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The Sierra Club Perspective on Oklahoma's Water Resources

Oklahoma's water resources may be adequate to provide for the needs of Oklahoma citizens now and in the future, but only if these resources are managed properly. The Oklahoma Sierra Club wants to ensure that water quality, as well as quantity, is adequate to support all designated beneficial uses. Public and private water supplies, recreation, plants, fish and wildlife, municipalities, industrial uses, irrigation and aesthetics all benefit from clean water protections.

Our water resources must be protected for future generations, for the ecological sustainability of watersheds and for the public right to sufficient quantities of affordable, clean drinking water. Furthermore public access to clean drinking water should be recognized as a basic human right that should not be abridged by privatization of water supply systems.

In years past, the public concern was to protect access to rivers for navigation and fishing. To protect these rights, navigable waterways and shorelines were held in the public trust. Today the public right to sufficient quantities of clean water must be given equal stature.

The Oklahoma Sierra Club supports and promotes the development of a new comprehensive water plan based on sound scientific principles and comprehensive data collection.

Oklahoma's current water plan -

- fails to protect beneficial uses other than for drinking water (such as fish and wildlife),
- fails to adequately reserve water sufficient to meet all present beneficial uses and preserve water quality,
- fails to adequately address groundwater or the interaction between surface water and groundwater resources
- and fails to provide for future generations.



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Work must begin immediately on a new comprehensive water plan for Oklahoma which will -

- address the intimate interconnections between surface water and groundwater
- replace the concept of depletion schedules with sustainable usage rates
- protect ALL beneficial uses
- provide a new definition of excess water that
 - guarantees minimum water reserves to meet all present and future beneficial uses,
 - [guarantees minimum in stream flows]
 - preserves water quality
 - provides for future generations
- recognize public access to clean drinking water as a basic human right that should not be abridged by privatization of water supply systems.
- involve public participation in all phases of the process.

Until a new comprehensive water plan is completed there are many things that can be done now.

- Existing Oklahoma Water Quality Standards must be utilized and enforced by all state environmental agencies within their areas of jurisdiction as directed in existing statutes.
- State agencies must develop and enforce detailed water quality implementation plans and procedures as is already required by Oklahoma law. These agencies include the Department of Agriculture, the Department of Environmental Quality, the Oklahoma Water Resources Board, the Department of Mines, the Department of Wildlife Conservation, the Conservation Commission and the Corporation Commission. Such plans must include how water use permit applications will be reviewed to ensure compliance with water quality standards.



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- Moratoriums should be placed on large interbasin transfers of water until adequate protections are established.
- Moratoriums should also be placed on any new permits for CAFOs (Confined Animal Feeding Operations), LMFOs (Licensed Managed Feeding Operations) and any large animal feeding operation.
- Require permits for all poultry operations regardless of method of litter management and restrict locations of houses, lagoons and numbers of animals allowed.
- Discharge permits should not be issued unless it can be proven that no harm to water resources will occur.
- Streams should not be removed from the 303d list of impaired streams unless all water quality standards, including anti-degradation standards, are met.
- Federal agencies such as the Corps of Engineers must also comply with Oklahoma Water Quality Standards when issuing permits for dredge and fill activities, hydropower operation and other federally regulated activities.

Finally, the public must be educated about the need for water conservation. Sound water use practices reduce the amount of stress that is placed on our existing water resources, both by limiting water withdrawals and by decreasing wastewater discharges. Conserving water reduces wear and tear on major infrastructure such as water and wastewater treatment plants and the distribution systems that deliver water to consumers, and can postpone or eliminate the need for making major investments in new infrastructure.