

MEMBERS PRESENT: A quorum present

GUESTS: Ms. Lora M. Del Carlo
Ms. JoAnne McLachlan, Storey Co. Commission
Mr. Duane McNeilley
Ms. Gwen McNeilley
Mr. Chris Brown
Ms. Lori Carpenter
Mr. Wayne Tetrault, Manufactured Hsg. Div.
Mrs. Mimi Rodden, H P & A
Mr. Larry Wahrenbrock
Mr. Gilbert Flores, Latin C of C

Chairman Dini called the meeting to order at 8:05 A.M. The first bill to be heard is AB-661 - Provides for apportionment of water and arbitration of certain disputes within Virginia City water district.

Mr. Dini: For the benefit of the members of the committee, the Virginia City Water District encompasses Virginia City, Gold Hill and Silver City. The Storey County Commissioners administer the water for that district. For some time, there has been a dispute between Silver City and Lyon County versus Storey County in regard to the allocation of water and hookups being allowed. That's what this bill is about.

Mr. Chris Brown, a resident of Silver City and on the Town Board: I would like the record to show that I am representing myself, as an individual and a water user. I am not authorized by the town to speak for the entire community. We feel that the bill will bring about some fairness that we have been needing. We feel that the bill in effect deals with fair play for all the users in the district and assures equals treatment for all the users in the district. We would like to look at this water district as an entire district, rather than two communities who have different political lines and different geographical lines, etc. If this bill passes, it could bring about a lot of peace of mind for people who are planning to do any building in our area because the way it stands now, nobody could plan on doing any building because it is such an unsure thing to get water service. Although we have an entitlement to water service--it is the same water right as Storey County's water right--Section 1 apportions 75% to 25%, which may not be the right language for distributing the water. Quantity-wise, it would seem fair to us, but we feel that that first line is not really important to what we need to have to help solve our problem here. I think a lot of people in the

district are having a problem with this 75%-25% split. If you look at percentages of how it is being used right now, we are currently using considerably less than 25% of water available. We would like to be able to have whatever water is legally allowed to us, when we need it. That is one of the things that this arbitration board would handle. It is not exactly spelled out how the arbitration board will operate, but one of the things that should be in their functions is that their decisions would be binding in the event of a dispute between Lyon County users and Storey County users. The board should be able to deal with other things, rather than just water usage. For example, the type of service that is given, quotas of water distributed, rather than one individual person's complaint about service. As a possibility for handling this and avoiding further hassles in the future, maybe the whole thing should be under the jurisdiction of the state and the Public Service Commission. It is a big water district serving two different counties. The PSC does not at the present time have jurisdiction.

Mr. Prengaman: What is the 75%-25% based on. Is that population? Water usage?

Mr. Dini: It is arbitrary.

Mr. Prengaman: If you were to allocate on some basis, like 75%-25%, would you still need an arbitration board? Wouldn't it be fairly clear where the water was going?

Mr. Dini: That's a possibility. The biggest problem now is the allocation of hookups. There is a waiting list of people for hookups in Silver City. I think that Virginia City has an allocation of 12 new water permits a year.

Mr. Prengaman: Would you tell me which part is in Storey County and which is in Lyon?

Mr. Dini: Silver City is in Lyon County. Gold Hill and Virginia City are in Storey County.

Mr. Larry Wahrenbrock: I live in Silver City. One point I wanted clarified was whether or not the Virginia City Water District, as stated in the bill, is in fact the same as the Storey County Water Company, to whom I make my bill out. It might have to be changed in the bill to make it clear. Basically, the problem has been an inequitable supply. When we talk about hookups, as Mr. Dini just mentioned that there were 12 hookups allotted for Virginia City, there is a distinction between residential and commercial hookups. There has been no problem with anybody in Virginia City getting a commercial

hookup, although there has been a problem with people receiving residential hookups. I don't know if the Legislature should get down to those kinds of brass tacks within this type of legislation. The arbitration board is a concept that is well put in the bill and will allow for a relief valve for the people in the Comstock to go to besides the Storey County Commissioners, which also are the board for the water company. That's basically where the problem's been. Instead of trying to allocate a 75%-25% split or a 60%-30%, etc., some language that the Virginia City Water Company would serve all users within its service area in an equitable, I think, would be ample and sufficient for the legislation and then the board of arbitration would be a safety valve or a method by which people could take a grievance beyond the Storey County board, itself.

Ms. Lori Carpenter: I am a resident of Silver City. Historically, until about 1974, this system was served by a man named Hobe Leonard and it was called the Virginia City Water Co. At that time, they sold the water company to Storey County Water Co. In my experience, I applied for a water hookup and it took me 2½ years to get my hookup. In the meantime, water hookups were given in Storey County, but because we were on the other side of the county line, the Storey County Water Co. felt that because there is no defined service area in Silver City, we were put off. Many people were put off. It caused great stress and hardships because you have a great investment in your home and your property and you have to wait two to three years to build. Presently, there is no defined service area in the bill. Virginia City holds that its service area are the mains that they bought in 1974 that were in the ground. They say that they want to limit their growth in Storey County and that they have no limits to our growth and that is one way for them to do it. But our county is more than willing to come up with any kind of plan to limit growth. In three years, we had eight hookups and they had almost twelve a year, and I object to that. They come up with figures that we only use from 12% to 15% of the water. Those are unfair figures because they control our water use. They say when we get it and when we don't get it. We have no control over the Storey County Commissioners. We do not elect those people and we have no say in their governing body. The only recourse we have to go to our own county commissioners who really can't do too much because it is in Storey County. The county has been trying to settle this problem for many years since before 1974. It apparently has to be settled by some higher governing body. I would like to see them put under the jurisdiction of the Public Service Commission. We need some kind of fair system up there because we don't have one now.

Mr. May: What is the population of Silver City?

Ms. Carpenter: Approximately 160. We are metered for water usage. Last July is when I received mine after having waited for 2½ years. Lyon and Storey County Commissioners got together and finally just gave eight hookups. It was against what they originally decided, which was to not give extensions outside of their mains. So, what people had to do, was hookup to the mains and run their own line at their own expense. I am responsible for my line. I am responsible for paying for the meter and all maintenance. If there is a leak, I have to make the arrangements to get it fixed. After three years, if my line has had no leaks and my meter at my house and the one at the highway match up, the county says it will take the line over because they can trust it as being good.

Something has got to be done where we have some kind of authority in this matter. It has been really disheartening and there is not too much we can do. We have no authority and our county has none. Virginia City is definitely in the driver's seat.

In opposition, JoAnne McLachlan, Administrative Assistant to the Storey County Commission: The water company was purchased by Storey County in June, 1974 at a cost of \$293,000, plus expenses that have been incurred since then to try to upgrade the system to a minimally acceptable delivery system. The previous people testifying are accurate. There is no historic split of that water. It was allocated to the communities of Virginia City, Gold Hill and Silver City. Storey County does indeed administer, repair and maintain the total water system. There has not been a quarrel over quantity of water, but over service area. This holds true in both counties. The service area is of extreme importance due to the operation and maintenance. It has been determined to be the area currently served by the main line, which we bought and currently maintain. There is no difference in the treatment in Storey and in Lyon of applicants. If you are outside of the service area in either county, you are refused in the same manner. The one exception has been that the County Commissioners did set aside their own rules and extended water service to eight residential units in Silver City, which is totally out of the service area. Those people did indeed come to the main line and did extend their own lines. Now, after the three year period, that will mean eight more residents outside of the original historic limits for which we will be responsible. Storey County enacted a growth management plan which has been in effect nearly three years. It allows only thirteen residents per year in Storey County service district. The commercial applicants have been on an individual review basis by both the Planning Commission and the County Commissioners. In the last month, the County Commissioners have declared a moratorium on any and all future commercial development pending outcome of a total water system study. We have an application in to the Economic Development

to see if we can gain some kind of assistance in study money because the system is deteriorating. We admit it, but the company is not financially able to go in and totally replace that system. If this committee does consider a split and an arbitration board, perhaps, they should additionally consider allocating a proportional share of the initial cost to Lyon County and allowing them to pick up that portion of the original cost. It might be to the benefit of Lyon County for it to assume jurisdiction over its district and establish its own water company, making delivery of whatever allocation is decided upon to the county line and allowing Lyon County to administer, maintain and repair its own system. This would certainly leave it in the hands of its community and county commissioners. This was suggested by the Storey County Commissioners to the Lyon County Commissioners nearly a year ago. If Lyon had its own billing system, the Legislature may well be prudent in considering an additional capital outlay for total system improvement. We have a decided restriction in delivery system. Our water comes from Lakeview to the Cinder Pits in a 12-inch steel pipe. At the Cinder Pits, two miles before the five-mile reservoir, that line is reduced to an 8-inch steel line. Therein lies a definite restriction in the ability for the system to take on any more water. If we could enhance the size of that pipe, we could take on more water if you were willing to legislate it to us. We do not yet have a quarrel with quantity with Silver City. Every applicant from Silver City, meaning Lyon County, that has come before the Storey County Commissioners, applying for water hookup, if they have been within the service district, have been granted a water hookup, no questions asked. The only people who have been hassled, their term, are the people outside of the actual water service area, and that applies uniformly between the two counties.

No matter how you want to look at the water statistics, we do have them, the total system has serious problems. Our County Commissioners have indicated a willingness to negotiate with the Lyon County Commissioners on some kind of growth management plan for both counties, so that we can allocate the total amount of water that we currently have, which is 500,000 gallons. Up until now, there has been difficulty in getting the two boards together and certainly not by reluctance on the part of the Storey County Commissioners. However, there would be a storage problem for Lyon County. They have only a 3-inch delivery line into that community. You can only add so much demand on a 3-inch line before you find yourself out of quantity and out of pressure. So, the total system has some serious problems. As the two communities take a look at water supplies and future growth, we need some help. Neither community is wealthy enough to individually finance the improvement of this system and without additional improvement, we are pretty well linked to delivering the water the way we are. If we

mandatorily must split it, that system will have to be immediately improved upon and engineered so that we can assure the delivery of whatever the split is determined to be.

Mr. May: This really should be settled by inter-local government agreement between the two counties. You indicate that your county commissioners have offered to sit down with the Lyon County County Commissioners to try to work out something.

Mrs. McLachlan: Yes, in fact, approximately a year ago, the county commissioners of both counties did sit down in a mutually agreed on location in Silver Springs and discussed this very thing. The Lyon County Commissioners indicated that they would be supportive of discussing a growth management plan at a future date, and until that was done, they themselves would consider adopting the same kind of growth management plan, although their numbers could certainly be different...ours is developed to build out the community over a fifteen year period. It was designed that way so that we did not have an adverse impact on the school district nor our police and fire, or any of the social services inherent to population expansion.

Mr. May: Your commissioners have the source of the water itself. They own the system that brings it in from Marlette. They own the distribution lines. You have two primary industries - tourism and mining, both of those requiring water usage. So, if I were a Storey County Commissioner, I suspect I would give my first attention to those two instead of someone living down the hill. After we take care of our property interests up here, our sources of revenue for our county, then we'll talk to the people in Lyon County, if there is something left over, we'll talk to you.

Mrs. McLachlan: Storey County does indeed supply water to those very industries. However, the only industry that has equal status with our residential community is our tourist industry which consists of 85 business qualifying for commercial rates on "C" Street of Virginia City. Houston Oil was given the option of using excess water. If there was any demand for that water, they were the first company to be turned off. They are the first user out of the reservoir area and are the first to be turned off. That did happen. It became apparent that our usage over this past month and a half, because we are trying to upgrade and clean reservoir, the usage exceeded what we felt could be allocated to Houston Oil and they were turned off the system. The only water going to Houston Oil and Mineral would be for general toilet facilities. Their milling operation was turned off totally until we could adequately fill both reservoirs.

We have the ability to store nearly 300 million gallons in reservoirs. However, when you consider fire usage and just leak in the system, we are only 57% to 60% effective in the use of the water that is currently allocated to us. We are looking at 500,000 gallons allocation. But until we can get the leaks in that system plugged up and the system improved to deliver, we are only 60% effective. When you put the Houston Oil figures in, as far as their usage, you become far more effective because they are the first user off the line and that section of pipeline is good. But as it comes on into the community of Virginia City and then distributes on down to the Silver City-Lyon County area, that is where the deterioration has taken place.

Mr. Schofield: Did the county put a moratorium on commercial only?

Mrs. McLachlan: No. On residential. We do have a second ordinance in effect which says that any application for commercial usage must first be reviewed by the Planning Commission and their recommendation is passed on to the Board of County Commissioners for final review. At that point, the type of commercial application is looked at. If it is a gift shop which would only have a lavatory, that's one consideration. But, if it is a restaurant, and of course, we even have a limit on bars, so we are not taking on any new bars, or some type of business where the water usage is likely to be great, we scrutinize it more carefully. There is no limit, per se, except by individual commission review. This agreement to allow the extension of the system for eight Lyon County residents was truly out of compassion, rather than good judgment. Those people had been held up for anywhere from a year to two years before they could develop their property because of the reluctance of the county commission to expand this system. Now we have a system that is anywhere from 1,000 feet to 1,500 additional feet wider than it was. However, that concession has been given to Lyon Counties and has not been given to Storey County, nor is there any appetite to give that consideration to Storey County until such time as this water system can be engineered and improved.

Mr. Prengaman: At the time of purchase, was Lyon County offered participation?

Mrs. McLachlan: Storey County was bonded at the time and apparently Lyon County was not.

Mr. Bob Berry, Storey County Commissioner: As I recall, the purchase of that system was more or less an emergency and this was before the present development of the entire area. The

development has come since then. The water company was going out of business. The state had bought the primary water rights up in Marlett. Storey County was sitting up there on the hill looking at a very dry future. We had to do something. We went into a very fast emergency purchase of that system. But some of the things that were done at the time of purchase, we wish we could do over again. We were, frankly, taken in certain respects. We bought an antiquated system. The whole system leaks. There is iron pipe in there that has been there for 100 years. There are leaks in there that we can't even find. They go down into the mining areas down below.

Mr. Prengaman: You mention that you are willing to negotiate with Lyon County. In what respect are you going to negotiate - more like a joint operation of the system, or just allocation of cost - what are your parimeters?

Mrs. McLachlan: At the discussion a year ago, and prior to that, there were two ideas put forth. (1) First of all, determine what would be a fair allocation of the water. If you could just cut it off and say so many gallons to Lyon, so many to Storey. Lyon to assume responsibility and form their own water company. We would just run the water down the pipeline to the county line and from that point forward, Lyon County could administer their own water company, handle their own expansion and improve their own system. (2) To come to an agreement on a percentage of the water, which is academic, at best. We can agree to a percentage. Putting the system and the mechanism in place to insure that the water is split that way is where we are really in a terrible bind. It will take capital improvement to the system to effect that very thing. Those were the two options. There was no discussion at that time of quantity. We would just keep running the water down there until such time as there isn't anymore, then we are all stopped. There was great argument over rapid growth. Storey County planned their growth over fifteen years. There was no argument among the commissioners as to which community could or should grow the fastest.

For the purpose of review, Storey County is a 50% user. Lyon County is between 7% and 10%. Both counties are losing something in the neighborhood of 40% of the water.

Mr. Craddock: The system increased the storage capacity recently, did it not. Some of the reservoirs are recent. Was Houston Oil involved in this?

Mrs. McLachlan: The initial expansion was at the mutual agreement of Storey County. That is how the contract with Houston Oil and Storey County came to be. Houston said they would immediately finance a 500,000 gallon storage tank, in addition to the reservoir which we already have. In return, that tank could be paid back by Storey County at the rate of whatever the water district determined was fair and equitable against their bill. We would credit them whatever was equitable against their water bill until such time as that tank was paid off. There was to be no interest, carrying charge, they would fund the up front money, which came to approximately \$90,000.

Mr. Craddock: Did the state subsidize the water system with approximately \$165,000 in the last few years?

Mrs. McLachlan: That is not my understanding. Storey's initial purchase price was \$293,000 through a Farm Home loan - 40 year, 5%, but there has been no state participation in our system. Houston further participated by renting two additional 200,000 gallon tanks, an additional 400,000 gallon storage capacity that was granted to the system. By virtue of Houston's participation, we have an additional 900,000 gallons. The Arbitration Board poses a problem, unless, of course, Lyon does form their own company, and that is that it would consider two members: the Lyon County Commissioner and the State Water Engineer. I am not concerned with or directly involved with the financial stability of that company. It is well enough to arbitrate an increase in the service area, but you would certainly have to be in-depth involved in the financial operations of the company.

Mr. Berry: There is not an awful lot I can add to what Ms. McLachlan has already told you. In regard to her comment about the percentages being academic, we have an allotment of 500,000 gallons per day. That is the maximum amount we can get from the state. Mr. Dini was instrumental in getting an increase to that figure at the last session of the Legislature. Unfortunately, because of the restrictions in the system, we now can obtain 364,000 gallons. That is all that water system can bring to us. Our Water Master has checked that in the last couple of weeks and we can get full flow through the system out of the (Jumbo) reservoir of 364,000 gallons. We apportioned that at 25%-75%. 125,000 gallons would go to Lyon, leaving Storey County 20,000-25,000 gallons. You have 160 people in Silver City. There are a great many more in Virginia City. If you look at that proportion, it would be 6% to 7%. We admit that is too low for Silver City. 25% is a high figure. When we were considering this last year, we reached the figure tentatively for Lyon County of 12%-15%. The use figure now is around 10%. The 12%-15% included a growth factor which is approximately the same as the growth factor we figured for our

own area. We are not penalizing Silver City as some people seem to think. We are trying to develop the whole thing for everybody. I have a suggestion along the lines of what has been done in the past, and that is, that Lyon County form a water district which could then purchase water from Storey County. We have replaced pipes in Silver City, just as we have done in Virginia City and Gold Hill. They would then be a customer. My suggestion is the 12% to 15% allocation that we have, through a lot of research, arrived at as a fair figure. That would leave them their own growth. They could issue water permits, housing permits, whatever they wanted. If they wanted to consume the water all in one year, it's O.K. with us. That would be their problem. We are trying to spread it out over fifteen years. We are trying now to figure some plan of financing an increased flow of water. We have an 8-inch pipe that chokes our delivery. Unfortunately, two miles of 8-inch pipe is an expensive proposition to replace. If we can figure some way of financing the replacement of that pipe, another 8-inch pipe or, perhaps, a 12-inch pipe, to increase our capacity to deliver, it would help. We would then be able to take the full 600,000 gallons. To get more than that, and it has been indicated to us that there is a possibility of getting a further allocation from the state, we would have to put an increased invert side from across the valley, which, of course, would be a terrific financial impact. We are trying to get some sort of a subsidy from the government on that. If we can do that, we would like to have joint cooperation deal with Lyon County. I would like to comment on the young lady who indicated she had to wait 2½ years. Part of that was because of the moratorium we put on any permits for residential building. That moratorium was also on Virginia City and Gold Hill.

Mrs. Laura Del Carlo, a resident of Storey County: I have served on water committees and I know the problem. Water is our life line. I was a Storey County Commissioner until the first of the year. Hobey Leonard was the original owner. The Public Service Commission was upset with the way it was being handled and Hobert offered it for sale. We originally had an undue amount of water and he was selling it off, and he was not repairing the system, and people were complaining. When we met with Lyon County about a year ago, we offered them 15% of our water that was allocated. It was determined that of the 500,000 gallons, we are only getting 364,000, or 60%. If Lyon County gets the 25% in this bill, we are as good as dead, because that is 25% of 364,000 gallons. Part of the deal offered Lyon County, was to take over their system, but they were not interested. They said 'definitely, no'. We control the water, but we also maintain it and we give them the equal consideration we give the people on the hill. We also maintain their fire hydrants. Everytime we raise the rate for

water, which is the same for both counties, it has to go through the FHA, as it is a revenue bond and we have to pay back the amount that we borrowed from the FHA. The payback is included in the water rate, besides having to maintain everything and pay for the water. So, where they think that we are giving them the bad end of the deal, they are getting the best end of the deal. They have nothing to do with maintaining it, nothing to do with setting up the rates and satisfying the FHA. As far as setting up the original lines, we bought the transmission lines from Hobert Leonard, which we said we would keep intact.

Mr. DuBois: If the allocation was increased to 25% from the current 7% to 10%, for Lyon County, what would be the effect? Would this create the possibility of a moratorium again in Virginia City? Would this give Lyon County the supply that they need, but create a situation in Virginia City where they would almost have to have a moratorium?

Mrs. Del Carlo: Certainly, because the way it is set up now, we have 500,000 gallons, but with our transmission lines, we are getting 60% to 70%, which in round numbers is about 360,000 gallons out of the 500,000. If you give Lyon County, which is at the bottom of our line, we would only get the 364,000 at the top of the line to serve Virginia City, of which 25% would be allocated to Lyon County. We would be getting only what was left after 25% was taken from the 364,000. The whole problem resolves around the transmission lines. We have the allocation but we can't get it through.

Mrs. McLachlan: It is my understanding that somehow Storey County was allowed to insure that debt without the benefit of revenue bonds. It is a straight county bond and not guaranteed.

Mr. Dini: There is no bond in state law like that. What kind of bond is that?

Mrs. McLachlan: It is an out and out loan. It is not a bond. Storey County secured the loan, but we cannot find that it is guaranteed by revenue bonds.

Mr. Archie Blake, Assistant District Attorney, Lyon County: I would like to clear up a few misconceptions. It has been stated that the Silver City residents of Lyon County have really nothing to do with the mainenance, setting the rates, and, therefore, have no interest in this system. That isn't quite true. The Lyon County residents pay the utility rates, just like everyone else does. The system is just like any other utility, whether it is under the Public Service Commission, or other municipal ordinance. The debt service, the cost of

and expenses of running that system are taken care of by the rates, by the rate payers. They do it. The Virginia City people are just the owners and they have responsibilities as owners, just like everyone else. If it is Sierra Pacific or anyone else. There is a real misconception over the service area and this is what the fight is basically all about. As an example, if Sierra Pacific had owned the water system in Carson City in 1974 and they said they were going to limit the service to just what the mains were at that time. What would you have right now in Carson City? You would not have an Arrowhead Drive out by the airport. You wouldn't have anything out by Medium Security or Stewart. You wouldn't have anything out on Long Street, where those big new houses are west of town. You wouldn't have any of that. And, you don't have any of that now in Silver City. When the first allocations from the Marlett System were first introduced, it was to serve Virginia City, Silver City and Gold Hill. Not parts of Virginia City, not parts of Gold Hill and not parts of Silver City. When the Public Service Commission relinquished the control of the system and o.k.'d the sale to Virginia City Water Company, that's still what it said: you will serve Silver City, you will serve Virginia City and Gold Hill, not parts of Silver City. And, that is what it is all about. The people here have been testifying that they are within the city limits of Silver City. The city limits are not unreal. They don't go all the way to Highway 50. There has been a real misconception about the part of Lyon County Commissioners, and what part they played in this. I have attended the Storey County Commission meetings a number of times with Lyon County Commissioners on regular commission days. I can't recall all of the Storey County Commissioners showing up down in Yerington to discuss this problem. A lot of good work was done about a year ago when the commissioners met to approve eight new hookups. I'm not too sure it was done out of compassion. I think that everybody realized that other guns were going to be brought into force if something was not done immediately for those people who had been trying to be hooked up for a number of years. Everyone of those eight people were within the service area. Not service area as defined in my opinion incorrectly by the Virginia City Water Company, but within the service area. They were within the Silver City city limits. Maybe the words 'out of compassion' are the operative words here. Lyon County wants equal and fair treatment for those water users in Silver City. That's what they are after. Why should they have to beg? Why should they have to wait? Why should they have to wait for compassion for the county commissioners of another county to do them a favor and allow them to hookup? They have certain rights. The initial attempt to make a deal concerning this system and the two counties came from Lyon County. I happen to know that because I wrote it. The deal was that they would give 25%; that Lyon County would take over the system at the

county line. That was summarily rejected because they wanted 15% and \$50,000. You have heard today and we have heard over the years that Lyon County and the Silver City area is nothing but an expense, a heartache, a headache, a pain, and they would be better off without it. But when Lyon County offered to take it over, suddenly it became a very valuable asset. We have been trying to get this thing settled and and I think we have all been dealing in good faith, but it hasn't seemed to work. Being at this hearing here today and having this bill, I don't want to say, last resort, but it certainly is one that needs to be put before someone who has more power than what we do. As far as the growth control, I think that Lyon County would be very open to having a water district growth control. As a matter of fact, they have, a number of times, brought that up, that there would be no problem in limiting growth in the area.

Mr. Craddock: Do you think the water company made a mistake when they got Houston Oil involved in the storage capacity?

Mr. Blake: I think that is a tough question. Politically, it doesn't sound very good, but, practically, the way it has been handled, to my knowledge, there have been no detrimental effects to the system and I don't think that there are potential detrimental effects to the system.

Mr. Craddock: How would you suggest they go about paying them back for the storage cost of the reservoirs?

Mr. Blake: I don't know if they are going to pay them back. I don't know any of their financial agreements.

Mr. Craddock: They have already cut them off.

Mr. Blake: The agreement, the way I understood it, between the water company and Houston Oil was that if there is water available, they would get the excess water. There is no sense in just letting it sit or evaporate up in the reservoirs.

Mr. Craddock: I'm looking at additional allocation potential and places and the ability of the company to respond to their obligation as it relates to the additional storage capacity.

Mr. Dini: It was a political decision by the company to donate new tanks and that improvement to clear their image in the community.

Mr. Craddock: They have some obligation to give additional water and then they turn around and make additional allocation elsewhere.

Mr. Dini: The contract they have says that if there is a surplus, Houston can have the water. It is a continuing condition.

Mr. DuBois: In view of the extreme limitation of water in the three cities, don't you feel that jumping from 7% to 10%, the current allocation, to 25% would cause an extreme hardship?

Mr. Blake: I don't think that it is 7% to 10%. What they are referring to is that of the water that does not leak out, they use about that percentage of the usable water. I don't think that the 25%, if indeed it came to that, is going to happen today and won't for quite a while. Virginia City regulates its growth and Silver City could then regulate its growth, too, to stay within those parameters. Silver City certainly has the right to expand. They are not going to jump from whatever they are getting right now to 25%, just as Virginia City does not use 75%.

This concluded the testimony on AB-661.

Mr. Dini appointed a subcommittee comprised of Mr. May and Mr. Schofield. If there are other remarks to be made, they can be addressed to the subcommittee.

The next bill to be heard to be heard is AB-663 - Revises certain statutory provisions concerning certificates of appropriateness and placement of mobile homes in Comstock historic district.

Mr. Dini: This bill was brought about by a request from the district itself and the bill draft did not come out properly. The main thing that the Historic Commission wanted was on Page 2 of the bill, Line 20: "The commission may charge and collect a reasonable fee for issuing the certificate." How the language on Lines 41 through 49 got in there is beyond me because it is not in the request that I gave the bill drafter. He must have misinterpreted something I put in there. The other one was on recreational vehicles. Presently, there is a clause that says: "no house trailer or mobile home can go in the district", and this bill says: "except a recreational vehicle", which was in the original request. So, I think what we ought to do at this time is have someone from the Commission who would like to speak to the things they wanted in the bill. I understand that there is a lot of opposition from the people in the area regarding Lines 41 through 49.

Mrs. Mimi Rodden: Both the Commission and the Historic Preservation and Archeology office would like to see Lines 41-49 entirely deleted as it was an error, as I understand it. The

other question was that in Section 1, Subsection 8, opens the way for the random placement of trailers within the district - the Comstock Historic District, or any other district, perhaps. Presently, we are concerned with one district. This is certainly a conflict with the intent of NRS-384 in its entire form. It conflicts with the historic character of the district. NRS-384 as presently evidenced in law, provides for a mechanism through the joint agreement of either county board of commissioners and the Historic District Commission to provide a historic trailer overlay. So, there is a mechanism for trailers to be placed in the district, if it is the joint wish of either Lyon County Commissioners and the Commission, or the Storey County Commissioners and the Commission. It certainly has been proven over and over again through the study done last summer that indeed recreational vehicles should be allowed in the area. This is not a question that has been worded in any way. It is something that needs to be developed and both the state office and the Comstock Historic District Commission encourage the proper placement and design of a recreational trailer area. It would be good for the economy and good for the state. It would keep people and families in the area. There is not enough lodging now and people do travel in RV's and campers and this would be most appropriate. It can be designed so that it is compatible. There is no question at all there. But the placement of trailers, either in a park in the core area or the random placement of trailers in the district is completely incompatible with the charge of preserving and encouraging the flavor of the historic comstock area. The area that is of greatest concern, I think, was the deletion of the Historic District Commission's authority in having to arbitrate through the County Commission Board and will simply not work in this area.

Recently, we had an application for an RV park, actually, it was a mobile home park, initially. It was denied by the County Planning Department; the Planning Commission is chaired by the County Building Inspector and on that commission are six county employees. It was denied at that level. It was later denied at the County Commission level. It was denied by the Comstock Historic District Commission at their meeting. Assemblyman Dini, Senator Getto and Senator Jacobsen were there at that meeting. The party applying for the trailer park was encouraged to develop an RV park, if that was possible. In fact, they do have a precise section of land that they are interested in developing in this manner. The land is relatively close to "C" Street. It is in that area that we call the core area. It is located between the hospital and Main Street. RV parks would be fine in that area, properly landscaped and developed. The Commission feels strongly that mobile homes are simply not compatible. We stand on that.

Mr. Schofield: By the deletion of Lines 41-49, it would straighten out this particular portion of the bill? And is the wording on Line 5 added language?

Mrs. Rodden: That is added language. We do not support the deletion of 'house trailer' or 'mobile home'. There is a mechanism under present law that provides for the implementation of that kind of placement and we feel that the present law is a good law and it need not be changed. There is a provision here that allows for the Commission to collect and accept fees for certificates of appropriateness and things of that nature. Historically and traditionally, the previous and the present Commission have charged for this service. It is build into our budget. We have, however, never been given the legislative authority. I would ask that you keep that in, because we would like to clear that up.

Mr. Robert Simpson, current chairman of the Comstock Historic District Commission: I don't want to muddy the waters, but I would like to address that portion that deals with the appeals process. I realize that it is very difficult for someone who wants to appeal a decision that the Commission has made to reach the district courts and go through that procedure for appeal and recognize the necessity for some kind of process that people do have access to. It's my opinion that it would be wise to set up some kind of appeals board that people do have access to. How that could be structured, I really don't know. I would think that it would have to be an impartial assembly of residents of the district, probably appointed by the Governor. The reason for our need for the collection of fees is rather obvious. We are in a position of being policemen up there because we don't have adequate budget to be able work with those that are putting projects together in that area and that is something that we would like to get into. But, it has to be funded.

Mr. Jack White, Past Chairman and member of the Storey Planning Commission: My comments will not be directed to the bill, but rather to the effectiveness of the Commission as it presently stands, with the thought that if a bill is further endorsed, certain corrections or additions or strikes should be entered into that bill. Although the goals and the intent of the Commission, both past and present, were in the best interest of preserving the uniqueness of the Comstock area, it is quite evident that the Commission has been virtually ineffective under its present rule and operation procedures. You have only to make a trip from Carson City to Virginia City to observe the octagon-shaped multiple faceted dome, multi-colored monstrosities that have been built and are being built today in the so-called historic district to realize how ineffective this Commission has been to allow such things to proceed within the historic

You have only to visit Virginia City and see glass additions to old historic buildings that are being built under the guise of energy-saving, to see how little control and how ineffective the Commission has been. These are buildings which are readily visible from "C" Street, or the center of town, as people refer to it, and certainly do not fit into any historic district, in any manner, shape or form. You have only to look at the semi-flat roofed overhanging parapet building that is the latest addition to our school system. It is not in any way similar to the other buildings in the school district, and is not in any way correct in the historic district. I recognize that the school district probably had some bearing on this, but certainly if the Commission were effective, it would have prevented such monstrosities, and that is one block from the center of town. It is visible to anybody that lives in Virginia City. It is certainly not historic. I could go on for some time pointing out these glaring departures from good design and common sense. I would pose this question: The Commission apparently feels that these monstrosities are in keeping with the area but does not feel that a housing project over one-half mile from the center of town, down Six-Mile Canyon, barely visible from "C" Street, if at all, would not be in keeping with the necessities and requirements for the city. If we have this Commission, if should be strengthened to such point that they can police properly, control properly, the historic district for which they apparently are supposed to have control.

Mrs. Barbara Bowers, Virginia City: First, on some of the statements that Mrs. Rodden made. This was approved by our Planning Commission. It was not denied by the Commissioners and it cannot be seen from any place in town, even from the south side of the historic hospital.

Mr. Dini: You should really speak to the bill or the concept, Mrs. Bowers. I don't think this is an arbitration over the trailers. If you think that we should have the appeals process in the bill, or you felt that the way the board is set up now... actually there are three pertinent things in the bill. One is about recreational vehicles, the other one is the provision that the Commission may charge and collect a reasonable fee for issuing the certificate, and three, the appeals procedure, which I think you are interested in, in being able to appeal to the County Commissioners.

Mrs. Bowers: Our County Commissioners are elected by the people in our county to govern our county. The Historical Commission is appointed by the Governor. They have more authority than our Commissioners; they have to answer to no one. The only recourse the people have is all this bureaucratic red tape. It seems that this is somebody's pet project that they are trying to keep in, because they don't listen to the wants or the needs or demands

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of the people in Virginia City or the historic district. I did some checking on housing yesterday and to finance a \$50,000 mortgage, the payments are almost \$600.00 a month for thirty years, and at the end of thirty years, you are paying \$213,000 for a \$50,000 low-income home. People can't afford it nowadays. I know our children won't be able to afford homes. Some people can still afford mobile homes and they are denying the people a right to own property and what they can afford to live in. I know that Houston Oil and Savage Mine employ 122 people that don't live in our county. They live elsewhere. Out of those employees in a month, \$182,000 goes right out of Virginia City without one dime being spent because there is inadequate housing. As far as the mobile home park, an RV park, the area that we had considered to put it in would cost \$200,000, roughly, and who is going to invest \$200,000 depending on just RV's for maybe five months out of the year. And, at the rate gas is going up, you can't depend on them much longer.

Mr. Dini: These are the phone calls I received yesterday against the bill. As a matter of record, we have a letter from the Virginia City Highlands Property Owners Association opposed to AB-663. Mr. Mark Schrader, President. We have a letter from Mr. John Schaeffer, a member of the Commission opposing AB-663. They will be entered in the record

Ms. Elvira Kilbaugh, Virginia City: I would like to ask one question. Under the present law, can anybody come into Virginia City, put a trailer on their property and leave it there if you should go to court about it, would it be legal for you to put a trailer there as it stands, and is it true that if you have a trailer overlay, where people can park, then you can keep them from building all through the town?

Mr. Dini: The law prohibits a house trailer from being put into the historic district. It is in the state law.

Person from audience: ...Virginia City Highlands on whom the majority of the Historic Commission's time is spent, what right have you to appropriate monies from the taxpayers of this state to police a non-historic private subdivision?

Mr. Dini: I don't think I can answer that question. But, I'll tell you this. The people of Virginia Highland wanted to get out of that district two years ago and that's why we changed the law, so they could get out. We provided in the law that they could petition the Commission and the Commission could set new boundaries and after they did that, they came and said they wanted to stay in the district.

*Exhibit A

Mrs. Del Carlo: I would like to comment against the idea of the Commission being able to charge and collect a reasonable fee for issuing the certificate. Who sets the reasonable fee and is there any bounds for what it is to be used for? My conception from the people I have talked to is that they would be willing to pay a reasonable fee if they knew what the money went for. They do not want to pay it to increase the Historic District's salaries or to do any building on any present buildings. What they would go for would be for restoring the Fourth Ward School or the hospital; they would like to know where the money is going, they do not want to pay a fee for certificate of appropriateness to paint a piece of your fence and then the money goes directly to increase salaries or pay salaries of the Commission. They would rather it go into a fund to restore one of the buildings in Virginia City and have something to show for where their fees went.

Mr. Dini: They can't spend it unless they have the money appropriated in the state budget. The fees they collect go to the State Treasurer and will be appropriated by the next session of the Legislature. It goes in the state General Fund. As far as returning the fees, under the Administrative Procedures Act, 233B, they would have a hearing at the state level. It only amounts to less than \$1,000 for two years.

Mrs. Del Carlo: We understand that they are doubling the fees and people resent the fee they are paying now to tell them if they can paint their fence or not. I'm representing that opinion that they want to know exactly where it is going to show something for it, historically.

Mr. Dini: You are saying, Laura, that if they want to restore the Fourth Ward School or do something like that, people up there will support that, but wouldn't support using the money for salaries.

Mrs. Del Carlo: Or using it to build on to the telephone office. Members of the Commission do get a salary of \$40.00 and mileage and dinner, and also, the Building Inspector is paid mileage and repair on his car.

Mrs. Rodden: No, he is under contract with the agency. He doesn't get anything extra.

Mrs. Del Carlo: He doesn't get any repairs any more? It's been changed?

Mrs. Rodden: Yes, they changed that.

Mr. White: Part of the bill calls for in relation to mobile homes, a joint agreement of the Historic Commission and the County Commissioners as to issuing or denying a certificate on a mobile

home. Later on in the appeal process, it calls for appeal to the County Commissioners. I oppose this situation. The mobile homes situation comes before the two boards and they either deny or issue the certificate. That is, the County Commissioners and the Historic District. Then the one who is denied appeals and that person is going to hesitate to appear before the County Commissioners because the commissioners have already pre-judged that, or have judged it once. Would it be possible, perhaps, to amend the bill in some instance to change the appeal procedure as to the mobile home deals only. Perhaps, have them go directly to District Court.

Mr. Henry Bland: We received a petition from a large number of people so it is obvious that the people in our community are not happy with the situation the way it is. So, I think something should be done. The bill now reads that the Commission and the Commissioners must agree, but it doesn't say what can be done if they do not agree, so there would, obviously, be a court battle. There is probably a majority of the people who are not happy with the situation the way it is. I hope that there is something that can be done. I am not sure that the appeal to the Commissioners is the best answer. I don't know of another one. I, frankly, hate to get into these kinds of battles, but I would accept the responsibility, if the board saw fit to leave that in the bill.

Mr. Dini: If your Growth Management Plan allows only so many hookups a year, anyway, of water, is there an exception to that?

Mr. Bland: Yes, that is thirteen residential hookups and commercial hookups to be considered by the Planning Commission and the Commissioners on an individual basis.

Mr. Dini: Is that a fifteen-year build up?

Mr. Bland: I believe it is, yes.

Mr. Dini: Are there any years where you have not had the thirteen allocated?

Mr. Bland: We are behind now, although we are going to fill out this year. I do believe we had a few left over from last year.

Mr. Dini: It really isn't that much greater?

Mr. Bland: No. We have problems with water that will control our growth. We feel that there is a need for mobile homes. Perhaps, a need. I'm not going to say that there is a definite need. The mode of pay in Virginia City is light. They are working in restaurants, casinos, and a lot of them don't make

\$700.00 a month. There is a need for low-cost housing. As a matter of fact, they are living in those little shacks above and in some of those old buildings. We made a survey several years ago for locations. We had a committee that went out seeking locations to, perhaps, put in a mobile home park, or something of that nature. Each time, the locations were not satisfactory; even though they were back in the hills, the property owner next door objected. So, location is of prime consideration, there is no doubt about that. I've always had the feeling that if it was out of sight in Virginia City, perhaps, we could work something out. So, maybe that will give you an insight into how I feel about that. There is a tremendous need to prevent this impasse that is going to happen.

Mr. Don Fowler, teacher of historic preservation law at the University of Nevada, Reno: In thinking about historic district ordinances around the country in other states, the most equitable way is to have some sort of citizen's appeal board, as was suggested, because the County Commissioner is right. If you do it the other way, you are going to get into an impasse, which is going to end up in court, anyway. If there is some way to have a citizen's appeal board who can handle these kinds of issues, it would be of great help in terms of solving a lot of problems up there.

Mrs. Rodden: Last Monday, prior to our general Comstock meeting, we had a work session and we talked about this very same problem. The appeals board, I think, is your answer, if you will consider it. It takes it out of the expense of court process, which is intimidating and costly. I am sure that this can be worked out. The mechanism in the legislation that we have used today provides for the implementation of trailer parks, if this agreement can be reached. So, there really isn't any problem there. The vehicle is there if they want to use it. The law provides for that alternative. The appeals board that was suggested, however, would be a party of, perhaps, three people, one representing each county commission and the Comstock Historic District Commission. A small board that would take it out of the political arena. If you throw it back on the County Commissioners, you are not going to keep everyone happy. The appeal board would be a possible solution.

Mr. Mello: There was a gentleman who testified that some of the architectural design did not fit in the Comstock Historic District. Can you explain that to us?

Mrs. Rodden: Yes, I am critically aware of the places that Mr. White was possibly referencing. Directly behind the Catholic Church, the property was recently purchased and they have, indeed, put on an appendage to the building which is solar oriented.

I think that we have to realize that our lifestyles are going to be changing with the rising costs of utilities and solar is something that we probably will all come to eventually, some form of passive, collective additional heat.

Mr. Mello: Oh, I understand that, but how is that of Comstock Historic value? I don't think they had those back in those days.

Mrs. Rodden: No, but they also didn't have toilets and a number of other things. We have to grow with the times.

Mr. Mello: But, the toilets aren't out in the open, are they?

Mrs. Rodden: No, but I can tell you that the design of this house, the appendate to this structure, which is an Italian (A) structure, with a modern addition to it, is in good form. You would have to look at it to understand. There are some houses on the truck route that are not completed, that are not painted out yet and one of them has a varied colored roof. It is very unsightly. On their certificate of appropriateness, by the time that is completed, it will be painted out.

Mr. Mello: What I am getting at is, if you are going to stay within the architectural design of the Comstock Historic District, and you want to stay, you should. If you are going to deviate from it, then I think we should look at the mobile homes. You want both sides, you want the mobile homes, but you can allow buildings that don't fit within the mode of the historical preservation plan.

Mrs. Rodden: Most people's concept of proper design for a historic district is to replicate everything that was there before. Replicate is to mimic, if you will, and redesign new houses that look like old houses. This is not really our philosophy. Our philosophy and our training has taught us that things should be compatible in scale, in height, in size, in mass, but you don't always make things look old. Modern additions to older things are most acceptable in the field. They truly are. This is something that lots of people don't understand, and they may not agree with.

Mr. Mello: The people in that area really depend on tourists, do they not? Tourists go to that area to see the way that people used to live. They did not live in solar energy type houses or businesses. So, I think that you are starting to get away from why the Commission was created.

Mrs. Rodden: Well, addressing the trailers once again, there is a mechanism for trailers to be placed in the area, if they simply use the law. The question raised recently was the

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placement of one specific trailer area. It was too close to the core area.

Mr. Mello: I have also heard some testimony of the architectural design which does not fit in the district.

Mrs. Rodden: I will defer to Mr. Simpson on addressing architectural design. He is an architect.

Mr. Mello: It sounds like some people like their cake and eat it, too.

Mrs. Rodden: I'm sure that they do.

Mrs. Margaret L(outher), resident of Virginia City I am very aware, from a business standpoint, how important it is to maintain the historical aspect of the area. I am also personally aware, as well as many other people are, about housing today. I recently wrote Mr. Dini a letter and told him of these experiences. I would just like to read it to you. "...Mining is the real historical aspect of this area and not the buildings. Did you ever try to borrow money to buy a house in Virginia City? Now, we have been told that this is the historic gem of Nevada and that all Nevadans are interested in this area, but without asking you what you do for a living, how much money you make, how you are going to pay back the loan, what your name is or where you come from, if you tell any banking or loan and savings company in Nevada that you are buying a home in Virginia City, and you may be buying an old one, so you can restore it, maintain and preserve it, they are not even interested in you. Your boat sank right there. Nevada companies are not interested, so the bank tells us, in investing their money in Virginia City. The bank says: we do not loan the money, we only make out the loan and the investors buy the loan. But, they'll loan you money to buy a mobile home. They don't care where you put it. They care that you have the mobile home, they want to see that it exists before they loan you the money. But these people that are so interested in the historic area of Virginia City will not loan you money to buy there, and that's a fact. I stumped Carson City to restore the stained glass windows in Virginia City, because that happened to be my committee area. One committee man who worked for the state, could not sell his tickets, so he bought them himself. Another man that lived down here, sold \$40.00 worth of his tickets and he bought the rest himself. I went to all the casinos in the area. There was very little interest.

Mr. May: Is the reason that the banks are reluctant to loan money on a permanent dwelling in the Comstock area is because you only have surface rights to your property?

Mrs. Lowther: They give you several answers, Sir. One of them is that we have a volunteer fire department, or, it's because of the mining rights. Or, because of the historic district. You get all kinds of answers. But they are willing to take your application if you want to apply and take your \$200.00 and they will go up and assess your property. But what happens between then and getting the money, is something else.

Mr. Dini: This will conclude the testimony on AB-663. I don't know if we can salvage any part of this bill, it is so late in the session. I am, however, going to have three people who are, I feel, very competent, to separate the wheat from the chaff and maybe we can help restore some confidence in the Commission. Mr. Mello, Mr. Nicholas and Mr. DuBois will be the committee to study this from the testimony we received and see if we can do anything with it.

The next bill to be heard is AB-669 - Establishes position of governor's assistant for special matters affecting Spanish-speaking community.

Assemblyman Thomas J. Hickey, Dist. #18: This bill is requested by the Hispanic community and the Latin Chamber of Commerce. What this would do is place an assistant for special matters affecting Spanish-speaking community within the Governor's office. It is modeled after a California plan which has a special assistant in the Governor's office relating specifically to those problems within the Spanish-speaking community. I urge your consideration and at this time, I would like to turn it over to Gilbert Flores.

Mr. Gilbert Flores, Latin Chamber of Commerce consultant: There are approximately 25,000 Hispanics in the Reno-Washoe area. There are 46,000 in the Las Vegas area and here in Carson City, we have approximately 2,000. The problem is not to take care of the Hispanics, themselves, in social work, but the situation is to get them into the economic base of the community. By having a representative in the Governor's office, through the Department of Economic Development, we think that this person would be able to help greatly in bringing about people in the community, as well as industry, tourism and employment.

Mr. Redelsperger: What is the fiscal note on this?

Mr. Mello: The first year, \$32,074, the second, \$33,744, to be spent mainly in salaries and office equipment.

Mr. May: That comes out to less than \$1.00 per person and, perhaps, \$.50 per person, statewide.

Mr. Mello: I'm not sure what the role would be of this person, but, would one be to see that the ballot is printed in Spanish?

Mr. Flores: That isn't a big problem with us, anymore, Sir. We fought that in court and we agreed with the Secretary of State, who preferred not to have it in Spanish. We, naturally, would for those who have a limited use of the English language, but we are now in the process of having ESL (English as a second language) as a strong basis for not having the need for of a ballot.

Mr. Mello: I am glad to hear you say that, because I feel the same way. We have a lot of minorities living in the United States today in many areas who choose to have the ballot printed in their own language. When you live in this country, you learn to speak the language.

Mr. Flores: We are also staying away from the bi-cultural studies, also. There are still some die-hards, but the majority of us have set that aside. There are approximately, state-wide, 65,000 to 70,000.

Mr. DuBois: Gil, your direction would be to move these people into the economic mainstream?

Mr. Flores: Yes, this would be placed under the Department of Economic Development, not in Human Resources, Welfare, or any of those.

This concluded the testimony on AB-669.

The next bill to be considered is SB-163 - Provides for urban subdistricts within water conservancy districts.

Mr. Roger Tegler: representing the Truckee River Meadows Water Users Association: This was a very complicated bill and it was getting into ad valorem tax and I just couldn't see the sense of it until a complete study had been made. SB-163 is a simple bill. In the past, the developers have not understood the problem, because what is happening is that they develop along these ditches which become dumping ground for the people who live along side of them. The farmers have to keep cleaning them up and they have come to the point that they cannot stand that kind of an expense anymore. As they develop, they abandon these ditches which have been used for drainage purposes. When property is purchased and the ditches are closed off, people up above who have been using it as a drainage, then flood somebody else. It is time that Washoe County and the Legislature give them some authority to conduct a survey and develop a plan to prevent a problem that is going to be insurmountable in years to

come. In the last bill, you may recall, they were talking about a \$30 to \$40 million program. I think before we spend that kind of money, we have to make a complete study and come up with a plan and present it to the Legislature two years from now. I hope that you will give SB-163 some serious consideration and set up a committee so we can solve the problem. At the present time there is a \$243,000 fund being used for the purpose of flood control. That money can be used by the City of Sparks or Reno, and it is paid back on a five-year deal. The original bill was premature because there was nothing planned. They really haven't gotten into the teeth of what the problem is. Reno and Sparks don't know what a mess they are going to be in if we get some wet years. There have been individual studies, but never coordinated between Reno and Sparks. The problem will never be solved unless the entities do it together.

Mr. Mello moved a DO PASS on SB-163, seconded by Mr. Nicholas. Motion carried.

Mr. Dini adjourned the meeting at 10:30 A.M.

Respectfully submitted,


Lucille Hill

A letter from Mr. Mark J. Schrader, President of the Virginia City Highlands is attached* indicating the association's opposition to AB-663.

*Exhibit A

ASSEMBLY GOVERNMENT AFFAIRS COMMITTEE

GUEST LIST

Date May 21, 1981

P NT

<u>PLEASE PRINT YOUR NAME</u>	<u>PLEASE PRINT REPRESENTING:</u>	<u>I WISH TO SPEAK</u>		<u>BILL NO.</u>
		<u>FOR</u>	<u>AGAINST</u>	
R. M. 106 C	SELF		X	
A. M. [unclear]	STOR 1 Co	X	X	
[unclear]	Self			
[unclear]	"			
[unclear]	"	X		
[unclear]	"	X		
[unclear]	MANUFACTURED Hsg. Div		X	4
[unclear]	[unclear]			
LARRY WARREN BROCK	CITIZEN	X		AB64
[unclear]	[unclear]		X	AB663
[unclear]	COMMERCE		X	bb 670

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VIRGINIA CITY HIGHLANDS

PROPERTY OWNER'S ASSOCIATION

P. O. Box 686
Virginia City, Nevada 89440
(702) 322-0386

May 19, 1981

Mr. Joe Dini, Chairman
Governmental Affairs Committee
of the Assembly of the State of
Nevada
401 S. Carson Street
Carson City, Nevada 89710

Dear Mr. Dini:

On behalf of the 1165 Property Owners that the Virginia City Highlands Property Owner's Association represents, we ask that Bill AB663 be soundly defeated.

Our development which is within the Comstock Historical boundry has battled this proposal for mobile homes and trailers before and will continue to do so in the future.

The Virginia City Highlands Architectural guidelines does not allow mobile homes much less mobile trailers and parks.

Unfortunately I am unable to attend your scheduled committee hearing on this bill but I hope this letter will amply express our strong feelings and concerns.

Respectfully,

Virginia City Highlands
Property Owner's Association

BY:


MARK J. SCHRADÉE, President

MJS/jh

Exhibit A 2383