

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

\_\_\_\_\_) )  
Utah Board of Water Resources,) )  
Lake Powell Pipeline Project ) P-12966-001  
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**LAKE POWELL PIPELINE COALITION’S COMMENTS ON MODIFIED  
DRAFT STUDY REPORTS**

Pursuant to 18 C.F.R. § 5.15, The Lake Powell Pipeline Coalition (Coalition) hereby comments on the State of Utah’s “Modified Draft Study Reports of Utah Board of Water Resources” (UBWR) for the Lake Powell Pipeline Project, eLibrary no. 20120130-5041 (January 30, 2011) and eLibrary no. 20120202-5052 (February 2, 2012).

The Coalition consists of: Citizens for Dixie's Future, American Rivers, Glen Canyon Institute, Grand Canyon Wildlands Council, Living Rivers - Colorado Riverkeeper, Sierra Club, and the Town of Springdale, Utah. The descriptions and interests of member groups are stated in our Scoping Document (SD1) Comments (July 7, 2008), e-Library no. 20080707-5206 and said description is hereby incorporated by reference.

**I.  
COMMENTS ON MODIFIED DRAFT STUDY REPORTS**

The Coalition has appreciated the Federal Regulatory Energy Commission’s (Commission) review of the Lake Powell Pipeline project through the Integrated Licensing Process (ILP). Based on our review of the Draft Study Reports, it does not appear that the UBWR has taken into account the Great Recession and the associated dramatic slowing of population growth. The financing of the project has also been called into question by the Utah State treasurer due to the economic downturn as the state has reached its bonding limit. In addition, none of the water district participants’ have shown the ability to pay for the Lake Powell Pipeline. Yet, these studies continue to recommend the Lake Powell Pipeline on a false premise that the Lake Powell Pipeline would be needed by the year 2020. With Washington County having some of the highest per capita water use, the cheapest price water in the west and a decrease in growth there is room for improvement before importing water from the already over-allocated Colorado River.

## II. SPECIFIC COMMENTS ON MODIFIED DRAFT STUDY REPORTS

We comment on Washington County's issues and alternatives described in the Modified Draft Study Reports. For ease of reference, our comments track the title and outline number in these documents for each section where we have a comment. Quotations from the study reports are in italics.

### **Modified Draft Study Report 10 Socioeconomics and Water Resource Economics**

#### **1.3.1 WCWCD No Lake Powell Water Alternative**

**Page 1-23 reads:**

*The WCWCD would develop a reverse osmosis (RO) advanced water treatment facility to treat up to 40,000 acre-feet per year of Virgin River water with high total dissolved solids (TDS) concentration and other contaminants. The RO advanced water treatment facility would produce up to 36,279 acre-feet per year of water suitable for M&I use.*

*The remaining needed water supply of 32,721 acre-feet per year to meet WCWCD 2037 demands would be obtained by reducing and restricting outdoor residential water use in the WCWCD service area.. Therefore, beginning in 2020, the existing rate of residential outdoor water use would be gradually reduced and restricted to 14.9 gpcd, or an 85.4 percent reduction in residential outdoor water use.*

*The combined would equal 69,000 acre-feet per year of M&I water to help meet WCWCD demands through 2037.*

**Comment:**

UBWR's proposed alternative for the Lake Powell Pipeline used for the economic analysis does not meet NEPA standards. Specifically, NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and action is taken. The information must be of high quality.<sup>40 C.F.R. §1501.1.</sup> Further, NEPA requires the EIS to examine all *reasonable alternatives* to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "*reasonable*" rather than on whether the applicant likes or is itself capable of carrying out a particular or feasible from the technical and economic standpoint and using *common sense*, rather than simply desirable form the standpoint of the applicant.<sup>40 C.F.R. §1502.14</sup>

NEPA requirements state that alternatives considered must be both reasonable and feasible. The proposed alternative of reverse osmosis and restrictions of only 14 gallons per person per day for residential outdoor watering does not meet these requirements. Within the draft study reports, this alternative is declared unfeasible, and unreasonable. Draft study report 22 describes the alternative as “draconian” and UBWR’s Water Needs Assessment page ES-28, March 2011 states:

*“advanced water treatment processes (e.g. reverse osmosis) are assumed to be financially and environmentally prohibitive with regard to providing culinary water from local surface waters.”*

Despite acknowledgement within the study reports that this alternative is unreasonable and unfeasible, UBWR has reasserted this as their only alternative to Lake Powell Pipeline Water. Consideration of reverse osmosis as the alternative creates an illusory rationalization for Lake Powell Pipeline water. By presenting the most expensive alternative UBWR neglects to examine true reasonable and feasible alternatives in favor of a calculated unfeasible option. Despite the Water Needs Assessment claims that reverse osmosis is financially and environmentally prohibitive, study report 22, and study report 10 shows it is economically feasible to implement reverse osmosis by the year 2020. This obvious contradiction must be addressed in the final study report.

In addition, UBWR did not look at increased water conservation across all sectors and all water supplies. Rather, they target only residential outdoor use and suggest extreme reduction levels. The study report also does not explain how UBWR would implement requirements on the six largest cities that have their own water rights to reduce existing home owners to only 14 gallons per person per day (gpcd) for residential outside watering starting in 2020. The final study report needs to include implementation procedures and corresponding legal rights to be able to successfully implement those procedures. Since there is only one water meter per home would the city only allow 72 (gpcd)<sup>1</sup> for inside and 14 gpcd for outside water use to equal only 86 gallons a day? This alternative is unrealistic and not enforceable.

Further, the proposed No Lake Powell Pipeline Water Alternative arbitrarily fails to consider alternatives that could better comport with NEPA’s environmental regulations such as, among other things, other local supplies, private landowner water rights, *increased* water conservation in all sectors, better efficiency, *increased* water reuse, *increased* agricultural conversions, *increased pricing*, land use planning strategies, and other mechanisms for providing water (or reducing demand) that might equally meet future water demands by the year 2020-2037 in a more economic and sustainable manner.

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<sup>1</sup> Water Needs Assessment, March 2011, residential indoor water use Table 3-10 page 3-14

Further, NEPA requires that the Alternative be redesigned to take all of these factors into consideration. Finally, this Alternative would be more consistent with the Commission's Equal Consideration - Section 4(e) of the Federal Power Act that requires FERC to give "equal consideration to the purposes of energy conservation, the protection, mitigation of damage to, and enhancement of, fish and wildlife, the protection of recreational opportunities, and the preservation of other aspects of environmental quality."

The Coalition's concerns on this issue are widely echoed by federal agencies. For example, BLM also wrote of their concerns about the alternatives in their study report comments:

**BLM's Comments 79:<sup>2</sup>**

***General Comments***

*"Alternatives - The development of viable alternatives is lacking, a major concern for the legal sufficiency of the EIS, as outlined in the CEQ Regulations (43 CFR 1500). In particular, the No Lake Powell Water alternative appears to lack any realistic analysis. It reads more like a justification for constructing the pipeline instead of being a viable alternative to the pipeline."*

***UBWR Response:***

*"The Alternatives Development draft study report was performed as specified by FERC to identify and define an action alternative to the LPP Project that would not involve conveying water from Lake Powell to the three southwest Utah sponsoring water conservancy districts. The UDWR disagrees that the No Lake Powell Water Alternative is a justification for constructing the pipeline instead of being a viable alternative to the pipeline."*

The U.S. Fish and Wildlife Service stated their concerns about the alternative.

USF&WS's letter to FERC on the Study Report:

*... "We are concerned that the Alternatives Development report #22 extends beyond technical information, and makes improper assumptions about Federal action agencies policy decision, and inappropriate assumptions about the parameters of NEPA Alternatives and analysis. Our ability to comment on the adequacy of the study reports for the project alternatives is constrained by the fact that no purpose and need statement has yet been articulated from FERC. Without a purpose and need statement, it's unclear how the range of project alternatives (which necessarily depend on the purpose and*

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<sup>2</sup>Utah Board of Water Resources (UBWR) response to comments on the draft study reports (ISR) FERC and initial study report meetings July 28, 2011, page 9

*need) will be determined, and in turn, whether the full range of studies necessary to evaluate alternatives is fully identified.”*

The Grand Staircase-Escalante National Monument also had concerns about the alternative.

Letter to FERC from Grand Staircase-Escalante National Monument, May 6, 2011, re: Draft study plan reports, page 1. *“The development of viable alternatives is lacking, a major concern for the legal sufficiency of the EIS.”*

Despite the concerns from multiple federal agencies, and the above cited NEPA regulations UBRW did not change the proposed alternative.

Alternative development is integral to the Environmental Impact Statement (EIS). UBRW has declared they would not change the proposed action alternative despite substantive failures to meet NEPA requirements. Therefore, as the lead agency, the Commission is responsible for ensuring compliance with NEPA in the licensing context. The proposed Alternative should be grounded in a “Rule of Reason” and make a good faith effort to ensure a viable alternative is evaluated. We ask the Commission to recommend changes be made to the alternative by UBRW so that the proposed analysis complies with the National Environmental Policy Act (NEPA). The Coalition is concerned that public funds continue to be spent in finalizing these studies despite the apparent and obvious flaws in alternative development. The Coalition strongly believes the proposed alternative is not feasible, or reasonable, or executable and therefore does not meet the minimum NEPA requirements for use in the EIS.

### **Chapter 3 Alternatives Development Draft Study Report 22**

#### **Conceptual Project Alternatives**

##### **3.1.1. Equivalent Population Water Needs**

###### **Page 3-1**

*“The equivalent population of each district is the population level at which **no additional water supplies** are available to meet water needs. This assumes **all conservation goals are met, all water rights have been fully developed; all secondary water conversions have been made.**”*

#### **Comment:**

The guidelines for equivalent population level at which no water supplies are available were not met. UBRW used the wrong data by not including all the water supply information for the study. In addition, conservation goals for Washington County are artificially low and have not changed since the 2008 Water Needs Assessment. To have meaning and substance, these goals must be

reassessed and should equal the achievable conservation goals other areas with similar climates have put in place. Without meeting these guidelines, the basis for the alternatives conclusion is flawed.

The Washington County Water District predicts that the county will run out of additional water in just 8 years, by 2020. Data used in these predictions is outdated and irrelevant given the current economic picture. UBWR assumptions that Washington County population will reach 279,864 in 2020, and double again to reach 516,420 by 2035 is not based on current conditions and should not be used as the basis for the studies.

The Coalition understands the UBWR will revise the studies based on updated Governor's Office of Planning and Budget (GOPB) population estimates in July. UBWR assumed approximately an annual growth rate of 5% to conclude additional water would be needed by 2020. Revised predicted growth rates will surely reflect a rate much lower than 5%. Based on inflated current population numbers and future growth rates, annual water demand in 2020 is suggested to be 96,526 acre feet for a population of 279,864 people.<sup>3</sup>

**In July, we expect population estimates will be much lower than previously predicted and therefore corresponding water demand will also be dramatically reduced. The entire need for the Lake Powell Pipeline will need to be reassessed and there is a strong argument the Lake Powell Pipeline water will not be needed by 2020.**

The Commission should stop the studies unless it can clearly establish the need for the Lake Powell Pipeline by 2020 supported by the 2012 GOPB population estimates. This approach will conserve precious tax paper moneys and eliminate spending on a flawed study.

UBRW's proposed alternative does not count all the large amount private landowner water rights in the county that could convert to culinary use in the future. A quality EIS must rely on transparency in data and include all the water supplies in the county including the Washington County Water District's current 147 water right certificates. Also, the total amounts of water in storage must be reported to give a complete picture of water that will be available. For example, when full, there are 160,000 acre feet of water in storage in Quail Lake and Sand Hollow's Reservoirs and Sand Hollow's aquifer projects. Only a small amount of water is sold out of Sand Hollow Reservoir. The No Lake Powell Pipeline Water Alternative does not consider all the water in storage and is a narrow look of future water availability in the county.

Relying on this narrow view is the basis for the prediction that Washington County will run out of water for growth in just 8 years. This misleading representation to federal agencies and the public is not accurate. The UBWR has comprehensive information on current water rights and, in due diligence, should include a comprehensive list of these in the final study report. All relevant

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<sup>3</sup> Alternatives Development Study report 22, March 2011, 3-6 page

and important information must be included as a basis for the EIS. This substantial evidence should be requisite to the Commission's records leading to the final decision.

UBWR claims there is only about 96,529 acre feet of water to be used for culinary and secondary use by 2020-2037, but that does not represent the actual amount of water that is available in our area. In the Coalitions' research we have found significantly more water than the UBWR discloses in the studies.

## **The Coalition proposes an Action Alternative**

### **Citizens Alternative**

The Coalition requests that the Commission include a "Citizens Alternative" to be studied in the EIS. This is a reasonable and cost effective alternative. We have included the concept in all of our previous comments. This alternative is less damaging to the environment and a more practicable alternative to meet current or future water supply demand 2020-2037. It includes:

- Water conservation reductions across all sectors including residential indoor and outdoor use; commercial; industrial; secondary and institutional water use.
- A more aggressive water conservation goal than what is proposed by UBWR. Many states have set and met more aggressive conservation goals. We outlined in Scoping Document 2 (SD2) that Utah water agencies are meeting the target of 12% much faster than the Washington County Water Conservancy District's forecast of only 12% saving by 2050. Before proceeding, the study report should look at a more aggressive conservation approach and consider the possible water savings.
  - The State of Utah has adopted a conservation goal to reduce per capita water use 25% by the year 2050.<sup>4</sup> This is a fairly modest goal at 0.5% per year, considering that many utilities in Colorado are planning to reduce water use by 1% per year.<sup>5</sup> In addition, state-wide water use already dropped 12% from 2000 to 2005 and further reductions will be achieved through "passive" conservation measures. More substantial improvements in water use efficiency are both realistic and achievable within the next 25 years.
  - Many utilities throughout the West expect to reduce per capita water use by 1% per year. This represents a good estimate of what is achievable for Washington County, especially considering water use has been reduced 13% within 6 years

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<sup>4</sup> The baseline year is 1995 in some cases, 2000 in others.

<sup>5</sup>Western Resource Advocates. 2007. Front Range Water Meter: Water Conservation Ratings and Recommendations for 13 Colorado Communities. November.

from 2005-2011. Future conservation savings estimated herein use a 1% per year reduction for the first 25 years and a 0.5% per year reduction for the following 30 years. This results in a 40% total reduction of year 2005 water use by 2060. The Utah Board of Water Resources in their 1993 Water Plan also had a similar recommendation for water conservation that 1% per year was achievable.<sup>6</sup>

- The Jordan Valley Water Conservancy District in Utah provides water to the cities of West Jordan, South Jordan, Sandy, Midvale, Riverton and South Salt Lake as well as numerous irrigation districts, committed to reduce use by 25% from 2000 levels by 2025. As of 2004, the Jordan Valley Water Conservancy District already had seen a 20% reduction, lowering their per capita water use from 250 to 207 gpcd in only four years.<sup>7</sup>
- Implementation of a higher block rate pricing strategy to reduce water use from the current low rates. Current water pricing in St. George is the lowest in the western states. (see chart below)
- Accurate accounting of water supplies.
  - Counting more agricultural water as a transfer to culinary. In 1991 UBWR estimated agricultural water at 87,800 Acre Feet Year (AFY). Of this, only 4,000 AFY of agricultural water is being considered for conversion to culinary use and 12,400 AFY for secondary use by the year 2037.
  - Accurate accounting of water supplies within reservoir and aquifer storage. In 2008, the artificial recharge to the Sand Hollow aquifer was estimated to be 70,000 AF. The water district has stated this aquifer could hold up to 200,000 AF of water. But, the district only counts a small amount of 8,000 acre feet annually that could be used for culinary use by 2060. Additionally, the water district predicts it can only sell 7,500 AFY by 2060 of the 50,000 acre foot Sand Hollow Reservoir.
  - Hundreds of thousands of acre feet of private landowner water rights are within the Washington County Water District's area. UBWR is not willing to count any conversion to culinary use to the year 2060. If UBWR refuses to acknowledge these rights, private land owners must be notified of this over allocation.
- Water recycling possibilities are not explored by UBWR and should be included.

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<sup>6</sup> Utah State Water Plan, Kanab Creek/Virgin River Basin 1993, p.11-4 "The projected water use for the basin is based on the assumption conservation is applied and the per capita use is reduced one percent per year from 1995 until 2010, one half percent per year until 2020."

<sup>7</sup> Jordan Valley Water Conservancy District, 2004-2005 *Summary of Operations*, p. 49.

- Water reuse is low and could be increased from the 14,000 acre feet that is being proposed possible to 2037.
- Accurate accounting of water use per person; several different figures are cited. The Washington County Water District must show an accurate accounting and use that figure consistently despite the purpose of the report. The state needs to set a standard for accurately accounting for water use that would be used for all entities.
- An accounting of water diverted from the Virgin River and the amount of water delivered back to the river through the Water District's hydropower plants should be included in the studies. The Water District may divert more water than they report as possible future water supply.

The Citizens Alternative would be in the best interest of the communities involved from both a cost perspective and an environmental perspective.

### **Water Conservation**

We recommend the study report fully consider *increased water conservation*, recycling and include an accurate accounting of all future potential sources of water be considered before the Commission approves this study report as complete and ready for analysis in the EIS.

In Scoping Document 2 (SD2) the Commission stated that scoping was intended to serve as a guide to issues and alternatives to be addressed in the Environmental Impact Statement (EIS). The public expressed concerns in the scoping process that should be addressed in the EIS, the Commission's comments read:

The Commission's Scoping Document 2 (SD2) comments mentioned that increased water conservation was a concern in scoping. It reads:

*"As shown in both the transcripts of the scoping meetings and in Appendix A, many individuals have provided either oral or written scoping comments, or both, concerning the Lake Powell Pipeline proposal. Many of the public comments express similar concerns or issues:*

*Increased water conservation can delay the need for the pipeline or other water supply projects."*<sup>8</sup>

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<sup>8</sup> FERC elibrary 20080821-3005, Scoping of Environmental Issues for the proposed Lake Powell Pipeline Project, August 21, 2008, p.7

**Comment:**

UBWR continues to ignore the possible scenario of *increased* water conservation in all sectors in the proposed alternative and only targets reducing residential outdoor watering. Due to the public's comments, increased water conservation as a solution to importing water should be analyzed in the EIS.

**1.5.1 Water Resource Economics**

**Page 1-26**

- *Provide a clear picture of Project economic benefits and costs, including: 1) a comparison to Project alternatives; and 2) reviewing the economics of conservation measures and available water right changes/transfers from irrigated agriculture or other water supply sources, as designated by the water supply study.*
- *Determine Project (and alternatives) marginal costs and cost allocations to the Water Conservancy Districts. In terms of new supply options and marginal costs, consider the general economic impacts on the Districts and to the state; clarify the likely fiscal impacts.*

**Comment:**

The study report is not clear what the benefits/costs are in dollar amounts for actions listed above. In addition, the study report does not explain the *economics of conservation measures* or other water sources that could be available in the study report.

UBWR varies from the specific requirement of the approved study plan by not including the economics of water conservation measures that could be *increased* from the low estimate of only 12% by the year 2050. UBRW has a 25% conservation goal by 2050. They state that there has been a 13% reduction within 6 years from 2005-2011. But, predicts it can save another 13% by the 2050 thirty nine years later. *Increased* conservation goals must be considered, with actual past savings being used as a basis for future goals.

The study reports do not clearly explain in detail the fiscal impacts repayment will have on each of the counties served by the Water Districts pursuing this project. For example, the study report still lacks detail on the effect of increased impact fees, surcharges and taxes residents will have to pay for the Lake Powell Pipeline. These effects should be considered in the cost benefit analysis.

In Scoping Document 2 (SD2) the Commission stated that scoping was intended to serve as a guide to issues and alternatives to be addressed in the Environmental Impact Statement (EIS). The public expressed concerns in the scoping process that should be addressed in the EIS, the Commission's comments read:

*“As shown in both the transcripts of the scoping meetings and in Appendix A, many individuals have provided either oral or written scoping comments, or both, concerning the Lake Powell Pipeline proposal. Many of the public comments express similar concerns or issues:*

*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;<sup>9</sup>*

Yet, UBRW still does not address the actual cost and the effect to the water users and taxpayers in this study report.

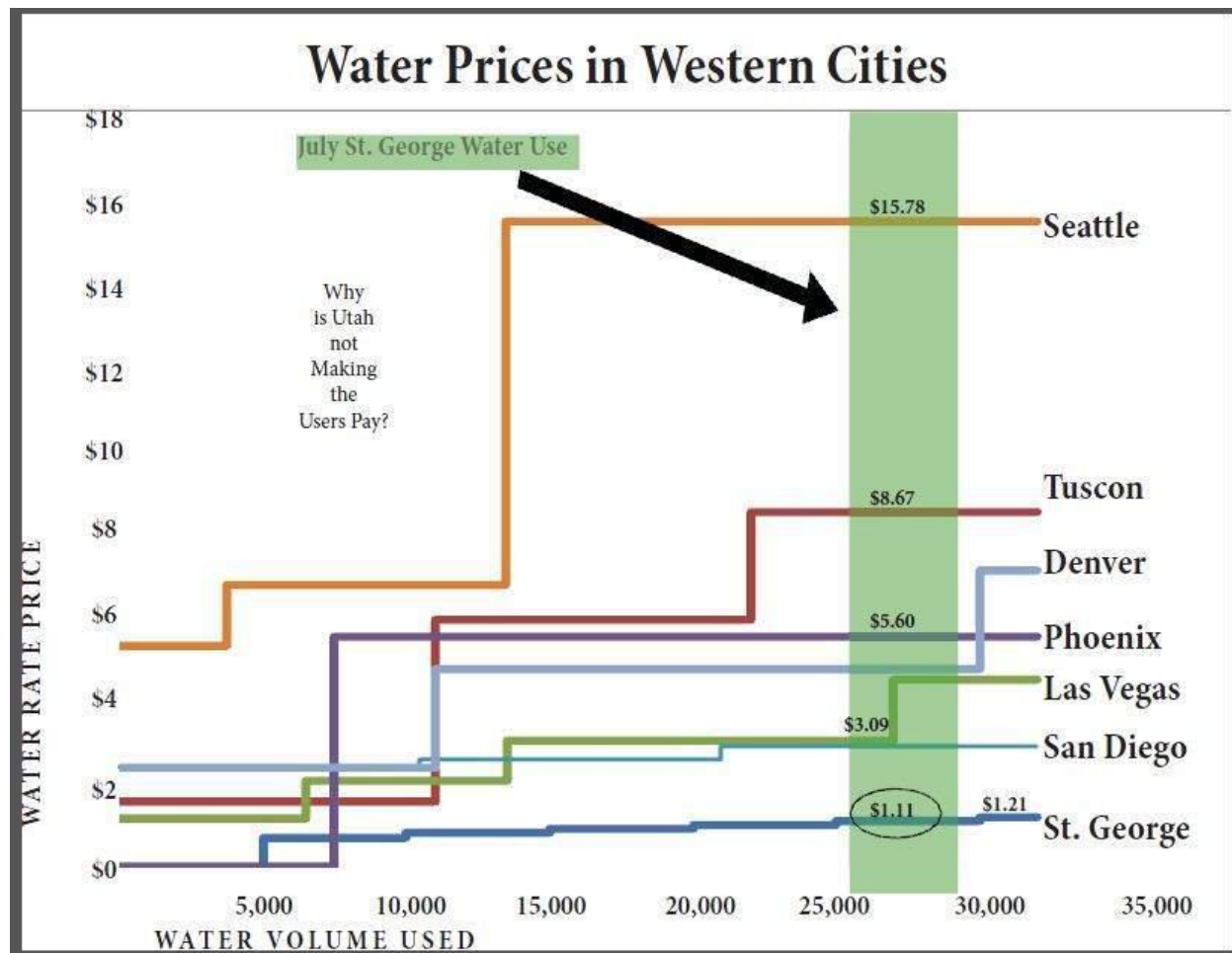
### **Water Pricing**

Washington County has some of cheapest water in the west coupled with the highest water use in the west. It is widely known that water pricing is one of the most effective conservation measures. UBRW does not consider adjusting prices to parallel those of comparable markets, which will likely result in increased.

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<sup>99</sup> FERC elibrary 20080821-3005, Scoping of Environmental Issues for the proposed Lake Powell Pipeline Project, August 21, 2008, p.7

Chart courtesy of Utah River's Council



#### 2.2.1.1 NED Analyses Assumptions

- NED account Project benefits are:**  
*Water values: Alternative project costs are based on reverse osmosis (RO) reuse values, which are the most likely alternative supply to the Project, where the LPP Project defers the need to develop an RO plant and annual operations (affects the bulk of future water supply needs). The Project also would avoid transferring existing residential outdoor use of culinary water, with **residence retrofits required to implement xeriscape conditions.***

**Comment:**

This section should be changed to be easily understood by the public. Detailed explanation of what the benefits are, their value and how their value was determined should be included in the study. For example, the derivation of the benefit/cost of not transferring existing landscaping by taking out the grass, trees and shrubs and turning the yard into xeriscape should be detailed. Would the city pay to have this done? We recommend the benefits be quantified in dollar amounts and described in detail in the assumptions.

**Lake Powell Pipeline Coalition Comment 45.5<sup>10</sup> draft study reports**

*NED 2.2.3 to the study plan report:*

*(1) Existing water supplies. Existing water supplies are included in the with or without-project condition. Make adjustments to account for anticipated changes in water supply availability because of the age of facilities or changed environmental requirements.*

*(3) Additional water supplies. The without-project condition includes water supplies that are under construction or authorized and likely to be constructed during the forecast period.*

*(6) Nonstructural measures and conservation. The without-project condition includes the effects of implementing all reasonably expected nonstructural and conservation measures. These measures include:*

*(1) Reducing the level and/or altering the time pattern of demand by metering, leak detection and repair, rate structure changes, regulations on use (ie, plumbing codes), education programs, drought contingency planning; and*

*(2) Modifying management of existing water development and supplies by recycling, reuse, and pressure reduction; and*

*(3) Increasing upstream watershed management and conjunctive use of ground and surface waters.*

**UDWR Response:**

*Items (1) through (6) have been taken into consideration in the development of alternatives in draft Study Report 22.*

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<sup>10</sup>Utah Board of Water Resources (UBWR) response to comments on the draft study reports (ISR) FERC and initial study report meetings July 28, 2011, page 94

**Comment:**

The Coalition finds that these items were not sufficiently addressed in the draft study reports. Measures that deserve further consideration include; *increasing* conservation, agricultural conversion, pricing, recycling and reuse.

**4.1.1 Population Forecasts**

**Page 4-1**

*However, the long-term population growth rate trend for the future was expected to remain largely the same.*

This sentence above should be deleted. At the 2012 Southern Utah Economic Summit, Lecia Langston of Utah Work Force Services stated, “Do not expect to see the rate of population growth to be as high as in past years.” Population growth predictions post-recession will be much less than what they were in pre-recession. The report needs to address how the recession has hurt the housing industry and subsequently altered growth patterns in Washington County.

**Chapter 5**

**Water Resource Economic Benefits and Costs NED Analyses**

**Page 5-1**

*The B/C ratio is about 1.49.*

**Comment:**

The cost /benefit, B/C ratio should be explained in better detail so the public can understand what the concept means. This study report fails to educate the public on the benefit and costs of Lake Powell Pipeline in a manner so the public can understand it. The data that defines a benefit and how the alternatives were compared must be included more clearly in the final study report.

There is still no clear explanation in the economic study report of the risk and uncertainty that the Colorado River will not be able to supply water to the lake Powell Pipeline. This is a risk that should be reflected in the economic analysis. This was a major issue in scoping and needs to be included in the final study report 10's analysis for the EIS.

The Coalition has included the concern in all our previous comments. Public concerns from scoping are still not included in the study reports and should be. In Scoping Document 2 (SD2) the Commission stated that scoping was intended to serve as a guide to issues and alternatives to

be addressed in the Environmental Impact Statement (EIS). The Commission's comments on this read:

*"As shown in both the transcripts of the scoping meetings and in Appendix A, many individuals have provided either oral or written scoping comments, or both, concerning the Lake Powell Pipeline proposal. Many of the public comments express similar concerns or issues:*

- 1. continued droughts and climate effects from human activity could put the supply of water from Lake Powell Reservoir at risk."*<sup>11</sup>

## **Chapter 8**

### **Socioeconomics Baseline (Action and No Action Alternatives)**

#### **8.1 Population Trends for Washington, Iron, and Kane Counties, Utah**

##### **Pages 8.1-8.44**

##### **Comment:**

For the information to be of high quality, a discussion of the Great Recession and its impact on the housing market should be included in this section of the study report.

In recent years, the number of new building permits issued in Washington County has plummeted. In 2006, when the Impact Fee study was completed, there were 2,054 residential building permits issued. This rapid expansion was expected to continue with a population growth rate of about 5% until 2020. Unfortunately, in 2011 there were only 886 residential permits issued. Further, building permit growth is not expected to increase until the excess supply in housing is reduced. The current housing market is flooded with foreclosures; in 2011 there were 1165 foreclosures and 1476 Notices of Defaults. This supply of existing homes will further slow the Water District's impact fee collection. Growth in our area has decelerated dramatically and the concept that impact fees will pay for the majority of the Pipeline is no longer valid. In February, Notices of Foreclosures have spiked up again.

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<sup>11</sup> FERC elibrary 20080821-3005, Scoping of Environmental Issues for the proposed Lake Powell Pipeline Project, August 21, 2008, p.7

### **Public Comments:**

The Coalition has commented throughout the licensing process and worked to educate and engage the public in this process. The Coalition has found that the FERC web site is not user friendly for the public to make comments. In fact, the current structure deters the public from commenting. FERC should consider revamping its web site to make it easier for the public to make comments. The complex procedure to submit longer comments needs to be simplified and be similar to other federal agencies and provide an email address.

### **III. CONCLUSION**

The Washington County Water Conservancy District's (Water District) forecast for water demand is artificially high because it incorporates unrealistic population forecasts, outdated water use data, and unreasonably low estimates of future water conservation.

The Coalition has tried to demonstrate to the Commission in previous comments that this project is indeed a water project, and that the State of Utah is pursuing a FERC hydropower license to solely "bank" water for future development. There is no state bonding capacity to pay for the Lake Powell Pipeline or the pump storage portion of the project. The pump storage is just a concept and shows no real possibility of funding. In fact, at the recent public meeting, Ron Thompson, WCWCD manager stated that the pump storage project would not likely be pursued at this time. Without pump storage, the pipeline will consume more energy that it produces.

We ask the Commission to determine the modified study report #10 incomplete and not ready for the EIS because the UBRW proposed alternative is not feasible. \$24 million of public money has already been spent on this flawed study. As lead agency, the Commission should require the studies to comply with NEPA guidelines. The Coalition believes its "Citizens Alternative" which places a higher priority on boosting local water supplies, increased conservation, efficiency, increased reuse, and accurate water pricing is far more feasible than the current proposed alternative. Further the Coalition's Alternative will result in significant cost efficiencies and result in reduced environmental impacts and energy conservation and will meet future water demand by 2020-2037.

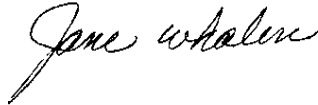
The Coalition's requested adjustments to the study reports are important because the study reports will influence communities' decisions to build a billion dollar water project. We request that Commission modify the study report consistent with our comments to assure all alternatives and their respective costs and benefits are properly assessed as required by law so that the decision makers and the public can make an informed decision.

We thank the Commission for considering these comments. We look forward to working with UBWR and the Commission on the Lake Powell Pipeline Environmental Impact Statement.

Attachment "A": Information on water conservation  
Attachment "B" Information on fiscal responsibility  
Attachment "C" Public Survey and list of published editorials on the Lake Powell Pipeline

Dated: March 23, 2012

Respectfully submitted,



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## “Attachment A”



# CITIZENS FOR DIXIE'S FUTURE

## The Lake Powell Pipeline: Bankrupting Our Legacy

The citizens of Washington County have a right to discuss the proposed Lake Powell Pipeline. This discussion must center on cost and actual need rather than scare tactics produced by the Washington County Water Conservancy District. Local citizens and future generations will bear the cost of this \$2 Billion government project. Initial project costs were estimated at \$250 Million and have now skyrocketed to over \$2 Billion. Can the citizens of Washington County afford this? Do we even need it?

Need for the Lake Powell Pipeline is based on a set of outdated assumptions of future population growth. These assumptions were formulated in 2008. The economic and growth picture has changed dramatically since that time.

Justification for the Pipeline also ignores the possibility of real water conservation. Washington County residents have some of the highest water use in the nation. If we reduced our water use to levels attained in similar climates, the need to bring in water from 140 miles away would disappear.

We live in a desert – a beautiful desert, but a dry place nonetheless. We can conserve our limited water resources and continue our tradition of stewardship in the desert by using our water and money wisely. As a citizen of Washington County you have a right to determine your future. Call state legislators to let them know you oppose the Lake Powell Pipeline. (See page 4 for phone numbers)

## A Water Wise Washington County

Washington County is one of the driest places in the West, yet it has one of the highest rates of water use. As Washington County's population continues to grow over the next several decades, water demands may exceed local water supplies. The Washington County Water Conservancy District has proposed one solution – to pump water from Lake Powell, 140 miles away, at a cost over one billion dollars which would be paid for by you, your children, and your children's children. Another solution – one that is cheaper, faster, and entirely local – is water conservation. Residents and businesses in Washington County can conserve water in cost-effective ways that won't sacrifice quality of life. Water conservation measures are reliable and well understood because hundreds of communities throughout

the West have already paved the way. Here we answer basic questions about water use and conservation, so that the residents of Washington County can create a future in which water is managed as much by them as it is by the water district.

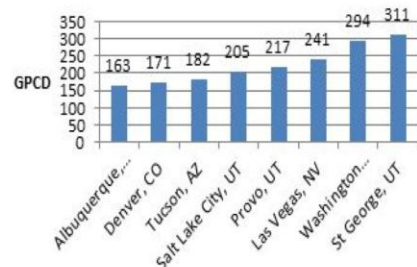
How much water is Washington County using?

When you take all the water used in a community on an average day – in homes, businesses, and in public spaces – and divide it by the number of residents, you get the system-wide number of gallons of water used per capita per day (gpcd). Currently Washington County uses 294 gpcd.

Compare that with the water used in by other arid cities, in the graph to the right:

continued on page 2

**Water Use Today in the West**



## What does a Water Conservation Lifestyle Look Like?

Inside the home you can save water, and money, in places where you use the most water – the bathroom, kitchen, and laundry room. Water-efficient devices such as dishwashers, showerheads, faucet aerators, and clothes washers can replace your older models, and will perform the same or better. In the long run you'll save money by using these devices because the energy and water savings are so large they'll more than make up for the up-front costs. Your water utility may help you to identify the best water-efficient devices and offer rebates on those models. Several utilities in the West even give out efficient showerheads and faucet aerators for free.

Outside the home, in the yard and in other landscaped areas, drip irrigation systems and rain sensors can help prevent overwatering of the landscape. And, your plants will look their best when receiving the right amount of water. The most water-efficient landscaping option is also a beautiful one – xeriscaping. This means planting native, drought-resistant plants and colorful flowers that require very little water and thrive naturally in the arid southwestern climate – it's definitely not rocks and concrete! Xeriscaping can also reduce the amount of time and money spent on landscape maintenance.



Written by Amelia Nuding Western Resource Advocates  
[www.westernresourceadvocates.org](http://www.westernresourceadvocates.org)

## A Water Wise Washington County (Continued)

While gpcd is not a perfect measurement for comparison, it still provides useful information. As can be seen from the graph, the cities outside Washington County have significantly lower water use rates. They have implemented common water conservation practices and achieved water savings of about 1% per year over the past decade or more. According to pipeline proponents, Washington County will only decrease its usage to 242 gpcd by 2060. This is more than many communities in the Southwest use today and reflects a modest reduction of only 0.5% per year. Greater water conservation is easily achievable for Washington County and will go a long way toward ensuring a sustainable future.

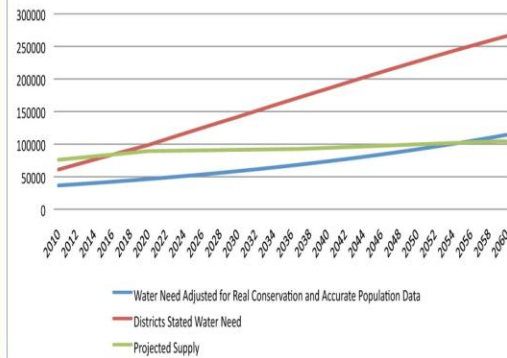
## Can water conservation prevent the need for the pipeline?

The Lake Powell Pipeline proposes to deliver 69,000 acre-feet of water to Washington County by 2060. Based on the number of people projected to live in Washington County in 2060, this amount of water wouldn't be needed if water use were brought down to 170 gpcd. This level of water use represents about a 44% decrease from today's levels, over 49 years, which is a similar level of reduction to other western communities. In addition to conservation, Washington County has other local water supplies that can be developed, such as increased underground water storage during times of surplus, and increased sharing of water with agriculture. Increased conservation and development of local supplies would provide flexibility for Washington County to meet water needs as they arise, in step with population growth. In contrast, the Lake Powell Pipeline plans for a fixed volume that would burden today's residents with a high price, for residents who have not yet arrived. Regardless of whether the pipeline proponents' growth predictions are right or wrong, everyone will have to pay the price if it gets built.

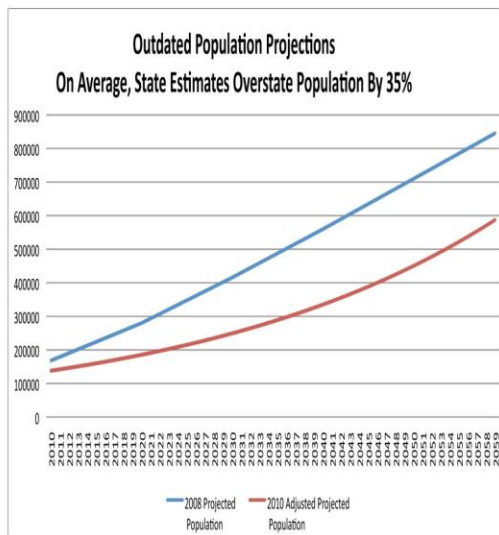
# What is Water Worth?

Why are rare stones so valuable? Why do people pay top dollar for Super bowl tickets? Its simple economics, the less there is of something the more expensive the price tag. This theory applies to all resources around us, but does not apply to water in Southern Utah. Though water is scarce in the desert, water rates in Washington County are some of the cheapest in the state and the west. Therefore, as residents over use water there is no financial consequence, and there is no incentive to conserve. Until we price water to reflect its real value people are going to keep wasting it. For instance, one gallon of gas costs around \$3.50, yet, the price of 1000 gallons of water is about \$.75. As gas prices rise, people drive less. The same would hold true in water use. Utah water policy allows Water Districts to subsidize water use through property taxes. Since we all pay property taxes, no matter how much you conserve, you are still paying for someone else's wasteful use of water. Southern Utah's current policies of cheap water rates and subsidizing water through property taxes do not promote water efficiency. The simple step of having all water in one rate and asking residents who use more water to pay more could save our community billions of dollars.

Future Water Demands are Much Lower than District Calculations



## Water "Needs": A \$2 Billion Dollar Bet?



Forecasts of the "need" for Pipeline water are based on 2008 population projections. These 2008 projections overestimated the 2010 population base by 18%. With actual population numbers falling well below past projections, it would be wise to re-evaluate the need for the pipeline based on the most current and best data.

In addition to high baseline projections, the study projects that Washington County will grow at a rate of 5% for the next 10 years. Recent data shows that Washington County grew only 1/2% in 2010. This vast overstatement of future populations has been the justification for the urgent need for the pipeline. But what if projections were revised to reflect the current situation? To put it simply, Washington County is not running out of water. The pipeline study's use of outdated population numbers and unreasonably low estimates of future water conservation are attempts to sway taxpayers and legislators into biting off a massive amount of debt to fund a wasteful and unnecessary government project.



## “Attachment B”

# THE LAKE POWELL PIPELINE: CAN YOU AFFORD IT?



CITIZENS FOR DIXIE'S FUTURE

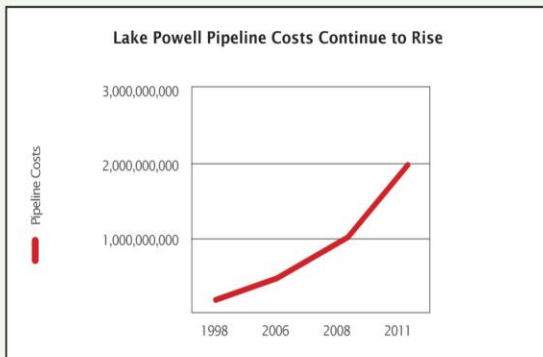
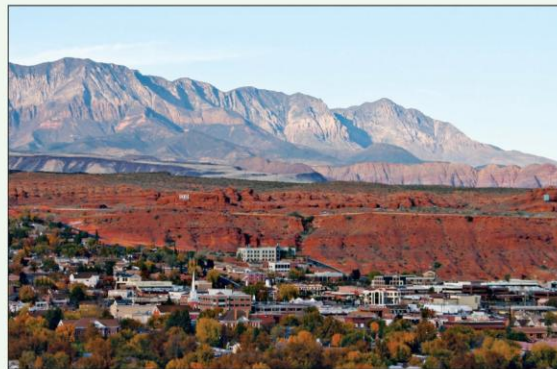
### Fiscal Responsibility is not Anti-Growth Economics

Citizens for Dixie's Future is committed to maintaining and protecting the quality of life in Washington County for present and future generations. Maintaining quality of life does not have to come at the expense of economic development, progress or growth. *In fact, community growth and progress that is well planned and sustainable allows for a vibrant economic picture which capitalizes on the unique qualities of our area.*

As part of this commitment, Citizens for Dixie's Future continues to question the justifications for the Lake Powell Pipeline (Pipeline) and the financial impacts this project will have on you, the residents of Washington County. *Questioning the rationale of developing a multibillion dollar unnecessary water project does not equate to an anti-growth stance. This type of questioning and examination of government spending is an active step towards fiscal responsibility.*

The Washington County Water Conservancy District (District) continues to seek funding for the Lake Powell Pipeline. This unelected body of officials has the ability to guarantee that the citizens of Washington County will foot 80% or more of the multi-billion dollar cost. There will be no state or federal funding for this project. Recent cost estimates show project costs range from \$1.4-\$2.7 billion. If the District is successful in pursuing the Pipeline, Washington County residents could be facing loan payments as high as \$70 million per year. And, yet, when State Legislators and Washington County residents have questioned the District's vague repayment plan, no real answers are given.

Citizens of Washington County deserve to know exactly how the Lake Powell Pipeline will impact their financial future. *What effect will increased impact fees have on the construction and real estate industry? How will residents on fixed incomes respond to potential water surcharge and property tax increases? How will the District make \$70 million dollar payments if growth levels fall short of their predictions? If we allow the District to pursue the pipeline without concrete answers to these financial questions we may find Washington County drowning in debt.*



“The US is drowning in debt as a result of a failure to live within our means... The politicians making these decisions may not be in office when the debt comes due.”

Dr. George Feiger  
2012 Southern Utah Economic Summit

PO Box 161 Hurricane, Utah 84737 • 435-215-8619 • email@citizensfordixie.org • www.powellpipelinefacts.org

## Water Conservation is Cost Effective

Simple sustainable water conservation measures would entirely eliminate the need to transport water 138 miles across the desert. While more aggressive water conservation does have costs, experts widely agree that it is the least expensive source of water available. With wise use of our current water resources improved efficiency, water reuse and recycling, and land management practices to conserve water our area can continue to grow and thrive sustainably without burdening future generations with crushing and uncontrollable debt.

## We Are Not Running Out of Water

This legislative session, the State Legislature will determine whether or not the entire state should subsidize the Lake Powell Pipeline. Unfortunately, the State is seeking to answer the questions of how to pay for the Pipeline before any real "need" for the Pipeline has been established. The Water District justifies building this massive project by stating that we will run out of water by 2020, only eight years away. But, when you look a little closer, it is apparent that these doom and gloom predictions are based on out dated and flawed data that does not accurately count the available water supplies within our county.

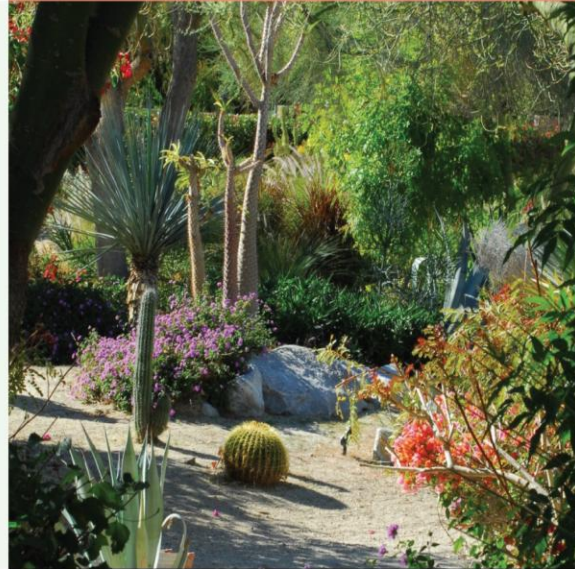
To thrive in the desert communities must have adequate water resources. But how much water is adequate? And, do we even know accurately how much water we currently have available for use? The truth is there are ample water supplies for our community to grow and thrive on the local resources we currently have. If we are good stewards and use our existing water supplies more efficiently, there is adequate water for future growth that comes without burdening future generations with compounding debt.

## Subsidizing Waste

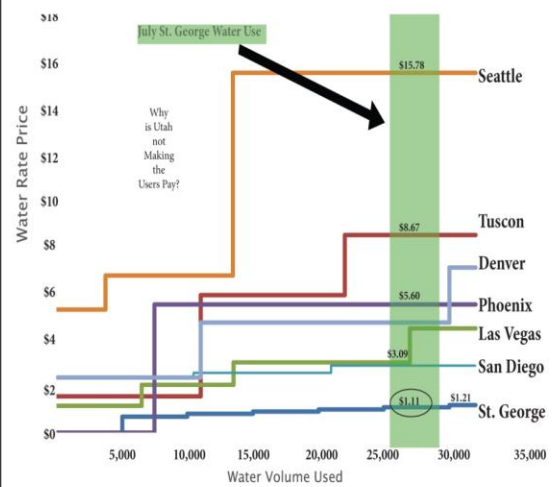
The District has also suggested that any shortfalls could be made up through property tax increases. *Currently, every property owner pays a line item in their taxes to the Water District. Utah is the only state in the West that subsidizes water supplier operations through property taxation.* In other states the true cost of water is reflected in water prices and the open market operates effectively; residents who use more water pay more, those who use less pay less. But, when you tax all homeowners to subsidize the cost of water, there is no incentive to conserve. Individuals and businesses do not suffer the consequence of their wasteful use. It is precisely this lack of incentive that has led Washington County to become the west's most wasteful water user.

The "need" for the Pipeline is based on subsidy economics. If property tax subsidies for water were eliminated and residents paid the true cost for the water they use, demand for water would be reduced. This reduction in water use would show a very different picture of the "need" for Lake Powell Pipeline water. Although the District frequently states that new growth should pay for new water projects, we can plainly see that in the end, the debt for the Lake Powell Pipeline falls on all residents.

*“Utah is the only state in the West that subsidizes water supplier operations through property taxation.”*



Water Subsidies Encourage Wasteful Use



Courtesy of Utah Rivers

## Who Will Pay?

If there is one thing that is certain about the Lake Powell Pipeline, it is that the expense is tremendous and keeps growing. In 1998, the Pipeline's cost was estimated at \$250 million; by fall 2008 the cost had risen to over \$1 billion, and the most recent estimates released in the 2011 Draft Economic Study Report shows costs as high as \$2.7 billion. Based on past water projects we can expect the costs for the pipeline to continue to increase before the project is completed. The burden of repayment will fall directly on the shoulders of Washington County residents. So, exactly how are we going to repay this debt?

## Impact Fees

According to the Water District's 2006 Regional Water Capital Facilities Plan and Impact Fee Study, the Pipeline would be funded "through a balance of local taxes, fees and water rate increases". Under the current plan, every family or business that buys a water hookup from the Water District would pay for the Lake Powell Pipeline through impact fees. In 2009, the water impact fee was \$5,021; by 2041 this fee will skyrocket to \$25,942. **Contractors, developers, real estate professionals, and homebuyers will all be affected by this non-value added increase in housing prices.**

This exponential increase in government fees is especially troubling in light of the fact that the estimated cost of the pipeline has tripled, yet the repayment mechanism has not. Because the District has not adequately explained how they will make up for this shortfall we are left with perplexing questions. **Will future impact fees need to be increased even more? Realistically, can the housing market in Washington County continue to recover and face added costs? Will future growth, including your children and grandchildren be able to afford a home?**

If the disparity in cost vs. repayment isn't troubling enough, consider the assumptions for growth built into the repayment plan. In recent years, the number of new building permits issued in Washington County has plummeted. In 2006, when the Impact Fee study was completed, there were 2,054 residential building permits issued. This rapid expansion was expected to continue with a population growth rate exceeding 5% until 2015. Unfortunately, in 2011 there were only 886 residential permits issued. Further, building permit growth is not expected to increase until the excess supply in housing is reduced. The current housing market is flooded with foreclosures; in 2011 there were 1165 foreclosures and 1476 Notices of Defaults. This supply of existing homes will further slow the District's impact fee collection. Growth in our area has decelerated dramatically and the concept that impact fees will pay for the majority of the Pipeline is no longer valid.

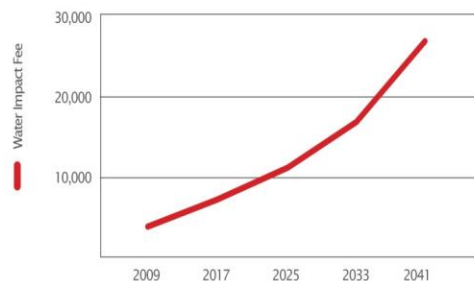
## Water Surcharges

To cover any shortfall in impact fees, the Water District has imposed a \$1.85 Water Development Surcharge on residents' utility bills in communities that have signed their Regional Water Supply Agreement. The District has the ability to increase this surcharge if impact fees do not cover water infrastructure costs. This surcharge is applied uniformly to all residents despite their individual use of water. Residents on fixed incomes do not have the ability to choose to conserve and reduce or eliminate this cost. **Families that choose to live within their means and use water efficient landscape practices will have no choice but to subsidize the wasteful use of others.**

“Do not expect to see the rate of population growth to be as high as in past years.”

Lecia Langston  
2012 Southern Utah Economic Summit

Lake Powell Pipeline Will Increase Housing Prices



## Who Finances Waste?

How do you fund a \$2 billion dollar project after a recession? The recession has left the state's finances hanging in a delicate balance. The state treasurer has warned that state bonding for the Lake Powell Pipeline could hurt the state's AAA credit rating and put the state over its Constitutional debt limit. Bonding to fund the pipeline may no longer be an option. After a summer full of debate, the State Legislature's Water Issues Task Force recently recommended a 15% earmark on future sales tax growth slated to finance the Lake Powell Pipeline and other water projects. ***Despite a lack of evidence for the actual "need" of Pipeline water, the Task Force has pressed forward by proposing this future earmark.***

The sales tax makes up about 83% of the general fund. Each legislative session, these funds are allocated to public services including public safety, higher education, workforce services, child and family services and health services. ***Earmarks prevent legislators from having the ability to come into session and look in real time at what the issues of the day are and then prioritize accordingly.*** The Water Issues Task Force's proposed earmark combined with last year's 30% transportation earmark would leave future legislators wrangling with 45% of sales tax revenue being unavailable to support the vital services provided by the general fund. Financing Washington County's wasteful water project would cost those who benefit from public services statewide.

## CONTACT

**The Washington County Water Conservancy District is seeking the support of the state legislature for funding the Lake Powell Pipeline. Call or email your legislator and tell them you don't want to pay for bonds, higher sales tax, higher property tax, or any other tax for water you don't need:**

1. Stay informed. Visit [www.citizensfordixie.org](http://www.citizensfordixie.org) for up to date information.
2. Contact your legislators and demand accountability and representation on this issue.
  - Lowry Snow: 435-628-3688 [vlshow@snowjensen.com](mailto:vlshow@snowjensen.com)
  - Don Ipson: 435-674-6301 [dipson@utah.gov](mailto:dipson@utah.gov)
  - Brad Last: 435-635-7334 [blast@le.utah.gov](mailto:blast@le.utah.gov)
  - Stephen Urquhart: 435-668-7759 [surquhart@le.utah.gov](mailto:surquhart@le.utah.gov)
3. To make a difference in Washington County's future join CDF or donate today.

**Contact Christi Nuffer for more information and volunteer opportunities. (435)215-8619**

## Borrowing Against Your Future

The Washington County Water District has requested that the state "loan" them the funds to construct the Lake Powell Pipeline. One might think that obtaining a loan from the state would be similar to getting a loan from the bank. A borrower would need to show positive credit history in addition to a solid business plan that shows how the funds will be repaid. This plan would include details on transaction quantities and volumes necessary to repay the debt. Unfortunately for Utah taxpayers, the District is not being held to these same standards. When the District was asked to produce a detailed business plan with information on how the loan from the state would be repaid, the legislators and the public were presented with nothing more than further justifications for the project.

An examination of the District's numbers makes it clear why they would avoid detail. To put it simply, there is no real feasible plan to pay for the Lake Powell Pipeline. The District is asking to be funded for this project on the basis that they have always outperformed and paid their debts. If there is one lesson to garner from the recent recession, it is that things don't always turn out as we hope. You do not have to look far to see projects that had millions of investment dollars turn belly up leaving the investors holding the tab. ***With the Lake Powell Pipeline, Utah taxpayers are the investors and are being asked to fund over \$2 billion dollars on a handshake.***

The taxpayers of Washington County and Utah deserve more. Before the state puts Washington County residents on the hook for annual payments as high as \$70 million, the District should be required to show in detail where this money will come from given the current economic and growth circumstances. The district has vaguely explained that repayment will occur through impact fees, water surcharges, and property taxes. Each of these mechanisms will impact Washington County residents, yet residents have had no say in whether or not they want to incur this debt and be responsible for the massive annual payments. ***The District has an obligation to explain to the public precisely how many building permits must be issued to cover this debt, the projected increase in water surcharges, and any potential impacts to property taxes.*** In addition, residents need to know what will happen if the District fails to raise enough revenue from these sources. Back room agreements and speculative payback scenarios are not acceptable or prudent management of taxpayer dollars.

***"Citizens for Dixie's Future is questioning the assumptions of the Water District."***

Mike Small, President  
Citizens for Dixie's Future

PO Box 161 Hurricane, Utah 84737 • 435-215-8619 • [email@citizensfordixie.org](mailto:email@citizensfordixie.org) • [www.powellpipelinefacts.org](http://www.powellpipelinefacts.org)

# **“Attachment C”**

## **Public Opinion survey and Articles**

### **March 2012**

#### **October 21, 2008 ,The Washington County Water Survey** **– New Vanguard Media Survey results**

Made 428 phone interviews with a 95% level of confidence.

In addition to phone surveys they also conducted 3 focus groups of 12 people each on 9/25. The following groups could NOT participate in the focus groups: elected officials, water district employees

#### **Water Conservation**

##### **-overwhelming support**

- thought public education was very important, especially in schools
- not at all familiar with the WCWCD (only one person knew anything about them)
- golf courses got most of the blame for over consumption

#### **Water Supply**

No one knew water came from the Virgin River

#### **Lake Powell Pipeline**

- Huge questions on how it would be financed
  - concerned with who pays & how
  - even mix of supporters & those who oppose
- primary cause of opposition was because they didn't know enough about it – education was key

#### **Results from phone survey**

188 people lived here less than 12 years

236 lived here longer than 12 years

#### **Rate issues of importance:**

1. water
2. air quality
3. recycling
4. destruction of the environment

*Lake Powell Pipeline Coalition's Comments on the Modified Draft Study Reports  
UBWR, Lake Powell Pipeline Project (P-12966)*

*March 2012*

**What is your most reliable source of information?**

Newspaper

Radio

City government

2<sup>nd</sup> from bottom was water district

**Which would you support to help conserve water?**

Smaller lawns – 50%

Higher water rates for using more water – 50%

**Where does your water come from?**

68% said wells, aquifers & reservoirs

responses also included turning on the tap

**How familiar are you with the WCWCD?**

Very – 15%

Not familiar – 46%

**How familiar are you with the Lake Powell Pipeline?**

Not familiar – 37%

Somewhat – 46%

Very – 17%

Note: From previous surveys the question was asked “Have you heard about the Lake Powell Pipeline?”

Year	Familiar	Not Familiar
2004	60%	30%
2005	46%	54%
2006	69%	30%

**Published Public Opinion Articles**

April 2006:

“Lake Powell pipeline won’t solve water problems” – Spectrum guest writer group (Don Triptow)

August 3, 2006:

“Emotion about tax increase will be rage” – Spectrum LTE (Joe Hennessey, Cedar City)

August 4, 2006:

“Iron County taxation is out of control” – Spectrum LTE (Jerry Jones, Cedar City)

*Lake Powell Pipeline Coalition’s Comments on the Modified Draft Study Reports  
UBWR, Lake Powell Pipeline Project (P-12966)*

*March 2012*

March 4, 2007:  
 “Lake Powell pipeline cost underestimated” – LTE (Doug Williams, St. George)

April 17, 2007:  
 “Everyone will pay” – Salt Lake Tribune Public Forum Letter (Janine Blaeloch, director Western Lands Project, Seattle, Washington) for Lake Powell Pipeline

May 20, 2007:  
 “Lake Powell pipeline delivers less than desirable future” – Spectrum guest editorial (Bruce Wilson, resident & author)

June 12, 2007:  
 “Let’s take charge of our future” – Spectrum LTE (Andrew Kramer, resident and retired architect)

June 7, 2007:  
 “Pipeline won’t solve a lengthy drought” – Spectrum LTE (Doug Williams, St. George resident)

July 15, 2007:  
 “Lake Powell pipeline won’t minimize drought deficit in southern Utah” – Spectrum guest op-ed (Bruce Wilson, author)

July 9, 2007:  
 “Lake Powell pipeline myth” - Spectrum guest op-ed (Bruce Wilson, author of “Disarming the Culture War” and Washington City resident)

August 2007:  
 “Roadrunner swallowing an elephant? The Lake Powell pipeline is too expensive” – Spectrum guest op-ed Lin Alder

January 31, 2008:  
 “Is the Lake Powell Pipeline necessary?” – Hurricane Valley Journal

January 17, 2008:  
 “Washington County Opponent: Pipeline plan has its perils” – Salt Lake Tribune (Mark Havnes)

January 16, 2008:  
 “Proposed Lake Powell pipeline meets with opposition” – Salt Lake Tribune (Mark Havnes)

February 10, 2008:  
 “Will there be water?” – Spectrum editorial by the Editor

February 23, 2008:  
 “Lake Powell pipeline: Would it support our principles?” – Spectrum guest op-ed (Paul Van Dam, former Utah attorney general, Ivins resident)

March 20, 2008:  
 “Voter initiative is needed on water” – Spectrum LTE (Ray Kuehne, St. George resident)

March 13, 2008:  
 “Group challenges pipeline” – Spectrum (Bob Hudson)

April 1, 2008:  
 “Critics of 139-mile line bring up questions of climate change, noting that supply may dry up” – Salt Lake Tribune (Mark Havnes)

April 3, 2008:

“Pipeline concerns heard: Biology students organize forum for opinions” – University Journal (Samantha Arnold)

April 28, 2008:  
 “Public should vote on new pipeline” – LTE (Waid Reynolds, St. George)

August 12, 2008:  
 “What Democracy?” – Spectrum op-ed (Paul Van Dam) the public should have a say in the building of the Lake Powell Pipeline.

November 13, 2008:  
 “Powell Pipeline: It’s time to listen to market forces” – Spectrum guest op-ed (Paul Van Dam, former Utah attorney general, Ivins resident)

December 4, 2008 :-  
 “Economic downturn raises questions about pipeline” – Spectrum guest writer group (Eric de Vita)

March 30, 2009:  
 “We need more disclosure on expensive pipeline” – Spectrum guest editorial (Rick Evertsen, resident and real estate broker)

January 4, 2010:  
 “Residents fear cost of possible Lake Powell Pipeline” – Salt Lake Tribune (Mark Havnes)

January 5, 2010:  
 “Pipeline debate fills lecture hall” - Spectrum (Brian Ahern)

January 6, 2010:  
 “Desert mirage: Powell pipeline is an impractical idea” – Salt Lake Tribune (editorial)

January 7, 2010:  
 “Put pressure on officials over proposed Lake Powell pipeline” – Spectrum & Daily News writers group (Don Triptow)

January 28, 2010:  
 “Stop the Lake Powell pipeline” – LTE (Lisa Rutherford, Ivins)

January 6, 2011:  
 “Water projects require some careful review and discussion” – Spectrum guest op-ed (Paul Van Dam, former Utah attorney general and Ivins Resident)

March 30, 2011:  
 “Pipeline update meeting long on details, short on answers” – Spectrum writers group (Lisa Rutherford)

April 9, 2011:  
 “Lake Powell Pipeline” – Salt Lake Tribune Editorial

May 5, 2011:  
 “People should get to vote on pipeline” – LTE (Jim Rowles, Central)

May 17, 2011:  
 “We need better information about the Lake Powell pipeline” – Spectrum guest writer group (Ray Kuehne)

May 2011:  
 “Taxpayer of Washington County, wake up” – Spectrum LTE (Waid Reynolds, St. George resident) on the cost of Lake Powell Pipeline

June 22, 2011:  
 “Water district continues to spend money on flawed project” – Spectrum writers group (Lisa Rutherford)

August 17, 2011:  
 “Pipeline could resemble other areas’ mistakes” – Spectrum LTE (Jim Rowles, Central resident)

September 8, 2011:  
 “Washington County can learn from Alabama’s mistake – Spectrum writers group (Eric de Vita)

September 21, 2011:  
 “Powell pipeline faces funding skeptics” – Salt Lake Tribune (Brandon Loomis)

September 24, 2011:  
 “Don’t Soak Utahns” - Salt Lake Tribune Editorial

September 15, 2011:  
 “Never mind the pipeline; where is today’s water going” – Spectrum guest writer group (Don Triptow)

October 9, 2011:  
 “We need honest estimate of what pipeline will cost” – LTE (Doug Williams, St. George)

October 6, 2011:  
 “Area should get by on existing water supply” – LTE (Steve Martin, Washington City)

October 30, 2011:  
 “Pipeline price tag: The cost of the Lake Powell pipeline has become a controversial topic” – Spectrum editorial (Todd Seifert, editor) There is no doubt that taxpayers would shoulder the load of paying off the huge debt.

December 7, 2011:  
 “Politics of water affect all of us” – Spectrum writers group (Lisa Rutherford)

November 17, 2011:  
 “In Our View: Pipeline funding” – Spectrum editorial (Todd Seifert, editor)

November 27, 2011:  
 “No water to pump” – Salt Lake Tribune LTE (David Folland, Sandy resident)

November 23, 2011:  
 “The Lake Powell Pipeline continues to polarize” – St. George News (Mori Kessler)

February 22, 2012:  
 “Put possible costs of Lake Powell pipeline in perspective” – Spectrum LTE (Terry Wenstrand, Santa Clara)

February 15, 2012:  
 “A new way to look at pipeline” – Spectrum writers group (Ray Kuehne) growth will pay for the Lake Powell Pipeline

February 10, 2012:

“Water district using scare tactics to push through pipeline” – Spectrum LTE (Dave Kerlin, Ivins resident)

March 6, 2012:

“Area can learn from Tucson” – Spectrum writers group (Lisa Rutherford, Ivins resident)

March 7 2012:

“Proposed Lake Powell Pipeline is bad bet for Utah taxpayers” – Deseret News (Sharlene Leurig and Peter Metcalf)