



## National Association of Housing and Redevelopment Officials

630 I Street NW, Washington DC 20001  
(202) 289-3500 Toll Free: (877) 866-2476  
Fax: (202) 289-8181

April 10, 2023

Department of Housing and Urban Development  
451 7th St. SW, Room 10276  
Washington, DC 20410-0500

Re: Request for Comment: Addressing Radon in the Environmental Review Process  
Federal Register Docket No. FR-6358-N-01

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I am pleased to respond to the request for comments in the above-referenced Federal Register Docket Number.

Formed in 1933, NAHRO represents over 19,500 housing and community development individuals and agencies. Collectively, our members manage over 970,000 public housing units, 1.7 million Housing Choice Vouchers (HCVs), and receive over \$1.5 billion in Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program funding to use in their communities. NAHRO members also frequently utilize the Low-Income Housing Tax Credit (LIHTC) program to develop new affordable housing units across the country. NAHRO has the unique ability to represent public housing agencies, local redevelopment agencies, and other affordable housing developers of all sizes and geography.

HUD has requested comments on Notice CPD-21-136, titled, "Department Policy for Addressing Radon in the Environmental Review Process" including identifying any concerns about implementation of the proposed radon policy. In response, NAHRO offers the following brief comments:

- NAHRO acknowledges the scientific evidence that links high levels of radon exposure to lung cancer and other adverse health impacts. Our members work hard every day to ensure the health and safety of their residents, and we appreciate the Department's ongoing efforts to reduce human exposure to radon and other toxic contaminants in the built environment.
- NAHRO supports exempting certain building types from further radon consideration as defined in the proposed policy.
- NAHRO supports the use of alternatives for considering radon in the environmental analysis other than the ANSI/AARST radon testing standards. Particularly in light of the significant geographical

**Patricia Wells**, MPA, CME, President; **George Guy**, Senior Vice President; **Lucille Boss**, Vice President- Commissioners; **Sharon L. Carlson**, CME, SPHM, PHM, SHM, CRPBRA, CSO-PH, CSEC-PH Vice President- Professional Development; **Irma Gorham**, PHM, Vice President-International Research and Global Exchange; **Duane Hopkins**, Vice President-Budget & Administration; **Milet Hopping**, PHM, Vice President-Member Services; **Peter F. LiFari**, Vice President-Community Revitalization and Development; **Wayne Pollard, Jr.**, Vice President-Housing, **Mark Thiele**, CS-PHM, CME, CMVO, NCC, Chief Executive Officer

e-mail: [nahro@nahro.org](mailto:nahro@nahro.org)

website: [www.nahro.org](http://www.nahro.org)

and financial constraints faced by NAHRO members in rural and other remote areas, professional radon testing can be both difficult to access and cost-prohibitive. Therefore, other strategies for considering radon levels such as the use of do-it-yourself radon (DIY) test kits are appropriate.

- Finally, while not referenced in the proposed policy, NAHRO strongly urges consideration of federal funding to cover the cost of radon testing and any subsequent mitigation measures in connection with the rehabilitation, preservation or development of affordable housing and related community facilities. It is essential that the federal government accelerate efforts to expand affordable housing and provide adequate funding to address all regulatory requirements associated with that goal including the radon requirements detailed in the proposed policy.

The National Association of Housing and Redevelopment Officials thanks the Department for the opportunity to share these comments.

Sincerely,

Eric Oberdorfer  
Director, Policy and Program Development