



**Water Solutions, Inc.**

June 29, 2022

Kim French  
Oregon Water Resources Department  
725 Summer St. NE, Suite A  
Salem, OR 97301-1266

RE Application G-19074, Red Rock Water LLC

Dear Kim:

On behalf of Red Rock Water LLC (Red Rock), GSI Water Solutions, Inc. (GSI) is providing the attached revised Response to Notice of Mitigation Obligation for a groundwater permit (Application G-19074) as a follow-up to our meeting with you and Groundwater Section Manager Justin Iverson on April 11, 2022 and subsequent communications.

Based on our communications we understand that the proposed voluntary cancellation of a 32 portion of an existing groundwater right will meet the offset/mitigation requirement and will also address OWRD's concerns regarding potential impacts to the groundwater resource.

We look forward to working with you to move Application G-19074 forward to a Proposed Final Order proposing to approve the application and to coordinate the execution of the proposed offset. Please contact me at [asussman@gsiws.com](mailto:asussman@gsiws.com) if you have any questions or would like to discuss this application further.

Sincerely,  
GSI Water Solutions, Inc.

A handwritten signature in black ink, appearing to read "Adam Sussman".

Adam Sussman  
Principal Water Resources Consultant

CC: Tiffany Erickson, Red Rock Water, LLC  
Lynn Bruno, DOWL  
Shonee Langford, Schwabe Williamson & Wyatt

Enclosure: Response to Notice of Mitigation Obligation

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**“Revised” RESPONSE TO NOTICE OF MITIGATION OBLIGATION (6/29/2022)**

OAR 690-505-0610(2) states a mitigation obligation may be satisfied by obtaining mitigation credits or by providing for implementation of a mitigation project. Please read and complete the acknowledgment of Mitigation Obligation.

Applicant(s): Red Rock Water LLC

Applicant’s Agent: Leah Cogan, GSI Water Solutions, Inc.

Application number: G-19074

Proposed Use: Quasi-Municipal Use

Period of Use: November 1 through February 28/29

Rate requested: 0.40 CFS

Volume of water requested: 96.0 AF

Mitigation Obligation:            acre feet

Zone of Impact: Crooked River ZOI

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**Please read and initial the following statements:**

\_\_\_\_\_ I/We intend to provide mitigation in the amounts noted above and in the appropriate zone of impact. **(See note below regarding offset)**

\_\_\_\_\_ I/We understand that mitigation must be provided within five years of issuance of the final order for this application. **(See note below regarding offset)**

The proposed mitigation source for this use will be: (please check)

\_\_\_\_\_ Purchase Mitigation Credits    (and/or)    \_\_\_\_\_ A mitigation project resulting in credits

Please describe the type of project, e.g., transfer, etc., and any associated water right certificate, if known:

Red Rock Water LLC (Applicant) is requesting the use of up to 96.0 acre-feet of water for quasi-municipal use under this permit application. The Applicant is proposing to voluntarily cancel a portion of an existing groundwater right on the same property in order to completely offset the impact of use under this groundwater permit application pursuant to OAR 690-505-0610(8). The Applicant holds Certificate 85995, which authorizes the irrigation of 194.6 acres on the same property and has a duty of 3.0 acre-feet per acre of land irrigated. Instead of cancelling a number of irrigation acres that would meet the offset for OWRD’s estimate of consumptive use (16 acres as described in the Response to NOMO dated 5/2/2022) the Applicant proposes to voluntarily cancel a 32-acre portion of Certificate 85995 (32.0 acres x 3.0 acre-feet per acre = 96.0 acre-feet). This proposed offset will meet the offset/mitigation requirement and will also address OWRD’s concerns regarding potential impacts to the groundwater resource.

I understand that I must provide mitigation credits in the amount noted, or a suitable replacement mitigation that meets the requirements of OAR 690-505-0610(2)-(5) in the appropriate zone of impact. **(See note on previous page regarding use of offset)**

Applicant(s)


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or

Applicant's agent

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Date 6/29/2022

Mail to:        Attn: Kim French  
                  Oregon Water Resources Department  
                  725 Summer St NE Suite A  
                  Salem OR 97301-1266

OR

Email to:        Kim.R.French@water.oregon.gov