

From: [Zimmerman, Breean \(ECY\)](#)
To: [EFSEC mi Comments](#)
Subject: Wallula Gap (Wallula Gap Solar, LLC application) comments
Date: Wednesday, May 8, 2024 1:41:24 PM

To whom it may concern,

I'm the statewide Green Energy Permit Coordinator for Washington State Department of Ecology's Water Resources Program. Our Water Resources Program will need clarification on what water source and water use needs are proposed for this project so we can accurately evaluate this project. The application describes a variety of sources (existing water rights, temporary water rights, groundwater exemption), but it isn't clear if the intention is to use all, one, or a combination of these sources.

Information provided in the EFSEC application:

- Dust control is estimated to be 30,000 to 50,000 gallons per day over a 12-18 month construction period.
- Water trucks will be used for dust control.
- Project (the Facility) will obtain water for construction and operation from "existing sources" with a "verified water right".
- "During operation, the Facility is expected to use less than the groundwater permit-exemption well threshold of 5,000 gallons per day, and actual water use is estimated to be approximately 30,000 to 50,000 gallons per panel wash, typically done only once per year if required."
- "The water required for the Facility's construction and operations will come from existing water sources with valid water rights. The applicant will request a temporary construction water use permit from Ecology. Depending on the time of year, water used may come from an existing point of use on a Facility parcel, or from a facility owned by the same landowner about 4.5 miles away. The existing water use permits across the Facility Parcels are currently fully utilized for irrigation or are protected through an in-stream water trust."

My Comments:

1. The estimated water use for dust control purposes is 30,000 to 50,000 gallons per day (12-18 month construction period), this will require a water right.
2. The application references the use of a water right to cover water use needs for construction and operations, however, the application also references a groundwater exemption to potentially be used for operations (e.g. annual panel washing). We'll need more clarification and information here to adequately access the water needs and water availability for this project. Additionally, a water right change may be required if any of the current water right attributes do not align with the project needs (i.e. place of use, point of withdrawal/diversion, purpose of use, etc.).

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