

Wylie, Allan

From: bcontor.rm@gmail.com on behalf of Bryce Contor
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Sent: Thursday, November 01, 2012 8:25 PM
To: Wylie, Allan
Cc: Blew, David; Chuck Brockway; chuck.brendecke; Dave Colvin; David Hoekema; David Kampwerth; Greg Sullivan; Gregg S. Ten Eyck; Hal Anderson; J. D. May; Jack Harrison; Janak Timilsena; Jeff Sondrup; Jennifer Johnson; Jim Bartolino; Jim Brannon; John Koreny; John Lindgren; Johnson, Gary; Jon Bowling; Ken Skinner; Linda Lemmon
Subject: Uncertainty report

Allan -

I realize the report is final and that I am delinquent in my single comment:

On page 9 the report states

"It is only after the impact differences (range) becomes large, say 0.10 or greater, that the uncertainty becomes a practical issue."

The practical effect of a difference in modeled results depends entirely upon the administrative question to which the model is applied. My understanding from both Jeff Peppersack and Shelley Keen is that there is no de minimus consideration for mitigation requirements for new water rights. Our experience has been that sometimes large mitigation events are required to satisfy very small modeled requirements. Even with groundwater transfers, when the modeled effects are just barely over the de minimus threshold, it often requires mitigation of many tens of acre feet per trimester to satisfy single-digit modeled impacts. While doubling a single-digit effect seems trivial, the resultant doubling of a large mitigation effort may not be trivial.

I apologize for not getting this to you sooner.

Bryce

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