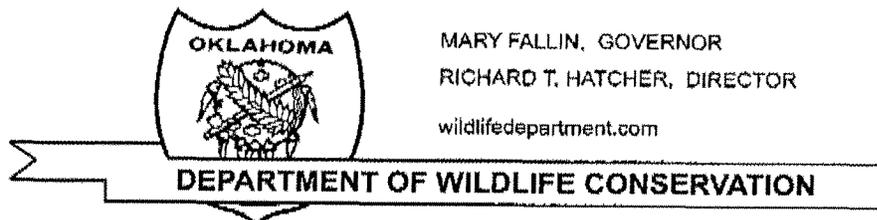


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Oklahoma Water Resources Board  
Attn: Anissa Maher, Paralegal  
3800 North Classen Boulevard  
Oklahoma City, OK 73118

May 11, 2012

Re: Comment for the Order Establishing the Tentative Maximum Annual Yield of the Arbuckle-Simpson Aquifer

Ms. Maher:

This letter is being submitted as part of the Arbuckle-Simpson Maximum Annual Yield hearing process. As the agency responsible for the management of fish and wildlife resources, the Oklahoma Department of Wildlife Conservation (ODWC) is concerned with policy which affects the habitats upon which they depend. The springs and spring-fed creeks of the Arbuckle-Simpson aquifer are unique habitat types that depend extensively on surface expression of groundwater to maintain their species composition and habitat quality. Excessive water use may yield negative impacts to the underlying aquifer and subsequent reduced spring and/or stream flow in dependant drainages. Preferred habitat for headwater species is already limited within these springs and related modeling efforts demonstrate additional habitat loss if flows are reduced (Seilheimer and Fisher 2008).

The Blue River Public Fishing and Hunting Area (BRPFHA) is owned and managed by ODWC and is directly reliant on spring flow originating from the Arbuckle-Simpson aquifer. This area provides angler access to 6.25 miles of stream and over 3,000 acres of prime wildlife habitat. The BRPFHA is one of Oklahoma's most beautiful and picturesque recreation destinations featuring clear flowing water through unique geologic formations and remains one of our most heavily visited locations. The tremendous fishing opportunities and outdoor recreation offered at this site and adjacent drainages are made possible only by continued spring-fed flow. Quality fishing and resource management are totally reliant upon both quantity and quality of water.

ODWC is supportive of policy that will provide reasonable compromise to all water users without diminishing the quality of springs and streams of the Arbuckle-Simpson aquifer. We prefer a lower Maximum Annual Yield (MAY) and Equal Proportionate Share (EPS) that would be more protective of the aquifer and spring and stream flow than what is allowed in the proposed Tentative Order. Model projections from the Oklahoma Water Resources Board (OWRB) show significant reductions to base flow and total flow at the

recommended allocation. However, ODWC cautiously supports the proposed MAY and EPS realizing that it offers more protection than what is currently provided. Due to potential and projected impacts to springs and stream flow, setbacks should be considered when well and other consumptive uses (e.g. mining operations) are proposed in sensitive areas. Additionally, metering and reporting requirements should be considered in the rule making process.

Sincerely,



Barry Bolton  
Chief of Fisheries

Seilheimer, T. S. and W. L. Fisher. Instream Flow Assessment of Springs and Streams Draining the Arbuckle-Simpson Aquifer. Oklahoma Cooperative Fish and Wildlife Research Unit, Stillwater, OK.