



## KILGORE CONSULTING AND MANAGEMENT

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Council on Environmental Quality

Re: Proposed National Objectives, Principles and Standards for Water and Related Resources Implementation Studies.

To whom it may concern:

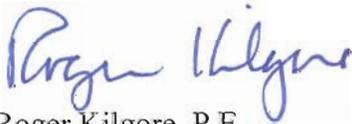
I appreciate the opportunity to comment on the above-referenced proposed document. As a water resources engineer, the intelligent and thoughtful development of water resources is of great importance to me.

Overall, I thought the document was reasonably laid out. Following are my comments and suggestions:

1. On line 39 of the unnumbered page describing the “National Objectives” the document states that the “National Objective is to develop water resources projects based on sound science that maximize net national economic, environmental, and social benefits.” In my experience, maximizing “net” benefits favors larger, more costly projects. I suggest that in addition to net benefits, return on public investment be considered equally. For example, a \$10 million project may yield \$13 million in benefits for a net benefit of \$3 million. Alternatively, a \$50 million project may yield \$55 million in benefits for a \$5 million net benefit. Although the latter has higher net benefits, the former has a higher rate of return and allows investment in other projects with higher rates of return.
2. Ecosystem Services (page 5, lines 25-33). The distinction between ecosystem “services” and “functions” is confusing. It states that a “function” has a value whether or not “humans recognize the benefits.” If humans do not recognize the benefit to themselves or to the environment, but they have value, aren’t they simply ecosystem services that have not yet been recognized?
3. Data (page 9, line 26). The 5-yr limit on data is arbitrary. Given the caveats that follow regarding the validity of data (any data), this limit is counterproductive.
4. Level of detail (page 9, line 44). The text states that the level of detail ... may vary, but shall not be greater than needed to inform the decision...” This sentence should say that the level of detail “shall not be *less* than needed to inform the decision” or be struck in favor of the following sentence which says the detail should be “commensurate” with the potential decision.

5. Climate change (page 9, lines 34-35). Variations in the spatial and temporal changes in temperature are also important as they affect water demands, particularly for irrigation.
6. Environmental justice (page 12). In the two paragraphs discussing the topic, the target communities are inconsistently referenced. In the first paragraph “low-income” is mentioned while in the second paragraph, “minority, tribal, and low-income” and “minority and low-income” is mentioned. I assume that all three-minority, tribal, and low-income- are all equivalently covered by this principle. I wonder, however, if it is time to focus on “low-income” communities rather than stigmatize all tribal and minority communities.
7. Environmental justice (page 12). The principle is concerned with avoiding disproportionate adverse effects on disadvantaged communities. Shouldn't the principle also emphasize that these communities should also share in the benefits?
8. Discount (interest) rates (page 22, line 12). The principles and standards emphasize “sound science.” Requiring that “costs and benefits shall be discounted using rates prescribe by law or executive order” does not seem to necessarily follow sound science or sound economics.
9. Suggest adding “Environmental Justice” to the glossary.

Sincerely,



Roger Kilgore, P.E.  
Principal