TO: Chairman Price, Ranking Member Rogers, and Chairman Thompson  
FROM: Mike Keegan  
DATE: May 23, 2008  
RE: The Federal Government’s Drinking Water Security Programs

On behalf of the over 26,000 small and rural communities in the National Rural Water Association, we are writing to ask for your assistance in directing the federal government’s agencies with responsibility for implementing drinking water and wastewater security programs to adopt initiatives that are most effective, beneficial and successful in small and rural communities. Small communities make up over 90% of the country’s approximately 50,000 community water supplies and have the least ability to pay for additional federal initiatives. As you know, small communities with limited economies of scale can least afford and deal with new complex federal regulations. Specifically, we urge you to prioritize federal resources in the Fiscal Year 2009 Department of Homeland Security (DHS) appropriations bill to the initiatives that result in the most protection of the country’s drinking water supplies and sanitary sewage systems.

For the past five years we have urged the two main federal water security agencies (DHS and the Environmental Protection Agency) to adopt initiatives that will achieve more results and protection. Attached are comments to agencies on the following topics:

- **Implementation of the Risk Analysis Method for Critical Asset Protection plan (RAMCAP) in a manner workable and cost-effective in small communities**  
  March 4, 2008 letter to Ranking Member Inhofe, Chairman Thompson, Chairman Price and Chairman Dingell [page 3]

- **Assisting small and rural communities with security enhancements to protect chemical supplies (so called Chemical Security Plans)**  
  January 28, 2008 letter to Chairman Thompson [page 4-6]

- **Providing disaster relief assistance to water suppliers**  
  September 29, 2005 Testimony before Environment and Hazardous Material Subcommittee [page 15-20]

- **Implementing the National Incident Management System in small water and wastewater supplies**  
  August 3, 2007 letter to Department of Homeland Security [page 12]

- **Implementing a security communications network and effectively targeting federal resources in small water and wastewater supplies**  
  August 3, 2007 letter to Department of Homeland Security [page 13]
We continue to urge DHS and EPA to implement their security initiatives in a manner most effective and cost-effective in small communities. If the federal agencies were directed to implement these security initiatives, we could move from agency deliberations and study, to direct implementation and quantifiable results. We had asked DHS and EPA to work with rural water on developing security initiatives – yet the agencies continue to develop their own tools that are rarely used in small communities. For example, we have attached a letter from a small town [page 21] that shows that without rural water vulnerability assessment (VA) model and assistance, they would have contracted out their VA that can be upwards of $12,000 to complete by consultants. On the other hand, rural water technicians walked most small towns through completion of a VA free of charge. EPA found that over 90% of small communities utilized the rural water approach. However, DHS and EPA have recently chosen only to provide funding for their funded VA tools that was not used by most communities.

In a recent survey (the largest of its kind), the entire water sector polled 1,175 water and wastewater supplies, in 48 states, on key security questions. The results of this survey have been presented to DHS and EPA, and include the following findings:

Who makes you aware of security concerns?
1. State - 22%
2. Rural Water Training - 42%
3. Rural Water On-site Assistance - 21%
4. EPA - 5%
5. DHS - 7%

Who has provided the most useful security information?
1. State - 15%
2. Rural Water - 71%
3. EPA - 5%
4. Consultants - 6%
   • 9% of utilities have received grants from EPA or DHS to increase security.
   • 5% have received assistance from EPA to enhance security at their facility
   • 6% have received assistance from DHS to enhance security at their facility

We appreciate your continued help and support in making federal security initiatives (including those that are unfunded mandates) as reasonable, economical, and simple as possible. We believe that directing DHS to prioritize funding resources for the initiatives outlined in the attached comments to the agencies will result in the most protection of the country’s critical resources and infrastructure.

Thank you and please contact us with any questions.