

WATER SECTOR COORDINATING COUNCIL



May 4, 2012

William Flynn
Acting Assistant Secretary
Infrastructure Protection
U.S. Department of Homeland Security

Pamela Barr
Acting Director
Office of Ground Water & Drinking Water
U.S. Environmental Protection Agency

Dear Acting Assistant Secretary Flynn & Acting Director Barr:

For nearly five years now, the Water Sector Coordinating Council (WSCC), the U.S. Department of Homeland Security (DHS) and the U.S. Environmental Protection Agency (EPA) have been engaged in an ongoing effort to update and upgrade the water sector's most commonly used vulnerability assessment (VA) tools; VSAT, SEMS and ARAM-W. While the goals and objectives of this effort have evolved over time, the imperative continues to be to successfully leverage the NIPP's public-private partnership model in order to accomplish the following:

1. Upgrade vulnerability assessment tools in a manner that provides usability and value to drinking water and wastewater systems of all sizes (including small ones that may not have the staffing/expertise of larger utilities with greater resources).
2. Have, as an end product, tools that conform to the industry standard known as J100.
3. Ensure that the sector's federal partners provide, as a follow up to tool development, an appropriate level of technical support and training for owner/operators.

Greater detail regarding each of these aims is outlined in the Council's most recent correspondence to the Department and the Agency on January 26, 2012.

The Council co-chaired a CIPAC workgroup with EPA in August 2011 that developed a report which outlined the specific changes necessary to support each tools conformity with the J100

Standard. We believe that completion of this report fulfills the Council's obligation to define a blueprint and path forward for the federal partners to complete work on the VA tools.

However, the Council has since been informed by DHS and EPA that due to budgetary constraints, upgrading the tools may no longer be possible. Our understanding is that EPA and DHS are still committed to ensuring that at least one comprehensive tool will be available to water systems. In the interim, the private sector has moved forward to provide a free open source tool that conforms with the J100 Standard, and it is the Council's impression that EPA and DHS may no longer implement the recommendations of the CIPAC report.

The Council is pleased that the private sector has developed an innovative VA tool that supports the water sector's needs. However, we are disappointed to think that after five years of ongoing engagement with DHS and EPA a federally supported tool may not be brought to bear.


It is the hope of this Council that our federal partners will use the blueprint developed by the CIPAC workgroup to complete the necessary upgrades of the examined VA tools. If EPA and DHS defer to the open source solution, the Council strongly encourages our federal partners to apply their resources to supporting utility owner/operators with technical assistance and training to maximize the effectiveness in which they can use the open source tool.

We recognize and appreciate the challenging realities associated with limited budgets, but those factors should not overshadow the overall security of our sector.

The work done on this issue over the past five years has been challenging and rewarding; ideally it will yield additional security resources for the nation's water service providers.

The Council looks forward with great anticipation to learning more about your respective plans to proceed on this important matter as defined in Goal 2 of the Water Sector Specific Plan.

Sincerely,



William L. Komianos, CIH, CSP
Chair, Water Sector Coordinating Council
Sr. Director, Operational Risk Management
American Water

cc: David Travers, EPA, Director, Water Security Division
Debbie Newberry, EPA Associate Director, Water Security Division
Craig Conklin, DHS, Director, Sector Outreach & Programs
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