

January 30, 2026

Suncadia response letter to the Development Agreement Extension public comment regarding water rights

We respectfully submit this response to comments about the water rights authorized for use for the MPR. Based on extensive water right planning for the MPR in coordination with the Washington State Department of Ecology and Department of Health, there are sufficient water rights for the permitted number of units.

The Washington State Department of Ecology has authorized the use of up to 3,059 acre-feet annually for municipal water supply purposes for the MPR. There are seven Water Rights authorized for use on the MPR, more particularly described below.

The Water Rights authorized for the MPR identify the total annual quantity and the annual consumptive use of water. The total annual quantity is the maximum volume of water (in acre-feet per year) that can be used under the water right. This is the amount of water conveyed to the MPR for use. The annual consumptive quantity is the amount of water consumed within the place of use and not returned based on groundwater flow or wastewater. The annual consumptive quantity is a subset of the total annual quantity.

The Water Rights authorized for the MPR are as follows:

Water Right	Annual Quantity (annually)	Consumptive Quantity (annually)
S4-85226-J	536.3 AF April 1 to October 15	192.49 AF-CU
S4-83611-J	892.17 AF April 1 to October 15	165.93 AF-CU
	37.45 AF October 16 to March 31	
S4-84112-J	355.98 AF April 1 to October 15	392.29 AF-CU
	650 AF October 16 to March 31	
S4-35803/G4-35804	587.1 AF April 1 to October 15	410.98 AF-CU
G4-36089/S4-36088		103.3 AF-CU
Totals	3,059 AF	1,264.99 AF

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The Departments of Ecology and Health have undertaken review of the Water Rights and water demands. In approving the Water Rights for use on the MPR, the Washington Department of Ecology reviewed modeling for water demands for the MPR that were developed and reviewed as part of the environmental impact statement process. The Department of Health has also evaluated the Water Rights when determining whether there is sufficient water available for use.

Recently the County received comments about water rights for the MPR as part of its consideration of the Development Agreement amendment. We respectfully submit that the commentators mistakenly considered only part of the consumptive use available under the Water Rights. The average daily water use based on meter readings is the total annual volume not the consumptive quantity. As noted above, the total volume of water available to the MPR is 3,059 acre-feet annually, not 1,161.71 acre-feet.¹

There are sufficient water rights to meet the needs of the MPR. In addition, we will continue to demonstrate that water is available through each plat application and in accordance with state law.

¹ The commentators focused only on the consumptive use quantity and likely did not also include the Water Rights G4-36089/S4-36088.