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SB 0871

February 27, 2025

**TO:** Members of the Senate Education, Energy, and the Environment Committee

**FROM:** Nina Themelis, Director of Mayor's Office of Government Relations

**RE:** SB 0871- Department of the Environment - Community Water and Sewerage Systems - Cybersecurity Planning and Assessments

**POSITION: SUPPORT WITH AMENDMENTS**

Chair Feldman, Vice Chair Kagan, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports** Senate Bill (SB) 0871 **with amendments**.

SB 0871 requires the Department of the Environment to coordinate cybersecurity efforts within community water systems and community sewerage systems with the Department of Information Technology and the Maryland Department of Emergency Management. The bill also requires providers to adopt a zero-trust cybersecurity approach for on premise and cloud services and also requires them to engage a third party to conduct an assessment of the community water or sewerage system.

The BCA appreciates the intent behind the proposed legislation mandating community water and sewage systems to adopt a zero-trust cybersecurity posture. While we recognize the importance of strengthening cybersecurity for critical infrastructure, we have concerns about the financial and operational impact of this mandate particularly given the absence of dedicated funding. This would be an expensive and widely laborious effort as implementing a zero-trust cybersecurity posture is an expansive undertaking. This effort will require a re-architecture of wastewater and administration networks and significant prerequisite work before the City could begin the zero-trust architecture effort. It would be a multi-year project requiring extensive resources. Operational modifications would include an increase of staffing to create guidance documents, new standards for the water systems, and training for both IT personnel and water/wastewater system operators. At minimum, the City would need to hire a consultant to support the implementation of zero-trust cybersecurity.

This bill also calls for third-party security assessments. While regular assessments are beneficial, the price for a single evaluation typically ranges between \$30,000 to \$40,000, adding another substantial financial burden. The bill does not include a cadence so we cannot speak to projected costs overtime. Though the mandates called for in the bill are admirable and should be a part of any long-term cybersecurity roadmap, they are not attainable within the allotted timeframe. We strongly support improving cybersecurity within community water systems and community sewerage systems, however, the bill requires sustained financial and operational investment that is not currently available. Compliance with SB 871 would place an additional fiscal burden on the BCA which is currently facing a significant FY2026 budgetary shortfall making it extremely difficult to allocate the necessary resources for additional cybersecurity staff and administration. To responsibly implement the requirements of SB871, the BCA recommends amendments to shift the bill's mandates to best practices to provide the flexibility to implement cybersecurity measures based on risk assessments and available funding. Additionally, State resources or grants could be provided to assist with the costs of compliance.

For these reasons, the BCA respectfully requests a **favorable with amendment** report on SB 0871.