UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

APR 29 2019

Ms. Jaime Gaggero
Director, Bureau of Water
Kansas Department of Health and Environment
1000 S.W. Jackson, Suite 420
Topeka, Kansas 66612-1368

Dear Ms. Gaggero:

RE: Approval of TMDL document for Smoky-Saline River Basin, Mulberry Creek and Saline River, Kansas.

This letter responds to the submission from the Kansas Department of Health and Environment, originally received by the U.S. Environmental Protection Agency, Region 7 on January 28, 2019, for a Total Maximum Daily Load document which contained TMDLs for total phosphorus. The final approved version was received on April 1, 2019. Mulberry Creek and Saline River were identified on the 2018 Kansas Section 303(d) List as being impaired by total phosphorus. This submission fulfills the Clean Water Act statutory requirement to develop TMDLs for impairments listed on a state's § 303(d) list. The specific impairments (water body segments and causes) are:

Water Body Name	WBID	Cause
Mulberry Cr	KS-1026001019	Total Phosphorus
Mud Cr	KS-1026001029	Total Phosphorus
Mulberry Cr	KS-1026001020	Total Phosphorus
Spring Cr	KS-1026001024	Total Phosphorus
Spring Cr, West	KS-1026001025	Total Phosphorus
Spring Cr	KS-1026001026	Total Phosphorus
Spring Cr	KS-1026001027	Total Phosphorus
Ralston Cr	KS-1026001028	Total Phosphorus
Mulberry Cr	KS-1026001021	Total Phosphorus
Eff Cr	KS-1026001023	Total Phosphorus
Mulberry Cr	KS-1026001022	Total Phosphorus
Table Rock Cr	KS-1026001040	Total Phosphorus
Saline R	KS-102600101	Total Phosphorus
Saline R	KS-102600102	Total Phosphorus
Shaw Cr	KS-1026001041	Total Phosphorus
Saline R	KS-102600103	Total Phosphorus
Owl Cr	KS-1026001039	Total Phosphorus
Table Rock Cr	KS-1026001018	Total Phosphorus

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United States Environmental Protection Agency
Region 7
Total Maximum Daily Load Approval

Mulberry Creek and Saline River
in Kansas

Total Phosphorus

Jeffrey Robichaud
Director
Water, Wetlands and Pesticides Division

4/29/19
Date

The EPA has completed its review of the TMDL document with supporting documentation and information. By this letter, the EPA approves the TMDLs submitted under § 303(d). Enclosed with this letter is Region 7 TMDL Decision Document which summarizes the rationale for the EPA's approval of

the TMDLs. The EPA believes the separate elements of the TMDLs described in the enclosed document adequately address the cause of concern, taking into consideration seasonal variation and a margin of safety.

Although the EPA does not review the monitoring or implementation plans submitted by the state for approval, the EPA acknowledges the state's efforts. The EPA understands that the state may use the monitoring plan to gauge the effectiveness of the TMDL and determine if future revisions are necessary or appropriate to meet applicable water quality standards. The EPA recognizes that technical guidance and support are critical to determining the feasibility of and achieving the goals outlined in these TMDLs. Therefore, the implementation plan in this TMDL document provides information regarding implementation efforts to achieve the loading reductions identified.

The EPA appreciates the thoughtful effort that the KDHE has put into these TMDLs. We will continue to cooperate with and assist, as appropriate, in future efforts by the KDHE, to develop TMDLs. If you have any questions, contact Jennifer Kissel, of my staff, at (913) 551-7982.

Sincerely,

Jeffery Robichaud
Director
Water, Wetlands and Pesticides Division

Enclosure

cc: Mr. Trevor Flynn, Chief, Watershed Planning, Monitoring and Assessment Section, KDHE

EPA Region 7 TMDL Review

TMDL ID: KS-1026001019 **State:** KS
Document Name: Mulberry Creek and Saline River

Basin(s): Smoky Hill-Saline Basin, Lower Saline River Subbasin
HUC(s): 10260010
Water body(ies): Mulberry Creek and Saline River
Tributary(ies): Dry Creek, Spring Creek, Ralston Creek, Eff Creek, Table Rock Creek, Mulberry Creek, Shaw Creek, and Owl Creek.

Cause(s): Total Phosphorus

Submittal Date: Initial: 1/16/19 / Final: 4/1/19 **Approved:** Yes

Submittal Letter and Total Maximum Daily Load Revisions

The state submittal letter indicates final TMDL(s) for specific pollutant(s) and water(s) were adopted by the state and submitted to the EPA for approval under Section 303(d) of the Clean Water Act [40 CFR § 130.7(c)(1)]. Include date submitted letter was received by the EPA, date of receipt of any revisions and the date of original approval if submittal is a revised TMDL document.

The TMDL document was initially submitted by the Kansas Department of Health and Environment to Region 7 of the U.S. Environmental Protection Agency (EPA) on January 16, 2019. Following comments from the EPA, revised TMDL documents were submitted as email attachments on March 21, 2019 and April 1, 2019.

Water Quality Standards Attainment

The targeted pollutant is validated and identified through assessment and data. The water body's loading capacity for the applicable pollutant is identified and the rationale for the method used to establish the cause-and- effect relationship between the numeric target and the identified pollutant sources is described. The TMDL(s) and associated allocations are set at levels adequate to result in attainment of applicable water quality standards [40 CFR § 130.7(c)(1)]. A statement that the WQS will be attained is made.

The target pollutant, total phosphorus (TP), is validated and identified through assessment and data.

Stream chemistry stations (SC) SC640 and SC267 were listed as impaired for TP. The Main Stem Water Quality Limited Segments and Tributaries listed in this document are impaired for the following uses: Expected Aquatic Life, Contact, Domestic Water Supply, Groundwater Recharge, Industrial Waste Water Use and Livestock Watering use.

The TMDL document discusses current concentrations of total phosphorus, which is the parameter for which these waters are currently listed under Section 303(d). The narrative target is developed by applying a median total phosphorus concentration that is shown to support the Kansas Aquatic Life Use Support Index as a Phase I management milestone. The Phase II total phosphorus management milestone targets the 25th percentile of the ecoregional median total phosphorus concentration. This is 35 percent lower than Phase I and also supports the state's Aquatic Life Use Support Index. In addition, the phosphorus management milestones indicate that dissolved oxygen, pH, and sestonic chlorophyll-a will support water quality standards.

Load capacities are based on TP management milestones and the estimated flow condition in the river. Current TP median concentrations are given below in Table 1 (Table 13 in the document).

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Table 1. TP current condition from 1990 through 2017 and Phase I and Phase II TP milestones for Mulberry Creek and Saline River. (Table 13 in the TMDL document.)

Stream Chemistry Station	Current Condition	TMDL Phase I		TMDL Phase II	
	Median TP (mg/L)	TP Milestone (mg/L)	Reduction in TP from Current Condition	TP Milestone (mg/L)	Reduction in TP from Current Condition
Mulberry Creek near Salina (SC640)	0.217	0.200	8%	0.130	40%
Saline River near New Cambria	0.238	0.200	16%	0.130	45%

The ultimate endpoint of this document will be to achieve the Kansas Surface Water Quality Standards by eliminating impairment to uses.

The actual endpoints of this TMDL document will be attaining a Kansas Aquatic Life Use Index score greater than 13, a median sestonic chlorophyll-*a* concentration less than or equal to 10 µg/L, dissolved oxygen concentrations greater than 5.0 mg/L, dissolved oxygen saturation less than 110%, and values within the range of 6.5 – 8.5 for pH. These endpoints apply at all points but are assessed at regular SC stations.

The TMDL document identifies two phases of TP management milestones to successfully attain the designated uses in these waterbodies. The final phased milestone is a median concentration of 0.130 mg/L.

At median flows, the TMDL per day loading capacities (LC) for the stations are given below in Table 2, (in Table 21 and 22 of the TMDL document.)

Table 2. Table of TMDL components at median flow in pounds per day.

Station	Phase I LC (lbs/day)	Phase II LC (lbs/day)
SC640	8.43	5.48
SC267	51.35	33.38

The targets in this TMDL document are established at a level necessary to attain and maintain water quality standards.

Designated Use(s), Applicable Water Quality Standard(s) and Numeric Target(s)

The submittal describes applicable water quality standards, including beneficial uses, applicable numeric and/or narrative criteria, and a numeric target. If the TMDL(s) is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.

The submittal includes the appropriate narrative criteria applicable to nutrients. Table 1 of the TMDL document lists the designated uses by water body. There are 18 water body segments identified in the TMDL document. All have an expected aquatic life use and some type of recreational use. The only segments without the Domestic Water Supply use are: Spring Creek, Ralston Creek, Eff Creek, Owl and Table Rock Creek. The only segments without the Food Procurement use are: Spring Creek, Ralston Creek, Mulberry Creek, Table Rock Creek, and Owl Creek. The only segments without an Industrial Water Use are Spring Creek, Ralston Creek, Eff Creek, Table Rock Creek and Owl Creek.

The TMDL document identifies the impaired uses as Expected Aquatic Life, Contact Recreation and Domestic Water Supply.

The TMDL TP management milestones relate the narrative water quality standards for the introduction of plant nutrients into surface waters (Kansas Administrative Regulations (K.A.R.) 28-16-28e(2)(A), K.A.R. 28-16-

28e(d)(3)(D) and K.A.R. 28-16-28e(d)(7)(A)) and the prohibition of taste and odor producing substances of artificial origin impacting conventional water treatment or that impart an unpalatable flavor to edible aquatic or semi aquatic life or terrestrial wildlife, or that result in noticeable odors in the vicinity of surface waters (K.A.R 28-16-28e(b)(7)).

The document also identifies EPA approved numeric water quality standards for dissolved oxygen and pH. In Kansas' Water Quality Standards at K.A.R. 28-16-28e(e), which states that the dissolved oxygen criterion is 5 mg/L. In Kansas' Water Quality Standards at K.A.R. 28-16-28e Tables of Numeric Criteria, specific numeric criteria for pH is that artificial sources of pollution shall not cause the pH of any surface water outside of a zone of initial dilution to be below 6.5 and above 8.5.

An example TMDL for each monitoring station is given in Tables 21 – 22. The TMDL TP milestones must be met at all points within the waters. The calculations are made at monitoring stations because that is where the data exists to make these calculations. The load duration curve method uses the concentration milestone and flow to calculate a load. As an example, the Phase II TP TMDL (loading capacity (LC), WLA (Waste Load Allocation) for the impaired station (SC640) at the median flow 5.48 (lbs/day);

$$TMDL = (LC) = 5.48 \text{ lbs/day} = 2.21(\sum WLA) + 3.27\ (\sum LA)$$

Pollutant(s) of Concern

A statement that the relationship is either directly related to a numeric water quality standard, or established using surrogates and translations to a narrative WQS is included. An explanation and analytical basis for expressing the TMDL(s) through surrogate measures, or by translating a narrative water quality standard to a numeric target is provided (e.g., parameters such as percent fines and turbidity for sediment impairments, or chlorophyll-a and phosphorus loadings for excess algae). For each identified pollutant, the submittal describes analytical basis for conclusions, allocations and a margin of safety that do not exceed the loading capacity. If the submittal is a revised TMDL document, there are refined relationships linking the load to water quality standard attainment. If there is an increase in the TMDL(s), there is a refined relationship specified to validate that increase (either load allocation or wasteload allocation). This section will compare and validate the change in targeted load between the versions.

There is an established link between the narrative water quality standards and the TP milestones. The TMDL document identifies the 25th percentile of TP medians in the Level III ecoregion in which these water bodies are located as the Phase II milestone.

EPA agrees the milestones as explained will address the narrative and numeric criteria outlined in the TMDL document. Once met the milestones will attain and maintain water quality standards.

Source Analysis

Important assumptions made in developing the TMDL document, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, nonpoint and background sources of pollutants of concern are described, including magnitude and location of the sources. The submittal demonstrates all significant sources have been considered. If this is a revised TMDL document any new sources or removed sources will be specified and explained.

In the absence of a national pollutant discharge elimination system permit, the discharges associated with sources were applied to the load allocation, as opposed to the wasteload allocation for purposes of this TMDL document. The decision to allocate these sources to the LA does not reflect any determination by the EPA as to whether these discharges are, in fact, unpermitted point source discharges within this watershed. In addition, by establishing these TMDL(s) with some sources treated as LAs, the EPA is not determining that these discharges are exempt from NPDES permitting requirements. If sources of the allocated pollutant in this TMDL document are found to be, or become, NPDES-regulated discharges, their loads must be considered as part of the calculated sum of the WLAs in this TMDL document. Any WLA in addition to that allocated here is not available.

The TMDL document identifies both point and nonpoint sources of TP loading.

Point sources are listed in Table 20 in the TMDL document with their current effluent flow (where defined), their current TP concentration in the effluent (where monitored), and their NPDES permit identification and expiration date of their current permit. There are 14 permitted facilities identified. Table 3 below is a summary of the number of each type of NPDES permitted facilities in the watershed.

Table 3. NPDES permitted facilities in watershed.

Type NPDES permitted facility	Number of permitted facilities in watershed
Non-Discharging Lagoon	7
Ready Mix Plant	2
Groundwater Remediation	1
Discharging Lagoon	4

Livestock and waste management systems consist of 32 certified or permitted Animal Feeding Operations (AFOs) or Concentrated Animal Feeding Operations (CAFOs) within the watershed (TMDL Table 15). All CAFO's within the TMDL's watershed are assigned a WLA of zero. Any CAFO that does not obtain an NPDES permit must operate as a no-discharge facility. A discharge from an unpermitted CAFO is a violation of Section 301 of the Clean Water Act. It is the EPA's position that all CAFOs should obtain an NPDES permit because it provides clarity of compliance requirements. This TMDL document does not reflect a determination by the EPA that such facilities do not meet the definition of a CAFO nor that the facility does not need to obtain a permit. To the contrary, a CAFO that discharges has a duty to obtain a permit. If it is determined that any such operation is a CAFO that discharges, any future WLA assigned to the facility must not result in an exceedance of the sum of the WLAs in this TMDL document as approved. Between the CAFOs and nonconfined livestock there are an estimated 31,692 cattle and calves, in addition to other livestock listed in Table 16 in the TMDL document.

On-site waste treatment systems were estimated as having 1,307 septic systems located in this watershed using the Spreadsheet Tool for Estimating Pollutant Loads. These systems have an estimated failure rate of 10 – 15 percent.

Total population in the watershed, according to the 2010 U.S. census, was 19,648 people The watershed is a portion of four counties, one with a projected decrease in population, and three with projected increases in population.

Overall land use consists mostly of grassland (57.8%) and cultivated crops (31.3%).

Contributing runoff from rainfall is expected from some 66% of the watershed at rates in excess 1.285 in/hr. Overall, the watershed has a mean soil permeability of 1.285 in/hr, placing it in the very low permeability category.

Background levels of phosphorus are also located in landscape and in the soil profile. Terrestrial and aquatic biota also contribute to phosphorus loadings.

As submitted, the TMDL document contains a complete listing of all known pollutant sources.

Allocation - Loading Capacity

The submittal identifies appropriate loading capacities, wasteload allocations for point sources and load allocations for nonpoint sources. If no point sources are present, the WLA is stated as zero. If no nonpoint sources are present, the LA is stated as zero [40 CFR § 130.2(i)]. If this is a revised TMDL document the change in loading capacity will be documented in this section. All TMDLs must give a daily number. Establishing TMDL "daily" loads consistent with the U.S. Court of Appeals for the D.C. circuit decision in Friends of the Earth, Inc. v. EPA, et al., No. 05-5015, (April 25, 2006).

The LC is identified at each stream sampling station as part of a load duration curve calculating load based on the median TP concentration and flow at various percentiles of flow exceedance. As loads approach those identified under Phase I, a biological assessment will determine compliance with the narrative nutrient criteria. If one or more of the numeric endpoints are not met at the end of Phase I, Phase II will commence. Analysis has shown that all

goals should be met at Phase II loads (median concentrations).

The LCs are calculated at monitoring stations, but the targeted TP concentrations apply at all points in the segments covered by this TMDL document. The Phase II maximum daily loads at median flow (in pounds per day) are 5.48 lbs/day at SC640, and 33.38 lbs/day at SC267.

The EPA agrees that the LC will attain and maintain water quality standards.

Wasteload Allocation Comment

The submittal lists individual wasteload allocations for each identified point source [40 CFR § 130.2(h)]. If a WLA is not assigned it must be shown that the discharge does not cause or contribute to a water quality standard excursion, the source is contained in a general permit addressed by the TMDL, or extenuating circumstances exist which prevent assignment of individual WLA. Any such exceptions must be explained to a satisfactory degree. If a WLA of zero is assigned to any facility it must be stated as such [40 CFR § 130.2(i)]. If this is a revised TMDL document, any differences between the original TMDL(s) WLA and the revised WLA will be documented in this section.

The WLAs are based on the design flow of each facility and the likelihood of its being a source of TP. For facilities not expected to contribute, their WLAs are set to zero. Through phased targeting, the discharging sources are expected to reduce their effluent concentration to a TP milestone of a median concentration of 0.130 mg/L with additional reductions in loads and phosphorus concentrations accomplished through enhanced implementation of controls on both point and nonpoint sources in the watersheds. A future growth reserve wasteload allocation is also included in these calculations. Multiple Separate Storm Sewer System (MS4) WLAs are calculated using model runoff volume and the applicable phase's TP milestone concentration. The facility by facility WLAs are given in TMDL Table 22 and the sum of the WLAs by monitoring station and flow exceedance are given in TMDL Tables 21 – 22.

Phase II WLA at median flow (pounds/day).

SC Station	WLA	Reserve WLA	MS4
SC640	1.71	-	.5
SC267	1.38	3	.3

Load Allocation Comment

All nonpoint source loads, natural background and potential for future growth are included. If no nonpoint sources are identified, the load allocation must be given as zero [40 CFR § 130.2(g)]. If this is a revised TMDL document, any differences between the original TMDL(s) LA and the revised LA will be documented in this section.

The LAs are based on the remaining loading capacity after the WLAs are considered. Phase II maximum daily LAs at median flow in (lbs per day) are listed in the following table:

SC Station	LA
SC640	3.27
SC267	28.70

To view the full expression of LAs for both phases at a wider range of flow exceedances, see Tables 21 – 22 and Figures 36 – 37.

The load allocation for nonpoint sources is the remaining LC after wasteloads and reserve wasteloads for NPDES discharging permits and MS4 stormwater have been accounted for. Load allocations for each station are presented in TMDL Tables 21 – 22.

The TMDL document has identified all known nonpoint sources of TP in the watershed.

Margin of Safety

The submittal describes explicit and/or implicit margins of safety for each pollutant [40 CFR § 130.7(c)(1)]. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided. If this is a revised TMDL document, any differences in the MOS will be documented in this section.

The Margin of Safety (MOS) for this TMDL document is implicit. This is accounted for in the multiple targets and phased implementation of the targets. The use of multiple targets (five endpoints) constitutes conservative assumptions regarding the effect of TP on all designated uses.

The document shows that the Phase I milestones are compatible with meeting aquatic life use. The Phase II milestones will result in median TP concentrations at levels 45 percent lower than current conditions at SC267 and 40 percent lower than current condition at SC640.

The EPA agrees that the state has provided implicit MOS to support the TMDL.

Seasonal Variation and Critical Conditions

The submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s) [40 CFR § 130.7(c)(1)]. Critical conditions are factors such as flow or temperature which may lead to the excursion of the WQS. If this is a revised TMDL document, any differences in conditions will be documented in this section.

TMDL document accounts for critical conditions and seasonality by examining the effect of temperate and flow on total phosphorus loads and the TMDL targets of Aquatic Life Use Index, dissolved oxygen concentration and saturation, pH and sestonic chlorophyll-*a*. The total phosphorus targets are set to an annual median concentration that will result in the attainment of water quality standards impacted by aquatic productivity which is enhanced above natural levels through the introduction of plant nutrients, total phosphorus.

The EPA agrees that the state considered seasonal variation and critical conditions during the analysis of this TMDL and the setting of the TMDL targets.

Public Participation

The submittal describes required public notice and public comment opportunities and explains how the public comments were considered in the final TMDL(s) [40 CFR § 130.7(c)(1)(ii)].

The public was given opportunity to provide feedback during the TMDL process through website postings and public hearings. The TMDL document was posted on November 29, 2018 for public review and a public hearing was held on December 14, 2018. No comments were received from the public.

EPA agrees that the public has had a meaningful opportunity to comment on the TMDL document.

Monitoring Plan for TMDL(s) Under a Phased Approach

The TMDL identifies a monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of water quality standards, and a schedule for considering revisions to the TMDL(s) (where a phased approach is used) [40 CFR § 130.7]. If this is a revised TMDL document, monitoring to support the revision will be documented in this section. Although the EPA does not approve the monitoring plan submitted by the state, the EPA acknowledges the state's efforts. The EPA understands that the state may use the monitoring plan to gauge the effectiveness of the TMDLs and determine if future revisions are necessary or appropriate to meet applicable water quality standards.

The TMDL document identifies stations SC640 and SC267 for future water quality monitoring for TP and

SC267 for sestonic chlorophyll-*a* monitoring. Biological monitoring is to continue at SB267.

Reasonable Assurance

Reasonable assurance only applies when less stringent wasteload allocation are assigned based on the assumption that nonpoint source reductions in the load allocation will be met [40 CFR § 130.2(i)]. This section can also contain statements made by the state concerning the state's authority to control pollutant loads. States are not required under Section 303(d) of the Clean Water Act to develop TMDL implementation plans and the EPA does not approve or disapprove them. However, this TMDL document provides information regarding how point and nonpoint sources can or should be controlled to ensure implementation efforts achieve the loading reductions identified in this TMDL document. The EPA recognizes that technical guidance and support are critical to determining the feasibility of and achieving the goals outlined in this TMDL document. Therefore, the discussion of reduction efforts relating to point and nonpoint sources can be found in the implementation section of the TMDL document and are briefly described below.

The states have the authority to issue and enforce state operating permits. Inclusion of effluent limits into a state operating permit and requiring that effluent and instream monitoring be reported to the state should provide reasonable assurance that instream water quality standards will be met. Section 301(b)(1)(C) requires that point source permits have effluent limits as stringent as necessary to meet WQS. However, for wasteload allocations to serve that purpose, they must themselves be stringent enough so that (in conjunction with the water body's other loadings) they meet WQS. This generally occurs when the TMDL(s)' combined nonpoint source load allocations and point source WLAs do not exceed the WQS-based loading capacity and there is reasonable assurance that the TMDL(s)' allocations can be achieved. Discussion of reduction efforts relating to nonpoint sources can be found in the implementation section of the TMDL document.

In addition, the TMDL document identifies authorities available to the state to direct the called for reductions.

1. K.S.A. 65-164 and 165 empowers the Secretary of KDHE to regulate the discharge of sewage into the waters of the state.

2. K.S.A. 65-171d empowers the Secretary of KDHE to prevent water pollution and to protect the beneficial uses of the waters of the state through required treatment of sewage and established water quality standards and to require permits by persons having a potential to discharge pollutants into the waters of the state.

3. K.S.A. 2002 Supp. 82a-2001 identifies the classes of recreation use and defines impairment for streams.

4. K.A.R. 28-16-69 through 71 implements water quality protection by KDHE through the establishment and administration of critical water quality management areas on a watershed basis.

5. K.S.A. 2-1915 empowers the State Conservation Commission by KDHE to develop programs to assist the protection, conservation, and management of soil and water resources in the state, including riparian areas.

6. K.S.A. 75-5657 empowers the State Conservation Commission to provide financial assistance for local project work plans developed to control nonpoint source pollution.

7. K.S.A. 82a-901, et. seq. empowers the Kansas Water Office to develop a state water plan directing the protection and maintenance of surface water quality for the waters of the state.

8. K.S.A. 82a-951 creates the State Water Plan Fund to finance the implementation of the *Kansas Water Plan.*

9. The *Kansas Water Plan* provide the guidance to state agencies to coordinate programs intent on protecting water quality and to target those programs to geographic areas of the state for high priority implementation.

The State Water Fund provides $12-13 million annually for implementation of water quality and pollutant

reduction activities.