

July 25, 2018

Please Oppose Enactment of H.4546 “Community Benefit Districts” (CBDs)

We are a diverse group of organizations with a variety of different priorities. But we are joined in our opposition to this bill for one or more of the following reasons.

We ask that you not enact this legislation:

1. The bill would confer on private property owners in residential as well as commercial neighborhoods the power to impose special assessments on their neighbors to fund activities that a minority of property owners – those who own the most valuable pieces of property – support, all with no controlling standards or proper checks and balances on how that power can be wielded. This is essentially **taxation without representation**.
2. The bill would confer on these wealthiest property owners in a neighborhood the power to “own” public parks and sidewalks in the neighborhood and to “administer and manage” the self-created district – with **no safeguards for rights of speech and assembly or nondiscrimination** on the basis of race, national origin, religion or other protected status.
3. The bill would allow the newly created districts to employ and empower private security personnel, with no protections against displacement of municipal workers or abuses of constitutional rights and **no requirements for accountability**.
4. The bill would deny neighborhood residents who are tenants but not property owners the right to have any say on whether these districts are formed or how they are operated, even though their activities may well transform the nature of the neighborhood and **drive up rental prices**.
5. The bill makes **no provision for compliance with Public Records, Open Meeting** or Prevailing Wage laws.

6. House 4546 would impose a significant administrative burden on municipalities' collectors and treasurers. They would be required to issue tax bills and collect funds for private organizations. It would also require them to place ***liens on properties for nonpayment of the CBD assessments***; the procedures for this process have not been fully addressed in the bill.
7. The bill would impose an additional ***financial burden on residents*** to pay for services beyond those historically provided by the state and municipality, thereby essentially creating a wholly new tier of government at the neighborhood level, without any mechanisms of accountability.

We ask the Legislature not to enact this bill.

Sincerely

Georgia Katsoulomitis
Executive Director
Mass Law Reform Institute

Brenda Rodrigues
President
SEIU, Local 888

Carol Rose
Executive Director
ACLU of Massachusetts

Juan M. Cofield
President
NAACP, NE Area Conference

Pam Wilmot
Executive Director
Common Cause Massachusetts

Chip Ford
Executive Director
Citizens for Limited Taxation

Steve Lonergan
Vice President and Legislative Chair
Mass. Collectors and Treasurers Assoc.

Kathy Brown
Executive Director
Boston Tenant Coalition

Gladys Vega
Executive Director
Chelsea Collaborative

Lisa Owens
Executive Director
City Life/Vida Urbana

Isaac Simon Hodes
Coordinating Committee
Lynn United for Change

Meris L. Bergquist
Executive Director
Massachusetts Fair Housing Center

