

Ladies/Gentlemen:

I am Todd Knight, as a father of a child that was lead poisoned, a License lead Abatement Contractor, Licensed Lead Risk Assessor, RRP Certified contractor, and Landlord in the city of Cleveland. I believe that I bring a unique perspective to the issues faced by the children, parents, landlords, and lead professionals in the City of Cleveland.

Getting a property lead certified within the HUD guideline, and required by all landlords in the city of Cleveland is a regulation that is far past due. The number of children poisoned by lead in the city of Cleveland is a national embarrassment, a severe burden on their parents, and a significant cause of violent crime, poor health, shortened life expectancy, and tasks our social welfare programs to the brink of failure.

That being said, the lead program run by the building and housing department is poorly run, autocratic, and lacks any accountability to the taxpayers and children it is supposed to protect. They appear to relish in punishing landlords that are trying to comply, and the lead professionals that are working to help them try to make their properties lead safe.

My biggest observation is that the City of Cleveland's lead poisoning problem is truly a problem of its own making. Enforcement is not just lacking but has been completely abdicated. Residential properties with Lead Hazard Control Orders continue to house small children. Building Inspectors routinely drive by and observe properties with failing paint and no enforcement action is taken. I routinely witness properties with LHCO's issued many years ago occupied by small children.

Here are a few addresses with issued LHCO's that I have personally observed small children living in, and reported to the B&H lead department, and yet no action was taken:

6211 Francis Ave.
10702 Columbia
6611 Sebert Ave.
7115 Classen Ave
12409 Watterson Ave.
3348 E 49th St
1253 W. 67th St
3618 W. 49th
3915 Storer Ave

I reported 3672 Martin Luther King Jr Dr. (A house 5 houses from a school) to the B&H lead department and city health department as having severe peeling paint (over 90% of the exterior) at 279000 Mg/Kg of lead content, the paint chips were those that I picked up from the driveway. This is 55.8 times greater than the max threshold of 5000 Mg/Kg per the HUD guideline. I then observed the painting contractor work without any lead safe controls. No action was taken.

Currently the lead program is notifying inspectors and landlords that it may take up to 45 days to get a response on a submitted clearance report. Not only is that roughly 1.5 reports per person per workday, but also a violation of the spirit of the State of Ohio requirement that only allows city personnel 4 days to complete a required permit inspection, or the job moves onto the next step, but we are now allowing city quasi-inspectors to hold up city required inspections for 30 days or more.

House Bill 280 is a good first step, mandating adherence to HUD, ODH, and Ohio laws across municipalities. Such standardization is crucial, particularly when Cleveland imposes daily non-compliance fines of \$200 per unit. A response time of 30 days post-application submission while still unacceptable is better than we have now, and a 180-day window for addressing specified deficiencies.

The bill's tax credit reform would be a significant motivator for landlords to comply. The current non-refundable credits are limited in scope. HB 280's transformation of these credits into refundable ones, accessible to all taxpayers, could spur broader compliance. Considering the legislature's allocation of \$5 million for this initiative, yet less than \$50,000 being utilized, these changes are not just beneficial but necessary.