

Julia Loudon

From: Sarah Ehmer
Sent: Wednesday, November 5, 2025 4:12 PM
To: Julia Loudon
Subject: RE CUP2025-00047/SEP2025-00021

Hi, Julia,

Following up to our earlier conversation, water resources will require some additional information on this project.

1. A hydrogeologic impact assessment that evaluates current water use for the existing operations including pumping rates and annual consumption calculations across all wells and all beneficial uses and future estimated water requirements and how proof of water right will be provided for any proposed future use. An inventory of all the wells located on the project parcels, well logs for all wells located on the project parcels, the point(s) of use for each well on the project parcels, the beneficial use(s) of each well, a calculated quantity of current water use from each well for each beneficial use. Calculations of water consumption for each beneficial use under the groundwater permit exemption need to include maximum daily peak use for all use days, not just an annual average. Calculated volumes of water used for dust abatement on site and the source of that water is also requested.
2. The water right certificate included is not valid for the proposed use(s). The water right G4-27178 authorizes withdrawal Qi of 255 gpm and Qa of 190.4 afy from April through October 31 each year for the **irrigation of 80 acres**. This does not authorize withdrawal for the beneficial uses listed in this application. If the applicant wishes to use this water right as proof of water right for the project, the current water right certificate will have to go through the formal change process with Ecology and be issued a new water right certificate that states the point of withdrawal, the place of use, the beneficial use(s) the instantaneous quantity (Qi) and the annual use (Qa).
3. The project narrative states

4.4.1 Water

Water will be withdrawn from wells for: (1) domestic use; (2) "industrial" uses including wash water for equipment sanitization, (3) non-transient, non-community (NTNC) public water system (PWS) uses; and (4) stockwater purposes. All uses are exempt from requiring a groundwater permit for the supplying w

per RCW 90.44.050. Domestic, industrial, and PWS uses cannot exceed 5,000 gallons per day; stockwater withdrawals are unlimited. Using accepted quantities of expected water consumption for this herd mixture, the average daily water consumption over a year is calculated as approximately 119,500 gallons per day or 0.4 acre-feet per day.

Public water systems is not a beneficial use of groundwater allowed under the groundwater permit exemption (RCW90.44.050). Proof of water right for this use needs to be provided or, if suitable, this use should be calculated as part of the industrial usage.

4. The project narrative states that there is no demolition proposed for the project AND that there will be a 26,000sf milk mixing shop added to the west operations area and a 38,000sf commodity barn also to the west operations area. If any new use of water (any new restrooms, sinks etc.) will be included with these new facilities, that water use needs to be declared so that proof of water right can be evaluated for these buildings.

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