

**PROGRAM TASK & ID: WPCP-1. North Platte Choke Point**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$10,000		

Task Description

The objective of this task is to increase and maintain an active river channel capacity of 3,000 cfs on the North Platte River at North Platte. Channel capacity improvements will provide the Program with more flexibility in implementing flow tests made under the Adaptive Management Plan and in delivery of Program water to meet shortage reduction to target flow goals under the Water Plan. WPCP-1 costs are summarized below.

Item	Cost
State Channel Berm Maintenance	\$10,000
TOTAL	\$10,000

Notes on Cost

Routine maintenance and repair of the state channel berm and the Albrecht property will include tasks such as mowing, minor earthwork repair, culvert cleanout, and channel debris maintenance, as needed to maintain project function.


PROGRAM TASK & ID: WPRT-1. Retiming Projects: Canal Recharge

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$263,000		

Task Description

The Program's Water Action Plan projects include retiming of excess flows through intentional groundwater recharge in CNPPID, NPPD and CPNRD canal systems. Recharge operations will occur during the non-irrigation season as conditions allow. Estimated WPRT-1 recharge costs are summarized by district/canal below.

Item	Cost
CNPPID Phelps Canal	\$0
NPPD Canals	\$108,000
CPNRD Canals	\$155,000
TOTAL	\$263,000

Notes on Cost
Phelps County Canal Ground Water Recharge

As it has done since 2011, the Program intends to continue retiming excess flows through intentional groundwater recharge in the Phelps County Canal in 2023 and each successive year through the end of the First Increment Extension in 2032. Recharge operations can occur during the non-irrigation season as conditions allow, subject to the availability of excess flows, groundwater elevations below designated thresholds, and ice-free operating conditions. To facilitate recharge, a check structure at Mile Post (MP) 13.3 allows water to pool in the canal and seep into the aquifer. The CNPPID will obtain the necessary permits from Nebraska DNR to divert unappropriated excess flows for groundwater recharge.

The Program and CNPPID are finalizing the terms of a 10-year (2023-2032) recharge agreement through the end of the First Increment Extension, which is expected to be presented to the GC for approval in December 2022. The agreement will reserve for the Program a minimum of 75% of total excess flow diversions into Phelps County Canal as measured at CNPPID's flume at MP 1.6. Funding for the 10 years of excess flow diversions will be derived from approximately \$9.2 million of First Increment funds made available by the Program's withdrawal in late 2022 from the WSA between the Program, CNPPID, and the State of Nebraska for the J-2 Regulating Reservoirs Project.¹ If the total pre-paid volume of excess flows is not diverted for recharge by the end of 2032, any unspent funds will be refunded to the Program by CNPPID or carried forward on a year-by-year basis.

No funds need to be budgeted for Phelps County Canal groundwater recharge in 2023 due to the agreement described above. Costs associated with the Cook recapture well that were included in this line item in previous years were moved to WPRT-4 (recapture wells).

¹ Amendment No. 3 to the Water Service Agreement for the J-2 Regulating Reservoirs Project was approved by the PRRIP Governance Committee in September 2022.



NPPD Gothenburg and Dawson County Canal Ground Water Recharge

The Program has a WSA with the NPPD effective January 1, 2020 through December 31, 2025, for diversion of excess flows into the Gothenburg and Dawson County Canals for groundwater recharge operations during the non-irrigation season. Per the terms of the WSA, the Program will pay NPPD for a Net Amount Diverted, which is defined as “the flow measured by NPPD using the Gothenburg Canal and Dawson County Canal measuring flumes located near the river head gates...and subtracting each canal’s river returns as measured by NPPD.” To facilitate the project, NPPD will obtain the necessary permits from Nebraska DNR to divert unappropriated excess flows for groundwater recharge. Details of anticipated 2023 CPNRD canals groundwater recharge are shown in the table below. Actual expenditures by the Program will be based on measured diversions into the Gothenburg and Dawson County Canals for groundwater recharge in 2023.

Item	Value
Water Service Agreement	Expires December 31, 2025
Unit Cost	\$35.91 per acre-foot
Estimated Volume ¹	4,300 acre-feet
Budget²	\$155,000

¹ Estimated volume based on 2015-2021 net recharge (range 563 to 9,433 acre-feet, average = 4,300 acre-feet).

² Unit Cost × Estimated Volume, rounded to the next \$1,000.

CPNRD Orchard-Alfalfa, Thirty Mile and Cozad Canal Groundwater Recharge

The CPNRD diverts excess flows for non-irrigation season recharge through the Orchard-Alfalfa, Thirty Mile, and Cozad canals. Appropriations for recharge diversions (100 cfs each at Thirty Mile and Cozad, 75 cfs at Orchard-Alfalfa) were approved by the Nebraska DNR in 2015. Details of anticipated 2023 CPNRD canals groundwater recharge are shown in the table below. Actual expenditures in 2023 will be based on the net recharge volume (measured diversions minus any returns/spills).

Item	Value
Water Service Agreement	Expires December 31, 2024
Unit Cost	\$35.91 per acre-foot
Estimated Volume ¹	3,000 acre-feet
Budget²	\$108,000

¹ No diversions for recharge were made in 2019, 2021, or 2022. The most recent net recharge diversion was 2,950 acre-feet in 2020.

² Unit Cost × Estimated Volume, rounded to the next \$1,000.

**PROGRAM TASK & ID: WPRT-2. Retiming Projects: Elwood Reservoir Recharge**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$0		

Task Description

The Program's Water Action Plan projects include retiming of excess flows through intentional groundwater recharge in CNPPID's Elwood Reservoir. Recharge operations can occur throughout the year as conditions allow, subject to the availability of excess flows and ice-free operating conditions.

Notes on Cost

As it has done since 2015, the Program intends to continue purchasing excess flows delivered into Elwood Reservoir in the CNPPID system for recharge in 2023 and each successive year through the end of the First Increment Extension in 2032. Elwood Reservoir is an unlined reservoir that acts as a holding basin to allow excess flows to seep and recharge the alluvial aquifer. Excess flows are delivered through the E-65 Canal to the Carl T. Curtis Pump Station, which pumps the water into Elwood Reservoir. The CNPPID will obtain the necessary permits from Nebraska DNR to divert unappropriated excess flows for recharge.

The Program and CNPPID are finalizing the terms of a 10-year (2023-2032) recharge agreement through the end of the First Increment Extension, which is expected to be presented to the GC for approval in December 2022. The agreement will reserve for the Program a minimum of 50% of total excess flow diversions into Elwood Reservoir. Funding for the 10 years of excess flow diversions will be derived from approximately \$9.2 million of First Increment funds made available by the Program's withdrawal in late 2022 from the WSA between the Program, CNPPID, and the State of Nebraska for the J-2 Regulating Reservoirs Project.² If the total pre-paid volume of excess flows is not diverted for recharge by the end of 2032, any unspent funds will be refunded to the Program by CNPPID or carried forward on a year-by-year basis.

In late 2019, CNPPID identified a seepage issue at the base of the dam near the Carl T. Curtis pump station. Efforts have been underway since then to diagnose the problem and design a solution. During this time, Elwood Reservoir has been operating under a reduced maximum pool elevation, which in turn has limited the storage capacity available for diversion of excess flows for groundwater recharge. It is anticipated that construction of the necessary repairs will be completed in 2023. The ability to operate Elwood Reservoir at full capacity is essential for the Program to achieve its water goals by recharging as much water as possible through this Water Action Plan project. As part of the proposed long-term recharge agreement between the Program and CNPPID, the Program will also contribute \$2 million towards the installation of a seepage control system at Elwood Reservoir using funds made available by withdrawal from the J-2 Agreement.

No funds need to be budgeted for Elwood Reservoir groundwater recharge in 2023 due to the agreement described above.

² Amendment No. 3 to the Water Service Agreement for the J-2 Regulating Reservoirs Project was approved by the PRRIP Governance Committee in September 2022.


PROGRAM TASK & ID: WPRT-3. Retiming Projects: Broad-Scale Recharge

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$72,000		

Task Description

The Program constructed a broad-scale recharge project at the Cottonwood Ranch Complex, which included earthen berms and water control structures to allow for the ponding of water in eight individual cells and subsequent recharge of the alluvial aquifer. The water is delivered to the property through a pipeline from the Phelps County Canal at times when the Platte River flow at Grand Island is in excess of USFWS target flows, and the infiltrated water returns to the Platte River over time. Estimated WPRT-3 recharge costs are summarized by item below.

Item	Cost
Rubicon Gate/SCADA Service & Maintenance	\$6,000
Electricity	\$400
Berm maintenance	\$62,500
Groundwater monitoring	\$3,000
TOTAL	\$71,900 Rounded to \$72,000

Notes on Cost

About 456 AF of excess flow water was delivered to the project from the Phelps County Canal between March 30 and April 5, 2022. Recharge operations are expected to continue at any time of year, subject to the availability of divertible excess flows and ice-free operating conditions. The CNPPID will charge the Program \$28.15 per acre-foot (based on a 2% annual escalator) for water diverted to the delivery pipeline in 2023. However, the Program will not be responsible for a cash payment to the CNPPID until the cost of water deliveries exceeds the cost of the design and construction of the delivery pipeline. Following deliveries in 2020 and 2022, the remaining balance of the pipeline cost is \$957,876.23. At 2023 rates, the estimated pipeline costs are equivalent to about 34,000 acre-feet of water deliveries. This far exceeds anticipated deliveries to Cottonwood Ranch in 2023, so no additional budget is included for water deliveries.

Seven of the eight water control structures at the Cottonwood Ranch project are solar powered, self-regulating gates manufactured by Rubicon. Gates are linked to a cellular SCADA system allowing EDO staff to remotely operate the gates and monitor their performance. Annual Rubicon gate maintenance will cost \$1,400 (~\$200 per gate). The annual cost of the subscription to the remote-control software is \$4,600 (~\$650 per gate). The annual maintenance and subscription will be budgeted for each year.

Electrical power service from Southern Power to power pipeline valves and other equipment is estimated to be approximately \$400 (~\$33.00 per month).



Some amount of annual maintenance will be necessary at the project site. This could include fixing berms or spillways that are damaged from high flows or precipitation events, re-seeding berms, replacing riprap, or other things of this nature. The Nebraska Resources Development Fund Guidelines recommends budgeting 1.25% of the constructions costs per year for maintenance for projects similar to the broad-scale recharge project. Given the capital cost of the project (\$5,000,000), \$62,500 has been budgeted for general site and berm maintenance.

Project water accounting for the Program and for regulatory agencies (Department of Natural Resources and Tri-Basin Natural Resources District) will be accomplished through detailed monitoring of water surface levels in the recharge basins and the Peterson Drain. It is estimated that about \$3,000 will be needed for new and/or repaired equipment, which equates to about two new data loggers.

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PROGRAM TASK & ID: WPRT-4. Retiming Projects: Recapture Wells

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$325,000		

Task Description

Groundwater recapture projects are retiming projects utilizing the water from existing recharge operations, such as the Phelps County Canal groundwater recharge project and Elwood Reservoir recharge. Since recharge accretions are not controllable and may return to the river during excesses to target flows, groundwater recapture allows the Program to pump intentionally recharged water to the river during shortage periods to maximize the deficit reduction provided by the already recharged water.

Notes on Cost

The Program entered into a Water Augmentation Agreement with the Tri-Basin Natural Resources District (TBNRD) to construct and operate a network of wells to recapture water recharged through the Phelps County Canal, Elwood Reservoir, and the Cottonwood Ranch broad-scale recharge project. Construction of seven recapture wells and associated transmission pipelines is nearly complete. Per the Program's water service agreement with Tri-Basin NRD, all project operations costs will be reimbursed by the Program with no markup. The seven new wells have been operational since May 2022 and some of the annual project costs are now known, but electricity and maintenance costs remain highly uncertain.

Additionally, an Amendment to the Water Augmentation Agreement was approved by the Program's Governance Committee in March 2022 to incorporate the Program's existing Cook recapture well (constructed in 2016) into the new recapture network. Responsibility for operation and maintenance of the well was transferred to TBNRD, and all associated costs are to be reimbursed by the Program. Cost estimates in the table below reflect inclusion of the Cook well with the seven new recapture wells.

Item	Cost
Electricity	\$75,000
Well/Pipeline Maintenance	\$10,000
Tri-basin NRD Staff Time, Expenses, and Indirect Costs	\$25,000
Easements	\$12,000
SCADA system software subscription	\$2,100
TOTAL	\$124,100 Round to \$125,000

The Program has also initiated preliminary discussions with Nebraska DNR and CNPPID regarding potential recapture expansion in the form of a gravity outlet from Elwood Reservoir to Plum Creek and/or construction of additional wells. The proposed budget for 2023 includes \$200,000 for a study to be conducted by an outside consultant, which may take the form of a tradeoff analysis or feasibility assessment. This brings the total 2023 budget for recapture projects under WPRT-4 to \$325,000.


PROGRAM TASK & ID: WPST-1. Storage Leases: Lake McConaughy Sources

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$24,801,000		

Task Description

For several years, the Program has leased surface water from CPNRD and NPPD under a succession of one-year agreements. The leased surface water is credited to the Lake McConaughy EA in October each year. The Program is engaged in negotiations with both CPNRD and NPPD to secure the continuation of these leases through the end of the First Increment Extension in 2032. The Program is also negotiating with CNPPID on a potential long-term lease of storage water that could be credited to the Lake McConaughy EA each year. Estimated WPST-1 leasing costs are summarized by source below.

Item	Cost
CPNRD Surface Water Lease	\$12,825,000
NPPD Surface Water Lease	\$2,976,000
CNPPID Storage Lease	\$9,000,000
TOTAL	\$24,801,000

Notes on Cost

The money included in this line item assumes the Program and the three districts are successful in negotiating 10-year agreements to lease water each year through the end of the First Increment Extension, and that all water leased for the duration of the agreements is to be pre-paid in 2023. Assuming terms similar to the long-term recharge agreement with CNPPID, if the total pre-paid volume of leased water is not credited to the Lake McConaughy EA by the end of 2032, any unspent funds will be refunded to the Program or carried forward on a year-by-year basis.

Details of the anticipated 2023-2032 CPNRD surface water leasing are shown in the table below.

Item	Value
Unit Cost	\$90.00 per acre-foot
Assumed Volume ¹	14,250 acre-feet per year
Budget²	\$12,825,000

¹ Based on maximum lease volume from 2018-2022.

² Unit Cost × Estimated Volume × 10 years, rounded to the next \$1,000



Details of the anticipated 2023-2032 NPPD surface water leasing are shown in the table below.

Item	Value
Unit Cost	\$90.00 per acre-foot
Assumed Volume ¹	3,306 acre-feet
Budget²	\$2,976,000

¹ Based on maximum lease volume specified in the 2022 Water Leasing Agreement.

² Unit Cost × Estimated Volume × 10 years, rounded to the next \$1,000.

Details of the anticipated 2023-2032 CNPPID surface water leasing are shown in the table below.

Item	Value
Unit Cost	\$90.00 per acre-foot
Assumed Volume ¹	10,000 acre-feet
Budget²	\$9,000,000

¹ Based on volume discussed during preliminary negotiations.

² Unit Cost × Estimated Volume × 10 years, rounded to the next \$1,000.

**PROGRAM TASK & ID: WPST-2. Storage Leases: Upstream Sources**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$624,000		

Task Description

This line item includes leasing of surface water from sources upstream of Lake McConaughy, which presently consists of water leased from Wyoming's Pathfinder Municipal Account. Estimated WPST-2 leasing costs are summarized below.

Item	Cost
Pathfinder Municipal Account Lease	\$624,000
TOTAL	\$624,000

Notes on Cost*Pathfinder Municipal Account*

The Program has a contract with the Wyoming Water Development Office (WWDO) for water from the Municipal Account in Pathfinder Reservoir. The contract is effective on January 1, 2020, and the term extends until December 31, 2032. For 2023, the maximum water available from the Pathfinder Municipal Account is 9,600 acre-feet at a unit cost of \$65 per acre-foot. The resulting 2023 budget is \$624,000.

**PROGRAM TASK & ID: WPIR-1. Irrigator Leases**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$310,000		

Task Description

The Program can temporarily lease surface water rights from individual irrigators under the CNPPID system. Irrigators then dryland farm the enrolled parcels, which are generally odd-shaped or hard-to-irrigate lands, during the term of the lease agreement. The consumptive use portion of the surface water—9 inches per acre during a full-allocation year—is available in Lake McConaughy and transferred into the EA for the Program. The CNPPID serves as the administrator, managing the individual lease agreements, processes, and operations. The Program and the CNPPID agreed upon a 5-year extension of the irrigator lease, beginning with the 2019 irrigation season, and continuing through the 2023 irrigation season. The table below provides details of the CNPPID irrigator lease for 2023.

Item	Value
Water Leasing Agreement	Expires December 31, 2023
Unit Cost ¹	\$100 per enrolled acre
Assumed Enrollment ²	3,000 acres
CNPPID Administration Fee	\$10,000
Budget³	\$310,000

¹ Pricing Addendum for 2021 reduced the unit cost from \$220 per acre to \$100 per acre. Terms for 2023 are unchanged.

² Maximum acreage specified in the Water Leasing Agreement.

³ Unit Cost × Estimated Enrollment, plus CNPPID Administration Fee.

With full enrollment, the CNPPID irrigator lease would result in 2,250 acre-feet credited to the Lake McConaughy EA in October 2023. Actual cost and project yield will be based on irrigator lease enrollment for the 2023 irrigation season.

**PROGRAM TASK & ID: WPLW-1. General Maintenance of Land-for-Water Properties**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$21,000		

Task Description

This line item includes the funds necessary for general land management and maintenance activities at Program properties acquired for developing Water Action Plan projects, including the Lindstrom, Edlund, and Lakeside tracts.

Notes on Cost

Associated tasks and individual budgets are shown in the table below. See **Appendix A** of the full work plan document for more detail.

Item	Cost
Fence & Road Maintenance	\$1,000
Noxious Weed Control	\$8,000
Mowing	\$1,000
Tracts W2016002 and W2017001 Electricity	\$100
Taxes	\$10,500
BUDGET	\$ 20,600 Round to \$21,000

**PROGRAM TASK & ID: WPWM-1. Water Monitoring Activities**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$38,000		

Task Description

The Program maintains a network of surface and groundwater monitoring locations equipped with manual and automated data loggers. Data from this network provides information on regional groundwater levels, river and wetland stage, and surface/groundwater interactions. In addition, the Program leases two weather stations and shares in the expense of maintaining three stream gages in the upper portion of the AHR. Estimated WPWM-1 costs are summarized by item below.

Item	Cost
Groundwater Monitoring	\$12,420
Cottonwood Ranch Stream Gages	\$20,000
Overton Stream Gage	\$5,000
BUDGET	\$37,420 Round to \$38,000

Notes on Cost

The Program maintains two monitoring wells that provide essential data for the Phelps County Canal groundwater recharge project. These wells are equipped with telemetry units requiring a subscription to In-Situ's HydroVu data management service. Weather stations on the Program's Binfield South and Morse properties are maintained by Nebraska Mesonet for an annual fee. Data loggers and other equipment require ongoing maintenance and replacement, as shown in the following table.

Item	Unit cost	Units	Quantity	Total
Hydro Vu subscription	\$240	ea.	2	\$480
AWDN Annual Maintenance	\$2,600	ea.	2	\$5,200
Desiccant: Interra sSORB blue indicating silica gel	\$30	lbs.	5	\$150
Additional large desiccant containers	\$200	ea.	5	\$1,000
Staff gage replacements	\$35	ea.	4	\$140
Channel posts, 6'	\$10	ea.	10	\$100
In-Situ Level Troll maintenance	\$1,400	ea.	2	\$2,800
In-Situ Tube telemetry maintenance	\$900	ea.	2	\$1,800
In-Situ Troll Com	\$750	ea.	1	\$750
BUDGET				\$12,420

In addition to the items in this table, stream gages have been installed at the request of the Program. The U.S. Geological Survey (USGS) installed and maintains two gages located on the Cottonwood Ranch Complex. These gages are used primarily in conjunction with geomorphology and sediment augmentation related research. Annual maintenance costs include physical maintenance of the gage, checking and



adjusting the rating curve through field measurements, QC/QA of the data, and making data available real-time. The USGS gages were established in a service agreement negotiated and still held by NPPD, but with the costs passed through to the Program. Costs are set at \$20,000 but vary slightly annually if significant equipment components, such as probes or cables, need replacing.

The Program will also cost-share with CNPPID for the continued operation of the USGS gage at Overton, NE. The Overton gage is essential to Program decision-making through the availability of real-time data provided by the USGS equipment. Costs for this arrangement are anticipated to be about \$5,000 based on past experience.

There are two entities in Nebraska that can establish official stream gaging stations, the USGS and the NDNR, and these stations must be official gaging stations to establish scientific rigor and credibility. Because there are no other options for establishing an official stream record through a competitive selection process, and because each entity is a government agency bound by their rules and regulations for providing their services and the associated costs, and because the USGS costs are comparable to the NDNR costs; therefore, these rates (total \$25,000) are considered fair and reasonable.

**PROGRAM TASK & ID: WPMT-1. Water Management Tools (COHYST)**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$0		

Task Description

The COHYST Tool provides an integrated surface water, ground water, and watershed model for the Platte River between Lake McConaughy and Duncan, Nebraska. It is a tool used by the NDNR for water planning and administration, and it is anticipated to be a valuable tool for project planning and evaluation efforts under the PRRIP Water Plan. As a user of the modeling tool, the PRRIP may require additional training or support from the consultants that developed the model.

The funds budgeted for this line item have not been used for several years, so no new funding is proposed for 2023.

**PROGRAM TASK & ID: WPSA-1. EDO Special Advisors– Water Plan**

YEAR	BUDGET	BUDGET ADJUSTMENTS	EXPENDITURES
2023	\$20,000		

Task Description

The EDO may rely on Special Advisors to assist in Water Plan-related issues beyond staff expertise or to assist with short-term schedule challenges. These areas may include but are not limited to water infrastructure and design, structural, and hydrogeology/ground water. Estimated WPSA-1 costs are summarized by item below.

Item	Cost
Hydrogeology and Groundwater	\$ 10,000
Civil Infrastructure	\$ 10,000
BUDGET	\$ 20,000

Notes on Cost*Hydrogeology and Groundwater*

Several projects include hydrogeologic elements that may require further expertise, including ground water recharge projects, ground water recapture pumping projects and other projects with a ground water component. Projects may include the Elwood Reservoir recharge project, the Phelps, CPNRD, and NPPD canal recharge projects, the recapture well network, and any COHYST or other groundwater model scenario runs. A specific hydrogeology and groundwater Special Advisor will be solicited and contracted on an as-needed basis.

Civil Infrastructure

Special Advisors in the area of civil infrastructure have been utilized by the EDO in the past for projects such as slurry wall gravel pits and analysis of proposed solutions to capacity constraints at the North Platte chokepoint. A specific civil infrastructure Special Advisor will be solicited and contracted on an as-needed basis.

General note on all Special Advisor budget line items: Please refer to the third paragraph in the Exceptions: section of the Procurement Policy adopted by the GC in June 2016, “Retention of special advisors to the ED of a technical or legal nature is exempt from the procedures provided in this directive.”

Consequently, Special Advisors are not selected through a competitive process involving advertised RFQs or RFPs. Special Advisors are selected by the Executive Director (ED) based on qualifications – education, relevant experience, expertise and skills, reliability, credibility, and ability to work effectively with the ED and the staff of the ED Office. Special Advisors and the firms they are associated with cannot do any other work for the Program, individually or as part of a team. This is a critical restriction and generally orients special advisor selection to individuals who are sole proprietors or part of small firms that would not likely be doing significant levels of work for the Program on other specific, larger projects.



The billing rates are negotiated with the special advisors by the ED and are kept within the industry standard of practice based on each individual's qualifications. While industry standard of practice may not be precisely defined, anyone who is a practicing member of that professional community understands the limits of reasonableness associated with those boundaries. Appropriate expertise to make this assessment resides with the ED or ED Office staff. The industry standard of practice rates guidelines used in this process is established based on an on-going market survey process comparing labor rates of similarly qualified professionals in the field.

In the case of Special Advisors, individuals with similar experience and qualifications have been part of consultant teams selected through the Program's competitive procurement process over an eight-plus-year period. Comparison of the Special Advisor rates to the rates charged by comparable individuals through the competitive procurement process provides an indisputable basis for comparison. In all cases the Special Advisor rates are not only within the range of rates seen on the consultant teams which have been selected competitively, but typically at the middle to lower end of the range. As rates charged by Special Advisors are at the middle to low end of the range of rates for similar work acquired through the Program's competitive procurement process, the estimate for Special Advisors is considered fair and reasonable.

The anticipated level of effort for the upcoming year is also discussed with the special advisors by the ED and members of the EDO staff, but all work is assigned on an as-needed basis with no guarantee of any minimum level of assignments. During the budgeting process, the Special Advisors anticipated to be needed and roughly the level of effort expected to accomplish the work plan for the budget year is scrutinized by and discussed with the appropriate advisory committees, the Finance Committee, and the GC. Input is received and taken under advisement from all these sources as to the appropriateness of the budgets for these line items with appropriate adjustments made prior to budget finalization.