



September 15, 2016

Office of the General Counsel
Department of Public Health
250 Washington Street
Boston, MA 02108

Re: Comments on Proposed Amendments to 105 CMR 460.000: Lead Poisoning Prevention and Control

Submitted Via Email to Reg.Testimony@state.ma.us

Dear Sir or Madam:

The Massachusetts Association of Community Development Corporations (MACDC) is pleased to submit these comments on proposed amendments to 105 CMR 460.000: Lead Poisoning Prevention and Control.

MACDC was established in 1982 and serves as the capacity building and advocacy arm of the community economic development movement in Massachusetts. We are an association of 89 mission-driven community development organizations dedicated to creating places of opportunity where all people can live with dignity while participating in and benefiting from our Commonwealth's economy. Several MACDC Members administer programs to address the serious public health hazards posed by lead paint.

Despite the Commonwealth's longstanding commitment to deal with lead paint hazards, only about 10% of homes in MA built prior to 1978 have been reported as inspected and deleaded, and the MA Department of Public Health (DPH) regulations have not been fully reviewed and updated since 2000. The comprehensive approach proposed in the amendments will bring the regulations in line with the current science on lead poisoning, more thoroughly identify children at risk, and increase the focus on the appropriate treatment of surfaces most critical to addressing the problems.

While MACDC values the full spectrum of amendments proposed, we particularly support the redefinition of lead poisoning to a Blood Lead Level (BLL) of 10 ug/dL, consistent with the recommendations of the Medical Review Panel and the Governor's Advisory Committee. We further support the establishment of a blood level of concern as a BLL of 5-9 ug/dL, which would extend voluntary services to more families.

We recognize that changing the definition of lead poisoning which will result in enforcement measures impacting more children and more properties, and the lowering of the blood level of concern creating the need for additional services, will be accompanied by an increased need for financial resources. We urge the Commonwealth to aggressively pursue all available state and federal funding resources.

We furthermore urge the Administration to advocate with the MA Legislature for additional funding for the Commonwealth's Get the Lead Out Program, so that DPH, the MA Department of Housing and Community Development (DHCD) and MassHousing have the resources to meet what will be an increasing demand on these resources. We offer MACDC's support in those advocacy efforts.

If you have any questions about our comments, please feel free to contact me at 617-379-5922 or at joek@macdc.org, or contact MACDC Senior Policy Advocate Don Bianchi at 617-379-5926 or at donb@macdc.org. Thank you for your efforts to aggressively attack the scourge of lead paint, and for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Kriesberg". The signature is stylized and cursive.

Joe Kriesberg, President and CEO

Cc: Paul Hunter, MA Department of Public Health
Don Bianchi, MACDC