

City's reliance on complaints for property maintenance enforcement disproportionately affects diverse and gentrifying neighborhoods



November 2021

The City of Portland enforces an extensive set of rules for how residents should maintain their homes, from overgrown lawns to a pile of pallets in the driveway. It is almost exclusively a complaint-driven system, with neighbors and passersby filing confidential reports that are investigated by City inspectors.

The system consistently generates more complaints to the Ombudsman's Office than any other City program. Community members, advisory groups, and City inspectors have all raised concerns about the fairness of a system that can result in heavy fines and burdensome liens on some of Portland's most economically vulnerable property owners. Analysis of the Bureau of Development Services' data confirms there is reason for concern: Complaint-based enforcement disproportionately affects communities of color and neighborhoods vulnerable to gentrification.

City Council adopted equity goals that commit the City to ending racial disparity in government and to do so with urgency and accountability. The unequal effect of the City's property maintenance enforcement system on communities of color, however unintentional, joins a long list of existing inequities burdening them, perpetuates historical racist policies, and undermines the City's equity goals.

The Ombudsman's Office recommends that the Commissioner-in-Charge of Development Services commits to eliminating the disparate outcomes of Portland's enforcement system with due haste. We recommend that the Commissioner-in-Charge immediately engage with burdened communities to seek their recommendations on changes to the property maintenance code and identify an equitable enforcement mechanism and appropriate funding source that does not rely on fines and liens.

Portlanders object to City's property maintenance enforcement system

City Code contains maintenance standards to which privately-owned, owner-occupied properties in the city must adhere. The wide-ranging standards govern the appearance of properties by regulating uncut grass, peeling paint, fence height, accumulated trash or debris, vegetation encroaching into the sidewalk, and vehicles parked on unpaved areas.

Rather than routinely and systematically inspecting residences, Development Services relies on complaints from the community to enforce the rules. If, in response to a complaint, City inspectors find a violation, they will notify the property owner and give a deadline to get into compliance. If the violation is not corrected, Development Services will fine the owner and place a lien on the property, which gives the City rights to collect the fine from the proceeds of any sale of the property. The Bureau primarily relies on the collection of fees and fines to operate the program rather than General Fund revenue from City Council.

Since the Ombudsman's Office started in 2001 to take complaints about City government, issues with the fairness and efficacy of the property maintenance enforcement system have topped the list of Portlanders' concerns. Many anecdotally demonstrated a devastating economic impact on households owned and occupied by those who were elderly, had a disability, or least able to pay.

To better understand the scope and nature of the outcomes of the City's enforcement system, the Ombudsman's Office analyzed six years' worth of maintenance complaints received by Development Services. Our analysis focused on owner-occupied properties that were the subject of a total of 15,227 complaints (about 2,500 complaints per year) from 2013 through 2018.

The results showed statistically significant disparate effects on communities of color, probably an unsurprising finding given the historical roots of complaint-driven enforcement. In this report, we situate our findings within a broader context of what Portland neighborhoods are experiencing, including economic vulnerability and the effects of climate change.

System is rooted in history of racial oppression

Oregon's Constitution enshrined racist and white supremacist ideologies in the mid-1800s, declaring Oregon a "Whites-only" state and prohibiting Black Americans from owning property or entering into contracts. Lawmakers further cemented racist legal structures by passing Black exclusionary laws, which barred Black settlers from coming to or remaining in Oregon.

Other noteworthy events included:¹

- In 1919, the Real Estate Board prohibited agents from selling homes to individuals "whose race would greatly depreciate, in the public mind, surrounding property values."
- In 1921, Ku Klux Klansmen met with Portland's Mayor, Police Chief, and other civic leaders to publicly demonstrate the Klan's close relationship with policy makers and law enforcers.²

It was during this time of explicitly racist governance that the City first adopted property maintenance regulations (1903) and relied on complaints (1914) to enforce them.³

Unlike building or housing regulations that use engineering and other technical standards to assure safe, sanitary, and structurally sound housing, many exterior maintenance, nuisance, and zoning regulations reflect subjective social concepts of livability, attractiveness, and "wishes of the neighborhood."⁴ In the 1940s, Mayor Earl Riley warned of perceived threats of Black residents to the existing neighborhood aesthetic, cautioning that "Portland can absorb only a minimum number of Negroes without upsetting the city's regular life."⁵

Although the City has done away with explicitly racist policy justifications,⁶ many – if not most – of the underlying assumptions and approaches to service provision are largely unchanged. As recently as 2018, Development Services, which is responsible for enforcing compliance with City maintenance codes and State construction codes, explained that not all the property conditions it enforces are directly related to health or safety concerns. Rather, “[e]nforcement of this code also applies to the overall look and feel of a neighborhood.”⁷ The Government Alliance on Race & Equity identifies actions like these as explicitly racist laws and practices being merely replaced with laws that appear “race-neutral” in language but continue to drive disparate outcomes for people of color.

How the enforcement system works

Once a neighbor makes a complaint about another’s property, Development Services opens a case and dispatches an inspector to investigate. The inspector will determine if a violation of the property maintenance, zoning, or nuisance code exists. If inspectors see any additional violations, they will cite those as well. The property owner then receives a letter from the Bureau, listing the violations and informing the homeowner they have 15 or 30 days to correct them.

Process from complaint to penalty



The notice of violations can come as a surprise to homeowners, who may not have the time, resources, or ability to make prompt corrections. They may have lived in the home with the same conditions for decades. Or they might have intentionally deferred maintenance to address more pressing needs in their lives. Nonetheless, if a violation remains after the deadline, Development Services issues a fine to the homeowner and places a lien on the property. Liens affect the property’s title, making it difficult to sell, refinance, or borrow money. All violations are fined the same amount, regardless of whether they are trivial or substantial, a matter of aesthetics or public safety.

The liens are also “revolving,” which means they automatically and continually increase over time from escalating penalties, billing charges, and interest. For example, if a homeowner does not fix a loose gutter within 30 days, they will be fined \$299 every month for the first three months. After three months, the fines double to \$598 every month until the violation is fixed and inspected. In addition to the fines, there are various reinspection and administrative fees, as well as statutory interest. This can turn small-bore maintenance issues into

overwhelming financial liabilities for homeowners. While there are some programs that may provide limited assistance, homeowners across Portland currently owe the City \$10.5 million in outstanding enforcement liens.

Case example

A homeowner accrued nearly \$30,000 in enforcement liens because she did not address neighbors' complaints about paint peeling off her home's exterior. The homeowner was struggling financially, while dealing with a family member's mental health crisis and caring for her aging parents. She prioritized paying for her basic needs over painting her house.

Enforcement system is inequitable

An inherent problem with deploying enforcement resources based on complaints is that it results in inconsistent treatment.⁸ For instance, a shed too close to the property line may bother a neighbor in Montavilla but not one in Bridlemile. One homeowner can get cited for a fence that is too tall, while multitudes of other homeowners with similar fences do not, because no one complained about them.

City inspectors have flagged other problems: neighbors can weaponize a complaint-driven system against each other over trivial maintenance issues; neighborhood newcomers tend to file complaints against long-term residents; and complaints can unduly harm vulnerable community members over matters unrelated to health or safety. The Ombudsman's Office has investigated multiple cases over the past two decades that demonstrate how relying on complaints, fines, and liens to gain compliance with maintenance standards can be devastating and debilitating for people who are cash poor, elderly, and/or living with illness or disability.

Case example

A 79-year-old blind veteran accrued more than \$88,000 in enforcement liens because he did not address neighbors' complaints about tall grass and storing a boat and vehicles on his property.

Various outside reviews over the years also have questioned the City's reliance on punitive measures to obtain compliance, particularly in situations when the household cannot afford to make the mandated repairs. For example, the 2008 Quality Rental Housing Workgroup noted that "[t]he lack of reliable General Fund support to fully fund the Nuisance Abatement Program creates an incentive to fine for noncompliance rather than pursue customer service and habitability." The Workgroup recommended that "nuisance abatement activities outside of rental housing should be funded by the General Fund rather than private property owners cited for Housing Code violations."⁹

A 2012 consultant’s audit similarly recommended that Development Services “reconsider its use of revolving penalties and find other ways of assisting and encouraging property owners with compliance issues.” The Bureau declined this recommendation at the time, indicating in its written response it did not understand how the audit arrived at the recommendation, pointing to City Council’s approval of its fee structure, and arguing that most households avoid fines by timely complying with violation notices.¹⁰

In response to the individual objections, outside reports, and internal concerns, the Ombudsman’s Office analyzed six years’ worth of complaints received by Development Services about owner-occupied properties. The analysis allows us to move beyond anecdotal information and begin to understand which communities are most affected and why.

We examined 59 neighborhood factors, including crime, income levels, poverty rates, distressed property sales, and average home age to determine whether there were statistically significant correlations between the factors and the rate of complaints. We also analyzed whether there were trends among the types of complaints and City inspectors’ violation determinations.

Results: Households in racially diverse and gentrifying neighborhoods subjected to higher complaints

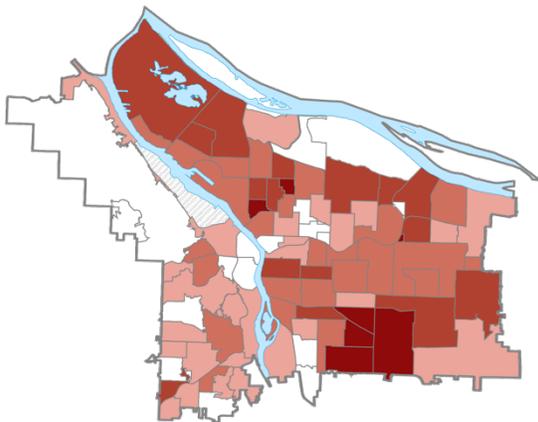
The analysis shows the City’s reliance on complaints for enforcement adversely affects communities of color and neighborhoods vulnerable to gentrification. **Race/ethnicity** and the **five-year change in home value** were the two neighborhood factors with the strongest positive association to complaint rates.¹¹ On average, households in neighborhoods with higher percentages of people of color and greater increases in median home prices over five years were most strongly associated with higher complaint rates. The following table summarizes the variables analyzed and the strength of the correlations.

Complaints tend to increase ↑ as [____] increases ↑	Strength of Association
Percent people of color	Strong
Change in median home price (2013 to 2017)	
Adjusted population	Medium
Minutes by car to downtown	
Homes sold in 2017	
Percent of population that has never married	
Percent of population below the poverty level	Weak
Percent of households with children under 18	
Burglaries reported	
Vehicle thefts reported	

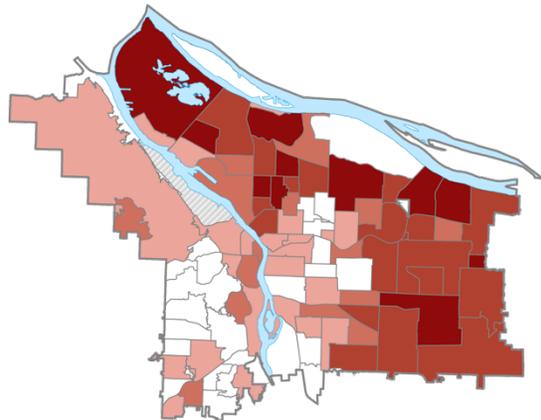
Complaints tend to increase ↑ as [____] decreases ↓	Strength of Association
Average days homes stay on market	Medium
Percent of condo sales	
Median age of population	
Percent of population over 25 with a graduate degree	
Crimes reported per 1,000 residents	
Average home cost per square foot	
Average year built (homes)	
Percent of population who speak English as their only language	
Percent who commute by walking	
Median household income	Weak
Median monthly housing expenses for renters	
Number of MAX and streetcar lines	
Miles of bike path per square mile	
Average home price	
Percent of the population that is married but separated	
Percent of population over 25 with a bachelors degree	

Viewed geographically, the disproportionality of the complaints illustrates the relationship between neighborhoods with higher rates of complaints and those where more people of color live. The following maps show that areas with high complaint rates are similar to areas where more people of color live.

Complaints per 100 households



Percent of population that is people of color



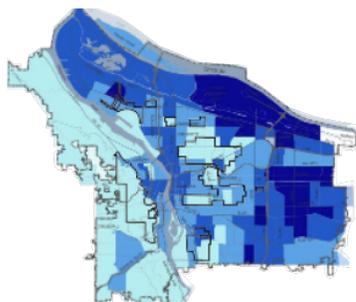
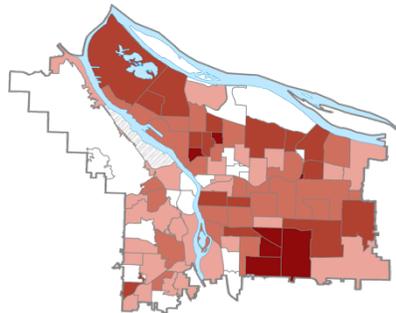
James Baldwin said in 1968, "I don't know what most white people in this country feel, but I can only conclude what they feel by the state of their institutions."¹² The data show that the state of our system produces disparate outcomes based on race. It shows there is a problem with the City's continued use of a complaint-based enforcement system that began in a long-ago era of explicitly racist governance.

The disparate effect of the City's enforcement approach compounds inequities already experienced by Portland's communities of color. Comparing the geographic distribution of other indicators shows that enforcement occurs most often in the same neighborhoods and communities that:

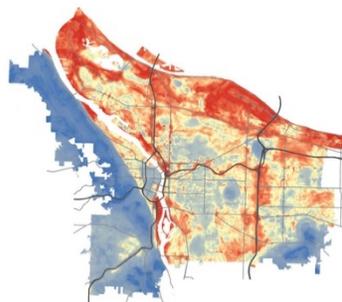
- bear a disproportionate burden of climate change,
- are most susceptible to displacement caused by gentrification,
- do not benefit from government subsidies, and
- face poorer health outcomes.

The composite picture shows how structural racism is connected to Portland's geography,¹³ and contributes to the "concentration of disadvantage."¹⁴

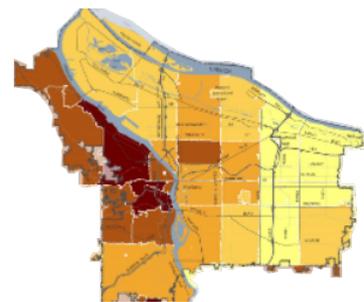
There are similarities between **neighborhoods with higher property maintenance complaints** and...



... neighborhoods that have **greater economic vulnerability**, ...



... neighborhoods bearing the brunt of **higher temperatures**, ...



... and **neighborhoods not benefitting from a mortgage deduction program**.

City enforcement actions did not take unequal complaint patterns into account

Adverse enforcement outcomes for communities of color persist throughout the process. The Ombudsman's Office compared fine and liens rates by neighborhood to determine how Development Services' inspection and enforcement actions affected the disparities present in complaints brought to the City's attention. For instance, if the complaint rates in neighborhoods of color were high but lien rates were low, it would indicate that Development Services' response to the complaints reduced the disparate effect on that neighborhood.

Development Services' actions perpetuated inequities

The analysis showed Development Services' response to complaints did not reduce the disparate effect, and that the disparities found in the initial complaint rates persisted through the violation and lien stages of the enforcement process.

Thus, although the enforcement process did not worsen the disproportionate impact on communities of color or neighborhoods vulnerable to displacement, the process also did not correct for the disproportionate complaint rates. As a result, the City imposed a higher rate of violation citations and liens against the same neighborhoods subjected to higher complaint rates, particularly neighborhoods of color.

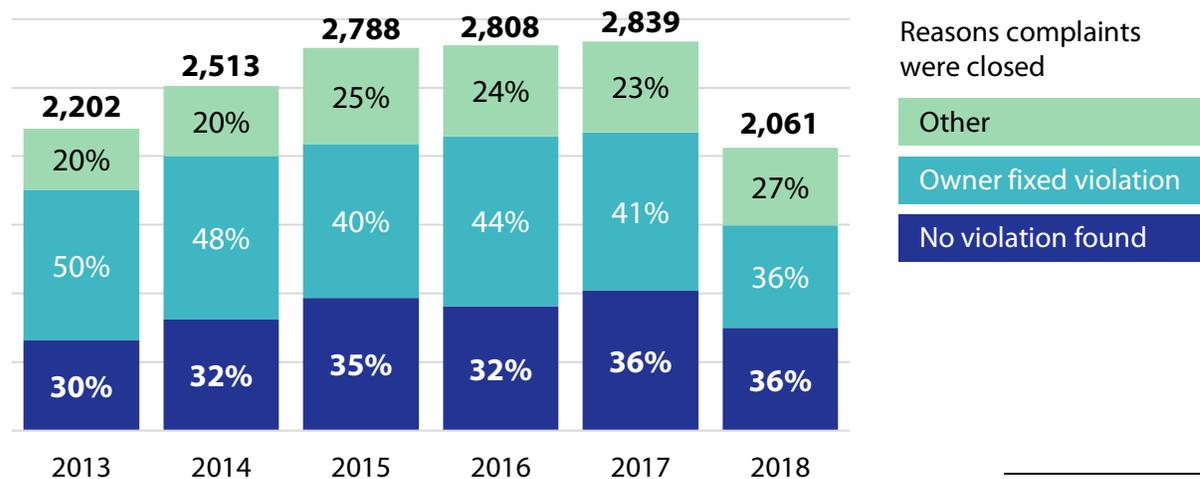
Case example

An elderly homeowner with a severe brain injury accrued more than \$136,000 in enforcement liens because of neighbors' complaints about a disabled vehicle, a boat in his yard, a tarp over his carport, and remodeling that he was unable to finish. City liens prompted the bank to initiate foreclosure proceedings, and he nearly lost his home as a result.

Enforcement system is inefficient

The data suggest that complaint-driven enforcement is inefficient. Complaints about owner-occupied properties tend to be about exterior conditions, such as uncut grass or peeling paint. Our analysis shows that year after year, more than 30 percent of all complaints were determined to be without merit.

About one-third of complaints had no violations



Certain complaint types had higher rates of inspections not resulting in violations, such as complaints about tall grass and weeds. For almost half of those complaints – 46 percent – inspectors found no violations.

This result casts doubt on the efficiency and effectiveness of relying on complaints to direct enforcement resources for owner-occupied properties. The rates at which inspectors found no violation could be because neighbors were complaining about issues that were not Code violations or because the property owner mowed the lawn or removed the debris by the time inspectors responded. Either way, the data highlight whether assigning limited inspection resources based on neighbor complaints is a good use of scarce public resources.

City's commitment to equity applies to enforcement system

City Council through binding policies committed the City to end racial disparity in government with urgency and accountability. Given that complaint-driven enforcement disproportionately burdens the very property owners City Council promised to protect, it must develop a fair approach that meets public health and safety goals and is appropriately funded without burdening communities of color.

As the report *The African-American Community in Multnomah County: An Unsettling Profile* explained, “[p]utting the value of equity into practice will require changing the way these public institutions work: how government and partners make decisions; where they invest; how services and programs are delivered; how they engage with all Portlanders and newcomer communities; and how success is measured.”¹⁵

To that end, the Commissioner-in-Charge of Development Services, in consultation with affected communities, should thoroughly examine the role of government in the regulation of owner-occupied dwellings beyond public health and safety. Is it possible to have anti-racist goals related to maintaining real estate values or preserving neighborhood livability? Who defines these concepts and who benefits? It is essential that the voices of affected communities help answer these questions and determine others that need to be asked to ensure that any future iterations are equitable and serve an appropriate purpose.

To its credit, Development Services recently has been assessing its practices and spearheading reforms of the responsibilities under its control. In October 2020, Development Services Director Rebecca Esau issued a memorandum outlining the direction of the Bureau, including a commitment to identify and eliminate institutionalized racism. Director Esau cited property maintenance standards as an example of a longstanding and ingrained system that perpetuates disparate outcomes by race. The Bureau's Budget Advisory Committee in January 2021 recommended the City revisit the property maintenance code, “particularly with respect to its relationship to racial equity.”¹⁶ Bureau managers and staff have undertaken a comprehensive and sustained effort to examine how they prioritize enforcement resources and exercise their discretion. The Bureau's willingness to embrace change and chart a new, more equitable path forward, makes it an ideal partner to work with the Commissioner-in-

Charge to pursue structural reform and is an example for others to emulate – particularly for other City programs that rely on complaint-driven systems of enforcement.¹⁷

Recommendations to the Commissioner-in-Charge of Development Services:

1. Commit to eliminating the disparate outcomes of the complaint-driven property maintenance system as soon as practicable and with urgency.
2. Immediately engage with the communities that have been adversely affected by the property maintenance enforcement system to seek and act on their recommendations for:
 - a. Whether there is a role for government in the regulation owner-occupied dwellings beyond public health and safety.
 - b. Equity-driven revisions to the property maintenance and condition standards for owner-occupied properties, including maintenance, nuisance, and zoning standards in Titles 29, 33, and any other relevant City Code titles.
 - c. How to equitably enforce property maintenance standards for owner-occupied properties.
 - d. How to equitably fund enforcement of property maintenance standards for owner-occupied properties.
3. Assign a project manager to facilitate engagement and propose reforms to City Council and Bureau managers.

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Margie Sollinger, Ombudsman

Project Team

Amanda Lamb, Chief Deputy City Auditor

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¹ Nokes, G. [Black Exclusion Laws in Oregon](#). Oregon Encyclopedia – A project of the Oregon Historical Society.

² Platt, A. (2009; revised 2021). [KKK meets with Portland leaders, 1921](#). Oregon History Project.

³ History of Neighborhood Inspections, Bureau of Development Services; Memorandum from Development Services Director Margaret Mahoney to Sam Adams, Chief of Staff to Mayor Vera Katz, January 22, 2003, regarding report to Council on neighborhood inspections and code enforcement.

⁴ Development Services Title 29 compliance document, available at <https://www.portlandoregon.gov/bds/28397> (last accessed June 24, 2020).

⁵ Streckert, J. (April 23, 2014). [An Act of God... or Racism? The Lost City of Vanport: How a Flood and Racism Changed Portland- Feature - Portland Mercury](#) (quoting an Oregonian article).

⁶ It was not until 2002 that Oregon voters removed the explicitly racist language from the Oregon Constitution, and even then, 30 percent voted to keep it.

⁷ "Housing & Nuisance Code We Enforce" (accessed 6/19/2018, previously found at <https://www.portlandoregon.gov/bds/article/25079>). That language has since been updated.

⁸ The Portland Tribune's Peter Korn wrote a "Snitch City" series on this topic in 2011. The series profiled a downtown property owner who was quoted as saying, "I didn't know we lived in a world where you have laws only applied when you have a complaint. There's either a regulation or there's not. That's a lousy way to run a government. You make a rule, you enforce it."

⁹ [Quality Rental Housing Workgroup Final Report \(2008\)](#) at 19. Approximately 60 percent of the program's funding comes from 10 percent of property owners who do not timely correct violations (notes from meeting with Development Services manager).

¹⁰ [Performance Audit of City's Liens, Collections and Foreclosure Process \(2012\)](#) at 33 and appended audit response letter from Development Services.

¹¹ Conversely, neighborhoods with a higher percentage of people with advanced degrees saw lower complaint rates.

¹² James Baldwin in 1968 on The Dick Cavett Show, in conversation with Yale Professor Paul Weiss, available at <https://youtu.be/a6WIM1dca18>.

¹³ [Historical Context of Racist Planning \(2019\)](#), Bureau of Planning and Sustainability, at 20, 23; Williams, K. (Jan. 20, 2020). [Historically racist housing policies exacerbating climate change effects in low-income Portland neighborhoods](#) (using a map from Portland State University Professor Vivek Shandas' 2018 analysis showing temperature disparities in Portland).

¹⁴ Coates, T. (2014, June). [The Case for Reparations](#). *The Atlantic*.

¹⁵ [The African American Community in Multnomah County: An Unsettling Profile](#) at 4, Coalition of Communities of Color & Portland State University.

¹⁶ Bureau of Development Services FY 2021-22 [Budget Advisory Committee Report](#).

¹⁷ Other complaint-driven systems of enforcement include, but not limited to, bees and livestock enforcement, sidewalk repair, residential parking enforcement, emergency response, tree code violations, etc.





**OFFICE of EQUITY
and HUMAN RIGHTS**
CITY OF PORTLAND

Commissioner in Charge:
Ted Wheeler, Mayor

Bureau Director:
Dr. Markisha Webster



October 22, 2021

City of Portland Auditor's Office

1120 SW 5th Ave.

Portland, Oregon 97204

Dear Madam Auditor and City Commissioners,

For longer than our history accurately documents, Black, Indigenous, and communities of color have experienced disparate impacts of racist policies and practices threatening their safety and well-being. Homeownership for communities of color has been fraught with oppressive barriers; this dream is then often met with additional complexities. The current report on BDS Property Maintenance illustrates one facet of a systemically oppressed structure connected to homeownership.

While the content of such reports can be alarming, discouraging, and multifaceted in nature, this type of information sharing can also provide the context for eliminating discriminatory and racist policies and practices in our City services. The Office of Equity and Human Rights is committed to working with all City bureaus and offices to embed equitable, anti-racist strategies---with authentic connection and input from the communities most impacted.

The Office of Equity respectfully asks City Council to digest the contents of this report and use it to shape the direction of services specific to property maintenance for Black, Indigenous, and communities of color in Portland. The recommendations suggested in the report to redress the inequitable outcomes of the complaint-based property maintenance system are sound, providing clear direction for equitable next steps.

Thank you,

Dr. Markisha Webster

Director, Office of Equity and Human Rights

City of Portland

In compliance with Civil Rights laws, it is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any City program, service, or activity on the grounds of race, color, national origin, or disability. To request accommodations, translation and/or interpretation, to file complaints, or for additional information or services, please contact us at 503-823-4433, City TTY 503-823-6868, or Oregon Relay Service: 711.



City of Portland, Oregon
Bureau of Development Services
Property Compliance Program
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner
Rebecca Esau, Director
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TTY: (503) 823-6868
www.portland.gov/bds

Date: October 27, 2021

To: Amanda Lamb, Chief Deputy City Auditor

From: Dan Ryan, City Commissioner
Rebecca Esau, Bureau of Development Services Director

RE: Response to City Ombudsman's Review of Complaint-based Enforcement and Outcomes

Summary Response to Ombudsman's Recommendations

Commissioner Ryan and the Bureau of Development Services agree with the recommendations proffered by the City Ombudsman's report in its review of BDS's code enforcement programs. The report's recommendations cover many of the same items the Property Compliance Division of BDS has either identified as part of its work plan or areas it has been working on since the fall of 2019.

The bureau's goal is to ensure safe and healthy housing and neighborhoods, and we are committed to taking a holistic look at our programs, including current regulations and enforcement policies which may have detrimental impacts, particularly on communities of color and low-income property owners. We are committed to equitable outcomes and dismantling systemic racism in its systems, processes and services, including our property maintenance code and systems for enforcing this code. Work to address this will involve:

- exploring how we could use other models of enforcement than just the complaint-driven system;
- refining the enforcement prioritization policy to continue to reduce impacts on low-income property owners;
- pursuing expanded financial resources in partnership with the Portland Housing Bureau (PHB) and non-profit organizations to assist low-income property owners with needed health-and-safety-related home repairs; and
- developing additional partnerships to assist low-income property owners in maintaining their property.

Since 2018, the Property Compliance Division of BDS is pursuing a variety of systemic code, administrative rule, and policy changes within various sections of its enforcement work. Furthermore, BDS is keenly aware of the disparities and barriers created for marginalized members of our community through enforcement fees and liens, and we agree with the Ombudsman's recommendation for change in this area. Efforts are already underway to address such disparities. Examples of these efforts include:

- In April 2021, work began to revise the Lien Reduction Review Rules and create an implementation process for staff. This new rule will loosen requirements for low income and disabled property owners to qualify for lien reductions from 50% to 100%, and provide an easier path to apply for consideration.

- The BDS Property Compliance team partners with PHB to refer low-income home owners to PHB's home repair grant program to receive financial assistance to make needed home repairs: <https://www.portland.gov/phb/home-repair-retention#toc-home-repair-grants>. As this funding source is inadequate to meet the demand, PHB and BDS are partnering to request additional funding to provide this assistance and help homeowners stay in their homes.
- BDS has a program called the Empowered Neighborhoods Program. This program is designed to serve customers who are Black, Indigenous, people of color, or people who have disabilities defined by the ADA who own property and have received a letter from the Enforcement Program. This program provides the property owner with a point of contact to work with them to help find solutions and resources to resolve the situation, answer questions, and provide other assistance. <https://www.portland.gov/bds/empowered-communities-programs/neighborhoods>

What Can the City Council do?

1. Support the ongoing improvements and changes that the Property Compliance Division of BDS has underway.
2. Provide additional General Fund support over the next several budget cycles to enable BDS Property Compliance to continue making needed improvements, thereby freeing the program from its financial reliance on fines and liens for its operations.
3. Provide ongoing expanded financial support to PHB's Home Repair Grant Program to help low-income property owners in need and ultimately bring properties into a safe and healthy condition, and to ensure that no one is turned away.
4. Provide additional ongoing General Fund support for BDS's Empowered Communities Program so the bureau has more staff dedicated to assist BIPOC and disabled property owners with bringing their properties into compliance and connecting them with resources to help resolve these health and safety issues.