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July 28, 2021

Hope Sullivan  
Planning Manager  
Growth Management Commission  
City of Carson City  
Planning and Community Development  
108 East Proctor Street  
Carson City, NV 89701

Via Email and Hand Delivery  
hsullivan@carson.org  
planning@carson.org

Re: GM-2021-0131; 3390 S. Carson Street, APN 009-111-28

Dear Ms. Sullivan and Members of the Growth Management Commission:

This law firm has been retained by Raceway Car Wash Company (“Raceway”), the owner and operator of Sierra Car Wash located at 3130 S. Carson Street. Raceway is respectfully requesting that the Growth Management Commission (“GMC”) deny the request to utilize more than 15,000 gallons of water per day for the operation of a drive-through car wash at 3390 S. Carson St.

Initially, I would like to thank you for your consideration of this objection on such short notice. Unfortunately, Raceway did not receive any notice of this pending action and only learned of the request yesterday, July 27, 2021.

Raceway operates 37 car washes in the western United States and has continuously operated the Sierra Car Wash on S. Carson St. for more than six years. During that time, the Sierra Car Wash has never, on average, utilized more than 11,000 gallons of water per day over any single month. Specifically, in June of this year, Sierra Car Wash washed 11,700 cars and utilized an average of 26 gallons per car. This is an average water use of only 10,400 gallons per day during what was Sierra Car Wash’s busiest month in the past six years.

Raceway does not wish to discourage healthy and fair competition which is ultimately good for consumers in Carson City. Raceway does, however object to the reckless use of our region’s most precious natural resource. The successful operation of Sierra Car Wash for the last six years, only a few hundred yards from the above-referenced location, makes it clear that a car wash can be operated in Carson City without utilizing more than three times the amount of water that this Commission has deemed appropriate for commercial and industrial projects in Carson City.

I know it is not necessary to educate you on the severity of the ongoing drought in the western United States, generally, and northern Nevada, specifically, but according to the National Integrated Drought Information System ([drought.gov](http://drought.gov)) Carson City (and 78.3% of

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Nevada) is currently in a D3- Extreme Drought with no end in sight. (<https://www.drought.gov/states/nevada>). The current drought conditions require all of us to be very cautious about our use of water. It is not the time to be approving uses of more than three times the amount of water that has been deemed appropriate by this very Commission. This is particularly true, when Sierra Car Wash has clearly demonstrated that a car wash can be effectively operated in Carson City while staying within the water use constraints that have been thoughtfully established by you.

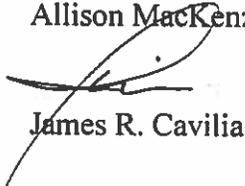
In order to protect the precious and finite water resources of our region and to ensure a level playing field with other businesses in Carson City, the request to use 46,000 gallons of water per day at the above-referenced location should be denied.

Thank you again for your careful consideration of this very important issue. As you are all aware, the protection of and prudent use of our limited water resources is paramount to the ongoing success of our city and our region.

Please feel free to contact me with any questions or comments.

Very truly yours,

Allison MacKenzie, Ltd.



James R. Cavilia

JRC/sp

cc: Raceway Car Wash Company