



# CITY OF OCEANSIDE

WATER UTILITIES DEPARTMENT



Monday, January 21, 2019

Ms. Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter - Options for Implementation of a Statewide Low-Income Water Rate Assistance Program**

**Dear Ms. Townsend:**

On behalf of the City of Oceanside, I would like to thank the State Water Resources Control Board (the State Board) for the opportunity to provide input on the proposed "Options for Implementation of a Statewide Low-Income Water Rate Assistance Program." Everyone deserves safe drinking water and the City of Oceanside (the City) supports the objective to increase accessibility and affordability for all Californians.

While the intention of the program is admirable, none of the alternatives provided for structuring such a program come without their own set of unique drawbacks and challenges. Foremost among these is the fact that most low-income residents reside in multi-family dwellings with no individual service and no receipt of a water bill. In fact, there is no requirement, and therefore no uniformity, in how and to whom water service is assigned, so use of such a methodology is unreliable and disproportionate. Moreover, the City has an obligation as a publicly owned water utility to comply with Proposition 218 requiring voter approval for taxes, fees, and charges as well as a clear-cut nexus to cost of service. And as for commonality in rate structures among water agencies, just as there are no two cities, business districts or individual constituencies that are the same, so too are there no two rate structures alike. Water rate structures are based off of the characteristics of the community in which the water is serviced in and requiring implementation of a progressive rate structure simply would not fit the needs of every community. It is because of conflicts such as these, which would impair our ability to provide service through fair and equitable rates, that the City cannot support the Community Water System (CWS) as a means for generating revenues and distributing benefits.

In order to establish a successful means for increasing accessibility and affordability to clean drinking water, the City strongly encourages the State to employ an existing program such as income tax, which provides a more universal reach. We recommend and support the use of income tax to both fund the program and distribute the benefit for a more fair, equitable and proportional approach to reaching those in need.

Thank you again for providing us the opportunity to comment on this topic and for consideration of our suggestions and recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cari Dale". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Cari Dale  
Water Utilities Director  
City of Oceanside