



STAFF REPORT

Report To: Board of Supervisors **Meeting Date:** November 18, 2021

Staff Contact: Hope Sullivan

Agenda Title: For Possible Action: Discussion and possible action regarding two appeals of the Growth Management Commission's decision to allow for a daily water usage of 29,500 gallons per day for a proposed drive-through carwash on property zoned Retail Commercial, located at 3390 South Carson Street, APN 009-111-28. (Hope Sullivan, hsullivan@carson.org)

Staff Summary: At its meeting of September 29, 2021, the Growth Management Commission voted to allow for a daily water usage of 29,500 gallons per day ("gpd") for a proposed drive-through carwash subject to conditions of approval. Appeals were of the decision to the Board of Supervisors ("Board") were received from Capitol Carwash, LLC, the applicant, and from Raceway Car Wash Company in accordance with Section 18.02.060 (Appeals) of the Carson City Municipal Code ("CCMC"). Capitol Carwash, LLC appealed the decision to preserve its rights. The Board of Supervisors may affirm, modify, or reverse the decision of the Planning Commission.

Agenda Action: Formal Action / Motion **Time Requested:** 60 Minutes

Proposed Motion

I move to uphold the Growth Management Commission's decision.

Board's Strategic Goal

Sustainable Infrastructure

Previous Action

December 15, 2020 - Project Major Project Review

April 15, 2021 - Applicant applies for growth management approval

May 26, 2021 - Application removed from Growth Management Commission agenda at applicant's request

July 28, 2021 - Staff removes application from Growth Management Commission agenda due to clerical error

August 25, 2021 - Application for 46,000 gpd considered by the Growth Management Commission and continued at the request of the applicant.

September 29, 2021 - Application for 29,500 gpd approved by the Growth Management Commission subject to conditions of approval by a vote of 3 – 2, 2 absent.

October 8, 2021 - Appeal received from Michael W. Cabrera, ESQ on behalf of Capitol Carwash, LLC. Of note, this appeal is intended to preserve the Applicant's right to any necessary further appeals pursuant to NRS 278.3195 or any other applicable code, regulation or statute.

October 8, 2021 - Appeal received from James R. Cavilia, ESQ on behalf of Raceway Car Wash Company.

Background/Issues & Analysis

Per CCMC 18.12.070 the Board will determine, annually, the maximum daily water usage threshold for commercial and industrial building permits. In the event a commercial or industrial use exceeds the amount set by the Board, the applicant must apply for review and approval by the Growth Management Commission. The Growth Management Commission may approve, approve with conditions, or deny on the basis of the effect of the project on the city's essential resources. The Growth Management Commission must base its decision on the following:

- (1) Quantity of water consumed by the use for which the building is constructed compared to the availability of water;
- (2) Ability of the city to deliver water service to the structure;
- (3) Other effects of water usage;
- (4) Ability of the city's sewage disposal system to handle the quantity of wastewater generated, including the composition of the wastewater;
- (5) Ability of the City's sewer system to carry the wastewater for treatment; and
- (6) Other effects of wastewater disposal.

The current established threshold for average daily water usage for commercial and industrial projects is 15,000 gallons of water per day.

At its meeting on September 29, 2021, the Growth Management Commission voted to approve the request for 29,500 gpd subject to conditions of approval. The vote was 3 – 2, 2 absent.

Per CCMC 18.02.060, any decision of the Growth Management Commission may be appealed to the Board of Supervisors. The board may affirm, modify or reverse the decision.

The following documents are attached to provide the complete record.

1. Letter of Appeal dated October 7, 2021 with attachments from Michael W. Cabrera, Lewis Roca.
2. Letter of Appeal dated October 8, 2021 from James R. Cavilia, Allison MacKenzie
3. Executed Notice of Decision.
4. Growth Management Commission staff report of September 29, 2021 with attachments.
5. Approved Growth Management Commission September 29, 2021 meeting minutes.

Applicable Statute, Code, Policy, Rule or Regulation

CCMC 18.02.060 (Appeals), and Chapter 18.12 (Growth Management)

Financial Information

Is there a fiscal impact? No

If yes, account name/number:

Is it currently budgeted? No

Explanation of Fiscal Impact:

Alternatives

1. Reverse the Growth Management Commission's decision so as to not allow the use of 29,500 gallons of water per day.

2. Modify the Growth Management Commission's decision by amending the conditions of approval or providing other direction.

Attachments:

[Appeal - Lewis Roca.pdf](#)

[Appeal - Allison McKenzie \(Full packet\) .pdf](#)

[Signed NOD - GM 2021-0131.pdf](#)

[09.29 GM - Staff Report and Attachements.pdf](#)

[09-29-2021 Minutes \(GM\).pdf](#)

Board Action Taken:

Motion: _____

1) _____

2) _____

Aye/Nay

(Vote Recorded By)

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One East Liberty Street
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Reno, NV 89501-2128
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Michael W. Cabrera
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GGordon@lewisroca.com
MCabrera@lewisroca.com

LEWIS  ROCA



Our File Number: 307692.00001

October 7, 2021

VIA E-MAIL

Mayor Lori Bagwell & Honorable Supervisors
c/o Hope Sullivan
Community Development Director
108 East Procter Street
Carson City, Nevada 89701

RE: Appeal of Growth Management Commission - Approval for 3390 S. Carson Street (File # GM-2021-0131)

Dear Mayor Bagwell and Honorable Board of Supervisors Members:

This office represents Capitol Carwash, LLC, a Nevada limited liability company, the applicant in the above-referenced matter (the "Applicant"). The Applicant is proposing a state-of-the-art car wash facility ("Metro Carwash") at the property located at 3390 S. Carson Street (the "Property"). On September 29, 2021, the Growth Management Commission ("GMC") held a public hearing on the application and approved GM-2021-0131. Although the Applicant agrees with the GMC approval, it nonetheless files this appeal of the favorable decision in order to preserve its future rights to judicial review. See NRS 278.3195(4). Carson City Municipal Code ("CCMC") § 18.02.060(2) provides that "[a]ny decision of the commission, [...] may be appealed to the board by the applicant, any aggrieved party, or any member of the board by following the procedures in subsection 4 of this section within 10 days of the date of the decision." Accordingly, the purpose of this timely appeal is to preserve the Applicant's right to any necessary further appeals pursuant to NRS 278.3195 or any other applicable code, regulation, or statute. This letter sets forth the legal framework for an appeal from a favorable decision of the Growth Management Commission to the Board of Supervisors.

The Nevada Supreme Court has consistently held that judicial review of land use actions may only be preserved when the prevailing party at the lower body level has appealed such favorable decision to the applicable governing body. The statutory language states, as follows:

Any person who:

- (a) Has appealed a decision to the governing body in accordance with an ordinance adopted pursuant to [NRS 278.3195(1)]; and
- (b) Is aggrieved by the decision of the governing body, may appeal that decision to the district court of the proper county by filing a petition for judicial review within 25 days after the date of filing of notice of the decision with the clerk or secretary of the governing body, as set forth in NRS 278.0235.

NRS 278.3195(4). The Court has examined this statute and determined that:

NRS 278.3195(4) is clear and unambiguous, and thus, we follow its plain meaning. A party who has administratively appealed to the [governing body], under the local ordinance, may challenge the [governing body's] decision "by filing a [timely] petition for judicial review."

Kay v. Nunez, 122 Nev. 1100, 1104, 146 P.3d 801, 804-05 (2006) (quoting NRS 278.3195(4); quotation marks in original).

Although statutory and common law in Nevada typically require an appellant to be aggrieved by a decision, the Nevada Supreme Court has explained that the Legislature created additional authority and a *requirement* for parties to appeal favorable land use decisions to the governing body in order to preserve their rights to judicial review. See *Kay*, 122 Nev. at 1106, 146 P.3d at 805-06; *Humboldt River Ranch Ass'n v. Pershing County Bd. Of Com'rs*, 128 Nev. 904, 381 P.3d 622 (2012) (unpublished). In other words, if an applicant has not appealed a favorable decision from the Carson City GMC to the Board of Supervisors, the applicant would not have standing to appeal an adverse Board of Supervisors decision to district court. See *Kay*, 122 Nev. at 1106, 146 P.3d at 805-06. The Court explained that:

the Legislature has substituted its own definition of "aggrieved" for purposes of local zoning and land use planning decisions" . . . NRS 278.3195(4) governs a party's standing to challenge the Board's decision in the district court; it provides that a person who has appealed an administrative decision to the Board under the local ordinance and is aggrieved by the Board's decision may file a petition for judicial review in the district court.

Id.

Further review by the Court of NRS 278.3195(4) indicates that the prevailing party in initial municipal decisions, such as from the GMC, are authorized *and required* to file such appeals to preserve standing for judicial review. See *Holt-Still v. Washoe County Board of County Commissioners*, 466 P.3d 937, 2020 WL 3570377 (2020) (unpublished) ("Had the Legislature meant to extend standing to a party who won at the planning-commission level and so did not appeal to the governing body, it would not have included a separate subsection expressly requiring a petitioner to "[h]a[ve] appealed" to the governing body."); *Humboldt River Ranch Ass'n*, 128 Nev. 904, 381 P.3d 622.

In *Humboldt River Ranch Ass'n*, the petitioner ("HRRA") sought judicial review of an adverse zoning decision by the Pershing County Board of County Commissioners ("Pershing County BCC"). Because the Pershing County Planning Commission's decision was favorable to the position taken by HRRA, it did not appeal the Planning Commission's decision to the Pershing County BCC. After the Pershing County BCC reversed the Planning Commission's decision, HRRA sought a petition for judicial review. The district court dismissed the petition for a lack of standing, which dismissal was upheld by the Nevada Supreme Court. The Supreme Court explained:

Pursuant to NRS 278.3195(4), a petition for judicial review can only be filed with the district court by a person who administratively appeals a zoning decision under the applicable ordinance to the governing board and is aggrieved by the board's decision. We recognize that the decision of the Planning Commission was favorable to the position taken by HRRA, however, based on the plain language of NRS 278.3195(4)'s limiting criteria, HRRA was required to file an appeal within the local zoning process in order to pursue a petition for judicial review. See *Kay*, 122 Nev. at 1104, 146 P.3d at 805 (stating that "NRS 278.3195(4) is clear and unambiguous, and thus, we follow its plain meaning"). HRRA did not file such an appeal before filing its petition for judicial review, and we therefore conclude that the district court did not err in dismissing HRRA's petition.

128 Nev. 904, 381 P.3d 622.

Thus, the Applicant here is required to appeal the favorable decision of the GMC in order to preserve its right to judicial review in the event of further appeals. During the hearing before the Board of Supervisors on this appeal, the Applicant will therefore request that this honorable body affirm the GMC decision, and deny any adverse appeal.

Sincerely,

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Michael W. Cabrera

Garrett D. Gordon
Michael W. Cabrera

MWC/ctb

KAREN A. PETERSON
JAMES R. CAVILIA
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(1932-1997)

RECEIVED

OCT 08 2021

CARSON CITY
PLANNING DIVISION

October 8, 2021

Hope Sullivan
Planning Manager
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: Notice of Appeal
GM-2021-0131; 3390 S. Carson Street, APN 009-111-28

Dear Hope:

As you know this law firm represents Raceway Car Wash Company ("Raceway"), the owner and operator of Sierra Car Wash located at 3130 S. Carson Street. Please accept this correspondence as a formal appeal of Growth Management Commission's September 29, 2021 three to two decision to approve a 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.

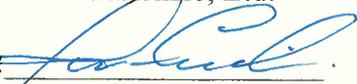
As stated in our previous correspondence and explained during the Growth Management Commission Meetings, Raceway contends that allocation of nearly twice the allotted amount of water for a commercial use to a drive-through car wash is an inappropriate use of Carson City's limited water resources. Allocation of this additional amount of water for the proposed use will make this approximately 16.5 acre-feet of water permanently unavailable for any other possible use in Carson City.

Thank you for your work on this matter on behalf of the citizens of Carson City. We look forward to the Board of Supervisors' consideration of this appeal at an upcoming meeting. Please notify us of the date of such meeting at your earliest convenience.

Of course, if you have any questions about this appeal, do not hesitate to contact me.

Very truly yours,

Allison MacKenzie, Ltd.

By: 
JAMES R. CAVILIA, ESQ.

JRC/sp

KAREN A. PETERSON
 JAMES R. CAVILIA
 CHRIS MACKENZIE
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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) Carson City (and 78.3% of

Correspondence re GM-2021-0131

July 28, 2021

Page 2 of 2

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.

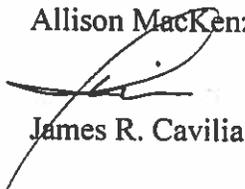
In order to protect the precious and finite water resources of our region and to ensure a level playing field with other businesses in Carson City, the request to use 46,000 gallons of water per day at the above-referenced location should be denied.

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

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September 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:

As you may know this law firm represents Raceway Car Wash Company (“Raceway”), the owner and operator of Sierra Car Wash located at 3130 S. Carson Street. Raceway is once again 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.

As stated in our earlier correspondence, 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 (“gpd”) during what was Sierra Car Wash’s busiest month in the past six years.

It appears the applicant in this matter, Metro Car Wash, has reduced its request for daily water usage from 46,000 gpd to 29,500 gpd. This amount of 29,500 gpd is still nearly double the maximum daily water usage threshold for commercial and industrial uses of 15,000 gpd as set by the Board of Supervisors. As you recall, after hours of discussion about this planned carwash and whether or not this was an appropriate use of Carson City’s very limited water resources, the matter was continued.

As the operator of an existing car wash also located on the west side of Carson Street only 200± yards north of this new proposed car wash, Raceway is very concerned about the impact of drawing an additional 29,500 gallons per day from the existing water delivery infrastructure. In recent months, at times of high volume at Sierra Car Wash, there has been a lack of adequate water pressure to supply sufficient water to the system. In this regard, Sierra Car Wash has recently

Correspondence re GM-2021-0131
September 28, 2021
Page 2 of 3

installed its own equipment to ensure the adequate flow of water.¹ Adding a user of nearly twice the maximum daily usage that will be served by the same supply line will undoubtedly have a negative effect on other users in the vicinity.

With regard to the amount of water being requested by this applicant, it cannot be emphasized enough that the City's own analysis of three similar businesses in Carson City shows an average daily use of 9,336 gpd and upper daily use of 14,904 gpd. There is simply no justification for this business to utilize twice as much water as other similar operations in Carson City. The City's analysis also shows that this applicant is seeking to utilize approximately 16.5 acre-feet more water annually than is allowed by Carson City's existing ordinance. Based upon the Carson City Municipal Code definition of Water Equivalent Residential Customer, this 16.5 acre-feet is enough water to supply 34 residential units in Carson City. This proposed use of another car wash in Carson City is simply not a sufficient basis to justify the amount of water being requested.

Sierra Car Wash and others have clearly demonstrated that car wash facilities can be effectively and successfully operated in Carson City while staying within the water use constraints that have been thoughtfully established by this Commission and the Board of Supervisors. 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 29,500 gallons of water per day at the above-referenced location should be denied.

In addition to reducing the amount of water being requested since your meeting in August, the applicant is also now offering that if its water demand exceeds the requested 29,500 gpd, the applicant will utilize non-City well water or possibly "license to the City" water rights to exceed 29,500 gpd. This first option of somehow combining or comingling private well water with the City's municipal water being utilized on the property seems very unrealistic.² The Nevada State Engineer would simply not permit a private well to be utilized to supplement the water being provided by an existing municipal water system. Certainly, Carson City should not even consider accepting and imposing such a condition without explicit, written confirmation that this sort of comingling of private well water with a municipality's urban water system would be allowable. To my knowledge this has not been obtained or even sought at this point.

With regard to "licensing" water to the City, which we presume means actually dedicating water rights to Carson City, if the applicant is willing to do this for any amount of usage over 29,500 gpd, it seems logical that the applicant should be required to dedicate water for any amount over 15,000 gpd, the current maximum daily water usage threshold for a commercial use. If this applicant were required to permanently dedicate 16.5 acre-feet of water (the equivalent of approximately 14,500 gpd for one year) to Carson City and assurances exist that the system can effectively deliver the requested water without negatively impacting other users, then the applicant should be permitted to utilize up to 29,500. By placing this requirement on the applicant, the Growth Management Commission would ensure that Carson City retains sufficient water resources to continue to successfully implement Carson City's Growth Management scheme over the life of the plan.

¹ Enclosed is correspondence from the vice-president of maintenance and facilities for Sierra Car Wash describing the water pressure issues being experienced at Sierra Car Wash in Carson City.

² According to the Carson City's Assessor's office, the well located on the subject property was a domestic well established in 1965. It is simply not possible under Nevada water law that a domestic well that has not been utilized in decades could be re-established for the purpose that this applicant is proposing.

Correspondence re GM-2021-0131
September 28, 2021
Page 3 of 3

In evaluating this application, the Growth Management Commission is charged with approving, approving with conditions, or denying this request. As stated in the Staff Report for this matter, that decision must be based on, among other things, “[o]ther effects of water usage.” CCMC 18.12.070. The Staff Report also states that the Growth Management Commission is not to apply the policy established by the Board of Supervisors in Resolution 2021-R-23 adopted on July 15, 2021. As you know that policy provides you with some specific guidance in considering these requests to utilize excess water, like whether “the use will promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation or tourism.” Although, as the Staff Report states that this policy is not explicitly applicable to the current application because of the timing of the application, I would suggest that the language of the policy is appropriate to consider in determining the “other effects” of this water usage.

Simply put, Carson City does not have “extra” water resources. It has an established finite amount of water available. The Board of Supervisors, over the past generation, has established a growth management plan, in large part, to protect that finite resource. As the Growth Management Commission, it is your job to make policy decisions about how that resource should be utilized generally. And specifically, you are to determine whether requests to utilize more than the accepted or normal amount of water should be granted based upon the value of that proposed use to our community as a whole.

Based upon the information in this correspondence, I would respectfully submit that the establishment of a car wash on South Carson Street does not justify the use of nearly twice the amount of water used by any similar operation in Carson City. A new “state of the art” car wash is not a sufficient reason to permanently allocate approximately 16.5 acre-feet of water that could be used for another business or up to 24 residential units in Carson City. If Carson City did have “extra” water, this would not be a sensible use of that water. On this basis, the current application should be denied.

Thank you 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 remains 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.

By: 
JAMES R. CAVILIA, ESQ.

JRC/sp
Encl.

cc: Raceway Car Wash Company
4815-8206-4381, v. 1



To Whom it May Concern:

September 27, 2021

At times Sierra Car Wash located at 3130 S Carson Street suffers from lack of water pressure supplied to the site through the municipal water system. This phenomenon seems to happen during intervals when there seems to be high demand on the water system caused by local use, including the car wash. The typical hours that the wash is affected by low water pressure are between 10am - 4pm. It's not uncommon to see water pressure drop below 10 psi as measured with local gauges.

During these intervals of low water pressure, the car wash is affected in several ways. The most prominent way the wash is affected is in the soap, detergents, and wax applications delivered in the car wash tunnel. Without sufficient water pressure supplied to the site, the mixing stations cannot properly dilute these products, thus the performance of car wash cleaning process is severely diminished.

These issues caused by low water pressure have caused a strain on the business in terms of customer complaints, equipment service and replacement costs as well as service costs associated with the cleaning of clogged drains.

In recent months, because of this low pressure, the car wash has made capital improvements to increase the water pressure at the site and to enhance the delivery process of the cleaning products. These improvements have been necessitated by the poor incoming water pressure. Eight of the other regional Sierra Car Wash locations have not needed these improvements because they are supplied with sufficient water pressure to properly run the operations.

Sincerely,

A handwritten signature in blue ink, appearing to read "JP Perrault", is written over a light blue horizontal line.

Josh Perrault

VP Maintenance and Facilities – Raceway Car Wash Company

2398 E Camelback Road Ste 615, Phoenix, AZ 85016



Carson City Planning Division

108 E. Proctor St.

Carson City, Nevada 89701

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Growth Management Commission
September 29, 2021

NOTICE OF DECISION – GM-2021-0131

An application was received regarding a request for a request for a Growth Management approval to allow for a daily water usage of 29,500 gallons per day for a proposed drive-through carwash on property zoned Retail Commercial (“RC”), located at 3390 S. Carson Street, APN 009-111-28.

The Growth Management Commission reviewed the application on September 29, 2021, in conformance with City and State legal requirements and approved GM-2021-0131 based on the findings contained in the staff report and subject to the following conditions of approval.

CONDITIONS OF APPROVAL:

1. The applicant must sign and return the Notice of Decision within 10 days of receipt of notification. If the Notice of Decision is not signed and returned within 10 days, the item may be rescheduled for the next Growth Management Commission meeting for further consideration.
2. At the time of building permit, an analysis must be provided to validate the estimated peak flow being drawn from the City water system. The peak flow being drawn will be used for determining the water connection fee, which will be calculated as maximum day gallons per minute (“gpm”), as specified in the Carson City Connection Fee Rate Schedule. The calculated maximum peak flow rate will be limited to 90 gpm to the property, for any average 15-minute period, unless the applicant provides improvements to the City’s water system which are shown by an engineering analysis to increase the available flow, or the applicant connects to another water line that can provide more than 90 gpm, subject to approval by the City Engineer. If the applicant connects the property to another water line that can provide more than 90 gpm, then the allowable peak flow will be adjusted based on the capability of the alternative line as approved by the City Engineer.
3. Each year for five years after commencement of the use, the applicant shall submit to the Growth Management Commission documentation of actual water use in the form of average gallons per day and peak flow for any consecutive 15 minutes. Documented accidental leaks, which have been properly repaired, will not count toward this peak flow. If it is found that the applicant is not in compliance with the Growth Management approval or if the applicant anticipates a need for additional water use beyond the amount approved herein, the applicant shall do one of the following: (a) implement onsite modifications to create compliance; (b) apply for a new growth management approval from the Growth Management Commission; (c) license water rights to Carson City in an amount equal to any amount of water used or anticipated to be used in excess of this entitlement; or (d) offset any excess amount by use of well water, as permitted by the Nevada Division of Water and the City Engineer. In reviewing any new growth management application, the Commission may require additional conditions of approval. For any of the above options,

if the peak flow drawn from the City system is increased to above 90 gpm, the applicant must pay additional connection fees. If physical improvements are deemed necessary, the City will be allowed to install equipment, or require the applicant to install equipment, which will limit the flow to the approved peak flow.

- 4. Connection fees will be based on the allocated usage approved by this growth management application.
- 5. This approval does not constitute an approval of the site plan. The Growth Management Commission is reviewing water use and not the site plan. The approval is for average gallon per day water use and the estimated peak flow rate as determined by an engineering analysis of the equipment to be installed instead of using the average estimated flow with a peaking factor of 3.
- 6. The use must be established on the site within two years of this approval. If the use is not established on the site within two years, the approval will expire, and a new request must be submitted.
- 7. As part of the building permit, the applicant must provide a written determination from the Nevada Division of Water Resources, stating under what circumstances, if any, the well may remain in use, and/or if the well needs to be plugged per the requirements of NAC 534, including but not limited to NAC 534.427. In the event that the well is to remain in use, the city's water system and the Eagle Valley Aquifer must be protected to the satisfaction of the City Engineer.
- 8. This request is approved based on a representation of water conservation in operations, because of this, the authorization to utilize 29,500 is not transferable. Any change of use will be limited to the threshold if effect at that time unless a larger water use is authorized by the growth management commission.

This decision was made on a vote of 3 ayes, 2 nays, 2 absent.



 Hope Sullivan, AICP
 Community Development Director

Emailed on: Thursday, September 30, 2021

By: _____

PLEASE SIGN AND RETURN THIS NOTICE OF DECISION WITHIN TEN DAYS OF RECEIPT

This is to acknowledge that I have read and will comply with the Conditions of Approval as approved by the Carson City Planning Commission.



 OWNER/APPLICANT SIGNATURE

10/2/2021

 DATE

Ernie Ionno

PLEASE PRINT YOUR NAME HERE

RETURN VIA:

Email to: coverlay@carson.org

Fax to: (775) 887-2278

Mail to: Carson City Planning Division
108 E. Proctor St.
Carson City, NV 89701

★ CLERK ★
FILED
Time 1:27PM

OCT 01 2021

By Mariah Davis
Deputy
Carson City, Nevada

**STAFF REPORT FOR GROWTH MANAGEMENT COMMISSION
MEETING SEPTEMBER 29, 2021**

FILE NO: GM-2021-0131

AGENDA ITEM: 6A

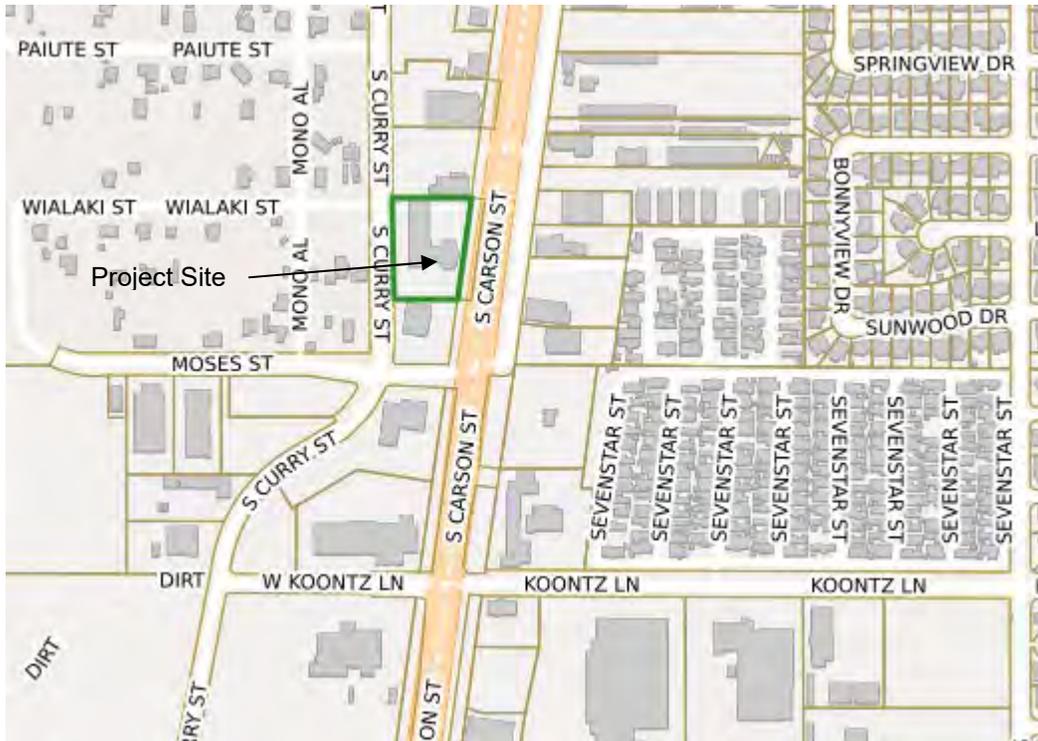
STAFF CONTACT: Hope Sullivan, Community Development Director

REQUEST: For Possible Action: Discussion and possible action regarding a request for a Growth Management approval to allow for a daily water usage of 29,500 gallons per day for a proposed drive-through carwash on property zoned Retail Commercial (“RC”), located at 3390 S. Carson Street, APN 009-111-28. (Hope Sullivan, hsullivan@carson.org)

STAFF SUMMARY: The applicant is proposing a drive-through carwash and requesting an average water usage of 29,500 gallons per day. Growth Management review and approval is required for any commercial use that uses more than 15,000 gallons of water per day.

RECOMMENDED MOTION: I move to approve GM-2021-0131 based on the review criteria in place at the time of application.

LOCATION:



RECOMMENDED CONDITIONS OF APPROVAL:

1. The applicant must sign and return the Notice of Decision within 10 days of receipt of notification. If the Notice of Decision is not signed and returned within 10 days, the item may be rescheduled for the next Growth Management Commission meeting for further consideration.
2. At the time of building permit, an analysis must be provided to validate the estimated peak flow being drawn from the City water system. The peak flow being drawn will be used for determining the water connection fee, which will be calculated as maximum day gallons per minute ("gpm"), as specified in the Carson City Connection Fee Rate Schedule. The calculated maximum peak flow rate will be limited to 90 gpm to the property, for any average 15-minute period, unless the applicant provides improvements to the City's water system which are shown by an engineering analysis to increase the available flow, or the applicant connects to another water line that can provide more than 90 gpm, subject to approval by the City Engineer. If the applicant connects the property to another water line that can provide more than 90 gpm, then the allowable peak flow will be adjusted based on the capability of the alternative line as approved by the City Engineer.
3. Each year for five years after commencement of the use, the applicant shall submit to the Growth Management Commission documentation of actual water use in the form of average gallons per day and peak flow for any consecutive 15 minutes. Documented accidental leaks, which have been properly repaired, will not count toward this peak flow. If it is found that the applicant is not in compliance with the Growth Management approval or if the applicant anticipates a need for additional water use beyond the amount approved herein, the applicant shall do one of the following: (a) implement onsite modifications to create compliance; (b) apply for a new growth management approval from the Growth Management Commission; (c) license water rights to Carson City in an amount equal to any amount of water used or anticipated to be used in excess of this entitlement; or (d) offset any excess amount by use of well water, as permitted by the Nevada Division of Water and the City Engineer. In reviewing any new growth management application, the Commission may require additional conditions of approval. For any of the above options, if the peak flow drawn from the City system is increased to above 90 gpm, the applicant must pay additional connection fees. If physical improvements are deemed necessary, the City will be allowed to install equipment, or require the applicant to install equipment, which will limit the flow to the approved peak flow.
4. Connection fees will be based on the allocated usage approved by this growth management application.
5. This approval does not constitute an approval of the site plan. The Growth Management Commission is reviewing water use and not the site plan. The approval is for average gallon per day water use and the estimated peak flow rate as determined by an engineering analysis of the equipment to be installed instead of using the average estimated flow with a peaking factor of 3.
6. The use must be established on the site within two year of this approval. If the use is not established on the site within two years, the approval will expire, and a new request must be submitted.
7. As part of the building permit, the applicant must provide a written determination from the Nevada Division of Water Resources, stating under what circumstances, if any, the well

may remain in use, and/or if the well needs to be plugged per the requirements of NAC 534, including but not limited to NAC 534.427. In the event that the well is to remain in use, the city's water system and the Eagle Valley Aquifer must be protected to the satisfaction of the City Engineer.

LEGAL REQUIREMENTS: CCMC 18.12.070 (Growth Management, Commercial and Industrial Permits)

MASTER PLAN DESIGNATION: Mixed Use Commercial

ZONING DISTRICT: Retail Commercial

DISCUSSION: Per Carson City Municipal Code 18.12.070 the Board of Supervisors will determine, annually, the maximum daily water usage threshold for commercial and industrial building permits. In the event a commercial or industrial use exceeds the amount set by the Board, the applicant must apply for review and approval by the Growth Management Commission. The Commission may approve, approve with conditions, or deny on the basis of the effect of the project on the city's essential resources. The Commission must base its decision on the following:

- (1) Quantity of water consumed by the use for which the building is constructed compared to the availability of water;
- (2) Ability of the city to deliver water service to the structure;
- (3) Other effects of water usage;
- (4) Ability of the city's sewage disposal system to handle the quantity of wastewater generated, including the composition of the wastewater;
- (5) Ability of the City's sewer system to carry the wastewater for treatment; and
- (6) Other effects of wastewater disposal.

Quantity of water consumed

Carson City has established a threshold for average daily water usage for commercial and industrial projects of 15,000 gallons of water per day ("gpd"), above which an applicant is required to obtain approval from the Growth Management Commission prior to the issuance of a building permit. The applicant is proposing a car wash and has requested an average daily usage of 29,500 gallons per day.

Of note, the City maintains a water model that utilizes the Master Plan designations on a parcel basis to determine the overall water demand in the City. This helps the City to understand water demand at build out. In the analysis, the subject property did not have any existing water usage. This would typically indicate a vacant parcel. In this case, it was likely because the business was utilizing an on-site well or had been closed for a period of time. In the buildout forecast model, based on a Master Plan designation of Mixed Use Commercial, the model anticipated a water demand of 4,800 to 5,800 gallons per day.

Engineering staff has provided comparison data which shows that the request is significantly greater than the actual use by similar land uses in Carson City, and that the request is the equivalent of 69.4 Water Equivalent Residential Customers. The comparison data identifies three similar businesses in the City with a low water usage of 1,682 gpd and a high of 14,904 gpd.

Ability of City to Deliver Water

Development Engineering has reviewed the information submitted by the applicant and conferred with Public Works. Staff has determined that the City can adequately supply the requested water from the existing system subject to the conditions of approval in the staff report.

Other Effects of Water Usage

Part of the other effects of water usage includes the opportunity cost. The City's water resources are not infinite. With that in mind, the engineering staff provides the Commission with the water equivalent residential customer value. If water is assigned to Use A, it will not be available to Use B.

Specific policy criteria relative to commercial and industrial water demands has been included in Resolution 2021-R-23 adopted by the Board of Supervisors on July 15, 2021. This criteria states:

"... the Growth Management Commission must first find that the use utilizes water conservation measures and techniques. If that finding is made, the Growth Management Commission must consider if the use will promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation and tourism. If both such findings are made, an application under subsection 5 can be granted."

However, Resolution 2021-R-23 is only applicable to applications for building permit in 2022. The timeline for the subject application has been as follows.

December 15, 2020	Project Major Project Review
April 15, 2021	Applicant applies for growth management approval
May 26, 2021	Application removed from agenda at applicant's request
July 28, 2021	Staff removes application from agenda due to clerical error
August 25, 2021	Application for 46,000 gpd considered by the Commission and continued at the request of the applicant.
September 29, 2021	Application for 29,500 gpd (current application) considered by the Commission.

Given the time table, the criteria in Resolution 2021-R-23 does not apply to this request.

Attachments:

- Water Use Application Form (GM-2021-0131)
- Email from Michael Cabrera, Lewis Roca Rothgerber Christie LLP, dated September 14, 2021
- August 25, 2021 staff report to the Growth Management Commission with attachments and late material.

NEW WATER USE APPLICATION FORM

(Carson City Growth Management Commission)



Water Use Comparison

Type of Business : Conveyor Car Wash

Number of similar businesses found

#

Low: 1,682 (GPD)

Average: 9,336 (GPD)

High: 14,904 (GPD)

Amount Requested GPD

of equivalent WERCs

Water Rights Comparison

Low 1.9 (AC-FT/YR)

Average 10.5 (AC-FT/YR)

High 16.7 (AC-FT/YR)

Amount Requested AC-FT/YR

- Notes**
- 1: Water usage based on 1-year during 2020 calendar year
 - 2: Range of comparative values are for reference only, no warranty is given or implied for typical uses
 - 3: Carson City Municipal Code (CCMC) definition of Water Equivalent Residential Customer (WERC) value of 425/gpd

From: [Cabrera, Michael](#)
To: [Hope Sullivan](#); [Christie Overlay](#)
Cc: [Heather Ferris](#); [Randall Rice](#); [Stephen Pottey](#); [Ernie Ionno](#); [Gordon, Garrett](#); [Mark Wray](#); [Curtis Coulter](#)
Subject: RE: GM-2021-0131 - Application Modifications
Date: Tuesday, September 14, 2021 1:35:10 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image001.png](#)

This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.

Yes, this is our proposal. We will reduce our ask to 29,500 GPD with modifications to the prior version of the conditions of approval as generally outlined below. We marked up the conditions to reflect what we are trying to achieve, but we can be flexible on the exact language. Thus, we provide the conceptual framework to explain our goals if this precise language does not work for staff.

Since we are discussing using a combination of well and city water, we believe Condition #2 needs to change to reflect that only the water being drawn from the City should be considered under the monitoring scheme. We also would like the option to connect to a different water line that could supply a greater flow, which we believe would alleviate staff concerns about water pressure.

Condition #3 is modified to reflect that Metro can utilize different options to achieve reaching its water needs if and when the 29,500 GPD is exceeded.

Michael Cabrera
Associate

MCabrera@lewisroca.com
D. 775.321.3452

LEWIS  ROCA

From: Hope Sullivan <HSullivan@carson.org>
Sent: Tuesday, September 14, 2021 11:31 AM
To: Cabrera, Michael <MCabrera@lewisroca.com>; Christie Overlay <COOverlay@carson.org>
Cc: Heather Ferris <HFerris@carson.org>; Randall Rice <RRice@carson.org>; Stephen Pottey <SPottey@carson.org>; Ernie Ionno <eionno@att.net>; Gordon, Garrett <GGordon@lewisroca.com>; Mark Wray <mwray@markwraylaw.com>; Curtis Coulter <curtis@coulterharshlaw.com>
Subject: RE: GM-2021-0131 - Application Modifications

[EXTERNAL]

Michael:

You are referring to “conceptual amendments.” Can I read this as your proposal to the GMC? I need to know what you are putting forward.

LMK. Thank you.

Hope Sullivan, AICP
Community Development Director
108 E. Proctor Street
Carson City, NV
775-283-7922



From: Cabrera, Michael <MCabrera@lewisroca.com>
Sent: Monday, September 13, 2021 4:14 PM
To: Christie Overlay <COverlay@carson.org>
Cc: Hope Sullivan <HSullivan@carson.org>; Heather Ferris <HFerris@carson.org>; Randall Rice <RRice@carson.org>; Stephen Pottey <SPottey@carson.org>; Ernie Ionno <eionno@att.net>; Gordon, Garrett <GGordon@lewisroca.com>; Mark Wray <mwray@markwraylaw.com>; Curtis Coulter <curtis@coulterharshlaw.com>
Subject: RE: GM-2021-0131 - Application Modifications

This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.

Good Afternoon,

Thank you for continuing to work with us through this process. We are trying to achieve the goal of being able to utilize the water we will actually need, without capping our potential.

We would like to reduce our request to 29,500 average GPD usage. We would also like to further modify the conditions of approval. We provide conceptual amendments to the conditions, as well as a markup of Conditions 2 and 3 for discussion purposes.

Conceptually, this is what we are looking to achieve:

- Reduce our GPD request to average 29,500 GPD
- Condition #3
 - Add option to use well to use non-City water to exceed 29,500 GPD in same amount use or anticipated to use
 - Add option to license to the City any water rights to exceed 29,500 GPD in same amount used or anticipated to use
 - Remove reference to peak flow over 15 minute intervals.

Condition #2

- Change calculation of “peak flow” to “water drawn from the City main”
 - If we draw water from a well or store in a tank, it should not matter how much water we are using in the car wash – the only concern should be with respect to the amount we are pulling from the City.
 - All language regarding car wash equipment flow is irrelevant and should be removed.
- We agree for a period of three years after commencement, we will submit to GMC documentation of actual average daily water usage. Submitting peak amount of water drawn for any consecutive 15 minutes is agreeable, but we do not know how this is done or if it's feasible; can the city advise?
 - if we can determine 15 minute peak draw from the City’s line, and it's found we are not in compliance, we have the option to make onsite modifications or connect to another water main to supply the excess of 90 gpm.
 - The idea is that we are not limiting the site to 90gpm max, we think we can manage the draw from the City’s line without exceeding the consecutive use of 90gpm with tanks, but we have the option to another main if it's needed.
- If we connect to a new water line, makes condition go away
- Connections fees should be calculated like everyone else who applies for water use.
 - $29,500 \text{ daily average gallons} / 1,440 \text{ minutes} = 20.48 \times 3 \text{ peaking factor} = 61.44 \text{ gallons} \times \text{connect fee } \$ \text{ per minute, etc.}$
- Also, we want to install equipment that will remove the air out of water before it's metered, this is important.
- Condition #6
 - Strike the condition, or alternatively, agree that we are to be treated the same as any other user with respect to connection fees, etc.

--

2. At the time of building permit, an analysis must be provided to validate the estimated peak **amount of water being drawn from the water line** ~~flow, including manufacturer specifications for the conveyor system, spray nozzles, lateral size and other mechanical equipment which impacts the peak flow.~~ The peak ~~flow~~ **amount of water drawn from the City** for determining the water connection fee will be calculated as ~~maximum day~~ **average** gallons per minute (gpm), as specified in the Carson City Connection Fee Rate Schedule. The calculated maximum peak ~~flow demand~~ rate will be limited to **average** 90 gpm **to the property** ~~by the equipment installed~~, for any **average** 15-minute period, unless the applicant provides improvements to the City’s water system which are shown by an engineering analysis to increase the available flow, **or the applicant connects to another water line that can provide more than 90 gpm**, subject to approval by the City Engineer. **If the applicant connects the property to another water line that can provide more than 90 gpm, then the provisions of this condition will no longer apply.**

3. Each year for three years after commencement of the use, the applicant shall submit to the Growth Management Commission documentation of actual water use in the form of **average** gallons per day ~~and peak flow for any consecutive 15 minutes~~. Documented accidental leaks, which have

been properly repaired, will not count toward this peak flow. If it is found that the applicant is not in compliance with the Growth Management approval **or anticipates a need for additional water use beyond the amount approved herein, the applicant shall do one of the following: (a) either implement** onsite modifications ~~will need to be immediately implemented~~ to create compliance; **(b) or the applicant will need to** apply for a new growth management approval from the Growth Management Commission; **(c) license water rights to Carson City in an amount equal to any amount of water used or anticipated to be used in excess of this entitlement; or (d) offset any excess amount by use of well water, as permitted by the Nevada Division of Water.** In reviewing **any** ~~the~~ new growth management application, the Commission may require additional connection fees or other conditions. If physical improvements are deemed necessary, the City will be allowed to install equipment, or require the applicant to install equipment, which will limit the flow to the approved peak flow.

--

Please contact me with any questions. Thank you.

Michael Cabrera
Associate

MCabrera@lewisroca.com
D. 775.321.3452

LEWIS  ROCA

From: Christie Overlay <COverlay@carson.org>

Sent: Monday, September 13, 2021 8:20 AM

To: Cabrera, Michael <MCabrera@lewisroca.com>

Cc: Hope Sullivan <HSullivan@carson.org>; Heather Ferris <HFerris@carson.org>

Subject: GM-2021-0131 - Application Modifications

[EXTERNAL]

Good morning Michael,

Hope has request that the modifications of your application are submitted to us by End of Day today. If you have any question please let us know.

Thank you,

Christie Overlay

Planning Department - Office Specialist
108 E. Proctor Street
775.887.2180
coverlay@carson.org



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**STAFF REPORT FOR GROWTH MANAGEMENT COMMISSION
MEETING AUGUST 25, 2021**

FILE NO: GM-2021-0131

AGENDA ITEM: 6.A

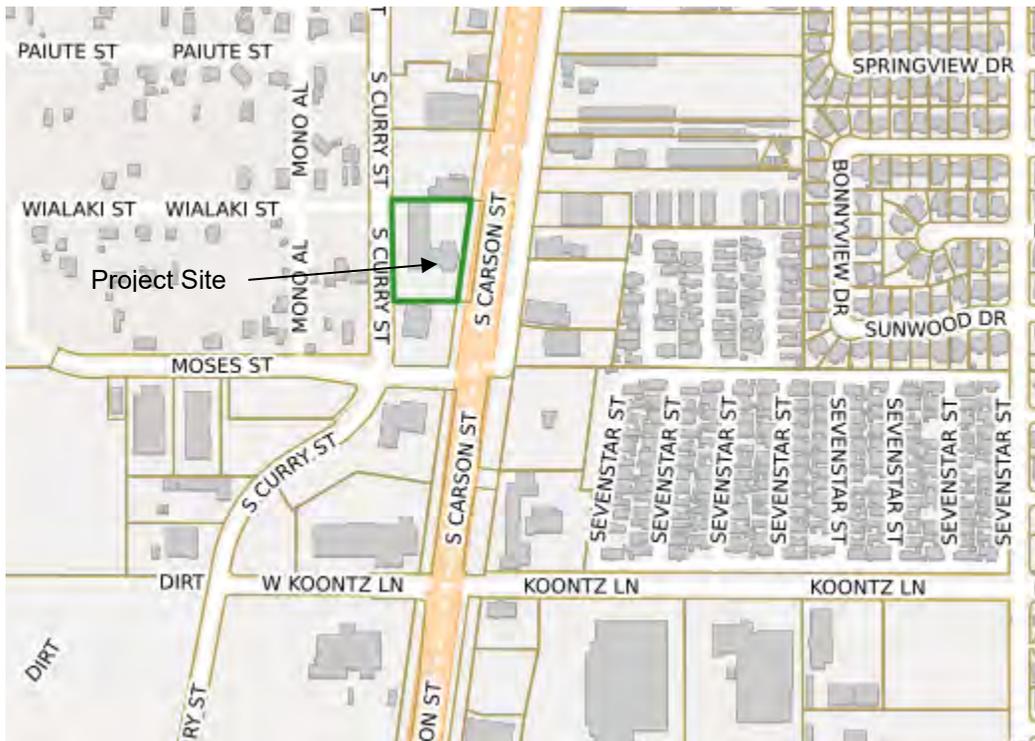
STAFF CONTACT: Hope Sullivan, Community Development Director

REQUEST: For Possible Action: Discussion and possible action regarding a request for Growth Management approval for a daily water usage above 15,000 gallons per day for a proposed drive-through carwash on property zoned Retail Commercial (RC), located at 3390 S. Carson Street, APN 009-111-28. (Hope Sullivan, hsullivan@carson.org)

STAFF SUMMARY: The applicant is proposing a drive-through carwash and requesting an average water usage of 46,000 gallons per day. Growth Management review and approval is required for any commercial use that uses more than 15,000 gallons of water per day.

RECOMMENDED MOTION: I move to deny GM-2021-0131 based on the inability to find that the proposed use will promote health, welfare, safety or quality of life; or create quality jobs, or promote recreation and tourism.

LOCATION:



RECOMMENDED CONDITIONS OF APPROVAL (If the Commission can make the findings to authorize water use in excess of 15,000 gallons per day):

1. The applicant must sign and return the Notice of Decision within 10 days of receipt of notification. If the Notice of Decision is not signed and returned within 10 days, the item may be rescheduled for the next Growth Management Commission meeting for further consideration.
2. At the time of building permit, an analysis must be provided to validate the estimated peak flow, including manufacturer specifications for the conveyor system, spray nozzles, lateral size and other mechanical equipment which impacts the peak flow. The peak flow for determining the water connection fee will be calculated as maximum day gallons per minute (gpm), as specified in the Carson City Connection Fee Rate Schedule. The calculated maximum peak flow rate will be limited to 90 gpm by the equipment installed, for any 15-minute period unless the applicant provides improvements to the City's water system which are shown by an engineering analysis to increase the available flow, subject to approval by the City Engineer.
3. Each year for three years after commencement of the use, the applicant shall submit to the Growth Management Commission documentation of actual water use in the form of gallons per day and peak flow for any consecutive 15 minutes. Documented accidental leaks, which have been properly repaired, will not count toward this peak flow. If it is found that the applicant is not in compliance with the Growth Management approval, either onsite modifications will need to be immediately implemented to create compliance, or the applicant will need to apply for a new growth management approval from the Growth Management Commission. In reviewing the new growth management application, the Commission may require additional connection fees or other conditions. If physical improvements are deemed necessary, the City will be allowed to install equipment, or require the applicant to install equipment, which will limit the flow to the approved peak flow.
4. Connection fees will be based on the allocated usage approved by this growth management application.
5. This approval does not constitute an approval of the site plan, building plans or sign plans. The Growth Management Commission is reviewing water use and not the site plan.
6. The approval is for average gallons per day water use and the estimated peak flow rate as determined by an engineering analysis of the equipment to be installed instead of using the average estimated flow with a peaking factor of three.
7. The use must be established on the site within two years of this approval. If the use is not established on the site within two years, the approval will expire and a new request must be submitted.
8. As part of the building permit, the applicant will abandon the existing well.

LEGAL REQUIREMENTS: CCMC 18.12.070 (Growth Management, Commercial and Industrial Permits)

MASTER PLAN DESIGNATION: Mixed Use Commercial (MUC)

ZONING DISTRICT: Retail Commercial (RC)

DISCUSSION: Per Carson City Municipal Code 18.12.070 the Board of Supervisors will determine, annually, the maximum daily water usage threshold for commercial and industrial building permits. In the event a commercial or industrial use exceeds the amount set by the Board, the applicant must apply for review and approval by the Growth Management Commission. The Commission may approve, approve with conditions, or deny on the basis of the effect of the project on the city's essential resources. The Commission must base its decision on the following:

- (1) Quantity of water consumed by the use for which the building is constructed compared to the availability of water;
- (2) Ability of the city to deliver water service to the structure;
- (3) Other effects of water usage;
- (4) Ability of the city's sewage disposal system to handle the quantity of wastewater generated, including the composition of the wastewater;
- (5) Ability of the City's sewer system to carry the wastewater for treatment; and
- (6) Other effects of wastewater disposal.

Quantity of water consumed

Carson City has established a threshold for average daily water usage for commercial and industrial projects of 15,000 gallons of water per day (GPD), above which an applicant is required to obtain approval from the Growth Management Commission prior to the issuance of a building permit. The applicant is proposing a car wash and has requested an average daily usage of 46,000 gallons per day.

Of note, the City maintains a water model that utilizes the Master Plan designations on a parcel basis to determine the overall water demand in the City. This helps the City to understand water demand at build out. In the analysis, the subject property did not have any existing water usage. This would typically indicate a vacant parcel. In this case, it was likely because the business was utilizing an on-site well or had been closed for a period of time. In the buildout forecast model, based on a Master Plan designation of Mixed Use Commercial, the model anticipated a water demand of 4,800 to 5,800 gallons per day.

Engineering staff has provided comparison data which shows that the request is significantly greater than the actual use by similar land uses in Carson City, and that the request is the equivalent of 108.2 Water Equivalent Residential Customers. The comparison data identifies three similar businesses in the City with a low water usage of 1,682 GPD and a high of 14,904 GPD.

Ability of City to Deliver Water

Development Engineering has reviewed the information submitted by the applicant and conferred with Public Works. Staff has determined that the City can adequately supply the requested water from the existing system subject to the conditions of approval in the staff report.

Other Effects of Water Usage

Part of the other effects of water usage includes the opportunity cost. The City's water resources are not infinite. With that in mind, the engineering staff provides the Commission with the water equivalent residential customer value. If water is assigned to Use A, it will not be available to Use B.

Specific policy criteria relative to commercial and industrial water demands has been included in

Resolution 2021-R-23 adopted by the Board of Supervisors on July 15, 2021. This criteria states:

“... the Growth Management Commission must first find that the use utilizes water conservation measures and techniques. If that finding is made, the Growth Management Commission must consider if the use will promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation and tourism. If both such findings are made, an application under subsection 5 can be granted.”

The applicant has advised that the proposed carwash will “utilize cutting edge water conservation measures and techniques.” The business owner is a member of the International Carwash Association and its Water Saver program. The business owner’s experience is to utilize 40 gallons of water per car wash whereas, per the applicant, “in bay automatics” found at gas stations utilize 75-150 gallons per vehicle and home car wash methods use 75 to 150 gallons per vehicle.

The applicant has advised that the carwash will create up to 15 quality jobs. Additionally, the business owner has a history of altruism including donating car washes to nurses during National Nurse Week, and providing free car washes to veterans, active service members, first responders and their families as part of Grace of Vets. Lastly, the business owner has partnered with local schools to provide charity carwashes to raise money for school activities.

Based on the materials submitted to date, staff does not find that the use will promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation and tourism.

Attachments:

- Water Use Application Form (GM-2021-0131)
- Email from Michael Cabrera, Lewis Roca Rothgerber Christie LLP, dated July 26, 2021
- Letter from James Cavilia, Allison MacKenzie, dated July 28, 2021
- Email from Michael Cabrera, Lewis Roca Rothgerber Christie LLP, dated July 6, 2021 with attachments

NEW WATER USE APPLICATION FORM

(Carson City Growth Management Commission)



Water Use Comparison

Type of Business : Conveyor Car Wash

Number of similar businesses found

#

Low: 1,682 (GPD)
Average: 9,336 (GPD)
High: 14,904 (GPD)

Amount Requested GPD
of equivalent WERCs

Water Rights Comparison

Low 1.9 (AC-FT/YR)
Average 10.5 (AC-FT/YR)
High 16.7 (AC-FT/YR)

Amount Requested AC-FT/YR

- Notes**
- 1: Water usage based on 1-year during 2020 calendar year
 - 2: Range of comparative values are for reference only, no warranty is given or implied for typical uses
 - 3: Carson City Municipal Code (CCMC) definition of Water Equivalent Residential Customer (WERC) value of 425/gpd

From: [Hope Sullivan](#)
To: [Christie Overlay](#)
Subject: FW: Growth Management Commission: Car Wash
Date: Wednesday, August 18, 2021 9:07:10 AM
Attachments: [image004.png](#)
[image005.png](#)
[image001.png](#)

Attachment 2 for GM-2021-0131

Hope Sullivan, AICP
Community Development Director
108 E. Proctor Street
Carson City, NV
775-283-7922



From: Cabrera, Michael <MCabrera@lewisroca.com>
Sent: Monday, July 26, 2021 5:39 PM
To: Hope Sullivan <HSullivan@carson.org>
Cc: Stephen Pottey <SPottey@carson.org>; Randall Rice <RRice@carson.org>; Ernie Ionno <eionno@att.net>; Gordon, Garrett <GGordon@lewisroca.com>; Gabe Wittler <gabe@odysseyreno.com>; Joshua Howa <josh@howadesign.com>; Mark Wray <mwray@markwraylaw.com>
Subject: RE: Growth Management Commission: Car Wash

This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.

Hope,

Below please find draft language for the memo which indicates how Metro Carwash will comply with the new required findings of approval. Feel free to use or modify however you see fit.

Further below, please find our requested modifications to the conditions of approval. As we briefly discussed earlier, we need to avoid any sort of strict limitation on our ability to draw water, but as written, Condition #2 would expressly restrict any gallon per minute ("GPM") draw to 30 GPM maximum. Instead, the condition should indicate that the GPM is based on a 24-hour average that corresponds with the 46,000 gallons per day ("GPD") request. This comes out to roughly 32 GPM. We understand that the triple-multiplier may apply in some instance, and we are willing to pay the same as everyone else. I provide language below.

Additionally, we ask for minor changes to conditions #3 and #7. The change to #3 only indicates that the GPM should be measured as an average over a 24-hour period, and the change to #7 seeks a period of 2 years before we must be operational.

Please let me know if these requests are achievable.

Thank you so much for all your help through this process. -Michael

-
-

Draft Language on new Findings

Metro Carwash (“Metro”) is proposing a state-of-the-art carwash facility which will utilize cutting edge water conservation measures and techniques. Metro is a locally owned and operated business, with all profits retained in the local community. Metro anticipates achieving an ultra-lean efficiency of energy and natural resources at the carwash, which will be environmentally friendly, and will be a gold standard employer and service provider. In short, Metro will be connected to Carson City’s sanitary sewer system, and nearly all of the water utilized will be returned to the City for adaptive reuse.

Metro is a certified member of the International Carwash Association and its Water Saver program. Strict guidelines and criteria must be met before certification is received. Metro has historically used approximately 40 gallons of water per car wash in its Reno (former) and Sparks locations. By utilizing modern car wash equipment, water reclamation systems, and production line control technology, Metro strives to further reduce fresh water consumption by 10-15%; perhaps as low as 32-36 gallons per vehicle (“GPV”) washed, +/- 5 GPV.

The professional car wash will provide a substantial benefit and service to the community by offering a carwash facility that will ultimately conserve significantly more water than home washes and other car wash alternatives offered in the region such as facilities commonly referred to as “in-bay automatics” typically located at gas stations, that typically use up to 75-150 GPV. This comports with Carson City’s “Water Conservation Tips” which recommends that residents utilize professional car washes because washing a car at home can use two to three times more water than a commercial car wash. Moreover, water used for home washes will flow into the street and storm drains, which cannot be as easily recovered and reused. By contrast, Metro’s car wash will capture nearly all water used on site to be returned to Carson City for future use. Home car wash methods use upwards of 75-150 GPV of fresh water per car wash, which is 3-6 times more water consumption per vehicle when compared to the new Metro Carwash. Assuming that every car washed at the new Metro would have otherwise utilized home car washes or less efficient car wash alternatives, we believe that Carson City will actually realize and accrue a net gain of water saved with every car washed at Metro. In fact, city water saved would easily calculate into millions of gallons of water saved annually.

The carwash will also meet the criteria that it “promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation and tourism”. The carwash will promote health, welfare, safety and quality of life by providing extensive water conservation and recycling, which will assist the City in protecting and conserving this natural resource. Conserving and recycling the water

supply will provide great benefit to the long term overall welfare of Carson City residents. Metro is committed to renewable energy sources, as demonstrated by Metro’s application to the SBA 504 Green Energy loan program, which has strict requirements for energy conservation to qualify for a loan. Metro is as dedicated to energy conservation as it is to water guardianship.

Additionally, the carwash will create up to 15 quality jobs as a new, locally owned and operated employer in Carson City. Metro Carwash’s founder, owner and operator, Ernie Ionno, is an active member of the Carson City Chamber of Commerce who believes the new Metro Carwash will be most appropriately located on the main street of Nevada’s Capitol City. The Metro project is already engaged with a number of local general contractors, engineers, architects, accountants, lawyers and other tradesmen. In fact, Metro will be the touchstone example for how modern car washes are designed, developed, and built today and into the future.

Metro will be a tremendous partner for the Carson City community. Metro has a rich history of donating over 10,000 car washes to nurses during National Nurses Week by partnering with area hospitals. Ernie and the Metro team champions and proudly honors Veterans, active service members, first responders, and their families with free car washes on Veterans’ Day as a part of Grace of Vets. As a family run business, Metro also has a long and proud tradition of partnering with area high schools to gift carwashes to local high schools for safe and sober nights and other events. Metro plans to offer partnerships to Carson City schools to provide charity carwashes to assist in raising money for various school activities – whereby local schools keep 50% of proceeds to support their causes. In doing so, schools raise more money, the City saves more water, and the water is not lost to storm drains. Metro anticipates that this joint effort and collaboration with leading industry experts, city engineers and planners, will be celebrated and enjoyed by our community.

Draft Modified Conditions

Proposed Condition #2

(strike all and replace)

2. The average flow will be approximately 32 gallons per minute, averaged over a 24-hour period.

Proposed Condition #3

3. Each year for three years after commencement of the use, the applicant shall submit to the Growth Management Commission documentation of actual water use in the form of **average** gallons per day and ~~peak~~ **average** gallons per minute. If it is found that the applicant is not in

compliance with the Growth Management approval, either onsite modifications will need to be immediately implemented to create compliance, or the applicant will need to apply for a new growth management approval from the Growth Management Commission. In reviewing the new growth management application, the Commission may require additional connection fees or other conditions.

Proposed Condition #7

7. The use must be established on the site within ~~one~~ **two** years of this approval. If the use is not established on the site within ~~one~~ **two** years, the approval will expire and a new request

must be submitted.

Michael Cabrera
Associate

MCabrera@lewisroca.com
D. 775.321.3452

LEWIS  ROCA

From: Hope Sullivan <HSullivan@carson.org>
Sent: Monday, July 26, 2021 9:34 AM
To: Cabrera, Michael <MCabrera@lewisroca.com>
Cc: Stephen Pottey <SPottey@carson.org>
Subject: Growth Management Commission: Car Wash

[EXTERNAL]

Michael:

Per our conversation, I plan to submit a memo to the Planning Commission responding to subsection 6 below:

5. Pursuant to Carson City Municipal Code Section 18.12, prior to issuance of building permits, any commercial or industrial projects proposed in 2022 that exceed the threshold of 15,000 gallons per day water usage must have the Growth Management Commission's review and approval to assure water availability.

6. In considering applications in response to subsection 5, the Growth Management Commission must first find that the use utilizes water conservations measures and techniques. If that finding is made, the Growth Management Commission must consider if the use will promote health, welfare, safety or quality of life; or create quality jobs; or promote recreation and tourism. If both such findings are made, an application under subsection 5 can be granted.

I understand that your client's project is proposed in 2021, but I believe the Commission will be considering the criteria in #6 as they have the right to do under CCMC 18.12.070. I am inviting you to provide a response to the criteria in #6 so that I can consider your thoughts when I prepare a memo to the Commission.

Also, I understand that you want to modify Condition 2 in the staff report. Please provide suggested alternative language for our consideration.

Thank you, and please call with any questions / concerns.

Hope Sullivan, AICP
Community Development Director
108 E. Proctor Street

Carson City, NV
775-283-7922



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 (1932-1997)

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) Carson City (and 78.3% of

Correspondence re GM-2021-0131

July 28, 2021

Page 2 of 2

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.

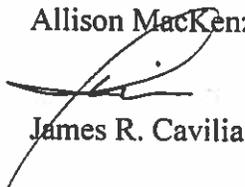
In order to protect the precious and finite water resources of our region and to ensure a level playing field with other businesses in Carson City, the request to use 46,000 gallons of water per day at the above-referenced location should be denied.

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

From: [Hope Sullivan](#)
To: [Christie Overlay](#)
Subject: FW: 3390 S. Carson St - Growth Management Commission request
Date: Wednesday, August 18, 2021 9:08:25 AM
Attachments: [image003.png](#)
[image004.png](#)
[Letter to Growth Commission \(final 07.06.21\).pdf](#)
[Metro Carwash - Updated Site Plan and Renderings \(07.06.21 submission\).pdf](#)
[image001.png](#)

Attachment 4 for GM-2021-0131: email with attachments

Hope Sullivan, AICP
Community Development Director
108 E. Proctor Street
Carson City, NV
775-283-7922



From: Cabrera, Michael <MCabrera@lewisroca.com>
Sent: Tuesday, July 6, 2021 1:56 PM
To: Hope Sullivan <HSullivan@carson.org>
Cc: ernie ionno <eionno@att.net>; Gabe Wittler <gabe@odysseyreno.com>; Joshua Howa <josh@howadesign.com>; Mark Wray <mwray@markwraylaw.com>; Gordon, Garrett <GGordon@lewisroca.com>
Subject: 3390 S. Carson St - Growth Management Commission request

This message originated outside of Carson City's email system. Use caution if this message contains attachments, links, or requests for information.

Hope,

Attached please find a letter to the Growth Management Commission requesting an average usage of 46,000 gallons per day at 3390 S. Carson Street. This letter provides background on the family run business and expertise of its operator, a detailed explanation and analysis of the request based on comparable sites in Reno and Sparks and on the City's water usage statistics, and a number of exhibits to support the statements made in the letter.

Also attached are updated renderings and a site plan for the proposed car wash facility.

Please do not hesitate to contact me with any questions.

Michael Cabrera

Associate

MCabrera@lewisroca.com

D. 775.321.3452



One East Liberty Street Suite 300

Reno, Nevada 89501-2128

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LEWIS ROCA ROTHGERBER CHRISTIE LLP

Learn more about the new Lewis Roca brand at lewisroca.com. Please note my new email address MCabrera@lewisroca.com.

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Carson City, Nevada
 Ernie Ionno, Local Carwash Operator
 PH: 775-762-9878 • metrocarwash.NV@att.net •
 July 6, 2021

METRO CARWASH

INTRODUCTION:

Metro Carwash desires to build a state-of-the-art car wash in Carson City, Nevada (the “City”). Metro has recently purchased the property located at 3390 S. Carson St. (“Property”), in the name of Capitol Carwash LLC, for this purpose. Metro Carwash hereby requests that the Growth Management Commission grant 46,000 gallons per day average usage for the Property. Metro further respectfully requests that the City waive the triple multiplier for estimating peak demand, which is related to connection fees, because Metro will be installing water storage tanks, which will be filling at a steady rate of 30 GPM over a 24-hour period (±5 GPM). This system will flatten peak demand spikes, for which the triple multiplier is intended. Additionally, as described herein, the City’s peak demand periods, which are from 4:00 am to 9:00 am and from 6:00 pm to 11:00 pm, are countercyclical with Metro’s ordinary peak demand hours, 9 am to 5 pm.

BACKGROUND:

Metro Carwash was founded in 2005 by 30-year car wash industry veteran, Ernie Ionno.¹ Metro was formerly located in Reno and Sparks, Nevada and the business operations were recently sold to focus on and pursue this endeavor.

Ernie is a protégée of brightest minds in professional car washing. When Ernie Ionno was 23 years old, he answered a help wanted ad printed in the local newspaper for the position of entry level car wash manager. Ernie officially joined the car wash industry in May of 1990 and started first by training as a car wash attendant. Ernie was hired by Bill Martin, the sitting president of the International Carwash Association (“ICA”) at that time, and later inducted into the ICA Car Wash Hall of Fame. Bill Martin was a tremendous mentor and influence, and Ernie was a quick study and he developed a passion for washing cars. Ernie promoted through the management ranks quickly; he then became a dynamic and well-respected car wash industry consultant, and ultimately settled in Reno, Nevada to start his own car wash company.

Ernie has worked with the best car wash operators all over the country, and he made a lifelong career in professional car washing. As a result, Ernie developed a talent and specialization for rescuing preexisting, under-performing, and less efficient car washes that were designed and built by novices. Despite these challenges, Ernie succeeded at identifying defunct facilities as opportunities, designing and implementing successful strategies, and maximizing the efficiency, potential performance, and profitability of each endeavor. In summary, Ernie is



(Pictured left to Right. Sergio Gomez, Metro Carwash Manager. Ernie Ionno, Founder of Metro Carwash. Circa 2008)



(Pictured left to right: Bob Hodge, legendary equipment designer and 2016 ICA Car Wash Hall of Fame; Benny Alford, past ICA President and 2005 Car Wash Hall of Fame; Joseph Moldovan, Qual Chem founder and EPA certified Green and Eco-Friendly; Ernie Ionno, Metro Carwash; Don Bruno, legendary car wash operator; Bill Martin, past ICA President and 2012 Car Wash Hall of Fame; William Ionno, Metro Carwash. Circa 2018)

¹ See **Exhibit A**, resume and professional qualifications of Ernie Ionno.

an express car wash expert, well known throughout the car wash industry, and who maintains an extensive network of industry advisors and friends. Ernie has unique experience operating car washes and a solid track record of success.

However, this experience is a means to an end. Ernie's ultimate goal and vision is to design and build a state-of-the-art car wash facility, with ultra-lean efficiency of energy and natural resources, that is environmentally friendly, and will be a gold standard employer and service provider. Ernie, an active member of the Carson City Chamber of Commerce, believes the new Metro Carwash will be most appropriately located on the main street of Nevada's Capitol City. In fact, Metro will be the touchstone example for how modern car washes are designed, developed, and built today and into the future. Metro anticipates that this joint effort and collaboration with leading industry experts, city engineers and planners, will be celebrated and enjoyed by our community.

METRO CARWASH REQUESTED WATER USAGE and PEAK DEMAND

Metro Carwash takes water & energy conservation seriously and continuously endeavors to improve efficiency. Metro is a member of the International Carwash Association and its Water Saver program. Strict guidelines and criteria must be met before certification is received. Metro has historically used approximately 40 gallons of water per car wash. However, we believe that with today's modern car wash equipment, water reclamation systems, and production line control technology, Metro will further reduce fresh water consumption by 10-15%; perhaps as low as 32-36 gallons per vehicle washed, +/- 5gpv. Metro is respectfully requesting that an average daily water use of 46,000 gallons per day be permitted by the City of Carson, because we believe professional car washes are a service to the community and that the Carson City motoring public will fully embrace Metro's state-of-the-art car wash facility.

All of south Carson City is served by one small outdated conveyor car wash built in the 80's. Therefore, it is reasonable to expect a much higher than average consumer use of less efficient car wash alternatives, such as in-bay automatics or self-washing at home. According to the Water Conservation Tips,² Washing your car at home can use two to three times more water than a commercial car wash, and water that flows into the street (and into the storm drain) cannot be recovered and reused. These alternative wash methods use upwards of 75-150 gallons of fresh water per car wash, which is a far greater amount of water consumption per vehicle when compared to the new Metro Carwash. Assuming that every car washed at the new Metro would have used the aforementioned car wash alternatives, we believe that Carson City will actually realize and accrue a net gain of water saved with every car washed at Metro. In fact, city water saved would easily calculate into millions of gallons of water saved annually.

Professional car washes typically make up less than 1% of a utility's or municipalities' total water use. It is believed that Carson City is grossly underserved by professional conveyerized car washes. It is far more likely that less than 1% of the city's water usage is consumed by professional car washes. According to the most recent Carson City water demand statistics,³ the City's average daily water use from June 1 thru September 30 is more than twenty-two million gallons of water per day (22,775,681); Metro Carwash is requesting approximately .002% of that demand/supply. Carson City's average daily use from October 1 thru May 31 is approximately 5-6 million gallons of water per day, and Metro Carwash is requesting approximately .0084% of that demand/supply.

Peak Demand: According to a chart describing the typical summer day demand on the City's Public Works Department website,⁴ the Carson City's peak hourly water demand is 1.1 to 1.7 million **gallons per hour**, which occurs during the

² Available at <https://www.carson.org/government/departments-g-z/public-works/water/conservation-tips>, attached as **Exhibit B**.

³ Available at www.carson.org/government/departments-g-z/public-works/water/daily-water-supply-demand attached as **Exhibit C**.

⁴ Available at www.carson.org/government/departments-g-z/public-works/water/daily-water-supply-demand, **Chart** attached as **Exhibit D**.

morning hours between 4am to 9am. The City's secondary peak hourly water demand is 1.1 to 1.2 million gallons per hour, which occurs between 8pm to 11pm.

Metro Carwash operating hours will be from 8am to 7pm, with peak hourly demand occurring between 10am to 5pm. Conversely, Metro's peak hourly demand occurs when the City's hourly demand is at its lowest, or approximately 5-6 hundred thousand gallons per hour. Metro Carwash desires the use of 46,000 gallons per day on average, which equates to 31.9 gallons per minute over a 24-hour period. Metro respectfully requests the City to waive the triple multiplier for estimating peak demand, which is related to connection fees, because Metro will be consuming water when the City's peak is at its lowest, and because the car wash is closed with no water demand for approximately 12+ hours per day, generally countercyclical to when the City's hourly water demand is at its peak. Please note that Metro Carwash is acting in good faith and is attempting to accurately estimate water consumption. Metro anticipates paying its appropriate connection fees to the City.

COMPARABLE SITES: METRO CARWASH HISTORIC WATER USAGE in RENO and SPARKS, NV:

Metro Carwash • Reno: 4991 Longley Ln 89502: Conveyorized Car Wash Tunnel 155 feet in length

This car wash was built in 1999, inside a shopping center by a shopping center developer, and was designed for rent and quick sale. The developer did not intend to operate this facility, so they only installed basic car wash equipment and a scant amount of water reclaim to save cost. This fledgling car wash had multiple tenants, repeated business failures, and was vacant 2 years before Metro Carwash acquired it in 2005. However, an extensive remodel and reconditioning was performed and in 3 short years post acquisition, Metro achieved the distinction of highest volume car wash in northern Nevada by washing 190,000 cars in 2008. Metro continued to innovate and implement industry best practices and grew the business to 233,000 cars washed annually. Metro's peak number of cars washed, and peak water used, was during the last 6 months of operation before selling in October, 2020. Metro strived to maintain the highest water efficiency possible with this facility and only consumed approximately 40 gallons per vehicle washed (+/- 5gpv). This equates to an average daily water consumption of approximately 32,000 gallons per day (+/- 3,000gpd). Metro Carwash water use table, including water and sewer bills for substantiation, is attached as **Exhibit E**.



(Pictured Above: Metro Reno Facility. Circa 2018)

Rail City Carwash (DBA Metro Carwash)

Sparks: 2401 Prater Way 89431: Conveyorized Car Wash Tunnel / 90 feet in length

This is a much smaller car wash and was built in 1987 by a group of investors/local doctors. This same group also built a second car wash in Carson City, located at 3130 S Carson St, circa 1988. The Carson City location changed hands several times over the years, and today it's operated by out-of-state, absentee owners.

While this developer did intend to own and operate these facilities, they were primarily managed and maintained by inexperienced college students. Car washes are mechanically complicated and maintenance



(Pictured Above: Sparks Facility "Before Pictures" 2008)



(Pictured Above: Sparks Facility "After Pictures" 2009)

intensive, and much of the wash equipment and water reclaim systems became inoperable or abandoned over time. The Sparks facility (pictured above) was run down and dilapidated when Metro Carwash first acquired it in 2008, only washing 75 cars per day.

Metro promptly closed the car wash and performed extensive repairs, reconditioning, upgrades, and implemented best practices. This location washes 190,000 cars annually and is a close 2nd place performer and northern Nevada record holder. This facility also achieved & maintained the highest water efficiency possible, and conserved water use to approximately 45 gallons per vehicle washed (+/- 5gpv). This equates to approximately 25,000 gallons per day on average (+/- 3,000da). Note: This car wash consumed more H2O per vehicle compared to the Reno Metro, but has a lower average daily water demand simply because it washes less cars. Rail City Carwash water use table, including water and sewer bills for substantiation, is attached as **Exhibit F**.

CONCLUSION: EAGER TO WORK WITH CARSON CITY

Metro has met with the City's professional engineering staff to discuss the state of art facility to be constructed in Carson City, specifically as relates to this request for water usage in average of 46,000 gallons per day. Staff indicated that the total gallons per day proposed should not provide an issue, but staff wanted to ensure that water usage during peak demand hours would not put a strain on the system. Based on staff's indication that peak hours will mostly occur outside of Metro's hours of operation, from 4 am to 9 am and from 8 pm to 11 pm,⁵ Metro understands that the car wash use should not provide any issue related to peak demand. However, if staff deems it necessary, Metro would agree to a condition of approval related to providing storage tanks that could be filled during off-peak hours and utilized in a manner to off-set peak demand.

Metro understands that a condition may be imposed which may require notice of this entitlement to be recorded against the Property, and conditions requiring further Growth Management approval if the average water usage is materially exceeded in the future.

For the reasons stated herein, we respectfully request that Growth Management Commission approve Metro's request for 46,000 gallons per day average water usage. Thank you.



⁵ See also Exhibit D (chart indicating peak hours).

HOME MEANS NEVADA: The benefits of Metro's Water Use Stays Home in Nevada:

Ernie and his family have made Nevada home over the last 20+ years, and he has lived in the Reno/Carson area longer than anywhere else in his lifetime. Metro is truly a locally owned and operated business by a Northern Nevadan. Metro Carwash will be the only locally owned & operated express conveyor car wash in Carson City. Nearly all company profits, employee earnings, and local taxes will be retained and redistributed in Carson City and the local economy. Additionally, Metro Carwash is an active member of the community and participates and gives back enthusiastically.



(Pictured Above from Left to Right: Nurse Jen, Renown. Ernie Ionno, Metro Carwash, Daughter Abigail Ionno, Metro Carwash. "Metro donates 10,000 Free Car Washes to Renown and Local Hospitals for the week long celebration of National Nurses Week." Circa 2018)



(Pictured Above from Left to Right: Daughter Emily Ionno, Metro Carwash with her brother, Pat Ionno, Metro Carwash. "Working the family business on weekends and representing properly." Circa 2007)



(Pictured Above from Left to Right: Ernie Ionno, Metro Carwash is with Former Reno Mayor Bob Cashell at a local awards ceremony for R.A.V.E. Volunteers. Circa 2008)



(Pictured Above: Abigail Ionno, Metro Carwash. Circa 2014)



(Pictured Above from Left to Right: Son William Ionno, Metro Carwash; Tom Hoffman Sr, ICA Past President and 1998 Car Wash Hall of Fame; Bill Martin, ICA Past President and 2012 Car Wash Hall of Fame. "William Ionno is developing relationships with Industry Giants at the International Car Wash Association Convention Circa 2018)



(Pictured Above: Bailey Allen, daughter of former Washoe County Sheriff Chuck Allen. "Bailey will always remember her 1st job with Metro Carwash. Circa 2007)

(Pictured Left to Right: Abigail Ionno, Metro Carwash is with Bob Hodge, Legenday Car Wash Designer and ICA Car Wash Hall of Fame . June 2021)



Abbie is visiting with Bob while he was giving us the cooks tour of his latest mega car wash. Bob is the lead designer for the new Carson City Metro Carwash.



METRO CARWASH

Exhibit A

Ernie Ionno, Local Carwash Operator

PH: 775-762-9878 • metrocarwash.NV@att.net

Car Wash Owner / Operator

Metro Carwash: 4991 Longley Ln, RENO 89502

Rail City Carwash: 2401 Prater Way, SPARKS 89431 (DBA Metro Carwash) 2005 – 2020

Within six months of selling his first car wash, Freeway Carwash, Reno NV, Ionno acquired another vacant carwash that was closed for more than two years, and for the six years prior, this location had a revolving door of poor tenants, repeated business failures, and a terrible reputation for quality and service. However, Ionno did an extensive remodel, reconditioning, and new building addition in 2005 and opened for business in January 2006. Metro Carwash quickly grew to the highest volume car wash in all northern Nevada and maintained that that distinction for 15 years; washing a whopping 250,000 cars in 2020.



CAR WASH EXPERT: Ernie Ionno, left, is pictured with Jim Viano, one of many longtime customers of Metro Carwash; Ionno founded Metro Carwash in 2005. Ernie is an express car wash expert and is well known throughout the car wash industry. He has unique and extensive experience operating car washes and a solid track record of success.

Ionno acquired a second location in September 2008. This new car wash is dynamically located on three busy intersections near the I-80 / 395 interchange. However, this car wash was in a state of disrepair, gross neglect, and on the brink of bankruptcy when Ionno took over. He immediately closed the car wash doors and performed an extensive repair & reconditioning, and reopened for business 30 days later under a new name, Rail City Carwash / DBA Metro Carwash. This facility quickly became a northern Nevada close 2nd place producer, washing 190,000 cars in 2020.

Ionno immediately closed the car wash doors and performed an extensive repair & reconditioning, and reopened for business 30 days later under a new name, Rail City Carwash / DBA Metro Carwash. This facility quickly became a northern Nevada close 2nd place producer, washing 190,000 cars in 2020.

Freeway Carwash

2000 – 2004

Owner / Operator

Ionno opened Freeway Carwash in December 2000 and achieved the distinction of highest volume car wash in Northern Nevada in less than 12 months. Phenomenal sales and income growth followed in the second and third years. Ionno sold Freeway Carwash in September 2004 and is actively looking to level up and re-enter the Reno Carwash Market.

Mace Security International

1999 - 2000

Vice President of Operations, Western Region

Recruited by Mace, a public company and one of the largest industry consolidators at the time. Ionno directly oversaw the operations of fourteen full service car washes with annual sales of ten million dollars. Ionno was also responsible for S.E.C. budgeting, strategic planning, shareholder reporting, general business administration, and 450 employees.

Car Wash Partners, Inc.

1997 - 1998

Director, Service Development

Recruited by Car Wash Partners, a leading industry consolidator at the time and known today as Mister Carwash, to design and implement operational improvement strategies for newly acquired units. Ionno made key contributions in organizational design and service development. Ionno also presented detailed analysis and operational improvement strategies to equity investors.

Car Wash Industry Consultant / Self Employed**1994 - 1996**

Lonno specialized in express detail implementation, extra service sales, production management, and other high performance operational methods. Lonno produced a comprehensive video training series for express detail sales, service procedures and management implementation. He was a featured speaker on these topics for the Northeast, Southeast, Southwest, Central States, Western States and International Carwash Associations, as well as a featured columnist for Professional Car Washing & Detailing magazine. Lonno developed and maintains an extensive industry network of successful high profile operators across the country.

Nu Look Car Washes, Boise ID**1990 – 1994****Plant Manager**

Lonno answered a car wash attendant help wanted ad printed in the local news paper and officially joined the car wash industry in May 1990. He was promoted to plant manager after eleven months of training and demonstration of his ability to produce results. In less than three years, Lonno increased the car wash volume by 50% and net sales by more than 100% by understanding the obstacles, developing solutions, applying appropriate action and creating an environment that had the best chance of success.

Youth Work History, FL & NJ**1982 – 1989**

- State of Florida, Corrections Officer: *Finished first in his academy for self-defense training.
- Zephyr Water: Bottled Water Delivery.
- Zephyr Airplane Engine: Cylinder machinist and mechanic for piston/prop aircraft.
- Top of Tampa Airport: Private plane valet and fuel pump jockey.
- Harding Construction: General framing and construction site cleanup.
- Cox Lumber: Assembled roof trusses.
- Zephyr Lumber yard: In store sales and full service lumber yard picker.
- Kirby Vacuums: In home demonstrations & sales.
- Saddle Brook Resort: Tennis court maintenance and pro shop sales.
- Good Times Pizza: Pizza cook & counter sales
- Village Inn, FL: Grill & Fry Cook.
- Golden Corral, FL: Grill & Fry Cook *Set record for most steaks cooked with no “recook or send back”.
- Seaside Heights, NJ: Boardwalk food & beverage delivery.

Carson City Public Works

Water Conservation Tips



Water is a precious resource in our environment. Growing populations and ongoing droughts are squeezing our water resources dry, causing natural habitat degradation and impacting our everyday use of water. We have no choice but to pay more attention to how we are using water, and how we may be wasting it. We must bridge the gap between our understandings of how important water is to our survival and what we can do to ensure that we have an adequate supply of clean water for years to come. Below is a partial list of the many simple ways you can take action and conserve water, both inside and outside our homes.

"Every Drop Counts" and every person can make a difference. Be aware of your [local water restrictions \(?navid=1747\)](#), make sure your children are aware of the need to conserve water, and follow the tips below to save one of our most precious resources.

[Toilets](#) / [Shower & Bath](#) / [Faucets](#) / [Dishwashers](#) / [Laundry Room](#) / [Other Tips](#) /
[Pool & Spas](#) / [Car Washing](#) / [Landscaping](#) / [Finding Leaks](#)

Toilets

Toilets consume about 27 percent of the water used inside the home. You can save water and money by checking your toilets for leaks and replacing your flapper. Installing an early-closure flapper can save from .5 to 1.5 gallons per flush.

Install a toilet dam or displacement device such as a bag or bottle to cut down on the amount of water needed for each flushing. Be sure installation does not interfere with operating parts.

Avoid unnecessary flushing. Dispose of tissues, insects, and other similar waste in the trash rather than the toilet.

If the toilet flush handle frequently sticks in the flush position, letting water run constantly, replace or adjust it.

Check for toilet leaks by adding food coloring to the tank. If the toilet is leaking, color will appear in the bowl within 30 minutes. Check the toilet for worn out, corroded, or bent parts. Consider purchasing Low Flow toilets that can reduce indoor water use by 20 percent.

Tips for fixing toilet leaks:

1. Lift up the float arm. If the water stops running, then you have found your problem. Adjust the float assembly until the water stops flowing.
2. If the toilet continues to run, examine the ball stopper or flapper valve. It should fit flush in its seat (no pun intended). If not, look at the lever and guide rods that operate the ball stopper. If they are crooked, gently straighten them. For toilets that have a chain pull attached to the flapper valve, make sure the chain is slack when the valve is seated to ensure a snug fit.
3. If the ball or flapper valve is worn out, replace it. Check for corrosion or deposits on the ball stopper or flapper valve. Use fine steel wool to remove build up from the seal so the stopper sets properly in the seat.
4. Inspect the small refill tube that connects the fill valve to the refill-overflow tube to be sure the smaller tube ends slightly above the standing water level of the completely filled tank. If necessary, gently pull the small tube upward until its end is correctly placed.

Shower/Bath

Showers comprise about 17 percent of the water used indoors. Replace any showerhead that allows a flow of more than 2.5 gallons per minute. Replace your showerhead with an ultra low-flow version, saving up to 2.5 gallons per minute.

Limit the length of your showers to 5 minutes or less. Reducing showering time by one minute can save up to 2,000 gallons of water per year.

Take shorter showers. Try a "Navy" shower: get wet, turn off the water, soap and scrub, then turn the water on to rinse.

In the shower, instead of increasing the hot or cold water flow to adjust the water temperature, try decreasing the flow to achieve a comfortable water temperature.

Use the minimum amount of water needed for a bath by closing the drain first and filling the tub only 1/3 full. The initial burst of cold water can be warmed by adding hot water later.

Take more showers than baths. If you do take a bath, don't fill the tub all the way. In-line water heaters or recirculation systems can save up to 30 gallons of water per day.



Don't let the water run while shaving, washing your face, or brushing your teeth.

Faucets

Faucets consume about 16 percent of the water used inside your home. Installing low-flow faucet aerators can reduce faucet water use by 50 percent.

A faucet that leaks 7 drops per minute can waste more than one gallon of water per day. Fix or replace leaking faucets.

Minimize the use of kitchen sink disposals; they require a lot of water to operate properly. Start a compost pile as an alternate method of disposing of food waste.

Store drinking water in the refrigerator rather than letting the tap run to get a cool glass of water.

Do not use running water to thaw meat or other frozen foods. Defrost them overnight in the refrigerator or by using the defrost setting on your microwave.

Consider installing an instant water heater on your kitchen sink so you don't have to let the water run while it heats up. Your kitchen faucet should not have a flow rate of more than 2.5 gallons per minute.

Your bathroom faucet should not have a flow rate of more than 2.5 gallons per minute.

If your home was built before 1989, you might have older, inefficient fixtures.

Dishwashers

When purchasing a new dishwasher, look for water and energy saving options.

When used properly, dishwashers can be more efficient than hand washing. Only run the dishwasher when it is completely full and use the water-level settings (if available) for the most efficient run.

When washing dishes by hand, fill one sink or basin with soapy water. Quickly rinse under a slow stream of water from the faucet. Use the dirty water to run your sink disposal, if necessary.

Laundry Room

Laundry consumes about 21 percent of water used inside the home. Each load of laundry uses between 27 to 54 gallons of water.

Look for high-efficiency water saving washing machines when purchasing new to reduce water and energy usage up to 50 percent.

Horizontal loading machines use less water than top-loading machines.

Only wash full loads to save both water and energy.

Use the water level setting if your washer has one. Some loads take less water than others.

Other tips

Reuse fish tank water on your household plants and outdoors. It makes nice fertilizer, too.

Repair dripping faucets by replacing washers. If your faucet is dripping at the rate of one drop per second, you can expect to waste 2,700 gallons per year.

Insulate your water pipes. You will get hot water faster and avoid wasting water.

Pools & Spas

Cover your pool. An exposed pool loses 50 to 70 gallons of water per square foot per year to evaporation. During the hot summer months, you may lose up to 4 inches of water each week.

Plant trees and shrubs that buffer your pool, but won't shed or drop leaves in the water.

Consider a new water-saving pool filter. A single back flushing with a traditional filter uses from 180 to 250 gallons of water.

You can wash cartridges on landscape areas since chlorinated pool water is diluted with clean water. Never allow wash water to run into the street.

Test pool and spa water frequently and maintain appropriate chemical balances so as to shorten changing frequency.

Warmer water means higher evaporation rates. Professionals recommend 78 degrees Fahrenheit as the ideal recreational pool temperature.

When you drain your pool or spa to the sanitary sewer, you allow the water to be cleaned and used again, rather than wasted.



Car Washing

Commercial car washes recycle water on-site or send it to a water treatment facility, where it is cleaned and returned to the water cycle.

Washing your car at home can use two to three times more water than a commercial car wash, and the water that flows into the street can't be recovered and reused.

If you wash your car at home, make sure you put a nozzle on your hose, or you will waste water and may be cited for a water waste violation. Park it on the grass, use a bucket with soapy water, turn off the water while soaping, and use a hose with a pressure nozzle to decrease rinsing time.

Landscaping

Do not over water your lawn.

Do not water your street, driveway, or sidewalk. Position your sprinklers so that your water lands on the lawn and shrubs and the unpaved areas.

Install sprinklers that are the most water-efficient for each use such as micro and drip irrigation and soaker hoses.

Regularly check sprinkler systems and timing devices to be sure they are operating properly. Teach your family how to shut off automatic systems so they can turn them off when storms are approaching. Some timers have rain delay features.

Do not leave sprinklers or hoses unattended. Your garden hose can pour out 600 gallons or more in only a few hours. Use a kitchen timer to remind yourself to turn the water off.

Raise your lawn mower blade to at least three inches. A lawn cut higher encourages grass roots to grow deeper, shades the root system, and holds soil moisture better than closely-clipped lawns.

Avoid over fertilizing your lawn. The application of fertilizers increases the need for water and is a source of water pollution.

Mulch to retain moisture in the soil. Mulching also helps to control weeds that compete with plants for water.

Plant native and/or drought-tolerant grasses, ground covers, shrubs, and trees. Check with your local nursery for advice. Group plants together based on similar water needs.

Minimize the grass areas in your yard because less grass means less water.

Invest in a rain gauge to determine how much rain or irrigation your yard has received.

Avoid the installation of ornamental water features unless the water is recycled.

Watering in the early morning before the sun is intense helps reduce the waste lost from evaporation. Installing rain gutters and collecting water from downspouts also helps reduce water use.

Use a hose to water brown spots on your lawn.

Put a spray nozzle with a cutoff handle on your hose so water doesn't flow continuously.

Use hose washers between spigots and water hoses to eliminate leaks.

If you have a well at your home, check your pump, listen to see if the pump turns on and off while the water is not in use. If it does, you may have a leak.

Finding Leaks

You know you have a leak when your faucet drips, but do you know how to find a hidden leak? If you suspect you have a phantom water waster on your



Carson City's Water Supply & Demand:

Water is essential to all of us and it is important that our community have enough to meet its daily needs, as well as for emergencies, like fighting fires.

On this page, you will find a snapshot of Carson City's current water supply and community usage. You will also learn tips on using water wisely, including how to follow the City's seasonal water restrictions.

Water Supply & Usage

Carson City utilizes water from three groundwater basins, and surface waters from Ash Canyon and Kings Canyon Creek, Carson River and the Marlette/Hobart system. Carson City Water Utilities practices conjunctive use, in which surface water usage is maximized to help reduce the use of wells and to conserve groundwater.

The city's water usage in winter is 5-6 million gallons per day. During the summer, usage can jump as high as 24 million gallons per day. This increase is due to outside irrigation. Below is a snapshot of the city's supply and usage.

[Chart \(/home/showpublisheddocument/10545/635984946921000000\)](/home/showpublisheddocument/10545/635984946921000000) (Typical Summer day demand)

Be Water Smart

You can help conserve Carson City's water supply and save money in the process! First, follow Carson City's Summer [Water Restriction \(/government/departments-g-2/public-works/water/water-restrictions\)](/government/departments-g-2/public-works/water/water-restrictions) **Schedule:**

From June 1 through September 30, residents are asked to follow a watering schedule based on the *last digit* of your home address:

- **Odd addresses** water on Tuesdays, Thursdays and Saturdays
- **Even addresses** water on Sundays, Wednesdays and Fridays
- **No watering on Mondays**—this gives our storage tanks a chance to refill.

Second, follow these 10 tips for reducing your water usage:

1. Water your lawn only when it needs it.
2. Adjust your sprinklers so that water lands on your lawn or garden where it belongs - not on sidewalks or driveways.
3. Fix leaky faucets and plumbing joints.
4. Do not run the hose while washing your car. Instead, use a bucket of water and/or a controllable nozzle.
5. Install water-saving shower heads or flow restrictors.
6. Run only full loads in the washing machine and dishwasher.
7. Shorten your showers.
8. Use a broom instead of a hose to clean driveways and sidewalks.
9. Don't use your toilet as a wastebasket.
10. Don't waste water. For example, while you wait for hot water to come down the pipes, catch the flow in a watering can to use on house plants or your garden.

Thank you for helping us conserve Carson City's water supply.

EXHIBIT D: Metro Carwash, Page 1 of 1

<https://www.carson.org/government/departments-g-z/public-works/water/daily-water-supply-demand>

Chart (Typical Summer day demand)

Carson City: Typical Peak Demand by Hour

Metro Carwash: Typical Peak Demand by Hour

HOUR	GALLONS PRODUCED	DEMAND	TO/(FROM) TANKS	TOTAL STORAGE	HOUR	GALLONS PRODUCED	DEMAND	TO/(FROM) TANKS	TOTAL STORAGE
1	919,359	945,943	(26,584)	19,316,554	13	948,626	578,435	370,191	18,366,580
2	939,774	900,121	39,653	19,356,206	14	944,243	587,095	357,147	18,723,728
3	945,493	923,659	21,835	19,378,042	15	940,724	580,828	359,897	19,083,624
4	947,655	1,112,005	(164,350)	19,213,692	16	917,556	498,305	419,252	19,502,876
5	977,768	1,447,499	(469,732)	18,743,960	17	904,642	535,594	369,048	19,871,924
6	1,010,483	1,731,300	(720,817)	18,023,142	18	884,500	724,332	160,168	20,032,092
7	1,002,797	1,450,351	(447,554)	17,575,588	19	899,327	845,886	53,441	20,085,532
8	988,430	1,204,734	(216,304)	17,359,284	20	912,208	1,081,380	(169,172)	19,916,360
9	989,757	1,085,849	(96,093)	17,263,192	21	923,117	1,175,872	(252,755)	19,663,606
10	976,481	878,893	97,589	17,360,780	22	925,700	1,135,310	(209,611)	19,453,994
11	957,756	717,952	239,804	17,600,584	23	944,793	1,109,832	(165,039)	19,288,956
12	949,484	553,680	395,804	17,996,388	24	982,907	970,828	12,079	19,292,272
Total:					22,733,577 22,775,681 (42,103)				

EXHIBIT E: Metro Carwash

Substantiation Attached Separately

METRO CARWASH - RENO - HISTORICAL WATER USE REFERENCES: Q2 & Q3, 2020

LOCATION 1: Metro Carwash - RENO 4991 Longley Ln 89502

			City of Reno	Avg Daily	Gallons	NOTES				
Q3-2020	Cars Washed	TMWA	Sewer	Gallons	Per Vehicle	*TMWA not available at time of report, TBP				
Sept 1-30, 2020	22,174	897,000	**	30,931	41.9	TMWA Billing Cycle: 09/08 - 10/07, 2020: 29 Days				
Aug 1-31, 2020	23,718	898,000	**	28,063	36.7	*TMWA "Sept bill, last month history detail" 32 days				
July 1-31, 2020	25,157	*	989,010	32,967	40.6	**Reno sewer billed quarterly, est 33.3% July usage				
TOTALS	71,049		2,970,000	32,283	39.2					

			City of Reno	Avg Daily	Gallons	NOTES				
Q2-2020	Cars Washed	TMWA	Sewer	Gallons	Per Vehicle					
June 1-30, 2020	22,680	1,045,000	**	31,667	41.9	TMWA Billing Cycle: 06/05 - 07/08, 2020: 33 Days				
May 1-31, 2020	22,643	876,000	**	30,207	41.4	TMWA Billing Cycle: 05/07 - 06/05, 2020: 29 Days				
Apr 1-30, 2020	15,477	781,000	**	26,033	50.5	TMWA Billing Cycle: 04/07 - 05/07, 2020: 30 Days				
TOTALS	60,800	2,702,000	2,198,000	29,692	44.4	TMWA 2,702,000 / 60,800 Cars Washed = 44.4 GPV				
						**Reno Sewer Billed Quarterly				

EXHIBIT F: RAIL CITY CARWASH (DBA: Metro Carwash)

Substantiation Attached Separately

METRO CARWASH - SPARKS - HISTORICAL WATER USE REFERENCES: Q2 & Q3, 2020

LOCATION 2: Rail City Carwash - 2401 Prater Way SPARKS 89431 (DBA Rail City Carwash)

			City of Sparks	Avg Daily	Gallons	NOTES				
Q3-2020	Cars Washed	TMWA	Sewer	Gallons	Per Vehicle	**City of Sparks billed Monthly				
Sept 1-30, 2020	16,299	615,000	634,000	20,500	38.9	TMWA Billing Cycle: 08/31 - 09/30, 2020: 30 Days				
Aug 1-31, 2020	17,084	634,000	735,000	20,452	43.0	*TMWA "Sept bill, last month history detail" 31 days				
July 1-31, 2020	18,499	*	811,000	27,033	43.8					
TOTALS	51,882		2,180,000	23,696	42.0					

			City of Sparks	Avg Daily	Gallons	NOTES				
Q2 -2020	Cars Washed	TMWA	Sewer	Gallons	Per Vehicle					
June 1-30, 2020	17,108	811,000	792,000	25,344	47.4	TMWA Billing Cycle: 05/29 - 06/30, 2020: 32 Days				
May 1-31, 2020	17,879	792,000	618,000	27,310	44.3	TMWA Billing Cycle: 04/30 - 05/29, 2020: 29 Days				
Apr 1-30, 2020	12,446	618,000	506,000	20,600	49.7	TMWA Billing Cycle: 03/31 - 04/30, 2020: 30 Days				
TOTALS	47,433	2,221,000	2,198,000	24,154	46.8					

METRO CARWASH-RENO

4991 Longley Ln Reno, NV 89502

Year Built: 1999 Metro Established: 2005 Metro Sold: 2020

Q-2, 2020 Monthly Water Use Analysis:

	Cars Washed	TMWA	City of Reno Sewer	Avg Daily Gallons	Gallons Per Vehicle	NOTES
June 1-30, 2020	22,680	1,045,000	**	31,667	41.9	TMWA Billing Cycle: 06/05 - 07/08, 2020: 33 Days
May 1-31, 2020	22,643	876,000	**	30,207	41.4	TMWA Billing Cycle: 05/07 - 06/05, 2020: 29 Days
Apr 1-30, 2020	<u>15,477</u>	<u>781000</u>	**	<u>26,033</u>	<u>50.5</u>	TMWA Billing Cycle: 04/07 - 05/07, 2020: 30 Days
Q2 2020 TOTALS	60,800	2,702,000	2,198,000	29,692	44.4	TMWA 2,702,000 / 60,800 Cars Washed = 44.4 GPV
** City of Reno Sewer billed quarterly						

See Attached Substantiation

General Sales Report

Metro Carwash
Metro Carwash

Mon 06/01/2020 12:00:00am
Tue 06/30/2020 11:59:59pm

Description	Price	Quantity	Amount	Description	Price	Quantity	Amount
CARWASH SALES				LESS EXP. DET. COUPONS-			
WASH PACKAGES-				TOTAL: 0 0.00			
Midtown Wash	2.75	8,397	23,091.75	NET EXP. DET. SALES: 0.00			
Uptown Wash	5.75	5,851	33,643.25	NET SITE SALES: 252,969.12			
Turtle Wax Ice Wash	7.75	3,790	29,372.50	ARM PLANS SOLD-			
Downtown Wash	7.75	3,584	27,776.00	Unl. Midtown Sld	14.99	174	2,608.26
Super Hard Shell Wsh	11.75	1,058	12,431.50	Unl. SuperHard Sld	27.86	74	2,061.57
TOTAL:		22,680	126,315.00	Unl. TW Ice Sld	24.69	78	1,925.84
WASH EXTRA SERVICES-				Unl. Uptown Sld	19.99	126	2,518.74
Triple Foam	1.00	8	8.00	TOTAL:		452	9,114.41
Tire Shine	2.00	5	10.00	ARM PLANS RECHARGED-			
Turtle Wax Ice Extr	3.00	5	15.00	Unl. Midtown Rchg	14.99	1,256	18,827.44
Super Hardshell Extr	4.00	17	68.00	Unl. SuperHard Rchg	29.99	11	329.89
TOTAL:		35	101.00	Unl. TW Ice Rchg	24.99	530	13,244.70
OTHER WASH SERVICES-				Unl. Uptown Rchg	19.99	675	13,493.25
Misc. Wash	7.06	287	2,026.25	TOTAL:		2,472	45,895.28
TOTAL:		287	2,026.25	ARM PLANS REDEEMED-			
GROSS WASH SALES- 262,114.25				Unl. Midtown Rdmd	-9.75	4,218	-41,121.50
LESS WASH DISCOUNTS-				Unl. SuperHard Rdmd	-18.75	232	-4,350.00
Winco 50%Off Downtwn	-3.50	5	-17.50	Unl. TW Ice Rdmd	-14.75	1,992	-29,377.00
Rewash-TW Ice	-7.75	30	-232.50	Unl. Uptown Rdmd	-12.75	2,290	-29,186.50
Rewash-Downtown	-7.75	53	-410.75	TOTAL:		8,732	-104,035.00
Rewash-Midtown	-2.75	25	-68.75	ARM PLANS TERMINATED-			
Rewash-Base	-7.00	72	-504.00	Discontinue ARM Plan	0.00	101	0.00
Comp. Wash-Pkg	-5.92	116	-687.00	Switch ARM Plan	0.00	2	0.00
Comp Wash-Base	-7.00	116	-812.00	Terminate ARM Plan	0.00	69	0.00
Rewash-Uptown	-5.75	17	-97.75	Unl. Midtown Rfnd	-0.78	33	-25.74
Misc. Wash Discount	-15.80	24	-379.13	Unl. TW Ice Rfnd	-2.56	23	-58.88
Reno PD HA Disc.	-2.00	58	-116.00	Unl. Uptown Rfnd	-1.22	15	-18.29
Washoe Co. HA Disc.	-1.50	9	-13.50	WEB Discontinue ARM	0.00	3	0.00
TOTAL:		525	-3,338.88	TOTAL:		246	-102.91
LESS LOYALTY DISC-				PREPAIDS SOLD-			
7-DayRtrn-Midtown	-1.00	1	-1.00	Buy3 Get1 Dntown	23.25	155	3,603.75
Today's Midtown Dsc	-9.74	172	-1,675.00	Buy3 Get1 SprHrdShll	56.97	1	56.97
Today's TW Ice Dsc	-14.75	77	-1,135.75	Buy3Get1 Midtown	29.25	13	380.25
Today's Uptown Dsc	-12.73	126	-1,603.50	Buy3Get1 TW Ice	44.25	5	221.25
7-DayRtrn-base	-3.50	1	-3.50	Buy3Get1 Uptown	38.25	22	841.50
Today's SHard Dsc	-18.75	74	-1,387.50	Buy4 Get2 Dntown	31.00	20	620.00
TOTAL:		451	-5,806.25	Buy4 Get2 SprHrdShll	75.96	20	1,519.20
NET CARWASH SALES: 252,969.12				Buy4Get2 Midtown	39.00	217	8,463.00
EXPRESS DETAIL SALES				Buy4Get2 TW Ice	59.00	43	2,537.00
EXPRESS DETAIL SALES-				Buy4Get2 Uptown	51.00	119	6,069.00
TOTAL:		0	0.00	TOTAL:		615	24,311.92
EXPRESS DETAIL SALES				LESS PREPAIDS REDEEMED-			
TOTAL: 0 0.00				B4G2-SprHrdShll Rdmd	-18.75	26	-487.50
				TW Ice Wash Ppd Rdmd	-14.75	174	-2,566.50
				Midtown Ppd Rdmd	-9.74	405	-3,944.75
				B4G2-Uptown Rdmd	-12.72	197	-2,506.75

METRO CAR WASH LLC

Page 1
 Account No. 01315134
 Billing Date 07/10/20
 Next Meter Read Date 08/07/20

TRUCKEE MEADOWS WATER AUTHORITY

Service Address:
 4991 LONGLEY LN
 RENO, NV 89502-5953

Previous Statement Balance	Payments	Balance Forward (=)	Additional Activity (+ or -)	New Water Charges (+)	NEW Charges Past Due On	New Balance (=)
\$3,076.83	\$3,076.83 CR	\$0.00	\$0.21 CR	\$3,697.98	07/31/20	\$3,697.77

If "Balance Forward" is not a credit, this amount may be past due. Please pay immediately to avoid collection activity.

Previous Statement Balance		\$3,076.83
Payments	Payment - THANK YOU	\$3,076.83 CR
	Total Payments	\$3,076.83 CR
Balance Forward		
	Total Balance Forward	\$0.00
Additional Activity	RapidPay Credit	\$0.21 CR
	Total Additional Activity	\$0.21 CR
New Water Charges	Water Charges (see detail on back)	\$3,472.29
	Regional Water Mgmt Fee - 1.5%	\$52.08
	Right of Way Toll-Reno - 5%	\$173.61
	Total New Water Charges	\$3,697.98
	New Balance	\$3,697.77

Customer Service 775-834-8080 Monday - Friday 7:30 a.m. - 5:30 p.m.	Payment Options Please visit www.tmwa.com or call 775-834-8080.	Main Office and Payment Location 1355 Capital Blvd., Reno, NV 89502 Monday - Friday 8:00 a.m. - 5:00 p.m.
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T10100710-9395-00000162

Please return this portion with your payment to ensure proper credit to your account.
 Please write your account number on your check
 and make your check payable to TMWA. Thank you!

TRUCKEE MEADOWS WATER AUTHORITY

Account No. 01315134 Amount Due:
 Past Due On: 07/31/20 Amount Enclosed: \$ _____

*** DO NOT PAY ***

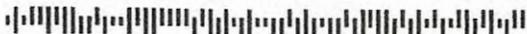
Your bank account will be drafted on 07/31/20

004698 000000162



METRO CAR WASH LLC
 3270 ROXBURY DR
 RENO NV 89523-6207

Truckee Meadows Water Authority
 PO Box 70002
 Prescott, AZ 86304-7002



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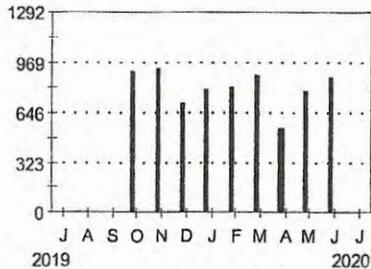


The amount due on this billing will be drafted from your bank account. Please do not pay this bill; it is for notification purposes only.

Every month, our water quality scientists perform 1,000 tests and take up to 200 samples from locations throughout the community. That's how we ensure that your water consistently meets high-quality standards. Read more in our 2020 Water Quality Report: www.tmwa.com/waterquality2020.

Water Charges

Avg Use per Month (1,000 gallons)



USAGE HISTORY	No. DAYS	GALLONS	AVG USE PER DAY	AVG COST PER DAY
THIS MONTH	33	1,045,000	31,667	105.22
LAST MONTH	29	876,000	30,207	99.63
LAST YEAR	32	1,292,000	40,375	135.14

Meter	Rate Code	No. of Days	From Date	To Date	Prior Reading	Current Reading	Reading Type	Factor	Billed Usage
32203420	GMW02	33	06/05	07/08	20867	21912	Actual	1	1045

Customer Charge	JUNE 20	2" Service	\$28.54
Tier 1 Water Usage Charge	50 THOUSAND GALLONS X 1.82000		\$91.00
Tier 2 Water Usage Charge	160 THOUSAND GALLONS X 2.95000		\$472.00
Tier 3 Water Usage Charge	835 THOUSAND GALLONS X 3.45000		\$2,880.75
TOTAL CURRENT CHARGES - Water Charges			\$3,472.29

Right-of-Way Toll and Regional Water Management Fees

Right-of-Way Tolls are charged to utilities and telecommunications companies for the right to use property owned by the government, for example streets. The fee for Reno residents is 5% of the water charges. The fee for Sparks residents is 5% of the water charges. The Regional Water Management Fee is imposed by Washoe County on behalf of the Western Regional Water Commission (in compliance with Washoe County Ordinance No. 935). This fee is 1.5% of total bill excluding Late Charge, Right-of-Way Toll and Other charges.

Both of these fees are regulated and imposed by the local governments. These charges are collected by TMWA and passed on to the local governments. TMWA has no control or discretion over these fees.

Late Charges

Regular bills for service are rendered on a monthly basis and are due and payable on receipt. "New Water Charges" become PAST DUE after the date noted in the "NEW Charges Past Due On" box on the front of this bill. A termination-of-service notice may be issued if payment has not been received within four (4) working days after the Past Due Date. If payment is late a five percent (5%) late charge shall be assessed. In addition, TMWA may require a customer to pay a security deposit.

ARE YOU CHANGING YOUR MAILING ADDRESS?

Truckee Meadows Water Authority (TMWA) customer mailing addresses are validated by NCOA Link - a system operated by the United States Postal Service (USPS). NCOA Link automatically updates your mailing address to the address stored in the USPS database.

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Please refer to your local post office branch office for details.



CITY OF RENO
 SEWER SERVICE BILLING
 PO BOX 49045
 SAN JOSE, CA 95161-9045

Phone: (775) 334-2095
 Hours: 9:00am - 4:00pm Mon-Fri

ACCOUNT NUMBER	904921-001
BILL TYPE	Commercial
SERVICE ADDRESS	4991 Longley Ln
BILLING PERIOD	07/01/2020 - 09/30/2020
TO AVOID PENALTY PAY BY	09/30/2020
TOTAL AMOUNT DUE UPON RECEIPT	\$ 15,214.36

SERVICE DATES	Read Type	Previous Read	Current Read	WATER CONSUMPTION (per 1,000 gallons used)
FROM: 04/01/2020 TO: 06/30/2020	TMWA	113928	116126	Billed Consumption: 2198 Total Consumption: 2198

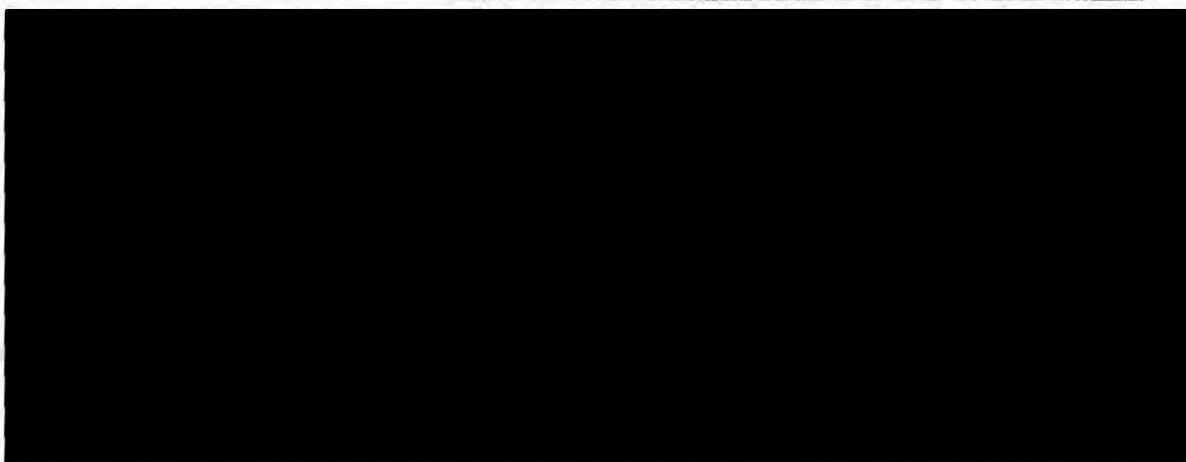
CHARGES OR CREDITS	
PREVIOUS BALANCE:	\$ 17,221.16
ACTIVITY:	
Sewer OM & R	10,342.91
Sewer Capital	4,867.25
Administrative Charge	4.20
PAYMENTS:	
Payment (Payment Received: 04/30/2020)	17,221.16 CR
DUE UPON RECEIPT	
TOTAL AMOUNT DUE	\$ 15,214.36

MESSAGE:

Transactions made after 6/30/2020 may not be reflected on this bill. For payment online and/or to view/receive bills via email, go to www.reno.gov and follow the links under Online Services. If using I-Pad or mobile device, be sure to select "Desktop View" at Payment Home Page. Due to the current Coronavirus, no penalties have been assessed. All payments are due September 30, 2020. If you are a cash paying customer please contact our office.

With your payment, you are authorizing the City of Reno to use the information on your check or credit card to make a one-time electronic debit from your account at the financial institution indicated on your payment instrument. If we cannot collect your electronic payment, we will charge back your sewer account for the uncollected amount and charge the applicable city fee (as per the fee schedule).

A 15% penalty will be charged against all delinquent accounts not postmarked by the due date. Any unpaid sewer fee charges and penalties accrued thereon shall constitute a lien being filed against the property serviced. Pursuant to RMC SEC 12.16.440.



General Sales Report

Metro Carwash
Metro Carwash

Fri 05/01/2020 12:00:00am
Sun 05/31/2020 11:59:59pm

Description	Price	Quantity	Amount	Description	Price	Quantity	Amount
CARWASH SALES				EXPRESS DETAIL SALES			
WASH PACKAGES-				EXPRESS DETAIL SALES-			
Midtown Wash	2.75	8,391	23,075.25	TOTAL:		0	0.00
Uptown Wash	5.75	5,501	31,630.75	LESS EXP. DET. COUPONS-		0	0.00
Turtle Wax Ice Wash	7.75	4,252	32,953.00	TOTAL:		0	0.00
Downtown Wash	7.75	3,615	28,016.25	NET EXP. DET. SALES:			0.00
Super Hard Shell Wsh	11.89	884	10,509.40	NET SITE SALES:			251,488.08
TOTAL:		22,643	126,184.65	ARM PLANS SOLD-			
WASH EXTRA SERVICES-				Unl. DowntownSld	9.75	1	9.75
Triple Foam	1.00	6	6.00	Unl. Midtown Sld	14.99	213	3,192.87
Tire Shine	2.00	4	8.00	Unl. SuperHard Sld	29.30	7	205.09
Turtle Wax Ice Extr	3.00	3	9.00	Unl. TW Ice Sld	24.99	102	2,548.98
Turtle Wax Fire Wax	2.00	2	4.00	Unl. Uptown Sld	19.86	127	2,522.74
Super Hardshell Extr	4.00	413	1,652.00	TOTAL:		450	8,479.43
TOTAL:		428	1,679.00	ARM PLANS RECHARGED-			
OTHER WASH SERVICES-				Unl. Midtown Rchg	14.99	1,187	17,793.13
Misc. Wash	7.90	309	2,442.50	Unl. TW Ice Rchg	24.99	521	13,019.79
TOTAL:		309	2,442.50	Unl. Uptown Rchg	19.99	615	12,293.85
GROSS WASH SALES-				TOTAL:		2,323	43,106.77
			263,502.15	ARM PLANS REDEEMED-			
LESS WASH DISCOUNTS-				Unl. DowntownRdmd	-7.75	1	-7.75
Winco 50%Off Downtwn	-3.50	2	-7.00	Unl. Midtown Rdmd	-9.75	4,019	-39,185.25
Rewash-TW Ice	-7.75	50	-387.50	Unl. SuperHard Rdmd	-18.75	3	-56.25
Rewash-Downtown	-7.75	34	-263.50	Unl. TW Ice Rdmd	-14.74	2,067	-30,473.50
Rewash-Midtown	-2.75	21	-57.75	Unl. Uptown Rdmd	-12.75	2,107	-26,856.25
Rewash-Base	-7.00	84	-588.00	TOTAL:		8,197	-96,579.00
Comp. Wash-Pkg	-5.88	105	-617.75	ARM PLANS TERMINATED-			
Comp Wash-Base	-7.01	106	-742.75	Discontinue ARM Plan	0.00	106	0.00
Rewash-Uptown	-5.75	13	-74.75	Terminate ARM Plan	0.00	52	0.00
Misc. Wash Discount	-5.16	738	-3,809.08	Unl. Midtown Rfnd	-0.73	22	-16.01
Reno PD HA Disc.	-2.00	75	-150.00	Unl. TW Ice Rfnd	-5.46	13	-70.97
NDOT HA Disc.	-2.00	6	-12.00	Unl. Uptown Rfnd	-1.00	17	-16.94
Washoe Co. HA Disc.	-1.50	7	-10.50	WEB Discontinue ARM	0.00	5	0.00
TOTAL:		1,241	-6,720.58	TOTAL:		215	-103.92
LESS LOYALTY DISC-				PREPAIDS SOLD-			
7-DayRtrn-Midtown	-1.00	1	-1.00	Buy3 Get1 Downtown	23.25	236	5,487.00
Owner Wash-Base	-7.00	1	-7.00	Buy3 Get1 SprHrdShll	56.97	2	113.94
Owner Wash-Extra	-11.99	1	-11.99	Buy3Get1 Midtown	29.25	36	1,053.00
Today's Downtown Dsc	-7.75	1	-7.75	Buy3Get1 TW Ice	44.25	34	1,504.50
Today's Midtown Dsc	-9.75	210	-2,047.50	Buy3Get1 Uptown	38.25	59	2,256.75
Today's TW Ice Dsc	-14.75	99	-1,460.25	Buy4 Get2 SprHrdShll	75.96	2	151.92
Today's Uptown Dsc	-12.73	127	-1,616.25	TOTAL:		369	10,567.11
7-DayRtrn-base	-3.50	2	-7.00	LESS PREPAIDS REDEEMED-			
Today's SHard Dsc	-18.75	7	-131.25	B4G2-SprHrdShll Rdmd	-18.89	5	-94.47
7-DayRtrn-TW IceWash	-3.50	1	-3.50	TW Ice Wash Ppd Rdmd	-14.75	161	-2,374.75
TOTAL:		450	-5,293.49	Midtown Ppd Rdmd	-9.75	249	-2,427.75
NET CARWASH SALES:			251,488.08				

MAY-20

TRUCKEE MEADOWS WATER AUTHORITY

Service Address:
 4991 LONGLEY LN
 RENO, NV 89502-5953

Previous Statement Balance	Payments	Balance Forward (=)	Additional Activity (+ or -)	New Water Charges (+)	NEW Charges Past Due On	New Balance (=)
\$2,727.77	\$2,727.77 CR	\$0.00	\$0.21 CR	\$3,077.04	06/30/20	\$3,076.83

If "Balance Forward" is not a credit, this amount may be past due. Please pay immediately to avoid collection activity.

Previous Statement Balance		\$2,727.77
Payments	Payment - THANK YOU	\$2,727.77 CR
	Total Payments	\$2,727.77 CR
Balance Forward		\$0.00
	Total Balance Forward	\$0.00
Additional Activity	RapidPay Credit	\$0.21 CR
	Total Additional Activity	\$0.21 CR
New Water Charges	Water Charges (see detail on back)	\$2,889.24
	Regional Water Mgmt Fee - 1.5%	\$43.34
	Right of Way Toll-Reno - 5%	\$144.46
	Total New Water Charges	\$3,077.04
	New Balance	\$3,076.83

Customer Service 775-834-8080 Monday - Friday 7:30 a.m. - 5:30 p.m.	Payment Options Please visit www.tmwa.com or call 775-834-8080.	Main Office and Payment Location 1355 Capital Blvd., Reno, NV 89502 Monday - Friday 8:00 a.m. - 5:00 p.m.
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TI0100609-9483-000000161

Please return this portion with your payment to ensure proper credit to your account.
 Please write your account number on your check
 and make your check payable to TMWA. Thank you!

TRUCKEE MEADOWS WATER AUTHORITY

Account No. 01315134 Amount Due:
 Past Due On: 06/30/20 Amount Enclosed: \$ _____

*** DO NOT PAY ***

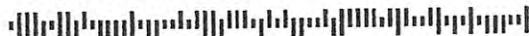
Your bank account will be drafted on 06/30/20

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METRO CAR WASH LLC
 3270 ROXBURY DR
 RENO NV 89523-6207

Truckee Meadows Water Authority
 PO Box 70002
 Prescott, AZ 86304-7002



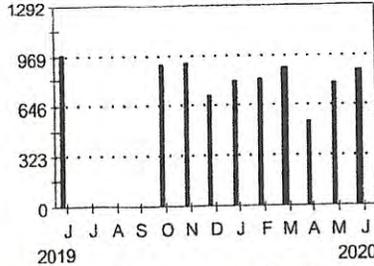
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Water Charges

Avg Use per Month (1,000 gallons)



Meter	Rate Code	No. of Days	From Date	To Date	Prior Reading	Current Reading	Reading Type	Factor	Billed Usage
32203420	GMW02	29	05/07	06/05	19991	20867	Actual	1	876

Customer Charge	MAY - 20	2" Service	\$28.54
Tier 1 Water Usage Charge	50 THOUSAND GALLONS X 1.82000		\$91.00
Tier 2 Water Usage Charge	160 THOUSAND GALLONS X 2.95000		\$472.00
Tier 3 Water Usage Charge	666 THOUSAND GALLONS X 3.45000		\$2,297.70
TOTAL CURRENT CHARGES - Water Charges			\$2,889.24

USAGE HISTORY	No. DAYS	GALLONS	AVG USE PER DAY	AVG COST PER DAY
THIS MONTH	29	876,000	30,207	99.63
LAST MONTH	30	781,000	26,033	85.38
LAST YEAR	31	972,000	31,355	103.89

Right-of-Way Toll and Regional Water Management Fees

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General Sales Report

Metro Carwash
Metro Carwash

Wed 04/01/2020 12:00:00am
Thu 04/30/2020 11:59:59pm

Description	Price	Quantity	Amount	Description	Price	Quantity	Amount
CARWASH SALES				NET SITE SALES: 163,756.88			
WASH PACKAGES-				ARM PLANS SOLD-			
Midtown Wash	2.75	5,364	14,751.00	Unl. Midtown Sld	14.99	157	2,353.43
Uptown Wash	5.75	2,835	16,301.25	Unl. TW Ice Sld	24.99	78	1,949.22
Uptown Wash old	5.75	435	2,501.25	Unl. Uptown Sld	19.99	94	1,879.06
Downtown Wash	7.75	3,691	28,605.25	TOTAL:		329	6,181.71
Turtle Wax Ice Wash	7.75	3,140	24,335.00	ARM PLANS RECHARGED-			
Super Hard Shell Wsh	11.99	12	143.88	Unl. Midtown Rchg	14.99	1,151	17,253.49
TOTAL:		15,477	86,637.63	Unl. TW Ice Rchg	24.99	489	12,220.11
WASH EXTRA SERVICES-				Unl. Uptown Rchg	19.99	581	11,614.19
Triple Foam	1.00	16	16.00	TOTAL:		2,221	41,087.79
Tire Shine	2.00	4	8.00	ARM PLANS REDEEMED-			
TOTAL:		20	24.00	Unl. Midtown Rdmd	-9.75	2,809	-27,385.75
OTHER WASH SERVICES-				Unl. TW Ice Rdmd	-14.75	1,471	-21,690.25
Misc. Wash	2.95	336	991.50	Unl. Uptown Rdmd	-12.74	1,394	-17,763.50
TOTAL:		336	991.50	TOTAL:		5,674	-66,839.50
GROSS WASH SALES- 170,155.13				ARM PLANS TERMINATED-			
LESS WASH DISCOUNTS-				Discontinue ARM Plan	0.00	94	0.00
Winco 50%Off Downtwn	-3.50	1	-3.50	Terminate ARM Plan	0.00	47	0.00
Rewash-TW Ice	-7.75	49	-379.75	Unl. Midtown Rfnd	0.00	17	0.00
Rewash-Downtown	-7.75	20	-155.00	Unl. TW Ice Rfnd	-1.37	14	-19.17
Rewash-Midtown	-2.75	22	-60.50	Unl. Uptown Rfnd	0.00	16	0.00
Rewash-Base	-7.00	88	-616.00	WEB Discontinue ARM	0.00	14	0.00
Comp. Wash-Pkg	-5.82	86	-500.50	TOTAL:		202	-19.17
Comp Wash-Base	-7.00	86	-602.00	PREPAIDS SOLD-			
Rewash-Uptown	-5.75	17	-97.75	Buy3 Get1 Dntown	23.25	126	2,929.50
Misc. Wash Discount	-14.38	4	-57.50	Buy3Get1 Midtown	29.25	32	936.00
Reno PD HA Disc.	-2.00	44	-88.00	Buy3Get1 TW Ice	44.25	12	531.00
NDOT HA Disc.	-2.00	4	-8.00	Buy3Get1 Uptown	38.25	30	1,147.50
Washoe Co. HA Disc.	-1.50	2	-3.00	TOTAL:		200	5,544.00
TOTAL:		423	-2,571.50	LESS PREPAIDS REDEEMED-			
LESS LOYALTY DISC-				TW Ice Wash Ppd Rdmd	-14.75	100	-1,475.00
Today's Midtown Dsc	-9.75	155	-1,511.25	Midtown Ppd Rdmd	-9.75	234	-2,281.50
Today's TW Ice Dsc	-14.75	77	-1,135.75	B4G2-Uptown Rdmd	-12.75	73	-930.75
Today's Uptown Dsc	-12.69	93	-1,179.75	Downtown Ppd Rdmd	-7.75	705	-5,463.75
TOTAL:		325	-3,826.75	B3G1-TW Ice Rdmd	-14.75	4	-59.00
NET CARWASH SALES: 163,756.88				B3G1-Uptown Rdmd	-12.75	110	-1,402.50
EXPRESS DETAIL SALES				B3G1-Downtown Rdmd	-7.75	10	-77.50
EXPRESS DETAIL SALES-				B3G1-Midtown Rdmd	-9.75	1	-9.75
TOTAL:		0	0.00	B2G1 Downtown Rdmd	-7.75	6	-46.50
LESS EXP. DET. COUPONS-				CARD-TW Ice Rdmd	-14.75	6	-88.50
TOTAL:		0	0.00	CARD-Uptown Rdmd	-12.75	10	-127.50
NET EXP. DET. SALES: 0.00				CARD-Downtown Rdmd	-7.75	23	-178.25
				CARD-Midtown Rdmd	-9.75	16	-156.00
				TOTAL:		1,298	-12,296.50
				LESS WEBSITE DISC/RDMD-			
				TOTAL:		0	0.00
				LESS WEBSITE DISC/RDMD-			

TRUCKEE MEADOWS WATER AUTHORITY

Service Address:
 4991 LONGLEY LN
 RENO, NV 89502-5953

Previous Statement Balance	Payments	Balance Forward (=)	Additional Activity (+ or -)	New Water Charges (+)	NEW Charges Past Due On	New Balance (=)
\$1,845.95	\$1,845.95 CR	\$0.00	\$0.21 CR	\$2,727.98	06/01/20	\$2,727.77

If "Balance Forward" is not a credit, this amount may be past due. Please pay immediately to avoid collection activity.

Previous Statement Balance		\$1,845.95
Payments	Payment - THANK YOU	\$1,845.95 CR
	Total Payments	\$1,845.95 CR
Balance Forward		\$0.00
	Total Balance Forward	\$0.00
Additional Activity	RapidPay Credit	\$0.21 CR
	Total Additional Activity	\$0.21 CR
New Water Charges	Water Charges (see detail on back)	\$2,561.49
	Regional Water Mgmt Fee - 1.5%	\$38.42
	Right of Way Toll-Reno - 5%	\$128.07
	Total New Water Charges	\$2,727.98
	New Balance	\$2,727.77

Customer Service 775-834-8080 Monday - Friday 7:30 a.m. - 5:30 p.m.	Payment Options Please visit www.tmwa.com or call 775-834-8080.	Main Office and Payment Location 1355 Capital Blvd., Reno, NV 89502 Monday - Friday 8:00 a.m. - 5:00 p.m.
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T10100511-9337-000000160

Please return this portion with your payment to ensure proper credit to your account.
 Please write your account number on your check
 and make your check payable to TMWA. Thank you!

TRUCKEE MEADOWS WATER AUTHORITY

Account No. 01315134 Amount Due:
 Past Due On: 06/01/20 Amount Enclosed: \$ _____
 *** DO NOT PAY ***

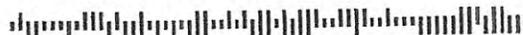
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004669 000000160



METRO CAR WASH LLC
 3270 ROXBURY DR
 RENO NV 89523-6207

Truckee Meadows Water Authority
 PO Box 70002
 Prescott, AZ 86304-7002



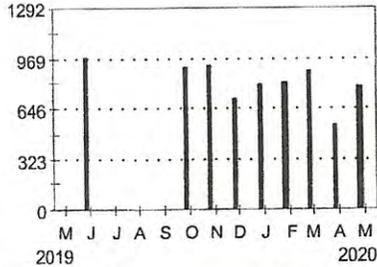
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Water Charges

Avg Use per Month (1,000 gallons)



Meter	Rate Code	No. of Days	From Date	To Date	Prior Reading	Current Reading	Reading Type	Factor	Billed Usage
32203420	GMW02	30	04/07	05/07	19210	19991	Actual	1	781
Customer Charge							2" Service		\$28.54
Tier 1 Water Usage Charge				50 THOUSAND GALLONS X 1.82000					\$91.00
Tier 2 Water Usage Charge				160 THOUSAND GALLONS X 2.95000					\$472.00
Tier 3 Water Usage Charge				571 THOUSAND GALLONS X 3.45000					\$1,969.95
TOTAL CURRENT CHARGES - Water Charges									\$2,561.49

APR-20

USAGE HISTORY	No. DAYS	GALLONS	AVG USE PER DAY	AVG COST PER DAY
THIS MONTH	30	781,000	26,033	85.38
LAST MONTH	32	541,000	16,906	54.17
LAST YEAR	29	1,007,000	34,724	115.21

Right-of-Way Toll and Regional Water Management Fees

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METRO CARWASH-RENO

4991 Longley Ln Reno, NV 89502

Year Built: 1999 Metro Established: 2005 Metro Sold: 2020

Q-3, 2020 Monthly Water Use Analysis:

	Cars Washed	TMWA	City of Reno Sewer	Avg Daily Gallons	Gallons Per Vehicle	NOTES
						*TMWA not available at time of report, TBP
Sept 1-30, 2020	22,174	897,000	**	30,931	41.9	TMWA Billing Cycle: 09/08 - 10/07, 2020: 29 Days
Aug 1-31, 2020	23,718	898,000	**	28,063	36.7	*TMWA "Sept bill, last month history detail" 32 days
July 1-31, 2020	<u>25,157</u>	<u>*</u>	<u>989,010</u>	<u>32,967</u>	<u>40.6</u>	**Reno sewer billed quarterly, est 33.3% July usage
Q3 2020 TOTALS	71,049		2,970,000	32,283	39.2	

See Attached Substantiation