

From: Grant Davids [Grant@de-water.com]
Sent: Wednesday, September 07, 2011 1:47 PM
To: Greg Young; Stephen.Hatchett@CH2M.com; Alemi, Manucher
Subject: Comments on Draft Table of Efficiency Quantification

PS—please forward to Fethi; I did not have his email address handy.

Grant

Gentlemen:

I do not have sufficient time to provide detailed comments on the draft tables but offer the following thoughts for your consideration.

1. (As already mentioned), organize the indicators according to purpose (already mentioned). In my thinking there are two basic purposes: One is to assess the potential for real water savings; the other is to assess the potential to re-route flow through a hydrologic system (for all kinds of reasons...water quality, environmental enhancement, etc.). Part of the purpose framework should be a distinction of between recoverable and irrecoverable flow systems, and which indicators apply to each. (In recoverable flow systems, real water savings indicators are not meaningful.)
2. Related to Comment 1, I feel this purpose-based structure should be reflected in the tables themselves and not buried in text in a report as most readers will view the tables only.
3. Differentiate between indicators that are purely physical (e.g., CUF, DU) and ones that involve value judgments (most others). For example, judgment is involved with defining “required” in the term “additional AW *required* for other agronomic uses.” As a minimum, it should be acknowledged that judgment is involved in defining some terms. The next step would be to develop guidelines for making judgments, but that could be a black hole.
4. Stemming from the comment above, I have been thinking that purely physical indicators should be offered as primary indicators. Because they do not involve judgment, they should be comparable across different settings and analyses (neglecting differences in ET, effective precip, etc. estimating methodologies), which makes them inherently more useful. As soon as you are dealing with judgment-based indicators you risk problems of apples and oranges, not to mention different values. I think it might be possible to dispense with value-based indicators entirely and instead offer an analytic framework that relies on the physical indicators along with techniques for identifying and evaluating tradeoffs among discretionary options for re-routing flows. In other words, rather than bury judgments in the indicators, develop a methodology that explicitly relies on judgment.
5. Consider taking a shot at developing the “plan for implementation” required by the legislation. I am certain that there are many different, divergent views around the table regarding how the methodology could and should be implemented, and that’s where a lot of the push-pull is coming from.

Finally, I have not seen Steve's paper on economic efficiency (EE) that Manucher said would be circulated. Obviously the concept of EE involves deep philosophical issues, which I feel will drag the process down if allowed into the methodology. My suggestion is stay the course identified early on, which is to discuss EE but to set it aside due to the numerous issues involved.

Grant

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