

**November 25, 2020**  
**Kansas Division of Water Resources**  
**Wichita County Local Enhanced Management Area**  
**Groundwater Management District #1**  
**RE: Public Hearing #2**

**The purpose of this second hearing is to determine if the LEMA's corrective controls are sufficient to extend the life of the Ogallala Aquifer. After having established 2, 5-year WCAs on the irrigated land that I farm I believe the 5 Year allocation will result in much better water management versus the "use it or lose it" rules currently used, which encourage inefficient water use.**

**One difficulty of establishing a LEMA is determining the allocation for each water right. This LEMA uses historical use and then an appeal process for those water rights whose owners or users that feel their WHCL Allocations should be reconsidered. During the appeals process the capacity of the well is measured and multiplied by 150 days to determine a yearly allocation. This quantity is then reduced by the conservation factor. After studying the proposed LEMA Allocation table, it appears the 150 days multiple is very high and the corrective controls may not be sufficient to extend the use of the Ogallala Aquifer. A 500 gal well would receive a WHCL Allocations of 224-acre-feet per year. Less than a handful of Wells have a five-year history of pumping more than that. In addition, the five-year plan allows for pumping more water in any year to establish a low water use crop like wheat in order to save water the next year. I used a 500 gallon well because the rule of thumb is that the size of the well is needed to water a 120-acre sprinkler-irrigated circle of corn.**

**In summary this is a very good plan and deserves support because it will extend the aquifer. If this appeals flaw is addressed the plan can easily be used in the rest of GMD1.**

**Ray Smith**  
**Board Member GMD1 since August 2020**  
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