

COMMENTS SUBMITTED VIA EMAIL 10/13/2021 BY MARK RUDE, EXECUTIVE DIRECTOR, SOUTHWEST KANSAS GROUNDWATER MANAGEMENT DISTRICT NO. 3

We want to thank the Water Office staff and Water Authority for all the work that has gone into the draft revision of the State Water Plan. We have identified several additional comments from the early set provided from the GMD3 board and staff as follows:

Page 5; Consider adding the bold underlined text – “It is not an overstatement to say that the future of habitability in much of western Kansas is at stake; water users of all kinds will need to adopt practices amendable to less groundwater use or seek alternate sources if these populations and economies are to remain viable.”

Page 13; The agencies ~~receiving~~ typically receiving SWPF payments are the KDHE, the KWO and the Kansas Department of Agriculture’s Division of Water Resources (KDA-DWR) and Division of Conservation (KDADOC). The budget statutory requirement contemplates an annual SWPF budget projected to no fewer than 25 years ahead. Multi-year programs and projects could be more fully funded long term if that requirement would be identified in the plan and fully implemented.

Page 15; “in addition to state laws and policies for water management, other entities...” We suggest something more accurate that does exclude GMD’s as being in state law and policies. A description of some GMDs appear in random RAC sections, yet references are all through the general water plan draft. This seems to be the place to introduce the reader to state groundwater management laws and policies for GMD’s.

Page 20 near top; “... hold at the current rate of decline, ... is an incorrect statement. Consider confirming this with the KGS staff it should read more like “... hold water levels steady for now, ...”

Page 20 at bottom. Consider adding the underlined language; The continued existence of these economic activities, and the communities they support, relies on protecting and ~~preserving~~ restoring the Ogallala Aquifer

Page 24; Consider this text replacement; ~~The best method to keep groundwater available longer is to pump less~~ One way to keep groundwater available longer is reduced use.

Page 28; Funding and resource needs – last bullet – “Water right credit incentives” Water rights are real property rights developed in a statutory process. If this is not defined in that process, having it in the Water Plan without explanation may be confusing or misleading.

Page 28; “... and reduce the removal of water from the state.” May be confused with the prohibiting the exporting of irrigated crops and watered livestock.

Page 83; At the bottom paragraph it reads “GMD3 is a water management entity in the region, overlying ... GMD3, incorporated in 1976, is charged with developing local water policy to conserve the aquifer that is compatible with state laws while promoting voluntary, incentive-based water conservation efforts with available tools and resources.” Consider something more in line with legislative policy, like “charged with the development of local policy for proper management and conservation of groundwater resources to prevent economic deterioration.” If the Plan references the GMD areas and management policies, consider a better description of what GMDs are and their actual charge.

Page 235 at bottom of page; same as above.

Page 240 at the bottom; Measuring success: Are there other measure goals for the first two? The third time seems appropriate for the action steps on that page.

We appreciate the consideration of these comments as you continue your work to finalize the draft revised state water plan.

Mark

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