

My name is Kenneth Frasier and I live in Subdistrict One, Dundy County, four miles north of Max.

The URNRD has presented a draft of an "integrated management plan." What does the word "integrated" mean?

The word "Integrate" is variously defined as:

- To bring together or incorporate parts into a whole.
- To make up, combine or complete to produce a whole or larger unit.
- To unite or combine

The word "Integrated" is defined as:

- Having on a basis of equal membership.
- Combining or coordinating separate elements so as to provide a harmonious, interrelated whole.

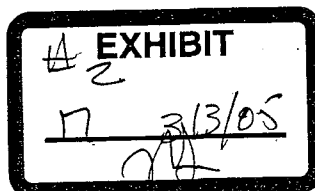
The question at hand is does the draft plan as it exists now, conform to either definition regarding the management of water resources in the Upper Republican Natural Resources District.

The draft deals with compliance issues related to the Republican River lawsuit settlement which is a water quantity issue. But it is not the only water quantity issue faced by the URNRD. Continued depletion of the aquifer is another issue. Related to that issue but not addressed in the document are the issues of:

1. maintenance of domestic water supplies, both individual and municipal,
2. maintenance of livestock water supplies,
3. prevention of further loss of stream flow volumes and continued migration of their headwaters downstream and
4. maintenance of industrial water supplies.

An "integrated management plan" would have to consider all of these things to be considered a minimum integrated management plan for water quantity issues.

A true integrated management plan also would address water quality issues as water quality and water quantity are connected and interactive issues. Increasingly issues of raw water quality from both ground and surface water sources for domestic water supplies and livestock water supplies will be important issues. NPDES permits for sewage and other discharge will be impacted as surface water flows are further reduced as a result of groundwater pumping. Other factors not considered in the URNRD draft include the impacts of reduced surface water flows on the status of surface water quality standards and Total Maximum Daily Load standards. Reduced surface water flows also may contribute to species in surface waters becoming species of concern, the precursor status to possible listing as rare, threatened or endangered species.



The draft document does not provide documentation of following an integrated management planning process or a minimal planning process at all. The minimum integrated management planning process should include:

1. **Defining and assessment of a management area.** There is no assessment included in this document. Assessment should identify the minimum potential stakeholders or users and the current condition of the resources relative to all users. The plan's purpose is to take the District from where it is now to where it needs to be. Neither is clearly identified in this document.
2. **Engaging affected interest.** There is no documentation of who has been involved in development of this plan beyond the NRD and NDNR. There is no documentation of efforts to engage anyone other than the NRD Board and selected NDNR staff. No identification of the stakeholders or description of efforts or success in involving them in development of the document is offered.
3. **The management alternatives considered are not identified.** Only the one selected By the narrowest of water interests directly engaged in the development of the document is offered. This thwarts the planning process and the necessary broad public and institutional input required for development of a plan truly representative of the local wishes and needs.
4. **Endorsement by decision-making authorities.** There are no endorsements by any identified agency inclusive of the NRD or NDNR themselves even included in the draft. Neither is there any indication the draft has been reviewed by any other state agency including DEQ, as related to potential water quality issues, or the Attorney General's office, or other potentially affected NRDs in the Basin.
5. **Implementing the plan.** Implementation statements are broad and non specific especially for water short years. Contingency Plans for management of Water Short Years are clearly called for under the RRCA Settlement yet nothing is offered here by the NRD beyond a brief broad statement. While the primary responsibility for the Contingency Plans does rest with the State, the role of the URNRD, should be more clearly developed, evaluated and described. A Contingency Plan only works if it is in place before, not after, the need develops.
6. **Monitoring and evaluation.** There means for monitoring and evaluation are not clearly identified or stated.

March 3, 2005

The Upper Republican NRD Board,


My name is Robert Grams and I live and farm south of Imperial, NE, and have all my life. I have watched Imperial and Chase/Dundy Counties "boom" since the 1960's because of irrigation. This was because of the foresight of my father and, I would suppose, many of your fathers. Most all of the prosperity and bounty of SW Nebr is due to the advance of irrigation and center pivots. Please don't let the control of this precious resource (water) fall into the hands of the State and politicians.

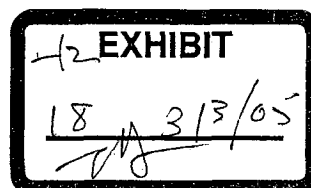
I would like to make several points:

1. Don't give the State of Nebr a "blank check" - so to speak. It's my belief (and history will bear this out) that once Government lures you into giving them your rights, you will never get them back. The IMP that you are proposing now will be cut further and further by the higher powers once you sign on the dotted line. This has always been true of government. Once politicians become involved, you know who will control us--Lincoln and Omaha, with their urban Senators. I thank you for fighting to preserve carryforward and pooling, but I fear that once the IMP is adopted these will fall by the wayside. Please listen to the people of SW Nebr and not be lured down a different path by the DNR.
2. I believe that the URNRD is assuming too much of the burden to fix the Kansas-Nebraska problem. The Upper has been controlled with water meters for many years--which has resulted in conservation of water, but all the surrounding areas have not. So, why should we continue to sacrifice more and more?
3. I want you to take a more active role in looking at alternatives to this water issue. Water transfer is one very good possibility. I think this idea has a lot of merit and should be pursued and stated as part of the IMP that you adopt. Nebraska is water rich--it just has to be moved around. If we don't keep and use the water, Denver and Omaha will end up with it!! This state is built on agriculture, so keep the water here.
4. SLOW DOWN! Slow this process down so the ultimate plan is what we want. I'm sure the State is promoting urgency (fear) so they can get what they want before we can think it through. We do have time.
5. My last thought is that farmers (irrigators) are not crooks or being wasteful of a natural resource (water). They are the most conservation-minded people I know. The land, livestock, and wildlife is our living and our son's and grandson's living. Why would we deliberately destroy it? If you want to see wastefulness--let the control of this resource get into the hands of government and politicians. I urge you again, to listen to the people and keep local control.

Thank you for listening to me. I really appreciate your willingness to solve this problem.

Sincerely,


Robert Grams
Imperial, NE



STEVEN GRAMS

To: URNRD Board

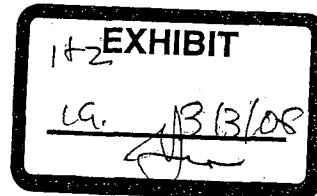
Subject: IMP

Please consider the following before approving a new IMP with less allocation & commitments that the Upper Republican will carry so much of the load if compact is not met.

1. We have always had an IMP when no one else has. Our allocation has decreased steadily over the last 15 yrs and stream flow has only gotten worse. The Middle & the Lower Republican have NEVER had any control in areas that contain far more quick response areas than the Upper. We suggest that our IMP not reduce allocation or commit us liable for any percentage of water until the Middle & Lower Republicans are proven to be in control.
2. Denver & Omaha both know the wealth of water in the Panhandle and in Central Nebraska. Just as the Upper Republican Farmers pioneered irrigation in the past, we should pioneer canals of water now. Instead of being submissive, be Pro-Active. Take a stand and say the cost is too high for our communities to give up anymore allocation. Suggest positive new ideas to solve problems and possibly create even more opportunity for our communities. Canal management and increased water in recreation areas equals more jobs & more economic activity in our hometowns. If we don't put first claim to the canal concept we will never make the food chain compared to the big cities speculating the water transfer concept for their own use.
3. Medicine in Agriculture. The control that we have with irrigation compared to those that depend on rainfall is priceless. As genetics are being produced in grains to be placed in medications, the control of incorporation & timing of application may prove to be superior to those who depend on rainfall. We have to protect the abundance of water for our communities to grow when new purposes for production exist. Don't draft a plan that slowly takes us out of the game. Make a plan that not only keeps us in the game, but makes us a winner.
4. If you consider the rainfall in Iowa & Illinois as a gift from God for their areas, consider ground water as God's gift to us for our areas. All areas have something and people capitalize from it. If you don't implement an aggressive stand to persuade the state to aid us in building canals now, someone else is going to get the water. This very situation may have came about to serve as our opportunity to build canals before large cities take it all. Nebraska has an obligation to Kansas. We can meet that obligation by destroying what everyone ever worked for in the Upper Republican OR we can poise solutions to meet our obligations to Kansas & possibly drastically improve the future off our communities in doing so. Notice I said "what we have worked for in the Upper Republican". REMEMBER that until now we are the ONLY ones that have been stewards & workers of water.

To be an agricultural power we must have water. If you commit all of us prematurely to a situation that doesn't sustain the current economics of our community, we may never get back what we've lost. There is lot of water under us and there is a lot in the Panhandle of Nebraska. Please vote no to the current IMP & join Water Claim now and become Pro-Active.

Steven Grams



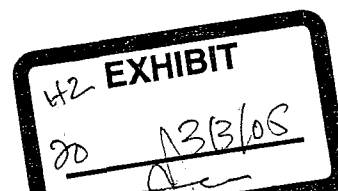
PO Box 247
Imperial, NE 69033

PHONE 1-308-882-4671
FAX 1-308-882-5848
E-MAIL Goose@chase3000.com
WEB SITE

I Terry Bilka have come before the Upper republican NRD Board on this the 3rd day of February 2005 to give testimony. I am a life long resident to Chase Co and don't want to be seen as someone who is against water conservation, I am of the opinion that water conservation and irrigation go hand in hand to be effective and profitable as a farmer in South west Nebraska. I don't however think that the three counties in The Upper republican NRD can save the aquifer. And it appears that others in the voting public of this water district must feel the same, or they wouldn't have voted to start removing members who don't look out for their constituents interest.

It appears to me that dealing with the Nebraska DNR is like dealing with a bad drug habit. The more you give it the more it wants! And it is back at our door again. They want our water district to be responsible for most of the water conservation needed to bring Nebraska into compliance with the recent water compact agreement. When did Southwest Nebraska become the whole state of Nebraska? Why is it that the Irrigator in South West Nebraska always ^{has to} be the one who is called on to make a sacrifice? Have you thought about why the Water districts were ever established? My theory is that the DNR wanted a way to govern water in out state Nebraska with out affecting the more populated areas of the eastern part of the state. And it has worked very efficiently. Use a scare tactic every time the DNR wants something done, go the local NRD board and get local board members, good outstanding citizens, to do the dirty work for DNR. This way it looks like the local board is making the changes and not the DNR. Dealing with the DNR is like dealing with a bad Drug Habit.

It is my understanding that to make this IMP work we will need approximately 50,000 acres to be removed from the pumping field and enrolled in a assistance program like CREP. What are the benefits, rules, and conditions of these assistance programs?



I went to the NRCS and the FSA to get information on these programs but all they can give is a generality of cost or rules to comply. Why would you want to approve a new IMP without knowing if this 50,000 acres is a realistic and viable number? Dealing with the DNR is like dealing with a bad Drug Habit.

It has been suggested that the money that will be used to fund these assistance programs be partially collected from a tax on irrigated acres. Why cant the funding come from a tax of every bathroom in the State of Nebraska? They use water also. Why is it we are Nebraskan's in everything except water. We in southwest Nebraska didn't sign these water compacts. The state of Nebraska as a whole did it. There are other ways to consider, not just reducing Irrigation. The search for a solution shouldn't stop here. The term Integrated Management Plan means 'To merge gradually one with another through a continuous series of forms in a judicious use of means to accomplish an end'. The proposed plan uses only Irrigation cuts, no different forms or means are suggested. Every time I attend a meeting of the URNRD and most of the time when I discuss water issues with a board member I leave with a felling that I have just visited with a water rival. The feeling is that I don't have enough information or shouldn't be asking these questions or offering my opinion. I think the board as a whole is intimidated by the NDNR who uses scare tactics as a means of governing.

I know that every board member who would vote for this IMP thinks in his heart that it is the correct thing to do. However I appeal to each of you as an individual to pledge to continue to seek a more rounded solution to this problem other ^{than} ~~that~~ more allocations cuts and agreements that will only restrict water use in the future.