STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

CHANGE REPORT OF EXAMINATION

Ground Water Certificate No. G3-22797C

PRIORITY DATE	APPLICATION NO.	PERMIT NO.	CERTIFICATE NO.
March 1, 1974	G3-22797	G3-22797P	G3-22797C

NAME
City of Newport

ADDRESS/STREET	CITY/STATE	ZIP CODE
200 South Washington Avenue	Newport, WA	99156

PUBLIC WATERS TO BE APPROPRIATED

SOURCE

Seven (7) wells

TRIBUTARY OF (IF SURFACE WATERS)

MAXIMUM CUBIC FEET PER SECOND (cfs)	MAXIMUM GALLONS PER MINUTE (gpm)	MAXIMUM ACRE FEET PER YEAR (ac-ft/yr)
---	344	550

QUANTITY, TYPE OF USE, PERIOD OF USE

344 gallons per minute, 550 acre-feet per year, continuously, for municipal supply

Existing water rights for the City of Newport authorize a total withdrawal of 684 gallons per minute and 1098 acre-feet per year, continuously, for municipal supply (under Ground Water Certificate Nos. G3-22797C, G3-25887C and G3-26830C).

LOCATION OF DIVERSION/WITHDRAWAL

APPROXIMATE LOCATION OF DIVERSION--WITHDRAWAL

Well Locations:

B) SE¼NE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
465 feet north and 330 feet west of the E¼ corner of Sec. 24
D) NE¼SE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
50 feet south and 1250 feet west of the E¼ corner of Sec. 24
E) NE¼SE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
45 feet south and 1230 feet west of the E¼ corner of Sec. 24
F) SE¼NE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
450 feet north and 650 feet west of the E¼ corner of Sec. 24
G) SE¼NE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
430 feet north and 800 feet west of the E¼ corner of Sec. 24
H) NE¼ of Sec. 24, T. 31 N., R. 45 E.W.M.
70 feet south and 70 feet east of the N¼ corner of Sec. 24
J) SW¼SW¼ of Sec. 19, T. 31 N., R. 46 E.W.M.
1100 feet north and 450 feet east of the SW corner of Sec. 19

LOCATED WITHIN (SMALLEST LEGAL SUBDIVISION)	SECTION	TOWNSHIP	RANGE	WRIA	COUNTY
---	24 19	31 N. 31 N.	45 E.W.M. 46 E.W.M.	62	Pend Oreille

LEGAL DESCRIPTION OF PROPERTY ON WHICH WATER IS TO BE USED
[Attachment 1 shows location of the authorized place of use and point(s) of diversion or withdrawal.]

Area served by the City of Newport Municipal Supply System within Pend Oreille County, Washington and Bonner County, Idaho. The place of use (POU) of this water right is the service area described in the most recent Water System Plan approved by the Washington State Department of Health, so long as the City of Newport is and remains in compliance with the criteria in RCW 90.03.386(2). RCW 90.03.386 may have the effect of revising the place of use of this water right.

DESCRIPTION OF PROPOSED WORKS

Seven wells, pumps, reservoirs and pressure distribution system

DEVELOPMENT SCHEDULE

BEGIN PROJECT BY THIS DATE	COMPLETE PROJECT BY THIS DATE	WATER PUT TO FULL USE BY THIS DATE
April 1, 2010	April 1, 2012	April 1, 2030

PROVISIONS

Quantity Limits, Flow and Regulation:

1. This change authorizes seven (7) points of withdrawal in the amounts of 344 gallons per minute; 550 acre-feet per year, continuously, each year, for municipal supply under Ground Water Certificate No. G3-22797C.

2. Existing water rights for the City of Newport authorize a total withdrawal of 684 gallons per minute and 1098 acre-feet per year, continuously, for municipal supply (Under Ground Water Certificate Nos. G3-22797C, G3-25887C and G3-26830C).

3. This certificate, as it relates to lands within the State of Idaho, is issued subject to the limitation that the authority granted herein shall remain in effect only until such time as it is determined by the Department of Ecology that such water is required for municipal supply or other purposes on lands in the State of Washington; provided however, that said limitation shall no longer be effective if the State of Idaho adopts a reciprocity policy which complies with the intent of RCW 90.03.300.

Municipal Supply and Public Water Systems:

4. If the criteria in RCW 90.03.386(2) are not met and a Water System Plan/Small Water System Management Program was approved after September 9, 2003, the place of use of this water right reverts to the service area described in that document. If the criteria in RCW 90.03.386(2) are not met and no Water System Plan/Small Water System Management Program has been approved after September 9, 2003, the place of use reverts to the last place of use described by Ecology in a water right authorization.

5. Prior to any new construction or alterations of a public water supply system, the State Board of Health rules require public water supply owners to obtain written approval from the Office of Drinking Water of the Washington State Department of Health. Please contact the Office of Drinking Water prior to beginning (or modifying) your project at Eastern Drinking Water Operations, 23403 E. Mission Avenue, Suite 114, Liberty Lake, WA 99019, (509) 456-3115.

Wells, Well logs and Well Construction Standards:

6. All wells constructed in the State shall meet the construction requirements of chapter 173-160 WAC entitled "Minimum Standards for the Construction and Maintenance of Wells" and chapter 18.104 RCW titled "Water Well Construction".

7. In accordance with chapter 173-160 WAC, wells shall not be located within certain minimum distances of potential sources of contamination. These minimum distances shall comply with local health regulations, as appropriate. In general, wells shall be located at least 100 feet from sources of contamination. Wells shall not be located within 1,000 feet of a solid waste landfill.

8. A completed well report of the new well shall be submitted by the driller to the Department of Ecology within 30 days of completing the well authorized herein. All pump test data for the well shall be submitted to the Department as it is obtained.

9. The new well should be tagged with a well identification number. This unique well number shall remain attached to the well. Please reference this number when submitting data.

10. Installation and maintenance of an access port as described in chapter 173-160 WAC is required. An air line and gauge may be installed in addition to the access port.

11. Well C and Well I will no longer be used by the City of Newport. Therefore, both wells shall be decommissic in accordance with Chapter 173-160-381 WAC.

General Conditions:

12. The water source and/or water transmission facilities are not wholly located upon land owned by the applicant. Issuance of a water right change authorization by this department does not convey a right of access to, or other right to use, land which the applicant does not legally possess. Obtaining such a right is a private matter between applicant and owner of that land.

13. Use of water under this authorization shall be contingent upon the water right holder's maintenance of efficient water delivery systems and use of up-to-date water conservation practices consistent with established regulation requirements and facility capabilities.

Schedule and Inspections:

14. Department of Ecology personnel, upon presentation of proper credentials, shall have access at reasonable times, to the project location, and to inspect at reasonable times wells or diversions and associated distribution systems for compliance with water law.

Measurements, Monitoring, Metering and Reporting:

15. An approved measuring device shall be installed and maintained for each of the sources identified herein in accordance with the rule "Requirements for Measuring and Reporting Water Use," Chapter 173-173 WAC. Water use data shall be recorded weekly and maintained by the property owner for a minimum of five years, and shall be promptly submitted to Ecology upon request.

16. Department of Ecology personnel, upon presentation of proper credentials, shall have access at reasonable times, to the records of water use that are kept to meet the above conditions, and to inspect at reasonable times any measuring device used to meet the above conditions.

17. Chapter 173-173 WAC describes the requirements for data accuracy, device installation and operation, and information reporting. It also allows a water user to petition Ecology for modifications to some of the requirements. Installation, operation and maintenance requirements are enclosed as a document entitled "Water Measurement Device Installation and Operation Requirements". http://www.ecy.wa.gov/programs/wr/measuring/measuringhome.html

FINDINGS OF FACT AND ORDER

Upon reviewing the investigator's report, I find all facts relevant and material to the subject application have been thoroughly investigated. Furthermore, I find the change of water right as recommended will not be detrimental to existing rights.

Therefore, I ORDER approval of the recommended change to add one point of withdrawal under Ground Water Certificate No. G3-22797C, subject to existing rights and the provisions listed above.

You have a right to appeal this Order. To appeal this you must:

- File your appeal with the Pollution Control Hearings Board within 30 days of the "date of receipt" of this document. Filing means actual receipt by the Board during regular office hours.
- Serve your appeal on the Department of Ecology within 30 days of the "date of receipt" of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). "Date of receipt" is defined at RCW 43.21B.001(2).

Be sure to do the following:

- Include a copy of this document that you are appealing with your Notice of Appeal.
- Serve and file your appeal in paper form; electronic copies are not accepted.

1. To file your appeal with the Pollution Control Hearings Board

Mail appeal to:		Deliver your appeal in person to:
The Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903	OR	The Pollution Control Hearings Board 4224 – 6th Ave SE Rowe Six, Bldg 2 Lacey, WA 98503

2. To serve your appeal on the Department of Ecology

Mail appeal to:		Deliver your appeal in person to:
The Department of Ecology Appeals & Application for Relief Coordinator PO Box 47608 Olympia, WA 98504-7608	OR	The Department of Ecology Appeals & Application for Relief Coordinator 300 Desmond Dr SE Lacey, WA 98503

3. And send a copy of your appeal to:

Keith L. Stoffel
Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205

Signed at Spokane, Washington, this 17th day of June, 2009.

Keith L. Stoffel, Section Manager
Water Resources Program
Eastern Regional Office

INVESTIGATOR'S REPORT

BACKGROUND

An application for change was submitted by the City of Newport, Washington to the Department of Ecology on December 19, 2006. The applicant proposes to add one point of withdrawal as granted under Ground Water Certificate G3-22797C. The current authorized points of withdrawal are eight (8) wells identified by the City of Newport as Wells B, C, D, E, F, G, H and I. The applicant proposes to add a Well J in the SW¼SW¼ of Sec. 19, T. 31 N., R. 46 E.W.M. Wells C and I will be decommissioned after Well J is constructed leaving a total of seven wells after this change. The proposed wells will be located as follows: Existing wells B) in the SE¼NE¼ of Sec. 24, D) in the NE¼SE¼ of Sec. 24, E) in the NE¼SE¼ of Sec. 24, F) in the SE¼NE¼ of Sec. 24, G) in the SE¼NE¼ of Sec. 24, H) in the NE¼ of Sec. 24, ALL IN T. 31 N., R. 45 E.W.M. and new well J) in the SW¼SW¼ of Sec. 19, T. 31 N., R. 46 E.W.M.

A notice of application was duly published in accordance with RCW 90.03.280 in the Newport Minor on March 7 and 14, 2007 and no protests were received.

This application is categorically exempt from the provisions of the State Environmental Policy Act (SEPA) of 1971, Chapter 43.21C RCW.

Attributes of Ground Water Certificate No. G3-22797C

Recorded Name:	City of Newport
Priority Date:	March 1, 1974
Instantaneous Quantity – Q(i):	344 gallons per minute
Annual Quantity – Q(a):	550 acre-feet per year
Source:	Eight (8) wells
Point of withdrawal:	Wells B, C, D, E, F, G, H and I See Change ROE dated March 27, 1997
Purpose of Use:	Municipal Supply
Period of Use:	Continuous
Place of Use:	Area served by the City of Newport Municipal Supply System within Pend Oreille County, Washington and Bonner County, Idaho

INVESTIGATION

A field investigation for this change application was conducted by Gene Drury with Ray King (Administrator - City of Newport) and Kevin Koesel (Engineer - James A. Sewell & Associates) on September 26, 2007. In considering the proposed change, the investigation included, but was not limited to, research and review of: (1) appropriate rules and statutes, (2) Ground Water Certificate G3-22797C and other water rights/claims/applications in the vicinity, (3) water well reports for the applicant's wells, (4) USGS topographic maps, (5) Comprehensive Water System Plan for City of Newport/West Bonner Water District #1 prepared by Welch Comer & Associates in 2001, (6) Wellhead Protection Plan Phase I, Welch, Comer & Associates, Inc, May 1994 (7) discussions with the City of Newport, and (8) discussions with Department of Ecology regional program staff.

ADVISORY

Please be aware the "municipal supply purposes" definition and "good standing" sections of the Municipal Water Use Efficiency Act of 2003 have been deemed unconstitutional by King County Superior Court. King County Superior Judge Jim Rogers provided an oral ruling on June 11, 2008 in Lummi Indian Nation, *et al.* v. State, the facial challenge to the constitutionality of the 2003 Municipal Water Law. The Court ruled that three MWL provisions violate separation of powers under the state Constitution: RCW 90.03.015(3) and (4), (definitions) and RCW 90.03.330(3) ("good standing"). Ecology has appealed this decision to the Washington State Supreme Court. A final decision from the Supreme Court may not be issued for some time and their decision may impact the status of the inchoate water currently held by the City of Newport in its water right certificates.

TENTATIVE DETERMINATION OF EXTENT AND VALIDITY OF WATER RIGHTS

Historically, the City of Newport (City) has served water to residential service connections under each of the City's three water rights and Ecology considers it a municipal water supplier at this time. Ground Water Certificate Nos. G3-22797C, G3-25887C and G3-26830C were issued to the City of Newport as so-called "pumps and pipes" certificates. They were issued based on water system capacity, rather than on the actual beneficial use of water.

In 1992, the City made application to the Department to change each of its existing ground water rights to integrate the system and add more wells. This request was granted by Ecology on March 27, 1997.

The 1997 integration allowed the City to withdraw water from any or all of its wells under each water right. Newport currently has eight existing municipal supply wells authorized under water rights and identified as follows: Wells B, C, D, E, F, G, H and I. Newport does not plan to retain Wells C and I under this application due to problems with water quality and yield.

The existing ground water rights for the City of Newport authorize a total withdrawal of 684 gallons per minute and 1,098 acre-feet per year, continuously, for municipal supply purposes. The City pumps ground water from its municipal supply wells but also receives surface water from West Bonner Water and Sewer District #1 in Idaho. The City and West Bonner have an agreement to use each others water sources. The City maintains that the majority of its unused water rights from its municipal supply wells have been held for back-up to the spring water sources from Idaho. Eventually, Newport will no longer rely on the surface water source from Idaho. According to Mr. King and Mr. Koesel, the Washington State Department of Health, Drinking Water Division has recommended that the City of Newport move their water use from the springs to its ground water sources. The City hopes that a new Well J will provide the City with adequate water and good quality so it can discontinue the use of surface water.

The population of Newport and West Bonner has steadily increased over the years. The current population of Newport is 2,157 persons, an increase of 466 people since 1990. The population forecast is for approximately 2,729 persons in Newport by the year 2020. The City of Newport has plenty of water under existing water rights for this estimated growth. The City claims it will need this remaining unused water as the surface water will no longer be available. Water use for the City of Newport is provided in Table 1 below. Ground water is also pumped from the City's wells and used within the State of Idaho.

TABLE 1
WATER USE – City of Newport

YEAR	GALLONS PUMPED[1]	ACRE-FEET PUMPED[1]	*GALLONS USED*[2]	ACRE-FEET *USED*[2]
2002	48,147,600	148	189,020,100	580
2003	57,530,800	177	187,800,800	576
2004	51,646,130	158	170,166,130	522
2005	49,332,110	151	160,422,110	492
2006	55,943,170	172	182,463,170	560

[1]City of Newport wells (ground water only) [2]City of Newport total water use (ground water & surface water)
Note: Additional water is used in the state of Idaho (Table 1 indicates water use in WA only).

Based on the water use data, the City has perfected the instantaneous quantity and 177 acre-feet of the annual quantity through actual beneficial use of water under its ground water rights. Further, the water use data demonstrate that the City has continued to use the portions of its water rights that it has perfected so that no relinquishment or abandonment of its perfected rights has occurred. Thus, the portions of its water rights authorizing 177 acre-feet of water that has been perfected by the City are valid and eligible for change.

The water use data indicate that the City has not perfected its full allocation of water, leaving approximately 921 acre-feet of inchoate (or unused) water available for future use under its water rights. Actually, when the City stops receiving surface water from West Bonner, only 340 acre-feet of inchoate water would be available. The City has stated that it needs this water for future development. The status of the remaining quantity of inchoate ground water under Newport's water rights is in question until the Supreme Court decisions are rendered.

Water right holders must still meet other requirements in the Water Code such as due diligence in project development. The Department recognizes that cities often grow at uneven rates and need to be able to serve their growing populations. Over the last ten years, the population of the City of Newport has increased, as has its use of water. Although the City has been receiving surface water from West Bonner, it has been actively pursuing development of a new water source in order to make use of the remaining inchoate portion of its ground water rights. The City's continued growth and its efforts to actively pursue new ground water sources to make further use of the inchoate quantities remaining under its water rights demonstrate that the City has exercised reasonable diligence in developing its inchoate water rights and that the remaining inchoate portions available under all its water rights are in good standing.

Proposed Use

The City of Newport proposes to construct a new Well J. After discussions with Mr. King and Mr. Koesel, the City has chosen a site for the new well to be located within the SW¼SW¼ of Sec. 19, T. 31 N., R. 46 E.W.M. After the proposed change and construction of Well J, the City plans to decommission Wells C and I. This will leave the City with a total of these seven (7) wells: Existing Wells B, D, E, F, G, H, and new Well J.

Other Rights Appurtenant to the Place of Use

A search was conducted for existing water rights, permits and claims in the surrounding area of the proposed well. Additionally, the City was asked about other domestic exempt wells in the area and a search of these was also conducted. It appears that the nearest well is the "Pat Geary" well located in the NE¼SE¼ of Sec. 19. According to Mr. King, this well is over 1,000 feet from the proposed Well J site. The Geary well was constructed in 1994 to a depth of 353 feet through sand, gravel and decomposed granite and produced about 5 gallons per minute. The well was cased 313 feet and has a static water level of 215 feet below the top of the well. The new City Well J will be located south of the City and away from any other domestic wells. The search found no existing water rights or users in the area.

The City of Newport's three Ground Water Certificates for municipal supply purposes are as follows:

TABLE 2
CITY OF NEWPORT WATER RIGHTS

WATER RIGHT	PRIORITY DATE	Q(i)	Q(a)	USE
G3-22797C	March 1, 1974	344	550	Municipal Supply
G3-25887C	March 20, 1978	70	112	Municipal Supply
G3-26830C	March 4, 1981	270	436	Municipal Supply
TOTAL:		**684**	**1,098**	

Q(i) = instantaneous quantity in gallons per minute; Q(a) = annual quantity in acre-feet per year (af/yr)

The Report of Examination under Ground Water Certificate G3-26830C was issued to the City of Newport with an error in the total annual quantity. G3-26830C incorrectly listed the annual water right total at 662 acre-feet per year and should actually have been 1098 acre-feet per year as noted above. Ground Water Certificate G3-26830C was clearly for additional instantaneous and annual quantities as noted in page one of the original Report of Examination dated October 4, 1983. The Report of Examination states that; "*This application requests additional instantaneous, annual acre footage and a new well.*" This is consistent with the application, which clearly indicates a request for 565 acre-feet per year of water for municipal use and a projected 20 year population of 4,765 persons in 1981. The City has requested that this error be corrected through these applications for change.

The certificate was issued and slightly reduced the original permitted instantaneous quantity of 350 gallons per minute to 270 gallons per minute. The maximum amount which can be pumped at that rate is actually 436 acre-feet per year. Certificate G3-26830C will need to be reduced from 560 acre-feet per year to 436 acre-feet per year. This leaves the total annual quantity under the three City of Newport water rights at 1098 acre-feet per year. The error was discussed with Keith Stoffel, Water Resources Section Manager in Eastern Regional Office and it was agreed that the error was in fact administrative and should be corrected. The correction will not affect the original decision as the full amounts were used in the Department's determination of water availability, impairment and public interest. Therefore, this administrative error will be corrected through this new change application and the others filed by the City of Newport.

Hydrologic/Hydrogeologic Evaluation

Applications for change of water right permits and certificates are governed by RCW 90.44.100, which states in part that: the holder of a valid right to withdraw public ground waters may, without losing his priority of right, construct wells at a new location in substitution for, or in addition to, those at the original location, or he may change the manner or the place of use of the water. Such amendment shall be issued by the Department only on the conditions that: (1) the additional or substitute well or wells shall tap the same body of public ground water as the original well or wells; (2) use of the original well or wells shall be discontinued upon construction of the substitute well or wells; (3) the construction of an additional well or wells shall not enlarge the right conveyed by the original permit or certificate; and (4) other existing rights shall not be impaired. The Department may specify an approved manner of construction and shall require a showing of compliance with the terms of the amendment.

Wells D and E are the primary wells used by the City of Newport. The other wells are used seasonally or kept as backup wells with the exception of Wells C and I. Well C has water quality problems with high iron content while

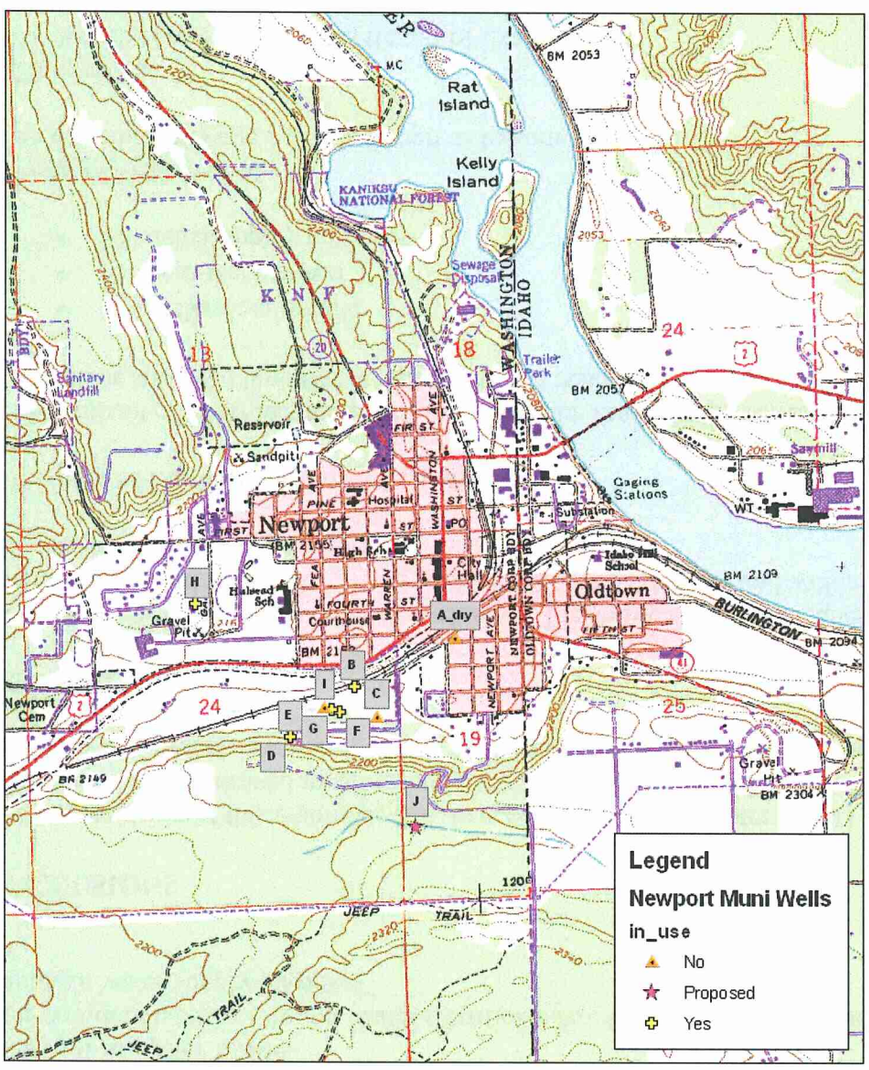
Well I is a low producing well. These two wells will no longer be used by the City. Therefore, they will have to be decommissioned according to Chapter 173-160-381 WAC.

The existing City of Newport wells are further described as follows:

CITY OF NEWPORT WELLS

Well#	Well ID	Year	Depth	Diameter	Casing	SWL	Pump	HP	GPM
B	AHC032	1974	76	8	51	6	sub	7.5	180
D	AHC030	1978	67	8	56	6	sub	20	260
E	AHC031	1990	105	10	90	21	sub	15	150
F	AHC027	1990	80	8	70	19	sub	7.5	120
G	AHC028	?	90	8	?	?	sub	7.5	120
H	AHC033	1995	160	8	70	21	sub	7.5	70

The eight wells currently being used by the City are all producing water from an unconfined sand and gravel aquifer. The unconsolidated sediments overlie a granitic basement complex. Well "F" tagged decomposed granite at a depth of 105'. These wells are all producing water from the same body of public groundwater. The proposed new well (J) located in the SW¼SW¼ of Sec. 19, T. 31 N., R. 46 E.W.M. will need to be completed within the unconsolidated sediments.



Impairment Considerations

"Impair" or "impairment" means to: 1) adversely impact the physical availability of water for a beneficial use that is entitled to protection, including earlier filed applications, and/or 2) to prevent the beneficial use of the water to which one is entitled, and/or 3) to adversely affect the flow of a surface water course at a time when the flows are at or below instream flow levels established by rule (POL-1200), and/or 4) degrade the quality of the source to the point that water is unsuitable for use by existing water right holders (WAC 173-150). Demonstration of impairment would require evidence of a substantial and lasting or frequent impact reflecting such conditions.

No significant increase in pumping rates is proposed and there has been no documented history of pumping interference between existing wells in this area, therefore it is not anticipated that this change would cause any impairment to existing water rights.

Public Interest Considerations

There has been no public expression of protest or concern regarding the subject proposal, and no findings through this investigation indicate that there would be any detrimental impact to the public welfare through issuance of the proposed change.

Consideration of Protests and Comments

No protests were received.

Same Source of Water
The additional well will withdraw from the same body of public ground water and may be added under this certificate under RCW 90.44.100.

Municipal Supplier Status
Water withdrawn under Ground Water Certificate No. G3-22797C has historically been considered to be for "municipal water supply purposes".

CONCLUSIONS

It is the conclusion of this examiner that, in accordance with Chapters 90.03 and 90.44 RCW, this application to add one point of withdrawal under Ground Water Certificate G3-22797C will not enlarge the quantity of water historically authorized, nor will it impair existing rights provided the terms and conditions below are followed.

RECOMMENDATIONS

Based on the above investigation and conclusions, I recommend that the request to add one point of withdrawal under Ground Water Certificate G3-22797C be approved in the amounts and within the limitations listed below and subject to the provisions beginning on Page 2.

Purpose of Use and Authorized Quantities

The amount of water recommended is a maximum limit and the water user may only use that amount of water within the specified limit that is reasonable and beneficial:

- 344 gallons per minute
- 550 acre-feet per year
- Municipal supply purposes

Point of Withdrawal
As described on Page 1 of this Report of Examination.

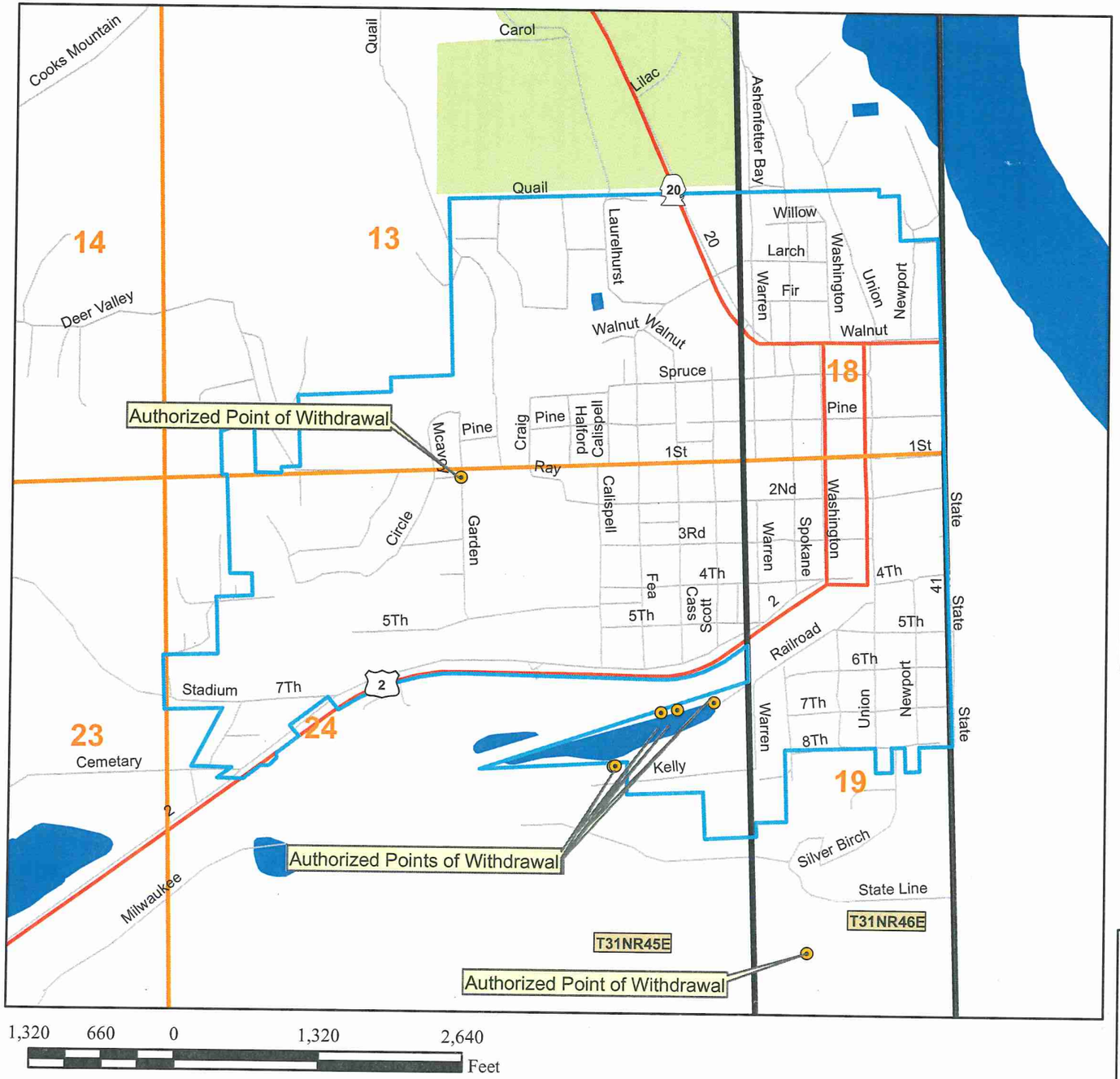
Place of Use
As described on Page 1 of this Report of Examination.

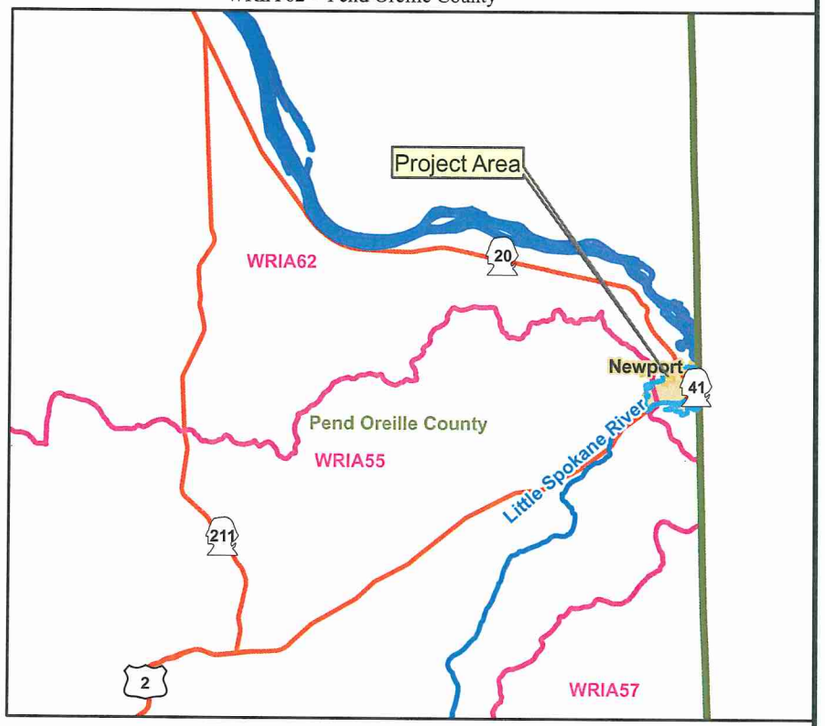
Report by: _____ 6/17/2009
Gene Drury
Water Resources Program
Date

If you need this publication in an alternate format, please call Water Resources Program at 360 407-6600. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Y/Final docs/ROEs/Drury 2009/G3-22797 Newport

City of Newport
Permit Number G3-22797C@1
Sec. 13 & 24, T 31N, R 45E.W.M.
Sec. 18 & 19 , T 31N, R 46E.W.M.
WRIA 62 - Pend Oreille County





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Miles

Legend

- County
- WRIA
- cities
- Local Roads
- Highways
- Townships
- Sections
- Authorized Points of Withdrawal
- Authorized Place of Use

Comments:
Place of use, points of withdrawal/diversions are as defined on the cover sheet under the heading, 'LEGAL DESCRIPTION OF PROPERTY ON WHICH WATER IS TO BE USED.'

Attachment 1