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***Testimony of Eleni P. Christidis
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***Before the Committee of the Whole
Council of the District of Columbia***

Performance Oversight Hearing Regarding the Department of Buildings

February 23, 2023

Legal Aid of the District of Columbia¹ submits the following testimony regarding the Department of Buildings (DOB). DOB's creation on October 1, 2022, held out the possibility of a clean break from the dysfunction that plagued its predecessor agency, the Department of Consumer and Regulatory Affairs (DCRA). Unfortunately, nothing to date has validated the hope that DOB will be any different from DCRA. Legal Aid continues to hear from tenants living with unacceptable conditions like lack of heat, leaks, mold, and pest infestations. Many of these tenants question why they see their rent increasing year after year while the conditions they are experiencing stay the same or

¹ Legal Aid of the District of Columbia was formed in 1932 to “provide legal aid and counsel to indigent persons in civil law matters and to encourage measures by which the law may better protect and serve their needs.” Legal Aid is the oldest and largest general civil legal services program in the District of Columbia. Over the last 91 years, Legal Aid staff and volunteers have been making justice real – in individual and systemic ways – for tens of thousands of persons living in poverty in the District. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal justice system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. More information about Legal Aid can be obtained from our website, www.LegalAidDC.org.

get worse. These residents cannot afford to wait and see whether DOB succeeds or fails. The Council demonstrated that it was serious about reforming DCRA by overriding Mayor Bowser’s veto of the Department of Buildings Establishment Act.² The Council must show the same resolve in making sure DOB succeeds where DCRA failed.

Legal Aid urges the Council to remain active and engaged in shaping DOB into a data-driven agency that prioritizes the health and safety of District renters. To finish the job that the Establishment Act started, the Council must move with urgency to confirm a permanent Director and Strategic Enforcement Administrator committed to transforming the agency into one that actively partners with other District agencies to protect tenant health and safety. The Council must also continue to demand data that tell a complete and clear story about DOB’s efficacy. And it must ensure, through continued oversight and legislation, that DOB makes itself accessible to the tenants it is charged with serving and protecting.

DOB Has Yet to Distinguish Itself from Its Predecessor Agency

So far, DOB has done nothing to alter the perception among tenant advocates and organizers that DOB is merely DCRA by another name. DOB rolled out a new logo and website but has done nothing to change the way it conducts business. It has not shown that it has a vision or plan that is any different from DCRA's failed approach to housing code enforcement. Current leadership has yet to deliver key documents, such as the Strategic Enforcement Plan and Annual Report, mandated by the DOB Establishment Act.³ These deliverables could have given the public and the Council a sense of what changes, if any, the new agency intends to make. Rather than excuse this failure, the Council should respond with greater scrutiny and increased oversight.

² Council of the District of Columbia, “Council Overrides Two Mayoral Vetoes to Ensure Breakup of DCRA, Creation of the Office of the Ombudsperson for Children” (Feb. 3, 2021).

³ See D.C. Law 23-269, §§ 201-202.

DOB Needs New Leadership Committed to Fundamental Agency Change

The impetus for creating DOB was to break up an agency that had a record of failure and make a fresh start.⁴ However, since DOB was created, there has been no change in agency leadership responsible for housing code enforcement. Despite the rapidly approaching March 30 deadline, the Mayor has yet to submit nominations for a permanent Director and permanent Strategic Enforcement Administrator.⁵ The Council should clearly communicate to the Mayor the need to appoint leaders to these positions who will acknowledge DCRA's failures, not defend them. At a minimum, candidates for these positions should be unequivocal in their commitment to agency change. Ideally, candidates would have a background in public health policy or consumer protection and demonstrated success in working collaboratively across agencies and with grassroots community stakeholders (e.g., nonprofits, community organizers, and people's councils).

DOB Needs Reliable Abatement Data to Gauge its Efficacy as an Agency

Underscoring the need for new leadership is DOB's inability – or unwillingness – to use performance measures that tell a clear story about whether DOB's efforts result in improved housing conditions for tenants.

DOB Continues to Publish Data that Obscures its True Efficacy

In past testimony, Director Chrappah pointed to DCRA agency's dashboard as a source of usable, public data reflecting DCRA's performance.⁶ Legal Aid previously testified that the DCRA dashboard was difficult to parse and gave no meaningful insight into DCRA's

⁴ See Martin Austermuhle, "After a Rocky Relationship With The Public, One D.C. Government Agency is Breaking Up," WAMU (Aug. 3, 2022), *available at* <https://dcist.com/story/22/08/03/dcra-dc-government-agency/>.

⁵ See D.C. Code § 1-523.01 (requiring nomination of agency heads, subject to the advice and consent of the Council, within 180 days of the establishment of the agency); Department of Buildings Establishment Act (D.C. Law 23-269), §§ 103(b), 105(c) (requiring the Director and Strategic Enforcement Administrator to be appointed by the Mayor with the advice and consent of the Council).

⁶ See D.C. Council, Committee of the Whole, Oral Testimony of Director Ernest Chrappah, "Performance Oversight Roundtable Regarding 'Implementation of Law 23-269, the Department of Buildings Establishment Act of 2020'" (Feb. 16, 2022).

enforcement strategy.⁷ A week before today's hearing, DOB updated its dashboard.⁸ This newest version still focuses on performance measures related to scheduling inspections and issuing Notices of Infraction (NOI's), revealing nothing about the impact of DOB's work on tenants' living conditions.⁹ Additionally, data obtained from this new dashboard (but which has since disappeared) indicate changes in how DCRA/DOB either previously counted or reported the rate of housing code violation abatement. Data from the new dashboard (white columns in Table 1 below) yield lower percentages of inspections resulting in abatement for FY2021 and FY2022 (see blue column) than what DCRA and DOB previously reported as "Total Repairs Confirmed" and/or "Abatement Volume (Citywide)" (gray columns).

Table 1¹⁰

FY	Inspections with Violations <i>DOB Dashboard 2/16/23</i>	Inspections Resulting Abated <i>DOB Dashboard 2/16/23</i>	Percentage Abated <i>(based on DOB Dashboard 2/16/23)</i>	Total Repairs Confirmed <i>DCRA Dashboard (see Attachment 1)</i>	Abatement Volume (Citywide) <i>DOB Dashboard (pre-Feb. 15, 2023) (see Attachment 2)</i>
2020	5093	2311	45%	45%	45%
2021	5920	2017	34%	43%	43%
2022	8696	2190	25%	55%	69%

If the newest Dashboard numbers are correct (which, admittedly, it is possible they are not), they show that the violation abatement rate for FY2021 and FY2022 were lower

⁷ See D.C. Council, Committee of the Whole, Written Testimony of Eleni P. Christidis, "Performance Oversight Hearing Regarding the Department of Consumer & Regulatory Affairs" (Feb. 24, 2022). See also DCRA Agency Dashboard, *Inspections*, available at <https://eservices.dcra.dc.gov/DCRAAgencyDashboard/index>.

⁸ See DOB Public Dashboard, available at <https://dob.dc.gov/page/agency-performance-dob>.

⁹ See *id.*, "Agency Performance" tab. Of the two performance measures related to housing code enforcement, one measures "the percentage of housing complaints that are inspected within 15 days of a requested time," while the other shows a nearly 100% rate of issuance of an NOI when an inspection results in a violation, which is simply consistent with DOB's current policy of issuing NOI's contemporaneously with NOV's (Notices of Violation).

¹⁰ See *id.*, "Violations and Abatement" tab. I retrieved this data on February 16, 2023. However, since then, "Inspections Resulting Abated" (Column 3) and "Violations Remaining" (not shown in table) data are no longer found on the Dashboard.

than what was shown in prior versions of the Dashboard, and that the rate in FY2022 was just 25%. If these discrepancies are merely the result of bad data or changes in the way DOB counts inspections finding violations as having been abated, this still underscores the need for a clear, consistent, and meaningful measure of “abatement” for data integrity and performance oversight purposes.

For example, DOB’s performance oversight responses reported the number of violations found in complaint-based inspections, as well as the number of violations abated in the same and subsequent fiscal years as follows:

FY	Number of violations (Complaint-based)	Number of violations cited and abated in the same fiscal year	Number of violations abated in a subsequent fiscal year	Total number of violations abated	Abated violations as percentage of total violations
2021	13,293	1,889	1,751	3,640	27%
2022	20,544	4,140	18	4,158	20%
2023	2,719	620	0	620	23%

Using this measure of violations, as opposed to inspections where violations were found, the rate of abatement appears to be even lower.

Achieving violation abatement – the correction of unsafe or unhealthy conditions – is the outcome that directly impacts residents’ health and safety. DOB must figure out how it is going to consistently measure this outcome and make it a key performance measure of housing code enforcement. Simply put, DOB is failing if violations are not getting abated.

DOB Needs More Reliable Ways to Determine Abatement

It is possible that the true violation abatement rate is even lower than some of these numbers suggest. This is because DOB allows landlords to self-attest to abatement by submitting photographs or invoices.¹¹ In Legal Aid’s experience, these forms of proof, particularly when submitted by a party with an interest in avoiding a penalty, are not sufficiently reliable to conclude a safety or health hazard has been adequately abated.

¹¹ See Proof of Abatement Form, *available at* <https://dcra.kustomer.help/contact/abatement-tracking-BJbZLthgw>.

To better evaluate DOB’s true efficacy, the Council should require DOB to report not just whether a violation was abated but *how* DOB made that determination – whether by landlord self-attestation, visual re-inspection, or tenant confirmation. Ideally, DOB should not rely on landlord self-attestation at all. Until that happens, DOB should include a process for auditing self-attested cases (with visual re-inspections or tenant confirmation) and report its audit findings.

DOB Needs to Better Use its Existing Tools for Strategic Enforcement

Hiring More Inspectors and Filling Vacancies is a Good First Step

Legal Aid appreciates the additional funding allocated to in the FY2023 budget to hire at least 29 more housing inspectors. However, we are alarmed that DOB has seemingly filled just four of those positions to date.¹² We continue to advocate that DOB employ one residential housing inspector for every 2,000 residential housing units, as originally proposed in the Tenant and Homeowner Accountability and Protection Amendment Act of 2019, Bill 23-0394. To ensure quality, consistency, and follow-through on enforcement, inspections should be performed by fully trained DOB employees, not resident inspectors that DOB likens to gig workers.¹³

Hiring enough inspectors is crucial if DOB is to respond quickly to unsafe housing conditions, but it is just one component of the enforcement process. Even as DCRA performed more inspections and issued more NOI’s between FY2019-FY2022, the number of “inspections resulting abated” each year for the last three years was about the same, around 2,000.

Table 2¹⁴

	Inspections with Violations <i>DOB Dashboard 2/16/23</i>	NOI Served (Housing-Complaint only) <i>DOB Dashboard 2/16/23</i>	Inspections Resulting Abated <i>DOB Dashboard 2/16/23</i>
FY			

¹² See Department of Buildings, FY22 to FY23 YTD Performance Oversight Questions (Responses).

¹³ See Department of Building, “Resident Inspector Program,” *available at <https://dob.dc.gov/node/1616641>*.

¹⁴ These figures were retrieved from the DOB Dashboard on February 16, 2023. The “Inspections Resulting Abated” data no longer appear on the Dashboard.

2019	3951	1300	1333
2020	5093	2512	2311
2021	5920	3830	2017
2022	8696	6378	2190

This suggests that while DCRA/DOB conducted more inspections and issued more NOI's over the last few years, these efforts have not translated into improved housing conditions for more residents.

DOB Should Report Enforcement Data for Proactive and Complaint-Based Violations on a More Frequent Basis

To better understand where DOB's enforcement process is currently breaking down, DOB must publish and regularly report to the Council key measures of its enforcement activity. Legal Aid supports annual reporting requirements in the DOB Establishment Act, as well as in the reintroduced Proactive Inspection Program Act, B25-0048, which require annual reporting of complaint, violation, fine collection, abatement efficacy, enforcement escalation, and collections escalation data.¹⁵ Legal Aid wants to see this valuable enforcement data collected, presented, and discussed in subsequent oversight roundtables over this fiscal year, to ensure that DOB keeps its strategic planning focused on measurable outcomes rather than on the mere scheduling of inspections. Making this data public will also ensure greater accountability and allow outside experts to study it and make recommendations.

DOB Must Work with Other Agencies to Collect Fines and Impose Penalties on Serious and Repeat Violators

Figures taken from DOB's new dashboard show that DOB has yet to collect over \$72 million in fines from notices of infraction issued for complaint-based and proactive housing inspections from FY2019 to FY2022.¹⁶ DOB must account for why such a large balance of uncollected fines remains on its books. If DOB claims it is due to the fault of another agency, DOB's strategic plan must lay out what steps DOB will take (including

¹⁵ See above, n. 3.

¹⁶ See DOB Public Dashboard, "Enforcement" tab. I retrieved this information by selecting filters for FY2019, FY2020, FY2021, and FY2022; selecting, for Business Unit, "Housing-Complaint" and "Housing-Proactive"; and selecting, for Payment Status, "NOT PAID."

execution of specific memoranda of understanding) to address this breakdown in enforcement.¹⁷

Similarly, DOB should report how often it suspends or revokes business licenses or certificates of occupancy. The Office of Inspector General previously reported that DCRA lacked policies for suspending business licenses and declined to do so as an enforcement mechanism, even though it had this authority.¹⁸ Landlords who repeatedly fail to abate housing code violations should face a real risk of suspension or non-renewal of their license. The enacted Eviction Record Sealing Authority and Fairness in Renting Amendment Act of 2022 (D.C. Law 24-115) requires landlords have a current rental housing business license to file an eviction case. This makes the risk of license suspension a much stronger tool for DOB to use to incentivize landlords' compliance.

Now that the business licensing function resides in the Department of Licensing and Consumer Protection (DLCP), it is even more important that DOB prepare and produce a memorandum of understanding explaining how it will work with DLCP, both to take enforcement action related to business licenses and collect data on these outcomes.

DOB could also partner with the Rental Accommodations Division (RAD), which approves rent adjustments for rent controlled properties, to require noncompliant landlords to make repairs before they are allowed to increase rents on units with confirmed housing code violations. The current law already prohibits landlords of rent-controlled properties from increasing rents when housing code violations are present, but this law often goes unenforced because the burden is on tenants to file tenant petitions to challenge increases, not on landlords to prove compliance.¹⁹ DOB's Office of Strategic Code Enforcement could advise RAD of rent-controlled properties with unresolved NOI's such that RAD declines to approve any adjustment in rent until the NOI is resolved.

¹⁷ DOB currently contributes the largest share of agency filings at the Office of Administrative Hearings. See Office of Administrative Hearings, Performance Oversight FY 2022-2023 Pre-Hearing Responses. OAH must be sufficiently resourced so that it may work through its reported backlog of 5,715 DCRA cases. See *id.*

¹⁸ See District of Columbia Office of the Inspector General, "Department of Consumer and Regulatory Affairs: Civil Infractions Program Lacked a Strong Internal Control Environment" (May 2019).

¹⁹ See D.C. Code § 42-3502.08(a)(1).

DOB Needs to be More Accessible and Accountable to Tenants

With the dissolution of DCRA, tenants report being confused about who to call and how to get help with housing conditions concerns. A tenant reported trying to call DCRA's old number and being confused and frustrated by an automated message about contacting DOB. Rather than carry over existing, ineffective systems, DOB needs business processes designed around making the agency easily accessible to tenants.

Keeping Tenants Informed at Every Step of Enforcement Should be Part of DOB's New Business Process

Tenants continue to report not being informed of enforcement actions after contacting DOB about conditions issues. The Council should ensure that DOB's business process analysis and reengineering assessment, deliverables required by the DOB Establishment Act, include regular notification to the complaining tenant at each step of the enforcement process beyond the initial inspection. This must include informing the tenant of the opportunity to present evidence of current housing conditions when an NOI is before the Office of Administrative Hearings for an evidentiary hearing.

DOB's Resources Are Not Accessible to Non-English Speakers

DOB's services remain inaccessible for tenants who are limited- or non-English proficient (LEP and NEP). DOB's main phone line has a pre-recorded message that is only in English, with no menu options for assistance in Spanish, Amharic, or any other non-English language commonly spoken in the District. Similarly, DOB's online customer service and inspection request forms are exclusively in English; clicking the button on the page to translate the form into Spanish does not actually change the content of the form.²⁰ Making DOB services accessible to LEP and NEP residents must be explicitly addressed in DOB's business process analysis and reengineering assessment, as well as in its information technology needs assessment.

DOB Must Have a Greater Presence in the Courts and Community

Legal Aid's experience representing tenants facing eviction suggests that the overwhelming majority also have repair needs in their unit and in many cases substantial housing code violations. Yet tenants without a lawyer typically do not raise these issues or get relief when they are in court. DOB's placement of one housing inspector in the

²⁰ See, e.g., Housing Inspection and Property Maintenance Request Form, *available at* https://dcra.kustomer.help/en_us/contact/request-for-inspection-form-SkHyBRJBv.

Housing Conditions Calendar of the D.C. Superior Court has greatly facilitated tenants' access to quality inspections by an experienced DOB employee and has equipped the Court with critical expertise to assist judges in monitoring landlords' completion of needed repairs.

The model of attaching an inspector to the Court should be expanded to the Landlord and Tenant Branch. The Council should reintroduce legislation requiring DOB to attach inspectors to both the Housing Conditions Calendar and the Landlord and Tenant Branch.²¹ In the last few years, we have observed the impact that placing Emergency Rental Assistance Program (ERAP) providers in the Landlord and Tenant Branch has had in helping tenants avoid eviction and giving the Court real-time information about a pending ERAP application or payment. Attaching housing inspectors to the Court could have a similar impact in facilitating tenants' raising of housing code violations defenses; obtaining inspections, repairs, and settlements or payment arrangements; and providing the Court with valuable information at a critical juncture in the eviction process.

Better still, DOB could place its inspectors even further upstream in the eviction diversion process by utilizing ward- and neighborhood-specific enforcement teams and liaisons in neighborhoods with the highest need for housing code inspections and violation abatement. Legal Aid has observed how poor housing conditions are used as a tool of displacement and contribute to the deterioration or elimination of existing affordable housing through deliberate neglect and tenant turnover.²² Having inspectors or liaisons act as direct points of contact in the community will allow DOB to see patterns and trends in violations at a grassroots level to better prevent displacement and preserve affordable housing. Having this presence in the community will also help DOB slowly rebuild trust and credibility with the public that was lost by DCRA.

Conclusion

Thank you for this opportunity to testify about our concerns and recommendations. DOB, without changes in its leadership or strategic enforcement, will simply replicate the failures of DCRA. We look forward to working with members of the Committee, staff, and other advocates to continue to monitor DOB and hold it to a high standard in the key

²¹ See the Tenant and Homeowner Accountability and Protection Amendment Act of 2019, Bill 23-0394.

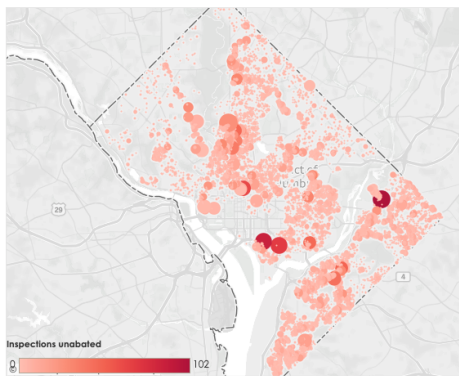
²² See D.C. Council, Committee of the Whole, Written Testimony of Eleni P. Christidis, "Performance Oversight Hearing Regarding the Department of Consumer & Regulatory Affairs" (Feb. 24, 2022).

areas of violation abatement data accuracy; tracking of enforcement outcomes, utilization of enforcement tools, and coordination with other agencies; and greater accessibility to and inclusion of tenants in DOB's business operations.

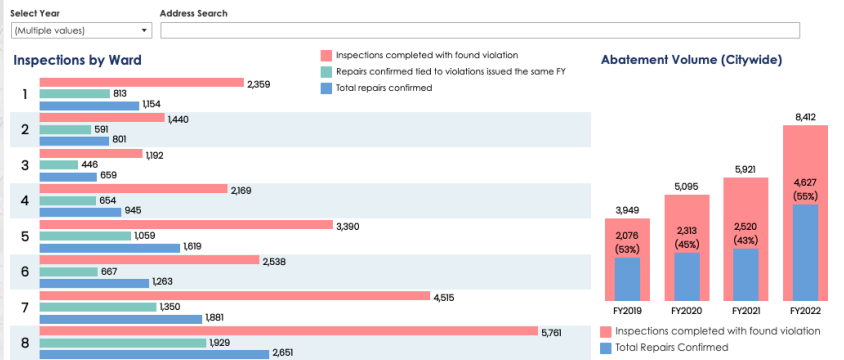
Attachment 1: Screenshot of DCRA Dashboard showing “Total Repairs Confirmed” measure.

		Q1	Q2	Q3	Q4	FY2019 Total	Q1	Q2	Q3	Q4	FY2020 Total	Q1	Q2	Q3	Q4	FY2021 Total	Q1	Q2	Q3	Q4	FY2022 Total
Construction Inspections		5,805	6,603	6,539	6,632	25,579	6,887	7,094	6,651	6,661	26,593	6,954	6,841	6,739	6,396	26,929	6,346	6,821	7,064	6,848	26,679
Housing Inspections		2,256	1,971	1,909	1,451	7,587	1,170	1,096	1,254	2,240	5,760	2,177	2,066	1,579	1,898	7,720	2,496	2,990	2,969	4,973	13,448
Complaint-Based		866	934	938	1,319	4,057	1,016	875	1,014	1,494	4,399	2,590	3,026	3,383	3,232	12,231	3,121	3,705	4,316	2,750	13,892
One/Two Family Rental		943	1,353	1,286	1,353	4,935	2,037	2,181	1,528	1,766	7,512	2,114	2,753	2,535	2,443	9,845	2,760	3,177	2,995	2,466	11,398
Proactive		4,065	4,268	4,133	4,123	16,579	4,223	4,152	3,796	5,500	17,671	6,881	7,845	7,497	7,573	29,796	8,377	9,872	10,300	10,189	38,738
Sub-Total		4,065	4,268	4,133	4,123	16,579	4,223	4,152	3,796	5,500	17,671	6,881	7,845	7,497	7,573	29,796	8,377	9,872	10,300	10,189	38,738
Illegal Construction Inspections		885	586	796	780	3,047	857	991	1,402	1,934	5,184	1,522	1,354	1,389	1,325	5,590	1,169	1,321	1,271	1,151	4,912
Vacant Property Inspections		1,286	1,645	2,188	2,488	7,587	1,630	1,480	2,123	2,909	8,142	1,578	1,342	1,994	2,381	7,285	1,699	1,546	2,496	2,418	8,159
Grand Total		11,841	13,082	13,636	14,223	52,792	13,597	13,717	12,972	17,304	57,590	16,835	17,382	17,619	17,674	69,610	17,591	19,380	21,311	20,406	78,488

Housing Code Inspections

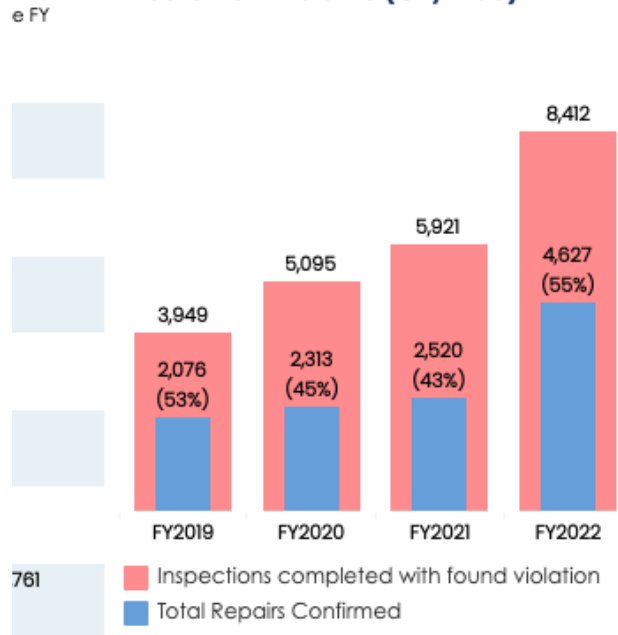


Housing Inspections are designed to ensure landlords make necessary repairs to make residential units habitable. The map on the left highlights the location and number of inspections where violations were found. It also details the inspections where violations were abated. The size of each bubble represents the density of inspections where violations were found. For the address search, please enter the partial address or street number of the building you're trying to find, hit ENTER, and then select from the drop-down list.

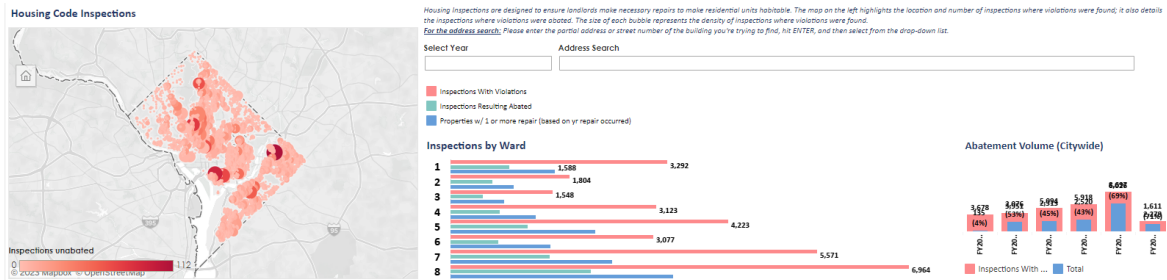


Landlord Violations Tool

Abatement Volume (Citywide)



Attachment 2: Screenshot of DOB Dashboard (pre-February 15, 2023) showing “Abatement Volume (Citywide)” measure.



Landlord Violations Tool

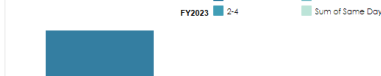
The tool below allows users type in an address or the name of a landlord in order to see if the property has any unaddressed housing violations. The data in the table gets updated on a weekly basis. Data was last refreshed On 2/14/2023

Rental Property/Landlord Search

* Landlords: If steps have been taken to fully correct a violation and the information shown is incorrect, please provide proof of abatement or request a re-inspection to confirm abatement

Owner	Violation Address	Unit	Cap ID	Inspection Date	Original Fines	Floor	Location	Violation
1 PETWORTH HOLDING LLC	4717 3RD PL NW	Common	22NOE-ING-00547	5/30/2022		Null	Common hallway	12-G DCMR 7 704.1.3 Failure to keep all required portable fire extinguishers maintained in an efficient and safe operating condition ...
		Exterior	22ENF-HOUS-04576	4/25/2022	\$2,768	Interior	Entrance foyer	12-G DCMR 7 702.6 Failure to have a means of egress indicated with approved 7E4X7 signs as required by the Building Code 1107 1
		Exterior	22ENF-HOUS-04576	4/25/2022	\$554	Interior	Common hallway	12-G DCMR 5 305.3 Failure to maintain interior surfaces in good, clean, and sanitary condition and good repair 554 30
1ST PRINCIPLE INSURANCE LLC	2731 ONTARIO RD NW	Exterior	22ENF-HOUS-04578	4/25/2022	\$554	Exterior	Front of building	IPMC § 701.2 Failure of owner of the premises to provide and maintain code compliant fire safety facilities and equipment 2214 1
		2	21UNIT-ING-004157	9/8/2021	\$4,236	Interior	Sleeping Room	12-G DCMR 5 704.2 Failure to maintain sidewalk, walkway, driveway, stairs or similar area free of hazardous conditions 554 30
		5	21UNIT-ING-004160	9/8/2021	\$8,472	Basement to 1st	Apartment Entrance Door	12-G DCMR 5 702.3 Failure to install or maintain single- or multiple-station smoke alarms in Group I-1 and R occupancies, and dwellin...
		Common	21UNIT-ING-004155	4/23/2021	\$5,401	Interior	Entire Unit	12-G DCMR 5 310.2 Failure to make all means of egress doors readily openable from the side from which egress is to be made without the n...
					Exterior	Basement Areaway	IPMC § 601.2 Failure by owner to provide or maintain the required mechanical and electrical facilities 2059 1	

Illegal Constructions Response



Inspections across the 8 Wards in FY2023

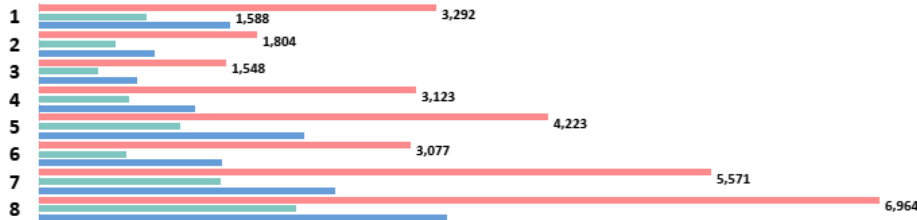


Third Party Inspections

Construction Inspections	DOB Third Party Oversight

- Inspections With Violations
- Inspections Resulting Abated
- Properties w/ 1 or more repair (based on yr repair occurred)

Inspections by Ward



Abatement Volume (Citywide)

