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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:

I write to you today as a Board member for Food for People, The Food Bank for Humboldt County, with great concern about the grave impact that the proposed rule on worsening hunger, poverty and the ability for food insecure adults to find and maintain work.

**SNAP is Achieving its Mission to Reduce Hunger and Improve Health in Humboldt County**

Simply put, the SNAP program is fighting hunger and improving the health of our community, and cuts such as envisioned in the proposed rule would threaten the lives and well-being of a significant portion of our entire County population. In 2016-17, the California Budget & Policy Center estimated that SNAP benefits go to 21,100 people in Humboldt – nearly 1 in 6 of everyone who lives in the County.

<http://calbudgetcenter.org/resources/calfresh-reduces-hunger-every-county-california-changes-federal-level-cut-benefits/>

Within that startling need for assistance, however, the number of people of color receiving SNAP in Humboldt County is approximately 37%:

[https://www.kidsdata.org/topic/801/food-stamps-race/table#fmt=2361&loc=2,127,347,1763,331,348,336,171,321,345,357,332,324,369,358,362,360,337,327,364,356,217,353,328,354,323,352,320,339,334,365,343,330,367,344,355,366,368,265,349,361,4,273,59,370,326,333,322,341,338,350,342,329,325,359,351,363,340,335&tf=84&ch=7,11,1141,10,9,73,127&sortColumnId=0&sortType=asc](https://www.kidsdata.org/topic/801/food-stamps-race/table#fmt=2361&loc=2,127,347,1763,331,348,336,171,321,345,357,332,324,369,358,362,360,337,327,364,356,217,353,328,354,323,352,320,339,334,365,343,330,367,344,355,366,368,265,349,361,4,273,59,370,326,333,322,341,338,350,342,329,325,359,351,363,340,335&tf=84&ch=7).

According to the California Department of Social Services, as of July 2018, this population included more than 1,036 household contacts that identified as American Indian or Alaska Native. (CDSS DFA 358) This is a population that has the highest levels of food insecurity of any ethnic group in California.

A reduction in time limit waivers and the resulting loss in SNAP benefits will disproportionately affect certain protected classes based on (a) an inadequate method for determining lack of sufficient jobs, a criterion for approving time limit waivers; and (b) the disproportionate rate of unemployment and underemployment for people of color.

The civil rights impact statement and the proposed rule offers insufficient data and information about the extent of the disparate impact, any mitigation strategies that the USDA and/or states may undertake to address or reduce those impacts or details about the civil rights plan to monitor or address the issue.  We do not believe that the proposed mitigation strategies can be significant enough to fully address the disproportionate impact of increased food insecurity and poverty on protected classes. This is a deeply troubling omission given that rates of food insecurity are already higher than the national average for Black and Latino headed households.

**SNAP Supports the Humboldt County Economy, and the Proposed Rule Would Worsen Employment**

SNAP is also an economic lifeline in Humboldt County. In July 2018, the most recent month for which available from the California Department of Social Services, SNAP brought $2,678,437 in federally funded nutrition benefits to the County. Following USDA’s established $1.79 economic multiplier, this means that SNAP generated some $4,794,402 in total economic activity.

<https://www.cdss.ca.gov/Portals/9/DSSDB/DataTables/DFA256FY18-19.xlsx>

The withdrawal of these benefits is magnified by the robust public-private partnerships that support the SNAP program in Humboldt County. Humboldt County is home to several important growing regions, grocery stores and other food outlets that are critical hubs in isolated towns, and the large distances between communities’ means that transportation is a vital segment of the food economy as well. By cutting SNAP benefits, the proposed rule would have spillover effects across our food sector as when hungry adults lose their SNAP resources, stores will have to cut back on staff or potentially shutter. Moreover, Humboldt County boasts a strong network of farmers markets that accept SNAP and by severely limiting the ability of California to provide SNAP benefits to unemployed and underemployed adults, the proposed rule would not only worsen hunger but actually remove much-needed resources from our food economy, deepening the economic hardship it purports to improve.

**The Proposed Rule Would Disproportionately Harm Rural Areas Like Humboldt County**

The California Center for Rural Policy conducted a Rural Health Information Survey of adults residing in a four county area (Humboldt, Del Norte, Trinity, and Mendocino). This survey revealed the stark nature of hunger and poverty in this rural, isolated area, and shows that rural poverty has numerous impacts on the health of these communities.

“Compared to respondents living at or above 300 percent of the federal poverty level, those living below the federal poverty level in the four-county area were:

* 5.3 times more likely to report an inability to get needed health care
* 5.2 times more likely to report a lack of transportation as a problem in meeting their health needs or those of their family
* 11 times more likely to report no vehicle in the household
* 8.4 times more likely to report no phone in their home
* 5.2 times more likely to have no health insurance
* 26.5 times more likely to experience very low food security.”

By imposing significant paperwork and reporting requirements on adults deemed ABAWDs, the rule would disproportionately impact those in rural communities such as Humboldt County that suffer from inadequate broadband access and even basic postal service. According to Connie Stewart, executive director of the California Center for Rural Policy at Humboldt State University, these rural Californians already face the kinds of delays and gaps in mail service that could lead to a discontinuation in SNAP access simply due to inadequate postal or communication service, even if the adult was working sufficient hours:

”I think the first thing is that everyone recognizes the postal service is in a difficult situation,” Stewart said. “But for rural Americans, there’s so many places even in our region of the world, that don’t have broadband. Mail is their option, especially for more remote areas of this county, Trinity County and Del Norte County. There are many rural communities that are completely dependent on the postal service, and it is a vibrant part of their lives. They don’t have the chance to email the bill.”

<https://www.times-standard.com/2013/02/07/local-residents-have-mixed-reactions-to-proposed-mail-delivery-changes/>

**Existing ABAWD Regulation Provide Crucial Certainty Upon Which the Humboldt County Food Bank Relies**

Indeed, Food for People relies on the existing regulations, firmly established over the past two decades, to deliver the most food resources to hungry residents; the proposed rule would overwhelm the food bank’s ability to meet the need in Humboldt County. Feeding America estimates that for every meal provided by food banks, SNAP provides 12. Food for People simply could not make up the meals lost by the drastic cuts as envisioned in the proposed rule. For example, Food for People is already overstretched serving communities like Hoopa that lost its grocery store in 2016, meaning that the tribal community was nearly completely reliant on external nutrition assistance.

<https://kymkemp.com/2016/06/17/hoopas-only-grocery-store-to-close-because-of-rat-infestation/>

This is compounded by the fact that Native American tribes in Humboldt County already face a shortage of traditional foods like Chinook salmon. <https://www.sacbee.com/news/state/california/water-and-drought/article144768959.html>

California’s climate assessment further indicates that long-term climate patterns of deeper droughts and warming temperatures will worsen the availability of native foods, significantly increasing the importance of hunger relief programs like Food for People and yet our programs could not withstand the sudden increase in demand posed by the proposed rule.

<http://www.climateassessment.ca.gov/state/docs/20180928-TribalCommunitySummary.pdf>

Moreover, Food for People has experienced enormous fuel, maintenance and staff costs to transport food around major road closures due to mudslides and washouts following devastating rains.

<https://www.times-standard.com/2019/02/27/storm-update-eel-river-valley-deals-with-flooding-road-closures/>

In short, the proposed rule ignores core parts of the problem sought to be addressed by the previous agency policy concerning the ABAWD waiver: namely the impact on general health and welfare that would be caused by a potential chilling on individuals’ participation in the food program, including public health, work access, hunger, cost-benefits of implementing the rule, administrative ease of the rule, etc.

In addition, the rule would exacerbate the already high hunger & poverty experience in California’s North Coast, by taking vital food assistance away from adults who need it most.

We ask you to withdraw this proposed rule and prevent the hunger and hardship certain to prevail in Humboldt County should it become law.

Sincerely,

Board of Directors

Food for People, Inc.

The Food Bank for Humboldt County, California