

Concerns with Utah Division of Water Resources Lake Powell Pipeline Draft Study Reports

Citizens for Dixie's Future

Based on CDF's review of the Initial Study Reports, we find the \$24 million studies to be poorly executed. It does not appear that the UBWR has complied fully with the terms of the 2008 study plans as approved by FERC, or has otherwise fully achieved the objectives of the study plans. CDF found in many instances the UBWR did not report vital environmental information that was to be provided pursuant to the study plans. In some cases, critical data was misinterpreted in draft study reports; in others it was completely omitted. In our comments, CDF asked that FERC require the UBWR to perform studies which were not conducted per the approved study plan and add new studies where the Initial Study Report demonstrates that study objectives cannot be met pursuant to the existing study plan. We believe that without the recommended changes, the scientific record on which the new license is based will be fundamentally flawed. This is largely due to the study reports failure to consider Climate Change projected reductions in flow to the Colorado River, and their unsupported assumptions regarding projected population growth and water demand.

In the Bureau of Reclamation's (BOR) report *Reclamation Managing Water in the West, Secure Water Act Section 9503 (c)–Reclamation Climate Change and Water 2011*, it appears there is solid scientific evidence of climate change in the Colorado River Basin. We submitted this report with our comments (Attachment A), and requested that climate change impact of future flow reductions be included in the environmental analysis of the Lake Powell Pipeline project. This report is a more accurate reflection of BOR's current prediction of reduced future flow of the Colorado River due to Climate change than what was included in the draft study reports.

The requested amendments and additions to the studies are critical. These reports will influence communities' decisions to build and depend on a billion dollar project to provide consistent amounts of water until 2070, the term of license, and beyond. CDF requested that FERC modify the study reports consistent with our recommendations to assure the adequacy of the licensing record.

In addition, CDF is concerned that all of the environmental studies were based on faulty population and water demand estimates. These overstated figures are used as the basis for the need of the Lake Powell Pipeline project by 2020. CDF requested that UBWR wait to proceed with this project until more current and accurate population data is available.

Finally, several of our most important concerns from the scoping process have not been integrated in a satisfactory way into the draft study reports.

Many of the public comments express similar concerns or issues during the scoping process:

- 1. “ increased water conservation can delay the need for the pipeline or other water supply projects;*
- 2. supplying water to allow the predicted population growth will diminish the quality of life in the region;*
- 3. the estimated cost of the pipeline is increasing and little is known about how the final cost of the pipeline will affect fees and the taxes and rates paid by water users; and*
- 4. continued droughts and climate effects from human activity could put the supply of water from Lake Powell Reservoir at risk.”¹*

UBWR missed the point by not addressing these important issues in the draft study plan reports. Some of the proposed draft study reports fall short and should not be considered as complete by FERC because they did not address adequately these core controversial issues of the Lake Powell Pipeline project.

These studies are being initially funded by Utah’s UBWR. Upon approval, regional Water District’s impact fees will repay the cost of the studies and construction costs of the pipeline. Currently, the Water District’s impact fee account has no funds. CDF is concerned about the funding resources available to this project.

¹ FERC eLibrary 20080821-3005, Scoping of Environmental Issues for the proposed Lake Powell Pipeline Project, August 21, 2008, p.7 available at <http://www.powellpipelinefacts.org/images/pdf/Pipeline/ferc%20scoping%20doc.%202.pdf>