Paula Wilson

From: Lawrence Bennett [l.j.bennett.engineering@gmail.com]
Sent: Monday, May 16, 2011 9:11 AM
To: Paula Wilson
Cc: ROBBIN FINCH; Michael Fuss; Greg Pearce; Herrick, Jon; Greg Lanning; Lawrence Bennett
Subject: Comments on draft Anti-degradation Implementation Procedures Section 5

Hi,

I have been trying to understand the SEJ portion of Section 5 as it would pertains to POTWs. Let me pose a scenario for discussion.

The consultant completes the Alternative Analysis in accordance with paragraph 5.3 and has four alternatives.

1. Do nothing will cost nothing but will cause significant degradation.
2. Meets anti-deg rules but the cost is $30 million
3. Causes some degradation at cost of $10 million.
4. Causes slightly more degradation than Alt. 3 but costs $9.5 million.

Based on the alternative analysis, Alternative 3 is selected as the preferred alternative. It will cause some degradation of the water body but it meets the cost analysis portion of the AA.

Moving to the SEJ in paragraph 5.4, in the lead paragraph, there is a statement that a project must be either socially or economically justified, but not both. After the information that is quoted from the rule, there is discussion that POTW's and transportation projects may be considered socially justified; also, in the third last paragraph, of section 5.4, there is a statement that POTW's may be determined to be *a priori* socially important. **Since this discussion is about a POTW, is there anything more that has to be done under the SEJ than just stating that it is a POTW and therefore it is socially justified?**

Thanks.

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Lawrence J. Bennett, P.E.
Bennett Engineering
348 Provident Drive
Boise, ID 83706
208-343-2466
e-mail: L.J.Bennett.Engineering@gmail.com