Anti-Displacement Strategies

Prepared for City of Tacoma's Office of Strategy

University of Washington

Evans School of Public Policy and Governance

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Positionality Statement

Our team recognizes that as researchers and authors of this capstone report, our individual backgrounds and experiences shape our perspectives on the literature, interviews, and policy analysis presented in this report. As public administration graduate students, we acknowledge the privileges associated with higher education. While we have not personally experienced displacement pressures, we made efforts to minimize biases, continuously reflect on our power and privilege, and maintain focus on the report's purpose of enhancing policies and systems that affect individuals dealing with housing challenges.

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Executive Summary

This project provides a comprehensive analysis of two anti-displacement policies (preservation ordinances and community prioritization), as well as an examination of how to measure displacement. By critically evaluating the strengths and limitations of these initiatives, our team distilled best practices for mitigating displacement pressures in Tacoma's local context and developed recommendations on how to measure displacement in the present and future. Ultimately, this paper addresses the following research question:

In light of other cities' anti-displacement initiatives, how can the City of Tacoma implement its chosen policies most effectively and measure their impact in the future?

Findings

After analyzing our interview transcripts and case study findings, several common themes emerged regarding the implementation of anti-displacement policies. These included:

- ❖ **Community:** Listen to Community Voices and Incorporate Feedback
- ❖ **Suitability:** Tailor Policies to Local Context
- ❖ **Housing Market Conditions:** Current Supply and Cost of Housing Matter for Success

Findings relevant to each specific initiative are as follows:

Preservation Policies

- ❖ **Tenant opportunity to purchase acts (TOPA) and Right of First Refusal (ROFR) are among the most common and well established preservation policies in the United States:** Some of the most notable programs are Washington D.C.'s TOPA law and Montgomery County Maryland's Right of First Refusal Law.
- ❖ **Preservation Policies are accomplished through multiple streams of funding:** Every case study observed in the capstone had devoted funds for housing preservation to some extent. Localities also utilized federal and state housing preservation related grants and subsidies. In general, housing preservation for government agencies and nonprofit developers are high impact and low cost as much of the expense is paid by the housing developer.
- ❖ **The financial and staffing resources you allocate to housing preservation directly impact the number of affordable housing units that can be maintained:** In short, our case studies showed that localities with more staff, a network of community partners, and

generous funding through a housing preservation fund tended to accomplish more affordable housing preservation projects. In our case studies, we found that cities need at least 2-5 FTEs to accomplish programs like Tenant Opportunity to Purchase Acts and Right of First Refusal and expertise from a lawyer with subject matter expertise.

❖ **Every preservation policy requires technical assistance from community based organizations and land trusts:** Community based organizations and partners can help with education, communication, tenant organizing, legal advice for tenant groups, and qualified organizations (see appendix 12) can help with acquisition of affordable housing buildings.

Community Prioritization

❖ **Two Primary Strategies:** Localities implement community prioritization either as a mandated program that applies to all affordable units, or as a voluntary, project-based program.

❖ **The Importance of Community Involvement:** Input from members of the community is critical to addressing context-specific anti-displacement needs, and in many cases drove the overall development and implementation of community prioritization policies.

❖ **Impact of Transit Projects and Economic Growth:** The two main catalysts for community prioritization policies are the development of major infrastructure projects that physically disrupt housing markets and rapid economic growth within localities which escalates housing prices.

❖ **Coordination is Required Between Agencies:** There must be clarity about which organizations implement community prioritization policies at what stages, and lack of interference from other levels of government (such as state and federal agencies) is necessary for proper implementation.

❖ **Maintaining Legality:** Remaining within Fair Housing Act (FHA) and Affirmatively Furthering Fair Housing (AFFH) guidelines is necessary for stable implementation, but possible and modeled by several localities.

❖ **Potentially Minimal Resource Strain:** While many jurisdictions operate community prioritization programs that are resource intensive, a voluntary program is administratively simple and low-cost to implement.

❖ **Existing Housing Market Matters:** The success of any community prioritization policy is subject to the overall availability of affordable units and pipeline of future affordable developments.

Measuring Displacement

Consistent with the literature in the field, we found that quantitative methods of measuring displacement are rarely utilized due to constraints in acquiring data that accurately measures the phenomenon of displacement. Instead, most jurisdictions and agencies interested in

tracking neighborhood change measure gentrification as a proxy for displacement. Our top findings include:

- ❖ **Measure with caution:** Measuring displacement and/or gentrification can be a useful tool for identifying high-needs areas to implement housing policies. However, trying to use measurement tools to predict future displacement could lead to speculative investment from real estate actors, potentially exacerbating the problem artificially. If using measurement tools to make future predictions, care should be taken to ensure that few hard numbers are attached to predictions to avoid potential speculation.
- ❖ **"Truth-grounding" in qualitative data:** Attempting to measure displacement with only quantitative data will never accurately capture the effects or extent of displacement. When possible, gathering stories and concerns directly from target communities will greatly enhance the understanding of displacement in the city.
- ❖ **Indicators:** Focus on college education, changes in home price, and changes in rental prices as indicators of potential displacement pressures. Currently, the Federal Reserve Index captures these variables and, based on interviewee suggestion, could be used by any jurisdiction to attempt to measure where displacement pressure may occur.
- ❖ **Sources of Data:** Local data intermediaries (see Glossary) may be better equipped to acquire and process both quantitative and qualitative data necessary for displacement measurement. Additionally, interactive mapping can be an effective tool for efficiently gathering qualitative and/or quantitative data directly from the communities affected.

The City of Tacoma's current Equity Index includes some indicators relevant for measuring displacement pressures (ex: cost-burden, home values) but could benefit from additional data. The methodology behind the Equity Index is on par with current national standards. To improve upon this baseline measurement, the City will need to establish ways of acquiring additional sources of data, as outlined in our recommendations.

Recommendations

Preservation Policies

- ❖ Use stakeholder mapping and community engagement to see whether affordable housing partners, community organizations, land developers, and the Tacoma Housing Authority have the capacity and technical expertise to accomplish preservation ordinances, TOPA, COPA, and ROFR.
- ❖ Seek funding from the state and federal government.
- ❖ Think intentionally about the preservation program timeline. Since you are competing within the real estate market, it's important to have a timeline that is fast enough to start and secure a preservation project while also giving the involved groups enough time to

secure financing. We recommend 30-60 days for negotiation and 180 days for the closing process for a smooth transaction.

❖ Tailor the preservation approach to the type (unit type, affordability level, etc.) of affordable housing Tacoma needs and choose one preservation policy (Right of First Refusal, Tenant Opportunity to Purchase Acts, Community Opportunity to Purchase Acts, Preservation Ordinance).

❖ Create a strong and clear communication plan to combat misinformation. A number of unsuccessful instances of Tenant Opportunity to Purchase Acts and Right of First Refusal Laws in the United States have occurred due to landlord opposition and misinformation about preservation programs.

Community Prioritization Policy

❖ Use an opt-in policy that applies prioritization on a project-by-project basis.
❖ Encourage developers to fully align community prioritization policy with affirmative marketing.
❖ Allow for flexibility in documentation used to fulfill prioritization criteria.
❖ Set aside 50% of units per housing development for community prioritization.

Measuring Displacement

❖ Begin community stakeholder mapping to identify potential data intermediaries and partners.
❖ Establish data sharing agreements with local community-based organizations.
❖ Perform an audit of existing administrative data sources.
❖ Create and maintain a continuous indicators tracking system (or update existing indexes with displacement relevant indicators).
❖ Conduct community surveys of recent residential moves.
❖ Create a one-stop site for providing information about and encouraging feedback on displacement within the city.

CHAPTER 1: Introduction

1.1 Organizational Background

The City of Tacoma established the Office of Strategy, embedded within the City Manager's Office, in 2023. Born out of the City's 2023-2024 budgeting process and with collaboration as a key value, the Office of Strategy's primary responsibility is leading the implementation of the City's strategic plan, Tacoma 2025, and other cross-departmental strategic initiatives, such as the Affordable Housing Action Strategy (AHAS). The Office of Strategy is committed to incorporating anti-displacement policies into the AHAS to address the negative impacts of gentrification on low-income and BIPOC (Black, Indigenous, and People of Color) residents in Tacoma's neighborhoods. The Office of Strategy collaborates with internal departments such as Tacoma's Housing Division, the Community and Economic Development Department (CED), the Planning and Development Services Department (PDS), the Office of Equity and Human Rights (OEHR), the Neighborhood and Community Services Department (NCS) to address affordable housing and anti-displacement policy issues. External partners that work independently from the City but collaborate often are organizations like the Tacoma Housing Authority, non-profits, community partners, and land developers (see appendix 2). Much of this work is achieved through close collaboration with residents, partner organizations, and City departments, ensuring alignment and success.

Our capstone project began in January 2024 and we finished collecting data in early April 2024. At the February 6, 2024 City Council meeting the Tacoma City Council affirmed and adopted Tacoma's Anti Displacement Strategy which approved 21 policies and programs to mitigate and prevent displacement of Tacoma residents from their homes. The 51 page report has four main AHAS objectives: "create more homes for more people", "keep housing affordable and in good repair", "help people stay in their homes and communities", and "reduce barriers for those who experience them" (City of Tacoma).

1.2 Project Overview

Over the past few decades, the City of Tacoma has been witnessing an increase in displacement of longtime residents. To understand the process and effects of displacement, one must also understand gentrification. Gentrification and displacement are closely related but distinct processes - one can occur in the absence of the other. Gentrification creates displacement pressures and thus is often the predecessor to displacement occurring. Despite this, gentrification can occur without displacement following, and vice versa. In some cases, displacement may even precede gentrification.

Many jurisdictions interested in studying and mitigating ill-effects of either process do not make distinctions between the two. For the purpose of this paper, we will consider the following definitions of gentrification and displacement as standard:

Gentrification: "*Gentrification is a pattern of neighborhood change in which a previously low-income neighborhood experiences reinvestment and revitalization, accompanied by increasing home values and/or rents (Reardon et al., 2014).***"**
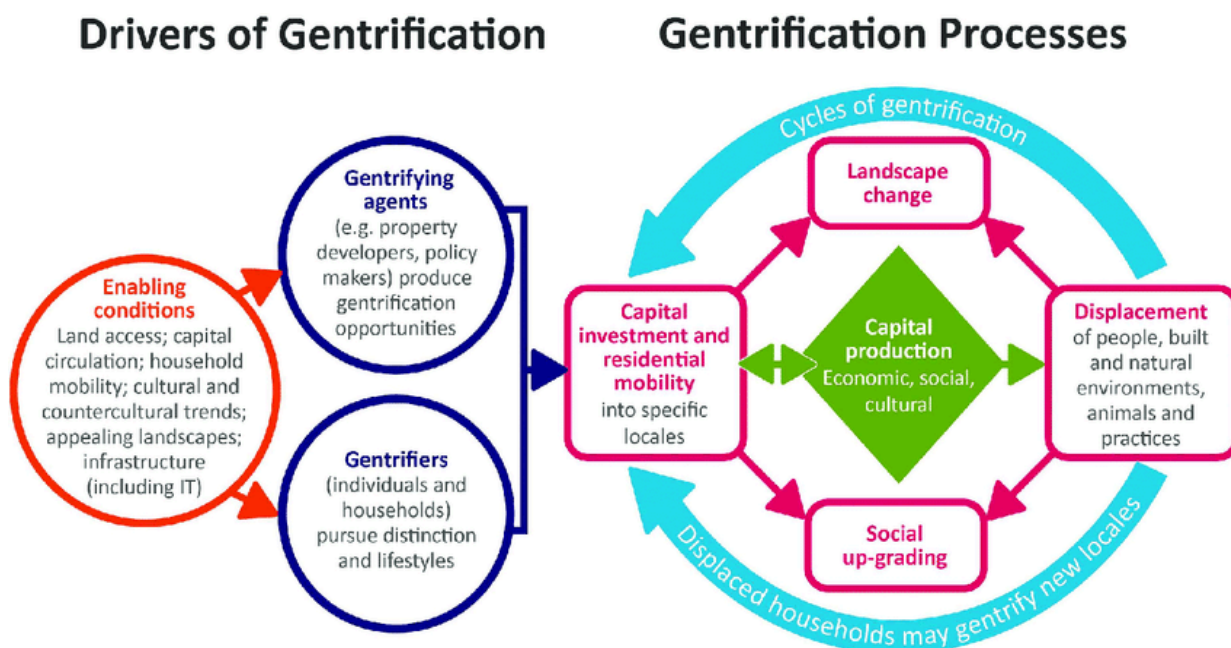
Figure 1: (Sutherland, 2018)

The gentrification process, "in popular conceptualization," has been perceived as affecting low-income and BIPOC communities, aggravating social and economic imbalances within jurisdictions, thus leading to the term's bad reputation (Kirkland, 2008). The process can take anywhere from months to years or even decades, although years is typically an appropriate time frame to analyze the process. There have been mixed findings on the impacts of gentrification, but recent studies have demonstrated racially disparate outcomes in gentrifying neighborhoods (Hwang & Ding, 2020). In light of all of this, it is important to state gentrification itself is a neutral process that can have good or bad outcomes depending on who benefits from the ensuing revitalization. In his book "The Color of Law, " author Richard Rothstein notes:

"Gentrification would be a positive development if it were combined with inclusionary zoning policies to preserve affordable housing in every neighborhood. But such policies are rare or weak. Inclusionary zoning should also be required of presently exclusionary suburbs. Were that to happen, all neighborhoods could make progress toward integration."

Our team acknowledges that the anti-displacement policies being developed and implemented by the Office of Strategy specifically aim to rectify the potential negative impacts of gentrification. As Rothstein argues, if long term residents, specifically low-income and BIPOC residents, are not displaced due to gentrification, there is an opportunity for those residents to enjoy the influx of resources into their communities. For the purpose of our research, avoiding using the term gentrification would be a disservice, as gentrification processes are closely entwined with displacement joint processes. We chose the above definition from Reardon because it comes closest to describing the process of gentrification with little bias.

A simple explanation of displacement is as follows:

Displacement: *"A pattern of change in which current residents are involuntarily forced to relocate, either because they cannot afford to stay in the neighborhood (Reardon et al., 2014) or because of other socioeconomic or environmental pressures making continued residence in the neighborhood infeasible or undesirable (Cohen, 2017)."*

Experts from BERK Consulting, Inc. have identified four forms of displacement:

- "***Direct economic displacement*** occurs when residents can no longer afford to live in an area due to rent increases"

- "***Indirect economic displacement*** results from existing residents moving out but comparable households not being able to move back in"

- "***Cultural displacement*** occurs when the social and cultural connections within an area have declined due to people leaving a neighborhood, and others seek to move elsewhere as a result."

- "***Physical displacement*** can occur through the loss of the actual housing units people are living in from the rehabilitation, redevelopment, or demolition of these properties."

(BERK Consulting, Inc., 2020)

In the City of Tacoma, the neighborhood with residents at the highest risk of displacement is the Hilltop. The Hilltop can trace its roots as a historically Black neighborhood all the way back to the late 1800s. During the 19th century George P. Riley, a Black pioneer, established the Workingmen's Joint Stock Association (WSJA) (Lowe, 2018). The WSJA subsequently purchased a 67-acre tract in Tacoma called the Alliance Addition in 1869. This area became a haven for many working class and immigrant residents in the region, and encompasses the neighborhood we now call the Hilltop. The Hilltop became a largely Black neighborhood during the mid-20th century due to redlining policies (Gallup, 2022). Like many formerly redlined neighborhoods, the Hilltop community is now struggling with the impact of gentrification and strong forces of displacement facing BIPOC residents who have long resided

in the area. While the Hilltop is of central concern, it should be noted that parts of South and East Tacoma are experiencing similar challenges (Long, 2020).

Due to the urgent and increasing displacement crisis in the City of Tacoma, the Office of Strategy is committed to implementing anti-displacement programs and policies to preserve and promote diversity of the neighborhoods in Tacoma. Our research focuses on procedures we recommend the Office of Strategy use to implement its anti-displacement policies effectively.

1.3 Project Tasks

The Office of Strategy asked us to investigate three components of Tacoma's anti-displacement strategy: **Preservation Policies**, **Community Prioritization Policies**, and **Measuring Displacement**. These components align with the City of Tacoma's desired next steps in pursuing anti-displacement work according to the City's Anti-Displacement Strategy. Below we will briefly define the components and strategies in these three main categories.
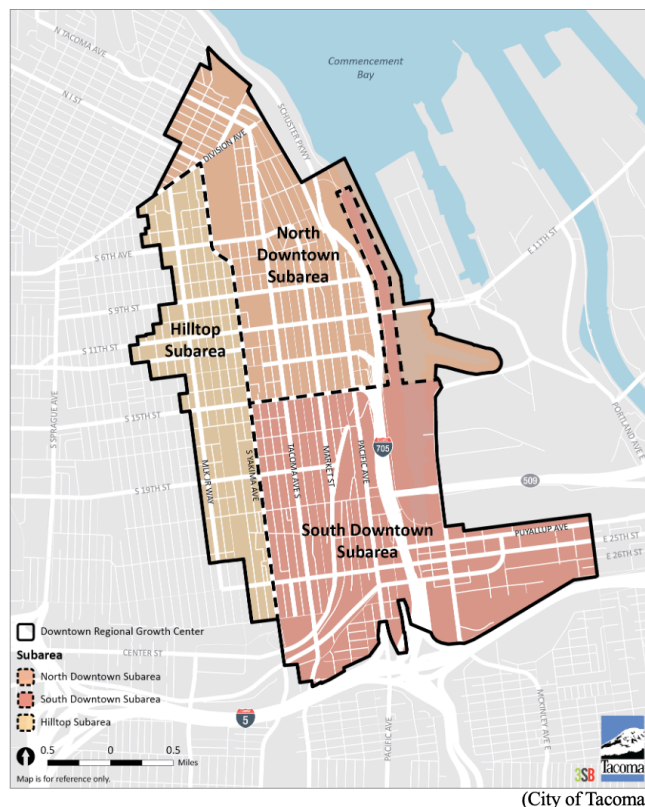
(City of Tacoma)

Figure 2 (Source: City of Tacoma)

1.3.1 Preservation Policies

Preservation policies is an overarching term used to describe purchase avenues for tenants, localities, and community based organizations. With the permission of the client, this research has expanded to also look at Tenant Opportunity to Purchase Acts (TOPA), Community Opportunity to Purchase Acts (COPA), Right of First Refusal (ROFR), and Preservation Ordinances. The aforementioned policies are all programs to buy old buildings (each locality has its own definition of 'old', many localities consider buildings built before the 1990s within its preservation purview) and maintain housing stock. In the City of Tacoma's case, we are looking for preservation policies to be used to preserve multifamily affordable housing buildings and units. Historic preservation and preservation policies like the TOPA, COPA, ROFR, and preservation ordinances are different where historic preservation tends to have stricter requirements than preservation policies.

Right of First Refusal

Right of first refusal (ROFR) policies can be used in two different contexts to preserve the stock of rental housing. First, they can help maintain the ongoing affordability of dedicated affordable rental housing by prioritizing the consideration of mission-oriented buyers when the owner of a subsidized rental property decides to stop participating in a subsidy program. Second, they can be applied to existing unsubsidized multifamily rental properties, helping to preserve the availability of rental units and, in some cases, facilitating conversion to dedicated affordable rentals.

Some ROFR policies require the property's seller to give notice to the local jurisdiction of their intent to sell. After the jurisdiction receives the notice, specific entities dedicated to building affordable housing would have a set amount of time in which they would be able to purchase the building at market rate before it goes on the open market. The jurisdiction would need to determine the period of time organizations would have to decide whether to purchase the building, the specific organizations that would be allowed to make such a purchase, and the process to determine the market rate sales price. This can be determined by the seller or by a third-party appraiser. In other localities, the ROFR is applied to groups like the city, the county, housing authorities, community organizations, and/or tenants. All groups are given the right to assign (see glossary). The ROFR is a streamlined process that can be used to preserve multifamily affordable housing but gives decision making power to (usually) government agencies over private market buyers. A right of first refusal provides to an organization the guarantee of an opportunity to purchase a property as long as they follow the requirements of the law. See chapter 3.2.1's findings on Montgomery County Maryland's right of first refusal policy for more information.

Opportunity to Purchase Acts

Tenant Opportunity to Purchase Acts

The Tenant Opportunity to Purchase Act (TOPA) is a policy that allows existing tenants to purchase a multi-unit building at market price before it is sold to anyone else. This gives tenants the opportunity to convert the units to condos or a cooperative. Thus, TOPA can be used specifically to preserve multifamily housing stock. In some instances TOPA is used for affordable housing and in others it favors market rate condos.

When a building is planned to be sold, tenants already living in the building can be included in a designated entity eligible to purchase the property in a right of first refusal policy. Tenants often work with a third-party developer to manage the property and make necessary repairs. As real estate transactions can be complex, tenant groups may require significant financial assistance to be successful in purchasing the building. Tenants and residents can also

choose to waive their TOPA rights and sell it to an external bidder. This means that the head of household, resident council, or tenant union can decide which organization or developer will take over the building and become their new landlord. See chapter 3.2.1's findings on Washington D.C.'s tenant opportunity to purchase act

Community Opportunity to Purchase Acts

Community Opportunity to Purchase Acts (COPA) work in a similar way to TOPA. The main difference is that instead of offering the right of first refusal to a tenant group, it is offered to non-profit organizations, community land trusts, and community organizations designated by the city or locality administering the program.

City/District/Locality Opportunity to Purchase Acts

Similarly to TOPA and COPA, District Opportunity to Purchase Acts (DOPA) give cities the right to purchase the property first before it is sold to someone else.

The ROFR and opportunity to purchase acts are interrelated but they have distinct differences:

A purchase option granted to the organization may be a possibility. The purchase option is triggered at a specific time and at a specific, or ascertainable, price (often, fair value established by a future appraisal because the time for exercise of the option is likely far in the future). (We Conserve PA)

The right of first refusal is triggered just before the property is to be sold to a third party and is guaranteed. The purchase price is firm (the same price offered by the third party) but the right to purchase must be exercised quickly by the organization without any time for negotiation. (We Conserve PA).

Preservation Ordinances

The preservation ordinance is a legal framework that exists to protect and preserve historic and cultural buildings essential to the neighborhoods. This is an important part of community development because it reflects and encourages the cultural and historic identity of the neighborhood and preserved buildings. The provisions of the ordinance would include:

- Property owners of rental buildings that have received local, state, or federal subsidies and intend to opt out of their contract or other affordability restrictions, refinance, or sell their property would have to give notice of their intent to sell to both the City of Tacoma and their tenants within a specified period of time. Failure to comply with this requirement would result in significant financial penalties.
- Property owners of privately owned buildings that meet specific criteria, such as being close to transit, located in high-displacement neighborhoods, having an expiring

affordability covenant, or being of a certain age or size, would also have to notify the City of Tacoma within a set period of time.
- The City of Tacoma would track eligible properties based on predetermined criteria.

A preservation ordinance can be enacted as a standalone policy, or combined with other policies, including a right of first refusal policy, TOPA, or a preservation fund. A preservation ordinance is often presented as a policy package (for more information about preservation ordinances packages see the Chicago's preservation ordinance case study in chapter 3).

Housing Preservation Funds

Housing preservation funds help to ensure affordable housing is protected from conversion into market-rate units by providing jurisdictions and community partners with consistent funding. Funding empowers public and mission-driven organizations to intervene and stabilize subsidized or affordable multifamily properties quickly. A dedicated preservation fund that cities and their partners can use to acquire properties, extend affordability periods, and provide low-interest financing for property improvements while maintaining affordable rents can be effective housing solutions. By creating this fund, any Preservation Ordinance, ROFR policy, and TOPA will be strengthened, as mission-driven organizations will be better equipped to purchase and preserve affordable buildings.

1.3.2 Community Prioritization Policies

Community prioritization policies will help the City of Tacoma to prioritize housing assistance and allocate resources for residents at risk of displacement and gentrification. These policies prioritize applications for subsidized housing or down-payment assistance for households that have been previously displaced from a specific community due to direct factors, such as demolition of their residence for infrastructure projects, or indirect factors, such as economic pressures resulting in unaffordable rents or home prices. By giving preference to long-standing community members in subsidized housing or down-payment assistance programs, prioritization policies aim to mitigate the impact of gentrification and ensure housing stability for vulnerable populations.

1.3.3 Measuring Displacement

There is no specific policy to pursue regarding measuring displacement, although measuring displacement is an implicit goal in many related policies. Municipalities are often interested in measuring the effectiveness of their housing and social policies, and as a result, gentrification and displacement measurement become one of many tools used to evaluate effectiveness of the policies listed above. Standalone measurement tools not embedded in specific policies typically take the form of Equity Indices, such as the City of Tacoma's Equity Index. These are generally more broad measures that don't directly measure displacement.

CHAPTER 2: Research Methods

2.1 Overview

Our research addresses the following overarching question:

In light of other cities' anti-displacement initiatives, how can the City of Tacoma implement its chosen policies most effectively and measure their impact in the future?

Our report offers informed recommendations on best practices grounded in qualitative analyses. To accomplish this, we performed a comprehensive landscape analysis of programs from other cities, counties, and academic institutions using established text analysis techniques. Additionally, we interviewed government officials, non-profit staff, and academics actively engaged in anti-displacement initiatives.

Text resources include:

- Government reports

- Academic literature on anti-displacement strategies and measurement

- Internal governmental documents detailing specific anti-displacement policies

Our team conducted program practitioner and academic interviews via Zoom and Teams from mid-February to early April 2024, which is a span of eight weeks. We used specific criteria to evaluate the policies and ordinances of certain cities. We conducted 10 interviews in which we interviewed 13 program practitioners and academics. The interviews were split amongst our three topics accordingly: three interviews for prioritization, three interviews for preservation, and three interviews specifically about measuring displacement, and one general interview about anti-displacement in the Puget Sound Region. There were 10 other key contacts that we reached out to that either did not respond to our interview request or the interview did not fit into our timeline (see appendix 5).

The most relevant community prioritization policies are from cities in the Ninth District Court of Appeals. A community prioritization policy could prompt discussion of compliance with fair housing laws and Housing and Urban Development (HUD) funding rules. By seeking out cities within the Ninth District and along the West Coast, we are likely identifying jurisdictions that have zoning and code enforcement laws similar to those in Tacoma.

We searched for across programs that implement preservation ordinances, tenant opportunity to purchase acts, community opportunity to purchase acts, and right of first refusal

policies. Another important variable we considered is the amount of resources a city has to dedicate to a preservation ordinance, both monetary and staff resources.

When measuring displacement, we also sought comparable cities in size and resources. However, we ultimately interviewed staff from nonprofits and universities in larger cities due to time constraints, and found few "comparable" cities implementing defined measurement tools. For measuring displacement, our most important research questions revolved around the type of measurement used, the rationale behind choosing it, and the resources required to implement the measure.

Once the interviews were completed, our team carefully examined the transcripts, and conducted content analysis via interview coding. The primary objective was to identify any indicators that suggest whether the program (preservation ordinance or community prioritization) has been effective in reducing displacement and gentrification in a particular neighborhood or city. We examined what initial resources were needed to make the program successful or unsuccessful, what implementation steps were taken to bring the policy to light, and what preconditions helped or harmed the program.

2.2 Literature Review Methods and Overview

Our research focuses on strategies the City of Tacoma can utilize to implement its anti-displacement policies (preservation ordinances; prioritization policies) effectively, as well as ways of measuring displacement. To contextualize our research within the field of anti-displacement work, we conducted a literature review of policy papers, relevant program documentation, and academic sources.

2.3 Interview Design

We used a semi-structured interview process because our research question is largely exploratory. Interviews result in data with lower external validity than a survey, but a high level of content validity. We wanted to elicit answers describing the complete knowledge of our interviewees, which required a method suited for complex topics. Thorough responses to open-ended questions helped our team identify common themes in the implementation process of anti-displacement policies. Many of these open-ended questions were followed by funneling questions, providing our team with the specific details needed to create tailored recommendations for Tacoma's Office of Strategy. A semi-structured interview also permitted adjustment based on which specific policies our interviewees are most well-versed in, and gave us flexibility to ad-lib any questions that arose during the course of the interview.

2.3.1 Sampling Strategy

Our sampling frame was academics and practitioners we identified as conducting work relevant to anti-displacement strategies, either explicitly or implicitly. We employed a convenience strategy, beginning with cold emails to academics identified as experts in the area of anti-displacement strategies. This served as our initial sample, and we conducted interviews with all of the affirmative respondents to our cold emails. At the end of interviews resulting from convenience sampling, we then employed a snowball sampling strategy by requesting referrals to other potential interviewees, which at the end of our list of interview questions (see Appendix 1). Snowballing helped us to identify more interviewees within our niche sampling frame, many of whom aren't well known to the public. It also aided us in quickly broadening our pool of potential interviewees during the brief time frame of our project.

2.4 Case Studies

To supplement our interview findings, our team also analyzed several cities with policies relevant to anti-displacement. The case studies and subsequent analysis are included in chapters 3 and 5 of our report.

2.5 Limitations

We attempted to review numerous preservation policies but needed more time to interview the relevant policy practitioners. We conducted three interviews pertaining to the tenant's opportunity to purchase act, right of first refusal, and notice of intent to sell. It is important to note that many cities that engage in preservation work are located on the East Coast and may have different real estate markets with different needs than Tacoma. If we had more time, we would have liked to speak with someone from San Francisco's Community Opportunity to Purchase Act program and Mission Promise, a key stakeholder in San Francisco's COPA program. In addition, we would also try to interview a representative from the City of Chicago's Office of Housing to learn more about its tenant opportunity to purchase act (TOPA) pilot program in 2021 and its updated single room occupancy preservation ordinance.

Our team interviewed three community prioritization policy practitioners, two from the City of Portland and one for the City of Seattle. Other interview participants had some knowledge of community prioritization policies, but did not directly work with their implementation. Ultimately, we would have wanted to interview Dr. Lisa Bates from Portland State University, who is a leading expert on Portland's N/NE Preference Policy, but we were unable to schedule an interview. Similarly, we would have desired interviewing city officials from San Francisco and New York City who could have spoken to the legal issues facing their respective community prioritization programs.

For the displacement measuring aspect of the project, we were limited in our ability to secure relevant interviews. In total, we were only able to conduct three interviews due to time constraints and people not responding to our interview requests. However, all three interviews provided very similar information, and supplemented with papers by the people we could not interview and case studies from various cities, we believe our analysis is substantial. We also attempted to find information about migration patterns and smart city movements after discovering their relevance to measuring displacement. However, we were limited in being able to secure interviews related to these topics, and thus these topics make up a smaller portion of our report.

CHAPTER 3: Preservation Policies

The literature review on preservation policies provided below is based on the research provided by our client. The primary sources of information are the Center for Urban and Regional Affairs (CURA) Blue Line Extension Anti-Displacement Initiative of the University of Minneapolis, UC Berkeley's extensive research on the Urban Displacement Project, and the Coalition of Nonprofit Housing and Community Development whose work is based in Washington D.C.. Furthermore, research work and materials produced by organizations outside conventional commercial or academic publishing and distribution channels are also included. The gray literature, such as official agency reports, policies, charters, city websites, and other online resources, are cited as secondary sources. Preservation policies, such as the Tenant Opportunity to Purchase Act (TOPA), Community Opportunity to Purchase Act (COPA), District Opportunity to Purchase Act (DOPA), and Right of First Refusal, can be complex to grasp without the right context and connection to a city, county, or municipality. To bridge this gap, our literature review and findings sections present practical case studies from diverse regions of the United States. These studies illuminate the specifics of these preservation policies, implementation steps, program strengths, weaknesses, and most importantly, the invaluable lessons learned.

3.1 Literature Review

Existing literature shows that many U.S. cities have implemented preservation policies to combat gentrification and displacement. However, these programs vary significantly in terms of the entities purchasing the buildings, the stakeholders involved, and whether tenants pay fair market value or receive subsidized housing. In our research, we delve into multi-family housing preservation policies, a topic of utmost relevance to researchers, policymakers, and community organizations interested in affordable housing preservation policies, with the aim of revitalizing affordable housing units in a specific city. The following are cities that we did not reach in the interview process but have encountered in our literature review.

The Tenant Opportunity to Purchase Act (TOPA) is a law in Washington, D.C., which is aimed at protecting tenants residing in multi-family residential buildings. The law mandates the sellers to notify the tenant associations when the building is put up for sale and offers the tenants the first right to purchase it before it is sold to anyone else. The tenants also have the right to sell their purchase rights to third-party landlords or assign them to groups with similar interests. Nonprofits can also be assigned these rights to help tenants manage the building. TOPA rights allow tenants to negotiate with incoming landlords for repairs and more affordable living conditions. However, it can be difficult for tenants to purchase a building using TOPA rights due to the high purchase cost and limited access to housing grants. Smaller apartment buildings may

find it more challenging to navigate the TOPA process. Housing cooperatives can be an alternative solution for those who find TOPA too complicated. It is important to note that a tenant association needs a lawyer to take advantage of their TOPA rights, and smaller apartment buildings need more access to housing grants because they have less pooled money. The online literature around the opportunity to purchase acts is often negative and heavily weighs program effectiveness (see Chapter 4.1.1 for more specific information about D.C.'s TOPA law).

Prince George's County in Maryland has introduced a Right of First Refusal Program intending to increase the availability of affordable housing. Under this program, if a building has 20 or more units, the owner must notify the county of their intention to sell once they have a "bona fide contract of sale" with a potential buyer. Within seven days of notification, the county evaluates the building to determine whether it will exercise its right of first refusal. The county aims to preserve existing affordable housing and expand the pool of available affordable housing. To achieve this, the department assesses the property's location and the rental income it generates to determine the income level of tenants who live in the building. If the department decides to move forward, it must find a pre-qualified third-party designee interested in purchasing the property. These designees in Prince George's County include qualified nonprofits and for-profit developers. The county then notifies the seller and the third-party designee to proceed with the sale. The two parties have over two weeks to coordinate the purchase. The county does not guarantee financial help or incentives, but it may consider assisting potential designees who are serious about purchasing the property. Prince George's County recently launched a gap financing fund using money from the American Recovery Act and the state of Maryland.

3.2 Findings

The importance of maintaining multifamily buildings as affordable housing has long been a key concern in housing policy, dating back to the 1980s. In recent times, this issue has garnered even greater attention. Furthermore, several preservation ordinances, opportunity to purchase acts, and right of first refusal laws have been implemented in different regions of the nation to further bolster this effort.

Several other cities have Right of First Refusal (ROFR) programs, such as Richmond, CA, which is specified for historic homes; Santa Monica, CA, which is specifically for the Santa Monica Mountains Conservancy; and West Hollywood, CA, which applies to rental housing. New York City, NY, also has an ROFR program, and there is a program in New York State that applies specifically to manufactured home parks. Portland, OR, has a similar program, but it is more difficult to find public information about it. Each of these programs are underutilized because of budget constraints. Moreover, Colorado; Oakland, CA; Richmond, CA; and Minnesota are currently considering passing ROFR or Tenant Opportunity to Purchase Acts (TOPA).

Preservation Policies (ROFR, OTP, PO) in other jurisdictions

Jurisdiction	Policy Name	Year Enacted	Housing Type	Right to Exercise	Affordability Restrictions	Right to Assign	Timeline
Baltimore, MD	ROFR	1979	1 unit	Tenants	No	Unknown	30-day negotiation, 60-day closing (90 days if using a local state or federal program to assist)
Washington D.C.	TOPA	1980	1, 2-4, 5+ units	Tenants	No	Yes	Outlined in case study
Montgomery County, MD	ROFR	1981	4+ units	Tenants, HOC, and County	Yes	Unknown	Outlined in case study
Takoma Park, MD	TOPA	1986	1, 2-6, 7+ units	Tenants	No	Yes	Registration of Interest in 45 days. Due diligence materials within 7 days. 120-day negotiation period. 120 (or 18- for limited equity co-ops) days for closing.
New Hampshire	RTP	1988	Manufactured Homes	Tenants	No	No	60-day negotiation
Minnesota	RTP	1991	Manufactured Homes	Tenants	No	No	Owner must provide due diligence materials 45-day negotiation
Washington D.C.	DOPA	2008; regulations issued 2018	5 + units	Qualified Developer	Yes	Yes, to a qualified Developer	30-day registration of interests. 7 days for due diligence materials 150-day negotiation +15 if tenant is registered for TOPA. 60 days to close +120 w/TOPA
Prince George County, MD	ROFR	2013	20 + units	County	No	Yes	7-day registration of interest owners must provide with an offer of sale within 5 days of signing third-party contract, 60-day negotiation, 180 days to close
Chicago, IL	PO	2014	Single room occupancy	Qualified Developer	Yes	No	180-day negotiation. 365 days closing w/ mutual agreement
San Francisco, CA	COPA	2019	3 + units	Qualified Non-Profit	Yes	No	Outlined in case study
Seattle, WA	Notice of Intent to Sell	2019	1, 2, 3+ units	City, Housing Authority, & Community Partners	Yes	Unknown	At least 90 days' notice prior to listing. If the owner has not received a notice of interest from the City, SHA, tenant, or tenant group within 15 days (2–4-unit building) or 30 days (5 or more units) of providing notice, the owner is welcome to list the property and/or accept an offer from any party.
Berkeley, CA	TOPA	Current legislation	2+ units	Tenants and Qualified Organizations	Yes	Yes, to a qualified organization	20-45 days for registration of interest, 10–120-day negotiation period, and 30-120 days to close.
Los Angeles, CA	TOPA and COPA	Current legislation		Tenants and mission driven nonprofits	Yes	Unknown	1 month to make the first offer, and between 1-4 months to secure financing, depending on the size of the building. The landlord can reject the offer, but a renter or qualified nonprofit would have 10 days to match it.

Table 1: Preservation policies in other jurisdictions (CNHED)

Policy Name: Right of First Refusal (ROFR), Tenant Opportunity to Purchase Act (TOPA), Right to Purchase (RTP), District Opportunity to Purchase Act (DOPA), Preservation Ordinance (PO), Community Opportunity to Purchase Act (COPA).

Affordability Restrictions: Not every preservation policy mentioned in this chart has the primary goal of preserving affordable housing. For example, Takoma Park and New Hampshire's right to purchase programs had the primary goal of empowering tenants and therefore did not have affordability restrictions. The columns that answered "yes" were affordable housing buildings that served a population that was below a certain AMI threshold that varied jurisdiction to jurisdiction.

3.2.1 Relevant Preservation Ordinance, Opportunity to Purchase, and Right of First Refusal Interviews

Montgomery County, Maryland Right of First Refusal

In our team's interview process, we had the opportunity to interview Scott Bruton, the Director of Montgomery County's Department of Housing and Community Affairs. Montgomery County is the most populous County in Maryland and directly borders the District of Columbia. Per the 2020 census, Montgomery had a county-wide population of 1,062,061, whereas Pierce County had a population of 921,130. In comparison, the City of Tacoma had a population of 219,346 in the 2020 census. It is important to remember this program's scale when comparing Montgomery County to Tacoma.

Montgomery County has had a Right of First Refusal (ROFR) law since 1981. The right of first refusal grants an interested party, such as a government agency, the contractual right to buy a property before it is sold to a third party. This right, a key tool used by governments, including Montgomery County, is instrumental in preserving affordable housing and preventing the conversion of subsidized rental properties to other uses. In Montgomery County, rental housing owners of properties with four or more units are mandated to offer the County, the Housing Opportunities Commission (HOC) (the County's Housing Authority), and a registered tenant organization at the property the right to buy the property before selling it to another party, subject to certain exceptions defined in the County Code. In the last three months (February 2024), Montgomery County added an amendment to the ROFR law to expand the program to allow the County to assign its right to purchase to "qualified entities" (prequalified affordable housing developers). To be considered a qualified entity, an organization must meet the following requirements:

1. They must have demonstrated experience in acquiring, maintaining, and managing affordable housing and rental properties. (See glossary for an explanation of Qualified Organizations)

2. They must be a bona fide nonprofit or for-profit entity, or a governmental housing agency or authority that is in good standing under the laws of the state.

3. They must be registered and licensed to do business in Maryland.

4. They must commit in writing to maintaining the affordability of the housing they acquire.

5. They must commit in writing not to disclose any information or documentation received under the ROFR law unless required by law.

It is important to note that the Rockville Department of Housing and Community Development and Housing Enterprises, the Gaithersburg Department of Housing and

Community Development, and Takoma Park Department of Housing and Community Development (all surrounding cities within Montgomery County) are all designated as qualified entities automatically under the law. When exercising ROFR the County (or its qualified entity assignee) and HOC have 60 days to put down a deposit and assume the contract and a total of 180 days after receipt of the notice of sale from the owner to close. Tenants have 45 days to organize and register a tenant organization, and then another 45 days to put down a deposit and assume the contract. The tenant organization then has 180 days after receiving the notice of sale from the owner to close.

The administration of the ROFR law is overseen by the Department of Housing and Community Affairs (DHCA). The multifamily team, consisting of four staff members and a supervisor, evaluates ROFR notices for the County and works with the Housing Division Chief, the DHCA Director, attorneys from the Office of County Attorney, and the County Executive to determine whether or not to exercise the ROFR. Over the past few years, Montgomery County has allocated approximately $100 million annually towards its affordable housing preservation fund to benefit programs like the ROFR and their nonprofit preservation fund (NPF) which provides low interest and interim loans to nonprofit developers and the HOC. The funding is from a mix of tax revenue allocated from the County's budget, funding from community partners, and state programs specifically for affordable housing preservation.

Montgomery County Right of First Refusal Data from 2015-2023

Table 2 shows that between 2015 and 2023, Montgomery County received 369 ROFR notices but only exercised their right of first refusal 12 times. One of the main issues limiting the County's exercise of ROFR is that it had to purchase the property and then within twenty-four hours sell the property to its chosen affordable housing development partner. The purchase prices for multifamily properties in the County can range from tens to hundreds of millions of dollars. The County had to sell the property immediately because it does not have the resources to manage a multifamily rental property with existing staff and does not want to assume the liability of doing so, even for a day. The requirement to purchase the property forced the County to keep tens of millions of dollars readily available each year for a few hours' worth of use. Additionally, conducting two sales on the same day increases financing and labor costs for the County and its chosen development partner. **The County's recent amendment of the ROFR law to allow it to assign its rights to a qualified entity significantly simplifies its ability to exercise and will result in significant financial and opportunity costs. The ability to assign the contract will allow the County to expeditiously use the funds annually appropriated to preserve or create long-term affordability without the need to reserve tens of millions of dollars solely to purchase and then transfer properties to affordable housing developers."** (**[Montgomery County Planning Housing and Parks Committee ROFR Amendments](#)**).

ROFR Data 2015-2023

Year	ROFRs Received	Total Units	Total Dollar Amount	Average Cost/Unit	Number of Properties on which ROFR was Exercised	Number of Agreements Not to Convert	Number of Rental Agreements Assumed of Created	Number of No Action Properties with MPDUs	Number of Capital Investments with Regulatory Agreement	PILOT Agreements	Transactions that did not Close
2023	22	3,615	$980,921,174	$271,347	0	2	4	0	3	1	0
2022	46	7,025	$2,284,606,100	$325,211	2[a]	0	2	4	3	1	1
2021	62	12,725	$3,632,135,923	$284,726	1	7	3	12	3	4	2
2020	60	6,570	$1,706,197,500	$259,695	1	4	5	0	0	7	0
2019	44[b]	7,498	$1,767,103,200	$235,677	0	0	4	0	0	0	2
2018	37	7,490	$1.589,908,278	$212,271	4	0	0	1	3	0	1
2017	34[c]	7,205	$1,504,336,753	$208,791	1	1	5	3	1	0	3
2016	38[d]	7,875	$1,942,150,996	$246,622	2	0	4	3	1	0	2
2015	28	5,748[e]	$1,123,992,200[e]	$195,545[e]	1	1	2	1	3	0	3

[a] The County exercised ROFR for Scarborough Square Townhouses and Apts. and acquired it in partnership with City of Rockville and Rockville Housing Enterprises (RHE). The County exercised ROFR for Westchester West on February 17, 2023.

[b] DHCA received 48 ROFR notices in 2019 but 4 were determined to be exempt, so their information is not included in ROFRs Received, Total Units, Total Dollar Amount, and Average Cost/Unit.

[c] DHCA received 35 ROFR notices in 2017 but 1 was determined to be exempt, so its information is not included in ROFRs Received, Total Units, Total Dollar Amount, and Average Cost/Unit.

[d] DHCA received 39 ROFR notices in 2016 but 1 was determined to be exempt, so its information is not included in ROFRs Received, Total Units, Total Dollar Amount, and Average Cost/Unit.

[e] The HOC property RAD6 Sandy Spring Meadows (52 units) filed a ROFR notice for its RAD conversion, which did not include a purchase price. Therefore, this ROFR is not included in Total Units, Total Dollar Amount, or Average Cost/Unit.

Table 2: Montgomery County ROFR 2015-2023 (Montgomery County's Department of Housing and Community Affairs)

Number of Agreements Not to Convert: Non-Conversion Agreement means a document stating that the owner will not convert or alter what has been constructed and approved. Violation of the agreement is considered a violation of the ordinance and, therefore, subject to the same enforcement procedures and penalties. The agreement must be filed with the recorded deed for the property. (Law Insider)

Number of No Action Properties with MPDUs: Properties that are subject to the Moderately Priced Dwelling Unit (MPDU) program in Montgomery County, Maryland.

PILOT Agreements: A Payments in Lieu of Taxes ("PILOT") Agreement is a legal agreement between a property taxpayer and the taxing authority which allows a company to make property tax payments on an agreed schedule instead of paying the standard tax amount. (DHCD).

 Another weakness of Montgomery County's ROFR is that tenants rarely exercise the ROFR because they do not have the ability to assign their rights to a third party. For comparison, tenants in the District of Columbia use its Tenant Opportunity to Purchase Act (TOPA) law far more often because they have the ability to assign their rights to a third party. Because Montgomery County tenant organizations do not have the right to assign to a third party, they are effectively limited to exercising to convert the property to a limited equity housing cooperative. Conversion to a limited equity housing cooperative is complicated by the need to receive low-cost government loans for most if not all of the purchase and renovation costs for the

property and because there are significant impediments in Maryland State law to the creation of limited equity housing cooperatives.

Montgomery County Maryland Right of First Refusal Program Impacts:

➢ Despite its limitations, it is one of the most successful and established preservation programs in the nation.
➢ It plays a crucial role in the affordable housing market by bolstering the County's multifamily affordable housing supply and enabling community involvement with its authorized partners.
➢ Allows the County more authority and control over the process compared to other preservation policies.

<u>D.C. TOPA and DOPA laws</u>

The Tenant Opportunity to Purchase Act (TOPA) was formulated in Washington, D.C., in response to tenant protests in the early 1970s. The protests demanded stronger rent control laws and protections against displacement due to condominium conversions and gentrification. Implemented through a series of laws between 1974 and 1980, TOPA aimed to prevent displacement and empower tenants by granting them the right of first refusal when their buildings went up for sale. D.C. 's TOPA timeline allows for 45 days of initial organizing, 120 days for feasibility and contract execution, and 120-140 days for financing, acquisition, and closing. (See Appendix 3). TOPA targets 1, 2-4, and 5+ unit housing types and gives tenants the right to assign their TOPA rights to another person or organization. If a tenant organization does not want to buy their building they can use their right to assign to essentially pick their next landlord. To enact TOPA (in D.C.) a building needs to have or establish a tenant association (TA) "representing over 50% of occupied units [who] democratically decide to pursue TOPA. In many cases tenants are unaware of their rights or options before receiving an offer of sale making this level of response noteworthy." ([CNHED](#)). Buildings have to be built between the 1949 to 2000 timeframe to qualify for TOPA. Community-based organizations (CBOs) play a crucial role in educating tenants about TOPA rights and assisting them in forming limited equity housing cooperatives. Properties receiving CBO assistance were more likely to register for TOPA rights than those without assistance.

Washington D.C. TOPA Timeline

TOPA PROCESS TIMELINE AS PROVIDED IN THE LAW

		DAYS	15	30	45	60	75	90	105	120	135	150	165
Initial Organizing	After tenants' receipt of a TOPA offer of sale, they can organize a tenant association if 51% of residents sign on as interested, usually utilizing a technical assistance provider; they incorporate the tenant association, and register interest with DHCD. *If registration is not made within this time, TOPA rights terminate.*			45 Days									
Feasibility and Contract Execution	Tenants determine best form of ownership; seek development partner (if rental); determine total cost of redevelopment including renovation; raise earnest money deposit (5% of purchase price); sign a purchase contract. *If a contract cannot be signed within this timeframe, TOPA rights terminate.*								Next 120 Days				
Financing/ Acquisition	Development team prepares all due diligence to document development plan and renovation; apply for financing (generally a short term bridge loan); hire property management for new ownership; and purchase the property. *If purchase cannot be closed within maximum 120 days (or 240 days if a financing letter of interest is obtained), TOPA rights terminate.*												

180	195	210	225	240	255	270	285	300	315	330	345	360	375	390	405	DAYS
																Initial Organizing
																Feasibility and Contract Execution
				Next 120-240 Days												Financing/ Acquisition

Figure 3: TOPA Process Timeline As Provided By Law (CNHED Sustaining Affordability: The Role of TOPA in DC Housing)

Exercising TOPA rights involves navigating complex legal and development procedures. It often requires the expertise of technical service providers. The Department of Housing and Community Development manages TOPA enforcement primarily through complaint-driven processes. Title companies verify TOPA compliance before property sales; unresolved complaints can hinder sales. After a TOPA sale (whether the tenants buy it or another organization), enforcement typically relies on tenants or tenant organizations filing lawsuits. Tenants in properties of various sizes have the flexibility to assign their TOPA rights or partner with developers. However, in response to abuse of TOPA rights for single-family properties, the District exempted them from TOPA, except for elderly or disabled tenants with existing leases. The law limits these tenants' rights to assign their purchase rights to someone else and prohibits consideration for vacating their unit before a specified period meaning that if you use TOPA you are required to live in that unit for a period of time afterwards.

TABLE C: RESIDENTIAL RENTAL UNITS IN PROPERTIES WHERE TENANTS ASSIGNED RIGHTS OR PURCHASED AS CO-OP WITH AFFORDABILITY ADDED OR PRESERVED																
	Total	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total	16,224	536	543	296	537	1,257	1,068	1,488	2,397	908	1,907	1,305	1,751	1,474	415	342
Ward 1	2,499	-	21	189	150	457	147	457	86	96	86	35	486	227	29	33
Ward 2	1,941	173	170	63	-	565	160	215	25	-	10	171	152	67	42	128
Ward 3	589	-	-	-	-	74	95	-	251	103	-	7	-	59	-	-
Ward 4	2,671	69	245	31	244	59	358	354	154	232	196	272	54	297	88	18
Ward 5	880	-	-	13	95	-	104	-	-	106	159	93	59	53	110	88
Ward 6	1,441	-	10	-	-	-	204	416	256	-	-	267	-	288	-	-
Ward 7	2,052	162	97	-	48	66	-	28	91	36	920	157	110	280	26	31
Ward 8	4,151	132	-	-	-	36	-	18	1,534	335	536	303	890	203	120	44

Data include properties acquired where affordability is in place or is planned, and are tied to the year of the TOPA notice, not the development. Affordability is through LIHTC, Section 8 or other project-based subsidy, rent control, or LE co-op.

Figure 4: Residential Rental Units in Properties Where Tenants Assigned Rights or Purchased as a Co-Op with Affordability Added or Preserved (CNHED Sustaining Affordability: The Role of TOPA in DC Housing)

TOPA provides tenants with a voice in the negotiations over the sale of their building. Over the years, TOPA has had a positive impact on the availability of affordable housing in the District, and has helped to prevent displacement of tenants. Through TOPA, tenants are able to participate in shaping development outcomes, and can achieve goals related to renovation, affordability, and even homeownership. While tenant buyouts can be an outcome of negotiations,

it is rare for an entire building to be bought out. The success of TOPA depends on a support network that includes tenant organizers, technical assistance providers, attorneys, developers, and flexible financing tools. For this policy to be effective, expertise in finance and property management should be available to assist tenant groups that form. However, there are still challenges that impede affordable development based on TOPA rights. One such challenge is timeliness: TOPA extends the timeline to sell an occupied building. Another challenge is with enforcement and adaptation to changing housing dynamics. Overall, TOPA has been instrumental in protecting tenants' rights and preserving affordable housing in Washington, D.C.

Additionally, TOPA could serve as a strategy to drive homeownership if tenants choose to convert units into condos, co-op ownership model, or limited equity co-ops. TOPA centers on the tenants or residents of the building doing community organizing and pushing the grassroots effort forward, and it often uses gap financing from the city. It relies heavily on subject matter expertise from community organizations to accomplish a TOPA purchase.

The District Opportunity to Purchase Act (DOPA) is another tool for preserving affordable housing in Washington, D.C. The Mayor can buy certain apartment buildings to maintain affordable rental units for tenants. DOPA helps to increase the total number of affordable rental units in the District. DOPA is subservient to TOPA, which means the District can only act if tenants fail to exercise their TOPA rights. The law allows the District to buy properties with five or more units if a minimum of a quarter of the apartments are affordable for people making less than 50% of the area median income. The District passed DOPA in 2008, but due to decreased appropriations for affordable housing, it took until 2016 for Mayor Muriel Bowser to recommend its implementation. The District released regulations in 2018 and recruited Pre-Qualified Developers to assist in exercising DOPA rights. The District published a list of chosen Pre-Qualified Developers in 2019. However, to date, the District has not exercised its DOPA rights to buy a property. DOPA is less commonly used since most cities do not manage affordable housing communities directly.

Note: We reached out to the D.C. Department of Housing and Community Service for a request for an interview and had no reply. But Scott Bruton prior to his role at Montgomery County worked at the Coalition for Nonprofit Housing and Economic Development (CNHED), in collaboration with The Council of the District of Columbia. Scott has close ties to D.C.s TOPA law and with CNHED provided recommendations for the TOPA law. Lee Guekguezian also commented on D.C.'s TOPA law.
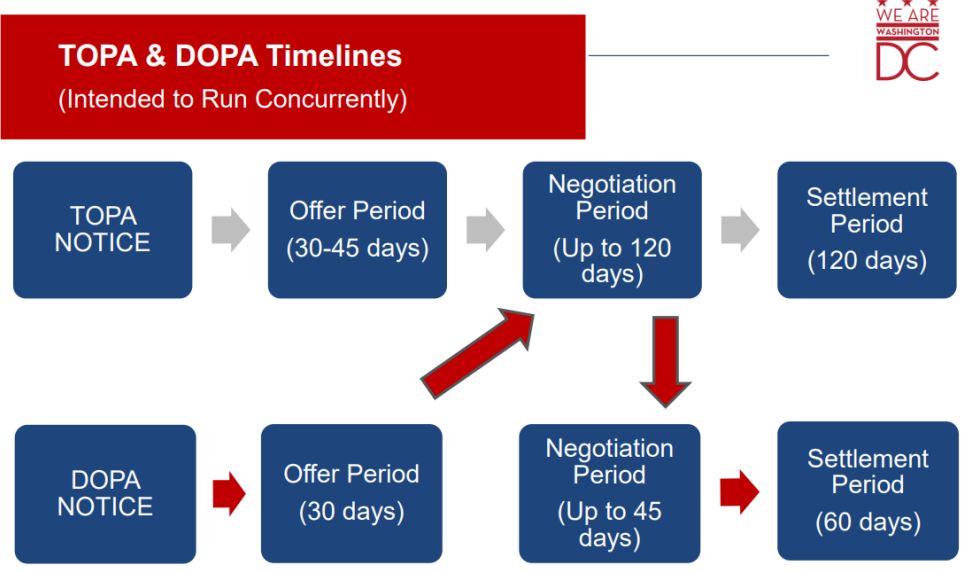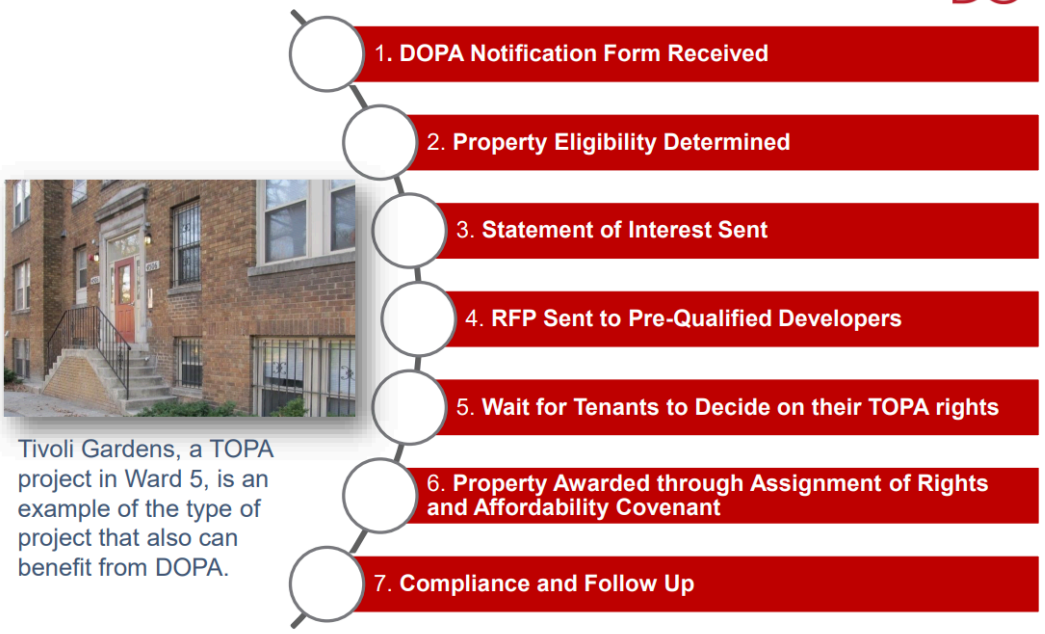
Figure 5: TOPA & DOPA Timelines (D.C. Department of Housing and Community Development)

Figure 6: DOPA Assignment of Rights in 7 Steps (D.C. Department of Housing and Community Development)

Washington D.C. Tenant Opportunity to Purchase Program Impacts

➢ Creates resident councils and tenant organizations.
➢ Empowers often times marginalized residents/tenants by giving them a seat in property sale negotiations and shaping the outcome of the transaction.
➢ Preserves affordable housing " 16,224 affordable units were developed or preserved through TOPA." (CNHED).

Washington D.C. District Opportunity to Purchase Program Impacts

➢ When paired with TOPA, DOPA is more compatible with Low-Income Housing Tax Credits (LIHTC).

Seattle Notice of Intent to Sell

Although the City of Seattle is interested in preservation ordinances, TOPA, and ROFR laws, the City has not implemented comprehensive policy packages to address affordable housing preservation. In an interview with a policy analyst from the City of Seattle Office of Housing Strategic Advisor of Policy and Equitable Development, she noted

"There has not been a lot of interest at the Office of Housing by landlords to come knocking on our door and say 'We love for you [to help us accomplish affordable housing preservation].' To do this, we don't have tax incentives to offer good preservation programming in the state of Washington."

"the notice of intent to sell has not shown to be very impactful and it's our only preservation program that we have right now."

The Notice of Intent to Sell ordinance, reauthorized by Council in 2019, provides the City with information about the intention to sell residential rental property (2 units or larger) with at least one unit rented at 80% of Area Median Income (AMI) or below. The ordinance does not apply to single family homes. The City can use this notification information to assess whether to acquire such properties in collaboration with the Seattle Housing Authority and community partners. The City will also notify affordable housing providers of the owner's intent to sell, which will allow the providers to submit a letter of interest and make an offer on the property. The ordinance's objective is to provide an opportunity to preserve naturally occurring affordable housing and prevent displacement. The notice may help residents find tenant protection and relocation resources if needed. All in all, the notice of intent law is a great first step towards accomplishing multifamily affordable housing preservation.

Seattle's Notice of Intent to Sell Program Impacts

➢ This is a low cost policy that could be managed by a single staff member.

3.2.2 Additional Preservation Policy Case Studies

San Francisco, California Community Opportunity to Purchase Acts

San Francisco's rent-controlled apartments used to provide stability for residents, but now they are being targeted. Long-term landlords who previously sold their buildings to investors looking for steady rental income are now at risk of being outmaneuvered by cash buyers and speculators. These individuals use tactics such as Ellis Acts (California specific law that gives landlords the "right to exit" the rental housing business), owner move-ins, harassment, or buyouts to evict tenants and sell the units for exorbitant profits. This trend could have a serious impact as these units are often rented at market rates or converted to short-term rentals, tenancy in common TICs (multiple tenants sharing legal rights to one property), and condos.

In 2019, San Francisco passed the Community Opportunity to Purchase Act (COPA) to tackle problems of displacement and gentrification. This law mandates that owners of multi-unit properties must inform qualified nonprofit organizations, such as land trusts or affordable housing developers, of their plan to sell before listing it. The nonprofit must also obtain financing for the property and any necessary renovations. San Francisco also offers a subsidy program for buyers, which is available at a low interest rate. If no qualified nonprofit expresses interest in purchasing the property within five days, the seller can list the building for sale. COPA applies to selling any non-condo residential building with three or more units. It empowers qualified nonprofits with the first right of offer and the first right of refusal over multi-family residential buildings and vacant lots to create and preserve permanently affordable housing.

Under COPA, sellers must notify the qualified pool of nonprofit organizations of their intent to sell. Potential nonprofit buyers have 25 days to work with tenants, exercise their first right of the offer, and enter into a Purchase-Sale Agreement if accepted by the seller. Although the seller is not required to accept the offer, the qualified nonprofit also has a right of first refusal to match a competing offer. Sales are defined to include partial transfers within Limited Liability Companies (LLCs). In closing, COPA ensures that deed restrictions will be placed on the building, guaranteeing affordable housing "for the life of the building," with a mean value of all rents paid in the building not exceeding 80% of the Area Median Income. This commitment to the long-term affordability of these units is reinforced by the potential transfer of the building to tenant ownership under a Limited Equity Cooperative or other model, as long as permanent affordability deed restrictions are maintained. The ordinance includes incentives, such as a partial exemption from the City's transfer tax and the potential for qualified nonprofits to facilitate sellers' efforts to obtain federal tax benefits. These benefits underscore the viability and potential positive impact of COPA.

San Francisco has invested almost $3 million between 2019 and 2024 to strengthen the capacity of nonprofit organizations that serve tenants in neighborhoods that are

disproportionately affected, especially those of color. To achieve this goal, three highly regarded community-based organizations, MEDA, the San Francisco Housing Accelerator Fund, and Chinatown Community Development Corporation, serve as models for other nonprofits while conducting a thorough analysis to determine the most effective methods for scaling this model. The City has also provided up to $375,000 per unit to ensure these buildings can be purchased at fair market value. The committed investment for 2019-2020 is $37 million.
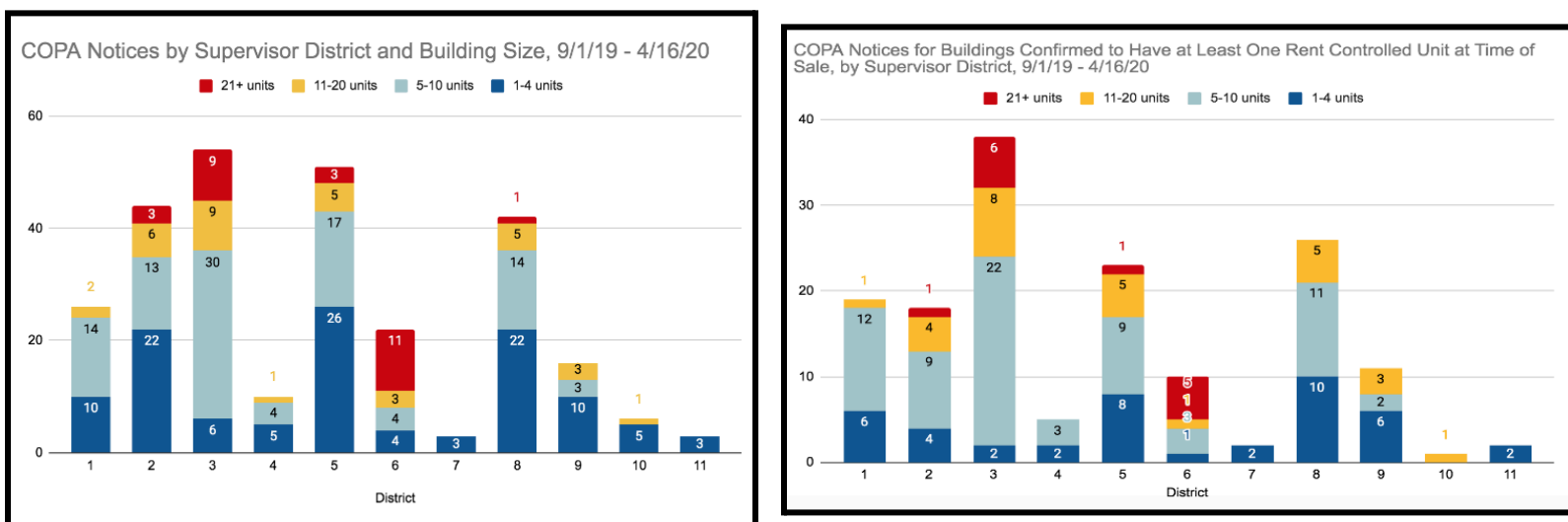
Figure 7: San Francisco COPA Notices 2019-2020 (Mission Economic Development Agency)

San Francisco's Community Opportunity to Purchase Act Program Impacts

➢ Allows for cities to have a less active role in comparison to community based organizations.

Chicago, Illinois Preservation Ordinance

Preservation ordinances that facilitate the purchase of older buildings and redevelop them to create multifamily and mixed-use buildings can also help mitigate displacement in neighborhoods.

A pilot initiative was launched in Woodlawn, a Chicago neighborhood, enabling tenants to purchase the buildings they reside in. This was made possible by implementing the Tenant Opportunity to Purchase Act (TOPA). The pilot scheme was unique in that it was specifically developed for Woodlawn and was not implemented in any other part of the city. However, no building has participated in the program as of the publication. The city has only received inquiries from other cities, but no buildings planning to sell have expressed interest.

The City of Chicago also has a preservation ordinance for single-room occupancy: "Single-room occupancy residential hotels (SROs) were among an array of new housing options developed in the city... SROs were a subset of residential hotels designed with lower-income workers in mind; these buildings provided a modest resting place for workers who needed easy access to jobs in the city and for whom ownership was either not feasible or not desirable." (CNHED). SROs are usually low-barrier rental housing options as they do not require a move-in fee, security deposit, or background/credit checks. The Single-Room Occupancy Preservation Ordinance is a law that protects residents living in SRO buildings. If a resident complains about code violations, engages in resident organizing activity, or participates in purchasing the property, the owner cannot terminate their tenancy. The ordinance also presumes that an owner's conduct is retaliatory if they act against a tenant who engaged in such activities.

Owners of SRO buildings can avoid complying with the ordinance by paying a "preservation fee" or selling to a buyer who meets certain affordability restrictions. If the owner chooses to pay the preservation fee, they can opt out of the 180-day notice period altogether. The fee is $20,000 per unit in the building, and the owner is also required to pay each long-term resident who will be displaced by the sale a one-time relocation assistance fee of $8,600.50. Single-room occupancy (SRO) building owners can be exempt from the ordinance if they sell to a buyer who must maintain at least 33% of the units as affordable housing for at least 20 years. The affordable units should be for households at or below 40% of the Chicago region's median gross household income. Suppose a purchaser uses the ordinance to buy an SRO. In that case, they must maintain at least 80% of the building's existing units as affordable housing for low-, very low-, and extremely low-income individuals and families for at least 15 years. If the owner and purchaser agree to maintain the property as affordable housing, they must include a clause in the purchase and sale agreement. The purchaser can set aside one unit as subsidized or unsubsidized affordable housing for low-income individuals and families for each unit they maintain as subsidized or unsubsidized affordable housing for extremely low-income individuals and families. Moreover, any unit subsidized such that the resident's portion of the rent is 30% or less of their adjusted gross monthly household income can be rented to a low-income individual or family.

If the building is maintained as affordable, but not all long-term residents can remain in or return to the building, the owner must comply with the one-time relocation assistance fee. Suppose the owner sells to a buyer not committed to maintaining the affordability of at least 80% of the building's existing units. In that case, they must pay each long-term resident displaced by the sale a one-time relocation assistance fee. The fee is either three months' rent or $2,000, whichever is greater. The Single-Room Occupancy Preservation Ordinance also created the SRO Improvement and Stabilization Program, which incentivizes the preservation of SRO units by providing forgivable loans for rehabilitating SROs, gap financing grants to fill the difference between prospective preservation purchasers and prospective buyers that intend to convert SROs to other uses, and city-funded social and case management services. The law requires that all

preservation fees collected according to the ordinance be used solely to operate the SRO Improvement and Stabilization Program. Furthermore, the ordinance directs Chicago's commissioner of planning and development to investigate the possibility of providing Cook County property tax credits for SRO owners who maintain affordable housing.

Chicago's Preservation Ordinance Program Impacts

➢ The SRO preservation ordinance was enacted to address homelessness and "maintaining an economically diverse population" in Chicago.
➢ The preservation ordinance works to create partnerships with the City, housing developers, and organizations interested in preservation work.
➢ The preservation ordinance is a package of policies including the notice of intent to sell, right of first refusal, tenant opportunity to purchase act (limited to the Woodlawn pilot program), and a housing preservation fund.

3.2.3 General Findings on Implementation

Importance of Community Engagement/Active Stakeholders

When implementing preservation ordinances, policies like TOPA (Tenant Opportunity to Purchase Act), COPA (Community Opportunity to Purchase Act), or ROFR (Right of First Refusal) must prioritize community partners and qualified organizations (see appendix 12) as key stakeholders. This means emphasizing affordable housing development and financing, engaging affected residents to provide education and legal resources, and supporting the formation of tenant associations. When considering which policies would work best for Tacoma, we must consider who we want to involve as stakeholders in the preservation policy and who will be the primary beneficiary. For example, some jurisdictions like Montgomery County allow mission-driven for-profit businesses to use the ROFR as long as it preserves affordable housing within the program criteria. To juxtapose this, San Francisco's COPA law applies to a qualified non-profit. Strong program goals can help tell Tacoma which stakeholders should be involved in the process. Many ROFR and TOPA initiatives fail due to program misinformation spreading - community partners are a catalyst to fight misinformation and to help connect tenants to program resources. Tacoma needs to create a network of technical providers to make preservation policy happen smoothly. When referring to community based organizations in the context of preservation work we are referring to organizations doing.

➢ Education and communication
➢ Tenant/resident organizing
➢ Legal advice (for tenant groups)
➢ Acquisition of affordable housing buildings (qualified organizations)

See Appendix 2 for examples of community based organizations/partners list

CHAPTER 4: Community Prioritization Policies

The following literature review on community prioritization incorporates research published in government reports produced by departments at the county and city level, as well as academic research and newspaper articles. The section on addressing racial disparities while meeting legal requirements is centered on research conducted by The Housing Solutions Lab at the NYU Furman Center, and supplemented with articles on relevant legal cases and injunctions.

Of the three community prioritization administrators we spoke with, all worked for programs operating on smaller scales than many of those included in our overall analysis. The programs that operate in Portland and Seattle, places with practitioners we were able to interview, are much different than the broad programs in New York City and San Francisco. This is important not only because any program in Tacoma will inherently be on a smaller scale (due to the size of the city), but because practitioners spoke to the strengths of having smaller, more specified programs that are highly responsive to community needs. The following chapter will dive into how larger programs operate and the challenges facing them. We will also detail the logistical features of the Seattle and Portland policies, which will ultimately serve as more suitable models for the City of Tacoma.

4.1 Literature Review

4.1.1 Background Information on Community Prioritization Policies

Community prioritization policies are a measure aiming to counteract the historical harm lobbied on BIPOC households and to proactively work against the present-day displacement pressures. Policies vary by location, but generally "[prioritization] policies give some applicants a better chance of landing a spot in a new affordable housing development, usually based on whether they live or work in the development's neighborhood. Typically, developers set aside a portion of the new units for a second lottery involving people who qualify for community preference" (Cohen, 2019). While these policies are primarily implemented via governmental entities, who mandate that developers comply with allotment requirements, they are occasionally pursued and enacted by nonprofit developers. Throughout US history, BIPOC households have been targeted by private and public policies that weaken their abilities to maintain stable housing and develop strong neighborhood communities (Rothstein, 2017). These policies include redlining, disinvestment, and discriminatory loan practices.

The first large-scale community prioritization policy was established in New York City during the 1980s by former Mayor Ed Koch (Hirsch, 2024). The initial percentage of units set aside for community residents was 30% and rose to 50% during the early 2000s (Hart, 2017). The city pursued this policy as a way of increasing integration within buildings, and as a means

of assisting low-income applicants in avoiding displacement due to gentrification (Hart, 2017). The program is still in use in New York City, and cities with similar policies include San Francisco, CA; Portland, OR; Seattle, WA; and Cambridge, MA (Kaplan, 2019).

Community prioritization policies, also referred to as community preference or local preference policies, center around mitigating instances in which "existing residents of a neighborhood are involuntarily forced to relocate" (King County, 2021). This can be via any of the four displacement factors mentioned in Chapter 1 (see page 11). The residents historically most likely to be impacted by these displacement factors are largely low-income and middle-income, and disproportionately BIPOC. Displacement can have huge negative consequences for individuals, increasing the risk of homelessness and potentially creating adverse outcomes on health, education, and earnings (King County, 2021). More broadly, displacement "weakens the cultural fabric of a community" by "[distancing] households from cultural anchors, businesses, community establishments, and faith-based organizations that bring neighbors together" (King County, 2021).

Surveys of residents in areas subject to community prioritization policies provide important evidence for a less obvious factor in the importance of these policies: people value remaining in their neighborhoods for reasons unrelated to logistical concerns. Specifically, a sense of belonging is a top reason that residents at risk of displacement want to remain in their neighborhoods. In a survey of Portland Preference Policy applicants, 91% of respondents "agreed that the history of this neighborhood matters to me," 83% "have friends and family in [the] neighborhood," and convenience to work or school was not a primary motivation for entering the program (Thurber et al., 2021).

4.1.2 Community Prioritization Policy Structure

Community prioritization policies vary from location to location. Generally, they come into play during the leasing of new affordable housing units located in a neighborhood identified as gentrifying, informing administrative protocols regarding application decisions. Targeted populations are given preference in application lotteries for affordable units. There is both flexibility in how housing units are allocated, and the criteria for which applicants should be considered in a program, which we will detail below.

4.1.2.1 Housing Unit Allocation Considerations

There is a wide range of variation regarding how many units are typically allotted for community prioritization programs. The range identified in an analysis of several programs is 20% to 50%, with most cities leaving the ultimate percentage up to the discretion of either the government or the developer overseeing a project. The majority of programs we analyzed had an upper limit of 40%, but the City of Seattle allows for up to 50% of units to be held aside for community prioritization applicants. New York City previously had the same upper limit, but

recently dropped it to 20% after a legal battle centered on their community preference program (Zaveri, 2024).

Most community prioritization programs have mandatory allotments for all buildings subject to a jurisdiction's policy. The criteria used to assess who should get preference are not geared towards any one neighborhood's context or the goals of a particular building project, but rather based primarily or entirely on household income and current proximity to a new development. These standards are applied across projects in a city. These mandatory allotments generally apply to buildings with inclusionary units, which are below-market-rate units that a market-rate developer builds within a multifamily project as a result of a city's inclusionary housing policy (Kaplan, 2019). Community prioritization policies also generally apply to nonprofit units or units that are constructed in buildings that are composed entirely of below-market-rate units (Kaplan, 2019). The City of Seattle targets only nonprofit units, and these units are only ever designated for community prioritization on a voluntary basis (City of Seattle, 2019).

Beyond our conversation with Jessica Gomez at the City of Seattle, which is covered in detail later in this chapter, our team also looked into examples of community prioritization allotments and their effects in Seattle on a project-by-project basis. Seattle's policy was pioneered by projects such as Uncle Bob's Place, which opened in the International District of the city in 2016. Leslie Morishita, the development director for InterIm which constructed and operates the building, was reported as saying "It was a pretty simple thing to implement...It didn't take a lot of money, just a little extra effort" (Cohen, 2019). To date, the organization hasn't faced any complaints from HUD and affirms that prioritization has helped them tremendously in their goal of housing low-income, long-term residents of the neighborhood (Cohen, 2019). This success helped model how the program would take shape in Seattle, leading to the 2019 executive order.

In 2019, Capitol Hill Housing and Africatown finished the Liberty Bank Building development. These organizations worked with Emily Alvarado, the Manager of Policy and Equitable Development at the City's Office of Housing at the time, to coordinate their affirmative marketing efforts with voluntary community prioritization (Vansynghel, 2019). They were able to lease 86% of units in the building to African-American applicants, demonstrating how community prioritization of units can help focus the efforts of affordable developers in achieving their equity goals (Vansynghel, 2019). Alvarado echoed officials from other cities, such as San Francisco, in her stance that community prioritization policies can further the aims of the FHA if crafted correctly, and, to date, there have been no legal challenges to buildings in the city who have opted-in to the policy (Vansynghel, 2019). Particularly noteworthy is that this building set aside 50% of units in a census tract which, per the 2020 Census, was less than 11% Black and majority-white. Achieving equity goals using a community prioritization goal in a largely white neighborhood demonstrates the potential of these policies to provide better housing outcomes for local members of the BIPOC community, rather than worsen them.

This contrasts with negative outcomes in the City of Brookline, Massachusetts, which were brought to our attention by Jennifer Reardon (who we interviewed regarding her work with MAPC). In Brookline, the mandatory community prioritization goals in majority-white neighborhoods led to the unintentional prioritization of white applicants (Wicked Local, 2020). Brookline's policy required 70% of units to be set aside for community prioritization applicants but lowered the proportion to 25% following an analysis that demonstrated their former policy did not support the goal of keeping long-term, low-income Black and Hispanic residents within the area (Wicked Local, 2020). The necessary alteration of the community prioritization program in Brookline highlights the importance of adjusting policies based on evidence, and listening to community feedback throughout a program's ongoing implementation. It also suggests the value of having community prioritization be undertaken by willing parties who care about supporting equity outcomes for their development projects.

4.1.2.2 Potential Applicant Eligibility Criteria

Criteria differ between programs, oftentimes in response to the initial problems that led to the development of a community prioritization program. Considerations are made for both current residency and historical ties to a neighborhood. For example, preference is often extended not only to those who were displaced by infrastructure projects, but their descendants. This is the case in Portland's N/NE Preference Policy, which was enacted to counter the negative impacts of the city's urban renewal policies that began in the 1950s (Thurber et al., 2021). Berkeley's recently enacted policy has many criteria for eligibility, but places the most emphasis on families who were directly impacted by BART construction in the 1960s and 1970s (City of Berkeley, 2024). Beyond current residency or former residency, considerations are also made for historical ties to a neighborhood unrelated to living in a particular geography within a neighborhood. These connections can include formerly studying or working in a particular neighborhood, or belonging to a faith-based or cultural organization in an area (King County, 2021). Census tracts are often used when drawing geographic boundaries defining eligibility, but radii around a specific multi-family project are also used. In some cases, the area of impact of an infrastructure project is a determinant boundary. This is true for Portland, OR (Thurber et al., 2021).

Beyond these qualification considerations for a community prioritization policy, administrators must also consider how they want to determine eligibility via documentation. While identification cards and old mail are standard ways of establishing an applicant's ties to a neighborhood, some programs use less traditional documentation, such as yearbooks and organizational membership documents (King County, 2021).

Other administrative considerations include the duration of the community prioritization policy for each housing unit subject to the program. Whether units are subject to the policy only for the period of the initial lease-up or for the useful life of a building must be determined by administrators. There is disagreement about whether locking units into a community

prioritization program indefinitely is fair over the long term, given the ever-changing nature of urban areas (Norquist, 2009). However, many argue adequate time must be provided to establish community prioritization effectively, and having short-term durations undermines the ultimate goal of geographic stability (Norquist, 2009).

It should be noted that many of the subject programs included in our analysis help prevent homelessness but are ultimately targeted at currently housed residents in a specific neighborhood. Other community prioritization policies specifically target chronically unhoused families and individuals, which is outside of the scope of our team's project.

4.1.3 Community Prioritization Policies and Legal Considerations

Three primary legal challenges to community prioritization policies have been identified by scholars in the field:

- Preference policies could be interpreted as penalizing those who have a preference for traveling and migrating, and their rights to pursue their preferences

- These policies may be "implemented with the intention of excluding protected classes of persons," violating the Equal Protection Clause

- Preference policies may be in violation of "the Federal Fair Housing Act by creating or perpetuating discriminatory racial impacts"

- (Norquist, 2009)

These three issues can also be summarized as "(1) disparate impact; (2) perpetuation of segregation; and (3) disparate treatment" (Hart, 2017).

Beyond any obligation to craft policies that follow the letter of the law, most of these legal challenges stem in response to community prioritization policies that have allegedly worsened housing issues for BIPOC residents in gentrifying communities. Therefore, it is doubly beneficial for public administrators to craft community prioritization policies that effectively and equitably address racially disparate housing outcomes.

There has been conversation in the legal sphere around providing community prioritization benefits based on durational residency, rather than bona fide residency. Compared to bona fide residency, which has no time element and applies to all current residents, durational residency requirements demand applicants demonstrate that they have been a resident for a sustained period of time, usually at least one year (Freund, 2018). The vast majority of efforts tying such benefits to a durational residency requirement have been struck down by courts due to the fact they penalize those who wish to move (Hart, 2017). None of the cities we examined had community prioritization policies that require durational residency to be established, and often they allow applicants to receive benefits based on historical ties to a region.

Addressing racial disparities in housing is a central aspect of community prioritization. These policies are geared towards mitigating any negative impacts of gentrification, a problem with a large racial component. While legal contexts differ at federal, state, and local levels, the Housing Solutions Lab at the NYU Furman Center published a report going in depth about how to address legal concerns when crafting housing policies with racial considerations. Most community prioritization policies function through weighted lottery systems, and incorporating race into the administration of such policies can come into conflict with the federal Fair Housing Act. Based on the NYU report, any city looking to implement a community prioritization policy based on race would have to provide evidence that their government has been a passive participant in a system of racial exclusion, and continually prove this if they want a racial component included in their program. Meeting the legal threshold in terms of substantiating a history of race-based housing discrimination could be difficult, but not impossible. The NYU report cites several cities that have crafted race-conscious housing policies and analyses, including the City of Seattle.

Even while avoiding race-specific language, both New York City and San Francisco have been subject to legal battles over the potential racially disparate impacts of their community prioritization policies. San Francisco created a Neighborhood Resident Housing Program in 2015, which set aside 40% of all new affordable units in the city for residents within a half-mile of any relevant development (Grabar, 2016). In 2016, the City of San Francisco faced legal challenges in response to this preference policy. HUD asserted that the Neighborhood Resident Housing Program violated the Department's Fair Housing Act (Grabar, 2016). In the end, San Francisco's government was able to successfully argue their community prioritization program furthered the aims of the FHA, and to date has successfully marketed over 600 units through the program (Blumgart, 2019).

The community prioritization program in New York City faced legal challenges not from the federal government, but from a local grassroots effort. Three Black women, Janell Winfield, Tracey Stewart, and Shauna Noe, sued the City of New York in 2015, arguing that the city's community prioritization program perpetuated housing segregation (Hart, 2017). In the case, *Winfield v. City of New York,* the adverse effects of their program were attributed to the large percentage of units set aside for community prioritization applicants (50%) in areas that were already predominantly white (Zaveri, 2024). This made it challenging for applicants from the BIPOC community to access affordable units included under the program, and consequently gave preference to mostly white residents in the city.

4.2 Findings

4.2.1 Central Strategy

Most cities aim to pair applicants with units constructed both via inclusionary policies and through non-profit funding, based on what is available within a geographic area as opposed

to within a single building project. This is the case in Portland, where community prioritization is used not only for rental units, but also in prioritizing home loans for eligible applicants. Seattle has a different approach in which developers create an application process that takes into a form of community prioritization that centers the aims of that particular project.

In cities where community prioritization programs are required by the government, the impetus is ensuring that all affordable developments offset their impact on a neighborhood. Essentially, these mandated policies try to capture the entire demand of their locality's population with regard to affordable housing available via community prioritization. They gauge demand from all residents seeking to live in their current neighborhood, former neighborhood, or the neighborhood of their elders by providing one overarching application. These residents submit applications to a city-wide housing lottery and receive additional points based on their ties to the community, which adds weight to their application within the lottery. When selected, city governments pair applicants to new units from any project within a relatively close geography.
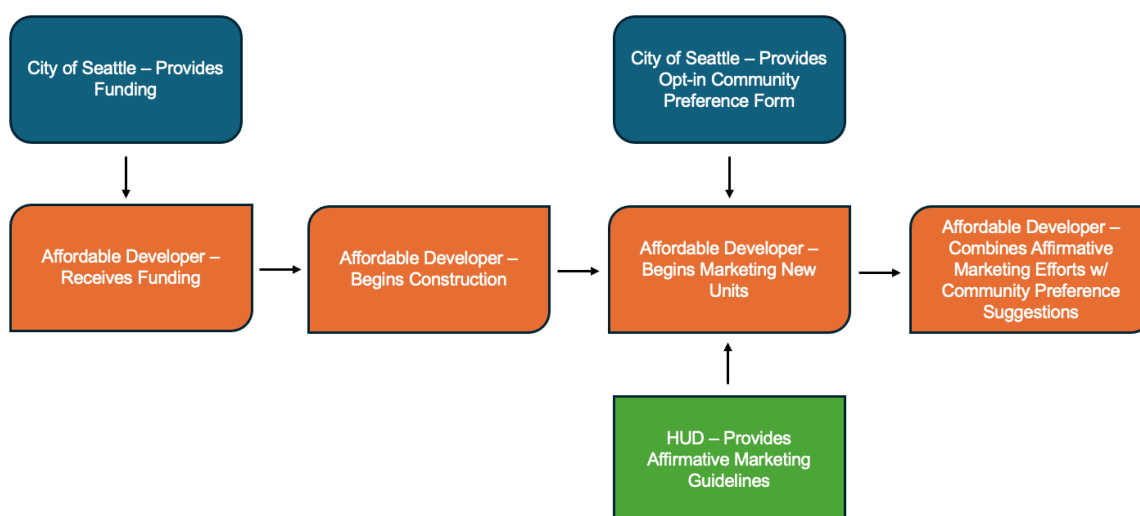
Figure 8: Flowchart of City of Seattle Community Preference Policy

In Seattle, the philosophy is centered on co-developing preference guidelines with developers who are already focused on addressing the housing needs of vulnerable community members. The policy was endorsed as an executive order by former Mayor Jenny Durkan, who emphasized the city wanted the ability to evaluate the suitability of community prioritization on a project-by-project basis and tailor prioritization to each project (Beekman, 2019). Community prioritization is led by affordable developers, working in tandem with affirmative marketing policies that are required by the federal government. Said developers, who are supplying affordable housing, voluntarily set aside some of the new units in their entirely affordable buildings for community residents. Seattle's current guideline recommends setting aside up to

50% of all affordable units (City of Seattle, 2019). In our interview with Jessica Gomez, we learned that not only does the City of Seattle's form request the community prioritization requirement cover any explicit racial categories, but a legal advisor from the City of Seattle and a legal advisor for project developers each review requirements for compliance with HUD FHA guidelines.

4.2.2 Community Involvement

Everyone we interviewed emphasized that their community prioritization policies were built in response to community demand, and grassroots activism shaped how community prioritization policies were formed in each locality. This feels especially important to note given that community prioritization policies are directly responding to the desires of vulnerable communities who want to maintain their geographic ties.

Portland has continually held community meetings to receive input on its program, and the representatives we spoke with from the Portland Housing Bureau attributed the formation of the policy to grassroots advocacy. Seattle's policy was developed in response to advocacy efforts from affordable housing developers, community development corporations, and housing activists. Specifically, Seattle-area stakeholders were inspired by efforts from across the country, which demonstrates a high level of buy-in from people involved in the affordable housing sector. Both users and providers of community prioritization policies in Seattle are noted as being in favor of the policy, which helps the program run smoothly and avoid pushback.

Representatives from the Center for Urban and Regional Affairs (CURA) at the University of Minnesota noted the Twin Cities (Minneapolis/St. Paul) area does not have a community prioritization policy, but there is interest from both the community and people on their team. That said, one member of the CURA team specified it would be a difficult policy for them to develop to suit the geographic region they subject, in that it is likely too large and contains too many levels of government to be feasible. Creating one central system that would serve many applicants across different cities and neighborhoods would be expensive and unwieldy. However, there is the potential for cities within the overall geography to develop community prioritization policies within their jurisdictions. The City of Minneapolis is currently exploring the possibility of a community prioritization policy that would apply to Neighborhood Stability Program (NSP) areas (Coleman, 2020).

4.2.3 Policy Catalysts

Often infrastructure projects trigger physical displacement of residents and create the need for anti-displacement policies. Portland's N/E Preference Policy responded to urban renewal policies that the city employed for several decades, starting in the 1950s. Funding for Portland's overall anti-displacement strategy is provided in part by taxes paid on new developments in Urban Renewal Areas, tying the cause of displacement to a potential remedy.

While the Twin Cities area does not currently have a community prioritization policy, members of the CURA team noted that transit projects have caused trauma amongst vulnerable communities in the region. The level of upset caused by these large-scale infrastructure projects often triggers the grassroots movements that ultimately result in the development of community prioritization policies.

Direct economic displacement is a near-universal cause for these policies, and everyone we spoke to referenced broader changes in the local housing market and economy that led to demand for anti-displacement policies. Increases in rental rates and the costs of single-family homes have made it challenging for tenants to afford their current housing. Consequently, indirect placement has also occurred, and creating a mechanism for the descendants of an area to move back into their historical family neighborhoods is a consideration in all community prioritization policies we examined.

4.2.4 Level of Coordination Between Agencies

Most cities with community prioritization policies, such as Portland, have to navigate within their governments and account for separate policies at different levels of local government that aim to do the same thing. Representatives from Portland's program mentioned that on occasion administrators from programs at different levels of government "talk past each other rather than with each other." This is a greater issue with other programs in the city, such as preservation-related policies, because the community prioritization policy in Portland has a very limited scope. This has enabled the N/NE Preference Policy to operate without much interference, since there is a high level of justification for the project and deeply local specificity.

In the Boston area, state-level policies ultimately prevent many local governments from implementing community prioritization policies. In our interview with former Metropolitan Area Planning Council (MAPC) employees, they stated that state-level policies around housing applications interfere with the ability to create local community prioritization policies.

In Seattle, the Office of Housing and the Seattle Office of Civil Rights work directly with non-profit multi-family developers. This results in minimal coordination between separate agencies. The one level of government Seattle, and all other localities with community prioritization policies, must act in line with is the federal government via HUD. All affordable housing projects must use affirmative marketing, per HUD, which usually advances meeting equity goals without explicitly mentioning race within the policy or its associated paperwork.

4.2.5 Legality

At least two cities that have implemented demand-side/governmentally mandated community prioritization policies have run into legal challenges. We only spoke with officials from unimpacted cities, and two of those cities are within the Ninth Circuit (the ultimate court of

appeals that Tacoma is also subject to). Thus far, Seattle has avoided such legal issues. The Portland city officials we interviewed were explicit that their policy did not directly focus on any one racial group, a way of clearly noting they operate within HUD guidelines.

Municipalities avoid race-forward language by discussing particular census tracts that have been identified. Seattle has a lawyer who reviews developers' community prioritization policies, which are also cleared by a development company's own legal counsel. One way Seattle builds upon the capacity of their community prioritization policy, with regards to assisting BIPOC residents get access to affordable units, is through pairing the policy with affirmative marketing that captures key demographics.

4.2.6 Resource Application (Financing and Staffing)

Portland has a team of four people working on its community prioritization program. The community prioritization policy in Portland was established in part of a larger $20M budget set aside to address housing concerns in the city, with a specific focus on north/northeast Portland. Obviously, with only four FTEs, salaries for community prioritization do not comprise the full budget of the program. Much of the costs can be attributed to other parts of the program, including homeowner loans and repair grants. Portland's community prioritization policy includes many costs beyond administration because of these other costly aspects.

Seattle has the tasks associated with their community prioritization program rolled into the responsibilities of existing positions. An administrator for the Seattle program stated they only receive five to ten applications a year. Additionally, because they have a simple process that is largely managed by the developer, not the city, these applications do not incur a large administrative burden. The affirmative marketing that supplements community prioritization in Seattle is undertaken by the developer, and the units set aside are not tied to program-specific funding.

4.2.7 Available Housing Supply

Everyone we spoke to felt that much of a program's potential success is dependent on the amount of housing available for the program. If no affordable units, or too few affordable units, are being built, even the best program is meaningless. Portland remedied many of its early problems with the program by partnering with the Portland Housing Authority (Home Forward) after disappointing results in 2018. It should be noted that the initial issues with Portland's program stemmed directly from the overwhelming demand for affordable housing, which resulted in a stunning number of initial applications.

Seattle's strategy is rooted in having a precise program in which a high percentage of units within any given project go to the specific populations of concern, based on the goals a nonprofit developer has identified for their housing development. However, the opt-in method

used in the City of Seattle inevitably means some developers do not engage with the community prioritization process, and some new units constructed are not set aside for allotment. This contrasts with mandated programs that are less tailored around a certain equity goal or a neighborhood's context, and center around solely making sure all new affordable units are guaranteed to be subject to a community prioritization policy. The trade-off in this case is fewer units overall that are incorporated into a program, but immense accuracy in the units that are marketed and ultimately leased by low-income, mostly BIPOC, residents of a neighborhood.

CHAPTER 5: Measuring Displacement

The literature review on measuring displacement began with a direct search of academic literature using the search term "measuring displacement." This yielded several articles that were used as jumping-off points for related terms (ex: "neighborhood early warning systems;" "smart cities;" etc.). Reviewing this literature also gave a starting point for identifying municipalities with displacement and/or gentrification measurement systems to look further into during our research phase (ex: Urban Displacement Project; Puget Sound Regional Council, National Neighborhood Indicators Program). The term "gentrification" is used throughout the literature review and subsequent research findings because that is the term most commonly used in the field.

We then began contacting practitioners in the field for interviews. We prioritized interviewing people who, in our eyes, had worked directly on reports that measured displacement. We interviewed two former staff members from the Metropolitan Area Planning Council (MAPC) about their work with the City of Somerville, MA on the Green Line Extension, and two current staff members from the Center for Urban and Regional Affairs (CURA) at the University of Minnesota about their work on the Blue Line Extension and evolving work in the displacement field. Other practitioners and academics declined interviews or were unresponsive (see Appendix 3 for full list of people contacted).

5.1 Literature Review

5.1.1 Gentrification, Displacement, and Neighborhood Change

Since as early as the 1970's, researchers across the nation have recognized the need to measure neighborhood change. After all, how a neighborhood changes in response to shifting demographics, policy initiatives, and rising inflation greatly affects every aspect of human life, even down to health outcomes. However, despite the apparent need, researchers rarely agree on how, exactly, to measure neighborhood change.

The main issue is that, in order to measure something, it must first be defined. Classically, researchers have focused their attention on gentrification, as it is widely considered a catalyst for neighborhood change. Many attempts at quantifying gentrification have been made over the years under a variety of names (e.g.: neighborhood change analysis, gentrification index, housing market index, neighborhood vitality index, at-risk indicator). The early toolkits used in the 1980s and 90s have fallen out of use, possibly due to lack of maintenance or too heavy of a reliance on philanthropic funding (Chapple & Zuk, 2016). Only in recent literature (2010's and later) has the topic of displacement started to be addressed, although there are limits

to what researchers can accomplish in measuring displacement. Newer reports have also begun adding the dimension of time, adding complexity to the analysis (Chapple & Zuk, 2016).

While some of the better research makes the distinction between gentrification and displacement while still analyzing both, most does not. In many cases, especially older literature, the term "displacement" is often used interchangeably with "gentrification", despite the concepts having important distinctions.

Expanding on our definition of displacement (see Glossary), displacement occurs when a household is forced to move by conditions affecting the affordability, safety, or desirability of either their dwelling or the surrounding area. This is important to consider, as most research into displacement focuses exclusively on housing affordability. But there is more behind people's decisions to live in certain areas than simply price. It is also important to note that the above definition applies primarily to residential displacement, rather than business or cultural displacement. While residential displacement is a primary concern for cities hoping to address rising housing unaffordability, taking a broader look into the overall health of the community should be considered.

Displacement can be a result of gentrification, but may also precede it (Chapple & Zuk, 2016). Additionally, within gentrifying neighborhoods, displacement is not the sole mechanism driving demographic change. Displacement can, and often does, also occur in non-gentrifying neighborhoods as well. To truly understand residential displacement, it must be evaluated under the lens of migration studies (Reardon et al., 2014).

There are three recognized types of residential migration: turnover, replacement, and displacement. Turnover represents the natural movement of people in and out of a geographic region due to circumstances unrelated to housing affordability (ex: getting a different job). When natural turnover is occurring, demographics within the region will stay relatively stable – in other words, the characteristics of in-migrants will be roughly the same as the characteristics of out-migrants. There is no defined rate that would be considered "natural" for any given city, but if the demographics are staying stable, it can be assumed that conditions within the region are staying the same.

Replacement occurs when the composition of out-migrants remains the same, but the types of people moving in have different characteristics from those leaving. In other words, the same people who would have left the region under natural turnover conditions are leaving, but demographically different people are replacing them. In this condition, overall demographics will change, making replacement difficult to discern from displacement. The main distinction between replacement and displacement is that, under replacement, the out-migrants are not under any pressure to leave.

Displacement, like replacement, occurs when the out-migrants are being replaced by in-migrants who have different demographic characteristics from them. Displacement also implies an out-migration rate that exceeds the natural turnover rate – but again, without a definitive rate, this can be a very loose measure.

There are a variety of mechanisms by which displacement can occur, as summarized in Table 3. "Forced" displacement refers to an involuntary move made by a household, whereas "responsive" indicates a household chooses to move away. In both scenarios, the household would not have moved away if not for the direct, indirect, or exclusionary causes. Only some of these mechanisms are within the control of the local government to affect. Condominium conversions, for example, can present a significant risk for displacement, especially around transit-oriented development. Condominium conversion is the process by which previously rented condos/apartments in multi-family buildings are put up for sale to individual owners. City policy can help or hinder this process within the constraints of city geography. When possible, new construction is an effective deterrent against condominium conversions and the subsequent displacement that can occur (Reardon et al., 2014).

Table 3: Categories of Displacement (Zuk et al., 2017)

	Forced Moves	**Responsive Moves**
Direct Physical Causes	• Formal eviction Informal eviction (e.g., landlord harassment) • Landlord foreclosure • Eminent domain • Natural disaster • Building condemnation	• Deterioration in housing quality • Neighborhood violence or disinvestment • Removing parking, utilities, etc.
Indirect or Economic Causes	• Foreclosure • Condo conversion	• Rent increase • Increased taxes • Loss of social networks or cultural significance of a place
Exclusionary Causes	• Section 8 discrimination • Zoning policies (restriction on density, unit size, etc.) • NIMBY resistance to development	• Unaffordable housing • Cultural dissonance • Lack of social networks

Expiration of subsidized rental apartment agreements also poses serious displacement risk. In some jurisdictions, state or local law allows landlords to enter into agreements to keep housing affordable for a set number of years (typically between 30 – 100 years). In return, landlords are subsidized by the difference between real rent and a predetermined rate. When these contracts expire, it is up to the owner to decide whether they renew the contract or convert the affordable units to market rate. Converting to market rate is an appealing prospect, especially when owners believe market rates will rise quickly due to gentrifying processes like new transit development (Reardon et al., 2014).

Displacement can occur independently of gentrification, highlighting the need for nuanced analytical tools to differentiate between these phenomena. While displacement is often associated with gentrification, this distinction emphasizes that displacement can occur for various reasons beyond gentrification. Therefore, research requires sophisticated methods to accurately define and measure both gentrification and displacement as separate yet interconnected processes.

5.1.2 Measuring Gentrification as a Proxy for Displacement

The vast majority of research into the topic of neighborhood change has focused on measuring gentrification rather than displacement for one simple reason: measuring displacement directly is extremely difficult, if even possible. Gentrification is, by comparison, a much more feasible proxy measure for residential mobility, although it is not without its flaws. Measuring gentrification typically falls under a "rules-based" or "data-driven" approach, with rules-based being more common due to its relative simplicity.

Rules-based Approaches

Rule-based measures (typically) involve categorizing areas into either high or low percentage of low-income residents, and then "scoring" high percentage areas against set "indicators" to determine their risk of gentrification (Firth et al., 2020). After initial classification as gentrifying or not, tracking these indicators over time is one of the only measures of neighborhood change currently available. Studies of gentrification are based on the assumption that rules-based models can accurately determine which neighborhoods have experienced gentrification; however, the data does not support this. The selection of indicators for classifying and tracking neighborhoods undergoing change is not standardized, and this inconsistency leads to serious concerns about the validity of any classifications (see Appendix 6 for examples of common rules-based approaches to measuring gentrification). There are a

Displacement pressures are likely to be strongest on people with chronic instability in their housing situation or on new residents to an area.
- *(Easton et al., 2020)*

wide range of possible indicators that can be used, and which ones are used is a discretionary choice often informed by data access constraints. Other predictors of gentrification include adjacency to higher priced areas, historic architecture, good access to transit, large housing units, and more than 50% appreciation in housing sales prices over a 5-year period (Chapple & Zuk, 2016).

Depending on which indicators a researcher uses, vastly different stories of gentrification can unfold in the same geographic area. For example, Seattle is well known for its high risk and rate of gentrification, but when measured under three different gentrification models, the models only agreed upon one tract in the city as having undergone gentrification between 2000 and 2010 (Firth et al., 2020). The story on the streets is often poorly represented through data sources that are easily accessible, with gentrification and displacement likely to be underrepresented in official data sources (Chapple & Zuk, 2016). This holds true for cities like New York and Philadelphia, where researchers show vastly different maps of gentrification depending on which indices are utilized. Inconsistency in indicator choice is a significant issue for validity, and resultantly, policy outcome. If a government relies on gentrification indices or other methods of measuring displacement risk without having valid criteria to assess said risk, they may entirely miss the problem.

"Our empirical analysis of Philadelphia showed unambiguously that how one defines gentrification crucially affects which and how many tracts are identified as having undergone gentrification, and which characteristics of those tracts appear to hold the greatest explanatory power for such changes. The sensitivity of these important conclusions to both the definitional criterion used and the stringency with which it is applied is apparent. (Galster and Peacock, 1986: 333–334)"

The same is true for Tacoma, as shown in Figure 9. Using the Gentrification Comparison Tool, developed by Enterprise Community Partners, one can get an overview of how census tracts in Tacoma would be classified under three prominent gentrification measurements. Depending on the indicators used, a vastly different picture of gentrification is portrayed, with some measurement indices potentially over or under-estimating future gentrification. This figure also illustrates the potential for errors classifications: two of the three models highlight the most southern-left census tract as "eligible for gentrification," but the Freeman model does not.

Some rules-based models make distinctions between various stages of gentrification (i.e. gentrification potential vs already gentrified) or choose to focus on a regional rather than municipal scope. Rules-based approaches are almost exclusively conducted by comparing only two points in time, and generally take the form of one-off reports or online guides (Chapple & Zuk, 2016). Rules-based approaches are generally restrictive and rarely capture the full picture of neighborhood change. They often ignore historical, financial, political, and social neighborhood perspectives.

Figure 9: Tacoma's Census Tracts Under Different Displacement Models (Enterprise)
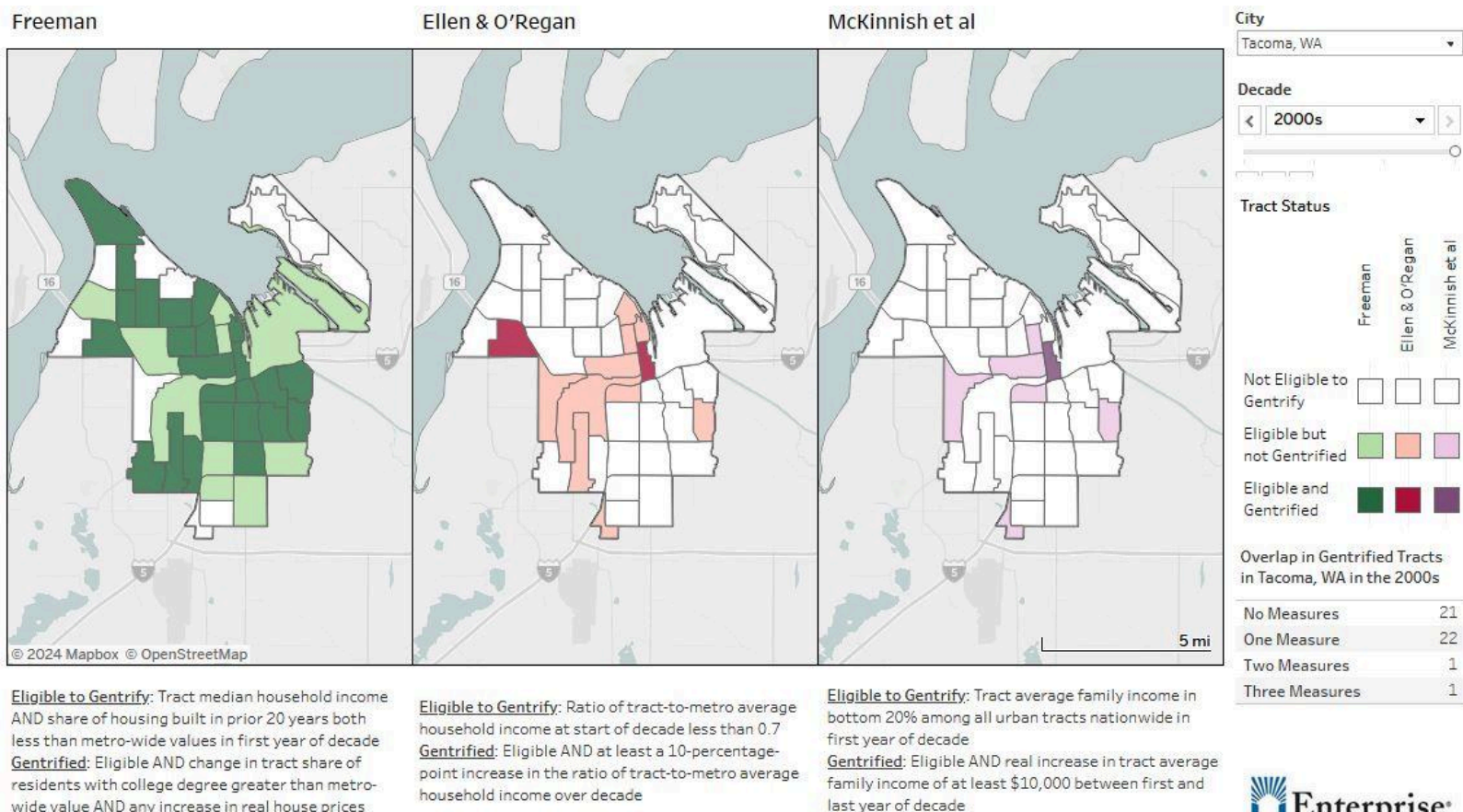
Some of the difficulties in measuring displacement are: consistency in measurement criteria, spatial misclassifications, and issues gathering relevant data. Often, the data necessary for measuring displacement either doesn't exist or is difficult to collect. Most measurement tactics involve utilizing census data to track indicators, which can provide insights but lacks the nuance to depict a clear picture. For example, census data can result in spatial misclassifications, where the boundaries of the census don't align with relevant areas for gentrification or with locally defined neighborhood boundaries. Boundaries are also subject to change over time, making long term analysis difficult (Easton et al., 2020). In addition, many of the driving forces behind gentrification and/or displacement are hard to quantify. When data sources are available, problems with data collection can hamper usefulness of the data. In some data sets, data is not gathered frequently enough, databases are not maintained, or data collected does not accurately capture displacement pressures. See Appendix 6 for a list of indicators often used and Appendix 5 for recommendations on potential ways to improve data collection and research design.

Census data also contributes to temporality concerns because of the timeline of when census data is collected. If gentrification or displacement occurs more rapidly or between census collection points, then relying on census data can underrepresented or entirely fail to measure correctly. Census data also may not collect the right information. The timing of measurement is crucial and hard to do right. The economic position of households is never static – people cycle in and out of poverty all the time. The concept of "duration dependence" also comes into play when measuring displacement.

> **Duration Dependence:** *refers to the likelihood of a household moving out based on their length of residence. The basic theory concludes that the risk of moving is sharpest and peaks early on, and then decreases over time. This generally is believed to happen due to people developing ties with their neighborhoods, enticing them to stay put if they are able.*

Length of residence is also thought to impact a landlord's propensity to inflate rent to unaffordable levels (Easton et al., 2020). Thus, displacement pressures are likely to be strongest on people with chronic instability in their housing situation or on new residents to an area.

Gentrification and displacement can look vastly different across cities and even within cities. For example, some neighborhoods within a city might view gentrification as the influx of an "arts and culture" scene, whereas for another neighborhood it may look like the influx of chain restaurants driving out local businesses, or transit oriented development increasing property values and rent (Firth et al., 2020). Because gentrification and displacement looks different everywhere, finding the correct indicators is one of the biggest challenges. Census data allows for a modicum of standardization across models, but even still, no two models use exactly the same indicators. The challenge to cities looking to measure displacement, then, is how to select the indicators that are relevant for their context. Better models might incorporate the "smart cities" data-driven movement, discussed in 5.1.4 of this report (Chapple & Zuk, 2016), and community input (Firth et al., 2020), but such models would be resource intensive.

Data-driven Approaches

The most common data-driven measures expand on rules-based measurement approaches by analyzing more data. Principal component analysis, a statistical method, has been used in some research to condense multiple factors of gentrification into a binary variable that can be then used in regression analyses (Easton et al., 2020). Data-driven approaches also can work by comparing cross sectional census data or by conducting time-series analyses (Firth et al., 2020).

While data-driven approaches can be on the cutting edge of research, they often rely on the same data sources as rules-based approaches, and thus fall prey to many of the same challenges and validity issues. On top of that, data-driven approaches are typically not

generalizable to other contexts due to their limited scopes. However, if done properly, they may be more useful than rules-based approaches because they can analyze more complex patterns. Within neighborhoods, there are complex ranges of possible relationships between social and environmental factors that drive gentrification and displacement that rules-based approaches cannot fully encapsulate. Data-driven approaches may also be able to better predict future change (Easton et al., 2020).

5.1.3 Measuring Displacement via Interviewing

Interviewing residents on their decision to move has been utilized in a few research studies, and is probably one of the only true measures of displacement currently available. In one early study, a researcher attempted to gauge residential displacement in Seattle in the early 1980's through interviewing. His research, although measuring displacement directly, had two major limitations: there were no real comparison cities (or previous data from Seattle) to use for development of a baseline displacement rate to use for analysis, and his sample size was not large enough to conduct statistical analysis, making causal relationships difficult to establish. Due to issues with having no comparison group to determine a "baseline level" for displacement, better research would count the number of people forced out of their neighborhoods via longitudinal interviewing – this is a form of migration studies.

> **Longitudinal Interviewing:** *A qualitative research approach that involves interviewing people multiple times over a research period of years to track changes in the research subjects. Longitudinal studies require keeping track of research participants through changes in life events, such as residential moves, making them more difficult than point-in-time interviewing but especially useful for migration studies.*

Longitudinal studies are unfortunately some of the most difficult to conduct, both in time and resources, resulting in their underuse in research and practical settings. There are other drawbacks to this approach, as well. If interviewing is done retrospectively, people may rationalize their decisions and thus lead to inaccuracies in the data. For example, if someone did originally get displaced due to financial reasons, but their new neighborhood is treating them well, they may rationalize after the fact that they moved because they wanted to, rather than because they had to. Another issue with longitudinal studies is following though over the years: attrition rates tend to be high, especially when tracking households moves. Households may also be averse to participating in official surveys, or people may double up. All of these problems add complexity to an already complex task (Easton et al., 2020). However, interviews or surveys, despite their challenges, can measure displacement directly, unlike the other measures that approximate it via other variables.

There are also some aspects of displacement that we will likely never capture, and thus even good measures will under-represent the amount happening in any geographic area. For

example, we cannot measure all the efforts and sacrifices people make to remain in their homes, nor the limitations that moving has on future residential choices. We also have no easy way to examine the psychosocial ties that bind people to places, even after residential displacement occurs (Easton et al., 2020).

5.1.4 Smart Cities Movement

There is a growing call for more data-driven, crowd-sourced, and continuous measurement processes, but limited ability to maintain any processes developed (Firth et al., 2020). Academic institutions have been the primary powerhouses behind measuring displacement, but with limited and fickle funding sources these measurement tactics often get abandoned. Some claim the proper place to house and maintain these tactics naturally lies with city or regional governments, but finances again become an issue.

Within governments and nonprofits doing anti-displacement work, displacement and gentrification reports are often a "one-off" report used in strategic planning or resource allocation in government. Governments generally do not have the time, resources, or potentially even interest in maintaining a robust measurement system. This is especially true when the value of these systems cannot be quantified. Gentrification and displacement measurements have been used to spur action towards creating policy, but it is impossible to know if these policies would have been adopted without the data to spark the conversation. Additionally, as noted above, measurement tools have proved lacking in predictive power and validity. Some of the most robust models can predict gentrification accurately up to 85% of the time, but they also often yield false positives (i.e. areas flagged for risk of gentrification ended up not gentrifying) (Chapple & Zuk, 2016).

The data movement is new, evolving, and has room for improvement. The concept of "smart cities" may have sparked the conversation of housing data analytics within governments, but emerging literature and organizations provide a different opinion on how to best maintain the data sources necessary for displacement measurement.

> **Smart cities movement:** *Initiatives within local governments to make cities more efficient and responsive to constituents. Cities with "smart data" movements primarily focus on digital tools that collect and analyze user-submitted data, allowing for real time monitoring and control (Chapple & Zuk, 2016).*

The primary goal of "smart cities" is to increase efficiency in government response, rather than increase equity, making the movement antithetical to anti-displacement strategies at a glance. However, combining early warning systems and gentrification indices with the smart cities movement could strengthen both – by adding efficiency and data access to gentrification mapping, and by providing the smart cities movement approach a focus on equity (Chapple & Zuk, 2016).

5.1.5 Case Studies

Although many cities follow a similar general framework for measuring displacement, each city differs slightly in the indicators they chose. Some cities measure displacement by considering rental and housing costs, education attainment, race, etc., while others omit race and education attainment from their indicators. Below, we briefly summarize the indicators and factors considered by Los Angeles, CA and Seattle, WA when measuring and monitoring gentrification and displacement. For further consideration, one can also look to Portland, OR and Philadelphia, PA's anti-displacement tactics - these are not included in our studies due to time constraints.

Los Angeles, CA

Los Angeles Index of Displacement Pressure

In 2016, Los Angeles, in partnership with the Urban Displacement Project and with support from Bloomberg Philanthropies, created the Los Angeles Innovation Team (i-team) to tackle the problem of quantifying displacement. The i-team created two indices: **The Los Angeles Index of Displacement Pressure (LAIDP) and the Los Angeles Index of Neighborhood Change (LAINC)**. These indices show, through GIS maps, where gentrification is overwhelming neighborhoods or where displacement and gentrification are taking place.

LAIDP: This index predicts displacement for Los Angeles and San Diego counties. The index used ACS data from 2012 - 2015 as the basis of the original analysis, but it is unclear how often it is updated. The i-team suggests updating it annually, but it appears in practice to update based on ACS data in five year increments (ex: currently using data from 2015 - 2020) (McDonald, 2021). The maps are still active and show which census tracts are at risk of gentrification. The index is the result of a comprehensive analysis of seven key measures outlined in Figure 10. Appendix 7 shows the criteria the LAIDP uses to classify whether a neighborhood as gentrifying or not, and which stage of gentrification it is undergoing.

The LAIDP is a tool policymakers, urban planners, community organizations, researchers and activists can use in understanding and addressing displacement pressures in Los Angeles County. By quantifying displacement risk and identifying vulnerable neighborhoods, the LAIDP can allow stakeholders to prioritize interventions and allocate resources to mitigate the negative impacts of gentrification and urban development. However, analysis of the data is dependent on the public (McDonald, 2021).

LAINC: The neighborhood change index evaluates the extent of gentrification in Los Angeles neighborhoods by analyzing data from 2000 to 2014. It ranks 111 neighborhoods (based

on ZIP codes), with the top-ranking neighborhood experiencing the most gentrification ("very high change") and the lowest-ranking neighborhood experiencing the least ("no change"). The index relies on six demographic measures indicative of gentrification. These include changes in IRS filer ratio (see Glossary), median household income, median gross rent, percentage of white residents, percentage of residents with a college degree or higher, and average household size. See Appendix 8 for a summary of the latest results of the LAINC.

Figure 10: LAIDP Indicators (LAIDP)

Change Measures
"Change factor measures are those that suggest future revitalization is likely due to investment, projected housing price gains, and proximity to recently changed areas." (LAIDP)
Transportation investment   - Distance to current rail stations   - Distance to rail stations under construction   **Proximity to rapidly changing neighborhoods**   - Distance to closest "top tier" changing neighborhood (based off Los Angeles Index of Neighborhood Change)   **Housing Market**   - Change in housing price projections from 2015 - 2020
Displacement Pressures
"Displacement pressure factors capture areas with a high concentration of existing residents who may have difficulty absorbing massive rent increases that often accompany revitalization." (LAIDP)
- Percent of households that rent   - Percent of households that are extremely rent burdened (pay over 50% of household income on rent)   - The number of affordable housing units set to expire by 2023

Seattle, WA

Seattle's approach to addressing urban gentrification and displacement involves a comprehensive **Displacement Risk Index**, which is a part of the city's upcoming 2035 Comprehensive Plan. The index includes 14 variables such as race, linguistic isolation, education, housing tenancy, income levels, and proximity to various urban amenities (see Appendix 9 for full list). It aims to assess the risk of displacement for marginalized populations by considering factors like:

- **Vulnerability:** This refers to the susceptibility of populations to housing cost increases and the likelihood of facing discrimination or structural barriers in securing new housing.
- **Amenities**: These are elements that increase real estate demand, such as access to transit, proximity to core businesses, and location near gentrifying or affluent areas.
- **Development Capacity**: This measures the potential for future development under existing zoning laws, indicating possible locations and scales of development, though not predicting the timing.
- **Median Rent:** By comparing local median rent to the citywide average, this can indicate how new market-rate developments might impact current rent levels in the area.

While it provides a robust framework for understanding residential displacement risks, it notably does not account for the displacement of businesses or cultural organizations, which also face significant challenges from urban development and market pressures. This tool is crucial for the city's planning and policy-making, as it helps identify areas where interventions are needed to support at-risk communities. The report also makes clear the limitations: the index is a "snapshot in time," and cannot predict what the future will look like.

Seattle also adds to the narrative with an "access to opportunity typology" - instead of focusing on "outcome" variables as other studies have done, it focuses on place-based determinants as a broader measure for long term planning. Seattle "considers marginalized populations' access to key determinants of social, economic, and physical well-being. Access to economic opportunity depends on not only physical proximity to quality jobs but also the ability to attain the skills and experience needed to acquire such jobs" (Seattle Office of Planning and Community Development, 2016). The "access to opportunity" indicators (see Appendix 10) measure resources people need to thrive, but these same resources promote private development and can accelerate gentrification. Indicators such as access to transportation and jobs can also increase the potential for displacement in neighborhoods where they score highly on such indicators. The intersection of displacement risks and access to opportunity provides a more complex and comprehensive analysis of neighborhood change factors than other indexes have attempted.

5.2 Findings

5.2.1 Introduction

Measuring displacement/gentrification is often conducted by non-profits or research institutions in conjunction with or at the requests of local governments, such as MAPC's work with the City of Somerville on the Green Line Extension, or CURA's report on the Blue Line Extension in the Twin Cities. Often, new or expanded transit lines spur the interest or necessity of mapping displacement, as new transit is a well documented catalyst for gentrification and

subsequent neighborhood change. The addition of transit creates vulnerability in lower socio-economic communities, which are often the most transit dependent households. Paradoxically, bringing transit to underserved communities often has the opposite of the intended effect of bringing opportunity to neighborhood residents. Although transit brings neighborhood opportunity, the resulting displacement pressures often force out the target population of the transit program. Transit dependent households involuntarily move farther from the new transit, and are replaced by wealthier residents who are less likely to utilize the transit that gentrified the neighborhood. This can result in lower-than-expected ridership for new transit, as well (Johnson et al.).

The most common motivations behind implementing a displacement measuring strategy are community concerns and government strategic priorities. This is especially the case for CURA's work. After almost a decade of community challenges regarding transit related displacement pressures, Hennepin County and the Metropolitan Council initiated an anti-displacement initiative and contracted CURA to create an anti-displacement strategy, recommendations, and working group. CURA's approach to developing their strategy was heavily dependent on community input. Being part of the University of Minnesota, CURA has a reputation for being an unbiased and trusted community partner. Community organizations would come to CURA with concerns about changes they noticed in their areas – when strong patterns emerged in the concerns being voiced, CURA would set those as a priority for investigating (Johnson & Damiano).

In MAPC's case, the Green Line Extension (GLX) was a highly collaborative effort amongst a whole consortium of Boston-area governments and community organizations. The primary motivation behind mapping and attempting to predict displacement in this case was the history of previous transit infrastructure projects creating significant displacement. The purpose of the broader efforts around the GLX was to support the City of Somerville with housing policy in the city beyond simply transit areas and get previously disconnected policy areas, such as housing and transit, working in tandem towards the same goals. The idea behind this was to build a foundation for collaboration across agencies, municipalities, and departments that would extend past MAPC's involvement.

"The project was done very intentionally under the umbrella of sustainable communities, which was this very broad multi-sector consortium… [It] had an advisory group that was spread across a lot of different interests, including some stakeholders that didn't always see eye to eye with city policy on housing. Part of what MAPC was trying to do was create a shared set of understanding about the scale of the problem so that all those stakeholders could have a more productive dialogue with each other after MAPC left the conversation (Johnson et al.)."

5.2.2 Qualitative Data - "Truth-Grounding"

Our findings indicate that measuring displacement with currently available tools is next to impossible. However, measuring and mapping gentrification as a proxy for displacement in the way the City of Tacoma has done is up to par with best practices.

Echoing the literature on the subject, our interviewees endorsed conducting qualitative research as an effective but arduous method. The time and effort necessary to conduct statistically robust qualitative research is often outside the capacities of nonprofits and governments, leading most displacement researchers to choose mainly quantitative approaches (Johnson & Damiano). However, qualitative data adds context and nuance to existing sources of quantitative data and can help fill in the gaps where quantitative data fails to capture the full picture. Although we can look at census data at macro (ex: regions) or meso (ex: cities) scale, it cannot and should not be viewed in isolation.

"A lot of what we end up having to do is kind of speculate or look at macro level data and say, 'Oh, well, you know the Black population in this census tract dropped by half – which is something that has happened in Minneapolis before. Is that because of gentrification? Did people just want to move? Were they forced out? We know we can't prove it either way. We can look at the effects, and say this is something that has happened over the last 10 years, but we can't add in the circumstances (Johnson & Damiano)."

The Urban Institute, one of the largest organizations in the country concerned with anti-displacement research and policy, heavily emphasizes grounding quantitative data and analysis with street-level conditions: in other words, working directly with the community is crucial to illuminate and provide context on the quantitative data. Colloquially, using qualitative data to supplement and contextualize quantitative data is called "truth-grounding" or "grounding in truth." CURA's work, although predominantly based on quantitative data, was heavily grounded by community understanding due to CURA's organizational values.

Most displacement measurement tools take the form of indices, typically utilizing census data as their set indicators of gentrification and displacement pressures. Unfortunately, these indices cannot accurately capture true displacement, at least not on their own. True displacement is extremely hard to quantify with existing data sources. To truly map displacement, we would need micro-level data about peoples' migration choices (Johnson & Damiano). Existing indices and indicators cannot directly measure displacement, but can give an idea of which areas are at risk of gentrifying and experiencing possible future displacement.

MAPC's report on the GLX did not truly measure displacement, instead focusing on predicting gentrification effects based on previous transit development and setting a theoretical framework for how to think about migration and indicators for future research. Important to this

framework was the concept of "turnover rates" of residential migration. Residential turnover in a city is guaranteed to happen, and isn't necessarily bad – some households are naturally more mobile than others. Turnover becomes a problem when a household experiences housing instability due to low incomes, unsafe or unstable rental situations, or predatory landlords, to name a few conditions. Additionally, turnover can occur in neighborhoods that appear to stay the same demographically if the people being forced out of the neighborhood are being replaced by families that are demographically similar. This makes turnover extremely hard to measure with census data, again leading back to the necessity of qualitative or otherwise community gathered data. However, turnover itself is not a problem – lack of choice and opportunity within a neighborhood is. In some cases, turnover can even be a good thing: if a household has the opportunity to move to a more affordable location, that may look like displacement in the data, but is a net positive for that household. Ultimately, what is most important is creating and maintaining affordable housing availability and residential choice (Johnson et al.).

5.2.3 Predictive Power

Policy makers and city officials are often interested in being able to predict future changes, and for noble reasons. City government is often described as slow to change and reactive rather than proactive, and being able to make informed predictions on future conditions would be revolutionary. Unfortunately, our findings suggest that this goal is not achievable for displacement measurement with current data structures. The predictive power of current displacement measures are weak due to lacking real-time or community-sourced data. As described previously, qualitative/community-sourced data helps"ground the truth" of quantitative data and fill in knowledge gaps in displacement indices. Predictive power might be improved by incorporating more community-sourced data into indices by creating or improving upon ways residents can report geographic specific content (Chapple & Zuk, 2016).

However, it may not be advisable to pursue even if the appropriate data and data analysis techniques existed. If one were able to predict the future and say that a particular neighborhood is going to be significantly revitalized, it could spur speculative investment in that neighborhood. Speculative investment is especially prevalent in the development of new transit corridors (Reardon et al., 2014). This investment, regardless of whether the prediction was correct, will artificially inflate rents and housing prices in neighborhoods, leading to gentrification and potential displacement. Determining what caused the effect is a "chicken or the egg" conundrum, but artificial provocation of gentrification can be avoided if predictions about areas of revitalization are not made.

> "The implications of gentrification scholars trying to predict possible trajectories of neighborhood change by looking at the process could well be exploited by those in search of rent gaps; indeed the ethical implications have yet to be debated (Easton et al., 2020)"

There is always going to be tension between governments trying to do proactive interventions to address social problems and the drivers behind social problems attempting to capitalize on opportunities. Proactive interventions for displacement without predictions of where displacement is likely to occur can be accomplished, but these geographically untargeted interventions are typically costly and difficult to implement (Johnson et al.). Additionally, assessing program implementation is yet another cost, and is very difficult to get a true answer on. Causal relationships are extremely difficult to establish between program and program outcomes in city-wide experiments, but creating targeted experiments (to establish causality) can lead to equity issues if the program is found to be effective for target populations. Additionally, even the act of proving a program is effective is riddled with challenges. An absence of displacement does not necessarily mean a policy is working effectively if the target group was not at risk of displacement in the first place.

A potential way to utilize prediction without increasing the possibility of real estate speculation is to develop scenarios and do cost-benefit analysis based on comparison to the "do-nothing" scenario. Developing multiple scenarios, without attaching real world rent speculations to them, can be meaningful to policy makers in understanding how their communities may change and help them make informed decisions and justify policies to constituents (Johnson et al.). Additionally, measuring and creating scenarios for gentrification can have significant impact on community organizing, and can be helpful for getting momentum around catalyzing community engagement, especially around concrete/capital projects (eg: Twin Cities Blue Line Extension) (Johnson & Damiano).

5.2.4 Indicators and Existing Indices

Basing displacement measurement techniques off current gentrification indices, our interviewees recommended using the following indicators:

- Changes in college education
- Changes in home prices
- Changes in rent

Changes in college education and home prices are the top two choices due to their strong correlation with socio-economic neighborhood conditions, their stability compared to other indicators, and the availability of data sets gathering this data (Johnson & Damiano). Rent values are important, but data sets containing up to date information are limited and expensive to access. An important caveat is that, as a field, little is known about which indicators truly matter for forecasting displacement and whether those differ from place to place (Greene & Pettit, 2016). The above indicators typically matter for every locality, but it will be important to determine which indicators are priorities for Tacoma's unique landscape. See Appendix 6 for

some common indicators for analyzing gentrification and displacement as well as potential data sources for the indicators.

Of existing indices, the Federal Reserve Index was identified as being the best and could probably be used as a stand-alone index for future gentrification mapping for any jurisdiction. One reason stated for this is that the Federal Reserve Index tracks college degree attainment. As stated above, college degree attainment is possibly the most important indicator because of its stability in capturing socio-economic status (and thus being able to control for socio-economic status in regression analyses). Indices that focus on income as an indicator of socio-economic status can miss the big picture in census data, due to the large time frame between data captures. People can cycle in and out of poverty at an alarming rate, and census data can miss these changes depending on the timing of the data collection (Johnson & Damiano). In other words, the census data, while useful for tracking many indicators, can obscure real trends. College degree attainment, on the other hand, is a binary variable – one either has a degree, or does not – and typically indicates a higher socio-economic class, especially in the long term.

> As a field, little is known about which indicators truly matter for forecasting displacement and whether those differ from place to place.
>
> - (Greene & Pettit, 2016)

5.2.5 How Often to Measure

How often to measure displacement depends on the data sources available, indicators chosen, and staff capacity. The general advice is to measure no more frequently than once a year, and no less frequently than every five years. Every five years would keep an organization in line with census and American Community Survey (ACS) data timelines, but can be too infrequent to capture accelerating displacement trends (Johnson & Damiano). Measuring at this timeline can, however, allow time to capture any changes resulting from policy initiatives to be reflected in the mapping (Johnson et al.). Measuring more frequently than every five years will require some other source of data, ideally administrative data or community sourced data (Johnson & Damiano).

5.2.6 Resources Required

To do the complex statistical analysis and report writing necessary to quantitatively measure displacement requires a strong data foundation, and significant staff and financial resources. Our interviewees estimated that a very experienced and knowledgeable person could theoretically create a report in one – two months of full time work. They would need to be familiar with GIS and ACS/census data. If there were two to three staff members working on the project, a comprehensive report could be put together in two to three months of part time work

(Johnson & Damiano). If a city wanted to maintain an indicators system, rather than create a one-time report, it would be prudent to hire a full-time staff member just to keep the tracker up to date. Our interviewees cautioned against assigning this task as a part of someone's existing role. According to people currently doing the work, it is difficult for a staff member to keep an indicators program up to date as just part of their role, as the programs tend to get pushed to the back-burner as more pressing deadlines on other projects occur (Johnson et al.).

Besides staff, the main cost is data acquisition. A simple version of an indicators program could probably be built using just city/county administrative data, but a more robust version will require consumer data. Consumer data can be prohibitively expensive to acquire, and typically has to be renewed on an annual basis (Johnson et al.).

Time-wise, working on an indicators program alone will be the fastest way, assuming there is staff capacity for it. However, this is not a process that should be attempted in isolation. Working with partners may prolong the process, but will result in a better program (Johnson et al.). Getting out into the field and ground-truthing indicators with community needs is essential.

"You wouldn't want to do this behind a desk. You want to do it in the field with people and ground the truth of the information you're seeing and have real conversations about which data points matter and how to frame them (Johnson et al.)."

5.2.7 Sources of Data

As stated above, administrative data alone can suffice in dire circumstances, but ideally an organization will want to get access to both administrative data, census data, and consumer/community data.

In an ideal world, rental registries would track rents in different buildings. Rent is one of the hardest data sources to track. Homes have values that are publicly available and easy to investigate on real estate sites such as Zillow or Redfin, but similar information about rent is not available. Scraping data from websites like craigslist, padMapper, or Zillow can help fill in the administrative data gaps and provide insight into current market availability rather than only the occupied units. This is especially useful for getting information about the state of affordable housing outside of developer designated affordable housing (Reardon et al., 2014). In addition, a city needs to also assess what affordable housing means for their community. For example, in Montgomery County, the average rent is affordable for people in the 70-80% AMI range – in other words, it is affordable to low-income households. Thus, Montgomery County can focus their affordability measures on even lower AMI ranges. But, if average rent exceeds affordability for 100%+ AMI, then measures might need to be taken to address groups not typically classified as at-risk for housing insecurity.

On top of this, to truly measure displacement, we need information on migration patterns and qualitative data on decisions to move. Currently, there are some consumer and government data sources that can be used as proxies for migration, such as PSID (Panel Study of Income Dynamics), Infutor, and Federal Reserve data. Some of this data tracks people via credit scores, and others via postal changes in address. But none of this data collects reasons for moves, leaving important context out.

Other data used in the past to measure displacement includes the ACS, PUMS (Public Use Microdata), and CHAS (Comprehensive Housing Affordability Survey). PUMS is limited to census tracts of at least 100,000 in population, and CHAS is limited in scope to city level, rather than census tract level, making them useful only for certain areas.

Table 4: Examples of Available Data Sets Used in Displacement Research

Data Set	*Public or Private Data*
ACS	Public
PUMS	Public; limited to large municipalities
CHAS	Public; limited in scope to city level
Federal Reserve Data	Public
PSID	Public
Infutor	Private; licensing fees apply
Real Estate Sites (ex: Craigslist, Zillow, etc)	Private
Consumer data (ex: cell phone location data)	Private; difficult to acquire and ethical concerns exist in usage

The move to get better data can be accomplished, but perhaps not by government entities. The National Neighborhood Indicators Partnership (NNIP) provides guides for how communities or people interested in data can get started in developing a data intermediary in their community. Their guides cover the stages of moving from raw data to effective community change, and becoming a partner organization provides access to learning opportunities from affiliated organizations in other localities across the country (Hendey et al., 2016).

NNIP suggests several administrative data sets that can be good starting points for analysis. Data from 311 calls can be used to assess resident concerns, for example. Permit data can provide insight into neighborhood economic vitality and the overall composition of businesses. Code violations can indicate owner interest (or disinterest) in investing in their

properties, thus indicating neighborhood value. Postal data can track moves in and out of zip codes.

More interestingly, though, consumer data and crowdsourced data present unique insights. Although consumer data can be closely guarded or prohibitively expensive to acquire, there are recent trends where private companies collaborate and share information with governments. For example, Uber has shared ridership data to help cities ease congestion and mitigate greenhouse gas emissions (Hendey et al., 2016). Mobile phone providers and social media are another potential untapped source – their data could reveal trends in how residents use neighborhood amenities. Care must be taken to ensure that consumer data is produced and acquired ethically. Although most users of technology sign consent forms with data companies (e.g. "consenting to cookies," allowing location sharing, or through the terms of mobile phone or internet contracts), the average user pays little attention to the data they sign away. Governments should hold themselves to a higher standard if they choose to utilize consumer data - it is crucial that technology users are aware of their data privacy and have the option to opt out if desired.

Crowdsourced data typically involves nonprofit, activist, or local data intermediary data collection efforts, although there is no reason why a local government couldn't collect it as well. Crowdsourced data encompasses any data sourced directly from the community or other non-official source, through surveys, public websites, oral histories from residents, and so on (Easton et al., 2020). A city could improve its crowd-sourcing abilities by partnering with a local data intermediary, or by improving and increasing opportunities for resident engagement with city data collection. For example, continuously open online portals for resident feedback, based on geographic area or with a geo-tagging feature, could be used. Currently, cities that have these types of portals use them mainly for maintenance and efficiency of government purposes - Seattle's "Find it, Fix it" and Tacoma's own "Tacoma First 311" both allow for residents and visitors to provide geotagged community-sourced data, but for limited purposes. Some of the data collected by these efficiency and maintenance based portals could be used to assess potential neighborhood decline or revitalization. However, broadening the types of data these portals collect to include more qualitative and "community voice" data could greatly improve a city's ability to measure displacement.

Data sources could also be improved by allowing residents to see and engage with interactive maps, and provide their own data. For the purposes of displacement mapping, such a tool could prompt for feedback about neighborhood quality, things residents enjoy (or don't enjoy) about their neighborhood, areas for improvement, etc. It could also allow residents to report their rent, giving a city a much needed insight into real-time market rent fluctuations by neighborhood.

Figure 11: Interactive Qualitative Mapping Tool (Seattle Department of Transportation)
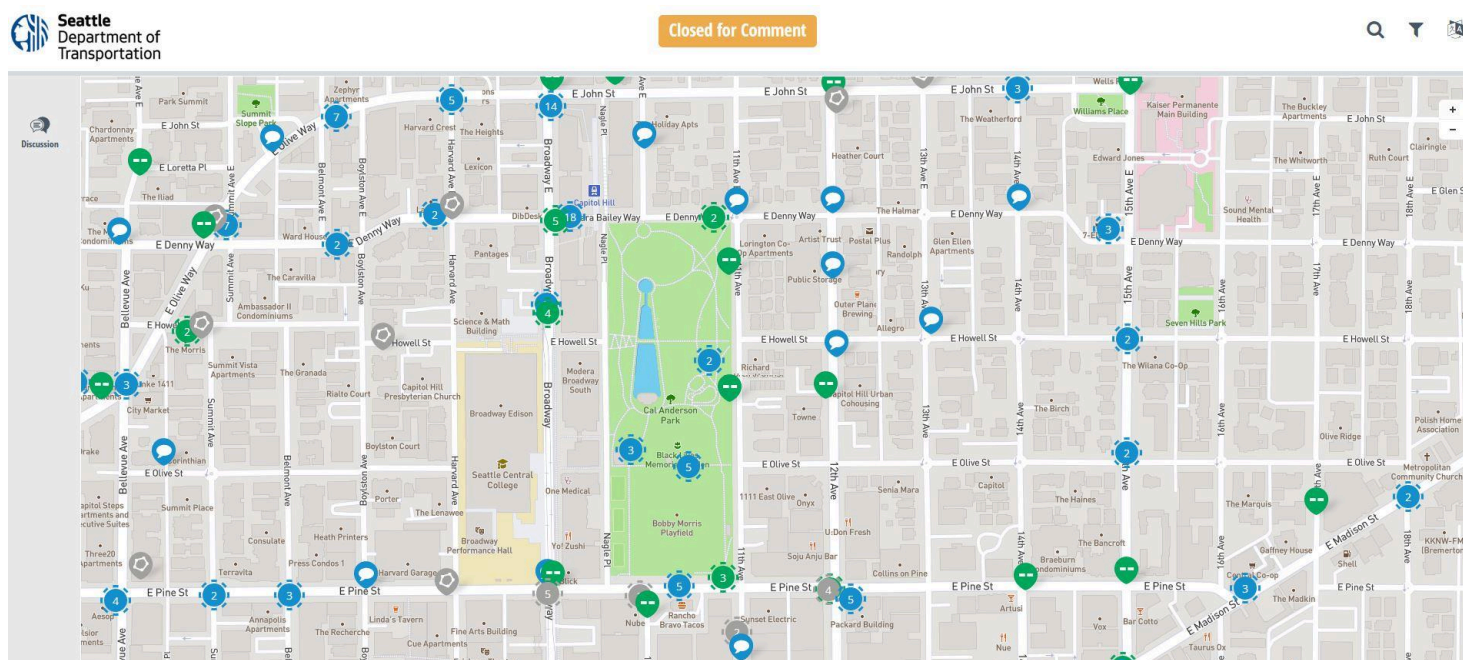
These types of interactive maps exist in many forms already. For example, Seattle used an interactive map to gather feedback from residents during the drafting of their 20-year transportation plan. Figure 11 shows a snippet from that map, highlighting that residents were able to provide qualitative feedback (blue icons) as well as suggest changes from a predefined list of improvements (green icons), such as intersection upgrades. Seattle's interactive map had a limited time for "comment," but a similar map left open for comment continuously could help address some of the gaps in displacement data from other data sources.

Figure 12: Queering the Map featuring Tacoma, WA

An example of interactive mapping from outside a government is the Queering the Map website. This site also allows users to provide geographic information alongside qualitative comments. Because the purpose of this site is to capture and visually showcase LGBT+ experiences, the site

never deletes any tagged data, nor does it showcase the date the data was input. However, due to the ever changing nature of displacement and city growth, an interactive map for displacement should both archive old data (1+ years) and capture the date of submission. **Figure 12:** Queering the Map featuring Tacoma, WA

5.2.8 Local Data Intermediaries

A local data intermediary could also help bridge the knowledge gap in administrative data and measuring displacement.

> ***Local data intermediary:*** *Compiles data for community use. Acts as an impartial and trusted source of information across many ranges of topics. This makes them slightly different from community indicator programs, which tend to be narrower in scope. However, data intermediaries can be a valuable resource for continual displacement tracking, provided the intermediary sources credible and appropriate data.*

Some places that currently have local data intermediaries managing data according to NNIP standards include Cleveland, Ohio; Portland, Oregon; and Seattle and Bellevue, Washington, among many others. Within participating NNIP partnerships, the local government very rarely acts as the local data intermediary, although they often provide administrative data to the intermediaries. According to NNIP,

> *"Government agencies may not be able to perform the full range of data intermediary functions, such as providing technical assistance to community-based organizations or supporting community-based initiatives. In addition, in some communities government agencies are seen as more likely to be responsive to current elected officials than to broader and longer-term community interests (Hendey et al., 2016)."*

As alluded to by the quote above, although governments are permanent institutions in a community, they are not always the most trusted institutions. There is also a risk that leadership transitions within government could change or eliminate a data/tracking program.Thus, local universities or other long-standing institutions with vested interest in community concerns are better choices to house local data intermediaries. The chosen institution will need strong technical capacity, a track record of community engagement, established collaborative relationships within the community, a reputation for being unbiased, and ability to acquire funding as needed. A data intermediary should expect to build their capacity and models incrementally (Green and Pettit, 2016). If such a data intermediary could be established, a city would have the necessary data foundation to enact a number of "smart cities" initiatives, including the possibility of future displacement measuring.

Any displacement or gentrification measurement tool developed out of the smart cities movement, though, should be guided by three principles currently not in practice in smart cities

movements: equity, participation, and action (Greene & Pettit, 2016). Measurement tools need to focus on equity rather than only efficiency – efficiency is a fine goal, but doesn't help to achieve the values inherent in anti-displacement work. Tools also should involve community engagement from all sectors: residents, businesses, technology firms, community-based organizations, etc. Lastly, these tools must be paired with action: pairing displacement measuring/early warning systems with actionable responses with built-in accountability mechanisms is key (Greene & Pettit, 2016).

There are some risks associated with smart cities data collection and analysis. Any predictive analysis that comes out of such initiatives could be used maliciously for speculative real estate, artificially driving further gentrification and displacement. However, speculative real estate already exists (for example: AirBnB's pricing algorithms, Green and Pettit, 2016), and having access to this data typically locked behind private company doors could help governments "level the playing field." Additionally, as one of our interviewees stressed, predictive analysis doesn't need to include numbers or prices for it to be meaningful for policy work.

Another risk is that the data will go to waste. Cities may not have the interest or flexibility to adjust their resources in response to what the data reveals. A city interested in capitalizing on the data analysis will need to have a growth mindset and be prepared to focus on future monetary savings. They will need to be able to step away from focusing on the "crisis of the day" and commit to an overarching, long-term plan that may not see monetary savings for a while (Green and Pettit, 2016).

CHAPTER 6: Commonalities Across Findings

After compiling our interview transcripts and performing a content analysis via our qualitative codebook (See Appendix 11), we were able to identify three major commonalities across the three anti-displacement initiatives covered by our research. Below we have gathered direct quotes (in italics) pulled from our interviews that provide insight into how academics and field practitioners are thinking about the implementation of anti-displacement policies.

Community: Listen to Community Voices and Incorporate Feedback

Many anti-displacement policies are initially spearheaded by grassroots movements from within a community. Members of any given neighborhood understand the needs of their specific area, so community feedback is critical throughout both the initial implementation and further refinement of any anti-displacement program.

"There is a lot of pressure from the community to, instead of having anti-displacement be like an afterthought, to be as big of a process as engineering and project planning are."

"About 95% of the developers that we work with are not for profits, they're really accountable to the community. They have community members who are engaged in their services and their volunteer work and their food pantries, whatever it is, and so their relationship to the community is close enough that community members can say, 'We know that you're gonna be building something.'"

"When we started our gentrification work, it really came from a lot of concerns from community organizations. So as a community-based research center, a lot of our research questions and the topics that we study come from the communities that we work with."

Suitability: Tailor Policies to Local Context

Administrators must craft anti-displacement programs that not only address the community concerns, but that realistically incorporate other local logistics (such as departmental capacity, displacement drivers, the local political climate, and unique cultural aspects). While our paper examines programs from across the country in order to determine best practices, all policy implementation should be localized to a jurisdiction (in this case Tacoma).

"One of the things that we included in that legislation was displacement planning such that we just don't go and build 10,000 units around the station areas and then say, 'Oh, crap' afterwards, like, 'We displaced a whole bunch of people.' We need to be planful upfront."

"...I feel like the contextualized piece is super important... I researched examples of policies outside of the Twin Cities that are successful, but, in terms of broader efforts [that] are being packaged, like, under anti-displacement, we tried to stay more within the state."

"When there's a lot of different mechanisms through which displacement could take place it's worth thinking about, like, in this particular community where should we focus?"

Housing Market Conditions: Current Supply and Cost of Housing Matter for Success

Any program addressing displacement will struggle to fully remedy the problem if housing in the region is generally inaccessible. Benchmarks for success should account for what can realistically be achieved given an area's overall housing stock, median home prices, and median rental rates.

"...a lot of our portfolio are single one-bedrooms or studios. And so if you do an analysis about what that market area is offering for family-sized units, two bedrooms and up, you can see that there is a deficit. And so the market is really trying to, like, stick with the easy studios and one-bedrooms, and there isn't enough to support families."

"Housing instability is because people are poor and housing is expensive, that's when people experience a lot of housing instability. And when there's more demand for housing supply and not enough supply to meet it, that exacerbates that underlying problem."

"What's being produced [in the market] is not quite meeting in the line of people's needs, especially in terms of people going into the open market and applying $100,000 to like, you know, like a two or five million dollar house that's in North and Northeast Portland that was $500,000 just a few years ago."

CHAPTER 7: Recommendations & Future Steps

7.1 Preservation Policies

Recommendation 1: Use Stakeholder Mapping and Community Engagement to see if Affordable Housing Partners Have the Capacity and Technical Expertise to Succeed.

In this instance we are identifying affordable housing partners as community based organizations, land developers, and the Tacoma Housing Authority. The important questions to answer during this stakeholder mapping phase is whether partners have the capacity and technical expertise to accomplish preservation ordinances, TOPA, COPA, and ROFR programs.

To ensure seamless implementation of various preservation policies the City should brainstorm an initial list of qualified partners such as pre qualified entities, developers, and nonprofits. This will also enable community organizations to purchase existing multifamily buildings. Community organizations are essential for community engagement and education in any preservation policies such as TOPA, COPA, ROFR, or a preservation ordinance.

With its unique opportunity, the City can set a precedent in the Pacific Northwest with its affordable preservation policies for multifamily buildings. The City is recommended to take the lead by hosting a regional task force on affordable housing preservation, mirroring the successful partnership between the University of Minnesota's Center on Urban and Regional Affairs and Twin Cities/Minnesota. This initiative will not only bridge the gap between education research and policy practitioners but also inspire other regions to follow suit, ensuring effective implementation of affordable housing preservation policies. It is important to recognize that displacement and gentrification are sensitive topics. While we recommend that Tacoma convene a regional task force, the City should also hire an outside consultant to do restorative justice work (see chapter 3.2.3 for more context).

Next Steps:

1. Host a meeting with local housing partners in Tacoma that already develop affordable housing to introduce the idea of TOPA, COPA, ROFR, or a preservation ordinance.
2. Survey the meeting attendee to gauge their level of interest in one preservation policy versus another.
3. Create a regional working group to implement preservation work.

Recommendation 2: Seek Funding From State and Federal Government.

To accomplish any preservation program, the City must create an affordable housing preservation fund with dedicated funding within the Tacoma Housing Trust Fund.

In addition to the housing preservation fund, the Washington State Department of Commerce offers housing preservation grant programs. In 2023, Commerce funded 31 grantees with $19.8 million through the housing preservation program. The U.S. Department of Housing and Urban Development (HUD) also provides funding and resources for multifamily housing preservation through the Multifamily Office of Recapitalization. Organizations like the National Housing Trust have lent money to both D.C.'s TOPA and Montgomery County's ROFR to preserve housing. National Housing Trust provides loans to local governments to accomplish housing preservation policy nation-wide.

We recommend that the City employ at least three full-time employees to manage the housing preservation program. Once the policy is enacted, the housing preservation team will evaluate real estate deals, underwrite loans, and help landlords or tenants through the selling process.

With affordable housing preservation, it is also important to remember that the City will most likely need to provide gap financing to keep the preserved building affordable to its residents.

Next Steps:

1. Have a conversation with Tacoma's finance department and the city council to decide what the housing preservation goal is (i.e. goal number of units preserved).
2. Decide how much funding the City will devote to housing preservation and have a staff member start grant applications and researching housing trust financing options.

Recommendation 3: Think Intentionally About Preservation Program Timeline

A well-defined timeline is crucial for the success of any program that competes with the private real estate market. Whether the City is using TOPA, COPA, or ROFR, we strongly recommend granting buyers 30-60 days to make a deposit and 180 days to complete the purchase.

Next Steps:

1. Consult the city's attorney and a real estate expert to determine if this timeline meets the needs of the Tacoma housing market.

Recommendation 4: Tailor the Preservation Approach to the Type of Affordable Housing Tacoma Needs

We recommend that the City choose one preservation program to focus its efforts and funding instead of spreading itself too thin. The programs to choose from are ROFR, TOPA, COPA, and the Preservation Ordinance. Whichever preservation policy the City chooses should also be accompanied by the Housing Preservation Trust Fund. Preservation policies should be implemented incrementally for the greatest program success. The City of Tacoma should use the following as criteria to help guide the decision making process:

    A. What is the goal of Tacoma's preservation policy?
        a. Is it to preserve the most units/buildings, create tenant organizations, empower CBOs?
    B. How much of the preservation process does the City of Tacoma want to lead?
        a. What is the role of the City?
        b. What is the role of Qualified Organizations? (see appendix 12)
        c. What is the role of community partners?
    C. How much funding is the City of Tacoma able to secure for the housing preservation fund?
        a. Are there any subsidies or tax incentives from the State or future legislation that could help this work?

When choosing a preservation program, the City can tailor it to address gaps in the current affordable housing stock. For example, if the Tacoma Housing Authority lacks buildings with three or more bedrooms, the City can specify and target projects that fill this gap.

Next Steps:

1. Use an existing housing stock analysis report to find gaps in the current housing stock. For example, the *Department of Housing and Urban Development's Comprehensive Housing Market Analysis for Tacoma-Lakewood, Washington* provides helpful information about the rental market.

Recommendation 5: Create a Strong Communication Plan to Combat Misinformation

Numerous cities have faced difficulty passing TOPA or ROFR policies due to negative public response and poor communication between the governing body and the public. Although it is crucial to explain the reasons and methods behind affordable housing preservation, it is just as important to offer a platform for community feedback and restorative justice efforts to take place.

Next Steps:

1. Write a press release about the chosen preservation policy.
2. Give community members the opportunity to comment in a public forum for anti-displacement efforts.

7.2 Community Prioritization

Recommendation 1: Use an Opt-In Policy that Applies Prioritization on a Project-by-Project Basis

Creating a program that works on a by-program basis will allow for more flexibility in the implementation of community prioritization. Specifically, there can be adaptability around which neighborhoods and which communities within a neighborhood are the focus of a prioritization effort. Hilltop may not be the only neighborhood subject to gentrification, and in 100 years this policy could be used in a more relevant area/for a different group of residents

A voluntary policy, driven by the vision of an affordable developer for how to best serve a population of concern, relieves the administrative burden and pressures associated with having an applicant-centered process. Creating a program capturing all of the demand and then attempting to match all applicants with units requires much more administrative overhead and coordination. Based on rollout in the City of Seattle, a voluntary program becomes integrated into the developer-city conversations that already take place after a brief establishment period.

Another benefit of an opt-in model is that it capitalizes on existing political will. The implementation onus is on developers, not the city administrators. Developers have a good sense of their target population, and will marry their affirmative marketing process with their prioritization structure.

Finally, a voluntary, project-by-project policy is low cost compared to systems which require the establishment of entire departments and bureaucratic procedures to facilitate community prioritization, a voluntary method requires minimal additional paperwork to be filled out by developers. Based on commentary from Seattle, the program should not require a burdensome amount of extra funding.

Next Steps:

1. Determine which current employee or employees would be best suited to interface with affordable developers regarding an opt-in policy.
2. Develop a community prioritization guidance document, outlining recommendations and limitations of the policy.

Recommendation 2: Encourage Developers to Fully Align Community Prioritization Policy with Affirmative Marketing

For maximum efficacy, the community prioritization policy for a project should be paired with affirmative marketing that targets members of a racial, ethnic, or otherwise marginalized community. Relevant community organizations should be identified for affirmative marketing efforts, and an internal city document listing such organizations may already exist given affirmative marketing efforts have already taken place for several multi-family projects in Tacoma. Coordinating the scope of prioritization with affirmative marketing outreach that engages with residents within the prioritization scope will lead to ideal results. Legal guidance should be provided on the developer side and the governmental side of a project to ensure compliance with the FHA and AFFH.

Next Steps:

1. Identify someone within the City of Tacoma who can provide legal advice on whether a project's community prioritization policy complies with the FHA.
2. Develop a list of community organizations suitable for affirmative marketing.

Recommendation 3: Allow for Flexibility in Documentation Used to Fulfill Prioritization Criteria

Allow applicants to substantiate their ties to a neighborhood using a broad range of documentation. This is more equitable than relying on mail or government-issued identification alone. Beyond the aforementioned documents or documentation related to previous leases or homeownership, documents could include: yearbooks, club membership paperwork, documentation from local service providers (such as a foodbank). This will increase accessibility regarding enrolling in a project's program.

Next Step:

1. Create a list of documents potentially suitable for use in fulfilling prioritization criteria.

Recommendation 4: Set Aside 50% of Units for Community Prioritization

Using a 50% allotment will help Tacoma avoid further displacement of residents, based on the context of housing problems within the Hilltop neighborhood. In certain cases where policies are not created properly, community prioritization policies have exacerbated racial disparities and segregation. In major cities, such as New York City, there is a balancing act of not concentrating poverty in certain areas of a city by tying certain applicants to one particular neighborhood. However, given the strong preference communicated by Hilltop residents, the main population of concern, to remain in their neighborhood, an amount towards the upper bound (50%) is likely suitable. There is low desire among Hilltop residents to "move to opportunity," and a strong preference to remain within their neighborhood to enjoy a new influx

of resources (GGLO, 2016). Therefore it is appropriate for projects to use a high upper limit for community prioritization.

Next Step:

1. Monitor the success or drawbacks of a 50% allotment and adjust if needed.

7.3 Measuring Displacement

The City of Tacoma, with its equity index and identification of neighborhoods of interest for anti-displacement work, is already on par with national standards for measuring displacement via gentrification proxies. If the City wishes to improve upon their analysis of displacement, they need to improve their own and the community's data capacities and management. The first three recommendations can be conducted separately, but constitute a package of recommendations that complement and enhance each other. Recommendations 1-4 are all medium-long term recommendations to enhance data collection and processing for anti-displacement measuring in the future. Recommendation 5 constitutes an immediate action the City can take to identify areas of displacement occurring in the city. Recommendation 6 is contingent upon implementation of recommendation 4 and/or 5.

Recommendation 1: Begin community stakeholder mapping to identify potential data intermediaries and partners.

An established data intermediary would help Tacoma advance their displacement mapping by providing the city with data for little to no cost (depending on the funding sources available for the intermediary), and collecting the data outside the scope of the City's rights and abilities to collect. Additionally, a local data intermediary within Pierce County can expand data capacities beyond housing measures, as a local data intermediary, by definition, collects a broad set of data for use on many different areas of interest. Within existing partnerships, there are likely already organizations with similar community investment goals who would be willing to either host or co-host a data intermediary. For more information on data intermediaries, see 5.2.8 of this report. To get started on creating a local data intermediary, interested parties will need to assess the local data environment for potential partners. This assessment should take no longer than 3 – 6 months. The data landscape changes exceptionally quickly, and after six months information about stakeholders available to do the work may already be outdated. Stakeholders to contact in an assessment phase include:

Nonprofits/CBOs	Foundations	Local Government
Regional Agencies	Higher Education	Federal Reserve Branches
Research Organizations	Open data and government advocates	Anchor Institutions (ex: hospitals; major employers)

Other potential partners to investigate are technology companies/consumer data compilers (ex: cell phone providers; social media). These companies may be willing to participate in data sharing, and should not be left out of the conversation. Their data, if ethically produced, can give unique and cutting edge insights into community behavior and resident mobility, extending well beyond displacement matters into many other areas of interest for the government.

Next Steps:

1. Read NNIP's Guide to Starting a Local Data Intermediary (Hendy et al., 2016) for additional information on next steps and cost estimates.
2. Perform landscape analysis of existing organizations that might express interest in hosting a local data intermediary.
3. Convene identified organizations or meet one-on-one to gauge interest and potential for collaboration.
4. Work with interested organizations to clarify data needs and evaluate gaps in existing data sets, as well as assisting as needed with identifying potential funding sources as organizations get started.

Recommendation 2: Establish data sharing agreements with local community-based organizations.

Grounding quantitative data with qualitative truths is an important part of validating displacement measurements (for more information, see 5.2.2 of this report). The City of Tacoma should work with local community organizations and other trusted community leaders (especially in high priority target demographics) to establish agreements or amend existing contracts to include sharing community conditions and resident stories. This recommendation can help with the implementation of Recommendation 5 as well. The pros of establishing these relationships is that they will allow the City to acquire community driven qualitative data on conditions throughout the city, without investing significant City resources into the data collection. Since this qualitative data will be specific to certain neighborhoods, it will be the responsibility of the City to collect and analyze the data, even if a local data intermediary is established. Local data intermediaries deal primarily with generalizable, broad, quantitative measures. The drawbacks are that the data acquired, even if guidelines are put in place on what data is requested, may not be good quality or reflect what the city is interested in analyzing. Qualitative data is also harder to process than quantitative data. However, if done well, community stories can help identify areas in the city where conditions are deteriorating or where displacement is likely to occur. Qualitative data could potentially be incorporated into GIS maps based on general location/neighborhood of origin to track how neighborhoods are changing (see Chapter 5.2.7). These maps could also be interactive ways to gather community feedback, with local community leaders spreading awareness of the tool.

Next Steps:

1. Identify target demographics and key community organizations/leaders. Organizations could include but are not limited to: religious organizations, resident associations, local business associations, racial or social affinity groups, etc. Ideal organizations or key leaders are those that interact with the target demographic on a routine and personal basis.

2. Reach out to selected organizations/leaders and establish rapport. Impress the importance of the data and convey how data shared will help their community. Establish agreements and guidelines on what type of data the City is looking for and how often data should be transmitted to the City. Ensure the agreements are mutually beneficial and respectful of community perspectives and priorities.

3. Provide training and support to selected organizations/leaders as needed for data collection procedures.

Recommendation 3: Perform an audit of existing administrative data sources.

The City of Tacoma needs to assess their current data sources. Administrative data can support in-house displacement measurement, as well as provide useful data for local data intermediaries and other nonprofits interested in doing displacement measurement work. Tacoma is already making a good start by partnering with Tacoma Community College and UW Tacoma to investigate existing data sources for evaluating community safety. It is possible some data sources for community safety will overlap with data sources necessary for displacement. We recommend continuing to evaluate what sources of administrative data the City already regularly collects and creating relationships with program and data administrators for relevant indicators (see Appendix 6).

Next Steps:

1. Identify indicators to be used for measuring displacement. At minimum, we recommend college education levels, home prices, and rent prices. The Federal Reserve Index will provide a good starting point for identifying gaps in indicators and data sources.

2. Audit existing administrative data sources against indicators chosen. Areas where data is collected regularly (at minimum once a year) will suffice. Any indicators where data is collected less frequently, for only part of the city, or not at all will require additional data sources.

3. Make plans for supplementing the missing data. The City can either begin collecting the missing data itself, or can outsource this data collection to local data intermediaries or community based organizations, as established in the previous two recommendations.

Recommendation 4: Create and maintain a continuous indicators tracking system.

Contractors will be capable of setting up a displacement measuring indicators system, but are probably not the right choice for long term maintenance of such a program. A system could be a simple extension of the Equity Index, focused more on displacement indicators (ex: college attainment; rent), or could be entirely independent from the Equity Index. Additionally, any system would be enhanced by qualitative data and interactive mapping (see Recommendation 2 as well as Chapter 5.2.7 for more detail). Regardless of the approach chosen, staff will be vital to maintain the system and create comprehensive reports. Staff should be knowledgeable in data analytics, statistical analysis, and GIS systems. Qualified staff may already be employed within the city. If so, reassignment of roles may occur - however, take caution against assigning such staff additional responsibilities. Maintaining an indicators program is in itself a full-time position. A continuous indicators program should be updated (i.e., a report created) in alignment with ACS data timelines if using census data, or possibly more frequently if using data compiled by a local data intermediary. It should be updated no more frequently than once a year (or two), as things are not likely to change significantly in shorter time-frames.

Next Steps:

1. Decide whether to expand the existing Equity Index to also track displacement or create a new continuous indicators system for displacement measurement. This will impact the number of staff necessary to ensure smooth and continuous monitoring.
2. Hire staff to maintain the system, or reassign existing staff to the system. Maintaining an indicators system is in itself a full-time position.
3. Maintain the system:
   a. Create a comprehensive report no more frequently than once a year. Conditions in neighborhoods are not likely to change significantly in shorter time-frames.
   b. Staff may also be used to maintain any interactive GIS maps employed to gather community data.

Recommendation 5: Conduct community survey of recent residential moves.

Given that displacement can only truly be measured by validating if a household was involuntarily forced out of their residence and/or neighborhood, this is the single most important step Tacoma can take to get an idea of the amount of displacement happening in the city (for more information, see 5.1.3 and 5.2.2 of this report). Given the complexity of designing a survey and community engagement campaign, hiring a consultant for initial research design and webpage creation (if conducted online) may be useful.

The City needs to find a way to target the survey to households that are moving or have recently moved. The length of time between relocation and surveying should be short enough that people do not rationalize their decision to move post-move. The City should evaluate what administrative data they have access to regarding changes of addresses. Possible data sources include eviction notices, and change of addresses with post offices. It is possible that the City

administrative data sources will not suffice to track down recent migrants, either before they move or after they are at their new residence. Thus, another option is to have the survey be distributed online. If conducted this way, the City must take great care to ensure the survey is widely known to increase survey participation. This again can work with Recommendation 2, as partnering with community representatives can spread information in multiple directions.

We recommend that this survey be open continuously if conducted online, and results monitored and analyzed on a semi-annual basis. This will help the City identify where other anti-displacement policies, such as the flexible community prioritization, should be focused. If there are not enough resources available to do continuous surveying and analyzing, then we recommend conducting the survey and analyzing results yearly. However, doing it this way opens the possibility of inaccuracies in the data as people rationalize decisions or fail to fill out the survey because they no longer feel it is relevant to them.

Next Steps:

1. Create survey questions and website. Survey questions should be tested before official use to ensure the language is clear, culturally sensitive, and accurately captures the intended data. Include screening questions to establish residency (current or immediately prior to last move) in Tacoma, but do not require documentation to prove it.
2. Translate the survey questions into all applicable languages used in Tacoma.
3. Disseminate survey to target audiences via community engagement. Utilizing community based organizations, as with recommendation 2, should increase uptake of the survey. Make the survey an easy to find and permanent part of the City's website so people can access the survey whenever they move. Consider advertising the survey at homeless shelters and supportive housing facilities.
4. Analyze results from survey on a yearly basis at minimum. Use results to fine tune displacement measurement results from other sources, like the Equity Index or a displacement measurement index, and adjust policies as needed.

Recommendation 6: Create a one-stop site for providing information about and encouraging feedback on displacement within the city.

Our final recommendation is dependent on the City choosing to follow recommendations 4 and 5, specifically the online engagement aspects (interactive maps for qualitative feedback; online survey of residential moves). To ensure these tools are well utilized, having them all in one place and easy to find is crucial.

1. Design a webpage to host all anti-displacement related topics. This can include 1) information about City policies to address displacement, 2) interactive feedback maps, 3) residential moves survey link, 4) link to the Equity Index, and 5) displacement indicator system annual reports.

2. Ensure the page is easily accessible (i.e., one can find it, starting on the City's homepage, without having to pass through more than three hyperlinks).
3. Work with community-partners to ensure the page is well known. During initial roll-out, contact local media and utilize social media to spread awareness.

APPENDIX

Appendix 1: Interview Guides

Interview Guide - Academics

Script: Hello, we would first like to thank you for sharing your time and insights with our capstone team today. We are a group of second-year MPA students from the University of Washington conducting research on best practices for anti-displacement policies, and we have identified you as someone who is doing important and relevant research in this area. If any of the following questions are not applicable to you or your work, please feel free to say so. However, we would appreciate whatever answers you can provide to the best of your ability. We will be recording this interview and taking notes to assist in our analysis of the information you share with us today. Do you give us permission to record and take notes during this interview?

- *If permission for recording is granted, press RECORD on Zoom and begin the interview.*
- *If permission for recording is not granted, ask for consent to take notes and then begin the interview.*

Do you have any questions or comments before we begin our interview?

***Questions*:**

1. Could you please state your name and professional title?

2. Could you summarize how your work relates to the topic of anti-displacement?

3. What is your relationship with your local anti-displacement program?
   a. Would you consider this program the one of which you have the most knowledge?
      i. *If yes, proceed with questions as written*
      ii. *If no, adjust the language of the questions to reflect discussion of their program of expertise (not their local program)*

4. What were the motivating factors for your locality to implement these programs?

5. What specific processes within the local program would you highlight as most effective?
   a. How do you think another city (such as Tacoma) could incorporate these aspects into their own anti-displacement program?

6. Can you share any knowledge you have regarding local community prioritization programs?

a. Could you detail how the program functions in your locality?
   i. What are the strengths of your local program?
   ii. What are the weaknesses of your local program?

7. Can you share any knowledge you have regarding local preservation ordinances?
   a. Could you detail how the ordinances function in your locality?
      i. What are the strengths of your local program?
      ii. What are the weaknesses of your local program?

8. Are you aware of any displacement or gentrification measures currently in use at your agency? (For example, many jurisdictions utilize census data to categorize districts/neighborhoods into risk categories.)
   a. Can you please describe in detail how this measure is utilized? (Ex: for determining where to allocate resources, determine zoning and development, transit improvements, social programming, etc)
   b. What indicators are used to measure displacement?
   c. Is the measure your agency uses static (aka a one-off report analyzing a set time period) or dynamic (ex: utilizes community input to actively track changes)?
   d. What resources (money, staff and staff time, etc) are needed to implement this measurement system?
   e. Do you have any recommendations on how a similar system could be implemented elsewhere?
      i. Is there anything you feel should be done differently if you had to start the system again from scratch?
9. Can you share any other knowledge you have regarding how to quantifiably measure displacement?
   a. Could you provide guidance on how to measure displacement?
   b. Are there any other notable displacement measuring devices (besides the one used at your agency (if applicable)) that you would recommend we look into?
      i. Can you provide us with any contact information for people running relevant programs?
   c. Are there any other notable cities measuring displacement that you think we should look into?
      i. Can you provide us with any contact information for people running relevant programs?

10. If your locality had more resources to apply to anti-displacement strategies, how would you recommend the government apply them?

12. What other localities are doing these kinds of programs well?

13. Who else do you think our team should speak with regarding anti-displacement policies?
    a.   Would you be able to provide contact information for any of these individuals?

Interview Guide - Practitioners

Script: Hello, we would first like to thank you for sharing your time and insights with our capstone team today. We are a group of second-year MPA students from the University of Washington conducting research on best practices for anti-displacement policies, and we have identified you as someone who is doing important and relevant work in this area. If any of the following questions are not applicable to you or your work, please feel free to say so. However, we would appreciate whatever answers you can provide to the best of your ability. We will be recording this interview and taking notes to assist in our analysis of the information you share with us today. Do you give us permission to record and take notes during this interview?

- *If permission for recording is granted, press RECORD on Zoom and begin the interview.*
- *If permission for recording is not granted, ask for consent to take notes and then begin the interview.*

Do you have any questions or comments before we begin our interview?

***Questions*:**

1. Could you please state your name and professional title?

2. Could you summarize how your work addresses the issue of displacement?

3. What were the motivating factors for your locality to implement an anti-displacement program?

4. What specific processes within your anti-displacement program would you highlight as most effective?
    a.   How do you think another city (such as Tacoma) could incorporate these aspects into their own anti-displacement program?

5. Do you conduct any work related to local community prioritization programs?
    a. Could you detail how the program functions in your locality?
            i.   What are the strengths of your local program?
           ii.   What are the weaknesses of your local program?
          iii.   What level of staffing does this program have?
           vi.   What is the annual budget of this program?

6. Do you conduct any work related to local preservation ordinances?
   a. Could you detail how the ordinances function in your locality?
      i. What are the strengths of your local program?
      ii. What are the weaknesses of your local program?
      iii. What level of staffing does this program have?
      vi. What is the annual budget of this program?

The following questions relate to displacement and gentrification measurement strategies.

7. In your line of work, do you know of a standard "rate of displacement" that would be considered too much? (related to migration and vacancy rates) (ex: what is the difference between natural turnover and displacement? Is there a set point?)

   1. What factors affect this rate?

8. Are you aware of any displacement measures currently in use at your agency? (For example, many jurisdictions utilize census data to categorize districts/neighborhoods into risk categories.)

   If yes,

   a. Can you please describe in detail how this measure is used? (Ex: for determining where to allocate resources, determine zoning and development, transit improvements, social programming, etc)

   b. What indicators are used to measure displacement?

   c. Is the measure your agency uses static (aka a one-off report analyzing a set time period) or dynamic (ex: utilizes community input to actively track changes)?

   D. What resources (money, staff and staff time, etc) are needed to implement this measurement system?

   e. Can you please describe the impact this measurement had on the area?

   f. What were the biggest challenges to measuring displacement this way?

   g. What was the rationale behind measuring displacement in this way?

   h. Do you have any recommendations on how a similar system could be implemented elsewhere?

9. Are you familiar with any "smart cities" measurement tactics or other strategies that involve utilizing real-time or community generated data?

10. Can you share any other knowledge you have regarding how to quantifiably measure displacement?

11. Is there anything we haven't covered regarding measuring displacement that you think we should know about?

12. If your locality had more resources to apply to anti-displacement strategies, how would you recommend applying them?

13. What other localities are doing these kinds of programs well?

14. Who else do you think our team should speak with regarding anti-displacement policies?

Appendix 2: Examples of a Community Based Organizations/Partners List

Community Partner	Type of organization	Connection to anti-displacement	Website
UW Tacoma	Education	All touchpoints	UW Tacoma Home | About UW Tacoma | University of Washington Tacoma
UW Seattle Runstad Department of Real Estate	Education	Measuring displacement -tool building	Runstad Department of Real Estate | University of Washington (uw.edu)
UW Seattle Evans School of Public Policy and Governance	Education	All touchpoints - community engagement and surveying	Home - Evans School of Public Policy & Governance (uw.edu)
South Sound Affordable Housing Partners	Community Based Organization	Preservation policies	Home Page - South Sound Affordable Housing
Affordable Housing Management Association of Washington	Regional chapter of the National Affordable Housing Management Association	Prioritization	Home (ahma-wa.org)
BnB Builders	Housing Developers	Preservation	Offices | BNBuilders | Commercial Building Solutions
Beacon Development Group	Housing Developers	Preservation	Services | Beacon Dev Group
Metropolitan Development Council	Community Based Organization	All touchpoints - community engagement	About MDC - MDC (mdc-hope.org)
Washington State Housing Finance Commission	Housing finance	Preservation	WSHFC | Washington State Housing Finance

			Commission
Federal Reserve Bank	Housing finance	Preservation	The Federal Reserve - FRBservices.org
Multicare Tacoma General Hospital	Anchor Institution	Measuring Displacement	Tacoma General Hospital - Tacoma, WA - MultiCare
El Centro de la Raza	Community based organization	All touchpoints - community engagement	Housing - El Centro de la Raza
Asian Pacific Cultural Center	Community based organization	All touchpoints - community engagement	HOME | Asia Pacific Cultural Center, Tacoma, WA
Department of Housing and Urban Development Washington Office	State Agency	All touchpoints- technical partner	Contact HUD: Washington | HUD.gov / U.S. Department of Housing and Urban Development (HUD)

Appendix 3: Interview Details

Tacoma Interviews	Area of Expertise	Job Title	City	Date
Allyson Griffith		Neighborhood and Community Services Director	Tacoma	2/6/2024
Felicia Medlen		Housing Division Manager	Tacoma	2/13/2024
Heidi Burbidge		Principal Housing Analyst	Tacoma	2/13/2024
Formal Interviews		**Job Title**	**City**	**Date**
Gregg Colburn	General Housing Policy in PNW	Associate Professor - College of Built Environments, UW	Seattle	2/16/24
Lee Guekguezian	Preservation, Preference, and Measuring Displacement	Affordable Rental Housing Research Analyst (PDX)/Community Based Research Programs Manager	Portland/Minneapolis	2/19/2024
Jess Gomez	Preference and Preservation	Strategic Advisor of Housing Policy for Equitable Development	Seattle	2/26/2024
Dyvisha Gordon	Preference	Housing Bureau Community Specialist	Portland	
Niki Luneclair	Mandatory Relocation	Policy and Program Coordinator	Portland	
Tim Reardon	Measuring Displacement	Chief of Data and Research, Massachusetts Executive Office of Housing and Livable Communities	Sommerviller MA	3/15/2024
Ed Goetz	Measuring Displacement	Director of CURA at University of Minnesota	Twin Cities	4/9/2024
Jenny Raitt	Measuring Displacement	Executive Director, Northern Middlesex Council of Governments	Sommerviller MA	3/15/2024
Tony Damiano	Measuring Displacement	Research Scientist | Center for Urban and Regional Affairs (CURA)	Minneapolis Twin Cities	3/25/2024
Scott Brunton	Preservation	Director, Montgomery County Department of Housing and Community Affairs	Maryland- Montgomery County	4/1/2024

Contacted				
Lisa Bates	Preference	Professor, Portland Professor in Innovative Housing Policy, Portland State University	Portland	Denied an interview
Anna Cash	Preservation	Community Development Project Coordinator	Berkeley	Does not work there anymore
Jacob Vigdor	General Housing Policy	Professor, Evans, UW	Seattle	Not as relevant
Scott Allard	General Housing Policy	Professor, Evans, UW	Seattle	Not as relevant
Andrew Goffeney	Gentrification Tools	MPA Student, Evergreen	Tacoma	Not as relevant
C Terrence Anderson	CURA contact	Director - Community Based Research	Twin Cities	Already talked to Lee
Kimberly Driggens	Preservation	Executive Director of the Washington Housing Conservancy	Washington D.C.	She did not have time in schedule
Lance Freeman	Measuring Displacement	Penn Integrates Knowledge Professor of City and Regional Planning, and Sociology	Philadelphia	Emailed and no response
Karen Chapple	Measuring Displacement	Director of School of Cities at University of Toronto	Berkeley, Toronto	Emailed and she told us to read her papers
No contact person		DC Department of Housing and Community Services	Washington D.C.	Called and Emailed with no response
Philip Verma		Program Officer - Housing and Community Development	San Francisco	Could not find info
Steven Gallardo		Displaced Tenant Housing Preference Program Coordinator	San Francisco	Could not find info

Appendix 4: Rules-Based Approaches to Measuring Displacement (Firth et al., 2020)

Table 1

Comparison of common rule-based area-level gentrification measures used in the United States and Canada.

	Freeman	Ellen & O'Regan	McKinnish et al.	Landis	Ding et al.	Bostic & Martin	Grube-Cavers & Patterson
Spatial areas	Census tracts in central cities in the U.S.	Census tracts with 200+ people in the U.S.	Census tracts in metro areas in the U.S. with population ≥500,000 and within 5 km from a city with population 100,000+ in 1990	Urban and suburban census tracts in 70 largest U.S. metro areas	Census tracts with 50+ people and housing units in the U.S.	Census tracts in 50 largest metropolitan areas in the U.S.	Census tracts in three metropolitan areas in Canada
Gentrification eligibility	1) Median income below 40th percentile of the metro area 2) Proportion of housing built ≤20 years was below 40th percentile of the metro area	Average income below 70% of metro area	Average family income ≤20 percentile nationally	Median income is in lowest four deciles for the city	Median income below the median for the city	Median income <50% median income for metro area	Average family income & number of degrees per capita were lower than metro area
Gentrification typology	Gentrifying Nongentrifying All other urban tracts	Gentrified Non-gentrifying Non-gentrifiable	Gentrifying Non-gentrifying	Upgrading *(improvement in census tracts that had median income above lowest four deciles in the city)* Gentrifying Declining	Gentrifying:[b] Stalled gentrification Continued gentrification Weak gentrification Moderate gentrification Intense gentrification Nongentrifying Nongentrifiable	Gentrifying Gentrifiable Non-gentrifiable	Gentrifying Gentrifiable
Conditions for gentrification							
Income	n/a	At least 10 percentage-point increase in average income of census tract to metro area ratio (e.g. in 1990 census tract income was 60% that of metro area and in 2000 was 70% of metro area)	Real increase of at least $10,000 in average family income	Median income increases by 2+ deciles (based on the distribution of income twenty years later)	n/a	Increase above 50% of the median income for metro area	Increase in family income above metro area
Education attainment	Increase in college graduates greater than that of metro area	n/a	n/a	n/a	Increase in college educated residents above median for the city	Increase in college educated residents	Increase in number of degrees per capita above metro area
Housing	Increase in housing prices	n/a	n/a	n/a	Increase in gross rent or median home value above median for the city	Increase	Increase in average monthly rent greater than metro area; Increase in percent of owner-occupied dwellings greater than metro area
Age	n/a	n/a	n/a	n/a	n/a	Proportion of adults aged 30–44 years increased	n/a
Race/ethnicity	n/a	n/a	n/a	n/a	n/a	Proportion of white non-family households increases Proportion of Black residents decreases	n/a
Occupation	n/a	n/a	n/a	n/a	n/a	Proportion in managerial and administrative work increases	Increase of proportion of people in professional occupation greater than metro area
Poverty	n/a	n/a	n/a	n/a	n/a	Decreased	n/a

Appendix 5: Improving studies on impacts of gentrification

Criteria	Gentrification measurement	Study design and analysis considerations
Context	**Acknowledge the historical, financial, social, and political contexts** that contribute to neighborhood change and make gentrification possible. Context can identify specific social policies that may be accelerating gentrification and provide insights on interventions that may be effective at mitigating negative consequences of gentrification (Maloutas, 2011).	**Incorporate life course epidemiological approaches into gentrification research** (Kuh et al., 2003). Consider the critical periods during peoples' lives when they are most susceptible to health impacts of gentrification exposure and the effect of cumulative exposure. For instance, youth who moved to lower-poverty areas when they were young (<13 years) had positive health effects, but youth who moved during their adolescents had negative effects (Chetty et al., 2016). **A system science approach can account for the complexity of the gentrification phenomenon in analytic models.** Simulationbased models are well suited to incorporate interactions and feedback loops between factors (e.g. historical, financial, social, and political contexts) and assess theory-driven research question relating to phenomena that are difficult to measure (Arnold et al., 2019).
Scale	**Measure neighborhood change at multiple spatial scales**; though convenient, census-defined boundaries may not align with built environment interventions, community identity, or neighborhood associations (Flowerdew et al., 2008). **Gentrification is a relative measure, consider the size of the comparison area**. Rule-based measures compare relative changes between census tracts and larger areas (e.g. city, metro, nation). Comparisons made to larger areas may not be relevant to the study area. For example, comparing San Francisco census tracts to a national cutoff to determine gentrifiable areas would be naïve since San Francisco is a high-income area.	**Consider the role of space and spatial dependence.** Acknowledge the limitations of choosing a particular spatial scale when examining neighborhood change (see (Openshaw and Taylor, 1981) for a discussion on the modifiable areal unit problem). **Incorporate spatial dependence in analysis.** The effects of gentrification may spill over into neighboring areas, and the effects of built environment interventions may not be contained inside the areas in which implementation occurred. **Multi-level modeling approach to facilitate inference at the individual, neighborhood and city level** (see (Diez-Roux, 2003) for conceptual and methodological consideration in multi-level epidemiological studies).
Misclassification	**Incorporate data from multiple perspectives** into gentrification measure. Beyond census, use crowdsourcing or local governments for data on building permits, home renovations, low-income housing, etc (Loukaitou-Sideris et al., 2019) that capture neighborhood reinvestment. Make sure variables are aligned with the gentrification definition and do not include variables that are causes or consequences of gentrification. For a table on indicators and data sources for analyzing gentrification and displacement, see (Chapple and Zuk, 2016) **Use novel quantitative methods**, like machine learning or deep learning artificial intelligence with Google Street View (Ilic et al., 2019), to catalog built environment changes that may signal gentrification instead of rule-based methods.	**Leverage mixed methods study designs to ground truth area-level quantitative studies with residents' perspectives** (Burch and Heinrich, 2016). Mixed methods studies can provide insight on the specific causes or built environment changes and consequences of gentrification.
Specificity	**Ensure conceptualization of gentrification is relevant to the research question.** Use a specific conceptualization of gentrification and mechanisms to link gentrification to acute and chronic health outcomes (see (Tulier et al., 2019) for discussion on specificity in epidemiological studies on gentrification impacts). **Incorporate severity of gentrification, duration of exposure, and how rapidly neighborhood changes have occurred** (Hirsch and Schinasi, 2019). Drawing from life-course epidemiology, study cumulative exposure to gentrification ('how much' and 'for long').	**Sacrifice generalizability for a well-conceived study that addresses a timely and relevant research question.** Consider visualizing potential causal mechanisms with causal diagram or directed acyclic graphs.
Temporality	**Align gentrification measurement with neighborhood change.** To address temporal misclassification, consider using alternative data sources to measure intercensal neighborhood change (e.g. supplement decennial census variables with annual American Community Survey estimates for US-based studies). For example, if gentrification occurred rapidly within a 4-year period (2008–2012), and gentrification is measured every ten years (2000–2020), the actual period of gentrification would be missed entirely.	**Ensure sufficient follow up time in longitudinal studies.** In both retrospective and prospective studies, is there sufficient follow up time to theoretically change the health outcome of interest (Tulier et al., 2019)? Is there sufficient lag time between measures of gentrification, neighborhood conditions and health outcomes to consider gentrification caused changes in health status? **To estimate the cumulative causal effect of gentrification on health outcomes**, use marginal structural models or other G methods to address time-varying confounders and provide unbiased estimates (Mansournia et al., 2017). An example of estimating cumulative exposure to tax credits on health using marginal structural models (Pega et al., 2016).
Counterfactual		**Use well-defined comparison groups.** The unexposed group (or non-gentrified comparison group) should represent the counterfactual and be similar in all ways to the gentrifying group except for their exposure to gentrification (further discussion on natural experiments in population health studies (Bor, 2016)).

Appendix 6: Indicators for Measuring Displacement and Potential Data Sources

Indicators and Data Sources for Analyzing Gentrification and *Displacement*		
Indicator Type	**Indicators**	**Possible Data Sources**
Changes in property values and rent	Sales value, property value	County tax assessors offices, finance departments, data aggregators
	Rent	Data aggregators, apartment operating licenses, craigslist
	Changes in affordability (rent) of restricted affordable housing	HUD, housing departments
	Housing cost burden on households	Census data, community surveys
Investment in the Neighborhood	Building permits, renovation permits, absentee ownership	Building or planning departments
	Mortgage lending and characteristics	Home Mortgage Disclosure Act and assessors' data
	Sales of homes (volume and price)	County assessors' offices, data aggregators
	Condominium conversions	Assessors' offices, housing departments, public works departments
	Change in community/business organizations and economic diversity (ex: number, nature of activities)	Chamber of Commerce, local neighborhood/business associations, etc
	Public investments (ex: transit, streets, parks)	Public works departments, transit agencies, parks and recreation departments, etc
Disinvestment	Building conditions, tenant complaints, vacancies, fires, building condemnation	Surveys, census data, maps, building departments, utility shut-off data, fire departments
	School quality, crime, *employment rates, neighborhood opportunity*	Departments of education, police departments, census data, Bureau of Labor Statistics
	Neighborhood quality (ex: sidewalk condition)	Local surveys

Change in tenure or demographics	Tenure types, *change in tenancy*	Building departments, assessors' offices, census data
	Evictions	Rent boards, superior courts
	Foreclosure	HUD, proprietary data sources
	Demographics data on in- vs. out-migrants	Census data, voter registry data, real estate directories, American Housing Survey, departments of motor vehicles
Investment Potential	Neighborhood and building characteristics (ex: age, square footage, improvement-to-land ratio)	Tax assessors, census data, deeds, etc
	Neighborhood perceptions	Surveys of residents, realtors, lenders, neighborhood businesses, newspapers, television, blogs, etc
Reasons for moving in or out of neighborhoods	*Reason for move*	Surveys of in-migrants and out-migrants, state housing discrimination complaints database
Coping strategies for displacement	Crowding or doubling up	Census data, utility bills, building footprints
Transportation methods	Increased travel distance and time	Census data
	Commute mode share	Travel surveys
	Transit commute times	Travel surveys
	Vehicle ownership and mileage	Department of motor vehicles
	Access to transit	Maps

Table largely based off (Chapple & Zuk, 2016), with additions

Italicized: very relevant for displacement

Appendix 7: LAIDP Displacement Index Criteria

MODIFIED TYPES	CRITERIA
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	• Low or mixed low-income tract in 2018
ONGOING DISPLACEMENT OF LOW-INCOME HOUSEHOLDS	• Low or mixed low-income tract in 2018 • Absolute loss of low-income households, 2000-2018
AT RISK OF GENTRIFICATION	• Low-income or mixed low-income tract in 2018 • Housing affordable to low or mixed low-income households in 2018 • Didn't gentrify 1990-2000 OR 2000-2018 • Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018 • Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap
EARLY/ONGOING GENTRIFICATION	• Low-income or mixed low-income tract in 2018 • Housing affordable to moderate or mixed moderate-income households in 2018 • Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018 • Gentrified in 1990-2000 or 2000-2018
ADVANCED GENTRIFICATION	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
STABLE MODERATE/MIXED INCOME	• Moderate, mixed moderate, mixed high, or high-income tract in 2018
AT RISK OF BECOMING EXCLUSIVE	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change or increase in housing costs
BECOMING EXCLUSIVE	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
STABLE/ADVANCED EXCLUSIVE	• High-income tract in 2000 and 2018 • Affordable to high or mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

(*Los Angeles – gentrification and displacement*)

Appendix 8: LAINC Results

Indicator		Los Angeles County	Orange County	San Diego County
Disadvantaged neighborhoods are those census tracts that are "eligible" or susceptible to gentrification. A tract must meet all of the following criteria: 1. Population = 500 people 2. Any combination of at least 3 indicators: • % low income households > regional median • % college educated < regional median • % renters > regional median • % nonwhite > regional median	Total Tracts	2346 Tracts	583 Tracts	628 Tracts
	Disadvantage in 1990 only:	962 Tracts	248 Tracts	243 Tracts
	Disadvantage in 2000 only:	924 Tracts	244 Tracts	242 Tracts
	Disadvantaged both decades:	850 Tracts	224 Tracts	212 Tracts
Gentrified neighborhood, once a census tract is determined to be "eligible", it is considered "gentrified or gentrifying" if it meets all of the following criteria: • Change in % college-educated > county (percentage points) • Change in % non-Hispanic white > county (percentage points) • Change in median household income > county (absolute value) • Change in median gross rent > change county median gross rent (absolute value)	Gentrified between 1990-2000 only:	69 Tracts	9 Tracts	11 Tracts
	Gentrified between 2000-2015 only:	80 Tracts	9 Tracts	13 Tracts
	Gentrified both decades:	8 Tracts	0 Tracts	3 Tracts

(*Los Angeles – gentrification and displacement*)

Appendix 9: Seattle Displacement Indicators

Table 3 Displacement Risk Index indicators

Indicator	Description	Source
1 People of color	Percentage of the population that is a race other than non-Hispanic White	2010 Census
2 Linguistic isolation	Percentage of households in which no one 14 and over speaks English only or no one 14 and over speaks both a language other than English and English "very well"	2008–2012 American Community Survey
3 Educational attainment	Percentage of the population 25 years or older who lack a Bachelor's degree	2008–2012 American Community Survey
4 Housing tenancy	Percentage of households that are renters	2010 Census
5 Housing cost-burdened households	Percentage of households with income below 80% of area median income (AMI) that are cost burdened (paying > 30% of income on housing)	Consolidated Housing Affordability Strategy (CHAS) (based on 2007–2011 American Community Survey)
Severely housing cost-burdened households	Percentage of households with income below 80% of area median income (AMI) that are or severely cost burdened (> 50% of income on housing)	
6 Household income	Percentage of the population whose income is below 200% of poverty level	2008–2012 American Community Survey
7 Proximity to transit	Number of unique transit trips within a quarter-mile walking distance	King County Metro General Transit Feed Specification (GTFS)
8 Proximity to current or future Link light rail and streetcar	Location near a current and future light rail stations and streetcar stops, measured by walking distance	Sound Transit
9 Proximity to core businesses	Location within a certain distance of supermarket/grocery (0.5 mi), pharmacy (0.25 mi), and restaurant/café/diner (0.25 mi)	City of Seattle
10 Proximity to civic infrastructure	Location within a certain distance of a public or private school (0.25 mi), community center (0.25 mi) or park of at least 0.25 acre (distance varies based on park size), or library (0.5 mi)	ReferenceUSA
11 Proximity to high-income neighborhood	Census tracts that (a) have a median household income < 80% of AMI and (b) abut a tract where median household income is > 120% of AMI	King County GIS
12 Proximity to job center	Travel time to designated King County Urban Centers and Manufacturing/Industrial Centers	City of Seattle
13 Development capacity	Parcels that allow residential uses identified as likely to redevelop in City development capacity model	2008–2012 American Community Survey
14 Median rent	Ratio of rent per net rentable square foot by tract to the Seattle average for rent per net rentable square foot	Dupre + Scott (Spring 2016)

(Seattle Office of Planning and Community Development, 2016)

Appendix 10: Seattle Access to Opportunity Indicators

Table 4   Access to Opportunity Index indicators

Indicator		Description	Source
1	School performance	Elementary school math and reading proficiency scores by attendance area	Washington Office of Superintendent of Public Instruction (OSPI)
2		Middle school math and reading proficiency scores by attendance area	
3	Graduation rate	High school graduation rate by attendance area	
4	Access to college or university	Location within 30 minutes of a college or university by transit (bus and/or light rail)	City of Seattle King County Metro GTFS Sound Transit
5	Proximity to a library	Location within quarter-mile walking distance to a library	City of Seattle
6	Proximity to employment	Number of (by census tract centroid) jobs accessible in 30 minutes by transit	Puget Sound Regional Council 2013 Covered Employment Estimates
7	Property appreciation	Change in median home value 2000–2013	2000 Census 2009-2013 American Community Survey
8	Proximity to transit	Number of unique transit trips within 0.25-mile walking distance	King County Metro General Transit Feed Specification (GTFS)
9	Proximity to current or future Link light rail and streetcar	Location near a current and future light rail stations and streetcar stops, measured by walking distance	Sound Transit City of Seattle
10	Proximity to a community center	Location near a City-owned and City-operated community center, measured by walking distance (Proximity determined by the size of the park. Larger parks have larger service areas.)	City of Seattle
11	Proximity to a park	Location near a public open space, measured by as-the-crow-flies distance	City of Seattle
12	Sidewalk completeness	Percentage of block faces within a quarter mile missing a sidewalk (excluding those SDOT has not identified should be improved)	City of Seattle
13	Proximity to a health care facility	Location near a health care facility, measured by walking distance	King County Public Health (2010)
14	Proximity to a location that sells produce	Location near a supermarket, produce stand, or farmers market, measured by walking distance	ReferenceUSA Washington State Farmers Market Association

(Seattle Office of Planning and Community Development, 2016)

Appendix 11: Codebook

Theme	Subtheme	Definition	Code
Community	Grassroots Advocacy	Advocacy driven by members of the public collectively lobbying for a particular policy change and/or improved outcome regarding a certain facet of their lives	Code **C_GA** if content references community members organizing around or advocating for improved housing options
	Community Outreach	The process of an agency soliciting public opinion regarding an agency's processes or programs	Code **C_CO** if content references program administrators seeking out public opinion regarding a housing program or the general housing market
Housing Market Conditions	Cost	The price of housing units for rent or for sale	Code **HMC_COS** if content references the price of housing
	Supply	The amount of housing units for rent or for sale	Code **HMC_HS** if content references the supply of housing
	Homelessness	A state in which a person has no stable housing and is visibly living outside of standard concepts of housing (not living in a roofed building)	Code **HMC_HOM** if content references the presence of unhoused people
Class		The socioeconomic status of a group of people within a larger societal hierarchy	Code **CLASS** if content discusses the relative socioeconomic status of a neighborhood
Race		"An arbitrary classification of modern humans, sometimes, especially formerly, based on any or a combination of various physical characteristics, …their ancestry, historical affiliation, and or a shared culture"*	Code **RACE** if content discusses any racial categories as defined by the US Census (White, Black or American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander) or other descriptions of ethnic background
Bureaucracy		The legal requirements and procedural steps involved in the policy creation and implementation process	Code **BUR** if content discusses governmental or legal barriers to program implementation or the development of a policy
Suitability		The extent to which a policy is or is not compatible with the local context in which it is being implemented	Code **ST** if content discusses tailoring an intervention to match the needs and capacity of a locality
Program Impediments	Technical Constraints	Technical limitations for researching certain topics and accessing certain data. Can also include a lack of data or available information.	Code **PI_TC** if content discusses the extent to which statistical information or technical capacity impacts the efficacy of a program, whether that be enhancing, detracting or neutral
	Program Financial Constraints	Budgetary limitations for any given intervention targeting housing issues and/or gentrification	Code **PI_PFC** if content refers to lack of resources for a program (money, time, staff) or resource allocation decisions
Transit Projects		Large scale developments that improve transportation options and mobility within a locale	Code **TP** if content refers to the construction of bus/light rail/road projects

*This definition of race is taken from this URL: https://www.dictionary.com/e/race-vs-ethnicity/

Appendix 12: Defining Qualified Organization from CNHED

Qualified Organization: In order to become a Qualified Organization, any interested developer may apply to the City for this certification. The City will consider applications to become a Qualified Organization on a rolling basis. The City should develop an application form and evaluation criteria that consider the following requirements and qualifications for Qualified Organization certification:

- Be registered a license to do business in the City;
- Agree to obligate itself and any successors in interest to maintain the affordability of the Rental Housing Accommodation according to the requirements to exercise the Right of First Offer and Right of First Refusal;
- Demonstrate the capacity to own and manage, either by itself or through a management agent or partnerships, a Rental Housing Accommodation for its remaining useful life. Capacity considerations include:
    - Demonstrated capacity and expertise in acquiring, renovating, and owning not fewer than ten units of affordable rental housing, or renovating and selling not fewer than ten units of affordable homeownership housing, in the City, including documentation of the following:
        - Comprehensive list of prior affordable housing development and market-rate housing development in the City, including project addresses, number of units, description of project renovation, description of project financing;
        - Qualifications and capacity of proposed personnel and contractors to carry out the development of a Rental Housing Accommodation;
        - List of lenders and equity sources used in prior projects; Description of affordability levels (whether naturally occurring affordable housing or rent or income restricted housing) applicable to prior projects;
        - Affirmative statement that the developer has never been in financial default as either a borrower or a guarantor; or, if to the contrary, explaining in complete detail all circumstances pertaining thereto;
        - Description of Developer's typical asset management plan;
        - Description of Developer's typical management plan; and
        - Other criteria the City determines appropriate.
    - Certification that the person or each principal in the entity is not an owner of a property that is a registered vacant building in the (City of Tacoma), tax delinquent property, or property with significant code or rental license violations, unless the property is currently in the process of being rehabilitated in compliance with a restoration agreement or has a similar solution that is actively being implemented;

- ○ Certification that the person or each principal in the entity does not have an uncured default on a (City of Tacoma) restoration agreement and/or redevelopment contract to rehabilitate or construct a property; and
- ○ Affirmative commitment to affordable housing in all future proposals submitted in response to a Right of First Offer or a Right of First Refusal.

Before final consideration of a Developer's application, the City shall publish for public comment basic information on a rolling basis a list of all Developers that apply to each request and allow at least 30 days for the submission of comments in support or against a Developer's application to become a Qualified Organization

GLOSSARY

Administrative Data: *Administrative data refers to data collected and maintained by federal, state, and local governments, as well as some commercial entities. This information is called "administrative data" because data collected and maintained by agencies or firms are used to administer (or run) programs and provide services to the public. An Excel spreadsheet downloadable from this website lists the Source Type (Federal, State, or Third Party); Source Name (agency, program, or company name), Dataset Name, and Years Available. (U.S. Census Bureau)*

Affirmatively Furthering Fair Housing (AFFH): *A United States Department of Housing and Urban Development policy which "directs HUD to ensure that the agency and its program participants proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.(U.S. Department of Housing and Urban Development)."*

Community-based organization: *The term "community-based organization" means a public or private nonprofit organization of demonstrated effectiveness that— (A) is representative of a community or significant segments of a community; and (B) provides educational or related services to individuals in the community.*

Community Prioritization: *Also referred to as community preference and local preference. Generally, community prioritization policies "[allow] residents priority access to subsidized housing built in their neighborhoods (Goetz, 2019)."*

Cultural Dissonance: *a sense of discord, disharmony, confusion, or conflict experienced by people in the midst of change in their cultural environment. The changes are often unexpected, unexplained or not understandable due to various types of cultural dynamics.*

Displacement: *"A pattern of change in which current residents are involuntarily forced to relocate, either because they cannot afford to stay in the neighborhood (Reardon et al., 2014) or because of other socioeconomic or environmental pressures making continued residence in the neighborhood infeasible or undesirable (Cohen, 2017)."*

Duration Dependence: *refers to the likelihood of a household moving out based on their length of residence. The basic theory concludes that the risk of moving is sharpest and peaks early on, and then decreases over time. This generally is believed to happen due to people developing ties with their neighborhoods, enticing them to stay put if they are able.*

Fair Housing Act (FHA): *A policy signed into law in 1968 which "prohibit[s] discrimination concerning the sale, rental, and financing of housing based on race, religion, national origin, sex, (and as amended) handicap and family status (U.S. Department of Housing and Urban Development, 2000)."*

Gentrification: "*Gentrification is a pattern of neighborhood change in which a previously low-income neighborhood experiences reinvestment and revitalization, accompanied by increasing home values and/or rents (Reardon et al., 2014)."*

Inclusionary Zoning: *"Inclusionary zoning requires affordable units to be included within new residential development projects or requires payment for construction of such units elsewhere in the community (Butler, 2016)."*

Indicators Tracking System (Displacement): *a continuous tracking tool that incorporates indicators of displacement to determine geographically where displacement pressures are likely to occur in a municipality.*

IRS Filer Ratio: *the ratio of people's tax filing status (ex: married, single, etc). Changes in this ratio can indicate changes in socioeconomic status in a demographic if people are going from married to single or vice versa.*

Local data intermediary: *Compiles data for community use. Acts as an impartial and trusted source of information across many ranges of topics. This makes them slightly different than community indicator programs, which tend to be narrower in scope. However, data intermediaries can be a valuable resource for continual displacement tracking, provided the intermediary sources credible and appropriate data.*

Right to assign: *An assignment of a legal claim occurs when one party (the assignor) transfers its rights in a cause of action to another party (the assignee). 1. Black's Law Dictionary (defining assignment as the transfer of rights or property).*

Right of First Offer: *Before an owner of a Rental Housing Accommodation may offer it for sale to, solicit any offer to purchase from, or accept any unsolicited offer to purchase from any Third-Party Purchaser, they must provide each Qualified Organization the first opportunity to submit a Statement of Interest and to make an offer (CNHED).*

Right of First Refusal: *Before an owner may sell a Rental Housing Accommodation, they must provide each Qualified Organization that submitted a Statement of Interest in response to the Right of First Offer an opportunity to purchase the Rental Housing Accommodation at a price and terms that represent a Bona Fide Offer of Sale (CNHED).*

Smart Cities Movement: *Initiatives within local governments to make cities more efficient and responsive to constituents. Cities with "smart data" movements primarily focus on*

digital tools that collect and analyze user-submitted data, allowing for real time monitoring and control (Chapple & Zuk, 2016).

Tenant Organizations: *means Tenants who have organized themselves as a legal entity that can acquire real property, represents at least a majority of the Rental Units in the Rental Housing Accommodation, has adopted Governing Documents and Governing Principles, and has appointed officers and any other authorized agents specifically designated to execute contracts on its behalf. Households in which no member has resided in the Rental Housing Accommodation for at least 90 days and those households in which any member has been an employee of the owner during the preceding 120 days are ineligible to be members of a Tenant Organization and to be counted toward calculating majority representation (CNHED).*

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