

The “Zombie” and Vacant Properties Remediation and Prevention Initiative: Emerging Best Practices

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I. INTRODUCTION

In 2016, the convergence of new legal authority and funds from a significant bank settlement gave municipalities in New York State an unprecedented opportunity to take stock of and address zombie and vacant properties in their jurisdictions. With grant funds and technical expertise from the “Zombie” and Vacant Properties Remediation and Prevention Initiative, 76 cities, towns and villages across the state began grappling with properties that were stuck in the foreclosure process or otherwise vacant. This paper provides a brief overview of the Initiative, including its history, challenges, and emerging best practices. The paper ends with suggested next steps in the continued effort to address zombie and empty residential properties in New York State.

II. BACKGROUND

New York State’s Mortgage Foreclosure Crisis

At its peak in 2010, the housing crisis resulted in foreclosure filings against 2.87 million properties nationwide.¹ In New York State, the foreclosure inventory reached a high of 101,000 in 2012.² The pace of foreclosures has since eased, but large and small communities throughout the state are still feeling residual effects in the form of deteriorating residential properties tied to zombie mortgages.

What makes a property a “zombie”? A “vacant” is any one-to-four-family house that is not occupied for any reason, including the owner’s abandonment or death.³ A “zombie,” however, is a special type of vacant: a structure, typically a one-to-four-family house, with a mortgage lien that is stuck in the foreclosure process. This state of being neither lien-free nor fully foreclosed-upon is referred to as a “zombie foreclosure.”

In many such cases, the resident owner vacates the house at the first notice of foreclosure proceedings, believing a bank has already assumed control of the property and saving it is a lost cause. In truth, the foreclosure process, even when actively pursued, can take several years; some foreclosures languish even longer.⁴ When owners vacate these properties, they become subject to damage from weather, scavenging, squatters and criminal activity. The resulting deterioration can render them nuisances or worse, negatively affecting neighboring property values and physical

¹ Forbes, “2014 Foreclosure Filings Hit Lowest Level Since 2006, RealtyTrac Says” by Erin Carlyle, January 15, 2015

² CoreLogic, “United States Residential Foreclosure Crisis: Ten Years Later” March 2017 p.3
<https://www.corelogic.com/research/foreclosure-report/national-foreclosure-report-10-year.pdf>

³ This is LISC’s working definition for the purpose of this Initiative

⁴ Banks cite several financial disincentives to completing foreclosures in New York State, including a long and expensive foreclosure process, costs of foreclosing on distressed collateral that exceed the monetary recovery, and the weak housing markets in some geographies that makes it difficult to sell foreclosed properties. The “Zombie Law” discussed below, has now created financial disincentives to *failing* to complete foreclosures. It is worth noting here that alternatives to indefinite foreclosure are: mortgage modifications, short sales and deeds in lieu of foreclosure, tools available for banks to work with homeowners.

conditions. But zombie foreclosures can also cloud a properties' title and make it more difficult for a municipality to enforce needed maintenance.

Although the nationwide mortgage foreclosure crisis began 10 years ago, New York State saw a large upswing in these zombie properties from 2013 to 2015:

According to the New York State Attorney General, zombie foreclosures increased almost 50% in 2014 from 2013. By 2015, sources reported New York zombie foreclosures had increased another 54%, totaling 16,777 properties.⁵

Cities, towns, and villages could do little to address these deteriorating zombies because the financial institutions had no legal responsibility for upkeep and rarely did anything to accelerate the foreclosure process. This trend exacerbated the already rising number of uninhabited houses plaguing some municipalities due to job losses and population decrease. The result was a crisis of empty properties, vacant for any number of reasons, causing significant distress to surrounding houses, blocks and neighborhoods.

III. THE CHALLENGES

Why Municipalities Struggled to Cope

Many jurisdictions, even small villages, had more than 100 vacant properties within their municipal limits and some had thousands, and most struggled to understand how best to manage the crisis. Their challenges included:

- **Insufficient data:** Many municipalities did not know the exact number and locations of vacants and the full scale of the problem. In most cases, they lacked the resources to investigate and compile a full inventory, and thus could not develop a comprehensive strategy, instead only responding to one-off complaints. While they typically knew about the worst offenders – those properties receiving the most complaints – scores of others were deteriorating without the municipalities' knowledge or intervention.
- **Under-resourced departments:** Existing local government resources were insufficient to keep up with inspections, enforcement and information gathering at the scale required. Code enforcement departments lacked the staff and technology to address the volume of vacants. Inspectors had to return to the office to manually enter inspection data gathered in the field into office systems, making inspection and enforcement time-consuming and laborious. Code enforcement staff found it a perennial challenge to stay on top of their workloads.

⁵"New York Doubling Down in Fight Against Zombie Foreclosures", *Housing Wire*, February 17, 2015

- **Lack of identifying information:** Because zombie properties were still in foreclosure, the homeowners of record remained responsible for maintenance and taxes. Many of these owners were long gone and impossible to track down. They did not receive legal notices sent via traditional mail to the homes. It was also difficult to identify lienholders without title research, which can be expensive to outsource and time-consuming for municipalities to conduct themselves. Thus, municipalities had virtually no reliable methods for compelling maintenance, collecting taxes and fines or pursuing legal remedies.
- **Fragmentation of responsibility:** Responsibility for various aspects of vacant and zombie properties is typically spread across municipal departments, including code enforcement, public safety, and the tax assessor, among others, meaning no individual or department “owns” the whole problem. Without a designated point person, municipalities lacked the ability to communicate or coordinate efforts around vacants across departments or jurisdictions.
- **Rapid property deterioration:** Rapid and ongoing physical deterioration of the uninhabited properties, especially in winter months, rendered the properties less marketable for resale, more expensive to rehabilitate and sometimes, in the worst cases, in need of emergency stabilization or demolition by the local government.
- **Continuous pipeline:** Even as localities struggled with the existing inventory of vacants, the crisis continued to grow as additional homes went into foreclosure each year. At-risk homeowners had limited awareness of foreclosure prevention resources or their rights to stay in their houses, making it difficult to stem the tide of abandonment.
- **Weak housing markets:** Weak demand and oversupply of housing stock due to declining populations in many neighborhoods, made it difficult to sell or repurpose vacants. With few resale prospects, banks had little incentive to accelerate the foreclosure process or to maintain properties sufficiently.

IV. THE INTERVENTIONS

New Legislation

New York State Attorney General (AG) Eric Schneiderman advocated for many years for legislation that would hold banks responsible for maintaining zombies. Eventually, in 2016, the New York State legislature passed the *New York State Abandoned Property Neighborhood Relief Act of 2016*, better known as the “Zombie Law.” The Zombie Law requires financial institutions to maintain physically and repair one-to-four-family houses when the bank has a lien on the property, the structures have been vacant for at least 90 days, and the properties are mortgage delinquent or somewhere in the foreclosure process. The Zombie Law gave New York cities, towns and villages a powerful tool to address the problem of zombies and vacants in their jurisdictions because, for the first time, banks

have to repair externally and maintain zombies as lienholders on the property. Existing state and local code enforcement laws have generally obligated only owners, and not lienholders, to maintain properties, so the Zombie Law was a significant change.⁶

The “Zombie Law” At a Glance

- Banks must maintain vacant, liened properties, delinquent or in the foreclosure process, free of external code violations
- Banks must register zombie properties with the New York State Department of Financial Services (DFS); the DFS registry allows the municipalities to access the names and contact information for lienholders
- Municipalities can charge banks a penalty of \$500 a day per property for lack of maintenance
- Introduces an accelerated foreclosure process for zombies

Funding Available through Bank Settlements

Also in 2016, AG Schneiderman co-led the Residential Mortgage-Backed Securities Group (“RMBS”), a joint state and federal working group, also including the U.S. Department of Justice and other state attorneys general. The RMBS negotiated additional financial settlements with banks for acts contributing to the mortgage foreclosure crisis.⁷ These settlements obliged some banks to fund housing initiatives in New York State, including code enforcement and housing quality improvement. One settlement is the source of the funds for the municipalities to address the zombie crisis, discussed in more detail below.

The combination of new funding streams from a bank settlement designated for New York State and the enactment of the Zombie Law led to the creation of a first-of-its-kind initiative to combat the issue of concentrated “zombie” and vacant properties in certain communities in a more comprehensive way.

New York State Housing Stabilization Fund

After the settlements, several banks then selected Local Initiatives Support Corporation (LISC), a national community development intermediary, to administer up to \$75 million in settlement proceeds for these housing-related initiatives across New York State. The program titled, "The New York State Housing Stabilization Fund," (the “Stabilization Fund”) distributes grants and provides

⁶ https://dfs.ny.gov/banking/zombie_prop_legislation.htm

⁷ <https://www.justice.gov/opa/pr/residential-mortgage-backed-securities-rmbs-working-group-announces-new-resources-investigate>

technical assistance to municipalities.⁸ LISC worked in close partnership with the AG's office to commit the \$75 million in funds to a range of critically necessary housing initiatives.⁹

V. "ZOMBIE" AND VACANT PROPERTIES REMEDIATION AND PRESERVATION INITIATIVE

The centerpiece of the New York State Housing Stabilization Fund's work is LISC's "*Zombie*" and *Vacant Properties Remediation and Prevention Initiative* (the "Initiative"). With so many localities of different sizes suffering from zombies and vacants, the AG was interested in reaching as many affected communities across the state as possible with the funds designated for code enforcement and housing quality improvement. Drawing on its expertise, LISC has responded, working with municipalities to build their capacity to deal with zombies and other vacant properties in several ways.

To date LISC has committed \$12.6 million to fund 76 cities, towns and villages spanning the entire state, to inventory and address their vacant homes including enforcing the Zombie Law locally. LISC is combining these LISC Grants (also called "Zombie Grants") with capacity-building initiatives. Specifically, LISC offers municipalities the following assistance:

Patient, flexible grant funding: Localities can use their LISC Grant in nearly any way they choose to focus on vacants, based on their local needs and priorities. The sole required use of LISC Grant funds is to connect at-risk homeowners to foreclosure prevention resources. Most are hiring additional staff or buying new technology, but LISC has given each site the freedom to define its problems and corresponding solutions. Recognizing the issue is large and complex and will take time to resolve, LISC is also flexible around grant terms and the timeline for results.

Technical assistance/capacity building: LISC's New York State Housing Stabilization Fund team worked intensively with municipalities to convert their applications into work plans and budgets. The LISC team provides monthly coaching, feedback and troubleshooting as the sites' work progresses. LISC also provides in-person regional trainings.

Peer support/collecting best practices: Monthly calls and webinars offer important opportunities for peer support. LISC invites municipalities to share their innovations and successes with the group so peers can hear about ideas and learn from one another, since many are facing very similar

⁸ LISC has a 38-year history of supporting revitalization efforts that span the full spectrum of community development interventions, including affordable housing, economic development, and health and safety. For more information, visit <http://www.lisc.org>.

⁹To date, LISC has committed these settlement dollars to a range of programs: for subsidies to create and preserve affordable rental housing, to capitalize land banks and provide AmeriCorps members to them, to fund initiatives for code enforcement and housing quality improvement, and to provide rehabilitation grants to transform vacants into affordable housing, among other uses. This paper covers solely the Initiative.

circumstances.¹⁰ Municipalities also contact each other directly and convene on a county-wide or regional basis, apart from the formal Initiative.

Including the equity lens: LISC has a long history of promoting equitable revitalization of communities using a house-by-house, block-by-block model in some of the most distressed communities in the country. LISC applied this lens to the Initiative as well. Through its technical assistance, LISC has helped local officials target neighborhoods that might be slower to overcome their property distress due to historic inequities, while also encouraging them to prioritize these neighborhoods appropriately. The goal is for the equity concepts they use in planning to carry over to the day-to-day work of implementing the plans as well.

VI. KEY LESSONS LEARNED

LISC began working with grantees on their vacant property strategies in late 2016. Through the early stages of the LISC Grants, some successful practices, discussed below, have emerged to help municipalities start their work.

A Municipal “Quarterback” For Vacant Properties To Lead An Integrated Approach

Hiring or designating a vacant coordinator at the municipal level is a key to larger scale success. Most cities, towns and villages have multiple departments that interface with vacants, including police and fire, code enforcement, and housing departments, among others. Without a single point of contact, departments might duplicate or counteract each other’s efforts. A coordinator keeps everyone informed about the municipality’s priorities and tracks what actions have been, or need to be, taken. Most importantly, and as discussed in more detail below, addressing a community’s zombies effectively requires coordinating multiple strategies simultaneously. A coordinator position provides the leadership needed to create and manage municipalities’ interconnected systems and strategies effectively.

One of the best examples to date has been in **Albany**, where the LISC Grant funds a "Neighborhood Stabilization Coordinator" who is responsible for convening city departments, gathering and aggregating data from each, and bringing together a county task force of public and nonprofit partners to enable the repurposing of vacants as affordable housing. **Riverhead** implemented a "legal quarterback" model, hiring an attorney paid with its LISC Grant to build relationships among different municipal departments, coordinate their efforts on vacants and incorporate legal strategies to hold banks accountable. Representatives from various departments, including public safety and code enforcement, have even teamed up to make joint site visits to problem properties to coordinate corrective action.

¹⁰ Group discussion topics have included: outreach strategies to connect at-risk homeowners with foreclosure prevention resources, legal strategies for holding banks accountable and for freeing up title, and a bank-by-bank approach to obtaining maintenance of vacants.

An Integrated Systems Approach

In addition to designating a clear leader, municipalities need to integrate and improve (and in some cases, create) municipal systems and processes to support an organizing framework that allows for the execution of a zombie and vacants strategy. We have observed some of the following common components of an integrated approach to date.

Using technology to create an inventory: Before municipalities can begin deploying resources to rehabilitate properties, they need to know how many vacant properties are in their community and where they are located. Unfortunately, most towns have significantly outdated systems and inefficient processes for capturing this information. Thus, many cities and towns used LISC Grants to purchase and deploy technology to help collect, aggregate, and disseminate vacant data across departments.

- The most common technology upgrade was purchasing tablets for code enforcement officers (some of whom were still working with pencil and paper) to use in the field. Tablets enabled them to enter real-time data into their office systems, rather than having to spend time later on data entry. **Smithtown** and tiny **Gouverneur** near the Canadian border both purchased tablets and are using mobile applications for data collection, enabling their inspectors to operate more efficiently in the field.
- Municipalities including **White Plains** are also using data analytics platforms such as BuildingBlocks© to organize and make sense of their vacant data. They are finding it allows them to see the problem – and possible strategies – in a new way. These platforms can be especially useful in allowing information sharing and aggregation between municipal departments, such as collecting code data, public safety calls and tax information in one system.

Housing surveys: Some cities and towns brought in consultants or nonprofit partners to conduct comprehensive surveys of their housing stock to supplement their internal data. **Buffalo** hired a consultant to complete a “windshield survey,” mapping every residential property in the city including all vacants and highly distressed properties. The consultant then made recommendations about where and why to invest resources. This data is now informing how and where Buffalo will target properties for enforcement, acquisition or demolition and how the city will use its affordable housing resources strategically for redevelopment.

Task forces: One of the most effective tactics has been to create task forces to prioritize vacants and tackle their issues. Interdepartmental task forces resolve the challenge of siloed departments within local governments, as task force members have a venue and a motivation to share information across the silos. Regional task forces that include city and county representatives, nonprofits and other interested parties help resolve issues across jurisdictional lines that can otherwise be hard to cross. For example, the **Rochester** Vacant Property Coordinator staffs the county-wide Monroe County Vacant and Abandoned Property Task Force, which has effectively overhauled outmoded county-wide practices to address vacants. In **Amsterdam**, the city is working with neighboring municipalities to share information about problem owners who move between jurisdictions, which helps them keep tax-auctioned properties out of the hands of bad actors.

Strategies

Using the multifaceted approach outlined above, cities, towns and villages are better equipped to tackle specific strategies to remedy their zombies and vacants. These strategies include code enforcement, legal work, foreclosure prevention and repurposing.

More effective code enforcement:

Municipalities are using their existing enforcement tools more fully with additional staff and resources the LISC Grants provide, including making repairs, increasing the frequency and thoroughness of code inspections, and bringing legal proceedings against violators. Some are using the tools more creatively with the Zombie Law providing the leverage, as discussed below.

- ***Using the Zombie Law as an additional enforcement tool:*** In **Niagara Falls**, using the vacants coordinator funded by the LISC Grant, the city began tracking the \$500 per day fines for properties on the DFS Registry that were not adequately maintained. They aggregated all fines for all addresses for which a given bank had liens and sent letters to each bank showing the entire amount they owed for Zombie Law violations. While this started as an enforcement initiative, it caught banks' attention and several banks have established productive working relationships with Niagara Falls, troubleshooting property maintenance and disposition together.
- ***Municipalities remediating physical conditions of houses:*** Municipalities are using intensified code enforcement techniques to arrest the broader physical deterioration of communities and fix violations. In **Syracuse**, the city used a portion of its LISC Grant to create a revolving fund to expand beyond "cut and clean"¹¹ to make external repairs to remedy code violations in zombies that banks are mandated to do in the Zombie Law. The cost of repairs is added to the property tax bill and collected proceeds go back into the fund to support more repairs. As a result, Syracuse is seeing more compliance from banks that recognize it is in their interest to take care of repairs themselves. The repaired properties are also attracting interest from potential buyers, creating an incentive for banks to move properties through the foreclosure process more quickly.
- ***Ramping up code enforcement capacity:*** **Fulton** used the LISC Grant to hire another code inspector and upgrade technology, allowing much greater code enforcement activity and a reduction in vacants from 90 properties to 74.

Doing the legal legwork:

One reason properties languish as zombies is that it is often unclear who is responsible for the ultimate disposal of the property, or even the next step in the process. Municipalities cannot repurpose properties until they figure out who owns or has a lien on them, and then clear the titles, typically a labor-intensive and time-consuming process. LISC Grant funding is supporting extra personnel to do the necessary research to clear titles.

¹¹ "Cut and clean" is a phrase that means cutting the grass and removing the debris from a property but not making any repairs nor correcting any code violations on the house itself.

In **Rome**, the city has negotiated a reduced fee for title searches with a local company, enabling them to perform searches for liens to find the banks responsible for maintenance and refer them to DFS to obtain compliance. In **Jamestown**, this research brought different results: a lawyer hired with the LISC Grant was able to track down owners through title research. In one case, he assisted a family in returning to their home after discovering the bank lien had been discharged. In another case that same lawyer tracked down a deceased woman's two children who were not aware they had inherited their mother's vacant house, allowing the daughter to move in.

Preventing Vacants:

- ***Keeping at-risk homeowners at home:*** Prevention of new foreclosures and resulting vacancies is as important as resolving the zombies that already exist. The LISC Grant includes a requirement that every participating locality conduct outreach to at-risk homeowners, letting them know their rights and connecting them to resources that can help them. Cities have used different strategies for reaching these parties. In **West Seneca**, the clerk sends letters to the owners for every *lis pendens* filed against a house in town, advising them to reach out to him if they are in danger of foreclosure. The city of **Hornell**, in a rural area, is providing meeting space where a non-local HUD-certified counselor can counsel at-risk homeowners, reducing travel time and costs of accessing services.
- ***Developing models for predicting future zombies for early intervention:*** **New York City's** Department of Housing Preservation and Development (HPD) has already created an innovative data model to capture information about specific indicators, such as physical and financial distress, from all the zombie houses existing in New York City. It is beginning the next phase of model development to provide a predictive tool, enabling HPD to determine when a property, not yet vacant, might become a zombie in the near term. HPD will share the houses identified through the model with other city departments in the hopes that they can intervene and prevent residents from vacating.

Repurposing Equitably:

In deciding where and how to repurpose vacant properties, looking to benefit the people and communities most adversely affected by the zombie and vacants crisis is a guiding principle. **Elmira** is working on vacants throughout the city, but focusing resources and effort intently on a particular neighborhood, the Near West Side, that was particularly hard-hit by uninhabited houses. The city is deploying its LISC Grant and other resources to identify and integrate the repurposing of vacants into its overall plan to improve distressed blocks and increase affordable housing options. In **Schenectady**, the city is repurposing its vacants to provide homeownership opportunities for first-time low- and moderate-income homebuyers.

VII. TAKING STOCK AND LOOKING AHEAD

Success for each locality will differ depending on where they started, but there are a number of common factors that demonstrate progress. For some sites that lacked the personnel and other resources required to address their vacants issue, simply compiling a comprehensive inventory constitutes major progress. Others knew the depth of the problem but were overwhelmed by the magnitude and found themselves without the right systems or personnel in place to approach it. Through the LISC Grants and accompanying technical assistance, LISC set out to equip each municipality with the tools it needed to move the needle on vacants in the way that made the most sense locally.

How are we defining success?

- Understanding the scope and scale of the problem in detail
- Elevating the issue to a higher municipal priority
- Improving systems and communication for dealing with vacants
- Prioritizing which vacants and which neighborhoods to address
- Building capacity to enforce code and hold banks and owners accountable
- Developing productive, mutually beneficial relationships with banks to move properties off vacant rolls
- Stemming the tide of new vacants by keeping at-risk homeowners at home
- Reducing vacants by restoring out-of-possession homeowners to their homes
- Repurposing properties strategically for affordable housing and other community assets

At roughly the halfway point in the grant period, many localities are still inventorying and assessing the vacants problem, but they are nevertheless already reaping the rewards of their work. A number of the municipalities have been pleasantly surprised to find that houses can be sold and repurposed, with new families moving in and contractors rehabilitating properties to sell or rent. Properties that have been vacant for many years are suddenly drawing interest as the localities or banks take care of external maintenance. In all cases, the LISC Grants have fostered new relationships within the government and communities that are facilitating collaboration to get things done.

Banks are finding it makes sense to work with municipalities rather than fighting them, and they are forming productive relationships in several cases. The Zombie Law and LISC Grants have created a synergy in which banks now have a legal incentive to come to the table, and municipalities have new resources to do the labor-intensive work of tracking them down. Coupled with increasing market interest in the cleaned-up properties, this is generating real momentum in some places, moving properties off the vacant registries and returning them to the tax rolls, to visible effect in the neighborhoods. Finally, code enforcement work is becoming less complaint-driven and more targeted and strategic. Code enforcement departments are now seeing some tangible building maintenance coming from their efforts rather than being stuck reactively writing stacks of violations that do not improve the housing stock.

It is not too early, however, to begin thinking about what comes next, which for most municipalities will be addressing the bricks-and-mortar work of rehabilitating and reoccupying homes and reinvigorating neighborhoods. Many municipalities are prioritizing the following components in the next phase of their work.

Long-range plans with phased-in steps

The challenge of zombies and vacants is too broad to allow most cities, towns and villages to tackle everything at once, even with a sound, integrated approach. Many places will only now begin thinking about how to build off of their integrated approach to engage in long-term planning for how their zombies and vacants fit into comprehensive neighborhood redevelopment strategies. This work can take months or years to complete, but the early wins are a catalyst for continuing the work in a purposeful, strategic manner until the vacants problem is solved.

Focus on repurposing properties, ideally to create affordable housing

For some structures that have been vacant for long periods, especially in harsh winter conditions, demolition is the only option. But many others, once cleared of liens, can be rehabilitated and brought back to life. As they move ahead, municipalities will focus on finding ways to repurpose the backlog of vacant properties in their communities. As municipalities and land banks acquire properties for rehab and resale, they are looking to create home ownership opportunities for first-time buyers, or scattered-site affordable rental properties where affordable, quality rental options are in short supply. Municipalities are shifting their perspectives to view the vacants as potential assets rather than liabilities and to reintegrate them into their communities as part of larger affordable housing and economic development initiatives.

Maintain prevention efforts

While managing the current inventory of vacants, localities endeavor to prevent new vacancies from occurring. This work includes continuing to connect at-risk homeowners to foreclosure prevention resources and developing models to predict future vacancy and intervene to prevent it. It also involves efforts like creating and funding affordable home repair programs to help keep properties from deteriorating to the point where they are uninhabitable or to prevent a backlog of code enforcement fines charged to taxes that results in homes being lost to property tax foreclosure.

Examine and change local policies and laws

Municipalities are also actively pursuing local legislative, regulatory and policy changes that will help prevent vacancies, beef up code enforcement, and promote more effective stewardship and repurposing. Towns, cities and villages will be reviewing their policies and laws to determine whether they are undermining their efforts to combat zombies and vacants. The work during these early stages of the Initiative may help them identify specific barriers. Their next steps will include aligning their policy tools with the emerging best practices to bolster their zombie and vacant work.

VIII. CONCLUSION

LISC has already seen many encouraging best practices emerging from the work of New York cities, towns and villages to mitigate zombie and vacant properties. The flexible LISC Grants and technical assistance have given the municipalities room to experiment and increase their impact. Before the Initiative and related legislation and settlements, the municipalities knew they had a problem, but did not have the resources to address it. Now they can see there are solutions and their efforts are having a positive effect on their neighborhoods. LISC looks forward to working with the 76 municipalities to continue to formulate and implement effective and equitable revitalization strategies that transform vacants from liabilities to assets.

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