



Eastern Shore Association of Municipalities
“A Shore United”

RE: SB0820 Public Water Systems – Supplier Requirements (Water Accountability Act of 2020)

Date: March 5, 2020

Attention: Education, Health, and Environmental Affairs

Honored Senators,

Thank you for your continued service and diligent work on behalf of the citizens of the Great State of Maryland. As the current President of the Eastern Shore Association of Municipalities (ESAM) our organization represents fifty-six municipalities in eight counties on the Eastern Shore of Maryland. Most of our municipalities provide water and sewer services to their residents and businesses within their municipal boundaries and some provide service to those outside of those boundaries. System sizes range from small towns with 100-300 residents to cities of 33,000.

Many of our municipalities are facing serious challenges with regards to the aging infrastructure and the increased costs to not just maintain their systems but to also perform inspections and system upgrades. Staffing for many of municipalities is at a minimum and some even contract their staffing out to private contractors. Municipal budgets are often very constrained and their ability to bond and/or take out loans are often limited, which presents a serious funding issue with the extraordinary growing expense of infrastructure costs.

We recognize that many, if not most of the items within this bill reflect recent EPA requirements that have been put into place, and those are challenging goals for all municipalities. One issue we have a concern with is the requirement that plans must be submitted to the State of Maryland by February 2021, while the EPA requires plans to be submitted by December 2021. We believe and respectfully suggest that this bill should follow the EPA schedule of December 2021.

The in depth look at all valves and hydrants, although a great idea and in theory everyone should be doing it anyway, it is very labor intensive and will take a dedicated team a lot of time to do that amount of work. Old systems are playing catch up and do not have the staffing or the time to identify all the needed replacements. We also have the understanding that the new report requires an in-depth look at our cyber security, financial billing systems, and more detailed what-if scenarios of all hazards. What is required of us from the EPA for this updated Vulnerability Assessment of our system is quite labor intensive. We (City of Salisbury) asked for a quote from an engineering firm to complete it for us and they wanted \$68,000.

Small systems are starting to panic about all of this and a lot of people that put together the original EPA Vulnerability Assessments of 2005 are no longer working so they are looking



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for help. This bill would be very expensive for small municipalities and nearly impossible to obtain without outside help such as financial assistance, grants, and staffing assistance to complete the requirements. Most of the smaller municipalities will likely need to hire consultants to complete the bulk of the work required.

In closing, we are not arguing against the principles of the bill and that water suppliers should be regularly performing these tasks. Our concern is that with this mandate most of our municipalities will struggle to gather the necessary resources such as financial resources and the expertise needed to complete the tasks that are being required. It is our request that first, to have Maryland's requirements follow the EPA schedule for completion. Second, to provide financial assistance through grants (for the study) and grants or low interest loans for infrastructure upgrades as a result of the studies. Third, any staffing assistance that the State of Maryland could provide through the Maryland Department of Planning for smaller municipalities would be a tremendous help. Again, we thank you for your service and we hope that you can consider the concerns that we have for our smaller municipalities.

Sincerely,

Muir W. Boda
Vice-President Salisbury City Council
President Eastern Shore Association of Municipalities