Testimony before the MRNRD by your Concerned Friends and Neighbors

The Middle Republican Natural Resources District is proposing a set of regulations that will have a negative effect on irrigators within the district. These proposed rules do not meet the quantitative needs of irrigators, lack sufficient long range management tools, nor do they accomplish any conservation goals.

According to Rule 5-3.7, entitled IRRIGATION USES, the MRNRD will give a base allocation of 13 inches per year for 100% of certified irrigated acres for 3 years. Farmers may use or "bank" whatever amount of water they want to as long as they do not exceed 39 inches at the end of the allocation period. However, the district can determine a "water-short year" when the area experiences a dry year. As a result of a "water-short year, the board has the right to cut the allocation of 13" to only 90% of certified acres or as determined by the board. The proposed rules also have land divided into two classes, Upland Sub-Area and Quick Response Sub- Area. These two land classes can be treated differently when distributing a water allocation during a water-short year. During a water short year, irrigators are limited to 13 inches of water use on each certified acre. This limits the amount of water that irrigators can withdrawal from the "bank".

These proposed rules do not give irrigators the flexibility to conserve water during normal years and to "bank" the water for drier years. As a result, irrigators can not efficiently plan crop rotations. Thus, they are not encouraged to conserve water. This plan only magnifies the effects of drought by inhibiting the irrigators' ability to implement a management strategy through long term crop rotations.

This proposal does not give irrigators the resources to be able to effectively operate their business on a long term basis. The undersigned people affixed to this testimony ask that the board vote AGAINST these rules and come up with a plan that better addresses long term irrigation planning. We need a "water banking system" that meets our quantitative needs and one that empowers long term management options.

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