



Thursday, March 24, 2022

Re: HF 3873 (Jordan)

Members of the House Health and Human Services Committee,

Housing First Minnesota offers the following comments and concerns on HF 3873 (Jordan).

Housing First Minnesota is a statewide organization representing firms involved in all aspects of the housing industry. This includes 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 are well understood by our organization and our members, particularly those that face exposure every day in their renovation activities.

From an industry practitioner's perspective, MDH's proposed RRP Rule remains unworkable after more than five years and more work is needed by MDH before the RRP Rule can proceed. Further, stakeholder engagement on the rule has often been lacking and often initiated only through the request for meetings by stakeholders. Lastly, we have often struggled to get clarification on MDH's interpretation of the rule.

HF 3873 is a necessary step in the process to adopt its own RRP rule and has been initiated without stakeholder engagement from MDH. Given the concerns regarding the unfinished work at MDH related to the local adoption of the EPA's RRP Rule, HF 3873 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,

A handwritten signature in blue ink, appearing to read "Nicholas Erickson".

Nicholas Erickson
Director of Research and Regulatory Affairs
Housing First Minnesota

