

March 23, 2026

Steven D. Cook
Principal Deputy Assistant Administrator
Office of Land and Emergency Management (OLEM) Mail Code 5401T
U. S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Deputy Assistant Administrator Cook,

As a group of scientists, clinical and public health professionals, attorneys and program directors dedicated to preventing childhood lead exposure for decades, we are writing to ask that you reconsider your October 16, 2025 directive updating the Office of Land and Emergency Management's (OLEM) residential soil lead guidance. The directive reverses long-standing, science-based protections for children, creates inconsistency between EPA and other federal and state standards to reduce lead exposure and thus, is likely to increase lead exposure risks for families living on or near contaminated sites compared to the general childhood population. EPA has repeatedly evaluated and calculated the direct health costs of lead exposures, demonstrating that remediation provides social and health benefits to US society; indeed, benefits that far exceed the costs of the considered actions. Thus, we urge EPA to reinstate the January 2024 protections.

Our main concerns include:

1. Using a target level of 5 micrograms per deciliter ($\mu\text{g}/\text{dL}$) instead of the blood lead reference value for children of 3.5 $\mu\text{g}/\text{dL}$ established by the Centers for Disease Control and Prevention (CDC) in 2021. The reference value of 3.5 $\mu\text{g}/\text{dL}$ is based on evidence that children with blood lead levels $\geq 3.5 \mu\text{g}/\text{dL}$ are exposed to more lead than the general childhood population, increasing their risk of intellectual and behavioral issues that affect school and life performance. The added risk of not utilizing the current CDC blood lead reference level of 3.5 $\mu\text{g}/\text{dL}$ not only affects the exposed children and their families, but causes well documented costs to society including special education and productivity losses.

In addition, given that lead contamination is ubiquitous and most children have more than one lead source available, the 3.5 $\mu\text{g}/\text{dL}$ should be used to set Preliminary Remediation Goals (PRGs) for the cleanup of any lead contaminated residential properties. This would make the PRG consistent with the department of Housing and Urban Development, CDC and most state and local health and

environmental quality departments (e.g., Texas, Pennsylvania, Wisconsin, South Carolina).

2. Given that no safe level of lead exposure has been identified in children and that multiple sources of lead are common in children's environments, the Removal Management Level (RML) of 600 ppm ignores the compelling body of scientific evidence collected over the last century. Returning to the lead concentration of 200 ppm, or 100 ppm if more than one lead source is identified, established in 2024 would provide greater protection but if after study EPA determines that it is indeed unworkable, the previous 400 ppm standard, in place for decades, still provides a greater degree of protection for children than the new 600 ppm level. It would prevent disparities in lead exposure for children living in Superfund sites compared to neighboring children where the soil lead standard of 400 ppm is in place. It would also maintain trust in EPA that may be damaged should it become the first federal agency to adopt an action level for lead to be less protective for children.

3. EPA provided **no scientific evidence or analysis** in support of its decision that the regional screening level of 200 ppm established in 2024 or the 400 ppm lead concentration established earlier were unworkable. Previous EPA work extensively supports these values both in terms of impact on human health and the costs versus the benefits of limiting children's lead exposure. EPA should conduct analyses consistent with previous methods that compare the impact of the change in the RML from 200 ppm and 400 ppm and make these studies available to the public.

We ask that you reconsider the October 16, 2025 directive, restore the January 2024 residential soil lead protections, and engage with public health partners to ensure EPA's guidance reflects the best available science.

You are welcome to contact any of us, listed below are our affiliations.

CC: Sheila Xiah Kragie, EPA's Action Lead Coordinator

Grace Robiou, Director, Children's Health Protection Division

Signatures

Joseph M. Braun, RN, MSPH, PhD
Professor of Epidemiology
Director, Center for Climate,
Environment, and Health
Brown University
Providence, RI

Charlotte Brody RN
Vice President for Environmental and
Occupational Health
BlueGreen Alliance
Minneapolis, MN

Mary Jean Brown ScD, RN
Adjunct Faculty
Harvard Chan School of Public Health
Boston MA
Chief Lead Poisoning Prevention Branch
(ret.)
Atlanta, GA

Carla Campbell, MD, MS, FAAP
Affiliate professor
Dornsife School of Public Health
Drexel University
Philadelphia, PA

Wallace L. Chambers Jr., Ph.D., MAS, MHA,
REHS
Commissioner of Environment
Department of Public Health
Cleveland, Ohio

Aimin Chen, MD, PhD
Professor of Epidemiology
Perelman School of Medicine, University of
Pennsylvania

Jean-Marie Kauth, PdD, MPH
Benedictine University

Albert Lin
Professor of Law
University of California, Davis School of
Law
Davis, CA

Ronnie Levin, Instructor
Harvard TH Chan School of Public Health
Boston, MA

Ruth Ann Norton
President & CEO
Green & Healthy Homes Initiative
Baltimore, MD

Leslie Rubin, MD
Associate Professor in the Department of
Pediatrics at Morehouse School of
Medicine,
Founder, Break the Cycle of Health
Disparities, Inc.
Atlanta, GA

Anthony Oliveri, PhD, MPH
Section Manager
Environmental Epidemiology and Analytics
Section
Environmental Health Bureau
Michigan Department of Health and
Human Services

Veena Singla, PhD
Affiliate
University of California San Francisco
San Francisco, CA

Shirlee Tan, PhD
Senior Toxicologist
Environmental Health Services
Public Health – Seattle & King County

Carmen M Velez Vega
Universito of Puerto Rico
Medical Sciences Campus

Marya Zlatnik, MD
Professor of Obstetrics, Gynecology,
and Reproductive Sciences
San Francisco, CA

Maureen Swanson, MPA
Director, Project TENDR (Targeting
Environmental Neuro-Development Risks)
Hermitage, PA

Kristie Trousdale, MPH
Deputy Director
Children's Environmental Health Network
Washington, DC

Nsedu Obot Witherspoon, MPH
Executive Director
Children's Environmental Health Network
Washington, DC