

December 30, 2011

Joint Committee on Tax Credits
c/o Joe Erdelyi, Director of Development
Vermont Housing Finance Agency
PO Box 408
Burlington, Vermont 05401-0408

Dear Mr. Erdelyi,

We, the undersigned, strongly recommend that the Vermont Joint Committee on Tax Credits (JCTC) amend the Qualified Allocation Plan (QAP) by adding 100% smokefree building policy to the 2012 evaluation criteria. Given the known negative health impacts of secondhand smoke exposure, we encourage the committee to assign it as a Top Tier Priority.

According to the U.S. Surgeon General, there is *no risk-free* level of secondhand smoke exposure¹. The American Society of Heating, Refrigerating and Air-Conditioning Engineers has stated that no ventilation can completely eliminate toxins from secondhand smoke; it seeps into adjoining units through shared walls, ductwork and ventilation systems².

The number one complaint the American Lung Association receives nationwide is secondhand smoke exposure in multi-unit homes. Unfortunately, our most vulnerable populations, children and the elderly (especially those with chronic disease) often don't have a voice or a choice in dwelling.

For example, a 2010 University of Rochester study³ of more than 5,000 children found that apartment-dwellers had a 45% increase in a marker for tobacco smoke exposure (serum cotinine) compared with kids who lived in detached houses. They also found the marker highest in children under 12, those who were black, and those living under the federal poverty level.

Despite the fact that fire-safe cigarettes are required in most states including Vermont, they aren't fire proof. Fires started by smoking materials killed three people in 2009-2010 in Vermont.

The JCTC has a tremendous opportunity in Vermont to create healthy, safe and clean homes for those seeking affordable housing and to implement a cost-effective policy for owners/developers wishing to reduce maintenance costs and possibly property insurance. If you have questions, please contact Rebecca Ryan, Director, Health Promotion and Public Policy, American Lung Association in Vermont, 876-6862 or rryan@lungne.org.

Sincerely,

Vermont Low Income Advocacy Council, Vermont Head Start Association, Northeastern Vermont Regional Hospital, Vermont Public Health Association, Vermont Tobacco Evaluation and Review Board, Coalition for a Tobacco Free Vermont, American Heart Association, and the American Lung Association in Vermont.

¹ The Health Consequences of Secondhand Smoke: A Report of the Surgeon General, June 2006.

² The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), June 2005.

³ *Tobacco-Smoke Exposure in Children Who Live in Multiunit Housing*, Karen M. Wilson, MD, MPH, et al, Pediatrics, Published online December 13, 2010.