



# Memorandum

**Date:** April 23, 2026

**To:** SOUTHERN NEVADA DISTRICT BOARD OF HEALTH

**From:** Daniel Isler, PE, REHS, *Environmental Health Engineer/Supervisor* *DI*  
Daniel Burns, PE, REHS, *Environmental Health Engineer/Manager* *DB*  
Chris Saxton, MPH-EH, REHS, *Director of Environmental Health* *CS*  
Cassius Lockett, PhD, *District Health Officer* *CL*

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**Subject:** Variance extension request for an existing septic system located at 4130 and 4140 W. Dewey Dr., Las Vegas, NV 89118 to remain split across two parcels

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## I. BACKGROUND:

Ernest Moody (“Petitioner”) is requesting an extension to a previously approved variance to obtain approval for a Tenant Improvement in accordance with Section 3 of the *Southern Nevada District Board of Health Regulations Governing Individual Sewage Disposal Systems and Liquid Waste Management* (“SNHD ISDS Regulations”) and to allow future building permits to be issued for the properties located at Assessor’s Parcel Numbers (APN) 162-30-801-009 and 162-30-801-010, also known as 4140 W. Dewey Dr., Las Vegas, NV 89118 and 4130 W. Dewey Dr., Las Vegas, NV 89118, respectively (collectively the “Subject Property”).

Petitioner requests a variance from Section 3.7 of the SNHD ISDS Regulations, which states that a “Tenant Improvement approval request shall be denied if the existing individual sewage disposal system (ISDS) is in violation of any of these Regulations.” The existing septic system is currently in violation of Sections 5.1 and 11.26 of the SNHD ISDS Regulations.

Petitioner further requests a variance from Section 11.26 of the SNHD ISDS Regulations, which states that an “ISDS must be constructed on and remain on the same parcel as the structure(s) it serves.” The ISDS serves a single commercial building that is split between both parcels of the Subject Property. The septic tank and most of the leach field were constructed on the eastern

parcel (162-30-801-010), with the remainder of the leach field located on the western parcel (162-30-801-009).

Petitioner further requests a variance from Section 5.1 of the SNHD ISDS Regulations, which states that “No septic tank or soil absorption system shall be located within ten feet (10’) of any property line...” The ISDS system is within ten feet of the shared property line between the two parcels.

Petitioner states the following with regards to these requirements:

1. There must be circumstances or conditions which are unique to the applicant, and do not generally affect other persons subject to the regulation:

*“The existing commercial building was built in 1985 and straddles 2 parcels with the property line splitting the building in half. The ISDS was also installed straddling the property line and serves both sides of the building. The installed location is in compliance with all other adjacent property setbacks. However, “SNHD ISDS Regulations”, states “No septic tank or soil absorption system shall be located within ten feet (10’) of any property or tree, or shall trees be planted within ten (10’) of a soil absorption system of septic tank”. Therefore, since the ISDS is within 10’-0” of a property line a variance may be required. Since both parcels are owned by the same owner, the variance does not affect any other adjacent properties.”*

2. There must be circumstances or conditions which make compliance with the regulation unduly burdensome and cause a hardship to and abridge a substantial property right of the applicant, and the variance is necessary to render substantial justice to and preserve the property rights of the applicant. Please indicate in what manner compliance with the regulation would be burdensome or cause a hardship on your business or how the free use of your property may be affected (if economic factors are an issue, please include estimates regarding the costs that would be incurred by compliance):

*“The owner was awarded a government contract to manufacture ammunition shell casings for the U.S. Government in support of the DOD and must be in production within 2 months. During the plan review in September 2024, Clark County Building Department questioned the property line going through the building and instructed to resolve the concern one of the two ways: 1. Merge the parcels thus removed the property line or 2. Provide a Reciprocal Easement Agreement (REA) thus leaving the property line in place and granting full easements for parking, access and utilities. Because of the time sensitive nature of the project, the owner selected the option (REA) since it is the fastest route and hired Kaempher Crowell (Land Use Attorney) to complete and file/record the REA. This was completed in October 2024. The system meets all requirements of the Southern Nevada Health District (SNHD) regulations, with the only exception being its location on the property line between the two parcels owned by the same individual. Importantly, the system does not impact adjacent landowners, adheres to the required setbacks, and is both healthy and fully functional. Additionally, connecting to the city sewer at this time would disrupt the schedule and potentially jeopardize Carson Manufacturing’s government contract.”*

3. Granting the variance will not be detrimental or pose a danger to public health and safety. Please provide evidence that the variance request, if approved, will not adversely affect the safe and sanitary operation of the applicant(s) pool, spa, or food establishment:

*“This variance will not be detrimental or pose a danger to public health and safety because the septic system is in full compliance with the SNHD ISDS Regulations.”*

The Subject Property is depicted in Attachment D as Lot 3 and Lot 4 of the recorded parcel map, which was approved in 1985. The property has not been improved since the adoption of the current SNHD ISDS Regulations in 2009.

Examination of the Clark County Assessor’s records and parcel genealogy show that Petitioner is the second owner of the property and obtained the Subject Property in February 2022. An analysis of the surrounding area shows that there is one commercial well and 65 permitted septic systems within a square mile of the Subject Property.

On February 27, 2025, the Board of Health approved the Petitioner’s application for a variance from Sections 3.7, 5.1, and 11.26 of the SNHD ISDS Regulations, on the condition that the Petitioner would “discontinue use of the ISDS, connect structure it serves to the [Clark County Water Reclamation District (CCWRD)] community sewage system, and abandon or remove the ISDS in accordance with SNHD ISDS Regulations within one year of variance approval.” The Petitioner provided a progress update to staff on May 29, 2025, stating that they had “identified one of three options for the sewer connection and were awaiting two more bids from other contractors and hope to proceed as soon as possible.” On November 12, 2025, the Petitioner requested postponement of the deadline to connect to sewer due to delays in obtaining the electrical system upgrades necessary to run the manufacturing facility at full capacity.

More than one year has elapsed since the previous variance was approved, so the Petitioner is submitting this variance request for an additional twelve months to complete the sewer connection process. The additional time would allow the Petitioner to “complete the parcel remapping process with Clark County, finalize and submit sewer connection plans to CCWRD, coordinate construction without disrupting critical manufacturing operations, and stabilize our financial position following the utility-related operational disruptions.”

## **II. RECOMMENDATION:**

Staff are of the opinion that granting the variance would not endanger public health or safety. The Subject Property consists of two parcels with one commercial building straddling the two parcels. The two parcels remain owned by the same person, and the same single tenant (Carson Manufacturing) occupies the entire building. The ISDS was uncovered and inspected by Hardin & Sons, Inc. in December 2024 (see Attachments E-F). It still appears to be functioning adequately and remains in compliance with all other regulations.

Section 19.4.1 of the SNHD ISDS Regulations states that “Staff will not recommend variance approval for septic systems on lots where municipal sewer is gravity accessible within four

hundred feet (400') from the nearest property line." However, the Petitioner is working toward connecting to the CCWRD sewer line in W. Dewey Drive and has provided documentation supporting their assertion that delays in upgrading the electrical system have prevented the facility from operating at full capacity.

Based on Section 19.4.1 of the SNHD ISDS Regulations, staff do not recommend approval of the variance as requested by the Petitioner. If the Board of Health approves the variance, staff recommend approval with the following conditions outlined in Section III.

### **III. CONDITIONS:**

1. Petitioner and their successor(s) in interest shall discontinue use of the ISDS, connect structure it serves to the CCWRD community sewage system, and abandon or remove the ISDS in accordance with SNHD ISDS Regulations within one year of variance approval.
2. Petitioner and their successor(s) will abide by the operation and maintenance requirements of the most current SNHD Regulations governing individual sewage disposal systems.

#### Attachments:

- A. Variance Candidate Application
- B. Authorization Letter
- C. Justification Letter from the Petitioner
- D. Recorded Parcel Map
- E. Site Plan Prepared by Hardin & Sons, Inc.
- F. Letter from Hardin & Sons, Inc.
- G. Letter from Petitioner in Support of Extension Request
- H. Sewer Connection Progress
- I. Public Notice

Attachment A: Variance Candidate Application (Page 1 of 3)



VARIANCE CANDIDATE WORKSHEET

PART I:

ESTABLISHMENT INFORMATION

Name of Facility/Establishment: Carson Manufacturing, LLC / 4140 W. Dewey  
Health Permit Number: \_\_\_\_\_ Date of Inquiry: 1/8/2025  
Name of Operator/ Agent: Robert Nikora  
Address of Operator/ Agent: 4140 W. Dewey Las Vegas, NV 89118  
Contact Information of Operator/ Agent:  
Office Phone: na Cell Phone: (248) 933-3143  
Fax Number: na Email Address: Robert@carsonmfgnv.com  
If corporation, the name/title of individual to sign for Variance document:  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

OWNER INFORMATION

Name of Property Owner: Ernest Moody / Robert Nikora  
Address of Property Owner: 4140 W. Dewey Drive Las Vegas, NV 89118  
Contact Information of Property Owner:  
Office Phone: NA Cell Phone: (248) 933-3143  
Fax Number: NA Email Address: Robert@carsonmfgnv.com

PROPERTY INFORMATION

Property Address: 4140 W. Dewey Drive Las Vegas, NV 89118  
Assessor's Parcel Number (APN): 162 30 801 009/010  
Describe location within larger facility (i.e. hotel/casino/resort, etc.):  
Free-standing warehouse building on 1.09 acres (split between two parcels)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Describe Variance Issue (s): (Include sections of the Regulation or Nevada Administrative Code that applies to the request for a variance)

The existing ISDS is within 10'-0" of a property line and therefore is not in compliance with section 5 of the "SNHD ISDS Regulations" requiring 10'-0" setback from property line.  
However, both parcels are owned by the same owner and there is an existing commercial building that also straddles the property line.  
Otherwise, the ISDS is in full compliance with the SNHD ISDS Regulations and does not pose a danger to public health and safety.  
Because of this unique circumstance, the owner is burdened to comply with the SNHD ISDS Redularion and thus granted the right to apply for a variance per Nevada Administrative Code Section 439.200.  
\_\_\_\_\_  
\_\_\_\_\_

Attachment A: Variance Candidate Application (Page 2 of 3)

**PART II:**

Nevada Administrative Code 439.240 states in general that certain conditions or circumstances must be shown to exist in order for a Board of Health to approve a request for a Variance from adopted public health regulations. A variance application letter (as noted below in PART III) MUST specifically address each of the following issues:

1. There must be circumstances or conditions which are unique to the applicant, and do not generally affect other persons subject to the regulation. Please indicate how your request is unique to your situation and is, therefore, not likely to affect other persons subject to the regulations:

The existing commercial building was built in 1985 and straddles 2 parcels with the property line splitting the building in half. The ISDS was also installed straddling the property line and serves both sides of the building. The installed location is in compliance with all other adjacent property setbacks. However, "SNHD ISDS Regulations", states "No septic tank or soil absorption system shall be located within ten feet (10') of any property line or tree, or shall trees be planted within ten (10') of a soil absorption system or septic tank". Therefore, since the ISDS is within 10'-0" of a property line a variance may be required. Since both parcels are owned by the same owner, this variance does not affect any other adjacent properties.

2. There must be circumstances or conditions which make compliance with the regulation unduly burdensome and cause a hardship to and abridge a substantial property right of the applicant, and the variance is necessary to render substantial justice to and preserve the property rights of the applicant. Please indicate in what manner compliance with the regulation would be burdensome or cause a hardship on your business or how the free use of your property may be affected (if economic factors are an issue, please include estimates regarding the costs that would be incurred by compliance):

The owner was awarded a government contract to manufacture ammunition shell casings for the U.S. Government in support of the DOD and must be in production within 2 months. During plan review in September 2024, Clark County Building Department questioned the property line going through the building and instructed to resolve the concern one of two ways:  
1. Merge the parcels thus removing the property line or 2. Provide a Reciprocal Easement Agreement (REA) thus leaving the property line in place and granting full easements for parking, access and utilities. Because of the time sensitive nature of the project, the owner selected the option (REA) since it is the fastest route and hired Kaempher Crowell (land use attorney) to complete and file/record the REA - this was completed in October 2024. This system meets all the requirements of the Southern Nevada Health District (SNHD) regulations, with the only exception being its location on the property line between two parcels owned by the same individual. Importantly, the system does not impact any adjacent landowners, adheres to the required setbacks, and is both healthy and fully functional. Additionally, connecting to the city sewer at this time would disrupt the schedule and potentially jeopardize Carson Manufacturing's government contract.

3. Granting the variance will not be detrimental or pose a danger to the public health and safety. Please provide evidence that the variance request, if approved, will not adversely affect the safe and sanitary operation of the applicant(s) pool, spa, or food establishment:

This variance will not be detrimental or pose a danger to public health and safety because the septic system is in full compliance with the SNHD ISDS Regulations.

Attachment A: Variance Candidate Application (Page 3 of 3)

**NAC 439.240 Approval by State Board of Health. (NRS 439.150, 439.190, 439.200)**

1. The State Board of Health will grant a variance from a regulation only if it finds from the evidence presented at the hearing that:
  - (a) There are circumstances or conditions which:
    - (1) Are unique to the applicant;
    - (2) Do not generally affect other persons subject to the regulation;
    - (3) Make compliance with the regulation unduly burdensome; and
    - (4) Cause a hardship to and abridge a substantial property right of the applicant; and
  - (b) Granting the variance:
    - (1) Is necessary to render substantial justice to the applicant and enable the applicant to preserve and enjoy his or her property right; and
    - (2) Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a variance alleges that he or she suffers or will suffer economic hardship by complying with the regulation, the applicant must submit evidence demonstrating the costs of compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable.  
[Bd. of Health, Variances Reg. §§ 2.7-2.8, eff. 10-16-80; A 2-5-82; 1-19-84]

**PART III:**

**A Variance Application Letter**, which includes all information provided by the applicant on his worksheet, must be submitted in writing to the Environmental Health Division (EHD) Director no later than 40 days before the monthly Board of Health Meeting. **The Application letter must be on the owner's letterhead signed by the Owner/Corporate Officer specifically listing which part(s) of the Regulation the proposed Variance covers with this completed Worksheet as an attachment. The written Application Letter must take particular care in providing statements and evidence of circumstances or conditions and reasons why the District Board of Health should grant the Variance as listed in NAC 439.240 as shown at the top of this page. ALL information you have provided in PART I and II of this Worksheet must be included in the body of the letter.** The evidence required may include 8 1/2" x 11" or 11" x 17" detailed drawings and/or photographs.

The Variance process is outlined in Nevada Administrative Code (NAC) 439.200 through 439.260 with the exception that an application fee is payable to SOUTHERN NEVADA HEALTH DISTRICT (SNHD).

**This section to be completed by SNHD staff ONLY**

Next closing date is: \_\_\_\_\_ for the \_\_\_\_\_ BOH Meeting.

Referred by: \_\_\_\_\_

(Print Name of REHS)

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_

(Print Name of REHS if not by supervisor)

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

(Owner/Operator/Agent)

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

(Signature of SNHD Manager)

Attachment B: Authorization Letter



**KNIT**

7250 Peak Drive,  
Suite 216  
Las Vegas, NV 89128  
P 702.363.2222  
F 702.363.6060

Nevada  
Utah  
Washington  
Idaho

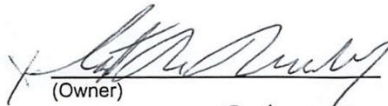
[knitstudios.com](http://knitstudios.com)

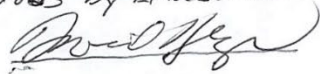
**Authorization Letter**

February 5, 2025

Southern Nevada Health District  
280 S. Decatur Blvd.  
P.O. Box 3902  
Las Vegas, Nevada 89127

I, MOODY ERNEST W REVOCABLE TRUST do hereby authorize KNIT to make application for a septic system variance in the matter of 40140 West Dewey Avenue, Las Vegas, Nevada, Assessor's Parcel Number (162-30-801-009, 162-30-801-010). Also, in the event that neither of us can be present at the February 27, 2025 Southern Nevada District Board of Health meeting, KNIT is authorized to speak on my/our behalf. However, we understand that both of us must sign both the letter of request and variance order.

  
(Owner)

(Notarized) *State of Nevada  
County of Clark  
This instrument was acknowledged before  
me on February 5, 2025 by Ernest W.  
Moody* 

\_\_\_\_\_  
(Owner)



(Notarized)

John Anderson, RD  
Mark McGinty, RD  
Eric M. Roberts, FAIA  
John Sawdon, AIA

Attachment C: Justification Letter from the Petitioner (Page 1 of 2)



Southern Nevada Health District  
Attention: Dan Isler  
Environmental Health Engineer  
PO Box 3902  
Las Vegas, NV 89127

November 12, 2025

Dear Mr. Isler:

I am writing on behalf of my client, Carson Manufacturing, LLC located at 4140 & 4130 Dewey Drive, to respectfully request a variance and temporary extension from compliance with Section 5.1 of the Southern Nevada District Board of Health Regulations Governing Individual Sewage Disposal Systems and Liquid Waste Management ("SNHD ISDS Regulations"), which states that no septic tank or soil absorption system shall be located within ten feet (10') of any property line or tree.

At this location within the warehouse district consists of 1.09 acres across two adjacent parcels. The existing single commercial building, constructed in 1985, straddles the property line between the two parcels, both of which are owned by Mr. Ernest Moody. The property has long operated with shared utilities and a single septic system, consistent with construction standards of that era.

Since acquiring the property, Carson Manufacturing has undertaken renovations to prepare the facility for manufacturing ammunition shell casings under a U.S. government contract. In September 2024, during Clark County Building Department's plan review, the existing property line was identified as an issue, and the owner was advised to either merge the parcels or record a Reciprocal Easement Agreement (REA). Due to tight operational timelines, an REA drafted by Kaempfer Crowell was recorded with Clark County, granting full cross-access for parking, utilities, and uses between the two parcels.

The existing Individual Sewage Disposal System (ISDS) was inspected by Hardin & Sons, Inc., who found no signs of deterioration. Their report confirmed that the system is clean, stable, and functioning within regulatory guidelines, except for its location on the property line. The tank and leach field presently meet all required setback standards and continue to operate safely without impact on adjacent properties.

We recently encountered significant construction delays due to utility coordination and infrastructure requirements beyond our control. Despite working diligently with NV Energy and other utility providers, the prolonged interruptions have delayed our ability to achieve full operational capacity. These challenges have severely impacted revenue and placed considerable strain on our ability to satisfy the terms of our active government contract.

Attachment C: Justification Letter from the Petitioner (Page 2 of 2)



Connecting to the public sewer system at this point would impose additional costs and delays that could jeopardize continued operations and contract compliance.

Given these circumstances, we respectfully request that the Southern Nevada Health District defer the requirement to connect to the municipal sewer and allow the existing ISDS to remain in service until construction activities are fully completed and operations have stabilized. We deeply appreciate your consideration and assistance during this challenging period.

I can be reached at (702) 526-3666 or via email [kami@acnevada.com](mailto:kami@acnevada.com).

Respectfully,

A handwritten signature in blue ink that reads "Kami L. Dempsey".

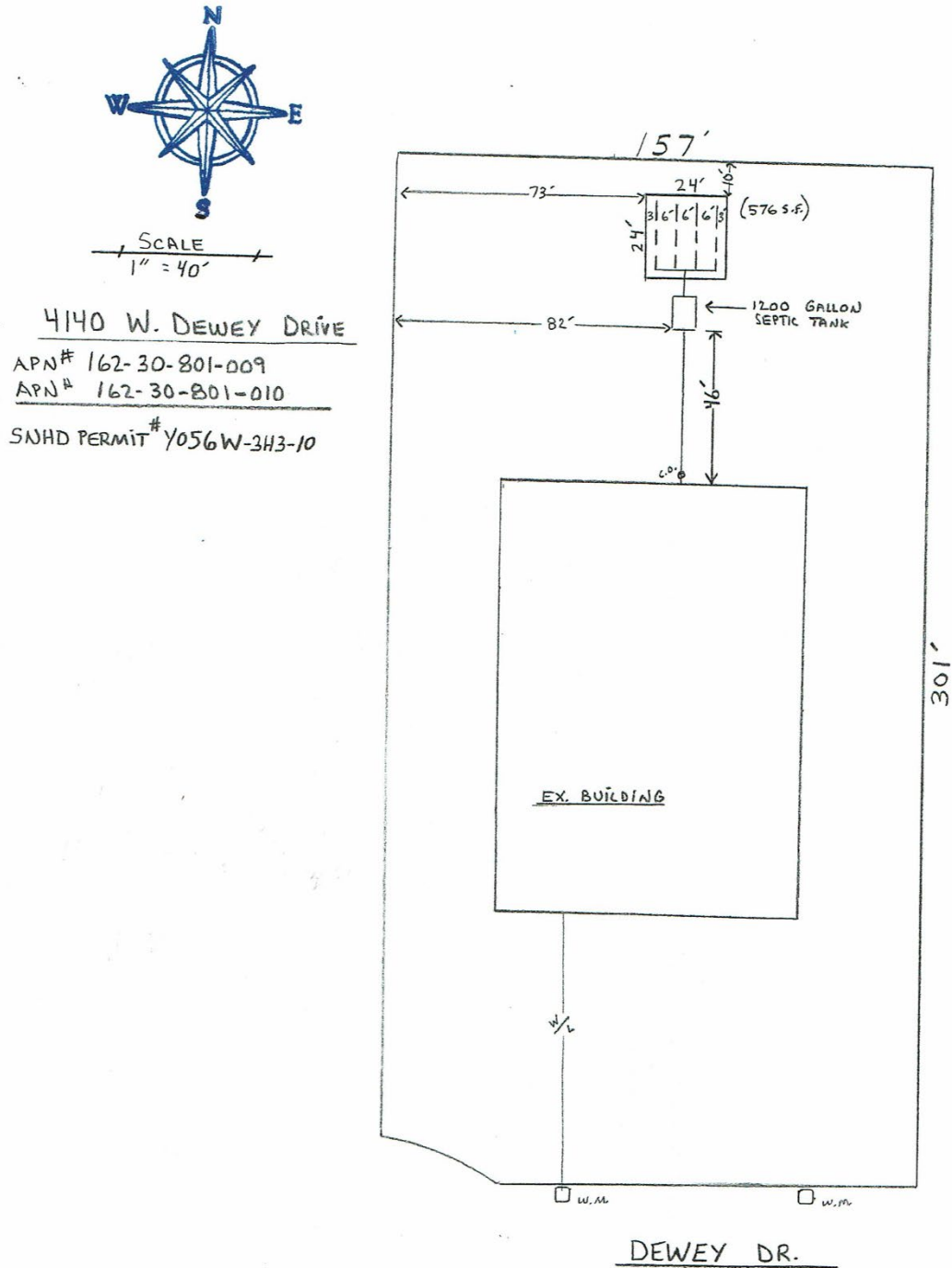
Kami L. Dempsey  
President

CC:

Robert Nikora  
Carson Manufacturing



Attachment E: Site Plan Prepared by Hardin & Sons, Inc.



Attachment F: Letter from Hardin & Sons, Inc.

**HARDIN & SONS, INC.**

Custom Excavating

Contractors Lic. #0030813

Hardin.Sons@gmail.com

201 W. Cheyenne Ave.

North Las Vegas, NV 89030

Tel (702) 399-3878

Fax (702) 399-2032

December 19, 2024

To Whom It May Concern:

RE: 4140 W Dewey Dr.

Las Vegas, NV

SNHID Permit # Y056W-3H3-10

Phone: 248-933-3143

Email: Robert@4140armory.com

This letter is to inform you of the results per my inspection at 4140 W Dewey Dr. regarding the status of the existing septic system.

The septic tank is located on the north side of the building with the leach field extending to the north. The Southern Nevada Health District permit and inspection report reflect a 1200 gallon septic tank and 576 sq. ft. leach field. The tank and leach field appear to be within the required guidelines for setbacks to the structure and the property lines.

The septic tank appears to show no sign of deterioration. The tank appears to be clean and the system is at operational level and appears to be functioning fine at this time. The Southern Nevada Health District recommends the septic tank be pumped out every four to six years.

The Southern Nevada Health District requires all trees to be at least 10 ft. from the septic tank and leach field.

If you have any further questions please feel free to contact me at 702-399-3878.

Sincerely,



Dale Martin

President

Hardin & Sons, Inc

Attachment G: Letter from Petitioner in Support of Extension Request (Page 1 of 4)



February 17, 2026

Southern Nevada Health District  
Attention: Daniel Isler, PE, REHS  
Environmental Health Engineer/Supervisor  
PO Box 3902  
Las Vegas, NV 89127

RE: Request for Additional Extension – Sewer Connection Requirement

Carson Manufacturing, LLC  
4130 & 4140 W. Dewey Drive, Las Vegas, NV 89118  
APN: 162-30-801-009 and 162-30-801-010

Dear Mr. Isler:

I am writing on behalf of my client, Carson Manufacturing, LLC, to respectfully request an additional extension of the deadline to connect to the Clark County Water Reclamation District (CCWRD) sewer system. As you are aware, the Southern Nevada District Board of Health approved a variance on February 27, 2025, with the condition that Carson Manufacturing connect to the municipal sewer system within twelve months.

Carson Manufacturing has diligently worked to meet this requirement and remains fully committed to compliance. However, a series of unanticipated delays related to government agency coordination and utility infrastructure issues—circumstances entirely beyond our control—have made it impossible to meet the original timeline. We respectfully request your consideration for an extension to allow us to complete the connection process without further jeopardizing our operations.

**Summary of Good Faith Efforts and Delays Encountered**

Since the variance approval, Carson Manufacturing has taken every reasonable step to advance the sewer connection process. As documented in the enclosed status memorandum from our architect, Danny McGinnis of Knit, the past twelve months have included:

- Completion of tenant improvements (March–August 2025)
- Development of remapping plans and sewer connection drawings (June–August 2025)
- Submission of remapping application and payment of fees (October 2025)

*Kami L. Dempsey*  
President

(702) 526-3666  
[kami@acnevada.com](mailto:kami@acnevada.com)

Attachment G: Letter from Petitioner in Support of Extension Request (Page 2 of 4)



- Title report updates and submission of trust ownership documents (November–December 2025)
- Submission of parcel map to Clark County with request for Administrative Exemption (January 2026)
- Surveyor's submission of pre-determination letter, with sewer connection plans to follow upon approval (February 2026)

These efforts represent substantial progress; however, they have been significantly hindered by bureaucratic processing timelines and coordination challenges with multiple governmental agencies—processes over which we have no control.

**Critical Utility Infrastructure Delays**

Most significantly, Carson Manufacturing has experienced severe setbacks due to electrical power supply issues with NV Energy. A series of email and text communications with Tony Sanchez, Executive Vice President of Business Development and External Relations at NV Energy, documents repeated attempts to course-correct numerous errors and project handling issues on their end. I am happy to provide a summary of these communications to you if needed.

These utility-related challenges have caused substantial schedule impacts and prevented Carson Manufacturing from obtaining the stable and adequate electrical service necessary to support full operations. If the power upgrade could not be completed within an acceptable timeframe Carson Manufacturing would be forced to move operation to an out of state location.

Our electrical upgrade delays were caused by:

1. Exceptionally high priority workload across the City of Las Vegas, resulting in extended timelines for critical infrastructure projects.
2. Software system failures within NV Energy's project management portals beginning in August 2025, which inadvertently removed the Carson Manufacturing project from active processing. This issue persisted through September 2025 before being identified and corrected.
3. Extended design phase delays due to the combined impact of workload constraints and system failures.

These power supply interruptions had devastating operational consequences. Without adequate electrical capacity, Carson Manufacturing was forced to drastically reduce staffing levels and operate at approximately one-third of planned production capacity. This

Attachment G: Letter from Petitioner in Support of Extension Request (Page 3 of 4)



reduction placed our largest contract, critical casing manufacturing agreement with the U.S. Department of Defense at serious risk of default.

**Operational and Financial Impact**

The cumulative effect of these delays has created severe financial strain on Carson Manufacturing. The inability to achieve full operational capacity due to infrastructure delays has directly impacted revenue generation and our ability to fulfill contractual obligations with the federal government. Requiring immediate sewer connection at this juncture would impose additional substantial costs and construction interruptions that could threaten the viability of continued operations and our ability to meet defense contract requirements.

**Commitment to Compliance**

Carson Manufacturing remains firmly committed to connecting to the municipal sewer system and fully complying with all Southern Nevada Health District regulations. The existing Individual Sewage Disposal System (ISDS) has been inspected by Hardin & Sons, Inc., and confirmed to be clean, stable, and functioning within regulatory guidelines without impact on adjacent properties. We are requesting additional time—not avoidance of our obligations to complete the connection process once ongoing infrastructure challenges have been resolved and operations have stabilized.

**Request for Extension**

Given the extraordinary circumstances outlined above, we respectfully request that the Southern Nevada Health District grant an additional extension of twelve months (12) from the original deadline to allow Carson Manufacturing to complete the sewer connection process. This extension will provide the necessary time to:

- Complete the parcel remapping process with Clark County
- Finalize and submit sewer connection plans to CCWRD
- Coordinate construction without disrupting critical manufacturing operations
- Stabilize our financial position following the utility-related operational disruptions

We deeply appreciate the Southern Nevada Health District's professionalism and consideration throughout this process. Your office has been a valued partner, and we are grateful for your understanding of the challenges we have faced. We remain committed to achieving full compliance as expeditiously as circumstances permit.

Attachment G: Letter from Petitioner in Support of Extension Request (Page 4 of 4)



I am available to discuss this matter further at your convenience and can be reached at (702) 526-3666 or via email at [kami@acnevada.com](mailto:kami@acnevada.com). Thank you for your time and consideration.

Respectfully submitted,

Kami L. Dempsey  
President  
Accretive Consulting, LLC

Enclosures:

- Status Memorandum from Danny McGinnis, AIA (Knit) dated February 12, 2026
- NV Energy Delay Summary Document
- Board of Health Variance Approval Memo dated February 27, 2025
- SNHD Notice of Inspection
- Email Communications with NV Energy

CC:

Robert Nikora, Carson Manufacturing, LLC  
Danny McGinnis, AIA, Knit

## Attachment H: Sewer Connection Progress Timeline



KNIT

February 12, 2026

Robert Nikora  
Carson Manufacturing, LLC  
4140 West Dewey Drive  
Las Vegas, NV 89118

**Subject: Carson Manufacturing/ Dewey Warehouse Sewer Connection Progress**  
**APN: 162-30-801-009**

Mr. Nikora:

The purpose of this memorandum is to offer a status update regarding the developments over the past year concerning the connection of the existing septic system to the sanitary sewer system. An important point to note is that before submitting sewer connection plans to the Clark County Water Reclamation District, the two parcels must be re-mapped into a single entity.

Schedule of events:

- January 2025: Meeting with the Owner, Architect, and the Southern Nevada Health District (SNHD) to deliberate on the justification hardship concerning connecting to the city sewer.
- February 2025: Meeting with the SNHD Board resulting in the approval of the Septic Variance, with the condition to establish connection to the city sewer within twelve months.
- March-April 2025: Construction of the Tenant Improvement.
- May 2025: The Owner provided an update to the SNHD.
- June-August 2025: Completion of the Tenant Improvement and development of the maps and sewer connection drawings and documents
- September 2025: Notice to proceed issued for re-mapping and sewer connection, received from the Owner and finalizing documents.
- October 2025: Mappings application submitted and fees paid.
- November-December 2025: Update of the Title Report and submission of Trust documents as proof of ownership.
- January 2026: Submission of the map to Clark County and request for inclusion of an Administrative Exemption.
- February 2026: Surveyor submitted Pre-determination letter pending approval will submit Sewer Connection plans.

Thank you for your consideration and please contact the undersigned at (702) 341-2279 with any additional concerns or questions.

Sincerely,

Danny McGinnis, AIA  
Director of Operations  
Knit  
7250 Peak Drive Suite 216  
Las Vegas NV 89128

Attachment I: Public Notice



**PUBLIC NOTICE**

The Southern Nevada District Board of Health will conduct a PUBLIC HEARING on Thursday, April 23, 2026 at 9:00 AM during its regular monthly meeting in the Red Rock Conference Room at the Southern Nevada Health District at 280 S. Decatur Blvd., Las Vegas, Nevada, to approve or deny a variance request filed by Ernest Moody (“Petitioner”), to allow an existing individual sewage disposal system to remain serving two properties located at 4130 and 4140 W. Dewey Dr., Las Vegas, NV 89118, APNs 162-30-801-009 and -010.

The variance is requested to allow the Petitioner to obtain approval for a Tenant Improvement in accordance with Section 3 of the *Southern Nevada District Board of Health Regulations Governing Individual Sewage Disposal Systems and Liquid Waste Management* and to allow future building permits to be issued. The variance will allow the existing septic system to remain split across two parcels.

All interested persons may appear at the hearing and state their positions. All written and oral submissions will be considered by the Southern Nevada District Board of Health. Written comments must be forwarded by April 22, 2026, to:

Daniel Isler, P.E., REHS  
Environmental Health Engineer/Supervisor  
Southern Nevada Health District  
P.O. Box 3902  
Las Vegas, Nevada 89127  
isler@snhd.org

The variance application is available for review at the Southern Nevada Health District, 280 S. Decatur Blvd., Las Vegas, Nevada 89107. Please contact Cherie Custodio at (702) 759-0660 to schedule an appointment to review the application during the normal business hours of 8:00 AM to 4:30 PM.

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Chris Saxton, MPH-EH, REHS  
Director of Environmental Health

April 7, 2026  
Date