



MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council
c/o Natawna Austin, Executive Secretary

From: Alice Kennedy, Acting Housing Commissioner



Date: April 12, 2023

Re: City Council Resolution 22-0129R - Informational Hearing - 311 Requests for Tenants Facing Chronic Mold

The Department of Housing and Community Development (DHCD) has reviewed City Council Resolution 22-0129R for the purpose of inviting the Commissioner of the Department of Housing and Community Development, the Executive Director of the Housing Authority of Baltimore City, the Health Commissioner, the head of Baltimore City's 311 Services, and other interested parties to appear before the City Council to discuss the number of 311 requests received from tenants facing chronic mold problems in their homes, the number of complaints from tenants of public housing and the number from tenants of private landlords, the demographics of those making the complaints, if known, how such requests are managed, and how the City can better address and respond to reports of chronic mold in housing.

Interior environmental quality is an important component of achieving healthy homes, and interior mold spores may negatively impact a family's health and physical housing structure. DHCD is in support of the Council's efforts to learn about City agencies' current strategies to address mold in owner-occupied and rental housing, how such requests are managed, and how the City can better address and respond to reports of chronic mold in housing. The Resolution calls for several data points, some of which are not tracked directly or easily distinguishable from other complaints.

An analysis of 311 data requests going back to September 2018 found 4,794 requests with comments that include the word 'mold,' 38 of which stemmed from HABC-owned properties. That's an average of around 1,043 per year for all mold-related SRs. Around 8 per year for HABC-owned properties. This is not a precise analysis, primarily because the address field in the 311 data does not always correspond to the address data in our RealProperty table which is where we find HABC-ownership. Also, querying for items that include the word 'mold' might also include comments around 'molding' or other items not directly related to mold. Additionally, 311 does not track the demographics of those making complaints.

DHCD's Division of Housing Code Enforcement & Emergency Operations works to maintain safe and attractive neighborhoods throughout the city. DHCD's Code Enforcement Division Inspectors enforce the city's housing, zoning, building and related codes through the issuance of notices and citations. Inspectors may observe the "appearance of mold" during site

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visits and issue a notice to the property owner for the conditions causing the mold. We do not cite for mold and mold is not currently a violation in City or State Code. We cite for sanitation violations when we see “appearance of mold” or similar substance on a surface.

Housing Code Enforcement Inspectors do not test for the presence of mold, they advise the property owner to address the cause. For instance, we may cite for: defective ventilation, leaking pipes, defective walls or ceiling if there are water stains, poor roofing conditions, basement ground water infiltration and other common causes of mold growth in housing. Residents can report mold via the 311 system. Unless the “appearance of mold” can be seen from the outside of the property inspectors need to coordinate with the tenant or property owner to gain access to the building. Individuals reporting mold or other structural defects are encouraged to leave full and complete contact information.

DHCD’s Division of Homeownership & Housing Preservation offers programs to assist owners of eligible owner-occupied properties with repairs which may address underlying issues causing mold. The Weatherization Assistance Program, not only improves energy efficiency and lowers utility bills but makes homes safer by addressing health and safety issues in the home such as mold and asbestos. These interventions are funded by dedicated health and safety funds that are included in weatherization grant funding from State and Federal sources.

The Division’s Lead Hazard Reduction Program (LHRP) and Office of Rehabilitation Services (ORS) also assist residents in addressing the root cause of mold in their home. ORS provides loans and grants as funding allows, to pay for the removal and replacement of building materials that display mold and, in some cases, can provide testing. LHRP can address mold in homes receiving lead hazard reduction intervention by utilizing HUD Healthy Homes dollars. This is a limited amount of funding that is received in conjunction with the City’s Lead Hazard Reduction Grant from HUD. These grant funded health and safety, and healthy homes dollars are often not enough to fully cover all the health and safety issues we observe in the homes receiving weatherization and lead hazard reduction services and, in some instances, mold will not be able to be addressed due to lack of available funds.

Loans and grants to perform repairs on properties can be used to address mold and other internal environmental issues, but often mold is being caused by another underlying root cause such as a roof leak or plumbing leak, or improper ventilation. Funds can be used to address the underlying issue, and if funds are available, will also be used for mold testing and remediation. Addressing these root causes can reduce the instances of the presence of mold in homes, and promote healthy and sustainable housing. The Division’s LIGHT Intake and Assessment unit manages a single application process for all the programs and can provide applications for residents seeking assistance.

DHCD **does not object** to the passage of City Council Resolution 22-0129R.

AK:sm



cc: Ms. Themelis, Nina, *Mayor's Office of Government Relations*