

Oct. 12, 2004

Daniel Smith, MRNRD Manager and MRNRD Board of Directors
Middle Republican Natural Resources District
P.O. Box 81
220 Center Ave.
Curtis, NE 69025

Dear Daniel and MRNRD Board of Directors,

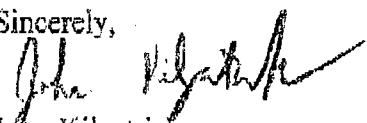
Following are comments to the proposed rules and regulations for the Ground Water Management Area and the Integrated Management Plan (IMP) currently being considered by the Middle Republican Natural Resources District (MRNRD).

Also under Chapter 6, the IMP must have as a purpose "sustaining a balance between water uses and water supplies so that the can be achieved and maintained for both the near term and the long term". However, under the Ground Water Management Area Rules and Regulations that were adopted July 1, 1998 and last revised in November, 2003, the requirement was to "maintain, in accordance with the districts ground water management plan, a ground water reservoir life of at least seventy-five years." This would seem contradictory with the idea of sustaining a balance between uses and supplies and manages for the end of the economic viability, social and environmental health, safety, and welfare of the Republican River Basin within a few generations.

In addition to compliance with the Republican River Compact, additional values of surface water should be considered. Because the IMP accounts for the connection between surface water and ground water, any reductions in surface water declines are important to the owners of Nebraska's natural resources, the citizens themselves. Advances are being made that put values on surface water dependent recreational goods and services, fish and wildlife, and quality of life for Nebraskans. It would seem wise to include information regarding these and other surface water socio-economic values. Additionally, surface water quality for fish, wildlife and recreational uses, as well as water quality issues related to NPDES Permits, TMDL's, and Section 401 Water Quality Certification, are examples of surface water quality issues that could be benefited by IMPs.

Your development of the IMP is to be commended. Restoration of flows to the Republican River will bring renewed benefits for fish and wildlife resources, which will in turn increase quality of life and economic benefit to the area.

Sincerely,



John Kilpatrick
Fisheries Biologist
Nebraska Game and Parks Commission