



# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

Public Comment  
Low-Income Water Rate Assistance Program  
Deadline: 2/1/19 by 12 noon

GENERAL MANAGER  
Jim Barrett

ASSISTANT GENERAL MANAGER  
Robert Cheng

January 30, 2019

Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



Dear Ms. Townsend:

Subject: Coachella Valley Water District Comments - Options for Implementation  
of a Statewide Low-Income Water Rate Assistance Program

I am pleased to present the following comments to the State Water Resources Control Board (SWRCB) on the report "Options for Implementation of a Statewide Low-Income Water Rate Assistance Program," (Report) issued January 3, 2019.

The Coachella Valley Water District (CVWD) serves approximately 110,000 homes and businesses on its domestic water system. CVWD's retail cost per unit of water, including the monthly service charge, is 23.76, which is significantly lower than the average \$53.81 (in 2015) quoted in the Report on page 4. The Report states 46% of state water suppliers offer a low-income water rate assistance program (W-LIRA). CVWD is one such agency.

CVWD's W-LIRA, Help2Others, is administered by the United Way in the Desert. Recently, the maximum dollar amount a customer may receive was raised from \$50 per year to \$100 per year. For a customer to be eligible to receive assistance, all household members' income, from an eligible source, must be combined to calculate a gross annual household income. Qualifying income must be 200% below the federal poverty guidelines. All information pertaining to the Help2Others program can be found at <http://cvwd.org/367/Customer-Assistance-Program>.

CVWD fully supports the state's effort to establish a W-LIRA program. However, it recommends and requests an exemption or waiver for functionally equivalent assistance programs already in place. CVWD would be happy to make necessary amendments to its program and work with The United Way to continue to operate the program following adoption of regulations by SWRCB. It would be unfortunate for CVWD to take on additional administrative tasks, which would per se raise the cost of doing business, in order to administer a new program and replace an existing program for which CVWD bears minimal administrative costs.

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CVWD strongly opposes a tax on bottled water as a means to fund the proposed W-LIRA program. Such a tax would penalize the population the SWRCB and the state legislature aims to assist. In disadvantaged communities where community water systems are likely to have water quality issues, residents must purchase bottled water for cooking and drinking. A tax on the product these Californians rely on for safe drinking water is contrary to the purpose of the W-LIRA program and should be eliminated from consideration.

CVWD looks forward to continuing to work with the state on finding solutions to fulfilling the state Constitutional acknowledgement that access to safe affordable drinking water is a basic human right. Please contact me at (760) 398-2651 x3564 or [kjohnson@cvwd.org](mailto:kjohnson@cvwd.org) with any questions about the comments above or about CVWD's Help2Others program.

Sincerely,



Kristen Johnson, J.D.  
Government Affairs Specialist

cc: Assemblymember Eduardo Garcia, chair, Committee on Water, Parks and Wildlife