



Bill Title: Senate Bill 873, Environment - Reduction of Lead Risk in Housing - Modified Risk Reduction Standard

Committee: Senate Education, Energy, and the Environment

Date: March 3, 2026

Position: Unfavorable

This testimony is offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose members consist of owners and managers of more than 214,000 rental housing homes in over 1015 apartment communities. Our members house over 571,000 residents of the State of Maryland. MMHA also represents over 270 associate member companies who supply goods and services to the multi-housing industry.

Under Maryland's Reduction of Lead Risk in Housing law, "Modified Risk Reduction" is a defined set of mandatory, remedial actions that rental property owners must complete within 30 days after receiving notice that a tenant's child has an elevated blood lead level. Current law strikes an appropriate and logical balance. As written in § 6-803 (page 3, lines 1–4), Modified Risk Reduction is triggered only when a child has an elevated blood lead level and "an environmental investigation conducted under § 6-305 has concluded that there is a defect at the affected property." In other words, there must be evidence that the rental property itself contains a lead-related defect before costly remediation is required.

Senate 873 removes that critical environmental investigation requirement. By striking the language requiring a finding of a defect at the property, the bill would mandate Modified Risk Reduction even when there is no evidence that the rental home caused the exposure even when there is no evidence that the rental home caused the exposure.

Increasingly, elevated blood lead levels are linked to sources unrelated to rental housing—such as contaminated soil, water service lines, imported spices, ceramics, cosmetics, toys, or jewelry. In some cases, exposure may occur in another residence or child-care setting. Yet under this bill, the rental property owner would still be required to undertake a full Modified Risk Reduction response, regardless of whether the property was the source.

This is neither logical nor fair. Maryland's current framework appropriately ties remediation obligations to verified property conditions. It ensures that owners act swiftly when a defect is identified, while avoiding unnecessary and costly interventions when the property is not the source of exposure. Eliminating the environmental investigation requirement divorces liability from causation and imposes significant financial burdens on housing providers without advancing targeted public health outcomes.



MARYLAND MULTI-HOUSING ASSOCIATION, INC.

MMHA strongly supports protecting children from lead exposure and supports science-based, evidence-driven enforcement. However, SB 873 removes an essential safeguard in current law and replaces it with a one-size-fits-all mandate untethered from actual property conditions.

For these reasons, MMHA respectfully requests an unfavorable report on Senate Bill 873.

Please contact Aaron J. Greenfield at 410.446.1992 if you have any questions.