



American Academy of Pediatrics



DEDICATED TO THE HEALTH OF ALL CHILDREN®





































The National Association of

NURSE PRACTITIONERS







IFORNIA NP













United States House of Representatives Washington, DC

Re: H.J. Resolution 18, Resolution of Disapproval National Primary Drinking Water Regulations for Lead and Copper: Improvements (LCRI)

Dear House Committee on Energy and Commerce,

In February 2024, the Alliance of Nurses for Healthy Environments (ANHE) submitted comments, 1 endorsed by twenty-four nursing and health based organizations, to the Environmental Protection Agency (EPA) asking for health based standards in drinking water and continued health protections

¹ Alliance of Nurses for Healthy Environments. (Feb 6 2024). Twenty four organizations join ANHE in urging EPA to protect health in the Lead and Copper Rule. https://envirn.org/twentv-four-organizations-ioin-anhe-in-urging-epa-to-protect-health-in-the-lead-and-copper-rule/

throughout the course of lead service line replacement. During this public comment period, the EPA received the most public comments ever submitted on the Safe Drinking Water Rule in history, 2,3,4 receiving hundreds of thousands of comments from local and national environmental, public health, and community advocacy groups in support of a strong Lead and Copper Rule Improvements (LCRI) rule.

The overwhelming majority of comments supported the strongest possible safeguards to remove lead pipes across the country and urged stronger action to stop lead contamination at schools and child care centers. The finalized Lead and Copper Rule Improvements (LCRI), sometimes called just "the Lead and Copper Rule," 5was released in October 2024. The final rule requires drinking water systems across the country to identify and replace lead pipes within 10 years, more rigorous testing of drinking water and a lowering of the threshold for required action to protect people from lead exposure in water.6

Before the current Trump Administration took office, a rushed congressional proposal⁷ was introduced to repeal protections for millions of people across the United States and to revoke the finalized Lead and Copper Rule requiring water systems to remove nine million lead service lines⁸. The proposal to repeal the EPA's Lead and Copper Rule is seriously misguided as there is no safe amount of lead in drinking water and no safe amount of exposure to lead. Lead can affect almost every organ and system in the human body; even at very low levels lead can cause serious, irreversible harm to the developing brains and nervous systems of babies and young children. Lead exposure in children contributes to potentially irreversible neurological impacts, with those exposed, especially children of color, facing life-long health impacts. Lead is dangerous for adults too. Lead has long been recognized to be a cause of hypertension⁹ and a risk factor¹⁰ for heart disease, stroke, and chronic kidney disease. Access to safe drinking water is essential for families to live healthy and productive lives. Yet, in states across the nation, children, especially children of color, are exposed to lead and other toxic chemicals in their tap water at home and at school because of lead service lines. Lead pipes exist in cities and towns in all 50 states¹¹ and millions¹²

² Kelly, M. (Feb 6 2024). Most public comments submitted on Safe Drinking Water rule in history: Communities call on EPA to finalize the strongest possible safeguards to get the lead out of drinking water and protect public health. Natural Resources Defense Council (NRDC). https://www.nrdc.org/press-releases/most-public-comments-submitted-safe-drinking-water-rule-history

³ Children's Environmental Health Network comments with sign on by public health, child health, and health equity professionals to EPA on the proposed National Primary Drinking Water Regulations: Lead and Copper Rule Improvements. (Feb 5 2024). https://www.regulations.gov/comment/EPA-HQ-OW-2022-0801-1095

⁴ American Academy of Pediatrics. (Feb 2 2024). AAP Letter on EPA Lead and Copper NPRM Final. https://www.regulations.gov/comment/EPA-HQ-OW-2022-0801-0790

⁵ EPA. (Last updated Jan 31 2025). Lead and Copper Rule Improvements: Rule summary. https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements?utm_content=&utm_medium=email&utm_name=&utm_s ource=govdelivery&utm term=

Olson, E. (Dec 22 2024). Welcoming the EPA's new lead in tap water rule: An overview. Natural Resources Defense Council (NRDC). https://www.nrdc.org/bio/erik-d-olson/welcoming-epas-new-lead-tap-water-rule-overview

United States Congress. (Jan 13, 2025). 119th Congress. H.J. Resolution 18. https://www.congress.gov/119/bills/hjres18/BILLS-119hjres18ih.pdf 8 Olson, E. (Jan 24, 2025). Will the new Congress say to America's kids: Let them drink lead? An ill-informed congressional proposal would repeal the EPA's recent rule protecting millions of kids and adults across the country. Natural Resources Defense Council (NRDC). https://www.nrdc.org/bio/erik-d-olson/will-new-congress-say-americas-kids-let-them-drink-lead

⁹ Tsoi, M.F., Lo, C.W.H., Cheung, T.T. et al. (2021). Blood lead level and risk of hypertension in the United States National Health and Nutrition Examination Survey 1999-2016. Scientific Reports, 11, 3010. DOI: https://doi.org/10.1038/s41598-021-82435-6 ¹⁰ Landrigan, P.J. (2018). Lead and the heart: an ancient metal's contribution to modern disease. The Lancet, 3(4), E156-E157.

DOI:https://doi.org/10.1016/S2468-2667(18)30043-4 11 Olson, E.D. & Stubblefield, A. (July 8, 2021). Lead pipes are widespread and used in every state. Natural Resources Defense Council (NRDC).

¹² Fedinick, K.P. (2021, May 13). Millions served by water systems detecting lead. Natural Resources Defense Council (NRDC).

are drinking contaminated water from their kitchen taps. This isn't a problem we can forget about, it's one that impacts community health directly.

While Congress banned the installation of lead pipes to deliver drinking water in 1986, decades later, millions of people across the country still have lead service lines going into their homes. Between January 1, 2018, and December 31, 2020, 186 million people in the United States, 13 or 56% percent of the country's population, drank water from drinking water systems detecting lead levels exceeding the level of 1 part per billion (ppb). The American Academy of Pediatrics 14 recommends no higher than 1 ppb to protect children from lead in school water fountains.

Repealing protections against lead in tap water is not the answer. Polling shows¹⁵ that about 9 in 10 voters, including most Republican voters, supported a rule to require water systems to replace all of their lead pipes within 10 years. While the current Administration's controversial Executive Order¹⁶ may cast a shadow over whether Bipartisan Infrastructure Law water infrastructure funding may be frozen, the wide and bipartisan support for clean drinking water resources demonstrates that this problematic freeze should be lifted. The congressional repeal of the EPA lead in drinking water rule under the Congressional Review Act,¹⁷ would not only revoke the newly finalized Lead and Copper Rule but would prohibit the agency from ever adopting a "substantially similar" rule causing the country to revert to an old ineffective rule that the EPA has said would mean that 95% of the nation's lead service lines could remain in use.

But Congress can help. We, the undersigned nursing, medical, and public health organizations, urge the House Energy and Commerce Committee to oppose the congressional proposal to repeal protections for millions of people across the United States and revoke the U.S. Environmental Protection Agency's (EPA) Lead and Copper Rule Improvements.

Sincerely,

AbleDifferently

Alliance of Nurses for Healthy Environments (ANHE)

American Academy of Pediatrics

¹³ See citation 9 [Fedinick]

¹⁴ American Academy of Pediatric (July 2016, reaffirmed April 2021). Prevention of childhood lead toxicity. *PEDIATRICS*, *138*(1), https://pediatrics.aappublications.org/content/pediatrics/138/1/e20161493.full.pdf

¹⁵ Global Strategy Group. (Nov 2022). *Re: Recent survey shows strong support for revising EPA Lead and Copper Rule*. https://www.nrdc.org/sites/default/files/lead-copper-rule-survey-memo-policymakers-20221109.pdf

¹⁶ The White House Presidential Actions (Jan 20, 2025). *Unleashing American energy: Executive order*. https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/#:~:text=All%20agencies%20shall%20immediately%20pause%20the%20disbursement%20of%20funds%20appropriated%20through%20the%20Inflation%20Reduction%20Act%20of%202022%20(Public%20Law%20117%2D169)%20or%20the%20Infrastructure%20Investment%20and%20Jobs%20Act%20(Public%20Law%20117%2D58)%2C

¹⁷ Congressional Research Service (Aug 29, 2024). *The Congressional Review Act (CRA): A brief overview.* https://crsreports.congress.gov/product/pdf/IF/IF10023

¹⁸ EPA (Dec 17, 2021). Review of the National Primary Drinking Water Regulation: Lead and Copper Rule Revisions (LCRR). https://www.federalregister.gov/documents/2021/12/17/2021-27457/review-of-the-national-primary-drinking-water-regulation-lead-and-copper-rule-revisions-lcrr#:~:text=EPA%20estimates%20that%20the%20LCRR%20would%20result%20in%20replacements%20of%20only%20approximately%20five%20percent%20of%20LSLs%20over%20a%2035-year%20period.%20Our%20review%20leads%20the%20agency%20to%20believe%20that%20there%20are%20are%20approximately%20more%20to%20address%20this%20urgent%20public%20health%20risk.

American Association of Occupational Health Nurses (AAOHN)

American College of Nurse-Midwives

American Public Health Association (APHA)

ANA\California

Association of Community Health Nursing Educators (ACHNE)

Association of Public Health Nurses (APHN)

Children's Environmental Health Network (CEHN)

Council of Public Health Nursing Organizations (CPHNO)

Delaware Nurses Association (DNA)

Disability Rights Mains

Greater Boston Physicians for Social Responsibility

GreenRoots

Learning Disabilities Association of America

Learning Disabilities Association of Alabama

Learning Disabilities Association of Arkansas

Learning Disabilities Association of California

Learning Disabilities Association of Delaware

Learning Disabilities Association of Georgia

Learning Disabilities Association of Illinois

Learning Disabilities Association of Indiana

Learning Disabilities Association of Iowa

Learning Disabilities Association of Maine

Learning Disabilities Association of Maryland

Learning Disabilities Association of Michigan

Learning Disabilities Association of Minnesota

Learning Disabilities Association of New Jersey

Learning Disabilities Association of New York State

Learning Disabilities Association of Oklahoma

Learning Disabilities Association of South Carolina

Learning Disabilities Association of Texas

Learning Disabilities Association of Utah

Learning Disabilities Association of Virginia

Learning Disabilities Association of Wisconsin

Mass General Brigham

National Association of Hispanic Nurses (NAHN)

National Association of Neonatal Nurses

National Association of Nurse Practitioners in Women's Health (NPWH)

National Association of Pediatric Nurse Practitioners (NAPNAP)

National Association of School Nurses

National League for Nursing (NLN)

Ohio Nurses Association

Philippine Nurses Association of America

Physicians for Social Responsibility (PSR)

Physicians for Social Responsibility Iowa

Physicians for Social Responsibility Florida

Physicians for Social Responsibility Pennsylvania

Rural Nurse Organization (RNO)

San Francisco Bay Physicians for Social Responsibility

Society of Latinx Nurses (SOLN)

Washington Physicians for Social Responsibility