YIMBY LAW

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Philadelphia's Land Bank & Unlawful Discretion

Philadelphia's ordinances limit the Land Bank's authority, so why does the Land Bank often exceed that authority by denying housing projects?

By Jack Farrell, Research Attorney, YIMBY Law

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Who is YIMBY Law?

YIMBY Law is the legal arm of the pro-housing movement and is housed in YIMBY Action's 501c3 affiliate, Yes In My Back Yard.

YIMBY Law was established in 2019 to enforce housing law compliance, particularly the pro-housing laws recently fought for and won with YIMBY activism to address the housing shortage and affordability crisis.

Author Jack Farrell lives in Pennsylvania. He received his Juris Doctor from Temple University Beasley School of Law in 2017. He spent the 2017-2018 term clerking for Hon. John Rauh in Atlantic County, New Jersey's criminal division. For over 6 years he worked with Legal Aid of Southeastern Pennsylvania as a staff attorney specializing in civil legal needs for survivors of domestic violence, then later grants & compliance specialist.

Executive Summary

Philadelphia's ongoing crises of high poverty and rapidly rising housing costs are solvable, but the city's own processes stand in the way of important solutions. Needless delay and unmeasurable, inconsistent standards prevent progress, jeopardizing the city's economic future and the well-being of its residents. Mayor Parker's ambitious goal to create or remediate 30,000 homes is achievable, but it is being actively undermined by systemic dysfunction within the Philadelphia Land Bank. **This report from YIMBY Law identifies the core legal failure at the heart of the Land Bank's inefficiency: the unlawful injection of personal discretion by its Board into a process that, by city law, is meant to be objective and predictable.**

The Land Bank is a city body established with a mandate to convert blighted, city-owned properties into productive assets, but rather than fulfilling its duty, the body has become an obstacle to development. The Bank can only finalize property conversions after review by staff, approval by the Board, and finalization from the Philadelphia City Council. With over 5,300 lots eligible for development, the Land Bank has disposed of only 1,017 in over ten years. This lack of progress forces the city to continue costly maintenance of blighted properties while forgoing new tax revenue and housing units. The positive news is that there is an identifiable cause at the root of the Land Bank's dysfunction. Although the ordinances that established the Land Bank and granted it authority define clear, objective criteria to approve property conversions, the Board routinely acts on subjective and unpredictable requirements that are not mentioned in the law. The easiest, most effective reform comes from following the laws already in place.

This report explains how city ordinances for both competitive (e.g., Turn the Key) and non-competitive (e.g., Mixed-Use/51-49) proposals each give the Board firm direction on how they are to evaluate projects; nonetheless, the Board's reliance on unauthorized discretion stalls necessary progress and turns development into a dice roll. Denials based on subjective criteria create an unpredictable and costly process that delays construction,

wastes public and private resources, and stifles the very housing production the Bank was created to enable. Moreover, it drives potential developers away from the city to avoid the frustration and uncertainty created by the Land Bank's activities.

To align the Land Bank with its legal mandate and unlock Philadelphia's housing potential, YIMBY Law recommends:

- **Board Compliance**: The Land Bank Board must immediately cease applying subjective judgment and limit its reviews strictly to the legally defined criteria in city ordinances and disposition policies.
- **Batch Processing**: The Land Bank must shift from a lot-by-lot approval mindset to a city-wide growth strategy because combining reviews for multiple contiguous lots would accelerate the creation of dense, multifamily housing and generate a massive return for the city.
- **Adherence to Mandates**: City departments must conduct legally required annual performance reviews and renew the Land Bank's strategic plan to provide transparency and a coherent city-wide disposition strategy.

By following the law that already binds it, the Philadelphia Land Bank can transform from a bottleneck into a powerful engine for affordable housing, putting the city on a swift path to meeting its housing goals and building a more equitable and prosperous future.

Introduction

Philadelphia has an urgent, ongoing need for new housing. While the city is one of the poorest large cities in America,[1] it is also among the top 5 for fastest growing housing costs.[2] Mayor Parker plans to create or remediate 30,000 homes in her first term,[3] a goal that could be achievable and affordable if the city Land Bank Board followed the law and its own policies.

Philadelphia's Land Bank is tasked with selling city-owned land for development, converting blighted or vacant properties from drains on city resources to productive uses; nonetheless, the Land Bank's activities slow or stall city development potential.[4] Legally, its decisions are meant to be based on clear criteria by Land Bank staff or Board members. In fact, reviewing the laws and policies surrounding Land Bank decisions, as well as statements by its own staff, indicates **the Land Bank Board has NO DISCRETION to deny qualifying projects**. In practice, however, the Board routinely injects unlawful discretion into its decisions.[5] While Philadelphia land disposition does make room for local discretion, that latitude rests with democratically elected members of City Council, not appointed members of the Board. The results of this unlawful discretion are stagnation, wasted city dollars, and a process that confuses and slows the development it exists to support.

Philadelphia itself has put out a call for solutions, but the people and businesses trying to provide those solutions often experience frustration and confusion when they interact with

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[1] Lubrano, Alfred. *"Philadelphia Is Still America's Poorest Big City. What Will It Take to Change That?"* WHYY, 8 Feb. 2024, https://whyy.org/articles/philadelphia-americas-poorest-big-city-poverty/.
[2] Lubrano, Alfred. "*Philadelphia Ranks among Top 5 Cities for Hottest Housing Market in 2025, Zillow Says.*" 6abc, 10 Jan. 2025, https://6abc.com/post/philadelphia-ranks-among-top-5-cities-hottest-housing-market-2025-zillow-says/15777492/.
[3] Moselle, Aaron. "*Mayor Parker Launches Philly Initiative to Create and Preserve 30,000 Housing Units*." WHYY, 19 Feb. 2025, https://whyy.org/articles/philadelphia-mayor-cherelle-parker-housing-initiative/.
[4] Moselle, Aaron. "*'The System Needs to Be Blown Up': Critics Tell Lawmakers Philly's Land Bank Needs Change.*" WHYY, 30 Oct. 2024, https://whyy.org/articles/philadelphia-land-bank-changes/.
[5] Geeting, Jon. "*Want More Housing? Fix the Land Bank.*" *The Philadelphia Citizen*, 21 Mar. 2025, https://thephiladelphiacitizen.org/fix-land-bank/.

the city. As just one example, affordable housing developer Smith & Roller responded to a City RFP to create affordable units, working with Mount Vernon Manor CDC, People's Emergency Center, and Habitat for Humanity. Since 2019, that project has languished in back and forth confusion between different city agencies and contradictory instructions. Late in the process they were not only told to adjust the project's unit count but also that doing so would restart many of the processes that had already been a roadblock for years. Meanwhile, zoning approvals from PRA (Philadelphia Redevelopment Authority) were cancelled by L&I (Licenses and Inspections) without notice. Another hiccup that came late in the process – they were told that part of the underlying parcel was incorrectly listed as city-owned rather than privately owned. This forced the developer to redesign aspects of the proposal, adding yet more costs and time. Six years and hundreds of thousands of dollars have been spent on a project with chances of success that both its developers and city staff can't determine. Philadelphia's leaders have to do better if they want to see the city thrive.

As the Land Bank's unlawful decisions expend resources for city staff, affordable housing developers, and individuals seeking to follow Land Bank rules, it also worsens ongoing problems:

- Despite a $3.5 million budget for acquiring new parcels, the Land Bank is underutilizing the potential of those parcels to provide housing, green space, and supplement the city's tax base.[6]
- With over 5,300 lots eligible for development, the Bank had only disposed of 1,017 properties in over ten years.[7]

[6] Moselle, Aaron. "*Philly Tax Sales Resumed Nearly a Year Ago. The Land Bank Still Hasn't Bid on Any Properties.*" WHYY, 7 Mar. 2025, https://whyy.org/articles/philadelphia-land-bank-sheriff-sales-bidding/.
[7] Blumgart, Jake, *City Council grills Land Bank on selling only 1,017 vacant properties in over a decade*, Philadelphia Inquirer, 16 Apr. 2025, https://www.inquirer.com/real-estate/commercial/land-bank-philadelphia-parker-housing-20250416.html.

- While properties languish without disposition, the city has to pay to maintain and secure blighted properties. In 2010, the University of Pennsylvania's Institute for Urban Research found that maintenance of blight cost the city $20 million per year while depressing property values by $3.6 billion.[8]

- Oversight and direction are lacking. The Department of Planning and Development is legally required to submit annual performance reviews of its departments, but it has never done so for the Land Bank.[9] Meanwhile, the Land Bank is required to renew its strategic plan every 3 years, but it last did so in 2017.[10] And the Land Bank has been operating from a 2019 strategic plan approved by the Board but not ratified by City Council.

This status quo should not, and legally cannot, continue.

At the time of writing, Mayor Parker's administration and city offices are taking the task of reform seriously. Just days ago, Mayor Parker initiated staffing changes to the Land Bank Board which signal a genuine commitment to seeing blighted land put towards a productive public purpose.[11] YIMBY Law applauds the further commitment to a Land Bank Operational Assessment and an Operational and Programmatic Efficiency Assessment, which will conclude that efficiency is only achievable if the Board limits its reviews to legally appropriate criteria. Formalizing the process according to Philadelphia law would make for

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[8] Econsult Corporation, *Vacant Land Management in Philadelphia: The Costs of the Current System and the Benefits of Reform*, Penn Institute for Urban Research, Nov. 2010, https://penniur.upenn.edu/sites/default/files/2024-09/vacant-land-full-report.pdf.

[9] Blumgart, Jake, *City Council grills Land Bank on selling only 1,017 vacant properties in over a decade*, Philadelphia Inquirer, 16 Apr. 2025, https://www.inquirer.com/real-estate/commercial/land-bank-philadelphia-parker-housing-20250416.html.

[10] Deegan, Rebecca. "*Philadelphia Land Bank Is Paved With Good Intentions, but Progress Has Been Slow.*" Sierra Club Pennsylvania Chapter, 26 Nov. 2024, https://www.sierraclub.org/pennsylvania/blog/2024/11/philadelphia-land-bank-paved-good-intentions-progress-has-been-slow.

[11] Jake Blumgart, *Mayor Parker shakes up Land Bank board to try to further her housing plan*, Philadelphia Inquirer, 20 Oct. 2025, https://www.inquirer.com/real-estate/housing/philadelphia-land-bank-parker-30000-houses-20251020.html.

more predictable, efficient dispositions that reduce housing costs while saving resources for staff and developers.

A review of existing law and the Land Bank's potential prove that solving Philadelphia's housing affordability shortage is a matter of will. The City already has the land and processes in place to approve tens of thousands of units. If City Council holds the Land Bank to the rules it is already meant to follow and respects its actions by no longer killing housing projects with councilmanic prerogative, Philadelphia can unleash its untapped economic potential. A city with such history, culture, and people has no excuse to be anything other than exceptional.

Competitive and Mixed Use Proposals Allow for No Discretion

The legislation that created the Land Bank and empowered its Board contains no language authorizing review of proposals via subjective values or opinions. Neither the state enabling statute,[12] the City Land Bank establishing ordinance,[13] the Original[14] or First Supplemental Services Agreement/Turn the Key program's establishing ordinance,[15] nor the City Disposition Policy[16] allow for the Board to inject reasoning or requirements unknown to project applicants. Any time members of the Board vote based on personal opinions, they step outside the authority that was granted to them. Moreover, this pattern of behavior has long been called out, including by internal staff. Anne Fadullon, former Chair of the Philadelphia City Planning Commission, the Board of the Philadelphia Redevelopment Authority, and the Board of the Philadelphia Land Bank, reportedly "often remind[ed] the Land Bank board members, the question before them on Turn the Key and 51/49 projects is not whether they personally approve of the proposal, but whether the proposal complies with the law and the applicant has the credentials to deliver on their plan."[17] These efforts at accountability indicate that the Board's behavior is not based on ignorance but rather a purposeful effort to overstep its authority and diminish housing development in the process.

Furthermore, both as a matter of law and simple practicality, the Land Bank process is only effective if it is transparent and consistent. Going before the Board is an expensive,

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[12] PA C.S. 68 §§ 2101-2121.
[13] Philadelphia Ordinance 130156-A.
[14] Philadelphia Ordinance 170878.
[15] Philadelphia Ordinance 230452.
[16] Philadelphia Land Bank**.** *Disposition Policies.* Philadelphia Housing Development Corporation, 2020, https://phdcphila.org/wp-content/uploads/Resources/Philadelphia-Land-Bank-Disposition-Policies-2020.pdf.
[17] Geeting, Jon. "*Houses for the Poorest? Or for Middle Class Philadelphians?*" *The Philadelphia Citizen,* 20 Sept. 2023, https://thephiladelphiacitizen.org/houses-for-the-poorest-or-for-middle-class-philadelphians/.

time-consuming process that only works if (a) applicants know what to expect and (b) a compliant proposal has a realistic chance of moving forward. If the Board's criteria are unclear and subjective, there is no way for an applicant to know how the Board will vote until they've completed the full process. This lack of consistency and transparency drives away applicants and undermines the Land Bank's mandate.

Digging into the specifics of funding programs, such as Philadelphia's Turn the Key (TTK), tells a similar tale and illustrates how the Board is meant to conduct reviews. Local ordinance breaks land disposition applications into two categories: competitive and non-competitive. The TTK program connects first-time homeowners with development partners to build resilience and equity, though it is strictly a funding program administered by PHDC and does not dispose of property on its own. However, Turn the Key highlights the need for the competitive proposals which are often at issue for eligible properties. Regarding such competitive proposals, Philadelphia law *does* say that the Land Bank "shall evaluate applications" based on specific criteria[18] that have nothing to do with aesthetics or personal opinions of the Board, exclusively being limited to a numerical score consisting of:

- 30% for economic opportunity and inclusion;
- 15% for public purpose – social impact;
- 20% for development team experience and capacity;
- 20% for financial feasibility;
- 10% for project design; and
- 5% for offer price.

This weighted rubric is the only criteria authorized by Philadelphia city law. It makes room for discretion on the part of City Council, which may choose to finalize Board recommendations through resolution by ordinance, but it does not make such allowances for Board members themselves. For example, 1604(4)(a) requires applicants to hold public

[18] Philadelphia Ordinance 190606-AA.

community meetings before finalizing any sales.[19] The Agency (comprised of Land Bank and the Philadelphia Redevelopment Authority) is only authorized to reject applicants for not holding that meeting; it does not have authority to deny a project as a result of the discussions in that meeting. Only Philadelphia's City Council members, as public representatives, are tasked with responding to the needs expressed by their constituents; appointed board members and other non-elected officials do not have that authority.

Non-competitive proposals, such as the Mixed Use or 51/49 program, operate with even less room for staff inquiry. If a proposal seeks a side or rear yard, community garden, or if at least 51% of the project is affordable, workforce, or mixed income housing, it forgoes the competitive process. Once a proposal has been deemed suitable, the Agency "shall provide that applicant with a purchase or lease agreement."[20] Moreover, as with competitive proposals, non-competitive projects are to be reviewed under specific, limited criteria: "Applications for non-competitive dispositions shall be evaluated for financial and operational capacity to complete the proposed project, and other considerations, in accordance with the Disposition Policy."[21] The Disposition Policy itself makes no mention of personal discretion, containing three factors that determine whether an applicant is or is not qualified under city law. Most critically, **the Land Bank itself considers non-competitive proposals ministerial actions allowing for no staff discretion**. A request for clarification to the City Board of Ethics[22] distinguished "between transactions which involve some discretionary decision…and those that follow the literal rules of an established policy, e.g., side yard sale consistent with the Land Disposition Policy." That document, submitted by the Land Bank's Interim Executive Director Scafidi, identified non-competitive proposals as literal rules following established policy, with no room for staff discretion.[23] Side yard sales and mixed use projects therefore offer no room for Land

[19] *Id*. at 16-404(4)(a).
[20] *Id*. at 16-404(2)(c)(.3).
[21] *Id*. at 16-404(2)(d)(.2).
[22] Philadelphia Board of Ethics Board Opinion No. 2016-002, July 26, 2012, available at https://www.phila.gov/ethicsboard/Advisory%20Opinions/BD.Op.2016-002.pdf.
[23] See note 18 at pages 25-26, pages 6-7 of Interim Director Scafaldi's letter to the Ethics Board.

Bank staff to make any decision other than whether a proposal complies with City policy or not.[24]

Philadelphia's City Council empowered the Board to make determinations on behalf of the Land Bank but not on behalf of themselves and their subjective opinions. The members of City Council are elected by the community and valued for their perspective and responsiveness to that community. The Board was appointed to fulfill the mandate that they were given by law and to go no further. Every time they overstep their legal authority, they supplant the role of democratic decisionmaking, replacing the voice of the community and its representatives with their own. These actions are unlawful and unbecoming of public servants.

[24] Note that the Ethic's Board's response stated that such decisions are discretionary, but the Board was not using "discretionary" with the same meaning as the Land Bank. The Ethics Board cited decisions that reviewed not discretion as the ability for an official to include personal decisionmaking as a matter of legal policy but rather discretion as the potential of unlawful influence to affect their decisions. Properly reviewing the official actions referenced, the Ethics Board was concerned with whether a corrupt official has the *ability* to improperly influence procedure, not whether that official was legally authorized to exert discretion. Logically, any question to an Ethics Board asking if certain decisions by officials should be excluded from anti-corruption lobbying laws is going to be met with a "no."

Councilmanic Prerogative & Separation of Powers

While the voice of Philadelphia's community is important to questions of land use, the Board is not empowered to be that voice. Defenders of their discretion are likely to point to an ordinance suggesting that city agencies are not required to make any dispositions, but that framing disregards the structure of city governance and the role of Philadelphia's City Council. Several sections of the law and disposition policies note that the city is not strictly required to sell land to even compliant projects. Ordinance language delineating competitive proposals contains the disclaimer: "The Agency may select an applicant based upon such criteria to the fullest extent permitted by law, or it may choose not to select any applicant."[25] The Land Bank ordinance also states, "Nothing in this Chapter shall obligate an Agency to dispose of a surplus property to an applicant for such property, including the highest scoring applicant in a competitive process."[26] It would appear that these rules grant the Board absolute discretion to deny projects, but such an interpretation rests on ignoring a crucial legal distinction: **the Board is not the "Agency"; instead, it is a part of that Agency with distinct responsibilities**. The Agency includes both the Land Bank *and* the Philadelphia Redevelopment Authority.[27] The Board is only the body which reviews and votes on the sufficiency of proposals. That body must evaluate proposals by the criteria authorized by city law. Moreover, the "Agency" as a whole is limited by the decisions of City Council. Regardless of any decision by the Board, action by Council is required for any final disposition, which is why nothing in the law obligates the Agency to dispose of land; it can't do so on its own authority because it must allow for Council decisions on proposals. **Thus, where a proposal complies with city criteria, the Board must vote for approval.**

[25] See note 15 at 16-404(2)(c)(.2).
[26] *Id*. at 16-404(4)(c).
[27] *Id*. at 16-402(b).

A recent decision in Tampa, Florida, illustrates the importance of these crucial safeguards. Liberty Hospitality v. City of Tampa[28] ruled that Tampa's City Council had no authority to review quasi-judicial land use matters because the power to legislate zoning must be distinct from the executive/administrative responsibility of deciding whether individual proposals comply with the law. Council makes rules defining what is or isn't a compliant project, and the Board must decide whether individual proposals meet that criteria. Council has authority to decide whether a project is, politically speaking, a good fit for a given community, but not whether it meets the criteria established by the law. Blurring those lines risks opaque, expensive processes that serve no purpose for the city, applicants, or residents. If the Board is empowered to make political decisions, it cannot review projects for sufficiency and cannot give Council accurate, actionable opinions. Such a dynamic would grant the Board, an unelected body of bureaucrats, discretion to infect city processes with political interests that it has no authority to evaluate.

These arguments have not been definitively reviewed by any court in Pennsylvania, but the alternative would create an absurd, unworkable result for the City. If the Board has absolute discretion over approvals, members can vote down projects for any reason or no reason at all. Developers would be subjecting themselves to a farcical gamble any time they want to deal with city departments. Unchecked discretion would mean that every ordinance, rule, procedure, and policy governing what applicants must submit for approval is meaningless and offers no guarantee whatsoever that applications will be evaluated fairly. If the Board has absolute discretion, it has no obligation to be fair, to value housing, or to respect the recommendations of Land Bank staff. This result would be inefficient, un-democratic, and rightfully undermine faith in Philadelphia systems. Residents deserve reliable governance which respects its own rules.

[28] *Liberty Hospitality Management, LLC v. City of Tampa*, No. 20-CA-10739 (Fla. Cir. Ct. 2024). available at https://www.carltonfields.com/getmedia/c83a5806-5bcd-4274-a884-c039332205db/liberty-hospitality-management-v-city-of-tampa.pdf.

Recommendations & Conclusion

The recent staffing changes and commitment to reviews signal that Philadelphia may be about to seriously reconsider the problems The Land Bank creates through needless, sometimes unlawful procedures.[29] Following through and holding the Board to its mandate could turn a roadblock into a critical tool for economic development and poverty reduction. If Philadelphia's Land Bank follows its own policies, proposal reviews will become faster and more accurate, creating affordable housing for Philadelphians and avoiding the risk of litigation that comes with illegal denials of qualifying proposals.

While the Board is legally bound to reform its processes, the Land Bank has other obstacles that need to be addressed. Additionally, disposition is also slowed by the need to review proposals, instead of appreciating the potential for broader growth.[30] Rather than reviewing individual projects, **disposing of land *across the city*** would lead to an upsurge of affordable units and market rate units, driving down housing costs across Philadelphia. Instead of selling lots one by one, the City could combine reviews for multiple lots; contiguous lots would create dense multifamily housing and make for a massive return, allowing the City great room to negotiate and define the terms of that growth.

Comprehensive growth must also be paired with oversight and respect for existing procedure. City Departments must follow their legal mandate to **conduct regular performance reviews and strategic plans**. Doing so would provide their staff and council a holistic understanding of what properties are available to both the Land Bank and Redevelopment Authorities, and create a unified policy to dispose of these lands by both bodies.

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[29] Jake Blumgart, *Mayor Parker shakes up Land Bank board to try to further her housing plan*, Philadelphia Inquirer, 20 Oct. 2025, https://www.inquirer.com/real-estate/housing/philadelphia-land-bank-parker-30000-houses-20251020.html.

[30] The Philadelphia Citizen Staff. *Your City Defined: Councilmanic Prerogative.* The Philadelphia Citizen, 1 May 2022, https://thephiladelphiacitizen.org/your-city-defined-councilmanic-prerogative/.

Mayor Parker promised "to put people on a path to self- sufficiency and…not engage in policy making that breeds class contempt, by pitting the have-nots against those who have – just a little."[31] Her commitment is laudable and achievable. It requires not more effort, but less work on behalf of the Land Bank, which can move projects forward more efficiently if it disregards irrelevant personal prejudice. Philadelphia has the land, the staff, the expertise, and the interest in new development to make this vision a reality.

[31] City of Philadelphia. "Mayor Parker Delivers Housing Opportunities Made Easy (H.O.M.E) Address to Special Session of City Council." Phila.gov, 24 Mar. 2025, https://www.phila.gov/2025-03-24-mayor-parker-delivers-housing-opportunities-made-easy-h-o-m-e-address-to-special-session-of-city-council/.

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