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Date: September 2, 2020

To: Honorable Tom Stevens, Chair, and Honorable Joseph "Chip" Troiano, Vice Chair
Members, House Committee on General, Housing and Military Affairs

RE: Comments on S. 237

As representatives of the state's drinking water and wastewater systems, the Green Mountain Water Environment Association and Vermont Rural Water Association are providing feedback on S. 237. We urge you to amend Section 1 and delete the requirement that a municipal plan include maps of water supply lines, facilities, and service areas and sewage disposal lines, facilities, and service areas.

We advocate for the interests of these public utilities, including 92 municipal wastewater treatment facilities and 216 municipal drinking water systems, the majority of whom are members of our organizations. Those utilities provide clean, safe drinking water and treated wastewater to towns, cities, villages, fire districts, and co-operatives throughout the state. Over many decades, we have helped systems to create and update maps for their lines and facilities. This is an expensive endeavor that is beyond the resources of many smaller systems. The majority of Vermont's municipal water systems serve less than 500 people, meeting the federal definition of a very small public system.

For those systems that do have existing maps, the quality varies greatly, from 100-year-old hand drawn sketches that have never been updated, to modern GIS digital mapping systems that are updated daily. Some small systems may no longer have copies of the maps at all. For example, blueprints may have deteriorated beyond readability or paper maps may have been washed away during flooding. The majority of utility maps that had been submitted to the state and stored at the DEC offices in Waterbury were lost during the flooding caused by Tropical Storm Irene.

In addition, if locations of drinking water supply lines and wastewater lines are known, many utilities have expressed concerns about this information being publicly available. Water and sewer lines and facilities are considered critical infrastructure by the federal government, meaning they are assets that are essential for the functioning of our society. The Cybersecurity and Infrastructure Security Agency (CISA) has stated that the "Water and Wastewater Systems Sector is vulnerable to a variety of attacks, including contamination with deadly agents; physical attacks, such as the release of toxic gaseous chemicals; and cyberattacks." Publishing the locations of utility facilities and lines can lead to terrorism concerns and threaten the security of Vermont's population and economy.

For these reasons, on behalf of Vermont's municipal water and wastewater systems, we urge you to delete the requirement in S. 237, Section 1, requiring a municipal plan include maps of water supply lines, facilities, and service areas and sewage disposal lines, facilities, and service areas.

Thank you,

A handwritten signature in black ink, appearing to read "Liz Royer".

Liz Royer, Executive Director
Vermont Rural Water Association

A handwritten signature in blue ink, appearing to read "Michael Barsotti".

Mike Barsotti, President
Green Mountain Water Environment Association

CC: Peter Walke, Commissioner, Vermont Department of Environmental Conservation
Ron Wild, Committee Assistant, House General, Housing and Military Affairs