

District of Columbia
Intended Use Plan for
Infrastructure Investment and Jobs Act
Lead Free DC Funding
Federal Fiscal Year 2025 –2026

The “Infrastructure Investment and Jobs Act” (IIJA) (Public Law 117-58), provided significant funding for the modernization and maintenance of aging infrastructure, including drinking water systems. The IIJA allocates funding to the Safe Drinking Water State Revolving Fund (SRF) program as a Supplemental Base allotment, a Lead Service Line Replacement (LSLR) allotment, and an Emerging Contaminants allotment. This Intended Use Plan (IUP) is submitted for Federal Fiscal Years (FY) 2025 and FY 2026 to identify the projects intended for use by the LSLR allotment and will remain in effect until it is superseded by a new IUP or all funds from the LSLR allotment are spent.

The Safe Drinking Water Act (SDWA) Amendments of 1996 (Public Law 104-182) authorizes a Drinking Water State Revolving Fund (DWSRF) program to assist public water systems in financing improvements needed to achieve or maintain compliance with SDWA requirements and to protect public health. Although the District of Columbia ("the District") is defined as a State for the purposes of the SDWA, Section 1452(j) exempts the District from establishing a SRF program. Therefore, the U.S. Environmental Protection Agency (EPA) provides the District's allotment of federal funds in the form of grants. The District of Columbia Water and Sewer Authority (DC Water) is the grantee for project grants.

The District has a history of lead in drinking water because of its older housing stock and has 60 census tracts that have been identified. Achieving positive health outcomes are critical in the effort to address lead pipes and improve water infrastructure. DC Water has committed to replacing all lead service lines by the Lead and Copper Rule Improvement (LCRI). On June 3, 2021, the DC Water Board of Directors approved [Resolution 21-46](#), June 3, 2021, which approves the Lead Free DC (LFDC) Plan to implement the program and replace all lead, galvanized iron, and brass (if funded) services lines. DC Water has updated the LFDC Plan to comply with the LCRI requirements. In May 2023, DC Water estimated that approximately 42,000 lead service lines (LSL) would be eligible for replacement in the District as part of the LFDC Program. Furthermore, DC Water LFDC prioritization model incorporates water quality and customer needs in the prioritization of LSL replacements using their project planning model. This prioritization model uses demographic and water quality data to prioritize LSL replacements for vulnerable populations most impacted by lead exposure and historically older communities that experience disproportionately poorer health outcomes.

The LFDC Program comprises several LSLR programs detailed below:

The Lead Water Service Line Replacement and Disclosure Amendment Act of 2018, DC Law 22-241, effective March 13, 2019, and amendments set forth in the Lead Service Line Replacement Amendment Act of 2019, DC Law 23-16, effective September 11, 2019, and District of Columbia Water and Sewer Authority Omnibus Amendment Act of 2020, DC Law 23-229, effective March 16, 2021 (collectively called the “Act”), created the two lead service line replacement programs, the

Capital improvements Project and Emergency Repair Replacement (CIPERR) and the Lead Pipe Replacement Assistance Program (LPRAP), funded in part by the District. Through the CIPERR Program, under Section 6019a of the Act, the District provides funding to DC Water to replace lead water service lines on private property, with the consent of the owner, when DC Water is conducting a scheduled or emergency replacement of the lead water service line or the water main in public space. Through the LPRAP Program, under Section 6019b of the Act, the District provides funding that the District of Columbia Department of Energy and Environment (DOEE) and DC Water jointly administer to property owners to replace the partial lead service line on their private property.

DC Water estimates that there are premises with lead service lines that are full lead service lines with lead on both the public side of the property line, maintained by DC Water, and the private side of the property line, maintained by the property owner. DC Water manages the replacement of full lead service lines¹ (in public space and private property) during DC Water's capital improvement projects (CIP) or emergency repair replacements (ERR), CIPERR. Currently, the District and the IJA funds currently provide 100% of the costs to replace the portion on private property. However, when the District funds are depleted, the IJA funds provide 100% of the costs.

Premises that have private side only lead service lines; that is, the lead pipe is only on the private side of the property line and is maintained by the property owner. Private side only lead service lines are the result of previous partial replacements where the lead service line on the public side of the property line was replaced, but the lead service line on the private side was not. Property owners with these partial lead service lines are eligible for the LPRAP, jointly administered by DOEE and DC Water. LPRAP provides financial assistance to eligible residential property owners who elect to replace the private lead water service line when the public portion of the water service line is not a lead water service line in whole or in part.

DC Water is expanding the LSLR program in FY 2025 to include House by House (HBH) Lead Pipe Replacement. Funded by IJA and/or rate payer funds, the HBH program will allow public and private side replacement by household.

For the HBH LPRAP, the property owner or authorized representative of the property owner(s) of the property with an eligible portion of the lead water service line shall submit an application to DC Water. DC Water will determine whether the property has an eligible portion of the lead water service line if it is confirmed that the portion of the water service line on private property and/or the portion in the public space remaining after a partial lead water service line replacement is confirmed to be a lead water service line. The water service line material shall be confirmed by:

- 1) Information on the DC Water's Water Service Information Map;
- 2) Information provided by the residential property owner or authorized representative, or
- 3) Information from the property owner's contractor who completed a test pit.

For the HBH Priority Full Lead Service Line Replacement Program, the property owner or authorized representative of the property owner(s) of the property that meets the priority replacement criteria and has 1) a full lead water service line; or 2) has a partial lead water service line due to an emergency replacement of the lead water service line on private property. DC Water shall determine whether the

¹ DC Water will replace private-only lead service lines if the household is in the project footprint of a CIPERR replacement project, provided the homeowner signs a right of entry authorization form and sufficient District financial assistance is available to fund the costs of that work.

property has a full lead water service line if the portion of the water service line on private property and the portion in public space are confirmed to be a lead water service line. The property owner or authorized representative of the property owner(s) shall submit a LSLR Application and supporting documentation that meets one or more of the following priority full lead water service line replacement criteria:

- Property is occupied by a pregnant or nursing mother;
- Property is occupied by a child under 6;
- Property is occupied by a person with a blood lead level that exceeds the Centers for Disease Control's reference value;
- Property has a lead water level that exceeds the U.S. Environmental Protection Agency's Lead and Copper Action Level;
- Property is a District licensed Child Development Facility;
- Property is a park or recreational facility operated by the District Parks and Recreation or National Park Service, or
- Property performed an emergency replacement of the lead water service line on private property due to a leaking or broken lead water service line on private property.

The Lead Free DC program finally contains the Small Diameter Water Main Rehabilitation Program (SDWMR). The SDWMR program replaces all service lines on a street that are undergoing construction for a water main replacement. DC Water selects water mains for replacement according to their age and condition. Construction crews replace lead service lines when replacing the water main. These efforts will help improve water quality and system reliability, increase water pressure in some areas, and maintain adequate flow throughout the system. The SDWMR mains consist of 12-inch or less in diameter, in various locations within the District. DC Water anticipates utilizing the LSLR funding allotment for lead service lines associated with the SDWMR program.

LONG AND SHORT-TERM GOALS FOR THE USE OF DC GRANT FUNDS

Long-Term Goals

1. Replace all lead service lines, equitably prioritizing replacement in communities.
2. Achieve and maintain compliance with the LCRI and SDWA drinking water standards.

Short-Term Goals

1. Update the LFDC Plan.
2. Routinely evaluate and revise our project prioritization model to replace lead service lines most efficiently, effectively, and equitably select projects that eliminate the public health risk posed by lead service lines, especially for vulnerable populations.

AVAILABLE FUNDS

For purposes of planning, we have assumed the FY 2025, and FY 2026 LFDC allotment is approximately \$28,715,000 for each year.

DISTRIBUTION OF FUNDS

DC Water will replace lead service lines through by-block capital projects under CIPERR, through customer-initiated projects through LPRAP, HBH, and SDWMR. For FY 2025 and FY 2026, the available sources and uses are as follows:

Table 1: Intended Use Plan Project Priority List

Estimated Available Federal Funds			Grant Dollars
Infrastructure Investment and Jobs Act (IIJA) FY 2025			\$28,715,000
Infrastructure Investment and Jobs Act (IIJA) FY 2026			\$28,715,000
Total Estimated Federal Funds (FY 2025-2026)			\$57,430,000
Lead Service Replacement Contracts that maybe submitted for grants during FY 2025 and FY 2026			
Project Priority List			
Contract Name	Contract Type	Target Replacements	Target Dollar Value
Contract 20	Lead Service Replacements	1,466	\$ 35,000,000
Contract 21	Lead Service Replacements	1,466	\$ 35,000,000
Contract 22	Lead Service Replacements	983	\$ 35,000,000
Contract 23	Lead Service Replacements	983	\$ 35,000,000
Contract 24	Lead Service Replacements	804	\$ 40,000,000
Contract 25	Lead Service Replacements	804	\$ 37,926,494
Lead Service Line Replacement Contracts		[FY'25-FY'26]	
Total Lead Service Line Replacement (LSR) Contract Pool		6,506	\$ 217,926,494

- A. **LSR Contracts:** Of the Lead Service Replacement contracts that are dedicated to the CIPERR Block-by-Block program, the District and IIJA funds currently cover the costs to replace the portion on private property until the District funds are depleted and the IIJA funds cover 100% of the costs. **All replacements are completed at no cost to the homeowner.**
- B. **LPRAP:** Lead Pipe Replacement Assistance Program is customer-initiated By-Premise Lead Service Line Replacement. LPRAP is a District Funded program that assists homeowners with the cost of private side partial replacements.
- The allocated costs for LPRAP referenced in Table 1 will be used for homeowners with Standard Assistance to cover the remaining costs above the LPRAP reasonable caps.
 - Therefore, **ALL homeowners enrolled in LPRAP will receive a 100% discount on their private service line replacement.**
 - Income-Eligible Assistance* - entire service replacement paid for by DOEE
 - Standard Assistance* - entire service replacement paid for through a combination

of District and DC Water IJA funds. The District will cover the 100%¹ replacement costs up to \$2,500 and DC Water IJA will cover the costs above the reasonable caps, previously the homeowner's responsibility.

- c. Any public side costs incurred during the private side replacement (e.g., test pit reveals a full-service line instead of partial), will be paid for using the Voluntary Full Replacement Program (VFRP) contract and rate payer funds.

C. House by House Program (HBH): The HBH program allows lead service line replacement by households upon request. The HBH program is designed to allow DC Water customers the ability to receive replacements funded by IJA and rate payer funds.

D. Small Diameter Water Main Rehabilitation Program (SDWMR): The Small Diameter Water Main Rehabilitation Program (SDWMR) replaces all lead service lines on a street that are undergoing construction for a water main replacement. Program costs are funded by the Small Diameter Water Main federal grants and rate payer funds.

CURRENT PROGRAM COST ESTIMATE

DC Water will utilize IJA funding for costs associated with private-side and public-side lead service line replacement (LSLR) work with a focus on private-side replacement. DC Water conducted a cost analysis of planned LSLR work located in communities. The data includes all the LSLR programs under DC Water's Lead Free DC (LFDC) program based on total lead removal by the rule deadline. The total planning level cost estimate as of March 2025 for the LFDC program is \$1.8B, where 23% of the costs are for private-side work (Table 2). The planning level cost estimate will continue to evolve based on new and planned contracts for replacement projects.

Table 2: LFDC Private-side and Public-side Costs

	(\$)	%
Total Cost of LFDC Program (March 2025)	\$1,850,779,441.00	
<i>Private-side Cost</i>	\$431,942,816.00	23%
<i>Public-side Cost</i>	\$1,418,836,625.00	77%

Generally, the lead service lines in the District of Columbia are concentrated in old neighborhoods that do not significantly overlap with other communities. Therefore, DC Water compared the overall funding provided in the IJA for lead replacement with the estimated cost of work within older communities.

The total planning level cost estimate for the program is \$1.8B. The total estimated cost in older Areas is \$219,925,998.33, about 152%. See Table 3.

Table 3: Total Program Costs in Older Areas

Total Cost of LFDC Program (March 2025)	\$1,850,779,441.00	
Total Costs for LFDC Work in Older Communities	\$219,925,998.33	152%

Of the \$219M of work in older communities, about \$48M (22%) will be used to complete private

side work, and \$172M (78%) will be used to complete public side work. The total cost of public side and private side work in older communities is about 152% of the total IJA funding.