

March 1, 2022

LORC and City Staff,

Thank you for including a separate agenda item to foster discussion at the March 2, 2022, LORC virtual meeting on lead paint dust removal options. As we mentioned to Heather Bailey, we are planning to testify and hope to have a collaborative discussion with you at that 2nd part of the meeting.

We're appreciative of the alternative language in the March 2022 Chapter 41, 41.33 STANDARDS FOR ALTERATIONS (1) General, (e) lead paint, which (as the Staff Report notes) reflects an approach similar to that of Baltimore's Commission on Historic and Architectural Preservation (CHAP). The openness to allowing the option to replace windows and other features due to persistence of lead appropriately prioritizes public health. As CHAP staff have emphasized, this approach paves the way to increased community trust and improved relationships with local vendors, both of which help strike a balance between eliminating lead hazards and preserving historic character.

We recognize that, in some scenarios, tax credits might not be available for window replacement due to presence of lead. We support language indicating this possibility, and, following the Baltimore CHAP model, suggest that it could be effectively handled by coordinating dialogue among homeowners, LORC staff, and state and federal reviewers, to ensure safe lead-hazard reduction as well as adherence to the standards set by the Secretary of the Interior, HUD, and the EPA.

As mentioned in earlier notes, the Baltimore CHAP would be happy to consult with LORC and city staff on this and related issues.

We look forward to the March 2 discussion on allowing a window-replacement option in the demonstratable presence of lead.

Josh Garoon
Jim Murphy