

RHP



# Nebraska Game and Parks Commission

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Oct. 12, 2004

Roger K. Patterson, Director  
Nebraska Department of Natural Resources  
301 Centennial Mall South  
Lincoln, Nebraska 68509-4676

RECEIVED  
OCT 15 2004  
DEPARTMENT OF  
NATURAL RESOURCES

Dear Roger,

It is our understanding that Department of Natural Resources (DNR) will be holding a hearing on these proposed rules today, and that the hearing record will be open until October 19. Larry Hutchinson of our staff has reviewed the DNR's Rules for Chapter 13 - Integrated Management Plans (IMP) concerning types of data to be considered and discussed them with Ann Bleed and Ann Diers of your staff. At their suggestion, we are offering some recommendations for amendments to some of these proposed rules.

It appears to us that some of the data rules to be considered for groundwater should also apply to surface water.

For example, item 0001.11 "Groundwater quality concerns within the proposed integrated management plan area," does not have a counterpart for surface water quality concerns within the proposed integrated management plan area. 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 affected by IMPs.

Item 001.13 requests existing subirrigation uses within the proposed integrated management plan. In times of drought, many subirrigated areas literally may not exist at the time of developing IMPs as they had in the past. Perhaps this rule can be modified to account for normal condition subirrigated areas.

Item 001.14 requests relative economic value of different uses of groundwater, but there is no counterpart for relative economic value of different uses of surface water. Advances are being made that put values on surface water dependent recreational goods and services, fish and wildlife, and quality of life of Nebraskans. It would seem wise to include a data item that includes these and other surface water socio-economic values.

**COPY**

Please consider our suggestions in developing your final rules under Chapter 13.

Sincerely,

A handwritten signature in black ink that reads "Rex Amack". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Rex Amack, Director  
Nebraska Game and Parks Commission

C: Kirk Nelson

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