



Department of Public Works & Utilities

October 4, 2016

Kansas Department of Agriculture
Division of Water Resources
In Care of Mr. David Barfield, Chief Engineer
1320 Research Park Drive
Manhattan, Kansas 66502

RE: Burrton IGUCA Review

Dear Mr. Barfield,

The City of Wichita is aware of, that Pursuant to K.A.R. 5-20-2, the Chief Engineer of the Kansas Department of Agriculture, Division of Water Resources, is reviewing the designation of the Burrton Intensive Groundwater Use Control Area (IGUCA) on October 4, 2016. The City appreciates the opportunity to provide comment as part of the review proceedings. It is the City's understanding that the review hearing will include information on a proposed boundary shift that would bring into the IGUCA, a number of the City's water wells.

The City believes the proposed boundary shift would incorporate existing ASR Phase I water wells into the Burrton IGUCA. These wells currently allow the City to inject excess water withdrawn from the Little Arkansas River via existing side stream storage wells into the EQUUS Beds aquifer. The purpose of injecting water into the Phase I wells is twofold. Resulting recharge credits secure additional supply for the City which will help meet future needs. This will be especially critical in times of severe drought. Additionally, the ASR Phase I wells benefit all of the Burrton IGUCA stakeholders by slowing down the oncoming chloride migration. Therefore, the Phase I wells must be a consideration of the Burrton IGUCA review, especially in terms of a proposed IGUCA boundary shift.

The City of Wichita supports the continuation of the IGUCA as long as the IGUCA does not limit the City's ability to withdraw water from any of its wells, including recharge credits. Further, the City would be a proponent of expanding the IGUCA boundary to include the ASR Phase I wells if the IGUCA guaranteed the City could transfer the point of withdrawal of recharge credits from any of the IGUCA-affected wells to other City wells. The intent here would be to leave more water in the aquifer in the area under intensive groundwater control and withdraw recharge credits strategically, from other wells in order to continue the existing level of protection provided for against chloride migration. Further, this control would allow the City to

proceed with planning the installation of additional recharge wells in the area of concern in order to provide even greater protection against chloride migration. Incorporating the City's Phase I wells into the IGUCA without this guarantee could unnecessarily impose restrictions that do not currently exist. Such restrictions would result in an overall negative effect on the area of intensive groundwater control in that the City would no longer be compelled to inject water in the area of the Phase I wells. To do so would be counterproductive in terms of protecting water quality and would be in direct conflict with the intent of the existing IGUCA.

The City of Wichita formally submits this letter as written comment for the Burrton IGUCA review proceedings. The City looks forward to engagement on continuing efforts in this matter.

Sincerely,



Alan King
Director

Office of the Director

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