Spokane Aquifer Joint Board
Local Water Utilities United for Safe Drinking Water
1521 N. Argonne Rd. Suite C PMB 250
Spokane Valley, WA 99212
sajbinfo@gmail.com

DATE 2026

(INSERT MAYOR/CHAIR NAME HERE)

Delivered via email to:

RE: Data Center Development and Protection of the Spokane Valley–Rathdrum Prairie Aquifer

The Spokane Aquifer Joint Board (SAJB) s~~trongly suggests local governments to establish rigorous water-resource requirements and letting the actual characteristics of the project determine whether those requirements can be met prior to approving a data-center or other major industrial water user over~~ urges local governments, before approving data centers or other major water users over the Spokane Valley–Rathdrum Prairie (SVRP) Aquifer~~.~~, to require a project-specific and cumulative water-resource evaluation, early consultation with the serving water purveyor, and evidence that drinking water quantity and quality will be protected. SAJB suggests that projects unable to satisfy these requirements should not be approved in their proposed form.

The reason is straightforward: the SVRP Aquifer is the region's sole source of municipal drinking water and an exceptionally sensitive groundwater system. The aquifer covers approximately 370 square miles, and SAJB's 21 member agencies collectively operate 152 wells in 103 wellfields drawing from it. The aquifer was designated a Sole Source Aquifer by the U.S. Environmental Protection Agency in 1978.

SAJB's recently completed groundwater modeling makes the need for caution even clearer.

The 2025 MODFLOW Study updated groundwater capture zones for SAJB member wells using a three-dimensional regional groundwater-flow model. The study delineates 1-, 5-, and 10-year groundwater capture zones and provides updated information for protecting our drinking-water wells.

More importantly, SAJB's companion 2025 Climate Impact Analysis evaluated how future climate and hydrologic changes could affect groundwater levels at member wells through 2070–2099. The

analysis projects substantial reductions in Spokane River flows during the late spring, summer, and early fall. Under the RCP 8.5 scenarios, average June, July, and August flows at Post Falls are projected to decline approximately 85%, 77%, and 76%, respectively, compared with historical averages.

The climate analysis also projects that groundwater levels will generally decline during late spring and summer, with the greatest changes occurring during May and June as earlier snowmelt and changing precipitation patterns alter recharge to the aquifer.

This matters when considering cumulative demand combined with climate-related water stress at the same time.

Data-center cooling systems vary considerably, but water consumption can be substantial. The U.S. Department of Energy identifies cooling towers and evaporative cooling as significant sources of on-site water consumption. The Lawrence Berkeley National Laboratory's 2024 United States Data Center Energy Usage Report estimated that U.S. data centers consumed approximately 66 billion liters of water directly in 2023 and projected that hyperscale facilities alone could consume 60–124 billion liters annually by 2028.

SAJB recognizes that newer cooling technologies can reduce or eliminate some direct water consumption. ~~However, the SVRP Aquifer is the region's sole source of municipal drinking water and an exceptionally sensitive groundwater system.~~Closed-loop, evaporative, air-cooled, and hybrid cooling systems have different water requirements and should be evaluated based on the actual technology proposed, rather than treating all cooling systems as having interchangeable water demands.

SAJB's 2025 climate analysis itself notes that its modeling did not account for increased future pumping from most municipal water suppliers and cautions that additional future pumping of groundwater could further lower levels and considerably warm our existing resource.

This is precisely why SAJB believes a project should be evaluated in direct coordination with the water purveyors and purveyors capture zones expected to serve the facility, and that coordination should occur as early as possible.

Local governments should consult with the serving water utility early in the development process. While cities and counties retain land-use authority, water purveyors are responsible for evaluating their avility to provide water service, including available supply, infrastructure capacity, and applicable water rights. SAJB’s regional groundwater expertise should complement these evaluations by helping assess groundwater protection, capture-zone considerations, and cumulative impacts by the aquifer. Appropriate regulatory agencies should also be involved in evaluating the applicable regulatory requirements.

At a minimum, developers proposing data center or other major water dependent development over the SVRP Aquifer should be required to provide clear, project- specific information addressing the following: ~~the project should clearly establish:~~

- Anticipated average, peak, and full-buildout water demands, including projected future demand as the facility expands.
- Proposed water sources and cooling technologies, including actual consumptive water use, evaporation, and anticipated water losses associated with the proposed system.
- Wastewater handling, including anticipated discharge volumes, treatment, chemical management, and the ultimate destination of wastewater or other discharge streams.
- Measures to prevent contamination and protect groundwater quality throughout construction and operation.
- Whether reclaimed water or other nonpotable water sources are available, technically and legally feasible, and appropriate for the proposed project.
- Water-use plans and operational contingencies during drought conditions, water shortages, and emergencies.
- The extent to which the project may affect existing water supplies, infrastructure capacity, groundwater levels, and other current or anticipated demands within the aquifer.
- ~~Maximum water demand at full buildout;~~
- ~~Recognize the aquifer's Sole Source Aquifer designation and exceptional sensitivity;~~
- ~~Consider projected climate impacts and future water availability when evaluating new large-scale water users;~~
- ~~Consult with the water purveyor expected to serve any proposed large water user early in the planning process; and~~
- ~~Whether potable drinking water would be used for cooling and, if so, why reclaimed water could not be used;~~
- ~~Whether water would be discharged, reused, or returned to the aquifer;~~
- ~~The composition and destination of cooling system of drinking water or wastewater~~

The serving water purveyor, SAJB, and appropriate regulatory agencies should be involved in evaluating these project-specific requirements, including system capacity, groundwater protection, cumulative impacts, and applicable regulatory requirements.

Developers should be required to demonstrate whether reclaimed or other nonpotable water sources are a feasible and appropriate alternative to potable drinking water for cooling. This evaluation should consider the availability of those sources, technical requirements, legal considerations, and the actual water demands associated with the proposed cooling technology.~~Clear evidence that drinking water quantity and quality will be protected~~

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The SVRP Aquifer is an irreplaceable drinking-water resource. SAJB believes that protecting its long-term quantity and quality must take precedence over introducing new industrial water demands whose scale and future impacts remain uncertain.

We encourage local governments to protect the aquifer now, rather than attempting to mitigate impacts after development has occurred.

Submitted respectfully,
The Spokane Aquifer Joint Board

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Jeremy Jenkins, M.S.
President, Spokane Aquifer Joint Board
On Behalf of the Spokane Aquifer Joint Board
Liberty Lake Sewer and Water District

SAJB Members:
Carnhope Irrigation District No. 7, City of Millwood, City of Spokane Water Department, Consolidated Irrigation District No. 19, East Spokane Water District No. 1, Honeywell Electronic Materials, Hutchinson Irrigation No. 16, Irvin Water District No. 6, Liberty Lake Sewer and Water District No. 1, Moab Irrigation District No. 20, Model Irrigation District No. 18, Modern Electric Water Company, North Spokane Irrigation District No. 8, Orchard Avenue Irrigation District, Pasadena Park Irrigation District No. 17, Spokane Business and Industrial Park, Spokane County Water District No. 3, Trentwood Irrigation District No. 3, Vera Water and Power, Whitworth Water District No. 2.

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Ecc:
Planning Commission Members
City Council and/or other Board of County Commissioners
Planning Staff
Spokesman Review

Copy mailed to:
City Hall or Board of County Commissioners Office

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