



CITY OF HALSTEAD

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February 10, 2020

Ronda Hutton
Kansas Department of Agriculture
1320 Research Park Drive
Manhattan, KS 66502

To Presiding Officer Owen:

The City of Halstead is submitting these written comments regarding the City of Wichita's Aquifer Storage and Recovery (ASR) Permit modification proposal. The City of Halstead is located in and utilizes the Equus Beds aquifer for its municipal water supply through Public Wholesale Water Supply District #17 (PWWSD 17). To that end, Halstead relies on the Groundwater Management District #2 (GMD 2) Board of Directors and professional staff to properly manage this important asset in a manner that is most in-line with the public interest. Consistent with that reliance, and the City of Halstead supports and agrees with GMD 2's opposition to these proposed changes.

In addition to the expert reports and testimony that GMD 2 has submitted that lay out concerns with the proposed modifications, the City of Halstead has additional concerns regarding how this proposal might negatively affect our own city's municipal water supply for our 2000 residents. While our primary supply comes through PWWSD 17 whose well fields in the Equus Beds are east of the Little Arkansas River, the City of Halstead did retain one well for emergency purposes and supply that is located within the Wichita well field area. Any adverse effect to the Equus Beds as a result of these proposed modifications, such as further migration of chloride plumes, would potentially jeopardize our primary supply and also directly affect our emergency supply and the availability of water for our city's residents, businesses, and industries.

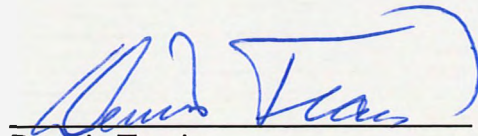
The City of Halstead also stands in opposition because of the negative consequences [potentially impacting the agricultural community surrounding the City. While technically outside of our defined city limits, these people and farms are no doubt a part of the Halstead community and contribute greatly to the local economy, overall vitality, and continued growth and long-term success of the town. If their domestic or irrigation wells were to run dry because of the lowered index levels in drought conditions or worse be contaminated, it could have devastating affects to not only their homes and livelihood, but also the overall community.

The City of Halstead opposes the proposed modifications to the ASR permit conditions because it is granting and expanding additional water rights to the City of Wichita in an area that is known to be fully or over-appropriated. The City of Halstead believes any suggestion of lowering the minimum index levels should be denied as it has been twice before by the State Engineer. The City of Halstead also shares the opinion that the requested permit modifications would not comply with existing Kansas water law and that the proposed Aquifer Maintenance Credits should not be allowed.

The City of Halstead sympathizes with the City of Wichita's duty and responsibility as a local government to provide a safe water supply for the residents they serve, including in times of drought. While Wichita has several options for additional water supply to help them in such scenarios, the City of Halstead is not in such an enviable position - as the Equus Beds aquifer remains our only viable and cost-effective source of water for our residents and the same is true for the larger surrounding agricultural community. The City of Halstead requests that you please keep all of the aforementioned factors in mind when making any decisions concerning the future of our only source of water.

Thank you for allowing and considering our testimony regarding this matter.

Sincerely,



Dennis Travis
Mayor



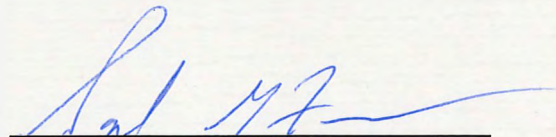
George Torres
City Council President



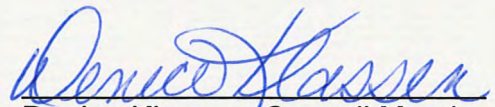
Ed Campbell, Council Member



Mike Wallace, Council Member



Sam Farmer, Council Member



Denice Klassen, Council Member