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POLICY ISSUES BRIEF

The following policy briefing was authored by the Fair Development Roundtable, Community Development Network, Baltimore Transit Equity Coalition, and Baltimore Renters United

Fair Development -- Introduction

In the past, development policies embraced and supported racism that produced a Baltimore City separate and unequal to its suburban jurisdictions. Fair Development, on the other hand, seeks to meet our fundamental needs for housing, health care, work with dignity, and a sustainable environment, thereby advancing dignity for all Baltimore residents with the following principles: **EQUITY** (enable equality of outcome in meeting human needs, thereby prioritizing populations and communities with the greatest need and those of color); **UNIVERSALITY** (increase all City residents' ability to access the resources required to meet their fundamental human needs); **PARTICIPATION** (active engagement of city residents and support their decisions); **TRANSPARENCY** (open re: information and decision-making; and **ACCOUNTABILITY** (holding government and private actors accountable for failing to meet human rights standards).

More information about the Fair Development Roundtable's Issues Briefing can be found on our website: www.fairdevelopmentroundtable.org

Fair Development — Zero Waste

Consistent with the City's history, the toxic harm of development waste has been borne in a separate and unequal way. South Baltimore was annexed by the City in 1917 primarily for industrial use and waste, and 80% of the city's waste is burned in South Baltimore at the BRESKO trash incinerator. The cumulative impact, according to the Chesapeake Bay Foundation, is \$55 million annually in health care costs for the surrounding neighborhoods.ⁱ When trash is not being burned and polluting the air, an estimated 10,000 tons of it are dumped illegally in alleys and on vacant land. Poor, Black communities also bear the brunt of this, as indicated in a 2018 City Department of Public Works report on illegal dumping.ⁱⁱ The solution to these challenges is Zero Waste: The conservation of all resources by means of responsible production, consumption, reuse, and recovery of all products, packaging, and materials, without burning them, and without discharges to land, water, or air that threaten the environment or human health.ⁱⁱⁱ Fair Development requires that the City fully embrace the Zero Waste Plan created by City residents and organizers. This includes:

- Ending the City's contractual relationship with the Wheelabrator (BRESKO) incinerator when its contract expires in 2021;
- Expanding the City's waste collections to include curbside composting and universal recycling;
- Public investments in Zero Waste infrastructure, including a city composting and materials recovery facility;

- Instituting a zero-tolerance illegal dumping program coordinated with law enforcement, community associations, and the Departments of Public Works, Housing & Community Development, and the Office of Sustainability;
- Mandatory waste diversion for commercial food;
- Mandatory debris diversion for construction and demolition.

The complete Zero Waste Plan can be found at:

<https://drive.google.com/file/d/1wjWjYTsUVEjt4HiZRtorTmrZB-7V6fE7/view>

Fair Development – Affordable Housing

In 2018, the City signed a historic agreement with the Community Development Network and Fair Development Roundtable that promised to provide \$20 million/year to the City’s Affordable Housing Trust Fund (AHTF) without decreasing funding to other affordable housing and community development projects. Yet, only 2 years later, City revenue estimates indicate the surtax on high-priced property sales will not generate the \$13 million annually that was expected for the AHTF that is part of the \$20 million/year.^{iv} Further, the City is planning to cut funding to other affordable housing programs in the capital budget and has proposed a 40% decrease in Baltimore City’s DHCD capital budget for FY 2021.^v

At the same time, housing speculation is alive and well. In 2016-17, only one-third of all property transactions in Baltimore City involved owner-occupied property.^{vi} Most sales were business-to-business transactions, completed by LLCs, Real Estate Investment Trusts (REITs), Statutory Trusts, and other investment vessels. This type of speculation drives up property values, which can benefit some (homeowners) but harm others (renters, homeless, those on fixed incomes). Fair Development demands that the City

1. Fully fund the Affordable Housing Trust Fund with at least \$20 million/year without cutting additional housing and community development funds by extending the transfer/recordation surtax to all real estate transactions or through some other additional tax or funding source.
2. Divest the City pension money from speculative real estate transactions.
3. Provide community organizations interested in buying property (and providing affordable housing) and tenants interested in buying their own apartment buildings, rights of “first refusal” when residential property goes up for sale.
4. Transfer its own vacant properties and prioritize the transfer of privately-owned vacants at nominal fees to Black-led community-driven organizations that are willing to use their land for gardens, farms, recreation, housing, commercial business, or activities of environmental regeneration.^{vii}

Fair Development Platform-Public Budgeting

The City’s “Executive Budgeting” process means the Mayor proposes the budget and the City Council has the power only to cut it. Major decisions about the contours of the budget already have been made by the time of public hearings, which give the veneer of public input but no opportunity for meaningful participation. The City also forgoes almost \$100 million annually

through tax breaks and tax expenditures based upon political influence, not need.^{viii} Additionally, 15 anchor institutions currently have a ten-year agreement where they provide \$6 million in annual payments in lieu of taxes (PILOTs). This amounts to just 5% of what they would have paid annually as for-profit corporations. Increasing anchor PILOT contributions to 25% of for-profit payments would net the city roughly \$24 million annually. Tax Increment Financing (TIF) is another inequitable budget tool used for those with political influence. Under Fair Development, City Budgeting would centralize human dignity and

- Allow the City Council to *add to the budget* proposed by the Mayor in a manner that keeps the expenditures balanced with revenue;
- Create more meaningful public input opportunities in the budget process;
- Reassess PILOTs, TIFs and other tax breaks to meet fair development principles.

Fair Development —Work with Dignity

In Baltimore, the Black unemployment rate is more than triple that of whites.^{ix} The City's power here is the \$2.9 billion it spends annually. All city contracts should mandate city hiring to the extent that at least 25% of all work hours go to city residents and create worker-driven accountability structures. Further, Baltimore should embrace the worker co-op model by creating a preference for co-ops in city contracts and create a loan fund to help existing businesses to convert to the co-op model.

Fair Development Platform—Bank Lending & Redlining 2.0

The history of banks & governments marking maps with redlines to identify Black neighborhoods and use them as a guide to direct capital elsewhere is well documented.^x State and local governments must create new tools, alter the current dynamics of exclusionary lending, and move toward democratizing finance. “Public banking” is one such tool. A recent report by the Abell Foundation examined case studies of state/local public banks and the role they could play in addition to Community Development Financing Institutions (CDFIs) that already try to fill the gap of financial exclusion.^{xi} The report recommends that the city conduct a feasibility study of public banking.^{xii} The City should support a feasibility study on creating a Baltimore City public bank and identify other policies to address the financial exclusion of Black neighborhoods, businesses and households.

Addressing Vacant Property

The official number of vacant properties in Baltimore is approximately 16,000. The unofficial number is much higher. In the [Blueprint for Baltimore](#) survey conducted by the Open Society Institute, the three highest priorities for residents are safer streets, less trash, and fewer vacant homes. Despite the urgency of the problem, Baltimore City agencies do not have an accurate estimate of the costs that vacant properties inflict on the City, or of the potential cash flow if more vacants became occupied homes.

The Community Development Network (CDN) has made a rough estimate that the *direct cost of vacant properties* is \$36.3 million. In addition, we estimate the *total annual tax loss for vacant properties, plus nearby properties*, to be \$36.3 million. (It is purely a coincidence that the estimated totals for direct costs and tax losses are the same.) According to our rough estimate,

vacant properties are costing Baltimore City at least \$72.6 million a year. The next Mayor should encourage relevant City agencies to (1) generate an accurate accounting of the costs of vacant properties, and (2) explore CDN's estimate that turning around 4000 vacant properties would generate tax revenue and cost reductions of at least \$100 million. These funds could support ongoing investment in vacant house rehabilitation.

We have thoroughly researched policy changes to turn 500 more vacant properties into occupied homes, in support of community-vetted development projects, per year. Baltimore City DHCD has done pioneering work in addressing vacants, but the City needs more tools and partners to make a bigger dent in the problem. For promising policies to gain traction requires strong Mayoral leadership and a willingness of the Comptroller's office to try new approaches. The next Mayor should advocate for the following:

1. Allow for sale of tax sale certificates of vacant properties for less than the current minimum price to support community-vetted development projects where there are willing & able partners by:
 - Developing a process for valuing certificates that uses appraisals and pro-forma development cost estimates. Make sure that this process is transparent.
 - Promoting active DHCD use of tax sale in rem tool, starting in 2020, and selling properties at prices that promote community development goals.
2. Do not allow demolition by DHCD and/or Project CORE that lacks strategy and capacity for community-oriented redevelopment. Such demolition creates blight and contributes to chronic stress for residents. Focus more resources on stabilization of aging properties for future redevelopment.

Connecting Community Health and Development

We all know that unsafe neighborhood conditions and poor housing have a negative impact on the physical and mental health of Baltimore residents, especially those living in communities that have suffered decades of racial segregation and disinvestment. Health institutions around the country are stepping up to work with community partners to address the conditions outside of hospital walls that have a huge impact on residents' health.

For example, in Toledo, Ohio, the health institution ProMedica and the national community development intermediary LISC have launched a [\\$45 million joint effort improve community conditions and health outcomes](#). In Philadelphia, a public/private coalition created the [Healthy Rowhouse Project](#) to improve the health of rowhouse residents *and* preserve critically needed affordable housing.

Baltimore hospitals and community partners are also undertaking joint efforts to improve their communities, but City government, health institutions and nonprofit partners lack a coordinated approach. The next Mayor has a tremendous opportunity to align and accelerate the work of Baltimore hospitals in disinvested neighborhoods. We have the data. Collaborative studies such as the [Baltimore City Health Department's Community Health Assessment](#) aggregate the many daunting health challenges that Baltimore residents face.

We need action. The primary service areas of hospitals in Baltimore overlap. We know that improving vacant lots and rehabilitating vacant properties would have a huge impact on the mental as well as the physical health of neighborhood residents – but how can the City, hospitals and community-based organizations work together to address vacant properties and lots in a way that matches the scale of the problem? Baltimore City Health, Housing & Community Development and Planning Departments could bring hospitals, community development intermediaries and CBOs together to aggregate the information on community health needs AND provide input on solutions. Intermediaries like CDN could coordinate feedback from CBOs, so that hospitals and community partners can develop more cohesive strategies to improve neighborhood and housing conditions.

With bold leadership, forging strong connections between community development and health institutions could generate large-scale solutions to large-scale problems.

Evictions, Equity and Right to Counsel

Baltimore City faces a wave of likely eviction actions due to COVID-19, and it is far from ready. City, state and federal funding should immediately go to emergency rental assistance, increased access to legal representation for tenants, and investments in permanently affordable housing. If Baltimore does rise to this unprecedented challenge, it cannot and should not return to the old normal: 6,500 families evicted each year and the resulting impact on public health, racial justice, economic output, and childhood education. Baltimore and Maryland must treat housing as a human right, including a right to counsel in eviction cases. The City has 125,000 renter households but almost 140,000 eviction case filings resulting in about 6,500 evictions annually even before COVID-19. Baltimore's eviction rate of about 5.6% is almost 2.5 times the national average. Ninety-six percent of landlords are represented in eviction cases, while only 1% of tenants are represented. A right to counsel for tenants in evictions cases is a proven, cost-effective means of reducing the disruptive displacement caused by eviction actions. A newly published report from Stout Risius and Ross concludes:

A forthcoming report from Stout Risius and Ross concludes:

- An annual investment of \$5.7 million in a right to counsel for Baltimore tenants facing eviction would yield \$35.6 million in benefits or costs avoided to the City and State including:
 - \$10.6 million related to homeless shelters, transitional housing, and mental/physical health institution housing costs;
 - \$12.5 million in Medicaid savings related to emergency room and in-patient care;
 - \$2.3 million related to lost state funding to City Schools due to the chronic absence of students experiencing homelessness;
 - \$2.4 million in transportation costs avoided related to students experiencing homelessness in City Schools; and
 - \$7.7 million in foster care costs related to children placed in foster care because of disruptive displacement.

- Right to Counsel would assist 5,777 renter households (17,300 people) who have incomes less than 50% of the Maryland median income in avoiding eviction and disruptive displacement.
- Evictions are not only a symptom of poverty but a cause of poverty. Evictions cause job loss, homelessness, declining credit, deteriorating health, poor education outcomes, and contribute to children entering into foster care. Evictions lead to poor credit scores, loss of personal and financial assets and the disruption from local support systems (e.g., family networks, child care). This avalanche of consequences from an eviction often prevents tenants from achieving economic stability.
- Right to Counsel helps level the playing field and ensures families are treated with greater dignity and respect as they confront eviction. In Baltimore, landlords are represented in 96% of cases, while tenants are represented in 1% of cases.
- Stout estimates that 92% of represented tenants would avoid disruptive displacement with a right to counsel in Baltimore City. Representation in evictions is effective in stopping the disruptive displacement of tenants that often results in homelessness.
- Right to Counsel has proven effective in other jurisdictions. New York City began a phased implementation of a right to counsel in evictions in 2018. Evictions have since dropped 29% in zip codes where the right to counsel has been implemented. 29% is nearly double the rate of comparable zip codes without right to counsel. In right to counsel zip codes tenants remained in their homes in 84% of represented cases. Right to Counsel is being implemented in other jurisdictions including Philadelphia, San Francisco, Cleveland, and Newark, and is being considered in numerous others.

Evictions Perpetuate Racial Segregation, Disinvestment, and Displacement in Baltimore Neighborhoods. Housing instability and segregation in Baltimore are rooted in the long history of structural racism and dysfunctional capitalism. Timothy Thomas, PhD, of the University of California's Urban Displacement Project has released compelling data showing that evictions in Baltimore City have a disparate impact on Black males as well as female heads of household. This disparate impact exacerbates segregation and contributes to ongoing disinvestment in some minority neighborhoods while enabling and accelerating displacement and gentrification in others. Dr. Thomas's research shows:

- Women are evicted 47% more than men
- Black males are evicted at a 50% higher rate than white males
- Racially disparate eviction rates contribute to ongoing disinvestment in some redlined, segregated neighborhoods -- while at the same time evictions accelerate displacement and gentrification in others.

Substandard Housing Conditions

Baltimore should learn from other jurisdictions and take additional actions to address substandard housing conditions. For instance, with respect to mold, D.C. has a bill pending that would recognize mold as a violation of the building code, enable city inspectors to test for both visible as well as airborne mold, empower city inspectors to cite landlords for mold, and create standards for remediation.^{xiii} Tenants should be relocated when mold remediation must occur and health professionals should be empowered to identify and report mold-related health issues.

Baltimore should also close certain loopholes in its licensing law. For example, the Public Justice Center has documented numerous instances in which the landlord passed a rental housing licensing inspection by a private inspector – yet there were still numerous threats to life, health, and safety on the property. This is likely because current law allows the landlord to choose any inspector he wants. This creates an inherent conflict of interest for inspectors who may not conduct a rigorous inspection when they are paid by the landlord and want to be retained for additional business. The City can easily address this conflict by requiring the landlord to accept from an inspector assigned at random by the City. The City should also guarantee rental relocation assistance to any tenant who is displaced by the City revoking a rental license.

Requiring a landlord to show “just cause” before non-renewing a renter’s lease and also limiting the amount that the rent can be increased in a given year are additional policies that support housing stability and encourage renters to report unsafe housing conditions. Without these protections, renters are often subject to a retaliatory eviction.^{xiv}

Transportation Equity

Baltimore will choose a Mayor in November of 2020 who will come to office during the ravages of the one of the most aggressive viral contagions encountered by our species in over one hundred years.

One set of tasks must be discharged immediately. That task, the economic and community development vision and goals for Baltimore, requires the next Mayor to assemble a trust of planners, developers, consultants, community leadership, and local governmental officials.

The first question to the Mayor and the trust is “Will Baltimore be a ‘sprawl’ city or what we call a ‘gathered’ city?” If we answer “No!” to sprawl, we will have abandoned an identifying mark of Baltimore’s segregationist history. Sprawl is developer shorthand for “leave Baltimore,” “Catonsville is close enough” or “Let *them* all live in Upton.”

Racism and the unsustainability it has generated in Baltimore’s historical development and currently anemic economic performance have led to the failure of planners and developers to acknowledge the role of public transportation as a “force multiplier.”

The briefing notes that follow are intended to offer perspectives for Baltimore city planning for our next Mayor, the new head of the household. When transportation is included in all city

development planning, the unacknowledged force-multiplier can finally be activated. More importantly, we will have wed land use and transportation planning.

1. Force Multiplier. Transportation is the most important intersectional connector in a resilient society. Its presence adds value to any activity or location it serves. Transportation is a “force multiplier.” Affordable housing, education, employment, healthcare, food security are activities or locations to which transportation adds value. Success in planning and development can be measured by the impact of transportation assets on the projects or destination.

The next mayor must become familiar with this mantra: Any activity outside of the home requires a transportation plan and transportation permits any activity or location to increase its value to the society.

2. Locality Contribution. Each locality in the urban setting has a value. What does it contribute to the walkability, livability, navigability, employability, of the community? The development of a “Locality Contribution Index” to measure the contribution of an activity or location to the economy can help the next Mayor understand what activities, programs, or new construction need improved transportation connectivity.

3. Transportation Disadvantaged (TDA). Current urban development and transportation models in Baltimore have not adequately addressed unsustainable urban transportation problems that transportation disadvantaged (TDA) groups overwhelmingly encounter, and the negative impacts on the disadvantaged have not been effectively considered. The next Mayor in Baltimore must break with tradition and study the characteristics of the transportation disadvantaged. At thirty percent of the city’s population, they constitute a demographic and economic X-factor whose dimensions are unknown. Nevertheless, the TDA have shown that public transportation will remain essential post-pandemic as long as it transports the essential worker.

“Transit-detention” refers to the lengthy commutes characterizing transportation in Baltimore where two of three commuters travel 90-minutes or more one-way daily. Lengthy commutes are a signal that the city has not directed the transportation system administrators to improve the commuters’ and employers’ optimum contribution to the economy. “Transit-dismissal” follows tardiness. When coupled with transit-detention, the economy loses over \$375 million per annum – the cost of ignoring the transportation-disadvantaged.

4. Transit Equity Analysis. Neither the state nor the city knows the dimensions and characteristics of the TDA population. Who among them are employed, but greatly disadvantaged by distance of commute, cost, lack of access, and commute time? Transportation disadvantaged is a multi-dimensional problem that combines demographic, spatial and transportation service dimensions.

The society itself has internalized the operation of normalized racism and reacts much too slowly when shown its destructive power. Racism has proven to be the greatest suppressor of investments in public transportation. The next Mayor of Baltimore must address this matter directly if Baltimore is to experience a return to national prominence as a leading city with an equitable, multi-modal, reliable, connecting transportation system.

5. Access to Destination. A bus stop at the front door does not mean that the transit-rider gets to within one-mile of the workplace. More important to the next Mayor than access to transportation is access to destination.

Baltimore has a special historical obligation. The cancellation of the Red Line light rail project pushed Baltimore into the vanguard of cities that have had to fight open, vicious racism in order to persuade its residents that approval of light rail would send a message that racism can be fought, but more importantly, that racism can be defeated.

6. Density. Density is the most studied land-use characteristic helping to explain numerous travel behaviors. Higher densities:

- a. Increase the range of opportunities for the development of local personal contacts and activities that can be maintained without resort to motorized travel.
- b. Broaden the range of local services thus reduce the need of travel and length of travel
- c. Reduce travel distance between homes, services, employment, and other opportunities.
- d. Provides substantial number of passengers for public transportation services and fewer riders are amenable to private motor vehicle usage.

Baltimore must decide what its identity will be.

7. Affordable Housing. How many households in Baltimore are already threatened with the loss of housing due to increases in rental costs? What are their characteristics? How will you determine the cost of affordable housing that Baltimore already needs for those communities most vulnerable to high rental expenditures? If Baltimore is to become more effectively dense, we must locate well-developed activity and job centers within the city and affordable housing must be constructed and preserved in order that the city achieves mixed income, mixed use, and sustainable, livability goals across a broader sweep of the city.

8. Development along a rail corridor has two major impacts. Over the last four decades, light rail has been the single most robust generator of massive community and commercial economic development across the nation. In the 2018 General Elections voters approved over \$41 billion in new taxes for transportation dominated by light rail projects.

Major infrastructure projects will a) attract major and transformative economic development bringing economic entities closer to patrons via light rail for example. Because these locations are fixed, a development curve is also initiated in which over time increasing numbers of developers and entrepreneurs will b) locate along the corridor and at or near transit hubs. However, opportunities for construction and preservation of transit-oriented-affordable housing includes housing built specifically to take advantage of the “urbanizing” power of light rail.

There is a scale effect at play as large infrastructure projects tend to precede and trigger land use changes while small scale transportation projects tend to complement the existing land use pattern. The Purple Line in Montgomery and Prince George’s Counties has attracted \$12 billion in projects. Scale of the project dictates the scale of the economic impact. Hence, development follows rail, buses follow development.

9. What Baltimore Needs in Transportation. More than mobility, Baltimore needs the massive community-stabilization and commercial economic growth that accompanies rail construction. Movement from point A to point B is only one element of the solution. The difference between Baltimore and Washington, DC is Metro. Affordable housing and equitable transportation anchored by light rail comprise the combination upon which a resilient Baltimore can be built.

10. The Regional Transportation Authority (RTA) and Regional Transportation Plan (RTP). Transportation is lived and experienced at the regional level, the proper locus of transportation decisions. An RTA is empowered to plan, design, build, operate, maintain, administer, and finance a regional transportation system. The RTP does not envision the type of land-use and transportation planning required for Baltimore to recover from the accelerated economic decline consequent to the cancellation of the Red Line light rail project. There are no projects in the RTP that will provide 10,000 jobs, dramatically reduced commute times, and over \$6.5 billion in transit-oriented-development that were part of the Red Line plan. Rather, the RTP demonstrates why the MDOT MTA model is inappropriate for our region. It proposes no solutions to Baltimore's most pressing land-use and transportation challenges.

ⁱ Thurston, *WRITTEN REPORT OF GEORGE D. THURSTON REGARDING THE PUBLIC HEALTH IMPACTS OF AIR EMISSIONS FROM THE WHEELABRATOR FACILITY* (Nov. 20, 2017), Chesapeake Bay Foundation, accessed Feb. 13, 2020, <https://www.cbf.org/document-library/cbf-reports/thurston-wheelabrator-health-impacts-2017.pdf>

ⁱⁱ Baltimore City Dept. of Public Works, *Annual Report on Actions Taken to Remediate Illegal Dumping in Baltimore City, FY 2018* (Dec. 2018) accessed Feb. 13, 2020, <https://publicworks.baltimorecity.gov/sites/default/files/Illegal%20Dumping%20Remediation%20Report%20FY2018.pdf>

ⁱⁱⁱ Zero Waste International Alliance, *Zero Waste Definition*, last accessed Feb. 13, 2020, <http://zwia.org/zero-waste-definition/>

^{iv} Affordable Housing Trust Fund Commission, August 27 2019 Commission Mtg. Transcript at 30-31, <https://dhcd.baltimorecity.gov/sites/default/files/Meeting%20Transcript-August%202019.pdf>

^v Compare City of Baltimore - Fund Summary: Agencies by Fiscal Year FY 2021 (proposing \$42,067,000 for DHCD in capital budget) <https://planning.baltimorecity.gov/sites/default/files/FY21-26%20Agency%20Fund%20Summary%20by%20Fiscal%20Year.pdf> with City of Baltimore - Fund Summary: Agencies by Fiscal Year, FY 2020 (allocating \$57,028,000 to DHCD in capital budget) <https://planning.baltimorecity.gov/sites/default/files/FY20-25%20Agency%20Fund%20Summary.pdf>

^{vi} Maryland Center on Economic Policy, *Revenue Options for Baltimore City's Affordable Housing Trust Fund*, p.3 (April 2018), accessed Feb. 14, 2020, <http://www.mdeconomy.org/wp-content/uploads/2018/04/MDCEP-Housing-Revenue-Policy-Brief-1.pdf>

^{vii} Franke, *Repair: Redeeming the Promise of Abolition* (Spring 2019, Haymarket Books). Perhaps the best way to deliver reparations today, Franke writes, would be “through creative new forms of collective land ownership in which property is placed in trust for a community, removing it from the speculative market and place it in the hands of community-controlled non-profits.”

^{viii} City of Baltimore and Mayor Stephanie Rawlings-Blake, “Fiscal 2015 Summary of the Adopted Budget,” 109.

^{ix} Andre Petty, *Black workers are being left behind by full employment* (June 26, 2019), Brookings.

^x Rothstein, *The Color of Law: A Forgotten History of How Our Government Segregated America*, (May 2017, Liveright); and Pietilla, *Not in My Neighborhood: How Bigotry Shaped a Great American City* (2010, Dee).

^{xi} The Abell Report, July 2019, Vol. 32, No. 6, Sean Vanatta, *The Municipal Banking Movement: An Opportunity for Baltimore*.

^{xii} *Id.*

^{xiii} Meena Morar, ggwash.org, Some DC tenants need to sue to get redress for mold. A new bill could change that (Dec. 6, 2019) <https://ggwash.org/view/74983/dc-tenants-need-to-sue-to-get-redress-for-mold-a-new-bill-could-change-that>

^{xiv} Policylink.org, Just Cause Eviction Controls - Equitable Development Toolkit (Mar. 2002) <https://www.policylink.org/resources-tools/just-cause-eviction-controls>