



Council of Large Public Housing Authorities

455 Massachusetts Avenue, NW, Suite 425

Washington, DC 20001-2621

Executive Director: Sunia Zaterman

phone: 202.638.1300 | **fax:** 202.638.2364

web: www.clpha.org

December 3, 2019

The Honorable R. Hunter Kurtz
Assistant Secretary for Public and Indian Housing
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, D.C. 20410

Dear Assistant Secretary Kurtz,

We write to express our concerns regarding the letter that PIH sent to PHA Executive Directors on November 22 concerning the recent coverage of radon in public housing. This letter overstates HUD's previous guidance on PHAs' obligation to test for radon and underscores HUD's failure to provide the level of funding necessary for PHAs to fully ensure the health and safety of their residents.

Your letter misrepresents the contents of PIH notice 2013-06, issued on February 4, 2013. The purpose of the notice is to "provide information to PHAs on the dangers of radon," and it describes EPA recommendations for mitigation. While the notice encourages PHAs to test for and mitigate radon, this language does not state in any way that PHAs have an "obligation" to test for radon. Instead, the notice provides an indication that more action from HUD on radon will be forthcoming by stating that the "Department will continue to examine ways that radon and mitigation testing may be incorporated into HUD-assisted housing program requirements."

Rather than taking further action on this issue, HUD has been completely silent on radon testing and mitigation since the 2013 notice. In fact, current REAC standards do not include any testing of radon for public housing properties. And as you are aware, HUD recently sought public comment on the details of its National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration, which will test a new inspections protocol for the public housing and multifamily programs. The demonstration, which emphasizes health and safety issues, does not include or mention radon in the proposed standards.

HUD's actions on critical funding for public housing maintenance and repairs is utterly inconsistent with the Department's claims that health in housing is a "premier priority." Your most recent budget request for FY 2020 that proposed zeroing out the Capital Fund would only exacerbate PHAs' challenges in ensuring resident health and safety, and it is fortunate that Congress rejected this draconian proposal in favor providing the funding that PHAs and their residents deserve.

Thank you for considering our concerns regarding your recent letter. We look forward to your response.

Sincerely,

A handwritten signature in black ink, reading "Sunia Zatterman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sunia Zatterman
Executive Director