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cooperate with landlords during infestation treatments.

"It is generally the case that most of the costs associated with the infestation are born by the owner," Jones says. "This is only for the possibility that an owner finds a hostile or uncooperative tenant who does not want to cooperate at all. Just as it takes two to tango, it takes two to eliminate bed bugs."

But Gramlich thinks the notice is "potentially very harmful to residents," and thinks it may deter them from reporting they have an infestation.

In response, Gramlich says the National Housing Law Project intends to organize various Legal Aid offices and other legal clinics serving low-income people in urging HUD to reinstate the language from the August notice.

Elisa Harrigan, the executive director of the Community Alliance of Tenants, says it's hard to tell exactly what the obligations and expectations of tenants are in the new notice. "It's so vague and so new that we don't know the legal implications," she says.

Ben Duncan, a Multnomah County Environmental Health program specialist and the coordinator of the county's Bed Bug Task Force, agreed. But he and others worry that the notice will have the unintended consequence of causing tenants to not report that they have bed bugs in their unit, in order to avoid paying the steep costs of treatment.

That, he said, would negatively impact the efforts to reduce bed bugs throughout the county. "Everybody knows that early response and appropriate communication between the landlord and the tenant is critical to controlling and mitigating bed

bugs," Duncan says. "Any time you have a deterrent for tenants to report, it's going to have a negative impact."

Since bed bugs began infesting hotels, apartment complexes, and other buildings in Portland and other cities throughout the country two years ago, low-income housing providers have taken aggressive steps to reduce infestations.

Roger Moore, assistant director of property management for Home Forward (formerly known as the Housing Authority of Portland), says the agency has used two different types of bed bug sniffing dogs, a cryogenic freezing unit, chemical treatments, cedar oil, steam treatments, getting rid of baseboards and sealing cracks and crevices in apartments, doing yearly inspections, and even giving residents quarters to encourage them to do their laundry more often.

The shotgun approach has worked. "We have seen dramatic decreases in the amount of bed bugs," he says, guessing the numbers have gone down between 60 and 70 percent. "We have invested a lot of time and resources into this. We're not going to find a silver bullet."

But he says the most important component of treatment is getting residents to report they have bed bugs in their unit. "You have to get residents to report," he says. "The longer bed bugs stay in a unit, the more they multiply, the harder they are to get rid of, and the more costly it is."

Adrienne Karecki, Central City Concern's Director of Social Enterprises and Employment Services, says a great deal of stigma still exists in the minds of Central City Concern's residents despite efforts to educate them about bed bugs and encourage them to report infestations. "They think it's an embarrassing problem," she says.

She refers to the work Central City has done to reduce bed bugs as "a process."

Tenants are more receptive than they have been in the past, and she says, "If the tenants work with us ... we can significantly reduce and get rid of the bed bugs."

Both she and Moore say tenants have been cooperative when dealing with treatments, which can take months and cost tens of thousands of dollars.

Moore says that, on average, the tenants in Home Forward's high-rise buildings — where bed bug infestations are the worst — earn 19 percent of median family income, or a little over \$8,000 a year for one person.

In his mind, it's ludicrous to charge tenants for any part of the bed bug treatment, not only because they are unable to pay for it, but also because it can never be known if that tenant brought bed bugs into the unit in the first place.

"We want to help residents as much as possible," he says. "We wanted to take away as many of the barriers as possible. We found that it was so much cheaper for us in the longrun if they would report in a timely manner rather than waiting."

If tenants knew they had to pay for all or some of the cost of treatment, Moore predicts they would simply "live with the nuisance of bed bugs."

Karecki also says Central City does not charge residents for the cost of the treatment. "They just couldn't pay," she says. "It would be a pretty huge barrier."

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— ROGER MOORE
ASSISTANT DIRECTOR OF PROPERTY
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