

COMMENTS RECEIVED VIA EMAIL ON 10/14/2021 BY KENT ASKREN, PUBLIC POLICY DIRECTOR,
KANSAS FARM BUREAU

Director Owen, Chairman Buehler and members of the KWA,

On behalf of the Kansas Farm Bureau, thank you for the opportunity to provide comments on the draft 2021 Kansas Water Plan (KWP). We appreciate your efforts to update the plan, which are vital to the long-term prosperity, livelihood and well-being of our state.

After reviewing the draft plan, we offer the following input for your consideration before the release of the final plan:

Is it time to better clarify/determine goals for the Ogallala? Is “conserve and extend” the right goal? Can the general public pick up this document and clearly identify the goal(s)? If not, that might be something for further discussion amongst the agencies and GMD’s.

Page 13/33, rightly so, there is and has been considerable discussion to fully funding the SGF and EDIF portion of the KWP revenue stream. But we believe the plan should also convey to the audience that the consistent and majority revenue stream has been from primarily municipal and agricultural sectors. Without this knowledge, it may be unclear that combined, MU and Ag contribute yearly in excess of \$11M at roughly a 50/50 split each year (*based on KLRD 2019 briefing book*). The state must live up to their agreement to fund the KWP which is now some \$90M in arrears.

Page 14 and page 21, we appreciate the explanation on the Kansas Water Appropriation Act which is the backbone of Kansas water law. Clarifying for the audience things like water ownership, the priority system and that preferential use does not apply to our law will help establish the basic framework for conversations moving forward.

Page 20...if we missed it we apologize, but this may be a good location for explaining the importance of domestic water use and water rights, which often gets overlooked. Without adequate quantity and quality domestic water supplies, the Kansas landscape changes for the worse.

Pages 23-25...singularly mentions irrigation use reductions. We are concerned that audiences may begin to associate water resource management decisions being based upon who the majority users are rather than the clear intent in the KWAA of dealing with shortages through protection of private property rights based upon the priority system. Subjectively selecting winners and losers is clearly in opposition to the KWAA and sets dangerous precedent. While we applaud the efforts through the exercising of LEMA’s and WCA’s to address conservation, the approach of targeting only irrigation for mandatory (LEMA) cuts with no concern for priority; offering random flexibilities (WCA) that may or may not achieve consistent conservation goals; uncertain evaluation/monitoring to avoid impairments; or how these efforts mesh with GMD management programs; is concerning.

Page 25...Water Tech Farms have helped showcase emerging technologies and give producers an opportunity to see and learn without having to experiment with slim profit margins. Rather than adding more WTF's we would encourage re-locating WTF's to areas that may have been underserved in the past and consider expansion of PACE Farms.

Page 38...we touched on it earlier but want to reinforce that the KWP audience should be fully informed on where the consistent KWP revenue stream has been so that ideas do not sprout to further exploit MU/Ag sectors for additional dollars while the general public SGF and EDIF money gets deferred.

We would also like to suggest that RAC meetings be offered virtually and conducted as infrequently as possible so that we encourage broader participation.

Thank you again for your efforts in updating the KWP and for considering these comments.

Kansas Farm Bureau

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