Monday, January 21, 2019

Mr. Francisco Guzman
California Water Plan Update 2018
Strategic Water Planning Branch
Statewide Integrated Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Sent via email to: cwpcom@water.ca.gov

Subject: Comments on Public Review Draft of Water Plan Update 2018

Dear Mr. Guzman:

On behalf of the City of Oceanside, I would like to thank the Department of Water Resources (DWR) for the opportunity to provide input on the Public Review Draft of the Water Plan Update 2018 (Update 2018). Comments are provided in accordance with the recommendations found in DWR’s Reviewer’s Guide.

General Comments

1. Funding Mechanisms and Opposition to Water Surcharge Fee

   In Update 2018, the City of Oceanside (the City) is pleased to see the elimination of the water surcharge fee, previously considered as a mechanism for funding low income water rate assistance through local agency water bills. While the City remains steadfast in opposition of any mechanism that would involve local water agency billing, we support the three methods currently outlined in Update 2018.

2. Water Surcharge Fee

   In regard to the various proposals that have been suggested for imposing a water use surcharge on local agency water bills, none are without significant drawbacks. Without a direct nexus to cost of service, agencies risk not only political and legal challenges, but also the trust and confidence of their customers and council members to whom they are accountable. Of even greater concern is the risk to an agency’s ability to project and to develop rate structures sufficient to meet the operational, financial, and future growth requirements.
Specific Comments

3. ES-1, ¶ 4

As an agency whose proactive plans and investments in the development of local, alternative water supplies have shown marked resilience, the City of Oceanside recommends a more accurate assessment of the efforts that have been made throughout communities statewide.

4. P 1-8, ¶ 8

The assertion that capital expenditures continue to be largely a reactionary measure to emergencies and extreme events is both inaccurate and uninformed. The City of Oceanside, along with many of the Southern California agencies, has long been proactive in capital planning, maintaining infrastructure, investing in and developing alternative, drought resilient water supplies. We ask that Update 2018 correct this inaccuracy and give the appropriate recognition for all those agencies to whom this generalization does not apply.

Thank you again for providing us the opportunity to provide input on this Public Review Draft of the Water Plan Update 2018 and for consideration of our suggestions and recommendations.

Sincerely,

Cari Dale
Water Utilities Director
City of Oceanside