

July 2, 2004

RECEIVED
JUL 6 2004
DEPARTMENT OF
NATURAL RESOURCES

Ms. Tina M. Kurtz, Water Resources Program Specialist
Department of Natural Resources
P.O. Box 94676
Lincoln, NE 68509-4676

Dear Tina:

At your request proposed changes to the Ground Water Management Plan submitted by the Tri-Basin Natural Resources District (NRD) were reviewed. Yesterday, I also attended a meeting of State agency officials at which the plan was discussed. The remarks which follow stem from those activities.

1. In several instances it was noted the NRD Board's plans and its rules and regulations may not be in harmony. Given the correct set of assumptions, implementation of the proposed Phase II language may never achieve the objective of maintaining the "1983 baseline" depicted on Graph #19. Realizing the perpetual objective envisioned in the Board's Reservoir Life Goal (p. 12) seems equally problematic. In discussions with NRD representatives we suggest such inconsistencies be mentioned.
2. The materials submitted by the NRD correctly indicate substantial portions of recharge to the underlying ground water reservoir comes from importation of surface water by the Central Nebraska Public Power & Irrigation District. Beginning with irrigation deliveries in the 1940s, estimates indicate recharge has resulted in accumulation of more than six million acre feet. Maps and other materials accompanying the NRD submission document the extent of recharge and call attention to its official recognition. As long as the Central District continues importing surface water, recharge will presumably continue.

But, 2004 marks the fourth year of substantial drought. As an hydrological consequence recent news stories quoting Central District officials indicate supplies impounded in Lake McConaughy will be nearly exhausted by autumn. At least in the near future, we believe the Central District's importation of water into the Tri-Basin NRD can not be assumed.

With the great dependance on recharge from Central District operations and the prospect of significant reductions in the near future, NRD Board members will need more information to

Tina M. Kurtz
Page 2

achieve their Reservoir Life Goal and to generally fulfill their ground water management responsibilities. Central District staff members have the additional information. Therefore, we believe the Board's Management Plan should state its intention to pursue transfer of that knowledge to its own staff members. When discussing the proposed plan with representatives of the NRD, we urge inclusion of that recommendation.

For the Division,

A handwritten signature in black ink, appearing to read "J. Michael Jess", written over the text "For the Division,".

J. Michael Jess, P.E.
Senior Lecturer