

August 30<sup>th</sup>, 2017

Anne Soiza  
Assistant Director  
Division of Occupational Safety and Health  
Washington State Department of Labor and Industries

RE: Proposed DOSH Lead Rule

Dear Ms. Soiza,

The Alliance for Gun Responsibility strongly endorses the intent of the proposed draft rule released on 29 June 2017 by the Division of Occupational Safety & Health regarding improvements to Washington State standards for lead mitigation in the workplace. Our organization represents tens of thousands of Washingtonians committed to a public health approach to reducing gun violence here in Washington State. It is that commitment to public health and safety that drives our support for strengthening our state's standards to reduce the threat of lead poisoning, of which standards for regulated gun ranges are an important component. The Alliance applauds the State of Washington for its leadership on making evidence-based improvements in this critical area.

State leadership in this matter is timely and appropriate. As *The Seattle Times* reported in its 2014 series "[Loaded with Lead](#)", the danger of lead exposure at commercial gun ranges is a national challenge that has acutely impacted Washington State. During a decade in which thousands of American workers have been exposed to unsafe levels of lead while working or shooting at commercial gun ranges, Washington State experienced the single-worst incident of occupational lead contamination at a gun range in American history. This 2012 incident is emblematic of a systemic problem in Washington State. Of the commercial ranges in Washington State inspected by authorities between 2004 and 2013, ninety percent were found to have at least one lead violation, despite infrequent inspections by state authorities.

But lead poisoning, and our interest in preventing it, is not limited to gun ranges. Workers in many sectors, consumers, first responders, children, families, and communities all deserve a safe and healthy environment, and everyone is threatened with permanent harm when contaminated by lead. Children and pregnant women, many who are contaminated by take-home lead from a family member's workplace, are particularly vulnerable to devastating developmental effects from lead poisoning. Yet lead exposure continues to be a threat in commercial and residential spaces, often and unfairly resulting in greater adverse health effects for communities of color and low-income populations.

There is no safe level of lead exposure, but federal rules written many decades ago have not yet adjusted to this reality. Washington State has an opportunity to lead the way in rectifying this situation, and we look forward to continuing to speak out in support of a strong rule as the process continues.

Very best,

Renee Hopkins  
Alliance for Gun Responsibility