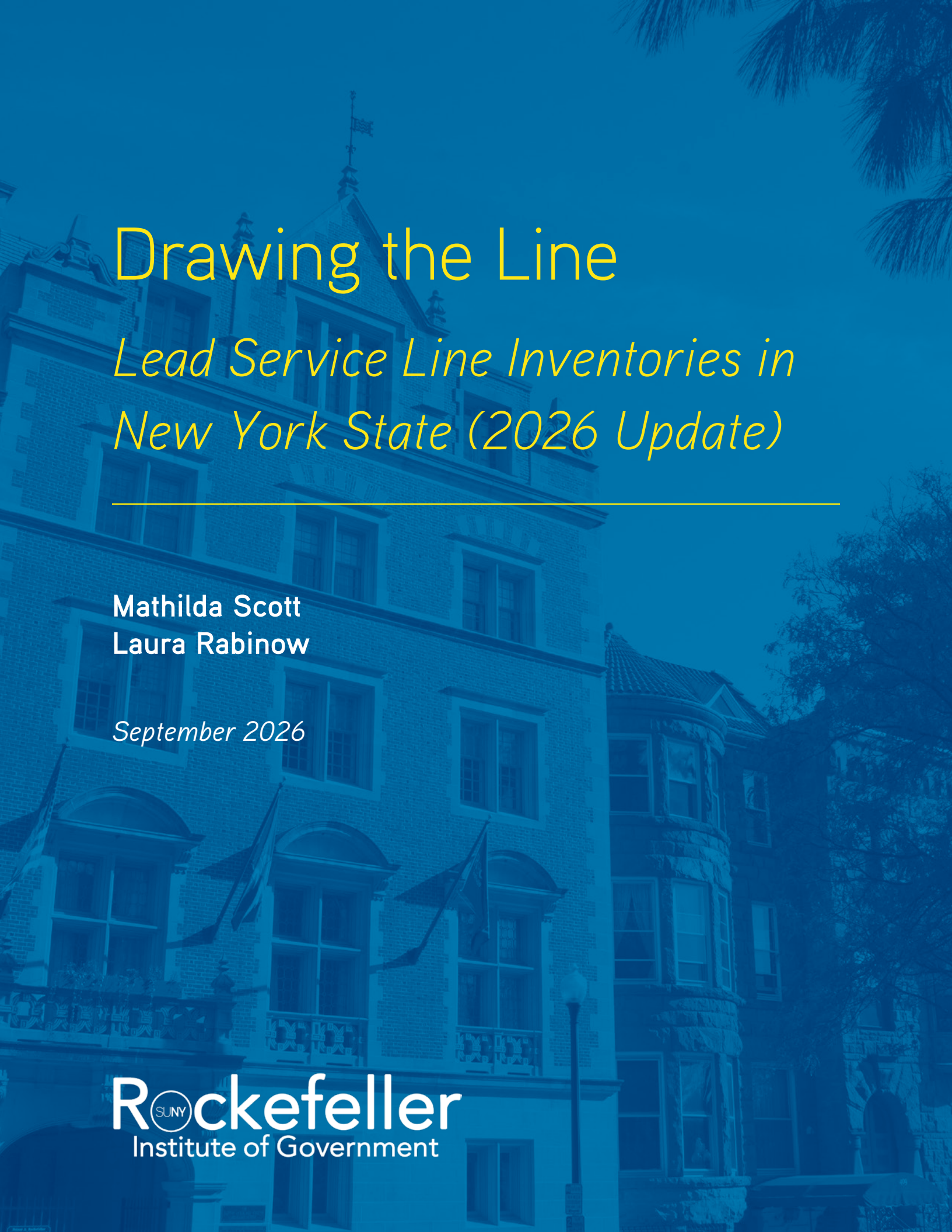




Drawing the Line

Lead Service Line Inventories in New York State (2026 Update)

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Drawing the Line

Introduction

As discussed in our September 2025 report, *Drawing the Line: Lead Service Line Inventories in New York State*, the harms of lead exposure have been well documented for many decades, including at very low levels and particularly for children.¹ The federal health-based goal for lead in drinking water is 0 µg/dL (i.e., none).² Service lines—pipes that connect homes and buildings to municipal water systems—that are made of lead are known to be a common source of exposure when they corrode and lead enters the drinking water supply.

Exactly how many lead service lines (LSLs) exist in New York or other states and, as importantly, where they exist in each state remained a very incomplete picture throughout the 20th and early 21st century, as documentation of this infrastructure has varied widely by water system and over time. While estimates ranged considerably, the Environmental Protection Agency's (EPA) 2023 estimate of the number of LSLs in use across the United States was 9.2 million.³ This included nearly 500,000 (494,007) LSLs in New York State, which was the sixth-highest estimate among states and represented 5.38 percent of the national total. While this is generally consistent with New York's large population, it also indicated the relative and potentially significant work and resources that would be needed to remove LSLs in the state.

Over the last few years, federal rulemaking has established new requirements for water systems aimed at identifying and removing LSLs to reduce lead exposures through drinking water. One of those new requirements was for drinking water systems to produce an initial service line material inventory by October 16, 2024, and to complete a baseline inventory by November 1, 2027.⁴

Our earlier report analyzed the initial data submitted by water systems for the inventories to the New York State Department of Health (DOH) and made public as of July 2025.⁵ This new report updates our analysis with data made public by DOH through July 2026 and examines the progress that has been made during the past year. In doing so, it examines both the advancements and challenges related to submitting inventories, identifies the total service lines that are known, how many are made of each material, and, more specifically, considers how many of those identified so far are made of lead or other materials that will need to be replaced.

As discussed below, this analysis reflects a substantial decrease in the number of missing systems, from 243 in July 2025 to 52 in July 2026. Most of these newly included inventories were from small drinking water systems or new water systems (or both). Alongside this, our updated analysis reflects that the status of more than 800,000 service lines across New York State remains unknown, meaning inventories do not classify them into one of the material categories, and it is still unclear if they need to be replaced. Consequently, current service line inventories represent both progress toward completing inventories and continue to present an uneven and incomplete picture, with significant variation in both data quality and the distribution of LSLs and galvanized service lines requiring replacement (GSLRRs) across communities. Although New York’s overall service line landscape remains partially understood, analyzing this available data can provide valuable insight into the challenges of completing service line inventories in the short term (by the deadline in November of 2027), meeting regulatory requirements for replacements over the next decade, and better protecting public health in the long run.

Federal Regulatory Requirements

In 2021, the EPA first published proposed revisions to the 1991 Lead and Copper Rule, known as the Lead and Copper Rule Revisions (LCRR).⁶ It then issued further guidance in 2022 directing water systems to develop an initial lead service line material inventory by October 16, 2024, at which time further regulatory actions were anticipated.⁷ At our November 2023 symposium with New York State stakeholders and policymakers, we discussed the anticipated opportunities and challenges with respect to implementing the guidance and further potential rulemaking.⁸ While perspectives varied, most stakeholders agreed then on the importance of removing LSLs, but were concerned about the necessary resources and authority it would take to accomplish that goal. When the subsequent Lead and Copper Rule Improvements (LCRI)⁹ was proposed in late 2023, our report, *Leading on Lead*, discussed what these regulatory changes would look like, the history of the rule and of LSLs more broadly, and the rule’s basis in medical, environmental, and public health science.¹⁰ We also made policy recommendations for New York and other states, based both on what was and was not yet known about the distribution of LSLs and how the rule would ultimately be implemented. Among other recommendations, we noted that policymakers and state departments of health should:

... make data on lead testing for drinking water and LSL material inventories publicly accessible in ways that allow for data to be easily analyzed and to facilitate continually updated projections of progress and resource needs at the local and state levels.

As is discussed later in this report, New York State made further efforts shortly thereafter to do just that through enacting the Lead Pipe Right to Know Act (LPRKA). In 2023, the EPA then proposed further changes to the LCRI,¹¹ which were finalized in 2024.¹² Among other key provisions, these improvements further directed most water systems to begin replacing LSLs by 2027 and to replace all LSLs under their control over the subsequent 10-year period (unless they are required to sooner by their state or have a deferred deadline).¹³ It also maintained the requirement for initial lead service line inventories to be completed by October 16, 2024. As referenced above, the rules required that covered systems—those federally defined as Community Water Systems and Non-Transient Noncommunity Water Systems—submit their “initial inventory” to the respective state’s Department of Health, including all service lines regardless of ownership, by that date and update their inventory annually thereafter. Additionally, by November 2027, systems are required to complete a “baseline inventory” that includes updated and further data, such as the material of connectors that join parts of service lines.

Water Systems Required to Submit Inventories

COMMUNITY	NON-TRANSIENT NONCOMMUNITY
A public water system that (a) serves at least 15 service connections used by year-round residents of the area served by the system; or (b) regularly serves at least 25 year-round residents.	A noncommunity water system that serves the same people more than six months per year, but not year-round. Schools, colleges, hospitals, and factories with their own water supplies are examples of non-transient noncommunity water systems.

SOURCE: “[Drinking Water Program: Frequently Asked Questions](#),” New York State Department of Health, updated May 2024.

Water systems are required to make their inventories publicly accessible, which may be accomplished in a variety of ways, but those serving over 50,000 people are required to make theirs available online (as discussed below, New York State law has expanded that requirement). Thus, for many smaller systems, only the summary-level information outlined below is accessible online, as required federally. The EPA has further issued guidance and technical documents,¹⁴ templates, and fact sheets¹⁵ for states and systems that outline these requirements, how to communicate them with stakeholders, and how to submit them to regulatory authorities.

There are two levels of data that water systems are required to provide to regulators: (1) the full inventory of data for each specific service line, and (2) the high-level or summary data for the water system with the totals for each data point collected across the system.

The full inventories are required to provide location information for each service line and categorize service lines or portions of the service lines (be they privately or publicly owned) in particular ways with respect to their material composition.¹⁶ This is required regardless of a system's size and whether or not the inventory itself needs to be made available online or can be made publicly accessible in some other way. The material categories for service lines level data (or portions of service lines) in the full inventory include:

- **Lead.**
- **Galvanized Requiring Replacement (GSLRR).** A galvanized service line designated as GSLRR is one that is or ever was downstream of an LSL or is currently downstream of an unknown service line.
- **Non-Lead.** The rule specifies that a service line is non-lead when “the service line is determined through an evidence-based record, method, or technique not to be a lead or galvanized requiring replacement service line. Water systems are not required to identify the specific material of a non-lead service line; however, they may use the material (e.g., plastic or copper) as an alternative to categorizing it as ‘Non-Lead.’”
- **Lead Status Unknown, or Unknown.**

For connectors that join service lines or parts of service lines, they include:

- Lead
- Non-Lead
- Unknown
- No connector present

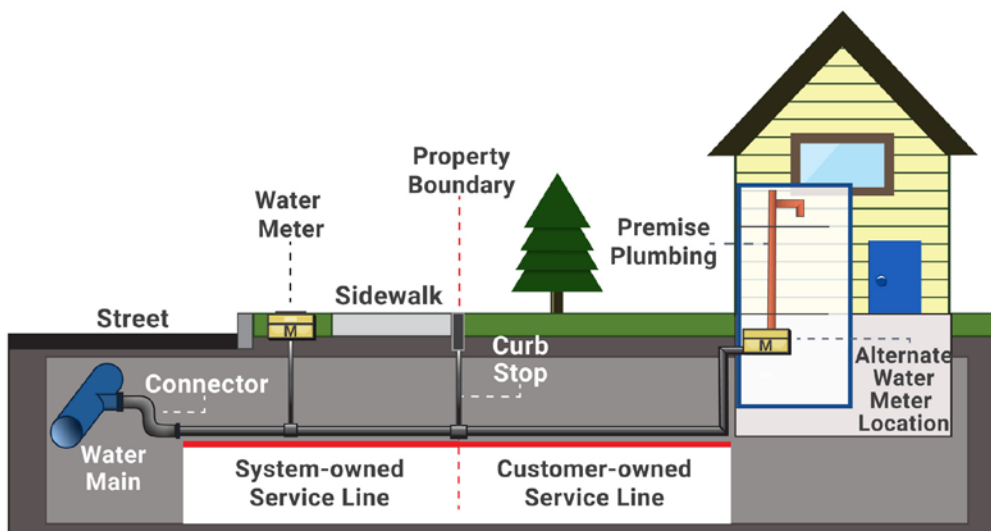
The classification of a service line as a whole is determined by the presence of lead in service lines or any service lines of unknown material. As such, if any portion of the service line is determined to be lead or GSLRR, the classification for the entire service line is lead. Likewise, if any portion is lead status unknown, even if the rest of the service line is non-lead, the classification for the entire service line is lead status unknown. With respect to the summary level data, each inventory and its updates must include the total number of:¹⁷

- lead service lines in the inventory;
- service lines that are GSLRR;
- lead status unknown service lines in the inventory;
- non-lead service lines in the inventory;

- lead connectors between lines in the inventory;
- connectors of unknown material in the inventory;
- replacements for full lead service lines and full GSLRR that have been conducted in each preceding program year; and
- partial lead service line replacements and partial GSLRR replacements that have been conducted in each preceding program year.

Only if a system has no lead, GSLRR, or lead status unknown service lines, as well as no lead or unknown connectors, comply with the rule by issuing a written statement of service line composition instead of making their inventory data publicly available, though such submissions require later validation. In our analysis below, these inventories are not counted as missing, since they are in compliance.

FIGURE 1 | EPA Fact Sheet for Developing and Maintaining a Service Line Inventory



SOURCE: [Fact Sheet for Developing and Maintaining a Service Line Inventory](#) (Washington, DC: US Environmental Protection Agency, June 2023).

New York State Law and Legislation

In 2023, the New York State Legislature and Governor Kathy Hochul enacted the Lead Pipe Right to Know Act (LPRKA).¹⁸ The Act required water systems to submit service line inventories and inventory summary forms (that the DOH was charged with developing) by October 16, 2024—the same date as federally required for the initial inventories—and to provide subsequent annual updates. The state reporting requirements were more expansive than the federal requirements for that date. New York required the inventories to include connectors or “goosenecks” at this earlier date and required more systems to make their inventories available online—specifically, all systems serving 10,000 or more people, compared to the federal threshold of 50,000, and any water system that operates its own website. Local health departments were also required to link to the state DOH’s website for the inventories and their summaries.

These service line inventories were further required to be available to the public on the DOH website in the form of an interactive map or maps for systems serving over 10,000 and less than 2 million (New York City has its own map). The mapping, which is required by October 2026,¹⁹ must include the material classification (including both public and customer-owned portions of the service line), street address, verification method, and the map must be color-coded to designate material classification. Additionally, the maps must be updated at least once per year. Because DOH’s map does not provide the public water system (PWS) identification number, it is difficult to determine exactly how many systems are included in this map.

Our 2023 report and symposium also examined questions and concerns from systems in New York about potential legal and logistical challenges to funding and implementing LSL replacements. During and since that time, there have been further clarifications by state officials and lawmakers related to those questions. In 2023, as part of the state budget, the legislature and governor enacted a provision establishing a period of probable usefulness for localities bonding for LSL replacement of 30 years, further enabling the use of funds from the federal Bipartisan Infrastructure Law at that time. The period of probable usefulness is the maximum amount of time for which an entity—in this case, a water system—can finance something by issuing debt to ensure it is paid off during the time in which the thing being financed is still useful. This period is specified in state law for a number of items that are commonly bonded for locally, like bridges, sewers, vehicles, and other water system projects.

In 2024, the Office of the State Comptroller also issued an opinion with respect to funding LSL replacements in Troy, New York, through the Environmental Facilities Corporation (EFC) with monies from the Bipartisan Infrastructure Law.^{20, 21} The opinion concluded that the city’s bond issuance for such purposes was constitutional (with respect to the state constitution’s gift and loan clause, as detailed in our prior report).

Federal Legislation and Legal Challenges

In the recent context of uncertain and proposed federal funding and policy shifts, state lawmakers are also considering solidifying LCRI provisions in state statute. In January and February 2025, Republican congressional representatives introduced H.J. Res. 18²² and H.J. Res. 44,²³ respectively, aimed at voiding the Lead and Copper Improvement Rule. In March 2025, the Trump administration delayed more than \$50 million in funding that was appropriated to replace LSLs in Massachusetts.²⁴ This funding was from the Bipartisan Infrastructure Law and was announced in May 2024.²⁵ Advocacy groups and Massachusetts elected officials voiced their opposition to this delay and stated that this hold-up is unnecessary, puts public health at risk, and will make it hard to comply with the 10-year replacement timeline.^{26, 27} Neither of these resolutions became law, and as of July 2026, the EPA continues to implement this rule and has begun rolling out the previously paused funding.²⁸ Relatedly, in April 2025, the federal Centers for Disease Control (CDC) also fired the staff of the Childhood Lead Poisoning Prevention Program, who worked on source detection and exposure response.²⁹ The state attorney general of Massachusetts, along with 21 other states' attorneys general, co-led by New York Attorney General Letitia James, filed suit challenging related funding cuts by the Trump administration, including funding to protect clean drinking water in their suit.³⁰ As of July 2026, there has not been a final decision on this lawsuit but, in separate lawsuits, a federal judge issued a preliminary injunction, preventing the administration from implementing a government-wide freeze on congressionally appropriated grants and loans while the litigation proceeds.³¹ Despite these challenges, the LCRI requirements have been maintained under the current administration, though more recent guidance from the EPA has been criticized as outlining "flexibilities" that may undermine full compliance with the rule.³²

In the context of shifting federal funding and guidance, some lawmakers have been working to solidify LCRI provisions in state law. New York State lawmakers introduced a bill entitled The Lead Pipe Replacement Act (S6892/A7878 of 2025–26) to codify the requirement to replace all LSLs by 2037.³³ The bill was amended in May 2026 but did not get a vote in committee in either chamber. The bill would require replacement regardless of ownership, authorize water systems to access all service lines for the purposes of identifying and replacing those lines, and require the replacement "at no direct charge to any customer with a lead service line" (not including revenue raised through increasing the water rate). The amended bill would also require reporting on which LSLs remain in the ground after replacement activities.³⁴

The legislation would provide customers with the option of facilitating the system's replacement of the line or replacing their privately-owned portion at their own expense within 45 days while the system replaces the rest of the line. If they don't notify the system of their intent to do either, the system is then directed to seek access to the property from any noncustomer occupant (e.g., another family member in the same household or a tenant) in order to replace all portions of the LSL. In the case where such an occupant can't be identified, the bill provides that the water system entering the property in good faith shall be held harmless and is not liable for any resulting damages. This provision appears to be modeled after existing local laws like that of

Newark, New Jersey,³⁵ which successfully replaced all of its 23,000 LSLs in a three-year period.³⁶

There have also been recent legal challenges to the LCRI. Water utility organizations, including the American Water Works Association (AWWA), challenged the LCRI in federal court, arguing that portions of the rule exceed EPA's statutory authority and impose significant costs on utilities.³⁷ In fall 2025 and spring 2026, parties submitted briefs for this case, and arguments will take place later this year.

Recent Updates

Between our first report and July 2026, there have also been notable announcements related to the funding landscape of LSL replacements in New York. In November 2025, Governor Kathy Hochul announced nearly \$66 million in grants through the Lead Infrastructure Forgiveness and Transformation (LIFT) program to help communities across the state identify LSLs, replace lead pipes and service lines, and other projects that improve drinking water infrastructure.³⁸ This funding specifically targeted historically disadvantaged communities where the median household income was less than 80 percent of the regionally adjusted statewide median household income, communities with local higher poverty rates than the state average, or where at least 50 percent of the LSLs serve an environmental justice community. Additionally, in June 2026, Governor Hochul announced a new round of water infrastructure funding, which was provided for in the enacted state budget, with \$127.5 million allocated for the identification and replacement of lead service lines.

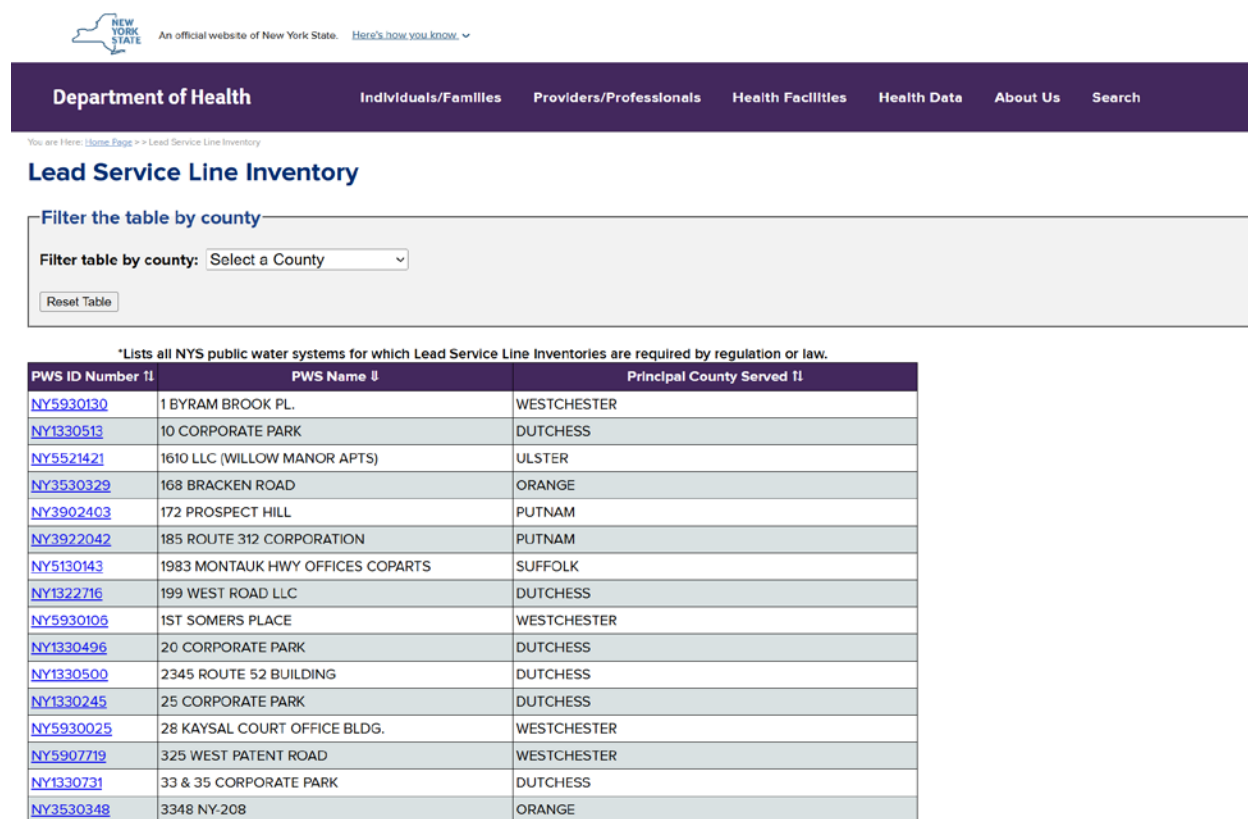
As referenced above, our previous report from September 2025 found 243 missing inventories and an incomplete dataset, which prevented us from getting an accurate and complete picture of New York's LSL landscape. The initial data also showed that the LSL burden was uneven across the state. Our report further outlined some challenges stakeholders identified in completing LSL inventories, including limitations with historical records, staffing and technical capacity constraints, challenges with inventory reporting and replacement, and difficulties identifying unknown service lines and accessing privately owned portions of service lines.

In January 2026, following our 2025 report and data analysis of the initial lead service line inventories submitted in New York, the State Comptroller's Office also released an audit outlining the challenges DOH has faced implementing the Lead Service Line Replacement Program—the program that provides municipalities with grants to replace LSLs.³⁹ This audit found that DOH did not implement sufficient controls, which limited the program's effectiveness, and that DOH did not ensure that all covered water systems submitted a complete and accurate service line inventory in compliance with State and federal requirements by the October 16, 2024, deadline. It is important to note that while systems were required to submit an inventory by the October 16, 2024, deadline, they were not required to have complete inventories (that identified the materials for every service line) at that time. Under the LCRI, baseline inventories are due November 1, 2027, and these inventories require every service line to be accounted for and classified into one of the EPA's categories (lead, GSLRR, non-lead, or unknown). Additionally, as our report reflected, this audit also found that there were accuracy issues with the data that was reported.

Methodology and Challenges

There are significant challenges to using the publicly available service line inventories to create a holistic portrait of New York's total number and distribution of LSLs. This is partly due to the disparate and incomplete manner in which the data are made available. Each inventory's summary data is located on a separate webpage, which then includes further information about how to access the inventory itself. A list of the inventories with links to each summary page does appear on a single site,⁴⁰ but the link to that site is not prominently displayed elsewhere. Instead, users must navigate from the Drinking Water Protection Program to New York's Public Water System page, then open a drop-down section on Drinking Water Data and click a subsequent link to Explore Public Water System Lead Service Line Inventories.⁴¹ This structure silos information for each system, making higher-level analysis very challenging for most users. To remedy this limitation, we scraped the data from each individual system's page and then combined that data into a larger spreadsheet. We merged the scraped data with community contact or noncommunity contact lists publicly posted on the DOH website to determine the population each system serves. There are 29 systems out of those referenced above with a public water system identification number that do not match the community contact or noncommunity contact. We manually sorted these systems into NTNC or community classifications, and because of their small service line numbers, we sorted them as small systems, except for Rotterdam Water District 5, which we classified as a medium-sized water system.

FIGURE 2 | Screenshot of Lead Service Line Inventory



Department of Health Individuals/Families Providers/Professionals Health Facilities Health Data About Us Search

You are Here: [Home Page](#) > > Lead Service Line Inventory

Lead Service Line Inventory

Filter the table by county

Filter table by county:

[Reset Table](#)

*Lists all NYS public water systems for which Lead Service Line Inventories are required by regulation or law.

PWS ID Number ^{†1}	PWS Name [‡]	Principal County Served ^{†1}
NY5930130	1 BYRAM BROOK PL.	WESTCHESTER
NY1330513	10 CORPORATE PARK	DUTCHESS
NY5521421	1610 LLC (WILLOW MANOR APTS)	ULSTER
NY3530329	168 BRACKEN ROAD	ORANGE
NY3902403	172 PROSPECT HILL	PUTNAM
NY3922042	185 ROUTE 312 CORPORATION	PUTNAM
NY5130143	1983 MONTAUK HWY OFFICES COPARTS	SUFFOLK
NY1322716	199 WEST ROAD LLC	DUTCHESS
NY5930106	1ST SOMERS PLACE	WESTCHESTER
NY1330496	20 CORPORATE PARK	DUTCHESS
NY1330500	2345 ROUTE 52 BUILDING	DUTCHESS
NY1330245	25 CORPORATE PARK	DUTCHESS
NY5930025	28 KAYSAL COURT OFFICE BLDG.	WESTCHESTER
NY5907719	325 WEST PATENT ROAD	WESTCHESTER
NY1330731	33 & 35 CORPORATE PARK	DUTCHESS
NY3530348	3348 NY-208	ORANGE

The summary data can be analyzed at the system, county, and state level, with further inventory data available for those large systems serving over 50,000—but not for most of those serving over 10,000 at this time. It should be noted that while the DOH did provide a combined mapped version of inventories with downloadable data,⁴² which included only service line-level data and omitted which water system each service line was a part of, this unfortunately does not enable a water system-level analysis. The map also appeared to have data linked to locations out of state, though it wasn't clear why. In light of these challenges, we focus primarily on the system-level inventory summaries in our analysis. In addition to this data analysis, we spoke with stakeholder groups related to water systems, public and environmental health advocacy, and service line inventory research efforts. These conversations were aimed at understanding the challenges surrounding inventory completion and the process of producing the inventories. Their perspectives helped us formulate recommendations to best address the challenges observed in the initial inventory analysis.

New York State Inventories So Far... Statewide Data

As of July 2026, in DOH's list of inventories, there are 2,927 covered water systems that are required to submit inventories.^{43, 44} This list also includes both community systems, which are used by year-round residents, and non-transient noncommunity (NTNC) systems, which serve locations like schools, hospitals, and worksites. Of those systems listed by DOH, 52 are missing links to their inventory summary, meaning they do not currently have a submitted inventory, leaving 2,875 systems with submitted inventories. Of those submitted, 677 are for NTNC systems, and 2,198 are for community systems. Thus, while there are still missing systems, there are far fewer than a year ago—52 community and NTNC systems in July of 2026 in publicly available data compared to 243 in July of 2025. These remaining gaps primarily reflect small systems or new systems coming into service. DOH continuously updates the publicly available inventory data—thus, even since July of 2026, the inventories for more systems have been made publicly available (which will be included in our report next year).

Of the water systems across the state that have submitted an inventory that was publicly available as of July 2026, there are 31 large community systems that serve 50,000 or more customers and 115 community systems and two NTNC medium systems that serve between 10,000 and 50,000 customers. The remaining 2,036 community and 662 NTNC systems serve less than 10,000 customers each. These small systems make up the majority of the additional data that was submitted over the past year. In the 2025 report, the inventory data included only 1,894

Thus, while there are still missing systems, there are far fewer than a year ago—52 community and NTNC systems in July of 2026 in publicly available data compared to 243 in July of 2025..

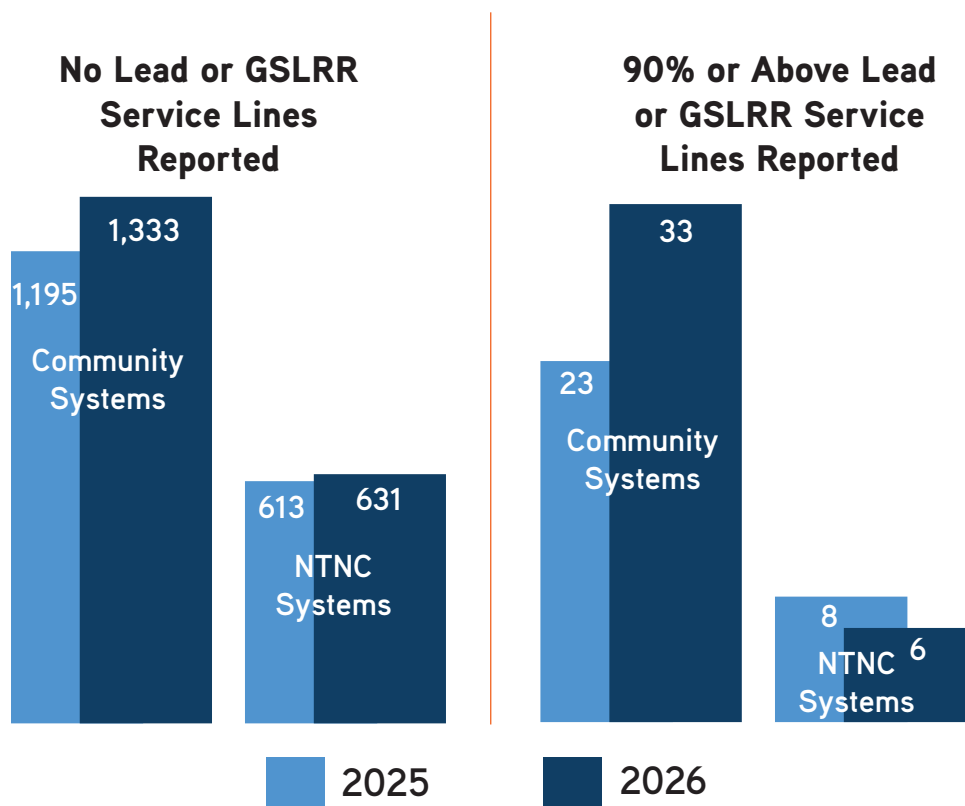
small community systems, compared to the 2,036 small community systems with inventories included as of July 2026. There are 29 systems out of those referenced above with a public water system identification number that do not match the community contact or noncommunity contact lists publicly posted on the DOH website. Across the 2,875 community water systems that are listed with working links to inventories, there are 3,809,538 service lines reported to exist.

Across the 662 submitted NTNC inventories, there are 3,206 service lines. Across both NTNC and community inventories, there are a total of 2,933,631 service lines that have been “identified,” meaning that their material has been identified as lead, GSLRR, or non-lead. When subtracted from the total service lines reported to exist, this leaves 878,038 lines left to be identified as lead, GSLRR, or non-lead across community and NTNC water systems that have submitted an inventory.⁴⁵ This is a decrease of roughly 59,000 lines since last year’s analysis (which showed 937,032 unknown service line materials), but reflects that a significant number of service lines’ materials must still be identified by the November 2027 deadline.

Out of those 2,933,631 service lines in the inventories for community and NTNC that have been identified already, there are 245,708 (8.35 percent) that have been identified as lead (with NTNC systems reporting zero LSLs) and 40,836 (1.39 percent) that have been identified as GSLRR across community and NTNC systems. Thus, as of July 2026, in total, there are 286,544 service lines that are in need of replacement with 878,038 lines still needing to be identified, and 52 systems that do not yet have a publicly available or submitted inventory.

These small systems make up the majority of the additional data that was submitted over the past year. In the 2025 report, the inventory data included only 1,894 small community systems, compared to the 2,036 small community systems with inventories included as of July 2026.

FIGURE 3 | New York Communities and NTNC Systems Lead Reports, 2025 and 2026



Small Water Systems

While the Lead and Copper Rule Revisions require that each system's service line material inventories be made publicly available, as noted above, only systems serving over 50,000 people are required to provide their inventories online under the federal rule, and those serving 10,000 and up or with their own website are required to do so under the state's Lead Pipe Right to Know Act. There are 2,036 community systems and 662 NTNC systems, or 2,694 in total, that serve under 10,000 customers with submitted inventories. This accounts for about 92 percent of systems serving 2,154,358 New Yorkers or about 10.77 percent of the state population. Across such smaller systems, there is a wide range in the percentage of identified service lines and a large variance in the number of service lines that will need to be replaced. Ninety-four community and 16 NTNC systems, or about 3.8 percent of systems, have less than two percent of service lines identified. Comparatively, 1,386 community and 631 NTNC systems, or around 70.2 percent of systems, have all service lines identified. This is an increase from the 1,234 community and 597 NTNC systems that were fully identified in the July 2025 data.

Out of the total 2,698 small systems with submitted inventories, there are 334 community systems and 31 NTNC systems that have reported no lead or GSLRR service lines so far but are reporting some amount of unknown service lines yet to be identified as lead, GSLRR, or nonlead. Additionally, there are 1,333 community and 631

NTNC systems that have reported no lead, GSLRR, and no unknown lines, meaning they have completely identified all lines and (pending further validation per regulations) have none that are required to be replaced. This is an increase from the 1,195 community and 613 NTNC systems that were completely identified and have no lead or GSLRR in the July 2025 data.

At the other extreme, 33 community and six NTNC systems reported 90 percent or above lead or GSLRR service lines out of their total identified service lines. This is an increase in the 23 community systems that had 90 percent lead or GSLRR out of the total identified service lines from the July 2025 data. This is also a decrease from the eight NTNC systems that reported 90 percent lead or GSLRR out of the total identified service lines from the July 2025 data.

Smaller systems have made their inventories available in a variety of ways, including at physical locations, by providing different forms of contact information to reach out to an individual or entity, online inventories, and, in some cases, blank/missing information on how to access the inventory. These include, for example:

- A system at a church that put their inventory for five service lines online.⁴⁶
- A system that said to contact the village and gave a phone number and address.⁴⁷
- A village that left the answer for how to access their inventory blank.⁴⁸
- A village that stated the inventory was “available at Village DPW.”⁴⁹
- A system that stated their inventory was “Available at Town Hall.”⁵⁰
- A system owned by an LLC, seemingly of premanufactured homes, that listed the inventory as available on the “Community Board.”⁵¹
- A state park that listed it as “available upon request from Park Manager.”⁵²

These examples reflect the patchwork of ways that systems are maintaining their inventories and making them available to the public. Having different ways to access inventory information may reflect the available resources and technical capacity of systems and could be tailored to resident and user needs; however, the lack of consistency may also present challenges in accessing the information.

As noted above, the only systems that do not need to provide some form of public inventory to comply with the rule are those with no lead, GSLRR, or lead status unknown service lines, as well as no lead or unknown connectors. For example, a system for manufactured homes in Broome County complied with the rule by stating in writing that the “PWS [public water system] has visually confirmed no LSL, GSLRR, or unknown SLs. Public LSLI is not required.”⁵³

Other systems that similarly had no lead, GSLRR, or unknown materials responded with less direct written statements of service line composition. For example, some systems linked back to the DOH’s general website⁵⁴ or linked back to their own town’s website⁵⁵; stated “TBD/Give to school admin,”⁵⁶ “via crawlspace under each home,”⁵⁷ or “Main Office bulletin board, staff break room”⁵⁸; gave a name and email to contact⁵⁹ or listed a phone number to call⁶⁰; or left their answer blank.⁶¹ Given that there were no lines in need of replacement identified in these systems (pending any necessary verification),

these particular instances of data variation are not of great concern. However, they do serve to further illustrate the broader need for communication or technical support to clarify the reporting process, reporting methodology, and requirements for systems and to conduct data validation for accuracy and consistency.

Across these systems, there was considerable variation in the percent and number of unknown (unidentified) service line materials, as well as those identified that were lead or GSLRR and therefore in need of replacement. As reflected in the statewide data, there were sometimes discrepancies within systems between the total numbers of service lines and the sum of those identified and those unknown. For example, the Village of Theresa reported identifying 239 service lines but stated that there were 334 non-LSLs. Other systems report values in the breakdown for public-side service lines and customer service lines, which in sum do not equal the total given (as in Benton Water District #3 in Yates County, which stated there were 91 identified service lines but indicated that there were zero in each of the categories of materials, including unknown). Some systems further had an error message displayed on the DOH service line inventory (like the Town of Carlton, which noted 171 identified lines but similarly reported zero across all material categories). While others reported different total numbers of service lines on different portions of the inventory form (such as the Community at Bells Pond, which stated that there were 133 identified lines but indicated that there were zero in each of the categories of materials, including unknown, and later in the summary stated there are 151 total service lines). These discrepancies may, in some cases, reflect simple data entry errors or the need for further technical support and resources at the system level. Taken together, they further highlight underlying challenges for data management and validation at the state level that, likewise, may benefit from further support and technical capacity.

Medium Systems (Serving 10,000–50,000)

Across the state, there are 117 systems that serve between 10,000 and 50,000 customers. Two of these systems are NTNC systems, and the remaining 115 systems are community water systems. Similar to small systems, there is a wide range in the percentage of service lines identified, from just over 2 percent in Long Beach City to 100 percent reported as identified in 26 of the medium systems. There are also significant differences in the composition of identified lines. Of the fully identified systems, all except Cornell University,⁶² City of Cohoes,⁶³ and Westbury Water District⁶⁴ have zero lead or GSLRR service lines; these three systems each have less than two percent lead or GSLRR reported. This is, however, in contrast to other systems like the City of Poughkeepsie, which has over 99 percent of service lines identified and over 80 percent of these identified lines are lead or GSLRR. According to the New York State Lead Right to Know Act, for all systems serving 10,000 or more customers, DOH must make the information from the service line inventories available to the public on the department's website in the form of an interactive map or maps by October 2026 unless a system maintains its own map. Currently, 30 such systems provide interactive maps; of the remaining systems, 14 post the full LSL inventory or a spreadsheet listing all addresses and the service line materials, 15 are blank, and the rest have written-in responses as to how to access their inventory (in some other way).

These written explanations for how to access service line inventories varied substantially across the 70 systems that have not yet provided an inventory online. Of the systems that noted that their inventories would be posted on the town/local government website, this resource was not available where indicated for 18 of them (at least not at the time we looked on July 1, 2026). Other systems provided a physical address where the public could access a printed copy, and still others reported unique forms of access, including being “accessible by visiting the public computer on the second floor of City Hall”⁶⁵ (City of Lockport) and through “a dedicated phone number and email to be utilized for service material inquiries” (City of Poughkeepsie),⁶⁶ though the contact information for the latter was not yet provided.

These medium systems thus reflect considerable variability in their inventories, forms, and progress towards making them accessible to the public—though this may continue to shift as the deadline of November 2027 approaches. This variability may in part reflect the availability of resources, personnel, and technical capacity of systems, and other areas where further support may be helpful.

As noted above, inventories are required to be mapped on the DOH website if they serve above 10,000 and less than 2 million (New York City has its own map). The mapping, which is required of DOH by October 2026,⁶⁷ must include the material classification (including both public and customer-owned portions of the service line), street address, verification method, and the map must be color-coded to designate material classification. Again, because the DOH map does not provide the PWS ID number and there are slight variations in the PWS name, it is difficult to match the exact name of systems and to determine which systems are included on the DOH website’s map. Additionally, 33 of the medium-sized systems currently have their own publicly available map of the system’s service lines or a PDF of addresses with identified service lines.

Large Water Systems (Serving over 50,000)

We have more closely examined the large water systems that serve more than 50,000 people, given the requirement for them to have an online inventory available and the extent to which they have already complied.

There are 31 large public water systems in New York and, as of July 2026, 27 had a publicly available map of their service lines. Two systems, Jericho Water District and City of White Plains, did not yet have a map and reported zero or near-zero lead or GSLRR lines—with 99 percent and 71 percent of service lines identified, respectively. Further, two additional systems, City of Yonkers and Latham Water District, provided datasets of addresses and associated service line materials that were not mapped.

With respect to the wide variation in the percent and number of lines whose material has been identified or is unknown, some large systems had both a relatively high percent of service line materials that were already identified, and a relatively low percent of those identified that were lead or GSLRR, and therefore in need of replacement. Seven systems had less than 10 percent unknown, and of those, two had a rate of lead and GSLRR above 2 percent. For example, the Jericho Water District on Long Island has

reported over 99 percent of its service lines as identified and less than 1 percent of those that are lead or GSLRR. Similarly, ECWA Amherst in western New York has reportedly identified nearly 94 percent of service lines, less than 0.3 percent of which are lead or GSLRR.

Other large systems had a relatively large percentage of unknown service line materials yet to be identified as lead, GSLRR, or non-lead. The Niagara Falls Water Board, for example, had a reported 18,182 total service lines, over 94 percent of which are unknown material. Niagara Falls Water Board had 517 identified lines in the July 2025 data; in 2026, it increased to 1,012, but there are still over 17,000 service lines left to be identified. Similarly, Schenectady City Water Works, with 21,130 total service lines, had over 96 percent (or 20,410) still unknown in July 2026. Schenectady City Water Works had 720 identified lines last year and, as of July 2026, the inventory is reporting the same amount, reflecting that this data either has not been updated or there has been no progress in identifying more lines.

Still, other large systems had both identified a significant percentage of their service lines and found a relatively high percentage of those that were lead or GSLRR. Mount Vernon Water Department in Westchester County, for example, identified approximately 53 percent of its service lines, roughly 93 percent of which were lead or GSLRR. Buffalo Water Authority also identified approximately 54 percent of its service lines, of which approximately 82 percent were lead or GSLRR. Similarly, the City of Syracuse's system identified over 58 percent of service lines, with nearly 77 percent lead or GSLRR.

Generally, the large municipal water systems required to provide a public map used similar mapping methodologies, though there was some variation. Municipal water systems, like Suffolk County Water Authority⁶⁸ and Liberty Utilities-New York Merrick,⁶⁹ for example, only included lead, non-lead, and unknown as categories for their lines; they did not include GSLRR. Suffolk County Water Authority reported no GSLRR service lines in their summary of LSL inventory, whereas Liberty Utilities-New York Merrick reported 16 GSLRR service lines, but it is unclear how those were mapped. Municipal water systems also slightly varied in the symbology used and how they specified between public and customer-owned service lines or portions of service lines. These variations, while not unreconcilable, exemplify the broader issues with respect to data reporting that has not been uniform and may make it more difficult to compare systems, identify issues, and target resources.

Over the past year, some systems have made notable progress in identifying service lines. Troy City PWS identified 38.46 percent of all service lines in 2025, and this increased to 56.37 percent in the July 2026 data. Similarly, OCWA also increased its identification rate from 38.12 percent in July 2025 to 50.17 percent in July 2026.

TABLE 1A | Overview of Large Public Water Systems

Name of Water System	Population Served	Mapped	Total Service Lines	Total Identified Service Lines	Total Number of Lead or GSLRR	Percent of Lead or GSLRR Out of Identified
Albany City	98,000	Publicly Available Map	24,680	5,572	2,245	40.29%
Buffalo Water Authority	276,000	Publicly Available Map	76,457	41,085	33,720	82.07%
Elmira Water Board	54,000	Publicly Available Map	19,830	17,117	3,064	17.90%
ECWA Direct	335,000	Publicly Available Map	111,932	99,788	5,718	5.73%
ECWA Amherst	80,228	Publicly Available Map	24,233	22,719	59	0.26%
Hempstead (V)	56,000	Publicly Available Map	9,383	3,920	733	18.70%
Town of Hempstead Water Department	110,000	Publicly Available Map	36,690	6,151	39	0.63%
Jericho WD	58,000	No Map	19,246	19,168	6	0.03%
Latham Water District	85,590	Publicly Available PDF of address	26,058	23,136	40	0.17%
Liberty Utilities New York—Lynbrook	220,000	Publicly Available Map (only identifies non-lead or lead)	77,842	62,603	3,786	6.05%
Liberty Utilities New York—Merrick	135,000	Publicly Available Map (only identifies non-lead or lead)	45,854	45,642	29	0.06%
MCWA	496,753	Publicly Available Map	181,345	174,545	3,805	2.18%
Mount Vernon Water Department	73,893	Publicly Available Map	10,474	5,550	5,156	92.90%
MVWA—Mohawk Valley Water Authority	126,250	Publicly Available Map	44,415	10,832	6,464	59.68%
New York City System	8,271,000	Publicly Available Map	817,567	703,094	120,611	17.15%
Niagara Falls Water Board	50,193	Publicly Available Map	18,182	1,012	369	36.46%
OCWA	350,000	Publicly Available Map	117,156	58,778	4,371	7.44%
Rochester City	214,000	Publicly Available Map	59,422	44,509	14,148	31.79%
Schenectady City Water Works	61,821	Publicly Available Map	21,130	720	50	6.94%
South Huntington Water District	81,760	Publicly Available Map	17,547	17,153	0	0.00%
Suffolk County Water Authority	1,100,000	Publicly Available Map (only identifies non-lead or lead)	396,459	396,405	11	0.00%
Syracuse City	192,000	Publicly Available Map	38,601	22,503	17,287	76.82%
Tonawanda, Town Water Department	72,571	No Map	23,821	12,395	12	0.10%
Troy City PWS	51,401	Publicly Available Map	13,394	7,550	1,949	25.81%
Veolia Water New York	270,000	Publicly Available Map (only identifies non-lead or lead, or unknown)	75,300	55,832	606	1.09%
Veolia Water New York, Inc. RD-1	146,732	Publicly Available Map (only identifies non-lead or lead, or unknown)	32,470	26,180	8,082	30.87%
Veolia Water New York, Inc. RD-2	57,301	Publicly Available Map (only identifies non-lead or lead, or unknown)	12,443	3,425	1,009	29.46%
WA of Western Nassau	120,000	Publicly Available Map	27,817	27,339	4,464	16.33%
Westchester Joint Water Works	59,629	Publicly Available Map	15,097	6,157	670	10.88%
White Plains City	59,559	No Publicly Available Map Online	10,152	7,182	15	0.21%
Yonkers City	211,569	Publicly Available Excel Sheet of Addresses	29,626	2,400	71	2.96%

TABLE 1B | Overview of Large Public Water Systems

Name of Water System	Total Lead Service Lines	Percent Lead Out of the Identified	Number GSLRR	Percent of GSLRR Out of Identified	Non-Lead	Percent Non-Lead Out of Identified
Albany City	2,199	39.47%	46	1	3,327	59.71%
Buffalo Water Authority	33,600	81.78%	120	0	7,365	17.93%
Elmira Water Board	1,033	6.03%	2,031	12	14,053	82.10%
ECWA Direct	783	0.78%	4,935	5	94,070	94.27%
ECWA Amherst	3	0.01%	56	0	22,660	99.74%
Hempstead (V)	119	3.04%	614	16	3,187	81.30%
Town of Hempstead Water Department	20	0.33%	19	0	6,112	99.37%
Jericho WD	2	0.01%	4	0	19,162	99.97%
Latham Water District	6	0.03%	34	0	23,096	99.83%
Liberty Utilities New York—Lynbrook	3,700	5.91%	86	0	58,817	93.95%
Liberty Utilities New York—Merrick	28	0.06%	1	0	45,613	99.94%
MCWA	15	0.01%	3,790	2	170,740	97.82%
Mount Vernon Water Department	5,144	92.68%	12	0	394	7.10%
MVWA—Mohawk Valley Water Authority	6,445	59.50%	19	0	4,368	40.32%
New York City System	117,561	16.72%	3,050	0	582,483	82.85%
Niagara Falls Water Board	222	21.94%	147	15	643	63.54%
OCWA	415	0.71%	3,956	7	54,407	92.56%
Rochester City	12,391	27.84%	1,757	4	30,361	68.21%
Schenectady City Water Works	9	1.25%	41	6	670	93.06%
South Huntington Water District	0	0.00%	0	0	17,153	100.00%
Suffolk County Water Authority	11	0.00%	0	0	396,394	100.00%
Syracuse City	17,239	76.61%	48	0	5,216	23.18%
Tonawanda, Town Water Department	5	0.04%	7	0	12,383	99.90%
Troy City PWS	1,877	24.86%	72	1	5,601	74.19%
Veolia Water New York	561	1.00%	45	0	55,226	98.91%
Veolia Water New York, Inc. RD-1	8,008	30.59%	74	0	18,098	69.13%
Veolia Water New York, Inc. RD-2	922	26.92%	87	3	2,416	70.54%
WA of Western Nassau	4,460	16.31%	4	0	22,875	83.67%
Westchester Joint Water Works	647	10.51%	23	0	5,487	89.12%
White Plains City	2	0.03%	13	0	7,167	99.79%
Yonkers City	65	2.71%	6	0	2,329	97.04%

TABLE 2A | Inventory Data by County

County	Total Population Served	Total Service Lines	Total Identified Service Lines	Percent Identified	Total Count of Lead or GSLRR	Percent Lead or GSLRR Out of Identified
Albany	301,487	76,373	43,418	56.85%	2,622	6.04%
Allegany	31,170	8,320	6,120	73.56%	174	2.84%
Broome	167,670	53,572	25,851	48.25%	1,446	5.59%
Cattaraugus	56,493	18,155	11,177	61.56%	1,037	9.28%
Cayuga	52,725	18,247	11,921	65.33%	377	3.16%
Chautauqua	99,456	32,156	27,975	87.00%	1,058	3.78%
Chemung	83,028	26,712	22,722	85.06%	3,213	14.14%
Chenango	23,006	6,088	4,354	71.52%	193	4.43%
Clinton	64,445	11,500	10,099	87.82%	506	5.01%
Columbia	33,617	7,371	4,497	61.01%	416	9.25%
Cortland	35,681	9,203	8,430	91.60%	164	1.95%
Delaware	22,547	7,043	3,936	55.89%	144	3.66%
Dutchess	224,779	54,868	45,865	83.59%	7,154	15.60%
Erie	976,889	302,044	228,707	75.72%	39,956	17.47%
Essex	34,441	13,905	10,001	71.92%	473	4.73%
Franklin	32,130	7,626	7,162	93.92%	227	3.17%
Fulton	36,457	7,483	6,542	87.42%	1,803	27.56%
Genesee	43,224	18,297	12,355	67.52%	422	3.42%
Greene	30,651	9,088	6,197	68.19%	400	6.45%
Hamilton	4,753	2,396	1,580	65.94%	7	0.44%
Herkimer	42,150	13,045	6,098	46.75%	2,329	38.19%
Jefferson	73,154	17,128	14,525	84.80%	232	1.60%
Lewis	11,517	4,367	3,266	74.79%	101	3.09%
Livingston	53,421	15,342	12,888	84.00%	153	1.19%
Madison	17,743	7,681	6,617	86.15%	759	11.47%
Monroe	747,394	245,916	220,938	89.84%	18,113	8.20%
Montgomery	37,304	9,811	4,775	48.67%	1,052	22.03%
Nassau	1,439,102	414,793	320,345	77.23%	12,904	4.03%
New York City*	8,271,000	817,567	703,094	86.00%	120,611	17.15%
Niagara	223,456	79,456	34,841	43.85%	2,066	5.93%
Oneida	196,308	66,748	20,201	30.26%	7,662	37.93%
Onondaga	610,806	179,897	94,963	52.79%	21,848	23.01%
Ontario	89,980	37,711	30,536	80.97%	1,139	3.73%
Orange	364,746	79,518	56,936	71.60%	2,889	5.07%
Orleans	36,256	15,304	12,171	79.53%	730	6.00%
Oswego	78,076	23,743	15,489	65.24%	3,237	20.90%
Otsego	34,522	9,467	7,110	75.10%	887	12.48%
Putnam	42,076	10,198	6,346	62.23%	24	0.38%
Rensselaer	121,821	33,970	24,358	71.70%	2,284	9.38%
Rockland	305,736	81,641	59,430	72.79%	719	1.21%
Saratoga	181,361	54,943	42,021	76.48%	550	1.31%
Schenectady	115,827	51,231	13,413	26.18%	874	6.52%
Schoharie	13,437	2,845	2,418	84.99%	258	10.67%
Schuyler	7,321	1,546	1,163	75.23%	22	1.89%
Seneca	25,010	8,859	2,514	28.38%	8	0.32%
St. Lawrence	68,683	19,828	11,501	58.00%	162	1.41%
Steuben	55,048	18,510	11,257	60.82%	1,040	9.24%
Suffolk	1,368,604	467,547	465,903	99.65%	16	0.00%
Sullivan	53,079	16,018	12,680	79.16%	10	0.08%
Tioga	33,822	7,614	6,916	90.83%	42	0.61%
Tompkins	98,678	17,246	15,913	92.27%	797	5.01%
Ulster	104,831	27,870	21,651	77.69%	2,798	12.92%
Warren	52,334	20,397	16,008	78.48%	292	1.82%
Washington	33,384	9,292	5,411	58.23%	168	3.10%
Wayne	82,114	32,172	25,004	77.72%	855	3.42%
Westchester	973,266	189,489	114,364	60.35%	16,165	14.13%
Wyoming	24,232	7,783	6,543	84.07%	552	8.44%
Yates	14,103	5,804	5,115	88.13%	404	7.90%

* Includes the Bronx, Kings, New York, Queens, and Richmond.

TABLE 2B | Inventory Data by County

County	Total Lead Service Lines	Percent Lead Out of Identified	Total GSLRR	Percent GSLRR Out of Identified	Total Non-Lead	Percent Non-Lead Out of Identified	Number of Missing Systems
Albany	2,298	5.29%	324	0.75%	40,796	93.96%	1
Allegany	2	0.03%	172	2.81%	5,946	97.16%	0
Broome	67	0.26%	1,379	5.33%	24,405	94.41%	5
Cattaraugus	44	0.39%	993	8.88%	10,140	90.72%	1
Cayuga	7	0.06%	370	3.10%	11,544	96.84%	0
Chautauqua	833	2.98%	225	0.80%	27,032	96.63%	2
Chemung	1,034	4.55%	2,179	9.59%	19,509	85.86%	0
Chenango	11	0.25%	182	4.18%	4,161	95.57%	0
Clinton	10	0.10%	496	4.91%	9,593	94.99%	1
Columbia	328	7.29%	88	1.96%	3,948	87.79%	1
Cortland	0	0.00%	164	1.95%	8,265	98.04%	1
Delaware	109	2.77%	35	0.89%	3,792	96.34%	0
Dutchess	6,708	14.63%	446	0.97%	38,750	84.49%	4
Erie	34,456	15.07%	5,500	2.40%	188,751	82.53%	1
Essex	21	0.21%	452	4.52%	9,528	95.27%	0
Franklin	12	0.17%	215	3.00%	6,935	96.83%	0
Fulton	1,297	19.83%	506	7.73%	4,739	72.44%	1
Genesee	56	0.45%	366	2.96%	11,933	96.58%	0
Greene	363	5.86%	37	0.60%	5,797	93.55%	0
Hamilton	0	0.00%	7	0.44%	1,573	99.56%	0
Herkimer	1,205	19.76%	1,124	18.43%	3,769	61.81%	0
Jefferson	0	0.00%	232	1.60%	14,388	99.06%	12
Lewis	2	0.06%	99	3.03%	3,165	96.91%	0
Livingston	62	0.48%	91	0.71%	12,735	98.81%	0
Madison	452	6.83%	307	4.64%	5,858	88.53%	0
Monroe	12,406	5.62%	5,707	2.58%	202,825	91.80%	0
Montgomery	435	9.11%	617	12.92%	3,723	77.97%	0
Nassau	11,066	3.45%	1,838	0.57%	307,441	95.97%	0
New York City*	117,561	16.72%	3,050	0.43%	582,483	82.85%	0
Niagara	1,617	4.64%	449	1.29%	32,775	94.07%	0
Oneida	7,483	37.04%	179	0.89%	12,539	62.07%	0
Onondaga	17,655	18.59%	4,193	4.42%	73,115	76.99%	0
Ontario	178	0.58%	961	3.15%	29,397	96.27%	0
Orange	2,423	4.26%	466	0.82%	54,047	94.93%	5
Orleans	0	0.00%	730	6.00%	11,270	92.60%	0
Oswego	2,746	17.73%	491	3.17%	12,252	79.10%	0
Otsego	311	4.37%	576	8.10%	6,223	87.52%	0
Putnam	2	0.03%	22	0.35%	6,322	99.62%	2
Rensselaer	1,972	8.10%	312	1.28%	22,074	90.62%	1
Rockland	564	0.95%	155	0.26%	58,711	98.79%	0
Saratoga	100	0.24%	450	1.07%	41,471	98.69%	1
Schenectady	171	1.27%	703	5.24%	12,539	93.48%	0
Schoharie	197	8.15%	61	2.52%	2,160	89.33%	0
Schuyler	3	0.26%	19	1.63%	1,141	98.11%	0
Seneca	1	0.04%	7	0.28%	2,506	99.68%	0
St. Lawrence	14	0.12%	148	1.29%	11,338	98.58%	0
Steuben	10	0.09%	1,030	9.15%	10,217	90.76%	1
Suffolk	11	0.00%	5	0.00%	465,887	100.00%	0
Sullivan	0	0.00%	10	0.08%	12,670	99.92%	6
Tioga	1	0.01%	41	0.59%	6,874	99.39%	1
Tompkins	455	2.86%	342	2.15%	15,116	94.99%	3
Ulster	2,750	12.70%	48	0.22%	18,853	87.08%	0
Warren	15	0.09%	277	1.73%	15,716	98.18%	0
Washington	18	0.33%	150	2.77%	5,243	96.90%	1
Wayne	8	0.03%	847	3.39%	24,149	96.58%	0
Westchester	15,771	13.79%	394	0.34%	98,199	85.87%	1
Wyoming	174	2.66%	378	5.78%	5,991	91.56%	0
Yates	213	4.16%	191	3.73%	4,669	91.28%	0

* Includes the Bronx, Kings, New York, Queens, and Richmond.

Other systems have made little progress in updating inventories. Nine systems reported the same number of identified lines from July 2025 to July 2026 data. These systems range from 3.41 percent identified (Schenectady City Water Works) to 99.99 percent identified (Suffolk County Water Authority). Additionally, five more systems had less than a 1 percent change in the number of identified lines. These ranged from Buffalo Water Authority, which increased from 53.21 percent identified in July 2025 to 53.74 percent identified in July 2026, to Jericho Water District, which decreased slightly from 99.62 percent in July 2025 to 99.59 percent in July 2026.

Systems have also made progress in identifying more lead and GSLRR service lines. ECWA Direct discovered an additional 672 combined lines (from 5,046 in July 2025 to 5,718 in July 2026). OCWA found an additional 476 combined lines to their identified list (from 3,895 in 2025 to 4,371 in July 2026). MCWA added 434 combined lines to their inventory (from 3,371 in July 2025 to 3,805 in July 2026).

During the past year, noticeable declines in counts of lead and GSLRR service lines were also observed, indicating active removal projects or data corrections. Elmira Water Board had significant changes: combined GSLRR and LSL decreased by 25,666 (from 28,730 in July 2025 to 3,064 in July 2026). Troy City PWS also had drastic changes with a decrease of 14,469 combined lines (16,418 in July 2025 to 1,949 in July 2026). Additionally, Rochester City decreased by 2,492 combined lines (16,640 in July 2025 to 14,148 in July 2026). New York City also saw progress with a decrease of 3,586 combined lines (124,197 in July 2025 to 120,611 in July 2026), while Buffalo Water Authority saw a decline of 598 combined lines (34,318 in July 2025 to 33,720 in July 2026).

We have also aggregated individual water system data to create a county-level dataset, including percentages of total identified service lines, LSLs, and GSLRR based on the data available in the inventories currently. The percentage of service lines identified ranges from about 26 percent in Schenectady County to over 99 percent in Suffolk County. Additionally, the percentage of lead and GSLRR service lines out of identified service lines ranges from less than 1 percent in eight counties (Hamilton, Putnam, Seneca, Suffolk, Sullivan, and Tioga counties) to over 38 percent in Herkimer County. We also observed a large range in the number of missing systems between each county. Thirty-six counties and New York City had no missing community or NTNC systems, compared to thirteen counties in July 2025. On the higher end, Jefferson County is missing 12 systems (roughly 26 percent of total county systems), and Sullivan County is missing six systems (roughly 7 percent of total county systems). Identifying the counties that are missing a larger number of systems or have a large amount of unidentified service line data may be useful so that DOH and other stakeholders can target further outreach and technical support.

Analysis and Conclusions

A complete accounting of service lines across all covered water systems in New York is essential, as it is not only required for compliance with federal and state regulations, but necessary for accurately identifying where lead and GSLRR remain, measuring progress towards replacement, and directing financial and technical resources where they are most needed. Our findings underscore that New York State is progressing, but not progressing uniformly, toward complete inventories and LSL replacements. While the quality of New York's service line data has improved over the past year, including fewer missing inventories, challenges remain.

The updated inventory data demonstrates that New York's LSL landscape remains very uneven. Although many water systems have made measurable progress in reducing the number of unknown service lines and improving inventory completeness, progress has varied substantially across communities and, in some systems, little progress has occurred. More than 800,000 service lines across the state remain unknown, limiting the ability to accurately estimate the remaining scope of lead and GSLRR replacements. Additionally, the burden of known lead and GSLRR service lines differs dramatically among communities across the state. While many PWSs report relatively few lead and GSLRR service lines, others face very high concentrations. For example, 82 percent of known service lines in Buffalo Water Authority and 80 percent in the City of Poughkeepsie are identified as lead or GSLRR, compared to the average of approximately 12 percent for all large systems; this shows a disproportionate burden borne by some communities.

This uneven data and implementation may reflect substantial local differences in historical infrastructure, local staffing capacity, and other resources. In our previous discussions with stakeholders—water utilities, local governments, researchers, and advocacy organizations—they highlighted several persistent barriers to developing and submitting complete and accurate inventories. Stakeholders noted staffing and technical capacity constraints, challenges with inventory reporting and data validation, and difficulties identifying unknown service lines and accessing privately owned portions of service lines for both inventory completion and replacement. These challenges may continue to influence the status of inventories.

As the state moves from inventory development toward replacement under the LCRI rule, these disparities suggest that a one-size-fits-all policy is unlikely to be sufficient. Instead, targeted technical assistance, continued data validation, sustained funding, and additional support for communities with large numbers of unknown and confirmed lead and GSLRR service lines will be critical to achieving equitable implementation across the state. New York State is receiving roughly \$115 million annually under the Bipartisan Infrastructure Law for LSL replacement over a five-year period ending in 2026. However, as noted in our 2023 report, “given the more recent EPA estimates of the number of LSLs in the state at 494,007 and assuming the same cost per LSL, the total cost for New York State to conduct full replacements for 100 percent of LSLs would be an estimated \$3.7 billion; \$1 billion more than previously estimated

in 2019.” This means that given the total state and federal funding of approximately \$975 million committed for LSL replacements in New York thus far, roughly \$2.725 billion more may be needed to fully replace all LSLs in New York between now and 2037. In May 2026, the EPA announced \$2.9 billion for state and local efforts to find and replace LSLs, but that funding addresses nationwide needs, not just New York’s.⁷⁰ And, as noted above, in June 2026, Governor Hochul announced a new round of water infrastructure funding, which was provided for in the enacted state budget, with \$127.5 million allocated for the identification and replacement of lead service lines.⁷¹ More recently, in September 2026, the Governor announced an additional \$130 million in Lead Infrastructure Forgiveness and Transformation (LIFT) Grants to communities to identify and replace lead service lines.⁷²

While some portion of the total need may end up being supported through water rate increases, local bonding, and federal funds (including those noted here), relying on these resources to make up the remainder is likely to be insufficient and may result in further disproportionate financial and environmental health burdens to already overburdened communities. Given the uneven and incomplete landscape of information described above, in order to appropriately direct the necessary resources to achieve full replacement of service lines over the next 11 years as required, New York will need to continue to ensure there is adequate investment in and support for systems to accurately complete inventories by November of 2027, so that the required replacements of service lines can be made over the following decade.



ENDNOTES

Endnotes

If you are reading a printed version of this PDF, use this QR code to access the links in these references.



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