

April 2, 2019
Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Certification Policy Branch:

The Marin CalFresh Task Force would like to take this the opportunity to comment in opposition to USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). The proposed changes would cause serious harm to our clients, our community and the nation.

The Marin CalFresh Task Force is composed of diverse, multi sector serving organizations working in partnership to support the utilization of the CalFresh program. We have had a lot of success in helping to reduce churn and create systems that support the equal access to the CalFresh Program.

While Marin County is predominantly perceived as a wealthy county, there are many gaps in access for the underserved communities. This creates a downward fall in longevity and quality of life.

There is a 15-year difference in life expectancy between residents of Ross, whose residents are mostly affluent and white, and residents of Marin City, who are mostly black and poor. A similar pattern emerges when the child poverty rankings in the new report are examined. Marin's 9 percent child poverty rate is the third lowest in the state, but that is an average for all children living in Marin. The child poverty rate among black children in Marin is 22 percent and for Hispanic children it is 24 percent.

<http://www.phi.org/news-events/1404/marin-regains-rank-as-states-healthiest-county>

While we may not have a high unemployment rate, people have had to move out of their community in Marin to other counties to afford housing. More than 50% of our workforce lives outside of the county because they can't afford to live in our county. This equates to about 600,000 people.

http://marin.granicus.com/DocumentViewer.php?file=marin_8a334ed6963f307d4951e2061eec5fd7.pdf

As we compare the California state average on rent for a one-bedroom is \$1,335, In Marin it's \$2,499.

<https://reports.nlihc.org/oor/california>

Furthermore, one in five Marin County residents lives below 200% of the Federal Poverty Level and is at risk of food insecurity. SNAP plays a critical role in addressing hunger and food insecurity in our County, and nationwide. It is the first line of defense against hunger for over 9,000 Marin residents,

1,000 of whom are affected by the ABAWD requirement starting in September 2019.

The Marin CalFresh Task Force strongly opposes policies like this proposed rule that would expose even more people to the arbitrary SNAP food cutoff policy and harm our community on food insecurity. In partnership, we work hard to ensure everyone has equal access and oppose policies that penalize our low-income community.

Sincerely,

Marin CalFresh Task Force