

March 20, 2025



RI Department of Health
Three Capitol Hill
Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

The Honorable David A. Bennett, Chair
House Committee on Environment and Natural Resources
State House
82 Smith St.
Providence, RI 02903

RE: H 5845 – An Act Relating to Waters and Navigation -- Public Drinking Water Supply System Protection

Dear Chair Bennett:

Please accept this letter, with concerns, regarding H 5845, legislation that would require Rhode Island water suppliers to prepare a resilience assessment and a response plan for the risk of natural hazards. This act would take effect upon passage.

RIDOH's regulations under 216-RICR-50-05-1.9.9 require all public water systems to develop emergency response plans. All community and non-community, non-transient systems must also assess and perform a vulnerability assessment for the system. This includes evaluating risks related to potential naturally occurring incidences, as well as those caused by humans in error or intentionally. Currently, emergency response plans are reviewed as part of sanitary surveys and are not required to be sent to RIDOH for security reasons.

H 5845 aligns itself with the America's Water Infrastructure Act (AWIA) Section 2013 which requires all community water systems serving a population of more than 3,301 to develop a risk and resilience assessment and emergency response plan. The federal Environmental Protection Agency (EPA) regulates this AWIA requirement, not RIDOH.

As written, H 5845 appears to have redundancy with other current regulations and a lack of confidentiality of sensitive security information. I thank you for the opportunity to comment on the proposed legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jerome M. Larkin, MD
Director

CC: The Honorable Earl A. Read, III
The Honorable Members of the House Committee on Environment and Natural Resources
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy
