



December 16, 2019

David Ross, Assistant Administrator  
Office of Water, U.S. Environmental Protection Agency  
1000 Pennsylvania Avenue, NW  
Mail Code 4101M  
Washington, DC 20460

Re: Proposed Lead and Copper Rule Revisions, 84 FR 61684, Docket: EPA-HQ-OW-2019-0300 – Request for Extension of Comment Period

Dear Assistant Administrator Ross:

The [Environmental Protection Network](http://environmentalprotectionnetwork.org) (EPN) is an organization comprised of over 450 U.S. Environmental Protection Agency (EPA) alumni volunteering their time to protect the integrity of EPA, human health and the environment. We harness the expertise of former EPA career staff and confirmation-level appointees to provide insights into regulations and policies proposed by the current administration that have a serious impact on public health and environmental protections.

EPN commends EPA for its efforts on the proposed rule, National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions. EPA is requesting comments by January 13, 2020. Given the magnitude of the revisions and added complexity of this proposed rule, EPN is requesting that EPA extend the 60-day comment period for an additional 30 days to allow the public the time needed to prepare the most comprehensive comments possible.

EPN appreciates both the challenge and importance of updating the 1991 Lead and Copper Rule (LCR). The current LCR has been one of the most complex and challenging to implement for the water systems and State primacy agencies. The LCR revisions have been in development for more than a decade and add complexity and substantive new provisions to the current rule.

The proposal introduces many new elements that were not discussed in previous stakeholder processes. The new requirements for lead service line inventories and replacement plans, revised lead sampling protocols, and a significant increase in water system requirements will require significant new resources at all levels after the rule is finalized. It is vitally important that the public be given sufficient time to evaluate the LCR proposal and thousands of pages of supporting documentation. We expect to provide useful comments to EPA by the end of the comment period.

We would appreciate hearing EPA's response to this request as soon as possible so that we are able to more effectively engage our membership in our analysis of the proposed rule.

If you have any questions regarding this request, please contact me at [michelle.roos@environmentalprotectionnetwork.org](mailto:michelle.roos@environmentalprotectionnetwork.org) or please contact our Drinking Water Team lead Carl Reeverts at [carlbreeverts@gmail.com](mailto:carlbreeverts@gmail.com).

Respectfully submitted,

Michelle Roos  
Executive Director  
Environmental Protection Network