



18480 Bandilier Circle  
 Fountain Valley, CA 92708  
 714.962.2411  
 www.ocsan.gov

March 11, 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  
 Orange County Sanitation District – Notice of Support**

Dear Assembly Member Ward,

On behalf of the Orange County Sanitation District, I am writing to express our strong support for AB 2180, the Proposition 218 Omnibus Implementation Act. As a public agency providing regional wastewater collection and treatment services, we value clear statutory guidance that promotes transparency and fairness in establishing property-related service charges.

AB 2180 clarifies how local governments may demonstrate compliance with the constitutional requirement that fees not exceed the proportional cost of service. The bill allows agencies to use any reasonable method to allocate service costs among parcels, supported by existing or reasonably estimated data. Importantly, it confirms that agencies are not required to calculate exact parcel-by-parcel costs and may instead impose uniform or tiered fees for customer classes defined by characteristics such as land use, parcel improvements, or peak demand.

These clarifications are essential for sanitation districts that operate complex regional wastewater systems. By recognizing reasonable cost allocation methods and tiered rate structures, AB 2180 preserves constitutional safeguards while giving agencies the flexibility to design equitable, transparent, and financially sustainable rates that reflect the true cost of service.

*Serving:*

- Anaheim
- Brea
- Buena Park
- Cypress
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Los Alamitos
- Newport Beach
- Orange
- Placentia
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District



Page Two

For these reasons, the Orange County Sanitation District supports AB 2180 (Ward). If you have any questions, please contact Jennifer Cabral, Director of Communications, at (714) 593-7581 or via email at [JCabral@ocsan.gov](mailto:JCabral@ocsan.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "R. P. Gallagher", with a long, sweeping flourish at the end.

Ryan P. Gallagher  
Board Chairman