



# CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

FIGHTING FOR JUSTICE, CHANGING LIVES

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Delano	Santa Barbara
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Oxnard	

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State Water Resources Control Board

Attn: Jeanine Townsend

1001 I street, 24<sup>th</sup> Floor

Sacramento, CA 95814

Sent via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

## **RE: Draft Report on Options for Implementation of a Statewide Low-Income Water Rate Assistance Program**

California Rural Legal Assistance, Inc. (CRLA) is a statewide non-profit legal assistance organization focused on serving low-income and underserved populations in California. With eighteen offices located across the state, CRLA serves over 50,000 low-income individuals a year. The Community Equity Initiative is a program of CRLA that specifically aims to address the needs of communities in unincorporated areas which tend to be rural and low-income with limited access to services such as clean water, medical facilities, and grocery stores.

In our clients we see the great need for water rate assistance and provide these comments on the draft report on Options for Implementation of a Statewide Low-Income Water Rate Assistance Program in an effort to ensure the program is as robust as possible. Below are comments on the revenue collection options and the options for benefit distribution.

### **I. Revenue Collection Options**

We are concerned about using a bottled water tax to fund the program. As the report notes, a bottled water tax could impact low-income households that purchase bottled water as a necessity to avoid using contaminated water, or perceived contaminated water. Smaller, rural, low-income communities are more likely to pay higher water rates and to rely on contaminated water. They purchase bottled water to protect themselves and their families. Adding a tax on one of the few options for clean water low-income communities with contaminated water have will contradict the purpose of lessening the financial burden for water on low-income households.

### **II. Options for Benefit Distribution**

After reviewing the various options for benefit distribution, we are encouraged by the option to use electric or gas bills due to the greater reach already existing energy utility





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programs currently have and the greater percentage of households who receive a direct bill from an energy provider. There are also concerns with using the other options.

For CalFresh or a new EBT program we are concerned with the low enrollment rates. We are concerned that recent political developments will lower participation in these programs. Of note is the proposed modification to the public charge policy. We are already seeing eligible low-income households disenroll from programs and many other households are fearful of remaining on the programs.

Benefit distribution via a tax credit would not alleviate the monthly struggle of low-income households who struggle to make ends meet each month.

Benefit distribution via water bills is also concerning to us. We work with a number of small communities with small water systems and have seen the need for additional administrative support for small water systems. We are concerned with their ability to implement such a program.

We look forward to working with the State Water Resources Control Board to ensure a water rate assistance program is effective in alleviating the water cost burden on low-income residents, particularly rural, low-income residents. Thank you for your time.

Respectfully,

Marisol F. Aguilar  
CEI Program Director  
California Rural Legal Assistance, Inc.