Regina City Council, Feb. 8, 2023
Submission by Dr. Patricia Elliott, Cathedral Area Community Association and Get the Lead Out Committee
RE. EX23-8 Tabled Amendment Item CM22-33 - Request Additional Information Utility Reserve and Reserve Surplus

Lead is a powerful neurotoxin that is known to reduce IQ in children. It is also linked to high blood pressure; kidney, brain and lung cancer; and early onset dementia.

The City of Regina has known since at least 2017 that thousands of Regina residents are being exposed daily to some of the highest lead levels reported in North America.

Health Canada states there is no safe level of lead in drinking water and, at the very most, there should never be more than .005 milligrams per litre present, or 5 parts per billion.

Random tests of central Regina homes found over half were above the 5 ppb limit. An astounding 34 per cent were over 50 ppb (10 times over the limit) and 11 per cent were above 100 ppb, even reaching as high as 219 ppb -- 44 times above Health Canada's maximum allowable concentration.

Health Canada tells the public, "If your home has a lead service line the best permanent solution is to have it replaced…Ask your municipality or water utility about any programs or incentives for replacing lead service lines."

The good news is that many Canadian and U.S. cities have moved forward with robust investment in removals and homeowner incentives, laying a path we can follow. Saskatoon, Waterloo, Brantford, Thunder Bay, Ottawa, and Guelph are among cities that offer forms of cost-sharing and grants to homeowners.

They have done so because they recognize the enormous health and social costs of a population exposed to lead. In particular, children with lifelong neural deficits and behavioural problems linked to lead exposure impact our schools, policing, health care, feeding programs, homeless shelters, and other social supports long into the future.

A study by the U.S.-based Health Impact Project found "removing leaded drinking water service lines from the homes of children born in 2018 would protect more than 350,000 children and yield $2.7 billion in future benefits, or about $1.33 per dollar invested."

Cities with removal programs have learned the work must include both city and private lines to be safe -- and that a major barrier is the cost to the homeowner. Covering the

whole amount is effective and administratively efficient. There are also immediate savings with reduced need for filter programs and anti-corrosion additives at the treatment plant.

To a lesser degree, cost-sharing with property owners also helps. Cities providing grants or payment caps find the public becomes far more willing to support the inconvenience and expense of lead line replacement. The City of Saskatoon, for example, was able to accelerate its line replacement partly because a backlog of people seeking replacements made it a priority for all. They are on track to have all their lines gone by 2027.

On the other hand, expecting property owners to independently initiate and/or pay for some portion of the replacement can lead to fewer replacements overall, and especially in low income communities, according to data examined by the Lead Service Line Replacement Collaborative.

Indeed, we've been told one of the reasons for slower removal in Regina is anticipated public backlash. Having streets dug up and being on the hook for a replacement bill doesn't create public support for lead line removal, in turn causing it to be a lower priority for politicians, despite the crucial importance to public health.

Unlike the other cities mentioned, Regina homeowners are held liable for the full cost of private side removal. As with many things, prices have jumped in the past year. A member of our committee's total bill for private side replacement was $8,400, and we've heard of people receiving estimates of up to $10,000. People need more help than what's being offered.

Currently, they can pay it back without interest over five years, and low income families have 10 years, but all income ranges are equally expected to cover the full amount.

Further, a program imbalance arises when property owners with financial means undertake private side replacements, which trigger city-side replacements. In this way, wealthier city blocks are dealt with more quickly than low-income blocks. This is an environmental injustice.

The LSLR Collaborative states, "An equitable LSL replacement program will recognize that not everyone has the same societal and economic advantages, and provide support, not equally across the population, but rather as appropriate according to an individual's circumstance."

In summary, helping fund private side replacement is cost-effective and it works. It contributes to social equity. And today we have an opportunity.

The motion notes there are surplus funds. It directs city administrators to find out if these surplus funds can help Regina families find a way toward safe drinking water.

At the very least, the City should explore covering the full cost of private side replacement for families eligible for the Affordable Access Program, with a cap on what non-AAP property owners can be expected to pay. To not even look at the possibility is a dereliction of public health. The City should also examine the immediate and long-term savings associated with having a safe drinking water supply for all.

Lead line replacement is inconvenient. It requires shuffling other priorities and schedules. But dangerous lead levels are the inconvenient truth you must face as our city's leaders.

Drinking water is perhaps *the* most vital core service the City of Regina delivers to residents. Its safety must be the number one priority.

**Sources**


K. Baehler, et. al., Full Lead Service Line Replacement: A Case Study of Equity in Environmental Remediation. *Sustainability*, Vol. 14, No. 1, 2022. https://www.mdpi.com/2071-1050/14/1/352

City of Regina. Dataset, central Regina household drinking water. 2017,

Health Canada. Drinking Water: What About Lead? https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/water-quality/what-about-lead.html

Health Canada. Guidelines for Canadian Drinking Water Quality: Summary Tables.

Health Impact Project (2017). Ten Policies to Prevent and Respond to Childhood Lead Exposure: An Assessment of Risks. https://altarum.org/sites/default/files/uploaded-publication-files/HIP_Childhood_Lead_Poisoning_report.pdf

Lead Service Line Replacement Collaborative. What Aspects of a LSL Replacement Program Might Have Disparate Impact and Why? https://www.lslr-collaborative.org/step-2-equity-analysis.html