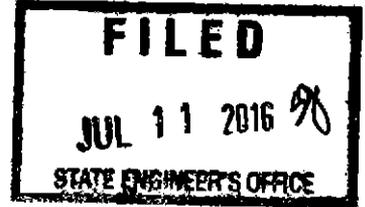


IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA



IN THE MATTER OF APPLICATION NUMBER 86224
FILED BY Bright-Holland Co., a Nevada Corporation
ON May 24, 20 16



PROTEST

Comes now Washoe County, a Political Subdivision of State of Nevada
Printed or typed name of protestant
whose post office address is 1001 E. 9th street, P.O. Box 11130, Reno NV 89520-0027
Street No. or PO Box, City, State and ZIP Code
whose occupation is Political Subdivision of State of Nevada and protests the granting
of Application Number 86224, filed on May 24, 20 16
by Bright-Holland Co., a Nevada Corporation for the
waters of Underground situated in Washoe
an underground source or name of stream, lake, spring or other source
County, State of Nevada, for the following reasons and on the following grounds, to wit:

Please refer to attached exhibit "A"

2016 JUL 11 PM 3:55

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 or protestant
Vahid Behmaram (agent)
Printed or typed name, if agent
Address 1001 E. 9th street, P.O. Box 11130,
Street No. or PO Box
Reno NV 89520-0027
City, State and ZIP Code
(775)954-4647
Phone Number
vbehmaram@washoecounty.us
E-mail

State of Nevada
County of Washoe

Subscribed and sworn to before me on July 11, 2016
by Vahid Behmaram

[Signature of Kathleen M. Emerson]
Signature of Notary Public Required



+ \$30 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE.
ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.

Exhibit "A"

Applications 86224 & 86225

The above referenced applications propose to appropriate ground water from the Hualapai Flat Hydro-graphic Basin.

United States Geologic Survey (USGS) Open File Report # 78-768 estimates the sustainable yield of this basin to be 6700 acre-feet annually. Existing ground water appropriations in the form of permits and certificates exceed 25,000 acre-feet in this basin.

NRS 533.370 (2) states that:

*The State Engineer is prohibited by law from granting an application to appropriate the public waters of State of Nevada where:*

- A. There is no unappropriated water at the proposed source;*
- B. The proposed use or change conflicts with existing rights;*
- C. The proposed use or change conflicts with protectable interests in the existing domestic wells as set forth in NRS 533.024; or*
- D. The proposed use or change threatens to prove detrimental to the public interest*

Therefore, based on the foregoing Washoe County request that these applications be denied as granting them would be contrary to the provisions of NRS 533.370 (2) listed above.

It is normal and customary practice that new development within those hydrographic basins with no new available water resources, to rely on conversion of existing water rights and water resources. The conversion from other uses, most often irrigation use, to municipal, industrial or commercial use is the normal process to meet the water demands of new development and support growth in general. This practice has been the norm within the Truckee Meadows for several decades. Therefore, it is not the intent of the protestant to impede commercial development within this basin, rather to insure a sustainable source of water supply for this proposed project and all growth within Washoe County, as required under Washoe County Development Code.