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P.O. Box 285
Silver Springs, NV 89429-0285

Phone: (775) 577-2223 Fax: (775) 577-9166

Telecommunications Relay Service: 711

Website Address: www.silverspringsmwc.com

September 16, 2024

Edwin James, General Manager
Carson Water Sub-Conservancy District
777 E. Williams St, Ste 209
Carson City, NV 89703

Re: Carson River Sub-Conservancy District/Lumos Silver Springs Purveyor Data memo

Dear Mr. James,

On behalf of the members of the Silver Springs Mutual Water Company (SSMWC), the Board of Trustees respectfully requests that the memo prepared by Lumos Engineering be withdrawn, and all affiliated governmental agencies, whether, including the USGS and Nevada State Engineer, be made aware of the withdrawal and the inaccuracies of the report. It is our view that the memo has caused confusion and created an inaccurate perception of our water basin, which can lead to very detrimental outcomes for the members of the water company.

As you stated at our May 16th board meeting, the purpose of the memo is to provide accurate and usable information for support. Unfortunately, the authors of the memo failed to utilize the information provided by SSMWC from the beginning in the modelling efforts, and, as a result, the report for this water system is not complete and is misleading.

The study effort by the Carson River Sub-Conservancy District (which was funded by grant monies) puts SSMWC in a position to either engage (at its own expense) or suffer the consequences of erroneous data submitted to USGS and ultimately the Nevada State Engineer. The data is erroneous and leads to false characterizations and conclusions. Further, and more troubling, the data submitted from this effort is likely to be detrimental to the water company in addition to being contrary to the water system water resource plan. The preparation of this report has also caused concern at the Nevada Division of Water Resources, especially regarding well pumpage that was not communicated to SSMWC prior to draft documentation being prepared by Lumos. This result being, again, further expense to the water company to manage incorrect information.

Specific points that are of issue:

- SSMWC water service area and usage of 2020 U.S. Census data
- SSMWC production well information and inclusion of domestic well totals
- SSMWC production well totals and flow rates
- Perennial Yield Constraints and domestic well totals

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- Modelled Options, well and water system operation, and well capacity figures

SSMWC understands that the plan documents are not a water master plan and the Lumos report is not modelling system constraints. What is less clear is the purpose of submitting water system information to public agencies, especially when much of the data is factually incorrect. Because the data is false, because the conclusions are inaccurate and misleading, a feeling of skepticism and concern about the intent of the memo has been created and must be addressed.

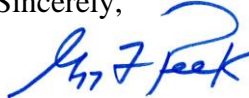
If the USGS needs information to support modelling efforts, the water resource plan prepared for SSMWC and filed with the Nevada State Engineer can be utilized to support the model parameters and provide context around growth and growth projections in the water service area.

This report submittal puts SSMWC in a challenging position where the Board must make a decision to be contrary to technical work and potentially opposed to other stakeholders in the river corridor. Withdrawing the report, notifying all stakeholders and government entities of its inaccuracies and starting over (and including SSMWC from the beginning), is a step in the right direction toward addressing the skepticism and concern over the intent of the memo.

Please provide confirmation regarding the process and timing for withdrawing the report and the next steps, if any, in setting straight the pumpage data record and restoring trust.

Thank you for your time and attention to this matter.

Sincerely,



Gregory Peek, President
SSMWC Board of Directors

Cc: Eric Morway, USGS
Adam Sullivan, State Engineer, NDWR
Mike Workman, Board Chairman, CWSD
David Bruketta, Utilities Director, Lyon County Utilities