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To: Yang.Mary@Waterboards
Subject: Comment Letter – LIRA Program Scenarios
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The LIRA program for water in California should not be structured to support excessive water use. Many urban water districts currently impose a fixed charge for water use combined with a volume charge. In many districts well-to-do homeowners use high volumes of water part of the year and lower volumes for the balance of the year, while low income households are likely to use lower volumes of water all year round. The result of the fixed charge is that low income households effectively subsidize water for the gardens of the well to do.

State supported LIRA programs should encourage or require the exclusion of fixed charges for water service, wastewater treatment and sewer service. Charges should be only by volume, ideally in tiers sized to the number of residents in the home, for water service and for corresponding estimated wastewater treatment and sewage. A wet weather charge may be fixed for wastewater and sewage estimated based on hard surfaces of the property that drain into the street and the street surface fronting the property. Wet weather charges might be collected on a property tax bill or the water bill.

Such an approach would avoid the state or water agencies cross-subsidizing excessive water use, particularly in times of drought. In addition LIRA funding would go farther to cover the appropriate water bills of low income families treating water use carefully. LIRA funds might also be directed to installation of smart water meters and local efforts to identify and repair water leaks in or around low income residences.

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