



Affiliate of The Maryland Association of Counties, Inc.

TO: Members of the Judicial Proceedings and Education, Energy, and the Environment

FROM: Maryland Conference of Local Environmental Health Directors

**RE: SB856 – Mold - Landlord Requirements and Regulations (Maryland Tenant Mold Protection Act)**

The Maryland Conference of Local Environmental Health Directors (Conference) provides this **letter of Support with Amendments** for SB856 in their capacities as the state's twenty-four Environmental Health Directors who carry out delegated authorities from both MDE and MDH. The Conference does support posting information for landlords and tenants on mold and water infiltration. This information should include prevention and abatement of mold from federally recognized sources. Amendments that address the following are suggested:

1. Address the challenges in that no federal standards for acceptable levels of mold exist. Mold is ubiquitous in the environment and, to conduct enforcement under this proposal, acceptable levels will need to be set.
2. Individuals' experience varying impacts from mold exposure from the type of mold to the levels of mold present. It is difficult to set standards that would cover all impacts. Consider focusing on toxigenic/mycotoxin producing species.
3. The Maryland State lab does not have the ability to analyze mold and local inspection authorities, in general, do not have the equipment or experience to test for mold or interpret the results.
4. There is no recommended clearance testing after remediation in this proposal.
5. Minimum livability regulations already require abatement of water infiltration. It would be helpful to prevent mold by strengthening the prevention standards for water infiltration sources. It is also recommended that measurable standards, like relative indoor humidity, be considered.
6. There are over 100,000 species of mold. Only nine genera are identified in the proposed legislation. Clarification regarding when "mold" remediation is needed can be misconstrued to mean that only identification of one of those nine genera need to be removed.

Therefore, the Conference provides a **letter of Support with Amendments** for SB856.

For more information:

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