

**From:**  
**To:** [Assembly Natural Resources](#)  
**Subject:** AB220  
**Date:** Monday, March 13, 2023 3:57:08 PM

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Dear Ladies and Gentlemen:

I am writing to express my concern and thereby opposition to AB220.

To avoid any misunderstanding, I am very concerned and in agreement with appropriate water conservation and appropriate water restriction. In fact, in our personal case, we have reduced our water consumption by 30% from two years ago to last year and an additional 30% from January 2022 to January 2023. My issue, therefore, is with the specifics of the proposed legislation allowing unlimited and unapproved authority to the Southern Nevada Water Authority (SNWA) as well as the Las Vegas Valley Water District (LVVWD).

I do not believe that a government agency, or its surrogate, the SNWA or the LVVWD, should be given the authority to impose heavy restrictions or fee increments without very specific legislative approval and without very significant protective options for citizens. Otherwise, this would seem to me to be analogous to allowing the IRS to adjust the various tax rates based on their interpretation of the interest rate or the economic circumstances without specific congressional approval. This is a very fundamental issue wherein the citizens must be protected from governmental controlled agencies by the legislature.

A second issue in my opinion, is that these agencies must provide mechanisms for appropriate responses and considerations to individual appeals or circumstances, an option not appropriately or fairly provided by the LVVWD.

An older single family residence with more than one parcel or more than one house on a single property is to be charged substantially more by the LVVWD as its usage may be more than one parcel, and the LVVWD is unwilling to bill the established separate addresses in the former situation as separate addresses.

As a specific example some preexisting residences dating back 40-50 years are composed of 2-3 parcels or street addresses even if owned or occupied by one family or individual, because their monthly LVVWD water invoices go to one address. They are considered the same as a one parcel residence, even if they are owned and occupied by one citizen. The current legislation reportedly indicates that the water authority could limit residential water usage "per home", but the LVVWD has refused to consider water usage per parcel or separate address or where only one of multiple parcels is billed for multiple parcels owned and occupied by only one family. Thus, more specifically, although the total water usage for three parcels in one home site may be less than each home or parcel separately, such properties would be subjected to very high fees without any consideration by the LVVWD or non-legal option for the respective owners.

I do not believe that government agencies should be allowed to impart fees etc. without any restrictions or limits provided by its respective legislative body, and also without any allowable or reasonable recourse by its citizens.

I agree completely that we all need to reduce or limit our water usage, however perhaps there should also be a distinction on long standing versus newer residential properties. I believe it is a major problem to allow such agencies to limit or charge whatever they choose without legislative control and a meaningful appeal process.

The current AB220 needs to be carefully considered or rejected without appropriate protections.

Thank you for your consideration.

Gary L. Kantor, M. D.