



**ASSOCIATION OF  
METROPOLITAN  
WATER AGENCIES**

**LEADERS IN WATER**

1620 I Street, NW, Suite 500  
Washington, DC 20006

**P** 202.331.2820  
amwa.net

October 25, 2022

Dr. Alison Cullen  
Chair, EPA Science Advisory Board  
1300 Pennsylvania Avenue NW  
Washington, DC 20004

Re: Charge to the Science Advisory Board (SAB) Consultation on the Lead and Copper Rule Improvements (LCRI)

Dear Dr. Alison Cullen:

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to provide feedback regarding the EPA SAB consultation on the Lead and Copper Rule Improvements (LCRI). AMWA is an organization representing the largest publicly owned drinking water utilities in the United States, and collectively its membership serves more than 160 million people. Our members represent diverse metropolitan areas and have long been working to identify and replace lead service lines in their service areas. The association has been involved with the Lead and Copper Rule since its inception and values the work that EPA has done to decrease the risk of lead and copper to public health while prioritizing environmental justice.

AMWA's comments respond to the charge questions addressed explicitly below.

### **Charge Questions**

**Charge Question 1. Tools, Indicators, and Metrics for the Lead and Copper Rule Improvements Case Studies – a. Please comment on the tools/indicators/metrics, such as the recently released Environmental Justice Index (EJI) and Climate and Economic Justice Screening Tool (CEJST), that EPA should consider using when developing lead service line replacement case studies to support the development of the Lead and Copper Rule Improvements environmental justice analysis.**

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Regarding the Council on Environmental Quality's (CEQ) Climate and Economic Justice Screening Tool, there are some deficiencies that AMWA believes makes it ineffective for assessing environmental justice impacts in replacing lead service lines. Most significantly, the tool does not include any criteria directly related to drinking water. There are tools that track compliance with EPA drinking water regulations that could assist in identifying areas where standards are not met. The Enforcement and Compliance History Online (ECHO) system includes public water systems data from the EPA's Safe Drinking Water Information System (SDWIS) database. The SDWIS database includes information on all public water systems in the nation and SDWA violation information for each public water system. AMWA would suggest using data on lead in drinking water to inform environmental justice considerations in development of LCRI case studies.

**Charge Question 1, b. Given the identified tools and indices (i.e., EJScreen, SVI, ADI) please comment on whether there is there a sub-set of variables within the indices which should be given higher weights in the Lead and Copper Rule Improvements environmental justice assessment.**

The EPA SAB should prioritize environmental justice screening tools that prioritize lead service line replacement in areas with both lead service lines and young children, as lead's detrimental health effects are most pronounced in young children.

#### **Other Considerations Not Addressed in the Charge Questions**

The screening tools under consideration do not consider several factors that go into assessing water affordability in a water utility service area beyond measures of low income. Many of these factors, like cost of living in a particular area, percent of income spent on water services, aging water infrastructure, and water availability are expected to put upward pressure on local water rates in the coming years and are not incorporated into the tools considered.

Additionally, tools that screen geographic units at fine scales would benefit water utilities most as they develop plans to prioritize areas for lead service line (LSL) replacement. As part of the LCRR, utilities are currently hard at work developing LSL inventories and plans to replace LSLs. These inventories could be coupled with tools to identify disadvantaged communities with an elevated risk of lead in drinking water. Identifying and prioritizing lead service line replacement at a Census tract level is a more significant endeavor than identifying and prioritizing replacement at a Census block level. Environmental justice screening tools that analyze geographic units at the block and block group levels (EPA's EJ Screen, the Area Deprivation Index (ADI)) should be considered above those that analyze units at the census tract level (e.g., the CDC/ATSDR Social Vulnerability Index, CDC's Environmental Justice Index (EJI)).

Thank you for the opportunity to comment. If you have any questions about this letter, please contact Brian Redder, AMWA's Manager of Regulatory and Scientific Affairs at [redder@amwa.net](mailto:redder@amwa.net) or Jessica Evans, AMWA's Government Affairs Associate at [evans@amwa.net](mailto:evans@amwa.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Dobbins". The signature is fluid and cursive, with a large initial "T" and a stylized "D".

Thomas Dobbins  
Chief Executive Officer

cc: Dr. Jennifer McLain, EPA Office of Ground Water and Drinking Water  
Eric Burneson, EPA Office of Ground Water and Drinking Water  
Dr. Thomas Armitage, Designated Federal Officer, EPA Science Advisory Board