Blue= Stakeholder comment or suggestion

Other Compiled Written Stakeholder Comments Received Following the November 2016 Stakeholder Meeting

DRAFT Basin-Wide Plan Table of Contents

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Aquifer/sustainability/targeting water use Comments

In our perspective, the objectives and actions are not addressing the problem of how to use less water in this basin to sustain the aquifer. Our only solution appears to be to bring in water from somewhere else instead of reducing our consumption. Where do we state, "Sustain the water supply based on today's level." Therefore, we cannot use more than we have. The Compact is not the only issue--sustainability is the main problem.

While I have no specific objection to green topic language, it clearly focuses on importing water rather than the underlying causation IE depletion of aquifer/sustainability. Augmentation either through transfers or groundwater pumping to temporarily increase stream flow is not sustainable and only serves to further exacerbate the issues the basin is facing from the overuse of our groundwater supply.
Much like the use of a tourniquet on a gushing wound will eventually create more problems.
Sustainability of the Aquifer must be priority one. Any plan that does not address that goal is destined to fail.

A volume of water needed for NE surface water irrigation should be known and a plan to make it available should be stated in a basin wide plan, just as a plan for Kansas surface water is stated in the compact. LB 1098 leaves little doubt that sustaining a balance between water uses and water supplies is the purpose of the legislation. I would suggest we ask the Republican irrigation districts to come up with a draft plan.

Include an assessment of the stream flow of the tributaries to the Republican River to determine the flow trends.

Monitoring/data Comments

A significant monitoring system for groundwater elevation should be installed. I believe TBNRD has installed one in each township now. A rough cost would be in the $2000-3000 range per observation well.

Geographic area Comments

The plan map should include the entire basin in Nebraska, divided by sub-basins that match the Compact Compliance Accounting map. Perhaps the compromise is to have one set of rules inside the 10/50 line and another set outside the line with the ability to make changes or regulate as necessary in either area. The ability to only make suggestions outside the 10/50 line with no funding mechanism is not enough. Please consider;

- The sub-basin management brings problem areas into focus where political boundaries do not. The RR model should be able to determine target groundwater levels that provide sustainability throughout the basin or at least provide an adjustable starting level. Good management will not reduce allocations further in areas where ground-water levels are consistently rising and I see some of them are. Conversely, areas where wells collectively pump a volume that on average exceeds recharge are not sustainable. For example, NCORPE can help URNRD wells meet compliance with the compact but cannot help them recharge their upstream area of the aquifer. This area is on the leeward side of the Rocky Mountains and the water supply is not there to meet current demand. Unfortunately, we cannot negotiate geography. Producers are asking for

certainty and sustainability; they want and need goals to reach and groundwater elevation numbers will let them know what they are up against and how far they have to go. They are good problem solvers when given the facts. Is it a matter of turning end guns off or does money need to be set aside to buy irrigation rights from willing sellers or something else? Wells do go dry, but long before that time, the aquifer material can compact as the draining occurs so that the water holding capacity is lost for all time.

- The Frenchman, North Fork, Arikaree, South Fork and minor portions of Beaver and Buffalo Creeks cross the CO-NE state line. At some point Nebraska should try to work at the sub-basin level with CO, and in other sub-basins with KS to jointly resolve any severe aquifer declines in those sub-basins. CO will help NE wells dry up faster than our producers can do it on their own.
- According to DNR well database, some of the wells outside the 10/50 line have been in for 50 years or soon will be. Excluding those wells from a long-term basin plan may be the political preference in the short term but is poor water management and poor policy for the long term.

Plan Format/Organization Comments

From LB1098

- Determine the means to sustain a balance between water uses and water supplies so that the economic viability, social and environmental health , safety, and welfare of the river basin, subbasin, or reach can be achieved and maintained for the near term and the long term.
    - **We should separate objectives into near and long term categories.**
- Determine methodologies information, data and science to be used to evaluate effect of existing uses of hydrologically connected water on existing surface and groundwater users.
    (a) Processes
    (b) Testing validity of plan conclusions, information and assumptions
    - **This needs to be added somewhere**

There must be goals set and consequences for not meeting those goals. I believe that is expected of this plan and the individual IMPs.