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January 30, 2019

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA, 95814  
Sent Via Email



Subject: Comment Letter- Options for Implementation of a Statewide Low-Income Water Rate Assistance Program”

Dear Honorable Chair Marcus and Members of the Board:

The Amador Water Agency is the largest treated water purveyor in Amador County and serves several disadvantaged communities which makes up a large portion of our customer base. The Amador Water Agency would like to offer the following comments on the Draft Options for Implementation of a Statewide Low-Income Water Rate Assistance Program:

**Funding Source**

We believe use of the General Fund is an appropriate funding source. We are firmly opposed to any water tax. It would be inefficient and expensive for the over 3,000 public water systems to become tax collectors. Proposition 218 is a barrier for public water agencies. The draft report did not adequately address this concern. The possible creation of a trust using State surplus funds should be evaluated.

**Benefit Distribution and Administration of the program**

CalFresh should be utilized for the benefit distribution. We are opposed to public water agencies becoming the program administrators. Public water systems do not have income data for eligibility verification or fraud. The administrative costs for public water agency administration would be very expensive requiring additional staff, new procedures and policies. CalFresh is already organized with the ability to confirm eligibility, and implement electronic benefit transfer (EBT) cards.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Mancebo".

Gene Mancebo, General Manager