



May 27 2016

Lynn M. Ross, AICP
Deputy Assistant Secretary for Policy Development
Office of Policy Development and Research
U.S. Department of Housing and Urban Development
Washington, DC 20026

Re: HUDUSER Research Roadmap Public Comment

Dear Ms. Ross:

On Behalf of the National Human Rights to Water and Sanitation Coalition, we would like to thank you for the opportunity to submit public comments on HUD's research agenda. We respectfully submit the following recommendations.

As a coalition of grassroots and non-profit organizations working towards the realization of the human right to water in the United States, we are eager to see HUD's research expand to address **water and sanitation affordability, safety, and access** as a new priority research project.

The cost of water and sanitation services has risen 40% from 2010-2015 in households across 30 major U.S. cities, according to a research study by Circle of Blue.¹ Water bills in Seattle now top over \$300 a month for a family of four. When households can't afford to pay their water bills, they face utility shutoffs that make their home uninhabitable. As a result of water shutoffs, families are losing their homes to tax liens on their property, threatened with the removal of their children to Child Protective Services for uninhabitable conditions, and facing serious risks to their health. **In Detroit alone, 64,000 residents lived without water due to shutoffs in 2015, including children, the elderly, and disabled.** Another round of 400 to 500 shut offs per week has already begun in May 2016.

For communities like Flint, Michigan that are forced to live with contaminated drinking water, such **contamination also raises the cost of water service and can lead to shutoffs**. Contamination increases the cost of water in two ways: 1)

¹ <http://www.circleofblue.org/2015/world/price-of-water-2015-up-6-percent-in-30-major-u-s-cities-41-percent-rise-since-2010/>

residents pay twice for water because they must continue paying for the unsafe water provided by the local utility yet also pay for alternative safe sources, and 2) the utility company charges increasingly high water rates to cover the cost of testing, fines imposed by state regulators, providing service to a diminishing customer base, or financing and operating a treatment facility.

Despite this growing crisis, there are no federal datasets that track the increasing cost of water and sanitation services to households, the number of water shutoffs nationally, or the scale of the harmful collateral impacts caused by shutoffs.

There are some basic questions that could be incorporated into the American Housing Survey and American Community Survey that would help the U.S. federal government begin to identify the extent of the problem and calculate the multiplicity of household and community social, health, and economic impacts the lack to access to affordable and safe water creates. In order to capture the full picture of the water crisis facing the United States today, we recommend the following:

1. **Track and publish the cost of water and sanitation services** to households throughout the United States. Include demographic data to allow analysis of costs by race, gender, ethnicity, whether a household is urban or rural, and household income.
2. **Create, calculate and publish a “water affordability index”** and consequent rating for cities and towns by comparing the costs of water to monthly household incomes, with more than 2.5% of income spent on water considered unaffordable according to international standards.
3. **Collect and publish data on the number of households which have experienced utility shutoffs**, especially of drinking water, for failure to pay, correlated with key demographic characteristics (e.g. racial/ethnic identity, gender of primary householder, age, presence of children, etc.)
4. **Track secondary impacts of water shut offs such as loss of the home, the removal of children, and health consequences.** Track the incidence of water or sanitation-related problems that have resulted in the loss or threatened loss of housing, particularly water shut offs, home foreclosures triggered by water debt, lack of adequate water or sanitation infrastructure, or water contamination.
5. **Correlate water shut offs with other problems related to water and sanitation service delivery**, particularly contamination of the drinking water supply (e.g. as indicated by violations of Safe Drinking Water Act standards) and infrastructure deficits (e.g. as measured by the frequency of water main breaks, water bond or other public financing borne in part or full

by ratepayers to cover infrastructure improvements to the water system, etc.).

6. **Investigate and publish a report of the possible discriminatory impacts of water unaffordability, contamination, infrastructure deficits, and shutoffs by race, gender (female-headed households), and physical ability** to determine if there are civil rights violations resulting from unequal impacts.
7. **Request data from public housing agencies that administer HUD local housing choice voucher programs related to water shutoffs (and other utilities) at residences owned by homeowners who accept Section 8 tenant-based assistance;** and if the water utility payment responsibility belongs to the homeowner or tenant. [There has been an increase in reports of Section 8 tenants having their water shut off by homeowners who are not paying.]
8. **Investigate the human, societal, and economic costs of rising expenses for both water and housing for low-income families and people of color in the United States,** taking into consideration the compounded impact of water unaffordability with housing costs, insecurity of water resources, and population growth as well as the projected risks for external shocks such as economic volatility and climate change.

Specific questions that may be incorporated into the American Community Survey to address water unaffordability and safety include:

- Is your tap water safe for drinking?
- Do you have access to sufficient water for your family's use?
- Do you have access to adequate sanitation for your family's use?
- Has your water ever been disconnected because of unaffordable costs?
 - Is it currently disconnected?
 - Have you been forced to move or relocate because of unaffordable water costs?
- Approximately what percentage of monthly income do you spend on water services, including sewer, stormwater, and other related charges?
- Is your water contaminated? If so, how much money do you spend per month to access safe water?
- If you have experienced homelessness in the past year, did you have access to sufficient water and sanitation services?

Additionally, please see attached two supporting documents: a letter from a member of our network regarding her experience of homelessness; and the executive summary of a study by We the People Detroit on water quality and shutoffs.

We would be more than happy to be available for any questions regarding these recommendations; please contact Hannah Hafter, Unitarian Universalist Service Committee, at hhafter@uusc.org or 617-301-4368 for further discussion. We are grateful for HUD's commitment to producing accurate data for the purposes of guiding effective programs and policy.

Sincerely,

**National Human Rights to Water and Sanitation Coalition of the
U.S. Human Rights Network**

And Member Organizations:

Unitarian Universalist Service Committee

Michigan Welfare Rights Organization

The Environmental Justice Coalition for Water

Water Alliance

We the People of Detroit

Color of Water Project

San Jerardo Cooperative, Inc.

International Human Rights Clinic, Santa Clara University School of Law

Community Development Clinic, University of Baltimore School of Law

Annex 1: Letter from Kelly Miller, member of the National Coalition for the Homeless Speakers Bureau

Brief Biography of Kelly Miller:

Ms. Miller, currently experiencing homelessness herself, devotes an extraordinary amount of time to advocating not only for her own needs, but for the needs of the broader homeless community. She is a persistent advocate for homeless persons and survivors of domestic violence, and against political corruption. Ms. Miller received her undergraduate degree from Morehead State University as well as a Master's in Adult Education and a Master's in Counseling and is a certified Counselor. She has a long history of public service. Ms. Miller was a Liaison for the National Job Corps Organization under the Department of Labor. In 2002, Ms. Miller was honored by the Lt. Governor as a Kentucky Colonel and an ambassador for Kentucky for her diligent work in the community. Ms. Miller has extensive experience speaking publically in the political, business and community arena as a cultural ambassador of the Job Corps organization. She participated in the coalition's presentation before the Inter-American Commission on Human Rights in April 2016, where she eloquently spoke to both her own experience being denied access to water and sanitation as well as the systemic issues, including barriers to access to housing, that created her situation.

Letter:

Dear Ms. Ross:

According to research conducted by the National Coalition for the Homeless and provided on their official website, the top 5 reasons for homelessness are Foreclosure, Poverty, Eroding Work opportunities, Decline in public assistance and Lack of affordable housing. Surprising factors coming in lower on the list are Lack of health care, Domestic violence, Mental illness and addiction disorders or substance abuse. In addition, 50% of the cities surveyed by the U S Conference of Mayors identified "domestic violence" as a primary cause of homelessness.

Nowhere in the national statistics was "laziness" or "because you done something wrong and you deserve to be homeless" identified as contributing factors for homelessness. Unfortunately, these are two of the primary labeling factors homeless individuals face from society as a whole wearing blinders to the real issues.

Now I can go on and on providing you numerous boring statistics which have been cited in every outcry for assistance until they have fallen on deaf ears, not to mention it is truthfully someone who gets paid for representing an organizations position and duty to keep you informed and not the responsibility of a homeless individual.

Yes, I am a "Real" homeless female currently experiencing homelessness in Washington, D.C. the third largest homeless city in the nation. So as a current expert in the field of homelessness regarding fair housing and right to clean water and sanitation issues I feel I

would be providing a disservice to you the audience as well as myself if I did not utilize my expertise and enlighten you on the “Real” needs and issues.

No, I'm not currently employed by any organization to compose or lobby for funding assistance and no I don't receive money for my opinion and I'm not currently employed. Technically it's not my job to stand and fight for Human Rights. However, as a human it is my position to fight for my human rights and those of others.

I am the “True” face of homelessness. The face that you wouldn't know is currently experiencing homelessness because I work hard every day to search and find access to clean water and sanitation to maintain my appearance to society in the hopes of being heard and seen as having value rather than the devalued opinion expressed upon homeless individuals who are not as fortunate as to be able to access clean water and sanitation on a daily basis.

Sometimes I have to spend the whole day going from one end of town to the other to accomplish the simple tasks of finding food to eat, a place to take a shower and a facility to wash my clothes and then I lay down outside to sleep hoping I have chosen a safe place and will not be violated during the night as I sleep or as I attempt to perform basic bodily functions which as a female to conduct basic bodily functions it is required I expose myself to possible physical violence and rape.

Before I became homeless as a direct result for standing up for my rights and the rights of others, I had a very rewarding career and middle class home. I have two master's degrees and am a certified counselor. Just like thousands of Americans I have never done anything wrong to be subjected to homelessness. I do not fall into the government's three tier homelessness categories. I am not a substance abuser or experiencing mental illness nor have I committed any crime. Unfortunately, these are the three categories that homeless individuals must chose to align themselves with in order to receive housing assistance. It doesn't matter if one of these three categories fit you or your situation according to the government and society if you fail to choose to accept one of the categories as your identifying category you will fail to receive assistance from the government in receiving housing.

Now as I mentioned previously I am currently homeless and unemployed therefore I can say these things to you and not fear retribution or dismissal of my position because there's nothing left to take from me. Tonight I will again sleep in the streets of Washington, D.C. choosing the safest place I know and lay down outside to sleep and hoping I chose a safe place.

It is a travesty that my being homeless and sleeping on the streets of Washington, D.C. Is more profitable and exploitable to government organizations than for those same government organizations who are using me to say what they cannot say to provide me housing assistance.

I was told the reason I would be a great asset to sit on a national advisory panel was because I am currently experiencing homelessness as if I receive housing I would lose my value as a homeless person. Are you gonna tell me that as technology advanced as we are as a country that as a society we breed homelessness for profit and exploitation rather than to provide assistance which will eliminate my and others homelessness?

I am ME whether I have a home or not.

I am ME whether I have eaten that day or not.

I am ME whether I have taken a shower.

I am ME whether I have combed my hair and found clean clothes to wear.

I am ME, the same person as the day before homelessness became a part of MY life.

ME, I am always ME despite LIFE'S storms and strife.

I ask all of you this. Take the "Homeless challenge" with me. Come out of your comfort zone and that narrow judgmental box you sit in and spend a night or two on the street with me. You will return to your comfortable homes and life's unharmed but hopefully you will be fully grown enlightened by your awareness and better prepared to produce effective programs and provide the assistance to those who need assistance. Come walk a day with me in my shoes. I promise you it will be an enlightening experience.

I am human. I have value.

Kelly Miller

Executive Summary

We the People of Detroit Community Research Collective

We the People of Detroit Community Research Collective (WTP CRC) is a collaboration between community activists, academics, researchers and designers. Our research is produced with and for the citizens of Detroit. This research has been used in a wide range of settings, from community organizing to legal and legislative work. We hope that our work will be of further use to Detroiters in their efforts to build a more democratic city.

The research itself, led by We the People of Detroit, has four parts:

- 1) Mapping and otherwise visualizing publicly accessible data to understand the geographic and systematic impact austerity policies on the City of Detroit [ongoing],
- 2) A city-wide community survey, adapted from the Center for Disease Control's CASPER toolkit for assessing health needs after a disaster [ongoing],
- 3) A citizen-science project to test the impact of water shutoffs on residential water quality [Spring 2016],
- 4) A story-mapping project to support youth in telling individual and collective narratives about the impact of austerity policies on their community [Summer 2016].

We the People of Detroit is dedicated to community coalition building and to the provision of resources that inform, train and mobilize the citizens of Detroit to improve their quality of life.

Monica Lewis-Patrick	Co-Founder, President and CEO of We the People of Detroit
Debra Taylor	Co-Founder/Director of Finance and Development, We the People of Detroit
Nadia Gaber	MSTP MD/PhD Student, University of California Berkley
Andrew Herscher, Ph.D.	Associate Professor of Architecture, University of Michigan
Gloria House, Ph.D.	Professor Emeritus, University of Michigan Dearborn and Wayne State University
Emily Kutil	Adjunct Professor of Architecture, University of Detroit Mercy
Kate Levy	Filmmaker, detroitmindsdying.org
Thomas Pedroni, Ph.D.	Associate Professor of Curriculum Studies and Policy Sociology, Wayne State University Director of Detroit Data and Democracy Project
Kaitlin Popielarz	PhD Student, K-12 Curriculum and Instruction, Wayne State University

Mapping and Visualizing of Publicly Accessible Data:

As part of the data visualization project, WTP CRC is currently publishing the first of a three-part series documenting the social consequences of austerity policies and Emergency Management in Detroit, focusing in particular on the racial inequity of these policies. We define austerity policies as public policies that prioritize financial goals over the well-being of citizens. The first publication is focused on water, and the following publications will focus on education and land ownership.

WTP CRC has used the knowledge gained through working with public data to lead community workshops about how to make FOIA requests, and is currently working with the Detroit Health Department to use the data to illustrate the impact of water shutoffs on public health.

City-wide Survey:

In order to create a baseline picture of health needs in Detroit, Nadia Gaber, a medical anthropologist and MD/PhD candidate at the University of California San Francisco, led an effort utilizing a novel application of a tested methodology for rapid, accurate data collection: the Centers for Disease Control's CASPER toolkit for post-disaster health needs assessment. The tool uses a cluster sampling method, which we applied to 30 city blocks in the City of Detroit.

The data is still being analyzed, but these are preliminary findings:

- 1) There were many examples of residents using bottled water due to mistrust of their water supply, with some residents reporting that their water looked, tasted, or smelled dirty.
- 2) Paying for water was more stressful for people than paying for their rent/mortgage, and more of a burden than any other utility.
- 3) People encountered trouble taking care of themselves (medications, inhalers, respirators, etc) without a trusted source of tap water.
- 4) Disconnection from the full network of services may be what is driving the high vacancy we encountered, in addition to making it very difficult to study (though our tool can't capture this specifically).
- 5) Very few people received notices about impending shutoffs or the public health consequences of not having running water.
- 6) Despite a high rate of health issues in the household, most people were in fact able to get access to medications and keep the heat on for example, even if their water was or had been shut off. This testifies to local resilience and the dramatic impact of affordability plans (like DHS) in keeping people in their homes.

Beginning in Spring 2016, WTP will host community meetings to share the research with the community, and to discuss next steps.

Water Testing

In partnership with Dr. Jennifer Carrera, jointly appointed in the Department of Sociology and the Environmental Science and Policy Program at Michigan State University, WTP will begin a pilot study this spring to test water in Detroit homes. Residents will test their water before they are shutoff, immediately after their service is restored, and 24 hours after service is restored.

Story-Mapping

This summer, WTP will work with youth interns to create intergenerational film narratives about the impact of water shutoffs, foreclosures, school closings, and other austerity policies on their community, as well as narratives about community resilience. The narratives will be mapped and overlaid with the other data in an interactive website.