IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

FILED
OCT 05 1989
STATE ENGINEER'S OFFICE

IN THE MATTER OF APPLICATION NUMBER 53434,
FILED BY WASHOE COUNTY, NEVADA,
ON June 23 19 89, TO APPROPRIATE THE
WATERS OF Underground

PROTEST

Comes now Cities of Reno and Sparks
Printed or typed name of protestant
whose post office address is P. O. Box 1900, Reno, Nevada 89505
Street No. or P.O. Box, City, State and Zip Code
whose occupation is municipalities, and protests the granting
of Application Number 53434, filed on June 23, 19 89
by Washoe County, Nevada to appropriate the
Printed or typed name of applicant
waters of Underground situated in Washoe
Underground or name of stream, lake, spring or other source
County, State of Nevada, for the following reasons and on the following grounds, to wit:

See attached.

THEREFORE the protestant requests that the application be denied
(Denied, issued subject to prior rights, etc., as the case may be)
and that an order be entered for such relief as the State Engineer deems just and proper.

Signed [signature] (Agent)
Agent or protestant
William E. Isaeff
Printed or typed name, if agent
Address P. O. Box 1900
Street No. or P.O. Box No.
Reno, Nevada 89505
City, State and Zip Code No.

Subscribed and sworn to before me this 5th day of October 1989.

Christy Daneau
Notary Public

CHRISTY DANEAU
Notary Public - State of Nevada
Appointment Recorded in Washoe County
MY APPOINTMENT EXPIRES JAN. 14, 1992

State of State of Nevada
County of Washoe

$10 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE. ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.

2454 (Revised 6-80)

O-2035

ATTACHMENT TO PROTEST OF APPLICATIONS NO. 53406-53434

BY THE CITIES OF RENO AND SPARKS

In accordance with NRS 533.370(3), upon information and belief, it is the position of the cities of Reno and Sparks, Nevada that granting by the State Engineer of the subject application, together with other similar pending applications, may prove highly detrimental to the public interest, to wit:

1. Introduction to the Truckee Meadows at this time of large quantities of water of unknown quality may seriously threaten and impair the existing and future water quality of the Truckee River, which is the main source of safe drinking water for residents of the cities of Reno and Sparks.

2. Introduction to the Truckee Meadows at this time of large quantities of water of unknown quality may seriously impact both operations and maintenance at either or both the Reno-Sparks Wastewater Treatment Facility and the Reno-Stead Wastewater Treatment Facility (both of which are municipally owned wastewater treatment facilities costing tens of millions of dollars to construct, operate and maintain).

3. Introduction to the Truckee Meadows at this time of large quantities of water of unknown quality may seriously increase the risk of NPDES permit discharge violations by the operators of the referenced wastewater treatment facilities and the large financial costs associated with any such violations.

4. Introduction to the Truckee Meadows at this time of large quantities of water of unknown quality may seriously increase

the risk of harm to endangered and threatened species in Pyramid Lake or to other fauna, flora or fish dependent upon the water of the Truckee River and therefore lead to a demand for costly modifications and/or additions to one or both of the municipally owned and operated wastewater treatment facilities referenced herein.

5. The proposed place of use described in the subject application is inconsistent with public media statements attributed to the applicant's agent (Western Water Development Company, Inc.), thus suggesting the application is either incomplete or in error.

6. The subject application merely indicates the proposed manner of use for the subject water will be municipal. Since a large water purveyor already serves substantial portions of the north and south Truckee Meadows, critical, detailed information on the actual uses to which the subject water will be placed must be made known and carefully evaluated to insure proper coordination with and/or integration into the existing complex water distribution system in the Truckee Meadows. Key questions relating to the introduction of this large quantity of unknown water, as the same may relate to furtherance of the public interest, include will such water be available to meet drought conditions by residents of the cities of Reno and Sparks, will it be available for toxic spill protection, etc.?

The cities of Reno and Sparks believe a public hearing on the subject application, together with all related, similar pending applications, would be in the public interest. The cities of Reno and Sparks respectfully reserve their right to submit

additional evidence relevant to their points of protest and any additional matters that may affect the citizens of their respective cities as such evidence and information becomes available.