

Ann Diers

From: Rod Horn [rlhorn@hamilton.net]
Sent: Sunday, August 07, 2005 8:30 PM
To: Roger Patterson; Ron Bishop; John Turnbull
Cc: Ann S. Bleed; Keith Rexroth; Ann Diers; Tina Kurtz; Jim Cannia
Subject: WPTF Municipal Subcommittee

Hello,

The WPTF Municipal Subcommittee ("Subcommittee") is scheduled to meet August 11. Based on information provided at their July 14 meeting in York, Nebraska, several comments are warranted:

1. I hope that any proposal(s), if any, submitted for recommendation by the "Subcommittee" maintain permissive (legislative) language, so NRDs working with their advisory groups and the state have the flexibility to determine what is best for their District to develop appropriate, fair and reasonable rules and regulations to manage the ground water resource. Our IMP Work Group has stated many times that one size should not fit all. This should also apply to this important issue as well.

2. Distributed at the July 14 "Subcommittee" meeting held at the UBBNRD's facility was a paper, titled Municipal Water Solutions. The paper notes two approaches to the water concerns of municipal suppliers. The second approach, listed as *II. Acreage Allocation within an area that has been designated as fully or overappropriated*, would apply to our District. This proposal appears to be more of an exemption for municipalities than a minimum allocation (baseline), which on the surface should be cause for alarm to existing water users.

Using the City of Sidney as an example; the city consists of about 3,886 acres (not including the certified irrigated acres within the city boundaries) and a population base of about 6,300 (this does not include the transient population that pulls off I-80, etc.).

In 2004, the City of Sidney pumped about 751,447,000 gallons, which computes to about 327 gallons per capita. Under the 13 ac-in. component of the proposal, the calculations would be about 1,371,765,772 gallons per year, or about 597 gallons per capita. Likewise, their ground water transfer permit, which has not yet been approved by NDNR, applies for 1,116,993,750 annual gallons, or about 486 gallons per capita.

3. At the July 14 meeting, the UBBNRD Municipality Allocation Rules was discussed. This concept seems to be fair, reasonable and well thought out as it has evolved over the years. The examples that were used provided for a better understand of their allocation system.

4. As you are aware, Water Banking was discussed at the meeting, and apparently has been discussed at previous meetings. It is possible that our entire District will remain in a moratorium following the adoption of an IMP. Our IMP Work Group and IMP Subcommittee have been discussing this concept, so it was encouraging to note that the "Subcommittee" was also discussing water banking.

Through this concept or some combination of water banking and allocations, if preferred, would provide protection for municipalities and other existing water users. The water banking process, incorporated into a integrated management plan, would provide for a number of important issues that would involve establishing a fair and reasonable baseline for the existing water users (municipalities, Agriculture, industry, etc.), and for providing the availability of offsets for new and expanded uses.

I hope these comments are helpful as you discuss and consider the alternative solutions on the WPTF Municipal Subcommittee. I would be happy to provide maps and other information if needed.

Rod L. Horn

8/8/2005

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