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- The period from 1880-1889 has no data at any gage. Data for Near Roosevelt & Chrysotile doesn't begin until 1913 and 1924, respectively.
- The period from 1908-1913 has no data at any gage. Therefore, Mr. Burtell is missing data for ~15% of his reconstruction period.
- While the period from 1880 – 1940 may balance out close to the median as he states, the periods of data for which there is actual data (1889-1908, 1913-1940) are decidedly below median, according to the tree-ring data on which he relies, as shown in Figure 7 below. Therefore, his calculations based on these data will be low.

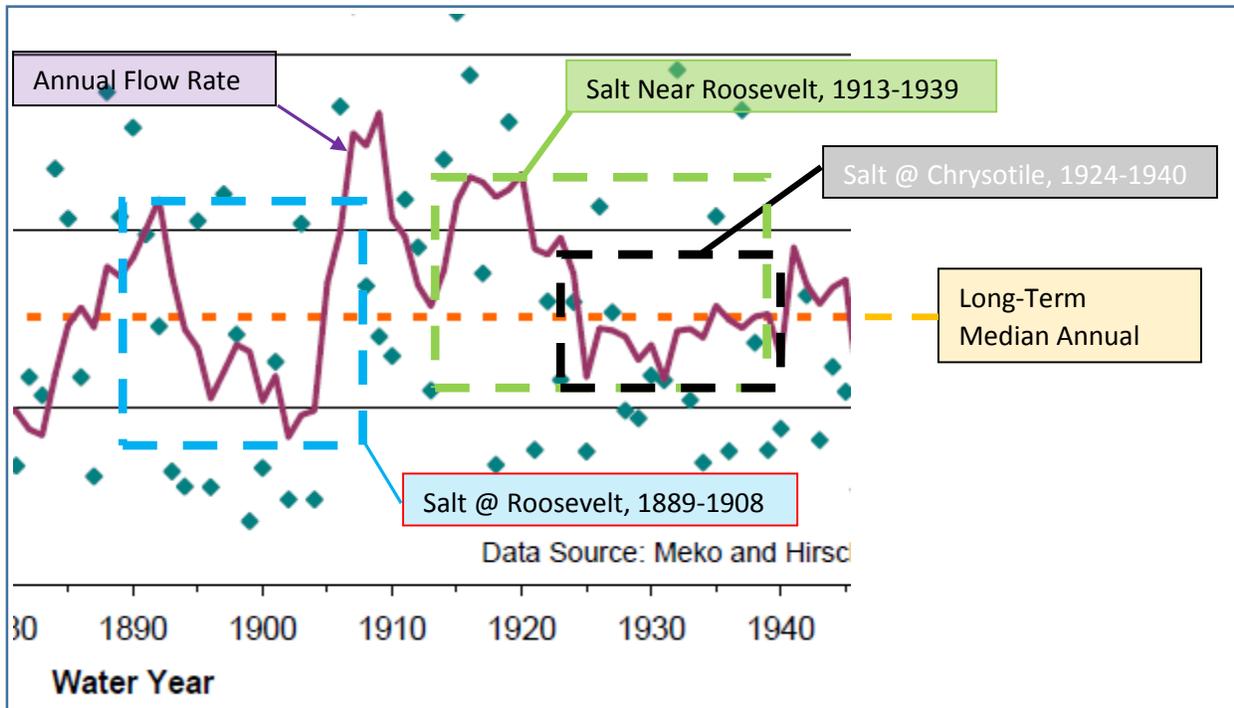


Figure 7. Period of records for Burtell's flow reconstructions, clipped from Burtell Figure 8 and annotated to show the actual periods of record for the gage data used compared to the stated reconstruction period of 1880's to 1940. The data used by Burtell are generally from below median years, and not thus representative of the long-term flow of the Salt River.

- Mr. Burtell makes no recognition of seasonal fluctuations in flow, and no consideration of the differences between the winter/spring high flow season and the low flow periods of the year.
- Mr. Burtell repeatedly stated that he believed his flow reconstruction was conservative and resulted in reconstructed flow rate estimates that were probably higher than reality. Some aspects of his analysis indicate that his reconstruction may in fact be less conservative than he claimed.
 - As shown in Figure 7 above, the period of record he chose was dominated by below-average flow years.
 - Mr. Burtell attempted to verify his estimates by making a comparison to a long-term flow estimate made by the US Bureau of Reclamation (1952). According to his testimony, his verification was based on the relative values of his estimate of the 25% flow (918 cfs) to the USBR's (1952) estimate of the average flow (710 cfs).