

# The Impacts of Commercial Vacant Property on West Broadway Avenue

IDENTIFYING BARRIERS TO  
COMMUNITY-BASED REDEVELOPMENT  
IN NORTH MINNEAPOLIS

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North Minneapolis Promise Zone 

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# INTRODUCTION

For the last decade, vacant, abandoned and deteriorated (VAD) properties have plagued cities across the United States. These problematic properties peaked in the wake of the 2008 Financial Crisis, when foreclosures of residential properties skyrocketed and many cities were forced to become “owners of last resort.” They peaked again in the wake of the 2020 Pandemic, when many businesses downsized their in-person work spaces in favor of hybrid and remote options. Minneapolis, MN was hard hit by these trends, but city government has committed to getting VAD properties back into functional usage. The North Minneapolis Promise Zone, which is situated within the City’s Community Planning and Economic Development (CPED) Department, has partnered with the Center for Urban and Regional Affairs’ (CURA) Kris Nelson Program in order to analyze the City’s current approach to redevelopment of commercial VAD properties. We will begin by describing how the City was empowered to address vacancy in the mid-2010s. Next, we will present theoretical social, public health and economic costs of vacancy as described by the existing literature. Finally, we will present the results of a case-study and survey we conducted for West Broadway Ave in North Minneapolis that demonstrate some of the actual costs of vacancy in Minneapolis and why it is necessary to get the redevelopment process right. We hope to accomplish two goals with this paper. One, we want to encourage a re-evaluation of vacancy policy in Minneapolis that considers not just short-term, “explicit” costs but also longer-term, “implicit” ones. By doing so, the City could lead the country in equitable development while also reaping considerable, albeit hidden, benefits. Additionally, we want to encourage future empirical research into the impacts of commercial VAD properties. Commercial properties occupy some of the most publicly accessible land, and as we shall see, their impacts can be just as deep and even more broad than residential properties. Commercial VAD property research is nascent, but it deserves our attention.

# CITY VACANCY POLICY

Chapter 249 of the Minneapolis code of ordinances, titled “Vacant Dwelling or Building, Nuisance Condition,” governs the City’s approach to managing VAD properties. These properties impose costs on the community: they present an immediate safety hazard, drag down the value of nearby properties, or generally deteriorate the liveability of the surrounding area. The ordinance opens in section 249.20 by recognizing the myriad, compounding impacts of buildings “which remain vacant and unoccupied for any appreciable period of time” (249.20). It then enumerates these impacts, including that these properties “[present an] increased fire hazard...invite the dumping of garbage and rubbish... contribute to the growth of blight within the city...[are] a detriment of the various taxing districts...require additional governmental services...[are an] invitation to derelicts, vagrants and criminals as a temporary abode..[that they] constitute an unreasonable use...[and are] detrimental to the public good and to the common welfare” (249.20).

The explicit recognition of all these costs provides an important public purpose in regulating vacant properties. Since this public purpose often runs counter to the rights of private property owners, it is useful to view Chapter 249 as prescribing the method for balancing these competing interests.

In practice, the governmental entity that works most closely with Chapter 249 is the City’s Department of Regulatory Services (Reg). A graphic describing the full possibilities for Reg’s usage of Chapter 249 is located in the appendix. There are two primary ways that Reg learns of VAD properties and triggers the chapter: 1) through a 311 service request and 2) by word of mouth. Once the chapter is triggered, Reg can acquire several remedial tools, which are summarized in the following bullet points:

- Administrative citation
- The Vacant Building Registration (VBR)
- Nuisance condition: rehabilitation or condemnation

The administrative citation simply empowers inspectors to issue fines for code violations. Since none of these tools are mutually exclusive, it is theoretically possible to use an administrative citation on a VBR or nuisance condition property.

When a property is added to the VBR, Reg acquires additional powers. A VBR property is one that is:

- condemned
- unoccupied and unsecured for 5 days or more
- unoccupied and secured by means other than those normally used in the design of the building (i.e. boarded) for 30 days or more
- unoccupied and has multiple code violations or unoccupied for more than 365 days during which time an order to correct a nuisance condition was issued

Once a property has been added, Reg takes charge of maintaining it and begins to issue an annual \$7,087 fee to recoup its costs. It can suspend the fee if it comes to an agreement with the property owner regarding plans to restore the property. The nuisance condition provides Reg with the widest latitude for regulating vacant property. A property can be deemed nuisance condition if:

- it is vacant and unoccupied for the purpose for which it was erected for a period of at least 6 months
- it is unfit for human habitation according to the minimum standards of the city building codes or has secured openings to the building by unconventional means and has remained in such condition for more than 60 days
- evidence such as neighborhood impact statements can demonstrate that it has diminished nearby property values
- evidence such as a rehab assessment can demonstrate that rehabilitation of the property is not financially viable.

Once a property is deemed a nuisance condition, Reg may directly order it to be rehabilitated or demolished.

The criteria for Reg's tools are expansive, but many of them are rarely used. In conversation with Reg staff, we have discovered a few reasons for this situation. First, legal precedent constrains the City's regulatory apparatus to cost recovery as opposed to punishment. This means that any fines and fees imposed by the City upon a negligent property owner must be traced back to a financial burden borne by the City in the first place. The City is unable to "tax" property owners for their bad behavior, and it cannot turn a profit in its enforcement. Rather, the City must be able to demonstrate that they are simply acting with financial prudence, zeroing the balance sheet through cost recovery. In calculating the fee associated with the Vacant Building Registry, for instance, Reg conducted an analysis of the

direct service and employee hours devoted to the monitoring and enforcement of vacant buildings – eventually arriving at the current figure that represents the marginal costs to the City of managing one more vacant property. And, moreover, this figure is currently under legal challenge.

Another reason why nuisance condition, in particular, is not leveraged is that Reg has no guarantee that it will be able to recoup the money spent on costly rehabilitations or demolitions. Redevelopment makes a property more marketable, but it could take years before a buyer comes through. Indeed, it is likely that an ownership transfer from the City back to the private market would take years because many City-owned properties do not have open RFPs. Although this lack of a financial guarantee explains why more rehabs or demos have not been performed on properties within Reg's portfolio, it does not explain why they have not been performed on CPED or Hennepin County properties. An order to rehab or demo a CPED or County property would obligate CPED or the County to use its budget, not Reg.

One final reason why Reg's tools are not used is that inspectors are worried that the City could become liable to lawsuits from owners. To our knowledge, no lawsuit has ever been filed against the City to invalidate commercial property maintenance work (in part, because this work is so uncommon). Nonetheless, we learned that Reg requires the backing of government attorneys, either City or County, for any substantial action against negligent property owners, but attorneys only get involved in property maintenance cases if there is a significant "paper trail" for a property owner, usually in the form of a number of 311 calls.

Later in this paper we will discuss some of the pitfalls of relying on 311 and a complaint-based system and propose some policy alternatives. That being said, we believe that given the context of Chapter 249's adoption and given what the code actually says, the City has tools to address vacancy that it is simply not using. The current justificatory analysis is limited to a narrow band of direct costs. By conducting a more expansive, and we believe more accurate, accounting of the costs incurred by the City and community as a result of prolonged vacancy, we hope to enhance the case for using these tools.

## SOCIAL COSTS

Many studies demonstrate the social impacts of vacancy. These impacts include the gentrification of vulnerable neighborhoods, often as a result of transit development, and various cultural impacts. The West Broadway corridor is a prominent cultural destination in Minneapolis, but it experiences social impacts due to vacant commercial properties. Vacancy can influence community well-being and fracture ties among neighbors, which can raise concerns about safety and crime (Garvin et al, 2012). Gentrification is also a concern when commercial vacancy is prevalent, which can further impact social ties within the community. These risks are multiplied when major infrastructure projects are planned for the community, such as the Blue Line extension, in the case of the West Broadway corridor. (Lee and Newman, 2021, Metropolitan Council). The potential for gentrification and cultural impacts alone should lead to reinvestment and support along West Broadway.

The City of Minneapolis has plans to extend its METRO Blue Line from Target Field Station northwest to Brooklyn Park, Minnesota, a northern suburb of Minneapolis (Metropolitan Council). According to the “Blue Line Extension Anti-Displacement Report” produced by the Center for Urban and Regional Affairs (CURA), the Near North neighborhood was one of the areas declared to be vulnerable to gentrification due to the Blue Line extension. When comparing the different areas in which the Blue Line extension will travel, CURA found that the Minneapolis portion of the extension, which includes the Near North, Hawthorne, Jordan, and Willard-Hay neighborhoods, were the areas that utilized public transit the most to travel to work, had the lowest rate of car ownership, and have the lowest incomes along the line, all factors when considering vulnerability to gentrification.

With the Near North neighborhood already being vulnerable to gentrification due to the potential placement of the Blue Line extension, this area is at even greater risk for urban decline due to commercial vacancies. Vacancy can lead to gentrification, especially in lower income neighborhoods (Lee and Newman, 2021). In a study conducted in Minneapolis to understand the relationship between vacant properties and gentrification, Newman and Lee found that residential and commercial vacancies were positively associated with gentrification. These properties were at a higher risk for vacancy than any other type of vacancy that was studied. Newman and Lee defined gentrification as the potential for displacement of lower-class populations due to invasions from upper-class ones. This definition seemingly ignores the fact that there is also a racial factor in which neighborhoods



are susceptible to being gentrified. According to the North Minneapolis Promise Zone website, Minneapolis leads the county in racial disparities. Race has been long identified as an important variable for understanding who is vulnerable to gentrification. Developers, architects, and local governments often take a race-neutral approach when discussing gentrification and its potential impacts on certain populations, allowing for the racialized outcomes of exclusionary development to be ignored (Alvaré, 2017).

Another definition of gentrification emphasizes that it can lead to physical, social, cultural, and political displacement of groups of people (Alvaré, 2017). Focusing on the social impacts of gentrification can be useful when trying to understand the ways vacancy can lead to negative social impacts on a neighborhood and community. Cultural exclusion can be and typically is the result of gentrification in low-income neighborhoods. Gentrification can lead to the creation of “white spaces” where people of color may feel unwelcomed (Alvaré). This potential consequence further isolates communities of color that were already pushed out due to the financial impacts, further fracturing community ties. In a case study, Alvaré indicated that the residents of Edgewood Park, defined by Alvaré as a “predominantly Black, working-class neighborhood in a prominent mid-Atlantic city,” experienced enhanced social suffering due to the color-blind approach to gentrification that allowed developers to deny its racialized outcomes.

Among the potential threat of gentrification that vacancy poses, there is also the social perception that exists amongst residents and people who live near vacant and blighted structures. In a study conducted in Philadelphia, Pennsylvania, Garvin et al conducted 50 in-depth interviews with 29 participants to discuss their perceived impacts of vacant land and housing on the health and safety of their communities. According to the interviews, some of the residents reported that the vacancy negatively impacted their mental well-being due to the paranoia and fear of illicit or illegal activity taking place in the blighted areas. Due to the unsanitary conditions of the vacant properties, several residents felt that their health was undermined. The overall neighborhood perception of the vacancy was that the vacancy decreased the community’s control over neighborhood life, which damaged social ties among neighbors. Not only did this raise concerns about safety within the neighborhoods, but it also exerted a negative financial strain on the community. Community perception of the vacancies along the West Broadway corridor will be crucial in understanding their overall social impact.

The study by Garvin et al highlights that when issues in a community fail to be addressed by local government, citizens take actions into their own hands, emphasizing the importance of cultural and social investment in a community. Decline in cities can be accompanied by

social problems and lack of governmental intervention. This lack of governmental intervention can lead a community to lose trust in their government and their sense of identity can be lost (Kim et al, 2020). The West Broadway corridor is known for its significant cultural contribution to the City of Minneapolis and the many community events that already take place there, such as the West Broadway Farmers Market, Open Streets MPLS, and Black Business Week. Investment in the culture of the Northside is crucial when considering the social impacts of commercial vacancy along this corridor. Place attachment, or the state of having psychological and emotional attachment to a geographical location, measures a person's state of distress when forced to become detached from the space (Giulani and Feldman, 1992). Many residents in areas that suffer from historical disinvestment experience detachment from their neighborhoods due to vacancy and urban decline, which in turn can cause emotional and mental distress and fracture social ties (Kim et al, 2020).

Investment in the culture of a neighborhood can only happen through community engagement and making sure a community is intrinsically connected to the processes that shift their realities (Kim et al, 2020). Civic engagement requires an understanding of the issues faced by a community, past and present (Kim et al). Vacancy on West Broadway should not be understood as an example of disinvestment, but an opportunity for reinvestment that is reflective of the community's needs. Engaging with the community and investing in the cultures that exist there can be beneficial not only economically, but socially as well.

# PUBLIC HEALTH COSTS

In recent years, policymakers and practitioners have sought to apply a more holistic lens to public health issues. Central to this effort has been an increasing awareness of how the lived environment, shaped in large part through public infrastructure planning and investment, generates downstream public health impacts. For good reason, this trend has come to a crest in the wake of the pandemic. Activists, journalists, and public officials speak with urgency about the factors that have exacerbated the threat of COVID-19 – linking these risk factors to things like race and social class (Oppel et al., 2020). The existing literature definitively demonstrates the link between public health and neighborhood residence (Bailey et al., 2017). Put simply, historically disinvested neighborhoods can impact the health prospects of those who live there. To account for this phenomenon, researchers point to political and economic decisions that lead to inferior infrastructure, a higher concentration of polluting industries, and a deficit of parks and greenery in such neighborhoods. The framework employed in this analysis is widely referred to as “environmental justice.”

The aim of this section is to apply the lens of environmental justice to the particular issue of durable commercial vacancy. We will first provide an overview of the existing literature on the relationship between vacancy and health, and the relationship between health and neighborhood context more broadly. Of particular concern will be the mechanism by which so-called “environmental toxins” are transmitted through various aspects of the lived environment. In the case of residential dwellings, these mechanisms are somewhat obvious and intuitive. The role of commercial buildings, however, is more complex and more difficult to identify with precision. Yet, as we will argue, this complexity is no reason to discount the role of commercial corridors in the production of positive health outcomes. There are tangible, substantial costs to the tacit preservation of vacant buildings by the government agencies charged with their regulation.

The most definitive thread in this research demonstrates the direct relationship between features of dilapidated housing – such as poor indoor air quality, mold, lead, animal infestations, structural safety hazards, and dysfunctional utilities – and the health outcomes of residents. Cognizant of these impacts, local governments, including Minneapolis, have taken numerous steps to abate toxins in residential dwellings (City of Minneapolis). In most cases, direct transmission of these risks and harms does not occur because of unoccupied

commercial buildings. It should be noted, however, that vacant buildings are often used as informal residence. This practice is referred to as squatting. People seeking shelter or refuge from the public eye illegally enter buildings, particularly when they are inadequately secured with boards. Once inside, the risks of direct transmission are immense. Not only is there the threat of structural decay, overdoses occur in abandoned buildings at disproportionate rates, likely because the victim is less likely to be noticed and treated (Hembree et al., 2005).

A second health risk associated with prolonged vacancy has to do with the impact that abandonment has on patterns of the behavior and social cohesion of residents. Much of the academic work on the topic of street culture and public safety finds its inspiration in the work of Jane Jacobs and her book *The Death and Life of American Cities*. In the book, Jacobs describes with vivid, granular detail the tangle of overlapping uses and purposes in New York City street life. She shows how the seeming randomness is underlaid by a deep functionality, wherein individuals develop a sense of stewardship and accountability for a place and see to its flourishing (Jacobs, 1961).

Essential to Jacobs' equation for cohesive and cooperative public health is the presence of small businesses which attract a flow of patrons and contribute to populous streets. Conversely, the lack of a small business ecosystem that results from widespread abandonment fails to produce this effect. Not only does abandonment cut into a community's level of social trust and cohesion, as described in our section on "social impacts." It also directly challenges a community's ability to create informal mechanisms for ensuring the safety of residents. Working with Jacob's framework in mind, researchers of public safety have looked at the correlation between crime statistics and the prevalence of vacancy. Spelman (1993), for instance, in his work on a low-income neighborhood in Austin, Texas, found that blocks with high rates of vacancy and abandonment had twice the rates of drug and property crime. Other researchers in places like Philadelphia and Baltimore have reached similar conclusions (Taylor, 2001).

Isolating public health impacts at the neighborhood level is notoriously difficult. Not only is it difficult to make comparisons across neighborhoods with such different contexts, it is also the case that neighborhoods select for different kinds of people – primarily along the dimension of social class. Given that social class plays such an outsized role in determining health outcomes, cross-neighborhood comparisons capture too much. They fail to say anything conclusive about something specific like vacancy.

As such, most research on the relationship between public health and vacancy examines

the impact of a specific policy intervention and aims to infer something about pre-intervention landscape. An illustrative example is the greening of vacant lots. Vacant lot “greening” refers to the process of revitalizing vacant lots through removing existing trash and debris, and subsequently planting grass or other greenery. Because vacant lot greening is a point-in-time intervention, it is relatively simple to study the state of public health immediately before, and then in the wake of, the intervention.

A randomized control study from researchers at two prominent public health institutes found, for instance, that people living within a quarter of a mile radius of greened lots had a 41.5% decrease in feelings of depression compared to those who lived near the lots that had not been cleaned (South et al., 2018). Similar research looks at gun violence, and found decreases as high as 29% near treated lots. The intervention in itself also presents something of a causal conundrum. Most researchers theorize that the virtuous cycle originates in salutary psychological effects generated by aesthetically appealing surroundings. This is, of course, in contrast to the negative effects imposed by signs of neglected and deteriorated lots. These “untreated” lots, theorists claim, give rise to feelings of fear, distrust, increased anxiety, and worry over safety (Robinson et al., 2003.) When residents are unburdened from these feelings and concerns, they are more likely to engage in prosocial and pro-health behaviors.

With these benefits in mind, it is possible to identify some of the costs to residents’ public health that vacancy imposes. They are wide-ranging: physical, psychological, and social. The importance of isolating harms of vacancy from the more general harms of poverty and disinvested neighborhoods lies in the fact that the solution is relatively minor and cost effective. This is by no means to argue that investment in vacant lot remediation should come in lieu of broader structural changes. Rather, it is to highlight these policy interventions, positioned as they are within the scope and capacity of what local government can do, as immediate priorities. Furthermore, it is worth considering the utility of investing in vacancy from the perspective of local government finance. The health problems referenced thus far always carry a price tag for government agencies who manage the consequences. In many cases, the populations most directly impacted by vacancy also receive health care and services that are financed or subsidized by the government. Addressing vacancy as an upstream cause of downstream health problems, therefore, can also be a financially prudent decision.

# ECONOMIC COSTS

To someone who has experience with vacant properties, it may seem obvious that they impose numerous indirect economic costs on their communities. Without a doubt, they are correct to think so. But some costs are easier than others to quantify, and many social scientists focus on just one: the costs to surrounding property values. Looking beyond Minneapolis, any city considering a comprehensive cost benefit analysis (CBA) of vacancy must review the methods innovated in previous literature for capturing this cost. Starting with the basis for this field, we will review and evaluate some of the recent literature before starting on our own cost-benefit analysis.

There are many reasons for researchers to focus vacant property CBAs on property values. For one, both city planners and community advocates are highly interested in practical statistics about the costs of vacancy, and declining property values affect the finances of both a city and its citizens. When values decline, a city's property tax assessments also decline, disrupting the composition of its revenue stream (26% of Minneapolis's revenues come from property taxes, larger than any other source). It might be forced to turn to other, relatively regressive revenue sources or ones that increase its exposure to competitive market forces. Over time, however, its general funds will drain, it will be able to provide fewer and fewer services, more and more citizens will leave, and it will be locked in a "death spiral" of exodus and disinvestment. Especially since the 2010 Financial Crisis, very few Midwestern cities have escaped these trends. As for the effects on the finances of citizens, an individual's financial freedom is directly tied to their ability to leverage the equity of their property. When values decline, a best-case outcome is that an individual becomes unable to take out equity-loans. A far worse outcome is that the value left on their mortgage becomes higher than the value of their property and they are foreclosed upon.

It is important to hone the "costs to property values" field not only because it is easily replicable and can proxy the financial health of both a city and its citizens, but also because there is strong theory behind it. Theory predicts that two mechanisms, in particular, lower surrounding property values. First, vacant properties are commonly foreclosed, and once they have gone through this process, they are added to a city's property stock, increasing its supply. Second, vacant properties are commonly abandoned by their owners, and abandoned properties quickly become dilapidated, decreasing the desirability of their locations.

Researchers must determine which of these mechanisms is, in fact, behind any property price reductions, because they have different policy implications. If it is foreclosure that reduces surrounding values, that would imply that foreclosure should be avoided at all costs. On the other hand, if it is abandonment and the resulting disinvestment from owners, resources should be allocated to abating nuisance conditions. Furthermore, it is important to mitigate reverse causality, because although there is strong theory underpinning negative effects of vacant properties, it is universally agreed that vacancy increases with declining property values. Attributing effects to vacant property can be difficult, but over the years researchers have innovated a number of methods for doing so, including analysis by sub-market or census block group and the usage of spatial controls and property-tax delinquency data.

Mikelbank (2009) looked at properties in Columbus, OH and was one of the first studies to consider that previous estimates of the effects of vacancy on property values could be capturing some effects of foreclosure. Put another way, because it is not common that properties are both vacant and foreclosed, there is a tendency to estimate the effects of vacancy and foreclosure in isolation. However, by doing so their effects are overestimated. Similar to previous literature, the study used a hedonic price model, which regresses property values on the various characteristics of those properties, such as square footage, number of bedrooms, and location, along with additional spatial controls. Three models were specified: in the first, property values were regressed on vacancy and foreclosure independently, in the second, both were included in the same regression, and in the third both were included along with the spatial controls. Generally, it is assumed that the effects of vacancy are greater than the effects of foreclosure when distance is lower, and the results of the models seem to corroborate this assumption. In the first model, the vacancy regression is biased towards zero because it picks up the less severe effects of foreclosure, while the foreclosure regression is biased upwards because it picks up the more severe effects of vacancy. On the other hand, in the third model the vacancy effects are high (-3.5%) at 250 ft but decline to insignificance past 500 ft, while the foreclosure effects are low but extend out to all distances (Mikelbank, 2009).

Building on the work of Mikelbank (2009), Whitaker (2012) considered vacancy, foreclosure and tax-delinquency in Cleveland, OH, in the same model. Tax-delinquency was considered because the authors were not able to directly observe the condition of vacant properties. It is assumed that tax-delinquency is a good proxy for property condition because an owner who is tax-delinquent likely has not had the resources to maintain their property in a long time. Observing that it is impossible to control for all of the proximate amenities and disamenities in hedonic price models, the study introduced a control that weighted the



prices of nearby homes higher than faraway homes. Additionally, rather than include all properties across the city in the same regression, properties were disaggregated by poverty level. The authors found it necessary to disaggregate in this way because reverse causality is more relevant to high-poverty areas than low-poverty ones. The primary regressors for the model described whether nearby property was foreclosed, tax-delinquent, vacant or any combinations of those three. Like Mikelbank (2006), the model proved the necessity of disaggregation. The pooled estimate for vacancy was significant at the 0.01% level and large at -1.3%. However, for just high-poverty areas alone, the vacancy estimate was insignificant, while the delinquent estimate was highly significant and large at -1.5%. The vacant and delinquent and delinquent and foreclosed estimates were also significant at -1.0% and -7.3%, respectively. These results imply that delinquency, and not necessarily vacancy, has the greatest effect on surrounding property values, especially when paired with foreclosure. The authors explain that while not every vacant building is in some state of disrepair, delinquent buildings are almost always physically or financially abandoned. For this reason, policies that support nuisance abatement, not necessarily ones that reduce vacancy or foreclosure, are highly important. Finally, the authors were explicit about the replicability of their results: “our study captures housing dynamics that are likely representative of most cities in the industrial Midwest” (Whitaker, 6).

Gerardi (2012) examined properties with a fuzzier definition of foreclosure. Previous studies investigated properties that had completed the foreclosure process, assuming that negative effects on property values could be attributed to foreclosure itself. This study, by contrast, investigated properties that were both slightly and significantly behind on their mortgage in addition to post-foreclosed properties (which are known as real estate owned), under the assumption that it is deteriorated property conditions from reduced owner investment that are behind reduced nearby property values. In reality, it is likely that the foreclosure externality begins long before foreclosure is completed because a property owner’s financial instability begins long before foreclosure. To combat the simultaneity bias of reduced property values increasing foreclosures, a particular problem for high-poverty areas, geographic fixed effects were incorporated. Instead of a hedonic price model, this study used a repeat-sales model, which examines the price of one property over a given period of time. The primary regressor tracked the number of slightly delinquent, severely delinquent and post-foreclosed properties within 0.1 and 0.25 mile radii. While coefficients became relatively stronger when geographic controls were added and when properties were disaggregated by condition, estimates were consistently small, between -0.5 and -1.0 for additional SDQ and REO properties, respectively. Negative impacts peaked before foreclosure and went to zero a year after they were resold. However, similar to Whitaker (2012), the results suggest that property value effects are localized, and pooled estimates



will average small and large effects from particular localities. Furthermore, they suggest that policy should speed properties through the transition from delinquency to foreclosure (Gerardi 2012).

Mikelbank (2009), Whitaker (2012), and Gerardi (2012) were all commissioned in the wake of the 2008 Financial Crisis, when foreclosures were skyrocketing, and each of these studies estimated the effects of foreclosure, either directly or indirectly. Han (2014) marked a pivot away from the foreclosure-focus and towards vacancy, with a special focus on the differences between long-term and short-term vacancy in Baltimore, MD. Like Gerardi (2012), the study used a repeat-sales model with controls for foreclosure and local market conditions. Like Whitaker (2012), market condition controls were used instead of controls for every disamenity for the sake of practicality. The primary regressors in the model were the number of foreclosed properties in p1/p2 and the number of abandoned properties in p1/p2. Effects were broken down by proximity, duration of vacancy and proximity-duration. Every additional abandoned property within a 250 ft radius reduced a property's value by 0.87% and from 250 ft to 500 ft, by 0.14%. Every additional property abandoned for a duration of more than three years and within 1500 ft reduced values by 0.17%. Finally, every additional property abandoned for a duration of more than three years and within 250 ft reduced values by 0.96% and from 250 ft to 500 ft by 0.27% (Han 2014).

Although vacancy is a worsening issue in cities across the U.S., certain areas of the country have experienced greater hardship than others. As a result, there is a tendency in the literature to analyze the same cities along the Rust Belt: Baltimore, Philadelphia, Cleveland, Columbus and Detroit. Noh, Newman & Lee (2020) moved beyond the traditional borders of the Rust Belt, albeit within the Midwest, to analyze Minneapolis. Data for this study came from sales of Minneapolis single family homes between 2006 and 2015. They used a hedonic price model with primary regressors for number of vacant land parcels (VLs) in block group (BG), average area of VLs in BG, distance from nearest VL and size of the nearest VL. The first model pooled BGs, while the second model disaggregated them. Results from the first model yielded negative coefficients for the first two regressors and positive ones for the latter two. In the second model, however, the magnitudes of the coefficients all increased for low-income areas. The marginal VL reduced property values by 0.17%, while an additional kilometer of distance away from a VL increased values by 9.24%. These coefficients were highly significant. A surprising result was that clustered VLs increased property values. This result seems to corroborate the assumption that clusters of VLs are more developable in low-income areas as compared to single parcels, and the authors believed that it could serve as evidence for increased gentrification (Noh, Newman & Lee, 2020).

What can be practically concluded from recent literature on the negative economic spillover effects of vacant properties? The studies look at different regions which have different levels of wealth and different types of abandonment (tax delinquency and foreclosure or long-term and short-term vacancy) with novel methodologies. How comparable or even replicable can these studies be? While the studies produce very different estimates of the effects on property values, on one point, they all agree: vacancy is not a monolithic condition generating monolithic effects. Vacancy in low-income areas is detrimental, but vacancy in high-income neighborhoods is beneficial. Nearby vacant properties impose negative spillovers, but that effect declines exponentially with distance. Above all, properties in good condition impose no spillovers while properties in bad condition impose huge spillovers. Unlike researchers, we are able to observe property characteristics at the micro-level and can, therefore, selectively apply appropriate estimates from the literature for cost-benefit analysis.

We believe that spillover estimates from other cities are reasonably replicable to North Minneapolis because while every city is different, Baltimore, Cleveland and Columbus have endured similar economic and demographic trends. A potentially larger concern is the fact that all of the studies analyzed the effects of *residential* vacant properties, rather than commercial, which is the primary type of vacancy along the West Broadway corridor. However, we do not find this fact to be cause for concern for one primary reason: it is reasonable to assume that commercial vacant properties have a greater spillover effect on nearby property than residential, especially at further distances. For one, commercial corridors thrive on synergy among businesses. The greater the amount of businesses on a corridor and, thereby, foot traffic, the greater the amount of business. Vacancies reduce foot traffic and, thereby, the business potential of a commercial property. Additionally, because commercial corridors are often the public face of a community, they can lead to perceptions of whole communities as “bad” places to live. This perception can extend well beyond the corridor itself to residential properties further away. Finally, since corridors are the public face of a community, they are major targets for nuisance abatement efforts. However, being aligned with major thoroughfares, they are also more susceptible to nuisance behavior in the first place such as littering, dumping and other illicit activities damaging to both the property and the public health of the community. Therefore, we believe that the effects of commercial vacancy on the value of other commercial property is greater than the estimates produced by literature and at least the same, if not greater, for residential properties.

The literature provides a strong case for the direction of vacant property effects. Now, we will outline and start on a CBA to describe the magnitude of the effects. We hope that this work will inform future studies of Minneapolis and help bridge the gap between theory and policy change.

## CASE STUDY

Without a doubt, the gold standard in conducting CBAs of vacancy belongs to the Center for Community Progress. The Center is wholly dedicated to providing direct technical assistance to cities dealing with vacancy issues, and it has developed a CBA methodology that only requires common data and little to no scientific expertise. In a typical CBA the Center breaks down costs into three buckets: service costs, tax delinquency costs and spillover costs. Service costs include work hours spent on vacant property by inspectors and the police and fire departments as well as the direct services to properties, such as mowing grass or shoveling. Tax delinquency costs include all of the pending tax balances on vacant properties that are more than one year old (because most properties pay delinquent balances within one year). Finally, spillover costs entail a meta-analysis, where recent, relevant estimates of the effects of vacancy on nearby property values are applied to a city's local data (Immergluck, Toering, Abdelazim, & Graziani, 2015). Our case study only attempted to replicate this last bucket, but it is our hope that the City of Minneapolis will consider replicating the service cost and tax delinquency buckets, perhaps by contracting the services of the Center.

In the literature review we saw studies estimate the impacts of vacancies on nearby property within 250 ft, 500 ft and 1000 ft. The Center for Community Progress's spillover costs methodology takes estimates like these ones and creates an average that can be applied to a comparable city. We replicated this methodology using the literature review studies and then applied the average to two properties, 2341 Penn Ave N and 818 West Broadway. First, we calculated the average effect: -0.035% (Mikelbank), -0.01 (Whitaker), -0.008 (Han), and -0.0017 (Newman & Lee). To reiterate, the literature review studies only produced estimates for residential property, not commercial property, but we do not find this fact to be a concern because it is reasonable to assume that commercial vacant properties have a greater spillover effect than residential. Our estimate of aggregate lost property value will likely underestimate the actual value. We calculated the average effect to be -0.01385. Next, we constructed rings with radii of 250 ft around 2341 Penn Ave N and 818 West Broadway Ave in ArcGIS. We assumed that all of the property values within this net face downward pressure from the vacancies. Finally, we added the average effect to the net properties' 2022-2023 growth rate, multiplied this adjusted growth rate by the 2022 actual property values and subtracted the 2023 actual property values from our product. We used property values assessed by Hennepin County because we were not able to observe

market values. Since assessors can both undervalue and overvalue properties, we believe that property values are a valid proxy for market values. We were only able to view values for 2022 and 2023, so our estimate effectively treats 2341 Penn Ave N and 818 West Broadway Ave as if they have only been vacant for one year. Since both have been vacant for several years (one decade in the case of 2341), their actual effects on nearby properties have been exponential, and our estimate will underestimate them.

Our calculations reveal that the fifteen properties within 250 ft of 2341 Penn Ave N have lost out on an additional \$61,431.68 in value. The six properties within 250 ft of 818 West Broadway Ave have lost out on \$153,183.77 in value. The nine properties within 250 ft of both 2341 Penn Ave N and 2221 West Broadway Ave, another long-term vacant building, have lost out \$54,286.46.

## SURVEY

Cost benefit analyses can demonstrate that it is in a city's best interest to get involved in redevelopment of vacant properties, but they are not a complete picture of vacancy impacts. On a much higher plane than the financial ledger are the impacts borne by people who interact with vacant property on a daily basis. These impacts are easily captured, but they require actual engagement and conversation with community members. In order to capture some of them, we implemented a survey along the West Broadway corridor. We were specifically looking to learn about the places community members view as assets on West Broadway, the extent to which they believe vacant property is an issue and whether they believe that someone is working on redevelopment of vacancies.

### Methods

We designed the survey throughout August and September of 2023. It contained nine primary questions and two follow-up questions, all of which were either short answer or multiple choice. Three Northside community members volunteered to test it in early October and offered feedback. It went live on Qualtrics on October 25th and stayed open through December 20th. We advertised it with flyers distributed in-person, on Facebook and in Northside working groups. The bulk of our participants came from an in-person tabling session conducted at Cub Foods from November 14th through the 20th.

Our target population for the survey was people who spend significant time living, working or patronizing business on West Broadway. We initially intended to survey two separate populations: the first population would have been individuals who lived or worked within 500

feet of 818 West Broadway or 2341 Penn Ave N, and the second population would have been individuals who frequented the corridor but did not live within the 500 foot buffer areas. However, after launching the survey, we received few responses from population one. For the sake of the report, we chose to analyze the two responses from population one with population two as we felt it was important to include every complete response we received. For population two, our primary population, we verified whether participants fit the target criteria with questions that asked “When you come to West Broadway, how much time do you spend?” and “Please share your zip code.” We received a total of 102 responses, but after cleaning for the target population criteria and incompleteness we were left with 87 responses. We used Excel for all of our cleaning and analysis.

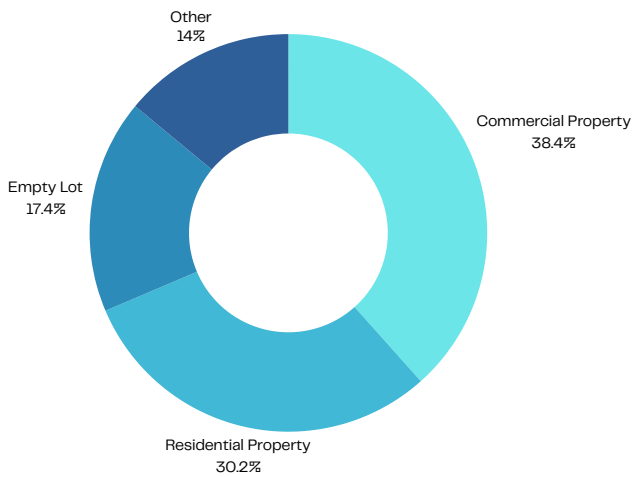
## Results

This survey used a mixed-methods approach, containing both multiple choice and short answer questions. The multiple choice questions aimed to learn more about the assets of West Broadway, if community members frequented the area, and for what purposes. The short answer questions inquired about the community’s desires for future redevelopment and their perception of the commercial vacancies along the corridor. We analyzed the short answer responses separately from the multiple choice responses. In particular, we coded the responses and grouped the codes by theme. All of the codes we developed are listed in the appendix. By grouping responses in this manner we identified community needs and desires.

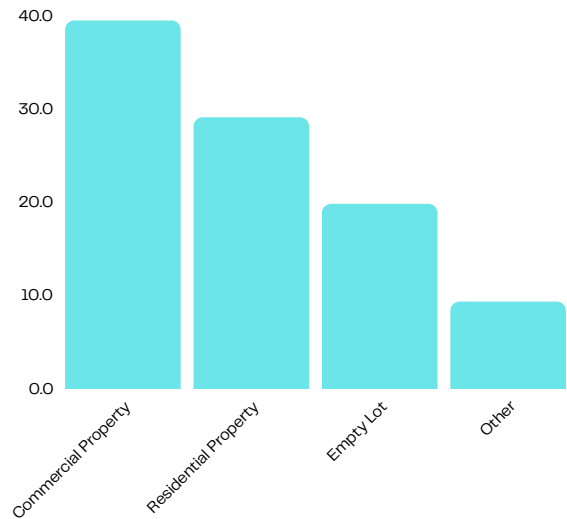
### Multiple Choice Responses

Most respondents indicated that they travel to West Broadway multiple times a week from anywhere between zero and more than four hours. When asked about the type of Northside vacancy that first comes to their mind, most respondents said commercial property. Similarly, nearly 40% of the respondents indicated that commercial properties have the greatest impact on their day to day lives (Figures 1 and 2).

**FIGURE 1 | Q: WHEN YOU IMAGINE A NORTHSIDE VACANT PROPERTY, WHICH OF THESE PROPERTY TYPES COME TO MIND?**



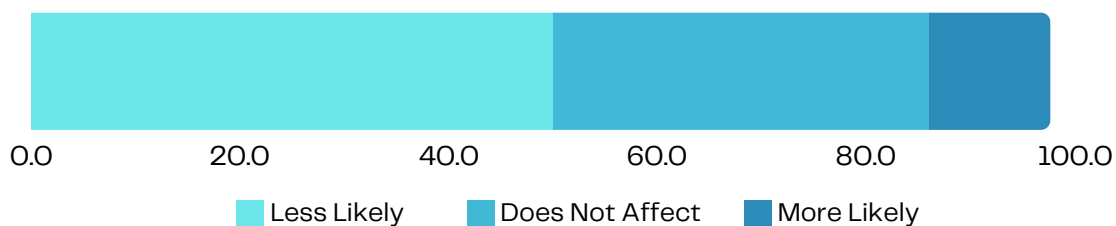
**FIGURE 2 | Q: WHICH OF THESE VACANT PROPERTY TYPES HAS THE GREATEST IMPACT ON YOUR DAY TO DAY LIFE?**



About 50% of respondents said they were less likely to visit West Broadway due to vacant properties (Figure 3). When asked to explain why the vacant properties make them less likely to visit one respondent stated, “[The vacancies] makes it feel like I don’t know if a business is open or vacant or on its way out. [It] also feels unwelcoming.”

About 36% of respondents indicated that vacant properties do not impact their decision to visit West Broadway. Many said that because they considered the vacancies normal, it did not impact their day-to-day. One respondent stated, “I am aware of the disparities in my community and I’m aware that they don’t ask the people that live in the community what to do with the spaces.” Another respondent said that regardless of the vacancies, they would “support the community.” Overall, there was a consensus among this group of respondents that regardless of the vacancies, they would continue to frequent West Broadway, either due to accessibility or because of their strong sense of community.

**FIGURE 3 | Q: DO COMMERCIAL VACANT PROPERTIES ALONG WEST BROADWAY MAKE YOU MORE OR LESS LIKELY TO VISIT OR DO THEY NOT AFFECT YOUR PLANNING?**



**“I’ve lived in North all my life and I have always supported my community.”**

**“I live here and it’s the most accessible location wise. I don’t always have a car and I can ride my bike around the neighborhood. So I need to utilize those businesses. I fear they may go away if we don’t.”**

## **Short Answer Responses**

### **Question: *Where and why do you spend time on West Broadway?***

For many respondents, West Broadway offers convenience and accessibility. For Q4 many stated that they frequent Cub Foods, which is the only grocery store in this area. A significant number indicated that due to living or working in the area, they visit restaurants, patronize businesses, and do necessary shopping. For the same reason, many said that traveling through the corridor is a necessity.

### **Question: *How do you imagine vacant properties being redeveloped?***

Many respondents indicated a need for affordable housing, with one respondent stating, “Maybe more affordable housing/subsidized housing. Just making apartments, but only having one in the whole building for low-income families isn’t helpful.” Another respondent suggested that there is no further need for market-rate housing, but that resources should instead be focused on providing affordable housing.

**“Affordable housing is a HUGE need in the city, not more market rate (or higher) development projects that only benefit the building developers.”**

Many other residents indicated a need for community spaces that serve several parts of the North Minneapolis population. One resident indicated a need for community spaces that serve youth, while a few others indicated a need for community gardens to replace the vacant properties. Several respondents also mentioned a desire for rehabilitation centers and treatment for individuals experiencing addiction and spaces for homeless youth and adult members of the community. There was also a great number of residents who expressed the need for businesses that serve the community.



**TABLE 1 | NEEDS AND DESIRES FOR DEVELOPMENT ALONG THE CORRIDOR**

Needs	Desires
Affordable/Low Cost Housing	Youth Services/Spaces
Community Centered Spaces	Community Gardens
Resources/Shelters for Houseless Individuals	Rehabilitation Centers
More Job Opportunities	
Businesses that Support the Community	

\*needs/desires

**Question: *Have you used the City’s 311 line?***

Slightly over half of respondents indicated that they have used the City’s 311 line at some point. A majority of those respondents said that their concerns were addressed, but a significant number said that it took repeated calls or that their concerns were not addressed at all. One respondent said that the City eventually reached out, but it took over six months to get an update. Another respondent said, “I contacted 311 on 3 different properties with no results.”

**Overall Themes**

Analyzing the survey results as a whole, we identified two themes that stood out: **1) there is a strong sense of community on the Northside, and community members want to support local businesses and 2) there is a collective desire for more resources that benefit the community.** Although there were a few respondents who expressed frustration and discontent with the vacancies along West Broadway, a majority expressed indifference about them. These responses did not write-off vacancies as a non-issue, but they expressed feelings of both defeat and perseverance. Many respondents said that regardless of the vacancies along the corridor, they still make it a point to patronize the businesses so they can support their community. One respondent wrote, “I like supporting local businesses and places in our neighborhood (together with my family) and want my kids to understand why it’s important to do so.” When asked why commercial vacancies do not affect their decision to travel to West Broadway, one respondent said, “[it] makes you not want to be here but you have to,” indicating that for some community members, there is no



choice about where or how they travel within their community.

Many respondents believed that it is the City who is primarily responsible for redevelopment work but that it should be a collaborative effort between the community, non profits, and local developers. A number of respondents went further to say that the City cannot make changes without the input or direction of the community.

**TABLE 2 | OVERALL SURVEY THEMES**

Strong support for local businesses along West Broadway/strong sense of community	Collective desire for resources that benefit the community
Businesses that serve the community*	Community spaces/center*
Frequenting Restaurants	Low rent affordable housing*
Patronizing local businesses	Rehabilitation facilities*
Supporting the community regardless	Youth services/education/engagement*
Supporting programs at The Capri	Shelters*
Collaborative effort in redeveloping	Job opportunities/employment spaces*
	community gardens*

\*needs/desires

Overall, when we asked the community about their perception of the vacant properties along the West Broadway corridor, they expressed various development ideas and critiques of the City. Throughout the survey results, there was a strong sense of community pride, with many respondents expressing their loyalty to the businesses that exist along the corridor and other respondents expressing their desires for development that benefits the community. Respondents desired specialized community spaces for various segments of the community along with opportunities for job development. It is clear from these responses that there is no lack of enthusiasm for development work on the Northside, just some of the means for doing so.

# POLICY IMPLICATIONS

The end goal for VAD properties is their activation and redevelopment by either a private owner or local government. Through our conversations with Reg, CBA case-study and survey, we have discovered several ways that VAD properties fall short of that goal. These shortfalls concern identification, legal case-making, and redevelopment. In this last section we will discuss some practical solutions to those shortfalls.

The first shortfall in the redevelopment process concerns identification. The best way to mitigate expensive rehabs or demos of VAD properties is to not let those properties get dilapidated in the first place. This fact makes identification of newly vacant properties imperative. We learned that in the current process vacancies are identified primarily through 311 or word of mouth. However, the results of our survey suggests that many people on the Northside do not know about the 311 line, will not use it, or have had trouble using it. We acknowledge that our sample was not large enough to be representative and it may suffer from self-report bias, since we were not able to observe Reg's data on code enforcement outcomes. However, one city that Minneapolis is often compared to, Portland, OR, has conducted an analysis of six years worth of code enforcement outcomes, and their analysis offers many lessons for Minneapolis.

The primary finding of the analysis was that Portland's complaint-based code enforcement system was both ineffective and inappropriate. For one, it found that over 30% of the system was bogged down by service requests that were "without merit." In other words, complainants were often filing requests for things that did not actually involve code violations. More critically, however, it found that the system perpetuates racial inequities. Racially concentrated areas of poverty had disproportionately *high* complaint rates and fining rates. The authors determined that in these areas, where gentrification is actively taking place, newcomers would weaponize the system against long-time residents. Because few of these residents could afford the fines, their ability to stay in the community was jeopardized. The system actually accelerated gentrification (Portland City Ombudsman, 2021).

Portland's analysis demonstrates that complaint based systems result in selective application of property codes, depending on the priorities of people who use the reporting system. If those complainants have blindspots to real health and safety violations and

unserious complaints are made instead, the health and safety violations go unaddressed and someone who likely did not have the means to stay on top of property maintenance minutiae is slapped with a hefty fine. What makes this even worse is the fact that in most cities, including Portland and Minneapolis, code enforcement systems are paid for by the fines they issue, meaning they essentially operate as a regressive tax.

**Based on the results of our survey and the results of Portland’s analysis, we believe that Minneapolis’s code enforcement system is undergirded by inequity. Reg should conduct an audit to investigate whether: 1) a significant number of 311 complaints do not actually involve code violations and 2) there are areas of the City with disproportionately high complaint rates or fine rates. If the answer to either of those questions is “yes,” the City should rely on other streams of data for identifying code violations.**

**Shifting to more of a proactive approach, such as the one employed by Minneapolis’ neighbor, Brooklyn Park, would go a long way to achieving more equitable outcomes. One week a year, Brooklyn Park’s code enforcement team uses housing stock, income and complaint data to determine areas of the city to prioritize for outreach. Then, as time allows, inspectors sweep those areas and inform residents about code violations and how to report them. In addition to this program, Brooklyn Park maintains a publicly available map of code violation complaints. This map allows residents to check the status of their report on their own, rather than call in. Since Brooklyn Park deployed these reforms, voluntary compliance with citations is up to 90% and fines have declined from \$300,000 to \$30,000 (Newby and Peterson, 2023).**

**Regardless of whether Reg takes up an audit or a proactive approach, it must deploy an “early warning system” for vacant property. Instead of complaint data, this system would identify vacancies with water shutoff data, commercial licensing data and USPS vacancy data. It would have no dependence on resident knowledge of codes or reporting mechanisms. There is simply no justification for the fact that it has taken years to add several North Minneapolis properties to the VBR.**

The second shortfall in the redevelopment process concerns legal case-making. Chapter 249 is clear about the City’s wide authority and range of tools for dealing with vacant property. However, the “bottom line” is that the redevelopment process cannot proceed without the backing of government attorneys. There is no point to beginning redevelopment work that will only be invalidated on appeal. We learned that case-making gets held up because government attorneys often lack a 311 paper trail and neither the City nor the

County has taken responsibility for managing these cases. The former problem provides further justification for shifting the burden of case-making away from complainants and towards an early warning system and inspector observations. A potential tool for inspectors could be the rarely-used impact statements that are stipulated in Chapter 249. Regarding the latter problem, City staff told us that the County usually handles vacant property cases because the City lacks capacity, while County staff told us that the County only takes them up when illicit activities occur, such as prostitution, gambling or drug use. **Community members do not understand why government attorneys are not standing up to negligent, overly-litigious owners when they have clear justification for doing so. When owners refuse to redevelop their commercial vacant property, they effectively hold communities hostage. These properties affect both the County and City governments, and they must decide how to split responsibility over legal support for redevelopment work.**

The final shortfall in the redevelopment process concerns the actual “redevelopment” work. Identifying vacant properties early will prevent them from going past the point of no return. But what about the large number of properties that have already done so? How do they get turned back into functioning space? And do the returns justify the work? Considering both the explicit and implicit costs of vacancy, as we have done, the answer to the final question is unequivocally “yes.” The results of our case-study suggest that redevelopment can be highly financially beneficial to the City. Just a handful of properties around 818 West Broadway incurred over a hundred thousand dollars in lost property value in just one year. In isolation, this amount translates to just a few thousand dollars in lost property tax and sales tax revenue. But when viewed in aggregate, among the hundreds of other vacant properties on the Northside, let alone broader Minneapolis, the City is currently leaving millions of dollars on the table. Furthermore, the results of our survey demonstrate that there is a strong sense of community in North Minneapolis. Regardless of the presence of vacant property, community members strive to do as much business as possible on West Broadway Ave. This practice is convenient, but it is also about community loyalty. It is not the case that community members are not emotionally or financially invested in the corridor. **The vision Minneapolis has for equitable development necessitates redevelopment work, and it is always cheaper in the long-term to do the work sooner. State, County and City government must leverage more money for this work. Leveraging County and City monies to maintain properties will have the added benefit of clarifying that there is no double standard for code enforcement between public and privately owned property. Closing the financial gap to make the built environment on West Broadway Ave. “people-centered” will attract all new types of business. It will ensure that more North Minneapolis dollars and jobs stay in North Minneapolis and it will provide new outlets for strengthening existing community bonds.**

We have discussed the City's "stick" tool for nuisance abatement, the VBR and nuisance fines, but it also possesses a rarely used "carrot" tool in the form of the restoration agreement. The restoration agreement suspends the VBR fee as long as owners stick to a plan to rehabilitate or demolish their property. Thus far, it has been used sparingly and in one instance, at 2341 Penn Ave N, it was not enforced. **It is highly preferable that private property is redeveloped by its owner. Restoration agreements should become a mandatory part of the vacant property abatement process, and the City should track the successes of agreements and show appreciation to cooperative owners.** When the restoration agreement fails, the VBR and nuisance fines are designed to compel a negligent owner to maintain their property or transfer it to someone who will. If North Minneapolis is any indication, however, VBR and nuisance fines are not sufficiently high or consistent to accomplish these ends. Most owners of vacant properties own multiple other properties, and they can use value losses on one of their properties to offset their total tax burden. **The City should consider scaling fees for vacant property that are issued on a more frequent basis and to prioritize properties where illegal occupancy, loitering and crime is occurring.**

Public properties face different barriers to redevelopment. A property becomes publicly owned after it has gone through tax delinquency. Currently, when property taxes go unpaid, an owner has a period of several years to redeem those taxes. According to state codes, this redemption period could be shortened to as little as five weeks for vacant properties, but we have not heard that the County has ever pursued this path. **In the time it takes for the current redemption period to expire, vacant properties can significantly deteriorate. The City should advocate for shorter redemption periods.** Setting aside the redemption period, a property that goes through tax delinquency has been both financially and physically abandoned. They first go into the possession of the County and they usually are in the worst possible shape, with large special assessment liens. In the case of commercial property, the County wipes away these liens and the property is then sold to the City. Perversely, this system disincentivizes the City from performing work on the properties that need it most because it will not recoup its maintenance costs. It is our understanding that at one time, the County sold properties to the City for one dollar. We have not been able to figure out why this practice ended. Because the current system involves both the County and City, it is clear that much more intergovernmental collaboration is needed. Considering that large benefits are reaped by both the County and City, we believe that the County should shoulder more of the burden of redevelopment. **If it is the City that does the redevelopment work on vacant properties, it should receive the properties at a reduced rate from the County. Otherwise, the County and City should work to split the maintenance and redevelopment burdens evenly.**

We recognize that many of these policy solutions, whether they involve ordinance changes or simple administrative prioritization, face long odds. It is not likely that complaint based reporting systems will go away any time soon. At a time when City staffing levels are historically low, one could not be faulted for saying, “now is not the time to be changing the system.” Furthermore, we do not want our recommendations to be taken as an indictment of government efforts thus far, particularly when we have met with dozens of staff people who are so passionate about these issues.

If there is one thing we wish to contribute to the vacancy policy conversation, it is that many of our redevelopment systems work; only, they work to produce inequitable outcomes that negatively affect the long-term health of the City. Even in cases of complete inaction, the current process is far beyond any one person or team: Reg, CPED, the City Attorney’s Office, the County and the community are all stipulated by law to be involved. We hope that by tracking the full process and describing the guarantees and negotiation it requires, we will foster a shared sense of responsibility and creativity among these stakeholders.

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# APPENDIX

## **SUPPLEMENTARY MATERIALS**

**Regulatory Service Tools Flow Chart**

**Case-Study Calculation Chart**

## **SURVEY AND POSTERS**

**Vacant Property Survey Questions**

**Community Engagement posters**