



Environmental Council of the States

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November 27, 2019

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

Via email and regulations.gov: EPA-HQ-OW-2019-0300

RE: Request for Extension of Comment Period -- Proposed Lead and Copper Rule Revisions

Dear Assistant Administrator Ross:

The Environmental Council of the States (ECOS) commends EPA for its efforts on the proposed rule, *National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions*. Due to the complexity of the proposed revisions, ECOS requests a 30-day extension of the comment period from the current closing date of January 13, 2020 to February 13, 2020.

ECOS appreciates both the challenge and importance of updating the 1991 Lead and Copper Rule. The results of these revisions will affect state and territorial water programs that will implement the changes. Given the complexity and magnitude of this proposed rule and its impact to states, we believe that an extension of the comment period would be appropriate. ECOS recognizes EPA's desire to complete these revisions in a timely manner, but in order to provide meaningful and thorough feedback on the proposed revisions, an additional 30 days to comment would be appreciated.

ECOS members look forward to continuing to work with the Agency to improve the protection of public health and the environment by reducing exposure to lead in drinking water. If you have any questions regarding this correspondence, please contact me at dwelsh@ecos.org.

Sincerely,

Donald Welsh
Executive Director
Environmental Council of the States

Jim Macy
Nebraska Department of
Environment and Energy
ECOS President

Patrick McDonnell
Pennsylvania Department of
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ECOS Vice President

Ben Grumbles
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