November 14, 2019

Mr. David Ross
Assistant Administrator
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Mail code: 4101M
Washington, DC 20460–0001


Dear Assistant Administrator Ross:

Today, the Federal Register contains the U.S. Environmental Protection Agency’s (EPA) Proposed Lead and Copper Rule Revisions (LCR). Congratulations to the team at the Agency on its efforts to place the proposed rule revisions into a public docket for notice and comment. It was no small task given the complexity associated with managing lead in drinking water.

The LCR is one of the most challenging drinking water standards currently being implemented and one that impacts every community and nontransient, noncommunity water system in the United States. The complexity and breadth of the current rule has resulted in the more than decade long development process for this proposal.

Our organizations and our members will be preparing comments on the proposed rule. Given the importance of this rule and the following considerations, our organizations request that EPA extend the comment period for an additional 30 days:
1. The proposed rule is substantially different than the current rule and includes elements that were not discussed in prior stakeholder processes.

2. While EPA released a pre-publication copy of the current notice, the actions EPA anticipates under the proposal will not be clear until we can closely examine the supporting docket, particularly the Economic Analysis.

3. The supporting documentation in the proposed rule docket is literally thousands of pages in length, many important elements of which have not be subject to public scrutiny prior to the opening of the docket.

4. The LCR revisions have been in development for more than a decade. The last substantive public process for broad-based stakeholder input was completed in 2015. The last input opportunity provided by EPA, the federalism consultation, was in early 2018. The public deserves a reasonable period of time to review, ask clarifying questions of the Agency, and discuss the proposal, prior to close of the public comment period.

If you have any questions regarding this correspondence, please contact any of the undersigned or our staff (AWWA, Steve Via, 202.326.6130; NLC, Carolyn Berndt, 202.626.3101; NAWC, Rik Hull, 717.439.8852; NRWA, Mike Keegan, 202.294.4785; and USCM, Judy Sheahan, 202.861.6775).

Best regards,

G. Tracy Mehan, III
Executive Director – Government Affairs
American Water Works Association

Robert F. Powelson
President and CEO
National Association of Water Companies

Clarence E. Anthony
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National League of Cities

Sam Wade
CEO
National Rural Water Association

Tom Cochran
CEO and Executive Director
The U.S. Conference of Mayors
To better understand our organizations

**AWWA** – The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation’s drinking water and treat almost half of the nation’s wastewater. Our 50,000-plus total membership represents the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.

**NAWC** – Every day, private water service companies help provide essential water and wastewater services to nearly 73 million people in the United States. That’s almost one quarter of our nation’s population. The National Association of Water Companies is the voice of the private water industry—the organization exclusively representing this group of quality service providers, innovation drivers and responsible partners. We are an association defined by our members, and by working together we can leverage our strengths to more effectively address the opportunities and challenges facing our nation. We serve as a credible resource and qualified professional partner for anyone who cares about safe and high-quality water.

**NLC** – The National League of Cities (NLC) is the voice of America’s cities, towns and villages, representing more than 200 million people. NLC works to strengthen local leadership, influence federal policy and drive innovative solutions. Working with 49 state municipal leagues, NLC serves as a resource to and advocate for 19,000 cities, towns and villages.

**NRWA** – The National Rural Water Association is the country’s largest public drinking water and sanitation supply organization with over 30,000 members. Safe drinking water and sanitation are generally recognized as the most essential public health, public welfare, and civic necessities.

**USCM** – The United States Conference of Mayors is the official non-partisan organization of cities with a population of 30,000 or larger. Each city is represented by its chief elected official, the mayor.