

Headquarters:

111 E. Court St.
Suite 2C-1
Flint, MI 48502

National Office:

1101 14th St. NW
Suite 510
Washington, DC 20005

877.542.4842
communityprogress.org

July 9, 2021

Office of the Undersecretary for Domestic Finance
Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Re: American Rescue Plan Act State and Local Fiscal Recovery Funds
Public Comment in Response to Treasury's Interim Final Rule
[Docket No. TREAS-DO-2021-0008-0002 / 31 CFR Part 35 / RIN-
1505-AC77]

Dear Madam or Sir:

The Center for Community Progress ("Community Progress") appreciates the opportunity to comment in response to the Interim Final Rule ("IFR") governing the American Rescue Plan Act ("ARPA") State and Local Fiscal Recovery Fund ("SLFRF") program promulgated by the Department of the Treasury ("Treasury").

About the Center for Community Progress

Community Progress works to foster strong, equitable communities where vacant, abandoned, and deteriorated properties are transformed into assets for neighbors and neighborhoods. A national leader in land policy and land banking, Community Progress works with communities across the country to assess and reform the policies and practices that govern the use and reuse of land.

Founded in 2010, Community Progress is the leading national, nonprofit resource for urban, suburban, and rural communities seeking to address the full cycle of property revitalization. Our organization fulfills its mission by nurturing strong leadership and supporting systemic reforms. Community Progress aims to ensure that all public, private, and community leaders have the knowledge and capacity to create and sustain change. We also work to ensure that all communities have the policies, tools, and resources they need to support the effective, equitable reuse of vacant, abandoned, and deteriorated properties.

About the National Land Bank Network

Land Banks are becoming more recognized as a vital tool in the toolbox for American communities seeking to revitalize areas challenged by systemic racism, disinvestment, and displacement pressures. Building off our legacy of land bank support, Community Progress recently formed the National Land Bank Network, the first nationwide effort to coordinate the constellation of over 250 land banks in 29 states to advance equitable

neighborhood development, strengthen public policy for resilient communities, and demonstrate innovative programs and partnerships.¹

Treasury's Interim Final Rule

Community Progress commends Treasury, not only for how quickly the department released the IFR for the ARPA SLFRF program, but also for its explicit acknowledgment of disparate impacts and outcomes in Black, Brown, and Indigenous communities and in historically disinvested neighborhoods. Recognition of the long-standing, pre-COVID-19 challenges faced by certain communities – and the futility of limiting eligible recovery activities in disproportionately impacted areas – will hopefully encourage state and local leaders to think big and be bold about using SLFRF to strengthen these neighborhoods and support these populations.²

Our organization also appreciates that Treasury's interpretation of ARPA retained and expanded upon the flexibility of the statutory language creating the SLFRF. In no instance is this more impactful than in the interpretation that fiscal recovery funds must be obligated by the statutory deadline of December 31, 2024, but may be expended through the end of 2026. This will encourage state and local leaders to consider more complex, transformational recovery programs and projects that may be unfeasible to complete in under 3 years.

We commend Treasury for repeatedly emphasizing in the IFR ARPA's statutory intent, to give grantees "flexibility to determine how best to use payments from the Fiscal Recovery Funds to meet the needs of their communities and populations."³ As a practical matter, however, because the SLFRF was designed to avoid grantees seeking and receiving approval before making expenditures, state and local governments may be more reluctant to program funds for uses that are not explicitly enumerated in the IFR. So any activities that are explicitly allowed in the IFR that actionably align with a grantee's communities' and populations' needs will be more likely to receive local support than uses not explicitly authorized. Once a revised Final Rule is adopted, local leaders will be more confident in planning how to use their SLFRF allocations.

Community Progress appreciates that Treasury remains open to feedback around explicitly eligible uses and understands the challenge of balancing flexibility with specificity for a program as broad as the ARPA SLFRF.

Community Progress Responses to Questions 1, 5, 8, and 9

The Center for Community Progress is the nation's leading organization focusing on the impact of vacancy and abandonment. Given our organization's proven expertise in addressing vacancy and abandonment in disinvested communities and our direct

support to over 300 communities across the country responding to negative economic impacts since the Great Recession, Community Progress will limit our responses to the following four specific questions in the IFR:

Question 1: *Are there other types of services or costs that Treasury should consider as eligible uses to respond to the public health impacts of COVID-19? Describe how these respond to the COVID-19 public health emergency.*

Yes, Treasury should also explicitly allow for the rehabilitation and demolition of vacant structures, greening and maintenance for vacant land, and support for land bank operations, as eligible uses to respond to the public health impacts of COVID-19, for the reasons detailed below.

Question 5: *Are there other types of services or costs that Treasury should consider as eligible uses to respond to the negative economic impacts of COVID-19? Describe how these respond to the COVID-19 public health emergency.*

Yes, Treasury should also explicitly allow for the rehabilitation and demolition of vacant structures, greening and maintenance for vacant land, and support for land bank operations, as eligible uses to respond to the negative economic impacts of COVID-19, for the reasons detailed below.

Question 8: *Are there other services or costs that Treasury should consider as eligible uses to respond to the disproportionate impacts of COVID-19 on low-income populations and communities? Describe how these respond to the COVID-19 public health emergency or its negative economic impacts, including its exacerbation of pre-existing challenges in these areas.*

Yes, Treasury should also explicitly allow for the rehabilitation and demolition of vacant structures, greening and maintenance for vacant land, and support for land bank operations, as eligible uses to respond to both the public health and negative economic impacts of COVID-19, for the reasons detailed below.

Question 9: *The Interim Final Rule includes eligible uses to support affordable housing and stronger neighborhoods in disproportionately-impacted communities. Discuss the advantages and disadvantages of explicitly including other uses to support affordable housing and stronger neighborhoods, including rehabilitation of blighted properties or demolition of abandoned or vacant properties. In what ways does, or does not, this potential use address public health or economic impacts of the pandemic? What considerations, if any, could support use of Fiscal Recovery Funds in ways that do not result in resident displacement or loss of affordable housing units?*

Because the rehabilitation and demolition of blighted, vacant properties eliminates public safety risks, builds stronger, healthier communities, and creates new opportunities for housing, businesses, or green reuses to support long-term stability and community resiliency, these activities should be explicitly eligible SLFRF uses to respond to both the public health and negative economic impacts of COVID-19.

Analysis

As a threshold matter, we understand that specific activities not explicitly enumerated in the IFR are not *ineligible per se*, particularly when those activities are implicit within the context of a broader use that Treasury has deemed presumptively eligible. For example, because the IFR explicitly authorizes the development of affordable housing in Qualified Census Tracts (“QCT”), the rule does not limit a SLFRF recipient from accomplishing this affordable housing development through the rehabilitation or demolition of existing vacant or abandoned structures, or other site preparation activities necessary for new construction.

Explicitly including rehabilitation and demolition as presumptively eligible uses makes sense in this context, if for no other reason than to encourage SLFRF recipients to include these activities in their overall QCT affordable housing plans, giving state and local officials leading the decision-making process the assurance that such uses will not be challenged. **Community Progress strongly supports adding the explicit inclusion of rehabilitation and demolition to support affordable housing and stronger neighborhoods in the Treasury guidance.**

Even outside the context of increasing the supply of affordable housing in QCTs, however, the demolition and rehabilitation of vacant, abandoned, and deteriorated residential, commercial, and industrial properties strengthens neighborhoods, mitigates negative economic impacts on disproportionately impacted populations, and improves public health and public safety.⁴ Widespread vacancy and abandonment have proven negative economic impacts on neighborhood health, including increased rates of crime,⁵ decreased property values,⁶ and higher municipal and county service costs such as police, fire, and code enforcement.⁷ “Higher property values, lower crime rates, more jobs and increased economic activity have been strongly tied to blight reduction methods such as demolition, rehabilitation, new construction, and vacant lot improvement.”⁸ Disinvested rural, suburban and urban communities across the U.S. were facing a glut of vacant and deteriorated residential, commercial, and industrial properties prior to the severe job losses and business closures caused by COVID-19.

For example, in the city of Flint, Michigan, more than 1,500 vacant, burned, and blighted homes sit waiting to be demolished. The estimated cost to remove these dangerous structures alone exceeds \$17 million.⁹ Their removal has remained a top priority by Flint residents according to community engagement efforts since 2013, but the City and its

land bank lack the funding to address the scale of this need. COVID-19's economic impacts will exacerbate communities' vacancy challenges in the years ahead.

In severely disinvested cities and neighborhoods with vacancy and market challenges akin to Flint – especially small and mid-sized cities with populations less than 50,000, additional housing or commercial property supply may run counter to the immediate needs and long-term vision for the community. In those cases, demolition of a vacant structure may serve the purpose of creating new opportunities for expanding park space and tree canopies, reducing impermeable surfaces and installing green stormwater infrastructure, developing renewable energy projects, and expanding land-based businesses. Greening vacant lots has had numerous positive impacts in communities across the country, including reduction in crime, improvements in physical and mental health, and strengthening property values.¹⁰ **Thus, supporting both the greening and maintenance of vacant lots should also be considered explicitly eligible SLFRF activities.**

In the IFR, Treasury recognizes the need for and encourages the use of SLFRF **to address disparities in public health outcomes and build healthier environments**,¹¹ including:

- “housing services to support healthy living environments and neighborhoods conducive to mental and physical wellness;” and
- “evidence-based community violence intervention programs to prevent violence and mitigate the increase of violence during the pandemic.”¹²

We support Treasury's identification of these broad, flexible categories of uses to address public health, community wellbeing, and public safety, and ask Treasury to recognize that rehabilitation of blighted structures, demolition of unsafe, vacant, and abandoned properties, and greening and maintenance of vacant lots addresses *not only* negative economic consequences of the COVID-19 health crisis, *but also* addresses public health, promotes public safety, mitigates community violence, supports healthy living environments, and strengthens neighborhoods conducive to mental and physical wellness.

Many advocates and policymakers fear that a wave of post-COVID-19 foreclosures and evictions after moratoria and forbearance periods end will precipitate a new residential vacancy crisis.¹³ In Ohio alone, stakeholders estimate at least 5,000 homes around the state have already become vacant since the start of the COVID-19 crisis, despite the ongoing foreclosure and eviction moratoria. The negative impacts of the public health and economic emergency on small businesses have already begun to manifest in commercial real estate vacancies.¹⁴ Resources to address vacancy across residential, commercial, and industrial sectors, including acquisition and rehabilitation, demolition,

greening, and vacant lot maintenance will be critical to the health and strength of communities around the country moving forward.

Thus, Center for Community Progress urges Treasury to explicitly include rehabilitation and demolition of vacant, abandoned, or deteriorated structures, and the greening and maintenance of vacant lots, as eligible uses of ARPA SLFRF allocations, *not only* in the affordable housing development context in QCTs, but as activities that address public health and public safety challenges in all communities.

Support for existing land bank operations and the establishment of new land banks should also be explicitly included as eligible spending of SLFRF dollars. Land banks are a proven tool to steward recovery and long-term community resiliency. Land banks are public entities with unique governmental powers, most often created pursuant to state-enabling legislation, that support equitable development by acquiring and managing vacant real property for the advancement of community goals, with special attention to affordable housing and public neighborhood amenities. Because of their direct relationships to municipal, county, and state governments, land banks are key partners in leveraging public funds to strengthen communities. Land banks also have a proven track record of rapid, effective use of Federal and State funds to serve community priorities, meet public health, public safety, and economic needs, and support equitable, inclusive neighborhood improvement, including the Neighborhood Stabilization Program and the Hardest Hit Fund.

States like New York, Ohio, Michigan, and Georgia have demonstrated the effectiveness of land banking at multiple levels. For example:

- The New York Attorney General (“NYAG”) reported in 2016 that \$30+ million invested in the state’s land banks has yielded the reclamation of 1,995 properties from abandonment, 701 properties returned to the market and back in productive use, and 409 unstable structures demolished.¹⁵ The NYAG has since funded a \$9M follow-up program to address vacant and abandoned properties and increase neighborhood health, decrease crime, and promote stable communities.¹⁶ As a result of state enabling legislation, there are now 26 land banks across the state working to proactively intervene in and transform abandoned properties to productive use, improving quality of life for surrounding residents.¹⁷
- Ohio has produced model legislation that provides tax recapture to finance land banking activities, a codified acknowledgement of the broad impact land banks have on stewarding land and property for equitable outcomes, especially around health and economic value. The Cuyahoga Land Bank, for example, reported in 2019 that ten years of work under this state system allowed it to complete 6,939 residential demolitions and 2,122 residential rehabilitations, yielding a \$735.9 million dollar

increase in nearby home value.¹⁸ 60 land banks are currently in operation throughout the state.

- In Michigan, 46 land banks representing rural, suburban, and urban communities currently exist. They have played a critical role in building community resiliency through the rehabilitation of homes and commercial structures to further community goals like affordable housing and removing dangerous structures to put value back into the homes of existing residents. For example, the Kalamazoo County Land Bank alone had an economic impact of more than \$35 million and created more than 200 full-time jobs through the demolition of 276 dangerous structures and 102 rehabilitated homes.¹⁹ Michigan land banks have also developed green stormwater infrastructure to mitigate devastating flood events, provided land for local food production, and established community-driven land stewardship programs. The Genesee County Land Bank's vacant land stewardship program led to a 40% reduction in violent crime through maintenance of thousands of vacant lots each year.²⁰
- Georgia passed statewide land banking legislation in 2012 and currently has 23 land banks in operation. Land Banks such as the Metro Atlanta Land Bank are key partners in ensuring affordable housing goals and preventing displacement for especially communities of color who have been disproportionately impacted in the labor market by COVID.²¹

We uplift these compelling examples of the efficacy of land banks to illustrate the potential for these community development entities to accelerate post-COVID recovery and long-term resiliency for people and places together. While we understand that support for land banks may be implicit in the IFR, *explicitly* including support for land banks as eligible SLFRF expenditures will encourage local leaders to include land banks in their recovery plans to address disparate health and economic impacts of the pandemic, especially in the context of many neighborhoods subjected to historical patterns of redlining, disinvestment, and other symptoms of racial segregation and discrimination. **Community Progress therefore urges Treasury to explicitly include support for land banks and land banking activities as eligible uses of ARPA SLFRF allocations in further guidance.**

Conclusion

Community Progress appreciates the opportunity to share our expertise around vacancy, abandonment, and disinvestment with Treasury and its consideration of the above recommendations. We greatly respect and support the emphasis Treasury has placed on strengthening neighborhoods, furthering racial equity, serving disproportionately impacted populations, and encouraging SLFRF recipients to develop transformational solutions to systemic problems caused or made worse by the COVID-19 crisis. Addressing vacancy and abandonment through demolition, rehabilitation,

greening, vacant lot maintenance, and land banking will be valuable investments of these critical resources.

Please let us know if you have any questions, or if we can be of further assistance.

Sincerely,

Akilah Watkins

Dr. Akilah Watkins
President and CEO
Center for Community Progress

¹ Please visit our Land Bank Information Headquarters and interactive land bank map for more information:

<https://www.communityprogress.net/land-bank-headquarters-pages-446.php>

² Lewinski, Danielle. April 29, 2021. "An Unprecedented Opportunity for COVID Relief and Equitable Neighborhood Transformation." Center for Community Progress Blog.

<https://www.communityprogress.net/blog/unprecedented-opportunity-covid-relief-neighborhood-transformation>

³ IFR, 86 Fed. Reg. 26,788 (May 17, 2021).

⁴ Dynamo Metrics and Cuyahoga Land Bank. 2019. "Cuyahoga Land Bank: 10-year Economic Impact Analysis." <http://cuyahogalandbank.org/documents/CuyahogaImpactReport20190626.pdf>

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⁸ Dynamo Metrics and Cuyahoga Land Bank. 2019. "Cuyahoga Land Bank: 10-year Economic Impact Analysis." <http://cuyahogalandbank.org/documents/CuyahogaImpactReport20190626.pdf>

⁹ Genesee County Land Bank, May 2021.

¹⁰ Bushman, G., Gong, C., Hohl, B.C., Kondo, M.C., Rupp, L.A., Zimmerman, M.A. Forthcoming in 2021. "Associations between Land Bank Stewardship of Vacant Lots and Crime, Violence, and Youth Victimization in Flint, Michigan."

Findings: Both land bank-ownership and community-engaged mowing/maintenance of vacant parcels were associated with declines in the densities of all part I crimes, part I violent crimes, and youth victimization related to part I violent crimes, over time. We also found that land bank-maintenance of vacant parcels was associated with declines in part I violent crimes involving guns and youth victimization related to part I violent crimes involving guns, over time.

Conclusions: Land bank stewardship of vacant parcels may be protective against crime, violence, and youth victimization in legacy cities like Flint, which are dealing with both high rates of violent crime, and high rates of property vacancy.

See also:

Garvin, Eugenia, Charles Branas, Shimrit Keddem, Jeffrey Sellman, and Carolyn Cannuscio. 2012. "More Than Just an Eyesore: Local Insights And Solutions on Vacant Land And Urban Health," Journal of Urban Health: Bulletin of the New York Academy of Medicine, Vol. 90, No. 3 (2012), 418.
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¹¹ IFR, *ibid.* at 26,791, also stating: "Given the exacerbation of health disparities during the pandemic and the role of pre-existing social vulnerabilities in driving these disparate outcomes, services to address health disparities are presumed to be responsive to the public health impacts of the pandemic. Specifically, recipients may use payments from the Fiscal Recovery Funds **to facilitate access to resources that improve health outcomes, including services that** connect residents with health care resources and public assistance programs and **build healthier environments.**" (Emphasis added.)

¹² *Id.*

- ¹³ Lewinski, Danielle. April 29, 2021. "An Unprecedented Opportunity for COVID Relief and Equitable Neighborhood Transformation." Center for Community Progress Blog. <https://www.communityprogress.net/blog/unprecedented-opportunity-covid-relief-neighborhood-transformation>
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