



William C. Velasquez Institute



LEAGUE of UNITED LATIN
AMERICAN CITIZENS

Our organizations are two of the oldest Latino civil rights organizations in the United States. For us water, whether for business, agriculture or daily use is life. We therefore applaud the State Water Resources Control Board's (State Water Board) Affordable, Safe Drinking Water Initiative and respectfully submit the following comments.

Implementing AB 401 (Dodd). Californians have a right to safe water. This premise is rooted in both human rights and public welfare and was codified by California in 2012. State policy, AB 685 (2012), ensures universal access to water by declaring "every human being has the right to safe, clean, affordable, and accessible water..." Indeed, when water costs make water unaffordable it poses both health and safety issues for impacted communities.

We are also mindful that the State Water Board is in the process of developing a plan for funding and implementing a statewide Low-Income Water Rate Assistance Program. Our communities need and support the development and funding of the plan.

Water in California is becoming more expensive. The state's growing population (50M by 2049), climate change and the drought, aging water infrastructure, and rising administrative Water District costs are all contributing to higher costs. The result, unfortunately, is that more low-income households, including Latino households, now have unaffordable drinking water.

While a number of water service providers in California currently provide assistance to low-income customers, there is no uniformity or consistency in the programs with assistance varying from 50% to 15% discounts¹. There should be uniform state-wide standards for assistance to low-income customers.

Community Challenges. Understanding community/customer challenges is a starting point in addressing this issue. For example, in the Central Valley residents purchase bottled water for drinking because the water is not safe to drink. In places like Porterville this has been exacerbated by climate change and the drought with wells drying up. With the State Water Board estimating that some 400 disadvantaged communities are receiving water from public systems that do not meet drinking water standards the first step in assessing safe drinking water for disadvantaged communities is to ensure both adequate and safe supplies of water for those communities.

Creating proactive programs to ensure low-income community's access to Proposition 1 and the Drinking Water State Revolving Fund assistance monies is essential. In addition, programs need to be established to assist low-income water districts in treating for arsenic, uranium and

¹ CalWater 50% discount up to \$12; Sacramento up to \$100; Napa \$4.75 bimonthly; San Francisco 15%

fluoride; treating for nitrate pollution in communities relying on ground water; and providing subsidies to communities, like Porterville, to develop new deeper wells and import drinking water supplies.

In the event there are no funding sources available to provide funding for long-term operations and maintenance costs the State Water Board should provide technical assistance to low-income Water Districts regarding developing new and novel funding approaches².

Streamline Eligibility Requirements. Energy affordability programs have been in existence for years in California. Ensuring that low-income customers are informed of water related assistance programs in Spanish and English (and other commonly used languages) is essential to ensuring safe affordable drinking water.

Establishing state-wide consistent guidelines for these programs is also essential. For example, the Golden State Water Company has a low-income rate assistance program based on the same eligibility requirements as the California Alternate Rates for Energy (CARE) program³; allowing customers to enroll in their water program by simply submitting a copy of a current utility bill showing eligibility for CARE. Establishing this kind of uniform program across the state would aid both those administering the programs as well as the end user customers.

Conservation. With the drought, conservation needs to become a way of life. Sending out, in Spanish and English (and other appropriate languages) information educating on the continued need to conserve water should become routine. For low-income customers, offering either waivers of the fixed portion of their water bill or a percentage discount based on the amount of conservation should become routine.

Budget Billing. Budget billing removes uncertainty by averaging the bill over the year, reducing fluctuations in summer peaks. While this does not reduce the total cost of the water over a year, it does improve affordability in summer months when water use typically increases. In addition, full due process protections for terminating water service should become policy for low-income customers⁴.

Desalination. Water districts in drought prone and populace Southern California are relying on (San Diego) and planning to incorporate locally produced desalinated water into their portfolios⁵.

It should therefore be considered in the State Water Board's assessment of how to provide affordable drinking water to low-income families.

² This could include sharing water services or consolidating water districts. Assistance in development of asset management and energy plans along with Board trainings. Assistance in researching federal grants and private charity programs for affordable water programs.

³ Qualification is based on total income of everyone living in the home or participating in qualifying public assistance programs.

⁴ Required notice of customer opportunities to enter a budget billing or deferred payment arrangement.

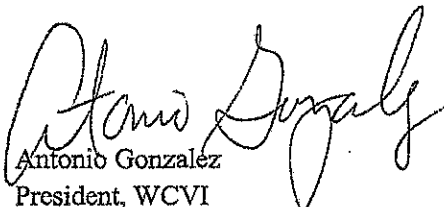
⁵ Dana Point, Huntington Beach, El Segundo, Avalon, Oxnard, Santa Barbara, San Luis Obispo.

As pointed out above, the cost of water to customers in California is inevitably rising. AB 401(Dodd) projects water bills, across the state necessarily rising (or have risen) from between \$4-\$13 (with the PUC granting increase of between 10%-24%). Given the reality of: these cost increases, drought still gripping Southern California, the South's dependence on imported water, projected future population growth and water districts throughout Southern California using and considering seawater desalination to produce drinking water, we believe the State Water Board has to consider this new local sources in its analysis and policies regarding Affordable, Safe Drinking Water for low-income water users.

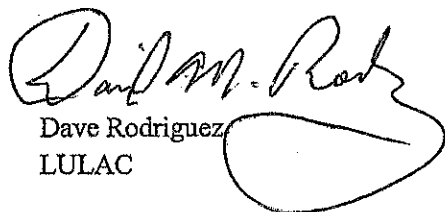
The Claude "Bud" Lewis Desalination Plant is a baseline in public/private ratepayer costs for the state⁶. The facility, the largest in the western hemisphere, produces 50 million gallons a day (50MGD) of drought proof water at a cost of half a penny per gallon with increases to ratepayers of an additional \$4.75 a billing; a cost at the low end of the cost increases referenced in AB 401. Likewise, the proposed 50 MGD plant for Huntington Beach projects an additional cost to customers of between \$3 and \$5 a billing.

Just as the costs of water are inevitably rising, state planning and policy inevitably has to begin to factor in and consider this new, local, sustainable source of water in assessing affordable safe drinking water for low-income customers.

Respectfully submitted,



Antonio Gonzalez
President, WCVI



Dave Rodriguez
LULAC

⁶ A 30-year Water Purchase Agreement is in place between the San Diego County Water Authority and Poseidon Water for the entire output of the plant. Per that Agreement costs to ratepayers have been limited to \$4.75 a billing period.

