



March 31, 2026

The Honorable Christopher M. Ward
California State Assembly
1021 O Street, Suite 6350
Sacramento, CA 95814

**Re: AB 2180 (Ward): Proposition 218 Omnibus Implementation Act
City of Upland – Notice of Support**

Dear Assemblymember Ward,

On behalf of the City of Upland, I am writing to express our support for AB 2180 (Ward), relating to the Proposition 218 Omnibus Implementation Act. As a public agency responsible for providing wastewater collection and treatment services, we recognize the importance of clear statutory guidance that promotes transparency while ensuring fairness in the establishment of property-related service charges.

AB 2180 provides important clarification regarding how local governments may demonstrate compliance with the constitutional requirement that fees not exceed the proportional cost of service attributable to each parcel. Specifically, the measure authorizes a local government to demonstrate proportional cost through any method that reasonably allocates the ascertainable cost of providing service to all parcels, provided that the allocation is substantiated by existing or reasonably estimated data. This clarification appropriately reflects the practical and technical realities involved in conducting cost-of-service analyses for wastewater systems.

Importantly, AB 2180 clarifies that, when imposing a fee or charge for water or sewer service, an agency is not required to provide an exact parcel-by-parcel measure of service costs. Instead, agencies may impose uniform or tiered fees for parcel or customer classes defined by common characteristics indicative of likely sewer use, such as land use, parcel improvements, or peak demand characteristics. The bill further confirms that proportional costs within each tier may be supported by any reasonable cost allocation methodology that reflects the service cost.

These clarifications are essential for cities that operate complex wastewater treatment and conveyance systems. AB 2180 preserves constitutional safeguards while providing agencies with the flexibility necessary to design rate structures that reasonably reflect the cost of service, ensure equitable cost distribution among ratepayers, and maintain the long-term financial sustainability of critical public health infrastructure. By expressly recognizing reasonable cost allocation methodologies and tiered rate structures, the bill strengthens the legal framework supporting defensible and transparent sewer rate setting.

For these reasons, the City of Upland supports AB 2180 (Ward).

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Velto".

Bill Velto
Mayor
City of Upland