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EPA Docket Center
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Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20406

Re: Docket ID No. EPA-HQ-OW-2018-0149

To Whom It May Concern:

On behalf of the Common Sense Nebraska Coalition, we would like to offer these comments for consideration and support of the U.S. Environmental Protection Agency's (EPA) and the U.S. Army Corps of Engineer's (Corps) ("the Agencies") proposed rule: Revised Definition of "waters of the United States" [84 Fed. Reg. Vol. 4154 (February 14, 2019)] (hereinafter "proposed rule"). This rule is the second step in a two-step process intended to review and revise the definition of "waters of the United States" consistent with the Executive Order signed on February 28, 2017, "Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the 'Waters of the United States' Rule".

Background

Common Sense Nebraska is a Nebraska-based coalition consisting of organizations and entities who came together in 2014 in response to EPA's 2015 "waters of the United States" (WOTUS) Rule; a regulatory proposal that would harm both rural and urban Nebraskans through expansion of EPA's powers and authorities under the federal Clean Water Act. The coalition's purpose is to build awareness and understanding of the EPA proposal and the impacts it would have to Nebraskans.

Nebraska is blessed with abundant water resources both on the surface and in groundwater formations. Water has shaped the development and economy of Nebraska for many generations and it continues to be a focus of statewide importance both in quantity and quality. As a result, Nebraska has passed many laws over the years to protect this resource and to ensure proper stewardship into the future. Although water quantity issues are vital, the focus of this discussion will be water quality. On the water quality front, Nebraska has passed state laws and regulatory programs for both groundwater and surface water quality protection. The main statute is the Nebraska Environmental Protection Act ("NEPA"), Neb.Rev.Stat. §81-1501 et. seq., which was passed in 1972 in response to passage of the federal Clean Water Act ("CWA"). The original NEPA, its amendments, and subsequent state statutes have created a comprehensive water quality protection framework at the state level. Likewise, in 1972, the Nebraska Legislature created the Natural Resource District system of political subdivisions with local authority on both water quantity and quality management. In turn, county and municipal government in Nebraska has acted to manage water issues through ordnances and zoning protection across the state. And, of course, the federal government enacted numerous laws, mainly the CWA, to protect surface water quality from a national perspective. This system of local, state, and federal requirements is

daunting to understand in order to ensure compliance. To be most effective, it is critical that each layer of government clearly define its role in protecting water quality.

For protection of surface water, the federal CWA has been a driving force in establishment of the nation's water quality programs. As envisioned by Congress, the CWA seeks to reach its goals through two main permitting programs in Sections 402 and 404 of the Act. In Nebraska, the Section 402 program is administered by the Nebraska Department of Environmental Quality ("NDEQ") and Section 404 by the Corps of Engineers. A critical question in both permit programs is "when do I need a Permit?". The answer lies in what types of water bodies are "jurisdictional". If jurisdictional, then activity conducted in that water may be regulated by the CWA. And, as the preamble to the proposed rule so effectively lays out, the question of federal CWA jurisdiction has been a long journey of very confusing decisions and outcomes. The proposed rule discussion also describes the intent of Congress to have a role for the federal government in the CWA but also a role for state government as co-implementer. Clearly, Congress recognized a federal interest in the nation's water but also reserved for states the ability to protect locally important water bodies. To the extent these roles can be clarified, there will be improvement in the ability for those that are regulated to clearly understand obligations and responsibilities in being stewards of our precious water resource. For example, extensive current use of the "significant nexus" test (which will be further discussed below) is a case-by-case determination that is inherently subjective and leads to disparate, inconsistent results. Among other things, the proposed rule removes the significant nexus test and adds helpful clarity to reduce needed case-by-case determinations.

Summary of Proposed Rule

On February 14, 2019, the Environmental Protection Agency and the Department of Army ("the Agencies") published for public comment a proposed rule defining the scope of waters federally regulated under the CWA. The proposed rule is intended to "increase CWA program predictability and consistency by increasing clarity as to the scope of 'waters of the United States' federally regulated under the Act". 84 Fed.Reg. 4154. Comments must be received by April 15, 2019.

As stated, "[t]he agencies propose to interpret the term 'waters of the United States' to encompass: Traditional navigable waters, including the territorial seas; tributaries that contribute to perennial or intermittent flow to such waters; certain ditches; certain lakes and ponds; impoundments of otherwise jurisdictional waters; and wetlands adjacent to other jurisdictional waters." 84 FedReg 4155. These six components would form the scope of the WOTUS rule. The proposal also includes a list of excluded waters and definitions of terms used in the rule.

The following comments are specific to the six component areas and also to the other features of the proposal that the Coalition deems significant.

Comments

1. Traditional navigable waters and interstate waters. At the heart of the Proposed Rule's definition of WOTUS is what the Agencies call the traditional navigable waters ("TNWs") or the "(a)(1) waters." The scope of this category is of critical importance because all other categories of WOTUS tie back to it. Unfortunately, the Agencies carry forward prior, overly broad

interpretations of TNW. In the Agencies' view, this category encompasses all waters subject to Rivers and Harbors Act jurisdiction, *plus* waters that court decisions would define to be TNWs, *plus* any other waters that are navigable-in-fact. *See* 84 Fed. Reg. at 4,170.

We strongly urge that the Agencies correct this overreaching interpretation and limit the TNW category to just waters subject to Rivers and Harbors Act jurisdiction. Thus, TNWs should be defined as "waters which are currently used, or which were used in the past, or may be susceptible *to transport* interstate or foreign commerce, including the territorial seas and waters which are subject to the ebb and flow of the tide." We also urge the Agencies to rescind Appendix D to the *Rapanos* Guidance.

We also support the Agencies' proposal to eliminate "interstate waters" as a standalone category of jurisdictional waters. *See* 84 Fed. Reg. at 4,171. The CWA provides for federal jurisdiction over "navigable" waters, not "interstate" ones and thus, elimination of this category is consistent with the statutory text. In fact, as the Proposed Rule explains, Congress deliberately removed the term "interstate" from the CWA when it overhauled the Federal Water Pollution Control Act in 1972. *See id.* (tracing the history that led to the replacement of "interstate waters" with "navigable waters").

There is simply no statutory or constitutional basis for regulating waters merely because they happen to cross state lines, regardless of whether the waters are TNWs or connected to TNWs. Regulating waters solely on that basis goes far beyond what Congress had in mind in enacting the CWA: "its traditional jurisdiction over waters that were or had been navigable in fact or which could reasonably be so made." *SWANCC*, 531 U.S. at 172 (citing *Appalachian Elec. Power Co.*, 311 U.S. at 407-08). To do so would allow federal assertions of jurisdiction over isolated ponds or primarily dry channels even though such features are not navigable, cannot be made navigable, have no connection or influence to a navigable water, are not adjacent to a navigable water, and contribute no flow to a navigable water. Such an assertion of jurisdiction reads the term "navigable" out of the statute. The Agencies have appropriately proposed to remove this category.

2. Tributaries. Nebraska has a vast and complex network of rivers, streams, and associated tributaries. Much like a transportation system of major highways, less used highways, paved county roads, gravel roads, unmaintained gravel roads, dirt tracks, and trails, the movement of water is complex. The determination of which elements of that system to protect between the various levels of government is difficult. For too long, the federal government has tried to regulate water all the way down to the "dirt tracks and trails". This proposed rule recognizes that each state has the ability to protect its own resources. In Nebraska, if there is an intermittent tributary or ephemeral feature that is outside of WOTUS but important to protection of Nebraska's water quality, the state has authority to provide such protection. Most, if not all, states have similar authority. The important role of the federal government is to provide a base of jurisdiction to those tributaries that are significant for the nation's water quality protection. The proposed definition of "tributary" makes positive improvements in the correct balance of state and federal roles.

One such improvement is that the Agencies would eliminate the "significant nexus" case-by-case test as contained in Justice Kennedy's concurring opinion in *Rapanos v. U.S.,* 547 U.S. 715(2006). Rather, the proposed approach is to include a clear and understandable definition of "tributaries" which incorporates the concerns of Justice Kennedy. As the Justice outlined in his

concurring opinion, Congress intended to include more than just continually flowing or "relatively permanent" streams in its definition of "navigable" as outlined by Justice Scalia in the plurality opinion. To incorporate these additional waters, Justice Kennedy established the "significant nexus" test due to a regulatory void. In the Justice's words "[a]bsent more specific regulations…the Corps must establish a significant nexus on a case-by-case basis" when evaluating adjacency to nonnavigable tributaries. 547 U.S., at 782. The Coalition agrees with the Agencies that the inclusion of both perennial and certain defined intermittent tributaries creates a combined approach of the plurality opinion and the concurring opinion in *Rapanos* and fills the regulatory void identified by Justice Kennedy. We also support omitting from the definition the concepts of "ordinary high water mark" and "bed and banks." Indeed, we strongly urge the Agencies *not* to add these terms to the definition of "tributary." For too long, regulators have overreached when applying the ordinary high water mark concept and consequently, reliance on its use has proven to be disastrous for landowners.

In the proposed definition, tributaries of traditionally navigable waters are identified as a category of WOTUS. In turn, "tributary" is defined as a surface water feature which "contributes perennial or intermittent flow" to a traditionally navigable water in a typical year either directly or indirectly. "Perennial" flow would mean surface water flowing continuously year-round during a typical year and "intermittent" flow would be continuous for certain times of a typical year. Within this definition are some important concepts, dealt with separately as follows:

a. Intermittent tributaries. To fall into this category and thus under WOTUS coverage, flow in the stream or channel must be continuous during "certain times of a typical year" and not in direct response to precipitation. So, for example, a channel that at certain times in a typical year carries continuous flow to traditionally navigable water or other defined category in the definition would be WOTUS. Although the phrase "certain times of a typical year" is [meant] to include extended periods of predictable, continuous seasonal flow when groundwater is high or snowpack is melting, the Coalition has concerns that this language is too open to interpretation. Instead, the definition should contain a specific duration. The agencies suggest an alternate approach of using the flow regime of a typical three-month seasonal period. The three-month period is already recognized as a useful period of time as discussed in the *Rapanos* Guidance so there is current basis for using that duration. While the agencies raise a concern in the preamble that this specificity may not provide for regional variation, the Coalition believes that it is important to specify duration in flow regime for intermittent tributaries. Otherwise, the definition may be open to an interpretation that any length of continuous flow would suffice as "intermittent".

One issue that has been raised is the manner in which intermittent flow would be established. There is concern that, "continuous flow during certain times of a typical year" will be difficult to determine for a layperson/landowner. For example, if the landowner must show groundwater flow in a waterway for a certain period of time in order to establish jurisdictional status, it would be burdensome and costly. Such an evaluation would be a case-by-case determination and it could become as difficult as the significant nexus test. The Coalition urges the Agencies to provide clear, objective field directions for jurisdictional determinations using the most efficient and timely process possible to avoid developing a system that ends up looking like the current bureaucratic process.

The Coalition would encourage the Agencies to evaluate procedural methods to shift the burden of making these determinations away from the landowner and upon the Agencies. In questionable areas of intermittent tributaries (and adjacent wetlands) the landowner should be able to rely on his or her local knowledge of seasonal flow conditions and be able to get validation from the agencies within a set period of time or assume the water is not jurisdictional. Otherwise, the data collection and assessment may be too great for a landowner to accumulate.

The Coalition points out that just because a feature is not determined to be under federal jurisdiction, it does not mean that there is no way to protect such a water deemed by the state to be important. In this case, if an intermittent tributary does not meet the WOTUS test it may still be significant in the state's view and the state has the ability to protect it as such.

b. Typical year. Because this term is used to determine the status of a tributary, it is an important concept. The definition in the rule, as proposed, is a rolling thirty-year normal range of precipitation and the preamble discusses the further technical aspects of "typical year". The Coalition supports this approach to the extent such data is readily available and there are specific and understandable field directions for making this determination. Reference the discussion above on landowner use of local knowledge with quickly available affirmation as a preferred approach to jurisdiction determinations. To the extent this determination is made as objective as possible using the best information and tools available, the rule will maintain its desired goal of clarity. As suggested in the preamble at page 4178, additional detail in the final preamble would be helpful in determining appropriate tools to use; however, flexibility to utilize evolving technology should be built into the text. This same approach should be used to determine the geographic area used in determining a "typical year". Data at the most local scale would produce the best results and evolving technology should be accommodated. Nebraska, from the east to the west, undergoes dramatic climate and precipitation changes and the final rule approach to this definition should provide for local adaptation.

c. Effluent-dependent stream: The Agencies seek specific comment on whether streams that are effluent dependent and flow continuously should be treated as tributaries. Some Nebraska industries and municipalities discharge effluent in a manner which creates effluent dependent streams. By definition, without this treated wastewater (often merely noncontact cooling water) there would be only negligible, intermittent flow. To give these stream segments WOTUS status may bring unintended obligations on the National Pollutant Discharge Elimination System (NPDES) permit holder and others for protection of water which is wholly dependent on wastewater discharge. These segments should not be treated as WOTUS and should be left to the states to manage as a part of the NPDES program.

3. Ditches. The Coalition does not believe that the separate listing of "certain ditches" as a jurisdictional water is needed in the proposed rule. The use of the term "ditches" in the definition is unnecessary and redundant to the other provisions of the proposed WOTUS definition. Rather than a separate category in (a)(1), the same result could be achieved by changing the current proposed language in (b)(4). The proposal would be to eliminate "certain ditches" in (a)(1) and

amend (b)(4) as follows, "(b)(4). Ditches, other than those satisfying any of the conditions identified in paragraph (a)(1) of this section, ditches constructed in a tributary or that relocate or alter a tributary as long as those ditches also satisfy the conditions of the tributary definition, and ditches constructed in an adjacent wetland as long as those ditches also satisfy the conditions of the tributary definition."

Since ditches are essentially being written out of the definition, it could create confusion to list the reference in (a)(1). By putting all of the references to ditches in the exclusion section, it should be clear that ditches are excluded unless otherwise jurisdictional under the definition. It will also affirm that if there are artificial channels used to convey water within a tributary or adjacent wetland structure, it does not cause a disruption in jurisdiction. The term could be eliminated altogether except it may cause confusion of a water body's status when a "ditch" is a part of otherwise covered waters. Thus, the Erie Canal would be WOTUS because it is a "ditch" defined as an "artificial channel used to convey water" but it is not excluded under (b)(4) because it is a perennial tributary.

4. Lakes and Ponds. The Coalition supports termination of use of the significant nexus test for determining jurisdiction of lakes and ponds. The subjectivity and uncertainty of that test leads to inconsistency, confusion, and cost. The changes, as presented, satisfy Justice Kennedy's concern in *Rapanos* of WOTUS covering more than just relatively permanent waters. As proposed, lakes and ponds would be considered to be jurisdictional if they are navigable or susceptible to navigation. Lakes or ponds would also be jurisdictional if they contribute to the flow of other covered waters. Finally, jurisdiction would occur if a lake or pond is flooded in a typical year by other covered waters.

Clarification should be provided for when isolated lakes and ponds are "currently used, or were used in the past, or may be susceptible for use" in commerce. Nebraska has numerous lakes and ponds which are isolated, do not have tributary flow in or out of the lake, and are not prone to flooding in a typical year. Nevertheless, many of these small lakes or ponds could support minimal water borne recreational activity. The question is whether or not these small, groundwater fed lakes and ponds meet the "susceptible for use in commerce" test and are, therefore jurisdictional? The Coalition's comment is that the preamble should clarify that these lakes and ponds are not jurisdictional even though they may support minimal recreation.

5. Impoundments. The Agencies solicit specific comments on maintaining impounded waters as WOTUS. Currently, impoundments of intermittent streams or wetlands that meet the significant nexus test can be determined to be jurisdictional. Proposed rule changes to paragraphs (a)(1) – (a)(4) and (a)(6) eliminate potential inclusion of minor and insignificant impounded waters. This is an improvement of the current rule's impact of including impounded waters in the definition. The agencies ask if it would be beneficial to further define "impounded waters" to cover instances where the effect of the impoundment results in minimal flows downstream thus taking the downstream waterway out of the other categories of WOTUS. The Coalition would support such an effort in order to eliminate some impounded waters from the definition if they have the effect of negating downstream flow and impact on traditionally navigable waters. If the underlying premise of this proposed rule is to protect waters critical to the nation's water quality, then this approach would be consistent. Importantly in Nebraska, any impounded waters affected by this change would be within the authority of state law.

6. Adjacent Wetlands. The proposed rule would make wetlands that are adjacent to otherwise jurisdictional waters covered under WOTUS. By including these specifically defined adjacent wetlands, the Agencies believe that they have preserved the concerns of the three Supreme Court decisions. The Coalition agrees. The language of when a wetland is adjacent is discussed at length in the preamble and it is helpful and should be retained in the final preamble.

The adjacent wetland definition, like other areas of this rule, does away with the need for a significant nexus test and, instead, provides a clear definition of adjacent wetland. Similar to the discussion on tributaries, the Coalition urges the Agencies to specifically define the field jurisdictional determination and develop the most efficient and objective tools for making such determination. The fact that field determinations need to be made is manageable so long as there is consistency, efficiency, and certainty. The more limited nature and scale of these types of field determinations on adjacent wetlands, as defined, versus the current scope of significant nexus evaluations on adjacent wetlands is very different. Nevertheless, lessons should be learned from current bureaucratic inefficiencies and steps should be taken by the Agencies to avoid similar results. Again, reference discussion in change of procedures under the intermittent tributaries above.

The Coalition commends the Agencies on one area of preamble discussion. In Nebraska there are many flowing rivers and tributaries that have an influence on groundwater. In turn, especially during high flows, groundwater influences surface water levels in nearby, isolated wetland areas. The preamble discusses the need for there to be a "direct hydrologic *surface* connection" (emphasis added) between the jurisdictional water and an adjacent wetland. The text also expressly states that the definition does not include subsurface hydrologic connectivity as a basis for determining adjacency. The example of a seasonal high flow period in which a tributary recharges groundwater which then expresses itself in a nearby isolated wetland is addressed on page 4189 and the Coalition's understanding is that such an example would not result in the isolated wetland becoming WOTUS. The Coalition agrees with this outcome and, once again, points out that Nebraska has authority and programs to manage both the surface water and groundwater in this example.

7. Waters and Features that are not WOTUS. Paragraph (b) of the definition lists 11 specific waters or features that are excluded from the WOTUS definition. One such feature is groundwater, including groundwater flowing through subsurface drainage systems. This specific exclusion for groundwater will clarify that groundwater is not WOTUS which is particularly important for Nebraska. There are many protective groundwater programs in Nebraska at both the state and local level. The Nebraska Natural Resources Districts have extensive planning and regulatory approaches to management of groundwater. Likewise, the NDEQ has both mandatory and voluntary programs to protect groundwater. Congress left protection of groundwater to the states and Nebraska has exercised that authority.

The Coalition also supports specific listing of ephemeral features as being excluded from WOTUS. Landowners in Nebraska, ranging from farmers and ranchers to agri-business to golf course management and any outdoor activity-based business know the importance of managing landscape features and their impact on water movement. To overextend federal jurisdiction into innocuous ephemeral features as proposed under the 2015 Clean Water Rule would only confuse or paralyze prudent management. This exclusion helps landowners know how to better manage

common landscape features with confidence.

The Coalition is very supportive of retention of the prior converted cropland (PCC) exclusion and, further, the clarification of how that exclusion works. Regulatory certainty for farmers and ranchers in managing prior converted wetlands is important and coordination with United States Department of Agriculture (USDA) to provide certainty on benefit availability is a key component. The Coalition encourages the agencies to follow through with consultation with other agencies, primarily USDA on prior converted wetlands determinations.

We support the proposed regulatory text and the preamble text clarifying how the Agencies interpret the PCC exclusion. However, the Agencies should clarify—either in the text or the preamble—that there is a broad array of uses of PCC "in support of" agricultural purposes, such as idling land for conservation purposes; idling land to protect wildlife; irrigation tailwater storage and recovery; crawfish farming; and allowing land to lie fallow following natural disasters such as hurricanes (for example, to offset saltwater intrusion). While these uses may look like the land has been abandoned, they are "in support of" agricultural purposes and should be expressly recognized as such. We also urge the Agencies to clarify in the final rule that PCC includes ditches, canals, and other features within PCC.

The exclusion in (b)(7) for artificial lakes and ponds constructed in uplands makes an important additional clarification of specifically listing water storage reservoirs and farm and stock watering ponds to the exclusion. These types of upland features are present not only on farms and ranches but on many businesses and industries needing water storage capacity. We would, however, recommend that the Agencies codify the preamble clarifications in the text of the Final Rule. In particular, the Final Rule should explicitly exclude lakes and ponds *"constructed in upland, constructed by impounding non-jurisdictional waters or features, or were constructed in jurisdictional waters prior to the enactment of the Federal Water Pollution Control Act of 1972.*"

Paragraph (b)(8) is the already existing exclusion for water filled depressions incidental to construction and the additional reference to mining activity is appropriate for upland features.

Finally, the (b)(9) exclusion of stormwater control features constructed in upland is positive. Increased use of stormwater control features in land development and other projects makes this more inclusive definition more clear, more suitable to current practices, and is beneficial to water quality management. The Agencies should also clarify that this exclusion encompasses conservation infrastructure found on agricultural lands—such as grassed waterways, restored wetlands, conservation ponds, and sediment basins—or that such infrastructure falls under another exclusion. To avoid creating disincentives to water quality conservation practices and infrastructure, the Agencies should make it clear that these conservation features are *not* jurisdictional.

8. State data and interactive mapping. The Coalition is interested in the discussion of developing geospatial data tools to provide a platform for location of federally jurisdictional waters and other components important to administering the CWA. The Coalition supports development of tools to help make field determinations efficient, consistent, and objective. Indeed, the discussion above on readily available data is key to making the process efficient and workable.

The Coalition does caution, however, that care must be taken in creating maps and other tools which define types of waters, beneficial uses and water quality standards, and other matters that directly affect the landowner and use of land. For example, if jurisdictional determinations are to be based upon interactive mapping, there must be a process for data verification and other avenues to ensure that the landowner's ability to contest the determination are preserved before they become final. Communication of initial findings or presumptive jurisdictional areas would be most effective through state or local agencies or extension offices. This would improve local knowledge in working with landowners and help ensure that any water management is done with full knowledge and input of stakeholders.

General Comments and Summary

From a high-level perspective, the Agencies approach to the WOTUS definition as proposed is supported by the Coalition. The preamble at page 4170 summarizes, "the Agencies would interpret the term "the waters" in the phrase "waters of the United States" to encompass relatively permanent flowing and standing waterbodies that are traditional navigable waters in their own right or that have a specific connection to traditional navigable waters, as well as wetlands abutting or having a direct hydrologic surface connection to those waters." Further, the Agencies propose to eliminate the case-by-case application of the significant nexus test. This approach has led to unnecessary time to make jurisdictional determinations which leads to extraordinary costs associated with those determinations. As the Agencies fill out the detail of their overall approach, the proposal makes significant strides to accomplish needed improvements.

Also a part of the preamble discussion is the desire of the agencies to fulfill a CWA goal of Congress in resetting the state/federal co-implementer role. As mentioned numerous times in the preamble discussion, the states are co-implementers of the CWA. Congress recognized that certain water bodies were important to the nation as a whole but that other waters would be managed by the states. The Coalition encourages a true co-implementer program going forward and the changes proposed in the rule help clarify and support this approach.

As explained, in Nebraska the Section 402 permit program has been administered by the NDEQ since the mid 1970s. The state agency has administered the program under delegation from EPA since that time primarily relying on the state adopted definition of "waters of the state". There has been very little controversy with how the Agency has applied this definition. Witness the fact that there is no recorded case law of parties contesting the scope of the term. In contrast, the Section 404 program has been administered by the Corps and, similar to the national scene, there has been much confusion and controversy in this program. There is a current and active effort by the Agencies to make it more attractive for states to adopt the Section 404 program. The Coalition supports this evaluation and is encouraged by the EPA and State effort.

As stated, the protection of water quality in Nebraska is important to all if its citizens and many laws and regulations are in place to achieve this goal. In order for the protections to be most effective while being clear and understandable, roles of all governmental agencies must be defined. Elimination of such current features as the "significant nexus" test improve the clarity and certainty of the definition of WOTUS. The proposed rule, with the above comments in mind, would improve the delivery of governmental service and would enhance water quality protection.

Thank you for the opportunity to submit these comments and we look forward to finalization of this proposed rule.

Sincerely,

Common Sense Nebraska Coalition.

AKSARBEN Club Managers Association
Association of General Contractors - NE Chapter
Farm Credit Services of America
Iowa-Nebraska Equipment Dealers Association
National Federation of Independent Businesses/Nebraska
Nebraska Agribusiness Association
Nebraska Association of County Officials
Nebraska Association of Resource Districts
Nebraska Bankers Association
Nebraska Cattlemen
Nebraska Chamber of Commerce and Industry
Nebraska Cooperative Council
Nebraska Corn Board
Nebraska Corn Growers Association
Nebraska Farm Bureau Federation
Nebraska Golf Course Superintendents Association
Nebraska Grain and Feed Association
Nebraska Grain Sorghum Association
Nebraska Grain Sorghum Board
Nebraska Pork Producers Association
Nebraska Poultry Industries
Nebraska Rural Electric Association
Nebraska Soybean Association
Nebraska State Dairy Association
Nebraska State Home Builders Association
Nebraska State Irrigation Association
Nebraska Water Resources Association
Nebraska Wheat Board
Nebraska Wheat Growers Association
Nemaha Natural Resources District
Pawnee County Rural Water District #1