

Public Comment on Proposed Amendments to Article 141 – Treatment of Drinking Water
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To Whom It May Concern:

I am writing in support of the proposed amendments to Article 141.11 of the New York City Health Code, which aim to enhance the reporting and oversight of drinking water treatment systems. As a graduate student of Sustainable Environmental Systems at Pratt Institute, a climate advocate, and an environmental justice ally, I believe these updates are critical to ensuring equitable, resilient, and transparent access to clean water in our city.

This issue is not just technical, it is deeply personal.

Before moving to New York, I worked with non-profit organisations in India focused on mental and menstrual health, waste management, river pollution, equitable access to resources for women working in the unorganised sector, and access to safe, clean environmental water in marginalised communities. In many of those contexts, a lack of accountability, data transparency, and public engagement in water governance led to ongoing health crises. Communities had no means to report problems or demand safe water because treatment systems were informal, undocumented, or poorly regulated. I've seen firsthand what happens when water governance fails the most vulnerable—and how environmental burdens are disproportionately carried by women, Indigenous peoples, and low-income families.

That's why I see so much promise in these amendments—they reflect a deep understanding of both scientific responsibility and social equity.

Context & Legal Framework

Access to clean, safe, and equitable drinking water is not just a public health issue; it is a federally enforceable right under the Safe Drinking Water Act (SDWA) of 1974, empowering states and local governments to monitor and enforce water quality standards. The amendments enacted ensure the maintenance of such legal obligations at the city level, preserving the purpose of the Act through improved and timely reporting of information and enhanced traceability of the water treatment process.

Additionally, the proposal aligns with the New York City Watershed Agreement and subsequent Reservoir Protection Programs, which focus on proactive watershed management as an effective environmental solution to filtration. Effective monitoring and timely reporting ensure that our quality unfiltered water supply from the Catskill-Delaware and Croton watersheds continues to meet both federal and state protection levels while maintaining the ecological balance of these critical sources.

Support for Subdivision (g) – Standardised Data Submission

By requiring permittees to submit water sampling and analysis records in a format specified by the Department, the rule addresses long-standing requirements for more accessible and comparable water quality data. This uniform reporting format would:

- 1) Enhance the Department's capacity to detect trends or anomalies in water pollution;
- 2) Minimise communication delay between private operators and public officials; and
- 3) Enhance transparency and enable informed community reactions.

Considering my professional experience and academic background in environmental systems as well as community-based resilience, I can firmly state that such measures are critical to assist in ensuring frontline communities, most of which suffer disproportionately high environmental costs, are not left vulnerable to fragmentation or inconsistency of reporting.

Support for Subdivision (l) – 24-Hour Notification Requirement

Required notification by permittees within 24 hours of startup or shutdown of a water treatment system is an essential revision that reflects best practice in environmental management. Drinking water systems are not passive infrastructure; they are dynamic systems that require constant monitoring and rapid response. This revision:

- 1) Minimises public contact with potential contaminants;
- 2) Facilitates emergency response coordination; and
- 3) Ensures accountability in the face of the rapidly evolving environmental conditions, especially as we face climate-related risks such as flooding, infrastructure stress, and harmful algal blooms.

The further expectation of responding within five business days to departmental requests strengthens regulatory oversight and reinforces a culture of responsiveness and transparency.

Recommendations for Strengthening the Rule Further

1. Public Access to Data:

I recommend that the Department consider making water quality data publicly accessible through a real-time dashboard or annual report. Transparency fosters public trust, and access to environmental data is a foundational tenet of environmental justice.

2. Community Engagement:

It is essential to implement targeted outreach in environmentally vulnerable communities to raise awareness about drinking water rights under the SDWA and the role of these amendments. Collaboration with community-based and environmental justice organizations will ensure these protections reach the people who need them most.

3. Integration with Climate Resilience Planning:

This rule should be integrated into NYC's broader climate resilience goals, including Onenyc 2050, the NYC Environmental Justice for All Report (2024), and other adaptation frameworks. Safe drinking water is not just a health priority—it's a climate resilience and racial equity issue.

Closing

In my experience—both as a student and as someone who has worked in regions where water equity is still a dream—I can confidently say that these amendments move us toward a safer, more just future. What I have seen fail in other parts of the world **doesn't have to fail here**. This is our chance to lead with science, justice, and humanity.

Thank you for your time, consideration, and for advancing this critical step toward environmental justice in New York City.