Request for a Nationwide Water Shutoff Moratorium

Dear Director Redfield:

On behalf of our members and supporters, we, the undersigned 121 organizations, call on you to take urgent action to stop water shutoffs nationwide to help protect people from Covid-19. We ask that you use your authority under Section 361 of the Public Health Services Act to impose a nationwide moratorium on water service disconnections for nonpayment during the Covid-19 pandemic with safe service restoration for all households previously disconnected.

Water is critical for disinfection and sanitation to control the spread of Covid-19. One of the Centers for Disease Control and Prevention’s top recommendations to help stop the spread of disease is thorough and frequent handwashing, but without access to water, people cannot follow this simple — yet crucial — advice. Strikingly, research from We the People of Detroit identified a direct correlation between zip codes with highest rates of water shutoffs and the highest COVID-19 cases in Detroit, and found a substantial, statistically significant effect of water insecurity on psychological distress (see appendix).

Water shutoffs pose a real threat to human health. Right now, thousands of people could be living without running water in their homes; they do not have water to drink, bathe, clean and disinfect, wash their hands, or flush their toilets. Households that have their water shut off will be even more vulnerable to the rampant spread of the coronavirus endangering the health and safety of entire communities. Seniors, pregnant women, young children and people with diabetes and other illnesses are especially vulnerable.

As of October 1, less than half of the country was protected from water shutoffs by a state or local moratorium, as more than 180 local and state protections have expired. An estimated 177 million people are not protected under a local or state water shutoff moratorium, and hundreds of thousands of people are at risk of water shutoff across the country because they have fallen behind on their water bills (see appendix).

Now is the time to act to help prevent this deepening public health disaster by issuing a nationwide water shutoff moratorium.

Sincerely,
National
Action Center on Race and the Economy
American Rivers
Campaign for Lead Free Water
Center for Biological Diversity
Corporate Accountability
Daughters of Charity of St. Vincent de Paul
Earthjustice
Food & Water Action
Friends of the Earth U.S.
Greenpeace US
Justice Action Mobilization Network
Kairos Center for Religions, Rights and Social Justice
League of Conservation Voters
NAACP Legal Defense and Educational Fund Inc. (LDF)
National Coalition for Legislation on Affordable Water
National Welfare Rights Union
Natural Resources Defense Council
Nuclear Information and Resource Service
Oil Change International
Physicians for Social Responsibility
Progressive Democrats of America
Public Citizen
Recode.org
River Network
Sisters of Charity Federation
Sisters of Mercy of the Americas Justice Team
The Democracy Collaborative

Regional
Alliance for the Great Lakes
Citizens United for Renewable Energy (CURE)
Earth Ethics, Inc.
For Love of Water (FLOW)
Freshwater Future
Michigan Citizens for Water Conservation
Sisters of the Presentation of the Blessed Virgin Mary, New Windsor, NY
Ursulines of the Roman Union - Eastern Province
We the People of Detroit

**Alabama**
Alabama Arise
Cahaba River Society
Dynamite Hill-Smithfield Community Land Trust
SWEET Alabama

**California**
Community Water Center
Lady Freethinker
MLK Coalition of Greater Los Angeles
North County Watch
Restore the Delta
Social Eco Education (SEE-LA)

**Colorado**
San Luis Valley Ecosystem Council

**Florida**
Nature Coast Conservation

**Illinois**
Clean Power Lake County
Faith In Place Action Fund
Metropolitan Planning Council
Prairie Rivers Network
She Votes Illinois

**Indiana**
Citizens Action Coalition of IN
Iowa
Iowa Citizens for Community Improvement
Iowa Unitarian Universalist Witness/Advocacy Network

Louisiana
350 New Orleans

Maryland
Chesapeake Physicians for Social Responsibility
Cleanwater linganore Inc.
Homeless Persons Representation Project, Inc.
Prince George's County Peace & Justice Coalition
Public Justice Center

Massachusetts
Fore River Residents Against the Compressor Station
Old Stone Mill Center Zero Waste Maker Space
Take Back the Grid

Michigan
48217 Community and Environmental Health Organization
Detroit Jews for Justice
Detroit Metro United Church of Christ Social Justice Team
Flint Rising
James and Grace Lee Boggs Center
Michigan Coalition for Human Rights
Michigan Welfare Rights Organization
NMEAC
People's Water Board Coalition
The Original United Citizens of Southwest Detroit
Title Track
Water You Fighting For?
Minnesota
Community Power
Cooperative Energy Futures
COPAL MN

New Jersey
Coalition Against Pilgrim Pipeline - NJ
Franciscan Response to Fossil Fuel
Indivisible NJ5
Lutherans Engaging in Advocacy Ministry NJ
MoveOn.org Hoboken
New Jersey Tenants Organization
NJ State Industrial Union Council
Occupy Bergen County
People Demanding Action
Unitarian Universalist Fellowship of Sussex County
WATERSPIRIT

New Mexico
Common Ground Community Trust
Concerned Citizens for Nuclear Safety
New Energy Economy
We Are One River

New York
Center for Elder Law & Justice
Church Women United in New York State
Environmental Advocates of NY
Erie County Bar Association Volunteer Lawyers Project
Franciscan Sisters of the Atonement
Legal Aid Bureau of Buffalo, Inc.
Long Island Progressive Coalition
Metro NY Catholic Climate Movement
New York Communities for Change
New York Public Interest Research Group (NYPIRG)
North American Climate, Conservation and Environment (NACCE)
NYC H2O
Partnership for the Public Good
Save the Sound
Seneca Lake Guardian
Stop the Algonquin Pipeline Expansion
Western New York Law Center

North Carolina
River Guardian Foundation

Oregon
Portland Citizens for Lead-free Drinking Water
Rogue Climate

Pennsylvania
Pennsylvania Utility Law Project, on behalf of our low income clients
Water rights awareness of Pennsylvania

West Virginia
Mountain State Justice, Inc.

Wisconsin
Milwaukee Riverkeeper
Milwaukee Water Commons
Appendix

Research


Water Shutoff Moratoria

- According to Food & Water Action's live tracker of water shutoff moratoria:
  - As of October 1, 2020, 46 percent of the country – 151 million people – remains protected under a water shutoff moratorium. This is down from a high of two-thirds of the U.S. population that had been protected.
    - An estimated 177 million people are not protected under a local or state shutoff moratorium.
    - One in five people nationally have lost protections from water shutoffs because of expiring local and state moratoria — 63 million people have lost protections.
    - At least 182 moratoria, including nine comprehensive statewide orders, have expired.
  - Over the month of September alone, an additional 32 local and state moratoria expired, affecting 6.5 million people.
  - By November 2, only five states could have a comprehensive water shutoff moratorium in place: California, New Jersey, New York, Vermont and Washington State.

- NRDC - “Congress & States Must Protect Water Access During COVID-19”
Shutoff Data

- In Florida, Orlando and Jacksonville shut off hundreds of households a day from water and power in July and August. Orlando alone had 15,000 customers who were eligible for shut off, and in Jacksonville, JEA had disconnected 22,000 customers since July 10, as of October 8.
- In South Carolina, Charleston shut off water service to 3,137 households in the last two weeks of August, and another 4,000 customers were at risk of shut off as of September 1.
- In Tennessee, Memphis, 9,000 homes were disconnected from utilities on August 24, the first day of resumed shutoffs, and around 31,000 customers were at risk of being cut off.
- In Texas, Laredo said that 17,000 households were behind on their bills and could be shut off from water, as of September 3 - that’s nearly 20% of its customers.
- In Illinois, Aqua Illinois sent out 15,120 water shutoff notices in August - that’s 20% of its customers. The state ICC moratorium expired September 1 (source: docket information).
- In Arizona, Mesa had 9,240 customers and Scottsdale had 1,422 customers who were behind on their bills and could face water shutoff as of September 1.
- In Alabama, 12,000 customers of Birmingham Water Works were facing shut off as of October 14.
- In Pennsylvania, as of September, regulated water utilities reported 106,766 residential customers were at risk of disconnection; the PUC moratorium ends November 9 (source: docket information).
- In North Carolina, 146,704 residential customers became eligible for water shut off in July (source: docket information).