

Submission to Regina City Council re: Shortening Regina's lead line replacement time schedule through utilization of Canada's Investment in Infrastructure Program

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Introduction

The *Get the Lead Out* committee has been actively discussing issues with concerned residents around the fact of lead tainted drinking water in our Regina inner city for over a year now. Many residents are deeply concerned about this issue, and express fear for their wellbeing and particularly for the health of the community's children.

Hundreds of people have already signed our petition which calls for reducing the city's 15 year lead line replacement framework to a 5 year time span. Acutely aware of economic disparities between districts in the affected regions, we want this work to begin in low income neighborhoods and proceed from there until all lead lines have been replaced by 2026. We are also calling on Regina to create a cost sharing arrangement with residents to cover the cost of all private side lead connections as is done in other jurisdictions including Saskatoon.

Our group's primary goal is to protect the health of Regina residents living with lead tainted water. Over the year we have accomplished a great deal. We have had more time to explore and research the issue. We have published articles, participated in interviews, organized a public webinar with France Lemieux of Health Canada's air and water quality branch, held meetings with the SHA and city officials and, most importantly, talked in depth with numerous residents about their experiences and concerns. Through all of this, we feel even more strongly about the urgent need to protect our health, particularly that of children, from permanent damage from drinking lead. Science has been clear for a very long time of the danger of any level of lead exposure to children.

We would like to remind Council that the Lead Service Connection Management Report (2021, pg.11) states:

"As this is a multi-year program, there will be future opportunities for City Council to refine or change the selected policy direction based on technical information and public input."

We feel that the public is providing clear direction and that options have now changed. We are requesting that funding from Canada's Investment in Infrastructure Program be used to fix the lines that are leaching lead into our water within five years. Although there are many worthy possibilities for the use of these funds, we believe that the lack of safe drinking water is an urgent public health emergency facing the City of Regina. As the Council's decision against completing the lead service connections in five years was largely based on their financial considerations, this obstacle is no longer there. This is an opportunity to safeguard the lives of our inner city residents without further delay.

## **Some Issues Facing Us Today**

The Lead Service Connection Management Program Report (City of Regina 5/26/21) was provided to City Council last year as background to aid in its decision as to which of the several scenarios for completion of the lead service line replacements to choose. The options were to complete the line replacements by 2050, 2036, 2031, or 2026. The report contained many impacts associated with each scenario such as the cost of repairing resulting road disturbances from digging up various older and newer roads, traffic impacts, figures around increased utility bills for each timeframe, additional administrative positions, etc. *Yet in no part of this influential report is there any mention of the social and health impact to the population of drinking lead contaminated water.* Although this document was the basis for the decision to expand the timeline three fold from the previous administration's plan, the well documented and devastating costs of lead on people's health were nowhere to be found. The information in the report instead focused on the financial weight of the options presented.

The decision by Council to wait up to 15 years was that the 5 & 10 year options were too expensive. Opinions were expressed that it would place too heavy of a "burden" on taxpayers. It was also said that the lead lines only concern three inner city wards so it was unfair to ask the entire city to pay for it. Aside from this showing a rather crass attitude toward the notion of the collective good, it also assumed that there was no other option but to use tax money and increased utility bills to cover the costs.

## **Water Filters**

It was also expressed that the filter program would suffice to assure that people were drinking safe water until their time came within the 15 years for line replacement. According to Health Canada's France Lemieux's presentation, water filters are only designed for temporary use. We do not consider 15 years as temporary use.

A lot of effort was put into the filter program in the past year to improve it. The Report estimated that it would cost the city approximately \$250,000 if the filter program was fully utilized. We now know from our discussions with people in Regina of many problems with filters. Even the recommended NSF certified filtration systems have yielded test results with high lead content in Regina. This is not only happening in Regina. In Newark, N.J., for example, filters were replaced with the provision of bottled water when it was found that the NSF filters were still testing for lead (Consumer Reports, 9/16/19). There may be many reasons the filtered water is still testing with lead. This includes faulty filters, faucet filters not fitting properly, improper use of the filter system, delay in replacement of old filters be it in the faucet mounted or pitcher filters, poor estimates on when it is time to change the filters, cost of replacement filters especially in homes with many people, using hot water with the filters and harming their capacity, among many other factors. Even if the 'fault' lay with the owner's use, the fact still remains that people continue to drink contaminated water despite their best efforts. No one can afford to test their filter water regularly, so many are turning to bottled water if they can finance this and transport and lift the heavy bottles.

## **Inequity**

Our *Get the Lead Out* committee has deep concerns about the (undoubtedly unintentional) level of disparity in the current policy. In Appendix A, I have attempted to copy the google map that is available on the Cathedral Area Community Association website to provide a visual depiction of the areas of our city with public lead service lines. As you may be able to see, many of Regina's disadvantaged areas have high levels of lead service lines. These are areas where many low income populations have their homes, including Indigenous peoples, new Canadians, and seniors, people living with disabilities and unemployed workers on fixed incomes. People in these areas are differently affected by the problem with their water than are people in the higher income areas. The experience of the policy toward addressing the lead service lines has a different impact. The only solution to this is to quickly replace the lead service lines so their water is guaranteed to be safe.

On many levels, there is an unequal balance built into the City's plan to deal with lead contamination. One example is the ability to use and pay for water filters, as discussed above. Computer access to City of Regina subsidy applications for filters may be more difficult. And people may not even know about how to get a free filter apparatus much less that they are available. People often share housing with several roommates in order to keep their costs down, and in such situations filters wear out very, very quickly. There is no way people could afford the filters needed.

Another example is that under the current policy, by phoning the City, one can get put on a list to have the removal of one's lead line done more quickly. Obviously this is an option for people who know about it and who own their homes. Many low income people are renters and have no access to being served more quickly.

Another way disparity is revealed is through the policy that says if you pay upfront for your private side lead line replacement, and have it completed, the City will move more quickly to conduct the necessary work on the public side of the service lines. Obviously, this is an option only for those with access to both money and homeownership. But there are many low income home owners, too, and having money for the replacement of the private side is out of the question for them.

This is just a brief summary of a few of the ways that Regina's approach to the issue of lead line replacement is inequitable. The only way to relieve these disparities is to replace the lead lines within five years. There is no short cut.

## **Conclusion**

It is a well known fact that Regina has among the highest rates of lead in its drinking water in Canada. Nonetheless, faster lead line replacement is not included within the options for use of the \$128 million remaining from the federal government's Canada Investment in Infrastructure Program (ICIP).

In the brief reference to this possibility at the May 25<sup>th</sup> Executive Committee it was stated that there isn't enough 'construction capacity' to do this job. We are not sure what this means. There seems to have been no questioning of this supposition. This is despite the fact that lead service line replacement qualifies for this funding. In fact, the ICIP guidelines state that helping communities provide clean water is one of its priorities:

“Help communities reduce air and water pollution, provide clean water, increase resilience to climate change and create a clean-growth economy”

Safe drinking water is a human right. We know that removing all lead pipes within five years is a challenge, but it is not impossible. The financial issues considered to be a barrier by Council are even more possible to overcome now than they were a year ago.

Common sense makes clear that a new aquatic centre should not be given priority over the health of the City’s residents.

“This map is based on City of Regina data; the Cathedral Area Community Association bears no responsibility for accuracy of City-provided data. This map does not reflect replacements that might have occurred after August 2021, so it’s best to confirm with the City the status of your property.” (Cathedral Area Community Association website)The interactive google map is available on the Cathedral Area Community Association website. If you click on the blue dots of houses, you will see the address of the lead line.

## City of Regina Lead Service Connections



