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EQUUS BEDS GROUNDWATER MANAGEMENT DISTRICT NO. 2

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April 6, 2018

Alan King, Director of Public Works & Utilities
City of Wichita
455 N. Main, Eighth Floor
Wichita, Kansas 67202-1606

Water Resources
Received

APR 09 2018

KS Dept Of Agriculture

Re: City of Wichita Water Rights and Aquifer Storage and Recovery (ASR) Project

Dear Mr. King:

At the Equus Beds Groundwater Management District No. 2 Board of Directors April 4, 2018, meeting, City of Wichita staff advised the District of recent changes made to the City's water supply strategy and operations as it pertains to the use made of Cheney Reservoir and the Equus Beds Aquifer. City staff advised that the percent use of each source is essentially being switched from predominately Cheney Reservoir surface water to predominately Equus Beds Aquifer groundwater, reversing the approximately two decade long strategy of using surface water, when available, as the primary source of the City's raw water supply. City staff advised that this change was the result of the apparent opposition the City received from stakeholders regarding the City's proposed modifications to the Aquifer Storage and Recovery (ASR) permits, with the proposal being just recently officially submitted by the City to the Division of Water Resources (DWR) on March 12, 2018. City staff advised the District that the City must start depleting the aquifer to make storage space for physical injection of treated surface water into the aquifer so the City can develop recharge credits in the event that the City's proposal for the establishment of Aquifer Maintenance Credits (AMCs) is not approved by the Division of Water Resources.

By approved motion at the April 4, 2018, meeting, the District Board of Directors is not supportive of the City's recent decision to maximize the City's pumping of groundwater from the Equus Beds Aquifer in an attempt to lower the aquifer to create storage space for artificial recharge and the establishment of recharge credits. The District urges the City to continue to be good stewards of the groundwater resource, as the City has been since switching to using more surface water from Cheney Reservoir some 20 plus years ago. As stated in the City's March 12, 2018, ASR permit modification proposal transmittal letter to the Chief Engineer, DWR, the City's increased use of surface water in lieu of groundwater has greatly assisted in the recovery of the aquifer to near 100% full in the vicinity of the Wichita Well Field and has "improved general groundwater availability, groundwater quality, and provide direct benefits to both the City and other groundwater users in the area." The City's recent decision to increase use of groundwater is a departure from the City's long term stewardship of the groundwater resource and threatens to undo the many positive results that have occurred as a result of the City using less groundwater when surface water is available.

Additionally, intentionally lowering of the aquifer for the sole purpose of creating additional recharge credits is counterproductive to the City's ability to withdraw recharge credits during an extended drought, as the lower the water table is at the start of a drought, the faster the aquifer will reach the minimum water level elevation threshold that recharge credits are allowed to be withdrawn from the aquifer. This could not only detrimentally impact the City's water supply during an extended drought, but will also negatively impact other groundwater users in and near the City's well field.

The District Board believes the City's action of increasing their groundwater use is premature and respectfully requests that the City allow the review of the proposed ASR permit modifications to work through the process before making such drastic decisions regarding the City's raw water supply make-up. The District Board of Directors has not yet officially reviewed the City's ASR permit modifications proposal submitted to DWR on March 12, 2018, nor has the required public hearing been conducted yet by DWR.

The District looks forward to continuing to work with the City, DWR, and other stakeholders to determine how the ASR Project can be best operated to meet the City's drought needs, while at the same time protecting the Equus Beds Aquifer and other groundwater users.

Please contact the District staff if you have any questions or need additional information.

Sincerely,
EQUUS BEDS GROUNDWATER
MANAGEMENT DISTRICT NO. 2


Jeff Winter
Board President

JW/TDB

pc: Jeff Longwell, City of Wichita Mayor
Brandon Johnson, City of Wichita Council Member
Pete Meitzner, City of Wichita Council Member
James Clendenin, City of Wichita Council Member
Jeff Blubaugh, City of Wichita Council Member
Bryan Frye, City of Wichita Council Member
Cindy Claycomb, City of Wichita Council Member
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David Barfield, Division of Water Resources
Lane Letourneau, Division of Water Resources
Tracy Streeter, Director, Kansas Water Office
Joseph Pajor, City of Wichita Public Works & Utilities
Brian Meier, Burns & McDonnell
Equus Beds GMD2 Board of Directors
Tom Adrian, Equus Beds GMD2 Attorney