
From: Peppersack, Jeff
Sent: Monday, January 28, 2013 10:18 AM
To: 'Charles G. Brockway'
Cc: 'Donna Kelsey'; 'Ed Lawson'; 'Fritz Haemerle'; 'Charles E. Brockway'; Spackman, Gary; Baxter, Garrick
Subject: RE: 37-8502 mitigation

Chuck,

I was out of the office Thursday and most of Friday, so I was not likely available if you tried to call. I've briefly reviewed the revised mitigation plan.

During our meeting a couple of weeks ago, we discussed the possibility that the recent decree for Clarendon Reservoir provided validity to the reservoir volume up to 102 acre-feet, even if the full 102 acre-feet was not timely developed after the transfer in 2003. After review, the Department agreed that some portion of the 102 acre-feet might be used as mitigation (my letter dated January 17, 2013). To finalize the plan, I requested further information including foregone storage volume with calculations showing surface area and evaporation used to determine foregone storage.

Your revised mitigation plan is based on credit for reductions in the historic capacity of Clarendon Reservoir, above and beyond the 102 acre-feet provided in the transfer and recent decree. That was not the concept discussed at our meeting or agreed to in my January 17, 2013 letter. An acceptable plan will need to offer a reduction in volume from the 102 acre-feet with associated surface area to document evaporation associated with the volume reduction. As a starting point, my letter of January 5, 2011 provided discussion regarding a stipulated size of 13.13 acres (from protest agreement) and a developed size of 11.8 acres, leaving a balance of 1.33 acres that could be used to determine an evaporative amount for mitigation.

We also discussed the use of site-specific weather data to "correct" long-term weather data available from the Hailey station to estimate evaporation. The Department previously authorized additional time for you to collect site-specific weather data with the understanding that short-term data would not be ideal, but might be acceptable. Your revised mitigation plan suggests that no significant correlation exists for wind speed between the two stations. You proposed using the single-year record of wind speed to estimate evaporation at the place of use.

As we've discussed, a single-year record of wind speed is not appropriate to calculate the evaporation. Visual observation of your attached scatterplot of wind speed between the two stations suggests there is a correlation. Although the correlation is not ideal, as expected, it would be more appropriate to estimate evaporation based on the relationship developed between the site-specific data to the long-term record at the Hailey station.

I'd be happy to discuss further as needed.

Jeff