

Campaign for Lead Free Water • Childhood Lead Action Project  
Clean Water for North Carolina • Environmental Transformation Movement of Flint  
Flint Democracy Defense League • Flint Rising  
Freshwater For Life Action Coalition – MKE • Get the Lead Out Coalition – MKE  
LEAD716 • Little Village Environmental Justice Organization  
Parents for Nontoxic Alternatives • Portland Advocates for Lead-free Drinking Water  
Ward & Public Schools Parent Organization • Water Alliance • Water You Fighting For  
Women for a Healthy Environment - Get The Lead Out PGH

December 2, 2019

Acting Director Jennifer McLain  
Office of Ground Water and Drinking Water  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Mail Code: 4601M  
Washington, DC 20460

Re: Comment period extension request for proposed rulemaking – National Primary Drinking Water Regulations: Lead and Copper Rule Revisions – **Docket ID No. EPA-HQ-OW-2017-0300**

Dear Director McLain,

With this letter, our coalition of grassroots groups working across the US to protect human health from environmental contaminants is requesting **public hearings** and **an extension on two public comment periods** pertaining to EPA’s proposed Lead and Copper Rule (LCR) revisions.

Our coalition brings over a decade of expertise, research, and activism on lead in drinking water and has played a leading role in urging EPA to update the LCR in order to provide improved public health protection. Fully aware of:

- a. The significant but underestimated public health risk of lead in drinking water to all – especially to our fetuses, infants dependent on reconstituted formula, and young children;
- b. The LCR’s unique “shared responsibility” regime that renders us, water users, responsible for assisting water utilities with regulatory compliance processes and for protecting ourselves, our families, and our communities from lead-in-water exposures in our homes, schools, workplaces, and public spaces; and
- c. The unending chain of lead-in-water crises in our cities, including Chicago, IL; Flint, MI; Newark, NJ; Pittsburgh, PA; Portland, OR; and Washington, DC;

we cannot overstate our interest in providing comments on the EPA’s proposed revisions to the LCR.

Many of the agency's proposed revisions are substantial and pertain to matters with well-known, serious, and extensive public health ramifications (e.g., lead service line replacement requirements, tap water sampling protocols, methodologies for preventing lead-in-water exposures in schools and childcare facilities). For this reason, the lengthy Federal Register notice that required over a decade for EPA to develop, and the extensive technical documents cited in support of the proposed revisions, warrant extensive review and careful analysis.

Given the scope of EPA's proposal and its public health impact, and consistent with the requirement in 5 U.S.C. § 553(c) that the public have a meaningful opportunity to comment, **we request that EPA:**

1. **Hold public hearings**, as required by the Safe Drinking Water Act (42 U.S.C. § 300g-1(d):
  - In cities such as Chicago, IL; Flint, MI; Milwaukee, WI; Pittsburgh, PA; and Washington, DC with mobilized lead-in-water activists, many of whom cannot afford to travel far to testify;
  - With adequate public notice; and
  - In venues that are accessible by public transportation and at times that accommodate working people's schedules.
  
2. **Extend the public comment period** from January 13, 2020 to **March 13, 2020** (60 days) for EPA, and from December 13, 2019 to **March 13, 2020** (90 days) for the Office of Management and Budget (OMB).

These adjustments will provide the minimum reasonable opportunity for our coalition and its members to comment on this significant proposal.

Should you have any questions, please contact Yanna Lambrinidou at 202.997.1834 or [pnalternatives@yahoo.com](mailto:pnalternatives@yahoo.com).

Sincerely,

Yanna Lambrinidou, PhD  
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Cc. Andrew Wheeler  
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