



September 24th, 2018

The Honorable Ryan Zinke
Secretary of the Department of Interior
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Re: Quivira National Wildlife Refuge Water Impairment Claim

Thank you for taking the time to receive this correspondence and to evaluate the economic implications of the Quivira National Wildlife Refuge's claim of water impairment in South Central Kansas as well as the economic harm that the claim will cause to citizens of the region. We have deep concerns related to the potential negative economic impact of this situation and would like to work with you to find a solution to the Refuge's problems that is the least harmful to the local economy.

In 2013, the US Fish and Wildlife Service which manages the Refuge filed a claim with the State of Kansas's Division of Water Resources stating that the amount of water flowing into the Refuge from the nearby Rattlesnake Creek has been decreased below acceptable levels because of local crop irrigators. Under Kansas water law the US Fish and Wildlife Service's water right is older than the water rights of most local irrigators. The Kansas Division of Water Resources determined that because the US Fish and Wildlife Service had more senior (older) water rights that indeed irrigators with less senior rights were negatively impacting the flow of surface water to the Refuge. There are a few other factors impacting water flow, but irrigators have been identified as the primary issue. The determination found that the surface water flow is below the level it should be according to its water right and that steps needed to be taken to ensure that more water flows into the Refuge. Practically what this means is that area citizens who are irrigating need to change their practices and use less water to ensure the Refuge has the water flow they are demanding.

This fight over water has nothing to do with a declining aquifer (the water table is very stable), but is a fight over surface water rights and surface water flow. The Kansas Division of Water Right's order stated that water flow must increase and the local Ground Water Management District #5 (GMD5) needed to determine how each individual within the impairment region should reduce their water use so that the Refuge would have access to more water. New augmentation wells has been determined to be a solution to the Refuge's lack of surface water issue. However, the debate continues about where those wells should be placed, how much they should cost, and how much each individual must cut their water use in order to install the new wells.

We are very concerned that any reduction which would require local farmers to irrigate less acreage, or provide their crops less water, will have a tremendous negative impact on the local

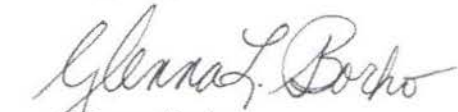
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economy. Irrigated land is the most valuable in the county because of the higher crop yields it produces. This increased yield translated into increased revenue to farmers. Any reduction in irrigation would negatively impact land values and less irrigation means less crop yield which would have significant negative impacts not only on the local farm economy but also on the county valuation level which would impact all government services. Additionally, the same group of citizens which is being forced to use less water, thereby making less money, is also being asked to fund the construction of new water systems and wells to provide new surface water to the Refuge. Pratt County's economy is 70% based upon agriculture. This reduction in water use, loss of land values, and loss of crop yields will harmfully ripple throughout the county's economy.


We believe these negative impacts could be partially mitigated if you would work with mid-level staff at the US Fish and Wildlife service to consider alternative solutions that solve the Refuge's problems in the most economical manner for local citizens. We request that you and trusted leaders on your staff talk with the Kansas Division of Water Resources and express to them that you are open to the most economical solution, which will have the least impact on the local economy. We believe this solution is the drilling of augmentation wells right on the Refuge, rather than somewhere far away which will require long distance piping and be more costly to local citizens. Piping water long distances would also be hugely detrimental to the local economy because of the increased costs of construction that would have to be covered by local citizens. Creating new water wells as close to the Refuge as possible will be the cheapest solution, would not require significant irrigation reductions, and would solve the Refuge's perceived surface water shortage for recreational use. We urge you to accept this solution rather than suggesting water should be piped a long distance at a high price to achieve the same end goal.

Finally, while we understand the Refuge's importance we believe water to produce goods and commerce, which provide jobs for our citizens, is more important than water for recreational uses. Please ensure all levels of your staff understand you and the President's priorities on growing the economy and that their stance is in alignment with yours on this issue. We believe if you would accept the most economical solution to solve the problem that the Kansas Division of Water Resources would likely follow suit and many of these economic consequences could be mitigated. We look forward to answering any questions you may have and working with you to resolve this matter as soon as possible.

Regards,


Glenna Borho
District Two, Chairperson
Pratt County Commission


Joe Reynolds
District Three, Commissioner
Pratt County Commission


Dave Ward
District One, Commissioner
Pratt County Commission