



10/19/10

James F. Crew
Manager, Hydro Services
Alabama Power Company
600 North 18th Street
Birmingham, Alabama 35291

Subject: Comments on October 13th meeting and Multi-Criteria Decision Analysis

Jim:

We appreciate the opportunity to evaluate operational alternatives at the Martin Project using the multi-criteria decision analysis (MCDA) method. The purpose of an MCDA is to aid multiple stakeholders in the evaluation and selection of a preferred course of action among numerous alternatives based on multiple criteria. Two goals of the Martin MCDA are to consider variable criteria weights based on stakeholder preference in order to “develop an objective and defensible basis for selecting 2 or 3 preferred alternatives that will be further evaluated with respect to potential protection, mitigation and enhancement measures.”

After completing several different runs on the model that was provided to stakeholders at the October 13th meeting, American Rivers is concerned that results from the model do not and will not regardless of input, accurately reflect stakeholders preferences. For example; if one runs the MCDA model ranking all major criteria the same across all stakeholder groups (it makes no difference whether the preferences reflect the interests of lake groups, downstream stakeholders, or federal and state agencies), the results are the same. Each model run points to the same 5-6 alternatives as the highest average alternative score. Although these alternatives, 2-6, correspond with APC's top preferences, they do not reflect the interests of the broader stakeholder groups.

This problem could be addressed in part by allowing stakeholders to rank minor-criteria within the major criteria categories. The major-criteria categories are too broad to be used directly in evaluating alternatives. For example, stakeholders interested in lake resources may be more interested in maximizing sub-criteria “recreation” and “lake property values” rather than minimizing “erosion” and “aquatic vegetation”. These sub-criteria's effectively cancel each other out. The same holds true for sub-criteria within major- criteria categories; downstream resources and reservoir management. By ranking sub-criteria, stakeholders will be able to gain a better understanding of preference rankings between the 24 alternatives rather than an importance ranking among major criteria.

At the October 13th meeting, consultants with Kleinschmidt Associates indicated that the model is capable of ranking minor-criteria as well as major-criteria and that stakeholders would be able to do so at the October 26th meeting. In order to develop an objective and defensible basis for selecting 2-3 preferred alternatives for the Martin PLP, it will be critical for all stakeholders to have the opportunity to rank minor-criteria as well as explore other opportunities to examine operational alternatives that best achieve a balance between all stakeholder interests.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Rice", followed by a long horizontal line extending to the right.

Matt Rice
American Rivers
mrice@americanrivers.org

Cc: FERC

Document Content(s)

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