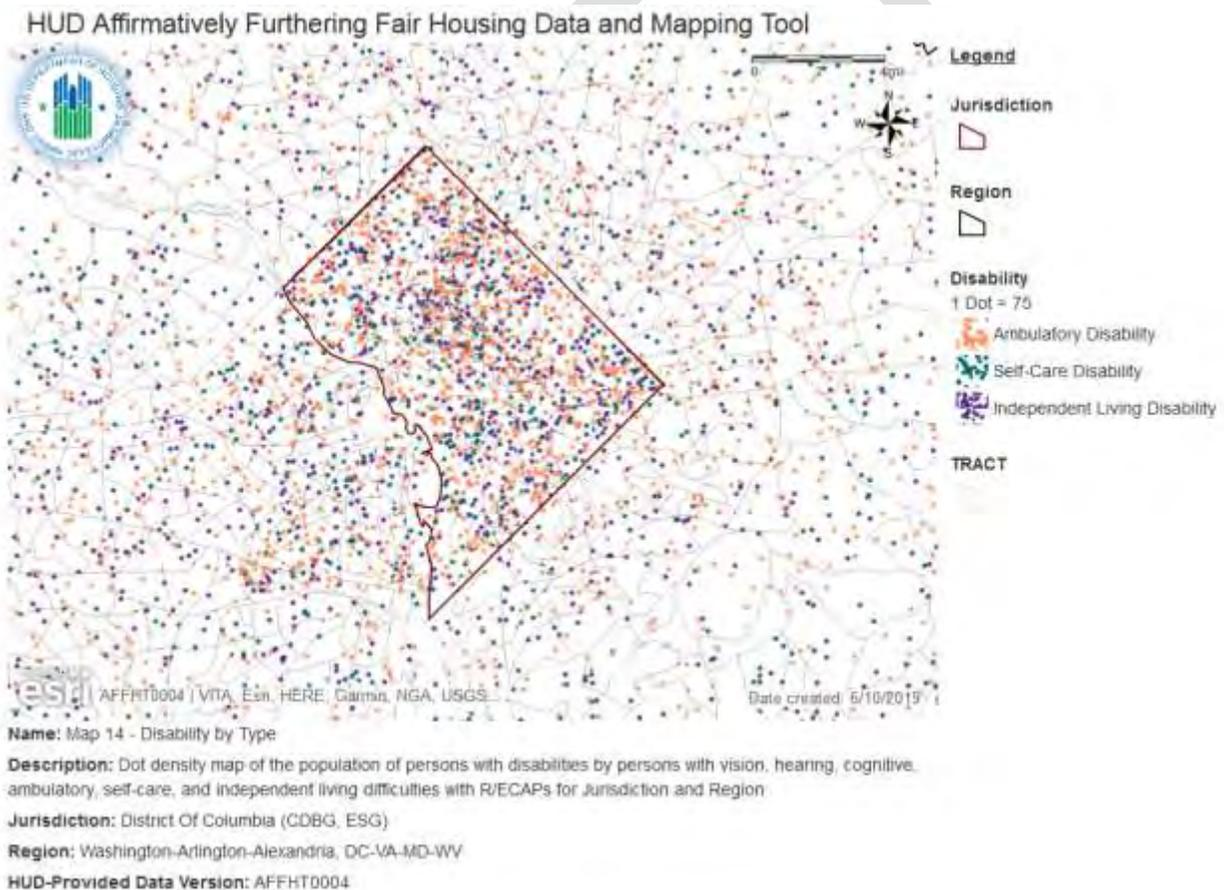
**Jurisdiction:** District Of Columbia (CDBG, ESG)

**Region:** Washington-Arlington-Alexandria, DC-VA-MD-WV

**HUD-Provided Data Version:** AFFHT0004

When broken down by specific disability, there is significant variation throughout D.C. in the concentration of people with disabilities. Individuals with hearing disabilities are relatively evenly distributed throughout the District, with pockets of higher concentration near Gallaudet University. Individuals with hearing disabilities are less concentrated in the densest gentrifying or gentrified neighborhoods, which have relatively young populations. The population of individuals with vision disabilities, which is also correlated with age, are somewhat similarly distributed throughout the District. Gentrifying, centrally-located neighborhoods and areas adjacent to college campuses like the Tenleytown section of Ward 3 tend to have few residents with vision disabilities, but other neighborhoods, regardless of their racial and ethnic composition, tend to have higher concentrations. By contrast, there are much greater significant concentrations of individuals with cognitive disabilities residing in low-income, predominantly Black neighborhoods in Wards 5, 7, and 8. Some of the census tracts with the highest concentrations of people with cognitive disabilities are also R/ECAPs.

**Map 4: Disability by Type (Ambulatory, Self-Care, Independent Living), Washington, D.C.**



There are concentrations of persons with ambulatory disabilities in predominantly Black neighborhoods across D.C., regardless of their socioeconomic status. Unlike for people with disabilities generally, there are significant concentrations of people with ambulatory disabilities in middle- and upper-income neighborhoods in Ward 4. However, both gentrifying and predominantly White neighborhoods have comparatively low concentrations of individuals with

ambulatory disabilities. The same is largely true with respect to the distribution of persons with self-care and independent living disabilities, though it is also important to note that there are concentrations in the vicinity of Hill East and Barney Circle in Ward 6. That area is more heavily Black than Ward 6 as a whole.

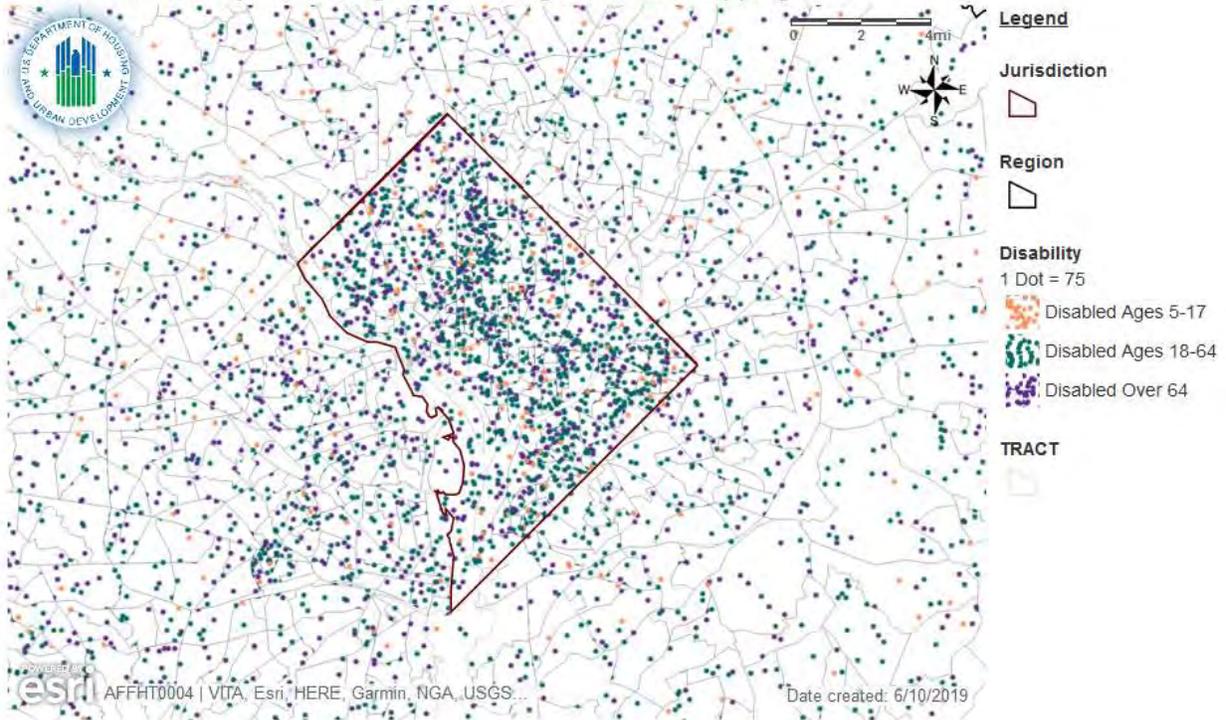
**Table 2: Disability by Type, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

Disability Type	Washington, D.C.		Washington-Arlington-Alexandria, DC-VA-MD-WV Region	
	Number	Percentage	Number	Percentage
Hearing Difficulty	12,300	2.15%	113,491	2.14%
Vision Difficulty	13,453	2.35%	75,094	1.42%
Cognitive Difficulty	28,856	5.04%	163,053	3.08%
Ambulatory Difficulty	36,878	6.45%	226,972	4.29%
Self-care Difficulty	12,805	2.24%	87,848	1.66%
Independent Living Difficulty	22,958	4.01%	158,349	2.99%

The table reflects the percentage of persons with different types of disabilities in D.C. and the Region. These data corroborate the conclusions about the distribution of the population of persons with disabilities generally in the Region. For all types of disabilities, there is a higher concentration of persons with disabilities in the District than in the balance of the Region. D.C. Columbia is much more heavily Black and low-income than is the remainder of the Region. For hearing, vision, and self-care disabilities, the difference is relatively modest, whereas, for cognitive, ambulatory, and independent living disabilities, the gap is wide. Importantly, cognitive, ambulatory, and independent living disabilities may be more associated with risk of institutionalization and the need for accessible housing features, placing a greater onus of providing such resources on the District.

## Map 5: Disability by Age, Washington, D.C.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



The map (above) displays the distribution of persons with disabilities by age. The percentage of children aged 5-17 with disabilities is highest in Wards 7 and 8, which are predominantly Black and have several R/ECAPs, and are low throughout the rest of D.C. Predominantly Black neighborhoods that are not low-income do not have concentrations of children with disabilities. Adults aged 18-64 with disabilities are also concentrated in the same areas, though the magnitude of the disparity is smaller. The same is true for elderly adults with disabilities, though the disparity is even smaller than for non-elderly adults.

**Table 3: Disability by Age, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

Age of People with Disabilities	Washington, D.C.		Washington-Arlington-Alexandria, DC-VA-MD-WV Region	
	Number	Percentage	Number	Percentage
Age 5-17 with Disabilities	5,164	0.90%	36,718	0.69%
Age 18-64 with Disabilities	39,154	6.84%	231,521	4.37%
Age 65+ with Disabilities	23,562	4.12%	178,259	3.37%

As reflected in the table above, similar to data reflecting the percentages of persons with different types of disabilities in D.C. and in the Region, there are higher concentrations of persons with disabilities in all age ranges in D.C. than elsewhere in the Region. The disparity is most significant for nonelderly adults. This might be due to better public transit options for working adults with disabilities in the District than elsewhere in the Region.

## 2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

**Table 4: Disability by Publicly Supported Housing Program Category, Washington, D.C. and Washington-Arlington-Alexandria, DC-VA-MD-WV Region**

Washington, D.C.	Number	Percentage
Public Housing	2,014	30.78%
Project-Based Section 8	1,028	10.75%
Other Multifamily	88	17.53%
HCV Program	2,754	23.59%
Washington-Arlington-Alexandria, DC-VA-MD-WV Region	Number	Percentage
Public Housing	2,656	27.83%
Project-Based Section 8	2,286	10.81%
Other Multifamily	573	28.45%
HCV Program	N/A	N/A

There is a significant shortage of affordable, accessible housing in a range of unit sizes in both D.C. and the Region. Although it is not possible to precisely gauge the number of individuals who need affordable, accessible units, the populations of individuals with ambulatory, hearing, and vision disabilities provide starting points. In D.C., as the table above shows, there are 5,884 households that include persons with disabilities that are residing in publicly supported housing. Among these households, there are many who have disabilities that do not require physical accessibility features. Additionally, nearly half of these households are Housing Choice

Vouchers holders who often reside in purely private housing (though some reside in Low Income Housing Tax Credit or inclusionary zoning units). Many of these private units, which are not subject to the accessibility provisions of Section 504 of the Rehabilitation Act requiring the housing provider to pay the cost of reasonable modifications, may not be accessible. It is important to emphasize that, particularly in more recent years, the District has utilized incentives in its Qualified Allocation Plan that result in more LIHTC units being accessible. For example, the District of Columbia gives 10 points to LIHTC applications that set aside 20% of funded units as permanent supportive housing or targeted affordable housing and in which at least 20% of those units are fully accessible. Across programs, accessible, affordable housing units are disproportionately likely to be one-bedroom units. This creates unique challenges for families including individuals with disabilities who need accessibility features and persons with disabilities who need the services of a live-in aide.

In comparison to this level of supply, there are 36,878 persons with ambulatory disabilities, 12,300 persons with hearing disabilities, and 13,453 persons with vision disabilities in D.C. Although it must be noted that these are not mutually exclusive categories and that not all people in these categories are low-income, this data reflects need far outstretching current supply. The problem is even more acute in the parts of the Region outside of D.C., as publicly supported housing units are intensely concentrated in D.C. while, despite some concentration in D.C., the vast majority of persons with disabilities in the Region do not reside in D.C.

- b. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?*

In D.C., affordable, accessible housing units are located in areas that follow the same patterns of concentration that persist with regard to affordable housing generally. Affordable housing in D.C., regardless of its accessibility or lack thereof, is disproportionately located in predominantly Black neighborhoods, including many R/ECAPs, as well as some neighborhoods that were once predominantly Black but that have undergone significant gentrification. This dynamic is slightly different with respect to units of affordable housing that the District has required developers to produce through inclusionary zoning. These units are in developments subject to the Fair Housing Act's accessibility requirements but not to the more rigorous requirements of Section 504. Unlike publicly supported housing units, inclusionary zoning units are heavily concentrated in gentrifying neighborhoods that have been the site of a significant volume of new multifamily residential development since 2009. These areas include parts of Wards 1, 2, 4, 5, and 6.

In the Region, publicly supported housing units that are accessible because of the protections of Section 504 are relatively well integrated into a variety of types of neighborhoods and are not concentrated in the relatively few R/ECAPs that exist outside of D.C. Publicly supported housing that is not located in areas of racial and ethnic minority population concentration tends to be located in high growth corridors, like the I-270 Corridor in Montgomery, County, Maryland and the parts of Reston, Herndon, and Sterling near Dulles Airport, and dense population centers like Rosslyn and Downtown Silver Spring. The very highest opportunity areas, including Potomac, Maryland, and Great Falls, Virginia, do not have significant amounts of publicly supported housing and thus have a limited supply of housing that is affordable and accessible due to Section 504. These are also areas that have relatively restrictive zoning. With respect to housing

that is affordable and accessible but is not subject to Section 504, given the use of inclusionary zoning in Fairfax County, Virginia, and Montgomery County, Maryland, high-growth corridors tend to have the greatest supply of relatively new, multifamily housing, some of which is affordable. These areas, also including Tysons Corner and Bethesda in addition to those referenced with respect to Section 504-accessible units, tend to be either relatively integrated or predominantly non-Hispanic White. By contrast, suburban areas that have larger Black and Hispanic populations, including in Prince George's County, Maryland and Prince William County, Virginia, have weaker inclusionary zoning protections, if any, and higher concentrations of detached single-family homes.

*c. To what extent are persons with disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?*

In D.C., where 11.7% of the population reports having a disability, persons with disabilities appear to be able to access public housing and Housing Choice Vouchers at rates that are at least commensurate with the portion of the income-eligible population that has disabilities. The same is not true with respect to Project-Based Section 8 units, in which the percentage of residents with disabilities is lower than the percentage of all D.C. residents that have disabilities and is presumably much lower than the percentage of the income-eligible population that has disabilities. The reason for this disparity is not clear. Because the Other Multifamily category includes several programs with very different purposes and because there are relatively few Other Multifamily developments in D.C., it is not clear that persons with disabilities face structural barriers to accessing that housing in D.C.

Regionally, the same patterns largely hold true, which is not surprising in light of the high percentage of the Region's public housing and Project-Based Section 8 units that are within D.C. A much higher percentage of residents of Other Multifamily housing in the Region has disabilities. This may reflect a higher proportion of Other Multifamily developments that are Section 811, which targets persons with disabilities, or Section 202, which targets elderly individuals who are disproportionately persons with disabilities, in the parts of the Region outside of D.C. Although HUD does not provide regional data reflecting the percentage of Housing Choice Voucher holders with disabilities, it does provide such data on a jurisdiction-by-jurisdiction basis for other CDBG recipients. The table below reflects those concentrations.

**Table 5: Housing Choice Voucher Holders with Disabilities by Jurisdiction**

Jurisdiction	Number of Persons with Disabilities	Percentage of Persons with Disabilities
Alexandria, VA	214	15.82%
Arlington County, VA	318	21.98%
Bowie, MD	17	20.00%
Fairfax County, VA	705	17.75%
Frederick, MD	173	22.47%
Fredericksburg, VA	78	31.20%
Gaithersburg, MD	101	17.32%
Loudoun County, VA	140	24.14%
Montgomery County, MD	1,141	16.78%
Prince George’s County, MD	866	16.57%
Prince William County, VA	442	19.95%

Of the 11 other entitlement jurisdictions in the Region, just two have greater proportional representation of persons with disabilities among their voucher holders than the District does. Additionally those two jurisdictions are among the smallest out of the 11 in terms of the total number of vouchers in use. This suggests that suburban public housing authorities may not be doing as much as the District of Columbia Housing Authority to prioritize serving persons with disabilities. At the same time, it should be noted that the overall concentration of persons with disabilities, 8.5%, is significantly lower Region-wide than it is in D.C.

The District also administers tenant-based rental assistance programs and other supportive housing assistance that specifically target persons with particular types of disabilities. Within these programs, there is no underrepresentation of persons with disabilities. The Department of Mental Health’s *Supportive Housing Strategic Plan, 2012-2017* reported that there were 675 Home First tenant-based vouchers available for persons with psychiatric disabilities, in addition to those provided through the Housing Choice Voucher Program, and that the District had funded project-based rental assistance for 121 units of permanent supportive housing for the same population. The Department of Disability Services also provides persons with developmental disabilities with rental assistance, though data on the number of individuals served is not available. Family members of individuals with developmental disabilities have reported difficulties in finding housing within D.C. for their loved ones with this assistance because payment standards are not as generous as they are for the Housing Choice Voucher Program. As a result, some individuals with developmental disabilities who are from D.C. reside in Prince George’s County, Maryland while receiving services funded by the District.

### **3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

- a. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

In D.C., persons with disabilities face hurdles in accessing integrated housing due to extremely high and rising housing costs despite some of the most extensive efforts to support community-

based living in the United States. With regard to persons with intellectual and developmental disabilities, the District has closed all of its publicly-run segregated settings, including the Forest Haven Children's Developmental Center in 1991, the D.C. Village Nursing Home, and the portion of St. Elizabeth's Hospital housing persons with intellectual and developmental disabilities, the latter two in 1994. There are no public or private facilities for persons with intellectual and developmental disabilities that house more than 15 adults. At the same time, the absence of large segregated settings does not imply the presence of integrated settings, and 15 is an inappropriately high cut-off point for determining whether a private facility is segregated. The heart of the problem of inadequate integrated housing for persons with intellectual and developmental disabilities is that there is an extreme shortage of affordable housing generally. This makes it difficult for individuals with tenant-based rental assistance to find units that are affordable to them. Accordingly, it is not surprising that the District of Columbia Rehabilitation Services Administration's partner survey indicated that just 45.8% of respondents said that housing was readily available to persons with disabilities.

With respect to persons with psychiatric disabilities, circumstances are broadly similar. On the one hand, the District has gradually reduced the number of persons with disabilities institutionalized at St. Elizabeth's Hospital, and the District has supported efforts by Pathways to Housing DC to connect individuals with psychiatric disabilities to integrated housing in accordance with a Housing First model. On the other hand, the level of support for permanent supportive housing and set-aside vouchers is not sufficient to ensure community integration. In the absence of efforts like those of Pathways to Housing DC being taken to scale, many individuals with psychiatric disabilities end up homeless, incarcerated, in psychiatric wards at local hospitals, or in nursing homes. Advocates have challenged this systemic breakdown with respect to the children's mental health system in the lawsuit *M.J. v. District of Columbia*, a putative class action which is pending in federal court.

D.C. currently has 99 community residential facilities for people with psychiatric disabilities, which have a combined capacity of 666 beds. These facilities are not as segregated as institutions like hospitals and nursing homes, but are not as integrated as permanent supportive housing. The average capacity, at nearly seven beds, is large. Often, group homes with four or fewer beds are considered small, and those with five or more are considered large. One problem with the majority of these group homes – and with not having group homes in areas with multifamily housing in addition to areas with single-family homes – is that they are not accessible to persons with physical disabilities. Many residents of D.C. have co-occurring physical and psychiatric disabilities.

In the broader Region, the lack of community integration is even more acute. In 2012, the Commonwealth of Virginia entered into a consent decree with the U.S. Department of Justice with respect to allegations that the Commonwealth discriminated against persons with intellectual and developmental disabilities in violation of the Americans with Disabilities Act by failing to serve them in integrated settings. Virginia's implementation of its obligations under the consent decree has been sporadic, and many individuals who have left institutions have ended up in group homes rather than in independent apartments. Nonetheless, the integration of persons with intellectual and developmental disabilities in Virginia has increased significantly in recent years as a result of the litigation and policy changes across multiple agencies that were made in order to facilitate implementation. The segregation of persons with psychiatric disabilities in

Virginia, however, has barely budged, as the Commonwealth has not made the kinds of transformative changes in that respect.

- b. Describe the range options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

Intensive home and community-based services and supports are available to persons with disabilities in D.C. through multiple Medicaid-funded programs. Medicaid State Plan services are available for individuals with psychiatric disabilities. On June 3, 2019, the D.C. Department of Health Care Finance submitted an application for the federal Center for Medicare and Medicaid Services for its Section 1115 Medicaid Behavioral Health Transformation Demonstration Program. Among other changes, the demonstration would expand crisis stabilization and mobile outreach services, provide comprehensive recovery support services including peer supports, add coverage for psychologists and licensed clinical social workers, and provide expanded supported employment services.

For individuals with developmental disabilities, the Home and Community Based Services Waiver provides among the most well-funded services to aid people in living in integrated settings of any jurisdiction in the country. Additionally, unlike the vast majority of states, D.C. has no waiting list for Home and Community Based Services Waiver services. Those who are eligible are able to receive services. The Elderly and Persons with Physical Disabilities Waiver is the third key program for providing community-based supportive services in a manner that prevents unjustified institutionalization.

The range of integrated housing options for persons with disabilities who need supportive services is discussed above in connection with Question 2(c) of this section.

#### **4. Disparities in Access to Opportunity**

- a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*
  - i. Government services and facilities*

D.C. has a dedicated Office of Disability Rights that provides a number of services to increase accessibility throughout the District. The office provides ADA training, braille services interpretation, captioning and transcription services, technical assistance, and sign language services, to name a few. Agencies within relevant committees on the D.C. Council also work to improve disability services. Most pages have ReadSpeak available, as well as the option to access online services such as 311 calls, data requests, and complaints and appeals. The Department on Disability Services also provides more specific information on how to access disability services throughout the District. The Office of Disability Rights notes that the district is required to make new construction ADA compliant, and that District services, programs and activities must be accessible to all people with disabilities.

Information on how to reach 911 for the hearing-impaired is available on the D.C. government website. 911 is accessible to the hearing-impaired, as the service accepts TDD calls.

*ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)*

Project Sidewalk is an initiative meant to improve sidewalks and crossings for those with ambulatory disabilities in the larger D.C. metropolitan region.<sup>258</sup> Over 70% of the District has had its accessibility points and concerns mapped, and this information can be used to help improve areas of concern in the future. Walk Score rates D.C.'s Walk Score 77 out of 100, indicating that the District is mostly walkable. Its Transit Score is 71 and its Bike Score 67, rating the WMATA and biking system highly, too. Information on how to register concerns about infrastructure is readily available on the DC.gov website.

*iii. Transportation*

D.C. is served by the MetroAccess Paratransit system, which provides door-to-door transportation to individuals whose disabilities do not allow them to use bus or rail. In February 2019, the latest month for which data was available, 186,650 trips were scheduled of 258,731 total requests<sup>259</sup>. Paratransit trips became more restricted and expensive in 2017 in response to the need for cost-cutting measures.

Buses in the District can kneel to accommodate passengers with ambulatory disabilities. That being said, some bus stops served by the WMATA don't have curb cuts, which makes it difficult for those using wheelchairs to access the stops.

Metro stations come equipped with elevators to assist those with ambulatory disabilities using the metro. However, many of these elevators are slower and run-down. WMATA announces to metro passengers when they are riding 7000 Series trains because these models pose safety risks to those with visual disabilities. The 7000 Series trains have rubber barriers between railcars that assist those walking between cars, but pose a safety risk to visually impaired passengers. This information, however, is not announced to visually impaired passengers at the station and poses a risk to uninformed passengers with visual disabilities. On the same note, while flickering lights are meant to signal evacuation to hearing-impaired individuals on the metro, they too must already be familiar with the signal to understand the cue. At the time of writing, eight elevators were out of service or undergoing maintenance on the D.C. Metro, which is indicative of ongoing concerns about whether metro stops are consistently accessible to those with ambulatory disabilities.

Overall, transportation could be improved by consistent maintenance of roadways, sidewalks, and Metro and bus stops.

*iv. Proficient schools and educational programs*

Information on determining if students need special education is available online at the District of Columbia Public Schools website. The Office of the State Superintendent of Education will provide resources to parents, families and educators, as well as information on transporting

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<sup>258</sup> <https://dc.curbed.com/2017/10/17/16488310/project-sidewalk-accessibility-map>

<sup>259</sup> [https://www.wmata.com/service/accessibility/metro-access/upload/Monthly\\_Reports\\_FY19.pdf](https://www.wmata.com/service/accessibility/metro-access/upload/Monthly_Reports_FY19.pdf)

students with disabilities to and from school. The Office may also help with placement of students in nonpublic educational settings. Overall, public schools do appear to provide necessary resources to those with disabilities, and will work with students and parents to find an appropriate path forward.

A FOIA request from 2016 revealed that at the time, over two-fifths of D.C. public schools had had at least one infrastructure issue with accessibility recently. Although the ADA allows for schools to provide alternative access to programs instead of improving infrastructure, this can still negatively impact the quality of an individual with disability's education.

#### *v. Jobs*

D.C. is an Employment First State, meaning that it aims to incorporate those with disabilities into the employment market. D.C. promotes employment for those with disabilities in a number of ways, including partnerships with programs and organizations that assist disabled people in finding employment. It also provides services for work readiness, occupational training, RSA supported employment, and employment retention for those who develop disabilities. Employers in the state are generally willing to adapt to the needs of disabled persons and will provide accommodations. Jobs in a range of fields and skill levels are available to those with disabilities.

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

The District's official website lists a range of ways to inform and assist disabled persons with accommodations and accessibility modifications. The website also uses ReadSpeaker for those with visual disabilities using the website. 311 requests can be made online as well as by phone. The District's Department on Disability Services and Office of Disability Rights, however, are the two bodies most involved in everyday accessibility and accommodation needs. The Department on Disability Services provides information related to housing, employment, and emergency services. The Office of Disability Rights provides information on the legal rights endowed to those with disabilities by the federal and state/local governments. It also helps with services such as captioning, sign language, ADA training, etc. when interacting with District agencies.

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.*

According to CHAS data derived from the 2011-2015 American Community Survey, 38.0% of households that include persons with disabilities reside in owner-occupied units. By contrast, 42.0% of households that do not include persons with disabilities reside in owner-occupied units. This disparity is small but would likely appear to be more significant if it could be adjusted for age. CHAS data does not include these crucial data points for the broader region. Additionally, this Assessment did not reveal any local studies on homeownership among people with disabilities or lending discrimination against people with disabilities in D.C. The disproportionately low incomes of persons with disabilities likely make homeownership less attainable but may not explain all disparities. In other locations, industry practices that have

reduced homeownership opportunities for persons with disabilities have included, but have not been limited to, failing to count disability income for purposes of qualifying homebuyers for mortgage loans and physical inaccessibility among housing types that are more likely to be available for-sale.

## **5. Disproportionate Housing Needs**

- a. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

According to CHAS data derived from the 2011-2015 American Community Survey, in D.C., 49.5% of households including persons with disabilities experience one or more housing problems. By contrast, just 35.6% of households that do not include persons with disabilities experience housing problems. Similar to with housing tenure as discussed above, CHAS data does not include these data points for the broader region.

## **6. Disability and Access Issues Contributing Factors**

### Access for persons with disabilities to proficient schools

Lack of access for persons with disabilities to proficient schools is a significant contributing factor to disparities in access to opportunity for persons with disabilities in the District of Columbia. There are 111 D.C. Public Schools (DCPS) schools and 115 public charter schools within the District, in addition to 51 private or parochial schools in the District. Accessibility in schools is evaluated using the Individuals with Disabilities Education Act, which further requires all states and the District of Columbia to assess accessibility standards in public schools yearly. The latest report available is from 2016.

The report indicates that DCPS schools are generally not meeting their education goals for individuals with disabilities. Though the target graduation rate for those with Individualized Education Programs (IEPs) was 54.8%, the actual rate was 49.51%. This was after the rate had been reduced from 85% in 2012 and before.<sup>260</sup> The Office of the State Superintendent of Education also reported that in the 2015-2016 school year, five of its districts had significant discrepancies in suspension and expulsion by race and ethnicity, though none were found to have policies, procedures and practices contributing to these discrepancies. 83.6% of parents of children receiving special education services were generally satisfied with both their involvement and the services provided to their students. In the 2017-2018 school year, students

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<https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/FFY%202016%20Annual%20Performance%20Report-%20Part%20B.pdf>

with disabilities were 1.83 times more likely to receive an out-of-school suspension than were students without disabilities.

The District can also do more to ensure that its schools are accessible. A 2016 FOIA request found that 40% of DCPS schools have infrastructure-related accessibility concerns.<sup>261</sup> While these schools may still be ADA compliant because they offer program accessibility, more attention still needs to be paid to infrastructure concerns.

In recent years, D.C. has not fulfilled its Child Find identification process. While this process is meant to ensure that children with disabilities who would otherwise be too young to school are identified and have IEPs, a federal court ruling in 2016 found that D.C. is not fulfilling these obligations.<sup>262</sup> Since this lawsuit, DCPS has averaged Child Find values of above 90%, though its target is 100%.<sup>263</sup>

School accessibility does not appear to be a major issue in the broader Region surrounding the District, based on available reports.

#### Access to publicly supported housing for persons with disabilities

Access to publicly supported housing for persons with disabilities is a high priority contributing factor to segregation and disproportionate housing needs in the District of Columbia and in the broader region. The broader affordable housing crisis in the District disproportionately harms persons with disabilities whose households, on average, have lower incomes than households that do not include persons with disabilities. This means that the level of need for publicly-supported housing among persons with disabilities is higher than their proportion of the overall population. Although the District has created targeted affordable housing programs that specifically target persons with disabilities, these programs have not been sufficient to meet the total need. Additionally, at least one of these programs, that of the Department of Disability Services for persons with intellectual and developmental disabilities, does not authorize rents that are sufficient to access all but the lowest income neighborhoods in the District and that often result in individuals moving to Prince George's County, Maryland. This is a problem that could be addressed through increased payment standards for that program. Alternatively, the District of Columbia Housing Authority could create remedial admissions preferences for persons with intellectual and developmental disabilities, who are at risk of institutionalization. Lastly, although not technically subsidized, persons with disabilities appear to be having difficulty accessing affordable units in Inclusionary Zoning developments.

In the surrounding areas of Maryland and Virginia, the problem is much more dire. First, suburban jurisdictions have much less publicly-supported housing than the District does,

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<sup>261</sup> <https://www.washingtoncitypaper.com/news/city-desk/blog/20827194/foia-about-40-percent-of-all-dc-public-schools-have-an-accessibility-issue>

<sup>262</sup> [https://www.washingtonpost.com/local/education/court-rules-dc-does-not-provide-ample-services-to-young-children-with-disabilities-court-rules/2016/06/24/da2781e4-3a34-11e6-a254-2b336e293a3c\\_story.html?utm\\_term=.00608c945756](https://www.washingtonpost.com/local/education/court-rules-dc-does-not-provide-ample-services-to-young-children-with-disabilities-court-rules/2016/06/24/da2781e4-3a34-11e6-a254-2b336e293a3c_story.html?utm_term=.00608c945756)

<sup>263</sup> [https://www.washingtonpost.com/local/education/court-rules-dc-does-not-provide-ample-services-to-young-children-with-disabilities-court-rules/2016/06/24/da2781e4-3a34-11e6-a254-2b336e293a3c\\_story.html?utm\\_term=.00608c945756](https://www.washingtonpost.com/local/education/court-rules-dc-does-not-provide-ample-services-to-young-children-with-disabilities-court-rules/2016/06/24/da2781e4-3a34-11e6-a254-2b336e293a3c_story.html?utm_term=.00608c945756)

regardless of occupancy. Second, households including persons with disabilities tend to comprise a smaller percentage of suburban public housing authorities' Housing Choice Voucher holders than they do in the District. Third, targeted programs, such as the tenant-based rental assistance for persons with intellectual and developmental disabilities that the Commonwealth of Virginia created as a result of its *Olmstead* settlement with the U.S. Department of Justice, serve fewer people across much larger geographies than do the District's programs.

#### Access to transportation for persons with disabilities

Access to transportation for persons with disabilities is a significant contributing factor to Disability and Access. The District Department of Transportation runs services including Capital Bikeshare, D.C. Streetcar, and the D.C. Circulator, and the Washington Metropolitan Area Transit Authority runs the Metrorail and Metrobus. WMATA's services, as well as Capital Bikeshare and several county or citywide bus services and regional commuter rail, serve the broader Region. These regional services' record on accessibility is broadly similar to that of District services.

Most metro and bus services have some accessibility information prominently displayed on their websites. The D.C. Circulator website lists accommodations for passengers using wheelchairs and mobility scooters, including kneeling functionality, ramps and lifts as well as wheelchair securement areas. Operators also announce intersections and transfer points on buses, and follow stop buttons located in priority seating areas for persons with disabilities. The D.C. Streetcar service has similar accommodations. Metrobus services also include kneeling, ramps, lifts, accessibility signage, priority seating and securement areas for people with disabilities, and visual displays and audio announcements of transfer points and intersections. In addition, Metrobus operators are required to take part in ADA Customer Service Training.

The Metrorail features priority parking spaces near rail station entrances, accessibility signage (including in Braille), fare vending machines that have lower panels, Braille and audio instructions, extra-wide and accessible faregates, TTY-equipped telephones, and Passenger Information Display Systems (PIDS). Bumpy tiles and flashing lights along the edge of rail platforms inform customers with visual or auditory impairments that they are near the edge or that a train is approaching. The Metro has elevators available at all rail stations. Rail cars have been modified to reduce the gap between the platform and the rail car, and barriers between the cars alert customer with visual impairments that they are not in rail cars. Cars include priority seating for people with disabilities, and emergency intercoms at each end of railcars. Additionally, all 91 Metro stations connecting the Region to the District are accessible.

The WMATA also offers paratransit services in the form of MetroAccess. These services can be booked online or by phone, so long as users have a MetroAccess customer ID. Users must also submit documentation of their disability and take part in an in-person interview in order to qualify for these services. Once deemed eligible, users can also book with Regency Taxi and Silver Cab for discounted rates. MetroAccess is limited though in the broader region: trips must

begin or end within three-quarters of a mile of a nearby Metro stop, which can limit a person with disabilities' access to the broader transit system.<sup>264</sup>

Private transportation services, by contrast, have a much more checkered record on accessibility. Uber is the defendant in pending litigation alleging systemic violations of the ADA in the District of Columbia.

### Inaccessible government facilities or services

Inaccessible government facilities or services contribute to disparities in access to opportunity for persons with disabilities. Although a variety of public facilities and services have reasonable accommodation policies for persons with disabilities, many facilities and services require additional outreach or efforts by the person with a disability to request accommodations themselves rather than having them integrated into the services from the initial interaction.

D.C. Public Libraries maintains an accessibility statement on their webpage that gives information on requesting accommodation for meetings and other library-hosted events.<sup>265</sup> Libraries also provide appointments for free training and classes on different adaptive technologies, as well as American Sign Language interpreters for programming and classes for all skill-levels.<sup>266</sup> Individuals with disabilities who are unable to come to the libraries can participate in the Library Services At-Home Readers (L-STAR) program, which provides library materials to homebound persons.<sup>267</sup> Further, D.C.'s Talking Book and Braille Library provides materials for persons who cannot read standard print as a result of their disability status.<sup>268</sup>

D.C.'s government web portal maintains a page on requesting accommodations and making their website ADA-compliant.<sup>269</sup> However, there are some issues with the accessible web presence. At present, users cannot access the Listen Function through ReadSpeaker, although highlighting text on the webpages does allow a person to convert the highlighted text to audio.<sup>270</sup> Further, D.C.'s Office of Disability Rights provides free trainings on the ADA and local disability laws and regulations to D.C. agencies and other organizations, as well as captioning and transcription services for D.C. government agencies.<sup>271</sup>

Further, D.C.'s various government agencies, with the exception of the District Department of Transportation,<sup>272</sup> do not have readily-accessible, public ADA Transition Plans hosted on their websites.

In the Region, some counties provide a range of accessibility services. Montgomery County has an ADA Compliance Team and provides training and technical assistance for County staff on

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<sup>264</sup> <https://wamu.org/story/18/02/12/cars-metro-arent-enough-washingtonians-get-creative/>

<sup>265</sup> <https://www.dclibrary.org/node/2095>

<sup>266</sup> <https://www.dclibrary.org/node/5886>; <https://www.dclibrary.org/node/2407>

<sup>267</sup> <https://www.dclibrary.org/node/2663>

<sup>268</sup> <https://www.dclibrary.org/node/2483>

<sup>269</sup> <https://dc.gov/page/dcgov-accessibility-policy>

<sup>270</sup> <https://dc.gov/node/315552>

<sup>271</sup> <https://odr.dc.gov/service/ada-training>; <https://odr.dc.gov/service/captioning-and-transcription-services>

<sup>272</sup> <https://ddot.dc.gov/publication/ddot-ada-transition-plan-public-right-way-draft>

ADA compliance and other disability needs. Similarly, Fairfax County provides ADA services through its government offices, including enforcing building codes that require ADA compliance and handling ADA complaints. However, ADA Transition Plans were not available for these counties.

### Inaccessible public or private infrastructure

Inaccessible public or private infrastructure contributes to disparate access for persons with disabilities in D.C. Although accommodations are available in a range of public and private infrastructure, lack of compliance or maintenance results in inequitable treatment for persons with disabilities.

#### A. Monuments and cultural institutions

All of D.C.'s cultural monuments and institutions are accessible. The National Mall provides permit-only parking next to the FDR Memorial for accessibility<sup>273</sup>, and a portion of D.C. Museums (e.g. Library of Congress, Smithsonian) have online summaries of facility features accommodating different disabilities.<sup>274</sup> For example, the National Gallery of Art segments accessibility information into pages dedicated for different type of disability<sup>275</sup>, and the Library of Congress provides "Touch History" Tours.<sup>276</sup> There appear to be no public accounts of accessibility problems at these sites.

#### B. Public space

Advocates have noted that inadequate sidewalks can impede accessibility for persons with disabilities.<sup>277</sup> No online information was available on the condition of D.C. sidewalks and their impact on persons with disabilities, and recent projects, such as Project Sidewalk, endeavor to map sidewalk accessibility by noting curb ramp conditions, lack of sidewalks, and other common issues impeding mobility in D.C.<sup>278</sup> Weather hazards intersect with disability mobility in public and private infrastructure. Under D.C. local law, public and private property owners are responsible for clearing the sidewalk fronting and abutting their properties.<sup>279</sup> Failure by these entities to do so can result in blocked curb cuts and impassable sidewalks.<sup>280</sup> Parking of dockless scooters and bicycles has also resulted in impassable sidewalks, particularly in Downtown D.C. The greater D.C. Region also has access to the District through its Metro, as all 91 stations on the D.C. Metro are accessible.

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<sup>273</sup> <https://washington.org/dc-information/washington-dc-disability-information>

<sup>274</sup> <https://www.si.edu/Visit/VisitorsWithDisabilities>

<sup>275</sup> <https://www.nga.gov/visit/accessibility.html>

<sup>276</sup> <https://www.loc.gov/accessibility/>

<sup>277</sup> <https://www.ndrn.org/resource/national-infrastructure-week-2019/>

<sup>278</sup> <https://sidewalk.cs.washington.edu/>

<sup>279</sup> D.C. Code Ann. § 9-601 (West).

<sup>280</sup> [https://wamu.org/story/16/02/01/wheelchair\\_users\\_say\\_they\\_are\\_forgotten\\_in\\_blizzard\\_cleanup\\_efforts/](https://wamu.org/story/16/02/01/wheelchair_users_say_they_are_forgotten_in_blizzard_cleanup_efforts/)

### Lack of affordable in-home or community-based supportive services

Lack of affordable in-home or community-based supportive services is a medium priority contributing factor to the segregation of persons with disabilities in D.C. and is an even more pervasive problem elsewhere in the Region. The District has funded home and community-based services for important populations, such as persons with psychiatric disabilities, persons with intellectual and developmental disabilities, and older individuals and persons with physical disabilities at higher per-capita levels than in the vast majority of states (and in some instances, all states). As a result of this commitment, unlike in most states, there are no waiting lists for receiving home and community-based services. Additionally, available services are, with some exceptions, generally robust enough to facilitate stable, long-term community integration for people who have particularly complex needs. The exceptions, however, are important. In *M.J. v. District of Columbia*, advocates have alleged that the District does not have a system for delivering intensive, community-based services to children with psychiatric disabilities over extended periods of time. In the adult mental health system, there have been complaints that supportive services have not been as robust in practice as they purport to be on paper. The results, at worst, can include contact with the criminal justice system and conflicts with neighbors that may lead to eviction. These types of problems exist in the balance of the Region, as well, and are compounded there by waiting lists to receive services and inadequate billing rates for services that push individuals toward group homes.

### Lack of Affordable, Accessible Housing in Range of Unit Sizes

Lack of affordable, accessible housing units in a range of sizes is a significant contributing factor to disproportionate housing needs and segregation for persons with disabilities.

According to American Community Survey data, 17.4% of all households in D.C. live below the federal poverty line.<sup>281</sup> Of households where at least one member had a disability, 32.1% lived below the poverty line.<sup>282</sup> Homelessness among this population is also quite stark—based on the 2017 Point-in-Time Count, 14.4% of all persons experiencing homelessness had some form of physical disability.<sup>283</sup> Homelessness is one of the repercussions of limited accessible housing. For vulnerable households such as these, access to housing can be particularly complicated. D.C.’s Housing Authority prioritizes available units for people with mobility impairments who are heads of households and allows “reasonable modifications,” in compliance with the Fair Housing Act and Section 504 of the Rehabilitation Act, to alter units to meet the needs of occupants with disabilities.<sup>284</sup> But, for many persons with disabilities, cost is still a significant barrier. One report noted a person who relied on Social Security Income (SSI) to supplement their housing costs would have to pay 196% of their monthly income to rent a studio in D.C.<sup>285</sup> New multifamily housing in the District, which is more likely to be accessible than other

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<sup>281</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

<sup>282</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

<sup>283</sup> “2018 Point-in-Time Count of Persons Experiencing Homelessness in the District of Columbia,” The Community Partnership for the Prevention of Homelessness, 2018.

[https://dhs.dc.gov/sites/default/files/dc/sites/dhs/page\\_content/attachments/Fact%2BSheet%2B2018.pdf](https://dhs.dc.gov/sites/default/files/dc/sites/dhs/page_content/attachments/Fact%2BSheet%2B2018.pdf)

<sup>284</sup> <https://www.dchousing.org/topic.aspx?topicid=38&AspxAutoDetectCookieSupport=1>

<sup>285</sup> <https://equalrightscenter.org/wp-content/uploads/click-to-visit-report-final.pdf>

housing, disproportionately consists of studios and one-bedroom units that may not be able to accommodate families that include persons with disabilities or persons with disabilities who have live-in aides. Additionally, plans for the redevelopment of major publicly supported housing developments such as Barry Farm and Brookland Manor have provided for reduced numbers of units with several bedrooms.

In the greater Region, the affordable housing landscape could begin to change, as Amazon recently announced a \$3 million gift to the Arlington Community Foundation to invest in affordable housing initiatives. In Virginia overall, data shows that affordable units are generally farther away from the District, as the darker blue, more affordable units on the below map indicate.<sup>286</sup>

#### Lack of affordable, integrated housing for individuals who need supportive services

Lack of affordable, integrated housing for individuals who need supportive services is a high-priority contributing factor to segregation and disproportionate housing needs for persons with disabilities in the District of Columbia and the broader Region. Housing costs in the District and throughout much of the Region are extraordinarily high. These costs undermine the effectiveness of the extensive efforts that the District of Columbia has made to provide housing assistance to persons with disabilities as well as the more modest efforts of surrounding jurisdictions. When housing costs are high, each individual voucher or other unit of tenant-based rental assistance does not go as far, precipitating a conflict between the goal of serving as many people as possible and affording individuals a broad range of neighborhood options. For persons with developmental disabilities, the problem is so severe that many individuals from D.C. have moved to Prince George's County, Maryland.

One additional problem is that some programs that provide housing for persons with disabilities are not accommodating of persons with multiple disabilities. For example, the vast majority of the District's group homes for individuals with psychiatric disabilities are not accessible to people who use wheelchairs or other mobility devices. Although these group homes, particularly larger ones with five or more residents, are not paragons of community integration, lack of access to these facilities can still result in segregation when persons with co-occurring psychiatric and ambulatory disabilities have to reside in nursing homes for lack of other options.

#### Lack of assistance for housing accessibility modifications

Lack of assistance for housing accessibility modifications is not a significant contributing factor to fair housing issues in D.C. and the broader Region. Through its Single Family Residential Rehabilitation Program, the D.C. Department of Housing and Community Development provides grants of up to \$30,000 to individuals with disabilities and elderly individuals for housing accessibility modifications. The program is administered through contracts with four community-based organizations that have deep connections with the disability community across D.C. Similar programs with varying details operate across suburban local governments in suburban Maryland and Virginia. Multiple jurisdictions jointly fund Rebuilding Together

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<sup>286</sup> <https://smartasset.com/mortgage/how-much-house-can-i-afford#virginia>

Arlington/Fairfax/Falls Church to assist homeowners with accessibility modifications, and the Montgomery County Design for Life tax credit provides assistance, as well.

### Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing

Lack of assistance for transitioning from institutional settings to integrated housing is medium priority contributing factor to the segregation of persons with disabilities in D.C. and the broader Region. Stakeholders indicated that transition services for persons with psychiatric disabilities lag behind those available for persons with intellectual and developmental disabilities, with less stable housing tenure in integrated settings being the result. Additionally, there is a large population of individuals with psychiatric disabilities living in group homes, including some large group homes, that may not be institutions but that are not entirely integrated. There is a need to have more proactive case management with respect to individuals living in group homes that informs them of more integrated housing opportunities. In the broader Region, although the Commonwealth of Virginia has increased the transition services offered to persons with intellectual and developmental disabilities as a result of its *Olmstead* settlement with the U.S. Department of Justice, such services for persons with psychiatric disabilities are not as adequate. Maryland continues to have long waiting lists for home and community-based services rendering lack of transition assistance, while still important, a comparatively lower priority concern.

### Location of Accessible Housing

Location of accessible housing is a significant contributing factor to segregation and disparities in access to opportunity for persons with disabilities. Although it is not possible to precisely map the location of accessible housing within D.C., proxies, such as the age of multifamily housing and the presence of publicly supported housing, can reveal some of the issues individuals may face in identifying and accessing affordable housing. As noted in other sections, the vast majority of D.C.'s publicly supported housing stock is located east of Rock Creek Park with particularly heavy concentrations in Wards 7 and 8. New market-rate multifamily development tends to be concentrated near the center of the District. Areas of the District with concentrations of new multifamily housing do afford opportunities to their residents; however, access to certain types of opportunity, particularly access to proficient schools, remains concentrated west of Rock Creek Park. In the Region, accessible housing is difficult to find. An analysis of impediments found Prince George's County did not check that public-housing authorities followed ADA accessibility guidelines from 1993 to 2012. There are some innovative approaches, however. In Montgomery County, a single-family homeowner can write off the cost of accessibility modifications on their property taxes.

### Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. Loss of affordable housing is a significant contributing factor to Disability and Access.

## Regulatory barriers to providing housing and supportive services for persons with disabilities

### *Zoning for Community Residences for People With Disabilities*

Thirty years ago the Fair Housing Amendments Act of 1988 (FHAA) went into effect and added people with disabilities to the classes protected by the nation's Fair Housing Act (FHA). The amendments recognized that many people with disabilities need a community residence (group home, halfway house, recovery community) in order to live in the community in a family-like environment rather than being forced into an inappropriate institution. The FHAA's legislative history stated that:

“The Act is intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice within the community.”<sup>287</sup>

While some suggest the FHAA prohibits all zoning regulation of community residences, the FHAA's legislative history suggests otherwise:

49. “Another method of making housing unavailable has been the application or enforcement of otherwise neutral rules and regulations on health, safety, and land-use in a manner which discriminates against people with disabilities. Such discrimination often results from false or over-protective assumptions about the needs of handicapped people, as well as unfounded fears of difficulties about the problems that their tenancies may pose. These and similar practices would be prohibited.”<sup>288</sup>

Many states, counties, and cities across the nation continue to base their zoning regulations for community residences on these “unfounded fears.” The 1988 amendments require all levels of government to make a *reasonable accommodation* in their zoning rules and regulations to enable community residences for people with disabilities to locate in the same residential districts as any other residential use.<sup>289</sup>

It is well settled that a community residence is a residential use, not a business. The Fair Housing Amendments Act of 1988 specifically invalidates restrictive covenants that would exclude community residences from a residential area. The Fair Housing Act renders them unenforceable against community residences for people with disabilities<sup>290</sup>.

The core essence of a community residence for people with disabilities is to emulate a biological family (staff in the parental role and residents in the role of siblings) and to foster the normalization and community integration of the residents. Key to achieving these ends is using

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<sup>287</sup> H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173

<sup>288</sup> *Ibid.*

<sup>289</sup> 42 U.S.C. §3604(f)(B) (1988)

<sup>290</sup> H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2184.

nondisabled neighbors as role models. For community residences to achieve these ends, it is crucial that they be located in “normal,” safe residential neighborhoods and not clustered together or concentrated which can recreate an institutional setting.<sup>291</sup>

Clustering several community residences on a block or concentrating them in a neighborhood undermines opportunities to interact with and use neighbors without disabilities as role models. Clustering and concentrating community residences can also turn a block or neighborhood into a *de facto* social service district.

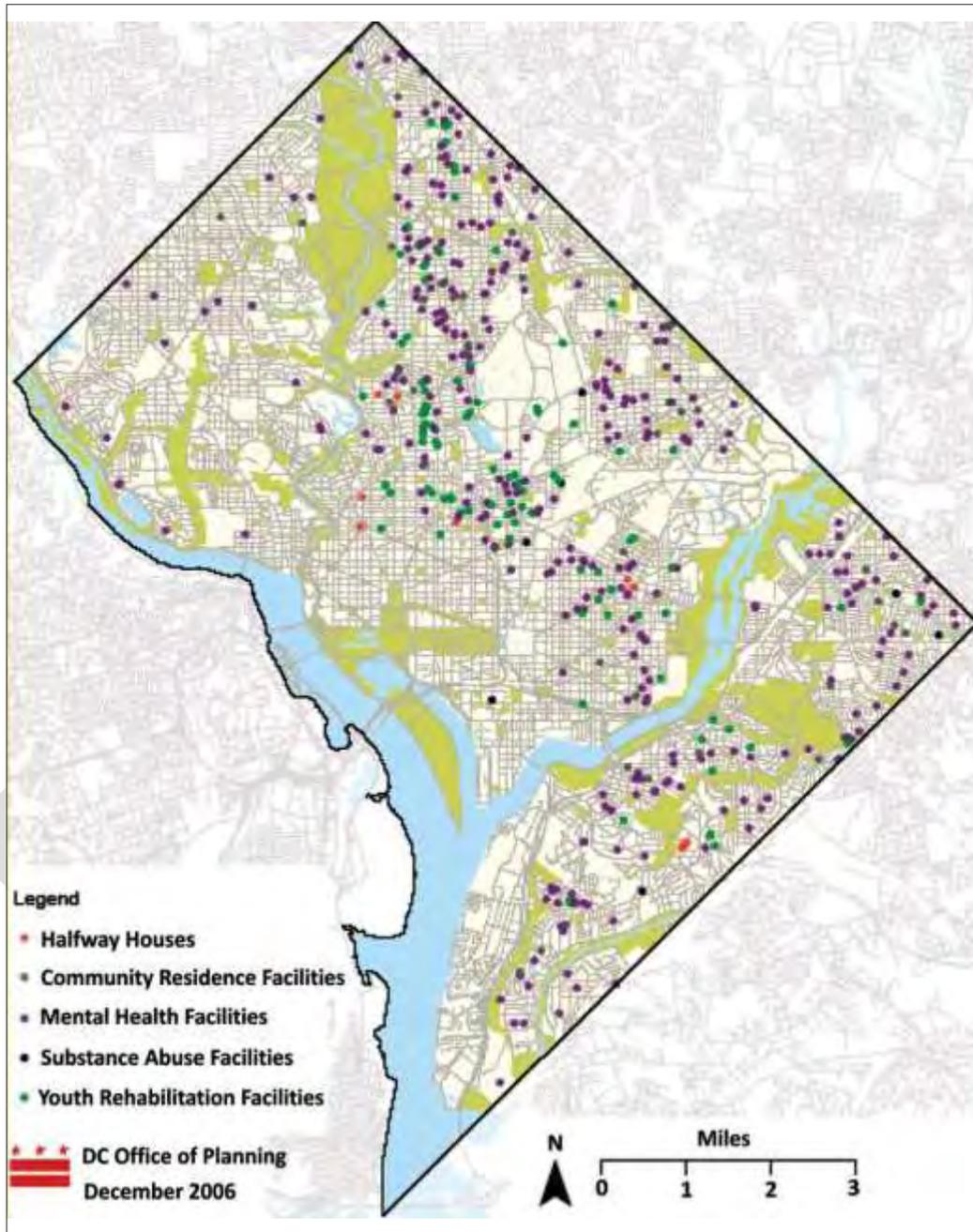
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<sup>291</sup> Explaining these principles can take quite a few pages. For a detailed explanation, see Daniel Lauber, *Pompano Beach, Florida: Principles to Guide Zoning for Community Residences for People With Disabilities* (River Forest, IL: Planning/Communications, June 2018) 6, 9–12, 14–15.

The most recent legible map showing the locations of community residences in the District of Columbia is from December 2006 and shown below.

*Locations of Community Residences in the District of Columbia: December 2006*



While nobody in the District has been able to provide a count of community residential facilities nor a list of them, the District did provide a legible map showing their locations — from late 2006.<sup>292</sup> The vast majority of community residences appear to be located in predominantly

<sup>292</sup> This map is much more legible than more recent maps which, incidentally, show the same pattern.

African–American neighborhoods. Only about 30 community residences are located in the District’s predominantly Caucasian and wealthy Northwest Quadrant. In contrast, each of the other quadrants hosts scores of community residences. The map from the District’s 2007 comprehensive plan shows severe concentrations in the Northeast and Southeast quadrants that *may* have already become, *de facto* social service districts. These concentrations can undermine the ability of a community residence to achieve normalization and foster community integration, the two lynchpins of the community residence concept.

These segregative patterns developed under previous versions of the District’s zoning code. The current code, adopted in 2016, *appears* to be more receptive to community residences for people with disabilities than its predecessors. However, as explained below, the code is so difficult to understand that the authors of this report and city zoning professionals are not sure exactly how it regulates community residences for people with disabilities. The analysis that follows reviews the current zoning code.

Typically, a city’s zoning ordinance places a cap on the maximum number of unrelated people allowed to live together in a single dwelling unit.<sup>293</sup> For example, many zoning codes set four as the cap on the number of unrelated people who can reside together. Without zoning provisions that make a reasonable accommodation to allow community residences for more than four unrelated individuals with disabilities, community residences for more than four people would be excluded from the residential districts where they belong.<sup>294</sup>

If a proposed community residence complies with the cap in a zoning code’s definition of “household” or “family,” any community residence that abides with that cap must be allowed as of right as a permitted use. The courts have made it abundantly clear that imposing any additional zoning requirements on a community residence that complies with the cap in the definition of “household” would clearly constitute illegal discrimination under the Fair Housing Act. When a definition of “household” places no limit on the number of unrelated individuals who can dwell together, then all community residences must be allowed as of right in all residential districts.<sup>295</sup>

When a proposed community residence would house *more* unrelated people than the definition of “household” allows, jurisdictions must make the “reasonable accommodation” that the Fair Housing Act requires to allow such community residences to locate in residential districts. However, different types of community residences have dissimilar characteristics that warrant varying zoning treatment depending on the type of tenancy.

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<sup>293</sup> The U.S. Supreme Court sanctioned this type of restriction in *Village of Belle Terre v. Borass*, 416 U.S. 1 (1974) and later modified its ruling in *Moore v. City of East Cleveland, Ohio*, 431 U.S. 494 (1977).

<sup>294</sup> The vast majority of community residences for people with disabilities house more than four people. While the trend for people with developmental disabilities is towards smaller group home households, valid therapeutic and financial reasons result in community residences for people with mental illness and for people in recovery from drug and/or alcohol addiction housing eight to 12 residents.

<sup>295</sup> See also *Marbrunak, Inc. v. City of Stow, Ohio*, 974 F.2d 43 (6th Cir. 1992).

Community residences that offer a relatively permanent living arrangement in which there is no limit to how long somebody can live there (group homes and sober living homes<sup>296</sup>) should be permitted uses allowed as of right in all zoning districts where single-family or multi-family residences are allowed as of right. It is now pretty well accepted that zoning may establish a spacing distance between community residences to facilitate their core purposes of normalization and community integration and require a state or local license to protect the residents from abusive treatment and exploitation.<sup>297</sup>

On the other hand, community residences such as a halfway house that sets a limit on length of residency are more akin to multifamily housing and may be subject to the heightened scrutiny of a special use permit (a “special exception” in D.C.) in single-family districts. Halfway houses impose a limit on how long residents can live there. Tenancy is measured in months. There is little doubt that they should be allowed as of right in multifamily districts.

Any examination of a city’s zoning treatment of community residences must begin with its zoning definition of “household” or “family.” In 2016 the District totally rewrote its zoning code and replaced the definition of “family” with this definition of “household:”

50. Household: Shall be defined as one (1) of the following:
51. (a) One (1) family related by blood, marriage, adoption, or foster agreement;
52. (b) Not more than six (6) persons who are not so related, living together as a single house-keeping unit;
53. (c) A religious community having not more than fifteen (15) members; or
54. (d) A residential facility providing housing for up to six (6) persons with disabilities and two (2) caregivers. For purposes of this subsection, a “disability” means, with respect to a person, a physical or mental impairment which substantially limits one (1) or more of such person's major life activities, or a record of having, or being regarded as having, such an impairment, but such item does not include current, illegal use of a controlled substance.<sup>298</sup>

Assuming that “residential facility” (a term used one more time elsewhere in the zoning code) means a “community residence facility,” (defined in another city ordinance as discussed two paragraphs below) community residence facilities housing up to six people *with disabilities* plus two caretakers are “households” under this definition. No zoning restrictions — spacing between community residences or requiring a license or certification — can be placed upon these community residence facilities unless they are imposed on all households. The definition of “disability” given there is the classic definition in the Fair Housing Act.

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<sup>296</sup> <sup>296</sup> It is extremely well-settled that people with drug and/or alcohol addictions who are not currently using an illicit drug are people with disabilities under the *Fair Housing Act* and the *Americans With Disabilities Act*. See 42 U.S.C. 3602(h) and 24 C.F.R. 100.201(a)(2). See, also, *City of Edmonds v. Washington State Building Code Council*, 115 S. Ct. 1776 (1995).

<sup>297</sup> Joint Statement of the Department of Housing and Urban Development and the Department of Justice, *State and Local Land Use Laws and Practices and the Application of the Fair Housing Act* (Nov. 10, 2016) available at <https://www.justice.gov/crt/page/file/909956/download>.

<sup>298</sup> *Zoning Regulations of the District of Columbia*, Subtitle B, §100.2

So, under this definition of “household,” any community residence facility for people with disabilities that houses no more than six unrelated individuals plus two caregivers *must* be allowed as of right in all residential districts. The District cannot impose any additional requirements on community residences that comply with this definition of “household” other than those imposed on the residential structure in which the home is located. Community residences for up to six people with disabilities plus two caregivers must be treated the same as any other family. This legal principle does not apply to community residences for people *without* disabilities or to people with disabilities “whose tenancy would pose a direct threat to the health or safety of other individuals.... there must be objective evidence from the person’s prior behavior that the person has committed overt acts which caused harm or which directly threatened harm.”<sup>299</sup>

The District’s new ordinance, however, does not define “residential facility” or other relevant terms used in the District’s zoning code. Instead it uses some terms defined in the District’s *Health Care and Community Residence Facility, Hospice and Home Care Licensure Act of 1983*.

55. “Community residence facility” means a facility that provides a sheltered living environment for individuals who desire or need such an environment because of their physical, mental, familial, social, or other circumstances, and who are not in the custody of the Department of Corrections. All residents of a community residence facility shall be 18 years of age or older, except that, in the case of group homes for persons with intellectual disabilities, no minimum age shall apply, unless this requirement is waived in accordance with § 44-505(e).<sup>300</sup>

56. (5) “Group home for persons with intellectual disabilities” means a community residence facility that provides a home-like environment for at least 4 but no more than 8 related or unrelated individuals who on account of intellectual disabilities require specialized living arrangements, and maintains the necessary staff, programs, support services, and equipment for their care and habilitation.<sup>301</sup>

Note that the definition of “community residence facility” does not limit their occupants to people with disabilities. The definition does, however, exclude people younger than 18, a provision that does not comply with the Fair Housing Act.

Like its predecessor, the District’s zoning code is not the easiest to understand — an assessment with which city staff members interviewed unanimously agree. The code offers a list of use categories that includes:

57. (bb) Residential:

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<sup>299</sup> H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2189–2190.

<sup>300</sup> *District of Columbia Health Care and Community Residence Facility, Hospice and Home Care Licensure Act of 1983*, (D.C. Law 5-48; D.C. Official Code §§ 32-1301 et seq., at §44–501 (4).

<sup>301</sup> *Ibid.* (5).

58. (1) A use offering habitation on a continuous basis of at least thirty (30) days. The continuous basis is established by tenancy with a minimum term of one (1) month or property ownership;

59. (2) This use category also *includes residential facilities that provide housing and supervision for persons with disabilities*, which may include twenty-four hour (24 hr.) on-site supervision, lodging, and meals for individuals who require supervision within a structured environment, and which may include specialized services such as medical, psychiatric, nursing, behavioral, vocational, social, or recreational services;

60. (3) Examples include, but are not limited to: single dwelling unit, multiple dwelling units, *community residence facilities*, *retirement homes*, *rooming units*, *substance abusers' home*, *youth residential care home*, *assisted living facility*, floating homes, or other residential uses; and (4) Exceptions: This use category does not include uses which more typically would fall within the lodging, education, or *community-based institutional facility* use categories;<sup>302</sup>

The code, however, does not define “community residence facilities.” It does, however, in paragraph (bb)(2) above define “residential facilities” which sounds like a community residence for persons with disabilities.

It is highly unusual to lump together uses as different as community residence facilities (presumably community residences for people with disabilities) with rooming units, retirement homes, and floating homes (waterborne structure used as a residence at least 15 days a month). The zoning principle that underlies this escapes the authors of this study.

To avoid confusion with community residence facilities, the zoning code defines “community-based institutional facility” as:

61. Community based institutional facility – A use providing court-ordered monitored care to individuals who have a common need for treatment, rehabilitation, assistance, or supervision in their daily living; have been assigned to the facility; or are being detained by the government, other than as a condition of probation.<sup>303</sup>

- **Examples:** adult rehabilitation home, youth rehabilitation home, or detention or correctional facilities that do not fall within the large scale government use category.
- **Exceptions:** This use category does not include uses which more typically would fall within the emergency shelter or large scale government use category. This use category also does *not* include residential or medical care uses that were previously defined as community residence facilities, health care facilities, substance abuser’s homes, or youth residential care homes.<sup>304</sup>

<sup>302</sup> Emphasis added. *Zoning Regulations of the District of Columbia*, Subtitle B, §200.2 (bb).

<sup>303</sup> *Zoning Regulations of the District of Columbia*, Subtitle B, §100.2 (bb)

<sup>304</sup> *Ibid.* §200.2 (f). Emphasis added.

This definition makes it clear that these community based institutional facilities are not community residence facilities — consequently the Fair Housing Act does not come into play for them.

Previously, the District’s zoning ordinance grouped community residences of all types under the rubric “community–based residential facility” which it defined as a residential facility for persons who have a common need for treatment, rehabilitation, assistance, or supervision in their daily living. The old zoning code also did not limit occupancy to people with disabilities. While it was possible under the old zoning code to determine in which zoning districts different types of “community–based residential facilities” could be located, the 2016 zoning code eludes understanding. The current zoning ordinance is nearly impenetrable.

In Subtitle U of the current zoning code, each zoning district includes a list of uses allowed as a matter–of–right and other uses allowed by special exception (known elsewhere as a special or conditional use permit). The term “community residential facility” does not appear in any of the lists of uses allowed as a “matter of right” or by “special exception.” Where there is no doubt that community residential facilities for up to six residents plus two caregivers are allowed as a matter of right with no additional restrictions where ever residential uses are allowed, the ordinance is silent on community residential facilities for more than six occupants.

Perhaps the drafters of the new ordinance meant for community residences for people with disabilities housing more than six people plus two support staff to be treated as a “health care facility” which is any use licensed under the District of Columbia Health Care and Community Residence Facility, Hospice and Home Care Licensure Act of 1983.<sup>305</sup>

But the ordinance lists as a matter–of–right use in R–Use Groups A, B, and C health care facilities:

62. for not more than six (6) persons not including resident supervisors or staff and their families. The facility may accommodate seven (7) to eight (8) persons, not including resident supervisors or staff and their families, provided there shall be no property containing an existing health care facility for seven (7) or more persons either in the same square, or within a radius of one thousand feet (1,000 ft.) from, any portion of the subject property;<sup>306</sup>

It is highly doubtful that “community residential facilities” were meant to be included as a “health care facility” because the zoning code had included “community residence facilities” for up to six residents plus two support staff in its definition of “household.” Consequently, no spacing distance could be legally required of a community residence facility for up to six people with disabilities plus two caregivers. As noted earlier, a zoning code cannot impose additional requirements on a community residence people with disabilities when the community residence fits within the definition of “household” as it does in the District.

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<sup>305</sup> D.C. Law 5-48; D.C. Official Code §§ 32-1301 *et seq.*

<sup>306</sup> *Zoning Regulations of the District of Columbia*, Subtitle U, §202.1(j).

If the drafters of the new zoning code actually did intend to include “community residence facilities” within the broader rubric of “health care facility,” then the code gets even more bizarre because it combines together into one category community residences, which are a residential use by definition, with health care facilities for nine to 300 persons which are largely institutional uses. The current zoning code requires a special exception for health care facilities in residential use groups A, B, and C:

63. (i) Health care facility use for nine (9) to three hundred (300) persons, not including resident supervisors or staff and their families, subject to the following conditions:
  64. (1) In R-Use Group A, there shall be no other property containing a health care facility either in the same square or within a radius of one thousand feet (1,000 ft.) from any portion of the property;
  65. (2) In R-Use Groups B and C, there shall be no other property containing a health care facility either in the same square or within a radius of five hundred feet (500 ft.) from any portion of the property;<sup>307</sup>

It is highly doubtful that any research was conducted to determine these spacing distances. In addition, as noted earlier community residences for people with disabilities emulate a family and are a very different use than much larger congregate living arrangements and medical facilities. It defies rationality, sound zoning principles, and the Fair Housing Act for a zoning code to treat them the same. In addition, this language appears to strictly prohibit locating a health care facility within a spacing distance. This is a perversion of the purpose of spacing distances which have always been intended to be used as a standard to allow community residences for people with disabilities as a matter-of-right use. If an operator sought to locate within the spacing distance, she would then have to seek the case by case review of a special exception.

The continuing use of the word “facilities” suggests a misunderstanding of the nature of these residences. These are *residential uses* with the primary purpose of providing a place of abode in a family-like environment. The word “facilities” implies an *institutional use* which is very much the opposite of a community residence. The zoning code should be amended to more accurately call these uses something like “community residences” instead of “community residence facilities.”

If what is being reported seems confusing and bizarre, it is. In the course of preparing this analysis, the authors of this report interviewed numerous city staff members in the Office of Zoning and in the Office of Planning. Not a single one of these dedicated professionals could explain how the new zoning ordinance works or specify the zoning districts in which community residential facilities for more than six people were allowed either as a matter-of-right or as a special exception. The best guess anybody could make was that they were considered “health care facilities” which, as noted above, simply makes no sense.

The District’s zoning for community residences for people with disabilities is even more hopelessly muddled than under the previous zoning code. There is a lack of consistency in the terms used. Some provisions seem more than a bit contradictory. It appears that there continues to be a lack any rationality to explain the zoning treatment of community residences for people

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<sup>307</sup> Ibid. §203.1(i).

with disabilities in D.C. If the District staff who administer the zoning code cannot identify which zoning districts allow community residence facilities for more than six people, then how can anybody expect a housing provider to figure it out?

As more than one city staff professional suggested, the District needs to conduct a thorough study of its current zoning treatment of community residences for people with disabilities — including identifying precisely how these uses are actually treated in the current zoning code — and comprehensively revamp the ordinance to make its provisions for community residences for people with disabilities understandable, consistent, rational, and within the boundaries of sound zoning practices and of the Fair Housing Act.

### *Building and Housing Codes As Applied to Community Residence Facilities*

The zoning ordinance is *not* the proper place to regulate the number of residents in a community residence facility for people with disabilities. A city should not base its zoning treatment of community residences for people with disabilities on the number of residents in the home. The proper regulatory tool is the provision in a city's housing, building, or property maintenance code to prevent overcrowding. Typically, this occupancy standard *which must apply to all residential uses*, requires 70 square feet of bedroom space for the first occupant of the bedroom and 50 more square feet for each additional bedroom occupant. It is worth stressing that this standard applies to *all* residential uses and that it applies to the District's community residence facilities including group homes for persons with intellectual disabilities because they are residential uses just like any other household.

The District publishes the changes it has made to the standard building codes it has adopted online at <http://dcra.dc.gov/DC/DCRA/Permits/Construction+Codes>. The District has adopted the *2006 International Property Maintenance Code*, *2006 International Residential Code*, *2006 International Building Code*, and *2006 Existing Building Code*. Unless the District has altered them, these codes use one of the formulae described immediately above. Unfortunately, it was impossible to learn if the D.C. codes include this sort of an overcrowding provision. If they do not include one, the District should adopt one. It was possible, however, to discover that the District requires fire sprinkler systems in community residence facilities and substance abuse homes.<sup>308</sup> The District's *2013 Building Code* requires an automatic sprinkler system in *all* group homes for six or fewer persons, larger group homes, congregate living facilities of a variety of sizes, and halfway houses.<sup>309</sup>

But, as the courts have consistently pointed out, it is important to remember that the original purpose of such fire sprinkler systems was for situations where the occupants are not capable of self-evacuation in the event of a fire or other emergency. Today the courts have paid attention to this original purpose and have made it clear that a city must make a reasonable accommodation by waiving the fire sprinkler requirement when the occupants of a community residence for people with disabilities are capable of self-evacuation or self-preservation. The courts are clear that failure to waive the fire sprinkler requirement runs afoul of the Fair Housing Act when the

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<sup>308</sup> The District's *2013 Building Code* is available online at <https://codes.iccsafe.org/content/chapter/9174>. It is, however, very difficult to use and cannot be downloaded.

<sup>309</sup> *2013 District of Columbia Building Code*, §380.3.1, 310.3, 310.5, and 310.6.

occupants of a community residence for people with disabilities are capable of self-preservation and can evacuate on their own in case of a fire.<sup>310</sup>

The District's building code recognizes this fundamental principle only when it comes to institutional uses for medical care where the residents are "incapable of self-preservation."<sup>311</sup> Otherwise the District simply requires installation of these expensive fire suppression systems without regard to the ability of the occupants of a community residence facility or substance abuse home to self evacuate in the event of a fire or other emergency.

The District needs to either amend its building code to remove this fire sprinkler requirement for those community residence facilities that house people capable of self-preservation or establish a simple, very low-cost process to request a reasonable accommodation to waive the fire sprinkler requirement when the occupants are capable of self-evacuation in the event of a fire or other emergency.

*State or Local Laws, Policies, or Practices that Discourage Individuals with Disabilities From Living in Apartments, Family Homes, Supportive Housing and Other Integrated Settings*

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings are not a significant contributing factor to fair housing issues for persons with disabilities in D.C. do contribute to the segregation of persons with disabilities in other parts of the Region. Far from encouraging segregation, the District's policies have been proactively oriented towards encouraging community integration for persons with disabilities with respect to housing. In suburban Maryland, however, due to long waiting lists and policies that enable individuals living in nursing homes to bypass waiting lists, state policies have incentivized individuals who are at-risk of institutionalization to temporarily enter nursing homes prior to receiving home and community-based services.

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<sup>310</sup> See *Alliance for Mentally Ill v. City of Naperville*, 923 F. Supp. 1057 (N.D. Ill. 1996); *Marbrunak v. City of Stow, Ohio*, 974 F.2d 43 (6th Cir. 1992); *Oxford House v. Browning*, 266 F.Supp. 3d 896, (M.D., LA 2017; consent decree in *United States v. Beaumont, Texas* (E.D. Texas 2015) available at <https://www.justice.gov/crt/case-document/consent-decree-united-states-v-city-beaumont-texas-ed-tex>; *Bangerter v. Orem City Corporation* (46 F.3d 1491 1995); *Potomac Group Home Corp. v. Montgomery County, Maryland*, 823 F.Supp. 1285 (M.D. Maryland 1993); *Tsombanidis v. West Haven Fire Dep't*, 352 F.3d 565 (2d Cir. 2003), aff'g in part and reversing in part, 180 F.Supp.2d 262 (D.Conn. 2001) and 208 F.Supp.2d 263 (D.Conn. 2002).

<sup>311</sup> *Ibid.* §308.4

## E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

The following section describes the status of fair housing enforcement in the District and evaluates related capacity and resources. It provides an overview of current and recent fair housing claims and findings; fair housing laws, which protect residents from discrimination; and local organizations that focus on protecting fair housing rights and providing counseling and public education.

1. List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
  - A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

<b>Table 1 – DC Office of Human Rights Fair Housing Complaints</b>		
<b>Fiscal Year</b>	<b>Docketed Cases</b>	<b>Complaints of Housing Discrimination- Initial Inquiries</b>
2017	42	227
2016	41	197
2015	65	215
2014	36	N/A
2013	33	N/A

<b>Table 2 – Equal Rights Center Fair Housing Complaints in DC</b>	
<b>Year</b>	<b>Complaints of Housing Discrimination- Initial Inquiries</b>
2018	113
2017	83
2016	32

Table 1 shows trends in the number of cases that met all jurisdictional requirements under law and were docketed for investigation by the DC Office of Human Rights, based on OHR’s annual reports. The number of docketed cases has increased over the years. Source of income was the

most common basis for the cases docketed in Fiscal Years 2016 and 2017. Disability was the second most cited basis for docketed cases. Table 2 shows the number of fair housing complaints reported to the Equal Rights Center from District residents. The large increase in the number of complaints suggests that more resources may be needed to enforce fair housing laws.

In 2018, a lawsuit, *Fuller v. District of Columbia*, was filed in federal district court against the DC Department of Housing and community Development, the DC Housing Authority, the DC Zoning Commission, and other District agencies. The complaint alleges that the city's land-use and housing policies are designed to attract more affluent residents and displace longtime District residents. The complaint also alleges that these practices violate the Fair Housing Act and the DC Human Rights Act.

*2. Describe any state or local fair housing laws. What characteristics are protected under each law?*

#### **District of Columbia Law:**

##### **D.C. Code § 2–1402.21**

The **District of Columbia Human Rights Act** prohibits discrimination in housing on the basis of many protected traits. These traits include race, color, religion, national origin, sex, age (18 years or older), marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities (supporting a person in a dependent relationship), political affiliation, and disability. In addition, the Act protects against discrimination on the basis of matriculation (enrollment in a college, university, or secondary school), familial status, source of income, place of residence or business, and status as a victim of an intrafamily offense (a person who was subjected to domestic violence, sexual assault, and stalking).

##### **D.C. Code § 42–3541.02**

The **Fair Criminal Screening for Housing Act** of 2016 imposes several requirements for rental housing providers screening the criminal background of a housing applicant. The law requires rental housing providers to disclose, in writing, (A) the eligibility criteria used to decide whether to rent to the applicant and (B) a statement that the applicant may provide evidence demonstrating inaccuracies within the criminal record or evidence of rehabilitation or other mitigating factors.. Additionally, the law prohibits housing providers from making an inquiry or asking any questions related to an applicant's criminal background or arrest history at any time prior to making a conditional offer of housing. After making a conditional offer, a housing provider may only consider a pending criminal accusation or criminal conviction that has occurred within the past 7 years.

*3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.*

The **District of Columbia Office of Human Rights (OHR)** is charged with enforcing several laws including the District of Columbia Human Rights Act. Additionally, the agency is a Fair

Housing Assistance Program agency and can investigate and adjudicate complaints of discrimination filed under the Fair Housing Act. OHR issues guidance on the DC Human Rights Act, investigates and resolves complaints of unlawful discrimination in housing. The agency also conducts educational campaigns and initiatives to educate the public about civil and human rights in the District. The agency faces resource constraints that limit its ability to fully enforce fair housing in the District.

The **Equal Rights Center (ERC)** is a private civil rights organization that identifies and seeks to eliminate unlawful and unfair discrimination in housing in the greater Washington area and nationwide. The Equal Rights Center’s core strategy for identifying housing discrimination is civil rights testing. The ERC conducts tests and trains civil rights testers. The ERC also conducts fair housing trainings to educate the public, engages in policy advocacy, and takes action to enforce fair housing laws. In addition, the ERC conducts research and releases publications on fair housing.

The **Washington Lawyers’ Committee for Civil Rights and Urban Affairs** uses litigation, public education, and policy advocacy to fight housing discrimination. The Housing Justice Project at the organization handles a wide variety of issues including predatory lending, discriminatory real estate advertising, insurance discrimination, exclusionary zoning, discrimination against families with children, and discrimination against low-income families who use housing subsidies.

*4. Additional Information*

Home Mortgage Disclosure Act from 2016 reveals that racial/ethnic minorities in the Washington metropolitan area face notably higher loan denial rates than white applicants for conventional and government-backed home-purchase loans, refinancing loans, and for home improvement loans. These disparities can contribute to a number of impediments to fair housing and can indicate the need for greater fair housing enforcement.

<b>Table 3 – Loan Application Denial Rate, Washington Metropolitan Area</b>				
<b>Race/Ethnicity</b>	<b>FHA, FSA/RHS, and VA Home-Purchase Loans</b>	<b>Conventional Home-Purchase Loans</b>	<b>Refinance Loans</b>	<b>Home Improvement Loans</b>
American Indian/Alaska Native	7.5%	12.9%	30.2%	59.1%
Asian	14.4%	8.8%	20.3%	43.2%

Black	14.8%	14.5%	29.9%	49.9%
Native Hawaiian/Other Pacific Islander	10.8%	8.0%	23.8%	59.0%
White	8.4%	5.8%	17.6%	29.1%
Two or More Minority Races	17.1%	13.9%	36.6%	59.7%
Joint (White/Minority Race)	8.7%	5.6%	14.2%	22.8%
Race Not Available	11.4%	7.1%	22.2%	37.0%
Hispanic or Latino	12.1%	11.7%	23.8%	50.2%
Not Hispanic or Latino	10.7%	7.2%	21.5%	37.9%
Joint (Hispanic or Latino/Not Hispanic or Latino)	7.8%	6.4%	16.5%	17.5%

## Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

### Lack of local private fair housing outreach and enforcement

A lack of enforcement is a moderate contributing factor. Although local fair housing organizations conduct testing, bring litigation, and investigate claims, there is a lack of fair housing knowledge among the general public. In particular, stakeholders report that many members of the public do not know what characteristics are protected by fair housing laws and do not know where to go to report fair housing violations. This suggests that more outreach and education resources are needed. The number of cases reported to private fair housing groups may also be misleading because the majority of fair housing cases do not get reported.<sup>312</sup>

### Lack of local public fair housing enforcement

This is a moderate contributing factor to fair housing issues in the District. As seen in Table 1 above, the DC Office of Human Rights reported that the number of cases of housing discrimination that were docketed for investigation remained stable in Fiscal Years 2016 and 2017.<sup>313</sup> The number of initial complaints of housing discrimination to OHR increased by 15%

<sup>312</sup> <https://wamu.org/story/18/04/11/housing-discrimination-rife-d-c-region-50-years-fair-housing-became-law/>

<sup>313</sup>

[https://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/OHR%20AR%202017\\_090618\\_FINAL\\_0.pdf](https://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/OHR%20AR%202017_090618_FINAL_0.pdf)

between Fiscal Year 2016 and Fiscal Year 2017. The relative stable number of docketed cases in FY 2016 and FY 2017 suggests that enforcement by OHR is not worsening, but the increase in the number of complaints of housing discrimination also suggests that additional efforts may be needed to prevent reoccurring problems. Furthermore, the number of complaints may not fully capture the extent of discrimination, given the gaps in public knowledge raised by stakeholders.

#### Lack of resources for fair housing agencies and organizations

A lack of resources for fair housing agencies and organizations is a moderate contributing factor to fair housing issues. Existing resources are described in more detail in the Enforcement section above. The DC Office of Human Rights is in charge of investigating claims of housing discrimination. However, stakeholders widely report that the Office does not have enough staff capacity and resources to adequately handle claims and investigate cases.

#### Lack of State or Local Fair Housing Laws

A lack of local fair housing laws is a minor contributing factor. The District has one of the most comprehensive set of housing protections in the country. The DC Human Rights Act provides protections to many more traits than the Fair Housing Act. Moreover, DC law also prohibits housing providers from inquiring about an applicant's criminal background. However, Virginia and Maryland state law offer fewer protections. Several local jurisdictions in Maryland and Virginia provide additional protections beyond what is covered under state law.

## DISTRICT OF COLUMBIA GOALS AND STRATEGIES FOR OVERCOMING IMPEDIMENTS TO FAIR HOUSING CHOICE

### I. Reduce Disproportionate Housing Cost Burden for Members of Protected Classes

- Housing costs in the District of Columbia are extremely high and have increased significantly in recent years. Members of protected classes that are disproportionately likely to be low-income, including Black and Hispanic residents and persons with disabilities, have borne the brunt of increased housing cost burden. Rising housing costs have resulted in the displacement of the many of these households while, for those who remain, many pay unsustainably high percentages of their incomes in rent. The objective of the following priorities is to reduce housing costs in targeted ways that alleviate these conditions for members of protected classes.
- A. Amend the District’s Inclusionary Zoning Program through a package of incentives and requirements that would result in nearly all developers to setting aside 20% or more of a property’s square footage as affordable.
- Currently, the Inclusionary Zoning (IZ) Program requires a set aside of 8 to 10% of square footage for affordable housing (the effective set-aside is somewhat higher when density bonus units are taken into account). This set aside percentage is low in comparison to cities and counties in some other strong housing markets, including suburban counties in the Region. At the same time, adopting a significantly higher set-aside requirement without making additional incentives available to offset the cost of providing affordable units could render IZ less effective in the event of a downturn in the real estate market. The District of Columbia should adopt a combination of incentives and requirements that result in an effective set-aside of 20% of square footage in nearly all new developments.
- B. Dedicate funding to enable non-profit affordable housing developers to purchase units produced through the District’s Inclusionary Zoning Program and rent those units to households with incomes at or below 30% of the Area Median Income.
- Additionally, the District’s Inclusionary Zoning Program does not produce units that are affordable to the lowest income households who are struggling the most with the effects of rising housing costs and who disproportionately include members of protected classes. For example, according to 2011-2015 CHAS data, 56.1% of Black households in the District are extremely low-income and have incomes at or below 30% of the Area Median Income as opposed to just 22.9% of all households. Although requiring developers to produce units for

extremely low-income households directly may undermine production goals under the IZ program, the District could still make units in these developments affordable to extremely low-income households by funding the purchase of such units by nonprofit affordable housing developers. Doing so would be similar in concept to Montgomery County, Maryland's program of purchasing IZ units to be managed as scattered-site public housing.

C. Broaden rent control protections.

- The District's rent control protections have exemptions that have decreased the policy's strength over time. In particular, units built after 1975 are exempt from rent control. Although exempting newly constructed units from rent control is a common practice that is intended to prevent rent control from being a deterrent to new housing development, it is a better practice to have the exemption function on a rolling basis. Instead of exempting units that are now 44 years old, an ordinance might exempt all units that were built within the past 15 years. Additionally, the rent control law exempts rental units owned by natural persons who own no more than four rental units. This exemption focuses on small landlords with relatively limited capacity and is not related to concerns about the effects of rent control on housing production overall. Rental units that fall within this exemption are likely to be disproportionately concentrated in areas that have more single-family homes and rowhouses and relatively few apartment buildings. The District should remove the exemption either entirely or in connection with any future zoning changes that permit the renting of accessory dwelling units, English basements, and other units that may not be currently permitted.
- Currently, the Rental Housing Act of 1985 allows for an annual adjustment in rent, based on the increase in the consumer price index. However, landlords may file a hardship petition to increase rents beyond the allowable rent increase in order to earn a 12% annual rate of return on their property investment. Although this exemption is designed to prevent financial hardship for landlords, the high threshold for a rate of return has served as a loophole in rent control and led some landlords to impose burdensome rent increases on tenants. The rate of return threshold is outdated and should be modified to reflect current market conditions. Another provision serves as a loophole to rent control. Landlords may propose a voluntary agreement that includes substantial rent increases but provides that only future tenants (or sometimes current tenants who are not members of the signing tenant association) will have to pay them. Often, landlords claim that these agreements will help raise funds for capital improvements. If 70% of current tenants agree, the increases may be enacted. This

practice undermines the intent of rent control and directly threatens housing affordability. The District should prohibit these agreements.

## **II. Ensure Access to Safe and Habitable Homes**

- Housing conditions in many rental properties that are affordable to low-income households are abysmal. This includes conditions in properties owned by the D.C. Housing Authority that have been neglected due to inadequate federal financial support over the course of decades as well as conditions in privately owned buildings where landlords may be seeking to drive out tenants with rights under the Tenant Opportunity to Purchase Act. People of color within D.C. are disproportionately exposed to these conditions. Dangerous conditions can have direct adverse health consequences and can also fuel displacement and gentrification as whole buildings become uninhabitable and are ultimately demolished.
- A. Fully fund critical repairs to D.C. Housing Authority properties.
- The D.C. Housing Authority and the District of Columbia have a fundamental responsibility to ensure that their own tenants, who are disproportionately Black and disproportionately have disabilities, are able to live in safe, habitable conditions. Though the cost of critical repairs is high due to years of deferred maintenance, it is a necessary cost and a moral imperative. Unfortunately, Congress has failed to make more funding available for public housing repairs. In the absence of such funding, the District should fully fund critical repairs and enable D.C. Housing Authority residents to live in dignity.
- B. Target proactive, objective, and transparent inspection activity toward areas for housing code violations.
- In 2017, the Department of Consumer and Regulatory Affairs (DCRA) began implementing a proactive inspection program for multifamily rental properties with three or more units. This was a great improvement because complaint-based code enforcement systems are often fraught with inequity due to tenants' fears of retaliation. The robust data that DCRA has captured about the program allows for some conclusions about next steps for improving habitability. Overall, 25% of proactive inspections are conducted in Wards 7 and 8. That is proportional to the portion of District residents who live in Wards 7 and 8. At the same time, 39% of inspections that uncovered housing code violations were in Wards 7 and 8. As Black residents are concentrated in these wards, Black residents are likely disproportionately exposed to housing code violations. Given this dynamic, DCRA should prioritize proactive inspection activity in Wards 7 and 8, in particular. Standards for all inspections should be transparent, objective, and consistent.

### III. Increase Access to Opportunity for Residents

- Across a range of different dimensions, the disproportionately Black residents of certain neighborhoods have limited access to opportunity. Targeted investments and policy interventions can help to reduce these disparities.
- A. Increase investment in the clean-up of contaminated sites.
    - Sites in the District that have been identified by the Department of Energy & Environment as cleanup sites are disproportionately located east of the river. At the same time, relatively few sites that have been remediated through the Voluntary Cleanup Program are located east of the river. This suggests a need for a greater targeted focus on identifying and then remediating contaminated sites in communities that have the greatest health burdens within the District.
  - B. Incorporate an environmental justice analysis into the review of zoning and permitting applications that would result in new land uses that might result in environmental burdens.
    - Land uses that result in localized environmental harms are concentrated in Wards 5, 7, and 8, all of which are predominantly Black. The District's Production, Distribution, and Repair Zone classification allows for these types of land uses and is also more commonly found in those same wards. One example is the prevalence of light industrial uses along the Red Line tracks in Eckington in Ward 5. The presence of machine shops within one block of rowhouses without any real buffer contributes to environmental health disparities. Going forward, the Office of Planning and other responsible parties could incorporate an environmental justice analysis into their approval processes in order to avoid such outcomes.
  - C. Ensure equity in the quality of transportation infrastructure.
    - The condition of roads and sidewalks in the District varies across neighborhoods in a manner that often coincides with patterns of racial segregation. When making investments in the maintenance of streets and sidewalks, the District should prioritize the reduction of those disparities when selecting projects.
  - D. Heighten Inclusionary Zoning requirements within close proximity to Metrorail stations.
    - In recent decades, neighborhoods near Metrorail service, particularly on the Red and Green Lines, have become much less heavily Black, as lower income families are pushed out by development and rising rents. In order to ensure continued access to transportation, it is critical that the District prioritize affordable housing as sites near Metrorail stations are redeveloped. The District has the necessary leverage to impose higher

set-aside requirements near Metrorail stations both because of the strong demand for market-rate demand for housing near transit and because of the cost savings associated with reduced or eliminated parking requirements. In modifying its Inclusionary Zoning program, the District should require that 30% of square footage be set aside for affordable housing at sites that are within ¼ mile of a Metrorail station.

#### **IV. Increase Community Integration for Persons with Disabilities.**

- Compared to most states, the District of Columbia has relatively robust community-based services and supports for persons with a variety of different types of disabilities. Also to a much greater extent than elsewhere, these services are often available for individuals to start receiving right away, without having to sign up for and remain on a waiting list for years. Although there are quality control issues that have undermined successful community integration for persons who were not getting the services that providers had been engaged to offer, the availability of supportive services is not the main barrier to community integration. Instead, securing safe and affordable housing is the bigger issue. Although a much wider array of locally-funded housing programs is available in the District than elsewhere, District-funded tenant-based rental assistance programs run up against the obstacle posed by high market rents. These high rents have driven some residents with disabilities out to Maryland.
- A. Implement allowable rent standards based on the D.C. Housing Authority's payment standards for all tenant-based rental assistance programs.
- The D.C. Housing Authority has in large measure solved the problem of Housing Choice Voucher holders not being able to find units by having neighborhood-based payment standards that go up to as high as 175% of the Fair Market Rent. Other, more targeted programs that help individuals with disabilities live in private rental housing are not as generous. For example, for the Department of Disability Services' program, the maximum rent for a two-bedroom unit is roughly \$1,800. In the District's most expensive neighborhoods, the D.C. Housing Authority's payment standard for a two-bedroom unit is \$3,113. Although matching the D.C. Housing Authority's payment standards would increase the cost of providing housing on a per capita basis, doing so would help ensure that persons with disabilities who have deep ties in the District are able to remain.
- B. Provide funding for accessibility retrofits in community residential facilities.
- There are 99 community residential facilities for persons with disabilities in the District with a total of 666 beds. Very few of these facilities are accessible to persons with ambulatory disabilities. The District should make funding available for accessibility retrofits in order

to ensure that a physical disability is not the reason why a person with a psychiatric disability is unable to live in a community-based setting.

**V. Promote Housing Choice and Redress Segregation and Exclusion.**

- The legacy of redlining, restrictive covenants, and other discriminatory practices continues to have a strong impact in the District, which remains highly segregated by both race and income. This continuing segregation is closely tied to the disparities in resources and access to opportunity discussed within this analysis. In addition, as cost pressures rise for District residents, it is important that all areas of the District jointly contribute to meet our affordable housing needs.
- A. Expand affirmative marketing requirements and resources for housing mobility counseling services.
  - Numerous stakeholders raised concerns regarding the lack of publicly-distributed, accurate information about the availability affordable options and inclusionary units, even for specific buildings they are familiar with in their current neighborhoods. DCHFA and DC HCD should develop requirements for broader, more concerted marketing and outreach (including to voucher holders) of inclusionary units and tax credit developments.
  - DCHA does have a growing mobility counseling program that voucher holders may opt to participate in if seeking to move to a range of locations throughout the District, such as areas with high-performing schools. However, the need for such programs will expand as DCHA continues its redevelopment plans. Additional resources would enable DCHA to expand such counseling services, including both mobility counseling and other aspects of tenants' needs and rights. Furthermore, DCHA should begin planning to enact policies providing for advance choice-mobility counseling for residents in buildings undergoing RAD conversions, as required by the RAD statute.
- B. Implement the Mayor's Housing Plan so as to ensure meaningful new housing options, including for low-income families.
  - There are significant imbalances in the distribution of affordable and subsidized housing among the District's Wards. The District has taken some positive steps to address this, including incentives to develop tax credit properties in Economic Opportunity Areas as designated by the Qualified Allocation Plan, and in the Mayor's Housing Plan, which calls for additional housing production across the eight wards. While the Housing Plan establishes general principles for balanced development, DCHCD should enact a detailed implementation plan that will ensure this vision achieves its intended goals. This plan should provide for sufficiently deep affordability; choices for families (i.e., large bedroom

units) in high-opportunity areas; prioritize incentives and oversight for production in high-opportunity areas; and ensure careful siting of any new construction in Wards with existing concentrations of affordable housing, to avoid further reinforcing such concentration, and to ensure that new affordable construction in those areas is combined with other resources and community development strategies.

C. Address exclusionary impacts of zoning and planning policies.

- To address deeply entrenched patterns of exclusion and residential segregation, the District of Columbia should consider modifying its Comprehensive Plan to reduce the amount of land that is zoned only for single-family homes, especially in high-opportunity areas. Currently, many areas in the District are essentially off-limits to multifamily housing, resulting in very little housing supply being added in much of the city. It is especially difficult to site affordable housing in areas west of Rock Creek Park in part because of a lack of an appropriately zoned sites. The prevalence of single-family zoning in these areas also steers high-density market-rate development toward gentrifying neighborhoods east of Rock Creek Park, thus exacerbating displacement pressures. Significantly reducing the amount of residential land that only permits single-family homes may help to increase the overall supply of housing in the District and will allow for more density and a greater mix of housing types including duplexes, fourplexes, and apartment buildings that are more accessible to a wider range of incomes. Building more types of housing may help increase the overall housing supply in the District, improve access to high-opportunity neighborhoods for low and middle-income families, and address multiple contributing factors to fair housing issues. Reforms to zoning policies west of Rock Creek Park should include both the legalization of 2-4 unit structures in areas currently zoned for single-family homes and multi-family zoning that allows for the development of apartment buildings on major corridors including but not limited to Connecticut Avenue, Wisconsin Avenue, and MacArthur Boulevard.
- The District updated its zoning code in 2016 to reduce minimum parking requirements for new buildings and allowed by-right development of accessory apartments in nearly all residential zones in the city. While these were beneficial changes, further action should be taken. The District should consider eliminating all minimum parking requirements in the city and imposing parking maximums in order to help reduce construction costs for multifamily buildings. In addition, the District should consider streamlining requirements to help reduce the cost and complexity of constructing accessory apartments as well as other multifamily buildings. Doing so could help make projects more feasible and improve the overall supply of housing.

- D. Incorporate a cross-agency fair housing and equity analysis into the review of public housing redevelopment plans and planned unit developments.
- Some recent large scale development and redevelopment efforts have not sufficiently addressed the needs of large families with children, persons with disabilities, and Black residents of the District, in particular. By incorporating a fair housing analysis in the review process for redevelopment plans and planned unit developments at an early stage, the District's Office of Planning could catch issues such as the distribution of unit sizes in proposed developments while it is still feasible to amend plans.

## **VI. Increase Access to Proficient Schools and Disrupt the Cycle of Residential and School Segregation**

- Patterns of housing segregation and housing policies in the District have a significant impact on school segregation and access to proficient schools, and some D.C. education policies reinforce and enhance the effects of housing segregation.
- A. Ensure that families with housing assistance have access to high performing schools.
- One of the most direct steps that D.C. can take to address disproportionate access to proficient schools is to fully implement the Mayor's Housing Initiative, with an emphasis on developing a fair share of deeply income targeted apartments with large bedroom sizes in the highest performing D.C. elementary school zones, and giving preference in those units to families with children in neighborhoods with the lowest performing school zones in the District. The D.C. Housing Authority can also play an important role by giving affirmative assistance to families in these low performing school zones who have Housing Choice Vouchers and who wish to move to an apartment in a high performing school zone.
- B. Explore revisions to school assignment boundaries and feeder patterns to avoid reinforcing segregation.
- When DCPS next revisits its school assignment zones, it should avoid reinforcing housing segregation in its drawing of assignment zones, including possible consideration of non-contiguous assignment zones. Well in advance of the 2023 redrawing of assignment zones, DCPS should embark on a study of its options, including a community engagement process (possibly modeled after the recent community engagement process in NYC District 15).
- C. Explore revisions to the lottery system to avoid reinforcing segregation.

- Permitting individual schools to prioritize nearby residents accentuates the impacts of housing segregation and limits access of low income children to proficient schools, because families in those attendance zones take up most or all of the available seats, and because of the relative lack of affordable housing in those school zones. This problem can be partially addressed over time by a strong preference for at risk students in all DC elementary schools, or a set-aside of seats for at risk students in the most proficient schools.

D. Protect students from school displacement.

- Where low income students are displaced from their neighborhood school by economic pressures, DCPS should consider guaranteeing continued access to the school for the displaced students, in much the same way that homeless students are guaranteed a continued seat in the school.

E. Address the lack of student transportation services.

- The lack of student transportation enhances the impact of housing segregation and lack of access to proficient schools. It is unclear why D.C. does not offer transportation for elementary school students, as most other school districts do. For many low income families in Wards 7 and 8, the lack of a yellow school bus means that their elementary school children have no realistic choices in other parts of the city. DCPS may want to consider offering student transportation to elementary school students in the lowest performing schools zones in the city.

F. Improve school ranking systems to avoid reinforcing segregation.

- More nuanced school ranking systems, that give more weight to student diversity, school climate, and yearly progress, and better marketing of a diverse range of schools to new residents of the city could help to expand access to highly proficient schools for low income students and students of color.

## **VII. Expand Outreach and Education around Fair Housing Rights and Resources**

A. Expand Fair Housing Outreach and Education

- The District should provide more resources to outreach and education to ensure that residents know what fair housing means, what protections are offered under fair housing laws, and where they can go to proceed when they have fair housing claims. In particular, the District should expand outreach to stakeholders from marginalized groups such as persons with disabilities, low-income seniors, the LGBTQ community, and immigrant groups to provide education regarding housing discrimination.

- The District, either through OHR or through funding to nonprofit partners, should also direct education efforts at real estate industry trade associations and their members. Education efforts should focus on areas, such as source of income discrimination and criminal background screening, in which District law is stronger than federal law.

#### Increase Fair Housing Enforcement

- OHR should receive more funding and staff capacity to help it to better fulfill its enforcement duties. The District should also consider providing more support for fair housing testing in order to detect subtle forms of housing discrimination, including discrimination on the basis of source of income as well as discrimination against traditionally overlooked groups such as LGBTQ seniors.

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## VII. Glossary

Throughout this document you will find specialized terms used to describe some of the research and findings. Please take a few minutes to familiarize yourself with some of the words and the way they are being defined and used in this Analysis of Impediments to Fair Housing Choice.

**Accessibility:** Whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers. See: TTY

**Affirmatively Further Fair Housing (AFFH):** A legal requirement under the Fair Housing Act that federal grantees (including states, local governments, and public housing authorities) take meaningful action to overcome historic patterns of residential segregation, promote housing choice, and foster inclusive communities.

**American Community Survey (ACS):** A survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

**Americans With Disabilities Act (ADA):** Federal civil rights law that prohibits discrimination against people with disabilities.

**Annual Action Plan:** An annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan. See also: Consolidated Plan.

**Capital Improvement Plan:** A short-range plan, usually four to ten years, which identifies capital projects and equipment purchases, provides a planning schedule and identifies options for financing the plan.

**CDBG:** Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

**Census Designated Places:** A label assigned by the Census Bureau to communities that resemble cities or towns, but which are not formally incorporated and do not have their own municipal government. See: Unincorporated Land.

**Census Tract:** Small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

**Consent Decree:** A settlement agreement that resolves a dispute between two parties without admitting guilt or liability. The court maintains supervision over the implementation of the consent decree, including any payments or actions taken as required by the consent decree.

**Consolidated Plan (Con Plan):** A plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

**Continuum of Care (CoC):** A HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

**Data and Mapping Tool (AFFHT):** An online HUD resource combining data from various sources including HUD, the decennial Census data and the American Community Survey to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

**DC (“the city”):** As used throughout this document’s fair housing analysis, the terms “DC”, and “the city” refer to the District of Columbia (Washington, DC).

**DC Human Rights Act:** A District of Columbia law that prohibits discrimination in housing, employment, public accommodations, and educational institutions based on protected traits.

**Density Bonus:** An incentive for developers that allows developers to increase the maximum number of units allowed at a building site in exchange for either affordable housing funds or making a certain percentage of the units affordable.

**Disparate Impact:** Housing practices that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

**Dissimilarity Index:** Measures the percentage of a certain group’s population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city’s Black/White Dissimilarity Index was 65, then 65 percent of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

**District:** As used throughout this document’s fair housing analysis, “District” refers to the government of the District of Columbia.

**East of the River:** The areas of the District of Columbia east of the Anacostia River, which includes Ward 8 and most of Ward 7.

**ESG:** Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

**Environmental Health Index:** A HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

**Environmental Justice:** The fair treatment and meaningful involvement of all people, especially people of color, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making people of color more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

**Exclusionary Zoning:** The use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

**Exposure Index:** A measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

**Fair Housing Act:** A federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

**Federal Uniform Accessibility Standards (UFAS):** A guide to uniform standards for design, construction, and alternation of buildings so that physically handicapped people will be able to access and use such buildings.

**Gentrification:** A general term for a process of neighborhood change that involves an influx of investment and more affluent residents into an existing neighborhood. Gentrification often causes a rise in property values, home prices, and rents. Additionally, gentrification is characterized by changes in a neighborhood's character and culture as well as changes in land use towards the development of more offices, high-end housing, retail, and restaurants. Often, these effects lead to demographic changes as lower-income families are displaced from a neighborhood and middle-class households move in. These demographic changes may include an increase in neighborhood median income, a decline in the proportion of people of color, and a reduction in household size as low-income families are displaced.

**HOME:** HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building,

buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

**HOPWA:** Housing Opportunities for Persons With AIDS. HUD makes grants under the HOPWA program to local communities, states, and nonprofits for projects that benefit low-income people living with HIV/AIDS and their families

**Housing Choice Voucher (HCV):** A HUD rental subsidy issued to a low-income household that promises to pay a certain amount of the household's rent. Prices, or payment standards, are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Participants of the HCV program are free to choose any rental housing that meets program requirements

**Housing Discrimination:** The refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lessee based on that person's race, class, sex, religion, national origin, or familial status.

**HUD:** The United States Department of Housing and Urban Development.

**HUD Grantee:** A jurisdiction (city, country, consortium, state, etc.) that receives money from HUD.

**Inclusionary Zoning:** A zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

**Individuals With Disabilities Education Act (IDEA):** A federal civil rights law that ensures students with a disability are provided with Free Appropriate Public Education that is tailored to their individual needs.

**Isolation Index:** A measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

**Jobs Proximity Index:** A HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

**Labor Market Engagement Index:** A HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

**Limited English Proficiency (LEP):** Residents who do not speak English as a first language, and who speak English less than "very well."

**Local Data:** Any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey.

**Low Income Housing Tax Credit (LIHTC):** Provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

**Low Poverty Index:** A HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

**Low Transportation Cost Index:** A HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

**Market Rate Housing:** Housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

**Moving to Work (MTW):** A HUD demonstration program that gives certain public housing authorities greater flexibility with how they use federal funds as well as the ability to obtain waivers from federal statutes and rules governing the public housing and HCV programs.

**NIMBY:** Not In My Back Yard. A social and political movement that opposes housing or commercial development in local communities. NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to neighborhood character to, in some cases, racial bias.

**Poverty Line:** The minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The federal poverty line for a family of four is \$25,750.

**Project-Based Section 8, Project-Based Rental Assistance, PBRA:** A government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

**Public Housing:** Housing that is owned and managed by a Public Housing Authority for eligible low-income households.

**Publicly Supported Housing:** Housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

**Other Multi-Family Housing:** Multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units include

properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

**Quintile:** Twenty percent of a population; one-fifth of a population divided into five equal groups

**Reasonable Accommodation:** A change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

**R/ECAPs:** Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink.

**Region:** As designated by HUD, the District of Columbia is located within the Washington-Arlington-Alexandria Region. This region includes the District of Columbia and five Maryland Counties (Calvert, Charles, Frederick, Montgomery, and Prince George's). The region also includes 11 Virginia counties (Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren) as well as six Virginia cities (Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, and Manassas Park). Jefferson County in West Virginia is also included in this definition of the Washington region.

**Rehabilitation Act (Section 504):** A federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

**Rent Control:** A form of price control that limits the amount a property owner can charge for renting out a home, apartment, or other real estate. Rent can be controlled by setting a maximum dollar amount, or by setting a maximum percentage increase when rents are raised. The Rental Housing Act of 1985 is the rent control law in the District of Columbia.

**School Proficiency Index:** A HUD calculation based on performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

**Segregation:** The separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

**Source of Income Discrimination:** For purposes of this analysis, housing discrimination based on whether a potential tenant plans to use a Housing Choice Voucher/Section 8 Voucher to pay part of their rent. Increasingly, cities and states are outlawing source of income discrimination. See also: Housing Choice Voucher/Section 8 Voucher.

**Superfund Sites:** Any land in the U.S. that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment

**Supplemental Security Income (SSI):** Benefits paid to disabled adults and children who have limited income and resources, or to people 65 and older without disabilities who meet the financial limits.

**Testers:** People who apply for housing to determine whether the landlord is illegally discriminating. For example, Black and White testers will both apply for housing with the same landlord, and if they are treated differently or given different information about available housing, their experiences are compared to show evidence of discrimination.

**Transit Trips Index:** A HUD calculation that estimates transit trips taken for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the more likely residents in that neighborhood utilize public transit.

**TTY/TDD:** Text Telephone/Telecommunication Device for the Deaf. TTY is the more widely used term. People who are deaf or hard of hearing can use a text telephone to communicate with other people who have a TTY number and device. TTY services are an important resource for government offices to have so that deaf or hard of hearing people can easily communicate with them.

**Unbanked:** Individuals who are not served by a financial institution.

**Underbanked:** An area that does not have enough banks to meet market demand

**Upper Northwest:** In this analysis, Upper Northwest refers to neighborhoods in the Northwest Quadrant of the city that are west of Rock Creek Park such as Chevy Chase, Spring Valley, and Tenleytown.

**Violence Against Women Act (VAWA):** A federal law protecting women who have experienced domestic and/or sexual violence. The law establishes several programs and services including a federal rape shield law, community violence prevention programs, protections for victims who are evicted because of events related to domestic violence or stalking, funding for victim assistance services, like rape crisis centers and hotlines, programs to meet the needs of immigrant women and women of different races or ethnicities, programs and services for victims with disabilities, and legal aid for survivors of domestic violence.

# Appendix: Free Market Analysis

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## Free Market Analysis<sup>314</sup>

This section presents a “free market analysis” designed to aid understanding of some of the ways in which discrimination distorts the housing market and results in segregation, by examining the degree to which race or ethnicity shape residents’ housing locations *even apart from the effect of* housing cost and household income.

More than 40 years ago, the U.S. Commission on Civil Rights described the origins of the dual housing market which were deeply rooted in the institutional and individual housing discrimination that reflected the common racial attitudes among Caucasians throughout the nation’s history. The dual housing market did not come about by accident.

“It is the real estate brokers, builders and the mortgage finance institutions which translate prejudice into discriminatory action.... The housing industry, aided and abetted by government, must bear the primary responsibility for the legacy of segregated housing.”<sup>315</sup>

Throughout the nation, long-term private and public sector interaction have produced a dual housing market in which whites can live anywhere they can afford while most people of color, especially African Americans, are largely limited to integrated neighborhoods and segregated minority areas — no matter what they can afford to pay for housing.<sup>316</sup> This dual housing market has remained largely intact today throughout most of the country, although cracks in it have been appearing.<sup>317</sup>

To accomplish this in the District of Columbia, it is necessary to first identify the actual extent of racial and Hispanic segregation, if any, within each of the city’s census tracts which the city has organized into 39 neighborhood clusters for planning purposes. It involves examining the city’s racial and Hispanic demographics within the regional housing market of which the District of Columbia is the center. The Free Market Analysis™ factors in the actual cost of housing in each census tract and neighborhood cluster. It then approximates how many households of each race or Latino ethnicity of any race have enough household income to live in the dwellings in that census tract

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<sup>314</sup> This subsection provides a summary of the full Free Market Analysis accompanying this document.

<sup>315</sup> U.S. Commission on Civil Rights, *Understanding Fair Housing*, Clearinghouse Publication 42. (Washington, DC: U.S. Commission on Civil Rights. 1973) 3.

<sup>316</sup> While the dual housing market has limited the housing choices of nearly all “people of color” to “minority” and integrated neighborhoods, African Americans have faced the most extensive and rigid limitations on where they can live — a phenomenon that might be called the “classic dual housing market.” Caucasians, meanwhile, can live anywhere they can afford to live which gives them greater access to places of higher opportunity. For full details on the many factors that produced and maintain the dual housing market that perpetuates racial segregation in the United States, see Richard Rothstein, *The Color of Law: A Forgotten History of How Our Government Segregated America*, (New York: Liveright Publishing Company, 2017); Daniel Lauber, *Ending American Apartheid: How Cities Achieve and Maintain Racial Diversity* (River Forest, IL: Planning/Communications, 1990, 2019). It is available as a PDF file under its original at <http://planningcommunications.com>. Click on the “Publications” button.

<sup>317</sup> See Institute on Race and Poverty, *Minority Suburbanization, Stable Integration, and Economic Opportunity in Fifteen Metropolitan Regions* (Minneapolis, MN: University of Minnesota Law School, Feb. 2006). This study found that the same private and public sector practices that created and maintain the dual housing market as reported in *Ending American Apartheid...* are still occurring. Available at <http://www1.law.umn.edu/metro/metro-area-studies/integration-and-segregation.html>.

or neighborhood cluster. By controlling for ability to pay rent or a mortgage, the Free Market Analysis™ identifies demographic differences that likely result from housing discrimination and/or gentrification.

These income and housing cost factors are accounted for in the Free Market Analysis™ that follows the examination of the regional context. The Free Market Analysis™ seeks to provide the District of Columbia with a granular picture of the extent of any actual racial and/or Hispanic segregation so the city can adopt and implement the policies and programs that remove the artificial public and private sector barriers to racial, economic, and Latino integration.

### **How Discrimination Distorts the Free Market in Housing**

Racial and ethnic or national origin discrimination badly warp the free market in housing by *artificially* creating a dual housing market that reduces demand for housing in some neighborhoods from a racial or ethnic group(s), and *artificially* increases demand in other neighborhoods from a racial or ethnic group(s) — which helps thwart a jurisdiction’s efforts to affirmatively further fair housing, alongside other policies and practices that segregate or discriminate due to income. The classic dual housing market separates white and African American households.<sup>318</sup> Research has found that thanks to lingering stereotypes about African Americans and to other elements of racism, Caucasians tend to limit their home search to neighborhoods that are virtually all white and won’t even look at housing in integrated neighborhoods that are more than 15 percent Black.<sup>319</sup> If whites won’t even consider living in an integrated neighborhood, re-segregation to virtually all-Black becomes inevitable because, with Caucasian demand gone, nearly every new resident of the integrated neighborhood will be African American.<sup>320</sup>

That attitude contributes to the existence of the classic dual housing market, a primary and geographically broad housing market in which whites participate and a separate and inherently unequal geographically limited housing market just for African Americans. Asians and Latinos of any race straddle the two housing markets, in some regions and towns fully participating in the same primary housing market as Caucasians and in other places participating mostly in the same narrower housing market as Black households. The data for the District of Columbia suggest that Asian households and Hispanic households of any race participate in the primary white housing market.

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<sup>318</sup> Prior to the growth in immigration from Asia and Latin America, the “classic” dual housing market was between Caucasian and African American households. Public and academic discussions centered on the racial segregation generated by the housing discrimination that produced the dual housing market. While the dual housing market is now often between Caucasians and people of color, *African Americans remain far more segregated than Asians or Hispanics of any race*. The discussion of the dual housing market here is focused on the classic dual housing market which has generated the more extreme levels of housing segregation of the nation’s Black population.

<sup>319</sup> Some of these studies are discussed in Douglas Massey and Nancy Denton, *American Apartheid: Segregation and the Making of the Underclass* (Cambridge: Harvard University Press, 1993) 88–96. Also see the sources cited in the paragraphs that follow the one this footnote appears.

<sup>320</sup> See the discussion and sources cited on pages 12–15 in Daniel Lauber, *Ending American Apartheid: How Cities Achieve and Maintain Racial Diversity* (River Forest, Illinois: Planning/Communications, 1990, 2019) available at <http://www.planningcommunications.com>. Click on the “Publications” button.

Researchers have reported that, around the country, African Americans strongly prefer living in an integrated neighborhood rather than an all-black or virtually all-white neighborhood. More than one-third of Blacks say they are willing to be the first African American family to move into an exclusively white neighborhood. But more than 150 years of housing discrimination have led to self-steering, especially among African Americans who report they are apprehensive and even fearful of moving into a neighborhood where their numbers are very low.<sup>321</sup>

A pre-eminent study of this subject explains further:

We must strongly caution that while people of color often decide to buy or rent in segregated minority communities this should not be seen as representing a widespread African American or Latino desire to live in separate communities. Quite to the contrary, even where there is self-selection and an attraction to substantial African American or Latino communities, *it is a function of the discomfort that many minority group members have felt or believe they will feel if they move into a pre-dominantly-white, Anglo community.* It is a result of the continued perception and experience of discriminatory behavior.

It has been reported that many non-whites, especially African Americans, avoid living in overwhelmingly white neighborhoods because they expect discrimination of some type by whites will reduce their quality of life. These concerns have been shaped by current and past discrimination. Feelings of discomfort of living together may be fueled by a segregated society that has afforded few opportunities to do so.<sup>322</sup>

Racial and ethnic or national origin discrimination in housing also distorts property values. African Americans or Hispanics, for example, who live in Black or Latino enclaves pay a substantial price in lost housing value and, consequently, household wealth. It is well documented that the value and appreciation of homes in segregated minority neighborhoods is generally less than in stable integrated areas and predominantly white areas.<sup>323</sup> The housing discrimination that

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<sup>321</sup> See M. Krysan, M. Couper, R. Farley, T. Forman, "Does Race Matter in Neighborhood Preferences? Results from a Video Experiment," in *American Journal of Sociology* (Sept 2009) 527–559; Robert Adelman, "The Roles of Race, Class, and Residential Preferences in the Neighborhood Racial Composition of Middle-Class Blacks and Whites" in *Social Science Quarterly*, (Vol. 86, No. 1, March 2005) 209–228; Anti-Discrimination Center, *They're Our Neighbors, Too: Exploding the Myth That Most Affordable Housing Seekers in Highly Segregated New York City Insist on Staying Close to Home* (New York, NY: Anti-Discrimination Center, June 2015), available to download at <http://www.antibiaslaw.com/mobility>; M. Krysan and R. Farley, "The Residential Preferences of Blacks: Do They Explain Persistent Segregation?" in *Social Forces* (Vol. 80, No. 3, March 2002), 937–980; Maria Krysan, "Community Undesirability in Black and White: Examining Racial Residential Preferences through Community Perceptions," *Social Problems* (Vol. 49 No. 1) 521–543.

<sup>322</sup> See generally Joe Feagin, *Living with Racism: The Black Middle-Class Experience* (Boston: Beacon Press, 1995) and Myron Orfield and Thomas Luce, *America's Racially Diverse Suburbs: Opportunities and Challenges* (Minneapolis, MN: Institute on Race and Poverty, University of Minnesota Law School, July 20, 2012) 34. Available at <http://www1.law.umn.edu/metro/metro-area-studies/integration-and-segregation.html>.

<sup>323</sup> Analyzing the nation's 100 largest metropolitan areas in 1990, David Rusk found that the home values of African American homeowners were 18 percent lower than those of their white counterparts, controlling for income. The more segregated the metropolitan area, the wider the racial gap in home values. Rusk calls this a "segregation tax" imposed on Black homeowners. See David Rusk, *The 'Segregation Tax': The Cost of Racial Segregation to Black*

produces racially-segregated neighborhoods trigger disinvestment in these communities with African Americans and other people of color bearing the costs.

### **Introduction to the Free Market Analysis™**

As the tables in the Free Market Analysis™ that follow show, the racial and/or Hispanic composition of some census tracts and neighborhood clusters that appear to be racially segregated are actually about what would be expected in a unitary, free housing market. Discrimination is likely a major contributing cause of an area's racial and ethnic composition when the actual racial and Latino composition differs significantly from what the makeup would be in a single, unitary free housing market not distorted by discrimination. For example, it is likely that past and/or present discrimination based on race significantly contributes to a census tract being 90 percent African American when the tract would be expected to be 54 percent Black when household income and the cost of existing housing are taken into account.

The Free Market Analysis™ does not produce indices that can be compared between jurisdictions. Instead it pinpoints the geographic areas within a jurisdiction where segregation exists, identifies the direction in which the demographic composition of the geographic area has been moving since the turn of the century, and shows what the demographic composition of the area would be in the absence of individual or institutional housing discrimination.

The approach used in this analysis compares the actual racial and Hispanic of any race/ethnic composition of a census tract with what the *approximate* racial and Latino of any race composition would be in a unitary free housing market *not distorted* by practices such as racial steering; racial or national origin discrimination in showing, renting, or selling dwellings; mortgage lending discrimination; discriminatory advertising; discriminatory rental policies; mortgage or home insurance redlining; or discriminatory appraisals.

The tables below show (1) the current racial and Hispanic composition of households and (2) an approximate racial composition that accounts for household income and housing costs were the predominant determinants of residency in a genuine unitary free market *without* the distortions that discriminatory practices generate. The tables show this information for 2000 and for 2013–2017, thus depicting trends over time — enabling readers to see whether a census tract and neighborhood cluster has been moving in an integrative or segregative manner since the turn of the century. *When the actual proportions of minorities are significantly less than the proportions that would exist in a free housing market, it is very likely that factors other than income, social class, or personal choice are influencing who lives in the community.* Researchers have concluded “that race and ethnicity (not just social class) remain major factors in steering minority families away from some communities and toward others.”<sup>324</sup>

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*Homeowners* (Washington, DC: The Brookings Institution, Center on Urban and Metropolitan Policy Survey Series, October 2001).

<sup>324</sup> *Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region*, v. The methodology, first developed by Harvard economist John Kain, is explained in detail beginning on page 17 of the study cited immediately above. You can download the study at <http://www.planningcommunications.com/black-white-and-shades-of-brown.pdf>.

Analyses of the degree of segregation and integration in a jurisdiction are confounded by significant differences in median household income between different racial and ethnic groups. The analysis below approximates neighborhood-level racial and ethnic composition after controlling for income and housing cost. Many people mistakenly assume that housing stratification is due primarily to different income levels and self-steering, assumptions *not* borne out by data or well-informed research and analysis. An analyses that controls for differences in household income and the costs of rental and ownership housing is thus helpful in understanding the causes of racial and Latino segregation in a jurisdiction.

### **Free Market Analysis™ Methodology**

By taking household income into account, the analysis that follows identifies possible racial and Latino concentrations while taking household income into account, reporting the proportions of each racial or ethnic group within a neighborhood cluster or census tract. There is a common misconception that housing is segregated only or primarily because minority households earn less than white households.

Data employed for this analysis come from the *2013–2017 American Community Survey 5–Year Estimates* and from the 2000 Decennial Census.<sup>325</sup>

The step-by-step procedure described here uses a census tract to illustrate this process. First, we identify the number of current households in each of 16 income ranges, starting with “Less than \$10,000,” “\$10,000 to \$14,999,” and “\$15,000 to \$19,999.” At the top end of the income spectrum are the highest income ranges of “\$125,000 to \$149,999,” “\$150,000 to \$199,999,” and “\$200,000 or more.” This process gives us the *actual* number of households in each income range that live in the census tract.

The next step identifies the *total* number of households in the District of Columbia’s regional housing market in each of these 16 income ranges. It also reports the number of households of each race and “Hispanics of any race” in each of these income ranges. (The District’s regional housing market consists of the Washington DC–Arlington, VA–Alexandria, VA–Maryland–West Virginia Metropolitan Statistical Area). From these data, we calculate the percentage of each race and “Latinos of any race” in each of the 16 income ranges for the metropolitan statistical area. For example, in the \$75,000 to \$99,999 annual income range for the entire metropolitan statistical area, 57.1 percent of these households (157,288) are white, 26.9 percent (74,121) are African American, 8.1 percent (22,221) are Asian, and 12.5 percent (34,304) are of Hispanic ethnicity.<sup>326</sup> These add up to more than 100 percent because households of “Hispanic” ethnicity can be of any race.

Third, we multiply the total number of households in the subject census tract by the percentage of each race or ethnicity in that income range, resulting in predicted tract counts of each race/ethnicity in each income range.

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<sup>325</sup> The 2000 census was the last decennial census to ask for household income. Since then the income question has been relegated to the American Community Survey.

<sup>326</sup> The proportions of all groups have increased since the 2010–2013 *American Community Survey*’s five-year estimates for 2010–2013 except for white households which declined by 2.4 percentage points.

Fourth, for each race/ethnicity we aggregate these predicted counts across the income ranges to obtain the total predicted number of each race/ethnicity expected to live in the census tract absent housing discrimination, given the existing tract household income distribution and the cost of housing.

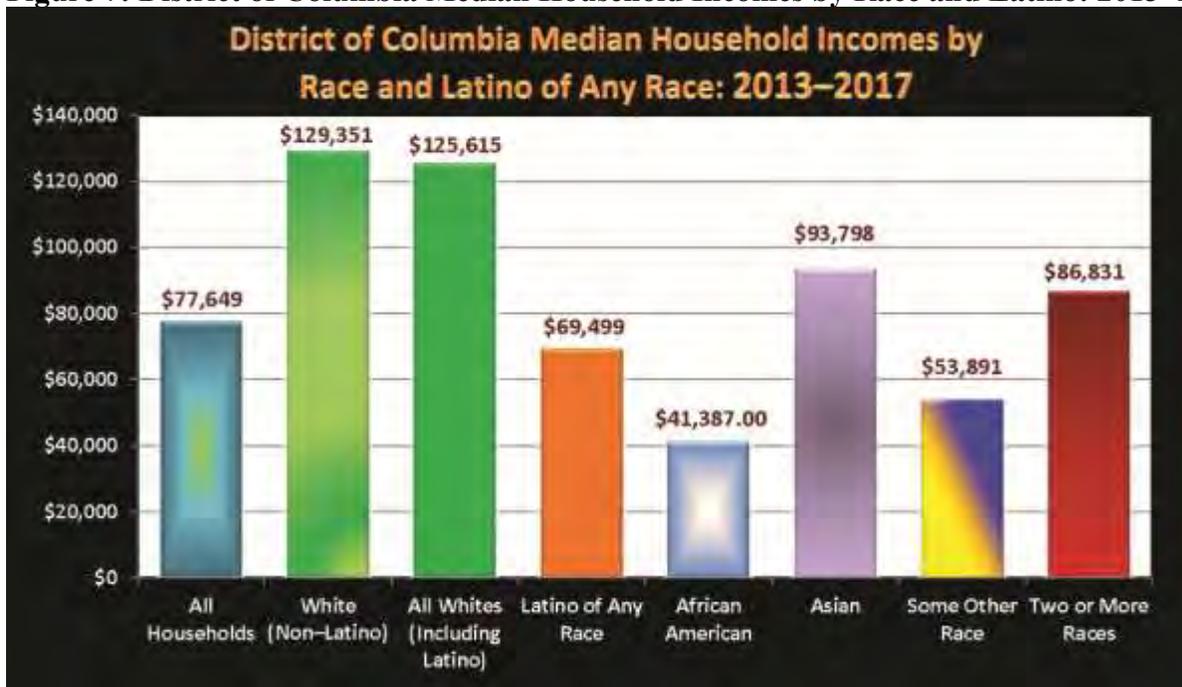
Finally, we divide these predicted race/ethnic totals by the census tract count of households to obtain predicted census tract proportions of each race/ethnicity. Tables below depict differences between these expected proportions and the actual proportions.

As Figure 7 shows, the median annual household income in the District of Columbia varies substantially by race and ethnicity, with non-Hispanic whites possessing the highest median household income, followed by all Whites and Asians. While the median household income in the District of African Americans, Latinos of any race, and the other categories are notably lower than for whites and Asians, they are still higher than for the nation as a whole. However, the median income of Black households in the District was barely higher than for the nation.<sup>327</sup>

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<sup>327</sup> Nationally, median household incomes were \$57,662 for all households; \$62,256 for white (non-Latino); \$61,663 for all whites; \$46,627 for Latinos of any race; \$38,183 for African Americans; \$80,398 for Asians; \$44,168 for “some other race;” and \$52,296 for “two or more races.” *2013–2017 American Community Survey 5–Year Estimates*, Table S1903.

**Figure 7: District of Columbia Median Household Incomes by Race and Latino: 2013–2017**



The lower annual median incomes of the city’s African American and Hispanic households certainly contribute to the demographic patterns reported in the Free Market Analysis™. However, the analysis controls for these income differences by explicitly taking into account household income to approximate the racial and ethnic composition of each neighborhood cluster and its census tracts if racial and ethnic discrimination were absent and household income and the cost of existing housing were the primary determinants of where a household lives in a single, unitary free housing market.

The results below portray neighborhood racial concentration due to discrimination and other factors, after housing costs and household incomes are taken into account.

### **Understanding and Using the Free Market Analysis™**

Tables below provide the following information for each neighborhood cluster and each census tract, for 2000 and 2013–2017:<sup>328</sup>

- “Actual Proportion”: The actual proportion of households of each race and Hispanic ethnicity of any race
- “Free Market”: The approximate proportion of households of each race and Latino ethnicity of any race when income and the cost of housing are the primary determinants of residence
- “Difference”: “Free Market” minus “Actual Proportion.” For each race/ethnicity, the

<sup>328</sup> Because the Decennial U.S. Census no longer asks for household income, we had to use household income from the 2013–17 American Community Survey Five-Year Estimates for 2013–2017. Due to their larger sample size, the five-year estimates are more reliable than the one-year and three-year estimates.

size of this difference suggests whether past and/or current discrimination distorts the housing market in the census tract or neighborhood cluster. When the “Difference” is negative, the proportion actually living in the tract or cluster is less than what would be expected in a unitary free market absent discrimination. When the “Difference” is positive, the proportion living in the tract or cluster is greater than what would be expected in a unitary free housing market.

In the Free Market Analysis™ tables that follow, a “Difference” between actual and expected proportions that suggests distortions of the free housing market that is likely due to past and/or present racial discrimination is highlighted with a red or yellow cell. A “Difference” that is 15 or more percentage points is so substantial a gap that it *almost certainly* reflects current and/or past housing discrimination that produces a dual housing market — those cells are highlighted in red. A smaller gap of 10 to 14.9 percentage points suggests it is *highly likely* that this difference is due to current and/or past discriminatory practices that generate a dual housing market — those cells are highlighted in yellow. The greater the gap, the greater the likelihood that a dual housing market exists thanks to past and/or current housing discrimination.

Other researchers have concluded that differences of just five percentage points indicate that discrimination is distorting the housing market.<sup>329</sup> This analysis uses these higher thresholds of 10 and 15 percentage points to allow for the margins of error in the household income data for 2013–2017 because it comes from the five–year estimates of the *American Community Survey* and to factor in first generation immigrants and other minority households that choose to live in a predominantly minority neighborhood.

A high proportion of minority households in a jurisdiction or census tract is *not necessarily* a segregative concentration in terms of the Free Market Analysis. For example, if a census tract’s actual proportion of Hispanic households of any race is 24 percent, it is *not* a concentration when the proportion *expected* in a free housing market is anywhere from 14 to 34 percent (within ten percentage points of the actual proportion). Allowing for the factors note above, differences between actual and expected proportions of households that are *less than 10 percentage points* are considered to be “*within parameters*” because they are close to what would be expected if household income and housing costs were the predominant determinants of where households live in a single, unitary free market without housing discrimination.

### **Placing the District of Columbia Within the Context of Its Region**

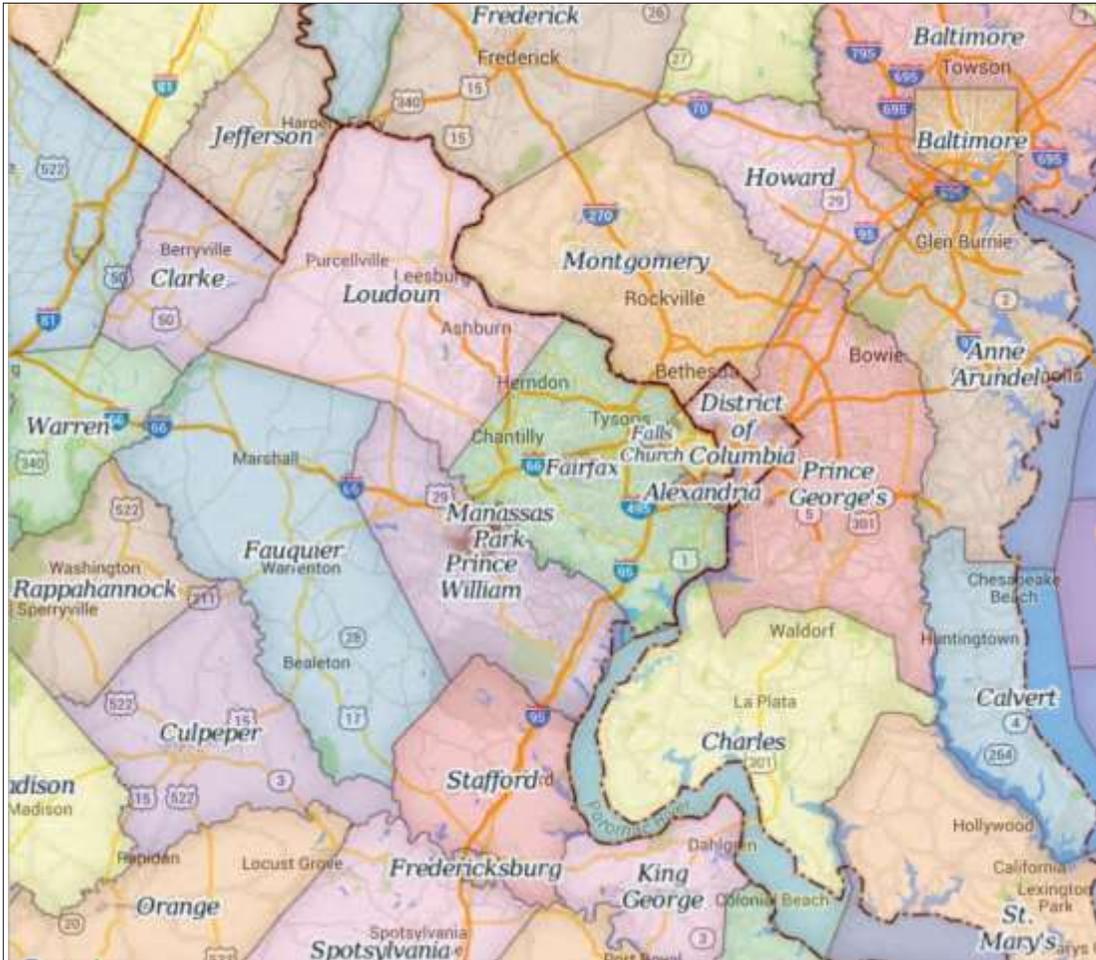
The District of Columbia, of course, is not an island unto itself. The other jurisdictions in the housing market in which the District rests affect the ability of the District to affirmatively further fair housing. The regional housing market that includes the District consists of the “Washington–Arlington–Alexandria, DC–VA–MD–WV Metropolitan Statistical Area.” This full regional housing market includes the entire consolidated metropolitan statistical area in which the District of Columbia sits: 12 Maryland counties, 12 Virginia counties, and two West Virginia counties. The District and the four counties that surround it constitute the heart of the Districts’ housing market. The data and analysis that follow will help identify whether this is a unitary housing market in which households of all races and ethnicities participate, or a dual housing market in

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<sup>329</sup> See *Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region*.

which there is one market in which Caucasians participate and a largely separate market in which the vast majority of African Americans participate. The data also help determine in which housing market or markets Asians and Latinos participate.

**Figure 8: District of Columbia’s Metropolitan Statistical Area and Other Neighboring Jurisdictions**



The table below reports the actual racial/Hispanic composition of households and expected racial/Hispanic composition of households in a free housing market without racial and ethnic discrimination in the District of Columbia; Arlington, Fairfax, Loudoun, and Prince William counties in Virginia; and Charles, Montgomery, and Prince George’s counties in Maryland for 2000 and 2013–2017.

Keep in mind that this analysis incorporates only actual household incomes and actual housing costs. The expected proportions are what would exist with the current housing stock and current household incomes. *Consequently, it reports what racial and Hispanic compositions would be of households that can afford current housing prices in the District of Columbia and the nearby counties.*

In the table immediately below, the data for an entire jurisdiction do not address the possible existence of racial or Latino integration or segregation *within* the jurisdiction. It is very possible that the data for an entire county may mask the existence of racial or Hispanic enclaves as well as the exclusion of minority households that can afford the housing from some areas within the jurisdiction.

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**Table 9: Longitudinal Free Market Analysis™ of the District of Columbia and**

Longitudinal Free Market Analysis™ of the District of Columbia and Neighboring Counties: 2000 Through 2017								
Jurisdiction	2000 Census				2013–2017 American Community Survey 5–Year Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>District of Columbia</b>								
Actual Proportion	36.1%	56.0%	2.6%	5.8%	45.6%	44.4%	3.9%	8.5%
Free Market	62.5%	29.1%	4.2%	4.5%	56.2%	28.2%	8.7%	11.0%
Difference	-26.3%	26.9%	-1.7%	1.3%	-10.6%	16.3%	-4.8%	-2.5%
<b>Arlington County, VA</b>								
Actual Proportion	75.3%	8.5%	7.8%	11.2%	75.1%	9.0%	9.6%	11.7%
Free Market	67.9%	23.9%	4.3%	4.3%	60.4%	24.3%	9.0%	10.1%
Difference	7.4%	-15.4%	3.8%	6.9%	14.7%	-15.2%	0.6%	1.6%
<b>Charles County, MD</b>								
Actual Proportion	70.9%	25.3%	1.0%	1.8%	50.0%	42.9%	2.3%	4.3%
Free Market	67.2%	24.5%	4.3%	4.4%	58.0%	26.4%	8.7%	11.1%
Difference	3.7%	0.8%	-3.3%	-2.7%	-8.0%	16.5%	-6.4%	-6.8%
<b>Fairfax County, VA</b>								
Actual Proportion	75.8%	8.3%	10.2%	7.4%	67.9%	9.6%	16.6%	11.6%
Free Market	71.0%	21.0%	4.4%	4.0%	61.1%	23.6%	9.0%	10.0%
Difference	4.8%	-12.7%	5.8%	3.3%	6.8%	-14.0%	7.6%	1.6%
<b>Loudoun County, VA</b>								
Actual Proportion	85.5%	6.9%	4.1%	3.9%	72.2%	7.5%	14.8%	10.6%
Free Market	70.9%	21.0%	4.4%	4.0%	62.3%	22.6%	9.2%	9.6%
Difference	14.6%	-14.1%	-0.3%	-0.2%	9.9%	-15.1%	5.7%	1.0%
<b>Montgomery County, MD</b>								
Actual Proportion	69.6%	14.7%	9.4%	7.9%	60.3%	17.6%	13.7%	13.5%
Free Market	69.5%	22.4%	4.3%	4.2%	59.6%	25.0%	8.9%	10.6%
Difference	0.1%	-7.7%	5.1%	3.8%	0.7%	-7.4%	4.9%	2.9%
<b>Prince George's County, MD</b>								
Actual Proportion	29.8%	62.6%	3.0%	4.7%	19.5%	67.6%	3.7%	11.1%
Free Market	66.0%	25.7%	4.2%	4.6%	56.4%	27.7%	8.5%	11.9%
Difference	-36.1%	36.8%	-1.3%	0.1%	-36.9%	39.9%	-4.8%	-0.8%
<b>Prince William County, VA</b>								
Actual Proportion	72.3%	18.9%	2.9%	6.7%	62.7%	22.0%	6.8%	16.9%
Free Market	68.3%	23.5%	4.3%	4.4%	59.3%	25.2%	8.8%	10.9%
Difference	4.0%	-4.6%	-1.4%	2.3%	3.4%	-3.2%	-2.0%	6.0%

Sources: Data for 2000 are from 2000 U.S. Census. Data for 2013–2017 are from the American Community Survey, 2013–2017 5–Year Estimates.

## Neighboring Counties: 2000 Through 2017

Of the eight jurisdictions, only Montgomery County, Maryland and Prince William County, Virginia have actual and expected proportions in 2000 and in 2013–2017 that are close enough to suggest both may have a single, unitary housing market in which all races and Hispanics of any race participate. Montgomery County — which has taken steps to achieve racial and economic integration<sup>330</sup> — continues to have an actual racial and Hispanic composition approximately equal to what would be expected in a free housing market absent discrimination.

Prince William County shows additional movement toward a unitary housing market with the actual proportion of African American households increasing a tad and actual proportion of Asian households more than doubling, although the falling barely short of the higher expected proportion in a free housing market. The actual proportion of Hispanic households of any race nearly tripled since 2000 to the point where it is greater than the expected proportion in a free housing market.

Again, these figures are for the *entire* jurisdiction and they do not reflect integration nor segregation *within* a jurisdiction. A local Free Market Analysis™ would be needed to determine the demographic patterns within any of these jurisdictions.

A local Free Market Analysis™ was conducted as part of Fairfax County’s most recent analysis of impediments.<sup>331</sup> It found that while Fairfax County has a very diverse population, “African Americans consistently experience the greatest differences between the actual and expected proportions of households — far more than the differences for Asian, Caucasian, or Hispanic households of any race. Overall the data strongly suggest that while Asian, white, and Hispanic households of any race include the entire county within their housing choices, Fairfax County is relatively rarely among the housing choices of African Americans who can afford Fairfax County housing.”<sup>332</sup> The analysis found that the “actual proportion of Black households is significantly (ten+ percentage points) less than the proportion expected in more than half of the census tracts in ten of Fairfax County’s 14 planning districts.”<sup>333</sup>

Overall, in Fairfax County, the total actual proportions of whites, Asians, and Latinos of any race are roughly what would be expected when they can live wherever they can afford the housing. However, the analysis also found that “there are indications that concentrations of Asian or Hispanic households of any race are spreading and intensifying in portions of Fairfax County” possibly due to first generation immigrants deliberating locating in racial or ethnic enclaves.<sup>334</sup>

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<sup>330</sup> Contributing to this success has been nearly 40 years of Montgomery County’s mandatory inclusionary zoning law (called the “Moderately Priced Dwelling Unit Program”) which has produced more than 12,000 dwellings affordable to households with modest incomes, including over 1,000 units of public housing — all 12,000 of which have been scattered throughout the county.

<sup>331</sup> Planning/Communications, *Fairfax County, Virginia Analysis of Impediments to Fair Housing Choice 2016–2020* (River Forest, IL: Sept. 2017) 54–145.

<sup>332</sup> *Ibid.* 140.

<sup>333</sup> *Ibid.*

<sup>334</sup> *Ibid.* 145.

The data for Arlington County, Virginia show virtually no change in the actual proportions of each demographic group since the turn of the century. With the expected proportion of white households declining since 2000, the proportion of Caucasian households is now significantly greater than would be expected in a free housing market devoid of discrimination. Coupled with the actual proportion of Black households remaining about 15 percentage points lower than would be expected, it is very likely that African Americans still face housing discrimination in Arlington County.

Loudon County, Virginia presents a more complicated and nuanced picture than Arlington County. In Loudon County, the difference between the actual and expected proportions of Caucasian households declined by nearly five percentage points since 2000. While difference between actual and expected proportions of Black households increased by a single percentage point, this 15.1 percentage point difference continues to suggest that African American households encounter barriers to moving to Loudon County that no other group faces.

The pace of resegregation in Prince George's County from virtually all-white to overwhelmingly Black has slowed this century. The differences between actual and expected proportions of Caucasian and African American households are more extreme than in the District of Columbia — and not improving. The actual and expected proportions of Asian households and Latino households of any race continue to be what would be expected.

Immediately south of Prince George's County is Charles County, Maryland which is showing classic signs of resegregation. The actual proportion of African American households grew from 25.3 percent in 2000 to 42.9 percent in 2013–2017. While the actual proportion in 2000 was what would be expected in a unitary free housing market absent discrimination, the actual proportion in 2013–2017 was about 16.5 percentage points greater than would be expected. This significant change strongly suggests that Charles County is in the early throes of the same sort of resegregation that Prince George's County has experienced. There is a strong suspicion that financially better off African American households are moving to Charles County rather than remain in the District.

In the District of Columbia and six of the eight counties, the gaps between actual proportions of Black households and expected proportions in a free housing market are large enough to suggest the presence of a dual housing market, one for African Americans and one for everybody else.

The most severe differences are in the District of Columbia, where portions of the city have been moving toward integration since at least the turn of the century, and adjacent Prince George's County, Maryland which has continued to resegregate as African Americans within the region have concentrated there and whites have moved out.

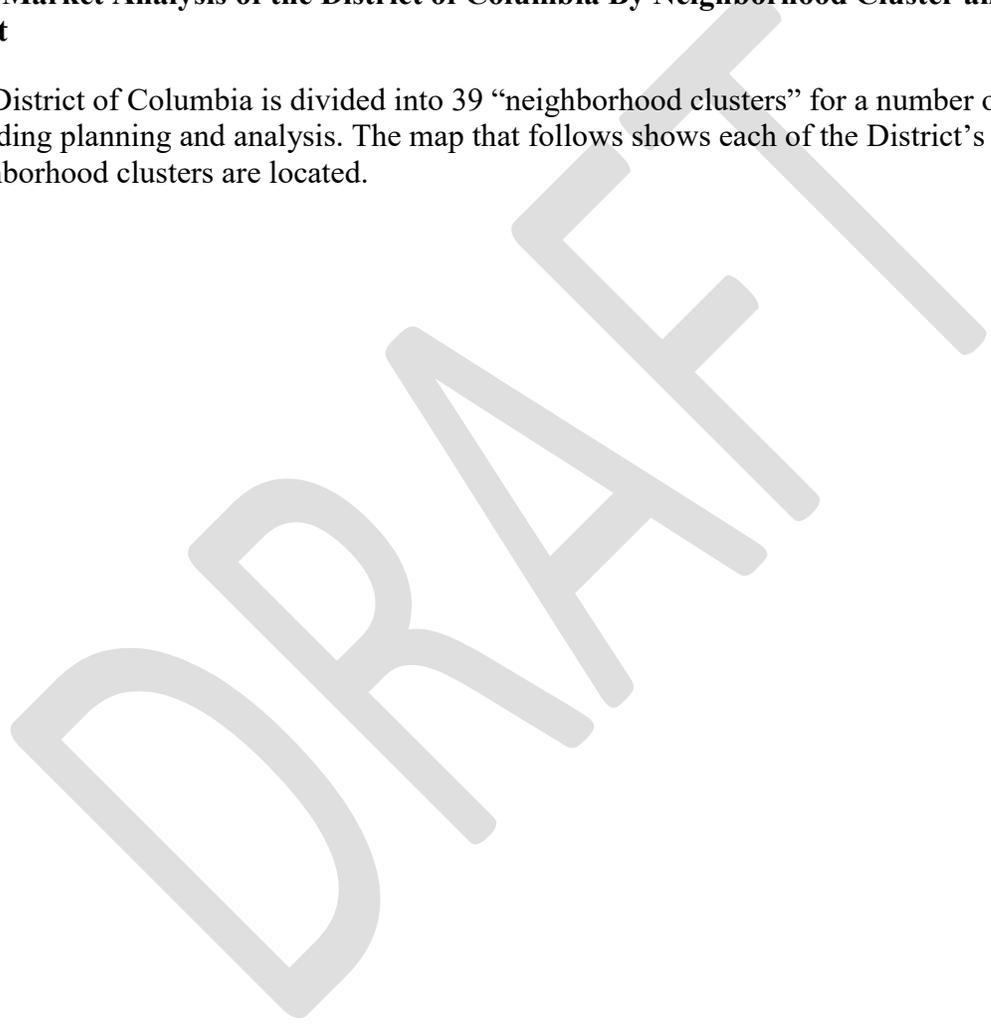
The citywide figures for the District mask the extreme intensity of racial segregation in much of our nation's capital. While much of the District has become more diverse *and* integrated since 2000, many of its neighborhood clusters that were intensely segregated in 2000 became even more segregated. African Americans are concentrated largely in the city's southeast quadrant where apartheid levels of segregation continue to exist. This Free Market Analysis™ will look

very closely at each of the District’s 39 neighborhoods clusters to remove the mask that citywide figures create.

The bottom line, however, is that the data strongly suggest that a dual housing market exists in the region in which the District of Columbia is located. Overcoming this barrier to fair housing choice requires a multi-pronged local and regional approach. Any efforts to mitigate it will require regional intergovernmental cooperation as a component in addition to the efforts that the District undertakes itself.

### **Free Market Analysis of the District of Columbia By Neighborhood Cluster and Census Tract**

The District of Columbia is divided into 39 “neighborhood clusters” for a number of reasons including planning and analysis. The map that follows shows each of the District’s 39 neighborhood clusters are located.



**Figure 10: Map of District of Columbia Neighborhood Clusters**



**Free Market Analysis™ of the District of Columbia**

Note that many census tracts that existed in 2000 no longer exist in 2013–2017. Some Census 2000 tracts were divided into multiple tracts for the 2010 census and beyond. Some new tracts were created by merging all or parts of several Census 2000 tracts. These are noted in the neighborhood cluster tables. The tables also note when block group data for 2013–2017 were not available or were too small to be reliable. Some census tracts in the District contain very few

households. The tables do not include data for tracts with fewer than 200 households — that small a sample for 2013–2017 simply isn’t reliable enough.

Also note that some census tracts contain a substantial number of individuals living in “group quarters” such as institutions, military facilities, dormitories, jails, and prisons. Data for group quarters are not included in this Free Market Analysis™ because these are occupied by individuals, not households, and are not part of the region’s housing market.

### **Key Differences from the Free Market Analysis™ in the 2006–2010 Analysis of Impediments**

This Free Market Analysis™ is more finely tuned than the analysis in the District’s 2006–2010 Analysis of Impediments to Fair Housing Choice. The earlier analysis did not have access to household income data for 2010. Instead of using actual and expected free market proportions of households for 2010, it had to use proportions of individuals for 2010 as an approximation of the actual proportions of households for each race and Hispanics of any race. While the proportions of individuals are pretty good approximations of households, they are not as exact as using actual households as we were able to do for this analysis. Consequently, the Free Market Analysis™ in this study is more precise and fine tuned.

In the tables for the previous Free Market Analysis™, differences between actual and free market proportions of ten or more percentage points were highlighted in dark yellow as the more serious differences. Differences close to ten percentage points were highlighted in light yellow as concerning. Recognizing that there is a margin of error in the estimates of the American Community Survey’s five–year samples, it was decided to be a bit more cautious and highlight in red those cells where the difference is 15 or more percentage points as areas that *almost certainly* reflect current and/or past housing discrimination that produces a dual housing market, and to highlight in yellow those cells with differences of 10 to 14.9 percentage points as areas in which it is *highly likely* that this difference is due to current and/or past discriminatory practices that generate a dual housing market.

## Why the percentages do not equal 100 percent

The percentages in the Free Market Analysis™ tables rarely total 100 percent for several reasons.

The category “Hispanic of Any Race” is an ethnicity. Latinos can be of any race. Adding up all the percentages in a row in the neighborhood cluster tables counts Hispanics twice. Forty-four percent of the District’s Latino population also report themselves to be Caucasian with just 8.2 percent also reporting as African American, 0.7 percent also as Asian, and 0.2 percent also as Native American or Alaska Native. Forty percent also report themselves to be “some other race” and 0.6 percent also report themselves as “two or more races.”

The tables do not include “Native Hawaiian and Other Pacific Islander” and “American Indian and Alaska Native” because the number of households in these racial classifications is so small that they would not alter the findings and analysis and are too small to be reliable.

The tables do not include “Some other race” or “Two or more races” because they would make the tables extremely complicated, introduce more double counting, and they have unacceptable margins of error. We have found in the past that including those categories does *not* alter the findings and analysis.

## How to Get the Most Out of this Free Market Analysis™

The data in each table help determine whether each neighborhood cluster and census tract within a cluster is likely part of a unitary free housing market or dual housing market generated by past and/or current discrimination. The following tips will help readers get the most out of the data and analysis.

- Comparing the year 2000 “**Actual Proportion**” row for a neighborhood cluster or census tract with its “Actual Proportion” row for 2013–2017 shows **the direction in which the district or tract has been moving** since 2000, namely whether it has been moving in an integrative (unitary housing market) or segregative (dual housing market) direction— or neither direction. *But that’s not the full picture.* It’s still necessary to take into account household incomes and the cost of housing in each census tract and planning district.
- That’s where the “**Households Free Market**” row comes in. This row shows what the proportion of each group would be in a unitary free housing market given actual household incomes and the actual cost of housing, but absent the distortions housing discrimination introduces to the housing market. Be sure to compare the figures for 2013–2017 with 2000.
- The difference between the actual and expected proportions is shown in the “**Difference**” row. Comparing the 2000 and 2013–2017 data shows whether the census tract or neighborhood cluster has been moving in a pro-integrative or segregative direction since the turn of the century. As explained earlier, a difference

of more than ten percentage points suggests it is likely that housing discrimination has distorted the free housing market and a dual housing market may exist. These cells are highlighted in a cautionary yellow.

- But when the “**Households Difference**” for any group is 15 or more percentage points, it is very likely that the distortions discrimination introduces into the free housing market have created a dual housing market. These cells are highlighted in red. The larger the gap between actual and expected proportions of a group, the more *likely* it is that housing discrimination took place and/or is occurring in that neighborhood cluster or census tract.

It is vital to remember that in any city movement toward stable racially and ethnically integrated neighborhoods is an incremental process that will likely take decades to fully achieve — a success that requires the systematic, multi-pronged efforts recommended by this analysis of impediments. As noted earlier, households have many reasons to move to another home that have nothing directly to do with racial or ethnic composition of the new neighborhood. In addition, not that many households move each year. Consequently, *it is a positive sign when the gap between the actual proportion of a racial or ethnic group and the proportion expected in a unitary free market undistorted by housing discrimination shrinks by even five percentage points over a decade.*

Following the analysis of each neighborhood cluster is an analysis of the handful of census tracts that are not in any cluster, followed by observations and conclusions based on the data.

## Neighborhood Cluster 1

Table 11: Neighborhood Cluster 1 Free Market Analysis

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 1	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 1: Kalorama Heights, Adams Morgan, Lanier Heights</b>								
Actual proportions	71.8%	17.2%	4.5%	10.2%	83.4%	7.5%	4.0%	10.1%
Free market	65.8%	25.8%	4.2%	4.5%	60.3%	24.4%	8.9%	10.3%
Difference	5.9%	-8.7%	0.3%	5.7%	23.1%	-16.9%	-4.9%	-0.2%
<b>Census Tract 38.00</b>								
Actual proportions	51.3%	34.6%	2.6%	15.5%	69.4%	15.6%	4.5%	15.3%
Free market	62.2%	29.3%	4.1%	4.7%	58.8%	25.7%	8.8%	10.7%
Difference	-10.9%	5.4%	-1.5%	10.8%	10.6%	-10.1%	-4.3%	4.6%
<b>Census Tract 39.00</b>								
Actual proportions	65.0%	21.1%	5.3%	12.2%	86.9%	8.9%	2.3%	12.6%
Free market	63.4%	28.0%	4.1%	4.8%	59.0%	25.5%	8.8%	10.8%
Difference	1.5%	-6.9%	1.1%	7.4%	27.9%	-16.6%	-6.5%	1.8%
<b>Census Tract 40.01</b>								
Actual proportions	86.7%	5.5%	4.4%	6.8%	89.8%	1.7%	4.8%	6.2%
Free market	67.9%	23.8%	4.3%	4.3%	61.0%	23.8%	8.9%	10.0%
Difference	18.7%	-18.3%	0.1%	2.5%	28.8%	-22.2%	-4.1%	-3.7%
<b>Census Tract 40.02</b>								
Actual proportions	77.6%	12.7%	4.8%	7.3%	89.5%	4.4%	3.8%	6.6%
Free market	66.8%	24.8%	4.2%	4.5%	60.2%	24.4%	8.9%	10.5%
Difference	10.8%	-12.1%	0.5%	2.8%	29.3%	-20.0%	-5.1%	-3.9%
<b>Census Tract 41.00</b>								
Actual proportions	88.0%	4.4%	5.9%	6.7%	86.0%	2.5%	5.2%	5.7%
Free market	71.8%	20.4%	4.3%	3.9%	64.5%	20.7%	9.4%	8.9%
Difference	16.2%	-16.0%	1.6%	2.8%	21.6%	-18.2%	-4.2%	-3.2%
Sources: Data for 2000 are from the 2000 U.S. Census. Data for 2013–2017 are from the <i>American Community Survey, 2013–2017 5-Year Estimates</i> . Census tracts are those used in the 2000 Census with the tracts for 2013–2017 “crosswalked” back to the census tracts used in the 2000 Census.								

While Adams Morgan has been considered gentrified for some time, the data for Neighborhood Cluster 1 strongly suggests that gentrification does *not* account for the significant disparities in every Cluster 1 census tract. In 2000, the actual proportions of each of the four demographic groups in Neighborhood Cluster 1 as a whole were roughly what would be expected in a housing market without discrimination. By 2017, the actual proportion of white households was 23.1 percentage points greater than expected while the actual proportion of African American households was 16.9 percentage points lower. The actual proportion of Black households had fallen by nearly ten percentage points while the actual proportion of Caucasian households had risen by nearly 13 percentage points.

Census tracts 38.00 and 39.00 — tracts where it appears gentrification has occurred — appear to account for the lion's share of these changes. In 2000, the actual and expected proportions of white and African American households were generally pretty close. By 2017 that had changed dramatically. In tract 38.00 the actual proportion of Black households plummeted from 34.6 percent in 2000 to 15.6 percent in 2013–2017 even though the expected proportions declined by only 3.6 percentage points. In tract 39.00, the actual proportion of white households soared by nearly 22 percentage points and the actual proportion of Black households fell by nearly 12 percentage points, resulting in the actual proportion of white households exceeding the expected proportion by almost 28 percentage points and the actual proportion of African American households plummeting to 8.9 percent, almost 17 percentage points lower than expected in a discrimination-free housing market.

A significantly greater proportion of Black households can afford to live throughout Neighborhood Cluster 1 than actually do. That suggests that expanding gentrification may not account for the decline in the Black population in Cluster 1. The data suggest that housing discrimination may be playing a greater role than gentrification in Neighborhood Cluster 1. It *appears* that something is happening to drive out African American households that can afford to live in even the gentrifying portions of Cluster 1.

In 2000, the other three tracts all exhibited disparities between actual and expected proportions of Caucasian and African American households. Those disparities had widened by 2013–2017. With the exception of Hispanics in tract 28.00 in 2000, the proportions of Asian households and Hispanic households of any race have been roughly what would be expected in a housing market devoid of housing discrimination.

The data suggest that the cost of housing does not explain these disparities for Black and Caucasian households. It is very possible that discriminatory lending and real estate practices against African Americans account for these differences — fostering a dual housing market.

Neighborhood Cluster 2

**Table 12: Neighborhood Cluster 2 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 2	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 2: Columbia Heights, Mt. Pleasant, Pleasant Plains, Park View</b>								
Actual proportions	23.8%	54.6%	2.4%	22.5%	51.3%	30.7%	4.2%	18.6%
Free market	59.3%	32.1%	4.2%	4.7%	56.3%	28.0%	8.6%	11.1%
Difference	-35.5%	22.5%	-1.8%	17.8%	-5.0%	2.6%	-4.4%	7.5%
<b>Census Tract 27.01</b>								
Actual proportions	44.2%	29.0%	5.0%	18.9%	65.0%	15.3%	3.5%	3.5%
Free market	62.0%	29.4%	4.2%	4.7%	56.1%	28.2%	8.5%	11.5%
Difference	-17.8%	-0.5%	0.8%	14.2%	8.9%	-12.9%	-5.0%	-7.9%
<b>Census Tract 27.02</b>								
Actual proportions	55.8%	25.4%	4.5%	22.8%	69.0%	20.3%	1.7%	17.7%
Free market	63.9%	27.7%	4.2%	4.5%	57.5%	27.1%	8.6%	10.8%
Difference	-8.0%	-2.3%	0.2%	18.3%	11.6%	-6.8%	-6.9%	6.9%
<b>Census Tract 28.01</b>								
Actual proportions	12.8%	59.1%	1.8%	28.2%	35.6%	42.9%	3.5%	24.3%
Free market	56.3%	34.9%	4.2%	4.8%	52.7%	31.2%	8.1%	12.8%
Difference	-43.5%	24.3%	-2.4%	23.5%	-17.1%	11.7%	-4.6%	11.5%
<b>Census Tract 28.02</b>								
Actual proportions	20.4%	43.7%	3.2%	41.6%	38.8%	28.6%	10.6%	32.1%
Free market	56.9%	34.3%	4.1%	4.8%	53.3%	30.6%	8.5%	12.0%
Difference	-36.5%	9.3%	-0.9%	36.8%	-14.5%	-2.0%	2.1%	20.1%
<b>Census Tract 29.00</b>								
Actual proportions	9.8%	62.9%	0.6%	29.4%	56.0%	22.9%	2.2%	22.8%
Free market	60.3%	31.1%	4.2%	4.6%	60.3%	24.4%	8.9%	10.4%
Difference	-50.6%	31.7%	-3.5%	24.7%	-4.3%	-1.4%	-6.7%	12.4%
<b>Census Tract 30.00</b>								
Actual proportions	13.6%	69.1%	0.9%	20.4%	45.4%	44.8%	2.0%	14.3%
Free market	57.1%	34.1%	4.2%	4.7%	55.0%	29.5%	8.6%	10.7%
Difference	-43.6%	35.1%	-3.3%	15.8%	-9.5%	15.3%	-6.6%	3.6%
<b>Census Tract 31.00</b>								
Actual proportions	8.7%	77.8%	0.0%	16.5%	43.9%	29.1%	4.3%	24.8%
Free market	60.8%	30.6%	4.1%	4.8%	59.1%	25.5%	8.8%	10.7%
Difference	-52.1%	47.2%	-4.1%	11.8%	-15.2%	3.6%	-4.5%	14.1%

## District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017

Neighborhood Cluster 2	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Census Tract 32.00</b>								
Actual proportions	4.3%	84.3%	0.0%	9.2%	38.2%	39.4%	4.5%	24.2%
Free market	59.4%	31.9%	4.2%	4.8%	57.3%	27.0%	8.8%	11.0%
Difference	-55.1%	52.5%	-4.2%	4.4%	-19.1%	12.3%	-4.2%	13.3%
<b>Census Tract 35.00</b>								
Actual proportions	4.8%	85.1%	1.0%	10.6%	35.1%	48.5%	7.5%	7.8%
Free market	54.4%	36.6%	4.3%	4.7%	55.3%	29.2%	8.6%	10.6%
Difference	-49.6%	48.5%	-3.3%	5.9%	-20.3%	19.3%	-1.1%	-2.8%
<b>Census Tract 36.00</b>								
Actual proportions	12.4%	71.3%	2.1%	14.1%	58.7%	30.7%	3.7%	17.2%
Free market	56.5%	34.7%	4.2%	4.7%	58.1%	26.5%	8.8%	10.4%
Difference	-44.2%	36.6%	-2.1%	9.4%	0.7%	4.1%	-5.1%	6.8%
<b>Census Tract 37.00</b>								
Actual proportions	20.5%	59.4%	1.5%	28.0%	53.9%	34.4%	3.7%	19.9%
Free market	57.3%	34.0%	4.1%	4.9%	55.6%	28.7%	8.6%	11.1%
Difference	-36.7%	25.4%	-2.6%	23.2%	-1.6%	5.7%	-5.0%	8.7%

Neighborhood Cluster 2 has been undergoing demographic change, possibly due to gentrification in the Mount Pleasant and Columbia Heights neighborhoods. These trends have resulted in a neighborhood cluster where the actual proportions of all four demographic groups are roughly what would be expected in a housing market absent discrimination. While there hasn't been much change over time in the expected proportions of each racial/ethnic group, the actual proportion of white households has more than doubled while the actual proportion of African American households has declined from 54.6 percent in 2000 to 30.7 percent in 2013–2017. With the expected proportion of Hispanic households more than doubling from 4.7 percent in 2000 to 11.1 percent in 2013–2017, the actual proportion of Hispanic households is closer to what would be expected even though it declined slightly. The actual and expected proportions of Asian households have doubled since 2000, with the actual proportions half of the expected shares.

The actual proportion of white households has increase over time from as few as 13.2 percentage points in tract 27.02 to as much as 46.2 and 46.3 percentage points in tracts 29.00 and 36.00 respectively — bringing the actual proportions closer to expected shares. The data suggest that the proportions of white households throughout Neighborhood Cluster 2 are now much closer to what would be expected in a housing market absent discrimination than was the case in 2000. The number of census tracts in Cluster 2 where the actual proportion of Black households was more than 15 percentage points higher than expected fell from eight tracks in 2000 to four in 2013–2017.

Now that the actual and expected proportions of each demographic group are much closer than in 2000 and the cluster's demographics suggest a unitary housing market, the challenge the District faces is to preserve the more racially integrated nature of Neighborhood Cluster 2 and its unitary housing market.

Neighborhood Cluster 3

**Table 13: Neighborhood Cluster 3 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 3	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 3: Howard University, Le Droit Park, Cardozo/Shaw</b>								
Actual proportions	31.3%	57.3%	1.5%	9.0%	63.9%	24.2%	5.6%	8.5%
Free market	60.1%	31.2%	4.2%	4.6%	60.6%	24.3%	9.1%	9.5%
Difference	-28.8%	26.1%	-2.8%	4.4%	3.4%	-0.1%	-3.5%	-1.0%
<b>Census Tract 34.00</b>								
Actual proportions	2.4%	90.1%	1.4%	2.1%	35.1%	51.3%	6.5%	9.9%
Free market	55.5%	35.6%	4.3%	4.6%	55.5%	29.0%	8.8%	10.4%
Difference	-53.2%	54.4%	-2.8%	-2.6%	-20.5%	22.3%	-2.2%	-0.5%
<b>Census Tract 43.00</b>								
Actual proportions	45.6%	39.7%	2.0%	10.1%	66.3%	21.4%	5.0%	9.8%
Free market	61.7%	29.8%	4.2%	4.6%	58.1%	26.4%	8.8%	10.6%
Difference	-16.0%	9.9%	-2.2%	5.5%	8.2%	-5.0%	-3.7%	-0.9%
<b>Census Tract 44.00</b>								
Actual proportions	35.3%	55.2%	0.6%	13.9%	73.3%	15.8%	5.7%	7.0%
Free market	62.0%	29.4%	4.3%	4.6%	64.5%	20.8%	9.6%	8.4%
Difference	-26.7%	25.8%	-3.6%	9.4%	8.9%	-5.0%	-3.9%	-1.4%

Sitting south and east of Cluster 2, Neighborhood Cluster 3 as a whole has largely eliminated the massive differences between actual and expected proportions of white and African American households. The only tract where the differences in proportions remain large is the formerly hyper-segregated tract 34.00.

Gentrification, especially in the Shaw neighborhood, has likely contributed to this correction to a housing market likely distorted by discrimination. Gentrification is a likely contributory cause as reflected by the expected free market proportions of Black households declining by nearly nine percentage points in tract 44.00 and 6.6 percentage points in tract 34.00.

Cluster 3 is home to Howard University which has a predominantly African American student body — which certainly influences the household composition in the surrounding neighborhoods. The actual proportions of Asian households have remained at levels consistent with what would be expected. The actual proportions of Hispanic households of any race have gotten closer to the levels expected in a housing market absent discrimination.

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Neighborhood Cluster 4

**Table 14: Neighborhood Cluster 4 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 4	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 4: Georgetown, Burleith/Hillandale</b>								
Actual proportions	91.3%	2.2%	3.5%	3.9%	90.4%	3.1%	5.2%	6.8%
Free market	71.2%	21.6%	4.4%	3.9%	63.5%	21.7%	9.4%	8.7%
Difference	20.1%	-19.3%	-0.9%	0.0%	26.9%	-18.6%	-4.2%	-1.9%
<b>Census Tract 1.0</b>								
Actual proportions	93.1%	1.9%	2.7%	4.2%	93.0%	1.5%	4.8%	7.6%
Free market	72.1%	20.0%	4.4%	3.8%	65.0%	20.3%	9.5%	8.3%
Difference	21.0%	-18.2%	-1.7%	0.4%	28.0%	-18.8%	-4.7%	-0.6%
<b>Census Tract 2.01</b>								
Actual proportions	58 Households				No Households			
Free market								
Difference								
<b>Census Tract 2.02</b>								
Actual proportions	94.2%	1.6%	3.1%	2.2%	92.5%	2.5%	3.3%	6.4%
Free market	69.9%	22.2%	4.4%	3.7%	63.0%	22.0%	9.5%	8.9%
Difference	24.3%	-20.6%	-1.3%	-1.5%	29.5%	-19.5%	-6.2%	-2.5%
<b>Census Tract 3.00</b>								
Actual proportions	87.6%	3.0%	4.6%	4.8%	86.4%	5.0%	6.9%	6.2%
Free market	69.6%	22.3%	4.4%	4.1%	62.2%	22.8%	9.3%	9.0%
Difference	18.0%	-19.3%	0.2%	0.7%	24.2%	-17.8%	-2.4%	-2.8%

Neighborhood Cluster 4 continues to exhibit the characteristics of a dual housing market with extensive housing discrimination. The difference between the actual proportion of African American households and the expected proportions continues to hover around 19 percent. While just 3.1 percent of Cluster 4 households were Black in 2013–2017, 21.7 percent would have been African American in a discrimination-free housing market. Meanwhile the actual proportion of white households barely budged since 2000 while the expected proportion fell by nearly eight percentage points and the gap between actual and expected proportions grew from 20.1 percent to 26.9 percent in 2013–2017.

While the numbers are small, the difference between the actual and expected proportions of Asian households got worse since 2000, although still within parameters. The same phenomenon, albeit not as badly, held true for Hispanic households of any race.

It appears that even the wealthier African American households that can afford to live in Georgetown and Burleith/Hillandale are facing discriminatory lending and/or real estate practices and are facing a dual housing market from which they are largely excluded.

Neighborhood Cluster 5

**Table 15: Neighborhood Cluster 5 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 5	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 5: West End, Foggy Bottom, GWU</b>								
Actual proportions	77.4%	4.5%	11.8%	5.5%	69.5%	7.2%	13.9%	14.3%
Free market	60.3%	31.2%	4.4%	4.4%	54.3%	30.2%	8.7%	10.7%
Difference	17.1%	-26.7%	7.4%	1.1%	15.2%	-23.0%	5.3%	3.6%
<b>Census Tract 55 – Block Group 3</b>								
Actual proportions	82.6%	5.4%	8.0%	4.9%	Data not available for block groups			
Free market	66.6%	25.1%	4.4%	4.3%				
Difference	16.0%	-19.7%	3.6%	0.6%				
<b>Census Tract 56.00</b>								
Actual proportions	80.6%	4.3%	8.4%	5.9%	71.7%	6.6%	11.5%	14.6%
Free market	61.6%	29.9%	4.3%	4.4%	55.6%	29.0%	8.7%	10.5%
Difference	19.0%	-25.6%	4.1%	1.6%	16.1%	-22.3%	2.8%	4.2%
<b>Census Tract 57.01</b>								
Actual proportions	64.0%	4.2%	24.6%	4.9%	61.8%	9.1%	22.2%	13.0%
Free market	50.9%	40.0%	4.4%	4.6%	49.7%	34.5%	8.5%	11.4%
Difference	13.1%	-35.8%	20.2%	0.4%	12.1%	-25.4%	13.7%	1.6%

Little has changed in Neighborhood Cluster 5 since 2000. Household income still does not explain the very substantial differences in 2000 and 2013–2017 between the actual proportions of African American households in Cluster 5 and the higher proportions that would have existed in a housing market without racial discrimination. While just over 30 percent of the households in Cluster 5 would be expected to be African American in a free housing market devoid of discrimination, just 4.5 percent were in 2000 and only 7.2 percent were in 2013–2017. The cluster certainly exhibits the characteristics of a dual housing market from which African Americans are excluded.

Since 2000, the actual proportion of Asian households has significantly exceeded the proportion expected. However, the difference between the actual proportion and expected proportion has declined from 20.2 percent in 2000 to 13.7 percent in 2013–2017.

While it is *possible* that the presence of George Washington University explains much of the demographics in Cluster 5, it is also likely that housing discrimination against African Americans plays a role.

Neighborhood Cluster 6

**Table 16: Neighborhood Cluster 6 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 6	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 6: Dupont Circle, Connecticut Avenue/K Street</b>								
Actual proportions	78.5%	7.5%	6.8%	7.3%	80.3%	5.6%	8.7%	9.8%
Free market	66.1%	26.6%	4.3%	4.5%	58.6%	25.8%	8.8%	10.8%
Difference	12.4%	-19.1%	2.6%	2.7%	21.7%	-20.2%	-0.1%	-1.0%
<b>Census Tract 42.01</b>								
Actual proportions	76.7%	11.5%	3.6%	8.1%	78.5%	10.8%	4.4%	4.4%
Free market	65.9%	25.8%	4.2%	4.5%	61.9%	22.9%	9.0%	10.0%
Difference	10.7%	-14.3%	-0.6%	3.6%	16.5%	-12.1%	-4.6%	-5.6%
<b>Census Tract 42.02</b>								
Actual proportions	80.3%	7.0%	6.8%	7.2%	87.3%	0.5%	4.6%	12.9%
Free market	65.9%	25.8%	4.2%	4.5%	59.6%	24.9%	8.9%	10.6%
Difference	14.5%	-18.8%	2.5%	2.7%	27.6%	-24.4%	-4.3%	2.3%
<b>Census Tract 52.02</b>								
Actual proportions	40.5%	28.3%	15.4%	13.7%	71.7%	10.7%	11.1%	12.2%
Free market	57.3%	34.0%	4.1%	4.9%	56.6%	28.0%	8.6%	11.0%
Difference	-16.8%	-5.7%	11.3%	8.8%	15.1%	-17.3%	2.5%	1.1%
<b>Census Tract 53.01</b>								
Actual proportions	80.8%	5.0%	6.1%	7.2%	79.9%	3.6%	12.9%	9.3%
Free market	65.5%	26.1%	4.2%	4.5%	57.7%	26.6%	8.8%	11.0%
Difference	15.2%	-21.1%	1.8%	2.7%	22.2%	-22.9%	4.1%	-1.7%
<b>Census Tract 53.02</b>								
Actual proportions	136 Households				99 Households			
Free market	Number of households too small to make reliable estimates				Number of households too small to make reliable estimates			
Difference								
<b>Census Tract 54.01</b>								
Actual proportions	77.3%	4.9%	12.7%	5.3%	78.2%	7.4%	9.1%	16.4%
Free market	62.7%	28.9%	4.2%	4.5%	54.2%	29.8%	8.4%	12.0%
Difference	14.6%	-23.9%	8.5%	0.8%	24.1%	-22.4%	0.7%	4.5%
<b>Census Tract 54.02</b>								
Actual proportions	Zero households in 2000				54 Households			
Free market					Number of households too small to make reliable estimates			
Difference								
<b>Census Tract 55 – Block Group 1</b>								
Actual proportions	78.2%	7.4%	14.5%	2.5%	No data			
Free market	65.9%	25.8%	4.2%	4.4%				
Difference	12.2%	-18.4%	10.2%	-2.0%				
<b>Census Tract 55 – Block Group 2</b>								
Actual proportions	86.1%	4.1%	3.7%	7.6%	No data			
Free market	67.2%	24.6%	4.3%	4.3%				
Difference	19.0%	-20.5%	-0.6%	3.3%				

While Dupont Circle has gentrified, the data for Neighborhood Cluster 6 strongly suggests that gentrification does *not* account for the lower than expected proportions of African American households. The actual proportions of African American households are lower than expected throughout Neighborhood Cluster 6

The actual proportions of Hispanic households of any race are what would be expected in a discrimination-free housing market. The situation is pretty much the same for Asian households. In 2000, it appeared that a concentration was developing in tract 52.02 where the actual proportion of Asian households was more than 11 percentage points greater than expected. However, by 2017 the proportion of Asian households was well within the range expected in a housing market free of discrimination.

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Neighborhood Cluster 7

**Table 17: Neighborhood Cluster 7 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 7	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 7: Shaw, Logan Circle</b>								
Actual proportions	37.7%	48.6%	4.9%	11.7%	58.5%	23.4%	7.6%	13.0%
Free market	59.4%	32.0%	4.2%	4.6%	58.6%	26.0%	8.9%	10.3%
Difference	-21.7%	16.6%	0.7%	7.0%	-0.1%	-2.6%	-1.3%	2.8%
<b>Census Tract 48.01</b>								
Actual proportions	7.0%	80.3%	4.5%	8.0%	44.4%	33.7%	10.1%	8.5%
Free market	56.4%	34.8%	4.2%	4.7%	59.4%	25.3%	9.1%	9.9%
Difference	-49.5%	45.5%	0.3%	3.3%	-15.0%	8.4%	1.1%	-1.4%
<b>Census Tract 48.02</b>								
Actual proportions	9.6%	76.8%	8.1%	5.2%	44.9%	44.1%	6.1%	5.1%
Free market	57.9%	33.4%	4.2%	4.8%	56.0%	28.3%	8.5%	11.4%
Difference	-48.3%	43.4%	3.9%	0.5%	-11.1%	15.7%	-2.4%	-6.3%
<b>Census Tract 49.01</b>								
Actual proportions	14.8%	77.6%	2.0%	2.8%	51.2%	38.1%	6.4%	12.6%
Free market	56.6%	34.7%	4.3%	4.5%	58.3%	26.3%	8.9%	10.3%
Difference	-41.8%	42.9%	-2.3%	-1.6%	-7.1%	11.8%	-2.5%	2.4%
<b>Census Tract 49.02</b>								
Actual proportions	24.4%	65.3%	2.2%	20.2%	55.5%	21.7%	10.4%	17.0%
Free market	59.4%	31.9%	4.1%	4.9%	56.9%	27.8%	8.8%	10.1%
Difference	-35.0%	33.3%	-2.0%	15.4%	-1.3%	-6.1%	1.6%	6.9%
<b>Census Tract 50.00</b>								
Actual proportions	41.4%	40.9%	4.9%	17.9%	60.1%	22.6%	7.4%	14.7%
Free market	60.0%	31.4%	4.3%	4.5%	58.6%	26.1%	8.9%	10.1%
Difference	-18.6%	9.5%	0.6%	13.3%	1.5%	-3.5%	-1.6%	4.5%
<b>Census Tract 52.01</b>								
Actual proportions	63.5%	24.2%	5.5%	7.7%	70.2%	8.1%	7.3%	14.8%
Free market	60.9%	30.5%	4.2%	4.7%	60.3%	24.4%	9.0%	10.0%
Difference	2.6%	-6.3%	1.4%	3.0%	9.9%	-16.3%	-1.7%	4.7%

The gentrification of Neighborhood Cluster 7 reported in the 2006–2010 analysis of impediments continues unabated. Already in census tract 52.01, the actual proportion of Black households is 16.3 percentage points lower than would be expected. While the demographic data reflect what appears to be a unitary housing market, it is likely that gentrification may be making the continuing existence of a dual housing market.

Neighborhood Cluster 8

**Table 18: Neighborhood Cluster 8 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 8	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 8: Downtown, Chinatown, Penn Quarters, Mount Vernon Square, North Capitol Street</b>								
Actual proportions	25.5%	61.7%	9.8%	3.5%	55.5%	26.1%	12.7%	8.0%
Free market	56.9%	34.4%	4.2%	4.6%	56.6%	27.9%	8.8%	10.4%
Difference	-31.4%	27.2%	5.5%	-1.1%	-1.2%	-1.8%	3.9%	-2.4%
<b>Census Tract 47.00</b>								
Actual proportions	2.6%	91.4%	3.3%	1.4%	40.0%	42.9%	11.4%	5.9%
Free market	52.7%	38.4%	4.2%	4.7%	54.4%	30.0%	8.6%	10.9%
Difference	-50.1%	53.0%	-0.9%	-3.2%	-14.4%	12.9%	2.8%	-5.1%
<b>Census Tract 51.00</b>								
Actual proportions	65.7%	23.8%	2.1%	10.4%	71.6%	10.6%	11.0%	12.3%
Free market	62.8%	28.6%	4.1%	4.9%	56.5%	27.8%	8.6%	11.0%
Difference	2.9%	-4.9%	-2.0%	5.5%	15.2%	-17.2%	2.4%	1.2%
<b>Census Tract 58.00</b>								
Actual proportions	53.7%	12.3%	33.1%	2.9%	74.5%	3.6%	16.5%	10.0%
Free market	62.2%	29.4%	4.3%	4.2%	61.4%	23.6%	9.2%	9.2%
Difference	-8.6%	-17.1%	28.8%	-1.2%	13.0%	-19.9%	7.3%	0.9%
<b>Census Tract 59.00</b>								
Actual proportions	14.6%	79.5%	3.4%	3.5%	59.7%	21.9%	12.8%	7.1%
Free market	55.6%	35.5%	4.2%	4.7%	57.0%	27.6%	9.0%	9.9%
Difference	-41.0%	44.0%	-0.9%	-1.2%	2.7%	-5.7%	3.8%	-2.7%

There have been dramatic reductions for Neighborhood Cluster 8 in the differences between actual and expected proportions. The actual proportion of White households has more than doubled to 55.5 percent, while the actual proportion of Black households declined from 67.1 percent to 26.1 percent.

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Neighborhood Cluster 9

**Table 19: Neighborhood Cluster 9 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 9	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 9: Southwest Employment Area, Southwest/Waterfront, Fort McNair, Buzzard Point</b>								
Actual proportions	30.4%	62.8%	2.1%	3.3%	50.2%	41.8%	3.5%	4.8%
Free market	61.7%	31.2%	4.3%	4.8%	55.0%	29.2%	8.6%	11.3%
Difference	-31.3%	31.7%	-2.1%	-1.6%	-4.9%	12.7%	-5.2%	-6.5%
<b>Census Tract 60.01</b>								
Actual proportions	32.2%	56.3%	2.5%	4.8%	50.9%	38.5%	3.0%	6.5%
Free market	61.4%	29.9%	4.1%	4.9%	55.8%	28.4%	8.8%	10.8%
Difference	-29.2%	26.3%	-1.6%	-0.1%	-5.0%	10.2%	-5.9%	-4.4%
<b>Census Tract 60.02</b>								
Actual proportions	4.7%	95.3%	0.0%	0.0%	50.8%	38.6%	3.0%	6.4%
Free market	52.9%	38.3%	4.1%	4.7%	56.0%	28.4%	8.9%	10.8%
Difference	-48.2%	57.0%	-4.1%	-4.7%	-5.2%	10.2%	-5.9%	-4.4%
<b>Census Tract 61.00</b>								
Actual proportions	32.6%	61.1%	2.4%	3.3%	51.3%	39.4%	4.9%	3.1%
Free market	63.1%	28.4%	4.2%	4.8%	59.8%	24.8%	8.9%	10.6%
Difference	-30.4%	32.7%	-1.7%	-1.5%	-8.5%	14.6%	-4.0%	-7.5%
<b>Census Tract 62.01</b>								
Actual proportions	92 Households				51.4%	39.2%	4.7%	3.3%
Free market	Number of households too small to make				59.2%	24.4%	8.9%	10.4%
Difference	reliable estimates				-7.8%	14.7%	-4.1%	-7.1%
<b>Census Tract 63.01</b>								
Actual proportions	41.0%	52.9%	2.6%	3.1%	64.5%	27.3%	4.7%	2.5%
Free market	62.7%	28.8%	4.2%	4.6%	55.6%	28.5%	8.4%	11.9%
Difference	-21.7%	24.1%	-1.6%	-1.6%	8.9%	-1.3%	-3.7%	-9.4%
<b>Census Tract 63.02</b>								
Actual proportions	22 Households				9 Households			
Free market	Number of households too small to make				Number of households too small to make			
Difference	reliable estimates				reliable estimates			
<b>Census Tract 64.00</b>								
Actual proportions	4.1%	93.8%	0.3%	1.7%	18.5%	80.5%	0.2%	8.3%
Free market	52.1%	38.9%	4.3%	4.7%	46.8%	37.2%	8.3%	11.6%
Difference	-48.0%	54.9%	-4.0%	-3.0%	-28.3%	43.4%	-8.1%	-3.3%

Neighborhood Cluster 9 is also experiencing an influx of Caucasian households and large declines in the Black population in most census tracts (60.01, 60.02, 61.00, 63.01). This has narrowed the difference between actual and expected proportions of both White and Black households. The cluster has gone from more than 62 percent Black to more than 50 percent white.

Throughout Cluster 9, the actual proportions of Asian and Hispanic households continue to be close to expected proportions.

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Neighborhood Cluster 10

**Table 20: Neighborhood Cluster 10 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 10	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 10: Hawthorne, Barnaby Woods, Chevy Chase</b>								
Actual proportions	79.2%	11.7%	4.3%	5.5%	81.8%	9.3%	4.4%	7.9%
Free market	72.2%	20.0%	4.4%	3.7%	63.4%	21.6%	9.4%	9.1%
Difference	7.1%	-8.4%	-0.1%	1.8%	18.4%	-12.2%	-5.0%	-1.1%
<b>Census Tract 14.01</b>								
Actual proportions	82.9%	6.0%	6.4%	6.5%	77.8%	11.2%	6.8%	6.5%
Free market	71.1%	21.1%	4.4%	3.9%	61.9%	22.9%	9.2%	9.6%
Difference	11.8%	-15.1%	2.0%	2.6%	15.8%	-11.7%	-2.4%	-3.1%
<b>Census Tract 14.02</b>								
Actual proportions	66.2%	20.5%	5.8%	9.7%	77.4%	10.6%	5.2%	11.1%
Free market	68.6%	23.4%	4.5%	3.8%	60.8%	24.0%	9.1%	9.8%
Difference	-2.5%	-2.8%	1.3%	5.9%	16.6%	-13.4%	-3.9%	1.3%
<b>Census Tract 15.00</b>								
Actual proportions	84.1%	10.5%	2.2%	2.5%	87.8%	7.2%	2.1%	6.6%
Free market	74.9%	17.5%	4.5%	3.6%	66.4%	18.9%	9.7%	8.2%
Difference	9.2%	-7.0%	-2.3%	-1.0%	21.4%	-11.8%	-7.6%	-1.6%

Significantly fewer African Americans households live in Neighborhood Cluster 10 than expected. The gap between actual and expected proportions of Black households in Cluster 10 has increased since 2000. The actual proportions of white households have become greater than the proportions expected in a discrimination-free housing market. The high cost of housing may not alone explain the dearth of African American residents nor the actual proportion of Black households in tract 14.02 falling in half since the turn of the century. The actual proportions of Asian households and of Hispanic households of any race continue to be what would be expected absent discrimination.

Neighborhood Cluster 11

**Table 21: Neighborhood Cluster 11 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 11	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 11: Friendship Heights, American University Park, Tenleytown</b>								
Actual proportions	90.8%	4.7%	3.0%	2.5%	85.5%	5.8%	6.8%	7.3%
Free market	73.6%	18.6%	4.5%	3.7%	64.2%	20.9%	9.4%	8.8%
Difference	17.1%	-13.9%	-1.4%	-1.2%	21.3%	-15.1%	-2.6%	-1.6%
<b>Census Tract 10.01</b>								
Actual proportions	92.8%	4.1%	2.0%	2.3%	86.6%	3.2%	7.2%	7.2%
Free market	73.9%	18.4%	4.5%	3.6%	64.7%	20.5%	9.4%	8.8%
Difference	18.9%	-14.3%	-2.5%	-1.3%	21.9%	-17.3%	-2.3%	-1.6%
<b>Census Tract 11.00</b>								
Actual proportions	88.0%	5.5%	4.5%	2.7%	83.9%	9.4%	6.4%	7.4%
Free market	73.3%	18.9%	4.5%	3.7%	63.6%	21.5%	9.4%	8.9%
Difference	14.7%	-13.4%	0.0%	-1.0%	20.3%	-12.1%	-3.0%	-1.6%

The demographics of Neighborhood Cluster 11 have changed little since 2000. The proportion of Whites continues to be higher than expected while the proportion of African Americans continues to be lower. The proportions of Asian and Hispanic households, however, increased modestly.

The data suggest that the cost of housing does not explain these disparities. It is very possible that a dual housing market with continuing discriminatory practices against African Americans account for these differences.

Neighborhood Cluster 12

**Table 22: Neighborhood Cluster 12 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 12	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 12: North Cleveland Park, Forest Hills, Van Ness</b>								
Actual proportions	85.7%	6.1%	5.4%	4.9%	79.8%	8.5%	6.6%	9.1%
Free market	68.4%	23.4%	4.3%	4.2%	60.9%	23.8%	9.1%	9.9%
Difference	17.2%	-17.4%	1.1%	0.6%	18.9%	-15.4%	-2.5%	-0.8%
<b>Census Tract 12</b>								
Actual proportions	85.4%	6.1%	5.7%	5.5%	83.0%	6.8%	6.6%	6.5%
Free market	70.3%	21.8%	4.3%	4.0%	61.7%	23.2%	9.0%	9.7%
Difference	15.2%	-15.7%	1.4%	1.5%	21.3%	-16.4%	-2.4%	-3.3%
<b>Census Tract 13.01</b>								
Actual proportions	83.9%	7.9%	5.7%	4.8%	81.6%	10.0%	6.9%	7.9%
Free market	69.4%	22.6%	4.3%	4.1%	62.8%	22.2%	9.2%	9.5%
Difference	14.5%	-14.7%	1.4%	0.8%	18.8%	-12.2%	-2.2%	-1.6%
<b>Census Tract 13.02</b>								
Actual proportions	86.7%	5.2%	5.1%	4.6%	77.3%	8.7%	6.4%	11.1%
Free market	67.0%	24.7%	4.2%	4.4%	59.8%	24.9%	9.0%	10.1%
Difference	19.6%	-19.5%	0.8%	0.1%	17.6%	-16.2%	-2.6%	1.0%

Neighborhood Cluster 12 has shown little change from the higher than expected proportions of white households and lower than expected proportions of African American households since the turn of the century. The actual proportions of Black households is one-half to one-third of the expected proportions. In contrast, the actual proportions of Asian and Hispanic households are roughly what would be expected in a discrimination-free housing market.

The data suggest that the cost of housing does not explain these disparities and that Cluster 12 is part of the dual housing market with continuing discriminatory practices against African Americans.

Neighborhood Cluster 13

**Table 23: Neighborhood Cluster 13 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 13	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 13: Spring Valley, Palisades, Wesley Heights, Foxhall Crescent, Foxhall Village, Georgetown Reservoir</b>								
Actual proportions	91.1%	2.9%	2.9%	6.0%	85.4%	4.0%	5.4%	9.4%
Free market	72.9%	19.4%	4.4%	3.7%	63.7%	21.4%	9.4%	8.8%
Difference	18.2%	-16.5%	-1.5%	2.3%	21.6%	-17.4%	-3.9%	0.7%
<b>Census Tract 8.01</b>								
Actual proportions	90.6%	3.2%	2.9%	7.1%	82.1%	4.0%	5.6%	10.9%
Free market	71.2%	20.9%	4.4%	3.8%	62.5%	22.5%	9.2%	9.1%
Difference	19.3%	-17.7%	-1.4%	3.2%	19.6%	-18.5%	-3.6%	1.8%
<b>Census Tract 8.02</b>								
Actual proportions	88.8%	2.6%	5.5%	4.7%	75.7%	7.4%	11.1%	13.8%
Free market	70.0%	22.0%	4.4%	3.9%	59.9%	24.9%	9.1%	9.7%
Difference	18.8%	-19.4%	1.2%	0.8%	15.8%	-17.5%	2.0%	4.1%
<b>Census Tract 9.01</b>								
Actual proportions	93.4%	2.6%	1.3%	5.5%	93.8%	2.6%	2.6%	5.2%
Free market	77.7%	15.0%	4.5%	3.2%	67.3%	18.2%	9.7%	7.8%
Difference	15.7%	-12.4%	-3.1%	2.3%	26.5%	-15.6%	-7.1%	-2.6%
<b>Census Tract 9.02</b>								
Actual proportions	92.5%	2.3%	1.5%	4.4%	94.7%	1.7%	1.4%	6.0%
Free market	75.5%	16.9%	4.4%	3.5%	66.8%	18.6%	9.7%	8.0%
Difference	17.0%	-14.6%	-2.9%	0.9%	27.8%	-16.9%	-8.3%	-2.0%

Neighborhood Cluster 13 shows little demographic change since the turn of the century. The actual proportions of African American households living in Neighborhood Cluster 13 continue to be a small fraction of what would be expected in a housing market absent discrimination. Meanwhile the actual proportions of Asian households and Hispanic households of any race are pretty much what would be expected in a discrimination-free housing market.

The high cost of housing alone may not explain these disparities — the actual proportion of Black households in Cluster 13 is 17.4 percentage points lower than what would be expected absent discrimination.

Neighborhood Cluster 14

**Table 24: Neighborhood Cluster 14 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 14	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 14: Cathedral Heights, McLean Gardens, Glover Park</b>								
Actual proportions	82.1%	5.5%	5.2%	9.5%	78.7%	6.7%	7.9%	9.2%
Free market	63.9%	27.6%	4.2%	4.5%	56.7%	27.7%	8.6%	11.1%
Difference	18.2%	-22.1%	0.9%	4.9%	22.0%	-21.0%	-0.7%	-2.0%
<b>Census Tract 7.01</b>								
Actual proportions	87.1%	4.2%	3.9%	8.3%	77.1%	8.5%	5.8%	5.2%
Free market	66.3%	25.4%	4.2%	4.5%	57.6%	26.7%	8.7%	11.0%
Difference	20.9%	-21.2%	-0.4%	3.9%	19.5%	-18.2%	-3.0%	-5.8%
<b>Census Tract 7.02</b>								
Actual proportions	79.4%	7.0%	4.2%	10.8%	77.1%	6.6%	10.0%	15.8%
Free market	61.5%	29.9%	4.2%	4.8%	55.1%	29.0%	8.2%	12.2%
Difference	17.9%	-22.9%	0.1%	6.0%	22.0%	-22.5%	1.8%	3.6%
<b>Census Tract 10.02</b>								
Actual proportions	78.4%	5.5%	7.7%	9.7%	83.3%	3.5%	9.5%	8.6%
Free market	63.4%	28.2%	4.3%	4.4%	56.8%	27.7%	8.9%	10.2%
Difference	15.0%	-22.7%	3.5%	5.2%	26.5%	-24.3%	0.6%	-1.6%

Neighborhood Cluster 14 exhibits similar demographic characteristics to Clusters 10 through 13. There has been virtually no change since the year 2000.

As in these other clusters, the high cost of housing alone may not explain these disparities — the actual proportion of Black households in Cluster 14 is 21 percentage points lower than what would be expected absent discrimination.

Neighborhood Cluster 15

**Table 25: Neighborhood Cluster 15 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 15	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 15: Cleveland Park, Woodley Park, Massachusetts Avenue Heights, Woodland-Normanstone Terrace								
Actual proportions	87.0%	4.0%	4.5%	6.7%	85.6%	5.7%	4.7%	11.6%
Free market	70.7%	21.4%	4.3%	4.0%	63.3%	21.8%	9.4%	8.9%
Difference	16.4%	-17.4%	0.1%	2.7%	22.3%	-16.1%	-4.6%	2.7%
Census Tract 4.0								
Actual proportions	87.2%	4.8%	4.5%	0.9%	83.5%	3.1%	5.5%	17.4%
Free market	75.7%	16.8%	4.4%	3.5%	62.1%	22.8%	9.2%	9.5%
Difference	11.4%	-12.0%	0.1%	-2.6%	21.4%	-19.7%	-3.8%	7.9%
Census Tract 5.01								
Actual proportions	84.6%	3.4%	7.4%	7.6%	86.6%	5.4%	5.1%	10.2%
Free market	67.9%	23.8%	4.3%	4.3%	60.6%	24.1%	9.1%	9.8%
Difference	16.7%	-20.4%	3.1%	3.3%	25.9%	-18.7%	-4.0%	0.4%
Census Tract 5.02								
Actual proportions	87.3%	4.5%	2.6%	5.9%	85.1%	5.6%	3.2%	14.2%
Free market	70.0%	22.0%	4.3%	4.1%	62.6%	22.4%	9.2%	9.4%
Difference	17.3%	-17.5%	-1.7%	1.8%	22.5%	-16.8%	-6.0%	4.8%
Census Tract 6.00								
Actual proportions	88.8%	3.9%	3.6%	8.5%	85.6%	6.8%	5.3%	9.4%
Free market	71.9%	20.3%	4.4%	3.8%	66.6%	19.0%	9.7%	7.6%
Difference	17.0%	-16.4%	-0.8%	4.7%	19.0%	-12.1%	-4.4%	1.8%

Neighborhood Cluster 15 exhibits demographics similar to clusters 10 through 14. As in these other clusters, the high cost of housing alone may not explain these disparities.

While the actual proportion of white households has barely changed since 2000, the expected proportion has declined and the gap between actual and expected proportions of Caucasian households has increased in 2013–2017. The decline in the proportion of expected white households appears to be due at least in part to the increases in the expected proportions of Asian and Hispanic households.

Neighborhood Cluster 16

**Table 26: Neighborhood Cluster 16 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 16	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 16 (consists solely of census tract 16): Colonial Village, Shepherd Park, North Portal Estates								
Actual proportions	23.7%	70.1%	0.9%	2.8%	31.6%	65.5%	0.4%	1.3%
Free market	73.2%	19.0%	4.5%	3.7%	65.5%	19.8%	9.5%	8.4%
Difference	-49.5%	51.1%	-3.5%	-0.9%	-33.8%	45.7%	-9.1%	-7.1%

Neighborhood Cluster 16 has seen the differences between actual and expected proportions of white and African American households decline nearly 17 percentage points for White households and about five points for Black households. Nearly all of this shrinkage has taken place since 2010. The deficit between actual and expected proportions of Hispanic households of any race and Asian households have both increased since the turn of the century.

Neighborhood Cluster 17

**Table 27: Neighborhood Cluster 17 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 17	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 17: Takoma, Brightwood, Manor Park</b>								
Actual proportions	9.7%	81.6%	0.6%	8.6%	20.9%	65.2%	1.4%	16.6%
Free market	63.1%	28.4%	4.2%	4.6%	54.4%	29.7%	8.3%	12.0%
Difference	-53.3%	53.2%	-3.6%	4.0%	-33.5%	35.6%	-6.9%	4.6%
<b>Census Tract 17.01</b>								
Actual proportions	12.4%	76.2%	0.5%	8.0%	20.8%	61.9%	1.6%	20.4%
Free market	63.9%	27.7%	4.2%	4.5%	55.1%	28.9%	8.4%	12.2%
Difference	-51.5%	48.5%	-3.7%	3.5%	-34.3%	33.0%	-6.8%	8.2%
<b>Census Tract 17.02</b>								
Actual proportions	23.9%	73.6%	0.0%	1.7%	46.0%	44.3%	1.1%	10.5%
Free market	65.9%	25.8%	4.2%	4.4%	59.4%	25.0%	8.8%	10.7%
Difference	-42.0%	47.8%	-4.2%	-2.8%	-13.4%	19.3%	-7.7%	-0.2%
<b>Census Tract 18.03</b>								
Actual proportions	11.1%	76.8%	1.9%	13.6%	14.0%	64.9%	0.0%	24.5%
Free market	60.7%	30.7%	4.1%	4.8%	51.5%	32.4%	8.0%	13.0%
Difference	-49.5%	46.2%	-2.3%	8.8%	-37.5%	32.6%	-8.0%	11.6%
<b>Census Tract 18.04</b>								
Actual proportions	5.4%	81.4%	0.0%	15.6%	7.4%	77.1%	1.5%	19.9%
Free market	60.7%	30.6%	4.1%	4.8%	50.6%	33.3%	8.0%	12.7%
Difference	-55.4%	50.8%	-4.1%	10.8%	-43.2%	43.8%	-6.5%	7.2%
<b>Census Tract 19.01</b>								
Actual proportions	4.2%	91.1%	0.0%	4.4%	22.9%	68.3%	3.3%	7.2%
Free market	64.3%	27.3%	4.2%	4.6%	55.9%	28.4%	8.5%	11.4%
Difference	-60.1%	63.8%	-4.2%	-0.2%	-32.9%	39.9%	-5.3%	-4.2%
<b>Census Tract 19.02</b>								
Actual proportions	6.7%	90.7%	1.2%	1.0%	21.2%	71.7%	1.0%	14.8%
Free market	65.8%	25.9%	4.3%	4.5%	57.5%	26.9%	8.6%	11.2%
Difference	-59.0%	64.8%	-3.0%	-3.5%	-36.3%	44.8%	-7.6%	3.6%

Most of Neighborhood Cluster 17 has seen the actual proportions of White households significantly increase since the turn of the century. Overall, the proportion of White households has more than doubled while the difference between actual and expected proportions has fallen by 20 percentage points. The expected proportions of White and Black households have changed only by about nine and one percentage point respectively.

The past 17 years have seen a substantial in-migration of Hispanics that has contributed to the increase in the proportion of whites. The actual proportions of Asian households and households of Hispanics of

any race are within expectations except in tracts 18.04 and 18.03 respectively. The cost of housing alone may not explain the disparities between actual and expected proportions in this cluster.

Given that the actual proportions of Black households continues to exceed the expected proportions in a free market by more than 35 percentage points (53 points in 2000), the District can take steps to consolidate Cluster 17 into a unitary housing market that achieves expected free market proportions of each demographic group over the long term. Curtailing any continuing housing discrimination in Cluster 17 would help achieve this aim.

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Neighborhood Cluster 18

**Table 28: Neighborhood Cluster 18 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 18	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 18: Brightwood Park, Crestwood, Petworth</b>								
Actual proportions	7.4%	83.0%	1.1%	8.9%	25.7%	59.5%	2.6%	14.1%
Free market	62.4%	29.1%	4.2%	4.6%	56.5%	27.8%	8.6%	11.3%
Difference	-55.0%	53.9%	-3.1%	4.3%	-30.8%	31.7%	-6.0%	2.8%
<b>Census Tract 20.02</b>								
Actual proportions	10.4%	79.3%	0.5%	10.6%	28.9%	57.5%	1.1%	15.9%
Free market	64.6%	27.0%	4.2%	4.5%	58.3%	26.2%	8.6%	10.9%
Difference	-54.2%	52.2%	-3.7%	6.2%	-29.5%	31.3%	-7.5%	4.9%
<b>Census Tract 21.01</b>								
Actual proportions	3.3%	86.2%	0.3%	10.7%	13.2%	68.8%	2.5%	15.9%
Free market	60.7%	30.7%	4.1%	4.8%	53.4%	30.3%	8.3%	12.7%
Difference	-57.4%	55.6%	-3.9%	5.9%	-40.2%	38.5%	-5.8%	3.1%
<b>Census Tract 21.02</b>								
Actual proportions	3.4%	92.4%	0.0%	4.2%	13.2%	76.1%	0.0%	9.8%
Free market	61.5%	29.9%	4.1%	4.8%	55.9%	28.3%	8.6%	11.3%
Difference	-58.1%	62.5%	-4.1%	-0.6%	-42.6%	47.7%	-8.6%	-1.5%
<b>Census Tract 22.01</b>								
Actual proportions	3.6%	87.7%	1.0%	8.1%	21.4%	68.5%	3.3%	6.6%
Free market	63.3%	28.3%	4.2%	4.5%	55.6%	29.0%	8.3%	11.3%
Difference	-59.6%	59.4%	-3.2%	3.6%	-34.2%	39.6%	-5.0%	-4.7%
<b>Census Tract 22.02</b>								
Actual proportions	2.4%	92.3%	0.3%	4.5%	12.6%	73.1%	0.0%	14.0%
Free market	61.4%	30.0%	4.1%	4.8%	53.7%	30.2%	8.3%	12.5%
Difference	-59.0%	62.3%	-3.8%	-0.3%	-41.1%	42.8%	-8.3%	1.5%
<b>Census Tract 23.01</b>								
Actual proportions	4.0%	91.5%	0.7%	3.3%	32.6%	54.9%	1.7%	10.7%
Free market	63.0%	28.5%	4.2%	4.6%	60.3%	24.3%	9.0%	10.2%
Difference	-59.0%	63.0%	-3.5%	-1.3%	-27.7%	30.6%	-7.4%	0.6%

### District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017

Neighborhood Cluster 18	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Census Tract 24.00</b>								
Actual proportions	3.3%	89.6%	0.6%	6.2%	40.2%	50.9%	1.8%	11.4%
Free market	60.3%	31.0%	4.2%	4.7%	59.5%	25.0%	8.8%	11.0%
Difference	-57.0%	58.6%	-3.7%	1.5%	-19.3%	25.9%	-7.0%	0.5%
<b>Census Tract 25.01</b>								
Actual proportions	15.3%	72.6%	2.4%	10.5%	28.5%	54.8%	3.1%	19.3%
Free market	63.6%	27.9%	4.3%	4.4%	54.4%	30.2%	8.7%	10.3%
Difference	-48.3%	44.7%	-1.9%	6.1%	-25.9%	24.5%	-5.5%	9.0%
<b>Census Tract 25.02</b>								
Actual proportions	8.5%	70.6%	3.6%	22.5%	29.1%	47.2%	6.0%	21.6%
Free market	60.3%	31.0%	4.1%	4.8%	54.9%	29.1%	8.5%	11.7%
Difference	-51.9%	39.7%	-0.6%	17.7%	-25.8%	18.1%	-2.5%	9.9%
<b>Census Tract 26.00</b>								
Actual proportions	31.0%	60.7%	2.2%	0.8%	54.3%	35.6%	5.2%	7.9%
Free market	70.2%	21.8%	4.4%	3.9%	64.2%	20.9%	9.3%	9.0%
Difference	-39.2%	38.8%	-2.3%	-3.1%	-9.9%	14.7%	-4.2%	-1.1%

Cluster 18 has seen the actual proportions of White households significantly increase since 2000. Overall, the proportion of White households has more than tripled while the difference between actual and expected proportions has fallen by almost 25 percentage points and the difference for Black households has declined by 22 points. The expected proportions of White and Black households have changed only by about six and less than two percentage points respectively.

Neighborhood Cluster 19

**Table 29: Neighborhood Cluster 19 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 19	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 19: Lamond Riggs, Queens Chapel, Fort Totten, Pleasant Hill</b>								
Actual proportions	3.8%	90.9%	0.8%	1.6%	11.2%	74.7%	1.7%	14.6%
Free market	61.5%	29.9%	4.1%	4.8%	52.5%	31.3%	8.2%	12.5%
Difference	-57.7%	61.0%	-3.4%	-3.2%	-41.4%	43.4%	-6.6%	2.0%
<b>Census Tract 95.01</b>								
Actual proportions	6.5%	84.1%	1.8%	3.0%	14.7%	66.4%	2.5%	23.1%
Free market	58.9%	32.4%	4.1%	4.9%	50.9%	32.6%	8.0%	13.5%
Difference	-52.5%	51.8%	-2.3%	-1.9%	-36.2%	33.8%	-5.5%	9.6%
<b>Census Tract 95.05</b>								
Actual proportions	4.9%	92.6%	0.5%	1.1%	10.1%	78.3%	0.9%	7.3%
Free market	63.3%	28.1%	4.2%	4.7%	54.7%	29.5%	8.6%	11.3%
Difference	-58.4%	64.5%	-3.7%	-3.6%	-44.6%	48.8%	-7.7%	-4.0%
<b>Census Tract 95.07</b>								
Actual proportions	1.8%	93.0%	0.0%	0.0%	6.9%	90.0%	0.0%	6.4%
Free market	62.6%	28.8%	4.1%	4.8%	55.0%	29.1%	8.3%	12.1%
Difference	-60.8%	64.2%	-4.1%	-4.8%	-48.1%	61.0%	-8.3%	-5.7%
<b>Census Tract 95.08</b>								
Actual proportions	0.4%	97.5%	0.0%	0.9%	9.3%	76.5%	1.9%	12.8%
Free market	63.0%	28.5%	4.2%	4.7%	51.9%	32.0%	8.2%	12.5%
Difference	-62.6%	69.1%	-4.2%	-3.9%	-42.6%	44.4%	-6.3%	0.4%

There has been a small influx of White households in all four census tracts. This might reflect a significant inflow of mostly white Hispanic households throughout the cluster. The percentage of white residents has been increasing since 2000 while the percentage of African American residents has been declining.

Except for tract 95.07, the actual proportions of Black households have declined significantly although they still remain 33.8 to 61 percentage points greater than would be expected in the absence of housing discrimination. Cluster 19, however, still appears to be in a dual housing market that has concentrated African American households there. The Fort Totten neighborhood, however, is undergoing some gentrification which could lead to massive displacement of lesser income Black households.

Neighborhood Cluster 20

**Table 30: Neighborhood Cluster 20 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 20	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 20: North Michigan Park, Michigan Park, University Heights</b>								
Actual proportions	11.0%	85.7%	0.7%	2.0%	22.6%	73.7%	1.5%	3.3%
Free market	64.8%	26.7%	4.2%	4.6%	57.2%	27.1%	8.7%	11.2%
Difference	-53.8%	59.0%	-3.5%	-2.6%	-34.6%	46.6%	-7.2%	-7.9%
<b>Census Tract 95.03</b>								
Actual proportions	10.6%	88.2%	0.0%	0.6%	19.6%	77.1%	2.8%	0.5%
Free market	66.8%	24.8%	4.3%	4.5%	59.0%	25.5%	8.9%	10.5%
Difference	-56.2%	63.4%	-4.3%	-3.9%	-39.4%	51.5%	-6.1%	-10.0%
<b>Census Tract 95.04</b>								
Actual proportions	21.0%	74.6%	1.6%	3.0%	35.5%	58.9%	1.7%	7.2%
Free market	62.7%	28.8%	4.2%	4.7%	57.4%	27.1%	8.7%	10.9%
Difference	-41.8%	45.8%	-2.6%	-1.7%	-21.9%	31.8%	-7.0%	-3.7%
<b>Census Tract 95.09</b>								
Actual proportions	0.6%	95.3%	0.4%	2.4%	12.4%	85.4%	0.0%	2.1%
Free market	65.2%	26.3%	4.2%	4.7%	55.3%	28.7%	8.5%	12.2%
Difference	-64.7%	69.0%	-3.8%	-2.2%	-42.9%	56.7%	-8.5%	-10.1%

As the differences between actual and expected proportions of White and African American households narrow, the degree of the segregation in Neighborhood Cluster 20 is somewhat less extreme. Note, however, that the difference in the actual and expected proportions of Hispanic households of any race has increased since 2000 with notably fewer Hispanic households than would be expected in the absence of housing discrimination in census tracts 95.03 and 95.09.

The increase in the actual proportion of White households and the decrease in the actual proportion of Black households started after 2008.

Since the expected proportions in a free market have barely changed since 2000, it would appear that the housing market in Cluster 20 is *beginning* to approach a unitary market in which all participate.

**Table 31: Neighborhood Cluster 21 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 21	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 21: Edgewood, Bloomingdate, Truxton Circle, Eckington</b>								
Actual proportions	6.3%	90.5%	0.0%	2.9%	37.0%	54.8%	3.3%	7.0%
Free market	59.6%	31.7%	4.2%	4.7%	56.3%	28.1%	8.7%	10.9%
Difference	-53.3%	58.8%	-4.2%	-1.8%	-19.3%	26.7%	-5.3%	-3.9%
<b>Census Tract 33.01</b>								
Actual proportions	8.0%	87.6%	0.0%	4.7%	42.4%	46.4%	4.3%	6.7%
Free market	62.1%	29.4%	4.2%	4.5%	61.8%	23.0%	9.2%	9.8%
Difference	-54.1%	58.2%	-4.2%	0.2%	-19.4%	23.4%	-4.9%	-3.0%
<b>Census Tract 33.02</b>								
Actual proportions	7.8%	89.9%	0.0%	2.7%	54.5%	37.6%	5.4%	3.2%
Free market	63.9%	27.6%	4.3%	4.5%	60.0%	24.8%	9.0%	9.8%
Difference	-56.1%	62.2%	-4.3%	-1.9%	-5.5%	12.8%	-3.6%	-6.6%
<b>Census Tract 46.00</b>								
Actual proportions	7.5%	90.9%	0.0%	1.7%	44.9%	50.9%	4.2%	4.7%
Free market	60.3%	31.1%	4.1%	4.8%	57.3%	27.4%	8.7%	10.5%
Difference	-52.8%	59.8%	-4.1%	-3.1%	-12.4%	23.5%	-4.5%	-5.8%
<b>Census Tract 87.01</b>								
Actual proportions	1.8%	95.6%	0.0%	1.3%	41.4%	55.0%	4.3%	10.7%
Free market	60.9%	30.5%	4.2%	4.7%	59.1%	25.6%	8.7%	10.6%
Difference	-59.0%	65.1%	-4.2%	-3.4%	-17.6%	29.4%	-4.4%	0.2%
<b>Census Tract 87.02</b>								
Actual proportions	4.2%	92.9%	0.0%	0.6%	35.8%	56.4%	3.0%	7.3%
Free market	58.1%	33.1%	4.2%	4.8%	54.1%	29.9%	8.5%	11.7%
Difference	-53.8%	59.7%	-4.2%	-4.1%	-18.4%	26.5%	-5.5%	-4.3%
<b>Census Tract 92.01</b>								
Actual proportions	12.5%	81.5%	0.0%	3.0%	45.5%	41.4%	4.6%	7.0%
Free market	57.3%	33.8%	4.3%	4.8%	57.2%	27.2%	8.8%	10.7%
Difference	-44.7%	47.7%	-4.3%	-1.8%	-11.7%	14.2%	-4.2%	-3.7%
<b>Census Tract 92.03</b>								
Actual proportions	3.8%	90.0%	0.0%	5.8%	22.3%	68.7%	0.8%	8.7%
Free market	59.4%	31.8%	4.1%	4.9%	54.8%	29.4%	8.5%	11.7%
Difference	-55.6%	58.1%	-4.1%	0.8%	-32.5%	39.3%	-7.7%	-3.0%
<b>Census Tract 92.04</b>								
Actual proportions	7.3%	92.7%	0.0%	2.4%	16.3%	76.0%	1.0%	8.0%
Free market	55.6%	35.5%	4.2%	4.8%	47.5%	36.4%	8.0%	12.4%
Difference	-48.3%	57.2%	-4.2%	-2.5%	-31.1%	39.6%	-6.9%	-4.4%

The pace of racial change in Neighborhood Cluster 21, part of the District's Fifth Ward, has accelerated since the 2006–2010 analysis of impediments was conducted. The actual proportion of white households has increase nearly six fold while the actual proportion of African American households has plummeted by about 36 percentage points. While these changes in actual proportions have generally brought them more in line with proportions expected in a discrimination–free housing market, the magnitude of these

changes in such a short period of time strongly suggests that gentrification in Bloomingdale, Edgewood, and beyond may be responsible for these trends. Complicating the analysis is that the expected proportion of Black households declined by fewer than five percentage points which suggests that the decline in the actual proportion of African American households could be due to discriminatory housing practices, not just gentrification.

In both 2000 and 2013-2017, the actual proportions of Hispanic households of any race and Asian households have remained what would be expected.

Neighborhood Cluster 22

**Table 32: Neighborhood Cluster 22 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 22	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 22: Brookland, Brentwood, Langdon</b>								
Actual proportions	7.5%	88.5%	0.3%	1.7%	20.5%	71.3%	1.5%	7.3%
Free market	61.3%	30.1%	4.2%	4.7%	54.2%	30.0%	8.4%	11.6%
Difference	-53.8%	58.4%	-3.9%	-3.0%	-33.7%	41.3%	-6.9%	-4.4%
<b>Census Tract 91.02</b>								
Actual proportions	0.6%	96.3%	0.0%	0.9%	11.8%	82.7%	0.7%	4.7%
Free market	58.2%	33.1%	4.2%	4.8%	51.4%	32.6%	8.2%	12.1%
Difference	-57.5%	63.2%	-4.2%	-3.8%	-39.5%	50.1%	-7.5%	-7.4%
<b>Census Tract 93.01</b>								
Actual proportions	19.9%	73.4%	0.8%	3.4%	29.9%	59.1%	3.3%	4.1%
Free market	64.9%	26.7%	4.2%	4.6%	58.6%	25.9%	8.8%	10.8%
Difference	-45.0%	46.7%	-3.4%	-1.3%	-28.7%	33.2%	-5.5%	-6.7%
<b>Census Tract 93.02</b>								
Actual proportions	0.7%	99.3%	0.0%	0.0%	34.6%	52.8%	0.6%	25.5%
Free market	63.4%	28.2%	4.1%	4.7%	55.5%	28.7%	8.4%	11.6%
Difference	-62.7%	71.2%	-4.1%	-4.7%	-20.9%	24.1%	-7.8%	13.9%

Neighborhood Cluster 22 has become more racially and ethnically diverse since 2000, as seen in tract 93.02. In Cluster 22, as in those other clusters, the magnitude of these changes in such a short period of time strongly suggests that the sort of gentrification taking place in the Brookland neighborhood is likely responsible for this massive turnover and displacement of African American households of modest means.

The actual proportion of Hispanic households in tract 93.02 has increased from essentially zero in 2000 to more than 25 percent in 2013–2017 — nearly 14 percentage points higher than would be expected in the absence of housing discrimination. The huge rise in the proportion of white households since 2000 is likely due in large part to the substantial in-migration of Hispanics households that are largely Caucasian since Hispanics in the District generally identify as Caucasian.

Neighborhood Cluster 23

**Table 33: Neighborhood Cluster 23 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 23	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 23: Ivy City, Arboretum, Trinidad, Carver Langston</b>								
Actual proportions	0.9%	97.3%	0.4%	1.0%	15.3%	78.4%	2.8%	4.8%
Free market	56.2%	34.9%	4.1%	4.9%	50.5%	33.4%	8.1%	12.5%
Difference	-55.4%	62.3%	-3.8%	-3.8%	-35.1%	45.0%	-5.3%	-7.7%
<b>Census Tract 88.02</b>								
Actual proportions	0.8%	97.2%	0.8%	1.0%	27.7%	70.8%	0.4%	3.3%
Free market	58.4%	32.9%	4.1%	4.8%	54.2%	29.9%	8.5%	11.7%
Difference	-57.5%	64.3%	-3.4%	-3.8%	-26.5%	40.8%	-8.1%	-8.4%
<b>Census Tract 88.03</b>								
Actual proportions	3.0%	95.2%	0.0%	0.0%	5.4%	83.8%	3.1%	8.2%
Free market	54.3%	36.9%	4.1%	4.8%	47.6%	36.4%	8.1%	12.0%
Difference	-51.3%	58.3%	-4.1%	-4.8%	-42.1%	47.4%	-5.0%	-3.7%
<b>Census Tract 88.04</b>								
Actual proportions	0.0%	96.6%	0.8%	2.3%	11.7%	79.1%	4.6%	4.5%
Free market	55.6%	35.6%	4.1%	5.0%	50.4%	33.5%	7.8%	13.0%
Difference	-55.6%	61.0%	-3.3%	-2.7%	-38.7%	45.7%	-3.3%	-8.5%
<b>Census Tract 89.03</b>								
Actual proportions	1.2%	96.1%	0.0%	0.6%	17.9%	75.0%	3.1%	3.1%
Free market	57.1%	34.1%	4.1%	4.9%	50.6%	33.2%	8.0%	12.8%
Difference	-55.9%	62.0%	-4.1%	-4.4%	-32.7%	41.8%	-4.9%	-9.7%
<b>Census Tract 89.04</b>								
Actual proportions	0.7%	99.3%	0.0%	0.8%	6.3%	86.9%	3.8%	6.6%
Free market	54.4%	36.7%	4.2%	4.8%	47.6%	36.0%	8.1%	12.7%
Difference	-53.7%	62.6%	-4.2%	-4.1%	-41.3%	50.9%	-4.3%	-6.2%

Neighborhood Cluster 23 is experiencing an increase of White households including a smaller in-migration of Hispanic households. Tract 88.02 has seen an increase in the actual proportion of White households of about 27 percentage points. More modest increases have occurred in the other four tracts. .

Neighborhood Cluster 24

**Table 34: Neighborhood Cluster 24 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 24	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 24: Woodridge, Fort Lincoln, Gateway</b>								
Actual proportions	2.5%	94.2%	0.9%	1.7%	13.1%	83.7%	0.6%	5.7%
Free market	61.3%	30.1%	4.3%	4.6%	54.6%	29.7%	8.5%	11.1%
Difference	-58.8%	64.1%	-3.4%	-2.9%	-41.5%	54.0%	-7.9%	-5.4%
<b>Census Tract 90.00</b>								
Actual proportions	0.9%	97.2%	0.0%	1.8%	4.7%	93.9%	0.5%	3.4%
Free market	55.5%	35.6%	4.3%	4.7%	51.6%	32.7%	8.3%	11.3%
Difference	-54.6%	61.5%	-4.3%	-2.9%	-46.9%	61.2%	-7.8%	-7.9%
<b>Census Tract 91.01</b>								
Actual proportions	2.9%	94.8%	1.5%	1.3%	17.7%	77.4%	1.0%	9.6%
Free market	61.7%	29.7%	4.2%	4.6%	55.2%	29.2%	8.6%	11.1%
Difference	-58.8%	65.1%	-2.7%	-3.3%	-37.4%	48.2%	-7.6%	-1.5%
<b>Census Tract 94.00</b>								
Actual proportions	3.5%	91.0%	0.9%	2.0%	18.4%	78.1%	0.4%	4.7%
Free market	65.9%	25.7%	4.3%	4.5%	57.7%	26.8%	8.6%	11.0%
Difference	-62.4%	65.3%	-3.3%	-2.5%	-39.3%	51.2%	-8.2%	-6.3%

Neighborhood Cluster 24 is experiencing a decline in racial segregation with small percentages of White households in 2000 growing substantially in tracts 91.01 and 94.00. Tract 90 still appears hyper-segregated.

Neighborhood Cluster 25

**Table 35: Neighborhood Cluster 25 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 25	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 25: NoMa, Union Station, Stanton Park, Kingman Park</b>								
Actual proportions	36.5%	60.1%	1.3%	2.3%	64.4%	27.6%	3.2%	3.1%
Free market	63.4%	28.2%	4.2%	4.6%	60.2%	24.6%	9.0%	10.0%
Difference	-26.8%	31.9%	-2.9%	-2.3%	4.3%	3.0%	-5.8%	-6.8%
<b>Census Tract 79.01</b>								
Actual proportions	0.5%	97.1%	1.0%	1.0%	22.8%	68.9%	0.4%	3.5%
Free market	55.5%	35.6%	4.2%	4.9%	52.5%	31.6%	8.4%	11.5%
Difference	-55.0%	61.5%	-3.1%	-3.8%	-29.7%	37.3%	-8.0%	-8.1%
<b>Census Tract 79.03</b>								
Actual proportions	0.0%	100.0%	0.0%	0.0%	25.6%	68.7%	2.1%	2.3%
Free market	60.7%	30.7%	4.2%	4.8%	56.0%	28.2%	8.6%	11.5%
Difference	-60.7%	69.3%	-4.2%	-4.8%	-30.4%	40.6%	-6.5%	-9.2%
<b>Census Tract 80.01</b>								
Actual proportions	15.8%	81.0%	0.5%	1.4%	63.2%	25.7%	1.5%	3.1%
Free market	62.7%	28.8%	4.2%	4.6%	62.9%	22.1%	9.3%	9.2%
Difference	-46.9%	52.3%	-3.7%	-3.2%	0.3%	3.6%	-7.8%	-6.1%
<b>Census Tract 80.02</b>								
Actual proportions	29.1%	67.8%	1.3%	1.9%	65.0%	30.4%	1.2%	5.4%
Free market	64.3%	27.2%	4.3%	4.5%	60.8%	24.0%	9.0%	10.0%
Difference	-35.2%	40.6%	-3.0%	-2.6%	4.3%	6.4%	-7.8%	-4.6%
<b>Census Tract 81.00</b>								
Actual proportions	65.2%	30.5%	1.9%	1.9%	80.3%	8.6%	3.2%	5.7%
Free market	68.0%	23.7%	4.3%	4.3%	63.8%	21.2%	9.2%	9.4%
Difference	-2.9%	6.7%	-2.3%	-2.4%	16.5%	-12.6%	-6.1%	-3.7%
<b>Census Tract 82.00</b>								
Actual proportions	87.7%	8.4%	2.1%	3.5%	90.9%	3.4%	1.6%	4.5%
Free market	67.3%	24.4%	4.2%	4.4%	61.6%	23.3%	9.0%	9.9%
Difference	20.3%	-16.0%	-2.2%	-0.9%	29.4%	-19.9%	-7.4%	-5.3%
<b>Census Tract 83.01</b>								
Actual proportions	70.3%	24.0%	2.9%	5.1%	85.5%	9.6%	1.9%	6.5%
Free market	68.1%	23.6%	4.3%	4.3%	63.9%	21.2%	9.5%	8.7%
Difference	2.2%	0.3%	-1.4%	0.8%	21.5%	-11.6%	-7.6%	-2.2%

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 25	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Census Tract 83.02</b>								
Actual proportions	67.6%	30.2%	1.6%	3.2%	72.0%	17.5%	8.2%	2.2%
Free market	67.6%	24.2%	4.3%	4.3%	62.5%	22.4%	9.2%	9.7%
Difference	0.1%	6.1%	-2.8%	-1.1%	9.5%	-4.9%	-1.0%	-7.5%
<b>Census Tract 84.02</b>								
Actual proportions	24.6%	71.1%	1.8%	1.0%	64.5%	32.5%	0.8%	1.5%
Free market	58.9%	32.4%	4.2%	4.7%	57.6%	27.1%	8.8%	10.2%
Difference	-34.3%	38.7%	-2.4%	-3.7%	6.9%	5.5%	-8.0%	-8.7%
<b>Census Tract 84.10</b>								
Actual proportions	9.2%	86.5%	0.0%	4.2%	55.6%	34.2%	5.7%	4.1%
Free market	62.6%	28.9%	4.1%	4.7%	61.9%	23.0%	9.2%	9.2%
Difference	-53.4%	57.7%	-4.1%	-0.5%	-6.3%	11.2%	-3.5%	-5.1%
<b>Census Tract 85.00</b>								
Actual proportions	4.5%	92.7%	0.0%	2.7%	69.0%	21.0%	6.6%	0.0%
Free market	60.1%	31.2%	4.2%	4.8%	60.1%	24.6%	9.1%	9.9%
Difference	-55.6%	61.5%	-4.2%	-2.0%	8.8%	-3.6%	-2.5%	-9.9%
<b>Census Tract 86.00 (14 households in 2000 and 55 households in 2013–2017)</b>								
Actual proportions	14 Households				55 Households			
Free market	Number of households too small to make				Number of households too small to make			
Difference	reliable estimates				reliable estimates			

While the expected proportion of Black households in Neighborhood Cluster 25 declined by fewer than four percentage points since 2000, the actual proportion fell substantially, from 60.1 percent in 2000 to 27.6 percent in 2013–2017. Also, while the expected proportion of White households fell by just 3.2 percentage points since 2000, the actual proportion increased from 36.5 percent in 2000 to 64.4 percent in 2013–2017. Gentrification in NoMa and Kingman Park may account for most of these changes. However, the changes have occurred in nearly every census tract in Cluster 25. In tract 85.00, the actual proportion of White households grew from 4.5 percent in 2000 to 69 percent in 2013–2017 while the actual Black proportion fell from 92.7 percent to 21 percent — proportions that would be expected in a housing market absent discrimination.

In 2000, just three of the 13 census tracts in Neighborhood Cluster 25 had a racial composition close to what would be expected in a housing market without discrimination. By 2017, five tracts met that criterion with a sixth tract (84.10) very close. As the 2006–2010 analysis of impediments reported, by 2010 the racial composition of the cluster as a whole and most of its census tracts had moved closer to what would have been expected in a free housing market at the turn of the century. Tracts 79.01, 79.03, 80.01, 80.02, 84.01, 84.02, and 85.00 which had very low proportions of white households in 2000, experienced varying levels of white in-migration during the decade. It is very possible that gentrification is displacing lesser-income African American households.

Neighborhood Cluster 26

**Table 36: Neighborhood Cluster 26 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 26	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 26: Capitol Hill, Lincoln Park</b>								
Actual proportions	61.3%	34.3%	2.2%	2.0%	77.1%	16.8%	2.7%	4.8%
Free market	67.9%	25.8%	4.4%	4.4%	62.2%	22.8%	9.2%	9.4%
Difference	-6.6%	8.5%	-2.2%	-2.5%	<b>14.9%</b>	-6.0%	-6.5%	-4.6%
<b>Census Tract 65.00</b>								
Actual proportions	83.7%	10.9%	4.0%	1.7%	90.0%	5.5%	0.0%	8.6%
Free market	69.1%	22.7%	4.3%	4.3%	61.8%	23.0%	9.1%	9.8%
Difference	<b>14.6%</b>	<b>-11.8%</b>	-0.3%	-2.7%	<b>28.2%</b>	<b>-17.5%</b>	-9.1%	-1.2%
<b>Census Tract 66.00</b>								
Actual proportions	89.4%	6.2%	2.4%	0.6%	89.6%	0.8%	5.2%	4.9%
Free market	69.7%	22.3%	4.4%	4.0%	62.3%	22.6%	9.1%	9.7%
Difference	<b>19.8%</b>	<b>-16.1%</b>	-1.9%	-3.5%	<b>27.4%</b>	<b>-21.8%</b>	-3.9%	-4.8%
<b>Census Tract 67.00</b>								
Actual proportions	75.1%	20.1%	1.9%	3.7%	83.2%	11.3%	2.6%	3.6%
Free market	70.3%	21.7%	4.4%	4.1%	63.9%	21.3%	9.5%	8.7%
Difference	4.9%	-1.6%	-2.4%	-0.4%	<b>19.3%</b>	-9.9%	-6.8%	-5.1%
<b>Census Tract 68.01</b>								
Actual proportions	10.0%	86.2%	0.0%	2.1%	46.5%	43.9%	5.9%	4.5%
Free market	58.9%	32.3%	4.2%	4.8%	57.0%	27.3%	8.8%	10.8%
Difference	<b>-48.9%</b>	<b>53.8%</b>	-4.2%	-2.6%	<b>-10.6%</b>	<b>16.6%</b>	-2.8%	-6.3%
<b>Census Tract 68.02</b>								
Actual proportions	20.1%	79.9%	0.0%	1.1%	65.2%	30.7%	1.6%	3.3%
Free market	60.9%	30.5%	4.3%	4.5%	63.3%	21.8%	9.3%	9.0%
Difference	<b>-40.8%</b>	<b>49.4%</b>	-4.3%	-3.5%	1.9%	9.0%	-7.7%	-5.7%
<b>Census Tract 68.04</b>								
Actual proportions	180 Households				46 households			
Free market	Number of households too small to make reliable estimates				Number of households too small to make reliable estimates			
Difference								
<b>Census Tract 69.00</b>								
Actual proportions	44.1%	51.0%	2.4%	2.7%	74.6%	21.8%	2.6%	2.1%
Free market	63.3%	28.2%	4.4%	4.3%	63.0%	22.1%	9.3%	8.9%
Difference	<b>-19.2%</b>	<b>22.8%</b>	-2.0%	-1.6%	<b>11.6%</b>	-0.3%	-6.7%	-6.8%
<b>Census Tract 70.00</b>								
Actual proportions	71.1%	22.5%	5.7%	1.7%	83.6%	9.0%	1.9%	7.3%
Free market	67.8%	24.0%	4.3%	4.3%	62.3%	22.6%	9.2%	9.6%
Difference	3.2%	-1.5%	1.5%	-2.6%	<b>21.3%</b>	<b>-13.6%</b>	-7.3%	-2.2%

About half of the census tracts in Neighborhood Cluster 26 appear to be moving *toward* integration while the other half appear to be moving *away* from integration — suggesting that the dual housing market is in play here. The expected proportions of White and Black households have changed very little since 2000 while the proportions of Asian and Hispanic households have doubled, albeit still in single digits.

But data for the entire cluster mask that the actual racial composition in six of the seven tracts for which we have adequate data differ substantially from expected proportions. Four of the seven tracts appear to be moving away from racial integration — 65.00, 66.00, 67.00, and 70.00 — while the other three have been moving toward racial integration. The differences between actual and expected proportions of White and Black households in the former group of tracts have widened since 2000 while those differences have shrunk in the latter group of tracts.

Tract 66.00 is notable due to the already low proportion of African American households (6.2 percent) in 2000 — well below the 22.3 percent expected in a discrimination-free housing market. By 2013–2017, the actual proportion was only 0.8 percent, while the proportion in a free market remained virtually unchanged at 22.6 percent.

In all of the other measurable tracts, the actual proportions of African American households have been reduced by 50 percent or more while the expected proportions have remained roughly the same in half of the six tracts.

It appears that Neighborhood Cluster 26 has experienced both gentrification (Capitol Hill) and housing discrimination — otherwise it's impossible to explain the oft-startling decline in the proportion of Black households while the expected proportions have changed so modestly. It is *possible* that African American households that can afford the housing here are being steered away from Cluster 26 either by real estate agents or by self-steering. It is *possible* that Black households are facing discrimination in mortgage lending. And it is possible that gentrification is contributing to these demographic changes.

Neighborhood Cluster 27

**Table 37: Neighborhood Cluster 27 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 27	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 27: Near Southeast, Navy Yard</b>								
Actual proportions	8.2%	88.4%	0.3%	2.1%	62.2%	30.7%	4.0%	5.1%
Free market	53.8%	37.3%	4.4%	4.5%	57.5%	27.2%	8.8%	10.2%
Difference	-45.6%	51.0%	-4.1%	-2.4%	4.7%	3.5%	-4.8%	-5.2%
<b>Census Tract 71.00</b>								
Actual proportions	12.9%	81.5%	0.5%	3.8%	44.4%	43.9%	6.5%	4.9%
Free market	56.7%	34.5%	4.3%	4.6%	54.5%	30.1%	8.6%	10.4%
Difference	-43.9%	47.0%	-3.9%	-0.8%	-10.1%	13.9%	-2.1%	-5.6%
<b>Census Tract 72.00</b>								
Actual proportions	2.3%	97.0%	0.0%	0.0%	71.1%	24.1%	2.7%	5.2%
Free market	50.0%	40.9%	4.4%	4.5%	59.0%	25.7%	8.9%	10.1%
Difference	-47.7%	56.1%	-4.4%	-4.5%	12.1%	-1.6%	-6.1%	-4.9%

Neighborhood Cluster 27 has observed considerable in-migration of White households and exit of Black households. Consequently, the differences between the actual and expected proportions of Caucasian and Black households have narrowed for the entire cluster. This change may have resulted from gentrification.

Neighborhood Cluster 28

**Table 38: Neighborhood Cluster 28 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 28	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 28: Historic Anacostia</b>								
Actual proportions	1.0%	97.9%	0.3%	0.0%	4.1%	94.4%	0.0%	1.2%
Free market	55.9%	35.3%	4.1%	4.8%	47.4%	36.7%	8.0%	11.7%
Difference	-54.9%	62.6%	-3.8%	-4.8%	-43.3%	57.7%	-8.0%	-10.5%
<b>Census Tract 75.03</b>								
Actual proportions	2.0%	97.2%	0.0%	0.0%	6.2%	90.6%	0.0%	2.7%
Free market	56.7%	34.6%	4.2%	4.7%	47.8%	36.0%	8.0%	12.3%
Difference	-54.8%	62.7%	-4.2%	-4.7%	-41.6%	54.6%	-8.0%	-9.6%
<b>Census Tract 75.04</b>								
Actual proportions	0.0%	98.7%	0.7%	0.0%	2.2%	97.8%	0.0%	0.0%
Free market	55.1%	36.1%	4.1%	4.9%	47.1%	37.3%	8.0%	11.2%
Difference	-55.1%	62.6%	-3.4%	-4.9%	-44.8%	60.5%	-8.0%	-11.2%

Neighborhood Cluster 28 continues to exhibit characteristics of hyper-segregation. While the expected shares of Asian or Hispanic households were small in Cluster 28 in 2000, their actual proportions throughout the cluster became even lower than expected by 2013–2017.

Neighborhood Cluster 29

**Table 39: Neighborhood Cluster 29 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 29	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 29: Eastland Gardens, Kenilworth (consists of only tract 96.01)								
Actual proportions	0.0%	97.9%	0.7%	0.0%	3.1%	95.2%	0.0%	1.1%
Free market	59.9%	31.4%	4.2%	4.8%	47.9%	35.8%	7.8%	13.2%
Difference	-59.9%	66.5%	-3.6%	-4.8%	-44.8%	59.4%	-7.8%	-12.1%

Neighborhood Cluster 29 continues to be hyper-segregated. The differences between actual and expected proportions of White and Black households have declined slightly. The difference between the actual and expected proportions of Hispanic households has increased. The same holds true, but to a lesser extent, for Asian households.

Neighborhood Cluster 30

**Table 40: Neighborhood Cluster 30 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 30	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 30: Mayfair, Hillbrook, Mahanig Heights</b>								
Actual proportions	0.5%	98.0%	0.2%	1.2%	2.5%	92.4%	0.3%	4.0%
Free market	56.1%	35.0%	4.2%	4.9%	47.5%	36.1%	7.9%	13.1%
Difference	-55.6%	62.9%	-4.0%	-3.7%	-45.0%	56.3%	-7.6%	-9.1%
<b>Census Tract 78.03</b>								
Actual proportions	0.9%	96.5%	0.4%	1.8%	3.7%	89.5%	0.5%	5.3%
Free market	57.6%	33.6%	4.1%	4.9%	49.7%	34.0%	8.0%	13.1%
Difference	-56.7%	62.9%	-3.7%	-3.1%	-45.9%	55.4%	-7.4%	-7.8%
<b>Census Tract 96.02</b>								
Actual proportions	0.0%	99.5%	0.0%	0.5%	1.3%	95.3%	0.0%	2.8%
Free market	54.6%	36.5%	4.2%	4.9%	45.5%	38.2%	7.7%	13.2%
Difference	-54.6%	63.0%	-4.2%	-4.3%	-44.1%	57.2%	-7.7%	-10.4%

Hyper-segregation persists in Neighborhood Cluster 30, as seen in the high shares of black households. Also, the actual proportions of Hispanic and Asian households are lower than expected in a housing market absent discrimination.

Neighborhood Cluster 31

**Table 41: Neighborhood Cluster 31 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 31	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 31: Deanwood, Burrville, Grant Park, Lincoln Heights, Fairmont Heights								
Actual proportions	0.7%	97.4%	0.2%	0.7%	0.9%	96.4%	0.6%	2.2%
Free market	57.3%	33.9%	4.2%	4.8%	49.6%	34.0%	8.0%	13.1%
Difference	-56.6%	63.6%	-4.1%	-4.0%	-48.7%	62.3%	-7.4%	-10.9%
Census Tract 78.04								
Actual proportions	0.0%	96.8%	0.7%	0.0%	0.0%	97.2%	0.7%	1.8%
Free market	56.1%	35.1%	4.2%	4.7%	50.3%	33.6%	8.2%	12.3%
Difference	-56.1%	61.7%	-3.5%	-4.7%	-50.3%	63.7%	-7.5%	-10.5%
Census Tract 78.06								
Actual proportions	0.7%	98.6%	0.0%	1.3%	2.9%	96.8%	0.0%	0.3%
Free market	59.0%	32.3%	4.2%	4.8%	49.0%	34.4%	8.0%	13.5%
Difference	-58.2%	66.3%	-4.2%	-3.5%	-46.1%	62.4%	-8.0%	-13.2%
Census Tract 78.07								
Actual proportions	1.0%	96.6%	0.0%	1.0%	2.9%	94.9%	0.0%	2.7%
Free market	60.0%	31.3%	4.1%	4.8%	49.4%	34.3%	8.0%	13.1%
Difference	-59.0%	65.2%	-4.1%	-3.8%	-46.5%	60.6%	-8.0%	-10.4%
Census Tract 78.08								
Actual proportions	1.3%	97.2%	0.0%	0.6%	0.0%	96.6%	0.6%	3.3%
Free market	56.3%	34.8%	4.2%	4.7%	49.1%	34.8%	8.0%	12.4%
Difference	-55.0%	62.4%	-4.2%	-4.1%	-49.1%	61.8%	-7.5%	-9.1%
Census Tract 78.09								
Actual proportions	0.4%	97.9%	0.0%	1.0%	0.0%	96.0%	1.3%	2.2%
Free market	56.8%	34.3%	4.2%	4.8%	50.1%	33.3%	7.7%	14.2%
Difference	-56.4%	63.7%	-4.2%	-3.8%	-50.1%	62.7%	-6.4%	-12.0%

Hyper-segregation is more pronounced in Neighborhood Cluster 31. The recommendations for clusters 28 through 30 hold true here too.

Neighborhood Cluster 32

**Table 42: Neighborhood Cluster 32 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 32	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 32: River Terrace, Benning, Greenway, Fort Dupont</b>								
Actual proportions	0.4%	97.6%	0.3%	0.6%	0.9%	95.5%	0.2%	2.6%
Free market	57.6%	33.6%	4.1%	4.9%	48.8%	34.9%	7.9%	13.0%
Difference	<b>-57.1%</b>	<b>64.0%</b>	-3.9%	-4.2%	<b>-47.9%</b>	<b>60.6%</b>	-7.7%	<b>-10.3%</b>
<b>Census Tract 77.03</b>								
Actual proportions	0.2%	97.5%	0.0%	1.6%	0.0%	96.1%	0.6%	2.6%
Free market	56.6%	34.5%	4.2%	4.9%	47.1%	36.6%	8.0%	12.8%
Difference	<b>-56.5%</b>	<b>63.1%</b>	-4.2%	-3.3%	<b>-47.1%</b>	<b>59.5%</b>	-7.4%	<b>-10.2%</b>
<b>Census Tract 77.08</b>								
Actual proportions	0.0%	98.1%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%
Free market	56.3%	34.8%	4.1%	4.9%	48.2%	35.4%	7.8%	13.2%
Difference	<b>-56.3%</b>	<b>63.3%</b>	-4.1%	-4.9%	<b>-48.2%</b>	<b>64.6%</b>	-7.8%	<b>-13.2%</b>
<b>Census Tract 96.03</b>								
Actual proportions	0.8%	97.7%	0.4%	0.0%	0.0%	94.5%	0.0%	4.2%
Free market	58.2%	33.0%	4.2%	4.9%	49.9%	33.8%	7.9%	13.3%
Difference	<b>-57.4%</b>	<b>64.7%</b>	-3.8%	-4.9%	<b>-49.9%</b>	<b>60.7%</b>	-7.9%	-9.0%
<b>Census Tract 96.04</b>								
Actual proportions	1.0%	97.0%	1.0%	0.7%	5.6%	90.4%	0.0%	3.1%
Free market	59.7%	31.6%	4.2%	4.8%	51.8%	32.1%	8.1%	12.7%
Difference	<b>-58.7%</b>	<b>65.4%</b>	-3.2%	-4.1%	<b>-46.2%</b>	<b>58.3%</b>	-8.1%	-9.6%

The demographics of Neighborhood Cluster 32 reveal hyper-segregation. Tract 96.04 is the only tract that shows even the slightest movement away from this extreme. Actual proportions of Asian households and to a greater degree, Hispanic households of any race have not kept pace with the proportions expected in a housing market absent discrimination. The recommendations for clusters 28 through 30 apply here too.

Neighborhood Cluster 33

**Table 43: Neighborhood Cluster 33 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 33	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 33: Capitol View, Marshall Heights, Benning Heights</b>								
Actual proportions	0.2%	98.5%	0.5%	0.3%	1.4%	96.3%	0.1%	1.9%
Free market	57.1%	34.1%	4.2%	4.8%	49.3%	34.4%	8.1%	12.8%
Difference	-56.8%	64.4%	-3.7%	-4.5%	-47.9%	61.9%	-7.9%	-10.9%
<b>Census Tract 77.07</b>								
Actual proportions	1.0%	98.0%	0.3%	0.0%	1.4%	97.2%	0.0%	2.2%
Free market	60.2%	31.2%	4.1%	4.8%	50.2%	33.4%	8.0%	13.2%
Difference	-59.2%	66.9%	-3.8%	-4.8%	-48.8%	63.8%	-8.0%	-10.9%
<b>Census Tract 99.03</b>								
Actual proportions	0.0%	98.0%	0.6%	0.9%	5.9%	92.8%	0.0%	0.0%
Free market	55.3%	35.9%	4.3%	4.6%	53.3%	30.8%	8.3%	12.0%
Difference	-55.3%	62.1%	-3.7%	-3.8%	-47.4%	62.0%	-8.3%	-12.0%
<b>Census Tract 99.04</b>								
Actual proportions	0.0%	96.9%	2.0%	1.1%	0.5%	95.1%	0.0%	5.4%
Free market	55.7%	35.5%	4.2%	4.9%	48.6%	35.2%	8.3%	11.9%
Difference	-55.7%	61.4%	-2.2%	-3.8%	-48.2%	59.9%	-8.3%	-6.5%
<b>Census Tract 99.05</b>								
Actual proportions	0.0%	100.0%	0.0%	0.0%	1.3%	96.9%	0.0%	1.3%
Free market	57.1%	34.0%	4.1%	4.9%	48.8%	34.9%	8.1%	12.8%
Difference	-57.1%	66.0%	-4.1%	-4.9%	-47.5%	62.1%	-8.1%	-11.5%
<b>Census Tract 99.06</b>								
Actual proportions	0.0%	98.8%	0.0%	0.0%	1.0%	94.4%	1.1%	1.9%
Free market	55.8%	35.4%	4.2%	4.8%	49.0%	34.7%	7.9%	13.3%
Difference	-55.8%	63.4%	-4.2%	-4.8%	-48.0%	59.7%	-6.8%	-11.4%
<b>Census Tract 99.07</b>								
Actual proportions	0.0%	99.4%	0.6%	0.0%	0.0%	99.0%	0.0%	0.0%
Free market	56.0%	35.1%	4.3%	4.6%	47.1%	36.3%	7.9%	13.3%
Difference	-56.0%	64.3%	-3.7%	-4.6%	-47.1%	62.7%	-7.9%	-13.3%

Except for census tract 99.03, all tracts in Neighborhood Cluster 33 show continuing hyper-segregation. Actual proportions of Asian households and to a greater degree, Hispanic households of any race have not kept pace with the proportions expected in a housing market absent discrimination. The recommendations for clusters 28 through 30 also apply to Cluster 33.

Neighborhood Cluster 34

**Table 44: Neighborhood Cluster 34 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 34	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 34: Twinning, Fairlawn, Randle Highlands, Penn Branch, Fort Davis Park, Dupont Park								
Actual proportions	1.8%	95.6%	0.1%	0.6%	4.8%	91.3%	0.6%	2.4%
Free market	60.8%	30.5%	4.1%	4.8%	50.8%	33.1%	8.1%	12.4%
Difference	-59.1%	65.1%	-4.1%	-4.2%	-46.0%	58.2%	-7.6%	-10.0%
Census Tract 76.01								
Actual proportions	2.1%	94.7%	0.0%	0.4%	6.0%	89.8%	0.0%	4.0%
Free market	59.5%	31.8%	4.1%	4.9%	49.6%	34.1%	8.0%	12.9%
Difference	-57.4%	62.9%	-4.1%	-4.5%	-43.6%	55.7%	-8.0%	-8.9%
Census Tract 76.05								
Actual proportions	0.0%	98.2%	0.4%	0.0%	6.0%	89.8%	0.0%	4.0%
Free market	59.6%	31.7%	4.1%	4.9%	49.6%	34.1%	8.0%	12.9%
Difference	-59.6%	66.5%	-3.7%	-4.9%	-43.6%	55.7%	-8.0%	-8.9%
Census Tract 77.09								
Actual proportions	1.4%	96.7%	0.0%	1.2%	1.8%	94.7%	0.0%	1.2%
Free market	58.5%	32.8%	4.1%	4.9%	48.7%	35.1%	8.0%	12.7%
Difference	-57.1%	64.0%	-4.1%	-3.7%	-46.8%	59.5%	-8.0%	-11.6%
Census Tract 99.01								
Actual proportions	4.8%	92.9%	0.0%	0.5%	8.7%	90.0%	0.0%	0.6%
Free market	66.7%	24.9%	4.3%	4.4%	57.6%	26.7%	8.7%	11.2%
Difference	-61.9%	68.0%	-4.3%	-3.9%	-48.9%	63.4%	-8.7%	-10.6%
Census Tract 99.02								
Actual proportions	1.6%	94.8%	0.0%	1.3%	2.1%	95.6%	0.5%	0.0%
Free market	61.8%	29.5%	4.2%	4.8%	51.9%	32.0%	8.2%	12.6%
Difference	-60.3%	65.3%	-4.2%	-3.5%	-49.8%	63.6%	-7.7%	-12.6%

Neighborhood Cluster 34 exhibits the same levels of hyper-segregation as the neighborhood clusters to its east, albeit not quite as intense. Actual proportions of Asian households and to a greater degree, Hispanic households of any race have not kept pace with the proportions expected in a housing market absent discrimination. The recommendations for clusters 28 through 30 are warranted for Cluster 34 as well.

Neighborhood Cluster 35

**Table 45: Neighborhood Cluster 35 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 35	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 35: Fairfax Village, Naylor Gardens, Hillcrest, Summit Park</b>								
Actual proportions	6.4%	90.5%	0.4%	1.5%	7.0%	88.1%	0.6%	7.4%
Free market	60.7%	30.6%	4.2%	4.8%	51.1%	32.7%	8.2%	12.4%
Difference	-54.3%	59.8%	-3.7%	-3.3%	-44.1%	55.4%	-7.7%	-5.0%
<b>Census Tract 76.03</b>								
Actual proportions	7.2%	88.6%	0.0%	2.4%	8.8%	85.1%	1.0%	11.2%
Free market	60.0%	31.3%	4.2%	4.8%	51.0%	32.8%	8.3%	12.4%
Difference	-52.8%	57.3%	-4.2%	-2.4%	-42.1%	52.2%	-7.2%	-1.2%
<b>Census Tract 76.04</b>								
Actual proportions	5.5%	92.7%	0.9%	0.5%	4.9%	91.7%	0.0%	2.8%
Free market	61.6%	29.8%	4.1%	4.8%	51.4%	32.6%	8.2%	12.3%
Difference	-56.1%	62.9%	-3.2%	-4.3%	-46.5%	59.2%	-8.2%	-9.5%

While still suffering from hyper-segregation, there has been a slightly greater presence of White and Hispanic households of any race in Neighborhood Cluster 35 than in the clusters to its east. The actual proportions of Asian households and Hispanic households are closer to the percentages expected in a free housing market than in the clusters to the east.

Neighborhood Cluster 36

**Table 46: Neighborhood Cluster 36 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 36	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 36: Woodland/Fort Stanton, Garfield Heights, Knox Hill</b>								
Actual proportions	0.5%	98.7%	0.0%	0.2%	0.3%	97.6%	0.0%	0.4%
Free market	54.6%	36.5%	4.2%	4.8%	47.0%	36.7%	7.9%	12.9%
Difference	-54.1%	62.2%	-4.2%	-4.6%	-46.7%	60.9%	-7.9%	-12.5%
<b>Census Tract 74.08</b>								
Actual proportions	0.0%	98.6%	0.0%	0.0%	0.0%	94.6%	0.0%	0.9%
Free market	54.2%	36.9%	4.2%	4.8%	46.3%	37.5%	7.6%	13.0%
Difference	-54.2%	61.7%	-4.2%	-4.8%	-46.3%	57.1%	-7.6%	-12.0%
<b>Census Tract 75.02</b>								
Actual proportions	0.8%	98.8%	0.0%	0.3%	0.5%	99.5%	0.0%	0.0%
Free market	54.9%	36.3%	4.2%	4.7%	47.4%	36.3%	8.0%	12.8%
Difference	-54.1%	62.5%	-4.2%	-4.5%	-46.9%	63.2%	-8.0%	-12.8%

Neighborhood Cluster 36 is even more severely segregated than Cluster 35 to its east. The actual proportion of White households is almost immeasurable. The actual proportions of every group have remained stagnant this century. Actual proportions of Asian households and to a greater degree, Hispanic households have not kept pace with the proportions expected in a housing market absent discrimination.

Neighborhood Cluster 37

**Table 47: Neighborhood Cluster 37 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 37	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 37: Sheridan, Barry Farm, Buena Vista</b>								
Actual proportions	0.5%	98.1%	0.3%	0.3%	1.6%	93.4%	0.7%	3.4%
Free market	54.5%	36.7%	4.2%	4.8%	47.2%	36.7%	7.9%	12.5%
Difference	-54.0%	61.4%	-3.8%	-4.6%	-45.5%	56.7%	-7.2%	-9.1%
<b>Census Tract 74.01</b>								
Actual proportions	0.8%	98.4%	0.0%	0.8%	1.3%	94.5%	2.5%	2.6%
Free market	52.3%	38.7%	4.3%	4.7%	43.8%	40.1%	8.0%	11.9%
Difference	-51.6%	59.7%	-4.3%	-3.9%	-42.5%	54.4%	-5.4%	-9.3%
<b>Census Tract 74.06</b>								
Actual proportions	0.0%	99.1%	0.0%	0.0%	0.0%	87.7%	0.0%	8.3%
Free market	52.6%	38.5%	4.2%	4.8%	46.6%	37.3%	7.9%	12.5%
Difference	-52.6%	60.6%	-4.2%	-4.8%	-46.6%	50.4%	-7.9%	-4.3%
<b>Census Tract 74.07</b>								
Actual proportions	0.7%	96.8%	1.0%	0.0%	2.9%	96.4%	0.0%	0.8%
Free market	58.6%	32.7%	4.1%	4.9%	49.6%	34.2%	7.9%	12.9%
Difference	-57.9%	64.1%	-3.1%	-4.9%	-46.7%	62.2%	-7.9%	-12.1%

Neighborhood Cluster 37 is only marginally less hypersegregated than Cluster 36. Everything written above about Cluster 36 applies to Cluster 37 as well.

Neighborhood Cluster 38

**Table 48: Neighborhood Cluster 38 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 38	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Neighborhood Cluster 38: Douglass, Shipley Terrace</b>								
Actual proportions	0.5%	98.7%	0.0%	0.2%	2.1%	94.4%	0.9%	2.1%
Free market	54.6%	36.5%	4.2%	4.8%	48.7%	34.9%	8.0%	13.0%
Difference	-54.1%	62.2%	-4.2%	-4.6%	-46.5%	59.4%	-7.1%	-10.9%
<b>Census Tract 74.03</b>								
Actual proportions	0.0%	97.1%	0.0%	1.0%	2.9%	96.1%	0.0%	2.0%
Free market	57.3%	33.9%	4.1%	4.9%	46.5%	36.9%	8.0%	12.8%
Difference	-57.3%	63.2%	-4.1%	-4.0%	-43.6%	59.2%	-8.0%	-10.8%
<b>Census Tract 74.04</b>								
Actual proportions	0.0%	100.0%	0.0%	0.0%	1.5%	93.5%	0.7%	2.5%
Free market	51.1%	39.9%	4.4%	4.5%	51.5%	32.4%	8.2%	12.2%
Difference	-51.1%	60.1%	-4.4%	-4.5%	-50.0%	61.1%	-7.5%	-9.7%
<b>Census Tract 74.09</b>								
Actual proportions	0.0%	97.5%	0.0%	1.6%	2.1%	93.8%	1.7%	1.7%
Free market	53.9%	37.2%	4.2%	4.7%	48.0%	35.5%	7.8%	13.6%
Difference	-53.9%	60.3%	-4.2%	-3.1%	-45.8%	58.3%	-6.1%	-11.9%

The demographics of Neighborhood Cluster 38 are nearly a clone of Cluster 37 immediately to its north and Cluster 36 to its east. The observations about Cluster 36 are equally applicable to Cluster 37.

Neighborhood Cluster 39

**Table 49: Neighborhood Cluster 39 Free Market Analysis**

District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017								
Neighborhood Cluster 39	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Neighborhood Cluster 39: Congress Heights, Bellvue, Washington Highlands								
Actual proportions	1.2%	96.3%	0.5%	0.7%	1.9%	96.5%	0.1%	1.4%
Free market	56.8%	34.4%	4.2%	4.8%	48.0%	35.7%	8.0%	12.8%
Difference	-55.7%	61.9%	-3.7%	-4.1%	-46.1%	60.9%	-7.9%	-11.4%
Census Tract 73.02								
Actual proportions	3.1%	93.5%	0.0%	1.3%	4.7%	93.1%	0.0%	2.1%
Free market	60.1%	31.2%	4.1%	4.8%	49.1%	34.6%	8.1%	12.6%
Difference	-57.1%	62.2%	-4.1%	-3.5%	-44.4%	58.5%	-8.1%	-10.6%
Census Tract 73.04								
Actual proportions	0.6%	97.6%	0.0%	0.0%	6.5%	91.3%	0.0%	3.1%
Free market	55.3%	35.9%	4.2%	4.7%	49.0%	34.7%	8.1%	12.7%
Difference	-54.7%	61.7%	-4.2%	-4.7%	-42.4%	56.6%	-8.1%	-9.7%
Census Tract 97.00								
Actual proportions	0.0%	95.8%	0.0%	1.8%	0.0%	100.0%	0.0%	0.0%
Free market	59.8%	31.5%	4.1%	4.9%	48.7%	35.3%	7.9%	12.5%
Difference	-59.8%	64.3%	-4.1%	-3.1%	-48.7%	64.7%	-7.9%	-12.5%
Census Tract 98.01								
Actual proportions	0.0%	98.8%	0.0%	1.2%	1.5%	95.5%	0.0%	1.5%
Free market	53.5%	37.6%	4.3%	4.6%	45.9%	38.0%	7.8%	12.7%
Difference	-53.5%	61.1%	-4.3%	-3.4%	-44.4%	57.5%	-7.8%	-11.2%
Census Tract 98.02								
Actual proportions	0.0%	98.4%	1.6%	0.0%	3.3%	96.0%	0.0%	4.0%
Free market	56.3%	34.8%	4.2%	4.9%	47.1%	36.8%	8.1%	12.1%
Difference	-56.3%	63.6%	-2.6%	-4.9%	-43.8%	59.2%	-8.1%	-8.1%
Census Tract 98.03								
Actual proportions	3.5%	92.9%	0.6%	1.6%	0.0%	98.6%	0.0%	0.0%
Free market	56.7%	34.5%	4.1%	4.8%	46.0%	37.5%	8.3%	12.3%
Difference	-53.2%	58.3%	-3.5%	-3.2%	-46.0%	61.1%	-8.3%	-12.3%
Census Tract 98.04								
Actual proportions	0.8%	99.2%	0.0%	0.0%	2.2%	92.7%	0.9%	4.7%
Free market	56.3%	34.9%	4.2%	4.7%	49.5%	34.2%	7.9%	13.1%
Difference	-55.5%	64.3%	-4.2%	-4.7%	-47.3%	58.5%	-7.1%	-8.5%
Census Tract 98.06								
Actual proportions	0.5%	97.7%	0.8%	0.6%	0.0%	98.9%	0.0%	0.4%
Free market	54.6%	36.6%	4.2%	4.7%	47.0%	36.5%	7.8%	13.5%
Difference	-54.1%	61.1%	-3.4%	-4.1%	-47.0%	62.4%	-7.8%	-13.1%
Census Tract 98.07								
Actual proportions	1.4%	93.9%	1.4%	0.0%	1.6%	98.4%	0.0%	0.0%
Free market	59.8%	31.5%	4.1%	4.9%	50.1%	33.5%	8.2%	12.6%
Difference	-58.4%	62.4%	-2.8%	-4.9%	-48.5%	64.8%	-8.2%	-12.6%

Neighborhood Cluster 39 exhibits the same hyper-segregation as nearly all of the other neighborhood clusters south of the Anacostia River. Like these other neighborhood clusters, this intense a degree of housing segregation did not happen by accident.

#### Census Tracts Not Assigned to a Neighborhood Cluster

#### **Table 50: Census Tracts Not Assigned to a Neighborhood Cluster Free Market Analysis**

The 2006–2010 analysis of impediments included data on the census tracts shown in the table below. These tracts were not assigned to any neighborhood cluster. Census tract 55 was split into three block groups in 2000 and each was located in a different neighborhood cluster. Remember that in the 2006–2010 analysis of impediments, the estimates were grosser than in this study because it compared 2000 census *household* data to 2010 census *individual* data which was close to the household data, but not quite as precise as comparing *household* data from both 2000 and 2013–2017 as has been done in this analysis of impediments.

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## District of Columbia Racial and Ethnic Household Composition 2000 & 2013–2017

Census Tracts Not in a Cluster	2000 Census				2013–2017 ACS Estimates			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
<b>Census Tract 18.01</b>								
Actual proportions	100.0%	0.0%	0.0%	0.0%	Too few households to make reliable estimates			
Free market	69.9%	21.8%	4.4%	4.4%				
Difference	30.1%	-21.8%	-4.4%	-4.4%				
<b>Census Tract 20.01</b>								
Actual proportions	15.9%	70.3%	0.0%	14.8%	28.6%	53.8%	1.6%	19.5%
Free market	62.0%	29.5%	4.1%	4.6%	55.8%	28.5%	8.5%	11.5%
Difference	-46.1%	40.8%	-4.1%	10.2%	-27.2%	25.3%	-6.9%	8.0%
<b>Census Tract 23.02</b>								
Actual proportions	22.5%	69.4%	2.7%	3.2%	49.7%	39.9%	3.8%	4.3%
Free market	62.7%	28.7%	4.2%	4.7%	52.3%	31.8%	8.5%	11.5%
Difference	-40.2%	40.7%	-1.6%	-1.5%	-2.6%	8.2%	-4.7%	-7.2%
<b>Census Tract 55.00 (In 2013–2017 data by race were available only for the entire tract, not by block group.)</b>								
Actual proportions	In 2000, census data were available by block group and entered in the appropriate neighborhood clusters.				80.8%	2.5%	8.2%	11.7%
Free market					56.8%	27.7%	8.9%	10.5%
Difference					24.0%	-25.2%	-0.6%	1.2%
<b>Census Tract 73.01</b>								
Actual proportions	59.7%	32.8%	3.5%	7.0%	75.5%	20.1%	1.9%	14.3%
Free market	65.0%	26.4%	4.1%	4.9%	57.6%	26.5%	8.5%	12.0%
Difference	-5.3%	6.4%	-0.6%	2.1%	17.8%	-6.4%	-6.6%	2.3%
<b>Census Tract 73.08</b>								
Actual proportions	Zero households				0.2%	98.4%	0.0%	0.8%
Free market					47.5%	36.3%	7.8%	13.3%
Difference					-47.4%	62.2%	-7.8%	-12.5%
<b>Census Tract 98.08</b>								
Actual proportions	Zero households				0.1%	98.4%	0.0%	0.9%
Free market					47.3%	36.2%	7.8%	13.2%
Difference					-47.2%	62.2%	-7.8%	-12.3%
<b>Census Tracts 57.02, 62.02, 89.05, and 98.09</b>								
Actual proportions	There were either no households in these tracts or too few to produce reliable estimates.							
Free market								
Difference								

**Census Tract 18.01.** The Walter Reed Army Medical Center comprises most of tract 18.01 near the northern tip of the District. In 2000, 95.9 percent of the population lived in “other noninstitutional” quarters, not households. There were only 14 households in 2000 — but at least the decennial census reported household income and the race of the head of household. Unfortunately, there are too few households in the 2013–2017 five-year *estimates* of the *American Community Survey* to produce reliable estimates

**Census Tract 20.01.** Tract 20.01 has been more racially diverse than neighboring clusters 17 and 18 which surround it. Like clusters 17 and 18, in tract 20.01 the differences between the actual proportions of White and Black households and the proportions expected in a free market have shrunk since 2000. While the actual proportion of Hispanic households of any race has grown since 2000, so has the proportion expected in a housing market absent discrimination. The actual and expected proportions of Asians continue to be minimal.

**Census Tract 23.02.** Located in the city’s northeast quadrant, this tract is surrounded by neighborhood clusters 2, 3, 18, 19, and 21. The major land use in tract 23.02 is a group quarter, the Soldier’s Home. The actual proportions of both White and Black households — considerably different than the proportions expected in a free housing market in 2000 — are now what would be expected in a market absent housing discrimination.

**Census Tract 55.** In 2000, the decennial census provided data for each of the three block groups in tract 55. So the 2006–2010 analysis of impediments was able to include each block group in the neighborhood cluster in which it was located, in clusters 5 and 6. The tract has since been divided into five block groups. It was not possible to crosswalk the five block groups used in the 2013–2017 5-year estimates of the *American Community Survey* back to their three 2000 census counterparts. Consequently, data for all of tract 55 data are presented here. Looking at the data in neighborhood clusters 5 and 6 for the three block groups that comprised census tract 55 in 2000, it’s clear that the differences between actual and expected proportions of White and Black households have widened even further since 2000.

**Census Tract 73.01.** Bolling Air Force Base comprises tract 73.01. In 2000, the racial composition of the households in tract 73.01 was what would be expected in a free housing market without discrimination. By 2013–2017, the actual proportion of white households was nearly 18 percentage points greater than what would be expected in a free market. While the proportions of African American households expected in a free market were virtually identical in 2000 and 2013–2017, the actual proportions had fallen from 32.8 percent to 20.1 percent, 6.4 percentage points lower than expected. The actual proportion of Hispanic households of any race doubled while the expected proportion in a free market increased even more. The difference between the actual proportion of Asian households and the proportion expected in a free market widen since 2000.

**Census Tract 73.08.** In 2000, when all residents lived in group quarters, 85 percent were Black and 7 percent were White. There were no households in 2000. By 2013–2017 there were 641 households living in some of the most racially segregated housing in the America.

**Census Tract 98.09.** The demographics of tract 98.08 are nearly identical to those of tract 7308 —also among the most hyper-segregated housing in America.

**Census Tract 57.02.** This census tract is located just north of vacant tract 62.02 and south of neighborhood clusters 5 and 6. The population in tract 57.02 grew from zero in 2000 to 36 individuals in 2010. No households lived in this tract.

**Census Tract 62.02.** Located on the west side of the District, south of neighborhood clusters 5 and 6 and west of 8 and 9, this tract is almost entirely the open space of the Rock Creek Parkway. The population in tract 62.02 grew from 12 to 33 people over the past decade. No households lived in it.

**Census Tract 89.05.** The United States National Arboretum comprises nearly all of this census tract which is located on the District's east side between neighborhood clusters 23, 24, 25, 26, 29, 30, and 32. The population in tract 89.05 soared from two to 31 by 2010. There were no households.

**Census Tract 98.09.** Tract 98.09 is surrounded by the Bolling Air Force Base on the west, and neighborhood clusters 37, 38, and 39. From 2000 to 2010, the population in tract 98.09 declined from 723 to 664. In 2000, all residents lived in group quarters, nearly all of them in Saint Elizabeth's Hospital, the District's public psychiatric facility for individuals with serious and persistent mental illness who need intensive inpatient care. In 2000, 81 percent of the patients were African American; 15 percent were Caucasian. There were no households.

## Conclusions

The dual housing market with its accompanying racial and economic segregation dominates both ends of the housing spectrum in the District of Columbia. At one end is the market that serves everybody except African Americans. It's largely in the northwest quadrant — neighborhood clusters 10 through 15 — where the actual proportions of African American households are consistently much lower than the proportions that would be expected in a unitary housing market absent discrimination. The expected proportions of Black households expected in a free market ranges from 18 to 27 percent in these clusters. But the actual proportions of African American households ranges from 2.9 to 8.5 percent, most around four percent.

As noted in the analysis for neighborhood clusters 10 through 15, it is highly likely that these clusters are in the portion of a dual housing market that serves everybody except African American households including those that can afford to live there. Clearly household income is not excluding Black households from these neighborhood clusters.

At the other extreme are the neighborhood clusters that are still experiencing hypersegregation — segregation as severe as South African apartheid. The Anacostia River separates these neighborhood clusters — 28 through 39 — from the rest of the city. The actual proportions of white households are nearly immeasurable in some of these clusters even though you would expect the proportions of Caucasian households to be at least 43 percent *in every one* of these neighborhood clusters. There has been little movement from these extremes since the turn of the century.

In between the dual housing market of these extremes are neighborhood clusters that *appear* to be in a unitary housing market, albeit perhaps only temporarily. Broadly speaking, integrated housing in the District appears to be a unitary housing market that occurs during the early stages of gentrification. It seems to be consistently followed by the resurrection of a dual housing market that excludes African Americans from the housing market in these newly gentrified neighborhoods. These include neighborhood clusters 1 through 9 and 20, 21, 22, 23, 25, 26, and 27. In these neighborhood clusters, the differences between the actual and expected free market proportions of white and African American households have shrunk or disappeared ... *during gentrification*.

On the surface, the pro-integrative changes in actual proportions of white and African American households since the turn of the century suggest that these clusters are now served by a unitary housing market in which everybody participates. However, in some clusters like Neighborhood Cluster 8, there has been a massive decline in the actual proportion of Black households (from 61.7 percent in 2000 to 26.1 percent in 2013–2017) while the expected decline in a free market was less than seven percentage points (from 34.4 percent expected in 2000 to 27.9 percent in 2013–2017). It appears that the apparent unitary housing market and pro-integrative movement in such neighborhood clusters that are experiencing gentrification may be only transitory and that the clusters remain in a dual housing market where African Americans cannot participate.

Affirmatively furthering fair housing requires a vigorous effort to assure that these transformations to what looks like unitary housing markets isn't transitory — namely that the pro-integrative direction in which these neighborhood clusters have moved be maintained and resegregation to virtually all-white, all higher income neighborhoods be prevented.

Other factors may be at play. More than half of the District's African American households that moved did so for housing-related reasons, a higher percentage than any other group.<sup>335</sup> It is possible that better-off African American households are leaving the District to live in integrated Charles County or resegregating Prince George's County for the benefits of suburban living just like previous generations of Caucasian households have been doing since the end of World War II. Unfortunately, as explained earlier in this report, by restricting themselves to these two counties, these households will not fully enjoy the benefits of the America Dream and build the same levels of household wealth as they could living in a stable integrated neighborhood. Until households include a broader array of destinations, the segregated housing patterns created by government and real estate practices during the past 150 years will continue.

A jurisdiction seeking to affirmatively further fair housing cannot achieve housing integration overnight. The dynamics of the housing market simply do not work that way. Instead, mitigating housing segregation is a slow, incremental process. Not that many households move each year, especially homeowners. Given all the higher priority reasons households move to a particular home, it would be unrealistic to expect a large proportion of households would go out of their way to make a pro-integrative move.

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<sup>335</sup> David Ihrke, *Reason for Moving: 2012 to 2013 Population Characteristics* (Washington, DC: United States Census Bureau, June 2014) 4.

The concern, however, is that households (especially African American) that would like to move to higher opportunity areas do not include many high opportunity areas in their housing search due to the dominant dual housing market and its implicit or explicit housing discrimination.

There is nothing natural about the levels of segregation in the District and environs. The practices of the real estate industry and governments forced this segregation upon the nation decades ago. Both must be enlisted to undo the damage they have done.

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