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DATE: September 13, 2018

RE: Preliminary Assessment of Vacancy and Abandonment Challenges
in Ogdensburg, New York: Observations and Recommendations

The Center for Community Progress (Community Progress)¹ has been retained by the City of Ogdensburg (“City”) to provide technical assistance in support of developing a more effective, efficient, and equitable approach to vacant, abandoned, and deteriorated properties (“problem properties”).² This engagement was designed to advance the objectives of the grant awarded to the City through LISC’s Zombie and Vacant Property Remediation and Prevention Initiative (“Zombie Grant”),³ as well as leverage the City’s authority to create a municipal land bank and to explore with stakeholders how to optimize this new tool as part of a comprehensive approach to vacancy and abandonment.

Pursuant to the above goals, the engagement involved a two-day site visit in order to carry out two distinct projects: (1) Conduct a preliminary assessment of the key systems related to vacancy and abandonment, and (2) Design and lead a half-day training for the newly seated board of the Ogdensburg Land Bank (“Land Bank”).

The two-day site visit to Ogdensburg took place on July 31 – August 1, 2018, and was conducted by a team of national experts from Community Progress (“Community Progress Team”) that included Tarik Abdelazim and Matt Kreis. Following a half-day training for the new board of the Land Bank (“Land Bank Board”), the Community Progress Team spent the remaining 1.5 days meeting with elected officials and senior leadership of the City, as well as representatives from community organizations that could likely play a role in a more coordinated effort to stabilize and revitalize neighborhoods in Ogdensburg.⁴

¹ The mission of Center for Community Progress is to foster strong, equitable communities where vacant, abandoned, and deteriorated properties are transformed into assets for neighbors and neighborhoods. Founded in 2010, Community Progress is the leading national, nonprofit resource for urban, suburban, and rural communities seeking to address the full cycle of property revitalization. The organization fulfills its mission by nurturing strong leadership and supporting systemic reforms. More information is available at www.communityprogress.net.

² For purposes of this memo, the term “problem properties” will be used to collectively refer to any vacant, abandoned, or unoccupied deteriorating residential property that exhibits signs of distress, including but not limited to recurring violations of housing and building code; tax delinquency; prolonged vacancy; lack of utility services; or criminal activity.

³ To read more about the Zombie Grant Program and award recipients, see the [NY OAG’s 10/11/16 press release](#).

⁴ To view a full list of site visit participants, please see Appendix A.

This memorandum offers preliminary observations of current conditions and challenges, as well as recommendations that the City and its partners might consider as they move forward with their efforts to more effectively address the negative impacts of problem properties. These observations and recommendations are informed by the two-day site visit as well as the following:

- A preliminary review of recently completed and ongoing initiatives in the City, an online scan of relevant news and documents (such as budgets, end of year reports, and GIS maps), and multiple phone conversations with the City's designated liaisons for this engagement.
- A preliminary review of state and local law and policy pertaining to housing and building code enforcement and delinquent property tax enforcement systems, two key systems related to vacancy and abandonment.
- Community Progress' expertise in the systems of vacancy and abandonment—including data management, housing and building code enforcement, delinquent property tax enforcement, and land banking—and extensive knowledge of in-state and national best practices and creative interventions to minimize the negative impacts of problem properties.

Based on the research and discussions with a broad set of Ogdensburg stakeholders, the Community Progress Team identified the following key takeaways:

1. **Local Leadership.** There is consensus that the City is moving in the right direction under the current leadership. The Mayor, City Council, and City Manager share a common vision and purpose, and are tackling the legacy of fiscal challenges with determination. An openness for honest conversation about the City's fiscal challenges and appropriate solutions was also evident in our conversations about the systemic causes of problem properties in Ogdensburg and potential solutions. There is a readiness to chart a new course that prioritizes long-term goals over short-term interests, and reason to believe that this leadership team will drive responsible reforms that better align practices, policies, and resources as part of an effective, efficient, and equitable approach to vacancy and abandonment.
2. **Underlying Economics.** The City of Ogdensburg continues to struggle from the loss of anchor industries that were major employers, such as the closings of the Diamond International paper mill plant and the Standard Shade Roller plant, as well as the major downsizing of the state hospital. The pattern is all too common—as jobs leave, so do the people. Between 1950 and 2010, Ogdensburg lost almost a third of its population (from 16,166 in 1950 to 11,128 in 2010). The population decline has caused a significant imbalance in housing supply and demand, similar to countless other legacy cities and many rural communities that were built around a single major industry. While the goal for City officials should always be to attract and retain investment and individuals, this work needs to be done with an honest understanding of these underlying economics. Some of the most

obsolete and deteriorated housing stock will need to be demolished, as much of the existing stock as possible should be protected from further decline, and new housing projects might be limited to those that add diversity to the current inventory, both in product and price-point. Such a market-sensitive approach will require systems-level reforms, improved coordination among partners, and a more effective alignment of policies, practices, and resources.

3. **Data Management Systems and Practices.** The City’s approach to data collection, integration, mapping, and analysis is limited, primarily due to outdated software systems and significant budgetary constraints. Moreover, there is a significant need to properly identify, categorize, and prioritize the different types of problem properties. Improved data sharing, mapping, and analysis—and clear agreement on what the data means—will help the City (i) develop a common understanding of the problem (the scope, scale, and nature); (ii) predict, track, and resolve more quickly the various types of problem properties; and (iii) plan and implement more strategic neighborhood interventions and investments. The Development Authority of the North Country (“DANC”) is an untapped resource that ought to play a more supportive role for either the City, the Land Bank, or both.
4. **Code Enforcement.** The Division of Code Enforcement (“Code Enforcement”), which has two full-time enforcement staff, has accomplished a great deal with very limited resources. A rental registration and inspection program is reportedly operating with a 90% compliance rate. Working in partnership with the Department of Public Works (“Public Works”), nuisances like trash/debris and high grass/weeds are reportedly enforced and abated, when necessary, in a timely manner. The City’s new Zombie Coordinator has helped identify problem properties and track down owners and responsible parties, providing dedicated attention on some of the most challenging vacant and abandoned properties.⁵ However, it’s clear that systems-level reforms in data management, delinquent property tax enforcement, and land banking—and improved coordination among all departments—could significantly enhance Code Enforcement’s ability to deploy limited enforcement resources in a more strategic, proactive, and preventative manner.
5. **Delinquent Property Tax Enforcement and Land Banking.** The current practice of selling tax liens to enforce delinquent property taxes provides the City with a much-needed infusion of cash, and that benefit is real and important. However, the practice of selling tax liens to speculative, third-party purchasers has plenty of drawbacks; not only is the City giving up its leverage to intervene and potentially direct the transfer of the problem property to a new, responsible owner, but the practice of selling liens also creates real barriers for the Land Bank to cost-effectively and efficiently acquire inventory. If the Land Bank and the City want

⁵As part of its LISC Zombie Award, the City carved out two years of funding for a new position, Zombie Coordinator, to provide dedicated support to advancing the goals and objectives as outlined in the City’s grant agreement.

access to a greater inventory of problem properties that might include those that are ripe for potential reuse needs, there will need to be significant reform to the system of tax enforcement—one that likely eliminates or greatly reduces the number of tax liens offered for sale to private investors.

The remainder of this memorandum categorizes our observations and recommendations under the following key systems of vacancy and abandonment: (1) **data management and collection practices**; (2) **housing and building code enforcement**; (3) **delinquent property tax enforcement**; and (4) **land banking**.

Although *occupied* problem properties are occasionally referenced, the primary focus of this memorandum is how these key systems impact *vacant and abandoned* problem properties. This is because vacant and abandoned properties generally impose the most significant harm on communities and because a community's approach to *vacant and abandoned* problem properties (i.e. mitigate the harm imposed, quickly put the property on path to reuse) must necessarily differ from its approach to address *occupied* problem properties (i.e. preserve or improve the quality of housing, offer equitable resources to vulnerable owners or tenants).

Finally, the observations below are provided for consideration by City leadership and are based on our experience working in similar communities across the nation and within New York. None of the information contained in this memorandum should be construed as legal advice, and all policy observations are subject to the review and guidance of local legal counsel.

DATA MANAGEMENT AND COLLECTION PRACTICES

At the core of a comprehensive approach to problem properties is data: parcel data, market data, and civic data (community input). The routine, timely collection and analysis of these datasets helps to identify problems before they emerge, reveal the nature of each individual problem property, point to appropriate and equitable solutions, and plan and implement long-term revitalization strategies. Many local governments understandably lack the capacity and systems to allow for a robust practice of data collection, integration, and analysis, but small, cost-effective measures can be taken to break down data silos and enrich interdepartmental discussions and cross-sector coordination. Establishing a foundation of common terms and basic data management practices sets the stage for incremental learning across all departments and agencies, and opens the door for new policies, programs, and strategies that are laser-focused on the identified problems.

Observations

1. A clear understanding of and consensus about the exact scope, scale, and nature of vacancy in Ogdensburg is lacking. When asked how many vacant properties exist in Ogdensburg, interviewees either stated “I don’t know” or gave a wide range of estimates, from 50 to 300.
2. There is inconsistency and/or misunderstanding across departments and with key stakeholders about which terms to use when describing problem properties. For example, some interviewees were unaware what “zombie properties” meant. Others used it to describe *any* vacant property, which not only is inconsistent with New York State (NYS) law and the field of practice, but also makes it difficult to discuss and reach agreement on which tool, strategy, or intervention is most effective and appropriate for each problem property.
3. There is confusion about the inventory of publicly owned properties in need of maintenance by the City, generally referred to by City officials as “surplus properties.” At the time of our visit, the City’s surplus properties list, as advertised online, included 21 properties. However, the Director of Public Works reported he is responsible for maintenance on 200 City-owned parcels, not including those with public uses (parks, facilities, etc.).
4. While there is some communication across departments, the systematic and routine sharing of parcel data is not occurring. This is a common finding of local governments, particularly those with significant or longstanding fiscal challenges.
5. There seem to be multiple interdepartmental groups, such as the Zombie Task Force and the Property Committee, investigating the negative impacts of problem properties, or making decisions about a *specific category* of problem properties. The Land Bank Board is now a third group that will be convening and discussing strategies and making decisions on another subset of problem properties – vacant, abandoned, and tax delinquent properties.
6. The City contracts with DANC for IT/GIS support, but has yet to fully embed DANC representatives into the City’s efforts.
7. The Police Department currently is unable to aggregate and analyze criminal activity by parcel due to the limitations of outdated software. However, the Chief reported that the Department relies on the State’s Crime Analysis Center in Malone for crime mapping and other data needs.
8. Despite financial challenges, the City recognizes the need to update systems and in the most recent budget included funds for upgrades to financial/accounting software and police software.

Recommendations

9. Consider developing a one-page educational resource that lists the various categories of problem properties that the City is trying to identify and address, distribute it widely among staff and partners, and make it available on the City’s website for the general public. Suggestions for different types of problem properties are included in Appendix B.

10. With agreement on the categories and definitions of the various problem properties, revisit existing lists managed by City officials, such as the Zombie Coordinator's Property List, and reclassify each property accordingly. Use these categories and definitions consistently across all departments.
11. Resolve the discrepancy / misunderstanding regarding the City's inventory of public parcels. To better understand this inventory, sort properties into three possible categories based on potential of marketability and disposition: (i) properties that are or could be used for a public purpose (parks, facilities); (ii) vacant lots (including nonconforming, residential lots) or vacant and abandoned properties that could be marketed and sold to private purchasers (or transferred to the Land Bank to be marketed and sold); and (iii) parcels accumulated over decades in need of maintenance but with little to no market potential (abandoned easements, median strips, steep slopes, etc.). Once a master list of public parcels is finalized, establish procedures for how updates to this list (including acquisitions and dispositions) will, in a timely fashion, be recorded, maintained, and distributed to all appropriate parties within City Hall (and posted online), including those parties with maintenance responsibilities and those with planning, marketing, and redevelopment responsibilities.
12. Consider creating a single interdepartmental **Problem Properties Task Force** ("Task Force") that meets once a month, and that is chaired by the City Manager or her designee. At a minimum, the Task Force should include representatives from Code Enforcement, the Fire Department, the Police Department, the Finance Department, the Assessor's Office, the Department of Planning and Development, staff and/or members of the Land Bank Board, DANC, and the City's General Counsel. The Task Force would replace the two separate existing committees and ensure the City's approach to vacancy and abandonment is not case-by-case or segregated, but holistic and comprehensive. Initial work might be to discuss this memo, create and build consensus around a six-month action plan, and monitor implementation. If needed, individual workgroups could be created to tackle some of the action items, and these smaller workgroups could meet every other week and even involve members outside of City Hall.⁶
13. Action items for the Task Force's six-month action plan could include the following:
 - a. Establish a baseline of available property-related data and identify additional datasets that are not currently tracked but could easily be collected by simply modifying existing inspection reports or forms.⁷

⁶ For example, the City of Albany created a Vacant Properties Task Force in May 2017 that is chaired by the Zombie Coordinator who is accountable to Mayor Kathy Sheehan. The Task Force established four workgroups over the summer of 2017, and both the Task Force and workgroups have met regularly since to sustain communication, coordination, and implementation. Maps are presented at every meeting, which has prompted conversation that has become more and more sophisticated over time. Community groups are seated on the workgroups, and the Task Force has played a critical role in sharing knowledge, aligning systems, reforming practices, and piloting new programs and policies.

⁷ For ideas for additional datasets to collect, consult p. 13 of Community Progress' report *Neighborhood Stabilization in Waterbury, Connecticut: Recommendations to Build a More Proactive and Comprehensive Approach to Vacancy and Abandonment* available at: https://www.communityprogress.net/filebin/Community_Progress_Waterbury_Assessment_Final_12.20.2017.pdf.

- b. Develop a plan to engage local residents and other volunteers to conduct a property conditions survey to better understand the scale of the various types of problem properties that exist.
 - c. Conduct outreach or host convenings in various neighborhoods to solicit resident input to compile a “Top 10” list of problem properties. Focus Task Force efforts on these ten properties and celebrate any successes (securing an open building or demolition) with the community and residents.
14. Consider inviting DANC to participate in the Task Force and provide GIS mapping support in order to raise awareness and spark more meaningful dialogue about trends, challenges, and solutions. Brief monthly map presentations, conducted either remotely or in-person, can also help City Departments understand how small changes to data collection practices within their own “silo” can allow for better integration with other datasets and richer analysis.
15. The Task Force might consider providing DANC with some initial datasets for mapping purposes, and could start with the following:
- a. Historic tax lien data, highlighting those properties that did not redeem over the last ten years. It would be interesting to know where these properties are, and further analysis (such as overlaying code violations and police calls) might help determine whether these properties are destabilizing neighborhoods or placing an undue burden on city services.
 - b. Master list of public parcels (as described in #10 above), color coded by category.
 - c. Valid rental certificates.
 - d. Zombie properties (and *lis pendens* filings for this calendar year).
16. As new financial software is implemented, local officials ought to keep in mind the Task Force data needs, and design with ease for integration.

HOUSING AND BUILDING CODE ENFORCEMENT

Housing and building code enforcement is a City’s primary means of *preventing* vacancy and abandonment, but enforcement in communities across the country is typically done in a reactive manner that tends to be inequitable, inefficient, and ineffective⁸ Moreover, the enforcement of housing and building code in many communities ends up being a “one-size-fits-all” approach that focuses more on punishment than compliance. Ogdensburg bucks the trend. For such a small division (two staff), Code Enforcement boasts some impressive successes, including a proactive rental inspection program that reportedly has a 90% compliance rate. It seems likely that if the City and its partners better categorize problem properties, move forward with systems-level reform, and

⁸ To learn more about what constitutes an equitable, efficient, and effective approach to housing and building code enforcement, see *Alternative Strategies for an Equitable, Efficient, and Effective Code Enforcement System in Mobile, Alabama*, a June 2016 Community Progress report, authored by Frank Alexander, and available at: https://www.communityprogress.net/filebin/FINAL_Strategic_Options_for-Mobile-Alabama-Code-Enforcement-June-2016.pdf.

implement an effective land bank, then Code Enforcement will be in a better position to target their limited resources where they can achieve maximal impact.

Observations

1. The City has limited code enforcement capacity. The City's Division of Code Enforcement is run out of the Fire Department and consists of two full-time Code Enforcement staff – the Code Enforcement Officer and a Housing Inspector (a second Housing Inspector position is vacant and may go unfilled).
2. The Fire Department is trained and experienced in many aspects of housing and building codes. According to the Fire Chief, the Fire Department employs 28 firefighters and firefighter supervisors, all of whom are certified as NYS fire safety inspectors. Five of the 28 firefighters are also NYS certified code enforcement officers, though there does not appear to be much cross-division collaboration on housing and building code inspection related work.
3. The City does a good job with extremely limited Code Enforcement resources. The Code Enforcement Officer and Housing Inspector are charged with:
 - a. Responding to all housing and building code complaints
 - b. Inspecting properties for high grass, accumulations of trash/debris, junk vehicles, and other exterior violations (see Observation #5 for role played by Public Works)
 - c. Inspecting properties for exterior, structural violations
 - d. Enforcing the City's rental inspection and certificate of occupancy program
 - e. Identifying "unsafe" properties for condemnation and demolition
 - f. Identifying zombie properties and administering the City's Zombie Grant
4. The City reported that 781 code violations were issued in CY2017 and estimated a voluntary compliance rate of 75-80%.
5. Enforcement of high grass/weeds and accumulation of trash/debris violations involves both Code Enforcement and Public Works, and the process appears both timely and effective. Code Enforcement generally responds to the complaint or identifies the violation and Public Works sends the notice to correct, and, if necessary, abates the violation.
 - a. Through August 31, Public Works reported it had mailed 90 violation notices for high grass/weeds and completed 33 corrective actions. When Public Works crew are dispatched to remedy a high grass/weeds violation, the City bills for the work **and it** appears that all costs, including administrative costs, are included. If unpaid, the amount is rolled to the tax bill, a common practice in New York communities. The Director of Public Works explained he had successfully advocated for a local ordinance change that allows for escalation of fines for repeat offenders in a single season (\$100 for first violation, \$250 for second violation, and \$400 for subsequent violations in the same calendar year).

- b. When a property owner fails to respond to a violation notice of accumulated trash/debris, Public Works hires a local private contractor to abate the nuisance. The Director reported he has a budget of \$6,000 a year to support this work, which is usually insufficient to meet the need in the community.
6. The City's rental registration and inspection program seems to be well-managed. All multiple dwellings and one- and two-family rental units must be registered with Code Enforcement. Registration must include the contact information for the building owner, the number of units, and, if the owner doesn't live in St. Lawrence County, a managing agent for the property. In addition to the units being registered, the units are subject to an interior inspection at least once every three years to ensure compliance with fire safety and property maintenance standards. The City reports that approximately 90% of the estimated 1,300 rental units in the City have a valid certificate through the City's rental program.
7. The Code Enforcement Officer, a senior staffer with 29 years of experience, reports that the rental program has definitely helped improve the quality and safety of units. In the early years of implementation, the major issues found were zoning in nature (illegal conversions, bedrooms in the attic with no heat, etc.). Now, the issues primarily uncovered through the rental program are property maintenance issues.
8. Multiple interviewees expressed worry that many homeowners (homeownership rate is 61%, according to the 2012-2016 Census data) are deferring maintenance because of either declining wealth or a lack of confidence in the neighborhood's future.
9. According to the City's General Counsel, the vast majority of property owners who appear in housing and building code enforcement cases brought to City Court (20-25 per year) have no financial ability to make repairs, much less pay a fine. The General Counsel reports that he could work with the judge, and often does, to craft judgment orders and tie them to compliance instead of simply assessing a fine.
10. City residents have limited access to housing programs. The City has occasionally secured Community Development Block Grant allocations from New York's Housing Agency (Ogdensburg is not an entitlement community) to support housing repair or homeownership programs, but the grant awards are sporadic and administration of the grant awards can strain the limited capacity of City staff.
11. The Police Chief explained that meth labs are a major problem, and that these illegal labs are often found in *substandard occupied rental properties*, not vacant properties.
12. Code Enforcement reports about 150 vacant properties and 62 "zombie properties" throughout Ogdensburg. However, it's not clear if these are duplicative. Moreover, upon further discussion with enforcement staff about the zombie property inventory, it seems this number is over-reported and includes vacant properties that do not have a mortgage interest involved.

13. Over the last five years, the City has used a variety of grant funds to demolish 11 properties, some of which were large commercial/industrial sites. Of the City-owned inventory that is confirmed, the City reports that four of them need to be demolished.
14. Public Works has completed demolitions of City-owned properties under certain conditions, and reports doing so at a much lower price point than private contractors. The Director of Public Works reported that his team can demolish a standard residential property for about \$6,000.⁹

Recommendations

15. Explore ways to boost capacity for the enforcement of housing and building codes. Acknowledging the good work performed by a small, resourceful enforcement team, interviewees' concerns about hoarding, drug houses, and substandard occupied rentals suggest additional capacity could help. Given the number of Fire Department officers who are also trained to inspect for housing and building code violations, as well as Fire Safety violations, there may be an opportunity for cross-departmental support to increase Code Enforcement capacity. It might make sense to explore the merits of a one-year pilot for firefighters to work with Code Enforcement, either in a specific zone of Ogdensburg or on a specific type of vacant property, evaluate outcomes, and then adjust, expand, or cancel based on findings.
16. Consider permitting the escalation of fines for repeat offenders in a calendar year for other code violations that are identified and issued by Code Enforcement. However, in practice, this ought to be reserved for only the most egregious owners whose neglect does not stem from limited financial resources. For those local individuals who do appear in court with claims of financial hardship, the City's current approach of focusing on compliance rather than fines is commendable and ought to continue.
17. Consider asking North Country Housing Council (NCHC) to include Ogdensburg in all its future housing grant requests, and if possible, collaborate to make this an ongoing program available to income-eligible city homeowners to make basic to moderate repairs, especially roof replacement and curb appeal projects.
18. Consider tapping the City's in-house demolition expertise to support Land Bank interventions. Few municipalities the size of Ogdensburg have the in-house capacity and expertise to carry out small-scale residential demolitions. This service is a tremendous asset and presents a very interesting opportunity for the Land Bank to contract with the City for demolition services, or for the City to provide this as an in-kind service to the Land Bank, which could help leverage other grant funds.

⁹Though the presence or likely presence of asbestos will drive this number up substantially.

DELINQUENT PROPERTY TAX ENFORCEMENT

Tax delinquency is one of the most accurate indicators of abandonment, and it is critical to develop and implement enforcement systems that are first and foremost equitable, but also efficient and effective.¹⁰ Due to the fiscal stress most communities are under, a singular goal often drives delinquent property tax enforcement approaches: the timely collection of taxes. While such approaches are understandable, they can often create harmful impacts “downstream” or in the long-term, especially in neighborhoods with weak housing markets or in decline¹¹

Thus, the City’s current approach of selling tax liens is understandable but problematic for two key reasons: (i) the City is transferring the power of tax foreclosure to a third-party purchaser, relinquishing control of the property’s future to an individual who is motivated not by the public good but by personal profit and gain; and (ii) the City is denying the Land Bank cost-effective and predictable access to tax foreclosed properties. Fortunately, all interviewees seemed to understand the drawbacks of the City’s current approach and are supportive of looking at a number of alternatives so long as the likely short-term financial impacts can be mitigated.

Observations

1. Some of the City’s fiscal challenges stem from the extensive inventory of assessed land that is tax-exempt. The Assessor reported that there are 3,984 taxable parcels in the City. According to a February 2018 report by the NYS Comptroller’s Office, Ogdensburg is ranked third among all cities in the state for percent of total assessed land value that is tax exempt (59%), following Salamanca (64.9%) and City of Albany (63%).¹²
2. The City collects and enforces property taxes for the Ogdensburg School District, and St. Lawrence County, and makes both parties whole as collections allow. The City is the only jurisdiction in the County that assumes these services. For all other school districts and municipal taxing bodies in St. Lawrence, the County enforces delinquent property taxes and does it through a judicial *in rem* foreclosure process (see Observation #14 for additional observations on this process).
3. The City has been facing significant fiscal challenges as evidenced by the City’s bond rating downgraded to junk status last June.¹³ However, the current leadership and City Council have recently taken action to correct course: taxes were increased, positions throughout City

¹⁰ See Appendix C for a brief description of what constitutes an effective, efficient, and equitable delinquent property tax enforcement system.

¹¹ For in-depth examinations of the impacts of tax lien sales, see the following two reports by Community Progress: (1) *Assessment of Baltimore City’s Tax Sale System: Impacts on City Finances, Vacant Properties, and Vulnerable Owner Occupants*, 2016, available at https://www.communityprogress.net/filebin/CCP_BaltimoreTASP_Final_Report_102616.pdf; and (2) *Analysis of Bulk Tax Lien Sale: City of Rochester*, 2013, available at <https://www.communityprogress.net/analysis-of-bulk-tax-lien-sale--city-of-rochester-pages-401.php>.

¹² In Salamanca, the primary type of tax exemption is ‘Indian Reservation.’ In Albany and Ogdensburg, New York State accounts for the majority of the land value exempted. In Ogdensburg, the state facilities include the Ogdensburg Port Authority, two correctional facilities, and a psychiatric hospital.

¹³ <http://www.watertowndailytimes.com/news05/moodys-drops-ogdensburg-bond-rating-more-than-expected-20170621&template=mwdt>

Hall have gone unfilled or eliminated, services have been slightly reduced, capital projects and purchases have been delayed for two years in a row, and immediately following the rating downgrade, the City formally requested assistance from the State's Fiscal Restructuring Board, whose review is currently underway.

4. The severely depleted fund balance presents real cash flow challenges, and as a result, the City relies on short-term borrowing to help fund public services and operations throughout the year. The Finance Director reported that this has consistently been about \$1.8 million per year but will likely be reduced to about \$1.6 million in the coming fiscal year.¹⁴
5. For decades, it has been the City's approach to offer individual tax liens for sale at an annual auction as the way to enforce delinquent property taxes. The enforcement of delinquent property taxes proceeds as follows:
 - a. Tax bills are sent on or before April 15 of each year. Tax bills include special assessments that are unpaid from the previous year (including interest) and other charges like sewer, water, mowing, and demolition charges, that are unpaid from the previous year.
 - b. Tax bills are payable in two installments during designated "collection periods." The first installment is due between April 15th and by May 15th. The second installment is due between July 15th and August 15th.
 - c. If taxes are unpaid on the first day after a collection period, they are considered delinquent. On that day, a 5% penalty is added to the total amount of the unpaid tax bill for the first 30 days or fraction thereof. A penalty of 1% is added for each additional month taxes are delinquent.
 - d. If the taxes and special assessments remain unpaid on October 1, or 9 months after the tax levy was placed against the property, the City Comptroller "shall" advertise and sell the property in accordance with the RPTL. According to officials, the advertisement is usually placed in May, thirteen months after the tax levy was placed against the property.
 - e. Tax liens are sold by public auction and each parcel of property is offered separately. The City has the discretion to withhold tax liens from the sale for any reason.
 - f. The winning purchaser agrees to charge the property owner the lowest amount of interest to redeem. However, the Comptroller can reject any bids on any parcel and enter a bid for the City at the maximum rate of interest allowed (12%). The City is also deemed the purchaser for any parcels that do not receive a bid at the maximum rate of interest.

¹⁴ To put this short-term borrowing in perspective, the City's 2017 General Fund Budget was \$13,444,210 and all funds (water, sewer, community development, library, and museum) in 2017 totaled \$20,332,456.

- g. The City Finance Director continues to collect delinquent payments on all tax liens sold, and remits these payments to the successful bidders in a timely manner (often weekly).
 - h. If the property is not redeemed within two (2) years of the date the taxes became a lien on the property (the date of default, not the date of the lien sale), the Comptroller will execute and deliver a deed to the purchaser upon request.
- 6. Because of the use of the tax lien sale, the City is unable to offer payment plans for those property owners who may have become delinquent due to temporary loss of employment, health issues, or other unexpected financial hardship.
- 7. The City provided excellent data regarding the last three tax lien sales (2016 – 2018), which is provided as Appendix D, and what follows are some insights and trends:
 - a. For the last three years, the number of properties with unpaid taxes by the date of the sale was consistently about 275, with an average total debt of \$705,000.
 - b. Each year, the City withheld about 45 properties from the sale, and offered approximately 230 for sale.
 - c. Over the three years, there has been a slight decline of tax liens bought by third-party purchasers, which means more liens are defaulting to the City.
 - d. Looking at the amount paid by third-party purchasers as a percentage of the total amount of the liens offered at the sale, the number has dropped year-over-year: 85% in 2016, 75% in 2017, and 63% in 2018. In other words, the City is recovering less and less of the debt owed at the auction. When the value of the liens withheld from sale are included, the City only collected about 53% of the debt owed at the 2018 auction.
- 8. According to City officials, the redemption rate of liens sold to third-party purchasers has traditionally been about 95%. The redemption rate of liens defaulted to the City has traditionally been about 90%. This means that each year about 5-8 properties per year could be subject to foreclosure by lien purchasers, and 5-8 by the City. However, the number of properties that did not redeem jumped this most recent year to about 15 from both the “purchaser pool” and the “City pool.”
- 9. The higher redemption rate among the liens sold to third-party purchasers means the City is giving away the extra interest and penalties from the most favorable liens, and being left to address the liabilities of the least favorable liens.
- 10. Local stakeholders shared a common belief that the current process yields less than optimal outcomes and exhibited a sophisticated understanding of the interests of third-party lien purchasers—that they want to profit off the interest and penalties and have no interest in actually acquiring the property. In fact, multiple stakeholders reported that purchasers who end up with an unredeemed lien will either walk away from the property or foreclose on the lien and then walk away. The latter is a more recent occurrence after the City prohibited

from the tax lien sale any individual that had previously purchased a tax lien and refused to request a deed from the City after an owner had failed to redeem.

11. Code Enforcement reported that the current approach to delinquent property tax enforcement is likely the source of some of the more complicated cases in the neighborhoods, and makes owner identification and accountability difficult.
12. Throughout the national field of practice, the delinquent property tax foreclosure process is the single most important pipeline of inventory for land banks. However, the City's current practice of enforcing delinquent property taxes by selling tax liens means that the potential inventory for the Land Bank is both limited and unpredictable (not sure which will redeem).
13. Without reform to the system of delinquent property tax enforcement, inventory of the Land Bank is likely limited only to:
 - a. The City's existing portfolio of surplus properties, many of which are vacant lots.
 - b. Tax delinquent properties where the tax lien defaults to the City at the tax sale and where the owner does not redeem—and these properties will more often than not include significantly distressed structures.
14. If the Land Bank and the City want access to a greater inventory of properties that might include those types of property that are ripe for potential reuse needs, there will need to be significant reform to the system of delinquent property tax enforcement – one that likely eliminates or greatly reduces the number of tax liens offered for sale to third-party purchasers.
15. There are other delinquent property tax enforcement mechanisms available to the City under NYS law that are more effective, efficient, and equitable. For example, St. Lawrence County uses a judicial *in rem* foreclosure process to enforce delinquent property taxes on behalf of the other municipalities and school districts in the County.¹⁵ Under NYS law, enforcement through judicial *in rem* foreclosure differs from enforcement through the sale of tax liens in the following ways:
 - a. The foreclosing governmental unit has the ability to offer payment plans of up to 18 months during the redemption period.
 - b. The redemption period takes place before the enforcement event (the *in rem* foreclosure) instead of after (the tax lien sale).
 - c. Interest and penalties from redemptions accrue to the benefit of the foreclosing governmental unit.
 - d. The foreclosing governmental unit has discretion to direct the property into the hands of a responsible end user, including a land bank, with insurable and marketable title.

¹⁵ See Article 11 of the NYS Real Property Tax Law.

Recommendations

16. If the focus of reform to the delinquent property tax enforcement system is to ensure the Land Bank has optimal access to tax delinquent properties, the City and Land Bank may want to explore the following four options:
- a. **Status Quo** – City continues to sell tax liens, even though trends suggest that the single benefit of this approach—an immediate infusion of cash—seems to be waning year-over-year.
 - b. **Strategic Intervention** – City and Land Bank identify specific parcels for City to pull from tax sale. Still, any or all of these liens may be redeemed—which is in itself a favorable outcome—but it does mean the Land Bank will have no predictable acquisition strategy, making planning for interventions and grant requests difficult.
 - c. **Land Bank as Lien Servicer** – Instead of auctioning the individual tax liens to third-party purchasers, the City would transfer in bulk all tax liens to the Land Bank for the amount owed. The Land Bank would need to secure upfront cash to make the annual payment to the City, which it could do through bonding, and it would also need to build the capacity, operations, and expertise to service the liens and foreclose on any unredeemed property. To the best of our knowledge, no land bank in the country is routinely assuming this role as servicer of a municipality’s delinquent tax digest.
 - d. **City uses only judicial *in rem* foreclosure** – The City could eliminate the sale of tax liens, enforce delinquent property taxes through judicial *in rem* foreclosure, and transfer to the Land Bank any or all unredeemed properties acquired through foreclosure. Models of how judicial *in rem* foreclosure is deployed in conjunction with local land banks can be found throughout the state and across the country.¹⁶
17. A fifth option to consider is for the City (and Ogdensburg School District) to emulate all other taxing bodies in the county and **consolidate property tax collection and enforcement services to the County**. This option comes with major benefits and some potential drawbacks. The benefits would be that the City’s cash flow challenges would be resolved—the County would make the City whole, and not just on taxes, but on all other liens (code liens, delinquent water bills, etc.). Additionally, the City would no longer be financially responsible for the School District’s levy. However, it’s not clear what the ramifications would be to the Land Bank, since this would be the first land bank approved by Empire State Development (ESD) that subsequently relinquished its role as a foreclosing government unit. This needn’t be a reason to abandon this option. It simply means that local counsel will need to consult with State representatives at ESD

¹⁶To learn more about the range of practices across New York, see the 2017 report *New York Land Banks: A New National Standard*, authored by Community Progress in partnership with the New York Land Bank Association, available at <http://syracuselandbank.org/wp-content/uploads/2017/05/NYLBa-publication-FINAL-05-04-2017.pdf>.

about the potential implications to the creation and authority of the Land Bank if this option were to be pursued.

18. The shift to a new enforcement system is not without drawbacks. For example, in the short term, the City will lose the “up-front” infusion of cash that the sale of tax liens provides. There are likely funding options out there to help the City bridge the gap from this loss of immediate cash, at least until the City can “catch up” to the redemptions that will eventually come. For this reason, the City is encouraged to put this financial challenge front and center in discussions with the Financial Restructuring Board, and explore what NYS might be able to do to assist with this transition. Given the well-documented economic and fiscal costs imposed by vacant, abandoned, and tax-foreclosed properties, having the State’s assistance in moving away from an approach (tax lien sale) that *exacerbates* these challenges to an approach that *minimizes or resolves* these challenges is reasonable and responsible.¹⁷
19. As the City considers whether to move to a new delinquent property tax enforcement system, like judicial *in rem* tax foreclosure, the City and local legal counsel will need to review to what extent existing law under the City’s Charter needs to be amended. For example:
 - a. If the City chooses to eliminate the sale of tax liens and move to an entirely judicial *in rem* system, City Charter § C-81 will likely need to be amended to remove language stating that the City shall sell tax liens 9 months from the date the tax was levied against the property.
 - b. City Charter § C-80 already requires that if the City owns a tax lien that remains unpaid for two (2) years, it shall foreclose on the lien in an *in rem* proceeding under Article 11, Title 3 of the NY Real Property Tax Law (judicial *in rem*). The extent to whether this requirement aligns with the City’s current practice or whether it will need to be amended to allow for a wholesale shift in how the City enforces delinquent property taxes is entirely at the discretion of the City and local legal counsel.

¹⁷Community Progress has overseen multiple Cost of Blight studies for community partners, including Toledo, OH (https://www.communityprogress.net/filebin/160630_TASP_LCLRC_Toledo_Cost_of_Blight_Study_Final.pdf) and Atlanta, GA (<https://www.communityprogress.net/blog/cost-blight-research-atlanta-tells>). Also, a 2017 report commissioned by Community Blight Solutions, *Understanding the True Costs of Abandoned Properties: How Maintenance Can Make a Difference*, quantifies the direct costs and long-term effects of foreclosure and abandonment on communities (http://www.communityblightsolutions.com/files/CBS_White_Paper_2017.pdf). Finally, the Vacant Property Research Network conducted a comprehensive review of the literature on blighted properties, and summarized in their white paper much of the research on the costs of blight (<https://vacantpropertyresearch.com/blight-literature-review/>).

LAND BANKING

The newly created Land Bank offers the City a new tool to address problem properties.¹⁸ As an alternative to the speculative auction, land banks are designed specifically to help communities direct tax foreclosed properties to responsible ownership to ensure predictable outcomes that are consistent with community priorities and neighborhood goals.¹⁹ The greatest challenge to the Land Bank, as described in the prior section, is the City's current practice of selling tax liens to third-party purchasers to enforce delinquent property taxes. However, as the City and Land Bank mutually explore how to align systems and practices for optimal impact, there are a number of actions the Land Bank can and should consider to position it for success in both the short- and long-term.

Observations

1. The Land Bank currently has no dedicated staff. The City's Director of Planning and Development has assumed a lead role in supporting and administering the Land Bank, and according to City officials, other municipal staff are available to provide in-kind support as needed.
2. The newly seated Land Bank Board is comprised of community members that bring an exceptional level of relevant experience and skill-sets to the work of stewarding problem properties back to productive use. While this core group positions the Land Bank for success, interviewees identified multiple stakeholders as needing to be more engaged and involved in order to advance the Land Bank's short- and long-term goals, including but not limited to the school district, senior leaders at major state facilities, and nonprofit partners.
3. The Land Bank Board has yet to formalize policies or identify key strategic goals, but board members seemed to share a common interest in expanding housing products and choices (from infill modulars to a community of townhouses), demolishing the most harmful properties in Ogdensburg, and when possible, supporting the City's efforts to spur redevelopment along the waterfront (on remediated sites that used to house major industrial employers).
4. The immediate focus of the Land Bank Board and support staff is on developing an application for the fourth round of funding of the Attorney General's Community Revitalization Initiative (CRI).²⁰ The maximum award is \$2 million with applications due September 7.

¹⁸The City received approval from ESD in May 2018 to create the state's 25th land bank, which at the time was the last slot available (the state's cap of 25 land banks has since been increased to 35). According to our knowledge, the Land Bank will be serving the least populous area in the country.

¹⁹For a detailed review of land banks and land banking programs, see *Land Banks and Land Banking, 2nd Ed.* by Frank Alexander, Co-Founder of and Senior Legal and Policy Advisor at Community Progress. The report is available for download on the Community Progress website at: http://action.communityprogress.net/p/salsa/web/common/public/signup?signup_page_KEY=8679.

²⁰Since 2013, the New York Office of Attorney General has committed more than \$50 million to eligible New York land banks through three rounds of funding of the CRI, with funding secured through settlements with banking and financial institutions for misconduct that contributed to the housing crisis (<https://ag.ny.gov/feature/land-bank-community-revitalization-initiative-land-bank-cri>). Two more substantial settlements announced

5. Members of the Land Bank Board cited as key challenges for the work ahead a lack of funding, limited capacity, and the need for strong community buy-in. The City's current approach to delinquent property tax enforcement was not identified as a likely challenge.
6. While members of the Land Bank Board stated that the tax foreclosure process would eventually be the most important pathway for acquisitions, they identified parcels already owned by the City as the first targets for acquisition. However, many members were surprised to learn that, as of August 2018, the City only had 21 surplus properties listed for public review, and 18 of these were vacant lots, many of them nonconforming.²¹
7. Many of the stakeholders that were interviewed during the two-day site visit admitted a limited understanding of land banks and raised some great questions. However, after learning more about the purpose, role, and potential of a local land bank (as well as its limitations), all of those interviewed expressed universal support and interest for this new tool.

Recommendations

1. Given the City's financial challenges, as well as the limited in-house capacity, the City and Land Bank might consider requesting the maximum amount of operating funds in its CRI grant application to support either hiring a dedicated staff member or contracting with the City for a number of services, such as planning, management, and property inspections and maintenance. The latter option could allow the City to create a senior planner position that reports to the Director of Planning and Development and focuses a majority of their time on Land Bank planning, administration, and implementation.
2. The Land Bank should explore how to make better use of DANC's IT/GIS expertise to support its planning, decision-making, and community education and outreach efforts. As DANC's access to municipal parcel data improves, the Land Bank should consider carving out the first 15-minutes of every board meeting for the remote presentation and discussion of a relevant map.²²
3. After the CRI application is submitted in September, the Land Bank ought to focus on the following two key areas to build community support and gain community trust:
 - a. Policy development. First, policies *must* be developed, approved, and made public before the Land Bank completes any transactions. Consider implementing a community-based approach as a bold rebuke to the public's usual (and justified) characterization of "land deals made behind closed doors." Embrace transparency and accountability. Defy expectations and reset them. Land Bank Board and support

earlier this year will help fund a fourth round of CRI, and applications are due September 7, 2018. Over prior rounds, almost all Land Banks have used CRI funds to hire dedicated staff or contract with local agencies to provide management and implementation services.

²¹Based on on-site discussions, it appears the number of surplus properties is approximately 45, but not all the deeds have been recorded. The online list will be updated accordingly once the deed recordings are complete.

²²For an example of how useful a robust mapping system can be, explore the Toledo Survey Mapping Tool, a link to which can be found here: <http://co.lucas.oh.us/2783/The-Toledo-Survey>.

staff are encouraged to reference the policies of other New York Land Banks, and tailor the content as needed to meet local preferences and goals.²³

- b. Community education and engagement. Second, any work that involves the acquisition of private property by public entities will likely raise concern and could easily be misunderstood. *It is critical for the Land Bank to prevent misunderstandings.* The City is small enough that an aggressive community education and outreach campaign through the remainder of this year could prove very beneficial. The Land Bank and City might consider co-hosting two educational events to explain the function and mission of a land bank and highlight best practices in New York, discuss the CRI grant application/award, highlight opportunities for partnerships, and solicit input and feedback. One event could be a *Roundtable for Strategic Partners* (anchor institutions, School District and County officials, regional economic development council leaders, state facility representatives, realtors and contractors, nonprofit agencies, etc.); and the second event could be an *Open Community Forum*. Making sure the community understands the work and goals of the Land Bank is key, and the most opportune time for this aggressive push may be over the next six months.²⁴

CONCLUSION

The challenges presented and costs imposed by vacant, abandoned, and deteriorated properties are common across all communities, but the unique systemic causes need to be carefully reviewed and understood by leaders and stakeholders before designing locally appropriate solutions and strategies. The City of Ogdensburg is well positioned to take meaningful actions on systemic reforms, evidenced by leadership that is committed to questioning and upending the status quo. Community Progress hopes this memorandum of observations and recommendations into the key systems of vacancy and abandonment provides guidance and support to the City as it moves forward with an equitable, effective, and efficient approach to these challenges.

²³ See, for example, the policies and procedures of the Greater Syracuse Land Bank available at: <http://syracuselandbank.org/about/#policies-and-guidelines>.

²⁴ The Lucas County Land Bank (Toledo, OH) shows its commitment to sustained and authentic community education and engagement by employing a full-time Director of Community Engagement (see <http://co.lucas.oh.us/Directory.aspx?DID=167>). The Tri-COG Land Bank (Allegheny County, PA) clearly and transparently outlines its process for identifying and acquiring potential land bank inventory on its website (see <https://tricoglandbank.org/about/process/>).

APPENDIX A. STAKEHOLDERS INTERVIEWED FOR PRELIMINARY ASSESSMENT

Community Progress thanks the following participants for sharing their insights and experiences during the two-day site visit to the City of Ogdensburg on July 31 – August 1, 2018.

<u>Name</u>	<u>Title</u>	<u>Department/Organization</u>
Wayne Ashley	Mayor	City of Ogdensburg
David Price	Councillor	City of Ogdensburg
Sarah Purdy	City Manager	City of Ogdensburg
Andrea Smith	Director of Planning and Development	City of Ogdensburg
Tim Johnson	Director of Finance	City of Ogdensburg
Andy Kennedy	Police Chief	City of Ogdensburg
Mike Farrell	Fire Chief	City of Ogdensburg
Scott Thornhill	Director of Public Works	City of Ogdensburg
Andrew Silver	General Counsel	City of Ogdensburg
Sue Arquette	Assessor	City of Ogdensburg
Greg Mallette	Code Enforcement Officer	City of Ogdensburg
Nicole Woods	Zombie Program Coordinator	City of Ogdensburg
Coralee Barrett	Administrative Secretary to the City Manager	City of Ogdensburg
Douglas McDonald	Board Member	Ogdensburg Land Bank
Gary Hammond	Board Member	Ogdensburg Land Bank
Kathie Wade	Board Member	Ogdensburg Land Bank
Laura Pearson	Board Member	Ogdensburg Land Bank
Marcia Lemay	Board Member	Ogdensburg Land Bank
Phillip Cosmo	Board Member	Ogdensburg Land Bank
Thomas Hannan	Board Member	Ogdensburg Land Bank
Matt Owen	GIS Coordinator	Development Authority of North Country
Michelle Durham	Executive Director	North Country Housing Council
John Mikolay	Director of Operations – St. Lawrence County	Transitional Living Services of Northern New York
William Nelson	Director of Facilities Management	Claxton-Hepburn Medical Center (and former City of Ogdensburg Mayor)

APPENDIX B. SAMPLE PROBLEM PROPERTY TYPES

*Based on Community Progress' site visit observations, stakeholders may consider the using the following terms and definitions to help better identify, prioritize, and address the various types of problem properties facing the City and its residents.**

Substandard Property – any type of property, occupied or unoccupied, which fails to meet minimum housing standards established in state or local law and which may pose a risk to the health or well-being of occupants or neighbors.

Substandard Rental Property – occupied rental property which fails to meet minimum local housing standards and/or is in violation of local rental regulations, like certificate of occupancy requirements.

Vacant Lot – property with no structural improvements on the land.

Vacant Property – property with a structure or building that is unoccupied; may or may not be substandard or otherwise imposing harm on the neighborhood.

Abandoned Property – property with a structure or building that is unoccupied and the owner has walked-away from the property; usually also substandard and/or tax delinquent, and places a high demand on city services.

Zombie Property – vacant and abandoned residential property (1-4 units) where a valid mortgage lien exists against the property; note the NY Real Property and Proceedings Law § 1309 provides additional requirements for what qualifies as “Zombie Property.”

Heirs Property – property where the owner has died, usually without a will, and ownership has passed to one or more heirs who may or may not be in possession of the property. Heirs property may also be vacant or abandoned property.

Condemned Property – property that is unsafe or unfit for human habitation due to conditions such as lack of water, extensive mold, or other structural/systems issues that compromise health and safety; determined by Code Enforcement, subject to a hearing and appeal.

Brownfield Property – vacant or abandoned property or a vacant lot where the reuse of the property may be complicated by the potential existence of some type of environmental contaminant; often has multiple-years of tax delinquency and a legacy of industrial uses; the term “brownfield site” is defined in the NY Environmental Conservation Law § 27-1405.

** The definitions provided herein are intended solely as an informal tool to help local officials identify and prioritize problem properties. These definitions are not intended to reflect or summarize any similar terms defined in NYS or local law.*

APPENDIX C. AN EQUITABLE, EFFICIENT, AND EFFECTIVE TAX ENFORCEMENT SYSTEM

The following is excerpted from a 2017 Community Progress Report, *Aligning the Tools: Addressing Vacant, Abandoned, and Deteriorated Properties in Tennessee*, authored by Frank Alexander (https://www.communityprogress.net/filebin/Memphis_TASP_Report_September_2017.pdf)

An equitable enforcement system is one that is premised on a fair assessment system and which incorporates provisions for “hardship” repayment plans for targeted property owners such as low-income owner-occupants.

An efficient enforcement statute is one that is clear on the legal priority of the public obligations, the dollar amount, if any, of the obligation or lien, and the timeframes for compliance.

An effective enforcement statute is one that yields maximum compliance prior to deterioration and abandonment, and which culminates, in the event of noncompliance, in a transfer of insurable and marketable title to a new responsible owner.

APPENDIX D. TAX LIEN SALE SUMMARY, 2016 - 2018

This summary was prepared by the City Finance Director, upon request by Center for Community Progress, in order to better understand the trends of the annual tax lien sale as well as the potential financial implications of alternative approaches to the enforcement of delinquent property taxes.

Tax Sale Comparison	Year 2018 Tax Sale for unpaid 2017 taxes		Year 2017 Tax Sale for unpaid 2016 taxes		Year 2016 Tax Sale for unpaid 2015 taxes	
	# Properties	\$ Amount	# Properties	\$ Amount	# Properties	\$ Amount
Unpaid taxes on day of the sale	<u>273</u>	<u>711,068.69</u>	<u>286</u>	<u>670,865.59</u>	<u>273</u>	<u>733,746.05</u>
Withheld from sale:						
Bankruptcies	2	4,102.79	3	47,437.98	3	7,940.24
City Owned	36	43,417.00	29	17,250.11	26	186,749.14
City Interest	<u>6</u>	<u>69,699.26</u>	<u>17</u>	<u>42,452.97</u>	<u>17</u>	<u>52,898.11</u>
Total withheld from sale	44	117,219.05	49	107,141.06	46	247,587.49
Offered at lien sale	<u>229</u>	<u>593,849.64</u>	<u>237</u>	<u>563,724.53</u>	<u>227</u>	<u>486,158.56</u>
Paid by bidders (see detail)	108	375,858.77	145	420,318.50	163	415,373.35
Default bid by City	<u>121</u>	<u>217,990.87</u>	<u>92</u>	<u>143,406.03</u>	<u>64</u>	<u>70,785.21</u>
Summary						
Taxes paid at Sale	108	375,858.77	145	420,318.50	163	415,373.35
Taxes unpaid at conclusion of Sale	<u>165</u>	<u>335,209.92</u>	<u>141</u>	<u>250,547.09</u>	<u>110</u>	<u>318,372.70</u>
	<u>273</u>	<u>711,068.69</u>	<u>286</u>	<u>670,865.59</u>	<u>273</u>	<u>733,746.05</u>