



February 29, 2024

The Honorable Marvin Abney  
Chairman  
House Committee on Finance  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

***Re: H 7225 Article 3, Section 17—Statewide Mandatory Lead Registry***

Dear Chairman Abney and Committee Members:

On behalf of the more than 6,000 members of the Rhode Island Association of REALTORS® (RIAR), I thank you for affording our association the opportunity to comment on the above-referenced budget article.

As homeowners, homebuyers, and REALTORS®, it is critical for all stakeholders to play a role in protecting the health of families purchasing and renting homes in Rhode Island. RIAR will continue working with elected officials on practical policies that keep Rhode Islanders healthy and safe while protecting Rhode Island's real estate market and homeowners.

RIAR is concerned about some of the public policies that have been considered by the General Assembly recently. These proposals and policies would not only harm Rhode Island's real estate industry but reduce the availability of housing in our state. That is why RIAR, for the following reasons, strongly supports the Governor's proposal to create a more viable solution to creating a lead registry in Rhode Island.

***Costs of Remediating Lead in Older Homes***

The cost of housing in Rhode Island has increased considerably in recent years. According to the HousingWorksRI 2023 Fact Book, the statewide average for a 2-bedroom apartment is \$1,996.<sup>1</sup> This represents at least one-third of Rhode Island's households who are cost-burdened. ***Should lawmakers contribute to the state's housing crisis by advocating policies that create unfunded mandates for struggling homeowners, while further intensifying the cost of rent in Rhode Island?***

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<sup>1</sup> <https://d337wih8hx5yft.cloudfront.net/documents/Housing-Fact-Books/2023HFB.pdf>

RIAR agrees with the Governor that moving the effective date of the lead registry to September 1, 2025 affords homeowners time to manage the costs of securing a lead-safe certificate from a licensed lead inspector. Without time and resources to remediate lead in older homes, RIAR is concerned that these exorbitant costs will be passed on to tenants, further exacerbating the rental crisis in Rhode Island.

The proposal also allows time for state government to implement programs that assist homeowners in making these necessary repairs. RIAR recommends the creation of a revolving loan fund program with a zero percent interest rate for resident homeowners and affordable housing landlords. Programs like the Providence Water 0% interest 10-year loan is just one example that could be replicated and provide resources and solutions to homeowners that would otherwise shoulder enormous financial burden. The chart below provides the average cost of replacing windows in non-historic homes.<sup>2</sup>

Type	Average Cost Using Vinyl	Average Cost Using Wood
Awning window	\$925–\$1,250	\$1,200–\$1,700
Bay window	\$4,750–\$6,000	\$8,000–\$11,000
Casement window	\$1,000–\$1,900	\$1,400–\$3,800
Double-hung window	\$825–\$1,400	\$1,600–\$2,200
Shaped window	\$1,000–\$1,600	N/A
Sliding window	\$800–\$1,300	N/A

Moreover, RIAR has heard from REALTORS® and homeowners regarding the historic district approval process and replacing windows for lead-safe certification. From the cost of hiring architects, to limited window replacement options, the cost and length of process will negatively impact home values and housing affordability.

#### ***Department of Health Data Collection***

A rental registry aimed at creating lead-safe units should only include properties that were built prior to 1978 and do not have a current certificate of conformance on file with the Department of Health. This has been the standard Rhode Island has used for decades, as newer construction is prohibited from using lead-based products during construction. If the state is serious about creating lead-safe homes, reducing the amount of excessive bureaucracy in the Department of Health is a prudent step in achieving the intended goal.

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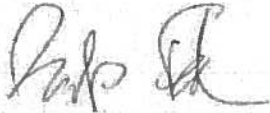
<sup>2</sup> <https://www.usatoday.com/money/homefront/windows/window-replacement-cost/>

***Licensed Lead Inspectors in Rhode Island***

To obtain a lead-safe certification, the current law requires every landlord to hire a state licensed lead inspector. RIAR is concerned that there are only 36 licensed lead inspectors in the State of Rhode Island.<sup>3</sup> How are homeowners impacted if a licensed lead inspector cannot be hired when a certificate of conformance is due at the Department of Health? Will homeowners be held accountable for a shortage of licensed lead inspectors in Rhode Island?

RIAR respectfully asks the House Finance Committee and the House of Representatives to support the proposed budget amendment submitted by Governor McKee and allow homeowners to be part of the solution in keeping families safe in their homes.

Sincerely,



Philip Tedesco  
Chief Executive Officer  
Rhode Island Association of REALTORS®

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<sup>3</sup> <https://health.ri.gov/find/leadinspectors/>