

**Oral Statement**

**Aaron Thompson, Area Manager  
Nebraska-Kansas Area Office**

**Regarding Proposed Integrated Management Plan for the  
Lower Republican Natural Resources District**

**January 13, 2011**

Good afternoon, my name is Robert Schieffer. I am the acting manager of the Bureau of Reclamation's McCook Field Office. I am here on behalf of Mr. Aaron Thompson, Area Manager of the Bureau of Reclamation's Nebraska-Kansas Area Office located in Grand Island, Nebraska.

For the record, I am presenting written and oral statements here today. I have given a copy of the written statement to the hearing recorder.

The U. S. Bureau of Reclamation (Reclamation) recognizes the appropriate role of the State of Nebraska to establish and enforce water policy. While the current State water policy of developing and implementing Integrated Management Plans (IMPs) are a step in the right direction, Reclamation contends that the evolution of State water law that has evolved following approval of the Compact does not adequately address the physical reality of the hydrological connection between surface and groundwater sources. The

legal separation between surface and ground water has lead to an overdevelopment of the finite water resource in the Republican River Basin. As a result, the investment of the citizens of the United States in the development of infrastructure is in jeopardy.

Reclamation appreciates the Lower Republican Natural Resources District's (LRNRD) acknowledgment that the rights and interest of the United States and specifically Reclamation waters within the Lower Republican Natural Resource District are recognized and respected by your IMP. Reclamation is encouraged by, and supports your efforts to reduce ground water pumping within your district beyond what was required in your 2008 IMP.

Reclamation is also encouraged by your efforts to eliminate the practice of carrying forward unused allocations and developing an IMP based on concepts and goals of maintaining a long-term sustainable river basin to achieve compliance with the Compact. Adequately reducing ground water depletions will gradually allow the stream flows to recover, provide equity among water users, and assist Nebraska in achieving long term Compact compliance.

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Reclamation testified at the Republican River Compact Arbitration hearings in April 2009 outlining our concerns that without additional limits and

controls on ground water use, the surface water supplies in the Basin will continue to decline making it more difficult for Nebraska to meet Compact compliance in the long term. Reclamation concurs with Arbitrator Dreher's decision that "...Nebraska's current IMPs are inadequate to ensure compliance with the Compact during prolonged dry years" and "Nebraska and the NRDs should make further reductions in consumptive ground water withdrawals beyond what's required in the current IMPs." It is our position that ground water consumptive use must be reduced to a level that will allow base flows to recover to an extent that will allow Nebraska to consistently comply with the Compact in both the near term and long term. This is the only way Nebraska can meet the purpose of this IMP of "sustaining a balance between water uses and water supplies . . ."

To ensure compliance in the long term, Reclamation believes there must be a healthy surface water component in the Basin. Reclamation is concerned about the continuing depletion of inflows to the Federal reservoirs. Federal projects were constructed based on the concept that project surface water rights would be protected. The trend of increasing ground water depletions and declining ground water levels in the basin ensures continuing stream flow depletions. Reducing ground water allocations beyond the requirements of your 2008 IMP is an important first step in controlling groundwater

depletions. It is still unclear that these further reductions will be sufficient to ensure Compact compliance during all years. Our experience leads us to believe that groundwater depletions will have to be continually evaluated in order to have sustained and long-term Compact compliance.

In conclusion, Reclamation is encouraged by the effort of the Lower Republican Natural Resource District to consult with us in the development of the proposed IMP and we are willing to continue to work collaboratively with all the NRDs, Irrigation Districts, and State as they seek compliance with the Compact.

Thank you for the opportunity to present this testimony.