



Wednesday, February 1, 2023

**Re: 2205 23-00389**

Members of the House Health Finance and Policy Committee,

Housing First Minnesota offers the following comments and concerns on 2205 23-00389 (Rep. Jordan). Housing First Minnesota is a statewide organization representing firms involved in all aspects of the housing industry, including the general contractors, subcontractors and suppliers engaged in the renovation of pre-1978 homes intended to be subject to the Minnesota Department of Health's (MDH) RRP Rule governing the renovation and repair when lead paint is present.

Our comments are rooted in the belief that housing must be accessible, safe and affordable. The dangers and health effects of lead dust exposure are well understood by our organization and not disputed. This is particularly true for industry members who face exposure every day in their renovation activities. The best way to protect Minnesotans from lead paint exposure during the renovation of pre-1978 homes is to ensure that any lead paint program ensures remodeling is done by licensed contractors remains safe and affordable.

From an industry practitioner's perspective, MDH's proposed RRP Rule remains unworkable after more than six years of development. Its current form remains unworkable, and more development would be needed by MDH before it can proceed for necessary stakeholder evaluation. While imperfect, the current EPA's RRP program is well-established, and the industry is trained and familiar with its requirements.

Standing apart from nearly every other state that has assumed local enforcement of the RRP program, Minnesota has chosen not to adopt the federal RRP rule by reference. As the EPA's version is the established industry standard, Housing First Minnesota believes the EPA should retain custody of this health and safety rule.

Given the concerns regarding the unfinished work at MDH related to the local adoption of the EPA's RRP Rule, this bill is premature. Housing First Minnesota is committed to working with the bill author and MDH once a workable version of the proposal has been presented.

Sincerely,

Nick Erickson  
Senior Director of Housing Policy  
Housing First Minnesota

