

# Groundwater Transfer Review Summary Form

Transfer/PA # T- 14718

GW Reviewer Gabriela Ferreira Date Review Completed: January 12, 2026

## Summary of Same Source Review:

The proposed change in point of appropriation is not within the same aquifer as per OAR 690-380-2110(2).

## Summary of Water Level Decline Condition Review:

Water levels at the original point(s) of appropriation have exceeded the allowed decline threshold defined by conditions in the originating water right.

## Summary of Injury Review:

The proposed transfer will result in another, existing water right not receiving previously available water to which it is legally entitled or result in significant interference with a surface water source as per 690-380-0100(3).

## Summary of GW-SW Transfer Similarity Review:

The proposed SW-GW transfer doesn't meet the definition of "similarly" as per OAR 690-380-2130.

*This is only a summary. Documentation is attached and should be read thoroughly to understand the basis for determinations.*



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## Ground Water Review Form:

- Water Right Transfer
- Permit Amendment
- GR Modification
- Other

Application: T-14718

Applicant Name: Rockwood Water People’s Utility District and City of Gresham

Proposed Changes:     POA             APOA             SW→GW             RA  
                                   USE             POU             OTHER

Reviewer(s): Gabriela Ferreira

Date of Review: 1/12/2026

Date Reviewed by GW Mgr. and Returned to WRSD: \_\_\_\_\_

The information provided in the application is insufficient to evaluate whether the proposed transfer may be approved because:

- The water well reports provided with the application do not correspond to the water rights affected by the transfer.
- The application does not include water well reports or a description of the well construction details sufficient to establish the ground water body developed or proposed to be developed.
- Other \_\_\_\_\_

1. Basic description of the changes proposed in this transfer: This proposed transfer relates to Permit G-18850 which authorizes the use of groundwater from twelve POAs for municipal use of 53.5 cfs. The municipal use services the City of Gresham and Rockwood Water People’s Utility District in east Multnomah County.

The transfer proposes to add three APOAs, one of which is already constructed (Cascade 6B / MULT 122597). The authorized and proposed POAs are summarized below (Table 1).

POA number	Well Name	Log ID
<b>Authorized POAs</b>		
1	Well 1 (Cascade 5)	MULT 98998
2	Well 2	Not yet constructed
3	Well 3 (Cascade 6)	MULT 142639
4	Well 4	Not yet constructed
5	Well 5	Not yet constructed
6	Well 6 (Cascade 3)	MULT 70128
7	Well 7	Not yet constructed
8	Well 8 (Cascade 8)	MULT 136609

9	Cascade 4	MULT 72119
10	Cascade 7	MULT 136199
11	Well 9 (Cascade 9)	MULT 136598
12	Well 10	Not yet constructed
<b>Proposed APOAs</b>		
13	Cascade 6A	Not yet constructed
14	Cascade 6B	MULT 122597
15	Cascade 10	Not yet constructed

2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?  
 Yes    No   Comments: Permit G-18850 authorizes groundwater withdrawal from the Portland Sand and Gravel Aquifer (SGA), which is estimated to be first encountered at depths approximately 360 to 380 feet below mean sea level (msl) (~700 – 720 feet below land surface [bls]) in the vicinity of the proposed APOAs (Swanson *et al.*, 1993). Proposed APOA wells Cascade 6A and Cascade 10 are planned to be cased and sealed to 770 and 785 feet bls (approximately 430 feet below msl), respectively. Constructed APOA well Cascade 6B / MULT 122597 is sealed to 693 feet bls (355 feet below msl). The proposed POAs would develop the same aquifer as the existing authorized POAs.
3. a) Is the existing authorized POA subject to a water level decline condition?  
 Yes    No   Comments: Permit G-18850 describes water use and water level measurement conditions; however, water level decline conditions are not included in the permit. The permit indicates that “If substantial interference with a senior water right occurs due to withdrawal of water from any well list on this permit, then use of water from the well(s) shall be discontinued or reduced.”
- b) If yes, for each POA identify the reference level, most recent spring-high water level, and whether an applicable permit decline condition has been exceeded: N/A
4. a) Is there more than one source developed under the right (e.g., basalt and alluvium)?  
 Yes    No   Comments: Permit G-18850 authorizes groundwater withdrawal from one source, the SGA.
- b) If yes, estimate the portion of the right supplied by each of the sources and describe any limitations that will need to be placed on the proposed change (rate, duty, etc.): N/A
5. a) Will this proposed change, at its maximum allowed rate of use, likely result in an increase in interference with **another ground water right**?  
 Yes    No   Comments: The large number of POAs involved in this transfer makes it difficult to assess the potential for increased interference with other groundwater rights. To evaluate the changes most likely to lead to increased interference, interference was evaluated for the nearest identified SGA well, MULT 78266. Although the well completion depths of the proposed APOAs are deeper than the construction of MULT 78266, MULT 78266 also produces from the SGA.

The proposed location of authorized POA 5 / Well 5 is approximately 1 mile from the mapped location of MULT 78266; in comparison, the proposed location of the APOAs (Cascade 6A, Cascade 6B, and Cascade 10) would be approximately 1.1 mile from the location of MULT 78266. Since proposed POA 5 / Well 5 is not yet drilled, potential for injury with MULT 78266 by pumping from Cascade 6B / MULT 122597 was evaluated as a protective measure. Relative to MULT 78266, the intervening distance of the proposed APOAs is greater than the distance between the authorized POA 5, such that it is unlikely that the proposed APOAs would increase interference with MULT 78266. However, since POA 5 / Well 5 is not yet drilled, potential interference with MULT 78266 was evaluated for this review by estimating the simulated pumping effects from proposed APOA MULT 122597 / Cascade 6B.

b) If yes, would this proposed change, at its maximum allowed rate of use, likely result in another groundwater right not receiving the water to which it is legally entitled?

Yes  No If yes, explain: Well MULT 78266 was identified as the nearest well in the SGA that could experience the interference from the proposed APOAs. The additional interference was modeled using the Theis drawdown model (Theis, 1935) and a range of hydrogeologic parameter values derived from studies and pumping tests performed on the authorized and proposed POAs. The pumping rate was conservatively modeled at 5 cfs, based on the highest reported pumping rate of the authorized POAs (authorized POA 11/ MULT 136598 / Cascade 9). The aquifer thickness is based on the open interval in proposed APOA MULT 122597 / Cascade 6B.

The attached figures show that the maximum acute interference to MULT 78266 by pumping MULT 122597 would be approximately 6 to 26 feet, as compared to approximately 7 to 28 feet of acute interference by pumping from authorized POA 5 / Well 5.

Based on the modeled drawdown, estimated interference is below typical permit conditions and would not constitute substantial interference. Furthermore, the estimated interference would only constitute Substantial and Undue Interference (OAR 690-008-0001(8) (c)) if the well fully penetrated the SGA, which MULT 78266 does not. A fully-penetrating well at the location of MULT 78266 would access more than 1000 feet of saturated thickness, such that the estimated interference would not likely be sufficient to prevent another groundwater right from receiving the water to which it is legally entitled.

6. a) Will this proposed change, at its maximum allowed rate of use, likely result in an increase in interference with **another surface water source**?

Yes  No Comments: The Portland Sand and Gravel aquifer accessed by the proposed APOAs is hydraulically connected to the Columbia River, primarily through the Unconsolidated Sedimentary Aquifer (USA) under the Columbia River, where the SGA becomes unconfined (Swanson *et al.*, 1993, plate 2c).

The SGA is overlain by two confining layers, which effectively separate the SGA hydraulically from other nearby surface water bodies (e.g. Sandy River, Kelly Creek). These surface water bodies may incise into the uppermost confining layer at further downstream reaches but are not hydraulically connected to the SGA.

Compared to the location of the authorized POAs , the proposed APOAs would be located at relatively greater distances to the Columbia River, and thus it is unlikely that interference with the Columbia River would increase as a result of this proposed change.

b) If yes, at its maximum allowed rate of use, what is the expected change in degree of interference with any **surface water sources** resulting from the proposed change?

Stream: \_\_\_\_\_  Minimal  Significant

Stream: \_\_\_\_\_  Minimal  Significant

Provide context for minimal/significant impact: N/A

7. For SW-GW transfers, will the proposed change in point of diversion affect the surface water source similarly (as per OAR 690-380-2130) to the authorized point of diversion specified in the water use subject to transfer?

Yes  No Comments: N/A

8. What conditions or other changes in the application are necessary to address any potential issues identified above: \_\_\_\_\_

9. Any additional comments: \_\_\_\_\_

**References:**

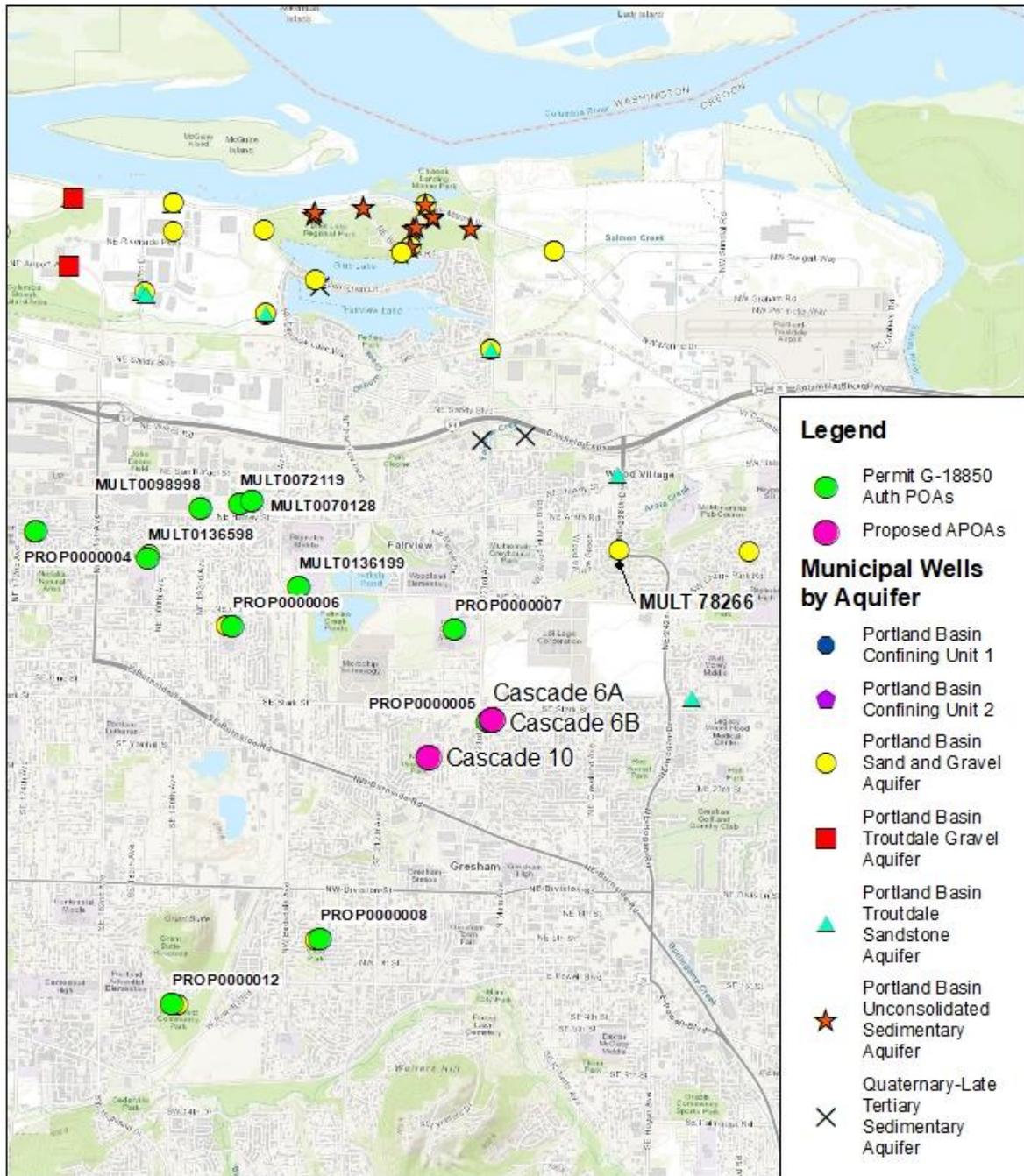
Well logs and pumping test data: MULT 98998, MULT 142639, MULT 70128, MULT 136609, MULT 72119, MULT 136199, MULT 136598, MULT 122597

Swanson, R. D., McFarland, W. D., Gonthier, J. B., and Wilkinson, J. M., 1993, A description of hydrogeologic units in the Portland Basin, Oregon and Washington, Water-Resources Investigations Report 90-4196, 56 p.: U. S. Geological Survey, Reston, VA.

Theis, C.V., 1935, The relation between the lowering of the piezometric surface and the rate and duration of discharge of a well using groundwater storage, American Geophysical Union Transactions, vol. 16, p. 519-524.

Site Figure

T-14718 Rockwood / Gresham



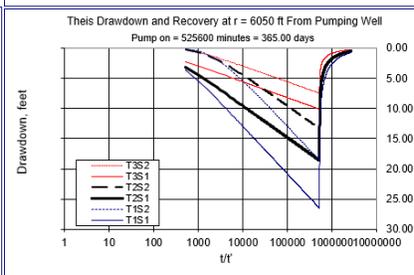
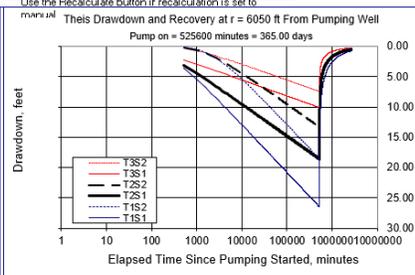
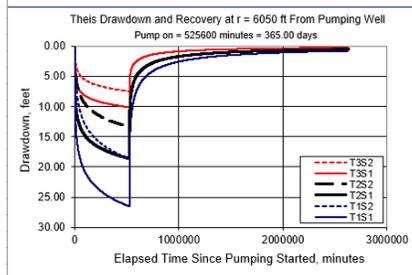
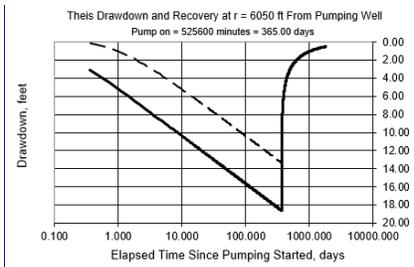
Main Map Scale = 1:24,000

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Modeled drawdown at MULT 78266 as a result of pumping at proposed APOA MULT 122597 / Cascade 6B (proposed scenario)

**This Time-Drawdown Worksheet** v.5.00  
 Calculates This nonequilibrium drawdown and recovery at any arbitrary radial distance, r, from a pumping well for 3 different T values and radial distance, r, from a pumping well for 3 different T values and 2 different S values.  
 Written by Karl C. Wozniak September 1992. Last modified December 17, 2019

Input Data:	Var Name	Scenario 1	Scenario 2	Scenario 3	Units
Total pumping time	t		365		d
Radial distance from pumped well:	r		6050		ft
Pumping rate	Q		5		cfs
Hydraulic conductivity	K	100	150	300	ft/day
Aquifer thickness	b		100		ft
Storativity	S_1		0.0001		
	S_2		0.001		
Transmissivity Conversions	T_ftpd	10000	15000	30000	ft <sup>2</sup> /day
	T_ft2pm	6.94444444	10.4166667	20.8333333	ft <sup>2</sup> /min
	T_gpdft	74800	112200	224400	gpd/ft
					ft <sup>2</sup> /min



Modeled drawdown at MULT 78266 as a result of pumping at authorized POA 5 / Well 5 (authorized scenario)

**This Time-Drawdown Worksheet** v.5.00  
 Calculates This nonequilibrium drawdown and recovery at any arbitrary radial distance, r, from a pumping well for 3 different T values and radial distance, r, from a pumping well for 3 different T values and 2 different S values.  
 Written by Karl C. Wozniak September 1992. Last modified December 17, 2019

Input Data:	Var Name	Scenario 1	Scenario 2	Scenario 3	Units
Total pumping time	t		365		d
Radial distance from pumped well:	r		5300		ft
Pumping rate	Q		5		cfs
Hydraulic conductivity	K	100	150	300	ft/day
Aquifer thickness	b		100		ft
Storativity	S_1		0.0001		
	S_2		0.001		
Transmissivity Conversions	T_ftpd	10000	15000	30000	ft <sup>2</sup> /day
	T_ft2pm	6.94444444	10.4166667	20.8333333	ft <sup>2</sup> /min
	T_gpdft	74800	112200	224400	gpd/ft
					ft <sup>2</sup> /min

