

**BEFORE THE OKLAHOMA WATER RESOURCES BOARD
STATE OF OKLAHOMA**

IN THE MATTER of Determining the Maximum)
Annual Yield for the Arbuckle-Simpson)
Groundwater Basin underlying parts of Murray,)
Pontotoc, Johnston, Garvin, Coal and Carter)
Counties)

PROTESTANTS' RESPONSE TO NATIONAL PARK SERVICE BRIEF

Protestants hereby respond to the National Park Service's ("NPS") untitled brief submitting its "preliminary comments on the appropriateness of rulemaking" ("Comment").

The NPS's Comment does not purport to support or oppose the Oklahoma Water Resources Board's ("OWRB") Tentative Determination of Maximum Annual Yield of Groundwater from the Arbuckle-Simpson Basin ("Tentative Determination"). (See Comment at 1, 3, and 5.) The Comment does, however, claim to review and analyze Dr. Eileen Poeter's assessment of the utility of the model presented in OWRB Ex. 1 ("USGS Model") for making the Tentative Determination. The Comment ultimately attempts to draw conclusions about the gravity of Dr. Poeter's assessment by comparing the 5-year average base flows from the USGS model results with the alleged results of the computer simulation ran by Dr. Poeter.¹ (Comment at 3-4.) In doing so the Comment ignores and potentially obscures several of the important aspects of Dr. Poeter's testimony.

First, due to representations by OWRB staff regarding how the Tentative Determination was derived, Dr. Poeter's analysis consciously focuses on the 75% exceedance and not the 5-year average base flow. Second, representing the top layer as unconfined is important because of its

¹ There is nothing in the materials provided which affirmatively demonstrates that Dr. Poeter's simulation resulted in the 5 year average results suggested by the NPS. Therefore, it is outside the record.

influence on the 75% exceedance flow, and Dr. Poeter's simulation demonstrates that the USGS Model's results change dramatically when the unconfined layer is represented. Third, though Dr. Poeter's simulation utilizes more accurate information (for the unconfined zone) than was used in the USGS Model, the primary purpose was to demonstrate the need for a more rigorous review of the USGS Model before any policy decisions are based thereon.

The Comment Ignores The Distinction Between Various Measures Of Stream Flow And Assumes Without Explanation That The 5-Year Average Is A Relevant Measure

The Comment constructs its analysis on the unsubstantiated premise that the critical measure for stream flow is the 5-year average flow. As the Protestants have previously briefed, there are many different ways to measure stream flow, and the record suggests there was much confusion between the various maximum annual yield team members as to which measure was intended to be used and whether or how other measures were converted. (*See* Protestant's Post-Hearing Brief In Opposition to the Arbuckle-Simpson Tentative Maximum Annual Yield/Equal Proportionate Share, 13-16, May 31, 2001.)

The importance of groundwater modeling is premised on the OWRB's belief that the maximum annual yield must "protect water flow that constitutes an essential component of natural habitat of area streams".² (OWRB Ex. 2, Tentative Conclusion 7.5, p. 8.) Toward that end, the Tentative Determination is purportedly based on the Surface Water Technical Advisory Group's ("Advisory Group") recommendation that a reduction in the 75% exceedance flow of no

² Protestants do not concede that the OWRB has correctly determined that the term "natural flow" in 82 O.S. § 1020.9A requires a maximum annual yield that protects fish habitat. As previously briefed, "natural flow" is a flow that allows for reasonable use by people, *Franco-American Charolaise, Ltd. v. OWRB*, 1990 OK 44, 855 P.2d 568, and the Oklahoma Supreme Court has previously held that statute requires the protection of in-basin drinking water supply, *Jacob's Ranch, L.L.C. v. OWRB*, 2006 OK 34, 148 P.3d 842, 854.

more than 25% would adequately protect stream habitat.³ (*Id.* at Tentative Finding 12.a, p. 4); (OWRB Ex. 9 at 4 and 21-22; *see also* Protestants Ex. 13 (stating that the Advisory Group asked Scott Christenson to model the 75% exceedance).) The USGS Model report acknowledges that the 75% exceedance flow assesses the affects of groundwater withdrawals on low flows to which the protected fish habitat is sensitive. (OWRB Ex. 1 at 82.) Nevertheless, The Comment assumes without explanation that the 5-year average flow is the appropriate measure of concern and fails to even note that this was not the flow regime that the Advisory Group asked to be modeled. (*See* Comment at 3-6.)

The NPS's failure to mention the distinction between the average flow and the 75% exceedance flow is particularly problematic when analyzing Dr. Poeter's assessment. It is impossible to read even a single page of Dr. Poeter's analysis without being confronted with the fact that she specifically focused on the 75% exceedance, and not the 5-year average flow, because this was the flow regime which the Advisory Group asked to be modeled. Indeed the first three sentences of the Introduction to Dr. Poeter's report specifically note that

“The report provides information on long-term average stream flow depletion and 75 percent exceedance (25th percentile) of stream flow in response to groundwater withdrawals distributed as

³ Protestants do not concede that the numerical maximum annual yield and equal proportionate share in the Tentative Determination are in fact based on the Advisory Group's recommendation. The record shows that the OWRB Staff based those determinations on the 5-year average flow, (*See* OWRB Ex. 4 at 12-13 (misstating that the Advisory Group “deemed a reduction in the 5-year avg. base flow by no more than 25% as acceptable limit” and providing 5-year average model results from OWRB Ex. 1, Table 22, p. 83.) As discussed herein, the Advisory Group's recommendation was not based on the 5-year average, but rather on the 75% exceedance flow. Even if the Tentative Determination had followed the Advisory Group's recommendation, the Advisory Group had no basis for the recommendation that it made. Protestants do not concede that the Advisory Group had any basis for the recommendation it made. The record shows that the Advisory Group based its determination of the acceptable impact on stream habitat using the Baseline Low Flow regime studied by the Instream Flow Assessment, (*See* OWRB Ex. 3 at 15 and 27-30), and there is no evidence as to how the expected impact under that regime can be converted to the 75% exceedance flow.

an equal proportionate share. The 75 percent exceedance of stream flow is deemed to be important because 'aquatic habitat and aesthetic beauty of the springs and streams of the eastern Arbuckle-Simpson aquifer are sensitive to low flows'.

"As expected, the percent depletions of long-term average stream flow can be approximated by subtracting the annual volume of groundwater withdrawn in a model simulation from the annual volume of stream flow and dividing the stream flow before subtracting the withdrawn volume."

Protestants Ex. 11 at 2. In fact, Dr. Poeter pointed out that, if low flows and their impact upon fish habitat were not the critical concern, there was really no need to perform any modeling in the first place (Protestant Ex. 10 at 1). Modeling, and the unconfined layer in the aquifer are important, as Dr. Poeter noted, "BECAUSE LOW FLOW MATTERS TO FISH HABITAT". (*Id.*) In short, Dr. Poeter purposefully focused her analysis on the 75% exceedance flow because (1) this was the flow regime which the Advisory Group requested be modeled to protect aquatic habitat that is sensitive to low variable flows and (2) average stream flow is easily estimable in a way that largely renders the entire exercise of computer modeling unnecessary. Therefore, it is meaningless to discuss Dr. Poeter's work using the 5-year average flow as the NPS has attempted to do.

The Model's Failure To Represent The Unconfined Layer Is Concerning Because Of Its Influence On The 75% Exceedance Flow, Which Is What Dr. Poeter's Simulation Demonstrated

The NPS Comment characterizes Dr. Poeter's primary concern as "the manner in which storage coefficient (S) was assigned in the transient USGS Model" so as to ignore the unconfined portion of the aquifer. (Comment at 3.) The Comment neglects to mention that representing the unconfined layer is important because of the buffering effect the unconfined layer has on the low flows that are critical to fish habitat. (*See* Protestants Ex. 10 at 1 and 11.) Again, when the Comment states that "Dr. Poeter used the USGS model to determine the influence of a higher S

on stream flow depletions due to groundwater withdrawals,” (Comment at 3), it fails to explain that she was concerned with the model’s utility for evaluating the low flows as reflected by the 75% exceedance flow regime. (Protestants Ex. 10 at 1 and 13; Protestants 11 at 3 and 8.) Thus, when the Comment compares the USGS Model with the results of Dr. Poeter’s simulation by looking at 5-year average flow, it suggests that fully correcting for Dr. Poeter’s concerns inconsequentially changes the result by less than 50%. (Comment at 4 (17.3 cfs with unconfined layer versus 11.6 cfs without it).)

In reality, Dr. Poeter was never concerned by the potential impact of representing the unconfined layer on 5-year average flow. She was focused solely on the 75% exceedance flow as identified by the Advisory Group. She even began her presentation at the hearing by explicitly noting that including the unconfined layer should have little, if any, affect on the modeled 5-year average flow. (Protestants Ex. 10 at 1.) Rather, she was concerned about the potential influence that including the unconfined layer could have on the 75% exceedance flow, and her simulation demonstrated exactly why. (*Id.* at 1 and 13; Protestants 11 at 3 and 8.) Without the unconfined layer, the simulation produced a 75% exceedance flow of just 2.5 cfs. (Protestants Ex. 10 at 1 and 13 .) When the simulation included the unconfined layer, it produced a 75% exceedance flow of 13.2 cfs. (*Id.*) Thus, by the measure that the Advisory Group sought to have modeled and that Dr. Poeter evaluated, the simulation demonstrates that representing the unconfined layer in the model can change the result by approximately 500%, an amount that is consequential.

Dr. Poeter's Simulation Demonstrates The Shortcomings In The USGS Model For Making Policy Decisions

Perhaps more problematic than simply understating the influence of representing the unconfined layer in the model, the NPS Comment seems to suggest that Dr. Poeter’s simulation

provides useful information which supports the Tentative Determination. The Comment concludes that though Dr. Poeter's simulation produced a higher 5-year average flow than the USGS Model, "the value still represents an unacceptable depletion in base flow of 72%". (Comment at 4.) Apart from improperly referring to 5-year average flows rather than the 75% exceedance flow, this suggests that Dr. Poeter's simulation somehow supports the Tentative Determination. It does not.

Dr. Poeter set out to evaluate the utility of the USGS Model for making policy decisions. (See Protestants Ex. 11 at 2.) During her evaluation of the model she noted that "one value of specific storage was applied to the entire model domain and the sensitivity of model results to the value of specific storage was not assessed." (*Id.* at 3.) She concluded that "the sensitivity of the 75 percent exceedance of stream flow to different values and distributions of storage coefficients needs to be evaluated." (*Id.*) The simulation was an initial test of the sensitivity of the 75 percent exceedance. Thus, during Dr. Poeter's presentation at the hearing, the slide providing the model results is immediately followed by a conspicuous disclaimer that the simulation does not provide information on the expected flow of the aquifer. (Protestants Ex. 10 at 13-14.) The simulation simply demonstrates that storage coefficient has a substantial influence on the model's results. Because it is likely the uniform storage coefficient used by the USGS Model "is not representative of the system and spatial variation has not been assessed", the model is not presently useful for making policy decisions. (Protestants Ex. 11 at 3.) Rather there must first be a "more rigorous analysis of the storage coefficient including: a) evaluation of its special distribution in the regional analyses; and b) aquifer tests of sufficient duration to evaluate storage coefficient at a number of locations in the study area." (*Id.* at 8.)

CONCLUSION

The NPS's Comment does not claim to support the Tentative Determination, but its flawed analysis of Dr. Poeter's assessment of the USGS Model potentially obscures and minimizes the gravity of the problems she identified. The critical flow to be modeled according to the Advisory Group was the 75% exceedance (even though the fish habitat study was correlated to Baseline Low Flow - not the 75% exceedance flow). The 75% exceedance flow is substantially influenced by the storage coefficient. Thus, the failure to accurately measure and incorporate the correct storage coefficient for the unconfined zone renders the USGS Model not helpful or useful for making important policy decisions.

Dated this 14th day June, 2012.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of June, 2012, he emailed a copy of the above and foregoing Protestants' Response to National Park Service Brief to the email addresses shown on Exhibit A, attached hereto and made a part hereof. The undersigned further certifies that on the 14th day of June, 2012, he mailed a copy of said Protestants' Response to National Park Service Brief to the parties named on Exhibit B, attached hereto and made a part hereof.


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