CITY OF WICHITA

Department of Public Works & Utilities

October 16, 2014

Ms. Jackie McClaskey, Secretary
Kansas Department of Agriculture
1320 Research Park Drive
Manhattan, Kansas 66502

Mr. Tracy Streeter, Director
Kansas Water Office
900 SW Jackson, Suite 404
Topeka, Kansas 66612

Dear Madam Secretary McClaskey and Mr. Streeter:

The City of Wichita is very supportive of the efforts of the State of Kansas to craft a fifty-year vision for the future of water in Kansas. The very robust public engagement process has been impressive. At this point, it is clear that the draft of the "Vision for the Future of Water in Kansas" presented at this year's Governor's Conference on the Future of Water in Kansas will be very different than the preliminary discussion draft.

Given this dynamic and interactive process, the City of Wichita has elected to provide this letter to express our thoughts and concerns as the vision document evolves. Our comments are based on a review of Preliminary Discussion Draft and City staff's observations from a number of the public engagement meetings and discussions with KWO and Department of Agriculture staffs.

The following comments are offered:

1. **Sustainability of the Equus Beds Aquifer.** The Equus Beds Aquifer is historically and currently a sustainable water resource in terms of quantity. This key characteristic must be maintained both across the whole aquifer and locally within it. The State of Kansas should continue to initiate and support actions that contribute to the local and global sustainability of the Equus Beds Aquifer.

2. **Regional Water Solution.** It is very encouraging to see the shift in the drafting/discussion process to make the vision more inclusive of the many critical water issues in our state. The City supports a basin based or regional level of analysis for the specific conditions and needs of each part of the state so that those conditions and needs can be properly and effectively

accommodated. Statewide solutions may not apply or be received well locally. The State of Kansas should work to identify and then facilitate regional water solutions.

3. **Artificial Recharge Credit Availability for Use in a Drought.** It is becoming clear that the City of Wichita Aquifer Storage and Recovery (ASR) project's highest value is its ability to store water from periods of high precipitation to provide critical supply in times of drought. To be effective in this role, the recharge credits must be available to be used when drought conditions may temporarily drive water level below the levels experienced in 1993. This is especially true further into a fifty year planning period. The State of Kansas should work with the City of Wichita to adjust the bottom elevation for the definition of the volume from which recharge credit water can be produced.

4. **Support Priority of Water Rights.** The priority of water rights must continue to be respected and enforced. In the case of water users in the Equus Beds Aquifer, this must include addressing localized areas of over appropriation in a way that both proactively protects the seniority standing of different types of water rights holders from impairment and allows maximum sustainable economic benefit to be derived from this aquifer.

5. **Protect Water Quality in the Equus Beds Aquifer.** Freshwater aquifers must be preserved by protecting these resources from natural and anthropogenic sources of chloride contamination. In the Equus Beds Aquifer, the primary source of natural chloride contamination is the Arkansas River as it flows downstream from naturally occurring salt deposits. The primary anthropogenic source is referred to as the Burton salt plume. In both cases, opportunities to slow the migration of the chlorides into the freshwater aquifer should be investigated. The results of any new and existing investigations should be used to develop an action plan that includes both mitigation and active remediation as appropriate.

6. **Investigate Raising Conservation Pool Elevations in Federal Reservoirs.** The ability of Kansas reservoirs to supply water and protect against the impact of drought could be enhanced by raising the conservation pool elevation of many of the impoundments. This action must of course be balanced against the flood control mission of these facilities. Improvements in the science of meteorology, the expansion of weather and stream flow measurement networks, and other information and communication technologies since the design of these facility (some over half a century ago) should be examined to see if the flood control function can be safely rebalanced with the water supply function of these reservoirs.

7. **Capitalize on Flexibility of Water Supply.** Some water utilities have multiple sources of supply. There are times when these utilities may have or may be able to create flexibility in which sources to use and which to "rest". Sometimes these decisions can produce a public good to other water users. The State of Kansas should explore ways to incentivize utilities who have or can create the opportunity to operate in a manner that realizes a public benefit to operate in that way.

8. **Maximize Artificial Recharge of Aquifers.** Over the fifty year planning horizon additional artificial recharge projects may be both developed and potentially expanded. The State of Kansas should look for ways to work with artificial recharge project sponsors to maximize the benefits of their projects/facilities.

9. **State Support for Federal Funding.** The State of Kansas should actively support the efforts of any local unit of government as they work to secure federal funding to develop or sustain water supplies that serve customers within the state.

10. **Use of Public Rights-of-Way for Water Projects.** Water utilities must have access to routes to move raw water from sources to treatment facilities and finished water from those facilities to customers. Use of publicly owned rights-of way can speed project development and construction, minimize impact of private property owners, and minimize the cost of the water sold to customers. The State of Kansas should adopt a policy to assist entities who seek to make use of public rights of ways and easements to construct water conveyance systems within the state.

The City of Wichita has invested $5.6 million with the US Geological Survey to develop two computer models of the Equus Beds Aquifer. The first can be used to forecast the impact of water development and management on the amount of water available in the aquifer over time. The second is used to forecast the impact of water development and management on the migration of plumes of chloride contaminated water. These chloride sources impacts both City of Wichita wells and those of other water rights holders in this portion of the Equus Beds Aquifer.

The City plans to spend an additional $7.8 million to enhance the accuracy and functionality of these models. Both can be expanded to cover the entire Equus Beds Aquifer in a very cost effective manner. The existing quantity model supports comments #1, #2, #3, #4, and #7 above. The existing quality model supports comments #3, 5, and #7 above. The State of Kansas should financially support the further development of these models to better understand the impact of management and development decisions on the available quantity and quality of water in the Equus Beds.

Thank you for your time and effort in the development of this vision for the future of water in Kansas. If you have any questions on this comments please feel free to contact me at your convince.

Sincerely,

Alan King

Alan King
Director of Public Works & Utilities Department

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