

November 23, 2011

Brigadier General John R McMahan  
Commander, Northwestern Division  
US Army Corps of Engineers  
PO Box 2870  
Portland, OR 97208-2870

Dear General McMahan,

The state of Kansas offers this letter as input on the draft Missouri River Mainstem System 2011-2012 Annual Operating Plan.

Flood control must be treated as a priority for the 2012 runoff season while our local flood control infrastructure remains vulnerable. Kansas was one of the seven Missouri Basin States that sent a letter August 19 stating there is clear consensus flood control must be the highest priority in the operation of the system. Kansas has also expressed support of the proposal by North Dakota State Engineer Todd Sando to evacuate additional storage in Lake Sakakawea this fall.

While we first welcomed the announcement November 4 that the Corps would be more aggressive and flexible in regards to evacuating water from the system through the remainder of the fall and early winter, it now appears however, that previously announced release schedules and the target of 16.3 MAF of storage has not changed. This is disheartening and unacceptable.

The basin has been experiencing high runoff since 2008 and many levees are still in disrepair. As a result, additional flood storage should be made available this year to mitigate the lack of flood protection in the lower basin. Does the USACE have operational flexibility to vary the flood control storage level to account for a wet cycle?

The AOP included five inflow scenarios simulations using the 1898 – 2006 historical period to derive inflows. Updating the period of record to include the years up to 2011 may catch some of the wet cycle which began in 2008 and would modify the projections.

In addition, the AOP should include a runoff scenario beyond the upper decile, perhaps at the one or two percent level. It is at these highest flow levels where the greatest damages occur.

Improved runoff forecasting is needed and we agree with suggestions to consider additional snow measurements and stream gages as potential means to improve that forecasting.

The Corps also announced on November 4 that direct communication throughout the winter and spring would improve. While daily phone conferences were held throughout the event last

summer and early fall, direct communication with emergency managers and levee operators, as well as state and local officials, needs to improve.

While the River experienced record flooding, 2011 will also be remembered in Kansas for its continued and expanding drought conditions. Even though the northeast corner of our state is not dire currently, drought conditions continue to migrate north and east. Combined with the potential aggravation of channel degradation that may have occurred with the flooding, additional flow may be required in the winter to support intake operations for water and power.

The draft AOP projects full service, full season navigation. In the past, the Corps has made releases from Kansas River tributary reservoirs (Milford, Perry and Tuttle Creek) to meet target navigation flows. The risk to water supply and economic impacts associated with lost recreation outweigh the minimal benefits to navigation supplementation, especially during a time when severe drought is spreading across Kansas. We respectfully request that navigation releases from Perry, Tuttle Creek and Milford be minimized in 2012.

We appreciate the opportunity to comment on the Draft AOP.

Sincerely,

A handwritten signature in black ink that reads "Sam Brownback". The signature is written in a cursive, flowing style.

Sam Brownback  
Governor of Kansas