

2005

# Cultural Displacement: Is the GLBT Community Gentrifying African American Neighborhoods in Washington, D.C.?

Chris McChesney

Follow this and additional works at: <http://digitalcommons.wcl.american.edu/tma>

 Part of the [Land Use Planning Commons](#), and the [Property Law and Real Estate Commons](#)

---

### Recommended Citation

McChesney, Chris. "Cultural Displacement: Is the GLBT Community Gentrifying African American Neighborhoods in Washington, D.C.?" *The Modern American*, Spring 2005, 24-27.

This Article is brought to you for free and open access by the Washington College of Law Journals & Law Reviews at Digital Commons @ American University Washington College of Law. It has been accepted for inclusion in *The Modern American* by an authorized administrator of Digital Commons @ American University Washington College of Law. For more information, please contact [fbrown@wcl.american.edu](mailto:fbrown@wcl.american.edu).

---

# Cultural Displacement: Is the GLBT Community Gentrifying African American Neighborhoods in Washington, D.C.?

## **Keywords**

Gentrification, Gay, Lesbian, Bisexual and Transgender (GLBT), African American community, U.S. Census

# CULTURAL DISPLACEMENT: IS THE GLBT COMMUNITY GENTRIFYING AFRICAN AMERICAN NEIGHBORHOODS IN WASHINGTON, D.C.?

By Chris McChesney\*

Washington, D.C. is a city physically divided along 16th Street, NW (Northwest) by race and socioeconomic status. Poverty resides in east D.C. with a large concentration of minority communities, while prosperous and mostly Caucasian residents live in northwest D.C.<sup>1</sup> Starbucks, one of the many cultural amenities that correspond with gentrification, clearly illustrates the divide. Among the nearly 50 Starbucks locations in the District, only three stores are in east D.C. These three Starbucks are all near busy downtown neighborhoods, such as Eastern Market, that are frequented by people from other parts of the city and tourists.<sup>2</sup> Moreover, this same division is not only in the District, but also evident in surrounding Maryland and Virginia counties. The eastern side of the District, along with Prince George's county, MD (the only county adjacent to District's eastern border) accounts for 70% of the region's total black population. However, Jim Graham, a D.C. councilmember, observed that while the division between communities still falls along 16th Street, NW, it has begun to push eastward because of gentrification.<sup>3</sup>

Gentrification is a complex process with both positive and negative effects and various definitions, including one that is synonymous with the revitalization of a community. The definition used in this article closely parallels that of The Brookings Institution Center on Urban and Metropolitan Policy, which defines gentrification as a process in which higher socioeconomic households move into a neighborhood causing the non-voluntary displacement of lower socioeconomic households resulting in a change in the culture of the community.<sup>4</sup> Specifically, this article will explore the validity of the common belief that the Gay, Lesbian, Bisexual and Transgender (GLBT) community is one of the driving forces of gentrification by examining the role of the community in the gentrification of Washington, D.C.

## WASHINGTON, D.C. AND GENTRIFICATION

Councilmember Jim Graham described D.C.'s transformation in the past thirty years as a city that has gone from "a sleepy southern town to a sophisticated world capital."<sup>5</sup> This revitalization may be attributed to gentrification, which is evident in many neighborhoods in the District. As a whole, the city's population, which is predominantly African American, has been on the decline since the 1950s.<sup>6</sup> This decrease in the population size may be due, in part, to a trend of suburbanization in the 1970s and 1980s, mostly driven by middle-class white householders looking to improve the lives of their families by moving out of the city. Beginning in the 1980s, African American residents also began to move out to the suburbs, but constituted only a fraction

of the total new suburban population.<sup>7</sup> However, within the last few years, the migration to the suburbs seems to be reversing within certain demographic groups, such as single professionals. The GLBT community is a significant part of this expanding demographic group.

While the city's total population remains predominantly African American, the current influx of new residents has resulted in a proportional shift in the minority community. In 1990, African Americans accounted for roughly 66% of the D.C. population; in 2000, the number decreased to 60% of D.C.'s total population. Two predominant factors explain the moving trend of single professionals: (1) the attractions of urban life for those with high disposable income and (2) the absence of children, which allows them to live in areas with poorer public schools and provides them with the mobility necessary to adjust to the high crime rates of most cities.<sup>8</sup>

## GENTRIFICATION OF THE AFRICAN AMERICAN COMMUNITY IN WASHINGTON, D.C.

The African American majority is steadily declining,<sup>9</sup> and as one African American resident observed, "'Chocolate City' is rapidly becoming 'Condo City.'"<sup>10</sup> U Street, one of many historically black neighborhoods, is quickly becoming another gentrified area of the city. In September 2004, escalating rent prices forced Sisterspace and Books, one of the last African American local businesses, to close its doors. Many in the community rallied to save the bookstore from the pressures of gentrification, which they compared to colonization.<sup>11</sup> In Columbia Heights, located around the intersection of Columbia Pike and Walter Reed Drive and recently ranked one of the top eight neighborhoods to watch,<sup>12</sup> many residents have been protesting an attempt to close a youth center in order to build luxury condos. Along with the anger resulting from the loss of a safe place for children, many in the area see this initiative as another sign of increasing property value, more white neighbors, and an abrupt shift in their way of life.<sup>13</sup>

In a Washington Post editorial, Colbert King, deputy editor, compares the results of the gentrification of his childhood neighborhood of the 1940s and 1950s to Columbus' 'discovery' of America because "...all we shared and held dear was destroyed."<sup>14</sup> "[L]ost forever ... the sense of community and belonging"<sup>15</sup> is the way King nostalgically recalls his childhood neighborhood and friends. In his time, Foggy Bottom and the West End were working-class neighborhoods; today the gentrified area is home to the Mayor of Washington, D.C.<sup>16</sup> King also frequently highlights the mayor's disregard for "the faceless peo-

ple forced to concentrate in D.C.'s impoverished areas" as the outcome of gentrification; the only viable options suggested by the mayor's office are homeless shelters and public housing.<sup>17</sup> Additionally, the mayor's website touts the Earned Income Tax Credit (EITC), a special city tax break for low- and moderate-income workers designed to assist the lower socio-economic households in D.C.<sup>18</sup>

### THE GLBT COMMUNITY AND DUPONT CIRCLE

While D.C. has a large GLBT population, it pales in comparison to the city's African American population. African American residents account for 60% of D.C.'s population while GLBT households make up less than one percent.<sup>19</sup> The dynamics of the GLBT community's role in the gentrification of African American neighborhoods is difficult to analyze, due in large part to a lack of demographic information regarding the GLBT community. The U.S. Census did not establish a methodology to accurately measure and identify the GLBT community in the United States until 1990. Prior to 1990, a gay couple living together would have been categorized as roommates and therefore indistinguishable from straight roommates.<sup>20</sup> However, despite the efforts of the U.S. Census, it still lacks a method to identify single persons of the GLBT community and thereby makes it difficult to identify GLBT persons in demographic studies. While 3.6% of women and 4.7% of men have had same-sex sexual experiences, only 1.1% of women and 2.5% of men identified themselves as lesbian, gay, or bisexual.<sup>21</sup> Recently, researchers using online surveys have found the percentage of self-identified gays and lesbians to be as high as 6%.<sup>22</sup> In spite of the small total percentage, an overwhelming number of GLBT persons live in cities.

According to the 1990 Census, while 20 U.S. cities accounted for 60% of all gay couples, they only accounted for 26% of the total U.S. population.<sup>23,24</sup> In 1990, Washington, D.C., in particular, was home to 4.42% of all gay couples in the United States while only home to 1.54% of the total US population. Lesbian couples followed the same trend, but not in as high of a percentage. The same 20 cities only accounted for 46% of lesbian couples and D.C. only accounted for 2.84% of lesbian couples.<sup>25</sup> Overall, D.C. had the fourth highest gay population and the fifth highest lesbian population.<sup>26</sup>

The childless factor is thought to be one of the central reasons for D.C.'s large GLBT population. Many gay and lesbian couples do not have children, either out of choice or because of state laws that do not allow homosexual couples to adopt children. In 1990, 95% of gay couples and almost 80% of lesbian couples did not have children.<sup>27</sup> As a result, gays and lesbians were able to spend more money on personal amenities, such as entertainment and living expenses, cultural events unique to Washington, D.C., and more expensive real estate investments.<sup>28</sup> Aside from a lack of children, many GLBT persons fall into a class of people in the higher socio-economic bracket who are often characterized as prioritizing "close proximity to downtown entertainment and cultural venues" and historic architecture

when choosing residency.<sup>29</sup> The conflict within gentrification lies in this shared appreciation of urban culture by both outside parties and pre-existing residents. However, this appreciation has spurred the evolution of Washington, D.C. into an important cultural center for the GLBT community. The large number of gay and lesbian residents within D.C. and the continuing influx of new residents has resulted in the open acceptance of the gay community in several D.C. neighborhoods. Thus, for many GLBT residents, Washington, D.C. symbolizes a cultural haven marked by the celebration and free expression of the GLBT lifestyle.

### DUPONT CIRCLE, D.C.'S GLBT CULTURAL CENTER

Dupont Circle, one of D.C.'s more affluent neighborhoods in west D.C., was once an African American neighborhood and home to low income families. Recently, the zip code that encompasses Dupont Circle (20009) was ranked number 36 in a study of highest home prices in the D.C. metropolitan area, and the average price of a home has nearly doubled in the past three years.<sup>30</sup> According to Dupont Circle Advisory Neighborhood Committee (ANC) member Karyn-Siobhan Robinson, Dupont was predominately African American in the 1960s and several of its buildings had government-assisted housing. Today, Robinson feels it is no longer appropriate to call Dupont the city's "gay ghetto."<sup>31</sup> The area is home to the majority of D.C.'s GLBT households and only two buildings have government-assisted housing.<sup>32</sup>

Dupont Circle, referred to as both the 'gay ghetto' and the 'fruit loop' by locals, is the cultural center for D.C.'s GLBT community. Paul Kafka-Gibbons recently described the circle in his novel entitled *Dupont Circle*: "In Dupont Circle, poor meets rich, old meets young, gay meets straight, native meets new arrival, and the peoples, styles, and languages all squish together."<sup>33</sup> Lambda Rising, a GLBT bookstore, opened its original store in Dupont Circle in 1974.<sup>34</sup> Nearby is a Human Rights Campaign (HRC – the nation's leading GLBT advocacy organization) store and the HRC national headquarters is located near the circle.<sup>35</sup> Recently, The Center, an organization dedicated to helping the local GLBT community, opened in Logan Circle, the neighborhood adjacent to Dupont Circle.<sup>36</sup> The offices of The Washington Blade, D.C.'s weekly GLBT newspaper since 1969 (then called The Gay Blade),<sup>37</sup> and Metro Weekly, D.C.'s GLBT magazine, are also located near the circle.<sup>38</sup> A copy of both can be found on just about any street corner in the Dupont neighborhood. Over 15 bars, clubs, and restaurants in Dupont cater to the GLBT community along with a number of retail stores, such as Universal Gear.<sup>39</sup>

Many annual GLBT cultural events call Dupont Circle home. D.C.'s annual High Heel Race takes place along 17th St., NW (just a few blocks off of the circle) on the Tuesday before Halloween. The race was started eighteen years ago by, "...a bunch of drunk drag queens who had a race." The race is seen by the city as "...truly a community event."<sup>40</sup> Reel Affirmations is the District's international gay and lesbian film festival. While

there is no central location for the festival, tickets can be purchased at many Dupont area stores and one the main theatres is in Dupont.<sup>41</sup> Most notably, Dupont Circle is home to D.C.'s annual Pride Parade.<sup>42</sup>

While Robinson believes gentrification is more a matter of affluence and a lack of people's sensitivity to their surrounding community, she stated that the GLBT community fuels the revitalization of neighborhoods and follows the retreat of the black community eastward.<sup>43</sup> The Logan Circle neighborhood, east of Dupont Circle, is currently experiencing gentrification by the GLBT community. Many younger GLBT persons who wish to live near Dupont can no longer afford to and are now buying up realty in the adjacent Logan Circle neighborhood.<sup>44</sup>

### CONFLICTING INTERESTS

In some areas of the country, gentrification is the source of major conflict between pre-existing black communities and an increasing gay population. In Kirkwood, one of the African American neighborhoods in Atlanta, Georgia, one minister held community meetings to protest what he saw as "the white homosexual and lesbian takeover," of his neighborhood. During one of these meetings, a gay rights group, whose size surpassed the number of concerned community members left in the neighborhood, held their own protest outside.<sup>45</sup>

In contrast, while there has been protest by D.C. residents over gentrification, they have not been directed at the GLBT community.<sup>46</sup> Despite the recognition of the GLBT community as one of the driving forces behind gentrification in D.C., there has been little conflict with the African American community. Ward One, the area home to Columbia Heights, U Street and other neighborhoods feeling the pressures of gentrification, is 44% African American. However, Ward One recently elected an openly gay councilmember, who carried a majority of the vote in several African American precincts.<sup>47</sup>

Robinson does not believe that the two communities have conflicting interests, only different interests. In her opinion, tension arises when those moving into a predominately-black neighborhood are not sensitive to the interests of the pre-existing community.<sup>48</sup> As the GLBT community moves further eastward, the existing residents are forced to learn to live with their new neighbors. On one hand, these old neighborhoods will experience a surge of growth due to the investment and the sheer commercial buying power of the GLBT residents. However, while recognizing that neighborhoods often grow and evolve, Robinson expressed unease that older residents often feel left out of the changes and have concerns of whether the city they call home still values them.<sup>49</sup>

### PUBLIC POLICY AND GENTRIFICATION

Gentrification is not always a bad word to politicians. Many see it as another word for much needed revitalization. Through the revitalization of run down neighborhoods, a city can reduce its concentrations of poverty, upgrade the housing stock by increased property value, and increase revenue from property

taxes.<sup>50</sup> The D.C. council and the federal government have both pursued the revitalization of Washington D.C. by implementing several public policy initiatives, such as tax incentives.<sup>51</sup> Congress, which remains deeply involved in D.C.'s local politics, passed a \$5,000 tax credit to assist first-time homebuyers within the District. This credit has been widely used and has often been an incentive for people to buy homes in the District. In fact, 70% of homebuyers used this credit in 1998.<sup>52</sup> Another method of encouraging neighborhood growth is through public spending. A visible example in D.C. is the Metrorail system, the public subway system which connects different parts of the city as well as to Virginia and Maryland. The opening of a Metro station in Columbia Heights and Shaw multiplied gentrification pressures in the surrounding areas as the area became more accessible and attractive to commercial investment. Additionally, the privately financed Convention Center in Shaw has increased pressure in adjacent neighborhoods.<sup>53</sup> These increased gentrification pressures have lead to a 116% increase in house prices between 2001 and 2004.<sup>54</sup>

In recognition of the investing power of the GLBT community, many cities are increasing efforts to attract GLBT people in their desire to revitalize neighborhoods. In addition to an influx of new investment, the movement of a large GLBT population to an existing community has been shown to increase tolerance for diversity within neighborhoods. Additionally, some studies have shown economic benefits for cities that welcome GLBT people.<sup>55</sup> San Francisco, the city with the highest gay and lesbian concentration, also ranks very high for patents per capita.<sup>56</sup> Several other cities that have large GLBT concentrations also rank very high among other economic indicators.<sup>57</sup> The top 15 high-tech cities, according to the Milken Institute High-Tech Rankings, were also among the cities with the highest gay populations.<sup>58</sup> Washington, D.C. ranked fourth in the high-tech rankings and came in second for the gay index rankings used in the study.<sup>59</sup>

However, the positive economic growth brought on by the GLBT population should not be confused with individual wealth within the community. One misconception is that GLBT professionals are often wealthier than their heterosexual counterparts. While studies show little to no disparity among incomes, gay men on average make less than married men of an equal occupational level.<sup>60</sup> The reason behind the misconception goes back to a lack of children among GLBT people. This creates a large amount of disposable income that helps fuel economic growth, while many married couples save money in order to support their children.<sup>61</sup> Because of this difference in spending patterns, many cities actively try to attract new gay residents. D.C., for example, has amended its definition of domestic partnerships to recognize gay and lesbian couples and give them economic benefits.<sup>62</sup>

### CONCLUSION

Economic revitalization and growth does not automatically result in the gentrification of a neighborhood, but if this growth

proceeds without consideration for the pre-existing neighborhoods, gentrification is the likely result. While the GLBT community's expanding presence in D.C. is not the sole reason for gentrification, it is a driving force. Gays and Lesbians are often more willing to move into areas that have high crime rates and typically seen as run down. Once there, they have a greater potential to renovate their homes leading to many improvements in the neighborhood. This is apparent in Dupont Circle and can already be seen in Columbia Heights.

Not all aspects of gentrification are negative. Some of D.C.'s most prosperous and prestigious areas were once poverty-stricken neighborhoods. While the African American community's opposition to their displacement is understandable, the creation of a new cultural community should be encouraged. A community may lose one of their neighborhoods, but a new minority community then gains a neighborhood. The GLBT community now has a home in Dupont Circle, a place that they can

feel safe and walk down the street openly with their partner. Thus, alongside the economic development has come a new diverse and tolerant culture. The danger in gentrification occurs when there is economic growth without regard for the residents that have historically called the neighborhood home. This causes displacement of older residents and resentment of the newer residents.

While growth is good for the city, leaders must be careful not to overzealously promote a neighborhood's rebirth without addressing the concerns of the existing residents. The district is becoming more diverse and is GLBT friendly, but only half of the city is receiving the benefits. As the nation's capital grows and experiences a "face lift" in many of its neighborhoods due to an increasing number of GLBT professionals, city leaders must be careful not to neglect the African American community and other minorities that contribute to the great diversity within Washington, D.C.

## ENDNOTES

\*Chris McChesney received his BSA from the University of Florida and is currently a first year student at American University Washington College of Law.

<sup>1</sup> *A Region Divided: The State of Growth in Greater Washington, D.C.* 1 (unpublished report, on file at the Brookings Institution Center on Urban and Metropolitan Policy).

<sup>2</sup> Starbucks Store locator, available at <http://www.starbucks.com/retail/locator/default.aspx>. (All the addresses in Washington, D.C. were organized by NW and NE or SE).

<sup>3</sup> Interview with Jim Graham, D.C. Councilmember, Ward One (Jan. 5, 2005) [hereinafter Graham].

<sup>4</sup> Maureen Kennedy & Paul Leonard, *Dealing with Neighborhood Change: A Primer on Gentrification and Policy Choices* 5 (Apr. 2001) [hereinafter Kennedy] (discussion paper, on file with The Brookings Institution Center on Urban and Metropolitan Policy).

<sup>5</sup> Graham, *supra* note 3.

<sup>6</sup> U.S. CENSUS BUREAU.

<sup>7</sup> Dennis E. Gale, *Black and White Urban-to-Suburban Outmigrants: A Comparative Analysis, 1975-1980* (May, 1986) (occasional paper no. 4, on file at Center for Washington Area Studies, George Washington University).

<sup>8</sup> Kennedy, *supra* note 4, at 11.

<sup>9</sup> U.S. CENSUS BUREAU, CENSUS 1990, 2000.

<sup>10</sup> Debbi Wilgoren, *U Street Bookstore Eviction Set; Owners Denounce Corridor's Yuppification, Vow to Resist*, WASHINGTON POST, June 27, 2004, at C1.

<sup>11</sup> *Id.*

<sup>12</sup> *8 Places to Watch*, WASHINGTONIAN, Mar. 2005 at p. 102 (listing attractive neighborhoods based on their expected growth, change, and potential for investment).

<sup>13</sup> Debbi Wilgoren & Jacqueline L. Salmon, *In NW, Condos vs. Clubhouse; Columbia Heights Parents Fear Development Will Elbow Out Children*, WASH. POST, Sep. 5, 2004, at C1 [hereinafter Wilgoren].

<sup>14</sup> Colbert King, *Turning a Deaf Ear to the Displaced*, WASH. POST, Jan. 8, 2005, at A19 (expressing his disappointment in both the city and journalist for ignoring those displaced by gentrification).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

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

<sup>18</sup> District of Columbia Mayor's Office, *Issues & Answers: Earned Income Tax Credit*, available at [http://www.dc.gov/mayor/issues/2005/january/tax\\_credit.shtm](http://www.dc.gov/mayor/issues/2005/january/tax_credit.shtm).

<sup>19</sup> U.S. CENSUS BUREAU, CENSUS 2000.

<sup>20</sup> Dan Black, *Demographics of the Gay and Lesbian in the United States: Evidence from Available Systematic Data Sources*, 37 DEMOGRAPHY 139, 140 (2000) [hereinafter Black].

<sup>21</sup> *Id.* at 142.

<sup>22</sup> Gary Gates, Ruth Eisenberg and Robert Witeck, Remarks at the Tuesday Forum of the Urban Institute (June 3, 2003).

<sup>23</sup> Black, *supra* note 20, at 148 (stating that the U.S. Census data only includes coupled GLBT persons since that is the only GLBT status identified in the collected information).

<sup>24</sup> U.S. CENSUS BUREAU, *Technical Note on Same-Sex Unmarried Partner Data from 1990 and 2000 Censuses*, Census Alert, available at <http://www.census.gov/population/www/cen2000/samesex.html> (There are discrepancies between the 1990 and 2000 same-sex partners status due to a change in how the Census handles two people of the same sex who respond that they are a married couple. In accordance

with the 1996 Federal Defense of Marriage Act (H.R. 3396) the Census cannot recognize such entries because the federal government only recognizes opposite-sex married couples).

<sup>25</sup> Black, *supra* note 20, at 148.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.* at 150.

<sup>28</sup> *Id.* at 152-153.

<sup>29</sup> Kennedy, *supra* note 4, at 11-12.

<sup>30</sup> *Golden Zip Codes*, WASHINGTONIAN, Mar. 2005 at 100-101.

<sup>31</sup> Interview with Karyn-Siobhan Robinson, Dupont Circle Advisory Neighborhood Committee Member (Jan. 5, 2005) [hereinafter Robinson].

<sup>32</sup> *Id.* (implementing Census 2000 data of same-sex partners living together and a corresponding Census 2000 map broken up by Census Tract).

<sup>33</sup> PAUL KAFKA-GIBBONS, DUPONT CIRCLE, (1st Marine ed., Mariner Books 2002).

<sup>34</sup> Lambda Rising Bookstores & Oscar Wilde Bookshop, at <http://www.lambdarising.com>.

<sup>35</sup> Human Rights Campaign, at <http://www.hrc.org>.

<sup>36</sup> The Center: Home for GLBT Metro D.C., at <http://www.thedcenter.org>.

<sup>37</sup> *About Us*, Washington Blade Online, at <http://www.washblade.com/kiosk/index.cfm>.

<sup>38</sup> Metro Weekly Online, at <http://www.metroweekly.com>.

<sup>39</sup> *Where to find the Blade*, Washington Blade Online, at <http://www.washblade.com/distribution/>; *Where to get Metro Weekly*, Metro Weekly Online, at [http://www.metroweekly.com/about\\_us/where.php/](http://www.metroweekly.com/about_us/where.php/).

<sup>40</sup> Will O'Bryan, *Racing Against the Rules*, METRO WEEKLY, October 21, 2004.

<sup>41</sup> Reel Affirmations, at <http://www.reelaffirmations.org>.

<sup>42</sup> Capital Pride, at <http://www.capitalpride.org>.

<sup>43</sup> Robinson, *supra* note 31.

<sup>44</sup> *Guide to Gay Washington, D.C.*, Slash D.C. at <http://www.gaybazaar.com/dc/nightlife/washington.php>.

<sup>45</sup> Sean Scully, *In Atlanta, God, Gays and Gentrification; Pastor Decries Influx of White Homosexuals in Black Area*, WASHINGTON TIMES, June 10, 1998, at A1.

<sup>46</sup> Wilgoren, *supra* note 13.

<sup>47</sup> Graham, *supra* note 3.

<sup>48</sup> Robinson, *supra* note 31.

<sup>49</sup> *Id.*

<sup>50</sup> Kennedy, *supra* note 4, at 5.

<sup>51</sup> *Id.* at 12.

<sup>52</sup> *Id.* at 56.

<sup>53</sup> *Id.*

<sup>54</sup> *Hot Neighborhoods*, WASHINGTONIAN, March 2005 at p. 99.

<sup>55</sup> Richard Florida and Gary Gates, *Technology and Tolerance: The Importance of Diversity to High-Technology Growth 4* (June 2001) [hereinafter Florida] (survey series, on file at The Brookings Institution Center for Urban and Metropolitan Policy).

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> Florida, *supra* note 55.

<sup>59</sup> *Id.*

<sup>60</sup> Black, *supra* note 20, at 152.

<sup>61</sup> Wilgoren, *supra* note 13.

<sup>62</sup> 29 D.C.M.R. 80.