

Cuyahoga County Vacant and Abandoned Property Action Council (VAPAC)
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 Kirby Date, KM Date Community Planning
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Re: City of Cleveland 10 Year Housing Plan

Mayor Jackson, Chief Rybka, President Kelly, and Members of the Planning Team,

The Cuyahoga County Vacant and Abandoned Property Action Council (VAPAC) is submitting comments below in response to the Cleveland 10-Year Housing Plan draft.

The Vacant and Abandoned Property Action Council (VAPAC)

In the national community development field VAPAC is widely regarded as one of the country's best examples of a collaborative response to the foreclosure and abandoned property crisis. Participants come from 30 civic and non-profit agencies, representing federal, state, county, suburban and urban government as well as academic, philanthropic, land banking and community-based organizations. At its founding in 2005 the idea behind VAPAC was to bring together every entity in Cuyahoga County that touches foreclosure, vacant property, neighborhood stabilization and housing market recovery issues and to ensure that state, county and local efforts are coordinated for maximum community benefit.

When the COVID-19 Pandemic emerged in March 2020, VAPAC led an effort to create a "COVID-19 Working Group" that focused on the impact of the pandemic on renters and homeowners in Cuyahoga County, including an emphasis on at-risk, underserved, and people of color communities. Our

comments below on the City of Cleveland’s draft 10 Year Housing Plan are based on our collective observations of housing issues over the past 16 years combined with our more recent focus on the impact of COVID-19.

General Comment

We applaud the city for undertaking this plan at a time when the city is still struggling to recover from the most severe housing crisis in the past 100 years, and we applaud the emphasis on and sensitivity to racial equity at a time when across the country progress to achieve racial equity is being threatened and even rolled back. One of the strengths of the plan is its emphasis on, and attention to, affordable housing and the challenges facing renters in Cleveland. As noted below, we have some suggestions for further strengthening that aspect of the plan. ***We believe there is one major weakness to the plan – there is virtually no acknowledgement of the continued loss of housing value and loss of financial equity being experienced by Black homeowners in Cleveland, most dramatically in the East Side of Cleveland.*** Racially targeted predatory lending hit the city of Cleveland earlier, and harder, than many other American cities. Predatory Lending (and its impact) is widely regarded as one of the major civil rights issues of the past 20 years. The plan fails to document the massive loss of wealth in the Black community in Cleveland, and fails to prominently include “restoring” that wealth as one of the “pillars” of equity central to the plan. As will be explained in more detail below, we strongly recommend that “Restore” be added as a fifth pillar of Equity alongside Protect, Preserve, Produce and Position. We further recommend that the city and the planning team take whatever additional time is required to remedy this omission.

We offer the comments and suggestions below in a spirit of collaboration and with respect for the hard work that’s been done to develop this draft.

The comments are divided into three categories.

- **Issues and challenges** – instances where we think the plan might be improved by clarifying an issue, more strongly stating an issue or citing an additional issue.
- **Programs and solutions** – recommendations for adding or further expanding a proposed program or solution.
- **Metrics** – comments and suggestions for further refining the measurements of success.

Issues and Challenges

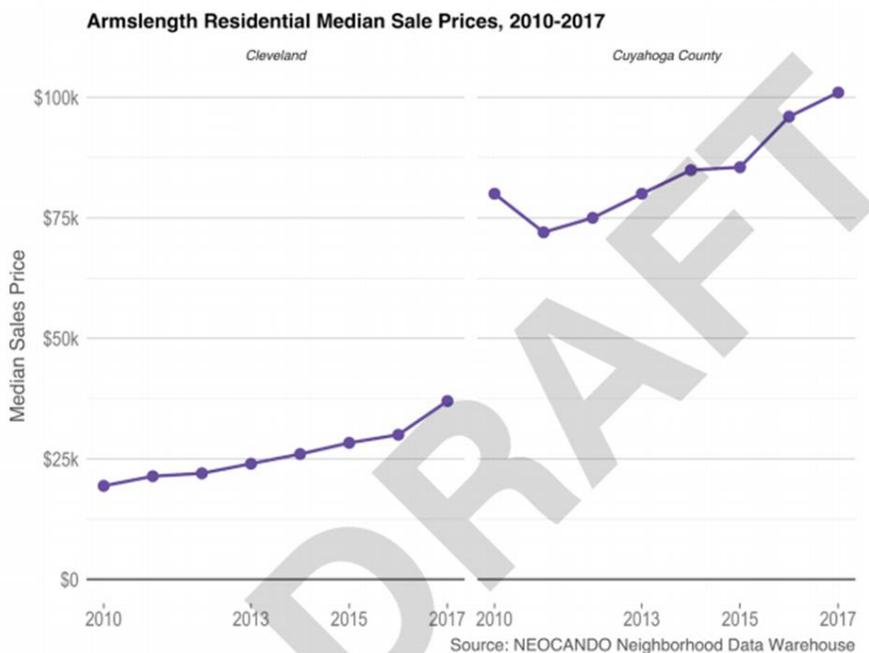
Housing Discrimination. The Full Plan and the Plan Summary make reference to racial divides and racial inequality, and the Existing Conditions Report does a good job of documenting both historical mortgage redlining and current challenges faced by predominantly African American neighborhoods in accessing mortgage credit. But there is only a brief reference to “discrimination” in the full report. Given the

historic and current discrimination still experienced in Cleveland by renters, homebuyers, and home loan borrowers, and given the overarching theme of equity in the Plan, we believe the Plan should be more emphatic in calling out this problem, and boldly state actions that will be taken and investments that will be made to address housing discrimination.

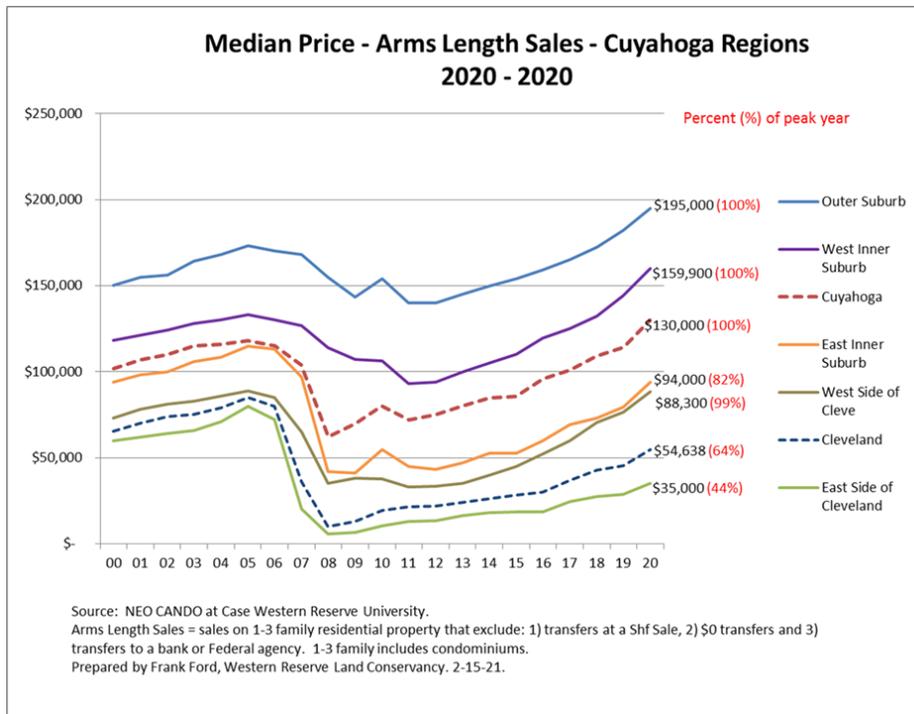
Recommended edit: Add a new bullet to the “Spotlight on Equity” section in the Summary Plan and add similar content to the “Protect” section of the full Plan:

Increase funding to organizations combatting housing discrimination through research, paired testing, education and advocacy.

Loss of Housing Wealth and Value. The Plan, the Summary plan, the Existing Conditions Report, and the Market Study each fail to document - or reference - the tragic loss of housing wealth and homeowner equity experienced by African American homeowners in the East Side of Cleveland. This failure is most clearly represented by the following graphic in the Existing Conditions Report.



While the graphic above correctly demonstrates the disparity between Cleveland and the broader County housing market, the main impression it conveys is that values are increasing. It fails to show the dramatic loss of housing wealth suffered by black homeowners ***in relation to pre-foreclosure crisis values – prior to 2010***. In contrast, the graphic below – which begins in 2000 - reveals the fuller picture for Cleveland and the East Side of Cleveland: while home values are on the increase, there is a massive loss of housing wealth that has occurred, most severely in the East Side of Cleveland. [Note: both graphics rely upon the same arms-length sale data from NEO CANDO at Case Western Reserve University.]



In our opening comment we applauded the 10 Year Plan’s focus on racial equity. The Plan references the influence of predatory lending and foreclosure on the Cleveland housing market, but it will be a significant omission if the Plan fails to acknowledge one of the most tragic outcomes of that predatory activity – the massive loss of housing value and wealth in Cleveland generally, and in the majority African American East Side of Cleveland specifically.

Recommended edit: Add a new bullet to the “Research” section:

Dramatic loss of housing value and homeowner wealth in the majority Black East Side of Cleveland.

Recommended edit: In the “Existing Conditions Report” add a new section 5 entitled “Housing Value” following section “4. Housing Conditions” and before new section “6. Housing Affordability”. This section will need to be drafted and can be based on already existing research published by the Western Reserve Land Conservancy. Land Conservancy staff and VAPAC members will be happy to assist with drafting this section.

https://www.wrlandconservancy.org/wp-content/uploads/2019/07/Cuyahoga-Housing-Trends-2019_7-30-19.pdf

Homes Requiring Demolition. Similarly, the Plan, the Summary Plan, and the Existing Conditions report each fail to cite the extent of crippling blight in the East Side of Cleveland that is still undermining housing market recovery and the recovery of black homeowner equity and value. The Existing Conditions Report simply states “The *number of severely deteriorated structures has declined due to demolitions*, but the number of C-rated structures has grown, indicating continued maintenance

challenges”. These are all true statements – the problem is not with what is said, the problem is with what is left out. In the table below the Cuyahoga Land Bank estimates there are still 3,024 severely deteriorated structures in Cleveland that will require demolition. ***A virtually identical estimate has been produced by the City’s Building and Housing Department as recently as this past summer.***

Demolition Needs in Cuyahoga County in Qualified Census Tracts as updated by the Cuyahoga Land Bank on 6/14/21									
	Vacant and Distressed Properties								
	1-3 family houses			Commercial, Multifamily & Industrial *				All Properties	
	Number of properties	Percent of total	estimated demo cost @ \$12,500 each	Number of properties	Square footage	Percent of total	rough estimate of demo cost @ \$9.50 per sf	estimated demo cost	Percent of total
Suburbs:									
East Cleveland	471	13.2%	\$5,887,500	88	618,771	12.3%	\$5,878,325	\$11,765,825	12.7%
Maple Heights	47	1.3%	\$587,500	1	2,400	0.0%	\$22,800	\$510,300	0.7%
Euclid city	11	0.3%	\$137,500	5	163,952	3.3%	\$1,557,544	\$1,695,044	1.8%
Garfield Heights	18	0.5%	\$225,000	3	10,739	0.2%	\$102,021	\$327,021	0.4%
Cleveland Heights	1	0.0%	\$12,500					\$12,500	0.01%
Highland Hills	2	0.1%	\$25,000					\$25,000	0.03%
Lakewood	1	0.03%	\$12,500					\$12,500	0.01%
Total suburban	551	15%	\$6,887,500	97	795,862	16%	\$7,560,689	\$14,448,189	16%
City of Cleveland	3,024	85%	\$37,800,000	649	4,231,592	84%	\$40,200,124	\$78,000,124	84%
County Total	3,575 ^[1]		\$44,687,500	746	5,027,454 ^[2]		\$47,760,813	\$92,448,313	

In addition, the County Land Bank has determined that 88% of the estimated demolition need in the City of Cleveland is in the East Side of Cleveland where the population is 81% African American. This can be easily verified by the City’s Building and Housing Department.

This finding is also consistent with four studies by the Western Reserve Land Conservancy done over the past 5 years (provided to the 10-Year Plan Team on 11-19-20) that found that structures requiring demolition in Cleveland are overwhelmingly concentrated in the East Side of Cleveland. The Existing Conditions Report failed to cite either the Cuyahoga Land Bank estimate of demolition need, or the City Building and Housing Department’s own estimate of demolition need. Both estimated approximately 3,000 residential homes requiring demolition, with the vast majority being in the East Side of Cleveland. Since the Plan documents derive their recommendations from the Existing Conditions Report, both the Plan and the Summary Plan fail to acknowledge the serious challenge these blighted homes represent for African American homeowners in the East Side of Cleveland, and the role these structures play in the loss of housing value and homeowner equity. As will be noted below in the “Programs and Solutions” section of our comment, the failure to accurately document this problem leads directly to the recommendation that demolition activity be merely “selective”, ***as though there were a relatively small number of severely deteriorated homes impacting the housing market in the East side of Cleveland.***

Recommended edit: Add a new bullet to the “Housing Needs” section of the Plan and the “Research” section of the Summary Plan:

A high concentration of blighted abandoned homes remain in the East Side of Cleveland.

Recommended edit: In the “Existing Conditions Report” the “Housing Conditions” section should be edited to more accurately reflect the extent of concentrated blight in the East Side of Cleveland. This section will need to be drafted and can be based on already existing research published by the Western Reserve Land Conservancy as well as data assembled by NEO CANDO at CWRU, the Cuyahoga Land Bank, and the City’s own Building and Housing Department. Land Conservancy staff and VAPAC members will be happy to assist with drafting this section.

Property Tax Delinquency. Unpaid property taxes pose a growing and grave concern for the stability of neighborhoods. This is referenced in the Existing Conditions Report and the Report does a good job of highlighting some of the issues. However, there are some inaccuracies which we recommend be corrected. The Report cites some data which is now nearly 6 years old. Further, the Report, in a footnote on page 53, suggests that tax delinquency cannot be tracked via the NEOCANDO data system at CWRU. This is incorrect – property tax delinquency amounts can be downloaded and ascertained for individual parcels, Cleveland neighborhoods and the East and West Side regions of Cleveland. A more recent study published by the Western Reserve Land Conservancy, using data from NEOCANDO at CWRU, was provided to the Planning Team on November 19, 2020.

<https://www.wrlandconservancy.org/wp-content/uploads/2019/07/Cuyahoga-Housing-Trends-2019-7-30-19.pdf> In that report 79% of the 19,814 tax delinquent properties in Cleveland were located in the East Side of Cleveland, and 85% of the \$130,009,573 dollars owed were also located in the East Side of Cleveland. VAPAC’s 2015 study of tax collection, along with more recent studies published by the Land Conservancy, show a disparate impact on communities of color in the East Side of Cleveland. Although changes have been made at the county level to reduce the detrimental impact of tax lien sales in challenged neighborhoods, there remains much work to do to assist tax delinquent homeowners who remain in grave danger of losing their homes to tax foreclosure.

Recommended edit: The Tax Delinquency section of the Existing Conditions Report should be updated and corrected, as noted above.

Code Enforcement. The establishment of a systematic and proactive code enforcement inspection process is paramount. According to recent research provided to the VAPAC Investor Working Group by the Building and Housing Department of the City of Cleveland, 46% of all 1-3 family property sales in 2020 in the East Side of Cleveland were to business buyers (as opposed to individuals). This is a nearly three-fold increase in business buyers of residential property since 2004. City-wide, business buyers have doubled in this time period¹. This alarming increase suggests that an aggressive and systematic approach to code enforcement be initiated as soon as possible.

¹ The Existing Conditions Report (page 31) cited a CWRU study in 2020 that found that 23% of **rental properties** were **owned** by a corporate entity. The recent Building and Housing Department analysis found that 46% of **all residential sales** in 2020 were to business entities. Since they were measuring two different things both may be correct but the concern should be whether there is an increase in business ownership taking place. Before this

Recommended edit: The Existing Conditions Report should incorporate the findings of the Building and Housing Department analysis that shows an alarming trend toward an increase of business entities purchasing homes in Cleveland, and specifically, that the greatest increase in this trend is found in the East Side of Cleveland.

Programs and Solutions

Four Pillars of Equity. In both the Plan and the Summary Plan the recommendations are divided into Four Pillars of an Equitable framework. We applaud this concept. However, for all of its strengths, and there are many, this Plan has one significant omission: the Four Pillars fail to address the massive financial harm experienced by homeowners in Cleveland generally, and in the majority African American East Side in particular, resulting from predatory lending and equity-stripping perpetrated by financial institutions during the subprime lending and foreclosure crisis. Documentation of the tsunami of foreclosure and blight, resulting in plummeting median sale prices and associated loss of housing value in the East Side of Cleveland, was contained in 4 studies provided to the planning team on 11-19-20. The injustice of the massive theft of wealth from the Black community in Cleveland was so striking that it prompted the current Mayor of Cleveland to take the unprecedented step of suing 21 banks and Wall Street financial firms in 2008. ***The restoration of housing value and homeowner financial equity should be a core pillar in the Plan's Equity Framework.***

Recommended edit – the Four Pillars should be revised to “Five Pillars” as suggested below:

Equity. The actions in the Plan are designed to **protect** households from housing instability and displacement; to **preserve** existing housing as safe, livable, and affordable; to **restore** homeowner equity and housing value undermined by foreclosure, abandonment and blight; to **produce** a range of housing types in all neighborhoods; and to **position** the City of Cleveland and its partners to achieve these goals. All five of these pillars are rooted in a vision for an **equitable** housing market in which those who have historically been excluded, and continue to be excluded, from housing opportunities are prioritized for those opportunities going forward.

Plan is finalized, the Planning Team should consult with both CWRU and the Building and Housing Department on their respective findings.

PROTECT	PRESERVE	RESTORE	PRODUCE	POSITION
Protect households from housing instability and displacement	Preserve existing housing as safe, livable and affordable	Homeowner equity and housing value undermined by foreclosure, abandonment and blight	Produce a range of housing types in all neighborhoods	Position the City of Cleveland and its partners to achieve these goals
Ensure equitable access to housing resources	Invest in the quality of existing homes	Complete the unfinished job of removing 3,000 abandoned homes undermining housing market recovery	Ensure equitable participation in housing development	Invest in neighborhood infrastructure
Enable equitable development without displacement	Create and sustain a skilled repair workforce	Address the appraisal gap	Create a range of housing choices in all neighborhoods	Increase awareness of and access to housing programs
Protect renters from forced moves and severe rent burdens	Compassionately enforce housing quality standards	Agressively hold accountable irresponsible investors who trade in vacant abandoned property	Create a predictable, practical development process	Adequately fund existing and new efforts
				Hold the city and its partners accountable to this Plan

Protect renters from forced moves and severe housing cost burden. According to the Existing Conditions Report as of 2018 an estimated 42% of Cleveland households (more than 65,000 households) are housing cost burdened. “Cost burdened households make up a significant share of all households in most tracts in Cleveland” (page 37). In addition, there is a deficit of 24,750 available and affordable units for extremely low-income renters. (Page 40). Given the significant number of households with a housing cost burden and facing housing insecurity, we recommend expanding the uses of the city’s Housing Trust Fund to address housing insecurity.

Recommended edit to the “Protect” section of the Plan: add the following bullet under “Protect renters from forced moves....etc”.

Housing Trust Fund. Expand the housing trust fund to not only assist in funding development of affordable units for very low-income renters but also to have funds available (in addition to shallow subsidy) to provide resources for pilot projects to address housing insecurity (e.g. security and rental deposits; short term rental assistance beyond COVID-19; housing mobility and location services; property tax relief [low income and senior homeowners]; assistance to young adults aging out of foster care and individuals reentering the community from the criminal justice system; assistance to seniors to age in place, etc.)

Protect vulnerable homeowners against property tax increases. Both the Plan and the Summary Plan propose property tax relief in their respective “Protect” sections. We support these proposals, but find

they are too limited – being aimed only at situations where property values are escalating. As we noted earlier, the vast majority of property tax delinquency is occurring in the majority African American East Side of Cleveland, where property values are still depressed. It would be a mistake to view this issue merely from a “gentrification” or “hot housing market” lens.

Recommended edit to the “Protect” section of the Plan and the Summary Plan: either add a new bullet related to tax delinquency, or expand the existing bullet:

Property Tax Relief. In addition to seeking state authorization to protect vulnerable households by either capping property tax increases or providing tax exemptions, the city should invest in non-profit housing counseling agencies that are providing financial counseling and helping households enter into payment plans with the County.

Explore Rental Insurance. In the “Protect” Section of both the Plan and the Summary Plan it is recommended that the City explore “rental insurance”, specifically citing in the Plan’s Glossary the “Renters Choice” model enacted in Cincinnati. This is disappointing since during one of the Stakeholder Working Group sessions it was explained that, at the request of Cleveland City Council, the Vacant and Abandoned Property Action Council (VAPAC) investigated the “Renters Choice” model and found that it was not insurance, but rather a Surety Bond masquerading as an insurance product and could leave a tenant exposed to significant, and unexpected, financial liability. The VAPAC findings can be found here: <https://www.dropbox.com/s/7k8alv1u5eelomu/Renters%20Choice%20findings%20and%20recommendations%204-13-21.pptx?dl=0>. Further documentation can be found in this article published in Shelterforce, “Security Deposit Alternatives: The Misleading Marketing of ‘Renter’s Choice’”. https://www.dropbox.com/s/s6pdx78fvbtx41/Security%20Deposit%20Alternatives_Shelterforce_12-10-21.pdf?dl=0

Recommended edit to the “Protect” Recommendations in the Plan and the Summary Plan - borrow language from the VAPAC findings and recommendations, referenced above:

There is a need to reduce barriers to quality affordable rental housing. A security deposit represents one of those barriers, particularly for tenants with limited income and financial assets. Alternatives that reduce the security deposit burden for tenants should be explored, such as paying deposits in installments and/or creating a government or philanthropic sponsored assistance fund. Great care should be taken, however, to avoid private programs that offer the tenant the option of purchasing a surety bond masquerading as renters insurance.

Preserve subsidized affordable housing. We agree with the recommendation on page 18 to preserve subsidized affordable housing, but we suggest it be framed more urgently. The reality is that as multi-family buildings with a project based subsidy fall into disrepair, tenants are usually vouched out and the subsidy is lost and will never be replaced. The city used to take an active role in working to preserve

these buildings and should once again be involved. These are some of the most affordable buildings and can serve very low income tenants. It should be a high priority to save buildings with a project based subsidy.

Recommended edit in the “Preserve” section of the Plan:

*Over 15,000 affordable units in Cleveland’s private rental market may see their subsidy contracts expire **between now and 2030. As multifamily buildings with a project based subsidy fall into disrepair, tenants are usually vouched out and the subsidy is lost and will never be replaced. It should be a high priority in the near term to explore innovative tools to preserve these units as affordable, including rules requiring owners of subsidized rental housing to report approaching expirations and establishing a right of first refusal, as well as mechanisms to finance the acquisition and recapitalization of affordable housing projects.***

Selectively demolish abandoned housing. Because the Existing Conditions Report failed to acknowledge or document the concentration of abandoned and blighted homes in the East Side of Cleveland (documentation that was readily available from NEO CANDO, the Cuyahoga Land Bank, the Western Reserve Land Conservancy and the City’s own Building and Housing Department) both the Plan and the Summary Plan have failed to appreciate the important role that demolition plays in furthering housing market recovery – and the recovery of homeowner equity and value. In the “Position” section, the Plan recommends that demolition of abandoned housing be limited to circumstances where two conditions are **both** met: the home must be “especially difficult to rehabilitate” and the vacant lot, following demolition “can best be redeveloped to provide more diverse, accessible housing options”. Left out of the equation completely are the homeowners and residents in the East Side of Cleveland who will continue to live with dangerous blighted homes next door or across the street, because the City adopted a 10 Year Housing Plan that failed to take their safety, and the recovery of their lost housing value, into consideration.

Recommended edit:

Proceed with deliberate speed to complete the unfinished job of removing 3,000 abandoned homes undermining housing market recovery and the recovery of homeowner equity in the East Side of Cleveland.

The current language “Selectively demolish abandoned housing” should be removed from the “Position” section of both the Plan and the Summary Plan. The above language should be inserted into a new “Restore” section as recommended above.

Code Enforcement. We believe the reference, in both the Plan and the Summary Plan, to “compassionate code enforcement” is too one-dimensional and implies that code enforcement is being used primarily as a tool against low income and senior citizen homeowners. It fails to reflect the other

side of the problem – the need to aggressively hold accountable both investors and property managers whose irresponsible and predatory business practices are further stripping equity and value and undermining housing market recovery in the majority African American East Side of Cleveland. This is a major equity issue since it is black homeowners in the East Side of Cleveland who are bearing the burden of this investor activity.

Furthermore, the Plan should respond to the documented increase in business ownership of 1-3 family homes between 2004 and 2020. The establishment of a systematic and proactive code enforcement inspection process is paramount.

Recommended edit: The Plan’s references to Code Enforcement in the “Preserve” section of the Plan should not be a one dimensional “compassionate” approach but should include a number of elements:

- *Adopt a two-pronged approach: the compassionate approach for small, low-income and nonprofit owners combined with an aggressive approach to hold accountable irresponsible investors and their property managers who flaunt Cleveland’s housing codes and regulations.*
- *Authorize and instruct the law department to hold accountable local agents of out-of-state owners, and if necessary work with city council to strengthen ordinances to accomplish greater accountability.*
- *In light of the growing increase in investor ownership, maximize enforcement of the city’s rental registration ordinance, with corresponding interior and exterior inspections including lead testing, to ensure life, health and safety. If necessary, work with city council to strengthen the ordinance to accomplish greater accountability.*
- *Budget for, and schedule, a repeat of the 2015 and 2018 property inventory surveys to support systematic code enforcement and ensure resources are deployed to the most distressed properties and at-risk neighborhoods.*

Home Mortgage Lending. The Existing Conditions Report did a good job of documenting both the historical redlining and the current challenges faced by predominantly African American neighborhoods in accessing mortgage credit. In addition, the Plan proposes a number of specific programmatic tools to increase home repair and home purchase loans. However, we were surprised to find no mention of the fact that the City of Cleveland is widely regarded as the first city in the country to leverage its massive cash deposits at banks to encourage banks to meet the credit needs of underserved communities. It is worth noting that Cuyahoga County recently became the first county government in the country to employ a similar strategy. The Plan could (and should), without compromising any of the individual programs proposed, recommend that Cleveland continue to leverage its deposits at banks. Having said that, Cleveland could do more to maximize the potential of these arrangements. For example, the city has allowed each of their bank agreements to be treated as a “trade secret” by the bank, which means

they are not a public record and cannot be viewed, studied or monitored by housing and community-based organizations. This may be the result of Cleveland being the first at a time when there was no roadmap for how to proceed. But Cleveland should be encouraged to continue to leverage its banking agreements, and encouraged to improve on them.

Recommended edit: At minimum the following should be added to the “Protect” section of the Plan since at its core this is about protecting access to resources for both homeowners, as well as tenants who could become homeowners.

Continue to leverage the city’s cash deposits, investments, and service contracts with banks to encourage increased access to mortgage credit and other banking services for low income, people of color and underserved communities. Best practices should include:

- *Agreements with banks should be treated as public records, fully transparent with open access for review and monitoring by housing, community and civil rights organizations.*
- *Fund research that enables the city to monitor and track the progress of participating banks as well as non-participating banks to compare the performance of participating banks to their peers.*
- *Convene an annual public hearing to disclose the results of bank performance, and receive public comment from citizens as well as housing, community development and civil rights organizations.*

Metrics for Measuring Success

We applaud the inclusion of a scorecard/report card in both the summary plan and the full plan. This reflects a willingness on the part of the City to be held accountable for outcomes. However, we believe there are a number of metrics missing in light of the issues we’ve raised above. Further, for transparency, and for the purpose of furthering racial equity, we believe some metrics should be tracked by both traditional neighborhood boundaries as well as by the two traditional regions of the city – the West Side of Cleveland and the East Side of Cleveland. The difference between the East Side of Cleveland, 81% African American population, versus the West Side of Cleveland, 19% African American population, cannot and should not be ignored in a plan whose underlying theme is racial equity. This will be facilitated by the fact that the Plan already references the NEO CANDO data system at Case Western Reserve University, and virtually every data point in that system can be associated with both traditional neighborhood boundaries as well as the East Side and West Side regions.

Median Home Sale Price. The scorecards in the Plan and the Summary Plan make no reference to tracking housing market recovery in general and the recovery of housing wealth and value in the majority African American East Side of Cleveland in particular. This would be a significant omission for a Plan that is grounded in racial equity.

Recommended edit: the Housing Scorecard/Report Card in both the Plan and the Summary Plan should be edited to include an annual tracking of median home sale price in neighborhoods, as well by the East Side and West Side regions of Cleveland. The median sale price data is produced each year by NEO CANDO at CWRU.

Property Tax Delinquency. The scorecards in the Plan and the Summary Plan do track the number of households that will be given property tax protection. While we support including this metric, it will depend on getting the state legislature to authorize either a cap on tax increases or a tax exemption for vulnerable households. This could be a long campaign. In the meantime, as we recommended above, the city can also work with housing counseling agencies to help taxpayers get on payment plans to reduce their delinquency and avoid tax foreclosure. And, since these issues disproportionately impact the majority African American East Side of Cleveland and its individual neighborhoods, the metrics should track tax delinquency by those geographies.

Recommended edit: the Housing Scorecard/Report Card in both the Plan and the Summary Plan should be edited to include an annual tracking of:

- *The number of residential class delinquent parcels in neighborhoods, as well by the East Side and West Side regions of Cleveland.*
- *The amount of residential class tax delinquency in neighborhoods, as well as by the East Side and West Side regions of Cleveland.*
- *The number of residential class parcels on payment plans in neighborhoods, as well as by the East Side and West Side regions of Cleveland.*

Home Mortgage Lending. The scorecards in the Plan and the Summary Plan do track a number of lending metrics, including the share of mortgage loans to applicants of color. We support all of the metrics proposed, but suggest the following additional metrics to provide a fuller assessment of progress, or lack thereof, for bank lending in Cleveland.

Recommended edit: the Housing Scorecard/Report Card should be edited to include an annual tracking of:

- *Home repair and home purchase mortgages by neighborhoods, as well by the East Side and West Side regions of Cleveland.*
- *Small dollar home purchase mortgages by neighborhoods, as well as by the East Side and West Side regions of Cleveland.*
- *A ranking of the top lenders in each category and geography. This information will be useful to the city in its negotiations with lenders.*

Thank you for the opportunity to comment on the draft 10 Year Housing Plan. Please contact us if you have questions, or if we can be of further assistance.

Sincerely,

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