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April 7, 2011

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, Dc 20426

**RE: COMMENT - Preliminary License Proposal for Martin Project (FERC No. 349-150)**

Dear Secretary Bose:

Thank you for the opportunity to comment on the Preliminary License Proposal (PLP) for Lake Martin prepared by Alabama Power. After nearly 4 years of participating as a stakeholder in this relicensing process, to include serving on the Water Quality Panel, and as co-director of the nutrient water quality study, I must say that I am disappointed with the content of the PLP and Alabama Power's decision to exclude from further consideration any changes to the rule curve and associated operating guideline to extend the duration of the summer pool level.

It appears that a flawed and seriously biased decision tool was substituted for good judgment in the final stages of the decision process for the selection of the PLP's proposed action alternatives. In my view, the Multi-Criteria Decision Analysis (MCDA) process described in Section 2.2.1 of the PLP failed to give due and proportionate consideration to the Lake's resource values—especially the recreation and related socio-economic benefit impacts associated with the retention of available water longer into September and October. Likewise, the decision analysis gave unjustifiable weight to the potential environmental impacts of erosion and nuisance aquatic vegetation associated with extending the duration of the summer pool level.

Sources of bias, both computational and cognitive, that permeate the MCDA's specification stem from:

- **Disproportionate, inaccurate and inconsistent scoring of criteria input**
- **Criteria weighting and grouping inequities (grouping of maximize versus minimize sub-criteria for major criteria except for generation/energy)**
- **Presumption of sub-criteria equivalence in impact value**
- **Presumption of equivalent outcome probability**
- **Under-represented socioeconomic impact input**

These sources of bias demand attention and reconsideration before the final Martin license proposal is submitted.

The 'all or nothing' decision regarding any possible guideline changes over the studied 6-week (45-day) 'Fall Extension' period does not reflect sound judgment. Furthermore, Alabama Power's intention, as stated in PLP Section 2.2.2.1, to analyze ways to retain available water longer into October each year as an additional measure to protect, maintain or enhance Lake Martin (as requested by the Lake Martin Resource Association, LMRA) seems to suggest that guideline changes might be prudent in conjunction with (not necessarily in lieu of) any PME measure Alabama Power may offer in their final license proposal.

Consequently, I believe Alabama Power should consider appropriate modifications to the existing flood control and operating guidelines for any part of this 'fall extension' timeframe. There is sufficient rationale to maintain the Martin flood control guideline elevation of 491'(msl) through at least the end of September in addition to a 3 or 4 foot higher winter pool level as described as Alternatives 3 and 4 in the PLP. Additionally, a commensurate adjustment should be made to the operating guideline to maintain the duration of the summer pool at an elevation above 490'(msl) until 31 August and above 488'(msl) by 15 October with available water.

Additional information is available upon request regarding either the MCDA shortcomings or proposed rule curve and operating guideline adjustments.

Sincerely,

*John A. Glasier*

John A. Glasier  
Lake Martin Stakeholder

C/c:

J. Crew, Alabama Power  
C. Borden, LMRA  
J. Cunningham, Lake Martin HOBO's  
R. Bronson, Lake Watch of Lake Martin