Pratt Sustainable Environmental Systems

Public Comment on Proposed Amendments to Article 141 of the New York City Health Code

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As a resident of New York City, I am addressing this letter to express my unqualified support of the proposed amendments to Article 141 of the New York City Health Code, particularly the amendments that have been introduced in subdivisions (g) and (l) of section 141.11, pertaining to the chemical treatment of drinking water for buildings. These amendments are essential to constructing stronger public health and environmental safeguards in one of the world's largest and most advanced city water systems. The purported changes encourage a more open and accountable process of monitoring and reporting building-level water treatment, so all five boroughs' residents can continue to have access to clean, safe, and reliable drinking water.

New York City's water supply supplies drinking water to nearly nine million people, drawing from safeguarded watershed land that was long ago renowned for its quality. However, recent statistics indicate new dangers to the security of our drinking water in the presence of disinfection byproducts, hexavalent chromium, and per- and polyfluoroalkyl substances (PFAS) or "forever chemicals" [1][3]. These toxins have been linked with serious health issues, from cancer to immune system disruption. Trace amounts of these and other toxins were found in multiple neighborhoods throughout the city in a February 2025 study by the Environmental Working Group, raising legitimate concerns about long-term exposure hazards and cumulative health effects [1]. Additionally, increased salinity in some sources of water due to years of application of road salt is beginning to affect the integrity of significant reservoirs, as reported by the Associated Press in March 2025 [2]. Based on these findings, proactive policy revisions such as those currently being proposed are both timely and necessary.

The proposed revision to subdivision (g) will require permittees to maintain and make accessible drinking water sampling and analysis records in a Department-approved format [4]. It is a major improvement on current standards, which lack enforcement potential and data comparability. Standard, Department-formatted reporting will improve the city's ability to monitor compliance and detect problems early on. Standardizing data collection and reporting facilitates increased analytic potency, allowing the Department to

identify trends, make data-driven, targeted interventions, and guide future water policy on a strengthened data-informed basis. Importantly, subjecting building owners and permittees to reporting discipline tightens responsibility. Without obtainable and verifiable data, crimes will go unnoticed or underreported, endangering residents who would otherwise be spared.

Equally essential are the changes to subdivision (l), which would require permittees to provide a report on the initiation or shutdown of a water treatment plant within 24 hours, and additional documentation within five business days upon request [4]. The urgency of such a requirement serves to underscore the Department's capacity to rapidly react to fluctuations that have a bearing on water quality. Advance notice allows health authorities to assess the potential effect of changes to the system and issue guidance as needed. Accelerated reporting fosters transparency and engenders public confidence—a progressively more important consideration as understanding and scrutiny of water safety remain on the rise. The 24-hour timeline also provides a clear regulatory threshold that dispels ambiguity and solidifies enforcement.

Aside from the administrative improvements, these amendments have more environmental and public health implications. Stricter recordkeeping and real-time reporting discourage overuse or misuse of treatment chemicals. Excess chemicals such as chlorine or orthophosphate may find their way into the water supply when treatment systems fail to be properly maintained or monitored, posing a health threat and contaminating the water [7][8]. Through increased monitoring, the proposed regulations indirectly encourage more cautious and environmentally sound uses of chemicals. Adequate and prompt reporting further identifies and solves issues with wastewater discharge and byproduct disposal. Waste from wastewater treatment can discharge pollutants into sewer systems and adjacent environments in the absence of proper treatment [6][8]. Strengthening the reporting system will help improve cooperation between environmental authorities, sanitation authorities, and building managers to ensure such materials are disposed of properly.

The proposed amendments can also be a contribution to a larger cultural transformation in the way we plan urban infrastructure. In a culture of accelerated change where climate-related stressors—rising heat, saltwater intrusion, and changed precipitation patterns—are challenging municipal systems, it is increasingly important that cities embed resilience and sustainability into regulatory regimes [5][9]. The additions to Article 141.11 lay the foundation for building operators to become environmental health stewards, and not just recipients of rules. The clear reporting requirements reinforce the

need for continuous watchfulness and reassert that building-level water systems are a vital node in the city's public health and environmental networks.

To further clearly solidify the purpose and effectiveness of such amendments, I humbly recommend that the Department release anonymized water quality reports from structures subject to such mandates. To release this information to the public would allow residents to better understand their risk of exposure and engage more community interest in environmental health [9]. Transparency in such areas can also motivate building managers to maintain high standards, being aware that residents and advocates can examine performance. Furthermore, the Department could institute compulsory training or certification requirements for permittees who manage or control drinking water treatment plants [6][7]. Requiring all the staff who participate in treatment operations to have current, evidence-based information about best practices in chemical treatment, contamination prevention, and regulatory compliance would help minimize both unintentional errors and reckless acts. Finally, making provisions for periodic review of such amendments would help keep the regulations aligned with technological advancements, new contaminants, and evolving environmental conditions. A review plan, maybe every five years, might incorporate public comment periods and expert recommendations, adding to the democratic and scientific legitimacy of the regulation.

Overall, the suggested Article 141.11 changes to the New York City Health Code are a step in the right direction to protect the health of tens of millions of New Yorkers and maintain the integrity of our water system. By mandating standardized reporting processes and timely system change notification, the changes will enhance building-level transparency, accountability, and environmental stewardship. In doing so, they are responding not only to short-term public health needs but to the broader need for sustainability at a time of environmental uncertainty. I welcome the Department's taking these initiatives and urge their swift and unamended implementation.

Sincerely,

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