

# ZONING **PRACTICE** JUNE 2010



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## **PRACTICE** NEIGHBORHOOD STABILIZATION

A photograph of a city garden with various plants and vegetables, with a large brick building in the background. The image is overlaid with a large black number 6.

# 6

# Meeting the Vacant Property Challenge

By David Morley, AICP

The ongoing foreclosure crisis and subsequent recession have led to the proliferation of vacant properties, both in perpetual hard-luck cities such as Detroit and in boomtowns such as San Diego.

Local code enforcement officials are struggling to keep pace with inspections and nuisance abatement actions. Without a comprehensive strategy for stabilizing and revitalizing vacant properties, many communities are looking at a struggle to contain blight and encourage reinvestment that could last years, if not decades.

This article briefly examines the key components of successful comprehensive vacant property revitalization efforts and highlights specific regulatory and programmatic strategies that local governments can use to improve code enforcement efforts and facilitate the recycling of vacant properties. For the sake of simplicity, it does not discuss strategies for brownfields redevelopment; however, it is important to keep in mind that contaminated sites often require additional programs and incentives to facilitate reuse.

## DEFINING VACANT PROPERTIES

The National Vacant Properties Campaign defines vacant properties as unoccupied residential, commercial, and industrial buildings and lots that meet one or both of the following conditions: The site is a public nuisance, or the owners have failed to meet the financial requirements of ownership. This definition includes properties that are tax-delinquent and foreclosed as well as abandoned structures and unused lots that pose a threat to public safety.

This definition is not the same as that used by the U.S. Census Bureau to count vacant housing units. The Census tally includes new units under construction but not yet occupied. It excludes derelict and dilapidated structures that are not habitable in their current state.

## THE PROLIFERATION OF VACANT PROPERTIES

When the housing bubble burst in 2008, the subsequent recession caused a wave

of vacant properties both in Rust Belt communities already familiar with neighborhood decline and in former Sun Belt boomtowns. Unfortunately, despite some recent positive economic indicators, there is evidence that the U.S. foreclosure crisis is not over.

Cities such as Detroit, Cleveland, and Buffalo have been struggling with thousands

ties, local governmental budgets are closely tied to new building and housing permits. This makes the challenge of preventing blight through traditional code enforcement actions all the more difficult.

While recent federal actions have probably mitigated some of the effects of the housing crisis, there is still much room for pessimism. According to U.S. Census data, the average selling price for an American home in 2009 was at a six-year low. The decline in home equity has left many borrowers “underwater,” meaning they owe more than their houses are worth. To make matters worse, many adjustable rate mortgages are scheduled to reset in 2010 or 2011. Tighter credit markets mean that prospective buyers will have a harder time obtaining loans to purchase some of the overbuilt housing, and



Genesee County Land Bank

➡ (Above) Abandoned and unsecured structures can attract illegal activities and pose serious risks to public safety. (Below) In 2008, the City of Chicago adopted a beefed-up vacant property registration ordinance that has led to almost 8,000 new registrations since its passage. The city has recently stepped up code enforcement actions, including board-ups and demolitions, in response to the ongoing foreclosure crisis.

of vacant properties for decades. The economic distress of many Rust Belt communities made them ripe targets for predatory loans and subprime mortgages. Because of weak housing demand in these cities, foreclosed homes are often abandoned altogether or purchased and then neglected by speculators looking to flip property. The consequence is that many neighborhoods that have been on the decline for years have finally reached a tipping point.

In contrast, Sun Belt cities such as San Diego, Las Vegas, and Orlando and their suburbs are facing a surge of newly built or partially built homes with no immediate prospective buyers. In many of these communi-



David Morley

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### About the Author

David Morley, AICP, is APA’s Planning Advisory Service (PAS) coordinator and is coeditor of *Zoning Practice*. Since joining APA in 2007 he has authored articles about community-based brownfield redevelopment, the use of 3-D models in development review, and complete streets.

owners with unfavorable loans may have difficulty refinancing to avoid foreclosure.

### THE COMMUNITY EFFECTS OF VACANT PROPERTIES

Abandoned buildings and vacant properties attract illegal activity and threaten public safety. Because derelict structures and overgrown lots appeal both to children looking for adventure and to drug dealers and transients looking for cover, the community risks are particularly acute.

Property abandonment causes different problems based on the type and condition of the property. A poorly secured vacant home may become a drug house, while an abandoned industrial site may become an illegal dumping ground for construction debris or other more harmful waste.

Beyond the health and public safety risks, vacant properties put a huge strain on municipal budgets. Vacant properties represent lost tax revenue and higher service costs. According to a 2005 study prepared for the Homeownership Preservation Foundation by Harvard researcher William Apgar, local governments in the Chicago area spend between \$5,000 and \$34,000 to secure and maintain a single vacant property.

Vacant properties drag down the values of nearby properties and can destabilize entire neighborhoods. The National Vacant Properties Campaign estimates that homes in close proximity to vacant structures may lose more than \$7,500 in value. Also, home owners near abandoned structures may pay higher insurance premiums due to an increased risk of property damage. Lower tax revenues mean that many distressed neighborhoods have poorer schools and reduced city services.

Proponents of the “broken-window theory” contend that disorder, crime, and blight are closely linked to the physical condition of

communities. Abandoned buildings often seem to spread like a disease through a neighborhood as local governments and property owners feel helpless to keep up with maintenance and developers and lenders become less likely to invest in troubled areas. When communities lack the resources or the will to attend to neglected properties, it sends a negative message to those in and outside of the blighted area.

### A SUCCESSFUL STRATEGY FOR STABILIZING AND REVITALIZING VACANT PROPERTIES

The long-term challenge for planners and public officials dealing with surplus vacant

at gaining control of abandoned properties, and those promoting the reuse of abandoned properties.

Despite minor differences in emphasis, most policy advocates seem to agree that the most promising tools to deal with the current explosion of vacant properties are better property information systems, improved code enforcement tools, and new acquisition authorities such as land banks.

### PROPERTY INFORMATION SYSTEMS

An effective real property information system allows a local government to identify

## The long-term challenge for planners and public officials dealing with surplus vacant properties is developing comprehensive stabilization and reclamation plans.

properties is developing comprehensive stabilization and reclamation plans for stemming the tide of disinvestment and returning vacant land to productive use. According to the National Vacant Properties Campaign, successful reclamation planning efforts consist of three core components:

1. a vacant properties monitoring system,
2. a comprehensive approach to code enforcement, and
3. a mechanism to facilitate property acquisition and reuse.

The U.S. Conference of Mayors has a slightly different take on the critical elements of an effective abandoned property strategy. It divides interventions among policies aimed at preventing abandonment, those aimed

and track vacant and distressed properties. These systems can be conceptualized in several different ways, but it may be helpful to concentrate on two distinct sets of data: (1) information about current vacant properties and (2) information about properties with a high risk of becoming vacant in the future.

Systems that focus on the first set of data are often referred to as abandoned building registries. These lists of vacant and problematic properties help communities identify responsible parties, track complaints and code violations, and help connect potential buyers to redevelopment opportunities.

Systems that also include information about distressed—but not yet vacant or abandoned—properties can be thought of



as an early warning system. Early warning systems can help local governments target code enforcement and reinvestment resources strategically to prevent blight from spreading through neighborhoods.

Despite widespread support for the idea of better real property information systems, relatively few communities have been able to overcome the institutional and financial barriers to creating such a comprehensive tracking system. Much of the necessary information is available in databases maintained by various separate public and private entities. The most successful efforts to date are often partnerships between local governments and nearby universities.

#### **Neighborhood Information System, Philadelphia**

Philadelphia's Neighborhood Information System (<http://cml.upenn.edu/NIS>) was created through a partnership between the city and the University of Pennsylvania. This system tracks purchase date, purchase price, tax delinquency status, city code violations, and utility terminations for properties across the city. The data can be viewed at the parcel level or aggregated over entire areas such as census tracts or neighborhoods. It is available to city staff, community development corporations, and other community-based organizations that frequently partner with the city.

#### **NEO CANDO, Cleveland**

Similarly, Case Western Reserve University in Cleveland operates a publicly accessible real property information system that compiles data on the city of Cleveland and the 17-county Northeast Ohio region (<http://neocando.case.edu/cando>). The system, known as NEO CANDO (Northeast Ohio Community and Neighborhood Data for Organizing) contains mortgage lending data, crime data, property characteristics, and sales information in addition to other indicators of public health and welfare.

#### **CODE ENFORCEMENT TOOLS AND STRATEGIES**

Traditional code enforcement efforts to mitigate the effects of vacant properties have long relied on two distinct, but related, regulatory tools: (1) property maintenance codes and (2) nuisance property ordinances. In recent years, overwhelmed building and zoning officials have been turning to vacant property registration ordinances as a new tool to identify and

hold owners accountable for maintaining or securing abandoned properties.

#### **PROPERTY MAINTENANCE AND NUISANCE ABATEMENT REGULATIONS**

Many local governments across the country have adopted property maintenance requirements that address both potential future structural problems (e.g., cracked foundations and leaky roofs) as well as purely aesthetic concerns (e.g., chipped paint, cracked



➡ The City of Philadelphia has contracted the Pennsylvania Horticultural Society's Philadelphia Green program to clean and green vacant lots across the city. To date, more than seven million square feet of vacant land has been stabilized by the program.

windows, or broken decorative architectural features). Some maintenance codes also establish standards for landscaping and other features of site design in addition to standards for building exteriors.

During the recent downturn, many communities adopted new property maintenance codes to guard against further property value drops, increased crime, and perceptions of blight. Additionally, many national organizations have proposed model ordinances and standards for property maintenance. Of these, the International Property Maintenance Code is the most influential and has been adopted by reference in communities both small and large.

As an alternative or supplement to property maintenance codes, many communities also depend on the older tradition of nuisance law to authorize corrective actions to bring nuisance properties into compliance. The key to effective administrative nuisance ordinances is a set of clear stan-

dards outlining what constitutes a nuisance and clear guidance on when the local government can act to abate a nuisance.

#### **Diamond Bar, California**

In eastern Los Angeles County, the City of Diamond Bar has a property maintenance code that includes standards for structure maintenance, exterior storage, and landscaping for residential, commercial, and industrial properties. It also contains nuisance abatement provisions that outline a procedure for placing a lien on properties to compensate for the costs of inspections and remedies (City Code Chapter 22.34).

#### **Gwinnett County, Georgia**

In 2007, Gwinnett County revised its property maintenance code to include specific standards for vacant buildings. These



standards require owners to keep doors, windows, and fences in working condition and prevent the accumulation of any waste materials that may attract vermin or pose a fire hazard (Code of Ordinances Section 14-328). The county's recent emphasis on code enforcement includes Operation Broken Windows, a joint police-code enforcement task force charged with protecting quality of life.

#### **Grand Rapids, Michigan**

Michigan's second-largest city recently added a new set of standards and remedies

for property maintenance nuisances. These standards include requirements for boarding structures and an authorization to place a lien against noncompliant properties to recoup the costs of abatement (City Code Title IX, Chapter 151, Article 8).

### LIMITATIONS OF TRADITIONAL CODE ENFORCEMENT

Traditional code enforcement strategies rely on identifying responsible parties. Property maintenance and nuisance abatement requirements assume the existence of a physical owner or, at least, an easily identifiable institutional owner such as a community bank. However, one of the key contributing factors to the ongoing foreclosure crisis was the creation of exotic mortgage derivatives that divided interest among a wide range of investors and institutions that have no incentive to maintain properties.

While many local governments are authorized to obtain administrative abatement orders to bring vacant properties into compliance, the upfront costs of these actions can in themselves be a disincentive for action. Even when the city is reasonably sure it could recover the costs through a property lien, it may not have the staff time or money to remedy code violations.

The truth is that many communities in the Rust Belt and in the Sun Belt are simply overwhelmed by the sheer number of vacant properties. They do not have the budgets for proactive inspections or reactive abatement.

### VACANT PROPERTY REGISTRATION ORDINANCES

Beyond traditional code enforcement regulations and actions, a growing number of communities have adopted vacant property registration ordinances in response to concerns about the negative effects of vacant and foreclosed homes. According to Safeguard Properties—a company hired by many mortgage servicers to act as property manager for foreclosed properties—more than 350 local governments either have registration ordinances or are currently considering registration requirements.

Vacant property registration (VPR) ordinances require owners to notify the local government when a property becomes vacant. Most ordinances also require owners to pay a registration fee to defray the costs of providing municipal services. Additional provisions may include property maintenance standards, a proof of insurance requirement, and a requirement to submit a plan to return vacant properties to productive use.

The reasoning behind these regulations is that the registration fee creates an added incentive for code compliance. For communities interested in creating a real property information system, VPR ordinances can simplify the process of gathering information about current vacant properties. Unsurprisingly, the mortgage service industry has not shown support for this rapid proliferation of VPR ordinances.

### VPR ORDINANCE MODELS AND PROVISIONS

There are two basic types of VPR ordinances: (1) those that regulate all vacant and abandoned properties regardless of ownership structure and (2) those that target properties in foreclosure. Despite differences in applicability, many of the common provisions discussed below appear in examples of both.



➡ Through a partnership with the City of Flint, Michigan, the Genesee County Land Bank has cleaned and demolished over 950 derelict structures that were posing a threat to public safety.

### Definitions and Applicability

Perhaps the most important sections of a VPR ordinance are the list of definitions and the statement of applicability. This is where the community defines the terms “vacant” or “abandoned” and clarifies which types of properties must comply with the provisions of the ordinance. The length of time that a property remains unoccupied is usually the trigger for type 1 ordinances, while the trigger for type 2 ordinances is usually the foreclosure process.

Type 1 ordinances must use a length of vacancy that is long enough to exclude seasonal properties and short-term rentals but not so long that the properties become run-down and dangerous before the requirements are triggered. Most communities have a minimum threshold of six months.

### Registration Process

Once a property qualifies as being vacant or in foreclosure, VPR ordinances typically require owners to register the property within a certain number of days and to pay a fee to cover inspection and service costs. The time frame for registration varies considerably from place to place and may be as short as 10 days or as long as one year. Similarly, registration fees range from a nominal \$70 all the way up to a hefty price of \$6,000 per property.

In most ordinances, these fees are due periodically and may increase from period to period. Graduated fees create a disincentive for speculators waiting for the market to return and help offset the costs of code enforcement as properties sit vacant for long periods of time. Some communities also include an option to waive the fees

without waiving other requirements. This can be used to accommodate community development corporations, land banks, or other entities working with local governments to facilitate the reuse of vacant properties.

Chula Vista, California, has become the poster child of the most recent round of VPR ordinance adoptions. The city’s regulations include a number of innovative provisions including a requirement that mortgage companies must inspect and maintain properties on a weekly basis to ensure they remain in compliance with neighborhood standards. The city also permits owners to register using either the standard city-issued form or through an approved national database as long as the city can access the ser-

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U.S. Department of Housing and Urban Development. 2009. *Revitalizing Foreclosed Properties with Land Banks*. [www.huduser.org](http://www.huduser.org).

vice at no charge (Municipal Code Section 15.60.040).

### Posting Requirements

Many VPR ordinances require owners to post contact information or warning signs on site. The contact information ensures that emergency responders can notify responsible parties in case of fire or criminal activity, and a warning sign can provide the basis for prosecution of trespassers.

### Maintenance and Reuse Plans

A number of VPR ordinances compel owners to submit a plan detailing how they will bring properties into code compliance and return them to productive use. For example, the Village of Alsip, Illinois, requires that owners submit a vacant building plan at the time of registration. This plan must document the steps the owner will take to bring the property up to code and state a target date when the property will either be demolished or ready for reuse (Code of Ordinances Section 6-609).

### Enforcement

Enforcement provisions ensure that owners take the registration requirement seriously. Failure to register often results in a monthly late fee, and some ordinances stipulate that the local government can place a lien on delinquent properties or even pursue criminal prosecution.

One of the oldest examples of a type 1 VPR ordinance is from Wilmington, Delaware. Wilmington's code includes a lien provision as the primary enforcement mechanism (Code of Ordinances Chapter 4, Section 4-27-125).

### MORTGAGE INDUSTRY RESISTANCE TO VPR ORDINANCES

Critics of VPR ordinances within the mortgage service industry question the legality of requiring servicers and their representatives to maintain vacant properties before the title is conveyed to the lender. However, as the Vacant Properties Campaign's Joseph Schilling points out, state property laws uphold the basic precepts that local laws should encourage productive use and discourage destruction while simultaneously insulating nearby property owners from spillover effects of negligent or harmful property use.

Recently, the Mortgage Bankers Association and Safeguard have convened a Vacant Property Registration Committee to track new ordinances and to formulate strategies for coping with the complex patchwork of local requirements. Schilling warns that the mortgage industry may eventually lobby

for state legislation that would preempt local registration regulations.

### ACQUIRING AND RECYCLING VACANT PROPERTIES

Property information systems, maintenance codes, and registration ordinances can all help code enforcement efforts to stabilize neighborhoods facing a rash of foreclosures. However, the effects of widespread vacancies can be overwhelming for local code enforcement officials. Most planners and policy advocates familiar with the issues surrounding the recent proliferation of vacant properties agree that long-term revitalization is dependent on policies that expedite the acquisition and reuse of abandoned and tax-delinquent properties.

Local governments acquire vacant properties through a range of mechanisms including tax foreclosure, eminent domain, and gift property programs. However, managing these processes and programs is a complex, and at times, contentious task. For example, tax foreclosures can face lengthy delays due to mandatory waiting periods, noticing requirements, claims of third-party buyers, and conflicts between city and county governments. Meanwhile, the use of eminent domain has become increasingly controversial in the years since the U.S. Supreme Court decision in *Kelo v. City of New London* (545 U.S. 469 (2005)).

In response to the challenges of managing an acquisition strategy, a number of communities have formed partnerships with community development corporations or created new redevelopment authorities to focus exclusively on recycling vacant properties. Most of the recent attention in this area has focused on the use of land banks as vacant property strategy managers.

### LAND BANKS

Land banks are local governmental or nonprofit entities that acquire, maintain, and facilitate the redevelopment of vacant properties. These organizations are enabled at the state level and created through local ordinances. Funding typically comes either from local government budgets or from revenue generated through operations.

Although land banks historically have functioned to acquire tax-foreclosed properties, the Neighborhood Stabilization Program authorized by the Housing and Economic Recovery Act of 2008 provided funding to state and local governments that have been hit hardest by the foreclosure crisis.



# The Neighborhood Stabilization Program and the subsequent American Recovery and Reinvestment Act of 2009 opened new doors for land banks to acquire foreclosed and abandoned properties.

This program and the subsequent American Recovery and Reinvestment Act of 2009 opened new doors for land banks to acquire foreclosed and abandoned properties in addition to those with tax liens.

Currently, only a handful of states have adopted enabling legislation for land banks. Michigan's law is generally considered one of the most effective. In addition to authorizing land banks to eliminate back taxes, clear titles, and set below-market sale prices, the Land Bank Fast Track Act permits land banks to use tax-increment financing to promote redevelopment (Public Act 258).

In its eight-year history, GCLBA has held more than 4,000 properties in its inventory. It renovates between 25 and 50 houses each year. Funding for operations comes from back taxes, taxes generated from redevelopment, and revenue from rental and sales programs. Additionally, GCLBA uses tax-increment financing to clean and demolish properties.

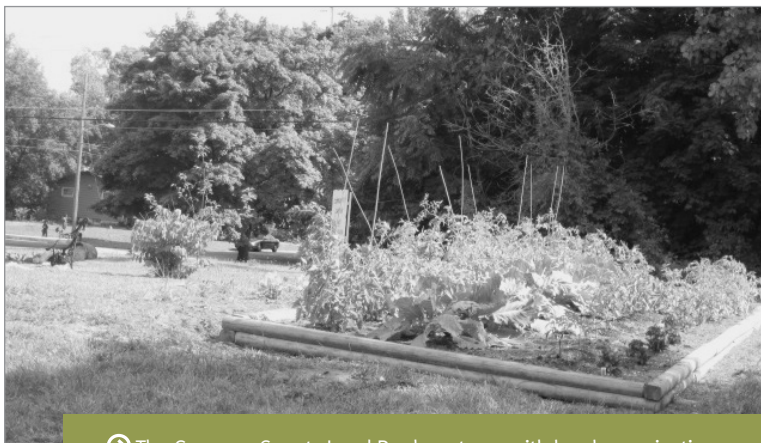
## CONCLUSIONS

Real property information systems, aggressive code enforcement, and mechanisms to facilitate the acquisition and reuse of vacant

population loss have finally led to serious discussions about right-sizing infrastructure and concentrating resources where they will do the most good. Vacant land policies in these cities may stress open space creation and urban agriculture over traditional bricks-and-mortar development.

Meanwhile, Sun Belt communities face a different challenge. Since World War II, many of these places have been subject to periodic boom-and-bust cycles tied to the housing market. As the economy recovers, population growth will likely resume. The challenge for these communities is to find ways to target investments and growth more strategically to take advantage of existing infrastructure and to meet the increasing demand for better public transportation, urban amenities, and more sustainable housing, employment, and recreation options.

Community gardens have become a popular strategy for managing surplus vacant land. The image on the cover depicts the Temple Garden in Washington, D.C. This community garden was established in 1990 on land owned by the Scottish Right Masonic Temple. Photo courtesy of John Reinhardt, AICP. Design concept by Lisa Barton.



➡ The Genesee County Land Bank partners with local organizations to clean and green vacant lots in Flint, Michigan. The land bank encourages all Clean and Green program participants to incorporate vegetable gardens and to involve area youth in their efforts.

## Genesee County Land Bank Authority, Flint, Michigan

Since its creation in 2002, the Genesee County Land Bank Authority (GCLBA) has become a model for land banks across the country. GCLBA operates 10 programs that guard against foreclosures and facilitate the reuse of vacant properties. These programs include foreclosure postponement, property maintenance, side-lot and adopt-a-lot options, brown-fields redevelopment, and physical planning.

properties are all important components of a local strategy for stabilization and reinvestment. However, as with all planning interventions, responses should be context-sensitive. While the latest wave of foreclosures has created a common cause among disparate communities, the path forward may look very different in the Rust Belt than it does in the Sun Belt.

In cities such as Detroit, Cleveland, and Buffalo, decades of disinvestment and

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DOES YOUR COMMUNITY HAVE  
A COMPREHENSIVE VACANT  
PROPERTY STRATEGY?

6