



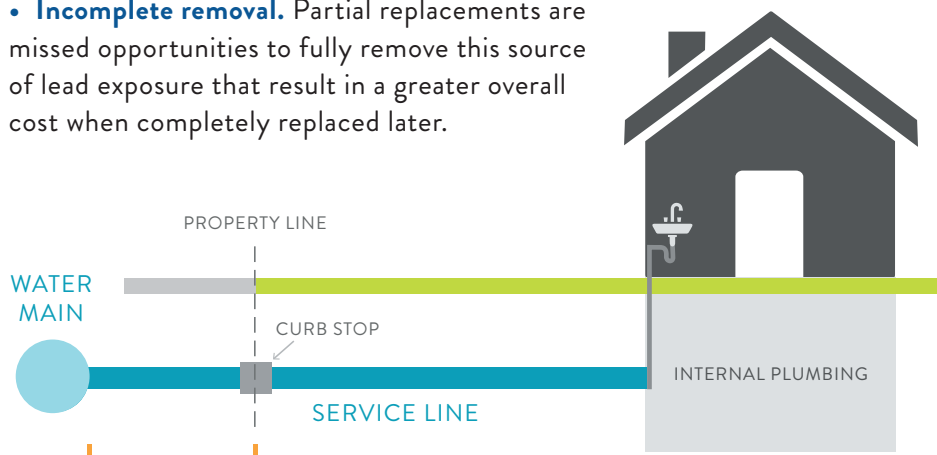
THE UNJUST CONSEQUENCES OF PROVIDENCE WATER'S PARTIAL LEAD PIPE REPLACEMENTS

Incomplete removals increase the risk of lead exposure in our drinking water, with the heaviest impacts falling on Black, Latinx, and Native American residents.

Thousands of homes served by Providence Water in RI get their drinking water from lead service lines (LSLs) that connect homes to the local water main under the street. The utility works to replace these lead pipes during its water main maintenance. Unfortunately, the utility often performs what are called partial LSL replacements, upgrading only the portion of the lead pipe that runs from the water main to the curb stop, leaving in place the remaining LSL that feeds into the home.

THE PROBLEM WITH PARTIAL REPLACEMENTS

- **Increased levels of lead in drinking water for months.** Partial replacement of LSLs can disturb the remaining lead pipe, temporarily increasing the risk of lead in the home's drinking water.
- **Uncertain long-term benefits.** While full LSL replacements are proven to provide long-term lead level reductions, there is no such evidence for partial replacements.
- **Incomplete removal.** Partial replacements are missed opportunities to fully remove this source of lead exposure that result in a greater overall cost when completely replaced later.



A typical **partial** lead service line replacement is replacing only this part of the service line

A **full** lead service line replacement is replacing the entire service line



ALARMING PRESENCE OF LEAD

in Providence Water's drinking water

27,500

Estimated number of full and partial LSLs in Providence Water's service area.

Providence Water recently ranked

#2 WORST

on a national priority watch list for lead.

EXCEEDED 15 PPB

EPA's lead action level (in parts per billion) for 15 of the last 16 years.

"ROUTINELY SEE FIRST DRAW SAMPLES IN EXCESS OF 100 PPB"

admitted Providence Water of their samples.



PEOPLE OF COLOR, RENTERS, AND FAMILIES IN POVERTY IN PROVIDENCE ARE MORE LIKELY TO LIVE IN HOMES WITH LSLs. OFTEN THEY ALSO HAVE LESS OF AN ABILITY TO PAY FOR THE FULL LSL REPLACEMENT.

UNJUST CONSEQUENCES

The only way to protect people from this source of lead contamination is to completely remove LSLs. Providence Water performs full LSL replacements only if homeowners agree to pay up to \$4,500 for half the replacement. If they cannot pay, the utility proceeds with a partial replacement. This practice forces homeowners to choose between a loan or continued risk of lead exposure.

People of color, renters, and families in poverty in Providence are more likely to live in homes with LSLs. Often they also have less of an ability to pay for the full LSL replacement. As a result, Providence Water's program puts them at a disproportionately higher risk of lead exposure in drinking water.

- **Disparity in loan program participation.** Close to half (43%) of the customers who signed loan agreements to pay for full LSL replacements came from a single zip code, 02906, where nearly 80% of residents who live in the home they own are white and wealthier than the average Providence County resident.
- **Lower median income.** Providence County's Black, Latinx, and Native American residents, on average, have a lower median household income than white residents, indicating less of an ability to pay to participate in Providence Water's replacement program.
- **More likely to rent.** Native American, Latinx, and Black residents in Providence Water's service area are more likely to be renters than white residents, meaning they cannot participate in the replacement program unless the homeowner decides to participate.

CIVIL RIGHTS COMPLAINT

As a recipient of federal funds from the Environmental Protection Agency, Providence Water has a duty under the Civil Rights Act of 1964 to ensure its practices do not have a discriminatory effect.

The Childhood Lead Action Project (CLAP) is leading an effort to file a civil rights complaint with EPA, asking the agency to require that Providence Water:

- Conduct full LSL replacements for all residents at no cost.
- Obtain community input to determine the most effective way to conduct outreach and education in affected communities.
- Ensure that any changes resulting from the complaint do not pose unintended consequences to Black, Latinx, and Native American residents.

Organizations submitting the complaint are CLAP, National Center for Healthy Housing (NCHH), South Providence Neighborhood Association (SPNA), Direct Action for Rights and Equality (DARE), and Environmental Defense Fund (EDF).

