

Water One

Setting the Standard for
Utility Excellence

Water District No. 1 of Johnson County

April 2, 2015

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REGULATORY BRANCH

RE: WaterOne Comments in Response to Public Notice of Missouri River
Commercial Dredging Permit Renewal Request

Dear Sirs:

On behalf of Water District No. 1 of Johnson County, Kansas, I am submitting comments to the public notice for renewal of commercial sand dredging permits on the Missouri River. WaterOne respectfully asks that because of the widespread impact commercial dredging has on Missouri River stakeholders, that a formal hearing be held on this matter to allow for maximum public input. Furthermore, WaterOne urges the Corps of Engineers to delay the renewal of any commercial dredging permits until after the Missouri River Bed Degradation Feasibility Study is complete.

WaterOne is a public water supply system that serves over 400,000 customers in 17 cities of Johnson County, KS. We have a water intake facility on the Missouri River at mile marker 379 as well as a Collector Well at mile 385. Together these two facilities supply about 50% of the water distributed in our system. In 2004 WaterOne's Missouri River intake was rendered useless due to a combination of river icing and the degradation problem. We were required to spend about \$2.5 million to install low river pumps to pump water up into our intake because the surface level had dropped so significantly. After this event, WaterOne began discussing the degradation issue with the Corps of Engineers.

In 2007, WaterOne joined several other local stakeholders to work with the Corps on what is now known as the Missouri River Bed Degradation Feasibility Study. Millions of dollars have been invested in this cost share study to date. WaterOne alone has invested over \$500,000 and additional thousands of hours of staff time in the Study. Preliminary results of the hydraulic model developed for the Study demonstrate that

commercial sand dredging is a significant contributor to the degradation problem. The effectiveness of alternatives and solutions that have been considered is conditional upon the reduction or complete elimination of commercial dredging. Granted, these results are preliminary and the Corps is going to great lengths to ensure the dredging industry has input in the process. So much so that a schedule waiver is being requested for the Study into 2017 to make sure comments submitted by the commercial dredgers regarding the hydraulic model are considered and incorporated where deemed appropriate.

Again, WaterOne requests and strongly encourages the Corps to hold a formal hearing on this important matter. We believe that dredging permits on the Missouri River should not be renewed at this time and should remain inactive at a minimum until the Degradation Feasibility Study is complete. The sand and gravel needs of the Kansas City area can be met by off river mining. Certainly the dredging industry representatives will not be in favor of moving off the river. For years dredgers have enjoyed a "no cost" place of operation but it has been at the expense of the public infrastructure in the areas they operate. Renewal of the commercial dredging permits at this time will cost the public in the long run in terms of the repair and maintain required to infrastructure if current conditions persist and the threat of total failure of that infrastructure over time.

Best Regards,



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DLM/dlm
Attachments