

#### Public Comment Period for the Lifeline Pilot Plan

The Detroit Water and Sewerage Department (DWSD) sought community feedback on the new income-based water affordability program, the Lifeline Pilot Plan. The feedback period began on June 28, 2022 immediately following the Board of Water Commissioners meeting and ended on September 30, 2022. The public had an opportunity to share feedback online at <a href="detroitmi.gov/water">detroitmi.gov/water</a>, during Board of Water Commissioners meetings, and at 10 Lifeline Plan Enrollment Fairs, nine in-person and one virtual. For the purposes of sharing this publicly, exact duplicate comments were removed from the following list.

#### **General Feedback**

- It's a wonderful idea.
- This sounds like a good idea. I sure can use the help. Thanks.
- This would be great for low-income families like myself. I have three children and I'm currently working part-time.
- I think it's amazing.
- Great idea to help low-income homes.
- It's a great program.
- Thank you. This is much need and appreciated.
- I think it a good idea but it needs out more to the people so people can apply.
- I think it's a good plan especially for families facing hardships and seniors.
- This would really help residents that are really deciding on if they should eat or pay for their bills which are already beyond their means of leaving.
- I believe this plan would be great for those on a fixed income like myself. The bill will be same every month and at a fixed cost that is affordable.
- I think this would be a wonderful program for seniors , disability, working people whomever meets the guidelines.
- I think that's a perfect plan it would help a lot of people out.
- This is a very good thing to help people with their utility bill.
- Thank You for helping us with the rising cost of our Water bill. I plan to take advantage of the clinics and information provided.
- I agree 100% with an income-based water affordability plan. Having also lived in Washington, DC and Maryland and having the same number of people in my household (1), I find Detroit's water and sewage fees to be excessively high in comparison.
- For those of us on a very limited budget, those extra \$15 or \$23 per month off our water bill makes a difference (my water bill as a WRAP enrollee is typically \$31 to \$41 per month).
- I think that this would be great in helping working families get some relief. There is usually no assistance for single individual who works/nor working families. This is a great Idea and I jumped on it. I filled out my application already a few months ago, just waiting to hear from someone.
- The Lifeline Plan seems like a good idea. I can definitely use a lower rate on my water and sewerage bill every month.



- This is a great program because the cost of water is very high for someone like myself, so I truly appreciate this opportunity.
- I am writing to both thank you for your work in carrying for the community and to share my thoughts on our need to keep water accessible and affordable to all Detroiters.
- I am glad that water affordability is being discussed and I hope it STAYS an issue of importance. I believe that clean, safe, and affordable water is a necessity to the families of Detroit. This "Lifeline" is a start, but the conversation can't end with this vote.
- I thank you and trust that you are working with concern for the families of our city. Quality water bring quality life."

#### **Eligibility Questions**

- Am I eligible if my water meter is not connected to my water entry line. I have received notices to connect the water meter, and plan to but I am currently not in a position to pay a plumber to do what he needs to do in the house. Is there any way to seek assistance with this challenge?
- What is the income for 135% of the poverty level?
- Will seniors be automatically enrolled?
- Will there be any restrictions as far as enrolling this program do you have to live in your home for so many years? Do you have to be the owner? What are the restrictions.
- What is the senior age qualification? Do the plumbing repairs include internal parts of the home like the bathroom and kitchen?
- Can refugees apply if they have a Social Security Number and water bill? Can refugees apply if landlords aren't letting them put their name on the bill?
- Currently on the WRAP program. My bill jumped from \$40 to \$100 this month. DWSD can't find out why. How do we know why the water bill increases if we're on this program?
- What is the income limit for 1 person?

#### **Comments Where Residents/Stakeholders Think Program Falls Short**

- Where is the assistance for residents who pay their bills but still struggle and don't qualify for the Lifeline Plan? DWSD has the 10/30/50 Payment Plan
- This is not an income-based water affordability plan. This is a tiered water system that will unfairly punish folks with older homes and fixtures and people with more than three individuals living in a home. I live in a home with one other adult and a toddler, we have all new fixtures and are conservationists and we routinely use over 4,500 gallons per month.
- Detroiters have been hit hard by the pandemic and before that the housing crisis, forcing many to leave their homes and move in with friends and family. This plan fails to take that into consideration and will unduly inflate water rates for folks that are already struggling and that can't afford to update fixtures in their homes.
- Detroit has a true income-based water affordability plan. It was passed by city council in 2005. Stop trying to reinvent the wheel and do what works. Look at the success of Baltimore and Philly, this can be done. Detroiters need real income-based water affordability now.



Detroiters.

### **Community Feedback**

Also, the suburbs need to pay their fair share of the sewage costs for the region. We must address the 83/17 split. It's time to go to court and get justice for Detroiters. This would result in a minimal increase in water rates for the 86 communities that use the system and a noticeable decrease in the water bills for Detroiters. Look at the root causes and address them. You are not listening to the advocates that have been screaming about what you need to do for nearly two decades (so please stop saying that you are), when will you actually listen?

- What is the reasoning behind the 4,500 gallons/month? What happens if you have 5 people in the house and usage is always above the threshold? People need more water to stay clean and in good health.
- Concerned the [water usage] threshold is too low.
- I also have concerns and complaints about the efficiency of Wayne Metro's processing of the new income-based water affordability plan enrollment after its launch on July 1, 2022 announced by the Mayor on June 28, 2022 in his press conference.
- There are three specific areas where the current plan falls short:
   6 CCF (or 748 gallons) of water per month is not enough to cover all households, particularly those who have more than 3 people in the home.
   DWSD must identify a permanent funding solution to maintain water affordability for all
  - DWSD must outline the process for continued community engagement, communication, and program data review in full transparency.
  - Implement these edits to ensure that residents are able to permanently bridge the affordability gap, not just applying a temporary band-aid to a systemic issue!
- Water is now clearly THE issue for public management across the globe for the foreseeable future. Detroit's Lifeline program begins to step in the right direction, but there is need to respond proactively to the needs that are already clearly emergent: adapting the plan more realistically for households larger than 3 (748 gallons is insufficient for such); financing the system requires innovation--bills have simply grow excessive; and there needs to be a permanent transparent process to hear, learn from and remain accountable to the communities and residents affected--not just their "representatives," but their own voices and concerns.
- I am disturbed that many Detroiters may find themselves facing water scarcity due to concerns
  around affordability when we are surrounded by so many fresh water sources. I urge DWSD to
  find a more sustainable and permanent funding plan to maintain water affordability for all
  Detroiters. If all Detroiters have access to clean and safe water, it can only serve to benefit our
  community as a whole.
- Please considering implementing a permanent solution to water insecurity to make clean, safe water affordable for all.
- Please create and enact a long-term water safety and usage plan for all Detroiters.
- Affordability is not the same as assistance, assistance is a band-aid solution, and true water affordability is not related to water usage.
- Alafia Foundation of Hope International stands in solidarity with We the People Detroit in expressing the following concerns regarding the current or proposed DWSD Lifeline Plan:



- 6 CCF (or 748 gallons) of water per month is not enough to cover all households, particularly those who have more than 3 people in the home;
- DWSD must identify a permanent funding solution to maintain water affordability for all Detroiters;
- DWSD must outline the process for continued community engagement, communication, and program data review in full transparency.
- We acknowledge the efforts of the DWSD in addressing the water affordability needs of all Detroiters, however, we request that you consider the concerns outlined above which we feel will assist DWSD in improving the Lifeline Plan.
- I would like clean and safe water, and an affordability plan that is based on income that considers those without jobs, the poor, and those on fixed incomes. We should be notified of decision-making meetings to discuss any changes to water prices and services, instead of being sent information at the last minute after decisions have been made and implemented. I feel the suburbs and other cities should pay more to get water than Detroit residents. We should not be paying higher water prices while suburbs and other cities get discounted rates. I was not informed of how or why a contractor was chosen and given the contract to service water pipes in the front and back of homes with an extra fee for Detroit residents to pay when many are already struggling to pay water and other bills.
- This plan does not go far enough. More needs to be done to ensure access like increasing the
  monthly water usage allowance for households and finding a permanent funding solution for
  water affordability in the city.
- I think that 6 CCF of water per month is not enough to cover all households. Those with 3 or more people in the home should have a larger allotment.
- Not only do I think that DWSD needs to find a permanent funding solution to water affordability, but a workable outline created to ensure full transparency of how the program works, where funding comes from and how it is spent, all to ensure clear communication and engagement with the community is also needed.
- The City of Detroit has made several attempts at a water affordability plan. How do we know this plan will work? The DWRAP and 10/30/50 programs both failed to include proper input by community members and people most impacted by water shutoffs. Detroiters still faced a water crisis due to enrollment limitations and unreasonable time restrictions. The 10/30/50 plan was punitive and did not support residents that struggled with paying their water bill. Both plans created without the voice and vision of the community and advocates failed resulting in water shutoffs.
- DWRAP and the 10/30/50 plans prove that water plans created without community input do not work! The process of drafting the Lifeline Plan was opaque and did not appropriately engage the community. DWSD did not make the full plan available until 22 days after it was approved by the Board of Water Commission. Where does a community go when officials undercut the democratic process as DSWD has done? Silencing the voices of the people is glaringly this body's continuation of acts of oppression and repression that is ultimately designed to curtail civic engagement -- supposedly the foundation of democracy. What now? More of the same "power over" approach to governance? We see you and will continue to be diligent in raising the alarm about DWSD's disregard for transparency in decision making. Let's see what details



you will release regarding DWSD's appointment of the Ombudsman to oversee the plan that is supposedly a lifeline for people. Will shutoffs end? It appears that this pilot is tantamount to another disinformation ploy. DSWD has not demonstrated knowledge of where it is going. It is way past time to demonstrate good governance!

- This is NOT a Water Affordability it is a water rationing plan. The water usage levels in the plan are based on at least two flawed assumptions:
  - 1) 3 people per household. It should be obvious that this is too low, particularly for those households having problems paying their bills.
  - 2) The water usage per person level is very low. I believe it is almost half of that the EPA and UN figures state.

There is also the issue that there have been no public feedback sessions scheduled as promised. You need to go back to the drawing board. The amount of water should not be rationed or limited and is far, far lower than average use 12,000 gallons per month. The current limit is immoral and impractical and cancels what few benefits this plan offers. Income based water bills mean income-based water bills not what authorities estimate people can pay. This lesson should have been learned with the "payment plan" method that had people falling off because they couldn't afford the plan and then re-enrolling repeat the failure. Make the plan income based without an arbitrary floor and without rationing water. Make it practical, moral and humane rather than rely on the shame folks feel for not being able to afford the prices handed to them.

Everyone deserves affordable water. The lack of affordable water places the entire community at risk of health issues and diseases.

Detroiters have worked for many years building family and community, oftentimes when some left or refused to support the city. It's left seniors and working-class families with high costs and devalued homes. We Detroiters deserve to have lowered costs for this basic human need—WATER!

#### **Recommended Changes**

- While I think this plan is a good start, I believe the enrollment and forgiveness period should be
  extended to at least August 1st, 2023. Additionally, DWSD should work with the Detroit City
  Council to pass a formal ordinance to codify a water affordability plan, such as the graduated
  ordinance that exists in Philadelphia.
- Homeowners who have been approved for the HOPE plan should automatically be enrolled in the Lifeline Water program. That ensures that those who are eligible are enrolled in the plan to prevent water shut offs.
- There should be a tutorial on how to read a water bill. No one knows the actual water usage in their home. The water bill is difficult to comprehend water usage. There should be easy access for residents to get a printout of water usage history.
- I would like to make plan for every monthly until paid off zero.
- The 2nd tier of the rate structure that is triggered when a customer exceeds 4,500 gallons used
  will likely present a challenge for larger families and even smaller ones that are not familiar with
  conservation measures or leak detection strategies. It may be useful to have a pot of money or



set aside fund (from any variety of sources including the WRAP, and funds collected from the .50 paid by customers) to assist these families during some interim period of time e.g. 6 -12 months. This would allow time to increase rate payer knowledge and competence in conservation and immediate leak detection behaviors.

- I appreciate that this is an issue that has multiple aspects to it. I know it is complex. I would suggest the following to further enhance WATER AFFORDABILITY FOR ALL DETROITERS:
  - 4,500 gallons per month is not enough for a family of more than 3 so much depends on the needs of each household
  - Why not start with a survey and help that includes water usage and pluming audit for households to determine realistically what their water usage is? I know you have this in place but promote it and make it easy for people to take advantage of it. Come to neighborhoods and do it by blocks or sections. This may give you data you don't have or refine the data you have at the moment.
  - What about educating all of us on water conservation, ways that will help reduce water usage?
  - Invite people from the committee to be at the table of planning decision-making regarding all this. Become familiar with the realities of those most in need in our city and go from there. Maybe ask those who have extra to pitch into a fund for water affordability for Detroiters? Plans must take into consideration these voices and life realities of all affected
  - Lastly keep working with organizations that know the community and can help further enhance and improve DWSD plan and monitoring efforts, so it is a Win-Win at the end? Partnerships with government agencies /officials with orgs that help people in need on a daily basis like Peoples Water Board, We the People of Detroit.
- This is a huge step forward for Detroit! There are a few things that remain to be addressed, however:
  - 1. 4500 gallons of water per month may not be enough to cover all households, particularly those who have more than 3 people in the home. DWSD should consider a flexible plan based on number of people in a home.
  - 2. It is important for DWSD to identify a permanent funding solution to maintain water affordability for all Detroiters. Otherwise this great program could be withdrawn at some point in the future.
  - 3. In order to ensure the program evolves and adapts properly, DWSD should outline a process for continued community engagement, communication, and program data review going forward.

Again, I am very impressed with the progress that has been made. My suggestions above will help to ensure the long-term success of the program.

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