

Kale Horton
U.S. Army Corps of Engineers
Kansas City Regulatory Office
635 Federal Building
601 East 12th St.
Kansas City MO, 64106

March 7, 2011

Dear U.S. Army Corps of Engineers and KDHE:

Please accept this as my public comment on Permit Number 2003-1759, the permit by Meier's Ready Mix, proposing to dredge the Kansas River from River Mile 90.1 to River Mile 91.6 in Shawnee County. I would also like to go on the record as requesting a public hearing on this permit.

I strongly urge the U.S.A.C.E. to deny this permit, or at the very least to delay its consideration until a major K-State study on the impacts of river dredging is available within the next year. In-river dredging causes extensive environmental damage for no good economic reason, since affordable, high quality sand can be obtained through off-river pit mines. In particular, this section of river was already dredged once by this company, and they had to cease operations because of bed degradation. The riverbed now appears to be degrading again, and it is only a few inches above the level that would require the operation to leave the river once more.

Please consider the high costs of in-river dredging operations:

- It endangers water quality. Dredging stirs up silt that kills mussels and other aquatic life and is expensive to remove from drinking water.
- It increases pollution. Dredging churns up old industrial pollutants - like PCBs and heavy metals - that have settled to the river bottom, and adding to the river's contamination levels.
- It threatens key infrastructure. Dredging damages and destabilizes the river channel and endangers expensive, valuable infrastructure such as bridges, flood control structures, intake pipes for public water supplies, power plants, manufacturing, etc.
- It jeopardizes riparian property rights. The river automatically seeks to fill the holes that dredging creates - and it does so by carving dirt away from the riverbanks, leading to loss of some of our nation's most valuable farmland.
- It causes hazardous conditions for recreational boaters. Dredging cables that attach the rigs to the banks are often hidden underwater, and are dangerous for recreational river users.

Studies have already shown that dredging has caused significant damage to the Kaw's riverbed, to habitat in and along the river, and to water quality. As a result, the U.S.A.C.E. has already closed some stretches of the river to further dredging. Dredging causes these problems because it changes the physical channel of the river. These changes erode the riverbanks, and erosion endangers the riparian ecosystem. Dredging also alters the physical habitat needed by native fishes. Nineteen threatened and endangered fish species have been collected in the Kaw, six since 2006. K-State and the Kansas Department of Wildlife and Parks are funding a major study on dredging impacts due out in late 2011. I urge you to deny this proposed permit, and wait for the results of this study.

Thank you considering my concerns.

Sincerely,
