



Nebraska Public Power District

'Always there when you need us'

October 10, 2006

Department of the Army
Corp of Engineers, Northwestern Division
PO Box 2870
Portland OR 97208-2870

Attn: Mary S. Roth

Thank you for the opportunity to comment on the proposed framework of the MRRIC planning group. We have had some discussions with members of the federal working group regarding the framework and have found them to be cooperative and responsive to questions that we have had concerning the document.

The concerns we have with the document is 1) are the membership of the planning group and 2) the role of the working group. As a public power utility, we feel that just two seats for local government are not enough for the broad spectrum of local government issues. A few of the diverse interest groups include municipalities that are concerned with tourism, municipal utilities concerned about water quantity for drinking water intakes, utilities with issues related to river temperature, and utilities concerned with river degradation impacting their intakes. It is unlikely that those separate types of interests would easily fall into a coalition approach recommended in the framework. The framework has already recognized this fact in recommending four seats for agricultural interest due to the varied interests across the basin; ranching, irrigation, levee and drainage districts. As such we recommend that public power seats be added to the planning group.

Also included in the framework membership are two seats for based river-focused community groups. Although we think that these groups can and should be included, due to the steep learning curve on Missouri River issues and the fact that they have not previously specifically participated in any of the previous processes, it may be difficult to find appropriate people to fill two seats. That being said it would be better to include them as potential at-large seats.

The last comment we have concerning the framework membership is that the MRRIC situation assessment recommended approximately 75 seats for MRRIC. Our experience with this type of process indicates that the final MRRIC will look remarkably like the planning group. Why not test the idea that that many seats are workable for this type of group by including approximately that many seats in the planning process?

Our second concern follows to the point in the previous paragraph, we recommend that MRRIC be formed and the planning group idea be scrapped. MRRIC can do the necessary work that would be done by the Planning Committee and then all of the stakeholders could contribute.

Thank you for considering our comments relating to proposed framework. Nebraska Public Power District remains committed the MRRIC process and looks forward to being involved in all parts of the process. Please keep us informed and let us know when applications can be submitted to be part of the planning process.

If you have any questions please call Jeff Shafer at 402-362-7360 or Brian Barels at 402-563-5335.

Sincerely,

Brian Barels
Water Resources Manager

General Office

1414 15th Street / P.O. Box 499 / Columbus, NE 68602-0499

Telephone: (402) 564-8561 / Fax: (402) 563-5551

www.nppd.com