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November 14, 2024

Lucinda Vranizan
Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301

RE: City of Redmond Water Right Application G-19348

Dear Lucinda,

On February 23, 2024, the City received an initial review from the Oregon Water Resources Department (OWRD) proposing to deny the City's groundwater permit application G-19348 (Application). OWRD's groundwater review found that water is not available for the proposed use. The City understands that OWRD is concerned about the continued buildout of existing water rights contributing to further groundwater declines in the future, which may preclude the eventual use of the resource. While the City does not agree with this concern, the City is willing to request a condition to limit the volume pumped under any permit issued in response to application G-19348 to the volume of water already authorized under its existing groundwater rights, being 17,877.2 acre-feet. This would provide the City with the operational flexibility to pump water at a higher instantaneous rate than is allowed under its current water rights without increasing the total volume of groundwater pumping already authorized in the central part of the Deschutes Basin.

Please find enclosed modified pages of the City's original application clarifying the City's reducing the volume of water requested under Application G-19348.

Sincerely,
GSI Water Solutions, Inc.

A handwritten signature in black ink that reads "Owen McMurtrey".

Owen McMurtrey
Water Resources Consultant

Cc: Josh Wedding, Water Utilities Manager, City of Redmond
Sarah Liljefelt, Dunn Carney

Enclosures: Modified Application Materials for Groundwater Permit Application G-19348

SECTION 3: WELL DEVELOPMENT, continued

Total maximum rate requested: 5.12 cfs (each well will be evaluated at the maximum rate unless you indicate well-specific rates and annual volumes in the table below).

The table below must be completed for each source to be evaluated or the application will be returned. If this is an existing well, the information may be found on the applicable well log. *(If a well log is available, please submit it in addition to completing the table.)* If this is a proposed well, or well-modification, consider consulting with a licensed well driller, geologist, or certified water right examiner to obtain the necessary information.

See [Attachment D – Well Logs](#)

OWNER'S WELL NAME OR NO.	PROPOSED	EXISTING	WELL ID (WELL TAG) NO.* OR WELL LOG ID**	FLOWING ARTESIAN	CASING DIAMETER (INCHES)	CASING INTERVALS (FEET)	PERFORATED OR SCREENED INTERVALS (FEET)	SEAL INTERVALS (FEET)	MOST RECENT STATIC WATER LEVEL & DATE (FEET)	PROPOSED USE			
										SOURCE AQUIFER***	TOTAL WELL DEPTH (FEET)	WELL-SPECIFIC RATE (GPM)	ANNUAL VOLUME (ACRE-FEET)
WELL 6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DESC 55853	<input type="checkbox"/>	16 16	+2-550 850-855	550-850	374-399 0-98	358.9 (3/1/2021)	Deschutes Formation	855	N/A	1,828 N/A – See Section 10
WELL 7	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DESC 57788	<input type="checkbox"/>	16 16 16	+2-525 625-700 750-780 860-862.5	525-625 700-750 780-860	0-68 282-322	335.6 (3/1/2021)		860		
WELL 8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DESC 62721	<input type="checkbox"/>	20 18	+7-743 974-985	744-974	0-275	471 (3/4/2021)		985		
WELL 9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A	<input type="checkbox"/>	16	+2-800	507-547 567-797	0-100	259		800		
WELL 10	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See note	<input type="checkbox"/>									
WELL 11	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Note	<input type="checkbox"/>									

Note: Construction for Wells 10 and 11 to be similar to actual construction for Well 8 (DESC 62721) and proposed construction for Well 9, with adjustments based on land surface elevation.

* Licensed drillers are required to attach a Department-supplied Well Tag, with a unique Well ID or Well Tag Number to all new or newly altered wells. Landowners can request a Well ID for existing wells that do not have one. The Well ID is intended to serve as a unique identification number for each well.
 ** A well log ID (e.g. MARI 1234) is assigned by the Department to each log in the agency's well log database. A separate well log is required for each subsequent alteration of the well.
 *** Source aquifer examples: Troutdale Formation, gravel and sand, alluvium, basalt, bedrock, etc.

Yes No The proposed use is for more than **one** cubic foot per second (448.8 gpm) and is not subject to the requirements of OAR 690, Division 86 (Water Management and Conservation Plans).

If **yes**, provide a description of the measures to be taken to assure reasonably efficient water use:

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Statewide - OAR 690-033-0330 thru -0340

Is the well or proposed well located in an area where the Statewide rules apply?

Yes No

If **yes**, and the proposed groundwater use is determined to have the potential for substantial interference with nearby surface waters you are notified that the Water Resources Department will determine whether the proposed use will occur in an area where endangered, threatened or sensitive fish species are located. If so, the Water Resources Department, Department of Fish and Wildlife, Department of Environmental Quality, and the Department of Agriculture will recommend conditions required to achieve “no loss of essential habitat of threatened and endangered (T&E) fish species,” or “no net loss of essential habitat of sensitive (S) fish species.” If conditions cannot be identified that meet the standards of no loss of essential T E fish habitat or no net loss of essential S fish habitat, the agencies will recommend denial of the application unless they conclude that the proposed use would not harm the species.

SECTION 5: WATER USE

USE	PERIOD OF USE	ANNUAL VOLUME (ACRE-FEET)
Municipal	Year-round	1,828-N/A – See Section 10

For irrigation use only: N/A

Please indicate the number of primary, supplemental and/or nursery acres to be irrigated (*must match map*).

Primary: Acres Supplemental: Acres Nursery Use: Acres

If you listed supplemental acres, list the Permit or Certificate number of the underlying primary water right(s):

Indicate the maximum total number of acre-feet you expect to use in an irrigation season:

- If the use is **municipal or quasi-municipal**, attach **Form M Attachment E**
- If the use is **domestic**, indicate the number of households: **N/A** (**Exempt Uses:** Please note that 15,000 gallons per day for single or group **domestic** purposes and 5,000 gallons per day for a single **industrial or commercial** purpose are exempt from permitting requirements.)
- If the use is **mining**, describe what is being mined and the method(s) of extraction (*attach additional sheets if necessary*): **N/A**

SECTION 6: WATER MANAGEMENT

A. Diversion and Conveyance

What equipment will you use to pump water from your well(s)?

Pump (give horsepower and type): **Wells 6 and 7 are equipped with 300 HP and 150 HP soft start pumps, respectively. Well 8 is equipped with a 700 HP VFD.**

Other means (describe):

Check here if the point of appropriation (POA) or place of use (POU) are located within or served by an irrigation or other water district.

Irrigation District Name Central Oregon Irrigation District	Address 1055 SW Lake Rd	
City Redmond	State OR	Zip 97756

SECTION 10: REMARKS

Use this space to clarify any information you have provided in the application (*attach additional sheets if necessary*).

The City of Redmond is submitting this water right application to request a permit to use up to ~~1,828 acre-feet~~ **5.12 cfs** of water from Wells 6 through 11. ~~at a combined maximum rate of up to 5.12 cfs.~~ Wells 6 through 11 are already authorized points of appropriation under the City's existing Permit G-18157, which authorizes the use of up to 3,492 acre-feet at a combined rate of up to 25 cfs. The additional 5.12 cfs proposed for appropriation in this application will increase the maximum rate ~~and volume~~ of use from the proposed wells to meet projected demands through 2043. **To address concerns about the use of water on the capacity of the groundwater resource, the City requests that OWRD further limit the City's authorized use under any permit issued for this application to the total annual volume already authorized under the City's existing groundwater rights, including those evidenced by Inchoate Transfer T-13391, Certificate 82751 (or any subsequent water right, including transfers or certificates), and Permit G-18157 (or any superseding permit or certificate, being a total of 17,877.2 acre-feet, but will not increase the maximum volume of use.**

Additional details regarding the City's projected demands are described in the attached Form M ([Attachment E](#)).

The City understands that the use of water under the proposed permit will require mitigation under the Department's Deschutes Basin Groundwater Mitigation Program. The City currently holds another permit requiring mitigation under the Deschutes Basin Mitigation Program, which required the City to provide mitigation consistent with a 50 percent consumptive use coefficient. The City understands that the Department may make a similar finding with respect to consumptive use. The City holds sufficient unassigned mitigation credits under a variety of mitigation projects to meet the mitigation obligation for a new groundwater permit.

