

April 6, 2020

The EPA Docket Center
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Reference: Docket ID No. EPA-HQ-OW-2020-0017

Dear Desk Officer,

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments to the Environmental Protection Agency’s (EPA’s) February 5, 2020 docket, “Information Collection Request for the 2020 Drinking Water Infrastructure Needs Survey and Assessment (DWINSA).” Representing more than 107,000 registered dietitian nutritionists (RDNs),¹ nutrition and dietetics practitioners, registered, and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the world and is committed to a vision of the world where all people thrive through the transformative power of food and nutrition and related support systems. Every day we provide a variety of nutrition care services for all populations, including those of low income with limited access to safe and clean water supplies.

The Academy strongly supports the EPA’s efforts to conduct surveys to identify the infrastructure needs of public water systems nationwide for the next twenty years. Survey effectiveness and utility would benefit from ensuring adequate attention to underserved or marginalized communities, especially in areas with infrastructure of uncertain age, quality and construction. The Academy notes the importance of reliable potable water supplies to efforts to control disease, and promotes equitable access to and utilization of safe water.

A. Essential Nature of the Survey

Given that securing reliable supplies that meet respective drinking water standards at the source as well as the point of use may be challenging for some communities, the Academy finds the survey essential to EPA’s functions. Access to safe water supplies is essential to the Academy’s mission as well, and the Academy formally endorses “equitable access to and utilization of safe water” as a component of its Strategic Plan.² The Academy notes the significant role water and hydration status play in disease, including: 1) chronic disease,³ 2)

¹ The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

² The Academy’s Strategic Plan. The Academy of Nutrition and Dietetics. Available at https://www.eatrightpro.org/leadership/governance/board-of-directors/strategic-plan?rdType=section_change&rdProj=leadership_2019&rdInfo=strat_plan. Accessed April 3, 2020.

³ Armstrong LE, Muñoz CX, Armstrong EM. Distinguishing Low and High Water Consumers-A Paradigm of Disease Risk. *Nutrients*. 2020 Mar 23;12(3). pii: E858. doi: 10.3390/nu12030858.

acute conditions mostly related to chemical⁴ and bacterial/viral⁵ contamination of water supplies, and 3) respiratory diseases.⁶

Notably, the COVID-19 pandemic has accentuated the critical role of water in public health. Although hand washing is one of the primary means to reduce risk of infection, at least 460,000 U.S. households lack plumbing facilities⁷ and these households are disproportionately low-income, Native Alaskan, American Indian, African-American or Hispanic.⁸ These populations are also more likely to be served by systems which recently violated Safe Drinking Water Act standards—a total of about 45 million Americans.⁹ The COVID-19 pandemic has also refocused attention on the nation’s significant water infrastructure needs.¹⁰ For these reasons, and the distinctly higher rates of chronic disease among these populations,¹¹ the Academy suggests expansion of the survey to include a representative sample of lower socioeconomic status households across the country.

B. Recommendations for Survey Content

The Academy suggests addition of the following content to each of the DWINSA and the Native American DWINSA surveys:

1. In “Source, Treatment, Storage, and Pumping Inventory”, include “Truck or other means of delivery by vehicle from remote location” as a source option.
2. In “Transmission and Distribution Inventory,” include a specific option for pipe of unknown materials. Consider adding an option of “unknown” for “% of this category/size pipe in poor condition” for each category of pipe of known material.

⁴ Landrigan PJ, et al. The Lancet Commission on pollution and health. *Lancet*. 2018 Feb 3;391(10119):462-512. doi: 10.1016/S0140-6736(17)32345-0. Epub 2017 Oct 19.

⁵ Sharma S, Sachdeva P, Viridi JS. Emerging water-borne pathogens. *Appl Microbiol Biotechnol*. 2003 Jun;61(5-6):424-8. Epub 2003 Apr 9.

⁶ Ridley C, Thornton DJ. Mucins: the frontline defence of the lung. *Biochem Soc Trans*. 2018 Oct 19;46(5):1099-1106. doi: 10.1042/BST20170402. Epub 2018 Aug 28.

⁷ U.S. Census Bureau; American Community Survey (ACS): Tenure by Plumbing Facilities, 2010-2018.

Available at

<https://data.census.gov/cedsci/all?q=%20plumbing%20american%20community&hidePreview=false&tid=ACSDT1Y2018.B25049>. Accessed April 3, 2020.

⁸ Deitz S, Meehan K. Plumbing Poverty: Mapping Hot Spots of Racial and Geographic Inequality in U.S. Household Water Insecurity. *Ann. Am. Assoc. Geogr.*, 2019 109:4, 1092-1109, doi: 10.1080/24694452.2018.1530587

⁹ Fedinick KP, Taylor S, Roberts M. Watered Down Justice. Natural Resources Defense Council, Coming Clean and Environmental Justice Health Alliance. 2019. Available at <https://www.nrdc.org/sites/default/files/watered-down-justice-report.pdf>. Accessed April 3, 2019.

¹⁰ Nilsen, E. “What we know about the fourth coronavirus relief bill.” Available at <https://www.vox.com/2020/4/3/21206931/what-we-know-about-congress-fourth-coronavirus-bill> Accessed April 3, 2019.

¹¹ Weinstein, J. N., Geller, A., Negussie, Y., & Baciu, A. (2017). *Communities in action: pathways to health equity*. Chapter 2: The State of Health Disparities in the United States. Washington, DC: National Academic Press.

3. Add a question: “In what way is the system known to not be in compliance with EPA drinking water standards? What repairs/upgrades are required to ensure compliance? What are estimated costs of these repairs/upgrades?”
4. Add a question: “Is the community system able to supply all households and businesses within the designated town/city boundary? If not, why not?” Provide answer options, such as: distance, geology, lack of clear right-of-way, and other options as may be prudent.
5. Add a question: “Are there known or suspected risks to the quality of the community supply from any of the following: municipal or private landfills, hazardous waste sites or brownfields, farms or meat processing plants, industrial plants, mines or mine drainage ponds or lagoons, construction sites, private property containing miscellaneous hazards, other?”
6. Add a question: “Are there known or suspected risks to the quantity of the community supply from any of the following: falling groundwater table, falling reservoir level or depleted surface flow, and is this change due to altered geology, lack of precipitation, or other cause, known or unknown?”
7. Add a question to be provided to low-income households: “Do you drink your household water? If not, why not? Please check all that apply: taste concerns (add explanation), health concerns (add explanation), visual concerns (add explanation), lack of supply due to: costs to install private line from public connection, lack of plumbing or fixtures in house, repairs to existing plumbing not affordable, unresolved landlord-tenant issues.”
8. Add a question: “Of those residents who don’t consume their household water, how many consume water from another site in the community (i.e., the same supply)?”

The Academy appreciates the opportunity to comment on the “Information Collection Request for the 2020 Drinking Water Infrastructure Needs Survey and Assessment (DWINSA)” docket. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Mark Rifkin at 202-775-8277 ext. 6011 or by email at mrifkin@eatright.org with any questions or requests for additional information.

Sincerely,


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