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October 15, 2021

Kansas Water Office
900 SW Jackson Street, Suite 404
Topeka, KS, 66611-1249

RE: KANSAS WATER PLAN PUBLIC COMMENT

Dear Kansas Water Office Officers and Staff,

Ducks Unlimited (DU) is a nonprofit 501(c)(3), founded in 1937 by sportsmen conservationists. Today, DU represents a broad coalition of nearly 670,000 conservation-minded supporters across the country. As the largest wetlands and waterfowl conservation organization in the world, our mission is to conserve, restore and manage wetlands and associated habitats for North America's waterfowl. DU also recognizes that these wetlands benefit more than 900 species of wildlife and, perhaps most importantly, the people who enjoy and value them. DU has over 15,000 members in Kansas, and a robust conservation delivery program with biologists, engineers, and other conservation professionals working throughout the state.

DU thanks the Kansas Water Office and other state partners for their efforts in developing the 2021 Kansas Water Plan. DU has conserved more than 14.5 million acres of wetland and associated habitat in North American through our public-private partnership model, including over 50,000 acres in Kansas. Our conservation efforts in Kansas are consistent with the guiding principles outlined in the Plan.

Wetlands can play a key role in improving the state's water quality, and reducing vulnerability to extreme events, two of the guiding principles of the Kansas Water Plan. Wetlands and bordering uplands are one of the most effective natural water quality filters when sited, designed, and managed properly. They are especially beneficial in capturing sediments and nutrients such as excess nitrogen and phosphorus as well as other harmful pollutants. Additionally, implementing wetlands projects to address stormwater and combined sewer systems has been shown to save cities hundreds of millions of dollars compared to replacing or expanding traditional treatment facilities. Wetlands also play a vital role in storing and slowly releasing flood waters. Wetlands

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act as sponges, absorbing runoff from snowmelt and rainfall. When floodplain wetlands are in place, floodwaters enter and spread out across wetlands slowing the flow and reducing downstream peaks. Floodwaters are stored in floodplain wetlands until river levels fall and then are slowly released back into the river system. This rise and fall of river systems works well when natural wetlands are in place.

While the Kansas Water Plan briefly acknowledges the importance of wetlands in both water quality and flood control, DU encourages the KWO to elevate the role of this important resource in addressing these critical Kansas water issues. Kansas has lost almost half of its original wetlands - only 435,000 of the state's original 840,000 acres remain. Additional focus on wetland restoration could be a key component to addressing the issues outlined in the Kansas Water Plan.

Conserving and extending the High Plains Aquifer has been a critical component of Ducks Unlimited's efforts in Kansas. The Water Plan acknowledges the potential promise of the impact of playa lakes on aquifer recharge, and DU encourages additional focus on this important resource. Playas are an important source of water for people and wildlife, providing food and rest to migrating waterfowl, cranes and shorebirds. Playas also reduce flooding and erosion damage by collecting and slowing runoff during intense rain events. The clay-lined, shallow wetlands improve the quality of ground water by filtering various pollutants, but they only perform these benefits if they are functioning properly. DU is working with landowners and partners to restore playa lakes by cleaning out excess sediment, restoring natural hydrology, and adding filtering grass buffers that trap sediment. DU has also been involved in outreach and education on the importance of playa lakes by putting on increasingly popular seminars for landowners, workshops, and direct outreach to individual producers. Additional education on this important resource should be included in efforts to increase awareness of Kansas water resources, one of the five guiding principles of the Plan.

The overwhelming majority of Ducks Unlimited's work in Kansas is on privately held land. Kansas ranks 49th in publicly owned land, with only 2 percent of the Sunflower State in public ownership. Ducks Unlimited and the Kansas Department of Wildlife and Parks have a long history of conservation success in land acquisition and wetlands restoration. The wildlife habitat and recreational opportunities provided with those resources can also have a positive impact on the state's water quality and resilience to extreme events.

Robust funding is critical to addressing the issues outlined in the Kansas Water Plan, which acknowledges the State Water Plan Fund's chronic funding deficit. Ducks Unlimited's work with private landowners typically involves voluntary, incentive-based conservation programs which promote agricultural practices that improve soil health, reduce water consumption, and restore wetlands. The role of private landowners in addressing the state's water concerns cannot be overstated. The Water Plan repeatedly references the importance of USDA/NRCS programs such as RCPP, EQIP, WRP, CRP, CREP, and easement programs, all of which are popular with landowners. In addition to being typically oversubscribed and underfunded, many of these programs also require matching funds. Without adequate resources to match grant program

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dollars, Kansas is missing out on millions of dollars a year in potential funding from federal conservation programs. Efforts to address water issues in Kansas will be more impactful if funding is made available to match these significant grant dollars.

Thank you for your consideration of these important issues.

Sincerely,

A handwritten signature in black ink that reads "Matthew Hough". The signature is written in a cursive style and is positioned above the typed name and contact information.

Matthew Hough
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