

## commentletters

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**From:** sdcwa@sdca.org on behalf of San Diego County Water Authority  
<sdca@sdca.org>  
**Sent:** Tuesday, December 01, 2015 2:48 PM  
**To:** commentletters  
**Subject:** Comment Letter - Urban Water Conservation Workshop



Submitted on Tuesday, December 1, 2015 - 2:47pm Submitted values are:

First Name: Donald  
Last Name: Billings  
Email: [dfbillings@gmail.com](mailto:dfbillings@gmail.com)  
Today's Date: December 1, 2015  
Comments:

Thank you for the opportunity to comment on the Emergency Regulations for Statewide Urban Water Conservation. It is critical that drought-resistant and sustainable water supplies ratepayers have invested in deliver their water reliability benefits during drought conditions to support California's economy and quality of life.

I urge the State Board to adopt the modifications to the existing emergency regulation to allow water agencies to achieve state water-use targets through a combination of conservation and sustainable drinking water supplies, such as desalination, potable reuse, and long-term transfers of conserved water.

The State Board has a unique opportunity to incentivize the development of sustainable water supplies -- not only for this drought -- but to better prepare California for future droughts.

Please understand that this is not a trivial matter for San Diego, and your actions will directly affect the economics of, and political will necessary to support, critical infrastructure improvements that must be made to sustain California's economy and quality of life. As it stands, your initial rules have been blunt and punitive, discouraged investments in sustainable supply, and burdened this County's citizens with an unnecessary half billion dollars of rate rises, while failing to rationally engage our community and recognize that we have already secured reliable supplies today and for the foreseeable future.

As a local community leader, and former chair of the City of San Diego's Independent Rates Oversight Committee, I have a duty to speak clearly and forcefully in defense of my fellow citizens, who deserve better than the crude rules you have imposed on us to date. Our water leaders have a duty to the ratepayers to revisit their "emergency" ordinances, which today are based NOT on a finding of shortage (because there is none), but on the legally-weak case that we must cut simply because the Governor declared an emergency where none exists. You should know also that many ratepayers are considering bringing class action lawsuits against their local water retailers for damages resulting from these dubious ordinances. As phased rate increases - largely driven by the Governor's whim - begin to bite in coming months, and as property damage becomes more apparent and fire hazard increases, the citizens will rise.

In the event that the Governor fails to revisit his ill-conceived and arguably illegal and fact-free executive order (a declaration of an emergency even where demonstrably there is none), it is left to you to revisit your "emergency" rules to bring a measure of rationality to water planning.

Don Billings  
Solana Beach, CA