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Houston, We Have a Gentrification Problem: The Gentrification Effects of Local Environmental Improvement Plans in the City of Houston

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**HOUSTON, WE HAVE A GENTRIFICATION PROBLEM: THE
GENTRIFICATION EFFECTS OF LOCAL ENVIRONMENTAL
IMPROVEMENT PLANS IN THE CITY OF HOUSTON**

Madeline Marguerite Byers[†]

Abstract

Local environmental improvement plans are increasingly popular among urban planners. As climate change and environmental justice concerns increase, many communities demand a change in local land use policies that put these concerns at the forefront. One such community is the city of Houston, Texas, which issued several environmental improvement plans in recent years after the devastation of Hurricane Harvey. As used in this Comment, an environmental improvement plan is a local government planning initiative that aims to implement positive environmental change in urban areas historically burdened by environmental hazards. Such neighborhoods are often undeveloped, low-socioeconomic communities blighted by an accumulation of hazardous pollutants. These communities lack open, green space, clean and affordable natural resources, and resiliency against natural disasters. However, when cities successfully implement environmental improvement plans, targeted neighborhoods often undergo gentrification, thereby displacing the poorer community members into another area blighted by the same environmental hazards the plan was intended to protect them from. This Comment seeks to explore the intended benefits of Houston's various environmental improvement initiatives, to evaluate the current gentrification trends in Houston neighborhoods targeted for improvement, and to highlight the potential future concerns for

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vulnerable Houston neighborhoods as these new land-use policies go into effect. Environmental improvement plans are an important and necessary aspect of responsible and sustainable development, but, if implemented without regard to possible gentrification effects, they can have negative, unintended consequences on a city's diversity and economic health. Fortunately, there are ways that city planners and community members can mitigate these negative effects and ensure positive change and inclusive growth.

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I. INTRODUCTION

Environmental improvement plans benefit communities. But when municipalities do not evaluate the potential, negative consequences of gentrification, these plans can displace vulnerable communities. Houston has an opportunity to ensure inclusive growth and to avoid displacement as it develops and implements its environmental improvement plans. This Comment provides insight as to what those plans are and recommends specific policy measures that Houston, and

other municipalities, can adopt in order to ensure inclusive growth throughout the environmental improvement process. These recommendations include: incorporating incentives into improvement plans to encourage affordable housing and access to community services; prioritizing environmental justice to provide equal access to environmental benefits to all communities; facilitating stakeholder involvement, local government transparency, and community education; and identifying and removing racial and income barriers in gentrifying neighborhoods.

In the wake of Hurricane Harvey and an expected population boom¹, Houston is looking for ways to ensure inclusive and sustainable growth.² Houston officials, private developers, and community activists have all participated in the process of creating and implementing some of Houston's most recent environmental improvement plans. Houston released its Brownfields Strategic Plan to "restore urban land, natural resources, and historically and culturally significant landmarks into valued community assets."³ More recently, Houston released two more environmental improvement plans: The Houston Climate Action Plan⁴ and Houston Incentives for Green Development.⁵ The Houston Climate Action Plan lists the city's "strong history of implementing effective and practical programs and policies that establish a competitive market advantage" and its commitment "to adopt, honor, and uphold the goals of the Paris Climate Agreement" as primary reasons for adopting the plan.⁶ The

1. See Elizabeth Korver-Glenn et al., *Environmental Equality in Neighborhood Amenities and Planning: A Houston, Texas, Case Study*, 10 ENVTL. JUST. 193, 194 (2017); Jonathan Hilburg, *Houston Unveils Post-Harvey Downtown Master Plan*, THE ARCHITECT'S NEWSPAPER (Nov. 13, 2017), <https://archpaper.com/2017/11/houston-harvey-master-plan/> [<https://perma.cc/4BU9-P4V6>].

2. Am. Inst. of Architects Hous., *Houston: Growth, Challenges, and Opportunities*, AIA HOUSTON, <https://aiahouston.org/v/site-page/Houston-2020-Visions/Houston-Growth-Challenges-and-Opportunities/9d/> [<https://perma.cc/J9TQ-7SEJ>] (last visited May 13, 2020).

3. EnSafe Inc., *Brownfields Strategic Plan 3* (September 21, 2017), <https://www.houstontx.gov/brownfields/City-of-Houston-Brownfields-Strategic-Plan.pdf> [<https://perma.cc/5UB8-LRHY>] [hereinafter BSP].

4. City of Houston, *Houston Climate Action Plan Draft Outline Recommendation for Public Comment* (July 25, 2019), <http://greenhoustontx.gov/climateactionplan/2019-DRAFT-CAP.pdf> [<https://perma.cc/28PD-Y8XL>] [hereinafter CAP].

5. Michael F. Bloom, P.E. & R.G. Miller Engineers, Inc., *Houston Incentives for Green Development* (Aug. 2019), <http://www.houstontx.gov/igd/documents/igd-report-final.pdf> [<https://perma.cc/932R-EW9L>] [hereinafter HIFGD].

6. CAP, *supra* note 4, at 2.

Houston Incentives for Green Development plan, however, was designed with the goal of mitigating environmental disasters.⁷ Thus, three of Houston's primary development goals are: cultivating cultural enrichment, advancing capitalism and boosting market efficiency in historically blighted areas, and mitigating environmental disaster effects and raising climate change awareness. By implementing these environmental improvement plans, Houston may be prepared to face environmental challenges in the future. However, there remains some concern about Houston's ability to achieve these goals without encountering the negative consequences of gentrification.⁸ Thus, the question is whether the environmental improvement plans of the most diverse city in America are able to provide a more sustainable and healthier urban environment to all communities.

This Comment will answer four questions: (1) What are Houston's environmental improvement plans? (2) How will those plans meet the city's needs concerning its response to natural disasters, its carbon footprint, and its accommodation of its ever-growing, racially diverse population? (3) What are the possible economic and cultural consequences of implementing those plans? and (4) How can Houston officials prevent displacement and ensure positive change and inclusive growth going forward? First, this Comment will briefly discuss the current trend towards green initiatives in urban planning and why cities should implement environmental improvement plans. Next, this Comment will explain how environmental improvement plans can cause gentrification, a process known as "environmental gentrification." Then it will explain the positive and negative impacts that environmental gentrification has on a city's local economy and racial diversity. This Comment will then explore the objectives and initiatives in three of Houston's current environmental improvement plans and evaluate what Houston is doing to build and maintain a greener urban environment without displacing lower-income residents or lowering its community diversity. Finally, this Comment will recommend four ways that Houston's city council, and the city councils of other municipalities, can ensure inclusive growth and prevent displacement when implementing its environmental improvement plans. Specifically, this Comment will recommend that

7. HIFGD, *supra* note 5, at 3.

8. Erin Douglas, *Houston Gentrifying Faster Than Other Texas Cities*, *Fed Analysis Finds*, HOUSTON CHRONICAL (Jan. 8, 2020), <https://www.houstonchronicle.com/business/economy/article/Houston-gentrifying-faster-than-other-Texas-14957465.php> [<https://perma.cc/D824-6Q9C>].

cities incorporate provisions to incentivize inclusive development, prioritize environmental justice, encourage community involvement, and remove racial and income barriers.

II. GENTRIFICATION & ENVIRONMENTAL IMPROVEMENTS

A. *The Trend Towards Green Living*

In recent years, green, sustainable development that builds adaptive cities resistant against sprawl and environmental disasters has been trending in the field of urban planning.⁹ One reason for this could be population increase, which has produced public concern about the sustainability of natural resources. According to the United States Census Bureau, the population of the United States will rise to over 344 million by 2025.¹⁰ With more growth and development, the largest cities in the United States need newer and stronger amenities to accommodate more people.¹¹ Further, as population density increases, urban communities may “struggle to mitigate harmful environmental consequences that stem from unsustainable and inequitable growth models.”¹² Deteriorating quality of natural resources, decreasing access to natural resources, overconsumption of nonrenewable energy, and accumulation of toxic chemicals and pollutants in public air, water, and soil, are only a few examples of the consequences caused by a substantial lack of environmentally oriented planning.¹³ Thus,

9. Cailin Crowe, *7 Trends That Will Define Smart Cities in 2020*, SMARTCITIESDIVE (Jan. 2, 2020), <https://www.smartcitiesdive.com/news/7-trends-that-will-define-smart-cities-in-2020/569471/> [https://perma.cc/D9X5-NXGZ]; James Brasuell, *Urban Planning Trends to Watch in 2020*, PLANETIZEN (January 9, 2020, 7 AM), <https://www.planetizen.com/features/107990-urban-planning-trends-watch-2020> [https://perma.cc/3732-UZPK]; *The Decade Ahead: Design & Cities in 2020 and Beyond*, SMITHGROUP (Dec. 19, 2020), <https://www.smithgroup.com/perspectives/2019/the-decade-ahead-design-cities-in-2020-and-beyond> [https://perma.cc/HGR6-WQF2] [hereinafter SMITHGROUP]; *Sustainability Trends That Will Shape the 2020's*, ECOENCLOSE (Oct. 21, 2019), <https://www.ecoenclose.com/blog/sustainability-trends-that-will-shape-the-2020s/> [https://perma.cc/3HNA-WSYF].

10. *Projected Population Size and Births, Deaths, and Migration Table 1 Main Series*, U.S. CENSUS BUREAU, <https://www.census.gov/data/tables/2017/demo/popp/roj/2017-summary-tables.html> [https://perma.cc/CYH7-NNX4].

11. Richard Florida, *The Fastest-Growing U.S. Cities Aren't What You Think*, CITYLAB (August 21, 2019), <https://www.citylab.com/life/2019/08/job-ranking-top-cities-population-growth-census-data-us/596485/> [https://perma.cc/WKT6-45P2].

12. SMITHGROUP, *supra* note 9; see also David E. Ervin et al., *Growing Cities Depend on Ecosystem Services*, 2 SOLUTIONS 74, 74–75 (2012).

13. See Sarah Fox, *Environmental Gentrification*, 90 U. COLO. L. REV. 803, 812-

environmental improvement plans to “go green” are gaining popularity in large cities across the country.¹⁴

Regardless of the reasons for the trend towards green living, it is important for city officials to ensure their communities develop in a way that is healthy, sustainable, and friendly to the environment because “[h]ow and where communities develop affects human health and the environment.”¹⁵ While “greener” does not always equate to “healthier,” there is evidence that living in a clean environment could be better for an individual’s health.¹⁶ For example, residents living in a neighborhood with high concentrations of hazardous facilities and environmental harms are more likely to suffer from cancer, asthma, and overall poorer health.¹⁷ Further, cities have a responsibility to ensure healthy and sustainable growth because of the problematic effects of climate change, namely environmental disasters.¹⁸ The past decade presented some of the worst environmental disasters faced by coastal cities in particular. The effects of climate change, at least in part, brought about these disasters.¹⁹ Recent record-breaking storms often flood people out of their homes, expose communities to harmful industrial pollutants, and cause damage to non-resilient infrastructure, costing cities millions of dollars.²⁰ Therefore, the local government’s interests in protecting its citizens’ health and mitigating the environmental harms of natural disasters are at least two primary reasons for cities to take environmental action.

One way cities can take environmental action is to develop and implement environmental improvement plans.²¹ Specifically, cities can incorporate environmental improvement initiatives and strategies into a comprehensive plan that establishes sustainable, resilient development of neighborhoods previously prone to environmental

13, 817 (2019).

14. *Id.* at 813.

15. U.S. Env’tl. Prot. Agency, *Why Does EPA Work on Smart Growth Issues?*, EPA, <https://www.epa.gov/smartgrowth/about-smart-growth#why> [<https://perma.cc/HJL5-N26M>].

16. See Jennifer R. Wolch et al., *Urban Green Space, Public Health, and Environmental Justice: The Challenge of Making Cities ‘Just Green Enough’*, 125 *LANDSCAPE & URB. PLAN.* 234, 235–36 (2014).

17. See Shea Diaz, *Getting to the Root of Environmental Injustice: Evaluating Claims, Causes, and Solutions*, 29 *GEO. ENVTL. L. REV.* 767, 768-69 (2017).

18. See Brie Sherwin, *After the Storm: The Importance of Acknowledging Environmental Justice in Sustainable Development and Disaster Preparedness*, 29 *DUKE ENVTL. L. & POL’Y F.* 273, 273–74 (2019).

19. *Id.* at 273.

20. *Id.*

21. See *Why Does EPA Work on Smart Growth Issues?*, *supra* note 15.

disaster, hazardous pollutants, or a lack of green space.²² For example, environmental improvement initiatives are manifest in local plans to build parks, implement green development, reduce exposure to hazardous industrial chemicals, or increase urban sustainability and resilience against environmental disasters.²³ Environmental improvement initiatives are also manifest in plans to revitalize neighborhoods,²⁴ improve community aesthetics,²⁵ and generally advance economic growth.²⁶ When an environmental improvement plan improves overall environmental health and amenities,²⁷ they create renewed interest in an add value to a previously contaminated, undesirable area.²⁸ Therefore, environmental improvement plans have the potential to “reduce the environmental impacts of buildings and development and enhance the community’s health and economy.”²⁹

B. *Gentrification as a Result of Environmental Improvements*

As explained above, environmental improvement plans are tools that municipalities use to improve overall environmental health and enhance natural urban amenities. This improvement leads to a better quality of life and, therefore, an increased desirability of the improved area. Because of this secondary effect, whether or not it is the primary reason for implementing the plan, a municipality’s successful implementation of an environmental improvement plan often correlates with environmental gentrification.³⁰ Gentrification is an expansive term that researchers use to describe a range of impacts that can result from a change in the makeup of a community.³¹ As such, the term can take on different meanings depending on the particular interest in focus.³² Generally speaking, however, gentrification is

22. See Fox, *supra* note 13, at 806; see also Diaz, *supra* note 17, at 786.

23. Fox, *supra* note 13, at 806.

24. Diaz, *supra* note 17, at 787.

25. See *id.*

26. *Id.*

27. See Fox, *supra* note 13, at 813.

28. Fox, *supra* note 13, at 803–04, 806.

29. U.S. Env’tl. Prot. Agency, *Location and Green Building*, EPA, <https://www.epa.gov/smartgrowth/location-and-green-building> [<https://perma.cc/P77M-M9S7>] (last visited Jan. 19, 2020).

30. Fox, *supra* note 13, at 803.

31. See Fox, *supra* note 13, at 803; see also Ingrid G. Ellen, *Can Gentrification Be Inclusive?*, in *A SHARED FUTURE: FOSTERING COMMUNITIES OF INCLUSION IN AN ERA OF INEQUALITY* 334, 334 (Christopher Herbert et al. ed., 2018).

32. Compare Miriam Zuk et. al., *Gentrification, Displacement and the Role of Public Investment: A Literature Review* 7 (Fed. Reserve Bank of S.F., Working Paper No. 2015-05) (defining “gentrification” as the displacement of African-

often associated with the migration of wealthy residents into low-income neighborhoods.³³ Environmental gentrification describes changes to a neighborhood that result from environmental improvements. When environmental improvements increase the property value of an area that has historically been prone to environmental harm or a lack of green space, attracting new, higher-income residents as a result, the improvements are said to have catalyzed the gentrification process of environmental gentrification.³⁴

There are many possible reasons for a change like this to occur, but the pertinent reason for this Comment is the increased desirability of an area.³⁵ Much like the process of “regular” gentrification, environmental gentrification makes an area more desirable, thereby raising property values and taxes in that area.³⁶ High desirability and increased housing prices narrowly attract wealthy residents who can afford to pay higher prices.³⁷ Conversely, an increase in housing prices affects existing low-income residents by overwhelming them with a sudden increase in property tax, making them susceptible to displacement.³⁸ Thus, like “regular” gentrification, environmental gentrification has the potential to displace the very people that policymakers intended to help with the improvements.³⁹ This harmful displacement effect, as well as the positive environmental and economic impacts of environmental gentrification, are explained in more detail below.

1. Displacement as a Result of Increased Property Values

Communities that undergo environmental gentrification are at risk of isolating existing low-income minority residents, leaving only new,

Americans by White Americans), with Lena Edlund, Cecilia Machado, & Maria Sviatschi, *Gentrification and Rising Returns to Skill 5* (IZA, Discussion Paper No. 9502) (measuring “gentrification” in terms of number of “skilled jobs”), and Ellen, *supra* note 31, at 334 (defining “gentrification” as relative increase in household income in initially low-income neighborhoods due to some kind of neighborhood change).

33. Richard Florida, *The Complicated Link Between Gentrification and Displacement*, CITYLAB (Sept. 8, 2015, 9:42 AM), <https://www.citylab.com/equity/2015/09/the-complicated-link-between-gentrification-and-displacement/404161/> [<https://perma.cc/8TEJ-JAKN>].

34. Fox, *supra* note 13, at 810–11; see Diaz, *supra* note 17, at 786.

35. Fox, *supra* note 13, at 803.

36. *Id.* at 811.

37. *Id.* at 807.

38. *Id.* at 807, 811.

39. Diaz, *supra* note 17, at 786.

wealthy (often white) residents in the area.⁴⁰ This happens when polluted grey neighborhoods receive cleaner water and air, additional green space, water features, and outdoor recreational areas.⁴¹ Because these environmental improvements have such a positive impact on the health, aesthetics, and overall quality of life of a community, improved neighborhoods become more desirable to both current and prospective residents.⁴² As a byproduct of environmental improvement, property values increase, causing an influx of newer, wealthier residents into the area.⁴³ As property values increase, new residents who can afford to pay the higher taxes and rent begin to occupy areas previously dominated by low-income residents, displacing the existing residents who cannot afford to live in the area anymore.⁴⁴ This shift in socioeconomic demographics creates a shortage of affordable housing in the area, effectively pushing existing low-income residents out of the desirable area.⁴⁵

A change in socioeconomic demographics encourages further displacement by leading to a change in local services. The departure of existing residents along with the influx of new residents may, in the long-term, cause changes in community services.⁴⁶ A change in community services can then trigger “further relocation of residents who are dissatisfied with those changes or find that the community no longer suits their needs.”⁴⁷ Thus, the migration of wealthy residents into a low-income neighborhood often, but not always,⁴⁸ results in the displacement of low-to-moderate-income households.⁴⁹ In that case, the benefits of the environmental improvement plan end up exclusively conferred on higher status residents, thereby depriving the existing residents those benefits.⁵⁰

Because of the possibility of displacement, it is important for those who design and implement environmental improvement plans to understand how and why displacement happens and how to mitigate

40. See Fox, *supra* note 13, at 804, 815.

41. *Id.* at 821.

42. *Id.*

43. *See id.*

44. *See id.* at 803.

45. *Id.* at 806.

46. *Id.* at 808.

47. *Id.*

48. See Adam Eckerd, *Cleaning Up Without Clearing Out? A Spatial Assessment of Environmental Gentrification*, 47 URB. AFF. REV. 31, 35 (2011); see also Diaz, *supra* note 17, at 787-88; Ellen, *supra* note 31, at 335.

49. See Fox, *supra* note 13, at 807, 811; Ellen, *supra* note 31, at 334.

50. Eckerd, *supra* note 49, at 32.

it. Generally speaking, displacement effects are not at the forefront of policymakers' considerations during the planning process.⁵¹ Even when they are, policymakers rarely incorporate concrete provisions to mitigate these potential displacement impacts.⁵² Particularly, when a plan's objective is to increase commerce and housing demand, mitigating displacement is not usually a policymaker's top priority.⁵³ This is especially problematic for larger diverse cities.⁵⁴ Large, diverse cities, like Houston, looking to implement environmental improvement plans face the challenge of being able to implement green initiatives and ensure that the benefits from those initiatives are available to everyone—not just those who can afford to pay more.⁵⁵

2. Benefits to Local Economies

Although environmental improvement plans have the potential to displace low-income minority communities,⁵⁶ environmental gentrification is not necessarily a bad thing in and of itself. Vulnerable communities are at risk of displacement when a plan lacks the appropriate mitigating measures. Displacement, however, is not guaranteed to occur in every case of environmental gentrification.⁵⁷ Further, environmental gentrification has many positive environmental and economic benefits. Recall that one of the reasons a city may choose to implement an environmental improvement plan is to revitalize a previously underdeveloped and blighted area historically burdened by environmental hazards.⁵⁸ Thus, environmental improvement plans can serve as a tool for urban revitalization—the distinguishing characteristic of an environmental improvement plan being that its economic goals are achieved via initiatives that are centered less around capitalism and more around creating a healthier, more sustainable living space. In this way,

51. Fox, *supra* note 13, at 807.

52. *Id.*

53. *See id.*

54. *See generally* Korver-Glenn et al., *supra* note 1, at 807 (demonstrating the unequal access to benefits of environmental improvements and amenities in the Houston area, which arise from environmentally unjust planning).

55. *See* Fox, *supra* note 13, at 807; *see also* Sherwin, *supra* note 18, at 294. Strategies for mitigating displacement and ways in which officials can ensure inclusive growth are discussed in Part IV of this Comment. *See infra* p. 126.

56. Fox, *supra* note 13, at 806–07.

57. *See* Eckerd, *supra* note 49, at 35–36, 38; *see also* Diaz, *supra* note 17, at 787–88.

58. *See* Fox, *supra* note 13, at 815.

revitalization and increased capital are positive secondary effects of implementing an environmental improvement plan.

This revitalization and increase in capital are brought about by a plan's environmental improvements that result in a cleaner, healthier living environment and increased access to natural resources, making an area more desirable. For example, green-infrastructure development, a broad and ongoing initiative that increases neighborhood resilience and sustainability, is a common improvement initiative that can make a community more desirable.⁵⁹ Environmental improvement plans that include green-infrastructure as a primary initiative can encompass a range of activities and strategies such as "increasing tree cover, improving air quality and energy efficiency, finding ways to lower a city's overall carbon footprint, decreasing the number of impermeable surfaces found in the urban environment, and many others."⁶⁰ This is done by "building compactly and putting a mix of [land] uses close together," thereby using fewer resources and increasing energy efficiency.⁶¹ In turn, this helps protect natural resources and "reduce polluted stormwater runoff" and "mak[es] it easier for people to drive less if they choose."⁶² Further, compact-development allows more room for green spaces and minimizes impervious surfaces.⁶³ Thus, an environmental improvement plan that couples compact-building with an emphasis on renewable resources and green infrastructure not only yields a healthier environment, but also makes the community more resilient to environmental disaster by capturing and filtering rainwater.⁶⁴ In plans where this initiative is part of a city-wide effort, the activities and strategies are often merely incentivized and their impact diffuse, making it difficult to measure the impacts on isolated neighborhoods.⁶⁵ Generally speaking, however, the overall impact is to reduce air and water pollution and increase energy efficiency, thereby adding value and desirability to urban property.⁶⁶

Another example of a popular environmental improvement initiative is to increase green space. Local government efforts to create open park spaces or other outdoor recreational amenities improve

59. *See id.* at 819.

60. *Id.* at 819–20.

61. *Location and Green Building, supra* note 29.

62. *Id.*

63. *Id.*

64. *See id.*

65. Fox, *supra* note 13, at 820.

66. *Id.* at 819–20.

local residents' quality of life and the urban environment's overall health.⁶⁷ Not only does greening a space convert underutilized grey-infrastructure into a source of community recreation and improved health, but it is also aesthetically pleasing to look at, thereby adding value to the neighborhood. The challenge cities face with green space initiatives is a lack of space to convert.⁶⁸ Truly underutilized urban parcels are a very rare occurrence, especially in high-density supercities.⁶⁹ Some cities are forced to be creative to get around this problem;⁷⁰ however, environmental improvement plans often have special funding to create open outdoor spaces that enhance community connectivity and environmental health.⁷¹ Whether a green space is introduced to an individual neighborhood⁷² or spans multiple neighborhoods, these amenities are a popular way for municipalities to improve the urban environment and add value to a neighborhood.⁷³

Another environmental improvement that results in revitalization and increased property values is brownfields cleanup projects.⁷⁴ "Brownfields" is a term that often refers to land used primarily for industrial manufacturing.⁷⁵ While brownfields are notoriously contaminated by hazardous substances or harmful pollutants, their contamination levels usually fall below a certain statutory threshold.⁷⁶ Nonetheless, living near a brownfield site poses numerous health risks such as exposure to contaminated water and dangerous vapors, which causes a host of greater health issues.⁷⁷ Accordingly, cleaning up brownfields not only increases the use and enjoyment of an otherwise industrial graveyard, but also improves the health of local residents by eliminating environmental hazards.⁷⁸

Moreover, cleaning up brownfields is a promising initiative for local environmental improvement plans when secondary revitalization

67. *Id.* at 819.

68. *See id.* at 817.

69. *Id.*

70. *See id.* at 818.

71. *Id.*

72. *Id.* (offers the High Line in New York and the 606 in Chicago as example of highly-local greening projects).

73. *Id.* at 818–19.

74. *See generally* Kevin Haninger et al., *The Value of Brownfield Remediation*, 4 J. ASS'N ENVTL. & RESOURCE ECONOMISTS 197 (2017) (examining the environmental and economic benefits of brownfield clean-up).

75. Fox, *supra* note 13, at 813.

76. *Id.*

77. *Id.* at 814.

78. *Id.*

effects are desired.⁷⁹ Local governments that implement plans to clean up brownfields or add green space to a neighborhood can spark developers' interests, causing an increase in property buyout before the cleanup even begins.⁸⁰ Thus, it appears that some city governments deliberately allow environmental gentrification to take place, whereas big developers only follow suit as signs of economic opportunity in the city arise.⁸¹ This is likely due to the overwhelming transformation of a brownfield community when local governments implement these plans.

All of these initiatives achieve sustainable, resilient, low-impact development that mitigate climate change effects and prevent future environmental harm. These primary effects create a healthier living space, which boosts the local economy as the area becomes more desirable to live in. Thus, homeowners in improved neighborhoods experience increased financial health.⁸² As property values increase, homeowners gain appreciation of significant assets regardless of whether they choose to stay.⁸³ Further, homeowners and non-homeowners alike can take advantage of the increased number of new businesses and services in the neighborhood that accompany the environmental improvements.⁸⁴ Therefore, gentrification by environmental improvement has a number of benefits on both the environmental and economic health of a local community.

C. *Environmental Gentrification & Local Diversity*

So far, this Comment has identified environmental gentrification as a secondary effect of environmental improvement plans. This effect occurs when an increase in the desirability of an area inevitably leads to an increase in property value, thereby attracting newer, wealthier residents to the neighborhood.⁸⁵ Although environmental gentrification has a number of economic benefits, it can displace the existing low-income, minority residents in the improving area if left unchecked. As such, environmental gentrification not only affects the environment and economy of local communities, but also the racial

79. Haninger et al. *supra* note 74, at 197–98.

80. Fox, *supra* note 13, at 815.

81. Alan Ehrenhalt, *The “G” Word*, GOVERNING, February 2015, at 25, 26, https://drjdbij2merew.cloudfront.net/GOV/GOV_Mag_Feb15.pdf [<https://perma.cc/9B9H-2KWU>].

82. Fox, *supra* note 13, at 821.

83. *Id.*

84. *Id.*

85. *Id.*

makeup of a community. This Section will explain the paradox that environmental gentrification can increase the diversity of residents while at the same time exclude minority residents.

1. Increased Integration & Community Diversity

Because environmental gentrification attracts wealthier, often white, residents into the area, the intermingling of community demographics can lead to an increase in cultural diversity.⁸⁶ There is evidence that “affluent white households are opting for diverse, city neighborhoods over high-income, racially homogenous suburbs in far greater numbers than they did in earlier decades.”⁸⁷ In a 2019 study exploring “the long-term trajectory of predominantly minority, low-income neighborhoods that gentrified over the 1980s and 1990s,” researchers found that gentrifying neighborhoods “experienced little racial change.”⁸⁸ Further, researchers saw an increase in the number of high-income white residents “choosing to move into racially and economically diverse, central city neighborhoods rather than only considering the higher income, white enclaves that they have traditionally selected.”⁸⁹ Although those neighborhoods gentrified, “a significant minority became racially integrated” and remained racially stable over the long term.⁹⁰ Thus, not only do these newer, wealthier residents bring in money for the local economy, but they also spur racial integration, thereby increasing racial diversity.⁹¹ As such, concerns about gentrification should not lead environmental justice and fair housing advocates to discourage higher income, white households from moving into low-income, minority neighborhoods; rather, these concerns should lead advocates to insist on adequate policy interventions that “secure and stabilize the integration these moves create.”⁹²

86. Ellen, *supra* note 31, at 334.

87. *Id.*; see also Ingrid G. Ellen & Gerard Torrats-Espinosa, *Gentrification and Fair Housing: Does Gentrification Further Integration?*, 29 HOUSING POL’Y DEBATE 835, 847 (2019).

88. Ellen & Gerard Torrats-Espinosa, *supra* note 87, at 836.

89. *Id.* at 847.

90. *Id.* at 836.

91. *Id.* at 847; Ellen, *supra* note 31, at 334.

92. Ellen & Gerard Torrats-Espinosa, *supra* note 87, at 848.

2. Excluding Minority Residents

Although environmental gentrification potentially increases integration and community diversity, without proper policies in place to solidify that integration, gentrification can push minority residents out as white residents move in.⁹³ This is because minority residents are more vulnerable to displacement due to their disproportionately lower socioeconomic status as compared to white residents.⁹⁴ These “[d]istributional inequities are very likely rooted in past and present racial hostility, racial stereotypes, and other forms of race discrimination.”⁹⁵ For example, minority individuals are more likely to face reduced job opportunities due to unlawful discrimination.⁹⁶ Similarly, due to systemic racial and ethnic discrimination, minority individuals “may be less likely to enjoy the economic, educational, or personal positions necessary to exploit” the few jobs that do exist or any new jobs that environmental improvements create.⁹⁷ Thus, given that ethnic minority status and low socioeconomic backgrounds are highly intertwined, the displacement of low-income residents in a gentrifying neighborhood can potentially lower community diversity and homogenize community culture.⁹⁸

Further, the exclusion of minority residents in neighborhoods experiencing gentrification raises environmental justice concerns.⁹⁹ Residents of environmentally burdened neighborhoods are “most often members of minority racial and ethnic groups.”¹⁰⁰ Again, this is due to systemic discrimination, resulting in unequal enforcement of environmental protections and a lack of political power compared to high-income, racial majority residents.¹⁰¹ As such, minority residents are more likely to be negatively affected by environmental gentrification because city officials target their neighborhoods for environmental clean-up at a higher rate than other, more affluent

93. Ellen & Gerard Torrats-Espinosa, *supra* note 87, at 847; Ellen, *supra* note 31, at 334.

94. Richard Lazarus, *Pursuing “Environmental Justice”: The Distributional Effects of Environmental Protection*, 87 NW. U. L. REV. 787, 795 (1993).

95. *Id.* at 825.

96. *Id.* at 795.

97. *Id.*

98. See Jonathan Spader et al., *Fostering Inclusion in American Neighborhood*, in *A SHARED FUTURE: FOSTERING COMMUNITIES OF INCLUSION IN AN ERA OF INEQUALITY* 22, 23 (Christopher Herbert et al. ed., 2018).

99. See generally Lazarus, *supra* note 95, at 795 (discussing the connection between racial minority disadvantages and environmental injustice).

100. See Spader et al., *supra* note 98, at 23.

101. Diaz, *supra* note 17, at 777-79.

neighborhoods. It is not surprising then that both socioeconomic status and race are often linked to negative environmental harms and risks.¹⁰² For example, low-income, minority residents are more likely to live in flood-prone neighborhoods, away from enhanced green spaces, and near hazardous industrial areas.¹⁰³ Further, minority communities are more likely to suffer negative health effects because of environmental harms and risks.¹⁰⁴ These injustices are some of the very problems that environmental improvement plans aim to remedy; however, gentrification only perpetuates these harms if policymakers do not actively combat displacement.¹⁰⁵

This harm continues because one's socioeconomic status primarily predicts one's ability to relocate.¹⁰⁶ As such, when low-income, minority residents who have long suffered environmental harms are displaced, they are often forced into another undesirable community. In this way, displacement effects deprive minority residents of the opportunity to enjoy the environmental improvements that were intended for them in the first place.¹⁰⁷ This raises environmental justice concerns regarding the disproportionate exposure to environmental harm and the inequitable distribution of and access to environmental benefits.¹⁰⁸ Therefore, displacing minority residents into a low-socioeconomic, albeit more affordable, neighborhood creates the risk of exposing these minority communities to yet another environmentally hazardous living space. Thus, without adequate policy intervention to ensure inclusive growth, city officials risk excluding minority residents and perpetuating environmental injustice.

III. HOUSTON'S ENVIRONMENTAL IMPROVEMENT PLANS

Having explained what environmental gentrification is, how it is catalyzed, and its positive and negative consequences on local communities, this Section will now apply those concepts to Houston's environmental improvement plans. First, this Section will highlight the reasons why Houston has a special interest in implementing

102. Sherwin, *supra* note 18, at 296; Diaz, *supra* note 17, at 769.

103. Sherwin, *supra* note 18, at 296; Diaz, *supra* note 17, at 769; Fox, *supra* note 13, at 817.

104. Sherwin, *supra* note 18, at 273–74; Diaz, *supra* note 17, at 769; Fox, *supra* note 13, at 814.

105. See Sherwin, *supra* note 18, at 296; Diaz, *supra* note 17, at 769.

106. Sherwin, *supra* note 18, at 296.

107. Fox, *supra* note 13, at 808.

108. *Id.*

environmental improvement plans. Second, this Section will explore the objectives and initiatives seen in three of Houston's current environmental improvement plans and will evaluate how or whether those plans will build and maintain a greener urban environment without displacing low-income residents or lowering Houston's diversity.

A. *The Need for Environmental Improvement*

Now more than ever, Houston needs a balanced environmental improvement plan that addresses the city's need for sustainable and resilient development and avoids environmental justice problems. One reason is because Houston faces an increase in extreme weather events. According to the National Oceanic and Atmospheric Administration, the world's five hottest years have occurred since 2015, with 2019 being the second hottest year in 140 years of record-keeping.¹⁰⁹ Hurricane Harvey first made landfall on August 25, 2017 and was the second costliest storm since 1900.¹¹⁰ Notably, Harvey's environmental harms afflicted low-income neighborhoods more so than white, high-income neighborhoods.¹¹¹ Therefore, by mitigating natural disaster impacts, Houston also potentially addresses environmental injustice concerns.

Scientists have shown that Gulf Coast cities are particularly vulnerable to the record-breaking storms seen in recent years.¹¹² Houston is certainly no exception. Hurricane Harvey cost the city \$125 billion dollars in damage.¹¹³ Not only did the storm empty Houston's pockets, but it also caused numerous environmental harms, including flooding 800 wastewater treatment facilities and thirteen Superfund sites (i.e., toxic chemical dumping sites); spreading toxic industrial chemicals like lead and arsenic; leaking millions of gallons of untreated sewage across the city; carrying sediment, debris, and other pollutants directly to residents backyards; causing storm-related shut-downs and start-ups that released large amounts of volatile

109. John Bateman, *2019 Was 2nd Hottest Year on Record for Earth Say NOAA, NASA, NAT'L OCEANIC & ATMOSPHERIC ADMIN.* (Jan. 15, 2020), <https://www.noaa.gov/news/2019-was-2nd-hottest-year-on-record-for-earth-say-noaa-nasa> [https://perma.cc/S5ME-ZJ5T].

110. Chris Huber, *2017 Hurricane Harvey*, WORLD VISION (September 7, 2018), <https://www.worldvision.org/disaster-relief-news-stories/2017-hurricane-harvey-facts> [https://perma.cc/KAE5-KS84].

111. Sherwin, *supra* note 18, at 273, 275–76.

112. *Id.* at 273–74.

113. *Id.* at 275.

organic compounds into the air; and exposing residents to extremely high levels of e-coli, lead, and arsenic.¹¹⁴ Unfortunately, concerns about environmental disasters do not end with Harvey as the city averages about forty-five inches of rain annually and faces a 1% chance per year of suffering another storm like Harvey.¹¹⁵ “The science behind the changing weather patterns for Houston is undeniable.”¹¹⁶ As Houston continues to face extreme weather events, the city will suffer detrimental environmental harms if left unmitigated. Therefore, one incentive for an environmental improvement plan is mitigating the harmful impacts of natural disasters.

In addition to extreme weather events, Houston expects a tremendous increase in population in the near future, which will further strain Houston’s environmental management. “[c]ity officials are expecting a population boom from 7,500 to 30,000 over the next 20 years, and are calling for the construction of 12,000 new residential units [in downtown alone] to deal with the demand.”¹¹⁷ Houston is already the fourth most populous city in the country.¹¹⁸ One concern with an increase in concentrated urban life is the pressure it puts on ecosystem services.¹¹⁹ High density populations in urban areas present numerous developmental challenges for cities that want to simultaneously support a growing population and commercial activity while maintaining a healthy ecosystem for greener living environments.¹²⁰ As of six years ago, Houston in particular was “one of the largest per capita greenhouse gas emissions in the country with 14.9 metric tonnes of CO₂ per capita per year.”¹²¹ This means that in 2014 alone “residents and businesses generated nearly 35 million tons of greenhouse gases through carbon-fueled buildings, cars, and waste.”¹²² So as populations, jobs, and buildings grow in the coming years, Houston’s emissions also grow. Therefore, like many other large cities in the U.S., Houston has begun pushing green incentives

114. *Id.* at 284–85.

115. *Id.* at 286.

116. *Id.*

117. Hilburg, *supra* note 1.

118. *The 200 Largest Cities in the United States by Population 2020*, WORLD POPULATION REVIEW, <http://worldpopulationreview.com/us-cities/> [https://perma.cc/JB7R-BVCQ] (last visited Jan. 20, 2020) (using U.S. Census Bureau data).

119. *See* Ervin, *supra* note 12, at 74–75.

120. *See id.* at 74.

121. CAP, *supra* note 4, at 2.

122. *Id.*

to the forefront of its land use policy agenda because of its expected population boom and its attendant pressure on local ecosystems.

Finally, not only is Houston a populous city, it is also the most diverse city in the country—both culturally and socioeconomically.¹²³ A highly diverse, highly dense population puts special pressure on Houston to foster rapid yet inclusive growth. This is because, without adequate policy intervention to ensure long-term integration, the displacement effects of environmental gentrification risks losing that precious diversity that makes Houston so unique. Thus, Houston should be on high alert to make sure its plans don't disadvantage low-income, minority residents. More generally, Houston needs to define an ambitious agenda for its future environmental improvement plans, paying particular attention to environmental justice so it can avoid the harmful aspects of environmental gentrification.¹²⁴

B. *Environmental Improvement Objectives from Three of Houston's Current Plans*

So far, this Comment explained how executing environmental improvement plans can have both positive and negative effects and laid out why Houston has a particular interest both in strengthening its environmental policies and prioritizing inclusive growth when doing so. This Section will explore three of Houston's environmentally oriented development projects: the Houston Brownfields Strategic Plan, the "Climate Action Plan," and Houston's Incentives for Green Development. Specifically, it will walk through each project's intended benefits, how adequately those benefits address the environmental concerns Houston faces, and which neighborhoods they are aimed at improving.

1. Houston Brownfields Strategic Plan

Houston implemented its Brownfields Strategic Plan ("BSP") as part of its Brownfields Redevelopment Program ("BRP") to "restore urban land, natural resources, and historically and significant landmarks into valued community assets."¹²⁵ The mission of Houston's BRP is to revitalize core neighborhoods (i.e.,

123. Adam McCann, *Most Diverse Cities in the U.S.*, WALLETHUB (Apr. 10, 2019), <https://wallethub.com/edu/most-diverse-cities/12690/> [<https://perma.cc/T7FP-VNXC>].

124. CAP, *supra* note 4, at 2.

125. BSP, *supra* note 3, at ii.

neighborhoods inside the “inner loop” of interstate 610);¹²⁶ catalyze sustainable economic growth; ensure a safe and clean environment; improve quality of life for Houston residents; and “create thriving, livable neighborhoods in [Houston].”¹²⁷ Examples of BRP projects include an increase in “senior housing complexes, townhomes, [golf courses], neighborhood parks, and commercial mixed use or industrial properties.”¹²⁸ The purpose of the BSP is to “understand how Houston’s BRP can incentivize redevelopment of brownfield properties, catalyze community revitalization efforts, and facilitate collaboration between community stakeholders and public resources throughout the city.”¹²⁹ In other words, the BSP is meant to serve as a guide for decision-making and site selection of areas that are to receive environmental assessment or cleanup funding.¹³⁰ More specifically, the BSP “has one key objective: to identify brownfields redevelopment opportunities that are aligned with the priorities of the BRP and publicly supported economic development initiatives in Houston.”¹³¹

The BSP is a strong example of an environmental improvement plan that has gentrification or urban revitalization as the reason for implementing the improvements primary. Recall that environmental improvement plans sometimes intentionally bring about gentrification consequences and incorporate gentrification into the plans as initiatives. The intended benefits of the BSP reveal Houston’s aim to increase property values and bring about the secondary benefits associated with that increase by assessing and prioritizing communities’ environmental needs. In doing so, Houston plans to clean up neighborhoods “disproportionally impacted by multiple brownfields sites” and to “[mitigate] issues of...adverse environmental concerns in these neighborhoods.”¹³² As such, the BSP targets fourteen economically distressed neighborhoods.¹³³ In

126. *Id.* at 13 (defining “core neighborhoods” and areas of focus).

127. *Brownfields Redevelopment Program*, CITY OF HOUSTON, <http://www.houstontx.gov/brownfields/> [<https://perma.cc/8BQX-JUMM>] (last visited Jan. 20, 2020) [hereinafter BRP].

128. BSP, *supra* note 3, at 2.

129. *Id.* at ii.

130. *Id.* at 3.

131. *Id.* at ii.

132. *Id.* at 4.

133. *Id.* at iii; the targeted neighborhoods include: Acres Homes, Denver Harbor/Port Houston, Downtown (including East Downtown Neighborhood), Greater Fifth Ward, Gulfton, Gulfgate/Pine Valley, Kashmere Gardens, Lawndale/Wayside, Magnolia Park, Near Northside, Old Spanish Trail/South

particular, of the fourteen neighborhoods, the BSP prioritizes four neighborhoods that are home to primarily low-income, racial minority residents.¹³⁴ This selection was “[b]ased on a detailed evaluation of community need and the capacity to achieve tangible and measurable results...”¹³⁵ The plan recommends that the BRP create and implement “mini-plans” for community engagement and environmental cleanup in these neighborhoods.¹³⁶

Because the BSP is relatively new, there is no neighborhood-specific data collected to determine whether this plan has had the intended gentrification impact since the BSP’s publication. However, data comparison between 2012 and 2017 suggests that an increase in property value was already underway at the time the BSP was published. In 2012, the median household incomes in the four minority neighborhoods were approximately \$30,000, \$21,000, \$39,000, and \$30,000.¹³⁷ The minority median household income is compared to a city-wide median income of \$44,648 and a high of \$122,353.¹³⁸ In 2017, the year of the BSP’s implementation, the median household income of the four targeted neighborhoods was approximately \$39,000, \$30,000, \$40,000, and \$36,000.¹³⁹ This is compared to Houston’s highest income neighborhood with a median income of \$95,682 and a city-wide median income of \$46,187.¹⁴⁰ Thus, while no data directly affirms the revitalization effects of the BSP since its publication, that revitalization efforts were already underway in these neighborhoods at the time of BSP’s publication suggests BRP projects lead to revitalization effects in targeted neighborhoods.

Further, since 2005, Houston redeveloped its BRP efforts over 75 sites and restored more than 3,000 acres of city land to beneficial use.¹⁴¹ In turn, the city raised \$5 million in tax revenue, leveraged over

Union, Pleasantville Area, Second Ward, and Third Ward.

134. *Id.* Those neighborhoods are: Second Ward, Greater Fifth Ward, Third Ward, and Near Northside.

135. *Id.*

136. *Id.*

137. *Id.* at 14. Neighborhood income order: Second Ward, Greater Fifth Ward, Third Ward, and Near Northside, respectively.

138. *Id.*

139. HOUS. PLANNING & DEV. DEP’T, *Median Household Income City of Houston by Super Neighborhoods* (Sept. 2017), https://www.houstontx.gov/planning/Demographics/docs_pdfs/SN/Median-Household-Income.pdf [<https://perma.cc/AZF7-ZHT7>] (using 2011-2015 ACS data from U.S. Census Bureau). The neighborhood income order is: Second Ward, Greater Fifth Ward, Third Ward, and Near Northside, respectively.

140. *Id.* (using 2011-2015 ACS data from U.S. Census Bureau).

141. BSP, *supra* note 3, at 2.

\$800 million in investment for cleanup and redevelopment, and created over 4,000 new jobs.¹⁴² Examples of successful BRP projects include a park, a community green space, a performing arts center, and an aquarium.¹⁴³ Revitalization projects like these likely contributed to the increase in median income in neighborhoods near downtown, which has increased by 67% between 2000 and 2015.¹⁴⁴

Of course, such revitalization success (i.e., gentrification) in historically low-socioeconomic neighborhoods raises concerns about displacement of racial minority residents. However, a comparison of racial and ethnicity data for the four primarily minority neighborhoods included in the BSP between 2012 and 2017 does not show a dramatic change in racial diversity. That is, the racial and ethnic makeup of these neighborhoods remained dominated by racial minority residents despite an increase in median income. Specifically, neighborhoods that were primarily Hispanic¹⁴⁵ or Black¹⁴⁶ remained primarily Hispanic or Black.¹⁴⁷ Further, the ratio of white residents to racial minority residents in those neighborhoods remained relatively the same despite the increase in median income between 2012 and 2017.¹⁴⁸ Only one neighborhood showed a decrease in black residents with an increase in white residents; however, there was also an increase in Asian and Hispanic residents.¹⁴⁹ Further, Black and Hispanic residents still made up the majority of that neighborhood's

142. *Id.*

143. *Id.* Specifically, those projects are: Minute Maid Park, Discovery Green, Hobby Center for the Performing Arts, and the Downtown Aquarium.

144. Andy Olin, *Big Texas Cities are Rapidly Gentrifying, but None as Fast as Houston*, RICE KINDER (Jan. 8, 2020), <https://kinder.rice.edu/urbanedge/2020/01/08/neighborhoods-texas%E2%80%99s-biggest-cities-are-gentrifying-and-it%E2%80%99s-happening-fastest-houston> [https://perma.cc/9EXE-3Z8B] (analyzing data collected by a Federal Reserve Bank in Dallas).

145. *Compare* HOUS. PLANNING & DEV. DEP'T, *Race/Ethnicity City of Houston by Super Neighborhoods* (Sept. 12, 2012), http://www.houstontx.gov/planning/Demographics/docs_pdfs/SN/sn_coh_race_eth_n.pdf [https://perma.cc/5HPR-Z7HG] (using 2010 PL94-171 data from U.S. Census Bureau), *with* HOUS. PLANNING & DEV. DEP'T, *Ethnicity City of Houston by Super Neighborhoods* (Sept. 2017), https://www.houstontx.gov/planning/Demographics/docs_pdfs/SN/Ethnicity.pdf [https://perma.cc/W8XT-MCKB] (using 2011–2015 ACS data from U.S. Census Bureau) (comparing statistics for Second Ward and Near Northside).

146. *Id.* (comparing statistics for Third Ward).

147. *Id.*

148. *Id.*

149. *Id.* The neighborhood was the Greater Fifth Ward.

population.¹⁵⁰ This corresponds with the overall race and ethnicity trends city-wide; in 2012, 25.6% of Houston’s population was white, 23.1% was black, 5.9% was Asian, and 43.8% was Hispanic.¹⁵¹ As of 2019, 24.6% of Houston’s population is white, 22.5% is black, 6.9% is Asian, and 44.8% is Hispanic.¹⁵² Thus, although Houston race and ethnicity trends reveal a .6% decrease in the overall black population, it is not clear that this change in demographics is the direct result of the BSP’s revitalization progress, nor is it conclusive evidence of displacement.¹⁵³ Section IV will discuss in more detail some reasons why Houston’s BRP appears to have increased the value of these neighborhoods without displacing racial minority communities—at least so far.

2. The “Climate Action Plan”

The purpose of the Houston Climate Action Plan¹⁵⁴ (“CAP”) is to continue the city’s “legacy” of “implementing effective and practical programs and policies that establish a competitive market advantage.”¹⁵⁵ The plan also declares the city’s commitment to “honor[ing] and uphold[ing] the goals of the Paris Climate Agreement” as one of the primary reasons for adopting the plan.¹⁵⁶ The main goal of the CAP is to “develop strategies and evidence-based measures that will not only help minimize the [c]ity’s carbon footprint and the negative outcomes of climate change, but also create more resilient communities, reduce harmful pollution, cut energy waste, and boost the local economy.”¹⁵⁷ More specifically, the CAP features four main initiatives: transportation, energy transitions, building

150. *Id.*

151. HOUS. PLANNING & DEV. DEP’T, *supra* note 145, at 4 (using 2010 PL94-171 data from U.S. Census Bureau).

152. *Quick Facts*, U.S. CENSUS BUREAU (July 1, 2019), <https://www.census.gov/quickfacts/houstoncitytexas> [<https://perma.cc/A3U9-LCH5>].

153. *Contra* Douglas, *supra* note 8.

154. This Comment evaluates Houston’s final outline of the Climate Action Plan, published in July 2019 for the public to review. An official plan is scheduled for drafting and implementation some time in 2020. CAP, *supra* note 4, at 2. As of February 2020, there is no official plan published by Houston. For expected timeline, see Lara Cottingham, *City of Houston Climate Action Plan: Southwest Multiservice Center Community Meeting 17* (Apr. 6, 2019), <http://greenhoustontx.gov/climateactionplan/20190406-presentation.pdf> [<https://perma.cc/EPY2-XMDB>].

155. CAP, *supra* note 4, at 2.

156. *Id.*

157. *Id.*

optimization, and materials management.¹⁵⁸ The plan uses baseline emissions and pollution data from 2014 to analyze and track the city's progress in improving the "health, safety, and economic benefits of various development and policy options that could bring Houston closer to a carbon-neutral future."¹⁵⁹ Therefore, through the CAP, Houston is at least attempting to address the increasing concern of natural disaster impact and the environmental harms associated with grey infrastructure and a heavily industrialized community.

In evaluating the city's environmental impact and assessing its environmental health, Houston's CAP successfully recognizes that "sustainability and resiliency go hand in hand." This is a promising indication of the benefits this environmental improvement plan should bring for Houston's communities. But will implementing these sweeping environmental initiatives also bring the negative consequence of gentrification to vulnerable neighborhoods (i.e., low-socioeconomic and racial minority neighborhoods)? Because the environmental initiatives are so sweeping, the plan does not aim any particular initiative at any one community; rather, the plan outlines improvement goals for the city as a single community. Section IV of this Comment explains in more detail how a lack of neighborhood targeting could mean a stronger focus on community development and therefore inclusive growth.

3. Houston Incentives for Green Development

It appears that Houston created the Houston Incentives for Green Development ("HIFGD") plan in response to the aftermath of Hurricane Harvey, specifically designed to address flooding and drainage challenges.¹⁶⁰ The plan conveys the city's desire to move away from its history of rapid development of "traditional gray infrastructure" and move forward with "new and innovative approaches for achieving greater flood resilience in Houston."¹⁶¹

158. *Id.* at 4.

159. *Id.* at 2.

160. See SYLVESTER TURNER, *Message from the Mayor*, in HIFGD, *supra* note 5, at 3. Although these incentives are still in the planning phase, the report includes an implementation schedule. Jen Rice, *Houston Could Launch New Incentives for Green Development*, HOUSTON PUBLIC MEDIA (August 21, 2019, 3:55 PM), <https://www.houstonpublicmedia.org/articles/news/local/2019/08/21/343526/houston-could-launch-new-incentives-for-green-development/> [https://perma.cc/5KKP-JFGB]. Full implementation of a revised incentives program is set to occur in early 2022. HIFGD, *supra* note 5, at 36.

161. *Id.* at 3. Houston's mayor, Sylvester Turner, announced on August 19, 2019,

Further, it proposes that “[m]ore green infrastructure in private land development projects will bring economic, social, and environmental benefits to the city while enhancing the resilience of our neighborhoods.”¹⁶² Thus, the goal and the purpose behind the creation of the HIFGD plan directly address the city’s concerns about the impact of environmental disasters, both past and future, as well as a desire for a more resilient city structure.

To formulate the plan, the city hired consultants R.G. Miller Engineers, Asakura Robinson, Corona Environmental Consulting, and Neptune Street Advisors to recommend ways to incentivize green development.¹⁶³ In forming this plan, the city also engaged with organizations in the development industry and subjected the plan to “extensive review by [c]ity departments.”¹⁶⁴ A report containing the proposed incentive packages outlined environmentally-friendly developmental elements and incentives to entice builders to incorporate those elements into their projects.¹⁶⁵ The plan included recommendations for city ordinances that would incentivize development of increased green space, permeable pavement, rainwater harvesting, and flood mitigation.¹⁶⁶ Among these incentives are tax incentives, a quicker permitting process, and new awards and recognition.¹⁶⁷

Like the CAP, concerns about whether the intended gentrification effects of the HIFGD plan will have a negative impact on vulnerable communities can only be speculated in the abstract. This is because, like the CAP, there are no specifically targeted neighborhoods the HIFGD plan aims to benefit. Instead, the HIFGD plan highlights green building techniques to use in the upcoming development brought about by both the CAP and other resiliency projects the city

that the city of Houston intends to actively promote green building and infrastructure, something Environment Texas had been pleading for Houston to do for several years. *Houston to Offer Green Infrastructure Incentives*, ENVIRONMENT TEXAS (Aug. 19, 2019), <https://environmenttexas.org/news/txe/houston-offer-green-infrastructure-incentives> [<https://perma.cc/W47J-35JE>].

162. HIFGD, *supra* note 5, at 3.

163. Jen Rice, *Houston Could Launch New Incentives for Green Development*, HOUSTON PUBLIC MEDIA (Aug. 21, 2019), <https://www.houstonpublicmedia.org/articles/news/local/2019/08/21/343526/houston-could-launch-new-incentives-for-green-development/> [<https://perma.cc/HB24-JH55>].

164. HIFGD, *supra* note 5, at 3.

165. Rice, *supra* note 163.

166. *Id.*

167. *Id.*

implemented through Harvey recovery programs.¹⁶⁸ Thus, while this plan offers more specific ways in which the city can achieve some of the sweeping goals seen in the CAP, its intended benefits are meant to positively impact all Houston communities, as Houston strives to make green development an “integral part of how Houston ‘builds forward’ to address our flooding challenges...and neighborhood beautification.”¹⁶⁹

IV. ENSURING INCLUSIVE GROWTH: CURRENT EFFORTS & FURTHER RECOMMENDATIONS

In the previous Section, this Comment explored three of Houston’s more environmentally oriented development projects. Specifically, the Section walked through the intended benefits for each project, how adequately those benefits address the environmental concerns Houston faces, and which neighborhoods they are aimed at improving. The remainder of this Comment will describe two solutions for displacement effects: meaningful community involvement and incorporating built-in provisions for affordable housing and maintaining economic diversity. These solutions will then be applied to Houston’s preliminary environmental improvement plans to evaluate whether those plans include mitigating policies that allow for inclusive growth and long-term integration. Finally, this Section concludes with recommendations for Houston’s policymakers, and the policymakers of other municipalities, to consider when implementing environmental improvement plans.

A. Houston’s Efforts to Mitigate Displacement

The possibility of displacement might not be at the forefront of policymakers’ considerations, but maybe it should be. Recall that solidifying integration and ensuring inclusive growth in gentrifying areas requires adequate policies that safeguard against displacement. One of the most effective ways to minimize the displacement effect of environmental gentrification is to ensure meaningful involvement with local government transparency and improvements that are “just green enough.” Meaningful community involvement of all community stakeholders, from the early decision-making process through implementation, must be concrete so as to not simply give “lip service

168. HIFGD, *supra* note 5, at 42.

169. *Id.*

to this aspiration.”¹⁷⁰ First, one concrete way local officials can achieve meaningful community involvement is by being transparent. Transparency on the municipality’s part about the plan’s goals and how to achieve those goals is the only way active community involvement can be meaningful and effective.¹⁷¹ Transparency requires the municipality to honestly disclose plan objectives, various industry roles, and the expected changes in community lifestyle and culture that will result.¹⁷² Transparency about the identity of the industry stakeholders is paramount to community involvement because it balances the involvement of regular citizens against the resources and expertise that biases industry input.¹⁷³ Further, informing the public about the intended outcome of implementing an improvement plan allows the public to understand the ways in which the community will change. In doing so, residents can weigh in on whether the suggested plan meets the housing, services, and infrastructure needs of the community, which allows officials to tailor the plan’s initiatives to the community’s needs.¹⁷⁴

Second, local officials can achieve meaningful community involvement by planning around shared community interests. Forming environmental improvement plans strictly around the interests and needs of a targeted community is likely to result in a “just green enough” outcome without introducing a totally different landscape.¹⁷⁵ Such an outcome is “shaped by community concerns, needs, and desires rather than either conventional urban design formulae or ecological restoration approaches.”¹⁷⁶ In this way, community involvement that uses “just green enough” strategies simultaneously improves urban living space and prevents displacement by fostering the kind of healing and growth that environmental improvements provide.¹⁷⁷ The key to getting the amount of green “right” is keeping the projects local.¹⁷⁸ Therefore, gathering community input is required

170. Diaz, *supra* note 17, at 792.

171. *See id.* at 792–94.

172. *See id.* at 792.

173. *See id.* at 792–93.

174. *See id.*

175. *See* Wolch, *supra* note 16, at 241.

176. *Id.*

177. *See* Elizabeth Daigneau, *Just Green Enough*, GOVERNING (Feb. 2015) at 54, https://drjdbij2merew.cloudfront.net/GOV/GOV_Mag_Feb15.pdf [<https://perma.cc/9B9H-2KWU>]; Wolch, *supra* note 16, at 241.

178. *See* Wolch, *supra* note 16, at 241.

in order to implement only those changes that give the community what it needs.¹⁷⁹

Another effective way to minimize displacement by environmental gentrification is through provisions that expressly include inclusive growth measures. Anti-displacement provisions that are built into the framework of an improvement plan make it easier for officials to evaluate direct, indirect, and cumulative community impacts throughout the implementation of the plan.¹⁸⁰ It is important to note, however, that anti-displacement efforts can fail in the long term if they are narrowly applied to individuals through legal representation or tenant-based vouchers.¹⁸¹ Instead, anti-displacement provisions incorporated into environmental improvement plans should focus on maintaining economic diversity in the long term.¹⁸² For example, improvement plans should incorporate provisions that preserve affordable housing in the area.¹⁸³ If subsidized housing is preserved in a gentrifying area, then the area will be better equipped to foster economic and racial integration over time.¹⁸⁴ There are some challenges with this approach, however. One challenge is that the preservation of subsidized housing requires a constant and substantial flow of capital.¹⁸⁵ Further, incentivizing privately owned, subsidized housing to remain subsidized in an area experiencing high demand from high-paying residents can be just as challenging.¹⁸⁶ The same is true of incentivizing landlords to keep affordable rent rates.¹⁸⁷ This particular challenge forces policymakers to weigh the importance and value of integration against saving money by failing to preserve low and middle-income housing in gentrifying areas.¹⁸⁸

This solution is best executed in tandem with meaningful community involvement. Identifying community needs and interests can help weigh such difficult decisions by limiting desired outcomes to those that cater to the specific needs of a community.¹⁸⁹ Further, transparency about this trade-off informs community stakeholders about the plan's objectives and the positive and negative changes that

179. *See id.*

180. Diaz, *supra* note 17, at 797.

181. Ellen, *supra* note 31, at 336.

182. *See id.*

183. Ellen, *supra* note 31, at 336; *see* Olin, *supra* note 144.

184. Ellen, *supra* note 31, at 336; Ellen & Torrats-Espinosa, *supra* note 87, at 835.

185. Ellen, *supra* note 31, at 336.

186. *Id.* at 336–37.

187. *Id.* at 337.

188. *Id.*

189. *Id.*

attend them. Disseminating this information makes residents' input on the value and importance of integration and anti-displacement efforts more meaningful, resulting in more effective anti-displacement provisions.

Two of the three environmental plans from Houston have the potential to mitigate displacement through both meaningful community involvement and built-in anti-displacement provisions. First, the BSP appears to acknowledge the importance of stakeholder involvement and have built-in provisions that address individual community needs. The program was born out of community involvement and is centered around the continued partnership with industry, community, and non-profit organizations.¹⁹⁰ This collaboration with the community is especially valuable for neighborhoods that are primarily minority. In a survey conducted by Rice University, 65% of residents in one of the impacted neighborhoods reported high "collective efficacy" scores based on questions about whether they would help a neighbor in need in various scenarios.¹⁹¹ In 2016, 64% of residents from the same neighborhood voted in public elections compared to 46% of residents state-wide.¹⁹² Further, 25% of the neighborhood's residents reported that they participated in a "civic engagement group" compared to the national average of 15%.¹⁹³ Thus, the city's engagement with community activists in these vulnerable neighborhoods ensures the voices of those who are vulnerable to displacement are heard.

Not only are the needs of active residents acknowledged, but the BSP also appears to incorporate the needs of the communities it targets into the provisions of the plan. The plan evaluates data taken from a survey of 6,129 community members that identifies more than 18,387 needs.¹⁹⁴ "From affordable housing, flooding, and food deserts to walkable streets and increasing transportation options," the plan considers how Houston residents' needs are as diverse as the people making up these communities.¹⁹⁵ These needs and interests are then

190. BRP, *supra* note 127.

191. Elizabeth Trovall, *As Gentrification Looms, New Research Shows What's At Stake for Houston's Third Ward*, HOUSTON PUBLIC MEDIA (Nov. 12, 2019, 11:36 AM), <https://www.houstonpublicmedia.org/articles/news/2019/11/12/351078/as-gentrification-looms-new-research-shows-whats-at-stake-for-houstons-third-ward/> [<https://perma.cc/XXC5-GDZ5>].

192. *Id.*

193. *Id.*

194. BSP, *supra* note 3, at 11.

195. *Id.*

turned into mini-plan initiatives for environmental cleanup in these neighborhoods.¹⁹⁶ In this way, the BSP is formulated with “just green enough” strategies in mind. That is, it is centered around a detailed evaluation of specific community goals and a community’s specific capacity to achieve those goals.¹⁹⁷ Transparency is also achieved through this narrow focus on “just green enough” strategies because the municipality’s goals are directly based on the input of the community stakeholders. Thus, so long as Houston officials continue to work with targeted communities and tailor BSP projects to meet specific community needs, the implementation of BSP projects should continue to provide environmental improvements without displacing minority residents.

Houston’s CAP also incorporates meaningful community involvement and provisions to fight displacement. The CAP expressly states that its strategies were “recommended by community stakeholders brought together by the [c]ity over the past few months and were evaluated for technical feasibility by [the city’s] partners.”¹⁹⁸ Thus, Houston has at least shown its awareness of the importance of community involvement in the early stages of formulating an environmental improvement plan. Unlike the BSP, however, the CAP’s broad improvement goals are shaped more by “conventional urban design formulae or ecological restoration approaches”¹⁹⁹ and less by specific community stakeholder input. Applying such generic objectives city-wide risks overlooking the possibility of displacement and environmental injustice. This concern is somewhat lessened by how each initiative in the CAP is outlined with strategies and activities that both the city and local communities can do to achieve each initiative.²⁰⁰ Including this measure suggests that Houston aims to concentrate more on community involvement throughout the final plan’s execution.

The CAP also includes a few built-in provisions aimed at anti-displacement and maintaining economic diversity. For example, “affordability,” “cost-saving,” and “accessibility” are cited as “additional co-benefits” of the plan’s implementation.²⁰¹ Specifically, under “Transportation Strategies,” one of the city’s goals is entirely

196. *Id.* at 23.

197. *Id.* at 15.

198. CAP, *supra* note 4, at 2.

199. Wolch, *supra* note 16, at 241.

200. CAP, *supra* note 4, at 6–13.

201. *Id.* at 4.

focused on providing equitable mobility and “[p]rovid[ing] vulnerable populations with transit cost offsets.”²⁰² While acknowledging these benefits in the framework of the plan suggests Houston’s awareness of their importance, mere acknowledgement does not mean these provisions will be established. However, because the CAP is still in early stages of development and its benefits are intended to provide for all of Houston’s communities, mere acknowledgement is at least a moderate indication that built-in provisions could be incorporated into the final CAP draft.

The HIFGD plan is the only plan that incorporates neither meaningful community involvement nor built-in anti-displacement provisions. One of the primary purposes of the HIFGD plan is to bring about environmental gentrification. Four out of the seven “green stormwater infrastructure” techniques the HIFGD plan recommends list an “increase in property value” as a “developer benefit” while an “increase in property tax revenue” is listed as a “public benefit.”²⁰³ Further, when discussing tax abatement as an incentive, the plan specifies that tax abatement incentives “should be marketed to developers who are planning to build projects . . . that . . . will catalyze nearby property value increases.”²⁰⁴ Prioritizing increases in property value and tax revenue, and limiting incentives on the condition that these outcomes occur suggests that flood mitigation and environmental gentrification alone shaped the HIFGD plan. While such initiatives are not harmful in and of themselves, they can be harmful if left to operate on their own. Without assurance that all communities will receive these benefits, the plan risks neglecting areas where developers are less likely to build (e.g., poorer neighborhoods impeded by environmental harm). Such neighborhoods are usually the most likely to benefit from the environmental and economic benefits that the HIFGD plan offers. Even if these neighborhoods do receive improvement benefits, the HIFGD plan does not contain anti-displacement provisions or incentives for affordable housing to keep low-income residents in the area in the long term. Thus, the HIFGD plan differs from the BSP and the CAP. Houston implemented the BSP and the CAP to ensure that environmental benefits were extended to low-income, environmentally hazardous neighborhoods or all neighborhoods, respectively. The HIFGD, however, calls for broad application of generic improvement approaches with no consideration

202. *Id.* at 7.

203. HIFGD, *supra* note 5, at 16-17, 21-22.

204. *Id.* at 27.

for community involvement or anti-displacement provisions. Thus, the final HIFGD plan must contain a community engagement initiative and modify incentives to encourage affordable housing and public community green space in neighborhoods that need improvements the most.²⁰⁵

B. *Recommendations for Houston & Other Municipalities’
Policymakers*

Based on the mitigation solutions outlined above, this Comment recommends four ways Houston, and other municipalities implementing environmental improvement plans, can foster inclusive growth and protect community diversity in gentrifying neighborhoods. First, municipalities should offer tax incentives that make green infrastructure options more attractive to developers. These incentives provide the environmental and economic benefits of environmental improvements while limiting the extent and type of development in a given area.²⁰⁶ Policies that “harness the market” through incentives can be effective even in competitive markets.²⁰⁷ For example, city officials could offer property tax incentives or low-interest renovation loans to developers of low-rent, unsubsidized rental housing built with green infrastructure techniques.²⁰⁸ Such an incentive would both create environmental improvements and maintain affordable rent rates. By rewarding environmentally friendly projects that offer affordable housing or community green space, municipalities express support for responsible, inclusive growth and deter large-scale luxury development.²⁰⁹

Second, city officials should extend the same environmental benefits to all neighborhoods within a municipality, perhaps especially those neighborhoods that have historically suffered environmental harm. This recommendation addresses environmental justice concerns, which city planners often ignore when making environmental policy decisions.²¹⁰ Concerns about what environmental improvements need to be made and how the city will

205. Recommendations for community engagement is discussed in more detail in Section IV.B.

206. Kali Waller, *Environmental Tax Incentives: What the United States Can Learn From the Netherlands and Japan*, 8 GOLDEN GATE U. ENVTL. L. J. 155, 163 (2015).

207. Ellen & Torrats-Espinosa, *supra* note 87, at 848.

208. *Id.*

209. See Waller, *supra* note 206, at 163, 167–68.

210. See Lazarus, *supra* note 94, at 856.

implement those improvements evade the question of how the city will distribute those improvements or, more importantly, who they may burden.²¹¹ “Only a few groups possess the substantial resources necessary for entry into those closed fora where environmental decisions are made, and the resulting distributions naturally favor these groups’ own economic interests and/or value preferences.”²¹² Thus, city officials should prioritize the appropriate distribution of environmental benefits during the planning phase and throughout implementation to ensure equal enjoyment of those benefits.

In order for environmentally hazardous neighborhoods to enjoy the same improvement benefits, municipalities must make sure that residents in those neighborhoods have a voice. This leads to the third recommendation, which is to encourage community involvement throughout planning and implementation. Specifically, city officials should make special efforts to give local residents a say in what changes the city needs to make, particularly those residents whose needs and interests have been unrepresented in the past (most often low-income, minority residents).²¹³ Additionally, community involvement may require educating residents in communities targeted for improvement. It is important to educate residents in targeted communities on the potential costs and benefits of various environmental improvements so they are aware of the potential changes to their lifestyle and access to resources. Further, this will enable residents to make informed decisions about these changes, which will allow them to better express their needs and interests in relation to the plan.

It is not enough, however, to simply provide low-income, minority residents the opportunity to represent their own interests “because correction of distributional equities is not, and should not be, the sole responsibility of racial minorit[y residents].”²¹⁴ Therefore, the final recommendation is that city officials look into the causes of racial and income disparities in order to develop effective displacement preventions.²¹⁵ Such disparities create barriers between different groups of residents within a neighborhood and can prevent some residents from taking full advantage of emerging opportunities.²¹⁶ City

211. *Id.*

212. *Id.*

213. *Id.* at 850.

214. *Id.*

215. Diaz, *supra* note 17, at 788.

216. See Ellen & Torrats-Espinosa, *supra* note 87, at 848.

officials that dominate the decision-making process “need to educate themselves about minority concerns.”²¹⁷ Local community organizations or non-profits are usually the best equipped stakeholders to identify the social and physical barriers that cause racial and income disparities.²¹⁸ These organizations and non-profits may be the strongest voices to speak for the community and ensure that everyone is able to benefit from the environmental improvements.²¹⁹ Once identified, city officials can remove these barriers through express measures incorporated into the environmental improvement plan, resulting in more effective displacement provisions. Additionally, removing these barriers could allow better access to new opportunities for low-income residents and reduce similarity preferences.²²⁰

Houston’s environmental improvement plans appear to be centered around most of the above recommendations, namely incentivization, environmental justice, and community involvement. As such, the preliminary outlines for Houston’s improvement projects suggest that Houston is on track to make huge environmental improvements without necessarily displacing its more vulnerable communities. However, big changes for such a large and ethnically diverse city mean that Houston officials and their partners should proceed with caution throughout implementation. If these changes are to be successful and inclusive, then the above recommendations should be at the core of each project and assessed throughout implementation.

One plan in particular, the HIFGD plan, seemed solely centered around incentivization with no mention of community involvement or minority representation. Unlike the BSP and the CAP, the HIFGD fails to explicitly prioritize maintaining affordability or incorporating community engagement during the implementation phase. While the HIFGD serves as a kind of “sub-plan” to these broader plans that do prioritize community involvement, the HIFGD needs to include initiatives that ensure all neighborhoods receive the environmental improvement benefits the HIFGD plan aims to provide. Perhaps tax incentives in poorer, more vulnerable neighborhoods could be higher in wealthier, greener neighborhoods that already receive relatively greater environmental benefits. Although the HIFGD plan aims to benefit all communities by bringing about environmental gentrification and improving quality of life for all Houston residents,

217. Lazarus, *supra* note 94, at 850.

218. Ellen, *supra* note 31, at 337.

219. *See id.*

220. Diaz, *supra* note 17, at 782-84, 795.

the final draft needs to include a community engagement initiative and special provisions for administering environmental justice.

Additionally, none of the environmental improvement plans addressed in this Comment include measures for city officials to look into the causes of racial and income disparities to develop effective displacement preventions.²²¹ Although all three plans did mention partnering with non-profit and community stakeholders, no plan expressly mentioned the intent to conduct an evaluation on racial and income disparities. Such information could prove especially valuable for Houston due to its exceptionally diverse economy and ethnic makeup. Breaking down disparity barriers that perpetuate discrimination could lead to increased integration between socioeconomic and racial groups and equitable accessibility of services and housing.

V. CONCLUSION

This Comment answered four questions: (1) What are Houston's environmental improvement plans? (2) How will those plans meet the city's needs concerning its response to natural disasters, its carbon footprint, and its accommodation of its ever-growing, racially diverse population? (3) What are the possible economic and cultural consequences of implementing those plans? and (4) How can Houston officials prevent displacement and ensure positive change and inclusive growth going forward?

This Comment discussed the current trend towards green initiatives in city planning and why cities should implement environmental improvement plans. Due to climate change concerns and an increase in population, estimations show that more than 66% of the world's energy will be consumed by cities.²²² Thus, cities are adopting environmental improvement projects that transform municipal infrastructure and economy to tackle these concerns and create a healthier, more sustainable urban environment. This Comment also explored how environmental improvement plans can lead to environmental gentrification, whereby an urban community historically impeded by environmental harm is revitalized by environmental improvements. Environmental gentrification has both positive and negative impacts on a city's local economy and racial diversity; it can both increase capital and community diversity as well

221. *Id.* at 788.

222. Cottingham, *supra* note 154, at 2.

as displace minority residents and deprive low-income communities of the same environmental benefits that wealthier communities enjoy.

Houston in particular has a special interest in adopting environmental improvement policies that prioritize inclusive growth. This Comment examined the BSP, the CAP, and the HIFGD plan and walked through the intended benefits of each plan, how adequately those benefits address Houston's environmental concerns, and which neighborhoods those plans will impact. In doing so, this Comment revealed that, with the exception of the HIFGD, Houston's environmental improvement plans appear centered around revitalization as much as they are centered around inclusive growth and environmental justice. Houston's preliminary outlines for these improvement projects acknowledge Houston's unique position to make a drastic, albeit community-oriented environmental change. Going forward, Houston officials, along with its private and public sector partners, should maintain this community orientation throughout the full implementation of these improvement projects. Otherwise, one of the nation's most economically and racially diverse cities could face socioeconomic and racial homogenization, thereby perpetuating environmental injustice and losing much of what makes up the spirit of the great Space City.

In conclusion, Houston serves as a good example of how municipalities can represent the needs and interests of a large, diverse group of people. And, like Houston, if a municipality wants to add value to its communities through environmental gentrification, it must incorporate anti-displacement safeguards into its environmental improvement plans. Specifically, municipalities should offer tax incentives that make green infrastructure options more attractive to developers. Municipalities also have a responsibility to acknowledge environmental injustice by extending environmental benefits to all communities, especially those that have historically suffered the most environmental harm. Additionally, municipalities should make special efforts to get community input and create special plan initiatives that address community-specific needs and interests. Finally, municipalities should identify racial and income disparities within a community in order to develop effective anti-displacement preventions. So long as city officials bear in mind the potential drawbacks of gentrification and make efforts to mitigate displacement, using these recommendations or others similar, local environmental improvement plans can offer tremendous environmental, economic, and cultural benefits to local communities.