



City Councilwoman Deb Gross
City-County Building
414 Grant St, 5th Floor
Pittsburgh, PA 15219

February 18, 2014

Dear Councilwoman Gross:

I hope this message finds you well.

As noted in my prior email to your office: *the Hill CDC's mission is to work in partnership with residents and stakeholders to create, promote, and implement strategies and programs that connect plans, policies and people to drive compelling community development opportunities in the Greater Hill District.* The Hill CDC's chief responsibility and role in the Hill District is to facilitate the implementation of real estate development, land use and economic development programs as spelled out in the Greater Hill District Master Plan.

While the Hill CDC believes that a land bank can produce many positive outcomes, the *Pittsburgh Land Bank Authority* bill as proposed does not fully consider the impacts on the Hill District and could have many negative results. To this end, the Hill CDC has compiled a list of concerns on behalf of Hill District stakeholders and other concerned community members.

I am available to discuss these concerns after your review. I am hopeful that any land bank bill adopted by the City fully protects the interests of all Pittsburgh neighborhoods, and I look forward to working with you and City Council to assure such results.

Sincerely yours,

Marimba Milliones
President & CEO

Concerns with proposed *Pittsburgh Land Bank Authority* as of 2/4/14

- The process used to create the bill did not include input from the communities with the most blighted, abandoned and tax-delinquent properties in the City of Pittsburgh such as Northside, Hill District, Uptown, Beltzhoover, Homewood, etc.
- As the bill stands, disposal of property does not require public input or community support. There is not sufficient support of CDCs and community groups to assure that neighborhood interests are protected.
- The Land Bank is not required to release land under the requirement of "Redevelopment Law" such as the URA. Therefore, there is no requirement to assure adequate public comment and accountability of future development before land is sold.
- Community organizations could be completely cut out of the development process. Under the current system, CDCs can acquire vacant properties for a nominal amount of money and partner with private developers, which gives CDCs the ability to protect the interests of their residents. This bill would eliminate that safeguard, and allow developers to acquire vacant properties without community support. Community-based organizations that are accountable to their residents should have a right-of-first refusal to acquire vacant, tax-delinquent properties in their neighborhoods. A letter of support from CDCs who serve the interests of neighborhoods should be required in order for property in the Land Bank to be sold to private developers.
- The Bill does not require any Board approval on transactions under \$50,000; Land Bank Authority staff can make such decisions. In neighborhoods suffering from depressed property values, most parcels would fall into this category. This simply places too much power and control over our neighborhoods in the hands of people with no public accountability.
- City Council members would have little influence over the use of land in their districts which is problematic since they are freely elected by the people to represent the interests of their communities.
- The bill mentions that it will follow community plans, but the City does not have funding or a formal approval process for community plans.
- The proposed board of directors should be expanded to include more than 2 community representatives, and all community representatives should live or work in a neighborhood with high numbers of vacant and tax-delinquent properties, and have experience working on neighborhood improvement initiatives such as land development.

- The bill must assure that the Board of Directors will be racially diverse and that predominantly African-American communities have sufficient representation on any interim and long-term Board.
- The bill does not encourage shared-prosperity models by which private developers are encouraged or required to partner with CDCs and community groups. This removes wealth from communities, and does not empower residents to participate in the redevelopment of their own community.
- The bill does not require that the properties in the Land Bank be maintained by businesses from the neighborhoods where the properties are located. This would help build small businesses and or community institutions and provide job opportunities for local residents.
- All Board members are appointed by political entities; either the Mayor or City Council by majority vote. This could result in the Land Bank Authority becoming overly political, and may undermine its intent of making land disposition less bureaucratic and more transparent.
- Advisory committees to the Board must include a community-level development review panel to assure alignment with the community's goals.
- There's nothing in the ordinance that would prevent private speculators from buying up vacant properties in the City's most vulnerable neighborhoods and sitting on them.
- There are not sufficient protections for owner-occupied and renter-occupied properties that are or become 2 years tax delinquent. Provisions should first seek to increase homeownership and or prevent displacement of existing residents.
- There are no meaningful safeguards to ensure that property dispositions will be consistent with community goals. The bill says that "all proposed uses of land or buildings on real estate disposed of by the Land Bank shall be consistent with the provisions of the City's Comprehensive Plan and any adopted neighborhood plans in the area in which Real Property is located." But the City has never adopted a neighborhood plan and there is currently no process by which community plans can be formally adopted. Instead of requiring consistency with something that doesn't exist, the ordinance should require actual community support and public hearings in the neighborhood.
- The proposed legislation gives an Interim Board the power to make nearly all decisions relative to the Land Bank's policies and procedures. This is not an acceptable process, as the development of policies and procedures should be done in a more transparent manner that provides for community input, and City Council approval.