

Application for Underground Artificial Storage and Recovery Reservoir Permit



Form No. ECY 070-634 (Rev 4-2021)

- Schedule a pre-application meeting before you apply.
- Refer to accompanying guidance to complete this form.
- Incomplete applications will be returned.
- All fees are non-refundable (RCW 90.03.470(13)).

Choose a processing option:

- Standard Processing (Department of Ecology). A minimum \$50 fee is required to apply. Additional fees may apply.
- Cost Reimbursement Processing (Ecology approved contractor). Contact Department of Ecology to obtain information on this option.

Submit all applications and fees to:

DEPARTMENT OF ECOLOGY CASHIERING SECTION PO BOX 47611 OLYMPIA, WA 98504-7611 Check the region/office where your project is located.

- Central Region Eastern Region Northwest Region Office of Columbia R
- Office of Columbia River (OCR)*
 Southwest Region

Guidance to Applicants for an Underground Artificial Storage and Recovery Reservoir Permit

Instructions for Form No. ECY 070-634

April 2021 ECY 070-634A

Publication and Contact Information

This guidance document is available on the Department of Ecology's website at:

<u>Guidance to Applicants for an Underground Artificial Storage and Recovery Reservoir Permit</u> https://apps.ecology.wa.gov/publications/SummaryPages/ECY070634A.html

Washington State Department of Ecology — www.ecology.wa.gov

Water Resources Program P.O. Box 47600 Olympia, WA 98504-7600 Phone: 360-407-6872

Region/ Office	Counties served	Mailing Address	Phone
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	15700 Dayton Ave N, Shoreline, WA 98133	206-694-0000
Office of Columbia River	OCR has jurisdiction for designated OCR projects, and new projects located within one mile of the Columbia River.	1250 W Alder St Union Gap, WA 98903	509-457-7141
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Thurston, Skamania, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300

For additional information, contact the Ecology office where your project is located:

To <u>request ADA accommodation</u> including materials in a format for the visually impaired, call Ecology at 360-407-6872 or visit https://ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Guidance to Applicants for an Underground Artificial Storage and Recovery Reservoir Permit

Instructions for Form No. ECY 070-634

Water Resources Program Washington State Department of Ecology Olympia, Washington This page is purposely left blank

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Guidance to Applicants for an Underground Artificial Storage and Recovery Reservoir Permit

Instructions for use with Form No. ECY 040-634 (Rev 4-2021)

Introduction

This document provides guidance to applicants as they prepare the *Application for Underground Artificial Storage and Recovery (ASR) Reservoir Permit.* The application process can be lengthy and complex, and wait times can be significant. Therefore, we strongly encourage applicants to read through this guidance document before preparing the ASR reservoir application.

In this guidance, "Ecology" and "the department" refer to the Department of Ecology unless otherwise qualified. The intent of this document is to ensure that the applicant provides the information an investigator needs (whether from Ecology or a cost reimbursement contractor) to make a decision based on the science, laws, and administrative rules related to reservoir permitting in Washington state.

A completed *Application for Underground Artificial Storage and Recovery Reservoir Permit* consists of the application form, required fees, an attached report addressing application requirements, and various attachments such as maps and other reports. This information is covered in the guidance that follows.

If, in using this guidance document, you are unsure of how to proceed, contact the Ecology office where your proposed project is located for assistance.

How to use this guidance

We have added references to applicable laws, rules, policies, and guidance in several sections in the application. We use these documents when we review and process your application. These references are intended to provide transparency to our process, and to aid you in understanding why we ask for certain material.

- <u>RCW 90.03.370: Underground Artificial Storage and Recovery</u> https://app.leg.wa.gov/RCW/default.aspx?cite=90.03.370
- <u>RCW 90.44.460: Reservoir Permits</u> https://app.leg.wa.gov/RCW/default.aspx?cite=90.44.460
- <u>Chapter 173-157 WAC: Underground Artificial Storage and Recovery</u> https://apps.leg.wa.gov/WAC/default.aspx?cite=173-157
- <u>Schedule of Fees</u> https://app.leg.wa.gov/RCW/default.aspx?cite=90.03.470
- <u>Cost-Reimbursement Agreements</u> https://app.leg.wa.gov/RCW/default.aspx?cite=90.03.265

Processing option you are choosing

There are two processing options available for ASR reservoir permit applications:

Option 1: Standard Processing

Under standard processing, Ecology staff review and process the application and issue the permit decision. Processing time depends on the complexity of the application, the number of competing applications filed before yours, and staff resources.

Option 2: Cost-Reimbursement Processing

You may choose a contractor from a list of cost-reimbursement contractors to process your application, or Ecology will assign one at your request. Ecology must agree to enter into a cost-reimbursement contract with you before a contractor will be retained.

Under cost-reimbursement, the applicant pays the full cost of processing their application. Typically, costs are paid to an approved consultant and Ecology. In some cases, you must pay to process any applications filed earlier than yours (senior applications) for the same body of water. If you decide to have your application processed under cost reimbursement, the \$50 application fee is waived.

Information about the <u>Cost Reimbursement</u> process is available on our website at https://ecology.wa.gov/Water-Shorelines/Water-supply/Water-rights/Cost-reimbursement.

Date of pre-application consultation with Ecology

We strongly recommend pre-application consultation prior to filing your application. Preapplication consultations offer an opportunity to get questions answered and obtain advice on application requirements in order to prevent unnecessary work and expense. If you have completed a pre-application consultation with Ecology, your application should include the date and staff contact for the pre-application meeting.

• <u>Water Right Pre-Application Consultation Form</u> https://apps.ecology.wa.gov/publications/summarypages/ecy070440.html

Fees

Fees are non-refundable: <u>RCW 90.03.470(13)</u>

For standard processing

A minimum fee of \$50 is required to be submitted with your application. For larger impoundments, additional examination fees are required and will be requested by Ecology. You may estimate the total fee by using the <u>Fee Estimator</u> (https://ecology.wa.gov/Water-Shorelines/Water-rights/Fee-estimator).

For cost reimbursement processing

(RCW 90.03.265)

The \$50 application fee to Ecology is waived.

For the examination of an application to store water, a fee of two dollars for each acre foot of storage proposed shall be charged, but a minimum fee of fifty dollars must be paid at the time of application. In no case will the examination fee for a storage project be less than \$50 or more than \$25,000 dollars.

In addition to the examination fee, the applicant is required to bear other costs and fees. For example, publication of a legal notice is required for all applications, and the applicant must bear these publication costs. Additional fees are also required at the time a certificate is issued by Ecology.

Section 1. Applicant Information

Enter the applicant/business name of the person, organization, or water system for which the ASR reservoir permit is requested. For instance, if the permit is required for a public water system, enter the name of the system (e.g., Green Acres Water Works). Enter a mailing address, including zip, daytime telephone, an alternate or cell phone number, and an email address.

Provide the name of a contact person (if different from above) to contact in case Ecology has questions about the application or proposed project. Describe the relationship of the contact person to the applicant, e.g. consultant, water systems engineer, chair of water system, etc.

Section 2. Source and Use

All ASR projects need to identify the source of the water that will be stored for later beneficial use(s). The project name provides Ecology and the applicant a reference that can be convenient when discussing the project with each other and stakeholders.

If you plan to apply the water stored in an ASR project to beneficial use, you are required to apply for a secondary permit under RCW 90.03.370. You are not required to apply for a secondary permit if you already have a water right for the source water that authorizes the proposed beneficial use.

An example would be when a water right issued for industrial use is used for storage and the intended beneficial use for stored water is municipal supply. Secondary permits receive priority under RCW 90.03.370 and may be processed at the same time as the ASR reservoir permit application.

- <u>New Water Right Use Form No. ECY 040-1-14</u> https://apps.ecology.wa.gov/publications/SummaryPages/ECY040114.html
- <u>Application for Change/Transfer of a Water Right Use Form No. ECY 040-1-97</u> https://apps.ecology.wa.gov/ecy/publications/summarypages/ECY040197.html

List any water rights (applications, permits, certificates, or claims) related to this aquifer storage application.

Provide a map displaying the information for this section, including points of diversion, points of withdrawal, and places of use.

Ecology needs to know details of your water rights portfolio, and if there are other water rights or claims that are attached to the proposed place of use in your application. Provide a list of

water rights and identify which attribute (such as place of use or points of withdrawal) shares or overlaps with the requested ASR application. If there are no such rights, enter "NA."

Explain how the water rights provided in this section have been used and how that use relates to the proposed ASR project.

- If no water rights were identified, enter "NA."
- If one or more water rights were identified, provide the information discussed in your pre-application meeting with Ecology, which may include a feasibility study (<u>WAC 173-157-100</u>).

The table below provides an example of the how to provide the requested information.

Name of proposed aquifer storage project: Example: City of Kennewick ASR					
Water Resource Inventory Area (WRIA): 31 WRIA map look-up					
Source water right numbers:	Source of water for project:				
S4-25479C	Treated drinking water from City's municipal water supply system, SW Treatment Plant (Columbia River surface water)				
S4-30976P Treated drinking water from City's municipal water supply system, SW Treatment Plant (Columbia Rive surface water, permit jointly held by cities of Kennewick, Pasco, Richland and West Richland)					
Groundwater Certificate No. 3897-A Treated drinking water from City's municipal water supply system (Groundwater from shallow aquifer adjacent to Columbia River, Ranney Wells 4&5)					
Beneficial use(s) of ASR project water when recovered: Municipal Supply					
Does project require a secondary permit? No If yes, have you submitted an application for a secondary permit? NA					
Will the project discharge recovered water to surface water? No If yes, is a NPDES permit required (WAC 173-157-050)? NA					

If you still have questions about your water rights, contact the appropriate Ecology regional office Water Resources Program staff, referenced in the inside cover page of this guidance.

Section 3. Storage Aquifer Characteristics

This section is used to provide a basic description of the storage aquifer (e.g., aquifer name and extent) as well as basic information of the scope of the project, such as quantity of water to be stored, whether stored water is to be treated (i.e. chlorine, UV, ozone, etc.), and the timing of both storage and recovery cycles.

Provide a map displaying the extent of the storage aquifer and the location of regulated streams.

Section 4. Location of Injection Wells or Recharge Ponds

Describe the location of each injection well or recharge pond that the proposed project will use to provide water to the storage aquifer. All locations should be described using the Quarter-Quarter (QTR-QTR) section within which the feature is located, or parcel number. If the applicant has the GPS location, fill in the LAT/LONG boxes in the table. In the case of ponds that cover multiple QTR-QTR section locations, use the location of the center point of the pond.

If recharge will use spreading rather than wells or ponds, the location should be entered as the QTR-QTR section of the center of the area of spreading.

If you are planning to use an injection well, you are required to register your well with the Underground Injection Control Program according to <u>WAC 173-157-050</u>(4) and Chapter 173-218 WAC. Provide the UIC SITE ID#.

Identify each proposed injection well or recharge pond to the nearest section QTR-QTR or parcel number, if known. In addition, provide a map showing the location(s) relative to cities, major water features, and Water Resource Inventory Area (WRIA) boundaries.

Well(s) located within (QTR- QTR section or parcel no.)	WRIA	Sec	Twp (N)	Rng □ E □ W	Well Tag	LAT	LONG
Well 1R – Parcel 30226-9001	08	19	22	06E	ABC 123	47.3725N	122.0902W
Well 2R – Parcel 192206-9041	08	19	22	06E	ZYX 321	47.3754N	122.0808W
Pond A – NW 1/4 NE 1/4	08	30	22	06E		47.3707N	122.0863W
Pond B – NE 1/4 NE 1/4	08	30	22	06E		47.3710N	122.0824W
Type and capacity of injection wells: Wells 1R and 2R utilize 1,200 gpm injection pumps with Baski control valve to prevent backflow.							
Do you own the property location for the storage method?							
If no, have you secured permission from the owner(s)? 🗌 yes 🔲 no							
Are your underground injection control wells registered according to WAC 173-157-050(4) and Chapter 173-218 WAC? yes no If yes, provide UIC Site ID#:							

The table below provides an example of the how to provide the requested information.

Section 5. Location of Recovery Wells

Accurately identify each proposed recovery well to the nearest QTR-QTR section or parcel number, if known. Provide a map showing the location(s) relative to cities, major water features, WRIA boundaries, and each point of diversion or withdrawal.

Each project is expected to have its own unique infrastructure configuration. Some will have dual purpose injection/recovery wells, while others may utilize separate wells to take advantage of the specific hydrogeological setting in which the project is situated. Other projects may use surface spreading or ponds as a storage method with wells used only for recovery.

Describe the location of each well the proposed project will use to recover water from the storage aquifer. All locations should be described using the QTR-QTR section or parcel number (if known) where the feature is located.

Well(s) located within (QTR-QTR section or parcel no.)	WRIA	Sec	Twp (N)	Rng □ E □ W	Well Tag	LAT	LONG
Well 1R – Parcel 30226-9001	08	19	22	06E	ABC 123	47.3725N	122.0902W
Well 2R – Parcel 192206-9041	08	19	22	06E	ZYX 321	47.3754N	122.0808W
Well 3B – Parcel 202206-9152	08	20	22	02E	ABC 124	47.3733N	122.0755W
Horizontal datum 🛛 WGS84 🔄 NAD83 🗌 NAD27 🔲 OTHER (DESCRIBE)							
Do you own the property location(s) for the recovery wells? \square yes \square no							
If no, have you secured permission to access the property from the owner(s)? 🗌 yes 🔲 no							

Section 6. Place of Use for Recovered Water

Public Water systems describe their place of use as the service area within the most recently approved (by Department of Health) Water System Plan and include a map of the approved service area. The service area map should include county and WRIA boundaries in addition to major surface water and transportation features.

Irrigation Districts may describe their delivery area as the boundaries adopted through incorporation of the district with reference to the Townships, Ranges and Sections within the area. A map of the Irrigation District boundaries should include Township, Ranges, WRIA and county boundaries, as well as major surface water and transportation features.

All other applicants need to attach a legal description of the lands where you propose to use the water or copy it carefully in the space provided. You can usually obtain a legal description from a survey, county assessor's office, real estate contract, title insurance policy, or property deed. Also include the tax parcel number(s) if available.

Check if you own all of the lands on which the proposed place of use is located. If you do not own the lands, provide the owner's name(s), address and phone number.

Note: Additional landowner's signature is required in Section 8.

Section 7. Maps and Other Documentation

The following table outlines the minimum supporting documentation required with your application. Where a response requires attached documentation, identify the section number that applies to the document.

Further information on each section is provided below.

Section	Required information	Reference(s)
7.1	 A map showing: The proposed aquifer storage reservoir project Source diversion and/or withdrawal locations Any associated injection and recovery wells, ponds, and spreading areas Any associated place(s) of use Estimated area where water will be stored within the storage aquifer Well monitoring network locations Nearby hazards 	WAC 173-157 -120 through 170
7.2	If platted property, a complete copy of the plat map.	
7.3	A conceptual model of the hydrogeological setting, prepared by a hydrogeologist licensed in the state of Washington.	WAC 173-157-120
7.4	An operational plan of the proposed project, prepared by an engineer or a geologist licensed in the state of Washington.	WAC 173-157-130
7.5	A description of the legal framework of the proposed project.	WAC 173-157-140
7.6	An environmental assessment and analysis for the proposed project. A copy of SEPA Threshold Determination, if applicable.	WAC 173-157-150
7.7	A mitigation plan for the proposed project, if required. The mitigation plan must be reviewed and approved or prepared by an appropriately experienced engineer licensed in the state of Washington.	WAC 173-157-160
7.8	A monitoring plan for the proposed project.	WAC 173-157-170

Section	Required information	Reference(s)
7.9	Provide a timeline for your development schedule.	

7.1 Project Map

In addition to the maps required in Sections 2, 3, 4, 5, and 6, provide your project map, showing:

- The proposed aquifer storage reservoir project area
- Source diversion and/or withdrawal locations
- Any associated injection and recovery wells, ponds, and spreading areas
- Any associated place(s) of use
- Estimated area where water will be stored within the storage aquifer
- Well monitoring network locations
- Nearby hazards



7.2 Attach a Plat Map

If the property is platted, provide a <u>complete copy</u> of the plat map.

7.3 Conceptual Model

WAC 173-157-110 requires a conceptual model of the hydrogeologic system be prepared by a hydrogeologist licensed in the state of Washington. The requirements are described in WAC 173-157-120

What must I include in the hydrogeologic system description?

Your hydrogeologic system description must include a conceptual hydrogeologic model that describes:

- 1) The aquifer targeted for storage, to include at a minimum estimates for:
 - a) Lateral and vertical extent;
 - b) Whether the aquifer is confined or unconfined;
 - c) Permeability;
 - d) Total storage volume available;
 - e) Effective hydraulic conductivity;
 - f) Transmissivity; and
 - g) Potential for physio-chemical changes in the aquifer or vadose zone as a consequence of recharge.
- 2) The estimated flow direction(s) and rate of movement.
- 3) The anticipated changes to the groundwater system due to the proposed ASR project.
- 4) The estimated area that could be affected by the project.
- 5) The general geology in the vicinity of the proposed project, including stratigraphy and structure.
- 6) The locations of existing documented natural hazards that could be affected or exacerbated by the project, such as landslide-prone areas or areas of subsidence along with a plan to mitigate such conditions or impacts.
- 7) The locations of surface waters such as springs, creeks, streams or rivers that could be affected by the ASR project.
- 8) The locations of all wells or other sources of groundwater of record within the area affected by the project.
- 9) The chemical and physical composition of the source water(s) and their compatibility with the naturally occurring waters of the receiving aquifer.

7.4 Operational Plan

WAC 173-157-110 requires an operational plan be prepared by an engineer or a geologist licensed in the state of Washington. The requirements are described in WAC 173-157-130.

What must I include in the project operation plan?

Your project operation plan should include, at a minimum, the following information:

- 1) The quantity and times of year source water is available for recharge.
- 2) The proposed rate of injection and withdrawal of water.
- 3) The length of time the water is proposed to be stored.

- 4) The location, number, and capacity of proposed recharge wells or infiltration basins, and recovery facilities.
- 5) Any variability in quality and reliability of the source water.
- 6) A description of any water treatment method(s) you will use at the time of injection and recovery to ensure compliance with the water quality standards set forth in <u>WAC</u> <u>173-200</u>, as well as the department's anti-degradation policy.
- 7) Any plans to discharge ASR water to a surface body should include information on the quantity, timing, duration, and water quality parameters such as chlorine, pH and dissolved oxygen of the ASR discharge water.
- 8) Any operation and maintenance plans to discharge groundwater and suspended sediment from the ASR well shall provide information on the quantity, duration, quality, and means of discharge.
- 9) Destination(s) and permitting for water used for operation and maintenance (e.g., flushing water).

7.5 Legal Framework

What must I include in the description of the legal framework?

Your description of the legal framework should include, at a minimum:

- 1) Documentation of the water rights for the source waters intended to be stored for the proposed ASR project.
- 2) A list of other water rights within the ASR project area.
- 3) Instream flows established by the department or stream closures in the vicinity of the point of diversion/withdrawal of the source water and/or within the ASR project area.
- 4) Ownership and control of any facilities to be used for the proposed project.

7.6 Environmental Assessment and State Environmental Policy Act (SEPA) Requirements

What must I include in the environmental assessment and analysis?

Your environmental assessment and analysis must, at a minimum, describe:

- 1) The environment within the ASR project area, including:
 - a) Proximity to contaminated areas;
 - b) Present and prior land use(s) within the ASR project area;
 - c) Location(s) of historical or existing wetland habitat(s);
 - d) Location(s) of historical or existing flood plain(s);
 - e) Location(s) of historical or existing surface water body or spring, including documented:
 - i. Base flows;
 - ii. Seven-day low flows;
 - iii. Maximum flows.
- 2) Adverse impacts to the surrounding environment by the ASR project, including, but not limited to:

- a) Slope stability;
- b) Wetland habitat;
- c) Flood plain;
- d) Ground deformation;
- e) Surface water body or spring.
- 3) If an environmental assessment has already been performed for the purposes of this specific ASR project, the application may simply refer to that documentation and need not repeat that analysis.

What must I include for SEPA?

Attach a copy of any SEPA checklists or environmental analyses related to this project with this application

In the case of an ASR project, there may be various combinations of diversions (e.g., to intercept water during high flow periods for the purpose of injecting or infiltrating it underground) and withdrawals to pump it out for use. The sum total of the diversion and withdrawal rate should be considered when evaluating the threshold criteria below:

- It is a surface water right application for more than 1 cubic feet per second <u>WAC</u> <u>197-11-800 (4)</u>. If the project is for agricultural irrigation, the threshold is increased to 50 cubic feet per second, so long as the project will not receive public subsidies;
- It is a groundwater right application for more than 2,250 gallons per minute <u>WAC</u> <u>197-11-800 (4)</u>;
- It is an application combined with other water right applications for the same project, exceeds the amounts above:
- It is a part of a larger proposal that is subject to SEPA for other reasons (e.g., the need to obtain other permits that are not exempt from SEPA);
- It is part of a series of exempt actions that, considered together, trigger the need to do a threshold determination, as defined under <u>WAC 197-11-305</u>.

7.7 Mitigation Plan

What must I include in the project mitigation plan?

If Ecology requires a mitigation plan, your plan must be reviewed and approved or prepared by an appropriately experienced engineer licensed in the state of Washington (WAC 173-157-160). The mitigation plan shall prescribe actions to be taken to prevent adverse impacts to the environment and methods for evaluation of the effectiveness of these actions (RCW 90.03.370(2)).

If you have reached agreement with any other parties to mitigate or compensate for the impacts of your project, list and summarize the agreements here.

7.8 Monitoring Plan

What must I include in the project monitoring plan?

Your project monitoring plan, which will be utilized to evaluate and verify the assumptions in the conceptual model, during the pilot and operational phases, must include the following:

1) Proposed time intervals for sampling and subsequent reporting.

- 2) Descriptions of measurement methodology, threshold values, and evaluation techniques for the following criteria:
 - a) The quality of the source and receiving waters. This information must be provided for the period or periods of the year when the water will be stored. Testing must be done by a laboratory certified by either the department or DOH.
 - b) The actual quantity of water injected.
 - c) Changes in groundwater piezometric elevations in the receiving aquifer.
 - d) The percentage of the initial amount of stored water that is recoverable after varying lengths of storage time to validate the estimates of the amount of stored water that is actually recovered.
 - e) Data necessary to evaluate the effectiveness of required mitigation.
 - f) Other data you or the department determine necessary for monitoring the ASR project and adverse impacts.

You must provide a report of the monitoring data, at least annually, to the department. Based on the complexity of the project, the department may require you to comply with a more frequent reporting schedule. The required reporting frequency will be specified in the reservoir permit.

7.9 Provide a timeline for your development schedule

Provide a general timeline that includes the steps needed to begin the project, complete the project, and put the water to full beneficial use.

If your application for a new water right permit is approved, describe how long it will take for you to:

- Start the project
- Construct all infrastructure to allow for full use of the water right
- Fully use the rate and volume of water authorized under the water right

Do not include specific dates in this response, but instead identify how many months/years it will take to achieve each development step from the date you are notified you can proceed. For instance, you might enter one year, two years, and five years, if it will take one year to begin the project, another year to construct the project, and three more years to put the water to full use, which equals five years total). Your schedule should present the amount of time necessary to fully complete your project, including time to address unforeseen circumstances. If you are issued a permit but cannot meet the project development deadlines, you may be able to request an extension under RCW 90.03.320. If you do not complete your project according to the timelines indicated in your permit and do not request or receive an extension of these deadlines, your permit may be cancelled.

Section 8. Signatures

The following parties **must** sign the permit application:

- Applicant (or authorized representative)
- Legal Owner or Part-Owner Place of Use

All **property** owners within the proposed place of use must sign the application. If you do not have the signatures of all property owners, do not submit the application. For water rights proposed to serve water to customers, such as public water systems, municipal water suppliers, and irrigation districts, it is only necessary to include the signature of organization's authorized representative.

If there are multiple owners such as LLCs that are owned by the applicant, include supporting documents (such as corporation ownership information from the Washington Secretary of State's <u>Corporations and Charities Filing System</u> (https://ccfs.sos.wa.gov/#/) to explain the relationship between the legal land owners and applicant, if any.