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The Honorable Jacob Day

Secretary, Maryland Department of Housing and Community Development

Chair, Baltimore Vacants Reinvestment Council

Sent via email

RE: Furthering Discussions Regarding the Baltimore Vacants Reinvestment Council (BVRC) 12th Letter

Secretary Day, Commissioner Kennedy, and Members of the BVRC:

Thank you for the opportunity to send my thoughts to the BVRC. In this letter, I provide a brief update on In Rem, and my thoughts on the coordination of community development efforts across the city.

In Rem follow up

Since my last letter, the Housing and Economic Development Committee of the City Council held a hearing regarding In Rem, and my bill to add In Rem 2 as a tool. Below are some highlights from each of the hearings.

In Rem Oversight hearing: The slides and documents from the hearing can be found [here](#). This graphic is directly from the slides from the hearing, which took place on October 21, 2025. It shows the status of In Rem cases:

In Rem

Identified Targets – 707
Ordered Title Work – 520
Assigned for Filing – 158
Filed (No Judgment) – 304
Post Judgment Phase – 264
Judgments– 569

Total Eligible Properties
(VBNs and Vacant Lots) Not
Yet Targeted: 5,412

Baltimore City DHCD then reported at the hearing that their current capacity to file In Rem cases is 6-8 per filing attorney. They currently have 13 lawyers and are working to hire another. In doing the math, it is clear that **in order to reach the first goal of filing 200 In Rem cases per month, they need 25 lawyers with the corresponding paralegals and title attorneys.** Conversations with Law Firms across the city need to start to help us build capacity if our budget cannot sustain hiring an additional 11 more lawyers and corresponding support. With over 5,412 properties eligible for In Rem (my estimates from my last letter seem to be higher), the need to increase capacity at the city level is huge.

In Rem 2, The 25-0080 hearing: Baltimore City DHCD came to the hearing opposing In Rem 2. Their bill report outlines their worry about including “nuisance” properties which I discuss in my testimony. In addition, DHCD testified that they believe we have the tools to address vacant and abandoned properties where the liens are below the assessed value of the property, such as condemnation and receivership. While that is true, there are drawbacks to each. For instance, receivership requires a public auction to the highest bidder, taking away the opportunity to be strategic about the outcome of the property. In Rem 2 has the promise of being faster and allowing for strategic disposition. The Law Department suggested several amendments to ensure In Rem 2 actions are not considered takings. DHCD suggested that their opposition would be minimized with the Law Department’s

amendments, which I will be integrating into my bill. You can find my testimony and the documents for this hearing [here](#) and I look forward to passage of this important legislation.

Circuit Court Update: The Circuit Court has received the additional funding allocated during the budget negotiations from Baltimore City and is in the process of hiring the two positions requested. According to the current Magistrate, this will allow the courts to have the capacity to reach 200 cases filed per month. The State's funding is in place, and a further update is forthcoming.

Working toward a strategic vision

There is a substantial focus on housing and community development, more so than I've ever seen in my three-decade career in the field here in our great city. Let us not forget how we got here. Even though our racist housing policies of the past were declared unconstitutional, city government and relevant development stakeholders continued to ignore areas of the city for decades. That cost our city dearly, including rising crime rates, rising health disparities, a substantial decline in population, and the loss of three firefighters who died when a vacant building on fire collapsed. Their sacrifice is what brought about the calls for reforms, although many of us had been calling for them for several years. Lt. Butrim, Lt. Sadler, and FF/EMT Lacayo's deaths cannot be in vain. We must get this right for our city - the city they loved so much and took pride in protecting - and for their families who have suffered tremendous loss.

This new effort at dismantling the impact of our racist housing policies and investing in areas that need it most is exciting. While I am a big fan of ensuring we have all the tools, the numerous efforts currently underway seem disjointed, uncoordinated, and only focus on bringing the vacant property numbers down. While that is the ultimate goal, it is important to consider ensuring mixed income communities as I've talked about before.

Below, I lay out some of these initiatives and propose a way forward. It has been on my mind for several months now but came to a head the other day in a meeting of the Tax Credit Working group.

In my second letter, I proposed [this](#) matrix of outcomes and indicators to measure, based on my experience as the founding director of the Baltimore Neighborhood Indicators Alliance (BNIA) and work in the field. I still believe these are what we should be tracking and have been working toward getting the data together. Ideally, there would be an entire public process to establish these outcomes, as we did when we started the Vital Signs over twenty years ago. The advantage of an indicator system, which looks at a set of outcomes and measures progress toward those outcomes, is that it will allow us to align our thinking around the strategies to achieve those outcomes. Below is a snapshot of the proposal I made, and I further define the data in **Appendix A**.

Overall Outcome: *Reduce vacant properties by 5,000 in 5 years and ultimately eliminate vacant properties in 15 years while growing our city and creating intentional mixed income communities through development without displacement.*

Measures that tell us we are getting there, neighborhood by neighborhood

- *Income and Racial Diversity index - the greater the number, the more diverse a community*
- *Vacant property threshold for each neighborhood at less than 4%*
- *Increase in the number of households*
- *Increased property tax revenues*

It is in that spirit of these outcome measures that I am listing here some of the larger efforts around community and economic development that I believe are disjointed. While several of these strategies may be considered puzzle pieces that, in time, will make up the entire puzzle, it does not seem like the pieces actually fit together.

Baltimore's Comprehensive Housing Plan: Many of us in the community development field called for a *Comprehensive Housing Plan* (known here as the Housing Plan) to accomplish the goal of creating our community development and housing vision, and the measures and strategies to get there. We were excited about the announcement on July 14, 2024 to create such a plan. The announcement outlined the purpose, outreach, and timelines. It also detailed the integration of the \$3 Billion plan to reduce vacant properties, the Community Development Framework that created the Impact Investment Areas, strategies for growing our population related to housing, housing targets, and more. The release can be found [here](#).

The rest of that summer and fall, DHCD engaged the community development sector and had several town hall meetings with residents and stakeholders. I was impressed with the outreach by DHCD and the consultant team to the community and stakeholders. The consultant group hired a subcontractor to assist with outreach to the Latine community, and I witnessed the critical engagement of our community. I had very high hopes for this Housing Plan.

It is now November of 2025, and the timelines for producing drafts, public comment, and plan production are not met. In addition, there is no draft on which to comment. **The City's Comprehensive Master Plan (known here as the Master Plan) highlights opportunities for investment, recommends land use policies, and emphasizes that policy and investment opportunities must be implemented in an equity framework.** The Master Plan does not outline policy or housing targets. The former Director of Planning acknowledged in the hearing about the Master Plan that actual outcomes and indicators related to housing, as well as housing targets, were not included because the Department of Planning was waiting on DHCD's Housing Plan.

Moreover, some parts of the Housing Plan draft that have been presented to specific audiences for feedback reflect a missed opportunity and, at times, a lack of knowledge about the work that other groups across the city are doing. For instance, the Tax Credit Working Group received a heads-up about ideas for some tax credits to attract certain groups outlined in the Housing Plan. The Tax Credit Working Group pushed back significantly on these tax credit recommendations that were going to be proposed in the Housing Plan and has forged ahead with their own work which is further outlined below.

Tax Credit Working Group: I am not an official member of this group, but I attend all the meetings, and I appreciate the group allowing me to fully participate in the discussions. The group is advising the Department of Finance and the Administration on changes to the city's suite of tax credits, including making them operationally easier to manage, determining their ultimate value for investment and growth in our city, and making changes to save City government funds. The group undertook a year of examination of the current credits based on the Department of Finance paper [here](#) from two years ago. The Working Group could not reach a consensus, and the Department of Finance has now contracted with a consulting group to assist with further analysis based on the goals set out. The consultant's proposal seeks to examine several types of neighborhoods and apply one baseline credit tool with some specific variations to boost investment. They also include housing targets in their proposal. This work is being done in isolation from the BVRC, and in fact, the consultants seemed surprised to hear about the BVRC and the work being done. I suggested to the Tax Credit Working Group that the work should be reflected and integrated into the Housing Plan as well, and vice versa.

Reframe Baltimore: Baltimore City DHCD has rebranded the vacants reduction work as Reframe Baltimore. Reframe Baltimore places all of the aspects of the work in one place - acquisition, disposition, developer registry, and developer incentives. This is a huge effort and I'm glad we are collectively moving in the right direction with the use of the suite of In Rem tools for acquisition. While it mentions the BVRC work and geographies, it is rarely referenced in the other documents or initiatives outlined in this letter. Reframe Baltimore is the nuts and bolts of the work, along with the dashboards showing progress along several data points.

BVRC Action Plan: The BVRC has become an important spark to push Baltimore City DHCD, City government, Greater Baltimore Committee, the community development field, and all of us to do better and perform. This has

been extremely valuable. The BVRC Action Plan goes a bit further. For this writing, I am using the first draft of the BVRC Action Plan that was circulated to the Delivery Chain working group on 10.24.2025. The BVRC Action Plan outlines strategies for helping to improve the internal City systems for the vacants reduction work and focuses on the Whole Blocks approach. It includes older adult home repair and strategies for ensuring all homes on the Whole Block receive attention. However, it is not clear on timelines and is very focused on the reduction of vacant and abandoned properties, not focused on the need for a strategic and intentional approach. The BVRC Action Plan also does not mention equitable development or even espouse the values of equity in the plan at all, which seems in direct contrast to the City's Master Plan. One could argue, however, that by the very nature of the communities that are targeted, the work is equitable development at its core. If that were the case, neighborhoods who are suffering the most like Carrollton Ridge would be added.

Council Bill 25-0066 - Housing Options and Opportunity Act: This bill, sponsored by the administration, is one of five bills that the City Council has considered related to land use and housing. This particular bill makes all conversions of single-family homes into multi-family by right, meaning no hearings, planning, or public comment are needed for the conversions to occur. The number of units allowed depends on the home's square footage. For instance, the square footage in R7 and R8 zoning areas would be 750 square feet per unit.

Maryland and Baltimore City have a housing crisis. We want to increase housing units exponentially in Baltimore City, but we need to do it in a comprehensive and intentional way. Simply subdividing homes is not strategic or intentional, and in my district, Black neighborhoods are more impacted than the White areas. Moreover, the covenant communities are not impacted at all. I have written extensively about these bills and you can find my thoughts [here](#). While I have serious concerns about the bill, I acknowledge there must be a solution to making the numbers work for rehabbing the largest homes in our city. But there cannot be a one-size-fits-all approach.

Should this pass as written, it is absolutely critical to know who is purchasing the homes and renovating them. Bad landlords - which we have - will renovate poorly and without permits, as we are already seeing. I am working with the Administration on a bill to strengthen the landlord licensing law which we need anyway.

The 10 Year Financial Plan draft: The 10 Year Financial Plan has also been in the works for over a year. While no draft has been formally circulated yet, conversations are happening formally and informally to assist our city in making key investments, ensuring stellar services while cutting costs, and working toward growing our population. **In the slide presentations that I have seen, addressing vacant and abandoned properties is last on the list of priorities outlined in the plan.** I have raised concerns about this everywhere I can, as making the investments and speeding up our work will yield growth in our population because residents who come here need a place to live. The 10 Year financial plan has to match the Master Plan, the Housing Plan, the tax credit working group reforms, and the vacants work.

Tying it all together: Focusing on our outcomes as I suggested at the outset, or something like what I proposed but established through a process, is important to align and coordinate efforts. I also suggest having someone whom all initiatives agree upon, to help coordinate efforts across the stakeholders toward the common vision. That person has to work through some of the challenges I have laid out, but in the end, such an effort will keep our city on track strategically and effectively.

Thank you again for the opportunity to provide my thoughts. I look forward to the discussion.

In partnership,



Odette Ramos, Baltimore City Councilwoman, 14th District

Appendix A.

Proposed Overall Outcome and Indicators, with data explanations.

Below is the set of outcomes and indicators I proposed in my 2nd letter to the BVRC. The entire matrix of outcome indicators and explanations of the data can be found here.

Overall Outcome: Reduce vacant properties by 5,000 in 5 years and ultimately eliminate vacant properties in 15 years while growing our city and creating intentional mixed income communities through development without displacement.

Measures that tell us we are getting there, neighborhood by neighborhood

- Income and Racial Diversity index - the greater the number, the more diverse a community
- Vacant property threshold for each neighborhood at less than 4%
- Increase in the number of households
- Increased property tax revenues

Explanation of the indicators and data sources:

Economic Diversity Index: The Economic Diversity Index is the chance that two people living in the same neighborhood earn two different incomes. The higher the number, the greater the economic diversity. The same can be done using the Racial Diversity Index. Using this metric will help track our goal of creating mixed income communities. **Sources and analysis:** This analysis uses Census data and can be re-evaluated using the American Community Survey. BNIA invented this indicator and can do it again.

Vacant Property Threshold: According to the Baltimore Neighborhood Indicators Alliance, if a neighborhood reaches less than 4% vacant properties out of all the properties in the neighborhood, the market generally takes over and the neighborhood is where we want them to be. If the vacant property threshold is between 4% and 7% of all of the properties in the neighborhood, the community is at a tipping point for going either way. If a neighborhood has more than 7% of its properties listed as vacant, more interventions are needed. Ultimately, the goal is to have neighborhoods with 4% or less vacant properties. This is a better indicator of success because we're not just looking at net vacancy reduction, we are looking at the outcomes for the neighborhood. **Sources and analysis:** DHCD has already organized the VBN data by neighborhood on the dashboard and measured the percentage per neighborhood. This is ready to go.

Increase number of households: Baltimore is already seeing trends of growth of households. Tracking households, rather than population, provides us with a better understanding of who is staying in Baltimore City and who is moving here. In addition, families do not have as many children as they once did. If we can see a consistent increase in households by neighborhood, this tells us about demand in each neighborhood and stability in our population. **Sources and analysis:** This is already tracked by the US Census and the Planning Dept tracks using a variety of analysis by neighborhood.

Increase in diverse housing units produced: By tracking the increase in housing units, we are not just looking at reduced vacancy, but also looking to meet the housing goals for the state. The housing units produced should be outlined based on units for various incomes and whether they are single family or multi-family. A steadily increasing number of units in every neighborhood articulates the success of our vacant property elimination strategy and creating diverse communities. A mix of housing styles is just as important as the net increase in units. The same can be measured for commercial outcomes as well. **Sources and analysis:** Examination of Use and Occupancy permits issued.