



Alliance to Prevent Legionnaires' Disease

Alliance to Prevent Legionnaires' Disease, Inc.
1200 G Street NW, Suite 800 | Washington, DC 20005
preventlegionnaires.org | 1-202-434-8757

Alliance to Prevent Legionnaires' Disease Testimony for New York City Council Health Committee Meeting, October 24, 2017

Good morning Chairman Johnson and members of the Health Committee. My name is Daryn Cline, I'm the Director of Technology and Science for the Alliance to Prevent Legionnaires' Disease. I appreciate this opportunity to provide testimony on the proposed Introduction of Bill Number 657-A.

The Alliance to Prevent Legionnaires' disease is a nonprofit public health advocacy group dedicated to reducing the occurrence of Legionnaires' disease. We promote public research, education, best practices for water management, and advocating for comprehensive public water supply strategies to combat this preventable disease.

I understand this legislation aims to provide greater transparency and availability of water tank inspection results. The Alliance supports this effort, however we have two recommendations to take water quality in NYC to a higher level, and to reduce legionnaire's disease cases which at this time are higher than the outbreak year of 2015:

- First, we recommend the city take a system wide approach to addressing the water quality that supplies these tanks.
- Second, the Alliance would like the water tank inspections to include tests for legionella bacteria in addition to the Coliform and E. Coli tests.

We cannot emphasize enough the importance of strategies that address the reality that *Legionella* and other pathogens can exist in our public water supply.



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Some recent examples of legionella in the NYC water supply are the [23rd Precinct](#) in East Harlem, a legionnaires' cluster attributed to their shower facilities and the Parker Towers in Forest Hills, where residents were told by the Health Department not to run hot water in the sink or shower.

To be clear, we do support proper building water management, which includes appropriate testing and treatment of water tanks. However, attempting to control water quality at the end of a very complex distribution system is not only the expensive and time consuming it hasn't proven effective as indicated by the cases of LD to date in NYC. It is simply not practical to expect building owners to effectively control waterborne threats, especially when the quality of the water supply varies due to unanticipated events.

According to the CDC, about 35 percent of all Legionnaires' outbreaks can be attributed to events which take place outside of the building, including disruptions due to construction or water main breaks, and even excessive rain.

New York City continues to experience a record number of cases of Legionnaires' disease. This year, New York City has experienced the largest number of Legionnaires' cases in history – even higher than 2015 which included the devastating outbreak in the South Bronx. Compared to this same time last year, cases are up 85%. But Legionella is not the only concern in NYC to date, NYC has the highest number of cases of Giardia, Crypto and E. Coli since 2014.

The Alliance urges City Council members and other City officials to look beyond narrow approaches that focus only on one component and examine the system as a whole. We support a more comprehensive approach to the prevention of Legionnaires' disease that, in addition to



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proper management of building equipment, equally focuses on steps that can be taken—both short and long term—to reduce *Legionella* health risks originating in the public water supply system. Some steps include:

- Increased investments in our aging water infrastructure to ensure that corroding pipes do not contaminate our water.
- Better guidelines for communication between water utilities and building managers when water disruption events occur. Building owners should know when there is an increased risk for *Legionella* bacteria.
- Monitoring for *Legionella* in the public water supply to help determine the root cause of cases that take place throughout the City including water tank inspections that detect legionella bacteria and other opportunistic pathogens in the bulk water and with the use of swabs.
- Minimum disinfectant residuals to ensure that the water flowing through public pipes is being treated properly before it enters our buildings.

Broad solutions like these will ultimately make building water management more effective, and provide water to our homes that we can consume confidently.

We appreciate each of the Council member's time in listening to this testimony and urge each of you to consider comprehensive solutions to keep our communities safe and ensure that they are receiving the safest and highest water quality possible.