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RECLAMATION

Lake Powell Pipeline Project Draft Environmental Impact Statement Public Scoping Report

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ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
BIA	U.S. Department of the Interior, Bureau of Indian Affairs
BLM	U.S. Department of the Interior, Bureau of Land Management
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CSU	Conserve Southwest Utah
CWA	Clean Water Act
EIS	Environmental Impact Statement
ESA	Endangered Species Act of 1973
FERC	U.S. Federal Energy Regulatory Commission
FLPMA	Federal Land Policy and Management Act
USFWS	U.S. Department of the Interior, Fish and Wildlife Service
GIS	Geographic Information System
HDD	horizontal directional drilling
HCP	habitat conservation plan
Interior	U.S. Department of Interior
ITA	Indian Trust Assets
KCWCD	Kane County Water Conservancy District
LPP	Lake Powell Pipeline Project
MST	Mountain Standard Time
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NLCS	National Landscape Conservation System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPS	U.S. Department of the Interior, National Park Service
Proposed Project	Lake Powell Pipeline Project
Reclamation	Bureau of Reclamation
RMP	BLM Arizona Strip Resource Management Plan
ROD	Record of Decision
ROW	right of way
Tribe	Kaibab Band of Paiute Indians
T&E	Threatened and Endangered
UBWR	Utah Board of Water Resources
UDWRe	Utah Division of Water Resources
U.S.	United States
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
WCWCD	Washington County Water Conservancy District
WSA	wilderness study area

1 Introduction

In 2008, the Utah Board of Water Resources (UBWR) submitted a proposal for the Lake Powell Pipeline (LPP) Project with an intake at Lake Powell that included a hydroelectric peaking station and a future pumped storage system at Hurricane Cliffs, Utah to the Federal Energy Regulatory Commission (FERC). After a lengthy process with many delays, and with UBWR's decision to remove the peaking unit and pumped storage components from the LPP Project, UBWR decided to withdraw its application to the FERC on September 25, 2019. The Project was terminated effective October 10, 2019. The UBWR then submitted an application to the Department of the Interior (Interior), as the lead federal agency for the National Environmental Policy Act (NEPA) review of the LPP Project. Reclamation's Provo Area Office is now the designated lead for the LPP Project's NEPA process. Ultimately, the Secretary of the Interior will decide whether to approve the LPP Project.

Based on the changes to the project design and with a new lead federal agency, Reclamation initiated a new public scoping process, which requested that interested parties submit comments on the current LPP Project proposal and input on alternatives to be analyzed in the Draft Environmental Impact Statement (EIS). The Department of the Interior, through Reclamation, issued a Notice of Intent (NOI) to prepare an EIS for the LPP Project on December 6, 2019. The 35 day scoping period began with issuance of the NOI and ended on January 10, 2020.

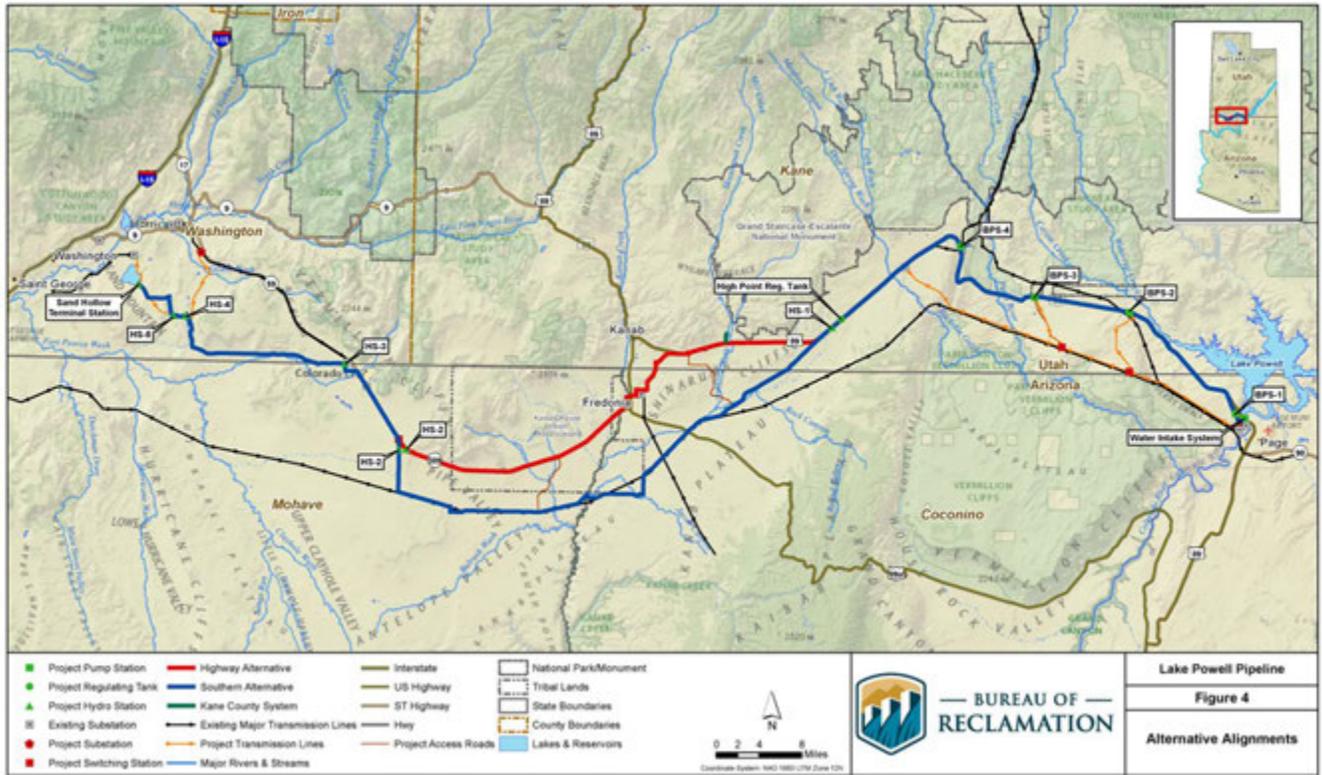
In the NOI, Reclamation invited entities with jurisdiction by law or special expertise to be Cooperating Agencies. The NOI also contained information on the three public scoping meetings that were held on January 7-9, 2020. Finally, Reclamation provided a summary of two alternatives previously considered under FERC's process (described below) and requested input from interested parties on the previous alternatives, potential new alternatives, and any additional issues to be analyzed in the Draft EIS. Copies of all scoping notifications, press releases, paid newspaper advertisements, and meeting materials and handouts, are included in Appendix A.

1.1 Project Summary

As proposed, the LPP Project would be a water delivery pipeline that would begin at Lake Powell near Glen Canyon Dam in Page, Arizona and end at Sand Hollow Reservoir near St. George, Utah. Two pipeline alignments have been proposed: The Southern Alternative and the Highway Alternative (Figure 1). Both alternatives begin and end in the same location. The Southern Alternative would travel south of the Kaibab Indian Reservation, while the Highway Alternative would cross lands held in trust by the United States for the benefit of the Kaibab Band of Paiute Indians, following Arizona State Route 389.

The Southern Alternative would cross land administered by the Bureau of Land Management (BLM) in Utah and Arizona and would require multiple right-of-way (ROW) grants and an amendment to the Arizona Strip Field Office Resource Management Plan (RMP). Three alternatives for amending the RMP, plus a No Action alternative, are being considered based on scoping conducted by the BLM in 2018. Each alternative would resolve conflicting management direction between the RMP and the LPP Project. In addition, UBWR has requested a water exchange contract with Reclamation.

Figure 1. Alternative alignments being considered.



1.2 Purpose of Scoping

NEPA requires public involvement in determining the scope of the EIS analysis. The public involvement process is designed to contribute to an exchange of constructive ideas, discussion of alternatives, and determination of possibilities for mitigating potential environmental impacts associated with the proposed LPP Project. Reclamation recognizes that public involvement is more than just information gathering and should be considered a “value-added” process. Reclamation plans to inform and involve members of the public so they can effectively participate in the LPP project NEPA process.

1.3 Cooperating Agencies

Reclamation requested that the following agencies participate in the process as Cooperating Agencies, as defined by 40 CFR 1508.6, due to the agency’s special expertise or jurisdictional authority relevant to the project:

- Bureau of Indian Affairs
- Bureau of Land Management
- Kaibab Band of Paiute Indians
- National Park Service
- U.S. Fish and Wildlife Service

2 Scoping Process

2.1 Scoping Notifications

A NOI to prepare an EIS and Notice of Public Scoping Meetings for the proposed LPP Project were published in the *Federal Register* on December 6, 2019, indicating the start of the scoping period. The NOI also identified the times and locations for the three public scoping meetings held on January 7-9, 2020 (Table 1). The scoping period ended at midnight on January 10, 2020. Copies of all scoping notifications can be found in Appendix A.

Table 1. Public Scoping Meeting Locations

Meeting Location	Address	Date/Time
The Kanab Center	20 N. 100 E. Kanab, UT 84741	January 7, 2020 6:00 – 8:00pm
The Dixie Center	1835 S Convention Center Dr St. George, UT 84790	January 8, 2020 6:00 – 8:00pm
Valley High School	325 W. 11000 S. South Jordan, UT 84095	January 9, 2020 6:00 – 8:00pm

2.1.1 Legal Notice and Press Releases

Reclamation issued a news release in association with the NOI on December 6, 2019. The news release included contact information for media inquiries and to obtain project information. A media advisory was also issued prior to the public scoping meetings in January 2020.

2.1.2 Scoping Meeting Post Card

A postcard scoping notice describing the proposed project and inviting members of the public to participate in public scoping was mailed to 378 people based on the project mailing list compiled from the prior FERC-based project on December 9, 2019.

2.1.3 Newspaper Ads

Newspaper notices were published as paid display advertisements prior to the public scoping meetings (see Appendix A). The notice ran twice in each newspaper 15 days prior to the meetings and during the week prior to the meetings (Table 2).

Table 2. Print media outlets and dates of the newspaper notices

Newspaper	Publication Dates
Desert News	December 23 and January 6
St. George Spectrum	December 23 and January 6
Southern Utah News	December 19 and January 2

2.2 Public Scoping Meetings

The purpose of public scoping is to identify issues, needs, and concerns of stakeholders, special-interest groups, and the general public, as well as to inform alternative development. Copies of the public scoping meeting materials are included in Appendix B.

2.2.1 Meeting Format and Locations

The public scoping meetings (Table 1) were held in the evening from 6:00 to 8:00 pm Mountain Standard Time (MST) following the agency scoping meetings (Section 2.3). The public scoping meetings began in an open house format, including posters about the proposed LPP Project, the decision-making process, and how to get involved, followed by a project presentation given by Reclamation. The presentation provided information about the proposed LPP Project and the NEPA process. Two court reporters were available at the scoping meetings to transcribe verbal comments from the public. Participants were encouraged to submit all comments in writing by the close of the scoping comment period on January 10, 2020. Participants were able to provide written comments in one of the following ways: 1) via comment forms that were available at the scoping meetings; 2) via email and/or email attachments; 3) via fax; and/or 4) via any other form of mail. The presentation, posters, handouts, and blank comment forms from the public meetings were also made available on the project website.

2.2.2 Scoping Meeting Attendance

A total of 241 people (not including agency staff or Reclamation’s contractors) signed into the public scoping meetings (Table 3).

Table 3. Public Scoping Meeting Attendance

Meeting Location	City	Number of Attendees
The Kanab Center	Kanab, UT	58
The Dixie Center	St. George, UT	158
Valley High School	Jordan, UT	25
Total Attendees		241

2.3 Agency Scoping Meetings

Reclamation invited potentially affected federal, state, tribal, and local agencies to agency only meetings held prior to each public meeting on the same dates and at the same locations (Table 1). The meetings began at 1:00 pm MST and ended at 2:30 pm MST. The agency scoping meetings provided agencies with an opportunity to discuss specific issues, opportunities, and local regulatory requirements with Reclamation. The agency scoping meetings included a presentation, a question-and-answer period, and a discussion on alternatives and issues. The agencies also discussed project roles and responsibilities as well as opportunities for participation, including cooperating agency status and working groups process.

2.3.1 Agency Scoping Meeting Attendance

A total of 32 agency personnel (not including Reclamation, or Reclamation’s contractors) signed into the agency scoping meetings (Table 4).

Table 4. Agency Scoping Meeting Attendance

Meeting Location	City	Number of Attendees
The Kanab Center	Kanab, UT	6
The Dixie Center	St. George, UT	25
Springhill Suites	Jordan, UT	1
Total Attendees		32

3 Scoping Comment Analysis

3.1 Scoping Comment Summary

During the public scoping period, 1,125 comment submissions were received, of which 643 (57 percent) were attributed to three separate form letters. Examples of each form letter are included in Appendix D. The remaining 482 (43 percent) submissions were determined to be unique and classified as substantive, non-substantive, or transcript. Each submission was assigned a unique identifying number, grouped by type of stakeholder (*i.e.*, federal and state agencies, organization, individual, etc.), and segmented by primary comment issue. Comment submission types are summarized in Table 5.

Table 5. Comment Submission Types

Submission Type	Submission Count
Form Letter 1 - Cancel Pipeline	615
Form Letter 2 - Conserve SW UT Org Bullet List	22
Form Letter 3 - Colorado River Crisis	6
Total Form Letter Submissions	643
Non-substantive Comments	360
Substantive Comments	116
Transcripts ¹ (verbal comments collected at meetings)	6
Total Unique Submissions	482
Total Submissions	1,125

1. Transcripts are verbal comments collected by court reporters during public scoping meetings.

Each of the 482 unique submissions were evaluated and broken down into individual comment segments. From the 482 unique, non-form letter and transcript submissions, 1,307 comment segments were identified and categorized by issues of concern. A breakdown of these segments is shown in Table 6.

Table 6. Unique Submission Comment Segment Breakdown by Issue

Issue	Count of Comment Segments from Submissions ¹	
	Non-substantive	Substantive ²
Air Quality		4
Alternatives	47	114
Aquatic Invasive Species	12	30
Areas of Critical Environmental Concern (ACEC)	1	4
Baseline Effects		1
Biological Resources	3	22
Climate Change and GHGs	10	43
Cultural Resources	3	12
Cumulative Impacts	3	17
Electric and Magnetic Fields	3	4
Environmental Justice	1	4
Fisheries		2
General	30	28
Geological Resources		1
Hazardous Materials		1
Impacts	1	5
Lands and Realty	3	4
Lands with Wilderness Characteristics		1
Mitigation	1	14
National Trails		4
Native American Concerns		8
NEPA Process	8	42
Noise and Vibration		2
Opinion - For Proposed Lake Powell Pipeline	33	3
Opinion - Opposed to Proposed Lake Powell Pipeline	203	14
Other	27	41
Public Health and Safety		5
Purpose and Need	8	24
Recreation	1	4
Renewable Energy		2
Request for Extended Comment Period	5	3
Request for Shapefiles or Maps	1	1
Seismic Activity		1
Socioeconomics	13	52
Soil Resources		2
Special Status Species		7
T&E Species	3	21
Transportation		1
Travel Management		2
Visual Resources	6	17

Issue	Count of Comment Segments from Submissions ¹	
	Non-substantive	Substantive ²
Water Law	8	64
Water Resources	21	68
Water Supply	44	99
Wilderness		1
Wildlife	2	7
Grand Total	501	806
<p>1. Unique submissions are broken down into comment segments, therefore each submission has the potential to produce several comment segments. It is not unusual for the number of comment segments identified to be greater than the number of submissions received during the scoping process.</p> <p>2. Only substantive comment segments were taken from verbal comments (transcripts) therefore the counts of substantive comments taken from transcripts have been added to the substantive comment segments.</p>		

3.2 Methodology for Processing Scoping Comments

In order to process the comments, the Reclamation NEPA team utilized a proprietary database for the collection and analysis of comment submittals. The database makes use of an online system in which comments are collected via email, mail, hard copy, court reporter transcripts, or fax, converted to a portable document file (PDF), and entered into an internal database. Verbal comments were collected by court reporters during the public scoping meetings; the court reporters created PDF transcripts of the verbal comments. These transcripts were then entered into the database.

The Reclamation NEPA team reviewed each comment submittal in the database and identified unique comment segments within each submittal. For the purpose of this discussion, comment segments are sections of a larger submittal that specifically discuss individual issues and/or topics of concern (e.g., air quality, land use planning, etc.). Comment submissions are segmented in this way to ensure all issues and/or topics of concern found in each submittal are addressed. It also ensures that each comment receives the appropriate response from the correct technical specialist.

The Reclamation NEPA team identified each of the comments as either substantive or non-substantive. Guidance from the Bureau of Land Management (BLM) National Environmental Policy Act Handbook (2008) was followed in this classification of the comments. According to the 2008 BLM Handbook, unique and substantive comments are defined as being specific and doing one or more of the following:

- Questioning, with reasonable basis, the accuracy of information in the NEPA document;
- Questioning, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis;
- Presenting new information relevant to the analysis;
- Presenting reasonable alternatives other than those analyzed in the NEPA document; and/or
- Causing changes to or revisions of the alternatives (BLM 2008).

In contrast, non-substantive comments simply state a position in favor of, or against, an alternative or proposed management action; agree or disagree with a policy or proposal; provide information not directly related to the issues or impact analyses, or otherwise express a personal preference or opinion unsupported by data (BLM 2008).

Members of the Reclamation NEPA team first evaluated whether a comment submittal was unique and substantive, unique and non-substantive, or a form letter (i.e. not unique). If the comment was noted as unique and substantive, the comment submittal was segmented into individual comments by issue category. Each comment segment was given an individual identifier that could be referenced in the comment matrix and correlated to a PDF copy of the comment.

Reclamation also reviewed and considered all non-substantive comments (i.e., unique and non-substantive and form letter comments) received. These comments were reviewed in order to provide the Reclamation NEPA team with additional context regarding public opinions and thoughts regarding the proposed LPP Project.

3.3 Scoping Comments by Issue Category and Affiliation

Comments were submitted by individuals representing organizations or as collective comments of a group. Among these were state and local governments and non-governmental organizations (NGOs). A total of 36 organizations were identified as submitting at least one unique comment. These include, but are not limited to the following, Arizona Department of Water Resources, City of Saint George, Colorado River Commission, Desert Tortoise Council, Living Waters, and San Juan Southern Paiute Tribe.

3.4 Summary of Scoping Comments by Issue Category

Each of the 482 unique submissions were read and segmented into comments addressing one of the 46 issue categories noted herein (Sections 3.4.1 – 3.4.37). The comment segments were assigned to an issue category based on their identified primary concern. If more than one issue category could be identified in the segment, the segment was assigned the issue category that was most relevant to the comment segment. Unique comment segments can be found in Appendix C.

3.4.1 Air Quality

Four comments were received concerning air quality. The commenters were primarily concerned with vehicle and construction air pollution and requested a National Ambient Air Quality Standard (NAAQS) assessment.

3.4.2 Alternatives

A total of 114 comments were received concerning the Proposed Project alternatives. The comments primarily concerned utilizing a water conservation alternative; this included suggestions for limiting irrigation of lawns and golf courses which they purport would make the pipeline unnecessary.

3.4.3 Areas of Critical Environmental Concern (ACEC)

Four comments concerning Areas of Critical Environmental Concern (ACEC) were submitted as part of the scoping process. The comments addressed the protection of the Kanab Creek ACEC and possible negative effects associated with the construction and operation of the Proposed Project.

3.4.4 Baseline Effects

Only one comment was received addressing baseline effects. This comment described the need for updating environmental protections and water projections.

3.4.5 Biological Resources

A total of 50 comments were deemed substantive regarding biological resources. Many of the commenters requested a detailed analysis of impacts on aquatic and wildlife resources.

3.4.5.1 Special Status Species

Seven comments addressed special status species. Many of these commenters noted a concern for special status plants in the LPP Project area, as well as the possibility of identifying additional at-risk species.

3.4.5.2 Threatened and Endangered Species

A total of 21 comments were received addressing threatened and endangered species. The commenters were primarily concerned with how the pipeline would affect any threatened and endangered species in the surrounding LPP Project area. Many some commenters noted a concern for protection of the desert tortoise and the Red Cliffs Desert Preserve, which could be affected by a different unrelated concurrent project.

3.4.5.3 Fisheries

Two comments addressed fisheries. They both noted concerns of how the local fisheries would be affected by the proposed LPP Project through the alteration of altering food web, algal blooms, and changes in water quality.

3.4.5.4 Aquatic Invasive Species

Thirty comments were received concerning aquatic invasive species. Many of the comments focused on invasive quagga mussels and their possible infestation of the water supply.

3.4.6 Climate Change and Greenhouse Gases

A total of 43 comments addressed climate change and greenhouse gases. The comments were primarily related to what the short and long-term effects of the water supply would be and how the river flow could be affected by the proposed LPP Project.

3.4.7 Cultural Resources

Twelve comments addressed cultural resources. Many of the commenters were primarily concerned with the protection of sacred sites, burial sites and other culturally valuable assets.

3.4.8 Cumulative Effects

A total of 17 comments were received regarding cumulative effects. The commenters were primarily concerned with population growth and sprawl, as a result of the pipeline and a larger availability to water resources/supply.

3.4.9 Electric and Magnetic Fields

Four comments addressed electric and magnetic fields. Many of the commenters addressed concerns about the placement of electrical lines near the Dixie Springs development and any possible human health concerns and impacts on the natural landscape.

3.4.10 Environmental Justice

Four comments were received regarding environmental justice. The comments primarily addressed concerns over the increase in taxes and water costs to the residents in the region and whether the remainder of the state will contribute to the costs.

3.4.11 General Comments

As part of the scoping process, 28 comments were received and were categorized as general. Many of the commenters expressed concerns about irrigation and farmland; others wanted to be added to the contact list in order to be updated on the proposed LPP Projects progress.

3.4.12 Geological Resources

One unique, substantive comment was received that addressed geological resources. The commenter requested a full analysis of the geological structures from Flaming Gorge to Sand Hollow Reservoir to better understand the potential effects of the proposed LPP Project on the Green and Colorado rivers.

3.4.13 Hazardous Materials

One comment expressed concerns regarding hazardous materials. The comment text noted a concern about the addition of chemicals into the Colorado river system and any associated negative impacts from this action.

3.4.14 Impacts

Five comments addressing the general category of impacts. These commenters expressed concern over the powerlines proposed to be constructed through the Dixie Springs development and property diminution that may occur as a result of the proposed LPP Project.

3.4.15 Lands and Realty

Three comments addressed lands and realty. The commenters noted an interest in the location of the intake facilities due to their location within the boundaries of the Glen Canyon National Recreation Area. The stakeholders wanted to ensure the protection of the area and that regulatory mandates would be upheld.

3.4.16 Lands with Wilderness Characteristics

One comment was submitted regarding lands with wilderness characteristics. The commenter requested maps with further detail near any Wilderness Study Areas and information regarding how those lands would be impacted by the proposed LPP Project.

3.4.17 Mitigation

Fourteen comments were received regarding mitigation. Many of the commenters requested a detailed plan to minimize and mitigate impacts during construction, operation, and maintenance.

3.4.18 National Trails

Four comments were submitted pertaining to national trails. The commenters addressed the need to follow federal guidelines on how to proceed with projects that are adjacent to or run through national trails to ensure their integrity and preservation.

3.4.19 Native American Concerns

Eight comments addressed Native American concerns. Some of the commenters expressed their concerns with water supply and the water rights of tribes in the region. By transporting water away from the area, the stakeholders are concerned with availability of water for those tribal communities.

3.4.20 NEPA Process

As part of the scoping process, a total of 42 comments were received that addressed the NEPA process. Many of the commenters requested an update to the Federal Energy Regulatory Commission's (FERC) studies with findings that include climate change, water projections, and population growth. The comments showed a concern for using outdated studies, which may misguide decision-making.

3.4.21 Noise and Vibration

Among the substantive comments received, two comments addressed noise and vibration. The commenters were primarily concerned with increased noise and vibration on wildlife throughout the pipeline corridor and how the construction and operation of the proposed LPP Project will affect migration and reproduction.

3.4.22 Proposed Project Cost (Other)

A total of 41 comments were received that addressed proposed LPP Project costs. Many of the commenters were concerned with the cost of the proposed LPP Project to taxpayers and the overall cost of the proposed LPP Project. Several questioned whether residents of Washington and Kane County would fund the proposed LPP Project, or if the entire state would provide funds. Additionally, many suggested that a water conservation alternative would save taxpayer money and avoid the proposed LPP Project altogether.

3.4.23 Public Health and Safety

Five comments addressed public health and safety in their submittals. Several comments described a concern for where fill for the proposed LPP Project would be sourced and if it would contain any chemical contaminants.

3.4.24 Purpose and Need

Among the comments received, 24 addressed the purpose and need of the EIS. Many of the commenters felt that the proposed LPP Project did not have a clear purpose and need and would like more details on the amount of water to be conveyed and cost of the proposed LPP Project overall.

3.4.25 Recreation

As part of the scoping process, four comments were received regarding recreation. Many commenters addressed concern for the quality of the recreational land and its remoteness from other infrastructure and worried that with a large pipeline, some of the integrity of the area will be lost. Additionally, the general area in which the proposed LPP Project would be located attracts many tourists, and the commenters expressed concerns that a large-scale construction effort would detract from tourism and thus lead to economic losses.

3.4.26 Renewable Energy

Two comments addressed renewable energy. The commenters expressed concern that the removal of water from the reservoir would diminish the capability to generate renewable energy.

3.4.27 Request for Extended Comment Period

A total of three comments were received addressing a request for an extended comment period. Both commenters addressed concern that the comment period was 30 days and over the holiday season, possibly limiting public engagement.

3.4.28 Request for Shapefiles or Maps

One comment requested shapefiles or maps to have a more detailed view of the two proposed routes for the pipeline.

3.4.29 Seismic Activity

Among the substantive comments, one addressed seismic activity. The commenter expressed concern about seismic activity along the Hurricane Fault and its associated effects on the proposed LPP Project.

3.4.30 Socioeconomics

Among the substantive comments, a total of 52 comments were received regarding socioeconomics. The commenters addressed the total cost of the proposed LPP Project and how long the repayment plan would be for residents and the state.

3.4.31 Soil Resources

Two comments were received regarding soil resources. The comments primarily described concerns with soil disturbance during construction and maintenance, especially regarding the impacts to biological crusts found in this area and the possibility of invasive plants colonizing from loss of soil stability.

3.4.32 Transportation and Travel Management

Three commenters addressed transportation in their scoping submittals. The commenters were concerned about travel delays to and from Kanab and to other cities in the general proposed LPP Project area due to construction.

3.4.33 Visual Resources

A total of 17 comments were received addressing visual resources. Many of the commenters addressed concerns about the proposed powerline near Dixie Springs and how that would impact the visual resources of the surrounding landscape.

3.4.34 Water Law

A total of 64 comments were received addressing water law and water rights of other states and tribes. Many commenters addressed concerns over watersheds and water rights of the upper and lower basins and the security of Utah's water claims in their submittals.

3.4.35 Water Resources

Among the substantive comments received, 68 addressed potential negative effects water resources including groundwater and water quality. Many of the commenters expressed concern about water usage including over-irrigation, low water prices, and lack of desert landscaping for businesses and homes. Others expressed concerns regarding the many streams and springs the proposed LPP Project would cross and how the proposed LPP Project would affect the water quality.

3.4.36 Water Supply

Among the substantive comments, 99 addressed water supply and availability. Commenters were concerned with the long-term availability of water from the Colorado River with the onset of climate change, as well as the use of reclaimed water and rainwater for landscaping and irrigation.

3.4.37 Wilderness

One substantive comment addressed wilderness. The commenter expressed concern that the building of the pipeline would negatively impact the pristine land, even if the pipeline travelled along the highway corridor. The commenter noted that the area is arid and slow growing, making any remedial efforts difficult and time intensive.

3.4.38 Wildlife

Seven of the substantive comments addressed wildlife. The commenters primarily expressed their concerns for the protection of the desert tortoise and other at-risk species, along with the impacts the pipeline would have on them. A request for breeding bird surveys in the area was received by a commenter in order to better understand any effects on avian species.

3.4.39 Summary of Comments

Of the 806 substantive comment segments identified, most commenters addressed alternatives to the proposed LPP Project, such as conservation efforts. They also expressed concern over aquatic invasive species and impacts on threatened or endangered species. Many addressed the cost of the proposed LPP Project and who would fund it and whether water prices would increase in the region. Several addressed concern for the water supply and its availability to specifically to tribes and animals, but also the overall population and how this proposed LPP Project would impact the rivers and streams. Overall, many commenters expressed their opposition to the proposed LPP Project due to the potential natural and socio-economic impacts that could occur as a result of the proposed LPP Project.

4 References

Bureau of Land Management (BLM). 2008. *National Environmental Protection Act Handbook – Handbook H-1790-1* Washington, D.C. Accessed January 28, 2020 at: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_Handbook_h1790-1.pdf.

Appendices

Appendix A

Scoping Notifications

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Notice of Intent



ADDRESSES: Comments may be sent via U.S. Postal Service and all other carriers to the National Register of Historic Places, National Park Service, 1849 C St. NW, MS 7228, Washington, DC 20240.

SUPPLEMENTARY INFORMATION: The properties listed in this notice are being considered for listing or related actions in the National Register of Historic Places. Nominations for their consideration were received by the National Park Service before November 9, 2019. Pursuant to Section 60.13 of 36 CFR part 60, written comments are being accepted concerning the significance of the nominated properties under the National Register criteria for evaluation.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Nominations submitted by State Historic Preservation Officers:

FLORIDA

Miami-Dade County

Barry University Historic District, 1300 NE Second Ave., Miami Shores, SG100004782

GEORGIA

Spalding County

Milner-Walker House, 708 South Hill St., Griffin, SG100004786

MICHIGAN

Genesee County

City of Flint Municipal Center, 1101 Saginaw St., 210 East Fifth St., 310 East Fifth St., Flint, SG100004775

NEW YORK

Erie County

Boarding House at 72-74 Sycamore Street, 72 Sycamore St., Buffalo, SG100004805

Monroe County

Polvino Building, 216 Central Park, Rochester, SG100004804

Montgomery County

Amsterdam Free Library, 28 Church St., Amsterdam, SG100004800

Rockland County

Pousette-Dart, Richard, House and Studio, 932 Haverstraw Rd., Suffern vicinity, SG100004802

Schuyler County

First Presbyterian Church of Watkins Glen, 520 North Decatur St., Watkins Glen, SG100004801

Wayne County

Clyde Downtown Historic District, Portions of Glasgow St., Caroline St., Columbia St., Sodus St., North & South Park Sts. & West Genesee St., Clyde, SG100004803

NORTH CAROLINA

Bertie County

Colerain Historic District, North & West Academy Sts., Britton St., Cedar St., Glover St., North & South Main Sts., East & West River Sts. & Winton St., Colerain, SG100004797

Forsyth County

Evergreen Farm, 2532 Jonestown Rd., Winston-Salem, SG100004796

Montgomery County

Mount Carmel Presbyterian Church and Cemetery, 1367 Clayton Carriker Rd., Norman, SG100004795

Northampton County

Warren Place, 925 Willis Hare Rd., Pendleton vicinity, SG100004792

Richmond County

Mount Carmel Presbyterian Church and Cemetery, 1367 Clayton Carriker Rd., Norman, SG100004795

Surry County

Ridge Westfield Elementary School, 4416 Westfield Rd., Mount Airy vicinity, SG100004794
Graves, Ben and Barbara, House, 309 Fairview Ave., Mount Airy, SG100004799

Vance County

Morgan, Thomas A., Farm, 1471, 1473 & 1475 Morgan Rd., Townsville vicinity, SG100004798

Wake County

St. Ambrose Episcopal Church, 813 Darby St., Raleigh, SG100004791
Oakwood Cemetery, 701 Oakwood Ave., Raleigh, SG100004793

OHIO

Cuyahoga County

Myrtle-Highview Historic District, 16209 to 16408 Highview Dr. & 16200 to 16409 Myrtle Ave.; Roughly bounded by Lee Rd., Myrtle Ave., Highview Dr. & dead end., Cleveland, SG100004778

Lucas County

Landers Brothers Company Building, 443 10th St., Toledo, SG100004779
Overmyer Building, The, 15 South Ontario St., Toledo, SG100004780

Marion County

Marion Women's Club, 1126 East Center St., Marion, SG100004781

RHODE ISLAND

Providence County

Moore Fabric Company Plant, 45-47 Washington St., Pawtucket, SG100004785

Washington County

Wakefield Historic District (Boundary Increase), Mains St., High St., Robinson St.,

Wright Ave., South Kingstown, BC100004777

WASHINGTON

King County

Freeway Park, 700 Seneca St., Seattle, SG100004789

Skagit County

Fraternal Order of Eagles Hall-Anacortes, 901 Seventh St., Anacortes, SG100004790

Spokane County

Bleeker, Harry and Catherine, House, 1707 North West Point Rd., Spokane, SG100004787
Warner, William and Ella, House, 2627 South Manito Blvd., Spokane, SG100004788

Additional documentation has been received for the following resource:

RHODE ISLAND

Washington County

Wakefield Historic District (Additional Documentation), Roughly, Main St. from Belmont Ave. to Columbia St., South Kingstown, AD96000572

Authority: Section 60.13 of 36 CFR part 60. Dated: November 12, 2019.

Julie H. Ernstein,

Supervisory Archeologist, National Register of Historic Places/National Historic Landmarks Program.

[FR Doc. 2019-26328 Filed 12-5-19; 8:45 am]

BILLING CODE 4312-52-P

DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

[RR04963000, XXXR0680R1, RR.17549661.10000000]

Notice of Intent To Prepare a Draft Environmental Impact Statement and Public Scoping Period for the Lake Powell Pipeline Project

AGENCY: Bureau of Reclamation, Upper Colorado Basin, Interior Region 7.

ACTION: Notice of intent; request for scoping comments.

SUMMARY: The Bureau of Reclamation (Reclamation) intends to prepare an Environmental Impact Statement (EIS) on the Lake Powell Pipeline (LPP) Project. Reclamation is requesting public scoping comments to identify significant issues or other alternatives to be addressed in the EIS.

DATES: Submit comments on or before January 10, 2020.

Three scoping meetings will be held during the scoping period from 6:00 p.m. to 8:00 p.m. on January 7-9, 2020.

ADDRESSES: Provide written scoping comments and requests to be added to the mailing list to Mr. Rick Baxter,

Program Manager, Bureau of Reclamation, Provo Area Office, 302 East Lakeview Parkway, Provo, UT 84606; via submittal form at <https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>; or email lpp@usbr.gov.

The three scoping meetings will be held at the following locations:

January 7, 2020—Kanab Center, 20 North 100 East, Kanab, Utah 84741
January 8, 2020—Dixie Center, 1835 South Convention Center Dr., St. George, Utah 84790
January 9, 2020—Valley High, 325 West 11000 South, South Jordan, Utah 84095

FOR FURTHER INFORMATION CONTACT: Mr. Rick Baxter, Program Manager, Bureau of Reclamation, Provo Area Office, 302 East Lakeview Parkway, Provo, UT 84606; telephone (801) 379-1078; facsimile (801) 379-1159; email lpp@usbr.gov. Persons who use a telecommunications device for the deaf may call the Federal Relay Service (FedRelay) at 1-800-877-8339 TTY/ASCII to contact the above individual during normal business hours or to leave a message or question after hours. You will receive a reply during normal business hours. Information on this project may also be found at: <https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>.

SUPPLEMENTARY INFORMATION: Reclamation is issuing this notice pursuant to the National Environmental Policy Act of 1969, as amended (NEPA), 42 U.S.C. 4321 *et seq.*; the Council on Environmental Quality's regulations for implementing NEPA, 40 CFR parts 1500 through 1508; Department of the Interior's NEPA regulations, 43 CFR part 46; and Bureau of Land Management regulations at 43 CFR 1610.2.

Background

Reclamation will prepare an EIS for the LPP Project as proposed by the Utah Board of Water Resources (UBWR). The LPP is a proposed 140-mile, 69-inch-diameter water delivery pipeline that begins at Lake Powell near Glen Canyon Dam in Page, Arizona, and ends at Sand Hollow Reservoir near St. George, Utah. The pipeline would deliver up to 86,249 acre-feet of water from Lake Powell to Sand Hollow Reservoir. UBWR proposes building the LPP in order to bring a second source of water to Washington and Kane Counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability.

UBWR previously proposed a pipeline project with an intake at Lake Powell that included a hydroelectric

peaking station at Hurricane Cliffs, Utah. The Federal Energy Regulatory Commission (FERC) was the lead Federal agency for that project because it would have required a hydroelectric license issued by the FERC. The UBWR withdrew its application to the FERC on September 25, 2019, and the project was terminated effective October 10, 2019. (https://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191016-3069) Reclamation has been designated the lead Federal agency by the Department for the LPP NEPA process. The Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), Bureau of Indian Affairs (BIA) and National Park Service (NPS) are cooperating agencies. Based on the changes to project design and the lead federal agency, Reclamation is initiating a new public scoping process, which will require interested parties to submit new comments on the current proposal. Reclamation is also reinitiating government to government consultation with Indian tribes under section 106 of the National Historic Preservation Act and in accordance with Executive Order 13175.

Two pipeline alignments have been proposed: The Southern Alternative and the Highway Alternative. Both alternatives begin and end in the same locations. The Southern Alternative would travel south of the Kaibab Indian Reservation while the alignment for the Highway Alternative would cross lands held in trust by the United States for the benefit of the Kaibab Band of Paiute Indians, following Arizona State Route 389. The Southern Alternative would cross land administered by the BLM in Utah and Arizona and would require multiple right-of-way (ROW) grants and an amendment to the Arizona Strip Resource Management Plan (RMP), because a small portion of the pipeline would go outside an approved utility corridor.

The Highway Alternative would cross BLM and Tribal trust lands, which would require the BLM and BIA to issue ROW grants and require a tribal resolution from the Kaibab Band of Paiute Indians. Both alternatives would cross lands administered by Reclamation and the NPS, requiring Reclamation to issue a license agreement and the NPS to issue a ROW permit under either alternative.

In addition, UBWR has requested a water exchange contract with Reclamation. Under the exchange contract, UBWR would forbear the diversion of a portion of the natural flows to which UBWR is entitled and allow these flows to contribute to meeting the Endangered Species Act

Upper Colorado River Recovery Implementation Program requirements in the Green River. In exchange, UBWR would deplete an equal amount of water released from Flaming Gorge Dam throughout the year and available at Lake Powell. This exchange contract would not entitle UBWR to call for releases from Flaming Gorge.

Public Disclosure

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Brent Esplin,

Regional Director, Upper Colorado Basin—Interior Region 7, Bureau of Reclamation.
[FR Doc. 2019-26357 Filed 12-5-19; 8:45 am]
BILLING CODE 4332-90-P

DEPARTMENT OF THE INTERIOR

Office of Surface Mining Reclamation and Enforcement

[S1D1S SS08011000 SX064A000
201S180110; S2D2S SS08011000
SX064A000 20XS501520; OMB Control
Number 1029-0049]

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Special Permanent Program Performance Standards—Operations in Alluvial Valley Floors

AGENCY: Office of Surface Mining Reclamation and Enforcement, Interior.
ACTION: Notice of information collection; request for comment.

SUMMARY: In accordance with the Paperwork Reduction Act of 1995, we, the Office of Surface Mining Reclamation and Enforcement (OSMRE) are proposing to renew an information collection.

DATES: Interested persons are invited to submit comments on or before January 6, 2020.

ADDRESSES: Send written comments on this information collection request (ICR) to the Office of Management and Budget's Desk Officer for the Department of the Interior by email at OIRA_Submission@omb.eop.gov; or via facsimile to (202) 395-5806. Please provide a copy of your comments to

Press Releases

Reclamation seeks public comment on the proposed Lake Powell Pipeline Project

Media Contact: Robyn Gerstenslager, [801-524-3720](tel:801-524-3720), rgerstenslager@usbr.gov
Rick Baxter, [801-379-1078](tel:801-379-1078)

For Release: December 06, 2019



Glen Canyon Dam, Page, Arizona

PROVO, Utah - The Department of the Interior, through the Bureau of Reclamation, has issued a Notice of Intent to prepare an Environmental Impact Statement for the Lake Powell Pipeline Project (LPP), in accordance with the National Environmental Policy Act. Interior is seeking public comment on the scope of the environmental documents. This is the first step in the public scoping process.

The proposed pipeline would establish a second source of water for Washington and Kane counties in Utah, through an approximately 140-mile-long water delivery pipeline from Lake Powell near Glen Canyon Dam in Page, Arizona, to Sand Hollow Reservoir near

St. George, Utah. The project will help meet future water demands, diversify the regional water supply portfolio and enhance the reliability of the water supply.

Interior has designated Reclamation as the lead federal agency, with responsibility for coordinating the environmental compliance effort of all Interior agencies. Through this effort, Interior will assess the environmental impacts of the proposed pipeline. The proposed action to be analyzed in the draft EIS includes construction of the pipeline and associated facilities, entering into a water exchange contract, and potentially amending the Arizona Strip Resource Management Plan.

"The public scoping process is an important step in informing interested parties of the proposed action and gathering their issues and concerns," said Reclamation's Provo Area Office Manager Wayne Pullan. "Their input will help Interior define the scope of the EIS and identify significant issues to be analyzed in depth."

In addition to Reclamation, other Interior agencies involved in the development of the draft EIS will include the Bureau of Indian Affairs, Bureau of Land Management, U.S. Fish and Wildlife Service and National Park Service.

Comments and requests to be added to the mailing/notification list may be submitted by mail, web form, e-mail or fax to:

Lake Powell Pipeline Project Bureau of Reclamation, Provo Area Office 302 East Lakeview Parkway Provo, Utah 84606

Web form: <https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html> Email: lpp@usbr.gov FAX: 801-379-1159

Comments should be received by 11:59 p.m. Mountain Standard Time on Jan. 10, 2020.

A link to the Federal Register Notice regarding this proposed action can be found at <https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>.

###

Reclamation is the largest wholesale water supplier in the United States, and the nation's second largest producer of hydroelectric power. Its facilities also provide substantial flood control, recreation, and fish and wildlife benefits. Visit our website at <https://www.usbr.gov> and follow us on Twitter [@USBR](https://twitter.com/USBR).

Reclamation holds Lake Powell Pipeline public scoping meetings

Media Contact: Robyn Gerstenslager, [801-524-3720](tel:801-524-3720), rgerstenslager@usbr.gov
Rick Baxter, [801-379-1078](tel:801-379-1078), rbaxter@usbr.gov

For Release: January 06, 2020

UTAH – The Bureau of Reclamation, acting for the Department of the Interior, invites members of the public and media to attend three scoping meetings on the proposed Lake Powell Pipeline project.

The Utah Board of Water Resources is proposing to build the Lake Powell Pipeline to increase and diversify the water supply in southwestern Utah. The pipeline would deliver up to 86,249 acre-feet of water from Lake Powell to Washington and Kane counties to meet future water demands.

The locations and times for the public meetings are as follows:

• January 7, 2020, (Tuesday) Kanab Center, 20 N 100 E, Kanab, UT 84741; 6-8 p.m. • January 8, 2020, (Wednesday) Dixie Center, 1835 S Convention Center Dr., St. George, UT 84790; 6-8 p.m. • January 9, 2020, (Thursday) Valley High School, 325 W 11000 S, South Jordan, UT 84095; 6-8 p.m.

These scoping meetings provide an opportunity for the public to identify and comment on reasonable alternatives, concerns and issues that should be addressed in the Draft Environmental Impact Statement. Two pipeline alignments have been proposed in addition to the No Action Alternative. The proposed alignments are the Southern Alternative and Highway Alternative. The Southern Alternative would travel south of the Kaibab Indian Reservation and the Highway Alternative would cross lands held in trust by the United States for the benefit of the Kaibab Band of Paiute Indians, following Arizona State Route 389. Both alternatives will begin and end in the same locations.

To learn more about the project and how to participate please visit:

<https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html> or send an email to lpp@usbr.gov and request to be added to the mailing list.

###

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Postcard

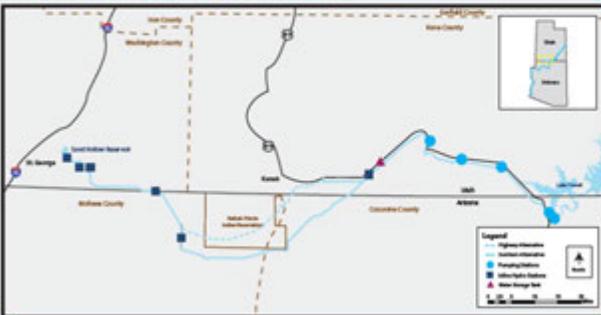
PUBLIC SCOPING MEETINGS

LAKE POWELL PIPELINE PROJECT

The Department of the Interior, through the Bureau of Reclamation (Reclamation), issued a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Lake Powell Pipeline (LPP) Project, in accordance with the National Environmental Policy Act (NEPA).

Reclamation will prepare an EIS for the LPP Project as proposed by the Utah Board of Water Resources. The LPP would be a 140-mile, 69-inch-diameter water delivery pipeline that would begin at Lake Powell near Glen Canyon Dam in Page, Arizona and end at Sand Hollow Reservoir near St. George, Utah. The proposed pipeline would establish a second source of water for Washington and Kane Counties, Utah. The project would help meet future water demands, diversify the regional water supply portfolio, and enhance the reliability of the water supply. The NEPA document will have three components: a water delivery pipeline with associated facilities, a water exchange contract with Reclamation, and a possible amendment to a Bureau of Land Management Resource Management Plan. Reclamation is seeking comments on the proposed LPP Project. The publication of the NOI in the Federal Register on December 2, 2019 formally initiates a comment period which will end at 11:59 pm MST on January 10, 2020. Public comments will be considered when drafting the EIS.

Three public meetings are scheduled in January 2020. Please see the table below for the public meeting locations, dates, and times closest to you. Representatives from Reclamation will be present to take comments and answer some questions. Comment forms will be available at each meeting.



Please submit your comments by January 10, 2020

Mail Comments To:
Lake Powell Pipeline Project
Bureau of Reclamation
Provo Area Office
302 East Lakeview Parkway
Provo, Utah 84606

E-mail Comments To:
lpp@usbr.gov

Project Website:
<https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>

Fax:
801-379-1159



BUREAU OF RECLAMATION

If you require special accommodations for the meeting, please contact Ellen Hopp at Galileo Project, LLC, by e-mail Ellen.Hopp@galileoaz.com, by telephone 460-629-4705, or by fax 480-629-5978.

Lake Powell Pipeline Project
Bureau of Reclamation, Provo Area Office
302 East Lakeview Parkway
Provo, Utah 84606



BUREAU OF RECLAMATION



PUBLIC MEETING LOCATIONS		
<p><u>Kanab Center</u> Tuesday, January 7, 2020 6:00pm – 8:00pm</p> <p>20 N. 100 E. Kanab, UT 84741</p>	<p><u>Dixie Center</u> Wednesday, January 8, 2020 6:00pm – 8:00pm</p> <p>1835 S Convention Center Dr St. George, UT 84790</p>	<p><u>Valley High School</u> Thursday, January 9, 2020 6:00pm – 8:00pm</p> <p>325 West 11000 S. South Jordan, UT 84095</p>

Letter to the Agencies



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF RECLAMATION
Provo Area Office
302 East 1860 South
Provo, UT 84606-7317



PRO-600
2.1.4.17



Subject: Agency and Public Scoping Meetings – Lake Powell Pipeline Project – Coconino and Mohave Counties, Arizona, and Kane and Washington Counties, Utah.

Dear [REDACTED]:

In accordance with the National Environmental Policy Act (NEPA), the Department of the Interior, through the Bureau of Reclamation (Reclamation), issued a Notice of Intent (NOI) on December 6, 2019, to prepare an Environmental Impact Statement (EIS) for the Lake Powell Pipeline (LPP) Project. The Bureau of Reclamation Provo Area Office invites you to participate in the public scoping process for the proposed LPP Project. The proposal may also include an amendment to a Bureau of Land Management Resource Management Plan.

Public scoping is the first step in the preparation of an Environmental Impact Statement (EIS) for any project under a Federal nexus. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what Reclamation and cooperating agencies should consider in the analysis. This letter is an invitation to participate in agency-only scoping meetings scheduled on January 7, 8, and 9, 2020. Your attendance is welcome at any of the agency meeting locations listed below:

Tuesday, January 7, 2020 1:00 – 2:30p.m. Kanab Center 20 N. 100 East Kanab, UT 84741	Wednesday, January 8, 2020 1:00 – 2:30p.m. Dixie Center 1835 S. Convention Center Dr. St. George, UT 84790	Thursday, January 9, 2020 1:00 – 2:30p.m. Springhill Suites 1211 S. State Street Draper, UT 84020
All presentations begin at 1:30pm		

The meeting will begin with an open house format providing an overview of the Project and an opportunity to answer questions. The presentation will begin at 1:30 p.m.

Reclamation will prepare an EIS for the LPP Project as proposed by the Utah Board of Water Resources. As proposed, the LPP would be a 140-mile, 69-inch-diameter water delivery pipeline that would begin at Lake Powell near Glen Canyon Dam in Page, Arizona and end at Sand Hollow

INTERIOR REGION 7 • UPPER COLORADO BASIN
COLORADO, NEW MEXICO, UTAH, WYOMING

Reservoir near St. George, Utah. The proposed pipeline would establish a second source of water for Washington and Kane Counties, Utah. The project would help meet future water demands, diversify the regional water supply portfolio, and enhance the reliability of the water supply. A map of the project area is enclosed for your reference.

Reclamation is seeking your input (resource concerns, planning information, laws, development plans, recreation, etc.) that would be relevant to the analysis. The formal scoping period begins with the issuance of the NOI and ends January 10, 2020.

Your attendance is also welcome at any of the public scoping meetings listed below:

Tuesday, January 7, 2020 6:00 – 8:00pm Kanab Center 20 N. 100 East Kanab, UT 84741	Wednesday, January 8, 2020 6:00 – 8:00pm Dixie Center 1835 S Convention Center Dr. St. George, UT 84790	Thursday, January 9, 2020 6:00 – 8:00pm Valley High School 325 West 11000 South South Jordan, UT 84095
All presentations begin at 6:30pm		

You may submit comments at any time during the preparation of the EIS; however, if you would like to have your comment(s) considered for inclusion in the Draft EIS, comments must be submitted during the Scoping period. You may submit your comments by any of the following methods:

- Written comments directly at the agency-only meeting or any of the public scoping meetings;
- Mail: Lake Powell Pipeline Project
Bureau of Reclamation, Provo Area Office
302 East Lakeview Parkway
Provo, Utah 84606;
- Website: <https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>;
- Email: lpp@usbr.gov;
- Fax: 801-379-1159

If you have any questions about this Project, please contact Rick Baxter, Reclamation Program Manager, at [REDACTED]. If you require special accommodations for the public hearing(s), please contact Ellen Hopp at Galileo Project, LLC: by e-mail at ellen.hopp@galileoaz.com; by telephone at [REDACTED]; or by fax at [REDACTED]. We appreciate your participation in this proposed project.

Sincerely,



Wayne G. Pullan

Enclosure

Newspaper Ad

PUBLIC SCOPING MEETINGS



— BUREAU OF —
RECLAMATION

Public Meeting Locations

Tuesday, January 7, 2020
6:00 – 8:00pm
Kanab Center
20 N. 100 E.
Kanab, UT 84741

Wednesday, January 8, 2020
6:00 – 8:00pm
Dixie Center
1835 S Convention Center Dr
St. George, UT 84790

Thursday, January 9, 2020
6:00 – 8:00pm
Valley High School
325 West 11000 S.
South Jordan, UT 84095

The presentations will
begin at 6:30pm

LAKE POWELL PIPELINE PROJECT

The Department of the Interior, through the Bureau of Reclamation (Reclamation), issued a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Lake Powell Pipeline (LPP) Project, in accordance with the National Environmental Policy Act (NEPA).

Reclamation will prepare an EIS for the LPP Project as proposed by the Utah Board of Water Resources. The LPP would be a 140-mile, 69-inch-diameter water delivery pipeline that would begin at Lake Powell near Glen Canyon Dam in Page, Arizona and end at Sand Hollow Reservoir near St. George, Utah. The proposed pipeline would establish a second source of water for Washington and Kane Counties, Utah. The project would help meet future water demands, diversify the regional water supply portfolio, and enhance the reliability of the water supply.

The NEPA document will have three components: a water delivery pipeline with associated facilities, a water exchange contract with Reclamation, and a possible amendment to a Bureau of Land Management Resource Management Plan.

Reclamation is seeking comments on the proposed LPP Project. The publication of the NOI in the Federal Register on December 2, 2019 formally initiates a comment period which will end at 11:59 pm MST on January 10, 2020. Public comments will be considered when drafting the EIS.

Three public meetings are scheduled in January 2020. Representatives from Reclamation will be present to take comments and answer some questions. Comment forms will be available at each meeting.

HOW TO SUBMIT COMMENTS

Mail:
Lake Powell Pipeline Project
Bureau of Reclamation,
Provo Area Office
302 East Lakeview Parkway

Email: lpp@usbr.gov

Fax: 801-379-1159

Project Website
<https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>

Please submit comments by
January 10, 2020
for consideration
in the draft EIS.

If you require special accommodations for the meeting, please contact Ellen Hopp at Galileo Project, LLC, by email Ellen.Hopp@galileoaz.com, by telephone 480.629.4705, or by fax 480.628.5978.

Appendix B

Scoping Meeting Materials

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Meeting Handout

How can I participate in the process?

Public meetings will be held during the public scoping period and the Draft EIS comment period. Reclamation invites the public to attend the public meetings to gather information about the project and to provide comments that may inform the federal managers' final decisions.

You can make a difference by providing us with your specific ideas, comments, or concerns about the proposed project. Comments should focus on the potential environmental effects, reasonable alternatives, and measures to avoid or reduce environmental impacts. The more specific your comments, the more useful they will be.

What is public scoping?

Public scoping is the process federal agencies use to identify public issues and concerns relating to actions on federal lands. Scoping is the process of identifying the range of issues, management concerns, and preliminary alternatives that should be addressed in the EIS. The public scoping period is the first opportunity for public involvement on a proposed action. A NOI to develop an EIS, published in the Federal Register, will open a public scoping period. A series of public meetings will be held throughout the project area to provide the public with information and to solicit comments and input on the proposed action.

Comments can be submitted in the following ways:

Mail: Lake Powell Pipeline Project
Bureau of Reclamation, Provo Area Office
302 East Lakeview Parkway
Provo, UT 84606

Website: <https://www.usbr.gov/uc/mvdocs/eis/LakePowellPipeline/index.html>

Email: lpp@usbr.gov

Fax: 801-379-1159

How can I stay informed about the LPP Project?

Visit the project's website for project updates:
<https://www.usbr.gov/uc/mvdocs/eis/LakePowellPipeline/index.html>

Request to be added to project mailing list at one of the public meetings or by email to lpp@usbr.gov

The public meetings will be held in the following venues:

Tuesday, January 7, 2020	Wednesday, January 8, 2020	Thursday, January 9, 2020
6:00pm – 8:00pm Kanab Center 20 N. 100 E. Kanab, UT 84741	6:00pm – 8:00pm Dixie Center 1835 S Convention Center Dr St. George, UT 84790	6:00pm – 8:00pm Valley High School 325 West 11000 S. South Jordan, UT 84095
The presentations will begin at 6:30pm		

To have your comments considered for the Draft EIS
please submit them by **January 10, 2020**.

Lake Powell Pipeline Frequently Asked Questions



What is the Lake Powell Pipeline Project?

The Lake Powell Pipeline (LPP) is a proposed 140-mile, 69-inch-diameter water delivery pipeline that begins at Lake Powell near Glen Canyon Dam in Page, Arizona, and ends at Sand Hollow Reservoir near St. George, Utah. The pipeline would deliver up to 86,249 acre-feet of water from Lake Powell to Washington and Kane counties in southwest Utah. Utah Board of Water Resources (UBWR) proposes building the LPP in order to bring a second source of water to Washington and Kane Counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability.

What is the history of the Lake Powell Pipeline Project?

UBWR previously proposed a pipeline project with an intake at Lake Powell that included a hydroelectric peaking station and a future pumped storage system at Hurricane Cliffs, Utah. The Federal Energy Regulatory Commission (FERC) was the lead federal agency for that project because it would have required a hydroelectric license issued by the FERC. The UBWR withdrew its application to the FERC on September 25, 2019, and the project was terminated effective October 10, 2019.

Who is the lead federal agency?

The Bureau of Reclamation (Reclamation) has been designated the lead federal agency by the Department of the Interior for the LPP Project National Environmental Policy Act (NEPA) process. Based on the changes to project design and the lead federal agency, Reclamation is initiating a new public scoping process, which will require interested parties to submit new comments on the current proposal. Reclamation's Provo Area Office is the lead office responsible for the NEPA review effort. Ultimately, the Secretary of the Interior will decide whether to approve the LPP Project.



Who are the Cooperating Agencies and what are their roles?

Bureau of Land Management (BLM): The BLM is the lead federal agency for Section 106 of the National Historic Preservation Act (NHPA), Section 7 of the Endangered Species Act compliance, and the proposed Arizona Strip Resource Management Plan (RMP) Amendment. The BLM has the responsibility of deciding whether to amend the RMP and whether to issue a right-of-way (ROW).

National Park Service (NPS): The NPS will submit a non-impairment determination along with the Record of Decision (ROD). NPS will decide whether to issue a ROW grant.

US Fish and Wildlife Service (FWS): The FWS is responsible for the Biological Opinion (BO).

Bureau of Indian Affairs (BIA): The BIA will assist the Tribe throughout the NEPA process as a Cooperating Agency.

Kaibab Band of Paiute Indians (Tribe): The Tribe was previously a Cooperating Agency and an Intervenor under the FERC process. Reclamation sent the Tribe a Cooperating Agency invitation letter on November 4, 2019.

Are there any Alternatives?

Two pipeline alignments have been proposed: The Southern Alternative and the Highway Alternative. Both alternatives begin and end in the same locations. The Southern Alternative would travel south of the Kaibab Indian Reservation while the alignment for the Highway Alternative would cross lands held in trust by the United States for the benefit of the Kaibab Band of Paiute Indians, following Arizona State Route 389. The Southern Alternative would cross land administered by the BLM in Utah and Arizona and would require multiple ROW grants and an amendment to the Arizona Strip RMP, because a small portion of the pipeline would go outside an approved utility corridor. Three action alternatives, plus a No Action alternative, are being considered based on scoping conducted by the BLM in 2018.

The Highway Alternative would cross BLM and Tribal trust lands, which would require the BLM and BIA to issue ROW grants and require a resolution from the Tribe. Both alternatives would cross lands administered by Reclamation and the NPS, requiring Reclamation to issue a license agreement and the NPS to issue a ROW permit under either alternative.

In addition, UBWR has requested a water exchange contract with Reclamation.



What is a Water Exchange Contract?

Under the water exchange contract, UBWR would forbear the diversion of a portion of the natural flows to which UBWR is entitled and allow these flows (~400 miles) to contribute to meeting the Endangered Species Act Upper Colorado River Recovery Implementation Program requirements in the Green River. In exchange, UBWR would deplete an equal amount of water released from Flaming Gorge Dam throughout the year and available at Lake Powell. This exchange contract would not entitle UBWR to call for releases from Flaming Gorge.

What is an Environmental Impact Statement?

An EIS describes the positive and negative effects of a proposed action, describes alternative actions, and provides an analysis of environmental impacts and ways to mitigate such impacts. It is prepared for major federal actions that may be controversial or have a significant effect on the environment. The purpose of an EIS is to identify potential environmental issues related to the project, analyze the project's impacts on resources and disclose them to the public. When completed, it is a tool for informed decision making.

The EIS is a public document and the public is encouraged to provide input throughout the development of the EIS. In addition to the public, the EIS will inform federal, state, and local permitting agencies as well as Cooperating Agencies and Native American Tribes.

The EIS is not a decision document but is intended to provide information to Reclamation and other agency decision makers in order to make informed decisions. It is the basis for the Record of Decision (ROD), which is the final decision on whether to permit the project.

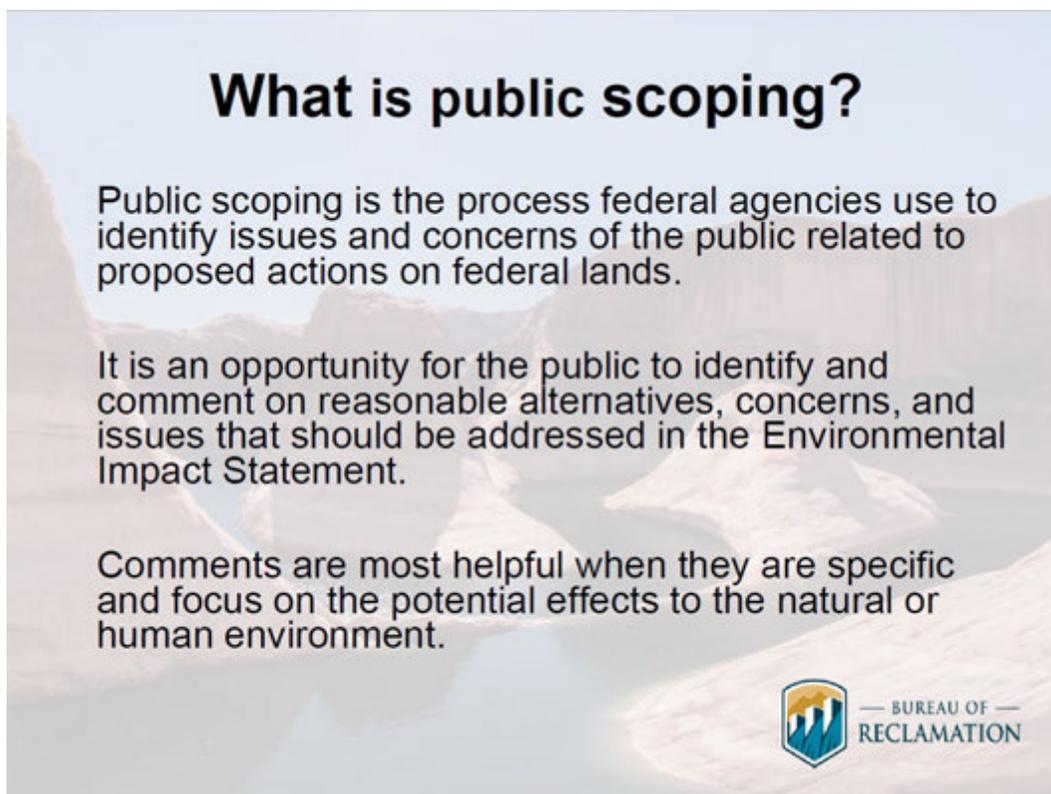
See https://ceq.doe.gov/docs/get-involved/Citizens_Guide_Dec07.pdf for more information on the NEPA and EIS process.

What is the process for preparing an EIS?

There are several steps involved in preparing an EIS, as defined by NEPA. The EIS process begins with the publication of a Notice of Intent (NOI) in the Federal Register. The NOI initiates the scoping period, during which agencies and the public can give feedback and submit their comments for review. Reclamation and Cooperating Agencies use the information derived from public scoping comments to identify potential resource concerns, project modifications, alternatives, and environmental mitigation measures. The process is documented and potential impacts to each of the alternatives are disclosed in a Draft EIS. After public review of the Draft EIS, comments are considered and incorporated into the Final EIS and a Notice of Availability (NOA) is published by EPA in the Federal Register. The agencies will include substantive comments, as well as agency responses, in the Final EIS. The EIS process ends with the issuance of the ROD.



Meeting Poster Boards



How can I participate?

Obtain information at our website:

<https://www.usbr.gov/uc/envdocs/eis/LakePowellPipeline/index.html>

Request to be added to our mailing list at:

lpp@usbr.gov

Attend a public scoping meeting to obtain information:

Kanab, UT – January 7

St. George, UT – January 8

South Jordan, UT – January 9



What is the purpose of and need for the Lake Powell Pipeline?

The Utah Board of Water Resources proposes building the Lake Powell Pipeline in order to bring a second source of water to Washington and Kane counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability.



What is the Lake Powell Pipeline?

The Lake Powell Pipeline is a proposed water delivery pipeline that begins at Lake Powell near Glen Canyon Dam in Page, Arizona, and ends at Sand Hollow Reservoir near St. George, Utah.

The pipeline would deliver up to 86,249 acre-feet of water from Lake Powell to Washington and Kane counties in southwest Utah.



Where is the proposed project?

Lake Powell Pipeline Project Area

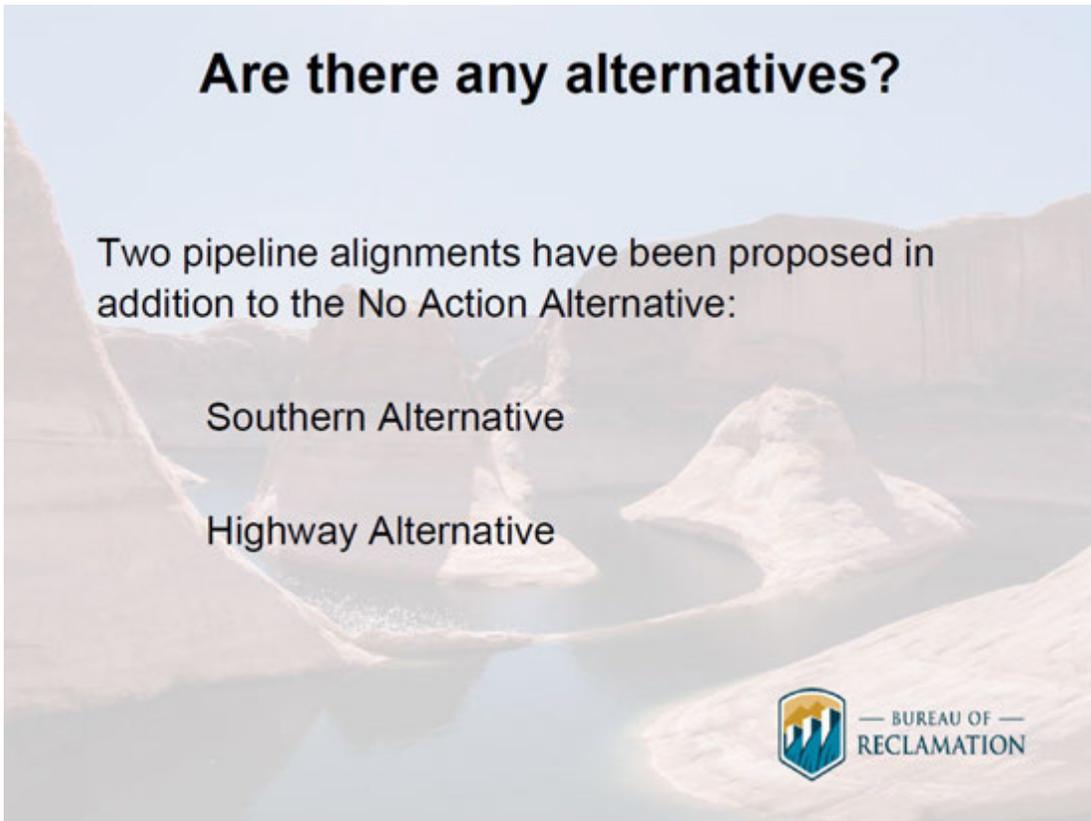
Colorado River

Utah

Arizona

Lake Powell

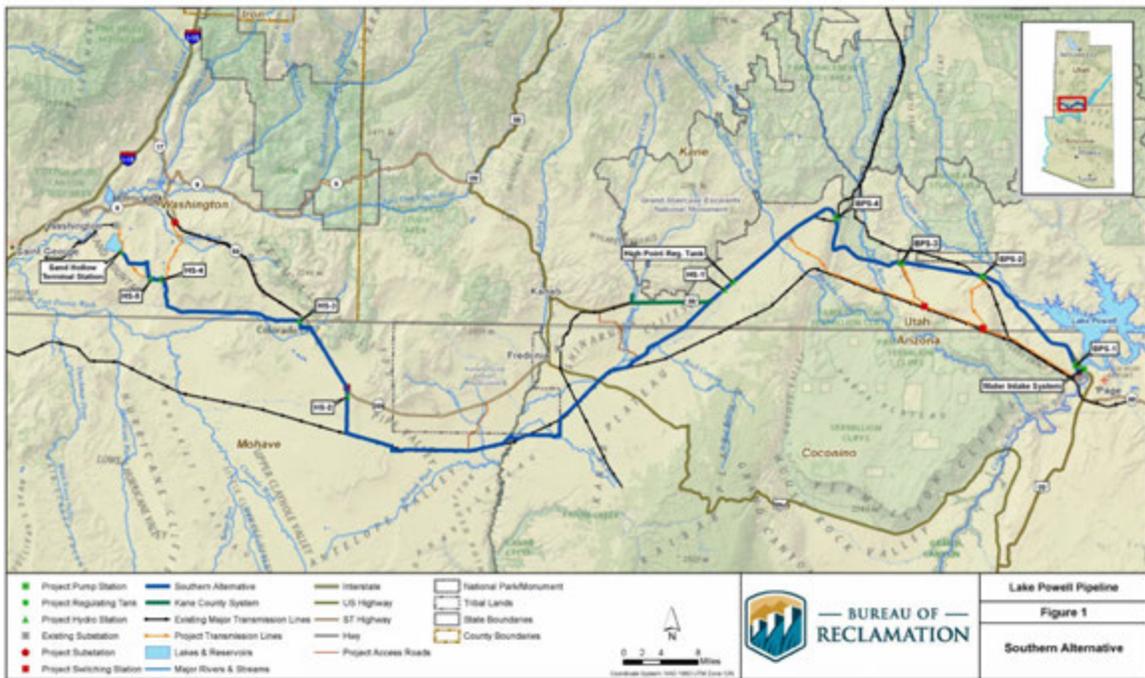




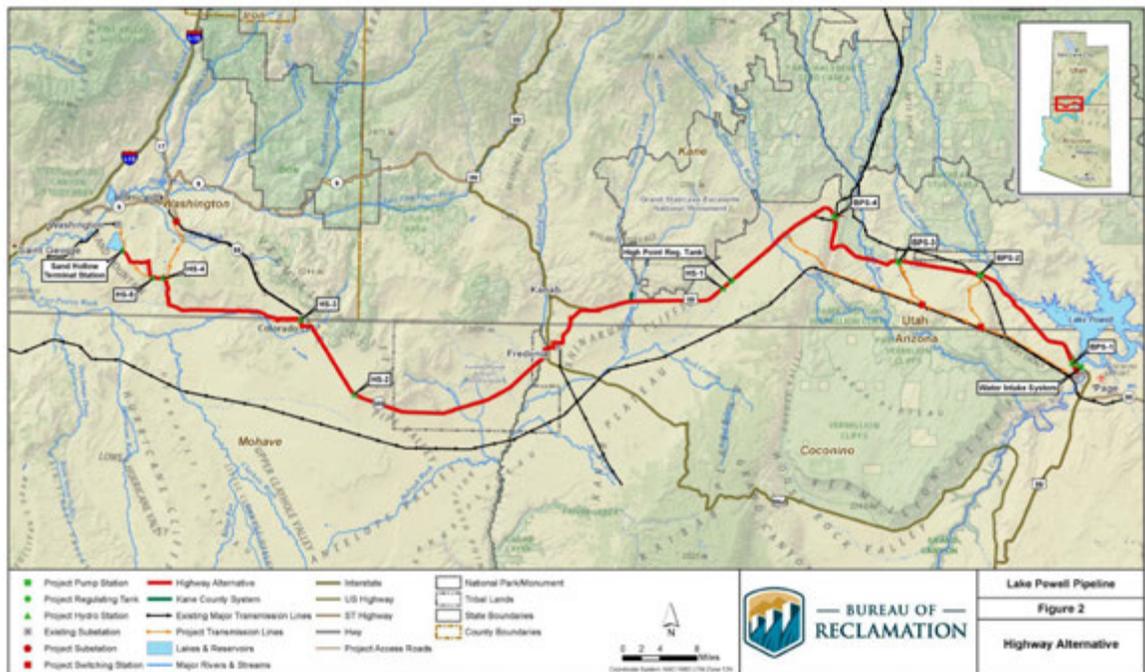
Both Alternatives



Southern Alternative



Highway Alternative



Alternatives for the Resource Management Plan Amendment

If the Southern Alternative is selected the three options for amending the RMP are as follows:

RMPA 1 – Amend Decision Nos. MA-LR-06 and LA-VR-01

RMPA 2 – Amend the size of the Kanab Creek Area of Critical Environmental Concern

RMPA 3 – Same as RMPA 1 and amend the configuration of the utility corridor



Who is the lead federal agency?

The Bureau of Reclamation has been designated the lead federal agency by the Department of the Interior for the National Environmental Policy Act process.

Ultimately, the Secretary of the Interior will decide whether to approve the Lake Powell Pipeline Project.

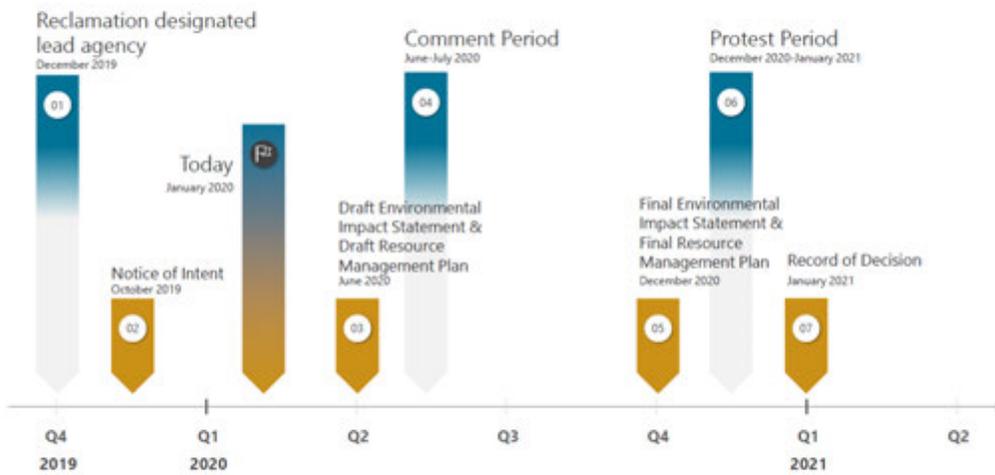


Who are the cooperating agencies?

Bureau of Indian Affairs
Bureau of Land Management
Kaibab Band of Paiute Indians
National Park Service
U.S. Fish and Wildlife Service



What is the project timeline?



How can I submit comments?

Submit comments by **January 10, 2020** in one of the following ways:

Provide comments to the court reporter at a public scoping meeting

Email: lpp@usbr.gov

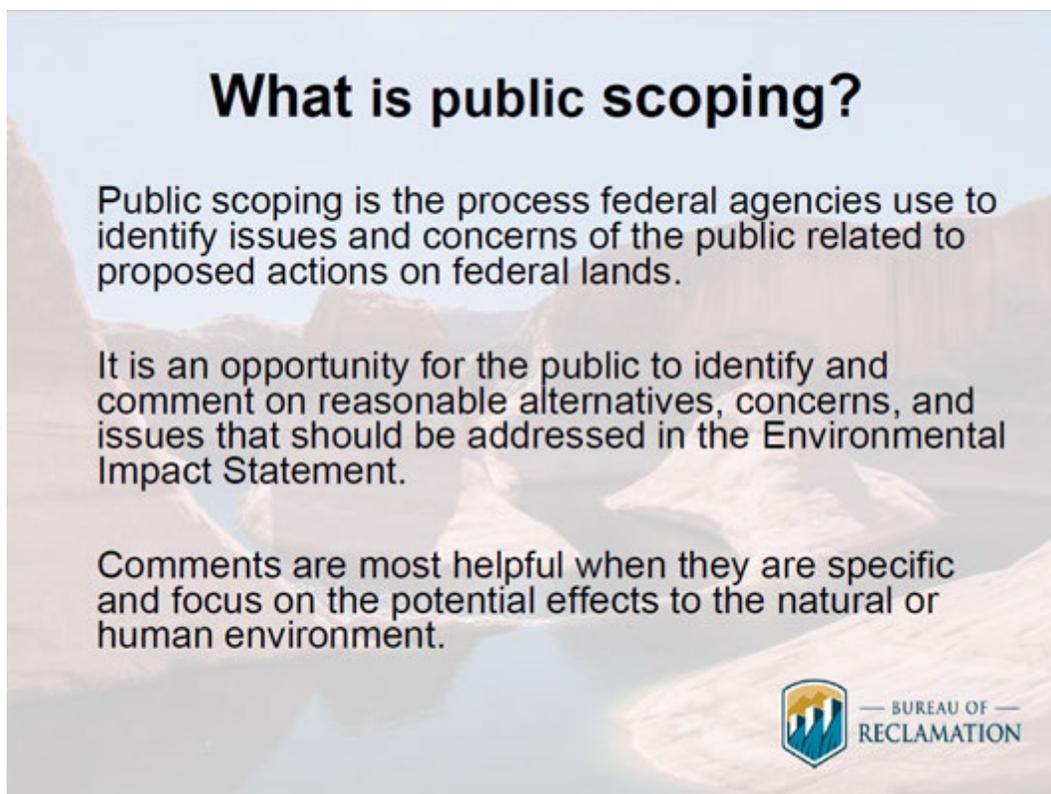
Fax: 801-379-1159

Mail: LPP comments
302 East Lakeview Parkway
Provo, UT 84606



— BUREAU OF —
RECLAMATION

Meeting Presentation



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History of the Lake Powell Pipeline Project

- 2008 NOI issued – FERC lead federal agency
- Studies began to determine the effects to the human and natural environment.
- It was a water delivery and power generation project.
- September 2019 – UBWR pulled their application from FERC
- DOI assigned the Bureau of Reclamation as the lead federal agency for NEPA.



Who is the lead federal agency?

The Bureau of Reclamation has been designated the lead federal agency by the Department of the Interior for the National Environmental Policy Act process.

Ultimately, the Secretary of the Interior will decide whether to approve the Lake Powell Pipeline Project.



Who are the cooperating agencies?

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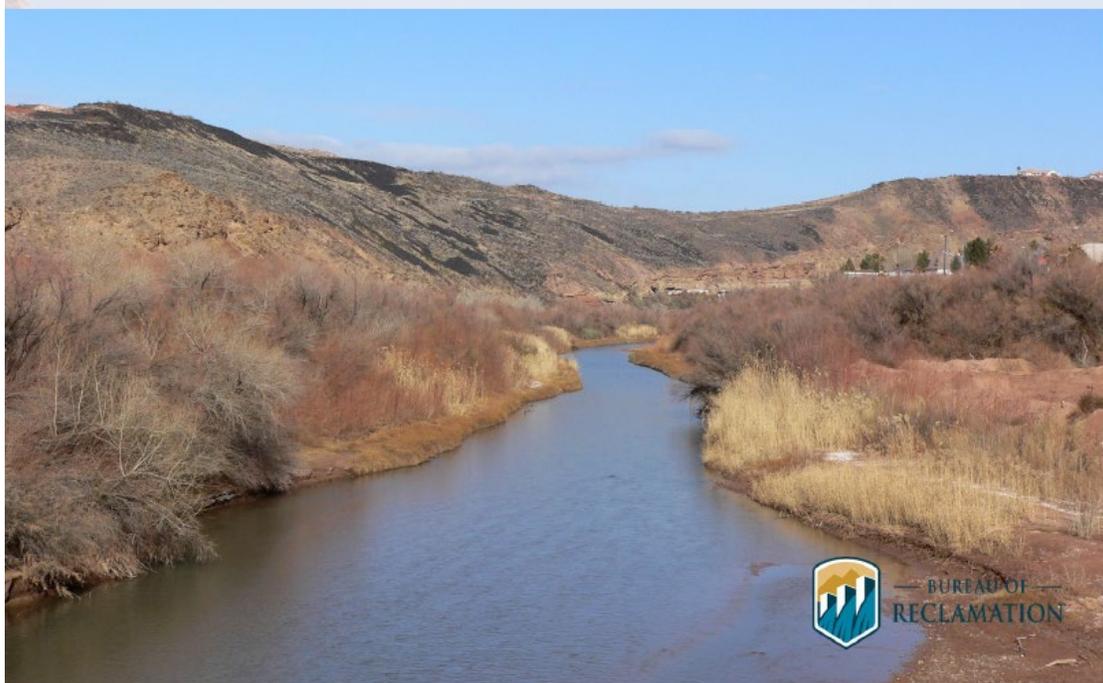


What is the purpose of and need for the Lake Powell Pipeline?

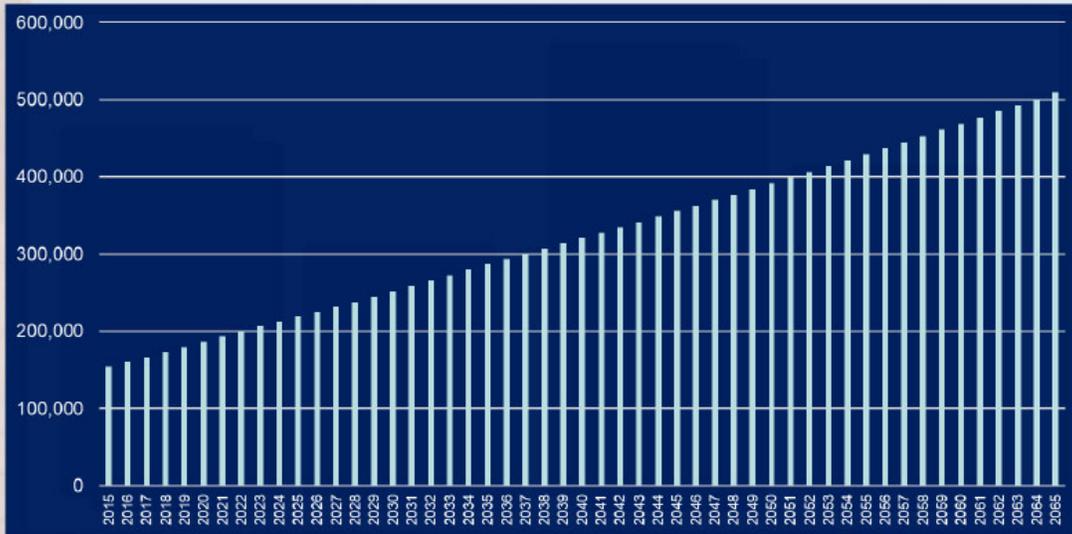
The Utah Board of Water Resources proposes building the Lake Powell Pipeline in order to bring a second source of water to Washington and Kane counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability.



Virgin River



Washington County's population is projected to increase to >500,000 residents by 2065



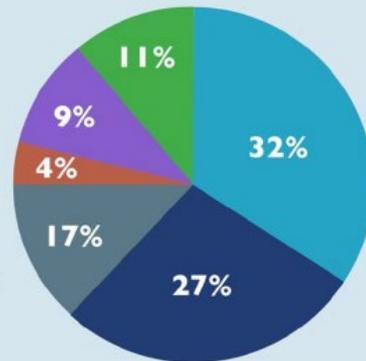
Source: Kem C Gardner Policy Institute – U of U, 2017



How will demand be met in 2060?

Meeting Future Water Demand in Washington and Kane Counties through 2060

- LPP
- Agricultural Conversion
- LPP Reuse
- Conservation and Reuse
- Local Projects
- Existing Supply



Water Needs Assessment, April 2016 and Water Needs Assessment: Demand and Supply Update, November 2018

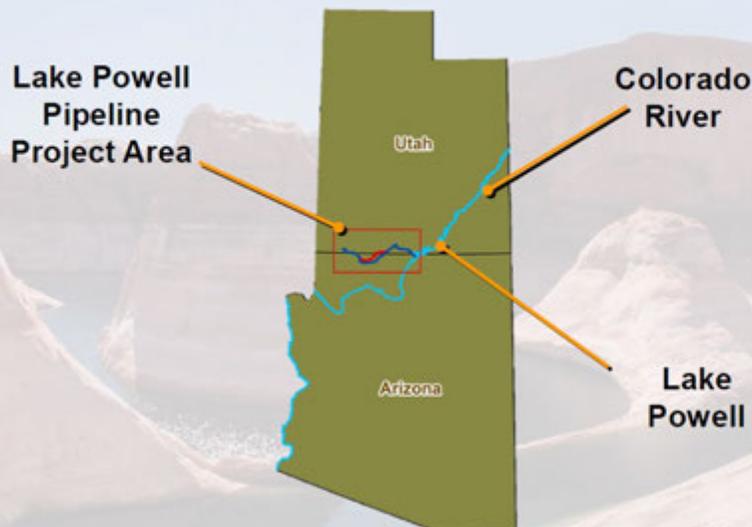


What is the Lake Powell Pipeline, as proposed?

- A water delivery pipeline (approx. 140 miles) that would begin at Lake Powell near Glen Canyon Dam in Page, Arizona and ends at Sand Hollow Reservoir near St. George, Utah.
- A 69-inch welded steel pipe that would be buried.
- The pipeline would deliver up to 86,249 acre-feet of water
 - 82,249 acre-feet to Washington County
 - 4,000 acre-feet to Kane county



Where is the proposed project?



Are there any alternatives?

Two pipeline alignments have been proposed in addition to the No Action Alternative:

Southern Alternative

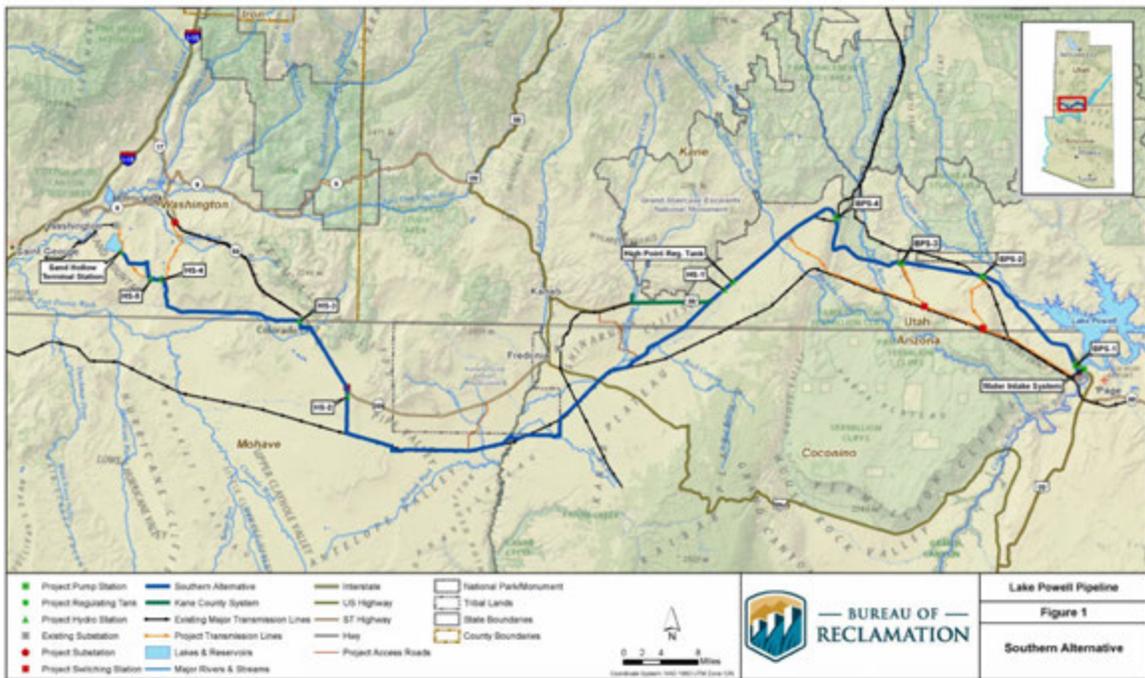
Highway Alternative



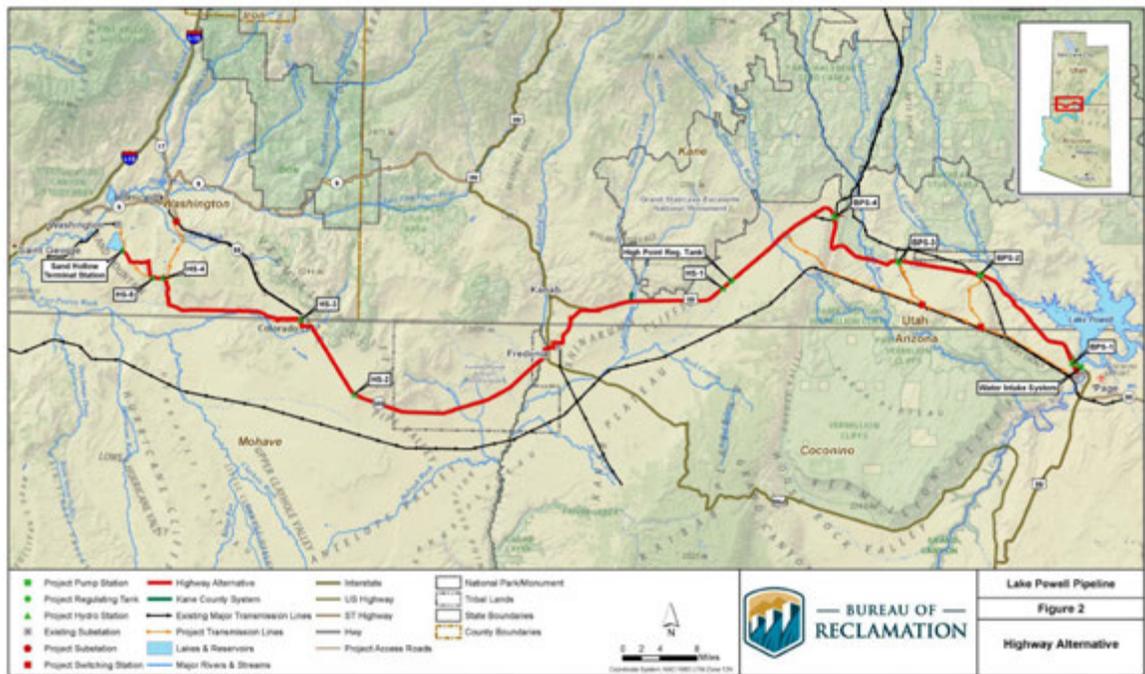
Both Alternatives



Southern Alternative



Highway Alternative



Alternatives for the Resource Management Plan Amendment

If the Southern Alternative is selected the three options for amending the RMP are as follows:

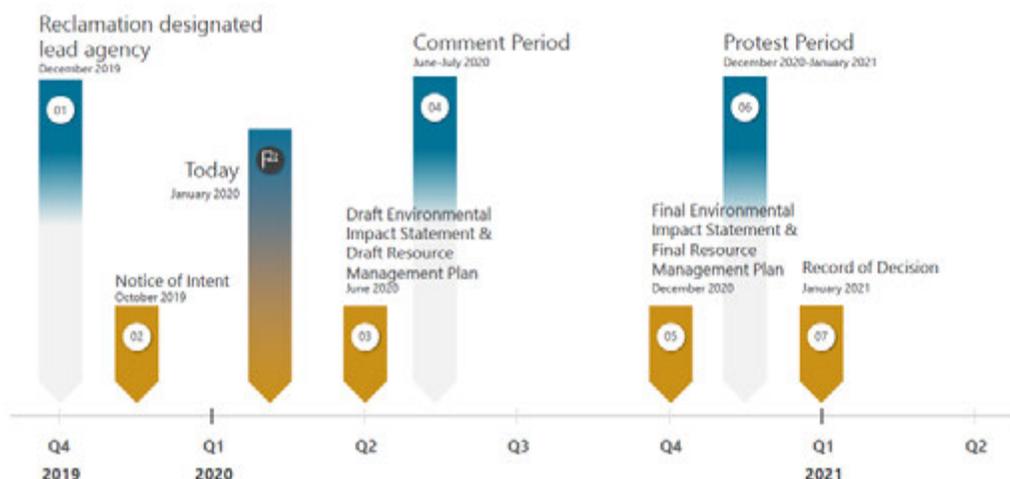
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What is the project timeline?



How can I submit comments?

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Provide comments to the court reporter at a public scoping meeting

Email: lpp@usbr.gov

Phone: Rick Baxter
801-379-1078

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Mail: LPP comments
302 East Lakeview Parkway
Provo, UT 84606



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Appendix C

Scoping Comment Matrix

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Scoping Comments

*Comment Number and Segment ID numbers are unique identifiers, randomly assigned to the submissions and comments as they are input into the comment analysis system and evaluated for specific issues. They are used for tracking purposes only.

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Tom	Butine	1	1	NEPA Process	On one page you give the places and dates but not the times, and on another place you give the times, but not the places and specific dates. Pretty hard for the public to navigate. ? And the press release link on the project page referenced below is indeed broken, even though you can get to the release if you have the url for it. Not so easy to find.
Tom	Butine	2	2	NEPA Process	On one page you give the places and dates but not the times, and on another place you give the times, but not the places and specific dates. Pretty hard for the public to navigate. ? And the press release link on the project page referenced below is indeed broken, even though you can get to the release if you have the url for it. Not so easy to find.
kelsey	phelps	3	3	Alternatives	I live in Washington County and there is already too much wasted water. We live in the desert and I see homes and parks constantly over watering and wasting water year round. Until we can responsibly use what we already have and accept that we live in a desert the LPP will only cost money and exacerbate the current inefficiencies. I am against this project.
Lowell	Smoger	4	4	Water Resources	I am deeply concerned about the plan to pipe water from Lake Powell. I am opposed to further divergence of water to from this already suffering waterway. The effect will add to the already dire issue of water scarcity immediately at Lake Powell and further downstream. The detrimental effects of this pipeline will be cascading and one only needs to look at existing studies on the water supply in this region to understand that.
Rich	Cline	5	5	Water Supply	I do not think the Pipeline is prudent. For 20 years, the Colorado River Basin allocations have been exceeding demand and storage efficiency due to climate variance. Climate model projections do not suggest a wetter basin but rather warmer and dryer. That River is a precious, shared resource, and given the present and future scarcity predictions, it needs to be managed thoughtfully and collaboratively.

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Rich	Cline	5	361	Alternatives	Washington County has one of the highest per capita water use rates in the West – more than double what many similar Western cities use. Basic changes to outdoor landscaping (think native plants, not bluegrass) and irrigation practices, for example, would go a long way in Washington County. Water rate structures should move to reward water efficiency and ensure water wasters pay heavily.
Steven	Shipley	6	6	Aquatic Invasive Species	The eggs and/or larvae from the Zebra and Quagga Mussels can travel in the water contaminating the pipeline and then Sand Hollow and Quail Reservoirs. Will the water be treated before it is sent down the pipeline? I don't think so too expensive.
Valerie	Schultz	7	26	Opinion - Opposed to Proposed Lake Powell Pipeline	I just don't want to see Lake Powell become a barren wasteland. I understand the need for clean water, but also understand the need to conserve and i'd like to see more policies in the ways of conservation that mining, construction, and depleting a precious natural resource. After Lake Powell, then what?
Jordan	Seldin	8	27	Opinion - Opposed to Proposed Lake Powell Pipeline	I don't support the pipeline from Lake Powell.
Taylor	Belnap	9	28	Opinion - Opposed to Proposed Lake Powell Pipeline	This water pipeline is a big waste of tax payers money and would destroy the surrounding ecosystem for absolutely no reason. We know our future is not supporting Glen Canyon Dam. Rather the future is in the process a its deconstruction and elimination. Glen Canyon Dam was built for absolutely no reason, and by deciding to go through with this project would mean that it's cementing the long term use of its ecological destruction. Let's face the truth, Washington county doesn't need this extra water supply, and the real reason for this project is to fill the pockets of a few people. Please take my comment with high consideration. This pipeline is not the future of how we view water sustainability in Utah. Washington county has no right to this body of water nor does Paige Arizona. Keep the Colorado River flowing!

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Russell	Taylor	10	29	Aquatic Invasive Species	Lake Powell is infested with invasive species of mussels. The water coming from Lake Powell will be contaminated with veligers that will both fill/restrict flow in the pipe and contaminate any takedown reservoirs as they colonize. I understand that St. George needs the water, but unless this mussel is prevented 100%, this pipe will fail with mussel contamination.
BRIAN	Davenport	11	30	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm actually pretty amazed this project is actually being thought of let alone moving forward. The Colorado river is slowly drying up and Lake Powell will be empty in the near future. Look at the history of it and it shows pretty well. It would a complete waste of tax payer dollars to do this project when the sustainability of the resource does not look reliable. I attended an energy and conservation forum recently and one of our state representatives actually said that we needed to hurry and get this project done "before Lake Powell dries up". That makes a lot of sense.. The Saint George area should look at conservation measures first like no lawn allowed at all, xeriscaping, etc. before finding new sources of water. Maybe even limit growth - heaven forbid.
Nick	Davidson	12	31	Opinion - Opposed to Proposed Lake Powell Pipeline	I want to register my opinion, as a resident of the southwest, that the Bureau of Reclamation should finally quash the Lake Powell Pipeline project. Water is failing in the west at ever more dramatic rates, and further taxing the already overtaxed, overallocated Colorado River Basin — which all scientific research indicates is endangered—would be highly irresponsible in exchange for a brief, foresight -less gain for one community. It is more than apparent that our current water situation in the Colorado River Basin is untenable. Please consider not only its immediate well -being, but also its future and the future of those of us who will continue to lean on it for survival. Do the right thing, the responsible thing, and stop this project from moving forward.
Alex	Cook	13	32	Water Supply	Lake Powell does not have the water to support this project. Lake Powell (and Lake Mead) are at capacity to provide water to both the Upper and Lower basins, and with the chance we see less precipitation in the future, there will be a bigger demand on these reservoirs.

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Alex	Cook	13	33	Water Supply	The water for this project would be used to provide water for future residential growth. Most of this growth is coming from people moving to the area from California. Does St George and the surrounding areas want to build out the area and make it a new Los Angeles?
Alex	Cook	13	34	Aquatic Invasive Species	Mussel infestation - Lake Powell is infested with Mussels and currently the lakes of St George area are not, why would we pump nuisances into the water's of our area?
Laura	Livnat	14	35	Opinion - Opposed to Proposed Lake Powell Pipeline	I am a SLC resident, and am adamantly opposed to your plan to build a Lake Powell Pipeline. Residents in Washington county live in a desert, and use more water than anyone in the country. They need to conserve a LOT more water before I can get on board with this plan. This is a waste of my tax dollars, come up with another plan.
Craig	Turner	15	36	Opinion - For Proposed Lake Powell Pipeline	I support the plan as proposed (either the highway or Southern routes). I currently live in Washington City, Utah... and making sure that my children have enough water in this area is of utmost importance to me. Hopefully Eminent Domain can be used sparingly to achieve these goals, but ultimately water is sorely needed in the St. George area.
Teri	Mader	16	37	Opinion - Opposed to Proposed Lake Powell Pipeline	I think the the Lake Powell Pipeline is a complete waste of taxpayer money. Before there is even any consideration of a such a plan, the local residents should take a serious look at conserving the water they already have and take some common sense steps to limit more development. When I see lawns, golf courses and more condominiums in this area it makes me seriously question the motives of some of the people pushing this project. All the counties in southern Utah should be seriously examining more reasonable water use and preventing population growth beyond our means to sustain it. Sincerely,

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
John	Rickenbach	17	7	General	What are the legal consequences of this action relative to the Law of the River as generally defined and applied? What would be the “real world” effects on water use in both the upper and lower basins as a result?
John	Rickenbach	17	8	Alternatives	The NEPA document needs to consider alternatives that analyze improved conservation in areas intended to benefit from the pipeline in determining whether the proposed action is the least environmentally damaging alternative. As it is, existing per capita water use in Washington County (and Utah in general) greatly exceeds many if not most major metro areas in the southwestern USA, including areas that benefit from the Colorado River Storage Project. A project like this should not be considered until all other feasible measures that achieve the same potential benefit have been implemented. It is not
John	Rickenbach	17	9	Alternatives	financially or ecologically responsible to insist on green lawns when native and drought-tolerant landscaping could reduce or perhaps remove the need for the project.
John	Rickenbach	17	10	Environmental Justice	The EIS needs to address environmental justice issues, particularly with regard to landowners along the route who may realize unfair economic benefits from the extension of such a pipeline, at the expense of taxpayers who are paying for the project.
John	Rickenbach	17	11	Mitigation	The document needs to address maintenance issues, especially with regard to cost and possible ecological damage related to sustained vehicular access to the pipeline.
John	Rickenbach	17	12	Aquatic Invasive Species	The document must address the possibility of introducing non-native species as a result of pipeline extension.

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
John	Rickenbach	17	13	Environmental Justice	The document must address potential growth-inducing impacts that result from the project, both as a result of introducing a new source of water to the area, and the increase of property values along the route that incentive development along the way, thus negating the purpose of the project relative to providing an increased water supply to serve existing development.
John	Rickenbach	17	14	Cultural Resources	What cultural resources will be affected along the route? And how will this affect tribal water supplies?
John	Rickenbach	17	15	Wildlife	Will the pipeline create an ecological barrier for the movement of wildlife?
John	Rickenbach	17	16	Public Health and Safety	Where will fill be imported from or exported to as part of project construction? The EIS needs to consider potential health hazards from soil contamination.
John	Rickenbach	17	17	T&E Species	What effects on endangered species, including critical habitat to those species, will occur? Will the diversion of water have direct or indirect on such species?
John	Rickenbach	17	18	Fisheries	What will be the effect on fisheries in Lake Powell?
John	Rickenbach	17	19	Water Law	What will be the long-term effect on the ability for other Upper Basin states to access their rights to water within the Colorado River basin when there is already a demonstrated long-term inability for all states to achieve their theoretical allocations?
John	Rickenbach	17	20	Climate Change and GHGs	What will the long-term effects of climate change be on the sustainability of this project in the context of regional water supply?

Appendix C- Scoping Comment Matrix

Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Chris	West	18	38	Opinion - For Proposed Lake Powell Pipeline	I am writing to express my support for the Lake Powell Pipeline Project. The Saint George area is continuing to grow and is in need of this additional water.
John	Leake	19	39	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to this proposed project on several points: 1. Washington County has no plans or current ordinances/laws to require any water conservation efforts. 2. The Colorado River water is already spoken for in multiple treaties and agreements, and in fact is over committed in drought years. 3. Washington County Utah uses more water per capita than any other city in Utah 4. Washington County Utah must be brought to water conservation, not profligate use of a limited resource in the arid western desert
Don	Nash	20	40	Water Law	Where is the water for the pipeline project supposed to come from? It is my understanding that ALL of the water in Lake Powell is under the jurisdiction of the Colorado River Compact. It is also my understanding that the Colorado River Compact is still in effect. Have all the states belonging to the Compact signed off on Utah's plan to build the pipeline and draw water from Lake Powell? I'm thinking that Arizona, Nevada, California, and we'd have to include Mexico, will nix ANY plan to draw water that is already allocated at least three times over. Not counting the environmental damage that a pipeline to St. George would induce on an already vulnerable desert, the project is not even close to being cost effective. Please don't forget that it is up to the Bureau of Reclamation to insure that the water of Lake Powell and Lake Mead is available to all the signatories of the Compact and that the use is divided up fairly. Utah taking water from Lake Powell that is not already allocated would be a gross violation of federal law
Joel	Bingham	21	41	Opinion - Opposed to Proposed Lake Powell Pipeline	I live in Ivins Utah and nobody here wants this pipe dream ! Just once say no to developers.

Appendix C- Scoping Comment Matrix

Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Scott	Mershon	22	42	Opinion - Opposed to Proposed Lake Powell Pipeline	Based off of what I have learned about the proposed project I believe that the best course of action would be to work in the conservation of current water resources. The pipeline sounds expensive and unnecessary if water is managed more wisely. It is time we started acting like we live in a desert. Thank you for you time.
Mark	Anderson	23	22	Opinion - For Proposed Lake Powell Pipeline	I think that the wise use of our water resources is one of the most important things that we can do for the future of our state. Therefore it is my recommendation that the pipeline should be built as soon as possible! Mark Anderson, Fillmore Ut.
John	Slaughter	24	43	Aquatic Invasive Species	My concern is when the water is pumped out of Powell to Sand Hollow, what happens to the quagga muscles? DWR checks to make sure we aren't spreading those muscles throughout the state by boat. Now we are going to deliberately dump them into Sand Hollow? Then from there do they make their way into the close by Quail Hollow? How are you going to prevent this from happening?
Hal & Valerie	Johnson	25	44	Opinion - Opposed to Proposed Lake Powell Pipeline	I feel this project is a waste of money because the lake has hardly any water in it now. What will it be when a pipeline is built? Other methods of conservation need to be put in place. Some growth is necessary to remain vital but St. George does not need to asphalt/build on all the bare land! I am against the project.
Neil	ALLISON	26	21	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to development of the Lake Powell Pipeline and I will be voting with my feet (leaving Utah) if and when the pipeline meets final approval.
Catherine	Jex	27	45	Opinion - Opposed to Proposed Lake Powell Pipeline	The pipeline is not necessary nor should it be completed. Utah needs to exist with the natural resources available. Southern Utah as all of Utah is a desert.
Janet	Calliham	28	46	Opinion - Opposed to Proposed Lake Powell Pipeline	This will be a colossal waste of money and NEVER pay for itself. You'll build it only to satisfy well -connected developers. Fifty years from now it will be on record as the biggest boondoggle in Utah history

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Mark	Gilmore	29	47	Opinion - Opposed to Proposed Lake Powell Pipeline	My name is a Mark Gilmore. My wife and I have lived in St. George for 6 years. My heart is with maintaining Lake Powell as is. Our first experience with Lake Powell was in 1968, when we made our first trip to Wahweap Marina. We traveled there from Southern California for 10 consecutive years to enjoy what Lake Powell has to offer. I would not be in favor of constructing the pipeline to Sand Hollow. Southern Utah is already overbuilding. A lot of it's beauty is getting to the point that it will be looking like Orange County, CA, where we left.
K	Reynolds	30	48	Opinion - For Proposed Lake Powell Pipeline	Do it! Water in a desert is our most valuable asset. If we don't claim it, someone else will take our water rights. St. George and other parts of Utah are growing exponentially—literally. Any money spent on a pipeline will pay for itself. The value of water will always go up —just like the value of land! If we don't build now, it will be harder to fight for it later
Bryant	Henderson	31	49	Opinion - Opposed to Proposed Lake Powell Pipeline	I find it hard to believe that the population of Johnson Canyon which is under 300 people could possibly justify the expense and time it would take to deliver water to that underpopulated area via a tee and several miles of pipeline connected to the LPP. It is the only tee on the entire 140 mile length of the pipeline It also is interesting that the pipeline to Jonson Canyon would terminate at the property of the executive director of the local water district. Not only is it interesting, it smacks of political favor. I assure you that there are many people watching this situation and it is one thing to deliver water via the pipeline for a questionable need in St. George, but quite another to fulfill some political objective to an ex -member of the House of Representatives who supported (and possibly manipulated) this administration. Michael Noel benefitted tremendously from the size reduction of the National Monument adjoining his property(Grand Staircase Escalante) so he is already under the microscope of locals and elected Utah State Legislators. Please examine this project closely. It already will cost more than the locals can pay so any components of the project that are unnecessary and quite possibly illegal should be omitted. To me it is only common sense. I sincerely hope this email will be directed to the proper officials. Thank You, Bryant Henderson 435 -689 -1315
Jared	Baxter	32	50	Other	LPP

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Jared	Baxter	33	51	Other	Powell
Colin	Marshall	34	52	Aquatic Invasive Species	Zebra mussel spread – what is to stop the spread of zebra and quagga mussels? They are already ruining every watershed in the U.S.
Adrian	Vande Merwe	35	57	Opinion - Opposed to Proposed Lake Powell Pipeline	noooooooooooo!!!!!!!!!!!!!!!!!!!!!!
Brogan L	Fullmer	36	58	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing in opposition to the St. George water pipeline. Southern Utah and the American Southwest are growing at an unsustainable rate in a land already scarce of resources, at time of increasing global temperatures. The people of the state of Utah should not and cannot bear the burdens of snowbirds reluctant to live a true desert life, golfers who insist on pristine greens, and climate change deniers.
Ellen	Parrish	37	59	Alternatives	I stand with the many who oppose this bad plan. The cost of development is too much and the benefit to the public is too scant. Water is a precious and finite resource and I don't see conservation at the forefront of those who stand to benefit from this bad idea. I urge you to discard this poorly conceived plan. A better use of resources would be to educate the public about water conservation. Thank you.
Mary	Smith	38	60	Opinion - Opposed to Proposed Lake Powell Pipeline	Dear Sirs: I am against the pipeline from Lake Powell to St. George. In this era of supposedly enlightened thinking about the environment, I'm surprised that Utah even thinks about taking more water from Lake Powell when we cannot maintain the current water levels. Lake Powell is losing water and it is irrational to take even more water away from the Colorado River. What about the downstream cities, Las Vegas is already tryin to take Utah water for their use.
Sam	Mazzola	39	61	Opinion - Opposed to Proposed Lake Powell Pipeline	Please stop! Do not install pipeline, what a poor plan it would be. If there is no water in the desert don't live there, duh!

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Tim	Eyring	40	62	Opinion - For Proposed Lake Powell Pipeline	Build the pipeline and bring water to one of the most arid places in the US please. Has anybody figured the positive impact number of doing this project? Jobs, training, education, innovation, tourists, etc. Utah is not receiving enough benefit from God given water through Utah's Green River.
James	Debenham	41	63	Opinion - Opposed to Proposed Lake Powell Pipeline	As a lifelong resident of Utah, I strongly oppose the pipeline planned from Lake Powell to St. George. I worked for several years on the Colorado River and am saddened to see it overused. It rarely, if ever, even reaches the Pacific Ocean anymore due to overuse. To divert another large portion for golf courses and unsustainable lawns in a desert city like St. George is incredibly short -sighted. A desert city should stick to having desert features.
	Kyle	42	64	Opinion - Opposed to Proposed Lake Powell Pipeline	I am a Utah resident and do NOT WANT THE PIPELINE BUILT!
Skip Webber	D Wilson	43	65	Opinion - For Proposed Lake Powell Pipeline	“Water” is crucial to the future needs of a developing area. Especially for a dry desert area like southern Utah. Let’s get it done!
Tim	Eyring	44	66	Opinion - For Proposed Lake Powell Pipeline	Give Utah back a little more of our own water please. I want to start an orchard of pistachio trees in St. George. And I love that there is a pecan orchard just below Sand Hollow Reservoir. St. George is getting a 2nd temple. The St. George airport is legit. I think many more people want to move to St. George and vacation in St. George. More water is very important if not indispensable for St. George! BTW - Rename the river to the Green River at the confluence of the Colorado River and the Green River.
Linda	Vrabel	45	67	Visual Resources	I am writing in response to the proposed large power line installation related to the Lake Powell Pipeline along 3400 West in Dixie Springs. We live adjacent to 3400 W one lot removed. The placement of these large power line towers/ poles will be visible from our front and back yards, We will experience an unplanned interference

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					with the rights of enjoyment we originally had when we had our dream home built in 2017
Linda	Vrabel	45	68	Public Health and Safety	One of the things we loved about Dixie Springs when searching for a home lot was, and still is, the peaceful and rural family neighborhood feel. These poles would be installed along an almost fully developed street in the subdivision including a school bus line, mail routes, etc. Besides the visual impact, we are concerned about the loss of property values and the possible health effects of the emissions from the electric lines.
Linda	Vrabel	45	69	Alternatives	There are proposed alternative routes for the lines including along an existing easement on the north side of the development which does not run through any already developed neighborhoods.
Kevin M	Jacobsen	46	70	Opinion - For Proposed Lake Powell Pipeline	Get it done already!
Daniel	Cottam	47	71	Opinion - Opposed to Proposed Lake Powell Pipeline	This pipeline is one of the most absurd things i have ever heard of. The gov has proposed to spend a billion dollars to bring water to southern Utah. This absolutely follows the laws of econ 101 if you make something so cheap of course they will abuse it. Water in So Utah is about a penny a gallon. And you are surprised you have too little? If people paid more for their water then they would use less. If this is true then we should charge more for water now and watch people use less water if water prices go up to a dollar a gallon. The laws of scarcity will apply and people will find inventive ways to use less water. If you drive around St. George you see people watering lawns and you see large farms and you see puddles everywhere from sprinklers. Yet, you still want to spend a billion dollars. Australia when faced with water shortage used the free market and they found that when farmers could sell their surplus water there was plenty to go around even in dry years. This also does not account for the water we should be sending into the gulf of California or the downstream impacts on Mexico. Let the market solve this one, let farmers sell their

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					water, let the price fluctuate, buy back irrigated lawns and farms and their will be plenty of water without a billion dollar pipeline.
Don	Triptow	48	72	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is nothing but a massive boondoggle project that will benefit developers at the expense of local government and homeowners in Southern Utah. It is patently unfair to expect taxpayers to assume a gigantic tax increase an
Tom	Butine	49	73	NEPA Process	Your NOI lists the meeting dates and locations, but no times. What are the meeting times? And the link the press release on your scoping announcement page is broken. Can you fix it?
Russ	shepard	50	74	Opinion - Opposed to Proposed Lake Powell Pipeline	This idea is horrible. Projections for future inflows into Lake Powell will render this project as a waste before it gets started. Please don't waste our taxpayers money on this financial disaster.
Moe	Jones	51	75	Opinion - Opposed to Proposed Lake Powell Pipeline	I do not live in Utah, or Arizona, but rather in southern Colorado where water has been an issue for a long time. We voted to not let our water go out of the San Luis Valley, and also have a closed basin project that is a great waste of time and water as well as money. The water that is pumped out of the ground to make up for what was lost in the river is very saline and not drinking quality. The BLM's thoughts and plans were a waste of time and money and this is how I see this project. We now have sub-districts and water for farming is scarce, and now expensive!! Build the planned hydro dams and store the water, it can be used for much more beneficial usage. If you do a pipeline what is the cost of upkeep, maintenance, will there be enough water in say 100 years if the southern Utah area becomes a lush garden? Do you build this pipeline for the benefits of a few at the taxpayer's expense that do not get benefit from the water?
Tom	Mecham	52	76	Opinion - Opposed to	DO NOT mess with Lake Powell. It struggles enough as it is and if you continue to lower the water level then critics of the reservoir will have more and more ammunition to get it drained. Let's NOT give them that ammunition!!!

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				Proposed Lake Powell Pipeline	
John	Browne	53	77	Alternatives	There must be a conservation alternative to the EIS. I was involved in many EIS in my work in Los Alamos. It is critical that alternatives be considered seriously BEFORE any irrevocable decisions are made. I am appalled at the water usage on the St George area. My wife and I closely monitor our water usage and find we are at 50% or less than the average here. Why can't everyone commit to using less water. It was a major issue in New Mexico and one can see that Albuquerque which is a city of over 500,000 uses 125 gallons per capita per day with a goal of 110 gallons by 2037. St. George still uses 250 gallons per capita per day - one of the worst in the desert southwest. The EIS should show how much water could be saved in our area and what it would cost as an alternative to the LPP
John	Browne	53	78	NEPA Process	The costs of the LPP remain a mystery to most residents of this area. I have been involved in billion dollar projects and I assure you that doing DUE DILIGENCE regarding spending the money of your people should be your highest priority. Cost estimates must be not only developed in detail they MUST be scrutinized by independent experts to
John	Browne	53	79	NEPA Process	lend credibility. That is what I had to do in my job and it helped tremendously. There are lots of well educated people in your constituency who can read spreadsheets and understand cost of construction and operation. They can either be your allies or your enemies. I suggest TOTAL TRANSPARENCY in developing and explaining the costs of the LPP and its long term financial impacts of the citizens of his area.
John	Browne	53	80	Climate Change and GHGs	Lastly, CLIMATE CHANGE is real. My laboratory in New Mexico worked on climate change computer models that contribute to the global assessments of the impact of greenhouse gases to the climate. I was personally involved in a review of the climate change policy for the American Physical society. Regardless of what you personally believe about global climate change, some change will occur regionally in the coming decades. How we monitor and plan for such changes MUST be a part of

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					the EIS so that we truly plan for contingencies based on potential climate change excursions. If the Colorado river flow declines, the LPP will deliver less water to everyone AND we will have to do more conservation to deal with that situation. Dealing with conservation NOW makes the most sense to me. The LPP timeline should be scoped with conservation in mind.
carl	granfors	54	81	Opinion - Opposed to Proposed Lake Powell Pipeline	This pipeline is a bad idea. The Colorado River water is already over allotted. As an owner of a water share in Kane County, this pipeline will force a financial burden on water rights owners also. Another plan for water for St. George must be explored. Than you for your time.
Wayne	Connors	55	82	Opinion - Opposed to Proposed Lake Powell Pipeline	It's nice to have a legacy that shows development in the area, but leave the existing residents out of it as they do not profit from more development. The Planning Dept is already overwhelmed with new development, increased traffic, and overloaded infrastructure.
Richard	Spotts	56	83	Request for Extended Comment Period	Indeed, please consider extending this comment period to give the public more time to respond after the holiday season.
Lukas	Brinkerhoff	57	84	Opinion - Opposed to Proposed Lake Powell Pipeline	Let's be honest, the USBR should be able to look back at its history and recognize that these types of projects are not a good idea. Washington County does not need more water. More water will only turn us into the next LA or Las Vegas, both cities that I can assure you no one who lives in this county wants to become. The only ones who will benefit from this project are the developers who will be allowed to continue to pave over our desert and build McMansions at an alarming pace. The county should instead implement water conservation tactics and limit development based on the water that is available to us at this time. Requiring current residents to pay for this project, as well as the tax payers at large, seems beyond ridiculous when it will be destroying the whole reason they live here. Please don't turn us into the next LA, learn from your history, bringing water to the desert from so far away is just a bad idea.

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Jason	Weber	58	85	Opinion - For Proposed Lake Powell Pipeline	I would like to voice my support for the proposed Lake Powell pipeline project. I believe that the proposal to be thoughtful and to properly mitigated the environmental concerns. The bottom line is that Southern Utah has a legal right to this water from the Colorado River. The water is needed to secure an economic future for the current and future residents of Southern Utah. Thank you for approving the plan.
Paul	Zuckerman	59	87	Water Resources	It is well documented that Utahns use more water per capita than any other state in the union. Further, Washington County, a desert community, uses the most water of any other in the state. Before supplying any additional water to this area, it would be logical, from a human nature perspective, to enact a tiered pricing system that charges consumers more for their water as their usage increases. Our state's present billing structure is tiered but to such a gradual degree as to make it ineffectual in controlling water usage or population growth. In comparison to surrounding western states, it can be described as virtually flat as consumption increases.
Paul	Zuckerman	59	88	Water Supply	A second concern of mine is the false notion that simply building an impressive pipeline will somehow create more water to pump. The Colorado River is already over prescribed by entities along its route and sure to provide less water to all stakeholders as climate change warms the western deserts. Utah believes that it is entitled, by the Colorado River Pact, to more of this dwindling supply. With the reality of less and less water to draw from, one could assume that the state sees this pipeline as designed to stake its claim to all other users regardless if it ever delivers a drop of water. The cost to taxpayers and the delicate environment is much too high merely to provide a symbolic claim of water rights.
Paul	Zuckerman	59	89	Other	Finally, the projected cost of this project, sure to increase after construction starts, will not be born solely by those in the county who hope to reap the benefits. The legislature and governor will predictably be forced to ask the entire state's population to shoulder the burden through added taxes. I for one do not want to pay for water I will not benefit from so that Washington County residents can water their landscapes and attract more users into an already untenable population of water users.

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Riki	Eastmond	60	90	Water Resources	Add a water conservation alternative to the EIS studies.
Riki	Eastmond	60	91	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.
Riki	Eastmond	60	92	Water Supply	Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states. ?? Determine the probability that the LPP's water right is highly secure for a permanent water project.
Riki	Eastmond	60	93	Climate Change and GHGs	Determine the high -probability long -term Colorado River flow for the LPP under a range of future climate conditions.
Riki	Eastmond	60	94	Other	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.
Riki	Eastmond	60	95	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP
Riki	Eastmond	60	96	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Riki	Eastmond	60	97	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS.

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Riki	Eastmond	60	98	NEPA Process	If the FERC studies are to be used in this EIS verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Preston	Fitts	61	99	Aquatic Invasive Species	The pipeline will be doomed from the start even if successfully completed due to invasive mussels currently in Powell. Annual maintenance to deter or kill them alone will be millions if not more.
Preston	Fitts	61	100	Water Law	And lastly, the pipeline is a mirage for future and current growth. There already ain't enough water for those in that specific southwest Utah region, and any water that might be deemed a relief due to the pipeline could never be annually relied upon but will sure -ably be counted on as collateral without guaranteed future existence.
JD	Rhea	62	101	Opinion - Opposed to Proposed Lake Powell Pipeline	Please DO NOT advance any of these incredibly wasteful plans. Water conservation is the one and only reasonable answer to ensuring southern Utah's long term supply while being a good steward of a precious resource.
Robert	MacCarthy	63	102	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to the Lake Powell Pipeline Project. Thje project is unsustainable ⁴ and would require an increase in fewes, water rates and taxes. The strategy should be based on conservation.
Tom	Curran	64	103	Water Resources	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. ? Washington and Kane counties are the largest per capita water users in the country.
Tom	Curran	64	104	Other	Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.
Tom	Curran	64	105	Water Resources	The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption
Betty and Ron	Marianetti	65	107	Alternatives	Add a water conservation alternative to the EIS studies.

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Betty and Ron	Marianetti	65	108	Other	Evaluate the costs and yields of major conservation methods.
Annie	Montague	66	109	Water Supply	The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption!
John	Knoblock	67	110	Opinion - Opposed to Proposed Lake Powell Pipeline	In my view, this project is a bad idea for many reasons. To name a few, the near complete lack of water conservation mindedness and projects in the St George area, 'last straw in first straw out' concept when the Colorado River runs short on water supply, the projected costs should be solely paid for by St George area residents in taxes and water rates, increasing water supply to a state that is the second driest state in the nation with amongst the lowest water rates in the nation, and the need for water in the Colorado River for downstream folks including Mexico.
Sarah	Stock	68	111	Purpose and Need	I see in the federal registry announcement regarding the LPP that "The pipeline would deliver up to 86,249 acre -feet of water from Lake Powell to Sand Hollow Reservoir. UBRW proposes building the LPP in order to bring a second source of water to Washington and Kane Counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability. " In previous applications, 82,249 acre -feet of water were destined for Sand Hollow and 4,000 acre - feet were destined for Kane County. Is this still the case? The statement above infers this might still be the case. Is there any way to read the updated application submitted to BOR by the UDWR in order to inform scoping comments?
Don and Marie-Claude	Lucas	69	112	Visual Resources	On a different view point, apart from the ugliness and disfigure that such enormous towers will bring, not just to the 3400w but all nearby properties, we think it is a shame and unprofessional step to allow new constructions right where these towers will be. Wherever we lived around the world, there was no construction permit given to build residential houses under electrical lines. Now it's the other way around. Build as many homes then place gigantic electrical lines afterwards across the habitations. We know for sure that the ions, the noise and the effects produced by these lines is totally detrimental to people's health. Many studies have been done on the subject,

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					studies that can be found on internet. Asthma, headaches, digestive troubles, etc are a fact. Is there a health department involved with these delicate findings?
Don and Marie-Claude	Lucas	69	113	Electric and Magnetic Fields	We wonder then why it HAS to be alongside the properties, disfiguring yards, making people sick, why not bury them? Cost? Why not move them East on the hill which would join the transfer station and not be so obvious.
Tim	Wernette	70	114	Water Supply	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.
Tim	Wernette	70	115	Water Resources	Washington and Kane counties are the largest per capita water users in the country.
Tim	Wernette	70	116	Other	Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.
Jerry	Salkowe	71	117	Water Supply	Washington and Kane Counties guzzle municipal water at more than twice the national average, because these water users have some of America's cheapest water rates. These cheap rates are achieved because Pipeline spending proponents collect taxes that artificially lower the price of water, thereby incentivizing water waste.
Jerry	Salkowe	71	118	Water Resources	In 2018, the Washington County Water District testified at the Utah Legislature that the agency plans to increase water rates by at least 300%. This increase will reduce water use by 150% to about 160 gpcd. With that reduction in water use, the pipeline will become irrelevant. The Washington County Water District claims the water it delivers is vital to growth, when in fact the vast majority of water it provides supports a wasteful use. Only 20% of the District's water deliveries are supplied to homes and businesses for necessary uses, while the other 80% is supplied to about 400 individual users as secondary water.
Jerry	Salkowe	71	119	General	Dennis Strong, former Director of the Utah Division of Water Resources and the man who helped initiate the proposed \$3.2 billion Lake Powell Pipeline, says the project could be avoided with basic landscaping changes in Washington County.
Bridgette	Meinhold	72	120	Opinion - Opposed to	If I understand it correctly, you are looking for comments currently on what should be analyzed in an EIS for the Lake Powell Pipeline. Firstly though, I do not support the Lake Powell Pipeline and believe that Washington County should be focused

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				Proposed Lake Powell Pipeline	more on what can be done to conserve water in the region rather than looking to outsource it from an already over-tapped river
Bridgette	Meinhold	72	121	Alternatives	-Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods. Western Resource Advocates’ “Local Waters Alternative,” is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analysis of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint using common sense measures. It is a better solution than the LPP’s water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty.
Bridgette	Meinhold	72	122	Water Resources	-Evaluate the costs and yields of major conservation methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water-wise landscaping, incentives to convert existing properties to water-wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc.
Bridgette	Meinhold	72	123	Water Supply	-Determine the high-probability of the long-term Colorado River flow for the LPP under a range of future climate conditions. Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources’s(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP’s water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water
Bridgette	Meinhold	72	124	Other	-Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents. The Truth in Lending Act of 1968 is a United

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					States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS.
Bridgette	Meinhold	72	125	NEPA Process	Reclamation should also consider analyzing in the EIS the following: ? i. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates. ? ii. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned. ? iii. Interest rates and accumulated totals over the duration of the loan ? iv. The impact of the payment methods on water use, and the impact of that on the water supply requirements ? v. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt. ? vi. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs.
Bridgette	Meinhold	72	126	Water Law	-Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long-term. Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water rights use all of Utah's recalculated Colorado River allocation that considers the high probability of long-term Colorado River declining flows. -Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LPP. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact.
Bridgette	Meinhold	72	127	NEPA Process	-It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately

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Bridgette	Meinhold	72	128	Aquatic Invasive Species	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River.
Nancy	Orr	73	129	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not go forward with the LPP, as it is an inefficient way to meet the water needs of Kane and Washington counties. Given that they are the largest water users per capita in the country, it sounds like conservation measures would go a long way to solving their water concerns. Restructuring the costs of water would bring about conservation by getting people's attention through their wallets.
Josh	Anthes	74	23	Water Law	I am writing you regarding the concerns for the Lake Powell Pipeline. It is completely ridiculous that this is even being considered. You cannot use more water than the river produces. There is already more decreed water rights than water available. How is it legal to take water out of the upper basin and give it to a drainage that goes into the lower basin? Does this water automatically become part of the allotment the lower basin gets?
Josh	Anthes	74	24	Aquatic Invasive Species	How do you plan on dealing with the Zebra Mussels?
Josh	Anthes	74	25	Renewable Energy	What are the long term plans for The Bureau Of Reclamation on the power generation at the Glen Canyon Dam? It is only a matter of time before the water level at the lake is too low to generate power
Carolyn	Borg	75	130	Opinion - Opposed to Proposed Lake Powell Pipeline	OPINION — Is public involvement important? Should the public have a reasonable opportunity to comment on government proposals that may affect them before decisions occur? Is it appropriate for government to try to sneak important matters past the public over the busy holiday season, or to withhold relevant information from public review? I know that our nation's politics have sadly become increasingly polarized, and our widening divisions now threaten the very foundation of our democratic republic. But I hope that most of us, as patriotic Americans, can agree on

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					the fundamental importance of public involvement. “We the people” are supposed to be in charge,
Carolyn	Borg	75	131	Opinion - Opposed to Proposed Lake Powell Pipeline	with a rational government of constitutional checks and balances that should make decisions in the public interest. Back on July 19, I wrote about significant issues affecting Washington County, and the importance of public involvement during the National Environmental Policy Act (NEPA) processes relating to those issues. It is often difficult to follow these NEPA processes because of ever-changing timetables and frequent surprises from agencies. For example, on the proposed Northern Corridor Highway NEPA, the public scoping process was originally supposed to begin in August, and then no later than mid-November. On the proposed Lake Powell Pipeline, Utah decided to withdraw the hydropower component, and thereby removed the Federal Energy Regulatory Commission as the NEPA lead agency. The NEPA then was transferred to the Interior Department, where it was announced that the Bureau of Reclamation would be the new NEPA lead agency. There are concerns that the Northern Corridor would renege on the county’s past commitment Both the Northern Corridor and Lake Powell Pipeline issues have been very controversial for many years. Among other things, there are concerns that the Northern Corridor would renege on the county’s past commitment to permanently protect the Red Cliffs Desert Reserve, harm the highest density population of threatened Mojave desert tortoises, and establish a dangerous national precedent by weakening protection for BLM’s Red Cliffs National Conservation Area. On the Lake Powell Pipeline, there are concerns not only about the potential environmental impacts but also about the huge financial risks of committing about three billion public dollars (including interest payments on debt) given the uncertainty of future Colorado River flows due to likely prolonged droughts from climate change and the associated future conflicts over those much reduced future supplies. What happens if we build the pipeline, incur the massive debt, and then the water does not come and we cannot pay off the debt? There has been great success in reducing per capita water use through incentives On both issues, alternatives are being put forward as feasible ways to avoid building the Northern Corridor or the Lake Powell Pipeline. On the Northern Corridor, Conserve Southwest Utah has already identified some preliminary alternatives that may fulfill

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					<p>transportation needs without jeopardizing the RCDR, NCA and tortoises. On the Lake Powell Pipeline, Conserve Southwest Utah, Western Resource Advocates, Utah Rivers Council and others, have identified what they believe to be much more reliable and affordable alternatives. For example, implementing a combination of already proven successful water conservation, efficiency and reclamation methods could obviate or at least greatly postpone the need for the LPP. In nearby Las Vegas, there has been great success in reducing per capita water use through incentives and advertising. An agency is not supposed to be arbitrary or capricious in making those decisions NEPA passed Congress with overwhelming bipartisan support and was signed into law by former President Nixon in 1970. It has the commendable purposes of directing federal agencies to take a “hard look” at proposed actions, fairly evaluate alternatives, analyze the environmental consequences of the proposed action and alternatives, and provide for meaningful public involvement. It is often said that the “heart” of NEPA is the alternatives analysis. “Scoping” at the beginning of the NEPA process is the best time for the public to raise alternatives to proposed actions. The agencies then decide whether to accept and carry forward those alternatives into the Draft Environmental Impact Statement for detailed analysis and comparison of impacts with the proposed action. If an agency decides not to carry forward an alternative, it must provide a reasonable</p>
Carolyn	Borg	75	132	Opinion - Opposed to Proposed Lake Powell Pipeline	<p>explanation for that decision. An agency is not supposed to be arbitrary or capricious in making those decisions, nor to demonstrate any bias favoring either supporters or opponents. With this NEPA background in mind, what happened on Dec. 5 and 6 was a shocking surprise, and frankly very disappointing. On Dec. 5, the Bureau of Land Management and Fish and Wildlife Service started the official NEPA public scoping comment period on the proposed Northern Corridor and related actions. The very next day, on Dec. 6, BOR started the official NEPA public scoping comment period on the proposed Lake Powell Pipeline. So, arguably the two most significant NEPA processes affecting Washington County in a decade or more are initiated almost simultaneously, with short overlapping comment periods, and during the busy holiday season between Thanksgiving and the New Year. They instead appear to be discouraging the required public involvement BLM, FWS and BOR are</p>

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					<p>“sister agencies” within the Interior Department. Ideally, they would have coordinated on these high-profile NEPA processes so that the scoping would be consecutive rather than concurrent, and to avoid the holiday season. If they truly wanted to encourage meaningful public involvement during NEPA scoping, that is what they should have done. Unfortunately, they instead appear to be discouraging the required public involvement. And BLM and FWS have not provided some important documents that should be available for review, especially the draft Habitat Conservation Plan and Incidental Take Permit which is part of the Northern Corridor NEPA. Of course, when you are given “lemons”, sometimes it is simply best to make “lemonade.” Despite the holidays, if you have concerns about either or both of these issues, please participate in scoping and submit your comments. Whether you care about tortoises and the viewshed above Saint George, or how your water bills and property taxes may skyrocket to pay off the Lake Powell Pipeline debt, your voice is needed. This is a pivotal time to speak to your government about how you want your money spent and your federal lands managed. You should not complain about problems with dysfunctional or even corrupt government if you remain silent. Regardless of our differing opinions, I believe that all patriotic Americans have a duty to be actively involved in solving those problems. Indeed, if you proudly salute the flag, then you should be willing to defend and advocate for what it stands for. Submitted by RICHARD SPOTTS, St. George.</p>
Carolyn	Borg	76	133	Opinion - Opposed to Proposed Lake Powell Pipeline	<p>The Lake Powell Pipeline is extremely controversial in Washington County. At related public meetings, in my experience, a clear majority of residents either oppose the LPP or express grave concerns about its potential exorbitant costs. I believe that influential business and construction interests are pushing the LPP for their short-term profits, and most local elected officials are essentially their shells. Fiscal conservatism in Utah's Dixie has sadly been replaced by private profits and political expediency.</p>
Carolyn	Borg	76	134	Alternatives	<p>If the LPP was indeed a good potential investment, why not make it contingent on attracting enough private investors to cover the associated massive debt and long-term interest payments? This is an alternative that should be NEPA analysed, but LPP proponents would not allow it because they know that most private investors are</p>

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					not that dumb, nor willing to risk their own money on a long shot bet. But the LPP proponents are more than willing to gamble with the public's money.
Carolyn	Borg	76	135	Opinion - Opposed to Proposed Lake Powell Pipeline	If the LPP was indeed a good potential investment, why not make it contingent on attracting enough private investors to cover the associated massive debt and long - term interest payments? This is an alternative that should be NEPA analysed, but LPP proponents would not allow it because they know that most private investors are not that dumb, nor willing to risk their own money on a long shot bet. But the LPP proponents are more than willing to gamble with the public's money.
Carolyn	Borg	77	1639	Request for Extended Comment Period	Finally, I believe that this scoping process may be unfair. The public is apparently expected to start over, and not carry forward their scoping comments to FERC from about a decade ago. However, I strongly suspect that the Lake Powell Pipeline proponents will be allowed to carry forward the results of many study reports to FERC and perhaps other previously -submitted information. If so, then this seems to be a double -standard that favors Lake Powell Pipeline proponents and thereby demonstrates improper pre -decisional bias by your agency
Carolyn	Borg	77	1640	General	I request that you review and include in the Lake Powell Pipeline NEPA scoping record my letter to the editor at the web page and pasted in below relating to the Lake Powell Pipeline. It was published on December 14th. I am very concerned with the ongoing, sleazy efforts of the Washington County Commissioners and other proponents of the Lake Powell Pipeline. I believe that they have a long pattern and continue to try every trick they can to circumvent adequate National Environmental Policy Act analysis, put undue pressure on federal officials, and hinder transparency and effective public involvement. As you know, public scoping began on December 5 for the Northern Corridor, and for the Lake Powell Pipeline on the next day, December 6. It is outrageous that these two highly -controversial proposals are both having scoping at basically the same 30 -day period over the holidays between Thanksgiving and the New Year. It seems obvious that your and
Carolyn	Borg	77	1641	General	other Interior Department agencies are being bullied by the Lake Powell Pipeline proponents to rush through the environmental analysis process and minimize genuine public involvement. I ask that you not allow yourselves to be "railroaded"

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					by the Lake Powell Pipeline proponents who want you to "rubber stamp" the Lake Powell Pipeline as soon as possible. You work for me and all other Americans, and federal lands and resources are at stake, so you should have enough backbone to stand up to these bullying tactics and ensure that the law and science are fully followed and respected. I am convinced that there are and should be much better alternatives that are likely cheaper and far less financially risky. Indeed, I believe that instituting tiered water pricing, eliminating the property tax subsidies, and establishing xeriscaping ordinances and incentives would combine to eliminate or greatly delay the purported need for the Lake Powell Pipeline. I therefore expect and request that the upcoming environmental analysis fairly and thoroughly evaluate these alternatives in terms of a comparison with the costs and impacts of the Lake Powell Pipeline. If this is not done, then it will be clear that the environmental analysis was defective and biased.
William	Belknap	78	136	Opinion - Opposed to Proposed Lake Powell Pipeline	Comparing residential water use in Washington County with that in Nevada's Southern Nevada Water Authority reveals that there is a great deal of conservation that could be achieved here. The EIS studies must include a comprehensive water conservation alternative. In reality the certainty of water to fill the Lake Powell pipeline resides only on paper, not the actual flow of the river. With credible forecasts of probable lower precipitation in the Colorado basin, it seems foolish to commit to such an expensive project now. Waiting until forecasts are more certain, conservation initiatives are achieved, and a larger tax base exists makes much more sense than committing now.
	saz	79	137	Opinion - For Proposed Lake Powell Pipeline	Then we need water pipelines to: -If you're going to run pipe to St George, might as well run up to Cedar City, Ut. -Lake Powell pipeline to Flagstaff and points south to communities on the rim like Winslow and Holbrook -Pipeline to Grants, New Mexico, then to farming communities south like Bluewater and Ramah. -Extend the new San Juan River pipeline from Gallup, NM, to Zuni, then St. Johns, AZ. -Pipeline from Colorado river to Monticello, Utah, then over to Cortez, Colorado.
Carolyn	Shelton	80	138	Alternatives	There should be a water conservation alternative to the EIS studies.

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Carolyn	Shelton	80	139	Visual Resources	The infrastructure proposed along the corridor, particularly inside the boundaries of Grand Staircase-Escalante National Monument's ROW - (remember, this Monument is under litigation), should be reduced in scale. It is too tall, industrial, and lit with non-dark night sky compatible lighting 24 hours a day. You are impacting the DARKEST place left in the continental U.S. THIS resource (dark skies) must be considered! You are also impacting by adding noise of these industrial substations. You are impacting the QUIETEST place left in the continental US. This resource (acoustics) must be considered!
Carolyn	Shelton	80	140	Climate Change and GHGs	With the inevitable advent of reduced water availability in the Colorado River, because of a warming climate (ooooh...scary...) this is a stupid proposal, clearly not future-thinking, and catering to greedy developers and politicians who somehow will get more powerful and wealthy.
Carolyn	Shelton	80	141	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Carolyn	Shelton	80	142	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Carolyn	Shelton	80	143	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Carolyn	Shelton	80	144	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Carolyn	Shelton	80	145	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.

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Carolyn	Shelton	80	146	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately
Warren	Wright	81	147	Water Supply	1. First and foremost is the very real likelihood that available water in the Colorado River will diminish substantially in the years and decades ahead
Warren	Wright	81	148	Water Resources	2. If you were sufficiently aware of the extravagant use and waste of water here in the St. George Metro-area, your focus would be on conservation much more than new supplies.
Warren	Wright	81	149	General	3. Whatever the proposed costs, they will without doubt be much more than the estimates.
Colleen	McMullen	82	150	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly oppose the proposed Lake Powell Pipeline because it would cause great harm to our water resources
Colleen	McMullen	82	151	T&E Species	Its construction would violate Washington County's commitment to permanently protect the Red Cliffs Desert Reserve. It would threaten the already endangered Mojave desert tortoises since it will cut directly through its densest population, and weaken the Bureau of Land Management's Red Cliffs National Conservation Area, setting a worrying precedent.
Colleen	McMullen	82	152	Water Supply	Further, the \$3 billion, taxpayer-funded pipeline is a dubious investment because the Colorado River -- on which it's dependent -- may be depleted as drought cycles become more severe.
Teresa	Crockett	83	412	Lands and Realty	Its construction would violate Washington County's commitment to permanently protect the Red Cliffs Desert Reserve.

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Teresa	Crockett	83	413	T&E Species	The Lake Powell Pipeline would threaten the already endangered Mojave desert tortoises since it will cut directly through its densest population,
Teresa	Crockett	83	414	Alternatives	There are many water conservation efforts that can and should be taken now to reduce or stave off the need for such a project.
Dirk	Douglass	84	153	Water Resources	It seems there is no water conservation effort from the St. George Water Company or price increases that I know about. Why is the Water Company not making sure people conserve water better and if they don't an easy way is to raise the price for water, that gets peoples attention. We have made sure our new house was zeroscaped with a few drippiness to the trees.
Dirk	Douglass	84	154	Request for Extended Comment Period	I also cannot believe you would ignore your own rules and change the public review process from 90 days to 30 days and make it during the holidays when people are busy (but i'm sure that was your plan all along)
matt	meinhold	85	155	Alternatives	Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods. Western Resource Advocates’ “Local Waters Alternative,” is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analysis of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint using common sense measures. It is a better solution than the LPP’s water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty
matt	meinhold	85	156	Water Supply	Evaluate the costs and yields of major conservation methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring waterwise landscaping, incentives to convert existing properties to water-wise

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					landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc
matt	meinhold	85	157	Climate Change and GHGs	Determine the high-probability of the long-term Colorado River flow for the LPP under a range of future climate conditions. Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources's(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP's water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water.
matt	meinhold	85	158	Other	-Determine how the specific LPP costs will be paid back to the state that also includes the
matt	meinhold	85	159	Other	tax burden on residents. The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS.
matt	meinhold	85	160	Other	Reclamation should also consider analyzing in the EIS the following: · i. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates. · ii. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned. · iii. Interest rates and accumulated totals over the duration of the loan · iv. The impact of the payment methods on water use, and the impact of that on the water supply requirements · v. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt. · vi. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs.

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matt	meinhold	85	161	Water Law	-Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long-term.
matt	meinhold	85	162	Water Law	-Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long-term.
matt	meinhold	85	163	Water Law	-Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LPP. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact
matt	meinhold	85	164	NEPA Process	-It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately
matt	meinhold	85	165	Aquatic Invasive Species	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River.
Paul R.	Cormier	86	415	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly oppose the proposed Lake Powell Pipeline, and I'm angry that the Department of the Interior would cram the public comment period in to the busy holiday season, knowing that more public involvement would mean only more opposition. The DoI works for the PUBLIC.
Paul R.	Cormier	86	416	Lands and Realty	Its construction would violate Washington County's commitment to permanently protect the Red Cliffs Desert Reserve.

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Paul R.	Cormier	86	417	T&E Species	It would threaten the already endangered Mojave desert tortoises since it will cut directly through its densest population, and weaken the Bureau of Land Management's Red Cliffs National Conservation Area, setting a worrying precedent
Gail and John	Richardson	87	166	T&E Species	The Mojave desert tortoise population, our shared natural heritage, is already in dire shape and this pipeline would cut through its prime and densest habitat.
Jack	Harlan, PhD	88	418	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly oppose the proposed Lake Powell Pipeline because it would cause great harm to our water resources. Its construction would violate Washington County's commitment to permanently protect the Red Cliffs Desert Reserve.
Jack	Harlan, PhD	88	419	T&E Species	It would threaten the already endangered Mojave desert tortoises since it will cut directly through its densest population, and weaken the Bureau of Land Management's Red Cliffs National Conservation Area, setting a worrying precedent.
Carol	Golichnik	89	260	Alternatives	Add a water conservation alternative to the EIS studies.Evaluate the costs and yields of major conservation methods.
Carol	Golichnik	89	261	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Carol	Golichnik	89	262	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Carol	Golichnik	89	263	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Carol	Golichnik	89	264	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Carol	Golichnik	89	265	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.

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Carol	Golichnik	89	266	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Carol	Golichnik	89	267	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Carol	Golichnik	89	268	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Becky and Chuck	Warren	90	269	Alternatives	Add a water conservation alternative to the EIS studies.Evaluate the costs and yields of major conservation methods.
Becky and Chuck	Warren	90	270	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Becky and Chuck	Warren	90	271	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Becky and Chuck	Warren	90	272	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Becky and Chuck	Warren	90	273	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Becky and Chuck	Warren	90	274	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition,

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					provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Becky and Chuck	Warren	90	275	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Becky and Chuck	Warren	90	276	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Becky and Chuck	Warren	90	277	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Nancy	Russell	91	168	Alternatives	We have presented and discussed comments on behalf of myself and over 250 homeowners all of whom signed letters that were sent to the Washington County Water Conservancy District (WCWCD), and the Utah Board of Water Resources (UBWR), requesting that they evaluate alternate alignmnets for the proposed LPPP "Sand Hollow to Dixie Springs Power Transmission Line." We are property owners in the community of Dixie Springs located just north of Sand Hollow Reservoir where the Lake Powell Pipeline (LPP), is planned to terminate in Hurricane, UT. We have presented and discussed alternate transmission line routes with representatives from the UBWR and WCWCD. The proposed installation of 69kV power transmission poles and lines on our residential lots within our ten foot general utility easements will have an enormous negative impact that cannot be overstated. I will not expand on those impacts herein.The focus on this letter is to propose once again for thorough evaluation, alternative woutes or solutions that we feel qualify as reasonable to meet the purpose and need of the applicants goals.

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Nancy	Russell	91	169	Alternatives	easements beginning at the southwest corner of Sand Hollow Reservoir that parallel Sand Hollow Road north all the way to substation #51. Alternate Route #1 would add approximately two miles of transmission line installation as compared to the proposed 3400 W route.
Nancy	Russell	91	170	Alternatives	MAP - SEE COMMENT PDF REPORT
Nancy	Russell	91	1642	Alternatives	Alternate Transmission Line Route #1. (Route #1 shown in the red on attached map). From the Hydropower station that would be located on the southern border of Sand Hollow Reservoir, the 69 kV line would be routed to the west along the southern border of Sand Hollow Stat Park paralleling the existing State Route 7 – Southern Parkway. At the junction of Sand Hollow Road, the lines would be routed north, paralleling Sand Hollow Road where overhead power lines exist along most of all that stretch. At an approximate distance of 1200 feet north of Dixie Springs Community, along a dirt power easement road, the power lines would run east directly to Dixie Power Station #51. Currently existing along this stretch of dirt easement road are two rows of parallel power poles and lines, one carrying distribution, and the other carrying transmission lines directly to substation #51 which is the targeted substation in the LPP proposal. Dixie Power is planning to replace those two existing rows of poles with a new single pole to support both distribution and transmission lines probably within the next two years. A significant advantage to Alternate Route #1, is that there are large areas of Washington County Water Conservancy District Lands, and existing power poles/
Nancy	Russell	91	1643	Alternatives	Alternate Transmission Line Route #2. (Route #2 shown in green on attached map). This alternative would route the transmission lines to the east from the hydropower station at Sand Hollow Reservoir, then paralleling the planned Southern Corridor (State Route 7), of which construction is scheduled to begin by Spring of 2020. Then from a point approximately one mile Northeast of Dixie Power Substation 51, this line could be routed west for approximately one mile and join existing 69kV poles/easements that run directly to Dixie Power Substation #51. The distance required to run new transmission lines from the Sand Hollow Hydropower Station and connect to Dixie’s Power’s existing lines adjacent to Substation 51 would

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					be approximately six miles. This would be 2.5 miles further than the proposed route up 3400 W.The Sand Hollow to Dixie Substation Transmission Line route in the proposed LPP plan would require about 3.4 miles of new lines. This route would entail difficult construction along a section of very steep terrain on the west slope of Sand Hollow Reservoir and would necessitate costly and invasive removal and replacement of multiple residential landscapes and sidewalk areas. The cost of these challenges could nullify some or all of the costs associated with an alternate alignment that would extend the distance required to run lines by approximately two miles.One other suggestion. We do understand that running transmission lines underground is a very costly alternative. What could be evaluated is a short underground segment that only spans 23400 West through Dixie Springs to the existing power poles on 3400 W just adjacent to Dixie Power Station #51 This underground span would be less than one mile long. If this short underground span is feasible it would solve a lot of problems.The alternate alignments that we have presented, or any alignment routing the transmission lines outside of Dixie Springs, would secure the wellbeing of our community and prevent the potential tragedy we fear is unfolding before us. We urge the agencies to require a thorough and objective evaluation of these and any other routing of the proposed transmission lines and adopt an alternative alignment.
Jim	Boone	92	171	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly oppose the proposed Lake Powell Pipeline because it would cause great harm to our water resources. Its construction would violate Washington County's commitment to permanently protect the Red Cliffs Desert Reserve. It would threaten the already endangered Mojave desert tortoises since it will cut directly through its densest population, and weaken the Bureau of Land Management's Red Cliffs National Conservation Area, setting a worrying precedent. Further, the \$3 billion, taxpayer-funded pipeline is a dubious investment because the Colorado River -- on which it's dependent -- may be depleted as drought cycles become more severe.
M. Honer-Orton & Robert W.	Orton	93	172	Request for Extended Comment Period	A 30 day comment period and one open house event in our area over a busy holiday season is not what we would call a public process. 60 days would be reasonable, 90 days better with open house events each month in the areas affected.

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M. Honer-Orton & Robert W.	Orton	93	173	Climate Change and GHGs	Climate change, water projections and water source report studies updated
M. Honer-Orton & Robert W.	Orton	93	174	Water Law	Is the water right secure? how? Is there sufficient water in the proposed exchange to complete the plan?
M. Honer-Orton & Robert W.	Orton	93	175	Water Supply	Evaluate the local water supply and environmental factors including climate science over the long term. Downstream effect of taking water from the already over-subscribed Colorado river.
M. Honer-Orton & Robert W.	Orton	93	176	Other	Costs of building the pipeline and who will pay and over what time period?
M. Honer-Orton & Robert W.	Orton	93	177	Aquatic Invasive Species	Risks of quagga mussel infestation transferring to other water facilities and supplies.
Katie	Fite	94	178	General	We request that BUREC fully assess the serious impact that public lands livestock grazing, and irrigation of private lands for livestock pasture and forage is having on causing desertification and loss of sustainable water flows across Colorado River systems. If the region is to effectively address the tremendous water over-allocation problem now made worse by Climate change stress, then it must take action to study and then formulate policies to stop unsustainable livestock-related water uses across this region.
frank	delrossi	95	179	Opinion - Opposed to Proposed Lake Powell Pipeline	J u s t s a y N O t o t h i s v e r y b a d i d e a c o n c e n t r a t e o n C o n s e r v a t i o n
Jessica	Fraver	96	362	Opinion - Opposed to	I strongly opposethe proposed Lake P o w e l l P i p e l i n e p r i m a r i l y b e c a u s e i t w o u l d c a u s e g r e a t h a r m t o o u r w a t e r r e s o u r c e s

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				Proposed Lake Powell Pipeline	
Dennis	Williams	97	180	Alternatives	With the increasing population we will continue to need more water for Utah. I have and continue to propose a tunnel such as the Duschene tunnel be created to divert water from Yellowstone Lake to the headwaters of the Snake River. It would then flow downstream and could be diverted into Utah from the American Falls, Idaho reservoir. I would only need to be pumped 200 to 300 feet as compared to the 2,000 feet needed to divert water to St. George. It could be used as a flood control to protect against flooding in the Missouri and Mississippi waterways as well as put more water into the Great Salt Lake and preserve the flyway for the birds, etc.
Carolyn	Borg	98	181	Alternatives	The LPP DEIS must therefore fully analyze a "comprehensive water conservation, reclamation, re-use, and groundwater recharge" alternative. This alternative would compare the combination of known successful water conservation, reclamation, re-use, and groundwater recharge methods to the LPP in terms of all economic, social, and environmental effects. This alternative should not be tainted by LPP proponents who will likely attempt to make this alternative seem unreasonable and draconian in terms of adverse impacts.
Carolyn	Borg	98	182	Water Resources	The LPP DEIS must also evaluate how better management of the Virgin River watershed could improve the reliability and quantity of available water. Much of this watershed is "flashy" during monsoonal storms in terms of rapid runoff, serious erosion, and associated deposits that reduce reservoir capacity. There is great potential to capture and slow the runoff of much of this water so that it can recharge aquifers or enhance surface storage. Slowing the runoff would have the added benefit of reducing soil erosion and sediment deposition. One way to do this would involve bringing back nature's "engineers": beavers. Beavers were historically abundant but nearly trapped out in the past. It is now difficult for them to return because of livestock grazing that prevents sufficient riparian vegetation which the beavers need to eat to survive. Grazing permits could be acquired, or riparian corridors could be fenced to exclude livestock, so that riparian vegetation could return. When it does, nuisance beavers elsewhere could be translocated into the Virgin River watershed's

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					perennial streams. Over time, the beaver dams and associated ponds would slow storm run-off, reduce erosion and sediment transport, and increase groundwater recharge. Storing water underground is much more efficient because surface storage is subject to massive evaporation losses, especially over the hot summer months. The costs associated with taking these actions, in terms of water saved and other benefits, should be relatively small compared with the costs of human constructed impoundments. In fact, this cost-benefit ratio should greatly outmatch anything that the LPP proponents could demonstrate.
Carolyn	Borg	98	1671	Aquatic Invasive Species	The LPP DEIS should evaluate the risk of invasive quagga mussels getting into the Virgin River system from the LPP, and what the ongoing costs of preventive treatments would be along with the likelihood of long-term success of those treatments. If these mussels get into the water systems of Washington and Kane counties, how much damage could they do and how much would this cost to remedy? Would homeowners, who already paid for the LPP through their water rates, property taxes, and perhaps impact fees, then be expected to pay to clean out their water pipes? Or would water rates and property taxes be increased to cover dealing with these infestations?
Jonathan	Upchurch	99	183	Water Resources	How will future fluctuations in the elevation of Lake Powell affect the engineering and economic feasibility of the pipeline? To accommodate potential future low Lake Powell elevations, will currently contemplated designs for water intake structures need to be redesigned, and what additional environmental effects will be associated with these changes? In a 1995 feasibility study (Lake Powell Pipeline Feasibility Study, Boyle Engineering Corporation & Alpha Engineering, Inc., March, 1995), it was assumed that the Lake Powell elevation would be between a minimum of 3580 and a maximum of 3710 feet. In about 2005 Lake Powell's elevation dropped considerably below that minimum, to a low of about 3550 feet.
Robert	Routsong	100	184	Other	What will the pipeline cost? Official estimate is between \$1.1 to \$1.8 billion. According to a joint study by economic and business university professors at Utah State, Utah and BYU, the pipeline is more likely to cost \$3 billion or more.

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Robert	Routsong	100	185	Other	Not included in #2 are the costs for the increase in infrastructure for roads, police, schools, etc. to support the increase of population. Paid by an increase in property taxes?
Robert	Routsong	100	186	Other	How and who will pay for the pipeline? It is my understanding it is proposed that the State of Utah will sell 15 year bonds with the money going into a State construction agency which pays bills. Once the pipeline completed the agency turns over assets and repayment responsibilities to the Washington county water conservancy district. As needed, they may buy water in blocks which goes back to the State as part of a 50 year contract. To pay for all this water rates would increase 15% and property taxes 10% per year. Plus a 75% impact fee. I believe all of this is preliminary and much needs to be determined. My concern is the financial impact on residents, including me, many of whom have come here to retire.
Robert	Routsong	100	187	Climate Change and GHGs	Will climate change perpetuate further drought in the upper states of Colorado, New Mexico, Utah and Wyoming which supplies water to Lake Powell? If further drought, will there be sufficient water to supply the pipeline plus the lower states of Nevada, Arizona, California plus the Mexico river delta? It is interesting to note that for over 5 months from June into November, St. George had no rain which perpetuates drought and supports the science of climate change.
Mort	Zachter	101	1644	Alternatives	I suggest the approach Israel has taken to its water challenge also be considered
Crista	Worthy	102	363	Opinion - Opposed to Proposed Lake Powell Pipeline	do NOT build this pipeline. It's time to get serious about water conservation.
Janice	Crompton	103	364	Opinion - Opposed to Proposed Lake Powell Pipeline	I say a resounding no to this project. What are you thinking?????
steve	hogseth	104	188	Opinion - Opposed to	Neither 1922 thinking nor pipeline is the answer. I am opposed to the LPP project. Thank you.

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				Proposed Lake Powell Pipeline	
Elliot	Hulet	105	189	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not allow this pipeline to be built.
Dorothy	Peters-Brannon	106	365	NEPA Process	the critical importance of having current data on which to base any decision, not FERC data a decade old
Dorothy	Peters-Brannon	106	366	Climate Change and GHGs	--attention to the reality of climate change affecting future Colorado River flow
Dorothy	Peters-Brannon	106	367	Alternatives	-examination of all possible local water sources
Dorothy	Peters-Brannon	106	368	Aquatic Invasive Species	consideration of the disastrous effect of quagga mussel infestation on water infrastructure
Dorothy	Peters-Brannon	106	369	Alternatives	And most of all, identify conservation methods to be undertaken before this sketchy multimillion dollar project is considered
LeaRae	Atwood	107	190	Opinion - Opposed to Proposed Lake Powell Pipeline	Please stop the Lake Powell Pipeline.
Paul	hyde	108	370	Opinion - Opposed to Proposed Lake Powell Pipeline	My advice is to stop spending money on this project and concentrate on projects that benefit the greater good
Konni	Hacking	109	371	Alternatives	I understand two very reasonable alternative paths for the power lines has been submitted. I would hope that these have been looked at and considered very seriously instead of down 3400 West. Please factor in the people of this neighborhood when you make your decision.

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	Nina	110	372	Alternatives	In all the years of this proposed Pipeline, I have never read or heard an alternate approach to obtaining this water. Utah has the Colorado River running through it in several locations on the State's Southern Border. Why don't we access the water directly from the river? A pipeline from the Colorado river would be closer, more affordable for both Kane and Washington County taxpayers whom will ultimately be saddled with the cost.
Karen	Monsen	111	191	Water Supply	Determine more accurate projections of local water use and population numbers
Karen	Monsen	111	192	Water Supply	Determine estimates of water savings due to potential conservation efforts
Karen	Monsen	111	193	Water Resources	Determine more accurate Colorado River flow projections and allocations
Karen	Monsen	111	194	Other	Identify how construction costs will be paid back or paid for and by whom
Karen	Monsen	111	195	Other	Identify operating costs and who will pay for the additional operating costs Identify the combined costs of construction and operation and who will pay those costs
Karen	Monsen	111	196	Biological Resources	Identify habitat loss and pollution estimates for proposed pipeline
Dave	Andersen	112	197	Opinion - Opposed to Proposed Lake Powell Pipeline	I am strongly opposed to the Lake Powell Pipeline Project until all other RESPONSIBLE and viable conservation and wise use of OUR water alternatives are planned, implemented and exhausted.
Natalie	Boles	113	198	Alternatives	I understand that there has been proposed, 3 different and very reasonable alternatives to the proposed placement of these specific power lines. Two of the reasonable alternatives were presented during public comments in mapped out routes presented to the Water District and the Utah Board of Water Resources to consider. Both of these routes would involve running the lines approximately two miles longer to reach the targeted power stations just north of Dixie Springs. Both routes would keep the power lines out of the Dixie Springs Neighborhood and would not run through any existing neighborhoods. I also understand that there are Power Lines

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					already in place in the alternative routes that would actually save cost on funding for this project. I also understand that the alternative routes will save cost on trying to install the power lines and poles on hillsides of the existing proposed plan. A third reasonable alternative is to bury these power lines under the street on 3400 West and continue with the proposed route in place. The distance to bury these lines would be less than a mile which makes this option reasonable as well.
Nancy	Goodell	114	199	Opinion - Opposed to Proposed Lake Powell Pipeline	I have sincere doubts that the Colorado River and Lake Powell can deliver the desired water supply, thus my argument to put conservation first in our efforts to satisfy the thirst generated by future development. I envision a scenario where a pipeline is built at great taxpayer expense to fuel the development needs of a few in the near term. In the slightly longer term, I envision taxpayers being stuck with the bill to pay for an obsolete pipeline as the Colorado flows decline
Laura	Cotts	115	278	Alternatives	Add a water conservation alternative to the EIS studies. Evaluate the costs and yields of major conservation methods.
Laura	Cotts	115	279	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Laura	Cotts	115	280	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Laura	Cotts	115	281	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Laura	Cotts	115	282	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Laura	Cotts	115	283	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.

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Laura	Cotts	115	284	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Laura	Cotts	115	285	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Laura	Cotts	115	286	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Julie & Jim	Hancock	116	287	Alternatives	Add a water conservation alternative to the EIS studies.Evaluate the costs and yields of major conservation methods.
Julie & Jim	Hancock	116	288	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Julie & Jim	Hancock	116	289	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Julie & Jim	Hancock	116	290	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Julie & Jim	Hancock	116	291	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Julie & Jim	Hancock	116	292	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition,

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					provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Julie & Jim	Hancock	116	293	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Julie & Jim	Hancock	116	294	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Julie & Jim	Hancock	116	295	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Jim	Jones	117	200	Water Law	This project appear to be an exercise in futility. The Colorado River is already over appropriated. Climate change is adversely impacting the existing supply of water and it is almost a certainty that the supply will continue to diminish over time. There is absolutely no way to provide an adequate water supply to operate or pay for the project. The proponents should be required to show the existence of a adequate senior water rights necessa
Sarah	Stock	118	201	General	I have a quick question regarding scoping comments for the LPP Project. How would prefer to receive supporting documents for the administrative record? I have an extensive list of files (PDFs mostly). I could send in a thumb drive or share a drop box link, or try to send them through the email, though there are quite a few.

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Carole	Straughn	119	202	Other	Do the ratepayers of Washington County actually need water from Lake Powell? Or could conservation and a change in landscaping culture around human dwellings suffice?
Carole	Straughn	119	203	Water Supply	Will there be enough water in Lake Powell to pipe to Washington County by the time the pipeline is built? What are the projections for the effects of the changing climate on water levels in the lake?
LAURA	JOHNSTON	120	204	Alternatives	Before such a step is taken, alternatives need to be studied. "Local Waters Alternative" is a good place to start as it outlines a plan to provide water to Washington County through 2060. It is practical and feasible; it is sustainable where the pipeline is not. When residents have been asked to step up and conserve, they respond positively.
Alice Burkhart	Butine	121	205	Alternatives	A proposed pipeline would affect the whole Southwest US, and water conservation ethics everywhere. Please add a water conservation alternative to the EIS studies and evaluate the costs and yields of major conservation methods.
Terry	Cochran	122	206	Opinion - Opposed to Proposed Lake Powell Pipeline	I am utterly and completely opposed to any project that further disturbs our natural resources or removes water from an already depleted river system.
David	Clark	123	207	Opinion - For Proposed Lake Powell Pipeline	Grateful of the foresight and vision of state leaders for going through this negotiation process to ensure residents have the water they need and diversify the water resources that residents currently enjoy. Southern Utah desperately needs to diversify its water resources from a sole source (Virgin River drainage). Like other communities throughout the State have done (i.e. SLC has 5 main sources). Water is the foundation of our economy.
Michalene A.	Bond	124	208	Electric and Magnetic Fields	I understand that two reasonable alternative routes have been discussed for these transmission lines. These alternatives add approximately 2 miles onto the system but they would run on the northside of Dixie Springs and would not go through any existing neighborhoods. I don't know what the cost would be, but I would guess it

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					will be less than defending thousands of lawsuits that may be coming your way from residents who will experience interference with their rights of their enjoyment when they had originally purchased in Dixie Springs as well and medical issues that may arise from the magnetic and electric fields the transmission lines may cause. The stress of this entire ordeal has weighed heavily on me especially coming shortly my husband's passing and the holidays.
Tisa	Zito	125	209	Water Supply	We live in a desert, perhaps the days of having a green lawn are over. On a regular basis as I walk through the neighborhood, I see lawns being over-watered which leads to the driveway, sidewalk, and road being watered as well. For a desert environment this is extremely les se faire. At the very least we owe it to our resources and fellow water shareholders (Wyoming, Colorado, New Mexico, California, Arizona and Nevada) to begin a responsible practice of treating water as it should be treated; as a limited, precious resource. The implementation of a pipeline should be second to a water cap
Betty	Marianetti	126	210	Alternatives	When we spend the Summers in Rochester N.Y. we live on Lake Ontario and there is much water to be had for all needs. The cost of water there is \$3.12 per 1,000 gallons. In Washington County the rate after the base change is slightly over \$1.00 for from 5,000 to 10,000. I would like to see our water rates here much higher to encourage conservation. We need to raise our water rates and protect the water that we do have!! We should give tax credits to all homes and businesses that have Desert Landscaping to encourage this being more wide spread in our area!!
Randy	Aton	127	211	Opinion - Opposed to Proposed Lake Powell Pipeline	As a resident, particularly one who will derive no benefit from the water delivered by this project, I strenuously object to this project. I am particularly concerned that a project like this is being proposed at a time when the whole Colorado River Compact is being renegotiated. Who can say with any certainty that when this project is completed the pipeline won't be sucking air instead of water from Lake Powell?
Jessica	Lisovsky	128	296	Alternatives	Add a water conservation alternative to the EIS studies. Evaluate the costs and yields of major conservation methods.

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Jessica	Lisovsky	128	297	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Jessica	Lisovsky	128	298	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Jessica	Lisovsky	128	299	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Jessica	Lisovsky	128	300	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Jessica	Lisovsky	128	301	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Jessica	Lisovsky	128	302	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Jessica	Lisovsky	128	303	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Jessica	Lisovsky	128	304	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.

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Leland	Wehland	129	212	Water Resources	1. The benefits that can be gained through waterconservation efforts
Leland	Wehland	129	213	Climate Change and GHGs	2. Impact of climate changes in the 3 to 100 year scenarios
Leland	Wehland	129	214	General	3. Population growth / loss projection of the region and its impact on the need for this project
Leland	Wehland	129	215	Biological Resources	4. Potential impact to the health of the involved environments including invasive plant sand animals spread via the pipeline
Dean	Heard	130	216	Water Supply	Put serious water conservation regulations in place that are realistic for an arid climate like Southern Utah. Currently conservation is only given lip service and not very good lip service at that. o Drastically increase the cost of purchasing water for all users as an incentive to conserve. ? In Juneau, Alaska I pay approximately \$180/month for water, sewer and garbage collection. In Ivins, Utah I pay approximately \$75/month for water, sewer, garbage collection and curbside recycling. Something is terribly wrong with these numbers and it's not the high cost of living in Alaska.Increase costs for initial water connections for new construction. o Adopt gray water options in local plumbing codes so some wastewater can be used for irrigation. o Revise plumbing codes to require low flow fixtures and circulating pumps in all new construction.Explore in detail the waste that occurs, as we have to treat our extremely hard water we are currently supplied by the Water District. ? Anyone with a water softener flushes large volumes of water down the drain in an attempt to increase the quality of their water. ? Anyone with a Reverse Osmosis system flushes 1 -5 gallons of water down the drain for every gallon of water they use.What are the environmental costs of these water -conditioning treatments that flush so much unutilized water down the drain while at the same time introducing huge quantities of various salts and other chemicals into treatment facilities? ? How are these residues dealt with? ? Are there more efficient means of treating the entire water supply at the delivery source rather than at tens of thousands of end user points? o Long term, residents must adopt new attitudes about water use and water waste. We live in a desert with a rapidly increasing population. We can't operate like in the old days when

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					it was no big deal to use flood irrigation to water a lawn and garden. Public education and increasing awareness of wise water usage must be included in any conservation efforts
Dean	Heard	130	217	Water Resources	Provide studies that show the long -term projections of reliable water supplies for Lake Powell and the Upper Colorado Basin, which would be the source for the Lake Powell Pipeline. o I remember a time in early 80’s during a big El Niño year when there was so much water in the Colorado Basin that water was flowing over the spillways at Hoover Dam. Looking at Lake Powell and Lake Mead today it is hard to imagine that ever happening again. A thorough analysis of water flow on the Colorado River taking into account a warming climate is vital. o Until accurate projections for a reliable water supply in the Upper Basis are in place, building a billion dollar pipeline make no economic sense. An expensive pipe line that has no reliable long -term source of water is just an expensive empty pipeline.
Marlene A.	Israel	131	218	Water Supply	While a few assorted folks have made an effort to conserve, there is no appreciable water conservation education going on in Kanab. I would urge the city and the KCWCD to take the lead to teach the residents about landscape, culinary, and home use practices that would cut down on the demand for water. I would also urge the Department of Interior to demand that those who propose the LPP project first make every effort to begin a massive conservation effort, not just in Kane and Washington counties, but throughout the Southwest.
Marlene A.	Israel	132	373	Water Supply	I’ve lived in Kanab for several years now, and what I’ve noticed is that water is “cheap.” For example, plenty of people “water their sidewalks” with overreaching sprinklers in an attempt to grow large, green lawns. They wash their cars every week. They don’t mind wasting water because it’s inexpensive and they haven’t been educated on the need to conserve water. In 2019, our own city council and KCWCD even recklessly voted to sell our surplus water to a sand-frac mining firm. (A significant, dedicated group of Kanab residents is working to overturn that project.)

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Marlene A.	Israel	132	374	Alternatives	I would also urge the Department of Interior to demand that those who propose the LPP project first make every effort to begin a massive conservation effort, not just in Kane and Washington counties, but throughout the Southwest.
Richard	Spotts	133	1645	Opinion - Opposed to Proposed Lake Powell Pipeline	I am a Washington County resident who opposes the LPP and fears taht, if approved, it may cause future water rights and property taxed to skyrocket
Chiska	Derr	134	219	NEPA Process	Obtain and use current water usage numbers. The FERC studies are over a decade old and so are their data. Many of those data are obsolete, unreliable and potentially misleading. Use the new, reduced population projections, the recommendations in the state's projections of water needs audit, the recent Department Water Resource study of higher conservation potential. If any old data are used, address all previously submitted concerns that were voiced when those data were new.
Chiska	Derr	134	220	Alternatives	Include a robust water conservation alternative in the EIS. Demonstrate how we can reduce the demand for water through a number of conservation methods. Incorporate information provided by Western Resource Advocates' "Local Waters Alternative," which outlines a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative.
Chiska	Derr	134	221	Water Supply	Include an analysis of treatment of our abundant ground water, and storm water capture.
Chiska	Derr	134	222	Water Supply	Evaluate the costs and yields of major conservation methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water -wise landscaping, incentives to convert existing properties to water -wise landscaping, use of secondary water instead of culinary water for landscape irrigation (require this change in all new developments).
Chiska	Derr	134	223	Biological Resources	Incentivize xeriscaping. Xeriscaping is landscaping using only plants that are adapted to survive in our desert. Look to Phoenix and other Arizona desert cities that conserve

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Chiska	Derr	134	224	Biological Resources	water and still have beautiful desert cities. There are lots of beautiful desert plants that can be used to keep Southwest Utah green without using water hogs like grass.
Chiska	Derr	134	225	Public Health and Safety	Change ordinances to force responsible water use by residents. For example I often see domestic sprinkler systems spraying water all over the sidewalk, on the street, and into gutters. Require homeowners and businesses to fix their systems. Consider providing tax or water rate incentives.
Chiska	Derr	134	226	Water Resources	Eliminate “lagoons” and other wastes of water. One argument for the pipeline I’ve heard is that the proposed development by Sun River and the Southern Parkway “has” to have the pipeline for its planned 17 lagoons. What a waste of water! Eliminate these proposed evaporative ponds from future development. Establish and enforce city ordinances and building codes that support wise water use. • Remove ponds and other existing water features from neighborhoods such as Padre Lakes subdivision. Enclose swimming pools and water parks to reduce evaporation, which wastes water at an enormous rate
Chiska	Derr	134	227	Aquatic Invasive Species	Analyze the costs associated with treating a possible infestation of quagga mussels and invasive plants into our regional pipeline from the proposed Lake Powell pipeline.
michael	kruse	135	228	Opinion - Opposed to Proposed Lake Powell Pipeline	The pipeline is a tremendous waste of taxpayer money, will not bring us more water because the Lake Powell is rapidly drying up and will only get worse as global heating increases.
TERRY	MASSOT H	136	229	Alternatives	About 30% of St. George’s culinary water is currently derived from the Navajo Sandstone aquifer, via two small water well fields (south of Gunlock and in Snow Canyon State Park) and a few other isolated water wells. Santa Clara, Washington City, and Hurricane also obtain percentages of their municipal water supply. Natural springs on the slopes of Pine Valley Mountain supplied another 10% of St. George water. Sixty percent was purchased from Quail Creek WTP+Sand Hollow+Virgin River. (https://waterrights.utah.gov/wateruse/WaterUseList.asp)The geologist in me suspects there are many magnitudes more recoverable water in the nearby Navajo Sandstone aquifer, versus the annual quantity proposed from the LPP.This Jurassic-

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					age rock water reservoir, which stretches from just north of St. George City, west past Motaqua, east pass Hurricane, and even extends underneath the Pine Valley Mountains into Iron County, some 800 sq miles in extent, can be more than 2000 ft thick. Assuming a conservative 15% rock porosity, and the above areal extent, there calculates more than 150,000,000 ac ft of trapped water held in the Navajo Sandstone. Compare this to the maximum capacities of Sand Hollow reservoir, Lake Powell, or Lake Meade of 50 thousand, 24 million, and 26 million ac ft, respectively. The U.S. and Utah Geological Surveys, and others, have extensively studied the Navajo Sandstone in the Virgin River basin since the 1970s. The water exists. It is of good quality. It is close by. It is not too deep. Most of the land above the aquifer is either BLM or National Forest lands. The costs of drilling new water wells on appropriate lands, and linking them with smaller diameter and much shorter-length gravity-fed pipelines than the proposed LPP, would be much less expensive, and developable much sooner than the LPP. Surely this local immense water source should be further developed in a sustainable way, not “mining the reservoir”, and I feel preferred over the LPP.
Craig	Wallentine	137	230	Water Supply	What are the water balance production and consumption projections/scenarios for Kane/Washington County water basin over the next 40 years? Specifically address the fact that housing for the increased local population will decrease farmable land thus freeing up local water supplies for high efficiency domestic use and that more cost efficient drip irrigation technology is commercially available today which can support high profit margin agriculture production with lower water consumption. It seems improbable that the analysis will show that water will need to be imported into Kane/Washington County for decades at the earliest.
Craig	Wallentine	137	231	Water Supply	What is the urban water conservation plan for the area served by the Lake Powell Pipeline? Specifically show how Kane/Washington County consumers will achieve proven levels of water conservation as demonstrated in Tucson, Phoenix, Las Vegas, Albuquerque, Los Angeles and other relevant peer cities by 2030 - 2040. Show that cost of water conservation in primary and secondary water domestic use is significantly cheaper for Kane/Washington consumers than having to pay for their private pipeline.

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Craig	Wallentine	137	232	Other	Please study the use of volume driven water fees versus property tax subsidies for water users. Utah is far behind the rest of the country in not using tiered water pricing based on actual usage. Document the benefits of when all users (private, industrial and non-taxable organizations) actually pay for the water they used based on the volume consumed.
Craig	Wallentine	137	233	Water Resources	Given the availability of "home-grown" water supplies as farm land is consumed by urban and industrial sprawl in Kane/Washington county and that local domestic and agricultural users can achieve peer water conservation levels using existing technology, specifically show when in the next 40 years when external water sources might actually needed for Kane/Washington County. Please show the savings on interest costs from deferring construction on unneeded pipelines.
Craig	Wallentine	137	234	Travel Management	Please document the infrastructure and pumping costs for lifting water from the Colorado River to Kane/Washington county. Since there will be no power recovery from this pumping operation please outline the fifty year financials for building infrastructure that will not be used for decades, where the power will come from and who will pay for it.
Craig	Wallentine	137	235	Climate Change and GHGs	Please study the impact of climate change and the scenarios by which there is no water available for the LPP. Document how much the Kane/Washington County consumers will pay for an empty pipeline and unused infrastructure.
Craig	Wallentine	137	236	Other	Most importantly, please document the fact that Kane/Washington county users must pay 100% of the cost of the Lake Powell Pipeline without any contribution from federal taxpayers or Utah taxpayers. If Kane/Washington County water users want to vote to provide billions of their own dollars on unneeded pipeline in order to water local politician's ranches and to provide corporate welfare to privately held local construction companies then this scoping study should show Kane/Washington consumers exactly how much they are going to have to pay since they will not receive financial support from outside their counties.
Craig	Wallentine	137	237	Other	Please document what cost effective water conservation programs might be subsidized by the federal taxpayers and Utah taxpayers if Kane/Washington County

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
					voters choose to follow the path of other Southwestern US cities in becoming a water conservation model and thus eliminate the need for the LPP.
Ron and Yvonne	Carter	138	305	Alternatives	Add a water conservation alternative to the EIS studies.Evaluate the costs and yields of major conservation methods.
Ron and Yvonne	Carter	138	306	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Ron and Yvonne	Carter	138	307	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Ron and Yvonne	Carter	138	308	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Sandra	Webb	139	238	Opinion - Opposed to Proposed Lake Powell Pipeline	I a m a g a i n s t t h e L P P a n d w o u l d l i k e t o s u b m i t t h e f o l l o w i n g t h o u g h t s / c o m m e n t s
Doug	Watts	140	239	Opinion - Opposed to Proposed Lake Powell Pipeline	I h a v e b e e n a r e s i d e n t o f W a s h i n g t o n C o u n t y s i n c e 1 9 8 5. I a m n o t s u r e w h a t y o u a r e g o i n g t o d o w i t h o u t w a t e r. W a t e r d e l i v e r y i n t h e f u t u r e w i l l b e d o n e m u c h l i k e g a s p i p i n g. W e n e e d t o g e t o n b o a r d t h e t r a i n R e s t r i c t i n g p o p u l a t i o n g r o w t h i s a n e c o n o m i c d e a l k i l l e r. S o w h a t ' s t h e q u e s t i o n h e r e?
Latimer	Smith	141	1646	Water Supply	t h e p r o p o s e d p i p e l i n e w o u l d m o s t c e r t a i n l y i n c r e a s e o u r o v e r - d e p e n d a n c e o n t h e C o l o r a d o R i v e r.
James A.	Lemmon	142	240	Opinion - For Proposed Lake Powell Pipeline	T o W h o m I t M a y C o n c e r n: I h a v e b e e n a W a s h i n g t o n C o u n t y r e s i d e n t s i n c e b i r t h. I h a v e s e e n w h a t w a t e r m e a n s t o o u r a r e a. I h a v e b e e n t h r u w a t e r r a t i o n i n g. W e d e f i n i t e l y n e e d t h i s p i p e l i n e a n d n o t b e s e l f i s h a b o u t n o t w a n t i n g t o h e l p o t h e r s.
Jeanine	Kuhn-Coker	143	241	Opinion - Opposed to	T h e p i p e l i n e i s a v e r y b a d i d e a. I a m v e r y m u c h o p p o s e d!!

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				Proposed Lake Powell Pipeline	
Michael A.	Bond	144	242	Alternatives	I understand that two reasonable alternative routes have been discussed for these transmission lines. These alternatives add approximately 2 miles onto the system but they would run on the northside of Dixie Springs and would not go through any existing neighborhoods. I don't know what the cost would be, but I would guess it will be less than defending thousands of lawsuits that may be coming your way from residents who will experience interference with their rights of their enjoyment when they had originally purchased in Dixie Springs as well and medical issues that may arise from the magnetic and electric fields the transmission lines may cause. The stress of this entire ordeal has weighed heavily on me especially coming shortly my husband's passing and the holidays.
Isabel	Quilantan	145	243	Other	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.
Isabel	Quilantan	145	244	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Michael	Heyman	146	245	Opinion - Opposed to Proposed Lake Powell Pipeline	We also do not do enough analysis of treatment of our abundant underground water and storm water capture, such as that may be. These measures would result in a more sustainable water supply for the future. These types of approaches seem far more conservative than than the LPP water supply which is vulnerable to rising temperatures with less stream flows, political conflict, community controversy, and possibly worst of all, the uncertainty of how we will ever repay what remains a massive yet undisclosed cost to us, the residents of Washington County.

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Tom	Butine	147	246	Climate Change and GHGs	The security of LPP's water right considering senior rights and decreasing river flows. Analyses of climate impacts on the river indicate future flows could be in the range of 9 MAFY, as opposed to the 15 MAFY that the BOR and compact states seems to assume it will flow in the future. This is unrealistic. It appears likely that all basin states will be required to significantly reduce their use of the river over the next 50 years, and that Utah's use may currently be more than that future allocation will be, not even counting the LPP. It is not realistic to assume Utah will be able to support the LPP with its future allocation. The EIS should include an analysis indicating there is an extremely high probability (98%+) that the river can support it over the next 100 years.
Tom	Butine	147	247	Water Law	There are no contingency plans in place for the case of a reduction in Utah's Colorado River allocation and senior water rights exhaustion of that allocation. The EIS should determine how the LPP will operate under these conditions as they are likely to occur and should require that a plan be put in place for this mode of operation .
Tom	Butine	147	248	Water Supply	The EIS should determine the effectiveness, efficiencies and economics of LPP operations at various levels of capacity, for example, determining the O&M procedures and financing payments if the LPP is operating at 25 or 50% capacity. Estimates given by the WCWCD have varied widely. A realistic projected future water supply estimate should be established in order to determine possible populations that could be supported without external water .
Tom	Butine	147	249	Alternatives	Studies submitted by the UDWRE in support of the FERC licensing process were filled with errors on the costs and yields of water conservation methods and on realistic water demand goals. Their studies since then have also been filled in incomplete analyses and errors (e.g. Utah Regional Water Conservation Goals – see Analysis of Utah's Water Conservation Goals). These should be corrected and supported by independent data and analyses. A viable alternative, several years old now and in need of update, has been submitted (The Local Waters Alternative). The basic concept is valid. While water agencies have identified issues, they refuse to discuss them in any detail or to resolve them.

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Tom	Butine	147	250	Water Resources	Water demand objectives should be defined using normalized comparisons to water-wise communities in other states and using verified yields of conservation methods. It appears that Washington County uses far more water than comparable communities (Water Use Comparisons). The WCWCD and the UDWRe continue to resist normalizing data for comparisons. The UDWRe produced a set of water conservation goals/objectives that seem wildly pessimistic about what could actually be achieved. They solicited comments from the public, and I supplied a detailed Analysis of Utah's Water Conservation Goals . Promises from the UDWRe of a review and discussion have not been met.
Tom	Butine	147	251	Other	All cost comparisons between conservation methods and the LPP should include the cost of interest and be independently verified. Most if not all conservation methods can be incrementally implemented, avoiding large debt and the associated large interest accrual.
Tom	Butine	147	252	Water Supply	It appears that Utah and Washington County do not take water conservation seriously, despite their advertising. The DWRe's guidance for water conservation plans does not even meet the very basic requirements defined in the state law, and water districts and municipalities follow the DWRe's guidance. They fall woefully short of program and project planning standards commonly used in industry. In fact, they cannot be classified as plans at all since they include no definition of action. Even if they contained such action definitions, they do not have management mechanisms in place to execute the plans and account for their outcomes. This should be characterized as mis-management. I developed an Analysis of Water Conservation Guidelines and Plans , presented it to both water agencies, along with a proposal to implement real planning for water management and water conservation, yet with no response. The EIS should include a study of planning processes and their impact on future water demand. An Analysis of Washington County Water Conservation Expenses indicates very low expenditure on water conservation, and none on active conservation measures, indicating a definite lack of commitment.
Tom	Butine	147	253	Other	Determine the effect of the increased cost of water on the demand, and determine that impact on the plan to pay for O&M and financing costs. Analyze Washington

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					County's sources of revenue for water and determine how suited it is to encouraging water conservation. My analysis resulted in Proposal for Water Revenue which was presented to the WCWCD Board for consideration. There has been no response.
Edward Duke	Breitenbach; PhD	148	314	Alternatives	Add a water conservation alternative to the EIS studies. Evaluate the costs and yields of major conservation methods.
Edward Duke	Breitenbach; PhD	148	315	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Edward Duke	Breitenbach; PhD	148	316	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Edward Duke	Breitenbach; PhD	148	317	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Edward Duke	Breitenbach; PhD	148	318	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Edward Duke	Breitenbach; PhD	148	319	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Edward Duke	Breitenbach; PhD	148	320	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Edward Duke	Breitenbach; PhD	148	321	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
					Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Edward Duke	Breitenbach; PhD	148	322	NEPA Process	previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately.
Karen	Goodfellow	149	323	Alternatives	Add a water conservation alternative to the EIS studies.Evaluate the costs and yields of major conservation methods.
Karen	Goodfellow	149	324	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Karen	Goodfellow	149	325	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Karen	Goodfellow	149	326	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Karen	Goodfellow	149	327	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Karen	Goodfellow	149	328	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Karen	Goodfellow	149	329	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.

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Karen	Goodfellow	149	330	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Karen	Goodfellow	149	331	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Paul	Tramontano	150	1647	Water Supply	Please determine the high probability long term colorado river flow for the LPP under a range of future climate conditions
Bret	Goodfellow	151	256	Aquatic Invasive Species	Why are quagga mussels an issue They clog water delivery pipes, resulting in millions of dollars in extra maintenance costs that eventually are passed on to taxpayers. They impact fisheries by removing large amounts of beneficial plankton from the water, making this important food source unavailable to other aquatic organisms. This impacts the entire food chain all the way up to top fish predators, like bass. They pollute shorelines and ruin beaches by covering them with their sharp shells. The shells eventually decompose, releasing a foul odor. They damage boats and equipment by using their byssal threads to attach to these areas. They are famous for clogging engine intakes on boats motors, causing a great deal of damage, and some times even ruining motors.
Melanie	Florence	152	332	Alternatives	Add a water conservation alternative to the EIS studies. Evaluate the costs and yields of major conservation methods.
Melanie	Florence	152	333	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Melanie	Florence	152	334	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.

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Melanie	Florence	152	335	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Melanie	Florence	152	336	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Melanie	Florence	152	337	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Melanie	Florence	152	338	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Melanie	Florence	152	339	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Melanie	Florence	152	340	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Jason	Weber	153	375	Opinion - For Proposed Lake Powell Pipeline	This project is obviously critical to a mid-sized population center that is far too reliant on a dwindling Virgin River water supply
Dr Sky	Chaney	154	257	Socioeconomics	The issue of the financing the pipeline needs to be specifically addressed in the study, because the monetary impact of this project will affect other key outcomes including economic and social impacts on our relatively small community. How will the project affect building impact fees, local taxes, water fees, and other associated harges that

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					will be paid by Kane County residents? This is the information that taxpayers and the public need to know. Also, how may this pipeline project impact families throughout the State of Utah?
Dr Sky	Chaney	154	258	Alternatives	More economical alternatives for meeting current and future water demands need to be researched and included in the study. In their study, FERC found that building a potable water treatment plant was a much more economical way for Kane County to provide water for the future, than buying into the Lake Powell pipeline. Various practices associated with water conservation can also be implemented as a study alternative. Please include these economical alternatives to the pipepline in your study.
Dr Sky	Chaney	154	259	Water Supply	A more thorough examination of existing and potential local water sources needs to be completed. The study needs to address whether Kane County really needs this pipeline. Mike Noel and the Kane County Water Conservancy District have told the public that our county needs water from the LPP for future growth, but other information indicated that this is not true. The Lake Powell Pipeline Water Needs Assessment published by the Utah Department of Natural Resources in August 2008 reported that over the next 50 years Kane County has no need for water from the LPP.
Tracie	Kirkham	155	378	Alternatives	Mr. Dennis Strong, formally the Department of Natural Resources- Department Head of Division of Water Resources, recommends that through water conservation, efficiency, and better decisions about the water management in the St. George area, they will have sufficient water supplies to meet their projected needs.
Tracie	Kirkham	155	381	Climate Change and GHGs	Scientists overwhelmingly agree that climate change is already decreasing the Colorado River water supplies, is becoming warmer and increasing water demand on the system. I question if there will sufficient water supplies in the future to meet the increasing demand.
Tracie	Kirkham	155	383	Biological Resources	The environmental degradation of construction, operational, and maintenance of this 140-mile pipeline would be very damaging to the fragile desert ecosystem and the

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					species that exist along the designated alignment, not to mention the endangered fish species in the Colorado River System.
Tracie	Kirkham	155	386	Socioeconomics	The amount of 33 million of dollars of taxpayer dollars, that have already been spent on the various permits and licensing requirements as per the ownership of the land, including Federal, including the Bureau of Reclamation and Kaibab Paiute Indian Reservation, State, and local agencies. The immense cost of using dozens of pump stations to transfer the water up-gradient causes yet, another vulnerability for this project. It is also irresponsible of the State of Utah to increase state taxes to pay for such a costly project that is likely to not produce the amount of water that the Washington County Water Conservancy is planning to receive from the project.
Tracie	Kirkham	156	377	Alternatives	Mr. Dennis Strong, formally the Department of Natural Resources- Department Head of Division of Water Resources, recommends that through water conservation, efficiency, and better decisions about the water management in the St. George area, they will have sufficient water supplies to meet their projected needs.
Tracie	Kirkham	156	379	Climate Change and GHGs	Scientists overwhelmingly agree that climate change is already decreasing the Colorado River water supplies, is becoming warmer and increasing water demand on the system. I question if there will sufficient water supplies in the future to meet the increasing demand.
Tracie	Kirkham	156	384	Biological Resources	The environmental degradation of construction, operational, and maintenance of this 140-mile pipeline would be very damaging to the fragile desert ecosystem and the species that exist along the designated alignment, not to mention the endangered fish species in the Colorado River System.
Tracie	Kirkham	156	387	Socioeconomics	The amount of 33 million of dollars of taxpayer dollars, that have already been spent on the various permits and licensing requirements as per the ownership of the land, including Federal, including the Bureau of Reclamation and Kaibab Paiute Indian Reservation, State, and local agencies. The immense cost of using dozens of pump stations to transfer the water up-gradient causes yet, another vulnerability for this project. It is also irresponsible of the State of Utah to increase state taxes to pay for

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					such a costly project that is likely to not produce the amount of water that the Washington County Water Conservancy is planning to receive from the project.
Keith	Forrest	157	359	Climate Change and GHGs	Other states are already having to cut use of the river owing to climate driven flow declines. Those declines — and their associated water shortages — are forecast to worsen in the future with regional drying and climate disruption. Prudent policy today affords flexibility in future water management. In this case, that means keeping those 28 billion gallons available for downstream ecosystems and endangered species, including in the Grand Canyon.
Keith	Forrest	157	360	Alternatives	The EIS should evaluate all plan alternatives against worst-case scenarios for future water availability across 10, 20, 50 and 100 year time lines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems—including national wildlife refuges and critical habitats—and endangered species. The analysis should be based on the best available science and climate models. Further, if Utah wants to be obsessed with fueling population growth, it will have to prioritize water conservation, not river destruction.
Tracie	Kirkham	328	376	Alternatives	Mr. Dennis Strong, formally the Department of Natural Resources- Department Head of Division of Water Resources, recommends that through water conservation, efficiency, and better decisions about the water management in the St. George area, they will have sufficient water supplies to meet their projected needs.
Tracie	Kirkham	328	380	Climate Change and GHGs	Scientists overwhelmingly agree that climate change is already decreasing the Colorado River water supplies, is becoming warmer and increasing water demand on the system. I question if there will sufficient water supplies in the future to meet the increasing demand.
Tracie	Kirkham	328	382	Biological Resources	The environmental degradation of construction, operational, and maintenance of this 140-mile pipeline would be very damaging to the fragile desert ecosystem and the

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					species that exist along the designated alignment, not to mention the endangered fish species in the Colorado River System.
Tracie	Kirkham	328	385	Socioeconomics	The amount of 33 million of dollars of taxpayer dollars, that have already been spent on the various permits and licensing requirements as per the ownership of the land, including Federal, including the Bureau of Reclamation and Kaibab Paiute Indian Reservation, State, and local agencies. The immense cost of using dozens of pump stations to transfer the water up-gradient causes yet, another vulnerability for this project. It is also irresponsible of the State of Utah to increase state taxes to pay for such a costly project that is likely to not produce the amount of water that the Washington County Water Conservancy is planning to receive from the project.
Blake		329	388	Socioeconomics	I also know personally one economist that did some of the preliminary cost projections on the LPP. He came up with a much much higher figure than the three billion dollars that is being used to try to sell this boondoggle to the people of southern Utah. His conservative estimate was twelve billion dollars.
Blake		329	389	Aquatic Invasive Species	Second, I believe it is very likely that Quaga Muscles would eventually render the LPP useless as well as introducing them into our now Quaga free water system. This could end up compromising the water we do have.
Andrew	Kramer	330	1648	Other	Because all Utah taxpayers would be required to subsidize the proposed Lake Powell Pipeline, we deserve to be informed. With its considerable cost and far reaching consequences, the LPP requires sound decision making based on reliable data. Unfortunately, studies by the DWR and WCWCDA are incomplete and misleading - biased in support of development interests that disregard fact-based rational conclusions. After thirteen years and \$34+ million in DWR studies, we still don't have accurate cost estimates for construction and maintenance of the pipeline, increased water rates and property taxes, nor a reasonable means of financing the pipeline. Moreover, the critical question of whether alternative solutions would make the pipeline unnecessary has been avoided by these agencies. By contrast, reliable information is found in a comprehensive study by 21 Utah economists dated 10/26/15 and the 2015 Utah Legislative Audi

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					<p>to of the DWR studies. Their most important findings show:</p> <p>A) DWR studies are deceptive: Example: Per the economists’ analysis, based on estimated construction costs (\$1.4 billion low, \$1.8 billion high), water rates would increase 57.6% to 67.8%. With these high rates demand would decrease 62% to 64% when much of the LPP water would go unused. The DWR study did not account for decreased use and decreased revenues, a major oversight. B) Conservation combined with developing untapped water sources makes the pipeline unnecessary. Per the Audit, Washington County has some of the highest water use in the nation. Its current conservation goal will not change that. To exaggerate the need for the pipeline, its proponents refuse to promote realistic conservation. At most, the WCWCD plan to reduce use to 243 GPCD (gallons per capita per day) by 2060. This compares with Pima County, AZ, that uses 165 GPCD and Albuquerque that uses 127 GPCD. The Audit found that Washington County has untapped water sources that were ignored in the studies (another major oversight). By developing these sources and implementing reasonable conservation, the auditors noted, “the need for the LPP becomes questionable”. A study by Western Resources Advocates proves that untapped sources can be developed incrementally as needed at a fraction of the cost. Combined with conservation, Washington County would “meet projected water needs in a reliable, flexible, and cost effective manner through the year 2060” without the pipeline. C) The LPP is cost prohibitive: The economists’ study includes an extensive analysis of costs, financing and bond repayment scenarios for the \$1.4 and \$1.8 billion estimates. None of these scenarios offer a reasonable plan for financing the pipeline. The repayment plan favored by DWR and WCWCD, which requires state subsidies, “would defer paying interest on the entire project, leaving the State of Utah holding billions of dollars of debt for an indeterminate amount of time.” This would impact the</p>

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					tate's credit rating and impose an unacceptable burden on all Utah taxpayers and future generations.
michael	baker	331	390	Opinion - Opposed to Proposed Lake Powell Pipeline	As a Utah taxpayer, I DO NOT want my tax dollars to be spent of this ridiculous project! Thank you for considering my feedback.
steven	summers	332	391	Opinion - Opposed to Proposed Lake Powell Pipeline	There is simply not enough water to make the pipe line work. Throw in the m u s s e l s , a n d t h e h o r r i f i c c o s t s a n d I s a y t h e p i p e l i n e i s a n o n s t a r t e r .
Jean	Lown	333	1649	General	As a family e c o n o m i s t a n d t a x p a y e r , I a m h o r r i f i e d b y t h e p r o p o s a l t o s p e n d b i l l i o n s o n t h e p r o p o s e d L a k e P o w e l l P i p e l i n e w h e n t h e C o l o r a d o R i v e r i s a l r e a d y o v e r a l l o c a t e d . T h e a t t i t u d e s t o w a r d w a t e r u s e i n W a s h i n g t o n C o u n t y s e e m t o r e f l e c t a 2 0 t h c e n t u r y a p p r o a c h t o l a n d s c a p i n g a n d w a t e r u s e . I w a s s h o c k e d t o s e e g r a s s b e i n g w a t e r e d a t C h r i s t m a s t i m e ! T o o m a n y l a w n i r r i g a t i o n s y s t e m s r u n a l l w i n t e r l o n g . A l t h o u g h m o s t y a r d s m a y b e s m a l l , i t i s s u r p r i s i n g t o s e e a l l t h e g r a s s l a n d s c a p i n g . C u m u l a t i v e l y , a s e v e n n e w h o m e s a r e b e i n g l a n d s c a p e d w i t h g r a s s , t h e a c r e s o f g r e e n g r a s s r e q u i r i n g s u b s t a n t i a l i r r i g a t i o n g r o w e a c h y e a r . S h o c k i n g l y , m a n y l a w n i r r i g a t i o n s y s t e m s a r e o f t h e v e r y i n e f f i c i e n t t y p e t h a t p u t o u t a m i s t w h i c h r e a d i l y e v a p o r a t e s , e v e n w h e n t h e w i n d i s n ' t b l o w i n g . D i x i e S t a t e U n i v e r s i t y h a s e x t e n s i v e l a w n s w i t h v i r t u a l l y n o x e r i s c a p i n g . E v e n i f t h e l a w n s a r e w a t e r e d w i t h r e c y c l e d w a t e r , t h e y s e n d t h e m e s s a g e t h a t g r e e n g r a s s i s a p p r o p r i a t e i n t h e d e s e r t . T h e s a m e a p p l i e s t o m a n y p u b l i c b u i l d i n g s . X e r i s c a p i n g i s s u s t a i n a b l e , a t t r a c t i v e (a s s h o w n b y t h e R e d H i l l s D e s e r t G a r d e n) , w a t e r w i s e a n d r e q u i r e s f a r l e s s u p k e e p t h a n g r a s s w h i c h m u s t b e w a t e r e d , m o w e d , f e r t i l i z e d , a n d r e p e a t a d i n f i n i t u m . D e s e r t l a n d s c a p i n g i n T u c s o n a n d o t h e r a r i d c i t i e s i s a t t r a c t i v e , h e l p i n g t h o s e c o m m u n i t i e s u s e h a l f t h e p e r c a p i t a w a t e r u s e o f W a s h i n g t o n C o u n t y . H a v i n g a t t e n d e d n u m e r o u s p u b l i c m e e t i n g s o n t h e L P P p r o p o s a l a n d r e a d v a r i o u s a s s e s s m e n t s , I u n d e r s t a n d t h e s o - c a l l e d " w a t e r r i g h t " i s j u n i o r t o e x i s t i n g w a t e r r i g h t s . T h e w a t e r s i m p l y i s

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					no t currently available in the C o l o r a d o R i v e r a n d t h e f l o w i s l i k e l y t o d e c r e a s e i n t h e f u t u r e d u e t o c l i m a t e d i s r u p t i o n . T h u s , a w a t e r r i g h t o n p a p e r i s w o r t h l e s s . T h e C o l o r a d o r i v e r w a t e r i s a l r e a d y o v e r a l l o c a t e d a n d W a s h i n g t o n C o u n t y h a s f a r l e s s p o w e r t o e n f o r c e a j u n i o r w a t e r r i g h t t h a n L a s V e g a s , L a s A n g e l e s , S a n D i e g o , P h o e n i x , a n d o t h e r m a j o r p o w e r f u l c i t i e s . I s t r o n g l y o p p o s e s p e n d i n g a n y m o r e t a x d o l l a r s o n t h e L P P u n t i l w e h a v e m o r e d a t a o n t h e f l o w i n g q u e s t i o n s : H o w w i l l L P P c o s t s b e p a i d b a c k t o t h e s t a t e ? W h a t w i l l b e t h e t a x b u r d e n o n r e s i d e n t s o f U t a h a n d W a s h i n g t o n C o u n t y ? H o w l i k e l y i s i t t h a t t a x p a y e r s (a n d t h e i r l e g i s l a t o r s) i n t h e r e s t o f t h e s t a t e w i l l b e w i l l i n g t o a s s u m e a m a s s i v e t a x b u r d e n f r o m w h i c h t h e y w i l l h a v e n o b e n e f i t ? L a k e P o w e l l i s a l r e a d y i n f e s t e d w i t h q u a g g a m u s s e l s w h i c h w o u l d p l u g u p t h e p i p e l i n e ; H o w c a n a n y o n e g u a r a n t e e t h a t t h i s p r o b l e m c o u l d b e a v o i d e d o r m i t i g a t e d w i t h o u t c o n s i d e r a b l e a d d i t i o n a l , l o n g t e r m c o s t s ? T i n y m u s s e l s w i l l b e i n t r o d u c e d i n t o t h e V i r g i n R i v e r ; w h a t t h e n ? I u n d e r s t a n d t
Chad	Spector	334	392	Opinion - Opposed to Proposed Lake Powell Pipeline	As a resident of the Dixie Springs neighborhood the routing of the final transmissi o n l i n e s a r e o f g r e a t c o n c e r n . W h e n t h e p r o j e c t w a s f i r s t a p p r o v e d a n d e a s e m e n t s e s t a b l i s h e d t h e r e s i d e n t i a l d e v e l o p m e n t t h a t n o w l i e s d i r e c t l y i n t h e p a t h o f t h e s e l i n e s d i d n o t e x i s t . U n f o r t u n a t e l y t h e r e i s n o w f a i r l y h i g h d e n s i t y r e s i d e n t i a l o c c u p a t i o n a n d t h u s t h e e a s e m e n t f o r t r a n s m i s s i o n l i n e s i s n o l o n g e r a n a p p r o p r i a t e s o l u t i o n . F o r t u n a t e l y a l t e r n a t e o p t i o n a b o u n d a n d w e ' d l o v e t o s e e t h a t b e i n g t a k e n i n t o c o n s i d e r a t i o n .
Matthew	Topham	335	393	Alternatives	e. W o u l d n ' t t h e s i m p l e s t s o l u t i o n t o o u r w a t e r p r o b l e m b e t o h a v e l o c a l a g e n c i e s r a i s e w a t e r r a t e s n o w t o s e e h o w m u c h d e m a n d c h a n g e s i n s t e a d o f j u s t g o i n g a h e a d w i t h a \$ 1.5 b i l l i o n , 1 4 0 m i l e - l o n g p i p e l i n e ? A d d i t i o n o f b u i l d i n g c o d e s t h a t r e q u i r e w a t e r - s m a r t c o n s t r u c t i o n a n d l a n d s c a p i n g w o u l d f u r t h e r l i m i t w a t e r u s e t o a p o i n t t h a t m i g h t m e e t t h e a r e a ' s f u t u r e w a t e r n e e d s w i t h o u t f u r t h e r d e p l e t i n g a n a l r e a d y b u r d e n e d C o l o r a d o R i v e r .

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Matthew	Topham	335	394	Alternatives	Add a water conservation alternative to your environmental impact study. Evaluate the costs and yields of major conservation methods that have been undertaken by cities such as Tucson, Arizona (considered a regional leader in water conservation)
Matthew	Topham	335	395	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.
Matthew	Topham	335	396	Socioeconomics	Determine how the specific pipeline costs (short and long term) will be paid back to the state, including the tax burden on residents.
Gretchen	Semerad	336	1672	Alternatives	I request that the EIS include a conservation alternative that would reduce the demand for water through a combination of conservation options. Western Resource Advocates "Local Waters Alternative" could be used as a model for a comprehensive approach that provides a flexible, cost effective pathway for Washington County to meet its water needs. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint. The costs and yields of major conservation methods such as tiered water use rates, weighting water revenue sources toward usage rates, requiring water-wise landscaping in building codes, creating incentives to convert existing properties to water-wise landscaping, and using secondary water instead of culinary water for landscape irrigation in all new developments should be evaluated.
Gretchen	Semerad	336	1673	Alternatives	The analysis of alternatives should include updated, current information such as the recommendations in the state audit of the state's water needs projections, the more recent lower population projections, the recent Department of Water Resources study of higher conservation potential, and the consideration of all water supplies in Kane and Washington Counties
Gretchen	Semerad	336	1674	Alternatives	The analysis of alternatives should also include a determination of the projected long-term Colorado River flow for the Lake Powell Pipeline (LPP) under a range of future climate conditions. Data on Lake Powell water levels that Utah Board Water Resources (UBWR) can continue to draw from when Lake Powell water is declining

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					should be included. What is the risk of disruption to water for the LPP due to Lake Powell Dropping below the power pool elevation? In addition, an analysis of the LPP's junior water right status should be included: what is the possibility of water diversions to the LPP being disrupted as water levels drop in Lake Powell, and who has senior rights to the remaining water?
Carla	Tuke	337	350	Alternatives	Add a water conservation alternative to the EIS studies. Evaluate the costs and yields of major conservation methods.
Carla	Tuke	337	351	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states.
Carla	Tuke	337	352	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Carla	Tuke	337	353	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Carla	Tuke	337	354	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Carla	Tuke	337	355	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Carla	Tuke	337	356	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.

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Carla	Tuke	337	357	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Carla	Tuke	337	358	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Linda	Wohlgemuth	338	397	Alternatives	Water conservation alternatives should be added to the EIS studies.
Linda	Wohlgemuth	338	398	Climate Change and GHGs	In the study, the long-term Colorado River flow needs to be considered for all future climate conditions. Living near the headwaters of the Colorado River, I see more drought and a trend of less snowpack each year. With climate change, there may not be enough water to make it to the pipeline in the future.
Neena	Bauer	339	399	Opinion - Opposed to Proposed Lake Powell Pipeline	I am against constructing the pipeline, generally agreeing with all the concerns of the Conserve Southwest Utah organisation.
Sandy	Whitley	340	400	Alternatives	My first question is in regard to whatkinds of water conservation efforts have been made by Kane and Washington counties. Research indicate that Washington county has the highest water usage rate in the West. Rather than invest in a hugely expensive pipeline project, It would seem a good first step would be to institute conservation efforts in these counties which could include rathe tin g d o w n p e r s o n a l u s e a n d m o r e r e p r u d e n t o u t d o o r l a n d s c a p i n g a n d i r r i g a t i o n p r a c t i c e s .
Sandy	Whitley	340	401	Climate Change and GHGs	Secondly, the Colorado River is already stressed and overused. Climate change has been contributing to less of a snow pack in the mountain drainages of the River and

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					levels at Lake Powell are historically low already. This stressed river provides sustenance to millions of people. The LPP diversion would cause even more stress.
Richard	Spotts	341	402	NEPA Process	Please review and print this article for the Lake Powell Pipeline NEPA scoping file https://m.lasvegassun.com/news/2020/jan/06/advocate-colorado-river-basin-states-need-to-cut-water/
Doug and Lynn	Pope	342	403	Electric and Magnetic Fields	I would encourage you to reconsider the benefit of the alternative routes that have been studied. It seems they would have much less impact on current residents of Dixie Springs. If the decision is made to continue placing these high powered lines down 3400 West, we will have no recourse but to join a group class action law suit. The stress of worrying about health issues, having to move and whether or not we will be able to move is now an issue.
Marlynne	Pike	343	404	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not plan to put this crazy long pipeline across Utah. The Colorado River is already so depleted, and there is nothing left at the end of it.
Nancy	Von Allmen	518	1650	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not plan to put this crazy long pipeline across Utah. The Colorado River is already so depleted, and there is nothing left at the end of it. Please stop the very short sighted approach to water that is such a habit of this Trump Administration. Let's help supply water to Native American peoples further downstream and to the very thirsty environment.
Andrew	Muro	519	405	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. ? Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. ? Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. ? The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.

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Richard	Spotts	522	406	NEPA Process	Please review and print for inclusion in the LPP NEPA scoping file this email and the excellent LPP related op -ed published in today's Deseret News, at the web site and pasted in below https://www.deseret.com/opinion/2020/1/7/21051946/guest-opinion-constituents-respond-to-washington-county-elected-officials-on-lake-powell-pipeline
Eve	Tallman	523	407	Opinion - Opposed to Proposed Lake Powell Pipeline	I echo the comments in opposition to the needless boondoggle of the proposed pipeline.
Ken	Kohler	524	408	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powel Pipeline will cost taxpayers way more than they may receive kin benefits.. It will only benefit development interest in an area that is rapidly becoming a megalopolis. The harmful effects will be astronomical.
Jack		525	409	Opinion - Opposed to Proposed Lake Powell Pipeline	Consider that when it is complete there may not be enough water in the lake. Sounds like a dumb idea
Tad	Flanigan	526	1651	Opinion - Opposed to Proposed Lake Powell Pipeline	The lake Powell pipeline doesn't need to be be built. Find better ways to spend our money
Carleton	DeTar	528	410	Alternatives	Please tell Washington County to implement conservation measures and a realistic rate structure first. Tell Washington County, further, to produce a plan for paying for the pipeline itself without burdening those of us who will not benefit.
Tom		529	411	Opinion - Opposed to Proposed Lake Powell Pipeline	I am not in support of this pipeline. This is crazy. How can the agency justify diverting more water from dwindling resource? A resource that is projected to continue dwindling.

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Beth	Blattenberger	531	526	Opinion - Opposed to Proposed Lake Powell Pipeline	While various previous studies have already shown the above statements to be true, it is essential that an EIS take the above considerations into account in addressing all alternatives, including a conservation alternative
katholoch@comcast.net		532	527	Biological Resources	1. Potential for interruption of animal migratory corridors.2. Impacts to special - status and endangered species (plants and animals).3. Habitat fragmentation
katholoch@comcast.net		532	528	Native American Concerns	4. Impacts to tribal cultural resources.5. Impacts to historic and cultural resources
katholoch@comcast.net		532	529	Water Resources	6. Impacts/loss of water resources for users/states that rely on the Colorado River. Please include analysis of the water budgets for users with valid water rights to this water.7. Hydrology impacts to Lake Powell, including biology impacts due to changes in water levels.
katholoch@comcast.net		532	530	Climate Change and GHGs	8. Climate change. Lake Powell water levels are affected by the weather and climate change and have been dropping.
katholoch@comcast.net		532	531	Socioeconomics	9. Socioeconomic impacts, including farming, ranching, and recreational dollars generated in this area, including Lake Powell.
katholoch@comcast.net		532	532	Environmental Justice	10. Environmental justice impacts, particularly related to tribes in the area.
Marjorie	Gendler	533	534	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly oppose the Lake Powell pipeline

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Tristan	Helzer	534	535	Opinion - Opposed to Proposed Lake Powell Pipeline	For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward.
John	Knoblock	535	536	Opinion - Opposed to Proposed Lake Powell Pipeline	I vote no on the proposed Lake Powell Pipeline project.
Raphael	Cordray	536	537	Water Supply	There is not enough water in the Colorado River system to reasonably believe that the water will be in Lake Powell in 10, 20 or 50 years. If there is no water, there is no way to help pay back the project.
Raphael	Cordray	536	538	Climate Change and GHGs	Projections of climate change are not being fully incorporated into studying the water availability for this project. The climate crisis already drying the river, forcing other states to cut use, that water's needed downstream—for vulnerable ecosystems, endangered species, and tens of millions of people.
Raphael	Cordray	536	539	Other	Utah tax payers will be backing up the loans for the LPP (potentially without interest!). If the user fees do not pay the bills because of water conservation efforts or a lack of water, or because of recession or slow growth, or because the state decides to charge interests, Washington County will not be able to pay back the debt to state. This could bankrupt Utah, not just Washington County
Raphael	Cordray	536	540	Native American Concerns	If this pipeline is built it is doubtful there is enough water to meet the water rights obligations of the native tribes, which have senior water rights that have yet to be developed. Thus, it is a huge social justice issue.
Raphael	Cordray	536	541	Climate Change and GHGs	This water will not flow through the turbines at Glen Canyon Dam so there is a loss of clean energy in a time of carbon driven climate change and a big impact on our rural power grid.
Raphael	Cordray	536	543	Water Law	This is Upper Basin water being transferred into the lower basin even if it is used in Utah. The Virgin River system is considered part of the lower basin since it drains into Lake Mead below Lee's Ferry. Is this legal? By what document?

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Raphael	Cordray	536	544	Aquatic Invasive Species	Invasive mussels have infested Lake Powell at great cost to contain them and keep the machinery clean, how will they ensure that they don't infest Sand Hollow Reservoir and why aren't they accounting for the cost of containment?
Tim	Wernette	537	546	Opinion - Opposed to Proposed Lake Powell Pipeline	Please oppose the Lake Powell pipeline proposal for the following reasons: ? The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. ? Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. ? Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. ? The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption
Tom	Butine	538	548	Water Law	1. The security of LPP's water right considering senior rights and decreasing river flows Analyses of climate impacts on the river indicate future flows could be in the range of 9 MAFY, as opposed to the 15 MAFY that the BOR and compact states apparently assume it will flow in the future. This is unrealistic. It appears likely that all basin states will be required to significantly reduce their use of the river over the next 50 years, and that Utah's use may currently be more than its future allocation will be, not even counting the LPP. It is not realistic to assume Utah will be able to support the LPP with its future allocation. The EIS should include an analysis indicating there is an extremely high probability (98%+) that the river can support it over the next 100 years.Contingency planning for exhaustion of Utah's allocations There are no contingency plans in place for the case of a reduction in Utah's Colorado River allocation and senior water rights exhaustion of that allocation. The EIS should determine how the LPP will operate under these conditions as they are likely to occur and should require that a plan be put in place for this mode of operation
Tom	Butine	538	551	Water Supply	The EIS should determine the effectiveness, efficiencies and economics of LPP operations at various levels of capacity, for example, determining the O&M procedures and financing payments if the LPP is operating at 25 or 50% capacity.The projected future local water supply Estimates given by the Washington County Water Conservancy District (WCWCD) have varied widely. A realistic projected future

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					water supply estimate should be established in order to determine possible populations that could be supported without external water.
Tom	Butine	538	553	Alternatives	Substantive, honest analysis of water conservation as an alternative to the LPP Studies submitted by the Utah Division of Water Resources (UDWRe) in support of the FERC licensing process were filled with errors on the costs and yields of water conservation methods and on realistic water demand goals. Their studies since then have also been filled in incomplete analyses and errors (e.g. Utah Regional Water Conservation Goals – see Analysis of Utah's Water Conservation Goals). These should be corrected and supported by independent data and analyses. A viable alternative, several years old now and in need of update, has been submitted (The Local Waters Alternative). The basic concept is valid. While water agencies have identified issues, they refuse to discuss them in any detail or to resolve them. Setting reasonable water conservation objectives Water demand objectives should be defined using normalized comparisons to water -wise communities in other states and using verified yields of conservation methods. It appears that Washington County uses far more water than comparable communities (Water Use Comparisons). The WCWCD and the UDWRe continue to resist normalizing data for comparisons. The UDWRe produced a set of water conservation goals/objectives that seem wildly pessimistic about what could actually be achieved. They solicited comments from the public, and I supplied a detailed Analysis of Utah's Water Conservation Goals . Promises from the UDWRe of a review and discussion have not been met.
Tom	Butine	538	554	Other	Financing, R epayment and Economics All cost comparisons between conservation methods and the LPP should include the cost of interest and be independently verified. Most if not all conservation methods can be incrementally implemented, avoiding large debt and the associated large interest accrual. Existing cost comparisons made by the DWRe and the WCWCD have included inflated costs for conservation and did not include the large LPP interest costs. There have been various analyses for the structure of the LPP cost repayment, many with significant differences. These analyses should be resolved in the EIS . There have been many issues with the financing model referenced by the DWRe and the WCWCD. Several Utah university professors have found issue with the model and have requested a

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					public resolution of the issues which has so far been refused by the DWRe and WCWCD. I identified Issues with the WCWCD LPP Financial Model when it was first introduced several years ago and met with the WCWCD to discuss it. While they were not prepared to discuss specific issues, they agreed to a transparent peer review of the model prior to using it. That agreement was not honored.
Tom	Butine	538	555	Alternatives	It appears that Utah and Washington County do not take water conservation seriously, despite their advertising. The DWRe’s guidance for water conservation plans does not even meet the very basic requirements defined in the state law, and water districts and municipalities follow the DWRe’s guidance. They fall woefully short of program and project planning standards commonly used in industry. In fact, they cannot be classified as plans at all since they include no definition of action. Even if they contained such action definitions, they do not have management mechanisms in place to execute the plans and account for their outcomes. This should be characterized as mis -management. I developed an Analysis of Water Conservation Guidelines and Plans , presented it to both water agencies, along with a proposal to implement real planning for water management and water conservation, yet with no response. I presented a Water Management Planning Approach to Utah ’ s Executive Water Finance Board, UDWRe and the WCWCD, identifying the significant issues with Utah ’ s current approach to water conservation management and proposed a common process to properly manage water as a vital resource, again with no active response. The EIS should include a study of planning processes and their impact on future water demand. An Analysis of Washington County Water Conservation Expenses indicates very low expenditure on water conservation, and none on active conservation measures, indicating a definite lack of commitment.
Tom	Butine	538	556	General	Application of the “Ripeness” doctrine Determine if a logical Position on the LPP indicates that a decision on the LPP is appropriate to make at this time. This position on the LPP has been shared with the Utah Board of Water Resources, the Utah Division of Water Resources, and the Board of the Washington County Water Conservancy District. They have been asked to review and comment on it, with no response. My opinion is that the conditions defined in the position paper are currently not met and cannot be met. The DEIS should determine if that is true.

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Tom	Butine	538	557	Other	Impact of water price elasticity Determine the effect of the increased cost of water due to repayment of the LPP costs on the demand for water, and determine that impact on the plan to pay for O&M and financing costs. 11. Revenue Sources Analyze Washington County's sources of revenue for water and determine how suited it is to encouraging water conservation. My analysis resulted in Proposal for Water Revenue which was presented to the WCWCD Board for consideration. There has been no response .
Dan	Heffernan	539	558	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.
Frank	Colver	540	712	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.
Kim	Despain	541	713	Alternatives	Why not tap into the water table that has been building up since the last ice age from water coming off Pine Valley Mountain and the mountains east of I -15 and use the water from that source instead of taking it from Lake Powell and putting it into a pipe line to Washington and Kane counties.
Kim	Despain	541	714	Alternatives	Take the water from lake Mead Instead. The elevation gradient would be less and the pipeline distance less also. Put a dam in the Virgin River Canyon and use the water from that instead of taking it from Lake Powell. If Lake Powell dries up where will the water come from?
Michael	Plyler	542	715	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.

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Margaret	A Sharp	543	716	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.
angela	mallard	544	717	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do the RIGHT THING and quit wasting taxpayer money pushing this wrongfully -imagined project forward.
Gerard	Belli	545	718	Opinion - Opposed to Proposed Lake Powell Pipeline	To Whom it May Concern,I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway
michael	quigley	546	719	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.
C.	Dart Thalman	547	720	Opinion - Opposed to Proposed Lake Powell Pipeline	In conclusion, I believe the Lake Powell Pipeline project shouldnot be allowed to move forward.
Marion	Klaus	548	722	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. The CO River cannot sustainably provide water for this project.
Laura	Harper	549	723	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.

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Carla	Tuke	550	724	Opinion - Opposed to Proposed Lake Powell Pipeline	For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward.
Suez	Jacobson	551	727	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to ask you to reconsider the idea of building the Lake Powell Pipeline Project.
Sandra	Zelasko	552	728	Opinion - Opposed to Proposed Lake Powell Pipeline	This is a crazy idea! The Colorado River is already over allocated. It is ludicrous to think you could take more water from the river via Lake Powell. We should all be reducing our dependance on the earth resources such as FRESH WATER! Washington County, UT should NOT BE BUILDING more housing. WATER IS LIMITED!
Anthony	Hind	553	729	Opinion - Opposed to Proposed Lake Powell Pipeline	Please, please, please do not do this pipeline. Water is our greatest resource.
patrick	conley	554	731	Opinion - Opposed to Proposed Lake Powell Pipeline	This pipeline idea needs to be permanently shelved! Thanks for your time.
Derek	Siver	555	732	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.
Bob	Plachta	556	1652	General	Sent from Yahoo Mail for iPad

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Francoise	Hibbs	559	734	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to oppose the construction of Lake Powell pipeline. The Colorado River must be preserved. St George must limit its overconsumption of water. thanks for saying NO to the project.
Robert	Anglin	560	736	Alternatives	Add a water conservation alternative to the EIS studies . ? Evaluate the costs and yields of major conservation methods
Robert	Anglin	560	737	Water Supply	Determine the high -probability long -term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties .Determine a reasonable and exemplary water use rate in comparison to other water -wise communities in other states .
Robert	Anglin	560	738	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project .
Robert	Anglin	560	741	Climate Change and GHGs	Determine the high -probability long -term Colorado River flow for the LPP under a range of future climate conditions .
Robert	Anglin	560	742	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents .
Robert	Anglin	560	743	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Robert	Anglin	560	744	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early

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					life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Robert	Anglin	560	745	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all
Robert	Anglin	560	746	NEPA Process	previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Tana	Hunter	561	747	Opinion - Opposed to Proposed Lake Powell Pipeline	I think it's a terrible idea for the following reasons:
Bill	Rivers	562	750	Opinion - Opposed to Proposed Lake Powell Pipeline	My opinion is: with that kind of money, build more reservoirs, higher in the mountains or high plains, add some state parks for the people, help Mother Nature filter the water naturally, without chlorine.
isabelle		563	751	Opinion - Opposed to Proposed Lake Powell Pipeline	What an incredibly stupid waste of money.
Vicki	Turner	566	753	Opinion - Opposed to Proposed Lake Powell Pipeline	I believe the LPP should not be allowed to move forward. Thank you for considering my comments

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raspotts2@gmail.com		567	754	Opinion - Opposed to Proposed Lake Powell Pipeline	FYI - Please note the LPP and NEPA references in the op -ed at the web link below. I share these concerns. Thanks!
KARIN	T KIRCHH OFF	568	755	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to the pipeline.
Dean	ELGER	569	757	Alternatives	I believe we should exhaust water conservation efforts before embarking on a short term, expensive and ultimately failed solution.
Trey	Brown	570	758	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.
lukas@moo seknuckleral liance.org		571	760	Opinion - Opposed to Proposed Lake Powell Pipeline	First and foremost, it is important to know that no one in Southern Utah wants this pipeline. It will cost a fortune and it's only benefit goes to the developers and construction companies building house for people who should not be moving to a desert. We don't want more people and we certainly don't need more water. It's obvious where this ends and it is with suburban sprawl. The same that can be seen in countless desert communities that have sold the reason people ever wanted to live there for a little money that cost a fortune in subsidized water and only benefited the few
Alison	Godlewski	572	762	Opinion - Opposed to Proposed Lake Powell Pipeline	I firmly believe the Lake Powell Pipeline project should not be permitted to move forward.

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Suzanne	Stensaas	573	763	Opinion - Opposed to Proposed Lake Powell Pipeline	For years citizens, scientists, economists, conservationists, and water experts have indicated that this pipeline is not needed, is more expensive than we think, and that water conservation can handle lots of it. Facts matter, please read them and see this is not necessary. Why do we have to go through this again?
Charles	Kasper	574	765	Opinion - Opposed to Proposed Lake Powell Pipeline	We love St. George and want to protect its standards, which are what make it an exceptional community.
Nickie	Stocks	575	769	Opinion - Opposed to Proposed Lake Powell Pipeline	This pipeline is not what we need. We need local government officials to put a stop to the excess of homes, subdivisions being built
Bob	Plachta	576	770	Opinion - Opposed to Proposed Lake Powell Pipeline	I oppose the proposed Lake Powell pipeline.
Harry	Newell	577	771	Opinion - Opposed to Proposed Lake Powell Pipeline	This project is a greedy overreach that should never have achieved even this stage of consideration. It's said that thirst can make one go mad. Well, this is a crazy idea, that deserves to be deep -sixed,and quick. Please deny this permit. Future generations will thank you.
Suzanne	Elger	578	772	Alternatives	there must be water conservation efforts. The area for this project is largely a desert climate and development must reflect the sensitive nature of this land and make accommodations to this land
NANCY	LOMBARDO	579	773	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to express strong opposition to the Lake Powell Pipeline proposal drawing water from Lake Power to Kane and Washington counties in Utah

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Michele	Murray-Hedlund	581	559	Renewable Energy	This water will not flow through the turbines at Glen Canyon Dam so there is a loss of clean energy in a time of carbon driven climate change and a big impact on our rural power grid
Michele	Murray-Hedlund	581	563	Water Supply	There are no guarantees that there will be enough water in the Colorado river and its tributaries over the next 10 -50 years so then what happens?
Michele	Murray-Hedlund	581	564	Water Law	There are numerous indigenous peoples/tribes that have senior water rights which will be adversely impacted.
Michele	Murray-Hedlund	581	565	Alternatives	The EIS should evaluate all plan alternatives against worst -case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems —including national wildlife refuges and critical habitats —and endangered species. The analysis should be based on the best available science and climate models.
Georgie	Corkery	582	567	Water Resources	I am staunchly opposed to the he permitting and construction of Lake Powell Pipeline, an overly expensive and unnecessary project that would deliver 69,000 acre -feet of water from Lake Powell, piping it across 139 miles to Washington County. The \$1.7 billion project would pull water from an already over -allocated Colorado River which is in current drought conditions.
Georgie	Corkery	582	568	Climate Change and GHGs	We are facing a climate crisis, and one thing that will undoubtedly accelerate global warming and apocalyptic weather events we are seeing around the world, such as the fires in Australia, is lowering the water level of an invaluable ecosystem such as Great Salt Lake.
Tom	Hicks	583	1653	General	VFI is a true direct lending source. We provide quick in -house approvals with industry -leading response time.

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Jenny	Wolff	584	571	Opinion - Opposed to Proposed Lake Powell Pipeline	It would be irresponsible for Utah to divert a huge amount of water to one of the least water - efficient regions in the nation, while water shortage continues to strain the river and other states take measures to reduce their dependency on the fickle resource.
George	Latta, M. D., MBA	585	572	Water Supply	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Jimi	Kestin	614	575	Opinion - For Proposed Lake Powell Pipeline	As along time resident of Washington County Utah, I know there is no more important and vital resource for the preservation of our lifestyle and community than reliable and adequate supply of water to meet the needs of one of the fastest growing Counties in our Nation. Right now this area is entirely dependent on a single source of water to meet all our current and future needs. Virtually every other inhabited area of our size anywhere has more than one source of water to meet their needs, which protects the community from disaster should one source fail to supply the need. Therefore, I firmly believe the Lake Powell Pipeline project is the critically needed second source of the water needed to insure our future for us and the additional water we will desperately need to keep up with the record level of growth in this area and allow our children to have the needed supply to protect their future.
Lisa	Buchanan	615	576	Water Supply	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. ? Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste.
Lisa	Buchanan	615	577	Other	Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.

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Lisa	Buchanan	615	578	Water Resources	The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Lisa	Buchanan	615	580	Water Resources	St George and the surrounding areas are officially in the Lower Basin. They already obtain their water from the Virgin River - one that flows into Lake Mead. Now they want to take some "Upper Basin" water from Lake Powell. Which is it - are they in the Upper or Lower basin of the Colorado River?
Lisa	Buchanan	615	581	Mitigation	I have not seen what conservation measures the two counties have committed to - but conservation should be an integral part of water resource planning as the Colorado River is more and more depleted.
Lisa	Buchanan	615	583	Water Resources	If we keep withdrawing from the Colorado in the Upper Basin - Lake Powell is in the Upper Basin - how effective will the new pipeline be when there is a compact call by the lower basin. How effective will their pipeline be when the water level in Lake Powell drops below the turbine level and sufficient flows cannot be passed through Glen Canyon Dam outlet structures to satisfy the Compact requirements for the Lower Basin states?
Lisa	Buchanan	615	584	Climate Change and GHGs	There is already a definitive increase in temperatures due to climate change in the uppermost areas of the Colorado River basin that supply the bulk of the Colorado River flows. A risk study needs to be conducted to assess the risk of further reducing Lake Powell levels with the new pipeline that addresses the risk of climate change and increased evaporation not only in the headwater regions but also in Lake Powell itself
Lisa	Buchanan	615	585	Water Supply	It is foolhardy to assume that the Colorado River can keep on giving more and more water when it is showing definitive signs that it is over appropriated and will continue to have reduced flows over time.

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Dave	Pacheco	616	590	Water Resources	I've been going to Lake Powell since I was a child, in the early 1970s, when the reservoir was still filling up. Yes, it's a mecca for motorized recreation. More so, it's a natural system of river flow that, if allowed to run its course, would be much more efficient for the water needs of the entire desert southwest. It's my belief that the river was over -allocated in the 1920s, and population growth and demand have rendered the old agreements useless and way overdue for updating to meet the needs of 21st century water use realities. It's my firm belief that the proposed pipeline is a developer -backed waste of good money and time on everyone's part. The science doesn't support building such a straw. The environment certainly can't handle continuation of extremely irresponsible high water use, and we Utahns can simply do better. We know how to buckle up and do what's best for the greater good of everyone. A better solution for Colorado River water policy is to conserve as much as possible on the front end, and not build taxpayer wasting projects like this pipeline that will only fail of its own weight later on. The people in Washington County, just like my parents have done, can live better with less water use. Lets implement sensible water use reduction first, and only after that proves to work, mothball this pipe dream once and for all.
Scott	Plummer	617	592	Water Supply	1. Do Washington and Kane Counties in Southwestern Utah need the water: The city of Albuquerque with a population twice the size of the area proposed by the pipe line supports its population on little more than Washington and Kane Counties's available water not including water which will be converted from agricultural uses to culinary water as agricultural land is sold for development. 2. How much more water can be conserved by better management of our water resources including charging more for water used, higher rates in high use periods like July and August and more. Currently Washington County residents pay less and use more water than other desirable communities in the arid Southwestern United States. 3. Will the water be there when we need it if the LPP is built. Since the original agreement on division of water to the Lower and Upper basin, the Upper basin;s allocation has been cut by nearly 20 % in recent years. The lower basin has a guaranteed amount of water, whereas the Upper basin get a percentage of the remainder, in Utah's case 23%. And even so, there are Water Rights superior to the rights claimed by the LPP. Some have maintained that

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					Utah may be already using its allotment of water, and who in fact has first rights to the water we are claiming
Scott	Plummer	617	593	Other	4. How much will the LPP cost to construct, and how much will it cost on an annual basis to maintain. Studies by the major State universities in Utah have indicated significantly more than estimates which have continued to increase with data on future maintenance woefully inadequate. 5. How much will finance charges to the State and Washington/Kane counties be, asserted by some to be by far the largest cost of the proposed project. Why not wait as long as possible to determine if there is a future need for the pipeline without incurring the costs for premature construction and finance.
Scott	Plummer	617	594	Socioeconomics	6. And what about the need for future growth and development? At the present time the greatest need in Washington County is for low -cost housing to support the population of service workers who receive low wage and pay high rents. Proposals for paying for the pipeline include higher impact fees and higher property taxes, cost which make the construction of low cost housing even less attractive propositions for future development, and even now it is practically non existent.
J.	Jensen	618	600	Water Resources	1. The Lake Powell Pipeline is an unsustainable, wasteful and unnecessary project that relies on a water resource that is already pushed to the limit, and set to diminish even further as the region experiences increasing heat, drought and aridification from global climate warming. 2. Washington and Kane counties are already some of the largest per capita water users in the country, and the proposed pipeline would merely enable and incentivize more wasteful, profligate, and careless water consumption while discouraging and disincentivizing the dramatic water conservation that will be required for long -term sustainability of the region
J.	Jensen	618	601	Other	3. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region, effectively forcing residents to subsidize the project irrespective of whether or not they support it. In other words, it is undemocratic.

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jamiejvavra@aol.com		619	602	Water Supply	Has a minimum water level for Lake Powell been established for the proposed pipeline to provide drinking water to Utah from Lake Powell?
Jill	Doherty	620	607	Water Supply	As far as I'm aware, the documentations from the state level in review of the proposal have cited a lack of conservation alternatives which by all estimations, have not been acted upon by the Southern Utah local water districts. I see very little being done in the way of conservation efforts and methods such as limiting water use during certain times of day and reusing water. We must determine our long term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. We also must take seriously the data that indicates the Colorado River simply does not have the water supply needed to provide for the proposed project. There is a great deal of development happening in St George (particularly on the Eastern side of the city) with large 1 acre homes going up – all with yards and green grass. That grass must be watered. As far as I know, developers and homebuyers are not being given restrictions on the use of grass in landscaping, no penalties for over planting of water demanding plants and shrubs and no oversight on water usage. All these are severe misuses of water. Before ANY discussion on bringing more water to the area, there should be proven example of steps taken to conserve the current water.
Jill	Doherty	620	611	NEPA Process	I believe there also needs to be an update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.

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Richard	Spotts	621	618	Wildlife	As you will note, the DTC has concerns about potential adverse effects by the LPP on the ESA listed threatened Mojave desert tortoises and their habitats. They request that all potential direct, indirect, and cumulative effects on these tortoises by the LPP be fully analyzed in the DEIS, and that alternatives likewise be analyzed that would
Richard	Spotts	621	620	Wildlife	greatly reduce or eliminate those effects. The DTC is a well -respected organization that is largely comprised of tortoise experts, including those who conduct contemporary research on various threats to tortoises and how those threats should be addressed. As such, I believe that the DTC LPP scoping comments and enclosures should provide valuable information in the preparation of the tortoise -related LPP DEIS analysis.
Richard	Spotts	621	621	Cumulative Impacts	In addition, I believe that potential effects from the proposed Northern Corridor (NC) highway in the HCP Red Cliffs Desert Reserve and statutory BLM Red Cliffs National Conservation Area should be evaluated in the LPP DEIS in connection with cumulative impacts on tortoises in Washington County and within the FWS Upper Virgin River Recovery Unit (UVRU). As you know, there are a number of interdependent proposed actions connected with the forthcoming NC DEIS, including HCP renewal and possible amendments to two BLM plans. If the LPP is ultimately approved and constructed, it may provide a stronger rationale or incentive to further boost the explosive human population growth and development that is already occurring in Washington County. These potential "growth inducing" LPP effects could affect many resources, land uses, and wildlife species in Washington County, including the tortoises. As such, I believe that it is important that your agencies and BOR closely coordinate these somewhat overlapping NC and LPP DEISs to ensure consistent analysis for, among many things, the tortoises in the county and UVRU.
Steven	Brown Utah Real Estate	622	1654	Opinion - Opposed to Proposed Lake Powell Pipeline	To whom it may concern, I am opposed the proposed route of the transmission lines throughout the Dixie Springs neighborhood. Unfortunate we just bought a home on 3400 W, passing on other homes that had existing power lines on the lot or on the street.

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Ariana	Lowe	623	625	Other	How do you propose that this pipeline will be paid for if the water dries up? Is the state of Utah willing to help a bankrupt Washington County? Or are the Feds prepared to lend a financial hand?
Ariana	Lowe	623	626	Aquatic Invasive Species	Do you have a plan in place to prevent the invasive mussels from entering the Sand Hollow Reservoir? You don't want them! And that is more money to think about. Paying to keep the muscles out.
Ariana	Lowe	623	627	Opinion - Opposed to Proposed Lake Powell Pipeline	Are you willing to sacrifice endangered species, National Wildlife Refuges, critical habitats and tribal rights to water, for a city that doesn't NEED to grow more? Please do not do this. The war for water is already on the horizon. This will just fuel that fire and make it blaze higher.
Douglas	Johnstone	624	1655	General	I have tried to email you comments about the Lake Powell Pipeline, but the email address you provide appears to be false and now messages can be sent.
Alice	Aeschbacher	625	628	Opinion - Opposed to Proposed Lake Powell Pipeline	I am voicing my strong opposition to the Lake Powell pipeline through Washington county. This pipeline would have devastating impacts on habitat that is already threatened by the inevitable inland port.
Paul		626	629	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline will make St.George another Phoenix. Population density and urban sprawl will destroy the beauty of this area. It will bring air pollution, light pollution, traffic congestion and will reduce the quality of life we now enjoy. Global warming will continue to reduce snowmelt and rainfall that fill the lake - it will become non - sustainable after millions have been spent on building the pipeline for a trickle of water. PLEASE do not build the pipeline.
Richard	Kanner	627	630	Water Resources	1. The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. The river is already over allocated. 2. Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. What we need is better water conservation which thus far these two counties have failed to do.

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Richard	Kanner	627	631	Other	3. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.
Richard	Kanner	627	632	Water Supply	4. The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Richard	Kanner	627	633	Opinion - Opposed to Proposed Lake Powell Pipeline	5. In essence this pipeline is a boondoggle that benefits a few developers and is unsustainable as flows in the Colorado River continue to decline.
Sandy		628	634	Opinion - Opposed to Proposed Lake Powell Pipeline	I think the pipeline is unnecessary and may prove useless in the future. Washington County is foolish and wasteful in our water use. There are many steps we can take to better use the water we have. We need to learn to live within our means, water wise as well as financially. Lake Powell is drying up. There is good reason to think that the resource will not be able to keep up with current demand in the near future. Please do not spend my money(or any more of it anyway) on this project.
Steve & Kim	& Kim Holmes	629	635	Opinion - Opposed to Proposed Lake Powell Pipeline	Please record our opposition to the Lake Powell Pipeline. We see that the Colorado River is already over -allocated, and Lake Powell's low level makes piping water unfeasible and a bad idea.
Marcie	McCleary	630	636	Opinion - Opposed to Proposed Lake Powell Pipeline	There are so many reasons not to build this pipeline, but I think the biggest one is the damage it would cause to the already -stressed Colorado River and to Lake Powell itself. Instead of encouraging rampant, uncontrolled development in Washington County, the state, county, and city governments should work together to develop more thoughtful and detailed zoning ordinances and work with the resources we have.

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Craig	Provost	631	637	Environmental Justice	Economic studies show that the project will only work with huge increases in fees, water rates, and property tax increases. Removing the water costs from property taxes and placing them in tiered water rates will place the burden of excessive water use on this who waste water on lawns in a desert and remove the burden from lower income families that cannot afford increased fees and taxes.
Ali	White	632	638	Opinion - Opposed to Proposed Lake Powell Pipeline	I oppose the building of the Lake Powell Pipeline. I am a St George resident and recreate on Lake Powell occasionally. I believe water conservation measures should be emphasized rather than spending money on the pipeline.
john	gargulak	633	639	Water Resources	First,it does not seem prudent to rely on one source of water, i.e. the Virgin River.Groundwater sources do not seem close to being adequate, especially in the context of continued population growth. In the circumstances, the LPP is the onlyavailable alternative. Conservation is a wise and prudent practice, but it isalready being implemented and will not seem to satisfy the long term needs ofWashington County.
john	gargulak	633	640	Water Law	Lastly,there is the matter of the Colorado River Compact and the unused allocation of Utah's share from the formation of the agreement. It would be impossible toformulate a perfect agreement among the states within the Colorado River basin,but what we have appears to be very reasonable. I seriously doubt that theseveral states could come close to an agreement at this time. Utah has a right to the unused share and the proposed pipeline is probably the highest and bestuse of the unallocated water.
floor@xmission.com	xmission.com	634	642	Water Supply	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.
floor@xmission.com	xmission.com	634	643	Water Resources	Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste.

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First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
floor@xmission.com	xmission.com	634	644	Other	Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.
floor@xmission.com	xmission.com	634	645	Water Supply	The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Matt	Struthers	635	649	Visual Resources	Additionally, the pipeline itself would leave an ugly scar on almost 150 miles of beautiful Southern Utah and Northern Arizona landscape that wouldn't recover for hundreds of years. There are unforeseen consequences of building such a project in any ecosystem.
Sandy	Katz	636	651	Alternatives	Add a water conservation alternative to the EIS studies. <ul style="list-style-type: none"> • Evaluate the costs and yields of major conservation methods. • Determine the high probability long term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. • Determine a reasonable and exemplary water use rate in comparison to other water wise communities in other states.
Sandy	Katz	636	652	Water Resources	Determine the probability that the LPP's water right is highly secure for a permanent water project.
Sandy	Katz	636	653	Water Supply	Determine the high -probability long -term Colorado River flow for the LPP under a range of future climate conditions.
Sandy	Katz	636	654	Other	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.

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Sandy	Katz	636	655	Water Law	Provide the missing data on water rights that verify that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Sandy	Katz	636	656	Biological Resources	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Sandy	Katz	636	657	Climate Change and GHGs	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately.
Natalie	Boles	637	658	Opinion - Opposed to Proposed Lake Powell Pipeline	I STRONGLY OPPOSE the proposed placement of the Power Lines to be installed along the 3400 West Dixie Springs Neighborhood. I live directly on this street and feel that this project will take away from the reasons I purchased my home. It will take away from the beautiful natural landscaping in this neighborhood and will detract buyers and our home value if we decide to sell our home in the future. I also have 5 children living at home and feel that an overhead power line so close to my home is a danger to my children playing outside.
Natalie	Boles	637	659	Alternatives	I understand that there has been proposed, 3 different and very reasonable alternatives to the proposed placement of these specific power lines. Two of the reasonable alternatives were presented during public comments in mapped out routes presented to the Water District and the Utah Board of Water Resources to consider. Both of these routes would involve running the lines approximately two miles longer

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					to reach the targeted power stations just north of Dixie Springs. Both routes would keep the power lines out of the Dixie Springs Neighborhood and would not run through any existing neighborhoods. I also understand that there are Power Lines already in place in the alternative routes that would actually save cost on funding for this project. I also understand that the alternative routes will save cost on trying to install the power lines and poles on hillsides of the existing proposed plan. A third reasonable alternative is to bury these power lines under the street on 3400 West and continue with the proposed route in place. The distance to bury these lines would be less than a mile which makes this option reasonable as well.
Conner	Gray Covington	638	660	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to voice my opposition to the proposed Lake Powell Pipeline project. Water conservation in the southwestern U.S. is a major issue, and the Colorado River is already under severe strain. We should be finding ways to conserve water and not enabling excessive water consumption from the population.
Wesley	Novack	639	661	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm opposed to the Lake Powell Pipeline. ? The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. ? Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. ? Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. ? The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Bruce	Davis	640	662	Water Supply	1. There is no guarantee that future lake levels will be sufficient to provide projected water deliveries over the lifetime of the pipeline. Other users have first rights, current usage exceeds replenishment and replenishment can be expected to drop below the current level due to extended drought conditions.
Bruce	Davis	640	665	Visual Resources	4. The completed pipeline will result in scars on the landscape that will remain for centuries. Renowned vistas will be impacted. Cultural sites dating back hundreds of years will be affected. During construction wildlife will suffer, perhaps permanently.

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Denise	Keenan	641	666	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing as a concerned Utah citizen and US citizen. The proposed project makes zero sense at this point in our western US drought. Community PLANNING is the very best use of the resources that exist and can be adequately utilized well into the future. This must occur in various states and regions of our country. I urge you to CANCEL the Lake Powell Pipeline Project. There is simply not enough water available in the Colorado River Basin.
Helene	Jorgensen	642	667	Other	I attended the Lake Powell Pipeline scoping meeting i Kanab UT last night (1/7/2019), and I would like some additional information in order to prepare my scoping comments: 1) The USBR's Development Plan. 2) Economic cost analysis for the revised, updated plan (without the hydroelectric peaking station). 3) The Water Exchange Contract with the state of Utah.
Jennifer	Marteniez	643	668	Water Law	As stated in the Federal Register notice requesting public scoping comments for the LPP Project, the LPP would deliver water from Lake Powell to Sand Hollow Reservoir for use in Washington and Kane Counties in Utah. Because the water would come from the State of Utah's portion of the Colorado River water apportioned to the Upper Basin in the Colorado River Compact of 1922 (Compact), use of the water is subject to the terms of the Compact.
Jennifer	Marteniez	643	669	Water Law	It is ADWR's position that the "exclusive beneficial consumptive use" language in Article III(a) of the Compact restricts the uses of the water apportioned to the Upper Basin in the Compact to locations in the Upper Basin and restricts the uses of the water apportioned to the Lower Basin in the Compact to locations in the Lower Basin. Accordingly, ADWR believes that water from the State of Utah's allocation of Colorado River water may not be transported through the proposed LPP for use in the areas in southern Utah located in the Lower Basin, including St. George, without specific authorization by Congress. ADWR previously expressed this position to the Secretary of
Jennifer	Marteniez	643	670	General	the Federal Energy Regulatory Commission by letter dated July 2, 2008 and to the Director of the Utah Division of Water Resources by letter dated July 18, 2017.

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Jennifer	Marteniez	643	671	Water Law	ADWR believes that the EIS for the LPP Project should address the legal availability of the water supply for this project in light of the "exclusive beneficial consumptive use" language in Article III(a) of the Compact. The EIS should recognize the need for specific Congressional authorization for the use of water from the LPP in areas of Utah within the Lower Basin.
Jennifer	Marteniez	643	672	General	Thank you for providing an opportunity to submit scoping comments for the draft EIS for the LPP Project. If you have any questions, please feel free to contact me. I would request that you add Vineetha Kartha, Manager of ADWR's Colorado River Management Section, to the mailing list for the LPP Project. The following is her contact information: Vineetha Kartha, Manager Colorado River Management Section Arizona Department of Water Resources P .0. Box 36020 Phoenix, AZ 85006-6020 Email: vkartha@azwater.gov Phone: 602-771-8552
Ingrid	Akerblom	644	673	Alternatives	Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods. Western Resource Advocates’ “Local Waters Alternative,” is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analyse s of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and
Ingrid	Akerblom	644	674	General	and economic standpoint using common sense measures. It is a better solution than the LPP’s water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty.
Ingrid	Akerblom	644	675	Other	Evaluate the costs and yields of major conservation methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water -wise landscaping, incentives to convert existing properties to water -wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc.

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Ingrid	Akerblom	644	676	Water Resources	Include updated information: the recommendations in the state audit of the state's projections of water needs, the more recent lowered population projections, the recent Department Water Resource study of higher conservation potential, and consider all water supplies in Kane and Washington County
Ingrid	Akerblom	644	677	Water Resources	Determine the high probability of the long -term Colorado River flow for the LPP under a range of future climate conditions. Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources's(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP's water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water.
Ingrid	Akerblom	644	678	Other	Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents. The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS.
Ingrid	Akerblom	644	679	Other	Reclamation should also consider analyzing in the EIS the following: · i. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates. · ii. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned. · iii. Interest rates and accumulated totals over the duration of the loan · iv. The impact of the payment methods on water use, and the impact of that on the water supply requirements · v. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt. · vi. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs.

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Ingrid	Akerblom	644	680	Water Resources	Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long -term.
Ingrid	Akerblom	644	681	Water Resources	Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water rights use all of Utah's recalculated Colorado River allocation that considers the high probability of long -term Colorado River declining flows.
Ingrid	Akerblom	644	682	Water Law	Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LPP. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact.
Ingrid	Akerblom	644	683	Other	It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately
Ingrid	Akerblom	644	684	Biological Resources	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River.
Dan	Hopper	645	842	Opinion - Opposed to Proposed Lake Powell Pipeline	? Add a water conservation alternative to the EIS studies.? Evaluate the costs and yields of major conservation methods.? Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.? Determine a reasonable and exemplary water use rate in comparison to other water -wise communities in other states.? Determine the probability that the LPP's water right is

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					highly secure for a permanent water project.? Determine the high -probability long - term Colorado River flow for the LPP under a range of future climate conditions.? Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.? Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.? A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.? Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Samantha	Weintraub	647	685	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to voice my concerns about the proposed Lake Powell Pipeline. The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption. For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward. Thank you for taking the time to read my comments.
Allison R	Davis	648	839	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.Washington and Kane counties are some of the largest per capita water users in the United States.Economic studies show that the project would require increases on fees, water rates, and property taxes in the region.The strategy for using water in a region with growing risk of drought should be based around

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					conserving water. For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward.
Clint	Rogers	651	686	General	Please add me to the project updates list. Thanks, Clint Rogers
Despina	Cosmos	652	687	Opinion - Opposed to Proposed Lake Powell Pipeline	I am totally against the very expensive water pipeline between Lake Powell and St George. It is unnecessary and a waste of money plus putting the Colorado River in even more of a state of drought. I would suggest that people in Washington County learn to conserve water as they use an unprecedented amount of 325 gallons a day per person compared to Tucson who use 177. Reducing water waste would eliminate the billions of dollars on UNNECESSARY water projects. Utah needs to get rid of it's taxed based water system that encourages waste.
Katherine	Canada	653	688	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to voice my opposition to the pipeline. There is every reason to believe that in the future there will not be enough water in Lake Powell to make the expense worthwhile. The money would be far better spent on a water reclamation facility, improving whatever water collection we already have and becoming more conservative in our water usage. After almost 74 years, I know a boondoggle when I see one and the pipeline has boondoggle written all over it. Please do not pursue this project any further.
Lynn	Brklacich	655	689	Opinion - Opposed to Proposed Lake Powell Pipeline	t is time to stop considering the lpp. It has been going on for years and costing millions of dollars and so far nothing has been done. Furthermore, there won't be enough water in the Colorado River to give to us anyway. Also, we have no shortage of water here anyway and we must use what we have. Please let's use our heads and stop this nonsense before we spend any more than we already have for what will probably never come to be.
Owen	J	657	690	Opinion - Opposed to Proposed Lake Powell Pipeline	We don't need the LPP! It is going to cost a lot of money and I don't want to pay for it. We have enough water now for our current population and more. We don't want to be Las Vegas! Stop the LPP! Owen Johnson
Rene	Gmail	658	691	General	Please add me to the email list. Thank you René Fleming

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Karen	Jensen	659	692	Opinion - Opposed to Proposed Lake Powell Pipeline	Please don't squander this natural resource that we all depend on. Water is life and we all depend on it. Instead of embarking on this expensive pipeline let's become more water wise, explore what we all can fo in our every day lives to conserve this valuable resource for not only us but generations yet to be.
Ken	Secrist	661	693	Opinion - Opposed to Proposed Lake Powell Pipeline	What's the likelihood that there will be enough water in the Colorado River to take care of the lake Powell pipeline? Please consult climate scientists; NOT individuals with an inherent bias.
Sue	deVall	662	694	Opinion - Opposed to Proposed Lake Powell Pipeline	The Colorado River is already over allocated! This plan to take water from Lake Powell and move it to another desert reservoir is wasteful and expensive. Where is the water going to come from as the planet warms and the Southwest dries out?
J. David	Kline	663	695	General	Please include me on any updates on this project.
Ed	Larue	664	696	Request for Extended Comment Period	We note that Reclamation published the Notice of Intent (NOI) on December 6, 2019 with a closing date of January 9, 2020. While Reclamation provide d a few extra days beyond the typical minimum 30 -day comment period, the NOI's comment period overlapped the holidays when most people were visiting family/friends and/or preparing for/celebrating the holidays. For future NOIs, we urge Reclamation to publish a longer comment period for their National Environmental Policy Act (NEPA) document s when the comment period overlaps the holiday season. In doing so, Reclamation will ensure with the interested public an “early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” (40 CFR 1501.7). We are unaware of any project -related urgency to limit the NOI comment period to 35 days.

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Ed	Larue	664	697	Alternatives	After reading the NOI, the Council was unable to find information explaining the need to provide an additional 86,249 acre -feet of water [we presume per year] to the St. George area and the limitation of constructing a 140 -mile long pipeline from Lake Powell. Absent this information, we are left with the impression that Reclamation has artificially narrowed the purpose and need of the proposed action. The Council contends that Reclamation has an obligation to develop and analyze other viable alternatives to constructing the pipeline to deliver water. To support this contention, we note that a federal appellate court has previously ruled that in its EIS a federal agency must evaluate a reasonable range of alternatives to the project including other sites, and must give adequate consideration to the public’s needs and objectives in balancing ecological protection with the purpose of the proposed project, along with adequately addressing the proposed project’s impacts on the desert’s sensitive ecological system (National Parks & Conservation Association v. Bureau of Land Management, Ninth Cir. Dkt Nos. 05 -56814 et seq. (11/10/09). Therefore, the Council requests that Reclamation frame the purpose and need by explaining the need to provide water and develop and analyze other viable alternatives in addition to granting the ROW for the Lake Powell Pipeline, that is “other reasonable courses of actions” (40 CFR 1508.25).
Ed	Larue	664	698	Alternatives	The alternatives analysis should include an economic analysis that provides the total cost of constructing the pipeline versus other alternatives, so the public can see how much the total cost of each alternative is. This would include an analysis of the costs of replacing all public resources that would be lost from granting the ROW for the development of the pipeline including direct, indirect, and cumulative impacts. Please note, this analysis would include replacement or creation costs including the time needed to achieve full replacement, not just acquisition, management, monitoring, and adaptive management costs.
Ed	Larue	664	699	Alternatives	The DEIS should demonstrate the various methods that the communities in the St. George area are implementing to reduce water use. For example, other communities in the western U.S. have been under drought conditions for more than a decade. Rather than import water from another area, they have implemented conservation measures that have reduced water use by more than half. Other communities have

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					decided to limit their growth and improve their quality of life and property values by only using the resources that occur in their immediate area.
Ed	Larue	664	700	Cumulative Impacts	Pursuant to Section 1508.25 of the Council on Environmental Quality’s (CEQ) regulations (40 CFR 1508.25), any environmental impact statement (EIS) must cover the entire scope of a proposed action, considering all connected, cumulative, and similar actions in one document. Pursuant to Section 1506.1(a) of these regulations, an agency action cannot “[l]imit the choice of reasonable alternatives” before reaching a final decision in a published [Record of Decision] (ROD). These regulations ensure agencies will prepare a complete environmental analysis that results in a “hard look” at the environmental consequences of all proposed actions instead of segmenting environmental reviews (Novack 2015). The Council is concerned that the proposed Northern Corridor Highway and proposed Lake Powell Pipeline project are being segmented by their separate analyses. They appear to be connected actions, as St. George wants both for population and economic growth and to deal with future traffic issues . Please explain whether these proposed actions are connected and if not, why.
Ed	Larue	664	701	T&E Species	Identify and show those portions of the two alignment alternatives that occur within the range of the listed population of the Agassiz’s desert tortoise (USFWS 1990).
Ed	Larue	664	792	T&E Species	<ul style="list-style-type: none"> As per the latest guidance from the U.S. Fish and Wildlife Service (USFWS 2018), ensure that protocol -level surveys for the desert tortoise are performed in suitable habitats on western portions of the alternative pipeline s during the most active periods (April -May and/or September/October) so that density estimates of tortoises that may be affected by the two alternatives can be estimated and reported in the DEIS. Prior to performing protocol surveys, the proponent must enlist only biologists who have demonstrated experience in surveying for tortoises. The proponent and qualified biologists must meet with pertinent biologists of the USFWS, BLM, and NPS to determine a realistic action area as defined by 50 Code of Federal Regulations 402.2. Agencies should also advise the proponent of suitable

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					survey methodologies for the alternative pipeline s .• Given the sensitivity of the project, the Council believes that only 100% surveys with appropriate zone of influence studies should be performed. “Probabilistic sampling ” as described in USFWS (2018) should not be performed unless prior approval is obtained from USFWS, BLM, and NPS. • Similarly, if any previous surveys were performed more than a year ago, the surveys should be performed again, unless USFWS expressly agrees new surveys are not needed.
Ed	Larue	664	793	T&E Species	• At a minimum, the DEIS must show, for both alternatives, (1) those portions of the pipelines that are occupied and unoccupied by tortoises; (2) locations of all scats, burrows, carcasses, tortoises, and other diagnostic signs; (3) based on the results, estimate the number of tortoises that would be affected by the two alternatives; and (4) provide estimates of the acres of suitable, occupied, and critical habitats (also acres within designated ACECs and NCL lands) that would be permanently and temporarily impacted by construction, operation, and maintenance.
Ed	Larue	664	795	T&E Species	• The DEIS should include a thorough analysis and discussion of the status and trend of the tortoise in the action area, tortoise conservation area, recovery unit, and range wide. Tied to this analysis should be a discussion of all likely sources of mortality for the tortoise and degradation and loss of habitat from construction, operation , and maintenance of the two pipeline alternatives.
Ed	Larue	664	797	T&E Species	We are concerned that the proposed action will result in growth -inducing impacts in the St. George area that will adversely affect the desert tortoise. Under 40 CFR 1508.8(b), “Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”
Ed	Larue	664	798	T&E Species	We request that the DEIS fully analyze, not describe, the growth -inducing effects of constructing, operating, and maintaining a pipeline that brings additional water to the St. George area with respect to impacts on (1) the survival and recovery of the tortoise at the population, recovery unit , and species level; (2) its habitats ; and (3) its population and habitat connectivity. In addition , we request that the DEIS include

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					safeguards that would prevent these growth - inducing effects from impacting the tortoise and its habitats.
Ed	Larue	664	804	Cumulative Impacts	<ul style="list-style-type: none"> In the cumulative effects analysis of the DEIS, please ensure that the Council on Environmental Quality's (CEQ) "Considering Cumulative Effects under the National Environmental Policy Act" (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, "Determining the cumulative environmental consequences of an action requires delineating the cause -and -effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects." The analysis "must describe the response of the resource to this environmental change." Cumulative impact analysis should "address the sustainability of resources, ecosystems, and human communities." For example, the DEIS should include data on the estimated number of acres of tortoise habitats and the numbers of tortoises that may be lost to growth -inducing impacts in the St. George and other affected regions .
Ed	Larue	664	805	Water Resources	A jurisdictional waters analysis should be performed for all potential impacts to washes, streams, and drainages.
Ed	Larue	664	806	Special Status Species	There are likely to be special status plant species found along the two alternatives as determined by appropriate literature reviews and followed by field surveys, the results of which would be reported in the DEIS. Surveys must be completed at the appropriate time of year by qualified biologists (preferably botanists) using the latest acceptable methodologies .

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Ed	Larue	664	812	Mitigation	<p>Mitigation Measures to Offset All Impacts</p> <p>The DEIS should disclose how the proponent plans to minimize and avoid impacts during construction, operation, and maintenance of the proposed pipeline, which may differ depending on which alternative is selected, so the analyses should reflect both alternatives, with regards to, at a minimum, the following issues:</p> <ul style="list-style-type: none"> • The DEIS should include appropriate mitigation for all direct, indirect, and cumulative effects to the tortoise and its habitats; the mitigation should use the best available science with a commitment to implement the mitigation commensurate to impacts to the tortoise and its habitats. As a minimum the proponent should develop and implement a fully -developed desert tortoise relocation plan; predator management plan; weed management plan; fire management plan; compensation plan for the temporal degradation and loss of tortoise habitat that includes protection of the acquired, improved, and restored habitat in perpetuity for the tortoise from future development and human use; a plan to protect adjacent tortoise habitats that can be accessed as a result of the new pipeline right -of-way road and access roads in those areas where new access is created; and a habitat restoration plan for disturbed areas that are not required for pipeline maintenance. • These mitigation plans should include an implementation schedule that is tied to key actions of the construction, operation, maintenance, and restoration phases of the project so that mitigation occurs concurrently with or in advance of the impacts. The plans should specify success criteria, include a monitoring plan to collect data to determine whether success criteria have been met, and identify actions that would be required if the mitigation measures do not meet the success criteria. Because increased vehicle access may result in subsequent fires, we request that the DEIS include a fire prevention plan in addition to a fire management plan. • In 2016, the Council funded the completion of best management practices for habitat restoration (Abella and Berry 2016), which are attached to this letter for your consideration and implementation. • Explain how the proponent will minimize the direct loss of desert tortoise habitats by using existing disturbance and avoiding sensitive areas, such as designated critical habitat and other sensitive areas (e.g., ACEC, NCLs, etc.).

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Ed	Larue	664	816	Mitigation	<ul style="list-style-type: none"> • Develop a specific program to avoid subsidizing known tortoise predators, including common ravens and coyotes, particularly during construction. If deemed applicable by the agencies, the proponent should contribute to the National Fish and Wildlife Foundation’s Raven Management Fund for regional and cumulative impacts. • Ensure that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a project - specific management plan for common ravens. This template includes sections on construction, operation, maintenance, and restoration with monitoring and adaptive management during each project phase (USFWS 2010). • Compensate for lost habitats through either habitat acquisition, mitigation fees, or other existing programs acceptable to the regulatory agencies. Compensation may be variable depending on the sensitivity of habitats impacted, which should also be documented in the DEIS . • Define protocols for displacing tortoises and monitoring them until qualified biologists judge they are out of harm’s way. We assume that tortoises would be relocated into adjacent suitable habitats rather than translocated en masse to some distant location, and that the methods will be disclosed in the DEIS. • We request that the DEIS address the effects of the proposed action on global warming , as the proposed action is growth -inducing from a development perspective, and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the pipeline alignments that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human -caused fires); and how the proposed action may affect the likelihood of human -caused fires. We strongly urge the proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport and spread of nonnative seeds and other plant propagules to/within the project area and eliminate/reduce the likelihood of human -caused fires. The plan should integrate vegetation management with fire management and fire response.

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					Given the above concerns, the DEIS should include a weed abatement program, monitoring plan, and identify remedial activities to ensure the project does not result in the proliferation of non -native plant species, particularly in sensitive habitats identified herein.
Ed	Larue	664	818	T&E Species	<ul style="list-style-type: none"> We are concerned that the placement of this pipeline may fragment regional connectivity between tortoises occurring in adjacent areas. The placement of either alignment may fragment travel corridors and may substantially reduce or destroy their functions in the future as wildlife corridors. We strongly request that the environmental consequences section of the DEIS include a thorough analysis of this indirect effect (40 Code of Federal Regulations 1502.16) and appropriate mitigation to maintain the function of population connectivity for the Agassiz's desert tortoise and other wildlife species be identified .
Ed	Larue	664	823	T&E Species	<p>We are concerned that new access through currently natural habitats may result with development of the pipeline, and that the extent of the impact would vary depending on how much of either pipeline coincides with existing developed corridors. As such, we request that the DEIS include information on the locations, sizes, and arrangements of new and improved roads for both alternatives, who will have access to them, whether the project area will be secured to prevent human access or vandalism, and if so, what methods would be used. The presence of roads even with low vehicle use has several adverse effects on the desert tortoise and its habitats. Besides the direct adverse effect of vehicle impacts resulting in injury or mortality, the indirect effects include the deterioration/loss of wildlife habitat, hydrology, geomorphology, and air quality; increased competition and predation (including by humans); disruption of tortoise movements and fragmentation of habitats; and the loss of naturalness or pristine qualities, all of which should be analyzed in the DEIS. Road establishment is often followed by various indirect effects such as increased human access causing disturbance of species' behavior, increase predation, spread of invasive species, and vandalism and/or collection. All indirect effects to the tortoise should be analyzed in the DEIS. The analysis of the effects from road establishment and use should include cumulative effects to the tortoise with respect</p>

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					to nearby tortoise ACECs, areas designated/needed for connectivity between ACECs, for the recovery unit, and range wide. The DEIS should analyze the five major categories of primary road effects to the tortoise and special status species: (1) wildlife mortality from collisions with vehicles; (2) hindrance/barrier to animal movements thereby reducing access to resources and mates; (3) degradation of habitat quality [needed for adequate nutrition for successful reproduction and recruitment]; (4) habitat loss caused by disturbance effects in the wider environment and from the physical occupation of land by the road; and (5) subdividing animal populations into smaller and more vulnerable fractions (Jaeger et al. 2005a, 2005b, Roedenbeck et al. 2007). In addition, we request that a sixth category of increased predation resulting from increased numbers of predators subsidized by “roadkill” from road construction, use, and maintenance.
Ed	Larue	664	830	T&E Species	For your use, we have enclosed a road impacts bibliography to facilitate the analysis that we expect to appear in the DEIS.
Ed	Larue	664	831	T&E Species	Issues and Perspectives Enhancing and Restoring Habitat for the Desert Tortoise <i>Gopherus agassizii</i> Scott R. Abella,* Kristin H. Berry S.R. Abella University of Nevada Las Vegas, School of Life Sciences, Las Vegas, Nevada 89154-4004; and Natural Resource Conservation LLC, 1400 Colorado Street, Boulder City, Nevada 89005 K.H. Berry U.S. Geological Survey, Western Ecological Research Center, 21803 Cactus Avenue, Suite F, Riverside, California 92518 Abstract Habitat has changed unfavorably during the past 150 y for the desert tortoise <i>Gopherus agassizii</i> , a federally threatened species with declining populations in the Mojave Desert and western Sonoran Desert. To support recovery efforts, we synthesized published information on relationships of desert tortoises with three habitat features (cover sites, forage, and soil) and candidate management practices for improving these features for tortoises. In addition to their role in soil health and facilitating recruitment of annual forage plants, shrubs are used by desert tortoises for cover and as sites for burrows. Outplanting greenhouse-grown seedlings, protected from

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					herbivory, has successfully restored (.50% survival) a variety of shrubs on disturbed desert soils. Additionally, salvaging and reapplying topsoil using effective techniques is among the more ecologically beneficial ways to initiate plant recovery after severe disturbance. Through differences in biochemical composition and digestibility, some plant species provide betterquality forage than others. Desert tortoises selectively forage on particular annual and herbaceous perennial species (e.g., legumes), and forage selection shifts during the year as different plants grow or mature. Nonnative grasses provide low-quality forage and contribute fuel to spreading wildfires, which damage or kill shrubs that tortoises use for cover. Maintaining a diverse “menu” of native annual forbs and decreasing nonnative grasses are priorities for restoring most desert tortoise habitats. Reducing herbivory by nonnative animals, carefully timing herbicide applications, and strategically augmenting annual forage plants via seeding show promise for improving tortoise forage quality. Roads, another disturbance, negatively affect habitat in numerous ways (e.g., compacting soil, altering hydrology). Techniques such as recontouring road berms to reestablish drainage patterns, vertical mulching (“planting” dead plant material), and creating barriers to prevent trespasses can assist natural recovery on decommissioned backcountry roads. Most habitat enhancement efforts to date have focused on only one factor at a time (e.g., providing fencing) and have not included proactive restoration activities (e.g., planting native species on disturbed soils). A research and management priority in recovering desert tortoise habitats is implementing an integrated set of restorative habitat enhancements (e.g., reducing nonnative plants, improving forage quality, augmenting native perennial plants, and ameliorating altered hydrology) and monitoring short- and long-term indicators of habitat condition and the responses of desert tortoises to habitat restoration.
Stacey		665	702	Opinion - Opposed to Proposed Lake Powell Pipeline	I am strongly opposed to the Lake Powell Pipeline. Your time and energy is best spent developing programs that support water conservation, rather than wasted on something like a pipeline that would negatively impact an already over -used resource.

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David	Belnap	666	703	Opinion - Opposed to Proposed Lake Powell Pipeline	As a Utah and U.S. taxpayer, I oppose funds going to pay for the expensive Lake Powell Pipeline. The declining Colorado River flows do not give confidence that this is a long - term solution. As a person who lives in Utah and tries to conserve water, I oppose the LPP. Conservation methods must be more diligently applied in Washington County. The great expense of the LPP should not be done to give Washington County residents lifestyles that the land cannot support.
Mary	Ann Garner	667	704	Opinion - Opposed to Proposed Lake Powell Pipeline	Anyone who studies climate can see that conditions in the southern part of Utah are going to become hotter and drier. The leaders of Washington County are promoting population growth without a coherent plan or strategy for a different future. Washington County citizens waste water. They are the LARGEST per capita water users in the country. That is crazy! There should be penalties for water use and incentives for conservation. There should be programs encouraging reduced consumption like promoting xeriscaping. We have several family members with homes in St. George. They and we are astounded at the lack of forward thinking. The Colorado River is already over allocated. We are obligated to send water downstream to other states and Mexico. By diverting water from an already taxed resource and possibly violating our obligations, we will open the state to expensive litigation. The project is costly. As the winter snow pack diminishes with climate change and water levels drop, it is probably unsustainable. It seems like a boondoggle that will cost residents a lot of money.
Matt	Vukin	668	705	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to express opposition to construction of a pipeline from Lake Powell to serve communities in southwest Utah. These communities are already using water in inefficient ways and use of water from L. Powell is only a temporary fix until more people move in - eventually depleting viable use of this water source (which is already overextended). This shortsighted approach should be replaced with one that emphasizes water conservation and efficient landscaping/use/technology which will not be an obsolete fix in a matter of years or decades. A plan to use water from L. Powell passes the hard decisions to future generations. Please respect upcoming generations by making sustainable long sighted decisions now

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Lindsey	Svete	669	706	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to urge you to cancel the Lake Powell Pipeline Project. Water management must evolve past a "built it and water will come" mentality. The basin is already overdrafted for human use, not to mention the ecosystem considerations in the uncertain future with climate change. We MUST use conservation and reuse as our principal water sources of the future, just like the other basin States have done. For our children and grandchildren, we need to use smart and sustainable population growth practices instead of these antiquated models and that rely on strained water supply sources.
Jim	Herrick	670	707	Opinion - Opposed to Proposed Lake Powell Pipeline	I believe that the water resource suppling the Colorado river basin is finite and already over allocated. The completion of the pipeline project will only exasperate the problem, cause environmental harm and waste a huge amount of public money.
Julie	Mendenhall	671	1656	General	Sent from my iPhone
Craig	Booth	672	708	Opinion - Opposed to Proposed Lake Powell Pipeline	I am totally AGAINST the Lake Powell pipeline and I will tell you why. St. George is an arid city and not once in my lifetime (and I have been here 65 years) has there been a water conservation program set up for the city. We moved to Phoenix for three years about 17 years ago and in that arid place, you could only water every other day and for so long. That city is beautiful with lots of trees and water conserving plants and they do fine. I realize they have a different water conservancy program than St. George but I think St. George could save a lot of water by having a plan like Phoenix. We keep building homes and letting them put in whatever they want. We need a xeriscaping law that no grass is allowed in new builds. We need a water plan for even and odd days. We need to conserve our resources before we go trying a pipeline that is going to cause millions and millions of dollars. How about putting a moratorium on how many people we let into this community? I read where there is a development south of town that has not only thousands of homes but a man -made lake! That is almost funny if it wasn't so ridiculous. Please do not allow us to have to pay for a multi -million dollar pipeline that eventually may dry up and not be worth anything. We can conserve. We can do it! Let us try.

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William	Bagley	673	709	Opinion - Opposed to Proposed Lake Powell Pipeline	I want to register my deep objections to the proposed St. George Pipeline. First, because with proper conservation, Second, it is likely to be obsolete before it can possible be completed. Finally it will bankrupt southern Utah. Rushing this is project more than stupid--it's criminal.
Jim	Templeton	674	710	Alternatives	My name is Jim Templeton. In November of 2018 I purchased a new home at 2863 S. 3400 W. In Hurricane, Utah. At the time of purchase it was not disclosed by either the builder or the Realtor that a power line was planned directly in my front yard, scarcely 20 feet front the front of my home! Had this fact been disclosed, I would not have purchased this property and would have bought elsewhere. I understand there are two other options available which will route this power line outside of the Dixie Springs subdivision. Either of these routes would not have the proposed power lines running through any existing residential neighborhoods. Not only does a power line running through an existing neighborhood aesthetically unpleasant to view, it also presents a possible health hazard along with drastic impacts on market value. The decreased market values not only impacts individual home owners, but will also prematurely impact the City of Hurricane, Washington County and the state of Utah by reducing the tax base. I urge you and others involved in this important decision making process to consider an alternative plan which represents a win/win position for everyone.
Kelly	McAdams	675	711	Other	We purchased a newly built house in August and moved into it in September 2018. A few weeks later after we moved in a neighbor mentioned the possibility that 69KW power lines may be built on our street and directly in front of our new home. I was shocked to say the least that this is even being considered in an existing neighborhood especially one that has underground utilities. For my wife and I this is an unacceptable health hazard and we will be forced to move. There was no public notifications or signage notifying buyers such as myself that these power lines were being considered and would effect our health and significantly devalue our neighborhood. Had I known this I would have never bought this house nor would most of the others unfortunate people that are buying the new houses that are being built and purchased along and in close proximity to these obnoxious disease causing structures. To this day there are still no signs notifying buyers and neighbors of what

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					you are considering. In my opinion allowing these lots to be built and sold without at least putting up easily visible signage along this road is completely irresponsible of the utility agencies and the City of Hurricane. You should be aware that if these power lines are installed here I will seek compensation for loss of value, commissions, moving expenses, legal fees, etc. etc . I will also open this legal action to my neighbors that will also be negatively affected by your project. I would expect this to realistically be in excess of \$200,000 per home This suit will not only list your agency but also the city of Hurricane and others that were responsible for keeping buyers such as myself unaware of this situation. Getting involved in a lengthy legal action is not something I look forward to so I sincerely hope you choose to either route these lines underground or along the other routes through undeveloped land that others have suggested.
Mary	Moran	676	845	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing this comment letter in response to the Bureau of Reclamation's Notice of Intent to prepare a draft EIS for the Lake Powell Pipeline Project. The proposed project should be stopped in its tracks. There is no extra water in the Colorado River. The river's waters have been litigated, mitigated, and mediated, but still there are more diversions from the river than the river can support. Climate change is only exacerbating the problem, as the available water shrinks, yet there is no accounting for climate change in the project projections for water availability. As you know, the Bureau of Reclamation, known for promoting water development for many decades, has recognized the overallocation of Colorado River water in recent years, and has been refocusing their efforts. St George, Utah has a per capita water use greater than twice the national average. Such overconsumption should be curtailed, not supplemented with more water. Conservation education and incentives would solve the water problems. If the project is built, water rates will go up significantly in order to try to pay for the project's expensive water. This will undoubtedly result in water conservation by budget-minded users, so less project funding will be available. Why not conserve first, and just avoid the expense of the project entirely? This project is fiscally irresponsible. As a Utah taxpayer, I do not want to fund this project. Furthermore, there is no realistic legal plan for funding it. The financial implications are that you can't sell water when the supply is dubious and will only get less available

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					through time. Please don't spend any more time, energy or money on this unnecessary and financially irresponsible proposed project. Thank you for considering my comments.
Hannah	Satein	677	850	Opinion - Opposed to Proposed Lake Powell Pipeline	In light of the ethos of NEPA, I do not believe this project achieves the policy goals of the law -to promote a sustainable relationship between humans and the environment. The Colorado River is already over -allocated and undersupplied in many years. Options for dealing with water scarcity in Utah should focus on water use reduction and efficiency measures. For instance, Utah would be well -served by a conserved water statute akin to Oregon's that incentives farmers to make water efficiency upgrades. Washington and Kane counties in particular have significant potential to reduce the per capita water use.
Heath (Lee)	Hansen	678	853	Other	Please add me to your email list.
Evan	Johnson	680	857	Opinion - For Proposed Lake Powell Pipeline	We support the Lake Powell Pipeline provided the benefited land bears all the burden. Folks up north should not subsidized water for developers in the south.
Douglas	Johnstone	681	456	Opinion - Opposed to Proposed Lake Powell Pipeline	The Lake Powell Pipeline is a terrible idea, an idea based on nostalgia for an earlier age, an age of fewer people, less demand on the Colorado River watershed, and a more benign climate.
Douglas	Johnstone	681	457	Climate Change and GHGs	The River is now stressed to its limit, and our warming, drying climate will steadily reduce its future capacity.
Douglas	Johnstone	681	458	Water Supply	Meanwhile, water usage in Southern Utah is at an all-time high, while water conservation gets too little attention.
Douglas	Johnstone	681	459	Cumulative Impacts	The cost of this Pipeline folly is exorbitant and, like all the other consequences of global warming, it will, if constructed, just add to the burden that we of this generation will pass on to our children and grandchildren.

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Mark		682	460	Water Supply	We can't keep taking and taking more water from the Colorado River that is already running so low! I think we need to conserve the water we already have.
Carolyn	Dailey	683	461	Opinion - Opposed to Proposed Lake Powell Pipeline	How can 140 miles of proposed pipeline possibly be laid without disrupting and most likely destroying all flora, fauna and precious cultural and geological resources in its wake? The environmental impact of such an immense project is immeasurable and incomprehensible! This pipe line is a pipe dream of someone sitting at a desk in a city, probably at SITLA in SLC, who has no knowledge of or concern for our unique desert canyon country that gives Utah its world wide fame and international visitors from all over the globe. The Utah environment even in the remotest areas must be protected and preserved
Carolyn	Dailey	683	462	Opinion - Opposed to Proposed Lake Powell Pipeline	for us and future generations.
Carolyn	Dailey	683	463	Water Supply	Also, there is no guarantee with the severe droughts already facing the west that there will even be any water left in Lake Powell to feed this pipeline in future years. Water is like gold in the west... or perhaps more precious since it is the source of life for us all! To rob the water from the Colorado River drainage - already stressed to the max - to feed the greed of developers in St. George is not only incredulous, but almost sinful. Even today this water is needed downriver where Lake Meade is already seriously low... not to mention how low it can become if droughts continue and get worse as they surely will. How can the The Bureau of Reclamation, whose directive is to protect and manage our water supply, in good conscience divert water for more development when there is not enough water to support the development already in place in this drainage area? This is madness...
Carolyn	Dailey	683	464	Socioeconomics	And who will pay for this? Not the developers. Not SITLA. It will be the Utah taxpayers paying the infrastructure so that large scale development can occur on SITLA owned arid land, land meant to be left as a desert, where there is not sufficient water - so bring it in from 140 miles away? This also is madness...this is truly insane. This is not a project to benefit the people. It is a project to benefit SITLA

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					who already is ruining other parts of Southeastern Utah, indeed, trying to ruin our own Spanish Valley and Sand Flats Recreation Area here in Moab. This is particularly hypocritical because it is done in the name of the public schools, when in fact SITLA money only pays into a discretionary fund for special school programs - it does not even account for 2% of most school budgets. If the public schools had to run on SITLA money, they would all close!
Carolyn	Dailey	683	465	Cultural Resources	Worse yet, this pipeline will rob water so that it is doubtful obligations can be met to the water rights of the Navajo native people. These are Senior Water Rights that will be threatened. This is outright social injustice to the Navajo Nation and they should all be up in arms!
Carolyn	Dailey	683	466	Water Supply	Glen Canyon Dam was made for a purpose - why even consider taking water away from it? This water for the pipeline will not serve its intended purpose, because it will never get to the turbines of Glen Canyon to generate hydroelectric power which is a
Carolyn	Dailey	683	467	Water Supply	clean, renewable energy source which should be augmented, not depleted, in this age of climate change. And this water will never get downstream to serve the people and ecosystems already in existence who depend on it.
Carolyn	Dailey	683	468	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not permit the construction of this pipeline!
Larry	Edwards	684	469	Opinion - Opposed to Proposed Lake Powell Pipeline	I wish to go on record opposing the proposed St. George Pipeline.

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Larry	Edwards	684	470	Visual Resources	It is sheer folly and an outrage that a pipeline of 140 miles across the desert is even being considered. It will not only cause irreparable damage to the fragile desert environment during its construction, it will forever be a nasty mark across the landscape.
Larry	Edwards	684	471	Water Supply	The most absurd part is that it is not even certain that there will be enough water in the future to even send down the pipeline once it is built.
Larry	Edwards	684	472	Water Supply	This pipeline will essentially be taking water that already has designated uses for producing hydroelectric power and servicing needs downstream, transporting it a huge distance, only to create further demands on the water supply by allowing construction of further development in a desert area that cannot support development on its own. Lake Meade is already significantly low - and you want to take more water away from it?
Larry	Edwards	684	473	Cumulative Impacts	This does not help the general public. In fact, it is the taxpayers who will ultimately have to pay for the cost - not those who will benefit from the land sale and development. It is no secret that SITLA is behind all this to develop their sprawling land holding. Development of this scale has to be stopped in the west, not promoted, to protect our water supply for existing beneficial uses and not creating more demand. With global warming, it is impossible to predict how much water will be available in the future and years of drought could continue.
Larry	Edwards	684	474	Cultural Resources	I am also worried that the water needs will not be able to be met for people of the Navajo Nation who own land in this area and have senior water rights. This would be an outright social injustice for people who have long suffered.
Larry	Edwards	684	476	Opinion - Opposed to Proposed Lake Powell Pipeline	I ask you to not allow the building of this pipeline which will be a detriment, not a benefit, to the west!
Transcript	Kanab, Utah January 7	685	477	NEPA Process	So first of all, I brought five DVDs full of records, starting in 1964, for the Dixie project, which was the first water project for Washington County, and it ends with this scoping announcement. And I want these documents to be part of

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					the official administrative record because this has a 60-year history, and I would like that 60 years to be analyzed in the scoping process.
Transcript	Kanab, Utah January 7	685	478	Water Law	And so some of the things we want to talk about is, No. 1, it's important that the law of the river be respected here because this is an upper basin water right going to a lower basin county. The Washington county is in the lower basin, not in the upper basin, so we want to Bureau of Reclamation to explain how they can do that legally.
Transcript	Kanab, Utah January 7	685	479	Cultural Resources	And we would also like to make sure the tribes, the Northern Ute's, the Uintah Ouray nation, they don't have their water. It seems unfair to us that this -- you know, there's not enough water in the Colorado River, and this just makes their legal entitlement to water harder to get. So that needs to be explained by the Bureau of Reclamation.
Transcript	Kanab, Utah January 7	685	480	Water Supply	There are some contradictions here, especially for the drought contingency planning agreement. That agreement talks about water from Flaming Gorge going downstream to increase the levels of Lake Powell. And so from Flaming Gorge -- this water right is from Flaming Gorge. This one purpose of the Lake Powell Pipeline
Transcript	Kanab, Utah January 7	685	481	Water Supply	contradicts the purpose of drought contingency planning. It puts more risk in the system, and we would like the Bureau of Reclamation to justify how they are going to manage both.
Transcript	Kanab, Utah January 7	685	482	Biological Resources	We're concerned about quagga mussels infesting the Virgin River system. We are concerned about -- we think that will make the pipeline cost more, and we would like them to explain those costs, additional costs, and how they can be sure they quagga mussels won't infest the reservoir in Washington County or the Virgin River.
Transcript	Kanab, Utah January 7	685	483	Water Supply	And let's see, what else? The Basin Study makes it very clear that there is going to be over a 3 million acre foot deficit, and so we want to -- how are you going to take care of that deficit if you are increasing the diversion from the Colorado River? You're actually increasing the gap between supply and demand, and we would like to know how you are going to balance that.

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Transcript	Kanab, Utah January 7	685	484	Alternatives	There should be an alternative in the EIS for
Transcript	Kanab, Utah January 7	685	485	Alternatives	water conservation in Washington County as opposed to diverting more water from the Colorado River. In other words, use what you have, lower your -- the citizens' consumptive use and stretch your water supply through conservation. That should be an alternative.
Transcript	Kanab, Utah January 7	685	486	Water Supply	The Colorado River simulation system, the modeling program, I would like to see traces that would show a worse case scenario and a best case scenario and something in between so that we have an idea of what the future might be according to the official natural flow from 1906 to 2017. I would imagine that's close to 2017. And so, specifically, I would like to see TraCE-21 in the modeling program. I would like to see a printout of that, not only for Lake Powell but also for operations in Lake Mead, to show what levels would be like under TraCE-21 conditions, starting in -- you know, have the trace start in 2020 and take it through for the -- that would be 110 years into the future, so we can see what Lake Powell and Lake Mead -- what their levels will be like in the future, with and without the Lake Powell Pipeline.
Transcript	Kanab, Utah January 7	685	487	Opinion - For Proposed Lake Powell Pipeline	St. George is one of our nation's fastest growing and driest cities. We need water as a result of that. We support the Lake Powell Pipeline and consider it essential for our future. Our population is currently 100 percent dependent on a single variable water source that is nearly fully developed.
Transcript	Kanab, Utah January 7	685	488	Water Supply	The Colorado River is a much more reliable water supply for our growing population and our economy. The State of Utah has existing water rights in the Colorado River, and this project allows us to develop those rights and benefit from the economic prosperity that will result from the available water supply.
Transcript	Kanab, Utah January 7	685	489	Socioeconomics	The Lake Powell Pipeline will provide jobs and allow businesses to continue opening, growing and diversifying our economy.

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Transcript	Kanab, Utah January 7	685	490	Alternatives	Additional conservation is an essential part of the plan. However, we have heard others state that we can solve our future water needs by simply conserving or transferring agricultural water to municipal use. This approach produces less water of a lower quality for comparable price and doesn't add a drop of water to our county or diversify our water resources. Additionally, it has greater environmental impacts. It just doesn't make sense.
Transcript	Kanab, Utah January 7	685	491	Opinion - For Proposed Lake Powell Pipeline	We appreciate that the Utah Division of Water Resources has conceived a project that will introduce a more reliable water supply to our community, at a reasonable cost with minimal environmental impact, and request that the Bureau of Reclamation expedite the project to ensure that we continue to stay ahead of water demand. Our population and our economy depend on it, literally.
Transcript	Kanab, Utah January 7	685	492	Water Supply	The first and most basic issue: Is enough water available to fill the 69-inch pipeline from Lake Powell? Determine the high probability of the long-term water supply feeding the pipeline. That is a very complicated issue and it must be studied honestly. From what I've read, Lake Powell is storing less water the past ten years since the lake holds less water each year. One must be very careful when assessing the amount of water available for use in this arid climate where the climate is changing dramatically.
Transcript	Kanab, Utah January 7	685	493	Alternatives	Add a water conservancy element to the EIS statement. Also evaluate the costs and yields of major water conservancy methods.
Transcript	Kanab, Utah January 7	685	494	Socioeconomics	What impact will this water pipe have upon the citizens of Southwest Utah? How much will each household have to pay to cover the costs of the pipeline? As a resident of Kanab, I fear that Kane County's water rates will increase dramatically. Is this necessary? Can the average water user afford the cost? A thorough study of the financial impacts on families in the region needs to be done.
Transcript	Kanab, Utah January 7	685	495	Alternatives	Less expensive alternatives to the pipeline need to be considered.

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Transcript	Kanab, Utah January 7	685	496	Water Law	I have a concern about adjudicated water rights in the state. How do we know that there is enough water rights to fill the pipeline, and yet leave enough
Transcript	Kanab, Utah January 7	685	497	Water Law	in the Colorado River Basin or the other areas, such as the Uinta Basin? The Indian tribes yet have unadjudicated water rights themselves at issue. How would that be mitigated for the pipeline? And would individual water wells, domestic water wells of local property owners, how would they be affected? Would we be able to still maintain our water right to those wells, or would they have to be incorporated to fill the adjudication water rights if the state would allow the project to proceed?
Transcript	Kanab, Utah January 7	685	498	Water Resources	It concerns the Kane County spur providing water from the Lake Powell Pipeline to the connection point with the Johnson Canyon water system now provided for residents in the nearby areas of Kanab City. The Johnson Canyon wells that are naturally filtered through the Navajo sandstone and provide a high quality domestic culinary water source. What will keep the Lake Powell water from mixing with that and degrading that water source for domestic use?
Transcript	Kanab, Utah January 7	685	499	Lands and Realty	My immediate comment is to be sure that Bureau of Reclamation realizes that there's lawsuits filed for the Grand Staircase/Escalante National
Transcript	Kanab, Utah January 7	685	500	Lands and Realty	Monuments, and I'm certain they are aware of it but we don't know when the judge is going to call for a court date. It will probably be in 2020, and if it is, then there's time that the Bureau of Reclamation is going to be able to make adjustments. But should a judge rule that the President didn't have the authority to shrink the monument, diminish the size of it, then that means that the pipeline will be going across the Grand Staircase/Escalante National Monument, and so that needs to be in the back of somebody's head because it will take an adjustment in the EA, I would assume. So anyway, that's the comment.

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Transcript	Kanab, Utah January 7	685	501	Water Law	Will it affect ourpreexisting water rights, if we have some?· And the otherthing is, Utah allows water capture of up to 2,500gallons, rain and water or rain and snow water capture.Will that affect anything -- any ability to -- well,that's the state of Utah allowance, and so I'm justwondering if that would affect that.
Transcript	Kanab, Utah January 7	685	502	NEPA Process	So I intend to submit additional comments.This would not be the total of my comments, my scopingcomments, but at this time, I do want to formally protestthe period that has been allotted for public scopingcomments.· It seems to me to be very short in time, fromthe month of December until the present date, with onlyone or two days available to the public to preparewritten comments following these public meetings thathave been scheduled.
Transcript	Kanab, Utah January 7	685	503	Request for Extended Comment Period	I believe that is far too short a time toreceive meaningful scoping input from the public, and Iwould like to ask for the Bureau of Reclamation to revisit the period of time that has been allotted forscoping and extend that period of time, reopen it, andextend it longer, in order to receive meaningful commentsfrom the public in this phase of the process.
Transcript	South Jordan, Utah January 9	686	504	Water Law	There's two topics I would like to commenton.· The first is the development of Colorado River waterbeing state interest.· Utah has an important allocationof Colorado River water.· Parts of that have been placedto beneficial use in Central and Northern Utah.· Thoseare very important to the public.· · · · · But we're in a situation now, and in the pastmany years, that the unused portion of Utah's allocationhas flowed to the lower basin states and is becoming morerelied upon over time.· And so it is a compellinginterest of the state to develop and place a beneficialuse, its allocation of Colorado River water, forproviding for a growing population in Utah.And because of that, I believe that thisproject will make an important additional step towardsbeneficial use of Utah's allocation.
Transcript	South Jordan, Utah January 9	686	505	Water Supply	In my experience, this will be an importantaspect for Washington County and Kane County, to have asecond water supply serving as redundancy and for otherbackup purposes.

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Transcript	South Jordan, Utah January 9	686	506	NEPA Process	And I just wanted to say that the Bureau of Reclamation and the Provo office should be relying on information tested and proven as accurate by parties outside of just the Washington County Water District. It is disappointing that we saw information in the PowerPoint that was factually inaccurate from the Washington County Water Conservancy District that is presented as facts by the bureau when the bureau hasn't done the study to ascertain whether or not it's factual. We are disinterested in seeing the Federal Government deceive the public, and that is, effectively, what will happen if information presented by other parties is not fact checked by the Bureau of Reclamation. To see information in the PowerPoint that has not been
Transcript	South Jordan, Utah January 9	686	507	NEPA Process	fact checked, presented as fact, is disturbing.
Earlene	Rex	699	511	Opinion - Opposed to Proposed Lake Powell Pipeline	I feel compelled to voice my opposition to the lake Powell pipeline.
Earlene	Rex	699	512	Socioeconomics	Who will pay for this ? I think that the developers Who will benefit from this water by building more and more houses, apartment buildings etc. they should be the ones to pay for it not the taxpayers.
Earlene	Rex	699	513	Water Supply	The Colorado river is already over extended so will there even be water to pipe to St. George? This river runs dry before it gets to the ocean so just where is this water coming from
Earlene	Rex	699	514	Opinion - Opposed to Proposed Lake Powell Pipeline	Plus the environmental impact of building this across the fragile Desert will destroy too much. Please look at the real problems this will create and do not build this pipeline.

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Jonathan	Bradshaw	700	515	Alternatives	As a lifelong Utah resident I urge you to carefully consider use of sustainable conservation measures of water use, especially for very dry SE Utah.
Jonathan	Bradshaw	700	516	Alternatives	We need strong conservation measures and steeply changed water use rates, especially for inessential golf courses, compared to essential agricultural use. SE Utah needs to change, but not to developing an insatiable thirst, without strict, different, wise water use.
Louisa	Brannon	717	517	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to convey my lack of support for the pipeline.
Louisa	Brannon	717	518	Cumulative Impacts	I am especially concerned about the decrease in water flow into the ocean and what that would mean for ocean currents and migration , if it would effect that and if research has been done to find out.
Louisa	Brannon	717	519	Opinion - Opposed to Proposed Lake Powell Pipeline	In conclusion, I would ask you to please not spend such a large amount of time and money on this project, unless it is to bring water to people or animals who don't have enough water to live comfortably (not including lawn watering) .
susan	olson	718	520	Opinion - Opposed to Proposed Lake Powell Pipeline	don't do it. its our land, not yours. find another get rich scheme that doesn't take and pollute our lands.
Matt Rice	Michael R. Styler	719	521	NEPA Process	The Notice does not describe the preceeding before FERC in any detail, and it is not clear the extent to which Reclamation intends to incorporate and rely upon the administrative record compiled by FERC between 2008 and 2019 in preparing its own EIS for the LPP Project as revised.
Matt Rice	Michael R. Styler	719	522	Opinion - Opposed to	American Rivers is concerned that the LPP Project as proposed would undermine these efforts--which are supported by all seven (7) basin states, including Utah--by

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				Proposed Lake Powell Pipeline	erasing potential water savings gains delivered to Lake Powell and discouraging support for, and participation in, basin-wide solutions to reduce water demand.
Matt Rice	Michael R. Styler	719	523	NEPA Process	American Rivers requests that Reclamation add the following representatives to the service list for this proceeding: Matt Rice, Colorado River Basin Director, AMERICAN RIVERS, 1536 Wynkoop St., Suite 321, Denver, Colorado 80202, (303) 454-3395, mrice@americanrivers.org Richard Roos-Collins and Julie Gantenbein, WATER AND POWER LAW GROUP PC, 2140 Shattuck Ave., Suite 801, Berkeley, CA 94704, (510) 296-5588, rrcollins@waterpowerlaw.com, jgantenbein@waterpowerlaw.com
Matt Rice	Michael R. Styler	719	524	NEPA Process	2140 Shattuck Ave., Suite 801, Berkeley, CA 94704, (510) 296-5588, rrcollins@waterpowerlaw.com, jgantenbein@waterpowerlaw.com
Matt Rice	Michael R. Styler	719	525	NEPA Process	Reclamation Should Clarify the Extent to which It Intends to Rely Upon the Administrative Record Compiled by FERCA's stated in Section I, FERC compiled an administrative record during the 11 years UBWR's license application was pending. The Notice does not state whether or to what extent Reclamation intends to rely on the record compiled by FERC. American Rivers requests that Reclamation clarify the extent to which Reclamation will incorporate information in FERC's administrative record into this administrative record.
Matt Rice	Michael R. Styler	719	533	NEPA Process	With the exception of environmental impacts specific to hydropower generation, the scope of environmental impacts for the currently proposed LPP Project should be similar to that identified by FERC in 2008. American Rivers recommends that the scope of Reclamation's EIS include analysis of the potential environmental impacts of the project and alternatives identified in Scoping Document 2, with the exception of impacts related only to hydropower generation facilities since eliminated from the proposal, and any additional impacts identified since 2008.
Matt Rice	Michael R. Styler	719	542	NEPA Process	The EIS must analyze and disclose the environmental consequences of the LPP Project and alternatives. Consistent with this requirement, Section 4.2 of Scoping Document 2 (pp. 26 - 33) included a list of environmental issues to be addressed in

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					the EIS. In addition to evaluation of the impacts listed in Scoping Document 2 Section 4.2, American Rivers requests evaluation of the impacts listed below.
Matt Rice	Michael R. Styler	719	545	Water Resources	Under Water Resources add the following:
Matt Rice	Michael R. Styler	719	547	Water Resources	- Effects on Lake Powell water levels and instream flows in the Colorado River downstream under climate change forecasts;- Effects on demand reduction programs in Colorado River Basin states.
Matt Rice	Michael R. Styler	719	549	Socioeconomics	Under Socioeconomics Resources add the following:- Effects of current population growth and water demand projections for Washington and Kane Counties on the economic feasibility of the project;- Effects of water availability, including reasonably foreseeable restrictions on Lake Powell diversions (e.g., obligations under relevant Drought Contingency Plans, changes in Colorado River Basin Operating Guidelines), on the economic feasibility of the project.
Matt Rice	Michael R. Styler	719	550	Noise and Vibration	Under Visual Resources and Noise add the following:- Effects of increased noise on wildlife in the proposed project area.
Matt Rice	Michael R. Styler	719	552	Cultural Resources	Under Archaeological and Historic Resources add the following:- Effects of changes to visual resources on traditional cultural properties and cultural landscapes.
Matt Rice	Michael R. Styler	719	560	Climate Change and GHGs	The EIS's discussion of the environmental setting and impacts of the LPP Project and alternatives should consider current and predicted climate change conditions, and other reasonably foreseeable changes to the affected environment. ⁵ Scientific data shows: "[c]limate change can make a resource, ecosystem, human community, or structure more susceptible to many types of impacts and lessen its resilience to other environmental impacts apart from climate change. This increase in vulnerability can exacerbate the effects of the proposed action." ⁶
Matt Rice	Michael R. Styler	719	561	Climate Change and GHGs	American Rivers requests that Reclamation consider the potential impacts of the proposed LPP Project and alternatives in light of the Colorado River Basin's increased

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Matt Rice	Michael R. Styler	719	562	Climate Change and GHGs	vulnerability due to climate change using Stress Test Hydrology in its modeling analyses or other appropriate alternative future hydrology scenarios.
Matt Rice	Michael R. Styler	719	566	Alternatives	Reasonable Range of AlternativesThe EIS must "rigorously explore and objectively evaluate" a reasonable range of alternatives to the proposed action. ¹⁰ Scoping Document 2 provided for the analysis of alternative pipeline routes and other reasonable, alternatives that meet the purpose and need of the proposed project (i.e., increasing and diversifying water supplies for Washington and Kane Counties). ¹¹ Consistent with the direction established by FERC, the range of alternatives considered by Reclamation should include non-pipeline alternatives, including the Local Waters Alternative and others listed in Scoping Document 2. ¹² It should also consider reasonable alternatives that are beyond Reclamation's authority to implement. ¹³ For example, FERC recommended further study of an alternative that would coordinate Nevada's and Utah's water development proposals even though such an alternative would be beyond FERC's jurisdiction to require. ¹⁴ The EIS should also "include the population growth-related effects of the proposed pipeline and alternatives where such effects can be reasonably foreseen." Scoping Document 2, p. 9.
Matt Rice	Michael R. Styler	719	569	Socioeconomics	Request for Additional StudyAmerican Rivers requests that Reclamation undertake, or direct UBWR to undertake, a study of the economic feasibility of the proposed LPP Project under a range of demand and water availability scenarios. Such analysis is important to the consideration of the environmental consequences of the LPP Project as compared to alternatives. ¹⁵
Matt Rice	Michael R. Styler	719	570	Socioeconomics	We request that Reclamation undertake, or direct UBWR, to undertake further study regarding the economic feasibility of the LPP Project as currently proposed and under a range of supply reduction scenarios. The results of such study are necessary to Reclamation's and Cooperating Agencies' evaluation and disclosure of the socioeconomic impacts of the project and alternatives in the EIS.
	Various People	720	579	Alternatives	Living Rivers and other concerned organizations submit the following scoping comment which identify the range of significant potential impacts associated with the

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					LPP Project, and urge you to fully evaluate them, and alternatives to the project that would avoid those impacts, in the context of your NEPA review.
	Various People	720	582	NEPA Process	Additionally, we urge Reclamation to put completion of this EIS on hold until crucial agreements and other governmental actions are completed that will significantly clarify the amount of water available for the Lake Powell Pipeline and Green River Block Water Rights Exchange Contract. These critical agreements and actions include the Ute Water Compact and the re-consultation of the 2007 Interim Guidelines, as well as preparation of a Programmatic EIS done on the newly signed Upper Basin Drought Contingency Plan.
	Various People	720	586	Opinion - Opposed to Proposed Lake Powell Pipeline	In developing this EIS, we encourage Reclamation to take the long view.
	Various People	720	587	Opinion - Opposed to Proposed Lake Powell Pipeline	Adding the LPP Project to this already strained system is unneeded and cannot be sustained from either an environmental or an economic perspective.
	Various People	720	588	Opinion - Opposed to Proposed Lake Powell Pipeline	If you do prepare a comprehensive and forward looking EIS, consistent with our comments below, we are confident that you will conclude that the Project is not in the public's best interest, and that the Lake Powell Pipeline should not be approved.
	Various People	720	589	NEPA Process	The Lake Powell Pipeline Coalition (LPP Coalition), Conserve Southwestern Utah, the Waterkeeper Alliance, WildEarth Guardians, Living Rivers and Colorado Riverkeeper have a long history of involvement in the public review process surrounding the permitting of the Lake Powell Pipeline and our timely correspondence with FERC, Reclamation, and Cooperating
	Various People	720	591	NEPA Process	Agencies are outlined in the following table and attached as Appendix A for inclusion in the administrative record of the Project. ²

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	Various People	720	595	NEPA Process	Reclamation should put this EIS on holdWe urge Reclamation to put completion of this EIS on hold until crucial agreements and other governmental actions are completed that will significantly clarify the amount of water available for the Lake Powell Pipeline and Green River Block Water Rights Exchange Contract.14. These critical agreements and actions include the Ute Water Compact and the re-consultation of the 2007 Interim Guidelines, as well as preparation of a Programmatic EIS done on the newly signed Upper Basin Drought Contingency Plan (Section 3.G, Section 3.C, Section 3.D).The Hydrological Determination completed by Reclamation in 2007 is no longer relevant to the Upper Basin States and must be revised using time dependent, forward-looking data in order to understand Upper Basin water availability (Section 3.A).NEPA requires a programmatic EIS on the Upper Basin Drought Contingency Plan (DCP), specifically the Drought Response Operations of Upper Basin Reservoirs, before this EIS can be completed (Section 3.C).Re-consultation of 2007 Interim Guidelines will begin by 2021 and will very likely affect the 50-year feasibility of the LPP Project (Section 3.D).
	Various People	720	596	NEPA Process	The EIS should be put on hold until it can be determined that Utah has the rights to sufficient water in tributaries to be the subject of an exchange, and that those rights are tied to actual wet water (Section 3.F).This EIS must be put on hold until the pre-compact Federal Reserved Water Rights claims of the Tribes in Utah are settled (Section 3.G).
	Various People	720	597	Climate Change and GHGs	Climate change and the continued aridification of the Colorado River Basin must be analyzed in the EIS as it relates to current and future water supply (Section 3.A, Section 3.B).
	Various People	720	598	Water Supply	The EIS must not rely solely on the Record of Decision on Flaming Gorge Dam Operations in 2006 to assess water availability for the LPP Project (Section 3.A).
	Various People	720	599	Cumulative Impacts	The cumulative effects of all proposed and yet undeveloped Upper Basin depletions, including the LPP Project, need to be modeled and evaluated in this EIS (Section 3.B).

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	Various People	720	603	Water Law	The State of Utah has vastly over-appropriated water rights to the Colorado River, putting water users in jeopardy (Section 3.E). Because the consumptive use of water for the Lake Powell Pipeline will put current water users with junior rights in jeopardy of losing their water rights, given ongoing aridification, the EIS must analyze the economic and cultural impact that a Compact Call or a curtailment, made necessary as a result of the water depletion effects of the LPP Project would have on other water users in Utah's Colorado River Basin (Section 3.E).
	Various People	720	604	Water Supply	The EIS should require an in-depth look at tributary flows into the Green River to determine how they may be impacted by climate change and over-appropriation (Section 3.F).
	Various People	720	605	Water Law	Reclamation must clarify whether releases from Flaming Gorge Dam, in the Upper Basin Division, and conveyed to Washington County, Utah, which is in the Lower Basin, is an appropriate use under the 1922 Colorado River Compact and associated Law of the River (Section 3.H).
	Various People	720	606	Alternatives	The EIS should fully explore alternatives to the Lake Powell Pipeline Project, including conservation and alternative sources of water in the region that could obviate the need for the Project (Section 3.I).
	Various People	720	608	Socioeconomics	The Project budget must outline the costs and/or impact of treating Colorado River water, or diluting Colorado River water with local groundwater, and upgrading municipal plumbing systems to deal with introducing chemically unique Colorado River water into the public utility lines in Washington County (Section 3.J).
	Various People	720	609	Aquatic Invasive Species	The mitigation of aquatic quagga mussels that have infested Lake Powell must be assessed for the entire conveyance system, and return flows to Lake Mead via the Virgin River, including the economic impacts of this problem (Section 3.K).
	Various People	720	610	Cultural Resources	The EIS must fully evaluate the two alternative pipeline routes, in consultation with the Kaibab Paiute Tribe, to identify a route that would not impact sacred sites, burials and other cultural values (Section 3.L).

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	Various People	720	612	Recreation	Further industrialization from pipeline infrastructure along the route will diminish the recreational value of the scenic area (Section 3.M).
	Various People	720	614	Water Supply	The EIS must analyze the impact that use of Project water would have on hydropower production at Glen Canyon Dam (Section 3.O).
	Various People	720	615	Water Resources	The EIS should examine the effects of changes to downstream water quality as reservoir levels at Lake Powell approach the top of the inactive pool and result in the remobilization of stored sediment deposits in the upper reaches of Lake Powell (Section 3.P).
	Various People	720	616	Biological Resources	The EIS must address impacts of the LPP Project and associated water withdrawal on Colorado River health and endangered species. This would include the ecosystem of the Virgin River (Section 3.P).
	Various People	720	617	Socioeconomics	The State of Utah needs to clarify how much interest will be required for the financing of loans for the LPP Project before we can understand the financial feasibility of the Project and if it is in the public's best interest (Section 3.Q).Reclamation should require UBWR to develop a more accurate and complete project budget and submit it to the public for review (Section 3.Q).
	Various People	720	619	Climate Change and GHGs	Specific recommendations for including climate change in the scope of the EIS:The EIS must use modeling that takes climate change into account. Models that are based on the last 100-years of records are not adequate for this. Models should instead be based off relevant peer-reviewed science about current and future climate impacts in the Colorado River Basin and include the "stress test" hydrology described in Section 3.B.23The EIS must not rely solely on the Record of Decision on Flaming Gorge Dam Operations in 2006 to assess water availability for the LPP Project. Similar modeling used to develop the 2007 Interim Guidelines has completely failed to predict the current
	Various People	720	622	Climate Change and GHGs	risk for shortages we face in Lakes Mead and Powell, leading to the need to develop emergency DCPs in both basins that will likely impact dam operations basin-wide.The Hydrological Determination completed by Reclamation in 2007 is no longer

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					relevant to the Upper Basin States and must be revised using forward-looking data in order to understand the impact that the Project will have on basin-wide water availability. ²⁴
	Various People	720	623	Cumulative Impacts	Specific recommendations for the scope of this EIS related to the evaluation of the cumulative effects of potential basin wide water depletion and water scarcity connected with the LPP Project: The EIS must analyze the possibility of a Compact Call with full buildout of proposed Upper Basin water projects and the effect this would have on the communities that will become dependent on the LPP Project, should it be approved. For example, it should analyze the effect on the repayment schedule for the construction of the Project if full water capacity is not available for the Lake Powell Pipeline (more detail in Section 3.Q). The EIS must analyze the impact that a Compact Call would have on other communities and economies in the Upper Basin.
	Various People	720	721	NEPA Process	Additionally, because the Upper Basin DCP will trigger major federal actions in regards to reservoir operations, a basin-wide Programmatic Environmental Impact Statement (PEIS) must be prepared that addresses the requirements and potential impacts of coordinated operations of the Aspinall Unit, the Navajo Dam, and Flaming Gorge Dam. It is essential that this basin-wide PEIS be incorporated in planning for releases from Flaming Gorge Dam because the operations of these dams will be tied together to ensure Compact obligations are met, including compliance with the Clean Water Act and the Endangered Species Act. ³³
	Various People	720	725	NEPA Process	Consequently, the EIS examining the LPP Project, as well as the Environmental Assessment (EA) for the Green River Block Water Rights Exchange, should be tabled as premature, since an accurate assessment of water availability at Flaming Gorge Reservoir, in full compliance with the National Environmental Policy Act, can only follow the development of coordinated dam operation guidelines under an Upper Basin DCP.
	Various People	720	726	NEPA Process	We specifically request that:

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	Various People	720	730	NEPA Process	The Upper Basin DCP and the Lower Basin DCP be the subject of a basin-wide PEIS. The basin-wide PEIS include consultation with an independent science panel that is involved from the very beginning of the process and that the National Academy of Sciences review and approve the PEIS. All of these steps be taken before preparing the EIS for the LPP Project since a complete understanding of the DCP is needed to model likely future scenarios regarding Flaming Gorge Reservoir and Lake Powell.
	Various People	720	733	Water Supply	We agree with Barnett and Pierce: it is time to create, and work with, a firm supply schedule for the natural flow of the Colorado River Basin. This estimation should be based on models that take into account likely decreasing stream flows due to climate change to the year 2100. It is inappropriate to assume that this basin can successfully augment the water supply in the next 80-years (potentially up to the amount of 6.5 MAFY). The cost per acre-feet to balance the
	Various People	720	735	Water Supply	water budget in the 21st century would likely be 2 to 5 times greater (adjusted for inflation) than the total spent in the 20th century. An agreement resulting from the re-consultation of the Interim Guidelines is necessary to safeguard critical habitat for endangered species and the water supply of nearly 40 million people. This negotiation process should be open to stakeholders across the basin, including the public. We request that the re-consultation of the Interim Guidelines allow for full and meaningful public participation. It is important that this agreement on Colorado River operations be completed before permitting the LPP Project and other large depletions in the Upper Basin. We need to understand where we stand with future water supply in order to weigh the cost/benefit ratio of investing billions in new water projects.
	Various People	720	740	Water Law	Because of the substantial over-allocation of both Utah's water rights, and the water rights of the Colorado River Basin as a whole, the junior status of the Lake Powell Pipeline water rights leaves the Project in danger of being impacted by future drought contingency measures and re-consultation of the 2007 Interim Guidelines, which will be finalized in December of 2025. More discussion follows, in Section 3.Q, about the need to evaluate the costs associated with implementing a demand management

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					program, partially because of LPP Project withdrawals, in the Upper Basin. Also because of the over-appropriated nature of water rights in Utah, use of water for the Lake Powell Pipeline will put current water users in jeopardy of losing their more junior water rights with ongoing drought. The EIS should analyze and include the economic and cultural impact that a Compact Call or a curtailment would have on other water users in Utah's Colorado River Basin who have junior water rights to the lake Powell Pipeline, but who have already become reliant on the water.
	Various People	720	748	Water Supply	Nowhere does the exchange contract outline or describe the method of measuring and accounting the "direct flows" left in the river in order to equate those to the releases from Flaming Gorge Dam. We believe the project documents for the Lake Powell Pipeline need to include the details of this exchange.
	Various People	720	749	Socioeconomics	There would be costs associated with monitoring and accounting that also need to be included in the economic analysis.
	Various People	720	752	Water Supply	We request that Reclamation and the UBWR provide more information on the mechanism of accounting for this water rights exchange. The EIS should require an in-depth look at tributary flows on the Green River in Utah to verify if such an exchange is even possible along side the settling of the Ute Water Compact and the Green River Block Exchange Contract of 72,641 AFY. ⁴³ The EIS should incorporate detailed analysis of these tributary flows (Price, Duchesne, Yampa, Muddy, San Rafael, White, Duchesne, Price, San Rafael, Dirty Devil, and Escalante rivers) and how they and the ecosystems they support may be impacted by climate change and this appropriation in the coming years.
	Various People	720	756	Water Supply	Because the State of Utah's approved water rights are over-allocated, as acknowledged by the Utah Division of Water Rights, the State must demonstrate where the water will come from to fulfill the Ute Water Compact before Reclamation finalizes the LPP Project water rights exchange with the State. The EIS must not only include consideration of these factors in its calculation of available water, but should also incorporate these anticipated new uses into modeling.

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	Various People	720	766	Water Law	Consequently, Reclamation, the State of Utah, and the Uintah Ute Tribe need to complete and sign the Ute Water Compact and if necessary, settle an exchange contract for releases from Flaming Gorge Reservoir with the Northern Ute Tribe, which has pre-compact water rights and has been in negotiation with the State of Utah and Reclamation, before engaging with the State of Utah on a contract for releases from Flaming Gorge Reservoir for the LPP Project, which has significantly more junior water rights. In addition, the EIS should require an in-depth look at whether the LPP exchange contract is even possible along side the settling of the Ute Water Compact and the Green River Block Exchange Contract of 72,641 AFY. ⁴⁷
	Various People	720	768	Water Law	Reclamation should address the legal uncertainty that surrounds the use of Colorado River Storage Project water in the Lower Basin of an Upper Division State. We recognize a legal controversy amongst Colorado River users and stakeholders that releases from Flaming Gorge Dam, in the Upper Basin Division, and conveyed by pipeline to Washington County, Utah, in the Lower Basin, may not be an appropriate use under the 1922 Compact. Reclamation's clarification on this matter is necessary.
	Various People	720	776	Purpose and Need	UBWR has not adequately proven the purpose and need for the Lake Powell Pipeline. EIS must fully examine alternative water supplies and conservation. The need for the Lake Powell Pipeline has long been contested. Water conservation and development of local water sources can likely fulfill the water needs of the growing Washington and Kane Counties through 2060, as examined by a citizen's alternative from Western Resource Advocates called, "The Local Waters Alternative to the Lake Powell Pipeline." ⁴⁸ In order to account for conservation, the UBWR application simply examines the impact of eliminating all future outdoor water use, which is a highly unpopular and unconventional water conservation measure, rather than using a robust assessment of proven techniques used by similar desert municipalities to successfully decrease water demand.
	Various People	720	781	Purpose and Need	Furthermore, calculations used by the applicant to predict future water demand scenarios have been examined by a state audit and found to be inaccurate. A High Country News article covering the issue states, "On May 5 [2015], Utah's Legislative Auditor General released a damning report revealing that the water agency's forecasts

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					are based on unreliable data and failed to adequately account for the possible contributions of conservation and irrigation water freed up as new homes consume farmland. "By excluding this added water supply," the auditors write, "the projections accelerate the timeframes for developing costly, large-scale water projects."51In addition, the Kane County Water Conservancy District (KCWCD) has not officially agreed to take the water from the LPP Project. Originally, the LPP Project included 13,000 AFY for Iron County, but this county has since withdrawn its request for water because of high costs. We believe that the KCWCD might do the same after being presented with a true cost estimate and considering that they have very little need for Project water. In the 404 Clean Water Act permit application for the LPP Project, UBWR states, "There would be a projected water shortage of approximately 1,334 AFY in 2060 within the KCWCD service area under the No Action Alternative."52 This is telling because it mentions no water conservation measures, nor does it demonstrate a need for 4,000 AFY of water by Kane County. In fact, without any conservation measures taken, it appears that Kane County would only use one third of its full allocation under this application by 2060.Reclamation should require that the applicant fully explore the impact that conservation, water pricing, and zoning measures could have on the need for the Lake Powell Pipeline. It should also fully explore the safe yield use of the Navajo Sandstone aquifer and other regional options as alternative sources of water in the region, after conservation. The applicant should be required to re-work the models used to predict future demand to fully incorporate a price driven, demand use scenario, as well as to accurately account for the conversion of irrigation waters to culinary use, as is done in the Local Waters Alternative. The burden is on the Applicant to show that there are no practicable alternatives.
	Various People	720	783	Socioeconomics	As in Tucson, residents of Washington and Kane counties will likely reject the foul tasting Colorado River water given that they have better local alternative sources of water. The project does not outline the cost of treating or injecting Colorado River water or upgrading municipal plumbing systems to deal with the unique chemical nature of that water.Chapter 10 of the Preliminary Licencing Proposal submitted by the UBWR to the Federal Energy Regulatory Commission (FERC) refers to a "a

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					future conventional water treatment facility located near the mouth of Johnson Canyon" in Kane County without ever outlining the cost of this necessary component. The PLP makes no mention of the need for, or the cost of, a water treatment facility at the terminus of the pipeline in Washington County. ⁵⁵ Omitting these two necessary features in the hydro system is a gross oversight in the project budget and plan and should be required to be included in the project description and budget in order to move forward with the Project.
	Various People	720	784	Aquatic Invasive Species	We are very concerned that if the LPP Project is constructed, it will lead to quagga mussel infestation in Sand Hollow Reservoir. The National Park Service states, "It is crucial to keep the mussels from moving from Lake Powell to other lakes and rivers." ⁵⁸ The mussels could spread if any veligers survive transport through the pipeline. The applicant refers to chemical treatment stations as a way to mitigate this, but other entities trying to control mussel infestation in water treatment plants have had to use a multi-pronged effort including mechanical scrubbing and chemical treatments to keep water plants functional. ⁵⁹ We do not believe the chemical treatment of veligers in the boosting stations will be enough to ensure that quagga mussel veligers do not ever enter Sand Hollow Reservoir and establish a colony.
	Various People	720	785	Water Resources	In addition, the chemical treatment of mussels can put toxic byproducts into drinking water,
	Various People	720	786	Water Resources	causing difficulties in water treatment plants. Continuous chemical treatment for invasive quagga mussel veligers could lead to violations of State Water Quality Standards.
	Various People	720	787	Water Resources	The applicant completely fails to address this important water quality issue in its application.
	Various People	720	789	Socioeconomics	The additional cost of managing the invasive quagga mussels needs to be considered in the immediate and long term cost of operations for the LPP Project.

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	Various People	720	790	Socioeconomics	If quagga mussels infested Sand Hollow Reservoir, the state would have to implement a similar program for containing the threat and the cost of this would be significant.
	Various People	720	791	Biological Resources	The possible impacts that quagga mussel infestation could have on the environment that the EIS should examine include: alteration of the food web, promotion of blue-green algae blooms, changes in water quality, and negative effects on fisheries.
	Various People	720	794	Biological Resources	The EIS should look at the impacts that construction and disturbance upstream in the Kanab Creek ACEC riparian area might have on the sediment, water quality, and endangered species in lower Kanab Creek.
	Various People	720	796	Cultural Resources	Reclamation must consult with the Kaibab Paiute Tribe because their aboriginal culture and heritage extends beyond the sovereign boundaries of their reservation. The UBWR has identified two possible pipeline routes. One route follows the highway corridor rather than going
	Various People	720	799	Cultural Resources	through pristine lands. Meaningful consultation with the Tribe is necessary in order to identify a route that would not impair sacred sites, burials and other cultural values. ⁶⁸ The EIS must evaluate both pipeline alternatives in this NEPA process. It should be noted that the applicant's preferred alternative, the South Alternative Alignment, is preferred because according to the applicant, it "avoids effects on the Kaibab-Paiute Indian Reservation." ⁶⁹ This is concerning and perhaps alarming given that in the last round of comments to FERC, the Kaibab-Paiute Indian Tribe specifically requested that "the EIS must fully and objectively analyze and consider the existing highway alternative," ⁷⁰ which would cross the reservation alongside the existing highway. The Tribe's comments are extensive and detail many issues with the South Alternative Alignment, which crosses the BLM administered Kanab Creek Area of Critical Environmental Concern (ACEC). The No Action Alternative may be the only effective to protect tribal cultural resources, and therefore should be fully analyzed.
	Various People	720	800	Recreation	EIS must examine impacts to recreation along the pipeline route. The route of the pipeline, along with transmission lines, pumping and hydroelectric stations would be

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					located in a uniquely beautiful region of rural Utah. Many who visit this region are driving the highway to experience wonders of the natural world: Bryce Canyon National Park, Zion National Park, Canyonlands National Park, Grand Staircase-Escalante National Monument, and points between. Further industrialization of this scenic corridor will diminish the recreational value of the area and will thereby cause related economic harm.
	Various People	720	801	Visual Resources	EIS must examine impacts to aesthetics values near Sand Hollow Reservoir. Numerous residents of the neighborhoods near Sand Hollow Reservoir submitted written comments to FERC detailing complaints about the proposed overhead transmission lines routed through their neighborhoods. These comments cite major concern for changes in quality of life, obstruction of the natural view shed, and concern for diminishing property values because of this impact. It is unclear if these transmission lines are still a part of the proposed Project or not. If so, the EIS should examine these impacts thoroughly, including impacts on property values in the area.
	Various People	720	802	Water Supply	The EIS must analyze the increased risk of Lake Powell levels falling below minimum power pool requirements due to the use of Project water and the effect that would have on regional power supply, as well as the economic and social impact that this will have in the region serviced by power from the Glen Canyon Dam.
	Various People	720	803	Biological Resources	The Colorado River is already a strained ecosystem. This fact is demonstrated by the many threatened and endangered species found along its reach. These species include, Humpback Chub, Razorback Chub, Bonytail Chub, Colorado River Pikeminnow, Southwestern Willow Flycatcher, Yuma Clapper Rail, and the Western Yellow-billed Cuckoo. The impact on Colorado River flows downstream of the diversion for the LPP Project and the associated effects on endangered and threatened species should be examined fully by Reclamation in this EIS. Additionally, the EIS needs to analyze the impacts of decreased flows (due to the Project as well as the cumulative impacts of all proposed projects upstream, and climate change induced flow decline) on river and ecosystem health.

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	Various People	720	810	Cumulative Impacts	The increased, cumulative diversions that would result from approval of the LPP Project would exacerbate salinity problems in the Lower Basin. The EIS should examine this issue fully as it relates to the cost of mitigation, the economic and health impacts on downstream municipal water users and irrigators, and the impact on special aquatic sites and endangered and threatened species.
	Various People	720	813	Biological Resources	The EIS should also examine the impacts of the mobilization of perched reservoir sediment that happens as reservoir levels diminish in Lake Powell and Flaming Gorge Reservoir. Reservoir sediment contains organic material which when mobilized, can deplete oxygen in the water column of the reservoir and negatively impact the critical habitat below the dams.
	Various People	720	815	Water Resources	The mobilized sediment can also liberate toxins and heavy metals into the water column and affect water quality for wildlife and human communities downstream. ⁷⁶
	Various People	720	819	Environmental Justice	A true cost accounting and the associated economic model for repayment are both necessary for understanding the social justice implications of the Project as a whole because the residents of Washington and Kane County, as well as potentially taxpayers across Utah, including minority and low income populations, will be expected to foot the bill.
	Various People	720	821	Socioeconomics	The State of Utah must first make clear the financial obligations of the WCWCD on loan repayments for the Project in order to fully understand the Project's financial feasibility.
	Various People	720	826	Socioeconomics	The economic estimate described in the permitting documents should also examine the hidden costs associated with dealing with water shortages in the Upper Basin if Washington County becomes reliant on Colorado River water. When shortages occur, Washington County will be in the same predicament as the Front Range of Colorado; they will seek agricultural water rights along the Colorado River to buy and convert to municipal water rights for the Project. Given the likelihood of future water shortages in the State of Utah, this hidden cost should be included in the economic models.

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	Various People	720	829	Socioeconomics	The EIS needs to examine the LPP Project as it relates to increased need for a demand management program in the Upper Basin and the associated costs of such a program.
	Various People	720	832	Socioeconomics	Colorado's Southern Delivery System provides a good proxy for comparison to understand the potential economics of construction of the Lake Powell Pipeline. The first phase of the Southern Delivery System was completed by Colorado Springs Utilities in 2016. It consists of 62 miles of buried 66 inch pipe, 4 pump stations, and a 50 million gallons per day water treatment facility. The total cost for this project, including financing was \$1.45 billion. The project was heralded as an example of great fiscal responsibility that brought the project in under budget. ⁸² How then, can the Lake Powell Pipeline with its additional pump station, six inline hydroelectric stations, larger pipe, and more than twice the length, be expected to cost nearly the same amount?
	Various People	720	843	Socioeconomics	As you can see, the given estimated total cost of the Lake Powell Pipeline is far below what it will likely cost in the real world. We roughly estimate an honest cost estimate for the Project to be between \$3-5 billion dollars. Before completing an EIS, Reclamation should require UBWR to develop a more accurate and complete project budget and submit it to the public for review. An accurate budget and economic analysis required from the UBWR and examined in the EIS should include: Analysis of the effect on the repayment schedule for the construction of the Project if full water capacity is not available for the Lake Powell Pipeline, as with a Compact Call (Section 3.B) Cost of monitoring and accounting for "exchange water" (Section 3.F) Cost of water treatment facilities necessary to use the Colorado River for potable water in Washington and Kane County (Section 3.J) Cost of quagga mussel infestation/mitigation (Section 3.K) Cost of additional water treatment required as a result of quagga mussel containment (Section 3.K) Impact to recreation and associated economic impacts along the route (Section 3.M) Impact to revenue generation at Glen Canyon Hydropower Project (Section 3.O) Cost of additional salinity control measures along the Colorado River (Section 3.P) Cost of dealing with decreasing water quality due to diminishing reservoir levels (Section 3.P) Cost of converting agricultural water rights in the Colorado River Basin of Utah to municipal

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					water rights as water shortages take hold (Section 3.Q)Cost of implementing a successful demand management program in the State of Utah (Section 3.Q)Cost of bond financing and capitalized interest over time (Section 3.Q)
	Various People	720	844	Socioeconomics	Based on the economic impacts associated with the direct and indirect costs of the LPP Project detailed above, which the applicant has failed to fully and accurately disclose, we urge Reclamation to require a better accounting of costs be prepared and made public by the UBWR for the LPP Project so that its economic impacts can be fully evaluated in the EIS.
	Various People	720	848	NEPA Process	We urge Reclamation to put completion of this EIS on hold until crucial agreements and other governmental actions are completed that will significantly clarify the amount of water available for the Lake Powell Pipeline and Green River Block Water Rights Exchange Contract. These critical agreements and actions include the Ute Water Compact, the agreements finalized by the re-consultation of Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead that will begin next year, and a Programmatic Environmental Impact Statement on the newly signed Drought Contingency Plan operations.
	Various People	720	851	Socioeconomics	We request that Reclamation require the Utah Board of Water Resources and the State of Utah to provide necessary information on additional, currently unevaluated project costs, and on loan repayments, and to conduct and make available an accurate economic analysis prior to beginning to prepare the EIS.
	Various People	720	852	Water Law	In addition, we require more information on the Exchange Contract between Reclamation and the State of Utah, which must outline an adequate system of accounting for the exchange of water from tributaries for Flaming Gorge water before we can fully understand the environmental and economic implications of such an exchange.
	Various People	720	855	Climate Change and GHGs	Finally, we urge Reclamation to fully consider all of the potential impacts of this extremely questionable project. In particular, it is imperative that modeling for the Project use the most up-to-date and relevant predictions of impacts from climate

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					change on the hydrology of the Colorado River Basin and the allocation of water in the Upper Basin.
	Various People	720	856	Opinion - Opposed to Proposed Lake Powell Pipeline	We hope that Reclamation will prepare an EIS that considers all the facts and the broad range of potentially significant impacts of this unnecessary and costly water project. We are confident that the preparation of a comprehensive EIS will make it clear that the selection of the No Action Alternative is required for the LPP Project.
Alice E.	Walker	721	870	NEPA Process	It is the Kaibab Tribe's position that all materials, comments, reports and correspondence submitted in the FERC docket should automatically be part of the record before the Bureau of Reclamation, however, the Tribe has prepared the enclosed thumb drives in order to ensure that its materials, comments, reports and correspondence are included in the record before the Bureau of Reclamation. We have divided the Kaibab Tribe's materials into two separate drives: public, non-privileged materials; and non-public, privileged materials. The documents, comments, reports, and correspondence contained on the non-public, privileged materials drive should be maintained as confidential, consistent with the requirements of federal law, the Bureau of Reclamation's trust obligations to the Kaibab Tribe, and the government-to-government relationship between the Bureau and the Tribe.
Osman N.	Sanyer	722	875	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to urge you to cancel the Lake Powell Pipeline Project.
Osman N.	Sanyer	722	879	Alternatives	The EIS should evaluate all plan alternatives (including coordinated water conservation efforts) when assessing the damage that will be done to downstream ecosystems, endangered species, municipalities and agriculture if the Lake Powell Pipeline is allowed to proceed.
Osman N.	Sanyer	722	882	Climate Change and GHGs	In addition, the EIS needs to include 50-100 year range climate change projections, and the associated impact on river flow using accurate science and climate models.

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Osman N.	Sanyer	722	887	Opinion - Opposed to Proposed Lake Powell Pipeline	Given the realities of climate change and the steadily decreasing in stream water flow available in the Colorado River, I believe the only prudent action is to cancel the Lake Powell Pipeline project. If an assessment is to proceed, it needs to be done in a scientific, complete, and non-politicized manner.
Rebecca	Mitchell	723	894	Water Law	Legal Framework: The LPPP is a complex undertaking that raises a number of legal issues, involving the Colorado River Compact of 1922 and other elements of the law of the River. ³ While Colorado supports the LPPP, questions remain as to whether, under
Rebecca	Mitchell	723	913	Water Law	the Law of the River, Utah may use a part of its Upper Basin apportionment to serve uses in the Lower Basin portion of Utah without obtaining the consent of the other states. Utah has discussed some of these issues through informal communications or consultations among the Basin States. However, before the NEPA permitting process is completed, formal documentation of how Utah will implement the LPPP consistent with the Law of the River will be essential.
Rebecca	Mitchell	723	917	Water Law	Because any use of Lake Powell supply or capacity directly implicates rights within the Upper Division, it is important that the EIS make clear the source of water and water right for the LPPP. Additionally, Colorado requests that the LPPP clarify how use of said water will be integrated into the Law of the River to avoid injuring the interests of the other Upper Division states.
Rebecca	Mitchell	723	927	Water Law	In addition to this description, the EIS should clarify the connection, if any, of the LPP to flows in the Virgin River drainage, a Lower Basin tributary that flows to Lake Mead. To that end, the EIS should also recognize and assess how such connection, if any, is to be accounted for in a manner consistent with the Law of the River.
Rebecca	Mitchell	723	936	General	Colorado River Descriptions: The CWCB recommends that the EIS descriptions of the Colorado River and its operations remain accurate and consistent. As examples, definition of Upper and Lower Basins, description of releases from Glen Canyon Dam (timing of Secretary determinations, summary of operational tiers), discussion of the Article III(d) non-depletion obligation, identification of the Secretary of the Interior's role as water master, water apportioned under the Upper Basin compact,

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					etc. should be carefully included as needed with an understanding of how those and other elements of Colorado River operations apply throughout the Basin. Additionally, the CWCB recommends that any descriptions of available yield in the Upper Colorado River basin, if included in the EIS, reflect the position of all Upper Basin states and how they operate. Otherwise, the CWCB recommends that these descriptions identify and describe Utah's perspective and not speak on behalf of the other basin states.
Rebecca	Mitchell	723	945	NEPA Process	Reservation of Rights: The CWCB's comments are intended to highlight overarching issues that will require acknowledgement, specification or clarification as the LPPP EIS process continues to progress. The CWCB's failure to provide specific comments regarding details of the LPP shall not be construed as an admission with respect to any factual or legal issue or the waiver or rights for the purposes of any future legal administrative or other proceeding. Furthermore, the CWCB reserves the right to comment further on LPPP documentation as BOR proceeds with subsequent phases of the EIS process.
Larry	Ellertson	724	953	Socioeconomics	In addition to interest being included in the repayment there are other potential impacts that should be considered as follows: Cash flows Lost opportunity costs Impacts on Utah residents/taxpayers as the State of Utah acts as the lender of \$1.3 - \$1.8 billion dollars for 50 years.
Larry	Ellertson	724	954	Water Supply	Any impact this could have on other water needs in the state of Utah.
Martin P	Greenbank	725	959	Water Law	I have 1 1/2 acre feet of water rights - will this pipeline affect my water rights?
Mary F	Poe	726	965	Water Supply	Wise use is imperative in a desert environment!!
Andrea	Kaz	727	974	Electric and Magnetic Fields	As a resident of Dixie Springs subdivision in Hurricane UT I have a major concern about the proposed powerlines that are possible along 3400. This will negatively impact our property values and possibly our health.

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Andrea	Kaz	727	976	Socioeconomics	As a resident of Dixie Springs subdivision in Hurricane UT I have a major concern about the proposed powerlines that are possible along 3400. This will negatively impact our property values and possibly our health.
Andrea	Kaz	727	978	Alternatives	There ARE power lines to the south and west of Sand Hollow reservoir and to the NORTH of Dixie Springs subdivision. I certainly seems that it would make more sense to utilize power poles that ALREADY exist than to destroy an area that has NONE.
Andrea	Kaz	727	982	General	Any construction along 3400 would be negligent, disruptive, arrogant and completely in disregard to the wishes of the residents.
John	Choate	728	989	General	I am interested in background of the water distribution, dams, pipelines, canals when the Glen Canyon dam and Lake Powell were planned. Specifically maps, drawings, estimates, almanacs, topographical maps of rivers, water distribution, canals, bridges, irrigation, dam sites, locks, impoundments, salt pollution. Years - before 1970, between 1920 and 1970.
Brent	Hall	729	997	Opinion - For Proposed Lake Powell Pipeline	The Lake Powell pipeline is critical for future needs by providing a second source of water and additional water. The current dependence of Washington County on the Virgin River basin is limiting and risky, especially as the population grows. We definitely need the Lake Powell Pipeline as soon as it can be developed. I strongly supporting building the pipeline. The water will still be much less expensive than buying water at Walmart. Any environmental issues can be mitigated.
Pam Palermo Terri Draper	Nicole Hancock	730	1002	Opinion - For Proposed Lake Powell Pipeline	On behalf of the St. George Area Chamber of Commerce, we appreciate your willingness to receive input regarding the Lake Powell Pipeline and would like to express our strong support for its construction. The availability of water is critical for our economy and allows businesses to open, grow and thrive now and into the future. In our desert surroundings, there is no more important resource. Our national parks bring many millions of tourists to our region, and while we enjoy welcoming the world and the strength this adds to our economy, they also tax our limited resources. Currently our region is supported by a single source of water and we drastically need a more reliable source. The Lake Powell Pipeline is a steady, cost-

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					effective option that we cannot afford to bypass. The pipeline has been well-researched and thoughtfully planned for more than a decade by local, state and federal leaders. It is clear that it is a reasonable, fiscally viable way to deliver water for the rapidly growing communities in southwestern Utah.
Christina	Gorzalski	731	443	Water Resources	The newest residents have no concept of water conservation and yet we are told that we need a pipeline which will stress our budget... Lake Powell is not reliable. Other states are being asked to decrease their water use.
Scott	Taylor, PE	732	441	Purpose and Need	While the City and County have been able to develop local water throughout the Virgin River Drainage Basin over the past 160 years to meet the needs of a thriving community, data indicates that there is a need for a second source of water, separate from the Virgin River Drainage Basin, in order to sustain the growth of a thriving community. The Lake Powell Pipeline project provides that second source of water. It is apparent from the Colorado River Compact of 1922 that the State of Utah recognized the need for water from the Colorado River to sustain future development and growth. In a way, the Lake Powell Pipeline has been planned for nearly 100 years.
Scott	Taylor, PE	732	442	Alternatives	In reviewing the different alternatives of the LPP project, it appears that there are pros and cons with both the Southern Alternative and the Highway Alternative. I believe that either of these alternatives are acceptable. The third alternative, the No Action Alternative, is very concerning to me for reasons explained above. The LPP is necessary for the development and sustainability of our thriving community and economy. While I understand that the Environmental Impact Statement (EIS) is a document that will describe the positive and negative affects of a proposed action, and focuses on the environmental impact of the project, I believe that it is essential to identify the negative impacts that the No Action alternative would have on a community level. These negative impacts would include impacts to the economy, tourism, degradation of lifestyle, and increased affects of climate change on a localized water supply. I believe that these impacts to the community are far greater than the environmental impacts of varying pipeline alignments.

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		733	1657	General	YOU HAVE UNTIL FRIDAY, JANUARY 10 TO SUBMIT A COMMENT. No need to submit it in the Jan 8th meeting • Suggest topics that should be analyzed in the Environmental Impact Statement • Due Jan 10, send to lpp@usbr.gov Scoping Comment: Personal Statement and Topics that should be analyzed Personal Statement: Name, address, what you think about water conservation and large water development projects, the importance of wise water use, being locally sustainable. Topics that should be analyzed: • A substantive, honest water conservation alternative to the LPP. • Fair and accurate costs and yields of modern conservation methods. • The projected future local water supply. • Reasonable and exemplary water use rate compared to water-wise communities in other states. • The projected future Colorado River flow for the LPP under a range of future climate conditions. • The security of LPP's water right considering senior rights and decreasing river flows. • The specific payment structure for LPP costs, including interest.
Ed	Bowler	734	440	Purpose and Need	This water will give us an economy that can grow for future generations.
John	Choate	735	435	Purpose and Need	water is required for growth
John	Choate	735	436	Socioeconomics	We need work for youth
John	Choate	735	437	Water Resources	Send me water studies from before 1970
John	Choate	735	438	Other	You take too long, decades instead of months. Return land ownership to Utah. Do away with payment in lieu of taxes. Get a right of way wide enough for a thousand years. Pay the Kaibab Paiutes for their land right of way with the savings, keep it short and fast. Repeal the Endangered Species Act. Whip it out before the democrats can stop it.

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John	Choate	735	439	Opinion - For Proposed Lake Powell Pipeline	Water control is for flood control, energy, irrigation, lifestyle, food, argicultural.Build more dams, lots of pipeline, canals.California democrats are destroying agriculture by cutting off water.Repeal the Clean Water Act.Repeal the Environmental Protection Act.God controls climate, repeal all climate rules. Washington County is a desert, we need water to provide jobs.Treat water like oil, gas, minerals, let it meet the price of the market.
Mike	Eagar	736	434	Water Resources	If pipeline is built, future source not sustainable.
Nina	Bowen	737	432	Cultural Resources	My concern is with the alignment between the Colorado City pumping station and the Hurricane cliffs, along Short Creek. That area has many archaeological sites and several rock art panels.
Nina	Bowen	737	433	Alternatives	The alignment should be altered either to the north or south of South Creek. That area is also prone to flooding.
Peter	Gozalski	738	431	Water Resources	[water conservation] should be foremost on a list of things St. George should do befor eeven considering a pipeline... I think money would spent wiser by retrofitting people homes, businesses, schools with plumbing with water saving features.
Rick	Rosenberg	739	430	Purpose and Need We should continue to advocate for the Lake Powell Pipeline Project so the next generation of residents will have the water they need... As Mayor I have been charged to protect the residents of Santa Clara. A safe, relilable and redundant water supply is citically important in maintaining water service to those residents.
Terri	Draper	740	428	Opinion - For Proposed Lake Powell Pipeline	Water is the most critical resource to facilitating the growth of this lovely, desert region and I and my family strongly encourage you to do everything in your power to help make the Lake Powell Pipeline a reality.
Terri	Draper	740	429	Purpose and Need	Our water resources are in short supply and the need for water redundancy and increased capacity is clear if we are to be able to continue to grow with steady strength into the future. I commend the Washington County Water Conservancy District (WCWCD) for the extensive work they have done since 1962 in locating and developing water sources to meet the needs of one of the fastest growing areas in the

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					nation. Conservation is important and our district does a remarkable job leading out with it.
Doneva	Hecker	741	427	Opinion - Opposed to Proposed Lake Powell Pipeline	We as a community will not benefit from this project at all... We feel like the development of Southern Utah should "slow down." ... We should be trying to protect and preserve our current status to maintain our quality of life, our quality of air and water... We don't want it, we don't need it.. and we sure as heck don't want to pay for it.
Lee	Bayter	742	426	Opinion - For Proposed Lake Powell Pipeline	Excellent presentation
Matt	Stephens	743	424	Purpose and Need	The cost of this pipeline is so excessive that it will force an increase in water rates in order to lower the cost of this project. This increase in rates over 300% will reduce the amount of water used in these counties to the point where the water from the pipeline project will be completely unnecessary.
Matt	Stephens	743	425	Water Law	High property taxes and poor water pricing structure have create some of the cheapest water rates in the world... rather than spending billions on a proposed pipeline project... why not change those structure in order to limit the use of water in a more sustainable way... Creating tiered pricing structures that actually make residents consider the financial impacts of their water use will lead to water conservation.
Paul	Zuckerman	744	420	Wildlife	It will negatively impact delicate lands and animals.
Paul	Zuckerman	744	421	Water Resources	The Colorado River is already overly drawn upon and global warming will make it a dwindly source. Utah in general and Washington County are the greatest consumers of water in the 2nd driest state.
Paul	Zuckerman	744	422	Water Law	Utahns do not pay the real cost of water because our tiered pricing structure is flat so that every user pays the same low rate no matter how much water they consume. No conservation incentive!

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Paul	Zuckerman	744	423	Socioeconomics	The cost of the LPP will be so high that all Utahns will be asked to help pay for it for decades for the relatively small desert community in Washington County.
Transcript	St. George, Utah January 8	745	1664	Alternatives	There is an option to go from the Highway 7, around and up Sand Hollow, and connect with the existing power lines that's north of Dixie Springs Subdivision. Those power lines exist already. There is no expectation of no power lines for anyone that lives along that track because there are already power lines. They would be just improving existing power lines.... Follow that route that the power lines exist already that are along Highway 7, Sand Hollow, and then across north of the Dixie Springs Subdivision and just improve those power lines.
Transcript	St. George, Utah January 8	745	1665	Alternatives	So we proposed two alternative routes to run those transmission lines, not through Dixie Springs but around Dixie Springs, where there are currently no existing developments or homes. And both of them look very feasible. A lot of the land already has power line easements on it and poles that are existing. And a lot of the land is owned by Washington County Water Conservancy District.
Transcript	St. George, Utah January 8	745	1666	Alternatives	It's very important that a number of reasonable alternatives be addressed in the draft environmental impact statement, including those relating to a combination of water conservation, reclamation and groundwater recharge methods.
Transcript	St. George, Utah January 8	745	1667	Socioeconomics	As someone who pays taxes in Washington County, I'm very concerned about potential economic impacts. For example, I read the review by over 20 Utah university professors criticizing the state of Utah's economic justification for the Lake Powell Pipeline. That analysis indicated that water rates in Washington County could increase by over 300 percent.
Transcript	St. George, Utah January 8	745	1668	T&E Species	I recently learned that near the terminus of the proposed Lake Powell Pipeline by Sand Hollow Reservoir are threatened Mojave Desert Tortoises and their habitats. I'm concerned about the cumulative and growth inducing impacts of the Lake Powell Pipeline in terms of further loss of desert tortoises' habitats in Washington County and the upper Virgin River

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Transcript	St. George, Utah January 8	745	1669	Water Law	The first issue deals with the Colorado River Compact that was developed and implemented in the 1920s. Experts acknowledge now that the Colorado Compact made excessive allocations of water to western states, in light of what we now know about precipitation patterns and rates in the Colorado River Basin. I understand that under the Compact, it may be prohibited or limited to divert upper basin water for a lower basin use. · Utah's application for the Lake Powell Pipeline would be using Green River upper basin water for transfer through the Lake Powell Pipeline to Kane and Washington Counties. · Clearly, this Utah allocation is upper basin, whereas the water would be used in a lower basin area. So this issue of diversion of an upper basin allocation to a lower basin use should be reconciled in the draft EIS. In addition, I understand that Utah's allocation may be junior to other senior water allocations and rights held in other western states, especially lower basin states and perhaps some sovereign Indian tribes. · This issue also needs to be addressed in the draft environmental impact statement. Finally, I understand that a water export permit may be needed from the state of Arizona because the Lake Powell Pipeline water would be diverted from a location in Arizona and travel through Arizona before returning to Utah and Sand Hollow Reservoir. · The draft EIS needs to identify if an Arizona water export permit or other Arizona authorization may be needed.
Transcript	St. George, Utah January 8	745	1670	Areas of Critical Environmental Concern (ACEC)	I also understand that the Bureau of Land Management has been asked to amend the existing Arizona strip field office resource management plan to allow the Lake Powell Pipeline to go outside of an established utility corridor and through a portion of the existing Kanab Creek area of critical environmental concern. · I do not believe that it would be appropriate to amend this BLM plan or undermine the protection of this important area of critical environmental concern. In any case, the draft environmental impact statement should provide a clear justification for why this plan amendment and change to the area of critical environmental concern should be done and why alternatives consistent with the current plan and designation could not be used.
Jim	Clark	746	444	Other	Each transmission line requires three separate cables, similar to the three conductors required for aboveground transmission lines. They are not ho used together in a pipe, but are set in concrete ducts or buried side-by-side. Each cable consists of a copper or aluminum cnnducto 1: and a serni -conducting shield at its core. A cross-

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					linked polyechrlenc insu lation surr ounds rhc core. The outer covering of the cable consists o f a metallic sheath and a plastic jacket (Figure 3).
Frederic C.	Johnson	747	445	Alternatives	Attention should be focused on tapping the basins of the "West Desert" Basin and Range Province with deep drill holes into the Lower Carbonate aqu ifers that should produce clean water with thousands of years of recharge potential.
Frederic C.	Johnson	747	446	Alternatives	Years ago with Senator Harry Reid's push to get legislation for Nevada resources, Congress mandated the US Geological Survey to study the deep Aquifers along the Nevada -Utah Border. Utah should enlist the excellent resources of the Utah Geological Survey to use these USGS studies and implement others to understand that even as close a Beaver Dam Wash area, large storage aquifers could be available at much shorter distances from the growth areas (St George, Utah) than Lake Powell.
Frederic C.	Johnson	747	447	Cumulative Impacts	Studies done at Scripps Institute have suggested that the rate of siltation from Colorado River Water influx to Lake Powell could silt the lake in within 30 years. This would make the proposed pipeline an unsustainable project.
Frederic C.	Johnson	747	448	Alternatives	With Basin and Range deep carbonate water, drill holes could be drilled, capped, and then tapped when the growth arr ives. At those times Utah could implement the incremental building of facilities that have shorter supply lines and cleaner water for the long term future of Southern Utah. Beaver Dam Wash and Hamlin Valley should be studied further before buying into the further away and risky Lake Powell Pipeline. If determined more feasible, this alternative would allow costs to be spread through time incrementally with water being made available from shorter d istances with less money to meet the needs of growth.
Frederic C.	Johnson	747	449	Other	Studies should look into gradients that must be covered on any pipe line.
Frederic C.	Johnson	747	450	Seismic Activity	Along with the risk of siltation of the lake in the future, there will be a time or even several times when movements along the active Hurricane Fault will negatively affect the facilities planned there. Remember the 1990's earthquake and dam rupture at Quail Creek Reservoir. The Epicenter was be low the Hurricane Fau lt.

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Frederic C.	Johnson	747	451	NEPA Process	This does not give the opportunity of free speech discourse where people can hear alternatives and add that to their thought processes. Efforts should be made to allow a public forum where the public can talk to officials and the public so that all can hear alternate, like, and opposing viewpoints.
Emilie	Martin	748	452	Water Supply	Determine the high probability of the long term water supply feeding the pipeline That is a very complicated issue and it must be studied honestly. From what I read, Lake Powell is storing less water the past 10 years since the lake holds less water each year. One must be very careful when assessing the amount of water available for use in this arid climate where the climate is changing dramatically.
Emilie	Martin	748	453	Water Resources	Add a water conservation element to the EIS statement. Also evaluate the costs and yields of major water conservation methods.
Emilie	Martin	748	454	Socioeconomics	A thorough study of the financial impacts on families in the region needs to be done.
Emilie	Martin	748	455	Alternatives	Less expensive alternatives to the pipeline need to be considered.
Transcript	Kanab, Utah January 7 5:47pm	749	759	Water Supply	Where would we store 4,000 acre-feet a year of water?· I've been to Jackson Flat Reservoir, and they keep it filled from Kanab creek, which they could obviously divert water from one to the other.· I think on your -- the map, it goes right by within several miles of the Jackson Flat Reservoir, and then it swings through Fredonia and back up to Colorado City.· And I'm wondering if Fredonia, Colorado City get any water.
Transcript	Kanab, Utah January 7 5:47pm	749	761	Mitigation	I imagine if a 69-inch water pipe broke, somebody would have a flood on their hands.· I think it would be nice to know how that is going to be mitigated.
Transcript	Kanab, Utah January 7 5:47pm	749	764	Socioeconomics	·I wonder how much it's going to cost. Mike Noel told us it was going to cost Kane County 25 to \$35 million in the reduced version of the pipeline.· And I did some calculating on that, per household, and I believe it was \$7,000 per household in Kane County.

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Transcript	Kanab, Utah January 7 5:47pm	749	767	Water Supply	·In the late 1990s, Lake Powell and Lake Mead were basically a full pool.· Since then, in the last two decades, both lakes have dropped, kind of together, in fits and starts.· Sometimes one's higher than the other, but they've basically both dropped well below 50 percent of capacity. · · · · ·I think the Lake Powell Pipeline puts a huge burden and dependency on a source of water that is, I don't think, going to be there in the same way that we expect it to
Transcript	St. George, Utah January 8 5:50pm	750	774	Native American Concerns	I would be interested in ensuring that the Kiabab tribe -- and I don't know if I'm pronouncing that right -- is -- I know that they're included as a partner, but I think that their input and, you know, their historical ownership of the land, I think, is extremely important.· And we should make sure that we're working closely with them to meet their needs.
Transcript	St. George, Utah January 8 5:50pm	750	775	Mitigation	This proposed pipeline puts a power pole in my yard... I'm extremely concerned about the possibility of having power lines over my pool... And I will lose value in my home if this happens.
Transcript	St. George, Utah January 8 5:50pm	750	777	Socioeconomics	but if there was a planned power line come through our neighborhood like that, the public should be notified. · · · · ·Potential buyers and builders are even unaware that this was happening until recently.· And if this pipeline is installed, we will have no choice but to try to sue the government for failing to notify us prior to the purchase of our property. · · · · ·This will have a financial impact of probably \$200,000 to us.· And we will be forced to move because we believe these power lines are detrimental to our health and severely limits the buying public for resell of our property. · · · · · ·The City of Hurricane claims they have -- they are also unaware of this, of this power line. And this issue should have been made public.·
Transcript	St. George, Utah January 8 5:50pm	750	778	Other	·So along with considering all of the environmental issues, I think we need to also consider the effect it can have on power resources.

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Transcript	St. George, Utah January 8 5:50pm	750	779	Public Health and Safety	the impact on the health issues of the power lines.· Different data has proven that they're not very, you know, healthy.
Transcript	St. George, Utah January 8 5:50pm	750	780	Alternatives	it's my understanding that there's been some confusion about the ability to use underground direct buried cable.· And I was a lineman for 24 years.· Direct bury of 69 kV is very doable in this circumstance.· And I just wanted to know if they've given good, due consideration to that possibility.
Transcript	St. George, Utah January 8 5:50pm	750	782	Water Resources	I have concerns about the pipeline, environmentally, because of the quagga clam -- or excuse me, mussel from Lake Powell, which is infested.· I have heard about the alternative of using an insecticide or herbicide to kill them as the water enters the pipeline, but that will render the water being pumped into the Sand Hollow Reservoir, which is our drinking water supply, with toxins.
Transcript	South Jordan, Utah January 9 6:03pm	751	739	NEPA Process	So I am particularly concerned about why the Provo office decided to rush the environmental impact statement. I would like to know, in writing, via email or mail to my office and/or my email, zach@utahrivers.org, why it was that Rick Baxter and any of the other Provo office staff decided to rush this.· I expect that there needs to be a reason that is more than just "We need to get this approved."· I'm displeased to learn that Mr. Baxter decided to rush this during the holidays of 2019, specifically, to keep the public from being involved.
Philip A.	Strobel	752	788	Purpose and Need	While we understand that changes to the proposed project design reduces dredged and fill impacts to waters of the U.S. such that the project can likely be authorized under a general Clean Water Act Section 404 permit, we recommend a project purpose statement be developed that accommodates both the Clean Water Act (CWA) and National Environmental Policy Act (NEPA). The EPA recommends working with the Corps to develop a purpose and need statement that is broad enough to encompass an appropriate range of both "reasonable" (per NEPA) and "practicable" (per CWA Section 404) alternatives to meet the basic (i.e., underlying) project purpose. The statement should be broad enough to include the proposed action and other available water supply and management options without eliminating

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					less environmentally damaging alternatives that may be considered practicable under the CW A Section 404 implementing regulations. The coordinated purpose and need statement should be developed prior to establishing subsequent screening criteria and identifying alternatives. In our experience, efforts to meet the requirements of both NEPA and CW A Section 404 can provide for a more efficient planning and permitting process, while the use of an overly narrow project purpose has the potential to result in the need to conduct additional analysis to meet NEPA and CW A Section 404 requirements. When projecting the water need, we recommend that the Draft EIS describe and quantify the gap between supply and demand. Important considerations in the demand analysis include identifying project participants, community growth projections (e.g., per State Demographer information), and existing and projected future use by each entity (municipal, agricultural, industrial) utilizing consistent methodology (e.g., gallons per day or gallons per capita). It is informative to describe any available water demand estimates associated with the current community master planning build-out scenarios. If available, it is also helpful to provide similar community-type demand estimates or ranges for comparison purposes.
Philip A.	Strobel	752	807	Alternatives	We recommend the lead agency structure the Draft EIS alternatives analysis so that it is consistent with requirements under both CW A and NEPA. While we understand that changes to the proposed project design have reduced dredged and fill impacts to waters of the U.S. such that the project can likely be authorized under a general Clean Water Act Section 404 permit, it remains uncertain whether future changes to the project design may occur that may necessitate an individual permit. We recommend that the Draft EIS summarize the regulatory criteria and processes utilized to screen potential alternatives and develop the range of reasonable and practicable alternatives, including any environmental, logistical, technological and cost criteria applied. Providing the reasoning used to eliminate alternatives is also helpful in understanding the decision process. As required by regulation, the screening rationale should be consistent with the practicability definition and criteria outlined in the preamble language of the CWA 404(b)(1) Guidelines (40 CFR § 230.10) for applicable projects.

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Philip A.	Strobel	752	808	Alternatives	The EPA recommends exploring both structural and non-structural options to meet the underlying project purpose when considering a range of alternatives. Alternatives could include a combination of non-structural and structural components that together may present a practicable alternative that is potentially less damaging than a single larger structural option. For example, for municipal, industrial or irrigation supply, assess the extent to which the need for water could be reduced through available conservation measures. We recommend considering whether remaining need could be partially or fully met through other non-structural measures such as temporary or permanent agreements for use of agricultural water rights, conjunctive use of groundwater and surface water supplies, availability of other water rights that may be less damaging to aquatic resources, blending raw water, or a combination of these or other alternatives. Because nonstructural options (e.g., conservation, water rights leasing) may individually contribute less towards meeting the project purpose and need than structural options, we recommend designing screening criteria so that non-structural components are not eliminated solely on the basis of their potentially smaller individual contributions.
Philip A.	Strobel	752	809	Alternatives	Because this project will also likely supply rural water needs, in addition to the considerations mentioned above, we recommend assessing the extent to which the need for supplemental irrigation water could be met through more efficient irrigation practices (e.g., center pivot or linear move irrigation systems, irrigation pipelines, remote-controlled water ditch gates, and irrigation water management). Additional alternatives to consider for agricultural shortages include rotational fallowing, dry year leasing, gravel pit storage, acquiring and utilizing existing storage from reservoir companies, expansion of non-potable supplies, developing wastewater reuse infrastructure, acquisition of additional shares of irrigation company water rights or purchase of additional water rights in ditch companies.
Philip A.	Strobel	752	811	Alternatives	For a complete NEPA analysis, the EPA recommends assessing available conservation measures and presenting the results of the assessment in the Draft EIS. We recommend that conservation be used as a tool to reduce demand at the project purpose stage. Another option would be to consider demand management (i.e., an identified level of conservation) in the alternatives analysis, either alone or in

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					combination with other supply management components. Whether as a demand reducer or alternative component, we recommend that the Draft EIS quantify the potential role of conservation in reducing future demand/supply needs and identify how these conservation measures can be implemented. In instances where a project proponent determines that certain conservation measures are not practicable under CW A Section 404(b)(1) Guidelines, we recommend that the EIS document the rationale. Depending on the type and amount of anticipated population growth, EPA's Smart Growth Principles may be useful in considering available measures to reduce demand (see https://www.epa.gov/smartgrowth/smart-growth-and-water).
Philip A.	Strobel	752	814	Alternatives	When evaluating project effects, we recommend using existing environmental conditions as the baseline for comparing impacts across all alternatives, including the no-action alternative. This provides an important frame of reference for quantifying and/or characterizing magnitudes of effects and understanding each alternative's impacts and potential benefits. This is particularly important when there are environmental protections in place that are based on current conditions, such as total maximum daily loads (TMDLs) for impaired river segments. It can also be useful, although often less certain, to compare alternatives against a no action baseline that includes reasonably foreseeable future conditions. The EPA recommends that the NEPA analysis compare and present impacts to resources against the existing conditions baseline using a consistent method to measure project impacts for all alternatives. By utilizing existing environmental conditions as a baseline, future changes to environmental resources can be more accurately measured for all alternatives, including the No Action alternative. We recommend that Reclamation consider the following when defining baseline conditions: <ul style="list-style-type: none"> • Verifying that historical data (e.g., data 5 years or older) are representative of current conditions. • Providing a detailed hydrologic analysis to adequately assess the project's potential biological and geomorphic impacts. At a minimum, include wet, average, and dry year analyses at a daily time-step. Also consider potential influences of temperature and precipitation trends on future hydrology. • Including resources directly impacted by the project footprint within the geographic scope of analysis, as well as the resources indirectly (or secondarily) impacted by the project. These indirectly impacted areas may include

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					downstream segments, source streams where water diversions will occur, and any other resource areas which may be affected by changes in water management or operations. • Include a description of water supply quantities in the context of water rights on the Colorado River, and how such quantities are expected to change as a result of future climate conditions, absent a project.
Philip A.	Strobel	752	817	Socioeconomics	Improving the accessibility of water to Washington County may have the potential to result in indirect impacts (40 CFR Part 1508.8(b)) by inducing growth in the county. We recommend that the Draft EIS include an analysis of potential growth-related impacts. Identify resources that may be affected by induced growth in the counties to be served by the pipeline and include a discussion of strategies to reduce impacts if adverse effects cannot be avoided or minimized. If it is determined that there would be no impacts or insignificant impacts to resources of concern, provide the rationale used to support the impact determination. Indirect impacts of development should also be analyzed, including projected locations, timing, and amount of growth.
Philip A.	Strobel	752	820	Cumulative Impacts	In analyzing cumulative impacts associated with each alternative, we recommend describing past diversion impacts in the project area including incremental impacts from historical water management operations and their impacts to streams, associated wetlands and aquatic habitat. If there are other reasonably foreseeable water diversion and water management projects that will have a relationship with this project, we recommend that the Draft EIS identify those relationships to aid in the disclosure of any cumulative impacts to the affected environment. We recommend that the Draft EIS consider whether there will be sufficient available storage for water delivered by this project. If water storage is insufficient, or projected to be insufficient in the future, we recommend that anticipated actions to expand storage and any related effects are discussed in the Draft EIS.
Philip A.	Strobel	752	822	Water Resources	The protection, improvement and restoration of wetlands and other waters of the U.S. are a high priority because they increase landscape and species diversity, support may species of western wildlife, and are critical to the protection of water quality and designated beneficial water uses. In order to illustrate effects to wetlands in the area, we recommend that the Draft EIS specifically include the following analyses or

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					<p>descriptions:• Description of impacts under individual or general permits authorizing the discharge of fill or dredge materials to waters of the U.S.;• Maps, identifying wetlands and regional water features;• Identify the direct, secondary, and cumulative impacts to waters in the geographic scope, including impacts from changes in hydrology even if these waters are spatially removed from the construction footprint. Include the secondary impacts to wetlands from loss of hydrology from water diversion/transfers, as well as the cumulative impacts to wetlands from future development scenarios based on population and growth estimates. • For wetlands potentially impacted by project alternatives, include wetland delineations and functional analysis.</p>
Philip A.	Strobel	752	824	Water Resources	<p>We recommend that the Draft EIS demonstrate that the destruction, degradation and modification of all wetlands, both jurisdictional and non-jurisdictional, will be avoided and minimized on federal land as outlined in EO 11990. This would involve mapping all wetlands within the project site, including springs, and assuring all avoidance measures are incorporated into the project. If nonjurisdictional wetlands on federal lands are going to be impacted, we recommend the Draft EIS include details on mitigation efforts that will offset the impacts.</p>
Philip A.	Strobel	752	825	Water Resources	<p>The EPA recommends that impacts to wetlands and other surface water bodies be avoided and minimized to the maximum extent practicable during waterbody crossings. Where feasible, we recommend the use of horizontal directional drilling (HDD) for the pipeline routing under water crossings and their associated floodplains and wetlands. We also recommend including an HDD contingency plan in the Draft EIS to address potential modes of failure and mitigation measures for each phase of the drilling process.If more damaging, open-cut water body crossings are proposed, we recommend that minimization measures be used to stabilize and return stream banks to preconstruction contours, and waterbody crossing areas be graded and revegetated immediately following construction. We recommend that rip-rap, gabions, or other methods to harden banks not be used or used only sparingly to control erosion and stabilize banks at stream crossings during and/or after construction. The EPA supports an overall goal to return construction sites to natural, preconstruction conditions.</p>

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Philip A.	Strobel	752	827	Water Resources	When assessing the project's impacts to streams, we recommend coordinating with state and federal resource agencies to identify critical resources in the project area. Critical resources may include species recovery areas, recreational areas, critical habitat for threatened or endangered species, segments impaired per Section 303(d) of the CWA, segments for which TMDLs have been established, receiving waters for permitted dischargers, and source water protection areas for surface water intakes.
Philip A.	Strobel	752	828	Water Resources	Because this project may alter hydrology in both source and receiving streams, we recommend that the Draft EIS assess the projected pre- and post-project flows. Specifically, we recommend that the Draft EIS analyze any beneficial or adverse environmental effects associated with hydrology changes in the Green and Colorado Rivers between Flaming Gorge and Lake Powell, as well as in the Colorado River below Lake Powell and the Virgin River.[See attachment for table with recommended flow metrics].• If the project is projected to exacerbate low flows or high flow events, there are likely to be associated environmental impacts associated with erosion and sediment transport processes. Impacts may include changes to channel complexity, loss of channel maintenance functions, reduced aquatic habitat availability and life history adaptation. If Reclamation determines there is potential for ecologically significant hydrologic impacts, the following information may be useful to identify associated impacts to resident fish species and invertebrate assemblages, including: <ul style="list-style-type: none"> o Any available baseline data regarding functional species composition, diversity, evenness, abundance, and, for macroinvertebrates, % EPT and some characterization of flow preference. The EPA' s rapid bioassessment protocol, or a state-specific method, may be used to describe baseline habitat quality; o Characterization of predicted shifts in species composition, impacts to less tolerant species, and changes in functional composition between current baseline and postproject environment; o Impacts to physical habitat, including availability, heterogeneity, connectivity, and long-term habitat maintenance; • A description of mitigation measures for potentially adverse impacts to stream resources and aquatic life.

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Philip A.	Strobel	752	833	Water Resources	<p>Should the project modify flow through operational changes, increased diversion of water, or introduction of new water sources, we recommend the Draft EIS include an analysis of water quality that evaluates the following areas:</p> <ul style="list-style-type: none"> • Compare current water quality, post-project water quality, and the applicable NPDES or Utah water quality standards; • If the EIS identifies the potential for the project to cause or contribute to violations of water quality standards, it will be important to identify alternatives, mitigation or operational controls to avoid such impacts. If it proves difficult to determine the project's potential for impacts to water quality standards, we recommend implementing a water quality monitoring program using the Utah Department of Environmental Quality methods for relevant parameters. In such cases, monitoring should be done before, during and after project implementation to ensure compliance with the Utah water quality standards and determine water quality-based effluent limits; • Account for changes in background water quality for water quality modeling and when making determinations of assimilative capacity; • Identify reaches with existing water quality impairments per State CWA Section 303(d) lists, draft or established total maximum daily loads (TMDLs), and potentially affected dischargers and ensure the project will avoid contributing to existing impairments; o To identify impaired waterbody segments within the affected area, the Utah 2016 Integrated 305(b) Report and 303(d) List can be found at https://deq.utah.gov/legacy/programs/water-quality/monitoringreporting/assessment/2016-integrated-report.htm; o Source Water Protection areas and explanation of how the project will be consistent with Source Water Protection planning measures; • Identify potentially affected drinking water treatment providers with intakes on reaches with predicted water quality changes as well as possible changes to treatment processes; and • Identify waste water treatment plants discharging to reaches with predicted water quality changes. Evaluate current and post-project water quality at a critical flow conditions and expected changes to assimilative capacity or permit limits for any NPDES or Utah Department of Environmental Quality discharge permits. <p>If the irrigation in the project area will increase as a result of this project, we recommend the Draft EIS consider whether</p>

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					there will be water quality effects related to return flows in receiving waters, and any associated impacts to water treatment facilities and discharge permittees.
Philip A.	Strobel	752	834	Water Resources	We recommend considering the following stormwater management and monitoring practices to avoid and minimize impacts to water quality:• Site-specific stormwater management plans for all stream and wetland crossings to ensure careful consideration is given to uniquely sensitive environments;• Applicable Best Management Practices during construction, including the use of waterbars, compost filter socks, silt fences and diversion dikes or ditches;• Timely inspection and maintenance of erosion and sediment control measures following rainstorms to stop sediment releases and repair the controls; and• For any stream crossings in areas with resources sensitive to sediment loads, water quality monitoring stations should be installed upstream and downstream of those crossings. They should be installed with as much time prior to construction as possible to establish baseline conditions and natural variation in stream conditions.
Philip A.	Strobel	752	835	Water Resources	We would anticipate this project has the potential to both positively and negatively impact groundwater resources. In assessing the potential impacts of each alternative on groundwater systems in the project area, we recommend that the Draft EIS examine the potential for changes in the volume, storage, flow and quality of ground water using available characterization of ground water resources and ground water use. Projected construction, operation or maintenance of a project may have significant impact on these facets of the natural system mentioned above. If the EIS identifies any adverse impacts to groundwater resources, we recommend considering alternatives, mitigation measures or operational controls that would avoid, reduce or minimize impacts on groundwater.
Philip A.	Strobel	752	836	Air Quality	We recommend evaluating and disclosing current air quality conditions, identify any potential air quality impacts and, if necessary, detail mitigation steps that will be taken to minimize associated adverse impacts. We recommend that consideration be given to opportunities to reduce vehicle emissions by limiting unnecessary vehicle idling, as well as minimizing road and construction-related fugitive dust emissions (as appropriate) through the application of best management practices such as dust

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					<p>suppression practices. Components to be presented in the Draft EIS documentation include the existing air quality conditions in the project vicinity, both in Arizona and Utah, and an assessment of any impacts on National Ambient Air Quality Standards (NAAQS), Prevention of Significant Deterioration standards, air quality related values (AQRVs), and an assessment of any Class 1 Areas in the vicinity that may be impacted by construction or operation emissions. We understand that Kane County and Washington County in Utah are both currently in attainment for all six ambient air quality NAAQS (see 40 CFR 81.345), and therefore both Transportation Conformity (40 CFR 93, Subpart A) and General Conformity (40 CFR 93, Subpart B) do not apply. In coordination with EPA's Region 9 Office, we have confirmed that Coconino and Mohave counties in northern Arizona are also in attainment for all six ambient air quality NAAQS (see 40 CFR 81.303). Similarly, both Transportation Conformity (40 CFR 93, Subpart A) and General Conformity (40 CFR 93, Subpart B) do not apply.</p>
Philip A.	Strobel	752	837	Mitigation	<p>The EPA recommends that each alternative in the Draft EIS identify available mitigation where impacts are expected. Where Reclamation identifies the potential for significant water or air quality impacts, we recommend monitoring and modeling efforts are considered for accurately assessing current conditions, predicting project impacts, and ultimately supporting adequate mitigation planning and implementation of effective mitigation. The higher the uncertainty is surrounding project impacts, the more emphasis there should be on providing mitigation details to assure protection of aquatic resources. Where the EIS commits to mitigation, we recommend specifying the entity responsible for implementing the mitigation and a schedule for when the mitigation will be applied. If the project includes mitigation intended to avoid impacts to regulatory thresholds, we recommend including the following additional information in the Draft EIS:</p> <ul style="list-style-type: none"> • A defined mitigation monitoring plan to track the effectiveness of the mitigation, including baseline monitoring if data are lacking; • Specific management decision points based upon protecting the minimum desired environmental conditions (thresholds) in the project area, which would trigger action; • Management alternatives and mitigation measures that would be implemented should a threshold be exceeded; • Identification of short and long-term

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					financial assurances;• Mechanisms for public disclosure of the analysis and management decisions; and• Specific temporal milestones to meet rehabilitation standards.We emphasize the importance of the Draft EIS including details on mitigation measures for any impacted resource, especially effects related to water quality, wetlands, stream morphology and aquatic life impacts. Also, ensure that any mitigation details presented are consistent with the 2008 Rule on Compensatory Mitigation for Losses to Aquatic Resources for CW A Section 404 related impacts.
Philip A.	Strobel	752	838	Special Status Species	The project area may contain special status species, including Endangered Species Act listed threatened species and endangered species, as well as candidate species. The EPA recommends engaging the U.S. Fish and Wildlife Service (FWS) as early in the analysis as possible to assure that the proposed alternatives account for the following:• River restoration, flow and channel modifications, wetlands, and habitat fragmentation regarding species' habitat requirements;• Migratory Bird Treaty Act compliance; and• Protection from invasive species.
Philip A.	Strobel	752	840	Aquatic Invasive Species	The EPA recommends that the Draft EIS analyze the project's potential to increase the spread of invasive species by means of pipeline transmission to the receiving basin, or streams along the proposed alignment such as Kanab Creek and the Paria River in the event of a leak or spill. We recommend that the Draft EIS specifically consider quagga mussels (<i>Dreissena bugensis</i>) and provide details on any measures that would be implemented to prevent the project from spreading invasive species.
Philip A.	Strobel	752	841	Native American Concerns	There are currently two pipeline alignments proposed, the Southern Alternative and the Highway Alternative, which begin and end in the same location. The Southern Alternative would travel south of the Kaibab Indian Reservation while the Highway Alternative alignment may cross Tribal trust lands, which EPA understands require the Bureau of Land Management and the Bureau of Indian Affairs to issue Right of Way grants and require a tribal resolution from the Kaibab Band of Paiute Indians. We understand that Reclamation is reinitiating government to government tribal consultation with Indian tribes, as well as consultation under section 106 of the National Historic Preservation Act. If the project area is located in a potential Environmental Justice area, the Draft EIS is required to address whether any

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					minority or economically-disadvantaged communities will be disproportionately and adversely affected by the project. The 2016 Report, Promising Practices for EJ Methodologies in NEPA Reviews, may be helpful and can be found at https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf .
Edward L.	LaRue, Jr., M.S.	753	846	Purpose and Need	After reading the NOI, the Council was unable to find information explaining the need to provide an additional 86,249 acre -feet of water [we presume per year] to the St. George area and the limitation of constructing a 140 -mile long pipeline from Lake Powell. Absent this information, we are left with the impression that Reclamation has artificially narrowed the purpose and need of the proposed action. The Council contends that Reclamation has an obligation to develop and analyze other viable alternatives to constructing the pipeline to deliver water. To support this contention, we note that a federal appellate court has previously ruled that in its EIS a federal agency must evaluate a reasonable range of alternatives to the project including other sites, and must give adequate consideration to the public’s needs and objectives in balancing ecological protection with the purpose of the proposed project, along with adequately addressing the proposed project’s impacts on the desert’s sensitive ecological system (National Parks & Conservation Association v. Bureau of Land Management, Ninth Cir. Dkt Nos. 05 -56814 et seq. (11/10/09). Therefore, the Council requests that Reclamation frame the purpose and need by explaining the need to provide water and develop and analyze other viable alternatives in addition to granting the ROW for the Lake Powell Pipeline, that is “other reasonable courses of actions” (40 CFR 1508.25).
Edward L.	LaRue, Jr., M.S.	753	847	Alternatives	The alternatives analysis should include an economic analysis that provides the total cost of constructing the pipeline versus other alternatives, so the public can see how much the total cost of each alternative is. This would include an analysis of the costs of replacing all public resources that would be lost from granting the ROW for the development of the pipeline including direct, indirect, and cumulative impacts. Please note, this analysis would include replacement or creation costs including the time needed to achieve full replacement, not just acquisition, management, monitoring, and adaptive management costs.

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Edward L.	LaRue, Jr., M.S.	753	849	Alternatives	Pursuant to Section 1508.25 of the Council on Environmental Quality’s (CEQ) regulations (40 CFR 1508.25), any environmental impact statement (EIS) must cover the entire scope of a proposed action, considering all connected, cumulative, and similar actions in one document. Pursuant to Section 1506.1(a) of these regulations, an agency action cannot “[l]imit the choice of reasonable alternatives” before reaching a final decision in a published [Record of Decision] (ROD). These regulations ensure agencies will prepare a complete environmental analysis that results in a “hard look” at the environmental consequences of all proposed actions instead of segmenting environmental reviews (Novack 2015). The Council is concerned that the proposed Northern Corridor Highway and proposed Lake Powell Pipeline project are being segmented by their separate analyses. They appear to be connected actions, as St. George wants both for population and economic growth and to deal with future traffic issues . Please explain whether these proposed actions are connected and if not, why.
Edward L.	LaRue, Jr., M.S.	753	854	T&E Species	Densities and Distributions of Tortoises Potentially Affected• Identify and show those portions of the two alignment alternatives that occur within the range of the listed population of the Agassiz’s desert tortoise (USFWS 1990).• Identify and show those portions of the two alignment alternatives that occur within designated critical habitat of the listed population of the Agassiz’s desert tortoise (USFWS 1994); Bureau of Land Management (BLM) Areas of Critical Environmental Concern (ACEC) and in Arizona, designated categories of tortoise habitats; National Park Service (NPS) lands; and any other biologically sensitive areas [e.g., proximity to wilderness areas, National Conservation Lands (NCL), etc.] .• As per the latest guidance from the U.S. Fish and Wildlife Service (USFWS 2018), ensure that protocol-level surveys for the desert tortoise are performed in suitable habitats on western portions of the alternative pipeline s during the most active periods (April -May and/or September/October) so that density estimates of tortoises that may be affected by the two alternatives can be estimated and reported in the DEIS. • Prior to performing protocol surveys, the proponent must enlist only biologists who have demonstrated experience in surveying for tortoises. The proponent and qualified biologists must meet with pertinent biologists of the USFWS, BLM, and NPS to

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					determine a realistic action area as defined by 50 Code of Federal Regulations 402.2. Agencies should also advise the proponent of suitable survey methodologies for the alternative pipelines. • Given the sensitivity of the project, the Council believes that only 100% surveys with appropriate zone of influence studies should be performed. “Probabilistic sampling” as described in USFWS (2018) should not be performed unless prior approval is obtained from USFWS, BLM, and NPS. • Similarly, if any previous surveys were performed more than a year ago, the surveys should be performed again, unless USFWS expressly agrees new surveys are not needed. • At a minimum, the DEIS must show, for both alternatives, (1) those portions of the pipelines that are occupied and unoccupied by tortoises; (2) locations of all scats, burrows, carcasses, tortoises, and other diagnostic signs; (3) based on the results, estimate the number of tortoises that would be affected by the two alternatives; and (4) provide estimates of the acres of suitable, occupied, and critical habitats (also acres within designated ACECs and NCL lands) that would be permanently and temporarily impacted by construction, operation, and maintenance
Edward L.	LaRue, Jr., M.S.	753	858	T&E Species	• The DEIS should include a thorough analysis and discussion of the status and trend of the tortoise in the action area, tortoise conservation area, recovery unit, and range wide. Tied to this analysis should be a discussion of all likely sources of mortality for the tortoise and degradation and loss of habitat from construction, operation, and maintenance of the two pipeline alternatives.
Edward L.	LaRue, Jr., M.S.	753	859	Socioeconomics	• Per the NOI, “The pipeline would deliver up to 86,249 acre-feet of water from Lake Powell to Sand Hollow Reservoir. UBWR proposes building the LPP in order to bring a second source of water to Washington and Kane Counties in Utah to meet future water demands, diversify the regional water supply portfolio, and enhance the water supply reliability.” We note that supplying additional water to urban sites fosters human population growth and expansion (e.g., the construction of additional housing, businesses, roads, utilities, etc.) We are concerned that the proposed action will result in growth-inducing impacts in the St. George area that will adversely affect the desert tortoise. Under 40 CFR 1508.8(b), “Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land

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					use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”
Edward L.	LaRue, Jr., M.S.	753	860	T&E Species	<ul style="list-style-type: none"> We request that the DEIS fully analyze, not describe, the growth -inducing effects of constructing, operating, and maintaining a pipeline that brings additional water to the St. George area with respect to impacts on (1) the survival and recovery of the tortoise at the population, recovery unit , and species level; (2) its habitats ; and (3) its population and habitat connectivity. In addition , we request that the DEIS include safeguards that would prevent these growth - inducing effects from impacting the tortoise and its habitats.
Edward L.	LaRue, Jr., M.S.	753	861	Cumulative Impacts	<ul style="list-style-type: none"> In the cumulative effects analysis of the DEIS, please ensure that the Council on Environmental Quality’s (CEQ) “Considering Cumulative Effects under the National Environmental Policy Act” (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, “Determining the cumulative environmental consequences of an action requires delineating the cause -and -effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects.” The analysis “must describe the response of the resource to this environmental change.” Cumulative impact analysis should “address the sustainability of resources, ecosystems, and human communities.” For example, the DEIS should include data on the estimated number of acres of tortoise habitats and the numbers of tortoises that may be lost to growth -inducing impacts in the St. George and other affected regions .
Edward L.	LaRue, Jr., M.S.	753	862	Water Resources	<p>Following are some of the studies that should be performed, seasonally in some cases, and their results reported and analyzed in the DEIS .</p> <ul style="list-style-type: none"> A jurisdictional waters analysis should be performed for all potential impacts to washes, streams, and drainages.

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Edward L.	LaRue, Jr., M.S.	753	864	Special Status Species	Following are some of the studies that should be performed, seasonally in some cases, and their results reported and analyzed in the DEIS . • There are likely to be special status plant species found along the two alternatives as determined by appropriate literature reviews and followed by field surveys, the results of which would be reported in the DEIS. Surveys must be completed at the appropriate time of year by qualified biologists (preferably botanists) using the latest acceptable methodologies .
Edward L.	LaRue, Jr., M.S.	753	865	Mitigation	<ul style="list-style-type: none"> • The DEIS should include appropriate mitigation for all direct, indirect, and cumulative effects to the tortoise and its habitats; the mitigation should use the best available science with a commitment to implement the mitigation commensurate to impacts to the tortoise and its habitats. As a minimum the proponent should develop and implement a fully -developed desert tortoise relocation plan; predator management plan; weed management plan; fire management plan; compensation plan for the temporal degradation and loss of tortoise habitat that includes protection of the acquired, improved, and restored habitat in perpetuity for the tortoise from future development and human use; a plan to protect adjacent tortoise habitats that can be accessed as a result of the new pipeline right -of-way road and access roads in those areas where new access is created; and a habitat restoration plan for disturbed areas that are not required for pipeline maintenance. • These mitigation plans should include an implementation schedule that is tied to key actions of the construction, operation, maintenance, and restoration phases of the project so that mitigation occurs concurrently with or in advance of the impacts. The plans should specify success criteria, include a monitoring plan to collect data to determine whether success criteria have been met, and identify actions that would be required if the mitigation measures do not meet the success criteria. Because increased vehicle access may result in subsequent fires, we request that the DEIS include a fire prevention plan in addition to a fire management plan. • In 2016, the Council funded the completion of best management practices for habitat restoration (Abella and Berry 2016), which are attached to this letter for your consideration and implementation. • Explain how the proponent will minimize the direct loss of desert tortoise habitats by using existing disturbance and avoiding sensitive areas, such as designated critical

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					<p>habitat and other sensitive areas (e.g., ACEC, NCLs, etc.).</p> <ul style="list-style-type: none"> • Develop a specific program to avoid subsidizing known tortoise predators, including common ravens and coyotes, particularly during construction. If deemed applicable by the agencies, the proponent should contribute to the National Fish and Wildlife Foundation's Raven Management Fund for regional and cumulative impacts. • Ensure that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a project - specific management plan for common ravens. This template includes sections on construction, operation, maintenance, and restoration with monitoring and adaptive management during each project phase (USFWS 2010). • Compensate for lost habitats through either habitat acquisition, mitigation fees, or other existing programs acceptable to the regulatory agencies. Compensation may be variable depending on the sensitivity of habitats impacted, which should also be documented in the DEIS. • Define protocols for displacing tortoises and monitoring them until qualified biologists judge they are out of harm's way. We assume that tortoises would be relocated into adjacent suitable habitats rather than translocated en masse to some distant location, and that the methods will be disclosed in the DEIS. • We request that the DEIS address the effects of the proposed action on global warming , as the proposed action is growth -inducing from a development perspective, and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the pipeline alignments that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human -caused fires); and how the proposed action may affect the likelihood of human -caused fires. We strongly urge the proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport and spread of nonnative seeds and other plant propagules to/within the project area and eliminate/reduce the likelihood of human -caused fires. The plan should integrate vegetation management

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					with fire management and fire response. • Given the above concerns, the DEIS should include a weed abatement program, monitoring plan, and identify remedial activities to ensure the project does not result in the proliferation of non -native plant species, particularly in sensitive habitats identified herein. • We are concerned that the placement of this pipeline may fragment regional connectivity between tortoise corridors occurring in adjacent areas. The placement of either alignment may fragment travel corridors and may substantially reduce or destroy their functions in the future as wildlife corridors. We strongly request that the environmental consequences section of the DEIS include a thorough analysis of this indirect effect (40 Code of Federal Regulations 1502.16) and appropriate mitigation to maintain the function of population connectivity for the Agassiz’s desert tortoise and other wildlife species be identified .
Edward L.	LaRue, Jr., M.S.	753	883	Travel Management	<ul style="list-style-type: none"> • We are concerned that new access through currently natural habitats may result with development of the pipeline, and that the extent of the impact would vary depending on how much of either pipeline coincides with existing developed corridors. As such, we request that the DEIS include information on the locations, sizes, and arrangements of new and improved roads for both alternatives, who will have access to them, whether the project area will be secured to prevent human access or vandalism, and if so, what methods would be used. The presence of roads even with low vehicle use has several adverse effects on the desert tortoise and its habitats. Besides the direct adverse effect of vehicle impacts resulting in injury or mortality, the indirect effects include the deterioration/loss of wildlife habitat, hydrology, geomorphology, and air quality; increased competition and predation (including by humans); disruption of tortoise movements and fragmentation of habitats; and the loss of naturalness or pristine qualities, all of which should be analyzed in the DEIS. • Road establishment is often followed by various indirect effects such as increased human access causing disturbance of species’ behavior, increase predation, spread of invasive species, and vandalism and/or collection. All indirect effects to the tortoise should be analyzed in the DEIS. The analysis of the effects from road establishment and use should include cumulative effects to the tortoise with respect to nearby tortoise ACECs, areas designated/needed for connectivity between ACECs, for the

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					recovery unit, and range wide. • The DEIS should analyze the five major categories of primary road effects to the tortoise and special status species: (1) wildlife mortality from collisions with vehicles; (2) hindrance/barrier to animal movements thereby reducing access to resources and mates; (3) degradation of habitat quality [needed for adequate nutrition for successful reproduction and recruitment]; (4) habitat loss caused by disturbance effects in the wider environment and from the physical occupation of land by the road; and (5) subdividing animal populations into smaller and more vulnerable fractions (Jaeger et al. 2005a, 2005b, Roedenbeck et al. 2007). In addition , we request that a sixth category of increased predation resulting from increased numbers of predators subsidized by “roadkill ” from road construction, use, and maintenance. • For your use, we have enclosed a road impacts bibliography to facilitate the analysis that we expect to appear in the DEIS.
connor	hansell	754	895	Water Supply	The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. Washington and Kane counties are already some of the largest per capita water users in the country. We should not incentivize more waste. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.
Ginger	Ritter	755	940	Fisheries	Both alignments cross a number of ephemeral and intermittent streams which provide habitat for native fish and amphibians. Kanab Creek in particular serves as habitat for speckled dace (<i>Rhinichthys osculus</i>) and breeding amphibians. The Department recommends a pipeline design and alignment that minimizes impacts to aquatic organisms, which would be optimized with the pipeline being underground in all environmentally sensitive areas. Another scoping issue is the potential transport of nonnative fish from Lake Powell to the Virgin River watershed via the pipeline-Lake Powell currently contains 10 nonnative fish species. The Department suggests that a thorough analysis of potential impacts to native fish and other obligate aquatic organisms in the Draft EIS is warranted.
Ginger	Ritter	755	942	Aquatic Invasive Species	Another scoping issue the Department would like to have addressed is potential transmission and dissemination of quagga mussels (<i>Dreissena rostriformis bugensis</i>)

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					via moving water from Lake Powell. Quagga mussels could be introduced into Sand Hollow Reservoir and from there into the Virgin River and into streams crossed along the pipeline route due to pipe leakage. Quagga mussels reach extremely high population densities in lakes and reservoirs, including Lake Powell, but are also capable of using riverine habitats with soft benthic sediments. The lower Virgin River Gorge serves as the primary habitat for several native fish of the Virgin River in Arizona, the inadvertent introduction of quagga mussels there could have measurable ecological consequences that would be important to identify and analyze in the EIS. Native fish species in the Virgin River and its tributaries include two endangered species, woundfin (<i>Plagopterus argentissimus</i>) and Virgin River chub (<i>Gila seminuda</i>) and a candidate species, Virgin River spinedace (<i>Lepidomeda mollispinis</i>). Other native fish include desert sucker (<i>Catostomus clarki</i>), speckled dace (<i>Rhinichthys osculus</i>), and flannelmouth sucker (<i>C. la tip inn is</i>). To complete an adequate EIS for the Project it would be important to include a quagga mussel mitigation plan that addresses the costs and consequences of the spread of quagga mussels via the pipeline into Sand Hollow Reservoir and the Virgin River.
Ginger	Ritter	755	943	Wildlife	Several wildlife species of ecological importance have been documented or are predicted to occur along both alternatives of the Project route in Arizona, including the Arizona toad (<i>Anaxyrus microscaphus</i>), western burrowing owl (<i>Athene cunicularia hypugaea</i>), ferruginous hawk (<i>Buteo regalis</i>), bald eagle (<i>Haliaeetus leucocephalus</i>), golden eagle (<i>Aquila chrysaetos</i>), the endangered California condor (<i>Gymnogyps californianus</i>), and several bat species. To develop an adequate EIS, it would be important to identify and analyze how to avoid or mitigate impacts to these and other listed and sensitive wildlife species in the project area.
Ginger	Ritter	755	948	Wildlife	To assist in developing an adequate EIS, the Department would like to highlight issues related to Species of Economic and Recreational Importance in Arizona such as mule deer (<i>Odocoileus hemionus</i>) and pronghorn (<i>Antilocapra americana</i>). These and other economically-important species occur throughout the project area and cross both alternatives. The North Kaibab-Paunsaugunt Mule Deer Migration Corridor extends from the north rim of the Grand Canyon to the southern Utah mountains near Bryce Canyon National Park and Cedar Mountain. Thousands of

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					<p>mule deer utilize this movement corridor annually as they migrate from summer habitats near Bryce Canyon and the north rim of the Grand Canyon to the areas surrounding the Arizona-Utah state line. There is an important interchange between the Arizona and Utah mule deer populations during this migration that occurs within approximately eight miles of the Utah-Arizona state line. Additional mule deer movement occurs as part of this corridor crosses Kanab Creek to Bulrush and Sunshine Points south of the Kaibab Paiute Indian Reservation (see Cramer and Hamlin 2019 for more information). The North Kaibab mule deer population that uses this corridor in Arizona holds high economic value to the Department and the public. Ensuring the corridor's continued interchange and migration capabilities is important for management of this population into the future. Highway 89 between Kanab, UT and Page, AZ bisects the southern portion of the migration route for the Utah mule deer as they migrate to northern Arizona. In 2012, the Department partnered with the Utah Department of Transportation and the Utah Division of Wildlife Resources (UDWR) to develop wildlife fencing and mule deer crossing structures across approximately 11 miles of Highway 89 in Utah where it crosses this corridor. The wildlife fencing and these structures have facilitated the continued migration of mule deer through the corridor while significantly reducing mule deer-vehicle collisions. Between 2013 and 2018, 78,610 successful individual mule deer crossings were documented at these structures. Many other species of wildlife were also documented using the structures, including mountain lion (<i>Puma concolor</i>), coyote (<i>Canis latrans</i>), elk (<i>Cervus elaphus</i>), pronghorn, and bobcat (<i>Lynx rufus</i>). If the alternative pipeline route that parallels Highway 89 is selected, it will affect the value of these crossing structures, therefore, the Department recommends that design features are implemented that do not diminish the value of the existing wildlife crossing structures and continue to allow the unimpeded migration of mule deer and other wildlife species across Highway 89 in Utah and into Arizona. In addition, the Department suggests consideration of design features for the pipeline infrastructure where it crosses Kanab Creek in Arizona. Burial of the pipeline would reduce inhibiting or modifying wildlife movement and dispersal patterns. Mitigation, such as wildlife crossing structures, would likely be required if the pipeline is not buried along</p>

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					the entire route. Pronghorn also occur along the western portion of the pipeline, west of Kanab Creek in Arizona and consistently cross into the Kaibab Paiute Indian Reservation. Burial of the pipeline to avoid inhibiting or modifying wildlife movement and dispersal patterns would be an important feature to evaluate in development of the EIS. Mitigation, such as periodic wildlife crossing structures, would likely be required if the pipeline is not buried along the entire route.
Sarah	Stock	756	1422	Other	Supporting appendices for comment number 0948.
Richard	Weber	757	975	Opinion - Opposed to Proposed Lake Powell Pipeline	Please reconsider the ultimate session on taking water from Lake Powell and diverting it for land development usage.
Melinda	McIlwaine	758	983	Alternatives	The EIS should evaluate all plan alternatives against worst -case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems —including national wildlife refuges and critical habitats —and endangered species.
Craig	Wallentine	759	991	Water Supply	After reviewing Governor Herbert's Blue Ribbon Panel report on Utah Water Policy throughout 2060 it is clear that the hyper -expensive LPP water project is a poor alternative to the more cost effective water conservation and efficiency project available in Kane/Washington Counties. Your Environmental Impact Statement (EIS) should look closely at the profligate current consumption of Kane/Washington and their lack of secondary water systems, their lack of modern tiered water use pricing like the rest of the United States and lack of "purple plumbing" codes for gray water reclamation in new construction as required in other Southwestern cities.
Craig	Wallentine	759	994	Water Supply	The EIS should also speak directly to the fact that other Upper Basin and Lower Basins states are already taking steps to address the fundamental fact that the 1922 Colorado Compact was drawn up based on pre -climate change water flows the least that Kane/Washington County can do is to reduce their water consumption to the average of their peer cities. This requires no new inventions - only good water

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					management skills and modest investment which have high rates of return as the Governor's Water Policy demands.
Craig	Wallentine	759	996	Alternatives	Finally, the EIS should evaluate all plan alternatives against worst -case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems —including national wildlife refuges and critical habitats — and endangered species. The analysis should be based on the best available science and climate models.
Marjorie	Browning	760	998	Water Supply	There's simply not enough water available in the Colorado River Basin to support an additional 28 -billion -gallon withdrawal. Committing that water to sprawl and development in Utah forecloses other downstream uses in the future. As you know other states are already having to cut their use of the river due to climate -driven flow declines. Those declines — and their associated water shortages — are expected to get worse in the future with regional drying and climate disruption. Prudent policy today will afford us more flexibility in future water management. In this case that means keeping those 28 billion gallons available for downstream ecosystems, endangered species, municipalities and agriculture.
Marjorie	Browning	760	1000	Alternatives	If you do move forward with an environmental impact statement, it should evaluate all plan alternatives against worst -case scenarios for future water availability across timelines of 10, 20, 50 and 100 years. And importantly it should take a hard look at alternatives across a range of impacts, including their ability to provide adequate water for downstream states, municipalities, endangered species, national wildlife refuges and critical habitats. The analysis should be based on the best available science and climate models.
Peter	Haderlein	854	1658	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to urge you and the Bureau of Reclamation to cancel the Lake Powell pipeline project and drop plans to do a draft environmental impact statement and public scoping period. Climate change is already impacting the available freshwater reserves of the Colorado River, and we need a responsible study of the environmental impacts that take global warming into account on time scales further than the next

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					decade. Please act accordingly to safeguard our natural resources and limit growth in arid regions.
Sue	Petteway	916	866	Opinion - Opposed to Proposed Lake Powell Pipeline	Please cancel the Lake Powell pipeline project and drop plans to do a draft environmental impact statement and public scoping period. There's simply not enough water available in the Colorado River Basin to support an additional 28 - billion -gallon withdrawal. Committing that water to sprawl and development in Utah forecloses other downstream uses in the future. This proposal is wildly unsustainable. Please — cancel the Lake Powell pipeline project and protect the Colorado River's precious water.
Don	Cox	922	869	Opinion - For Proposed Lake Powell Pipeline	I am writing you today to express my concern over the Lake Powell Pipeline Project. I cannot express enough on how much we definitely need this project. Quite frankly, St. George and the surrounding communities will not be able to sustain its growth without it. It is critical for our economy and our way of life. As you know, Southern Utah is and continues to grow at an alarming rate. We are one of the fastest growing communities in the United States and have been for several years. We will need additional sources of water to supplement our existing water supplies of the Virgin River and water wells. If we do nothing and don't plan for growth, we will definitely run out. Studies have shown that the project can and will pay for itself. I would like to propose that the Bureau of Reclamation approve the application process from the City of St. George and the Washington County Water Conservancy District, and let the process continue so that we can meet the water demands now and for future generations.
Stephen	Trimble	923	874	Opinion - Opposed to Proposed Lake Powell Pipeline	I am a registered Republican voter in rural Utah, and I'm writing to oppose the Lake Powell Pipeline. The Colorado River is over -committed already. Washington County uses shameful amounts of water per -capita. We need to work on water conservation, not build a costly boondoggle that will benefit business owners and not solve water users' issues. Think about the future in terms of constrained resources and sustainable behavior. Reject this obsolete idea that we can build and build and build indefinitely. Thank you for your vision and for listening to the people.

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DC	Young	924	880	Opinion - For Proposed Lake Powell Pipeline	<p>Please allow me to add my comments about the value and importance for the Lake Powell Pipeline project. I am fully in favor of this project and trust that it will be approved for completion. These are the reasons I support the LPP: 1. The state of Utah has rights to a portion of the water of the Colorado River. However, the state of Utah uses only a very small portion of its allocation and the addition of the LPP still leaves much of the allocation unused. The water that is to be diverted into the LPP is a very small change in the total demand. 2. The watershed contributing to the water in Lake Powell comes from Utah, Wyoming and Colorado. Utah is a significant contributor and should finally be allowed to benefit by that contribution. Certainly they have as much right to water use as does California, which is a very small contributor to the water available in the river and has taken advantage of the system by diverting more than their allotment of the river in the past. 3. Despite the negative opinion about the Glen Canyon Dam's value coming from those who would have it removed. , it has provided an almost immeasurable boost to the economy and viability to Southern Utah and Northern Arizona. Tens of Thousands benefit recreationally and thousands make their livelihood because of Lake Powell in a region that is almost totally non -productive without that reservoir. The power derived from the generation of electricity is a vital contributor to the economy of the USA. 4. The LPP would be focused on improving water availability principally for the Washington County Utah region. This region is now expanding in population rapidly, noted in 2019 as one of the fastest population growth areas of the entire USA. Currently all of its water use comes in one form or another form the Virgin River watershed which is a very small, contributor to the Colorado River volume. The county has managed the available water, both drainage and aquifer, very well, keeping water available during this growth while assuring that the aquifer remains in good condition. This is a result of the planning and action of the Washington County Water Conservation District. As the population grows the demands placed on the aquifer are scheduled to increase and there will come a point in time when the area will not be able to sustain the aquifer and without additional water resources, it will suffer the same fate as seen in areas of California, Nebraska, South Dakota and Colorado. As water demand continues to rise, the LPP is</p>

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DC	Young	924	881	Opinion - For Proposed Lake Powell Pipeline	the one project that can increase the possibility of keeping that aquifer viable as water demand rises. I encourage the BPM and all Federal agencies who have a say in the Lake Powell Pipeline to approve and support this project, that will contribute significantly to the future of the Southern Utah area, where growth is still possible and will be doable with minimum change to the natural beauty of the region. It will bring continued viability to Southern Utah and become a significant contributor to the overall value of the State of Utah to itself and to the US in general.
Cheryl	Visconti	925	893	Other	If the District can be of any assistance in compiling information or otherwise, as the scoping process leads to competing the draft EIS, we hope that you will take the opportunity to reach out to us for whatever assistance we can provide. Thank you for the opportunity to provide these comments on the scoping process for this significant EIS.
Evan	Johnson	926	896	Other	As someone who fears that humans are over -taxing our remaining (semi -) functional ecosystems, I am concerned that this expensive pipeline project to divert even more water out of the Colorado River is poorly conceived. I have heard that Lake Powell's water is already over -allocated, based on presumptions from good water years. Rather than pull more water out of the river (at great expense!), let's work on improving our water efficiency so more water can go down stream to feed wetlands and other downstream ecosystems.
Wasco,	Melanie	927	900	Purpose and Need	While we understand that changes to the proposed project design reduces dredged and fill impacts to waters of the U.S. such that the project can likely be authorized under a general Clean Water Act Section 404 permit, we recommend a project purpose statement be developed that accommodates both the Clean Water Act (CWA) and National Environmental Policy Act (NEPA). The EPA recommends working with the Corps to develop a purpose and need statement that is broad enough to encompass an appropriate range of both "reasonable" (per NEPA) and "practicable" (per CW A Section 404) alternatives to meet the basic (i.e., underlying) project purpose. The statement should be broad enough to include the proposed action and other available water supply and management options without eliminating less environmentally damaging alternatives that may be considered practicable under

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					the CW A Section 404 implementing regulations. The coordinated purpose and need statement should be developed prior to establishing subsequent screening criteria and identifying alternatives. In our experience, efforts to meet the requirements of both NEPA and CW A Section 404 can provide for a more efficient planning and permitting process, while the use of an overly narrow project purpose has the potential to result in the need to conduct additional analysis to meet NEPA and CW A Section 404 requirements. When projecting the water need, we recommend that the Draft EIS describe and quantify the gap between supply and demand. Important considerations in the demand analysis include identifying project participants, community growth projections (e.g., per State Demographer information), and existing and projected future use by each entity (municipal, agricultural, industrial) utilizing consistent methodology (e.g., gallons per day or gallons per capita). It is informative to describe any available water demand estimates associated with the current community master planning build-out scenarios. If available, it is also helpful to provide similar community-type demand estimates or ranges for comparison purposes.
Wasco,	Melanie	927	903	Alternatives	We recommend the lead agency structure the Draft EIS alternatives analysis so that it is consistent with requirements under both CW A and NEPA. While we understand that changes to the proposed project design have reduced dredged and fill impacts to waters of the U.S. such that the project can likely be authorized under a general Clean Water Act Section 404 permit, it remains uncertain whether future changes to the project design may occur that may necessitate an individual permit. We recommend that the Draft EIS summarize the regulatory criteria and processes utilized to screen potential alternatives and develop the range of reasonable and practicable alternatives, including any environmental, logistical, technological and cost criteria applied. Providing the reasoning used to eliminate alternatives is also helpful in understanding the decision process. As required by regulation, the screening rationale should be consistent with the practicability definition and criteria outlined in the preamble language of the CWA 404(b)(1) Guidelines (40 CFR § 230.10) for applicable projects.

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Wasco,	Melanie	927	904	Purpose and Need	<p>The EPA recommends exploring both structural and non-structural options to meet the underlying project purpose when considering a range of alternatives. Alternatives could include a combination of non-structural and structural components that together may present a practicable alternative that is potentially less damaging than a single larger structural option. For example, for municipal, industrial or irrigation supply, assess the extent to which the need for water could be reduced through available conservation measures. We recommend considering whether remaining need could be partially or fully met through other non-structural measures such as temporary or permanent agreements for use of agricultural water rights, conjunctive use of groundwater and surface water supplies, availability of other water rights that may be less damaging to aquatic resources, blending raw water, or a combination of these or other alternatives. Because nonstructural options (e.g., conservation, water rights leasing) may individually contribute less towards meeting the project purpose and need than structural options, we recommend designing screening criteria so that non-structural components are not eliminated solely on the basis of their potentially smaller individual contributions. Because this project will also likely supply rural water needs, in addition to the considerations mentioned above, we recommend assessing the extent to which the need for supplemental irrigation water could be met through more efficient irrigation practices (e.g., center pivot or linear move irrigation systems, irrigation pipelines, remote-controlled water ditch gates, and irrigation water management). Additional alternatives to consider for agricultural shortages include rotational fallowing, dry year leasing, gravel pit storage, acquiring and utilizing existing storage from reservoir companies, expansion of non-potable supplies, developing wastewater reuse infrastructure, acquisition of additional shares of irrigation company water rights or purchase of additional water rights in ditch companies. Conservation</p> <p>For a complete NEPA analysis, the EPA recommends assessing available conservation measures and presenting the results of the assessment in the Draft EIS. We recommend that conservation be used as a tool to reduce demand at the project purpose stage. Another option would be to consider demand management (i.e., an identified level of conservation) in the alternatives analysis, either alone or in combination with other supply management components.</p>

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					Whether as a demand reducer or alternative component, we recommend that the Draft EIS quantify the potential role of conservation in reducing future demand/supply needs and identify how these conservation measures can be implemented. In instances where a project proponent determines that certain conservation measures are not practicable under CW A Section 404(b)(1) Guidelines, we recommend that the EIS document the rationale. Depending on the type and amount of anticipated population growth, EPA's Smart Growth Principles may be useful in considering available measures to reduce demand (see https://www.epa.gov/smartgrowth/smart-growth-and-water).
Wasco,	Melanie	927	908	Baseline Effects	When evaluating project effects, we recommend using existing environmental conditions as the baseline for comparing impacts across all alternatives, including the no-action alternative. This provides an important frame of reference for quantifying and/or characterizing magnitudes of effects and understanding each alternative's impacts and potential benefits. This is particularly
Wasco,	Melanie	927	909	Baseline Effects	important when there are environmental protections in place that are based on current conditions, such as total maximum daily loads (TMDLs) for impaired river segments. It can also be useful, although often less certain, to compare alternatives against a no action baseline that includes reasonably foreseeable future conditions. The EPA recommends that the NEPA analysis compare and present impacts to resources against the existing conditions baseline using a consistent method to measure project impacts for all alternatives. By utilizing existing environmental conditions as a baseline, future changes to environmental resources can be more accurately measured for all alternatives, including the No Action alternative. We recommend that Reclamation consider the following when defining baseline conditions: <ul style="list-style-type: none"> • Verifying that historical data (e.g., data 5 years or older) are representative of current conditions. • Providing a detailed hydrologic analysis to adequately assess the project's potential biological and geomorphic impacts. At a minimum, include wet, average, and dry year analyses at a daily time-step. Also consider potential influences of temperature and precipitation trends on future hydrology. • Including resources directly impacted by the project footprint within the geographic scope of analysis, as well as the resources indirectly (or secondarily)

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					impacted by the project. These indirectly impacted areas may include downstream segments, source streams where water diversions will occur, and any other resource areas which may be affected by changes in water management or operations. • Include a description of water supply quantities in the context of water rights on the Colorado River, and how such quantities are expected to change as a result of future climate conditions, absent a project.
Wasco,	Melanie	927	921	Cumulative Impacts	Improving the accessibility of water to Washington County may have the potential to result in indirect impacts (40 CFR Part 1508.8(b)) by inducing growth in the county. We recommend that the Draft EIS include an analysis of potential growth-related impacts. Identify resources that may be affected by induced growth in the counties to be served by the pipeline and include a discussion of strategies to reduce impacts if adverse effects cannot be avoided or minimized. If it is determined that there would be no impacts or insignificant impacts to resources of concern, provide the rationale used to support the impact determination. Indirect impacts of development should also be analyzed, including projected locations, timing, and amount of growth.
Wasco,	Melanie	927	923	Cumulative Impacts	In analyzing cumulative impacts associated with each alternative, we recommend describing past diversion impacts in the project area including incremental impacts from historical water management operations and their impacts to streams, associated wetlands and aquatic habitat. If there are other reasonably foreseeable water diversion and water management projects that will have a relationship with this project, we recommend that the Draft EIS identify those relationships to aid in the disclosure of any cumulative impacts to the affected environment. We recommend that the Draft EIS consider whether there will be sufficient available storage for water delivered by this
Wasco,	Melanie	927	924	Cumulative Impacts	project. If water storage is insufficient, or projected to be insufficient in the future, we recommend that anticipated actions to expand storage and any related effects are discussed in the Draft EIS.
Wasco,	Melanie	927	932	Water Resources	The protection, improvement and restoration of wetlands and other waters of the U.S. are a high priority because they increase landscape and species diversity, support may species of western wildlife, and are critical to the protection of water quality and

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					designated beneficial water uses. In order to illustrate effects to wetlands in the area, we recommend that the Draft EIS specifically include the following analyses or descriptions: • Description of impacts under individual or general permits authorizing the discharge of fill or dredge materials to waters of the U.S.; • Maps, identifying wetlands and regional water features; • Identify the direct, secondary, and cumulative impacts to waters in the geographic scope, including impacts from changes in hydrology even if these waters are spatially removed from the construction footprint. Include the secondary impacts to wetlands from loss of hydrology from water diversion/transfers, as well as the cumulative impacts to wetlands from future development scenarios based on population and growth estimates. • For wetlands potentially impacted by project alternatives, include wetland delineations and functional analysis.
Wasco,	Melanie	927	935	Water Resources	Compliance with Executive Order 11990 Protection of Wetlands We recommend that the Draft EIS demonstrate that the destruction, degradation and modification of all wetlands, both jurisdictional and non-jurisdictional, will be avoided and minimized on federal land as outlined in EO 11990. This would involve mapping all wetlands within the project site, including springs, and assuring all avoidance measures are incorporated into the project. If nonjurisdictional wetlands on federal lands are going to be impacted, we recommend the Draft EIS include details on mitigation efforts that will offset the impacts.
Wasco,	Melanie	927	937	Water Resources	The EPA recommends that impacts to wetlands and other surface water bodies be avoided and minimized to the maximum extent practicable during waterbody crossings. Where feasible, we recommend the use of horizontal directional drilling (HDD) for the pipeline routing under water crossings and their associated floodplains and wetlands. We also recommend including an HDD contingency plan in the Draft EIS to address potential modes of failure and mitigation measures for each phase of the drilling process. If more damaging, open-cut water body crossings are proposed, we recommend that minimization measures be used to stabilize and return stream banks to preconstruction contours, and waterbody crossing areas be graded and revegetated immediately following construction. We recommend that rip-rap, gabions, or other methods to harden banks not be used or used only sparingly to

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					control erosion and stabilize banks at stream crossings during and/or after construction. The EPA supports an overall goal to return construction sites to natural, preconstruction conditions.
Wasco,	Melanie	927	938	Water Resources	When assessing the project's impacts to streams, we recommend coordinating with state and federal resource agencies to identify critical resources in the project area. Critical resources may include species recovery areas, recreational areas, critical habitat for threatened or endangered species, segments impaired per Section 303(d) of the CWA, segments for which TMDLs have been established, receiving waters for permitted dischargers, and source water protection areas for surface water intakes.
Wasco,	Melanie	927	939	Water Resources	Because this project may alter hydrology in both source and receiving streams, we recommend that the Draft EIS assess the projected pre- and post-project flows. Specifically, we recommend that the Draft EIS analyze any beneficial or adverse environmental effects associated with hydrology changes in the Green and Colorado Rivers between Flaming Gorge and Lake Powell, as well as in the Colorado River below Lake Powell and the Virgin River.
Wasco,	Melanie	927	941	Water Resources	If the project is projected to exacerbate low flows or high flow events, there are likely to be associated environmental impacts associated with erosion and sediment transport processes. Impacts may include changes to channel complexity, loss of channel maintenance functions, reduced aquatic habitat availability and life history adaptation. If Reclamation determines there is potential for ecologically significant hydrologic impacts, the following information may be useful to identify associated impacts to resident fish species and invertebrate assemblages, including: o Any available baseline data regarding functional species composition, diversity, evenness, abundance, and, for macroinvertebrates, % EPT and some characterization of flow preference. The EPA's rapid bioassessment protocol, or a state-specific method, may be used to describe baseline habitat quality; o Characterization of predicted shifts in species composition, impacts to less tolerant species, and changes in functional composition between current baseline and postproject environment; o Impacts to physical habitat, including availability, heterogeneity, connectivity, and long-term

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					habitat maintenance;• A description of mitigation measures for potentially adverse impacts to stream resources and aquatic life.
Wasco,	Melanie	927	944	Water Resources	Should the project modify flow through operational changes, increased diversion of water, or introduction of new water sources, we recommend the Draft EIS include an analysis of water quality that evaluates the following areas:Compare current water quality, post-project water quality, and the applicable NPDES or Utah water quality standards;If the EIS identifies the potential for the project to cause or contribute to violations of water quality standards, it will be important to identify alternatives, mitigation or operational controls to avoid such impacts. If it proves difficult to determine the project's potential for impacts to water quality standards, we recommend implementing a water quality monitoring program using the Utah Department of Environmental Quality methods for relevant parameters. In such cases, monitoring should be done before, during and after project implementation to ensure compliance with the Utah water quality standards and determine water quality-based effluent limits;Account for changes in background water quality for water quality modeling and when making determinations of assimilative capacity;Identify reaches with existing water quality impairments per State CW A Section 303(d) lists, draft or established total maximum daily loads (TMDLs), and potentially affected dischargers and ensure the project will avoid contributing to existing impairments;o To identify impaired waterbody segments within the affected area, the Utah 2016 Integrated 305(b) Report and 303(d) List can be found at https://deq.utah.gov/legacy/programs/water-quality/monitoringreporting/assessment/2016-integrated-report.htm ;o Source Water Protection areas and explanation of how the project will be consistent with Source Water Protection planning measures;
Wasco,	Melanie	927	946	Water Resources	Identify potentially affected drinking water treatment providers with intakes on reaches with predicted water quality changes as well as possible changes to treatment processes; andIdentify waste water treatment plants discharging to reaches with predicted water quality changes. Evaluate current and post-project water quality at a

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					critical flow conditions and expected changes to assimilative capacity or permit limits for any NPDES or Utah Department of Environmental Quality discharge permits.
Wasco,	Melanie	927	947	Water Resources	If the irrigation in the project area will increase as a result of this project, we recommend the Draft EIS consider whether there will be water quality effects related to return flows in receiving waters, and any associated impacts to water treatment facilities and discharge permittees.
Wasco,	Melanie	927	949	Water Resources	We recommend considering the following stormwater management and monitoring practices to avoid and minimize impacts to water quality:• Site-specific stormwater management plans for all stream and wetland crossings to ensure careful consideration is given to uniquely sensitive environments;• Applicable Best Management Practices during construction, including the use of waterbars, compost filter socks, silt fences and diversion dikes or ditches;• Timely inspection and maintenance of erosion and sediment control measures following rainstorms to stop sediment releases and repair the controls; and• For any stream crossings in areas with resources sensitive to sediment loads, water quality monitoring stations should be installed upstream and downstream of those crossings. They should be installed with as much time prior to construction as possible to establish baseline conditions and natural variation in stream conditions.
Wasco,	Melanie	927	950	Water Resources	GroundwaterWe would anticipate this project has the potential to both positively and negatively impact groundwater resources. In assessing the potential impacts of each alternative on groundwater systems in the project area, we recommend that the Draft EIS examine the potential for changes in the volume, storage, flow and quality of ground water using available characterization of ground water resources and ground water use. Projected construction, operation or maintenance of a project may have significant impact on these facets of the natural system mentioned above. If the EIS identifies any adverse impacts to groundwater resources, we recommend considering alternatives, mitigation measures or operational controls that would avoid, reduce or minimize impacts on groundwater.

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Wasco,	Melanie	927	951	Air Quality	We recommend evaluating and disclosing current air quality conditions, identify any potential air quality impacts and, if necessary, detail mitigation steps that will be taken to minimize associated adverse impacts. We recommend that consideration be given to opportunities to reduce vehicle emissions by limiting unnecessary vehicle idling, as well as minimizing road and construction
Wasco,	Melanie	927	952	Air Quality	related fugitive dust emissions (as appropriate) through the application of best management practices such as dust suppression practices. Components to be presented in the Draft EIS documentation include the existing air quality conditions in the project vicinity, both in Arizona and Utah, and an assessment of any impacts on National Ambient Air Quality Standards (NAAQS), Prevention of Significant Deterioration standards, air quality related values (AQRVs), and an assessment of any Class 1 Areas in the vicinity that may be impacted by construction or operation emissions. We understand that Kane County and Washington County in Utah are both currently in attainment for all six ambient air quality NAAQS (see 40 CFR 81.345), and therefore both Transportation Conformity (40 CFR 93, Subpart A) and General Conformity (40 CFR 93, Subpart B) do not apply. In coordination with EPA's Region 9 Office, we have confirmed that Coconino and Mohave counties in northern Arizona are also in attainment for all six ambient air quality NAAQS (see 40 CFR 81.303). Similarly, both Transportation Conformity (40 CFR 93, Subpart A) and General Conformity (40 CFR 93, Subpart B) do not apply.
Wasco,	Melanie	927	955	Mitigation	The EPA recommends that each alternative in the Draft EIS identify available mitigation where impacts are expected. Where Reclamation identifies the potential for significant water or air quality impacts, we recommend monitoring and modeling efforts are considered for accurately assessing current conditions, predicting project impacts, and ultimately supporting adequate mitigation planning and implementation of effective mitigation. The higher the uncertainty is surrounding project impacts, the more emphasis there should be on providing mitigation details to assure protection of aquatic resources. Where the EIS commits to mitigation, we recommend specifying the entity responsible for implementing the mitigation and a schedule for when the mitigation will be applied. If the project includes mitigation intended to avoid impacts to regulatory thresholds, we recommend including the following

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					additional information in the Draft EIS:• A defined mitigation monitoring plan to track the effectiveness of the mitigation, including baseline monitoring if data are lacking;• Specific management decision points based upon protecting the minimum desired environmental conditions (thresholds) in the project area, which would trigger action;• Management alternatives and mitigation measures that would be implemented should a threshold be exceeded;• Identification of short and long-term financial assurances;• Mechanisms for public disclosure of the analysis and management decisions; and• Specific temporal milestones to meet rehabilitation standards.We emphasize the importance of the Draft EIS including details on mitigation measures for any impacted resource, especially effects related to water quality, wetlands, stream morphology and aquatic life impacts. Also, ensure that any mitigation details presented are consistent with the 2008 Rule on Compensatory Mitigation for Losses to Aquatic Resources for CW A Section 404 related impacts.
Wasco,	Melanie	927	957	Special Status Species	The project area may contain special status species, including Endangered Species Act listed threatened species and endangered species, as well as candidate species. The EPA recommends engaging the U.S. Fish and Wildlife Service (FWS) as early in the analysis as possible to assure that the proposed alternatives account for the following:• River restoration, flow and channel modifications, wetlands, and habitat fragmentation regarding species' habitat requirements;• Migratory Bird Treaty Act compliance; and• Protection from invasive species.
Wasco,	Melanie	927	958	Aquatic Invasive Species	The EPA recommends that the Draft EIS analyze the project's potential to increase the spread of invasive species by means of pipeline transmission to the receiving basin, or streams along the proposed alignment such as Kanab Creek and the Paria River in the event of a leak or spill. We recommend that the Draft EIS specifically consider quagga mussels (<i>Dreissena bugensis</i>) and provide details on any measures that would be implemented to prevent the project from spreading invasive species.
Wasco,	Melanie	927	960	Native American Concerns	There are currently two pipeline alignments proposed, the Southern Alternative and the Highway Alternative, which begin and end in the same location. The Southern Alternative would travel south of the Kaibab Indian Reservation while the Highway Alternative alignment may cross Tribal trust lands, which EPA understands require

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					the Bureau of Land Management and the Bureau of Indian Affairs to issue Right of Way grants and require a tribal resolution from the Kaibab Band of Paiute Indians. We understand that Reclamation is reinitiating government to government tribal consultation with Indian tribes, as well as consultation under section 106 of the National Historic Preservation Act. If the project area is located in a potential Environmental Justice area, the Draft EIS is required to address whether any minority or economically-disadvantaged communities will be disproportionately and adversely affected by the project. The 2016 Report, Promising Practices for EJ Methodologies in NEPA Reviews, may be helpful and can be found at https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf .
gg	collins	928	963	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to the Lake Powell Pipeline. I am opposed to the money already spent to further it without proper public input. This is my taxpayer monies which I feel has not been properly spent in this case. Pls register my opposition.
Evan	Vickers	929	969	Opinion - For Proposed Lake Powell Pipeline	As a lifelong resident of southern Utah, I know first -hand the unique needs of our area. I've raised my family here, I've built successful businesses here, and I've served as an elected official for more than two decades. I have studied the options to secure water for our rapidly growing population and economy and have concluded that additional conservation, reuse and the Lake Powell Pipeline (LPP) are all essential for our future. Southern Utah is one of the fastest -growing regions in the nation and additional water is needed. In addition, a more reliable water source is needed and there isn't a more dependable source in the western United States than the Colorado River. Utah owns rights to the water and should develop and use them for the benefit of the state. The water from the project will support our future generations and businesses, providing employment and opportunities for economic growth and diversity. Another benefit of the LPP is that it preserves flows for nearly 400 river miles, providing tremendous environmental benefits. I have a long history of evaluating the value of the LPP project. I served on the Cedar City Council from 1987 to 1999 during which time we were evaluating the value of bringing additional water to our basin as well as to Washington County. The LPP will bring water to

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					Washington and Kane Counties that will benefit many people long after we are gone. As the current Utah State Senate majority leader, I acknowledge the ongoing support of legislators for this project. Legislators must look at the resources and infrastructure needed to support our quality of life, health, safety, and economy. It is our duty and responsibility to prepare for the future and we take this role seriously. That is why we support the Lake Powell Pipeline. Thank you for your efforts to move this project forward for the benefit of Utah.
David	Orr	930	972	Opinion - Opposed to Proposed Lake Powell Pipeline	The pipeline is clearly not needed. It is much too expensive and will reward high consumption rates of water by the St. George community which already has high per capita usage. Furthermore, the future of the Lake Powell water supply is in serious doubt, as the long term trends in water storage are declining and show little likelihood of returning to a "normal" storage capacity level. Climate change is causing a reduction of the Colorado River's flows due to reduced snow levels and rainfall in the upper basin. The recent wet year appears to be an outlier. St. George needs to plan for a dry future instead of banking on a pipeline that will not be a long term sustainable source of water.
Elaine	Tyler	931	985	Opinion - Opposed to Proposed Lake Powell Pipeline	I am strongly opposed to the request by the Utah Board of Water Resources to build the Lake Powell Pipeline on the Colorado River!
Mac	Nelson	932	1014	Opinion - Opposed to Proposed Lake Powell Pipeline	I am perplexed to see that this proposal has made it to this point. The project is a boondoggle. The only people who will ever benefit from the Lake Powell Pipeline are developers (most from outside the affected area) and politicians. Reality is that assuming we are faced with future drought conditions, the Colorado River is over - allocated now, and as new allocation occurs the State of California will, as in the past, determine that they can buy the politicians more cheaply than buying the water. Utah and Arizona will be left holding the bag. It is incredible that this project is viewed by Utah politicians as the only solution to our needs for water to support future growth. There has been very little effort by those same politicians to support any reasonable effort to implement water conservation efforts similar to other drought locations in

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					California, Nevada, and Arizona. In Southern Utah we continue to develop neighborhoods with a pool in every yard, large lawns, and water parks. In addition, after years of study, I am very concerned that cost estimates for the project, and the method of paying for the project are frankly unbelievable and probably intentionally distorted in order to sell the project to the public. This project should not proceed without a full independent audit of cost estimates and a clear public understanding of how that cost will be recovered. I urge you to put this project on hold at least until the above concerns have been properly addressed. Thank you for your consideration of my views.
Bruce	Bayles	933	1027	Opinion - Opposed to Proposed Lake Powell Pipeline	I am apposed to the Lake Powell Pipeline project. Much of the area in Kane and Washington Counties is desert region with very limited water resources. Yet this does not seem to be factored into the real estate growth and development being planned for this area. There are two key issues that I would like to request in the scoping process: 1. The local County and/or City Councils that approve growth and development expansion should be legally required to evaluate currently available water resources and when these EXISTING resources are at or near the maximum available, they should not approve any additional expanded development requests. Utah is the 2nd driest state in the nation, and this fact must be considered and limit the amount of new development especially in dry, desert areas that were never meant to be inhabited. 2. If this project goes forward, any cost and expense to provide additional water resources to new developments in these areas must be fully and solely paid for by the developers and new residents of the new approved developments.
Paul	L'heureux	935	1033	Visual Resources	My name is Terry Johnson and my address is: 2790s 3560w, Hurricane, UT, 84737. I am sending this e-mail in regards to the power line that is supposed to run through the Dixie Springs neighborhood and connect to a power station at Sand Hollow Reservoir. This power line would run up 3400w and the steel poles would be in the yards of the homes on 3400w. I feel that this would be a huge intrusion into our community both visually and would grossly affect property values. There is also the safety consideration of living in close proximity to high voltage power lines. Please consider another route for these power lines. Thank you.

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Steve	Mare	936	1040	Opinion - Opposed to Proposed Lake Powell Pipeline	NO PIPELINE! STOP THE NONSENSE NOW! RON THOMPSON AND HIS CREW OF GOOD OLD BOYS ARE GETTING RICHER AND RICHER AND RAPING THE UTAH TAXPAYERS WITH HIS IDIOTIC PROJECT! THERE WILL BE NO WATER LEFT IN LAKE POWELL BY THE TIME A DECISION IS MADE. TEACH PEOPLE TO CONSERVE WATER IN SOUTHERN UTAH AND MAKE IT MISERABLE FOR PEOPLE THAT DON'T CONSERVE WATER. WHY IS IT THAT EVERY MORMON CHURCH IS SURROUNDED BY LAWN THAT HAS TO BE WATERED? WE HAVE ALREADY SPENT MILLIONS (BILLIONS?) OF DOLLARS AND WE STILL DON'T HAVE A PLAN. IS THIS HOW YOU WOULD RUN A LEGITIMATE BUSINESS? THOMPSON IS OUT TO HELP HIMSELF, NOT THE REAL PEOPLE IN SOUTHERN UTAH.
Paul	L'heureux	938	1042	Visual Resources	My name is Paul L'Heureux and I am a homeowner in Dixie Springs, the neighborhood just north of Sand Hollow Reservoir. My wife and I attended the meeting on the Lake Powell Pipeline Project at the Dixie Center on Wednesday, Jan. 8, 2020. For the record, I have no problem with the proposed pipeline from Lake Powell to Sand Hollow. I am writing to express my concern over a proposed power line which would run down 3400w in Dixie Springs. The easement for this power line would put large steel power poles in the yards of people living on 3400w. Though my family does not live on 3400w, I feel that this power line would be detrimental to the health and safety of the people of Dixie Springs. It would also create an eyesore and destroy the views of the local mountains and sky. It would also adversely affect the property values of the homeowners in this community. I respectfully request that another route be found for the aforementioned power line. Thank you for your time and my information is below.
Alice	Newberry	939	1045	Alternatives	A water conservation alternative should be added to the current study. The Western Resource Advocates' "Local Waters Alternative" spells out a comprehensive approach to provide Washington County's water needs through the year 2060. Water conservation and reuse of gray water for landscaping uses (as an example) plus analysis of management of our ground water and capture of storm water are other important components of water management.

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Alice	Newberry	939	1048	General	The LPP is a risky and expensive approach to providing water to Southwest Utah. Just a few of the issues include: the holders of senior water rights to the Colorado River may use all the water available from Lake Powell with likely declining water flows as climate change occurs; there needs to be clear evidence that projections of water available will meet the LPP needs. Also, there needs to be legal proof that the LPP can obtain these water rights. It seems in opposition to the Colorado River 1922 Water Compact, which disallows moving water from the Colorado River's Upper Basin for use in the Lower Basin. Another major concern with this project is the cost, which has never been clearly delineated. The LPP was originally proposed more than ten years ago, and of course costs have risen and continue to rise as time goes on. The federal analysis which is just beginning promises to be long and rigorous; the Utah Governor created an Executive Finance Water Board in 2017 to review financial concerns. The LPP keeps moving into the future, and personal water use continues to drop. If and when the LPP is built and whether or not it is functional, who will pay for it? An additional tax burden on our citizens is unnecessary and may be intolerable.
James	Bily	940	1061	Areas of Critical Environmental Concern (ACEC)	The pipeline will cross Areas of Critical Environmental Concern. Those areas were established because of their unique resources and those resources have not gone away just because someone wants to build a pipeline. In order to overturn the protections of the ACECs, I believe that the value gained must be substantial, provable and not attainable in any other practical way. I believe the pipeline flunks those tests.
James	Bily	940	1064	Alternatives	Is there a water conservation alternative to the LPP? Washington County has one of the highest average gallons used per capita in the area. Even a 25 decrease achieved already and a proposed further 20% reduction will not bring us close to the leading municipalities in the SW.
James	Bily	940	1066	Water Supply	Is there going to be sufficient water in the Colorado River to meet the current and projected needs of those relying on it? Will the proposed pipeline be pumping sand instead of water? I believe the overwhelming majority of scientists of all nations and political leanings who say the climate is changing and that continued drought in our

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					area is probable. If there is insufficient water in the River, the environmental costs of the pipeline will have been wasted.
Jen	Blue	941	1068	Opinion - Opposed to Proposed Lake Powell Pipeline	I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway. The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit. Washington and Kane counties are some of the largest per capita water users in the country. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region. The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption. For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward.
Cheryl	Anderson	942	1070	Opinion - Opposed to Proposed Lake Powell Pipeline	I am not in favor of the pipeline. I do not think that the cost is worth the benefit. It is too expensive for residents to pay for it and the water is not adequate in Lake Powell. I believe that there are other underwater sources like Gunlock and the aquifer in Milford which are closer to Washington County. I believe it would be cheaper to treat the underwater sources than pipe it 120 miles. I also believe that it should be taken from the closest point to Washington County, perhaps upriver from Lake Powell if it is built to reduce the cost. The residents of Washington County do not make enough money to afford the increase in water prices. Also, more reservoirs can be built to trap the water in our area. I am a resident of St George and may have to move elsewhere if this pipeline is built to afford water.

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ryan	metzger	943	1072	Opinion - Opposed to Proposed Lake Powell Pipeline	Please accept these comments in response to the Bureau of Reclamation's Notice of Intent to prepare a draft environmental impact statement and public scoping period for the Lake Powell Pipeline Project. I urge the Bureau to to cancel the Lake Powell Pipeline Project, and encourage all stakeholders to pursue alternative means to ensure future water security for Washington County, Utah. The analyses conducted thus far regarding the need for this pipeline are deeply flawed, and the impact of water loss to the Colorado river as a result of the pipeline will be substantial to both the environment and those living in the Southwest. Moreover, I believe it is the responsibility of the Bureau, as much as any other entity, to help move this country away from the harmful, 19th century practices of water acquisition and dam building to more modern, sensible practices which center on water conservation, fair pricing of water use, and preservation of riparian habitats. I implore you to ensure any environmental review of the LPP project addresses thoroughly, AND FAIRLY, such alternative measures to ensuring water security.
Sabine	Weil	944	1074	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to let you know that I strongly oppose constructing the Lake Powell Pipeline to provide more water to St. George and Washington County, Utah. The first step for Washington County is to follow in the footsteps of Las Vegas and promote water conservation --not continued wasteful use of this very precious resource. Please do not permit this selfish project. Thank you.
Jim	Dreyfous	945	1076	Opinion - Opposed to Proposed Lake Powell Pipeline	I do not understand why this is still being discussed! The Colorado is over allocated now and going forward with less water predicted in the Colorado drainage this pipeline can not be a viable project. Maybe you consider this project if a like amount of allocated water somewhere in Utah is reduced by a like amount. Please consider alternatives before even considering this project. Water is a precious resource; let's not waste it
David	Farnsworth	946	1077	Opinion - Opposed to Proposed Lake Powell Pipeline	I am a resident of Washington County. Besides the concern that a significant impact to the environment will occur and that it is likely that the water that is supposed to be diverted may not even be there when the line is completed, cost is a significant and major concern. We are told that the line will allow water for future development in Washington county, but that the costs of the project will be covered by increased

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					water costs for everyone, not just those who will benefit from the future development. If the benefit is for the future, the total cost should be born by those future beneficiaries, not by those of us already there who don't need or want that development. We are to pay for something that for us is a detriment, not a benefit.
Johnny	Giles	947	1081	Opinion - Opposed to Proposed Lake Powell Pipeline	The LPP should not be built for many reasons. The most important being it is not needed. Washington county uses a lot of water compared to other areas in the southwest. If people would just conserve and cities would make more yard (water wise) decisions it would not be necessary. Although \$1100.00 per person does not seem like a lot of money, at the cost of \$186 million and 175,000 people in the county, it will be a big burden and an even larger one for the maintenance. Impact fees in St. George are already the highest in the state. There is no guarantee that Lake Powell will even have the water to provide for it. The Army Corp of Engineers and the BOR both state that there is already more water allocated in the river than what is available. The Colorado River is not even sustainable at it's current rate, let alone at the project's proposed rate. Quagga mussels will certainly be introduced into the area causing millions of dollars to the environment and the pipeline itself. Also, Governor Herbert's executive water finance board determined that it would take money away from other programs. In conclusion, this does not seem like a worthwhile venture except for the people constructing it. Contractors already have a hard time finding employees as it is. Sent from my iPad
Sarah	Stock	948	1116	NEPA Process	We urge Reclamation to put completion of this EIS on hold until crucial agreements and other governmental actions are completed that will significantly clarify the amount of water available for the Lake Powell Pipeline and Green River Block Water Rights Exchange Contract. These critical agreements and actions include the Ute Water 14 Compact and the re-consultation of the 2007 Interim Guidelines, as well as preparation of a Programmatic EIS done on the newly signed Upper Basin Drought Contingency Plan (Section 3.G., Section 3.C, Section 3.D.). The Hydrological Determination completed by Reclamation in 2007 is no longer relevant to the Upper Basin States and must be revised using time dependent, forward-looking data in order to understand Upper Basin water availability (Section 3.A.). NEPA requires a

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					programmatic EIS on the Upper Basin Drought Contingency Plan (DCP), specifically the Drought Response Operations of Upper Basin Reservoirs, before this EIS can be completed (Section 3.C). Re-consultation of 2007 Interim Guidelines will begin by 2021 and will very likely affect the 50-year feasibility of the LPP Project (Section 3.D).
Sarah	Stock	948	1119	NEPA Process	The EIS should be put on hold until it can be determined that Utah has the rights to sufficient water in tributaries to be the subject of an exchange, and that those rights are tied to actual wet water (Section 3.F.). This EIS must be put on hold until the pre-compact Federal Reserved Water Rights claims of the Tribes in Utah are settled (Section 3.G.).
Sarah	Stock	948	1122	Climate Change and GHGs	Climate change and continued aridification of the Colorado River Basin must be analyzed in the EIS as it relates to current and future water supply (Section 3.A., Section 3.B).
Sarah	Stock	948	1127	Water Supply	The EIS must not rely solely on the Record of Decision on Flaming Gorge Dam Operations in 2006 to assess water availability for the LPP Project (Section 3.A.)
Sarah	Stock	948	1129	Cumulative Impacts	The cumulative effects of all proposed and yet undeveloped Upper Basin depletions, including the LPP Project, need to be modeled and evaluated in this EIS (Section 3.B).
Sarah	Stock	948	1131	Water Law	The State of Utah has vastly over-appropriated water rights to the Colorado River, putting water users in jeopardy (Section 3.E.).
Sarah	Stock	948	1132	Water Supply	Because the consumptive use of water for the Lake Powell Pipeline will put current water users with junior water rights in jeopardy of losing their water rights, given ongoing aridification, the EIS must analyze the economic and cultural impact that a Compact Call or a curtailment, made necessary as a result of the water depletion effects of the LPP Project would have on other water users in Utah's Colorado River Basin (Section 3.E.).

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Sarah	Stock	948	1133	Water Resources	The EIS should require an in-depth look at tributary flows into the Green River to determine how they may be impacted by climate change and over-appropriation (Section 3.F.).
Sarah	Stock	948	1138	Water Law	Reclamation must clarify whether releases from Flaming Gorge Dam, in the Upper Basin Division, and conveyed to Washington County, Utah, which is in the Lower Basin, is an appropriate use under the 1922 Colorado River Compact and associated Law of the River (Section 3.H.).
Sarah	Stock	948	1139	Alternatives	The EIS should fully explore alternatives to the Lake Powell Pipeline Project, including conservation and alternative sources of water in the region that could obviate the need for the Project (Section 3.I.).
Sarah	Stock	948	1141	Other	The Project budget must outline the costs and/or impact of treating Colorado River water, or diluting Colorado River water with local groundwater, and upgrading municipal plumbing systems to deal with introducing chemically unique Colorado River water into the public utility lines in Washington County (Section 3.J.).
Sarah	Stock	948	1142	Aquatic Invasive Species	The mitigation of invasive quagga mussels that have infested Lake Powell must be assessed for the entire conveyance system, and return flows to Lake Mead via the Virgin River, including the economic impacts of this problem (Section 3.K.).
Sarah	Stock	948	1144	Native American Concerns	The EIS must fully evaluate the two alternative pipeline routes, in consultation with the Kaibab Paiute Tribe, to identify a route that would not impact sacred sites, burials and other cultural values (Section 3.L.).
Sarah	Stock	948	1148	Visual Resources	EIS must examine impacts to aesthetic values for residents near Sand Hollow Reservoir (Section 3.N.).
Sarah	Stock	948	1149	Water Resources	The EIS must analyze the impact that use of Project water would have on hydropower production at Glen Canyon Dam (Section 3.O.).
Sarah	Stock	948	1150	Water Resources	The EIS should examine the effects of changes to downstream water quality as reservoir levels at Lake Powell approach the top of the inactive pool and result in the remobilization of stored sediment deposits in the upper reaches of Lake Powell (Section 3.P.).

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Sarah	Stock	948	1153	T&E Species	The EIS must address impacts of the LPP Project and associated water withdrawal on Colorado River health and endangered species. This would include the ecosystem of the Virgin River (Section 3.P.).
Sarah	Stock	948	1154	Other	The State of Utah needs to clarify how much interest will be required for the financing of loans for the LPP Project before we can understand the financial feasibility of the Project and if it is in the public's best interest (Section 3.Q.).
Sarah	Stock	948	1155	Other	Reclamation should require UBWR to develop a more accurate and complete project budget and submit it to the public for review (Section 3.Q.)
Sarah	Stock	948	1158	Water Resources	? The EIS must use modeling that takes climate change into account. Models that are based on the last 100-years of records are not adequate for this. Models should instead be based off relevant peer-reviewed science about current and future climate impacts in the Colorado River Basin and include the "stress test" hydrology described in Section 3.B.23? The EIS must not rely solely on the Record of Decision on Flaming Gorge Dam Operations in 2006 to assess water availability for the LPP Project. Similar modeling used to develop the 2007 Interim Guidelines has completely failed to predict the current
Sarah	Stock	948	1160	Water Resources	risk for shortages we face in Lakes Mead and Powell, leading to the need to develop emergency DCPs in both basins that will likely impact dam operations basin-wide.? The Hydrological Determination completed by Reclamation in 2007 is no longer relevant to the Upper Basin States and must be revised using forward-looking data in order to understand the impact that the Project will have on basin-wide water availability. ²⁴
Sarah	Stock	948	1183	Cumulative Impacts	Specific recommendations for the scope of this EIS related to the evaluation of the cumulative effects of potential basin wide water depletion and water scarcity connected with the LPP Project: ? The EIS must analyze the possibility of a Compact Call with full buildout of proposed Upper Basin water projects and the effect this would have on the communities that will become dependent on the LPP Project, should it be approved. For example, it should analyze the effect on the repayment schedule for the construction of the Project if full water capacity is not available for

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					the Lake Powell Pipeline (more detail in Section 3.Q).? The EIS must analyze the impact that a Compact Call would have on other communities and economies in the Upper Basin.? Specific recommendations on EIS scope relating to reduced reservoir levels and impacts on water quality, power generation, and endangered species resulting from the Project's cumulative water depletion impacts are found in detail in subsequent sections (Section 3.O. and Section 3.P.).
Sarah	Stock	948	1186	Water Supply	Reclamation should include analysis of 32 coordinated dam operations in the EIS modeling in order to determine whether there will be sufficient hydrology for releases from Flaming Gorge Dam to fulfill Utah's Ultimate Phase water rights and also be able to keep Lake Powell reservoir levels up.
Sarah	Stock	948	1195	NEPA Process	The Upper Basin DCP and the Lower Basin DCP be the subject of a basin-wide PEIS.? The basin-wide PEIS include consultation with an independent science panel that is involved from the very beginning of the process and that the National Academy of Sciences review and approve the PEIS.? All of these steps be taken before preparing the EIS for the LPP Project since a complete understanding of the DCP is needed to model likely future scenarios regarding Flaming Gorge Reservoir and Lake Powell.
Sarah	Stock	948	1199	Other	An agreement resulting from the re-consultation of the Interim Guidelines is necessary to safeguard critical habitat for endangered species and the water supply of nearly 40 million people. This negotiation process should be open to stakeholders across the basin, including the public. We request that the re-consultation of the Interim Guidelines allow for full and meaningful public participation. It is important that this agreement on Colorado River operations be completed before permitting the LPP Project and other large depletions in the Upper Basin. We need to understand where we stand with future water supply in order to weigh the cost/benefit ratio of investing billions in new water projects.
Sarah	Stock	948	1201	Other	The water rights for the Lake Powell Pipeline Block were all supposed to expire on Oct. 9th, 2009 if not put to beneficial use. The State of Utah allowed extensions beyond that time. Reclamation's Area Manager for the Provo Area Office, Bruce Barrett, lodged several protests to water rights from this block. In a protest letter to

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					the Utah Division of Water Rights he states, “After the “Ultimate Phase” was deauthorized, Reclamation assigned this portion of the appropriation to the UBWR with the understanding that any portion of this water right not developed within 50-years of the original approval date (ending on October 6, 2009) would lapse.” ⁴⁰ Because of the substantial over-allocation of both Utah’s water rights, and the water rights of the Colorado River Basin as a whole, the junior status of the Lake Powell Pipeline water rights leaves the Project in danger of being impacted by future drought contingency measures and re-consultation of the 2007 Interim Guidelines, which will be finalized in December of 2025. More discussion follows, in Section 3.Q, about the need to evaluate the costs associated with implementing a demand management program, partially because of LPP Project withdrawals, in the Upper Basin. Also because of the over-appropriated nature of water rights in Utah, use of water for the Lake Powell Pipeline will put current water users in jeopardy of losing their more junior water rights with ongoing drought. The EIS should analyze and include the economic and cultural impact that a Compact Call or a curtailment would have on other water users in Utah’s Colorado River Basin who have junior water rights to the Lake Powell Pipeline, but who have already become reliant on the water.
Sarah	Stock	948	1204	Water Law	EIS must scrutinize the “exchange” concept outlined in the Draft Contract for Exchange of Water for the Lake Powell Pipeline. The State of Utah is prepared to sign an Exchange Contract with Reclamation for the release of 86,249 AFY of water from Flaming Gorge to be withdrawn at Lake Powell. The exchange ⁴¹ contract has not been fully outlined and therefore it is difficult to review. In a draft contract from early in 2018, it states, “On an annual basis, the direct flows that will be left in the river and used to meet ESA requirements will equal the [Flaming Gorge] project releases used for depletion by the State under the Assigned Water Right.” ⁴² Nowhere does the exchange contract outline or describe the method of measuring and accounting the “direct flows” left in the river in order to equate those to the releases from Flaming Gorge Dam. We believe the project documents for the Lake Powell Pipeline need to include the details of this exchange. There would be costs associated with monitoring and accounting that also need to be included in the economic analysis. We request that Reclamation and the UBWR provide more information on the mechanism of

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					accounting for this water rights exchange. The EIS should require an in-depth look at tributary flows on the Green River in Utah to verify if such an exchange is even possible along side the settling of the Ute Water Compact and the Green River Block Exchange Contract of 72,641 AFY. The EIS should incorporate detailed analysis of these tributary flows (Price, Duchesne, 43 Yampa, Muddy, San Rafael, White, Duchesne, Price, San Rafael, Dirty Devil, and Escalante rivers) and how they and the ecosystems they support may be impacted by climate change and this appropriation in the coming years.
Sarah	Stock	948	1206	Native American Concerns	Under the Winter's Doctrine, the Northern Ute and Navajo Tribes have federal reserved water rights, dating back to the creation of the reservations, which have yet to be fully developed. The particular water rights assigned to the Ute Indian Unit of the Ultimate Phase were intended to go to the Northern Ute tribe. When that project never materialized, the Tribe settled with the federal government for the promise of future water rights. Thus far, a water contact has not been
Sarah	Stock	948	1210	Native American Concerns	agreed upon and full water rights have not been assigned to the Ute tribe. The Navajo Tribe is also awaiting Congressional ratification of a water rights settlement that would let them utilize 81,500 acre-feet of water annually.
Sarah	Stock	948	1211	Water Supply	We recognize a legal controversy amongst Colorado River users and stakeholders that releases from Flaming Gorge Dam, in the Upper Basin Division, and conveyed by pipeline to Washington County, Utah, in the Lower Basin, may not be an appropriate use under the 1922 Compact. Reclamation's clarification on this matter is necessary.
Sarah	Stock	948	1215	Purpose and Need	UBWR has not adequately proven the purpose and need for the Lake Powell Pipeline. EIS must fully examine alternative water supplies and conservation
Sarah	Stock	948	1217	Hazardous Materials	The EIS must address the impact of introducing chemically unique Colorado River water into the public utility lines in Washington County.
Sarah	Stock	948	1222	Aquatic Invasive Species	The EIS should examine the spread of invasive Quagga Mussels and the Impact on Fish and Wildlife In 2012, larvae, or veligers, of the invasive quagga mussel (<i>Dreissena rostriformis bugensis</i>) were found in Lake Powell. By 2013, adults had been detected, and by 2017 the lake shore, canyon walls, and the control gate of the

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					Glen Canyon Dam were covered with layers of thousands and thousands of adults. The adult mussels adhere to hard surfaces, causing 56 physical blockages in fish screens, water intakes, pipes, tanks, and other drinking water infrastructure. By creating a buildup of sharp, smelly objects on docks and shorelines, the mussels also cause a significant decrease in the recreation experience. Quagga mussels also have an impact on the environment, fish, and wildlife by altering the ecological food web and water quality. “Infestation of source water bodies by dreissenid mussels can negatively affect water supply, water quality, and food web ecology within these systems. Heavy mussel infestations occasionally create conditions that promote blue-green algae blooms and negatively affect recreational fisheries and water treatment facilities that depend on these source waters.” ⁵⁷ We are very concerned that if the LPP Project is constructed, it will lead to quagga mussel infestation in Sand Hollow Reservoir. The National Park Service states, “It is crucial to keep the mussels from moving from Lake Powell to other lakes and rivers.” The mussels could spread if 58 any veligers survive transport through the pipeline. The applicant refers to chemical treatment stations as a way to mitigate this, but other entities trying to control mussel infestation in water treatment plants have had to use a multi-pronged effort including mechanical scrubbing and chemical treatments to keep water plants functional. We do not believe the chemical treatment ⁵⁹ of veligers in the boosting stations will be enough to ensure that quagga mussel veligers do not ever enter Sand Hollow Reservoir and establish a colony. In addition, the chemical treatment of mussels can put toxic byproducts into drinking water
Sarah	Stock	948	1223	Aquatic Invasive Species	causing difficulties in water treatment plants. Continuous chemical treatment for invasive quagga mussel veligers could lead to violations of State Water Quality Standards. “Various chemicals, in particular oxidizing chlorine-based chemicals, have been used to control dreissenid mussels in water infrastructure...[T]hey can adversely affect the water quality of receiving waters (Chakraborti et al. 2013). The formation of disinfection by-products (DBPs) is one of several drawbacks of using oxidizing chemicals such as chlorine. For example, an increase in total organic carbon (TOC) and harmful algal blooms (HABs) mediated by dreissenid mussel activity in source waters may exacerbate DBP levels in the treated water and increase potential

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					<p>complications in treatment processes to eliminate this toxicity. DBP formation depends on TOC levels, water temperature, chlorine, pH, bromide, and contact time. Increased TOC may require altering the water treatment processes in order to meet state and federal regulatory limits for finished water before distribution.”⁶⁰ The applicant completely fails to address this important water quality issue in its application. The additional cost of managing the invasive quagga mussels needs to be considered in the immediate and long term cost of operations for the LPP Project. In 2016, the Journal of American Water Works Association reported the following: “Maintenance of mussels in drinking water infrastructure is not only cumbersome and poses water quality threats that are also expensive. The potential cost for upgrades to 13 hydropower facilities in the Colorado River Basin alone has been estimated to be \$23.6 million, with chemical costs estimated at another \$1.3 million per year.”⁶¹ The estimates mentioned above do not consider the cost of containment paid by the State of Utah or Department of Interior (DOI). In fiscal year 2017, the DOI spent \$8.6 million on quagga mussel containment nationwide. The DOI upped that request to \$11.8 million nationwide in fiscal year 2018. At Lake Powell last year, federal agencies set up and staffed inspection ⁶² checkpoints at docks, decontaminated boats, and led an aggressive public education campaign aimed at boaters. If quagga mussels infested Sand Hollow Reservoir, the state would have to implement a similar program for containing the threat and the cost of this would be significant. The possible impacts that quagga mussel infestation could have on the environment that the EIS should examine include: alteration of the food web, promotion of blue-green algae blooms, changes in water quality, and negative effects on fisheries.</p>
Sarah	Stock	948	1225	Cultural Resources	<p>The EIS should examine the environmental impacts on sensitive areas and cultural sites along the pipeline route. The Kanab Creek Area of Critical Environmental Concern is within the path of the preferred pipeline route. Living Rivers & Colorado Riverkeeper submitted timely comments on the proposal to amend the Bureau of Land Management’s (BLM) Arizona Strip Resource Management Plan (RMP) as part of its evaluation of the proposed Lake Powell Pipeline route in the Kanab Creek Area of Critical Environmental Concern (ACEC) in 2018. The Kanab Creek ⁶³ ACEC is</p>

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					important habitat for Southwestern Willow Flycatchers. The Kanab Creek ACEC was specifically designated “for the protection of endangered SW flycatcher habitat and riparian, scenic, and cultural resources,” according to the Arizona Strip Field Office RMP.64 The applicant requested an amendment to the Kanab Creek ACEC Resource Management Plan in order to allow for the applicant’s preferred pipeline alignment. The Final EIS for the Arizona Strip Field Office Resource Management Plan for the Bureau of Land Management (BLM) states “Designating the Kanab Creek ACEC and following strict management prescriptions associated with that designation would help maintain, possibly improve, water quality in the Kanab Creek area.” The EPA commended the BLM for the designation of the 65 ACEC because of this. Studies have shown that humpback chub and razorback sucker have 66 been documented at the mouth of Kanab Creek in the Grand Canyon, which we too have observed and photographed on river patrols. The EIS should look at the impacts that 67 construction and disturbance upstream in the Kanab Creek ACEC riparian area might have on the sediment, water quality, and endangered species in lower Kanab Creek. Reclamation must consult with the Kaibab Paiute Tribe because their aboriginal culture and heritage extends beyond the sovereign boundaries of their reservation. The UBWR has identified two possible pipeline routes. One route follows the highway corridor rather than going
Sarah	Stock	948	1226	Cultural Resources	through pristine lands. Meaningful consultation with the Tribe is necessary in order to identify a route that would not impair sacred sites, burials and other cultural values. The EIS must 68 evaluate both pipeline alternatives in this NEPA process. It should be noted that the applicant’s preferred alternative, the South Alternative Alignment, is preferred because according to the applicant, it “avoids effects on the Kaibab-Paiute Indian Reservation.” This is concerning and perhaps alarming given that in the last round of 69 comments to FERC, the Kaibab-Paiute Indian Tribe specifically requested that “the EIS must fully and objectively analyze and consider the existing highway alternative,” which would cross 70 the reservation alongside the existing highway. The Tribe’s comments are extensive and detail many issues with the South Alternative Alignment, which crosses the BLM administered Kanab Creek Area of Critical Environmental Concern (ACEC). The No Action Alternative may be the only

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					effective way to protect tribal cultural resources, and therefore should be fully analyzed.
Sarah	Stock	948	1227	Recreation	The route of the pipeline, along with transmission lines, pumping and hydroelectric stations would be located in a uniquely beautiful region of rural Utah. Many who visit this region are driving the highway to experience wonders of the natural world: Bryce Canyon National Park, Zion National Park, Canyonlands National Park, Grand Staircase-Escalante National Monument, and points between. Further industrialization of this scenic corridor will diminish the recreational value of the area and will thereby cause related economic harm.
Sarah	Stock	948	1229	Visual Resources	Numerous residents of the neighborhoods near Sand Hollow Reservoir submitted written comments to FERC detailing complaints about the proposed overhead transmission lines routed through their neighborhoods. These comments cite major concern for changes in quality of life, obstruction of the natural view shed, and concern for diminishing property values because of this impact. It is unclear if these transmission lines are still a part of the proposed Project or not. If so, the EIS should examine these impacts thoroughly, including impacts on property values in the area.
Sarah	Stock	948	1231	Other	Diverting LPP Project water would lower the elevation and water availability at Flaming Gorge Dam. Flaming Gorge Dam is a central component in the Upper Basin DCP, and will be used to safeguard hydropower production by keeping Lake Powell at an operational level. More water being diverted before Glen Canyon Dam will not only increase basin-wide water scarcity, it will also impact water availability for hydropower production at Glen Canyon Dam. St. George fulfills its electric power and energy requirements through, in part, the purchase of federal power and energy generated by the Colorado River Storage Project (CRSP). ⁷¹ The EIS must analyze the increased risk of Lake Powell levels falling below minimum power pool requirements due to the use of Project water and the effect that would have on regional power supply, as well as the economic and social impact that this will have in the region serviced by power from the Glen Canyon Dam.

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Sarah	Stock	948	1232	T&E Species	The impact on Colorado River flows downstream of the diversion for the LPP Project and the associated effects on endangered and threatened species should be examined fully by Reclamation in this EIS. Additionally, the EIS needs to analyze the impacts of decreased flows (due to the Project as well as the cumulative impacts of all proposed projects upstream, and climate change induced flow decline) on river and ecosystem health.
Sarah	Stock	948	1233	Water Resources	The 75 increased, cumulative diversions that would result from approval of the LPP Project would exacerbate salinity problems in the Lower Basin. The EIS should examine this issue fully as it relates to the cost of mitigation, the economic and health impacts on downstream municipal water users and irrigators, and the impact on special aquatic sites and endangered and threatened species.
Sarah	Stock	948	1234	Water Resources	The EIS should also examine the impacts of the mobilization of perched reservoir sediment that happens as reservoir levels diminish in Lake Powell and Flaming Gorge Reservoir. Reservoir sediment contains organic material which when mobilized, can deplete oxygen in the water column of the reservoir and negatively impact the critical habitat below the dams. The mobilized sediment can also liberate toxins and heavy metals into the water column and affect water quality for wildlife and human communities downstream.
Sarah	Stock	948	1235	Other	The State of Utah must first make clear the financial obligations of the WCWCD on loan repayments for the Project in order to fully understand the Project's financial feasibility. The economic estimate described in the permitting documents should also examine the hidden costs associated with dealing with water shortages in the Upper Basin if Washington County becomes reliant on Colorado River water. When shortages occur, Washington County will be in the same predicament as the Front Range of Colorado; they will seek agricultural water rights along the Colorado River to buy and convert to municipal water rights for the Project. Given the likelihood of future water shortages in the State of Utah, this hidden cost should be included in the economic models. It is also likely that in the near future, a demand management scenario will be necessary to keep the Upper Basin in compliance with the Colorado River Compact if the UDWR develops the LPP Project. This program could have

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					great costs associated with it. For example, we can look to the Metropolitan Water District of Southern California’s Palo Verde Land Management, Crop Rotation and Water Supply Program. In 2013 dollars, this program costs between \$4.7 million and \$19.1 million annually to deliver between 25,000 and 118,000 acre-feet of water. In addition to this annual per acre charge, there is roughly \$250,000 in annual administrative costs, as well as a \$73.5 million one-time sign up fee paid to participating farmers and a \$3.3 million
Sarah	Stock	948	1236	Other	environmental documentation and implementation cost. The EIS needs to examine the LPP 81 Project as it relates to increased need for a demand management program in the Upper Basin and the associated costs of such a program.
Brian	Traub	949	863	Alternatives	As part of the scoping period and preparation of the draft Environment Impact Statement (EIS), please do the right thing by exhausting alternatives to the large power poles bisecting the Dixie Springs Community (i.e., burying the power lines; relocating the lines to the west of the Dixie Springs Community). While acknowledging the additional cost to bury the lines for approximately 2 -3 miles, it seems a relatively small increase given the total project cost. Thank you for the opportunity to provide this response/input. I look forward to reviewing the draft EIS.
Pamela	Palmer	950	867	Alternatives	A meaningful and achievable water conservation goal would be for
Pamela	Palmer	950	868	Alternatives	Washington County and local utilities to invest in conservation measures that reduce per capita water use by 1% per year, resulting in Washington County reducing its potable water use to 115 GPCD by 2060. In fact, Washington County already reduced per capita demands by more than 1% per year between 2000 - 2009, but future water plans are much less ambitious .1. Implement conservation -oriented water prices, which keep costs low for all basic water uses and increases with nonessential uses ;2. Meter all water, including culinary and secondary water, so that providers can document and track water use more effectively ;3. Embed water efficiency into existing public spaces and new residential and commercial developments ;4. Implement smart growth principles – such as denser growth patterns – to better prepare for population growth .

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Pamela	Palmer	950	871	Alternatives	Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods. Western Resource Advocates’ “Local Waters Alternative,” is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analyse of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint using common sense measures. It is a better solution than the LPP’s water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty .Evaluate the costs and yields of major conservatio n methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water - wise landscaping, incentives to convert existing properties to water -wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc
Pamela	Palmer	950	872	Climate Change and GHGs	Determine the high -probability of the long -term Colorado River flow for the LP Punder a range of future climate conditions . Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources’s(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP’s water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water .
Pamela	Palmer	950	873	Other	Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents . The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in

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					the disclosure to the public in this EIS . • Reclamation should also consider analyzing in the EIS the following : 5. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates . 6. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned . 7. Interest rates and accumulated totals over the duration of the loa n 8. The impact of the payment methods on water use, and the impact of that on the water supply requirement s 9. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt . 10. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs .
Pamela	Palmer	950	876	Water Law	Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secur e for the long -term . Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water right s use all of Utah's recalculated Colorado River allocation that considers the high probability of long -term Colorado River declining flows .Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LP P. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact .
Pamela	Palmer	950	877	NEPA Process	It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed . This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriatel y
Pamela	Palmer	950	878	Aquatic Invasive Species	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure . The health hazard of putting chemicals in the water at every

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					pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River
Pamela	Palmer	951	886	Alternatives	Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods. Western Resource Advocates’ “Local Waters Alternative,” is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analyse of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint using common sense measures. It is a better solution than the LPP’s water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty .Evaluate the costs and yields of major conservatio n methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water -wise landscaping, incentives to convert existing properties to water -wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc
Pamela	Palmer	951	888	Climate Change and GHGs	Determine the high -probability of the long -term Colorado River flow for the LP Punder a range of future climate conditions . Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources’s(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP’s water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water .

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Pamela	Palmer	951	889	Other	Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents . The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS . • Reclamation should also consider analyzing in the EIS the following : 5. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates . 6. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned . 7. Interest rates and accumulated totals over the duration of the loa n 8. The impact of the payment methods on water use, and the impact of that on the water supply requirements 9. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt . 10. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs .
Pamela	Palmer	951	890	Water Law	Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long -term . Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water rights use all of Utah's recalculated Colorado River allocation that considers the high probability of long -term Colorado River declining flows .Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LP P. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact .
Pamela	Palmer	951	891	Aquatic Invasive Species	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure . The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a

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					very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River
Pamela	Palmer	951	892	NEPA Process	It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed . This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately
Carolyn	Spotts	952	897	Opinion - Opposed to Proposed Lake Powell Pipeline	I suspect that many of those in attendance either oppose the LPP or have serious questions and concerns about it.
James	Westwater	953	898	Opinion - Opposed to Proposed Lake Powell Pipeline	I strongly urge the Bureau of land reclamation to deny this proposed project. Overall I think it would be very harmful to the environment and to the health of people affected.
		954	899	General	I would like to be added to your mailing list: Atshenry54@aol.com
Richard	Spotts	955	901	Water Law	As you know, the legal framework or context for evaluating a federal proposed action is normally described in Chapter 1 of a Draft Environmental Impact Statement (DEIS). This is where the public is informed on how the federal agency has the proper legal authority and discretion to consider not only the proposed action but also a reasonable range of feasible alternatives. In this case, I believe that there are many potential risks associated with a number of LPP related legal uncertainties. For example, I understand that the Colorado River Compact, which granted Utah its water allocation for transfer via the LPP, may limit or prohibit transfers of upper basin water to lower basin uses. For the LPP, Utah would be using upper basin Green River water to serve two Utah counties that appear to be within the lower basin (Virgin River watershed). So there is the obvious question of whether other lower basin states could potentially challenge the LPP water transfer under the Compact. There is also the potential that future reductions in Colorado River water

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					supplies to lower basin uses in California, Nevada, and Arizona could become so extreme that these states demand re -negotiation of the Compact's original (and we now know) unrealistic allocations to the states . In that event, how would Utah's future water needs compete with significant reductions of water for existing needs in these other states with much greater populations and much higher levels of
Richard	Spotts	955	902	Water Law	related economic investment and activity? If "water flows uphill toward money" in the West, how would Utah's two counties fare against Phoenix, Tucson, Las Vegas, and Los Angeles? In addition, I understand that Arizona state law may require that a state permit be granted before water may be exported from the state. Since the LPP would divert and transfer water from Arizona into Utah, is such an Arizona water export or other permit indeed required? If so, what is the likelihood that Arizona would grant it when its users are already suffering from large reductions in Colorado River water, and its citizens generally use water much more responsibly than Washington County? Moreover, in terms of the Compact allocations, how "junior" might Utah's be in terms of any other more "senior" water rights? Please thoroughly research these and other relevant legal risks, and the probability that they may delay or prevent the LPP water transfers, and then accurately describe those risks and probabilities in Chapter I of the DEIS.
Richard	Spotts	955	905	Water Supply	I was very concerned to see a "need" poster at the BOR Saint George scoping meeting that basically used the narrow one advocated by LPP proponents. It said something about the need to bring a "second source" of water to this area. I believe that BOR must use two different purposes and needs in preparing the DEIS. The first one could be the one used by LPP proponents and the Utah applicant. This is the "external" one. The second "internal" one is far more important; it is the one used by BOR to determine which scoping input is relevant and which tendered alternatives may be carried forward for DEIS analysis. This BOR purpose and need must be broad enough to include a wide variety of relevant public scoping input, and to carry forward my recommended "water best practices" alternative (described below) and other feasible alternatives to the LPP. I believe that it would be fundamentally unfair and a NEPA fatal flaw if BOR improperly uses an arbitrarily narrow purpose and need to exclude DEIS analysis of otherwise feasible and appropriate alternatives.

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					Indeed, the actual purpose and need for BOR should be to assist the two counties in ensuring responsible and sustainable use of water, without undue or risky dependence on out-of-watershed sources, so that future appropriate water needs can be reliably met.
Richard	Spotts	955	906	Alternatives	Under NEPA, the alternatives analysis is the "heart" of the whole process. For the LPP, I and many others believe that there are much cheaper and less risky alternatives that should meet future water needs without the LPP. For example, I believe that an alternative consisting of a variety of already-proven-successful water conservation, efficiency, reclamation, and groundwater recharge methods and measures must be fully analyzed in the LPP DEIS, and its environmental, economic, and social effects objectively compared with those of the LPP. This "water best practices" alternative would be a combination of the following: instituting tiered water pricing to reduce demand and punish wasteful use; eliminating the property tax subsidies that undermine the water district's incentive to conserve; instituting an incentives and advertising program (which has been very successful in Las Vegas) to promote a public water conservation ethic, educate on penalties for wasteful water use, and provide financial incentives to convert wasteful lawns into beautiful native xeriscape; adopt and enforce ordinances to require xeriscape landscaping and drip irrigation systems in new developments; acquire livestock grazing permits from willing sellers or pay to fence out cattle in riparian areas so riparian vegetation comes back and beavers can be successfully restored to streams within the Virgin River watershed (beaver dams slow storm run-off, reduce harmful erosion and reservoir sedimentation, and recharge aquifers); install a series of small gabion check dams in highly eroded canyons and ravines in the watershed to slow run-off and increase aquifer recharge (these have proven successful in southern Arizona); and develop groundwater recharge areas that would take reclaimed wastewater and put it into the aquifer where it can later be pumped to the surface (as is already successfully happening in Arizona and perhaps California); and encourage local elected officials to follow the Vision Dixie and Smart Growth principles in making future zoning and land use decisions, as denser developments tend to greatly reduce the demand for water (especially in landscaping) as well as energy. I believe that all of these

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					recommended methods and measures could be rapidly phased in, at relatively little cost compared to the LPP, and they would cumulatively reduce or re - use water to the point that the alleged need for the LPP would "evaporate" (pun intended). I request that this "water best practices" alternative be carried forward for analysis in the DEIS. I am also worried that the LPP proponents may try to influence BOR to put a draconian "straw man" so -called "water conservation" alternative in the DEIS that would be intentionally designed to make the LPP look like
Richard	Spotts	955	907	Alternatives	the better environmental choice. This alternative may claim that the Virgin River would dry up, riparian vegetation would die, and trees and other existing landscaping in Saint George would perish. BOR must not allow such a ridiculous "doom and gloom" alternative to be used in the DEIS. Indeed, any alternative other than the LPP put forward by the LPP proponents should be viewed with suspicion, and subject to rigorous scientific review by neutral experts.
Richard	Spotts	955	910	NEPA Process	The BOR NOI says that all previous scoping input to FERC is moot, and it must be re - submitted now to BOR to be considered in this LPP DEIS. However, I strongly suspect that BOR may allow Utah and other LPP proponents to submit the twenty or more LPP "study reports" that were prepared and submitted to FERC over the past decade or more. If so, this seems unfair, because the LPP proponents can carry forward their "study reports" and other data and analysis to FERC to BOR, but the public must start over and submit all of its information as fresh and new. I believe that if you use anything that LPP proponents previously submitted to FERC, then you should likewise use anything that those members of the public who opposed or have concerns about the LPP submitted to FERC. If this is not done, I believe that this may
Richard	Spotts	955	911	NEPA Process	demonstrate bias by BOR in terms of applying an inconsistent standard for accepting information. In addition, with respect to the many "study reports", if BOR decides to accept them, BOR must independently verify that the data and analysis remains accurate and complete. In many cases, these reports were prepared a decade or longer ago, and much has changed during that decade.

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Richard	Spotts	955	912	Other	As described above, I believe that higher and tiered water rates (along with other necessary methods and measures) should greatly reduce the current and future demand for water. The irony is that, if the LPP is ultimately approved and constructed, the people of Washington and Kane counties would likely be required to pay much higher water rates (and property taxes and impact fees) to cover the 50 - year pay back of the combined LPP debt of principle and interest, now estimated to total around three billion dollars. However, if future prolonged droughts from climate change reduce overall Colorado River flows, and thereby reduce or stop LPP water transfers, how would this reduced water rate money affect the required debt payoff schedule? Would property taxes skyrocket to make up the difference? Would impact fees go up to the point that housing development slows or stops? How too, would this massive debt that all Utahns assume under state law, affect the state's bond rating and ability to pursue other important (and arguably less risky) infrastructure projects? How would implementation of a "water best practices" alternative affect these economic questions? Would that alternative be a safer, cheaper, and more reliable means to achieve adequate water without relying on the transfer of water from the Colorado River? How important is it to "live within our means" in the Virgin River watershed, and to understand and respect that water is a very precious and limited resource in the Mojave desert? The DEIS must address these and other key economic (and interrelated environmental) questions in the DEIS, including in the objective comparison of alternatives.
Richard	Spotts	955	914	Alternatives	Under a separate past NEPA scoping process, I submitted comments to the Bureau of Land Management (BLM) with concerns about the proposed LPP related amendments to the BLM Arizona Strip Field Office (ASFO) Resource Management Plan (RMP) that would allow the LPP to go outside a designated utility corridor and to go through the existing Kanab Creek Area of Critical Environmental Concern (ACEC). However, under the BOR LPP NOI, it appears that all past scoping comments may now be moot, and they must be re -submitted. So is the past public scoping input to BLM on these LPP related RMP amendments being carried forward or, like the other previous scoping input to FERC, has it "vanished" going forward? If the latter, then this is very frustrating and wasteful of both BLM and the public's

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					time and energy. If the former, then I simply wish that my previous comments to BLM be carried forward for preparing this BOR DEIS. In any case, I request that the DEIS analysis provide a clear, objective, and detailed justification for why the existing RMP decisions could not remain in effect, and why they must be amended for the LPP. In other words, what are the compelling economic, environmental, or other specific reasons that would justify these RMP amendments? Riparian habitat and dependent species are very rare in this region, and the ACEC was properly designated to protect those along Kanab Creek. BLM's organic law, FLPMA, makes ACEC designations a key part of adopting new or revised RMPs. I do not believe that any weakening or altering of an ACEC is appropriate unless there is a compelling factual justification and no feasible alternative. The mere convenience or lower costs to an applicant is not an acceptable justification.
Richard	Spotts	955	915	Special Status Species	I share the strong concerns of the Desert Tortoise Council that the LPP may adversely affect the ESA listed threatened Mojave desert tortoises and their habitats in Washington County. I fully concur with and incorporate by reference their detailed LPP scoping comments. It was unfortunate that Interior agencies almost simultaneously released the NOIs for both the controversial LPP and Northern Corridor highway, for short and largely concurrent public scoping comment periods over the busy holiday season. However, this overlap allowed me to better understand the potential connections between these two major proposed actions, in terms of potential cumulative effects on the same or similar resources, land uses, and wildlife species. For the tortoise, it is obviously important that both the LPP DEIS and BLM-FWS Northern Corridor DEIS recognize how their construction could have
Richard	Spotts	955	916	Special Status Species	"growth inducing" and other cumulative adverse impacts. So this is not only to look at or near the footprint of where new construction may occur, but also at how these projects may facilitate new development in tortoise habitat elsewhere. This potential increase in development and associated habitat destruction and fragmentation then becomes relevant in terms of HCP renewal and effects on the future prospects for effective tortoise conservation and recovery in the Upper Virgin River Recovery Unit

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Kira	Kilmer	956	918	Opinion - Opposed to Proposed Lake Powell Pipeline	3 problems: first - declining precipitation levels suggest conserving water not expanding use. for all parties in share agreement; Second - expense outweighs benefit. Third - with declining Lake Powell levels and silt buildup, pipeline has limited life expectancy. Homeowner/taxpayer of 35 years , Kira Kilmer, Salt Lake City
Laurie	Christie	957	919	Opinion - Opposed to Proposed Lake Powell Pipeline	Please stop this . It is not sustainable!
Wayne	Connors	961	920	Opinion - Opposed to Proposed Lake Powell Pipeline	All expense is to be paid by future profiteers -those who profit by it being built. That is: politicians who take money from those that profit; all real estate deals; all contractors; all suppliers; The pipeline and new infrastructure is not necessary for today's residence. - only for those in the future. Future expenses paid by future residence owners and everyone in between.
Sarah	Stock	962	922	General	Please add me to the LPP Project mailing list.
Lisa	Emery	963	925	Opinion - Opposed to Proposed Lake Powell Pipeline	i am deeply concerned about the proposed pipeline. Anyone who has been to Lake Mead or Lake Powell in the last 20 years sees the stark evidence that the Colorado does not carry enough water to fill these reservoirs, let alone supply addition amounts through an expensive and unnecessary pipeline
Kristen	Rogers-Iversen	964	926	Opinion - Opposed to Proposed Lake Powell Pipeline	Please reject the application to permit the Lake Powell Pipeline.
Jon	Carter	965	928	General	Please add me to your mailing list. Thank you
Philip	Reber	966	929	Opinion - For Proposed Lake Powell Pipeline	I am in strong support of building the pipeline. There is not doubt that the growth of our county will need that water to support our community.

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Ginger	Ritter	967	930	Water Resources	Both alignments cross a number of ephemeral and intermittent streams which provide habitat for native fish and amphibians. Kanab Creek in particular serves as habitat for speckled dace (<i>Rhinichthys osculus</i>) and breeding amphibians. The Department recommends a pipeline design and alignment that minimizes impacts to aquatic organisms, which would be optimized with the pipeline being underground in all environmentally sensitive areas. Another scoping issue is the potential transport of nonnative fish from Lake Powell to the Virgin River watershed via the
Ginger	Ritter	967	931	Water Resources	pipeline-Lake Powell currently contains 10 nonnative fish species. The Department suggests that a thorough analysis of potential impacts to native fish and other obligate aquatic organisms in the Draft EIS is warranted. Another scoping issue the Department would like to have addressed is potential transmission and dissemination of quagga mussels (<i>Dreissena rostriformis bugensis</i>) via moving water from Lake Powell. Quagga mussels could be introduced into Sand Hollow Reservoir and from there into the Virgin River and into streams crossed along the pipeline route due to pipe leakage. Quagga mussels reach extremely high population densities in lakes and reservoirs, including Lake Powell, but are also capable of using riverine habitats with soft benthic sediments. The lower Virgin River Gorge serves as the primary habitat for several native fish of the Virgin River in Arizona, the inadvertent introduction of quagga mussels there could have measurable ecological consequences that would be important to identify and analyze in the EIS. Native fish species in the Virgin River and its tributaries include two endangered species, woundfin (<i>Plagopterus argentissimus</i>) and Virgin River chub (<i>Gila seminuda</i>) and a candidate species, Virgin River spinedace (<i>Lepidomeda mollispinis</i>). Other native fish include desert sucker (<i>Catostomus clarki</i>), speckled dace (<i>Rhinichthys osculus</i>), and flannelmouth sucker (<i>C. la tip inn is</i>). To complete an adequate EIS for the Project it would be important to include a quagga mussel mitigation plan that addresses the costs and consequences of the spread of quagga mussels via the pipeline into Sand Hollow Reservoir and the Virgin River.
Ginger	Ritter	967	933	Biological Resources	Several wildlife species of ecological importance have been documented or are predicted to occur along both alternatives of the Project route in Arizona, including the Arizona toad (<i>Anaxyrus microscaphus</i>), western burrowing owl (<i>Athene</i>

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					cunicularia hypugaea), ferruginous hawk (<i>Buteo regalis</i>), bald eagle (<i>Haliaeetus leucocephalus</i>), golden eagle (<i>Aquila chrysaetos</i>), the endangered California condor (<i>Gymnogyps californianus</i>), and several bat species. To develop an adequate EIS, it would be important to identify and analyze how to avoid or mitigate impacts to these and other listed and sensitive wildlife species in the project area. To assist in developing an adequate EIS, the Department would like to highlight issues related to Species of Economic and Recreational Importance in Arizona such as mule deer (<i>Odocoileus hemionus</i>) and pronghorn (<i>Antilocapra americana</i>). These and other economically-important species occur throughout the project area and cross both alternatives. The North Kaibab-Paunsaugunt Mule Deer Migration Corridor extends from the north rim of the Grand Canyon to the southern Utah mountains near Bryce Canyon National Park and Cedar Mountain. Thousands of mule deer utilize this movement corridor annually as they migrate from summer habitats near Bryce Canyon and the north rim of the Grand Canyon to the areas surrounding the Arizona-Utah state line. There is an important interchange between the Arizona and Utah mule deer populations during this migration that occurs within approximately eight miles of the Utah-Arizona state line. Additional mule deer movement occurs as part of this corridor crosses Kanab Creek to Bulrush and Sunshine Points south of the Kaibab Paiute Indian Reservation (see Cramer and Hamlin 2019 for more information). The North Kaibab mule deer population that uses this corridor in Arizona holds high economic value to the Department and the public.
Ginger	Ritter	967	934	Biological Resources	Ensuring the corridor's continued interchange and migration capabilities is important for management of this population into the future. Highway 89 between Kanab, UT and Page, AZ bisects the southern portion of the migration route for the Utah mule deer as they migrate to northern Arizona. In 2012, the Department partnered with the Utah Department of Transportation and the Utah Division of Wildlife Resources (UDWR) to develop wildlife fencing and mule deer crossing structures across approximately 11 miles of Highway 89 in Utah where it crosses this corridor. The wildlife fencing and these structures have facilitated the continued migration of mule deer through the corridor while significantly reducing mule deer-vehicle collisions. Between 2013 and 2018, 78,610 successful individual mule deer crossings were

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					documented at these structures. Many other species of wildlife were also documented using the structures, including mountain lion (<i>Puma concolor</i>), coyote (<i>Canis latrans</i>), elk (<i>Cervus elaphus</i>), pronghorn), and bobcat (<i>Lynx rufus</i>). If the alternative pipeline route that parallels Highway 89 is selected, it will affect the value of these crossing structures, therefore, the Department recommends that design features are implemented that do not diminish the value of the existing wildlife crossing structures and continue to allow the unimpeded migration of mule deer and other wildlife species across Highway 89 in Utah and into Arizona. In addition, the Department suggests consideration of design features for the pipeline infrastructure where it crosses Kanab Creek in Arizona. Burial of the pipeline would reduce inhibiting or modifying wildlife movement and dispersal patterns. Mitigation, such as wildlife crossing structures, would likely be required if the pipeline is not buried along the entire route. Pronghorn also occur along the western portion of the pipeline, west of Kanab Creek in Arizona and consistently cross into the Kaibab Paiute Indian Reservation. Burial of the pipeline to avoid inhibiting or modifying wildlife movement and dispersal patterns would be an important feature to evaluate in development of the EIS. Mitigation, such as periodic wildlife crossing structures, would likely be required if the pipeline is not buried along the entire route.
Carole	Anderson	968	956	Opinion - For Proposed Lake Powell Pipeline	The LPP is critically important to our region. That's why I'm asking the Bureau of Reclamation. to complete the Environmental Impact Statement for the Lake Powell Pipeline as quickly as possible and issue its Record of Decision for the project.
Kyle	McCoy	969	961	Alternatives	Add a water conservation alternative to the EIS studies. • Evaluate the costs and yields of major conservation methods.
Kyle	McCoy	969	962	Water Supply	Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. Determine a reasonable and exemplary water use rate in comparison to other water - wise communities in other states.
Kyle	McCoy	969	964	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.

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Kyle	McCoy	969	966	Climate Change and GHGs	Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Kyle	McCoy	969	967	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents
Kyle	McCoy	969	968	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Kyle	McCoy	969	970	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Kyle	McCoy	969	971	NEPA Process	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies
Kyle	McCoy	969	973	NEPA Process	are to be used in this EIS verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.
Shannon	Andersen	970	977	Opinion - Opposed to Proposed Lake Powell Pipeline	I beg that you postpone building the LPP until the two above issues are adequately addressed.

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ROBERT	BLACK	971	979	Alternatives	A water conservation alternative, one that would include a number of conservation methods to reduce the demand for water, should be included in the EIS. This may include conservation along with reuse for landscaping, agricultural water transfers, analysis of treatment of ground water, and storm water capture among other measures, which could result in more sustainable future water supplies. Such an alternative would be practical and potentially feasible from a technical and economic viewpoint. a. Evaluation of the costs and yields of major water conservation methods should be part of the analysis, including tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water -wise landscaping, incentives to convert existing properties to water -wise landscaping, and use of secondary water instead of culinary water for landscape irrigation. b. Updated information should be considered in the analysis, including recommendations in the Utah state audit of water needs projections, recent lowered population projections, Utah Department of Water Resource study of higher conservation potential, and all long -term water supplies, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties. c. A reasonable and consummate water use rate in comparison to other water -wise communities in the southwest should be determined and included in the analysis.
ROBERT	BLACK	971	980	Water Law	2. The probability and confirmation of existing claims that the water right for the Lake Powell Pipeline (LPP) is sufficiently secure for a permanent water project such as this should be determined as part of the evaluation. In addition, projections of long -term Colorado River flows under a range of future climate conditions should be evaluated, especially since the
ROBERT	BLACK	971	981	Water Law	hydrologic period of record used as the basis for average flows in the 1922 Colorado River Compact included a period of abnormally high precipitation. Recent drought in the basin may represent a return to historically typical flow patterns with climate change adding its own increased hydrologic variability.
ROBERT	BLACK	971	984	Other	The draft EIS should include a detailed cost/benefit analysis to include how the specific LPP costs will be paid back to the state and specifics on the tax burden to residents of Washington and Kane Counties. Related issues to consider may include

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					the risk of water rates increasing to a point that residents use less water and thus the state can't pay the debt as planned, the interest rates and accumulated totals over the duration of the loan, the impact of payment methods on water use and thus on water supply requirements, and the risk that water isn't available to be diverted from Lake Powell and therefore the state doesn't have the water to sell to pay for the debt
ROBERT	BLACK	971	986	Biological Resources	The draft EIS should contain a detailed analysis of potential impacts on aquatic and wildlife resources as the pipeline will cross a number of water courses and traverse a variety of wildlife habitats. Consideration should be given to any potential endangered and/or threatened species and a mitigation action plan developed to negate or lessen possible impacts
ROBERT	BLACK	971	987	Water Resources	Since the proposed and alternative pipeline alignments will all cross a number of intermittent and perennial stream drainages the draft EIS should include analyses of water quality in both the affected environment and environmental consequences. In addition, the potential impacts of construction should be detailed in the analysis to include the development and implementation of best management practices (BMP) to avoid and/or minimize potential adverse impacts to water quality from equipment, fluid/fuel spills, excavation, silt runoff, etc. Both surface and ground water downstream of construction activity should be monitored throughout the project construction phase to ensure that mitigation and BMP's are effective.
Peter	Christopher Mills	972	988	Alternatives	I also would propose a close look at "taking the people to the water rather than the water to the people". If Utah has a dependable source of water from the Colorado, let's move it a short distance to an area like Big Water, Utah. A model city could be designed and built that would support a large population and we would have a unique opportunity for urban design and futuristic development. It would also require us to evaluate just how viable Utah's water allocation actually is.
Peter	Christopher Mills	972	990	Water Supply	-The Colorado River Compact has been shown to be based on inaccurate measurements. The average annual runoff figures were on the high side. And this is now combined with our recent trend of a drought cycle. We need to make sure we are using accurate figures and to even plan for a worst case scenario situation. Does the water actually exist? And we need to use the latest scientific research, not figures

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					from the past (including the FERC studies) that may be outdated and need to be amended.
Peter	Christopher Mills	972	992	Water Law	-Are the water rights secure? These questions need to be addressed up front. Have allocations already been borrowed or traded and will it be an exhaustive and expensive process to straighten out these issues?
Peter	Christopher Mills	972	993	Water Supply	-Has Washington County made adequate progress and put plans in place to optimize use of local water resources without depending on the LPP?
Peter	Christopher Mills	972	995	Other	-Financing the project. Very little information seems to be understood by the local populace
Nancy	Coulam	973	999	Alternatives	Alternatives: There needs to be an alternative of conservation. As a resident, I can tell Reclamation and the other federal agencies that there is zero effort here to conserve water. An alternative needs to be studied about an active program of conservation, similar to what Las Vegas and other water -limited cities along the Colorado River have implemented.
Nancy	Coulam	973	1001	Other	Scope of Issues: Economics. My primary concern is that there be an unbiased economic analysis of costs and benefits of the alternatives. I highly recommend that you get in place a service agreement with the economists at TSC to ensure that this analysis is properly and fairly conducted. The economists at TSC will be able to provide the analysis that we residents need to ensure that the Washington County and State have a "ability to pay" as defined by a true economic analysis, not the biased studies that the state and WCWCD have already prepared.
Sindy	Smith	974	1247	Opinion - For Proposed Lake Powell Pipeline	The State of Utah supports the project and appreciates the opportunity to provide scoping comments for the Notice of Intent for the Lake Powell Pipeline (LPP) Environmental Impact Statement (EIS).
Sindy	Smith	974	1250	Water Resources	DEQ has been actively involved in the study of metals transport and the resulting metals concentrations in the San Juan River and Lake Powell since the 2015 Gold King Mine (GKM) spill released approximately three million gallons of metal-laden water into the Animas River. Water-quality models indicate that the contaminated

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					<p>water from the spill flowed downstream into the Animas and San Juan Rivers and terminated in Lake Powell. Lake Powell has been the terminus of metals and metal-laden sediment from current and historical mine drainage since the mid-1960s. Greater understanding of the extent of the historic releases of metals from the Bonita Peak Mining District is necessary for assessing the effect of legacy metals contamination in Lake Powell. While the GKM blowout and the resulting contamination made national news, metals transport from the Bonita Peaks Mining District in Colorado to the terminus of the San Juan River in Lake Powell has been a water quality issue for many years. A 2015 Bureau of Reclamation technical evaluation of the GKM spill estimated that 8.6 million tons of tailings have entered the river environment over the life of the watershed. According to the United States Geological Survey (USGS), “in addition to the persistent discharge of mine waste, events similar to the GKM release occurred in the 1970s, and it is generally assumed that the ultimate repository for toxic metals sourced from the mining districts in the upper Animas watershed is the fine-grained deltaic sediments in the San Juan Arm of Lake Powell (USBOR, 2015).” When sediment from these deltas is transported farther into the lake, contaminants can be released into the water and become bioavailable. Once bioavailable, metals previously held in these sediments can be potentially harmful to humans and may affect the water quality in downstream portions of the reservoir (Hart et al., 2005; Potter and Drake, 1989; Vernieu, 1997). DEQ is working to understand whether the metals in the sediment pose a risk to human health or the environment through a variety of studies that we encourage the Bureau of Reclamation to consider while developing alternatives and evaluating impacts. A summary of these studies is provided below. Since 2012, Utah has had a fish consumption advisory due to mercury levels in striped bass. The mercury advisory was issued after considerable remobilization of deltaic sediment during a drought that ran from 1999 to 2005, suggesting linkages between sediment and water</p>
Sindy	Smith	974	1252	Water Resources	<p>quality in Lake Powell. DEQ has identified exceedances of water quality criteria for cadmium (Cd) at the sediment-water interface in the San Juan and Colorado River arms of the lake. Mercury and selenium bioaccumulation occur in the food web downstream of Lake Powell on the Colorado River, with the highest concentrations</p>

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					in the basal food web resources just below Glen Canyon Dam, suggesting the export of bioavailable sources of these metals from Lake Powell (Walters et al., 2015). A recent USGS study on mercury methylation and bioaccumulation in Lake Powell found that changes in the upstream to downstream water column concentrations of particulates led the lower part of the reservoir to be more conducive for methylmercury production and its subsequent transfer into the base of the food web (Naftz et al. 2019).The growing Utah population, planned use of Lake Powell as a municipal water source, and proposals (Fill Mead First) to lower the operating level of Lake Powell (Schmidt et al., 2016) all raise concerns about the possible adverse effects from the remobilization of metals in deltaic deposits from fluctuating lake levels and the timing and amount of water moving through the system. DEQ encourages the Bureau to consider alternatives that reduce the potential for metal remobilization in Lake Powell’s riverine deltas.
Sindy	Smith	974	1254	Water Resources	The long-term impacts to the water quality in Lake Powell from years of metals releases from the 48 upstream abandoned mines and mining activities in the Bonita Peaks Mining District remain unknown. DEQ, the United States Geological Survey (USGS), and University of Utah have launched or completed in-depth studies on the fate and transport of metals in depositional sediments in the San Juan River/Lake Powell to better understand the implications to water quality and watershed mitigation from metals loading into the lake. These include the following:1. Impacts from Mine Drainage to Sediment and Water Quality along the San Juan River and Lake Powell in Utah (DEQ, 2018). This report, prepared by the Division of Water Quality (DWQ), reviewed and quantified water column, particulate, and sediment metal concentrations in the San Juan River, identified the transport of materials downstream and their fate in Lake Powell, and quantified contributions from other mine- and hydrologic-sources. DEQ and USGS were particularly interested in understanding the potential long-term impacts of sediment deposited/accumulated in the San Juan River and Lake Powell. Further, the report compiled historical and recent water-quality monitoring data, evaluated sampling methodology and lab analysis, examined waterquality assessment and screening, analyzed sediment data assessment and screening, looked at spatial and temporal water quality and sediment

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					trends, and explored potential soil and bedrock source contributions to metals loading.
Sindy	Smith	974	1255	Water Resources	<p>2. Screening Level Human Health and Agricultural Risk Assessment- San Juan River and Lake Powell (DEQ/Tetra Tech, 2018). DWQ contracted with Tetra Tech to conduct a human health risk assessment for the San Juan River and Lake Powell to determine impacts from the Gold King Mine spill. The assessment was completed in 2018 and serves as a screening exercise to conservatively estimate potential risks to both humans and ecology from exposure to water and sediment from the San Juan River. This work is important for understanding potential current risks to human and ecological health and drive future data-collection efforts to fill gaps.</p> <p>3. Lake Powell Coring Project (USGS/DWQ). The Lake Powell Coring Project was undertaken to improve scientific understanding of the concentration, mass loading, distribution, and bioavailability of metals through the total depth of sediment deposits in Lake Powell. Concerns were raised about metals in the San Juan River and Lake Powell after sediment data collected by the USGS in August 2010 showed a measurable increase in metals at four meters depth. The current study aims to determine the character of metal deposition, the chronology of sedimentation, and rates of metal deposition to help assess potential water quality impacts from lower lake levels. USGS completed its sediment coring work on Lake Powell in December 2018. Forty individual cores were extracted from the Colorado River and San Juan River deltas of Lake Powell. USGS is currently analyzing the cores at the National Lacustrine Core Facility in Minnesota. Two aspects of the coring project are particularly relevant to the Lake Powell Pipeline:</p> <ul style="list-style-type: none"> • Evaluation of evidence of the possibility of remobilization of deltaic sediment during historically low lake levels. • Assessment of potential risks associated with future sediment remobilization during low lake levels. <p>It is unknown how hydrologic variability, combined with the future use of Lake Powell water resources, will affect the remobilization of sediments and possible release of accumulated metals. The coring project hopes to identify historical trends to shed light on the short- and long-term changes to metals concentrations in the deltaic sediments during high, medium, and low water periods. For more information on the project as it progresses, please contact Lucy Parham at lparham@utah.gov.</p>

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Sindy	Smith	974	1257	Water Resources	4. Mining Inventory and Source Identification (University of Utah/DWQ). DWQ is working with the University of Utah to conduct a mining inventory and source identification study in the San Juan River watershed. The primary objective of this study is to differentiate mining and non-mining sources of contaminants in the tributaries of the San Juan River while also using signatures of those contaminants to delineate sources in Lake Powell sediment. This is an ongoing project that began in 2017 and is estimated to be completed by 2020. For more information on the study as it progresses, please contact Lucy Parham at lparham@utah.gov .
Sindy	Smith	974	1259	Water Resources	303(d) Impaired WatersThe Federal Clean Water Act § 305(b) requires states to continuously monitor surface waters and, on a biennial basis, assess whether waterbodies, classified as assessment units (AUs), are meeting their beneficial uses under state water quality standards (R317-2, Standards of Quality for Waters of the State). AUs that do not support their beneficial uses are considered impaired. Beneficial uses include drinking water, recreation, aquatic life, and agriculture.Under § 303(d) of the Clean Water Act, states must produce a list of impaired water bodies, which then require a total maximum daily load (TMDL). A TMDL is the amount of a pollutant a waterbody can receive from point and nonpoint sources without exceeding the water quality standard for that pollutant. Furthermore, impaired waterbodies are prioritized for TMDLs based on health concerns and other state-specific considerations.Sand Hollow Reservoir will be receiving Lake Powell water from the pipeline project and is currently listed as Category 2, supporting of its beneficial uses. The project should aim not to degrade the quality of this reservoir.The 2016 Integrated Report (IR), a comprehensive survey of the water quality of surface waters in the state from 2008 to 2014, identified three AUs along the pipeline route that are impaired for one or more beneficial uses. Note: DWQ is currently finalizing its combined 2018- 2020 IR, and additional 303(d) AUs may be included in the upcoming report. Please contact Jodi Gardberg at jgardberg@utah.gov for additional information.
Sindy	Smith	974	1260	Water Resources	Impaired waters identified in the 2016 IR affected by the proposed Lake Powell Pipeline project include: • Paria River: non-supporting for OE Bioassessment 1 for

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					nongame fish and other aquatic life (3C) and total dissolved solids (TDS) for agriculture (4)
Sindy	Smith	974	1263	Water Resources	<ul style="list-style-type: none"> • Johnson Wash: non-supporting for boron for agriculture (4); for selenium for nongame fish and other aquatic life (3C): and for total dissolved solids (TDS) for agriculture (4) • Lake Powell: non-supporting for pH for warm-water species of game fish and other warm-water aquatic life (3B) and for E. coli for cold-water species of game fish and other cold -water aquatic life (3A).Two additional waters upstream from Lake Powell are impaired for a suite of metals. It is unknown how these impairments might affect the water in Lake Powell should lake levels/conditions change. • San Juan River from Lake Powell to the confluence with Chinle Creek within state jurisdiction: non-supporting for dissolved aluminum for warm-water species of game fish and other warm-water aquatic life (3B); for dissolved copper for warm-water species of game fish and other warm-water aquatic life (3B); for dissolved oxygen for warm-water species of game fish and other warm-water aquatic life (3B); for dissolved iron for warm-water species of game fish and other warm-water aquatic life (3B); and for dissolved mercury for warm-water species of game fish, warm -water aquatic life, and human health (3B, HH3B). • San Juan River from the confluence with Chinle Creek to the confluence with Montezuma Creek within state jurisdiction: non-supporting for dissolved aluminum for warm -water species of game fish and other warm-water aquatic life (3B); for dissolved cadmium for warm-water species of game fish and other warm -water aquatic life (3B); for dissolved iron for warm-water species of game fish and other warm -water aquatic life (3B); and dissolved lead for warm-water species of game fish and other warm-water aquatic life (3B).
Sindy	Smith	974	1264	Mitigation	The State recommends the placement of stream gages at the pump stations to monitor water flow through the pipeline. These gages would help detect pipeline leaks and monitor water quality before Lake Powell water reaches Sand Hollow Reservoir. This water monitoring could
Sindy	Smith	974	1265	Mitigation	become even more critical as scientists collect and analyze data on the remobilization of metals from San Juan River deltaic sediments, the rate and degree of mercury

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					methylation in the lower reaches of Lake Powell, and potential impacts from fluctuating lake levels on water quality.
Sindy	Smith	974	1267	Water Resources	The Section 401 Certification allows the state to certify whether projects/activities will violate any applicable state water quality standards. If the project is issued under a U.S. Army Corps of Engineers (USACE) Section 404 Nationwide Permit (NWP), then the project will qualify for “blanket” 401 Water Quality Certification coverage. “Blanket” coverage refers to the requirement to meet the conditions identified when DWQ certified all NWPs with conditions in 2017. If the project is going to be issued under an Individual USACE Section 404, then an Individual Section 401 Water Quality Certification through the DWQ will be required. DWQ reserves the right to require an Individual Section 401 Water Quality Certification regardless of USACE permit type. An application for a Section 401 Water Quality Certification should be made simultaneously with an application for a Section 404 Permit through USACE. For further information, please contact Leanna Littler at lnlittler@utah.gov .
Sindy	Smith	974	1268	Mitigation	The State encourages Reclamation to look at alignments that do not contribute to existing impairments or disturb high-quality waters. The Division suggests the following BMPs for pipeline construction in addition to any conditions required under a Section 404 permit: <ul style="list-style-type: none"> • The alignment of the new pipeline should intersect stream channels as perpendicular as possible to minimize stream disturbance and impacts. • Clearing, grubbing, and other disturbance of riparian vegetation should be kept to the minimum necessary. • Backfill activities should be accomplished in a manner that stabilizes streambeds and banks to prevent erosion and should consider establishment of native vegetation. All contours should be returned to pre-disturbance conditions to the extent practicable, and the completed activities should not disrupt or impound streamflow. • If possible, seasonal conditions should be considered to ensure work is completed under dry conditions. If surface water is present, it should be diverted away from active construction/un-stabilized areas.
Roger	Hedlund	975	1006	Renewable Energy	This water will not flow through the turbines at Glen Canyon Dam so there is a loss of clean energy in a time of carbon driven climate change and a big impact on our rural power grid.

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Roger	Hedlund	975	1007	Water Supply	There are no guarantees that there will be enough water in the Colorado river and its tributaries over the next 10 -50 years so then what happens?
Roger	Hedlund	975	1008	Native American Concerns	• There are numerous indigenous peoples/tribes that have senior water rights which will be adversely impacted
Roger	Hedlund	975	1009	Alternatives	The EIS should evaluate all plan alternatives against worst -case scenarios for future water
Roger	Hedlund	975	1010	Alternatives	availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems —including national wildlife refuges and critical habitats —and endangered species. The analysis should be based on the best available science and climate models.
Kimberly	Ruesch	976	1011	Opinion - For Proposed Lake Powell Pipeline	We, therefore, provide our committed support to the cmTent review process for the LPP as a necessary option for water sustainability for our city and region. As representatives of this community, we look forward to being a part of the process and in providing our voice on this vital project. IfI can be of any further assistance, please contact me at (435) 656-6309.
William	Littig	977	1012	Opinion - Opposed to Proposed Lake Powell Pipeline	Something that we also need to control or at least be concerned about in urban areas please do not invest in this Waze for pipeline investing in ways that we can save water and survive with what we have. Thank you.
Stephanie	Weems	978	1015	Alternatives	Something that we also need to control or at least be concerned about in urban areas please do not invest in this Waze for pipeline investing in ways that we can save water and survive with what we have. Thank you.
Guy	& Nancy	979	1023	Public Health and Safety	Most homeowners here are very concerned about possible health issues that may result from living in close proximity to overhead power lines. Some of the homes on this street have sleeping areas that are only 20 feet from the sidewalk. From merely the stress and fear of the situation , to the many documented relationships between

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					disease processes and proximity to overhead power lines, this is an environment that will negatively affect the quality of our lives and health.
Guy	& Nancy	979	1031	Alternatives	The land adjacent to Dixie Springs consist s primarily of Water District Lands, with smaller amounts of State Lands, and private parcels , and is largely undeveloped. There are a few planned residential communities soon to be developed in the outlying areas that will need new power services, and more residential and commercial growth projects are in planning stages. Along some of the main roads bordering Dixie Springs, there are already existing overhead power transmission lines. There is also an existing transmission line coming in from northwest of Dixie Springs that joins the Dixie Power Substation which is the destination target of the power transmission line route on 3400 W. It would seem that engineering a new route , which could include tying into and utilizing existing and planned power line installation routes would be very instrumental in reducing the cost and impact of our plea to route the lines outside of our community.
Jane	Whalen	980	1659	NEPA Process	The Bureau of Reclamation (BOR) said they were using the Federal Regulatory Energy Commission's (FERC) studies for the DEIS and will update them with current information . The Coalition has given very details comments outlining the flaws in the FERC studies. BOR recommended we resubmit our comments for this new scoping process. Therefore, we will submit our past comments in Appendix A part 1 of 2. The comments are also posted on FERC's website under elibrary Docket Number P- 12966. The elibrary web site is where all the FERC comments on the project are filed.
Jane	Whalen	981	1638	General	This is the 2nd part to Submittal 1007Appendix A. Part 2 of 2 additional information on water supplies and risk of depending on the Colorado River for the pipeline
Barbara	Richmond	1004	1044	Opinion - Opposed to Proposed Lake Powell Pipeline	It is so discouraging to write in protest on a matter as such knowing that developers and big money will win again. Money vs the long term health of people and our planet. This project has never been, and never will be, a good idea. ,

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Elisabeth	Petersen	1020	1046	Opinion - Opposed to Proposed Lake Powell Pipeline	Hello, My name is Elisabeth York I live on 3400 in Dixie Springs. I will be one of the residents who will be greatly affected by the Lake Powell pipeline project. I would like to add my voice to those of my neighbors. Please take into consideration the well - being of our small community and look for other routing options for these power lines. There is no reason to disrupt an already established and peaceful neighborhood when there are other more available and less disruptive and destructive routes. Thank you for your time and consideration.
Shane	York	1021	1049	Opinion - Opposed to Proposed Lake Powell Pipeline	Hello, My name is Shane York I live on 3400 in Dixie Springs. I will be one of the residents who will be greatly affected by the Lake Powell pipeline project. I would like to add my voice to those of my neighbors. Please take into consideration the well - being of our small community and look for other routing options for these power lines. There is no reason to disrupt an already established and peaceful neighborhood when there are other more available and less disruptive and destructive routes. Thank you for your time and consideration.
Michael	Cundick	1022	1052	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to the Lake Powell Pipeline.
Martha	Ham	1023	1053	Water Supply	The Colorado River Compact has been shown to be based on inaccurate measurements. The average annual runoff figures were on the high side. And this is now combined with our recent trend of a drought cycle. We need to make sure we are using accurate figures and to even plan for a worst case scenario situation. Does the water actually exist? And we need to use the latest scientific research, not figures from the past (including the FERC studies) that may be outdated and need to be amended.
Martha	Ham	1023	1055	Water Law	-Are the water rights secure? These questions need to be addressed up front. Have allocations already been borrowed or
Martha	Ham	1023	1056	Water Law	traded and will it be an exhaustive and expensive process to straighten out these issues?

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Martha	Ham	1023	1058	Alternatives	-Has Washington County made adequate progress and put plans in place to optimize use of local water resources without depending on the LPP?
Martha	Ham	1023	1060	Other	-Financing the project. Very little information seems to be understood by the local populace.
Eric	Bonner	1024	1003	Opinion - Opposed to Proposed Lake Powell Pipeline	I have been a resident of Washington County for 35 years and I strongly opposed to the Lake Powell Pipeline (LPP) as it is not prudent or necessary until all conservation alternatives have been exhausted.
Eric	Bonner	1024	1004	Alternatives	Washington County has some of the highest per capita use and the lowest prices for the water in the west. A higher priority should be on collecting accurate water use and supply data, becoming efficient in our water use first, by boosting local water supplies, increasing conservation, creating pricing strategies, and reuse that could result in significant cost savings and provide enough water for growth. Southwest Utah is blessed with many sources of local water that can be developed incrementally as needed, at a fraction of the cost of the Pipeline. The LPP is not the answer and is unsustainable over time. We should be pursuing a strategy of making our area more self-reliant by reducing water demand and developing new and unused water resources locally. These actions could contribute to a more reliable water supplies. Local water sources will deliver southern Utah's future affordably and reliably, without burdening present and future generations with a massive debt and a water supply vulnerable to drought, litigation, political conflict, controversy, and uncertainty.
Eric	Bonner	1024	1005	Socioeconomics	The laws that govern the Colorado River have allocated more water annually than the river produces. This is an economic risk that Utah has ignored and is not addressed in the LPP studies.
Jackson,	Frankie	1025	1013	Water Supply	Recommendation: Update (FERC) studies with Reclamation studies and recommendations on climate change. According to the 2012 BLM and Bureau of Reclamation report, Colorado River Basin Water Supply and Demands (Executive Summary), the Colorado is already over-allocated. Rapid population growth,

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					increasing water demand, and the worst drought in the last century all suggest that depletion via the Lake Powell Pipeline will further contribute to imbalance between supply and demand. As indicated in the report, lower water levels in the reservoir adversely impact hydropower and recreational use. Falling levels in Lake Mead also require greater release from Lake Powell in order to balance the contents of the two reservoirs. If Lake Powell drops below a critical level (3,490 ft.) no hydropower can be produced. Reclamation recognizes this possibility, even with Drought Contingency Planning. The needs of the lower basin ALREADY exceed their 7.5maf allotment, whereas water supplies in Washington and Kane counties are adequate. Any strategy, therefore, should take this into consideration and reflect a basin-wide approach rather than focusing on St. George.
Jackson,	Frankie	1025	1016	Purpose and Need	Justify reasons for “spur” pipeline to Johnson Canyon. It is unclear why Kane County (and Johnson Canyon in particular) need additional water because Kane county officials recently attempted to sell “surplus” county water to Southern Red Sands mining operation for decades to come. Greater transparency is needed. If the pipeline water will be used for agricultural purposes in Johnson Canyon (rather than future commercial development) this should be binding in the agreement.
Jackson,	Frankie	1025	1017	Alternatives	Add water conservation to the EIS. Although some strides have been made in St. George toward water conservation further efforts are needed before spending over a billion dollars on a pipeline. For example, a graduated scale for water use should be implemented immediately in order to reduce unnecessary consumption. Currently, water rates are cheap and fail to penalize heavy water use.
Jackson,	Frankie	1025	1018	Socioeconomics	Determine the cost to residents. Although the state of Utah may cover the initial cost of the pipeline, the citizens of Kane and Washington counties will likely see increases in building impact fees, property taxes, and higher water rates. If continued drought conditions result in further draw-down of Lake Powell, curtailing the availability of water to St. George, its citizens will be stuck with the bill without the full benefit of the water.
Jackson,	Frankie	1025	1019	Alternatives	Higher water rates instituted now will facilitate greater water conservation. This and development of local water resources and other conservation measures such as grants

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					for replacing sod with desert landscaping , and especially the curtailing the building of golf courses, would help determine if a pipeline was even required.
Jackson,	Frankie	1025	1020	Water Supply	In addition, more transparency is needed to better assess various models that have been proposed for future water use and to reconcile their significant differences.
Jackson,	Frankie	1025	1021	Purpose and Need	It is my understanding that the reason for the pipeline originally was to facilitate growth and economic development of the St. George area. Obviously, that is no longer necessary because of the rapid increase in population in recent years. The projected growth for St. George is not sustainable in a desert region without substantial expense and risk associated with the pipeline; therefore, controls on growth are preferable to expensive projects that deplete the critical storage capacity of the Lake Powell and adversely impact the environment and the Colorado River Basin in general.
Jackson,	Frankie	1025	1022	Opinion - Opposed to Proposed Lake Powell Pipeline	The original authors of the Colorado Compact assumed that the river would produce substantial surplus beyond what was needed for present and future growth, while failing to acknowledge the risks involved if they were wrong. In light of a changing climate that necessitates Drought Contingency Planning, it is important not to repeat their mistakes.
garypeggy		1026	1024	Alternatives	The formal information which I've seen always refers to the two alternatives. A third alternative of having no pipeline needs to be considered. This one would be based on cost and yields of major conservation methods. The techniques of dispersing water in agriculture are extremely wasteful. In buildings, water conservation fixtures should be mandatory for all new construction or modifications and repairs. Landscaping should be designed using plants with low water need, don't over the plants as is frequently done and as much as possible use secondary water for watering. Municipalities should not support water intensive projects.
garypeggy		1026	1025	Water Supply	At present the Colorado River has adequate flow to feed the LPP without dropping the Lake Powell water level below that needed for power generation. There is a good chance that will not always be so. Over the long term the yearly average precipitation feeding the Colorado River basin is predicted to decrease. How long will it be before

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					this will affect the flow in the LPP?The population in the areas serviced by the LPP is predicted to increase by close to a factor of three in the next forty years. This will result in a considerable increase in the demand for electricity, leaving a smaller or maybe no surplus of water.
Allen	Gilberg	1027	1028	Alternatives	The need for the Lake Powell Pipeline (LPP) has not been fully described, and the current use of water in the area is very high, based on comparisons of per-capitita use in other communities the west. As such, conservation would seem to be a much better solution for current needs, particularly on a cost-per-user basis.
Allen	Gilberg	1027	1029	Socioeconomics	The cost of the project is not firm, and may be severely impacted by increased construction costs (which always happen), lack of water in the source (from climate change) and additional litigation from other Colorado River Compact water users.
Allen	Gilberg	1027	1030	Water Supply	The original compact over-allocated the water in the Colorado River. The allocations were established in a wet year, many years ago. There is no assurance that that amount of water will continue to be available. If built, the LPP may be an expensive burden that provides no water.
Allen	Gilberg	1027	1032	Biological Resources	The environmental impact of the project has not been fully considered. There may be wildlife migration issues.
Allen	Gilberg	1027	1034	Lands and Realty	The lands that the pipeline crosses may not be suitable - consider the Grand Staircase lands that have been temporarily excised from the monument, but are currently under suit. all of the right-of-ways may be problematic.
Allen	Gilberg	1027	1035	Opinion - Opposed to Proposed Lake Powell Pipeline	For these and other issues pertaining to the proposed LPP project I do not support and would recommend you do not allow this project.
Debra	Csenge	1028	1036	NEPA Process	Among my concerns are the following. I feel that more studies of the impacts of the LLP should be made before any actions are taken. Impacts on the land, plants, and animals that live where the pipeline will pass through. The costs of the project on the communities and the taxpayers impacted by the pipeline. More study on the impact

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					of climate change on the Colorado River and sources of water for the LPP and how the volumes of water are likely to be affected.
Debra	Csenge	1028	1039	Alternatives	In addition, I think that one of the alternatives should be the consideration of conservation tactics to improve the efficiency of water usage which we should be doing anyway. It is of grave concern to me that we should be considering piping more water when we are wasting so much as is.
Kitty	Wooldridge	1029	1041	Opinion - Opposed to Proposed Lake Powell Pipeline	We would like to make a few comments opposing the proposed Lake Powell Pipeline.
Kitty	Wooldridge	1029	1043	Water Supply	We are very concerned that there will be enough water in the Colorado River for this massive proposed withdrawal. The river has already been over-allocated. Utah's water rights have long been absorbed by current uses and the effects of climate change on water availability is a deep concern.
Kitty	Wooldridge	1029	1047	Socioeconomics	The cost of this project is overwhelming. We are not opposed to paying more for current water usage. Paying more for our current water usage would be a step to encouraging conservative water use. We are opposed to our water bills currently being increased to pay for this pipeline that may never be completed.
Kitty	Wooldridge	1029	1050	Aquatic Invasive Species	We are concerned about the potential introduction of the quagga mussels into the Virgin River water systems. We don't see how this could be avoided, since filters are not effective against microscopic early stages of the mussel.
Kitty	Wooldridge	1029	1051	Visual Resources	We are also concerned about the environmental impacts of installing the pipeline, including the generators. There will be roads, ground clearance, and other disturbances to our beautiful red rock area.
Katie	Wallace	1030	1054	Water Supply	Lack of water availability in Lake Powell: I saw the graphics for the projected demographic change in Washington County from now until 2065 at the public presentation in Kanab about the pipeline. However, I noticed there was no graphic to represent the amount of water projected to be in Lake Powell. In an era of

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					extreme climate change, the water supply in Lake Powell is far from secure in the foreseeable future. In the EIS, I would like to see studies that analyze the water levels for the foreseeable future. I'm not convinced the water will be there, which means this entire pipeline is a boondoggle. Part of the EIS should also include what will happen to the pipeline if lake levels fall dramatically.
Katie	Wallace	1030	1057	Socioeconomics	Cost: My second biggest concern to the project is cost. The cost for this is outrageously large. I know it's not easy to conjure water in the desert, no matter how you slice it. However, I would like the EIS to include analysis of all of the other options available. What other leads has Washington County pursued? Is this really the most economically solvent? Show me that in the EIS.
Katie	Wallace	1030	1059	Alternatives	Alternatives that are not a pipeline: It was stated during the meeting that Washington County conserves more water than any other county in Utah, but I have also seen graphics showing that Washington County's per capita water use is 100 gallons more per day than Las Vegas, over 150 gallons more per day than the national average, and close to 200 gallons more per day than Phoenix. Clearly, more can be done in conservation than is currently being done. I would like to see how halving Washington County's per capita water use would do in projections about the future. As stated above, the EIS should make a very convincing argument that there is no other viable solution; thus far, I have not seen the other options exhausted.
Katie	Wallace	1030	1062	Purpose and Need	Kane County should be excluded: Unless there is a convincing argument that Kane County's population is also increasing at such a rate as to outpace its water supply (which is currently described as abundant enough to sell off a large chunk to a private company), Kane County should be left out of this. I am a resident of Kane County and I do not relish footing the bill for such an expensive boondoggle that we do not need.
Katie	Wallace	1030	1063	Alternatives	IF Kane County is included, bring the water all the way to town: If it is determined that Kane County will stay a part of the pipeline project, there is no good reason to bring the water only to Johnson Canyon. It should go to town, where all of the existing county infrastructure is. Extend that side pipe just a bit farther.

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Katie	Wallace	1030	1065	Transportation	Construction: Kanab is quite removed from major services of any kind. Many folks commute to St. George, go to dentists and specialty doctors in Hurricane and St. George, and resupply on groceries and supplies in the bigger cities of Washington County. To get anywhere from Kanab takes a tremendous amount of effort and time. Construction delays for the better part of "up to six years" would be a nightmare for Kane County residents. If I travel to St. George 10 times per year, and I have just a 10 minute delay on each one-way trip, that is 200 minutes per year, or over 3 hours of my time lost on the road due to construction. If the project went on for 6 years, that would be close to 20 hours of my life. (A 10 minute delay would be on the low end for a construction delay, so that is overall a low estimate.) Whatever can be done to mitigate construction delays along the highway corridors should be included in the EIS.
Katie	Wallace	1030	1067	Cultural Resources	Indigenous sites: I would like to ensure that construction is appropriately monitored by local indigenous groups so that artifacts that may come up in construction are appropriately managed. Please make sure this is clear in the EIS.
Craig	Stratton	1031	1069	Opinion - For Proposed Lake Powell Pipeline	The pipeline needs to happen and I am in complete support of this project.
Lisa	Landenburger	1032	1071	NEPA Process	The LPP project entails construction of a 140-mile pipeline in southwestern Utah to deliver water from the Lake Powell Reservoir on the Colorado River to Washington, and to a lesser degree Kane, counties in southwest Utah. The pipeline is estimated to cost Washington County a minimum of 1.5 to 2 billion dollars with increased water rates and property taxes imposed on the citizens of southwest Utah. In addition, the diversion of water from the Colorado River would have far reaching environmental impacts on state, federal and tribal lands and its wildlife that is reliant on this precious water resource. For this reason, I believe it is essential that the decision process is transparent, devoid of political interest, and relies on the best scientific information available.
Lisa	Landenburger	1032	1073	Water Supply	The ever-increasing trend in over-allocation and over-use of the Colorado River system threatens the very lifeblood of lands owned by at least 22 federally recognized

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					tribes as well as lands under public ownership, including 7 National Wildlife Refuges, 4 National Recreation Areas, and 11 National Parks. In addition, it will diminish water supply in lower basin communities in Arizona, California, and Nevada. The demands imposed on the flow of the Colorado River by the LPP project, sacrifices tomorrow's critical needs for unsustainable future growth of Utah's Washington County.
Lisa	Landenburger	1032	1075	Purpose and Need	This fundamental deficiency in the UDWR source data leads to an inevitable uncertainty not only in the Division's conclusion that water demands will exceed water supplies by 2040, but also leads to uncertainty regarding the need for and the efficacy of the LPP project itself.
Lisa	Landenburger	1032	1078	Alternatives	The bottom line of the 2015 audit report is that conservation measures should be exhaustively explored as plausible alternatives to the LPP project.
Lisa	Landenburger	1032	1079	Alternatives	As a concerned homeowner in this beautiful state, I strongly recommend that the BOR seek productive and mutuallybeneficial partnerships with various non-governmental research and advocacy organizations to actively
Lisa	Landenburger	1032	1080	Alternatives	pursue more cost effective and efficient conservation-based alternatives to the Lake Powell Pipeline project.
Richard	Brosseau	1033	1082	Opinion - For Proposed Lake Powell Pipeline	It is my understanding that studies have shown that this project can and will pay for itself. Given all of the above, I would like to express my support for the Bureau of Reclamation to approve the application process from the City of St. George and the Washington County Water Conservancy District, and let the process continue so that this area can meet the water demands now and for future generations.
Jordan	Herman	1034	1083	Water Supply	I'm writing to you with concerns about the intention to move forward with the Lake Powell Pipeline Project. The Colorado River Basin is a fragile ecosystem and may be unable to support the 28 billion gallons of water that would be withdrawn in Utah. This is an incredible resource for nature and also for municipalities and agriculture in Utah, and using it to support poor water practices in places like St. George may prevent other uses of the water in the future.

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Jordan	Herman	1034	1086	Alternatives	PLEASE evaluate all existing and alternative plans using rigorous scientific techniques, and base your decision on evidence. We are counting on you for our future.
Ann	O'Connell	1035	1090	General	Below is a partial list of costs to the environment of the proposed Lake Powell pipeline – all of which must be accounted for in the environmental impact statement:Major soil and rock displacementDisruption of surface water patterns (almost more significant in the desert than in temperate climates)Barrier to animal migrations – life is especially fragile in desert landscapesDamage to soils and topography caused by work crews and construction equipment and processesDamage by maintenance crews and equipmentShort- and long-term damage from roads necessary for pipeline construction and maintenanceDestruction of Native American sitesPossible destruction of Mormon Pioneer trail remnantsPollution from power stations attached to the pipeline – exhaust, fuel spillsThe list above is no doubt incomplete and you will receive a more detailed and comprehensive list. To the uninitiated it is a bleak and unimportant landscape, but to those who know it, it contains areas of rare beauty and ecological, and historical importance that should not be sacrificed to the construction of a pipeline that will have no use or value.
Ann	O'Connell	1035	1092	Climate Change and GHGs	The environmental impacts of the Lake Powell Pipeline project must be measured against the scientific consensus that global warming will further reduce the water supply in the Colorado River so there will be no water to transport and that heat will make the area unlivable so there will be few human inhabitants to need it.
Ann	O'Connell	1035	1095	Water Supply	The states that use Colorado River water have only recently renegotiated their water allocations because scientists had found that their original interstate compact relied on temporarily high-water flows from a period of unusually wet years. Now the Bureau of Reclamation will need to account for even lower flows as is now predicted by the best current scientific models. Since the Colorado River water flows will be dramatically lower in the future, the Colorado Compact states will have even less water to allocate among present users. There will be no “surplus” water to be piped to Washington and Kane counties.

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Ann	O'Connell	1035	1097	Climate Change and GHGs	In addition, the Bureau of Reclamation will need to consider that that scientists also predict that the desert southwest will become dramatically warmer, probably to the point that humans will choose not to live
Ann	O'Connell	1035	1098	Climate Change and GHGs	there. Therefore, the current dramatic urban development will cease and it is probable that people will migrate elsewhere making it unnecessary to import water for urban growth
Ann	O'Connell	1035	1099	Opinion - Opposed to Proposed Lake Powell Pipeline	There are no benefits to out-way the costs of the pipeline, either environmental or financial.
TJ	Uysal	1036	1100	Opinion - Opposed to Proposed Lake Powell Pipeline	I do not believe there is sufficient justification and rationale for building a pipeline from Lake Powel to St George area.
TJ	Uysal	1036	1102	Climate Change and GHGs	With the climate change, future water level in Lake Powell is an unknown. In the next 10-20 years, if not sooner, communities claiming and depending upon a share of that water could be very disappointed. Setting all the environmental and cost impacts of building a pipeline aside, with possible Lake Powell water shortage, we may be looking at 70+ miles of rusting ugly
TJ	Uysal	1036	1104	Climate Change and GHGs	pipeline and its pump infrastructure, running through pristine wilderness, proving to be too costly and economically unfeasible to maintain for what little water it may end up delivering.
TJ	Uysal	1036	1106	Socioeconomics	Cost of such a pipeline over-time will be a big burden to the taxpayers of this area. If the water delivery from Lake Powell did not live up to the claims, the whole thing would be one gigantic public money waste, and the citizens would be left holding the leaking bucket, no pun intended.
TJ	Uysal	1036	1107	General	Environmental impacts are altogether another story and not even properly quantified.

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TJ	Uysal	1036	1108	Socioeconomics	I do not believe there is adequate evidence presented for the costs of this project, cost risks, best case and worst case impacts on the citizens' pocket books? People need to know the worst case scenarios and be prepared to absorb the taxes if they cast a vote to do this project. It would be a travesty if they were led down a blind alley with nothing to show for after billions in spending, and water problems went unsolved. In the meantime, few companies would probably leave with fatter bank accounts. If the investment failed, would the local government decision makers and local congressmen bet their net worth and families' future on such a project?
TJ	Uysal	1036	1109	Alternatives	11. Let's assume there were few billion dollars in public pockets, has anyone looked at how else that money can be put to use towards other water solutions perhaps with much less risk?12. Starting with the conservation and growth management measures listed above, meaningful results can possibly be achieved in the next 10-20 years and the rationale and feasibility for a pipeline can be revisited if necessary, and if there is still water to pipe in.13. Possible eventuality of not having enough water in Lake Powell with or without the pipeline, requires a strong plan B for this area. Betting the farm on the pipeline alone is irresponsible. Therefore, a pipeline should never be approved until a plan B is put on the table, and other measures given a chance to succeed.
TJ	Uysal	1036	1112	Water Supply	The water department and USBR must characterize to the taxpayers in this area what our world would look like in the possibility that there is not sufficient water from Lake Powell. How many gallons per person per day water budget we would have over the years? What would be the population growth limit without that additional water, with and without other conservation measures? What would be the cost of water used per gallon over the coming years?
Ken	Rockwell	1037	1115	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing to urge you to cancel the Lake Powell Pipeline Project. There is simply not enough water available in the Colorado River Basin given the serious impacts of climate change in this basin.
Ken	Rockwell	1037	1117	Water Supply	The EIS should evaluate all plan alternatives against worst-case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate

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					alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems—including national wildlife refuges and critical habitats—and endangered species. The analysis should be based on the best available science and climate models.
Marv	MWP	1038	1123	Purpose and Need	There has yet to be an accurate, or detailed of Purpose and Need to address the basis for this project.
Marv	MWP	1038	1124	Alternatives	2. The long history and current wasteful water practices by Washington and Kane Counties, with more than double the national per capita average water usage, conservation needs to be implemented before any consideration of a massive \$3 billion inter-basin transfer of water ever be considered. There needs to be a conservation based, baseline of consumption established first. 3. As part of implementing long neglected conservation, higher water
Marv	MWP	1038	1126	Alternatives	prices need to be established to encourage reduced water consumption. 4. Subsidizing the cost of water through property taxes must stop. Washington County and the City of St. George both subsidize water prices with property taxes. This encourages waste and discourages conservation. Water prices should must reflect the full cost of the water separate from any other municipal service or expense.5. City and county mater managers do not include surplus culinary water that is currently being used in agriculture in available supply. It is imperative that accurate measures of available water supplies must be audited to assure truth in reporting actual water resources. 6. According to the USGS, farms and ranches currently use 52% of the water consumed in Washington County and 85% of the water consumed in Kane County. These uses can shift as populations increase before tapping expensive inter-basin water transfers. 7. A huge amount of the water supplied by the Washington County and Kane County Water Districts is secondary water and much of it is unmetered. The vast majority of secondary water users have no idea how much water they use and since they pay just a small annual fee for virtually unlimited use, many consume far more water than they need. Secondary water must be metered and charged for appropriately as part of programs to conserve water that is currently being waste. By eliminating property tax subsidies for water, and charging the full

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					cost of providing water in water bills, water consumption can be reduced naturally. Also, water use can be reduced by simply providing water users with data on how much they use each month. Metering secondary water is a common sense option to ensure southwestern Utah is using water responsibly before spending billions of dollars to import water from 140 miles away. There is not justification for building the Lake Powell Pipeline. Washington and Kane Counties, and their municipalities must demonstrate effective water conservation before forcing the other citizens of Utah to pay for a water project that would encourage continued wasting water
Marv	MWP	1038	1134	Alternatives	as has gone on for years and is still reflected in current water policy in southwestern Utah.
Jane	Whalen	1039	1196	Water Supply	The Coalition is concerned that the LPP will further diminish an already over-allocated Colorado River, where existing deficits have not yet been addressed. It would increase the diversion from the Colorado River at a time when existing water supply diversions (as well as ecological needs) already result in a functional deficit due to warming temperatures and shorter winters, leaving less snow melting at the river's source. We are concerned that the project would worsen water deficits for other beneficial uses of the Colorado River and Lake Powell, and it would otherwise cause significant, immitigable impacts on such uses. It has been well-documented by the Bureau of Reclamation (BOR) that there is more water allocated in the Colorado River than the river produces annually, even without considering a warming climate. Yet, the BOR continues to over-allocate the river by selling water to Utah even though there isn't any physical water to sell. The releases from Lake Powell continue to exceed inflows. This over-allocation is draining the reservoirs faster than anyone predicted. The Colorado River has reached its limit, yet plans are underway to take more water for the LPP.
Jane	Whalen	1039	1197	Wilderness	The lead and cooperating agencies are obligated to consider the direct, indirect, and cumulative impacts of the industrialization of the pipeline's corridor to the land designated as the Grand Staircase Escalante National Monument in 1996. These lands are being litigated in the courts and may regain Monument status. We realize that there is an approved right-of-way for the pipeline along the highway. However, the

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					pipeline’s proposed infrastructure will affect the Monument's values by he proposed hydroelectric turbine and pumping stations with power lines connecting them to existing power grids, substations, lights, new access roads, regulating tanks and reservoirs, manholes, blow off valves, fencing, buried forebay tanks, buried surge tanks, (pig retrieval, used to clean the pipe) and surface overflow detention basins. The continued operation, maintenance, repair and excavation of the pipeline would significantly degrade the region’s
Jane	Whalen	1039	1198	Wilderness	wildland pristine character. We are concerned about the damage to the land of building the pipeline, and all needed infrastructure cannot be rehabilitated or mitigated in this arid land. The pipeline will have an irreversible and irretrievable impact on these lands that we think are natural aspects of our National Heritage to be protected for future generations. See 42 U.S.C. 4331.
Jane	Whalen	1039	1200	Water Supply	The current project description does not describe the complete project. Since one of the DEIS’s proposed actions is, in part, to approve a BOR service contract for Utah to buy water for the LPP out of Flaming Gorge Reservoir; the project location is from Flaming Gorge Reservoir to St George, Utah. Currently the project is described only from Lake Powell. Therefore, the direct, the indirect and cumulative impacts on Colorado River Upper Basin’s Green River natural resources are left out. UDWR claims the water for the LPP will come from Flaming Gorge Reservoir and travel 400 miles to Lake Powell and benefit the endangered Green River fishes. It also, does not include the impact of withdrawing water for development of the Green River Block BOR’s service contract and its impact on Green River Endangered fishes (detailed below) that are included in the Upper Colorado River Basin Recovery Implementation Program. BOR and the cooperating agencies must recognize the critical fact that faulty data was used to make this assumption that instream flows will be available for the endangered fishes. We detail the faulty data used by the proponents below. DRWR’s claims that they will provide a certain amount of water for Green River endangered fishes, if they can have the same amount of water out of Flaming Gorge Reservoir (FGR) must be evaluated in DEIS. The Coalition is concerned that the Upper Colorado River Basin Recovery Implementation Program

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					has not evaluated the withdrawal of water in the Green River Block water exchange contract.
Jane	Whalen	1039	1202	Purpose and Need	The proponents have not provided a sufficient purpose and need for the imported water to service population growth in southwest Utah.
Jane	Whalen	1039	1203	Purpose and Need	Also, the real need for water has not been established by the proponents. This need should have been established before the environmental review of the proposed project proceeds. We understand that Utah’s forecasted water demands are based on the Washington County Water Conservancy District’s studies. However, based on our preliminary review, we are concerned that this study is outdated and flawed and generally provides an insufficient basis to support the need for the proposed project. Indeed, conveying water without a proven need risks exacerbating the delicate situation among Colorado River Compact states. We request that the lead and cooperating agencies independently investigate Utah’s assumptions regarding the need to diversify by increasing water supply from the already overallocated Colorado River. Based on our research and review of the studies, we believe that future water demand in the two counties can be satisfied with the expanded development of local water supplies, increased water conservation and improved efficiencies. We provide the data in the alternative section II below.
Jane	Whalen	1039	1205	Purpose and Need	The DEIS should also should evaluate the project purpose in light of likely changes in the Colorado’s hydrologic flow regime, long-term drought-related reductions in water availability, and the sharing of deficits among the seven Colorado River Basin states as defined in the Interim Operation Guidelines that will be in place only until 2026 and will be revisited then subject to the agreement of all Compact Basin states. The Utah Division Water Resources’ (UDWRe) real purpose is to draw its Ultimate Phase Central Utah Project (CUP) water right of 158,890 AFY from Flaming Gorge Reservoir using the proposed water use exchange service contracts with the BOR. For this reason, both service contracts should be considered in this DEIS. An accurate purpose and need statement is important to an accurate and adequate environmental document under NEPA. However, the CUP was designed more 60 years ago and was based on an assumption of a higher annual river flow in the

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					Colorado River that has since been proved to be completely erroneous. We detail that error in our comments below.
Jane	Whalen	1039	1207	Purpose and Need	The importance of having enough water for the project’s purpose was described in FERC study.FERC’s Study plan describes the nexus of water availability to the Project purpose as follows: “[t]he availability of water for the pipeline would affect the ability of the Project to supply water to communities in Utah and to generate power. Therefore, the availability of water supply is directly related to the Project’s purpose.”Therefore, an analysis in the DEIS of water availability for the LPP is critical to the proposed action. (purpose).
Jane	Whalen	1039	1208	Alternatives	The Coalition proposes a water conservation alternative be analyzed as a reasonable alternative in the DEIS. One of the Coalition’s primary objections to this request for the Lake Pipeline Project is that UDWR, after ten years of the study, has not seriously considered alternatives to LPP as a means of providing water for the growing populations in Washington and Kane counties. We contend that there are local sources of water and management options that prevent the need for an expensive and environmentally damaging 140-mile-long pipeline.
Jane	Whalen	1039	1209	Alternatives	Utah already uses more water than conservation-minded communities in the Southwest, and Utah’s conservation targets are arguably minimal. To its credit, UDWR responded to the need for more accurate reporting by revising its estimates of water demand in Utah communities .5 In 2015 Washington County's demand totaled 302 gallons per capita per day (gpcd). However, there is strong evidence that Utah has a propensity to underestimate its ability and its citizens’ willingness to conserve water. In the early 2000s, Utah adopted a 25% state-wide conservation goal for 2025 based on usage in 2000, but by 2010 or so had already reached 18%. Rather than adopt an objective and independent conservation goal, UDWR blithely uses WCWCD’s conservation target for 2060 based on a simple percentage reduction, another 15% from 2015, targeting 237 gpcd.6 Unfortunately, to increase the demand, WCWCD is only counting culinary grade water as a supply when many other water supplies need some minimal treatment. We are asking that the lead and cooperating agencies in their consideration of alternatives gather the facts from independent

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					sources that are objective and unbiased. Elsewhere, conservation-minded Southwest communities typically target 150 gpcd, and that number does not require extraordinary conservation. Indeed, Albuquerque has already reached this level. UDWRe argues that water use in other communities cannot be compared with Utah values because of differences in measured amounts and assumptions. However, UDWRe has made no effort to reconcile or normalize those estimates to see how Utah compares to other places.
Jane	Whalen	1039	1212	Alternatives	In UDWRe’s projections of demand, there is double counting of safety buffers that are used to justify the LPP. Again, UDWRe uses WCWCD values, but bases projected demand on the “high” projections of the service population (490,827) rather than baseline projections (458,960). This projection ignores the fact that birth rates are declining, and UDWRe also includes a 15-Year Planning Reserve intended to protect against “unanticipated variations in supply and demand related to climatic conditions,”
Jane	Whalen	1039	1213	Alternatives	We are asking that the cooperating agencies in there consideration of alternatives gather the facts from independent sources and that they are objective and unbiased.
Jane	Whalen	1039	1214	Alternatives	Elsewhere, conservation-minded Southwest communities typically target 150 gpcd, and that number does not require extraordinary conservation. Indeed, Albuquerque has already exceeded this level. UDWRe argues that water use in other communities cannot be compared with Utah values because of differences in measured amounts and assumptions. However, UDWRe has made no effort to reconcile or normalize those estimates to see how Utah compares to other places.
Jane	Whalen	1039	1216	Alternatives	In UDWRe’s projections of demand, there is a double counting of safety buffers that are used to justify the LPP. Again, UDWRe uses WCWCD values, but bases projected demand on the “high” 2060 projections of the service population (490,827) rather than baseline projections (458,960). This projection ignores the fact that birth rates are declining, ⁷ and UDWRe also includes a 15-Year Planning Reserve intended to protect against “unanticipated variations in supply and demand related to climatic conditions,” system infrastructure failure or catastrophic events,” “delays associated with complex permitting processes,” and “unanticipated population growth”

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					(emphasis added). It doesn't seem reasonable to count the uncertainty of population growth double. It also seems unreasonable for UDWRe to include a 15-Year Planning Reserve for water when the Sand Hollow Aquifer according to USGS has had about 127,000 acre-feet of water seep into the aquifer as of 2014; monthly recharge volumes ranged from 50 to almost 3,500 acre-feet from 2002 through 2014. It is hard to justify the WCWCD asking for a massive block of water from the river but not need it until much later. In the proponent's previous studies on water demand they incorrectly assume this analysis is about water for a certain population however it isn't. This DEIS process is about how to replace the 86,000 acre-feet of water only. We detail the way to get the same amount of water for future growth that does not damage the natural and human environment below.
Jane	Whalen	1039	1218	Alternatives	A. Increased yield from currently identified sources Conserve Southwest Utah (CSU) gave a presentation to the Governor's Executive Task Force in September 2018. This presentation detailed other water supplies that are not being counted as supply by the UDWRe. ⁸ The existing local water supplies outlined in the CSU's presentation reveal in detail the various incorrect assumptions and assertions made to justify the need for LPP water. These include:
Jane	Whalen	1039	1219	Alternatives	B. Appropriate accounting of yield from local sources. Estimates of yield from existing local water supplies should be reviewed by an independent body to assure that they are not artificially limited or underestimated to justify the LPP. For example, WCWCD claims that Sand Hollow and Quail Lake Reservoirs and Sand Hollow aquifer, fed from the Virgin River, can only provide about 30,000 AFY as annual supply to 2060. Elsewhere, UDWRe projects 113,000 AFY Virgin River depletion to 2050—more than triple the claim of 30,000 AFY. This higher amount of water is not identified in future supplies. This higher amount of water is spring high water flows that can be stored in reservoirs. ^{9C} . Inclusion of water rights from private landowners that convert from agriculture to municipal and residential development. We do not advocate the development of agricultural land. Still, we do recognize that wherever agricultural land is converted to other uses, water could be converted to culinary or secondary use. More analysis is required to account for agricultural water, estimate its conversion rate, and determine its treatment costs. ^D . Increased reuse and treatment

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					of abundant brackish water. There are several substantial sources of water considered to be too saline for M&I use. Given the current project cost of the LPP, it would seem wise to review these analyses. E. Increased use of secondary water for yards and municipal irrigation by requiring secondary water lines to be installed to water outside landscaping. Especially given the conversion of agricultural water, and particularly with the high rates of new development, it makes sense to require greater use of secondary water for landscape use. WCWCD claims it has no control over local ordinances, but it can and does have a great influence on local policies on water use. It makes sense to consider updating local landscape regulations to require secondary water lines be installed in new development. The wewcd and state do not include sufficient agricultural conversions in their forecasts. F. Innovations in water management. Other alternatives, metering all water use, include undeveloped city water rights in future supply, rainwater capture, more careful analysis of increased yield and efficiencies from the Virgin River and local reservoirs, and underlying aquifers, used to seem inconsequential in terms of supply. However, these are significant water sources that are being ignored in UDWR's Water Needs Assessment for the LPP.
Jane	Whalen	1039	1220	Alternatives	G. Water Use Pricing to signal conservation. Water budget rates have been shown to reduce water use by 50%10 and pay for themselves over time. H. Better water conservation planning to lower demand. The state water management agencies should use industry-standard planning and management processes to develop plans that are executable and accountable in terms of objectives, tasks, schedules, responsibilities and budget. Existing documents following current UDWR guidance do not contain these basic elements and therefore are neither executable nor accountable. They will not result in significant water conservation, but rather contain background information on infrastructure, current usage and measures that could be taken. Conservation goals should be tied to estimates of future water supplies and what has been achieved elsewhere. Methods to reduce usage should be studied and ranked, and then incrementally implemented in projects that are planned to move us toward the goal in measurable steps.

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Jane	Whalen	1039	1221	Alternatives	In addition, another alternative is Western Resource Advocate’s Local Waters Alternative, ¹¹ which offers a path forward that requires only moderate and incremental conservation efforts and assures adequate water for a healthy and growing population relying only on local sources and actions.
Jane	Whalen	1039	1224	Alternatives	UDWRe claims that a water conservation alternative would cost \$1.5 billion without providing any factual basis for the claim. The cost of WRA’s Local Waters Alternative is estimated by WRA to be about \$410.3 million-plus infrastructure costs. The logic of building the LPP now, spending billions, and taking on substantial interest payments, does not make economic sense. With the Local Waters Alternative, you can pay for the cost as needed as the population grows. It will support, not undermine, long-term economic growth.
Jane	Whalen	1039	1228	Socioeconomics	The DEIS must determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents. The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize how costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this DEIS. ¹²
Jane	Whalen	1039	1230	Alternatives	Moreover, the proponent’s underestimate water supplies and water conservation and efficiencies that would lower the demand for water. While Southern Utah has some of the highest water use per capita in the west and has some of the cheapest water rates. In the DEIS, the cooperating agencies should undertake a thorough evaluation of conservation alternatives independent of the proponents who are biased against conservation being a solution for the needed water supply. It would be less damaging to people and the environment.
Jane	Whalen	1039	1237	Purpose and Need	The widespread presumption that population growth means growing water demand drives much of the politics of water planning in the Colorado River Basin. But it is wrong. Simply we are consistently using less water. In almost all municipal areas served with Colorado River water, water use is going down, not up, despite population growth. We have been getting it wrong for a century.” ¹³ Rene Fleming, the water conservation official for the City St. George, said St George, Utah is using

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					the same amount of water as it did in 2010. She said, in 2010 water use reported on the state’s annual report was about 27,000 acre feet. In 2017 it was about 24,000 acre-feet and population grew from roughly over 70,000 to above 80,000 in the same time period. Vegetative cover has decreased by about 16%. She has a power point slide with an aerial view of a home in 1998 with a lot of grass and a similar sized lot and home in 2018 that is mostly xeriscaped. Therefore, the proponents current claim we are running water needs to be reevaluated in the DEIS.
Jane	Whalen	1039	1239	Water Supply	Yet, state and federal decision makers are not using these diminishing flows in forecasting water availability for the LPP. Unfortunately, Reclamation is supporting more Colorado River diversions even if the water is not physically available- putting communities and taxpayers at risk.
Jane	Whalen	1039	1240	Water Law	Utah allocated all its senior water rights to Utah’s surface water before 1958, the year of the LPP water right. The Central Utah Project has senior rights over the LPP. As water supplies continue to decline, the Wasatch Front will get the water, not the LPP. Therefore, the LPP has no seniority rights to the river, as explained in detail below.
Jane	Whalen	1039	1241	Water Supply	The DEIS should analyze another significant risk that there will not be enough water for LPP. It is the imbalance in Lake Mead between inflows and outflows known as the Lower Basin’s structural deficit. “This means under normal water supply conditions, the rules created by the regions political leaders over the previous century had allocated more water on paper that the river could provide.” ²² Eric Millis, director DWRe gave a presentation at the Utah Water Users Workshop in March 2018 on the structural deficit in existing Compact agreements. The problem is there is more water going out of Lake Mead than the amount of water going into Lake Mead.
Jane	Whalen	1039	1242	Climate Change and GHGs	As a cooperating agency, BLM must take a hard look at climate change on the direct, indirect, and cumulative impacts on humans and ecosystems from a changing climate on annual flows for the LPP in the DEIS. The significant issues to be analyzed in DEIS include: Impacts on the ecosystem from climate change include shrinking water resources, extreme flooding events; invasion of more combustible non-native plant species; soil erosion; loss of wildlife habitat, and larger, hotter temperatures. Many of these impacts have been cataloged in recent studies by federal agencies showing the

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					effects of climate change, mainly in the United States, such as the National Climate Assessment.
Jane	Whalen	1039	1243	Climate Change and GHGs	Secretarial Order 3289 unequivocally mandates that all agencies within the Department of Interior "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." SO 3289, incorporating SO 3226. This falls squarely under this guidance
Jane	Whalen	1039	1244	Climate Change and GHGs	and BOR must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within the DEIS. Further, NEPA regulations require that NEPA documents address not only the direct effects of federal proposals, but also "reasonably foreseeable" indirect effects. These are defined as: indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b) (emphasis added).Therefore, BOR and Department of Interior cooperating agencies are required to take a hard look at direct, indirect, and cumulative impacts to and from climate change in the areas of this proposed DEIS.
Jane	Whalen	1039	1245	Climate Change and GHGs	UDWRe claims that they considered climate change when assessing water availability for the LPP. However, it is not clear how they did this because the hydrological models they used do not consider climate change. The Coalition questions UDWRe's exclusive use of BOR's CRSS, DNF model, and the Index Sequential Method (ISM), because these methods do not account for the impact of a warming climate, nor does the 2007 Interim Guidelines EIS. The models only use the 100-year average of 15 MAFY at Lee Ferry. The Colorado River Compact allocated 7.5 MAFY to the Upper Basin States and 7.5 MAFY to the Lower Basin States. As mentioned above, stream flows have continued to decline due to increasing temperatures. The cooperating agencies could use BOR's available climate models that reflect declining future flows,

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					such as the Downscaled GCM model results in the Colorado River Basin Study, which uses a mean annual flow of approximately 13.6 MAFY at Lees Ferry. ²⁴ If 13.6 MAFY at Lees Ferry is used in modeling UDWR would not have remaining water rights to use for the LPP.
Jane	Whalen	1039	1246	Climate Change and GHGs	Furthermore, the current studies inappropriately exclude an analysis of climate change based on UDWR's unsupported assertion that climate change is not a concern. UDWR claims it will be able to draw water in dire conditions from Lake Powell, but there is no credible evidence on the record that supports this conclusion. UDWR did provide the various climate studies in the Federal Energy Regulatory Commission's (FERC) Study Report but fails to relate these studies to water availability for the project. ²⁷ The statements of UDWR must be supported by reliable scientific evidence in the record, and this evidence has not been provided. Consequently, more accurate information from the updated climate models needs to be included in this DEIS.
Jane	Whalen	1039	1248	Climate Change and GHGs	Moreover, state and federal studies, which have been cited thus far in support of the LPP, have not included study results that have already been undertaken on the variability of future declining river flows. The projected impacts of climate change on the declining snowpack and Colorado River flows are widely accepted within the scientific community, and they should be included directly in planning for future water supplies for the LPP in this DEIS. Also, see the Colorado River Basin Water Supply and Demand Study, which states that the Basin faces a wide range of plausible future long-term imbalances between supply and demand. ³³ Climate variability increases the risk of an already over-allocated Colorado River. Most importantly, climate scientists are warning this may not be a drought-which implies a return to normal precipitation in the future-but actually the start of a permanent aridification due to climate change. In addition, The Colorado River Risk study by Colorado River District should be analyzed in the DEIS. ³⁴
Jane	Whalen	1039	1249	Climate Change and GHGs	The DEIS should address the following primary impacts of climate change on the proposed LPP and water supplies:1. Determine how much water from the Colorado River Basin System will be available to meet Utah's future water need for the

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					<p>Pipeline.2. Hydrology – varies in time, location, and amount. Agreement on how to consider these factors in a water availability study will be essential to gain greater understanding and acceptance of the study concluded. The study for the DEIS should focus on issues in a period of known hydrology and a period extended from known hydrology.3. Water Availability - will include both legal and physical supply considerations. Initially, legal availability will consider current demands.4. Water Use – water use consideration (also referred to as demands) should include existing absolute water rights. Water use can be measured in terms of consumptive use, gross diversions, or total deliveries. Categories of water use include municipal (domestic and commercial), industrial, agricultural, water rights for instream environmental flows, and water rights for recreational in-channel diversions. The Study should examine: 1) how non-consumptive uses within the priority system may affect Utah's ability to develop its consumptive use apportionment fully; and, 2) how much water would remain for nonconsumptive uses if Utah fully developed its apportionment. At various locations within the state, initial water availability should be evaluated using the following formula: Water Availability = Physical Supply - Current Water Use (includes downstream demands).5. The reliability of water supplies, given projected climate change scenarios. This reliability analysis should consider both hydrologic changes and the Bureau of Reclamation’s guidelines for operation of Glen Canyon and Hoover Dams. In addition, the DEIS should address the impact of the proposed project, given projected climate change scenarios, on water-dependent habitat for endangered species in the Colorado River basin.</p>
Jane	Whalen	1039	1251	Climate Change and GHGs	<p>Coalition’s comments on the FACT SHEET:The Fact Sheet does not consider the recent studies that have been released. Even climate model projections in the recent past have proven to be overly conservative; that is, actual impacts have been greater than projected.Comments on the FACT SHEET:From page 3, Looking to the Future: “Modeling conducted by BOR in August 2018, taking into account future water uses in the upper basin including the LPP, indicates a</p>
Jane	Whalen	1039	1253	Climate Change and GHGs	<p>near 0 percent chance of a declared 1922 Compact shortage for the upper basin through the year 2050 presuming hydrology remains similar to what the basin has experienced over the last 100 years”. ? Coalition Comment: This presumption is</p>

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					widely agreed to be invalid. ? From that same section: “On the other hand, if the future hydrology of the basin is similar to the drier, hotter climate change predictions, and more closely resembles the last 30 years, including a period of historic drought, the probability of a declared 1922 Compact shortage rises to less than 13 percent through the year 2050”. ? Coalition Comment: However, it is widely agreed that basing projections in the past 30 years is invalid as climate models indicate continuing aridification. Even discounting that, a 13% chance of shortage is significant, especially if it is a permanent condition. ? On page 3 LPP Fact sheet it states that the: “Modeling conducted by BOR in August 2018, taking into account future water uses in the upper basin including the LPP, indicates a near 0 percent chance of a declared 1922 Compact shortage for the upper basin through the year 2050 presuming hydrology remains similar to what the basin has experienced over the last 100 years. On the other hand, if the future hydrology of the basin is similar to the drier, hotter climate change predictions, and more closely resembles the last 30 years, including a period of historic drought, the probability of a declared 1922 Compact shortage rises to less than 13 percent through the year 2050.” ? Coalition Comment: The recent reports and actions and state’s water use being cut now invalidate the 0 percent chance of shortage in the proponent’s statement in their Fact Sheet. ? From page 4, What if Shortages Occur: “Even if there were an interruption in LPP deliveries due to a Colorado River system shortage declaration, it would be temporary in nature...”. Coalition Comment: There is no basis or evidence for a statement that it would necessarily be temporary. There are many studies that project greater and permanent flow decreases (e.g., Udall, Overpeck (2017) indicating a 17% decrease by 2050 and up to 35% by 2100). We do not see a clear basis for the confidence reflected in the Fact Sheet. We would expect an extremely high supply probability (95+%) would be required before incurring the LPP’s expense and the risk to the state’s citizens and economy.
Jane	Whalen	1039	1256	Cumulative Impacts	In addition to a basin-wide assessment of shortage impacts on the river, the DEIS should carefully assess the effects of additional Colorado River development in Utah and other basin states.As noted above, in the event of long-term reduced system storage, Upper Basin water users may be called upon to curtail water use in

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					<p>satisfaction of the Compact. The Upper Basin states do not yet have formal operating procedures to implement curtailment in the event of a Compact call. Still, the DEIS should develop a series of likely scenarios that project curtailment requirements in each of the states of the Upper Basin. Within Utah, the DEIS must further assess the impacts of the proposed project and curtailment requirements on other in-state Colorado River water users. Because the proposed pipeline is expected to supply municipal and industrial water uses, the DEIS must not only consider the probability of shortages to the pipeline’s water users but secondary impacts, such as how water supply agencies would replace the pipeline supplies in the event of a shortage. Precedent for this approach is found in Reclamation’s Final EIS for Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead, available at http://www.usbr.gov/lc/region/programs/strategies/FEIS/index.html (Colorado Basin Shortage EIS). See id., §§ 4.14.2 and 4.14.3.1. The DEIS should analyze the impact of the proposed project on river flows throughout the Colorado River basin, particularly in those reaches vulnerable to days of “zero flow” and those reaches for which environmental flows have been defined. Specifically, the DEIS should assess the impact of the proposed project on the magnitude and frequency of flows to the limitrophe reach of the Colorado River in Southern Arizona, the Colorado River in Mexico, and the delta region. In addition, the DEIS should assess the impact of the proposed project on instream flows (including mean flows) in the Upper Basin, where such flows have been legally established for the protection of natural and recreational resources. The analysis should also include all areas potentially impacted by shortage conditions in the Upper and Lower Colorado River basin. To the degree that the proposed project increases the probability of Lower Basin shortage conditions, impacts including economic losses and shortage water replacement (including economic costs such as employment, income, and tax revenue, as well as environmental impacts) should be assessed. The DEIS should analyze all of the CRSP projects and other current and planned projects that will have a direct, an indirect or a cumulative effect on Colorado River water use in the region. The list is from Save the Colorado’s web page.³⁶</p>

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Jane	Whalen	1039	1258	Cumulative Impacts	The water projects that should be included in the cumulative impacts in the DEIS include: In Colorado: ? Moffat Collection System Project in Colorado (15,000 acre feet — permitted, challenged in court) ? Windy Gap Firming Project in Colorado (30,000 acre feet — permitted, challenged in court) ? Wolf Creek Reservoir on the the White River in Colorado (? acre feet — hasn't begun permitting yet) ? The San Juan Headwaters Project (? acre feet — local water district voters voted 'no' and sent the money back to the state) ? Irresponsible water use from the Animas-La Plata Project (? acre feet. New diversions will start soon — already built, but needs permits and MOUs for water use) ? Eagle River MOU (30,000 acre feet, not yet started permitting — story here and here). ? Six proposed new dams on the Fryingpan River in the Holy Cross Wilderness. (6,000 acre feet or more) ? A proposed new dam on the Crystal River In New Mexico: ? Gila River Diversion in New Mexico (12,000 acre feet — beginning permitting, Interior nixed some of the funding. future unknown) ? Navajo-Gallop Water Project (36,000 acre feet — pipeline being constructed) In Utah: ? Price River Dam in Utah (? acre feet — Corps halted BOR's permitting process, for now) ? Green River Water Rights Exchange (up to 50,000 acre feet. In litigation.) ? Flaming Gorge Pipeline (55,000 acre feet, water rights application filed which we “protested” in Utah State Water Court) ? Navajo Utah Water Settlement Act, 81,500 acre feet. Bill in Congress. ? Green River Oil Shale (10,000 acre feet/year, challenged in court) In Wyoming: ? Fontenelle Dam expansion on the Green River in Wyoming (~125,000 acre feet — Trump signed bill giving WY the water right. Project has not started permitting yet. Temporarily put “on hold“.) ? The 280-foot-high dam on the West Fork of Battle Creek in Carbon County, a tributary to the Yampa. ? Big Sandy Reservoir Enlargement on the Big Sandy River, a tributary to the Green River. (2,435 acre feet — The “EA” is deficient ? In Arizona in the Lower Basin: The Little Colorado River pumped storage hydropower proposal would dam and flood two miles of the Little Colorado River gorge. — see press release here.
Jane	Whalen	1039	1261	Water Supply	The Lower Basin has senior rights to water in Flaming Gorge and Lake Powell Reservoirs. This puts water for the LPP being taken out of Lake Powell in jeopardy. Utah is ignoring the risk.

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Jane	Whalen	1039	1262	Water Supply	The DEIS must include a chart of the significant water rights in the Colorado River's Upper and Lower Basins by priority date. The DEIS should analyze how the water for the LPP water right would be managed when the Upper Basin and Lower Basin states experience water shortages. The public and decision-makers need to be aware of risk of who will get shorted first after long periods of drought.
Jane	Whalen	1039	1266	Water Law	B. LPP water right is a paper water right that has no value, wet water vs paper water An important aspect of a water right due diligence investigation is determining whether the water is "wet." That is, even if the water right exists on paper, is there adequate water available in priority to satisfy the paper entitlement. Many water rights exist that have little or no value because of their legal and physical limitations. It appears that the LPP water right is one that is a "paper" water right because it doesn't have priority. The proponents have failed to do this due diligence while continuing to spend \$35 million of taxpayers funds to pursue the project.
Jane	Whalen	1039	1269	Water Supply	The two modes of failure for the LPP: physical shortage (Lake Powell is too low) or legal shortage from senior water rights holders or a compact call. A compact call will also prolong a physical shortage, as water that might have been used to recover the reservoir will have to be bypassed to downstream users. The DEIS must analyze if the proponents have the senior water's rights for the proposed action.
Jane	Whalen	1039	1270	Water Supply	Effects of the proposed LPP on the following should be addressed in the DEIS: 1944 Treaty with Mexico; The delivery of water to Lower Basin Colorado River Compact States Water quality impacts on Colorado River and Lake Powell; Effects on Native American water rights should be included in DEIS. In particular, the existing and anticipated future water rights agreements with Navajo, Northern Ute, and other tribes. Native American tribes are becoming increasingly successful in winning their claims to Colorado River water that pre-date the 1922 Compact. Experts estimate that tribes hold between 3 and 5 million acre-feet. As these claims are satisfied before, during, or after LPP construction, less water will be available for the proposed LPP. Lower flows on Habitat loss throughout the Colorado River basin.
Jane	Whalen	1039	1271	Water Resources	Water quality impacts on Colorado River and Lake Powell;

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Jane	Whalen	1039	1272	Biological Resources	Lower flows on Habitat loss throughout the Colorado River basin.
Jane	Whalen	1039	1273	Water Law	The DEIS must reveal who has priority rights to the water in Flaming Gorge and Lake Powell Reservoirs as water continues to decline. Also disclose what priority does that put LPP water right in.
Jane	Whalen	1039	1274	Water Law	The Indian Tribes were not at the table in the 1922 Colorado River Compact, nor in any later compacts and the compacts didn't change or reduce any of their rights. The states have to settle water rights claims with the tribes that have reservations in Utah because Indian rights have to come out of the Utah's remaining 361,000 acre feet Colorado River water right. As river flows decline this could become problematic for the LPP water right because tribal rights have priority over the junior water right of 1958 LPP. Resolving Indian water rights and the other Federal Reserved Water Rights before granting the Ultimate Phase CUP water right would remove significant uncertainty to what Utah's remaining share of Colorado River water should be used for.
Jane	Whalen	1039	1275	Water Law	While some Federal Reserved Water Rights in Utah have been settled many have not. This situation creates the potential for unknown and unquantified Federal Reserve Water Rights to disrupt long established appropriative state water rights if or when the reservation uses are developed even though the rights may have been unquantified, undeveloped, and unrecorded under state water rights laws for decades. Utah has completed Federal Reserved Water Rights settlement agreements on 10 of the 17 National Parks and Monuments and with other federal reservations. But, Arches National Park, Canyonlands National Park and Dinosaur National Monuments, Natural Bridges National Monument have pending Federal water rights claims that are not included in the accounting of Utah's remaining water rights. Rainbow Bridge National Monument is also being negotiated. It is uncertain if National Forest Lands have any Federal Water Rights in the Green River. All of these unsettled Federal Reserve Water Rights need to be added to Utah's remaining Compact allocation before the remaining Ultimate Phase water rights are granted.

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Jane	Whalen	1039	1276	Water Supply	However, BOR's chart in figure 2 shows (below) the natural flow at Lee Ferry is lower than 15 MAFY and is only 12.5 MAFY. 48 Therefore, the physical water is not there for the 15 MAFY compact allocations.
Jane	Whalen	1039	1277	Water Supply	Conserve Southwest Utah made formal GRAMA records request on what water rights exactly is Utah using of its 1.369 MAF allocation, and basically, the state does not know. This puts the claim that Utah has enough water in its allocation for the LPP to trade it with BOR in doubt. The lead and cooperating agencies must validate that Utah has this surplus water in its allocation to trade in the DEIS.
Jane	Whalen	1039	1278	Water Law	A water rights applicant is normally given 5 years to complete the project and place the water to beneficial use when a water right application is approved. However, in 2008 Utah passed a law to accommodate the fact that the LPP 1958 water right, which has not been put to beneficial use for over 61 years. This LPP water right again is set to expire in 2020 because it hasn't been put to beneficial use. The state law Utah Code (73-3-12) allows water agencies 50 years to prove up on their water rights to show beneficial use. This was supposed to create some security to cities that they would get water in the future. But, this is a false promise due to less water being in the system and Utah over allocating its share of the Colorado River. As water supplies continue to decline it is unclear who will be able to use the water for the long term. This issue should be analyzed in the DEIS.
Jane	Whalen	1039	1279	Water Supply	Both the CUP and Ultimate phase water rights depend on surplus high water from lakes, streams, and reservoirs in the Uinta Basin. The planners used the larger amount of annual flow of river water of 15 MAFY to make this decision; that would be enough high water left for the CUP and the Ultimate phase. But now we know the river does not provide that much water. The CUP and the Ultimate Phase water rights are junior because the state allocated all the surface water rights before the CUP was built. There is a question that there isn't enough wet
Jane	Whalen	1039	1280	Water Supply	water left not being used to trade BOR for Ultimate Phase water service contracts. All the high water is going to the CUP or other senior water right holders, such as the irrigation companies. There is not any extra water not being used that Utah can exchange with Reclamation for the LPP. This issue needs to be analyzed in the DEIS.

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Jane	Whalen	1039	1281	Water Supply	The Ute Indian Unit included a pipeline from Flaming Gorge Dam and Reservoir to the Uinta Basin. Because of both engineering and environmental challenges, the Ute Indian Unit was never constructed. Under the provisions of the Ute Indian Rights Settlement, the United States settled with the Ute Tribe of the Uinta and Ouray Reservation for its failure to complete the Ute
Jane	Whalen	1039	1282	Water Supply	Indian Unit. However, Utah wants to give the water to towns in the Uinta Basin and the LPP instead of giving it to the Ute tribe.
Jane	Whalen	1039	1284	Water Supply	The Lake Powell Pipeline water rights total to 86,249 acre-feet of depletion and are held by the Utah Board of Water Resources.” 55 It is unclear how the BOR determined there was that much wet water left over in 1996 from CUP water right to assign such a large amount of water back to Utah. Again, planners used the higher annual flow of the river to be 15 MAFY. We question this assumption that there is any physical water to use and this issue should be analyzed in the LPP’s DEIS.
Jane	Whalen	1039	1296	Water Law	According to a summary by a water official, there are significantly more approved water right applications than Utah’s allocation, which, if developed, could potentially exceed Utah’s entitlement.57 BOR needs to resolve this issue before the LPP’s Contract is approved.
Jane	Whalen	1039	1298	Cumulative Impacts	P. CONNECTED FEDERAL ACTIONS and CUMULATIVE ACTIONS The DEIS must include an analysis of the connected actions that would include the two BOR service contracts UDWRe it is requesting.62 These contracts have to go through the NEPA
Jane	Whalen	1039	1299	Cumulative Impacts	process, but, thus far the geographic scope of these contracts has been left out because the contracted water is in Flaming George Reservoir. Since this BOR service contract is a purpose of DEIS the accurate geographic scope of the project and its impact is from Flaming Gorge Reservoir not only from Lake Powell Reservoir.
Jane	Whalen	1039	1302	General	Utah is proposing two service contracts to utilize its water rights from the Ultimate Phase Central Utah Project of 158,800 AFY and draw the water from Flaming Gorge Reservoir. These water rights have to show proof of beneficial use by 2020 and were undeveloped seasonal unreliable high water rights. However, UDWRe is asking BOR

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					to give them permanent reliable water rights out of Flaming Gorge Reservoir all year long instead. The two service contracts for the of Ultimate Phase of CUP include: A BOR 50-year service contract for Utah to draw out 72,641 AFY from Flaming Gorge Reservoir to use for development along the Green River, known as the Green River Block (GRB). (a portion of application Water Right No. 41-3479). A BOR 50-year service contract to develop the LPP that would draw 86,249 AFY from Flaming Gorge Reservoir, let the water flow downstream about 400 miles to Lake Powell, and then draw water for LPP from Lake Powell. (the remaining portion of application Water Right No. 41-3479). However, the Coalition is concerned that there is not enough water in Flaming Gorge Reservoir for the Ultimate Phase CUP water right. This is due to over-allocation, fewer winter storms, reduced snowpack and stream flows, and the use of a outdated hydrological model. The Effects from the two contracts on the natural resources of the Colorado River must be analyzed in the DEIS.
Jane	Whalen	1039	1304	Water Supply	A. Flaming Gorge Water Right One of the purposes of the DEIS is to approve the State of Utah's request to buy water out of the Colorado River Storage Project's (CRSP) Flaming Gorge Reservoir for the Lake Powell Pipeline. This Federal notice explains the terms of the contract. The Public Federal Notice of Intention to develop an EIS to buy water for the LPP: "UBWR has requested a water exchange contract with Reclamation. Under the exchange contract, UBWR would forbear the diversion of a portion of the natural flows to which UBWR is entitled and allow these flows to contribute to meeting the Endangered Species Act Upper Colorado River Recovery Implementation
Jane	Whalen	1039	1307	Water Supply	Program requirements in the Green River. In exchange, UBWR would deplete an equal amount of water released from Flaming Gorge Dam throughout the year and available at Lake Powell. This exchange contract would not entitle UBWR to call for releases from Flaming Gorge."63 However, UDWR has never disclosed where the water is; it wants to exchange with BOR. Our preliminary research indicates that the Utah Division of Water Rights has overallocated the Green River tributaries, and there isn't any extra high water to exchange for this contract because the annual flow of river has declined and all the high water is being fully utilized.

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					Conserve Southwest Utah did a Government Records Access and Management Act (GRAMA) request to the UDWR a year ago and asked for the specific water rights they are exchanging. Their response thus far is that the records from the UDWR and the Division of Water rights do not agree with each other. The Coalition is concerned the BOR is not considering cumulative impacts on people and the environment because they are using annual flows of the river of 15 MAFY that is much higher than the annual today. The environment consequences will be much different if the current lower annual flows of the river are used. There are already new provisions in the Drought Contingent Plan (DCP) where states are being cut now and asked to reduce their allocated water use. The purpose of the DCP is to leave water in Lake Powell, but, this proposed exchange contract appears to be conflict with that purpose by taking water out of Lake Powell. The cooperating agencies must consider this LPP's withdrawal and its impact on the purposes of the CRSP in the DEIS. Also, the effects on people and the environment with an annual flow that considers a range of climate scenarios. The priority for the CRSP is to have enough water to meet the compact's provision that the Upper Basin states must provide a certain amount of water to Lower Basin states. The proposed contract appears to be in conflict with that goal. Therefore, these contract provisions must be analyzed in the DEIS to clarify who has priority rights to divert water as the water supply declines.
Jane	Whalen	1039	1309	General	However, in the previous 10 years the project has only been studied from Lake Powell to St. George. If the water for the proposed action has to come from Flaming Gorge Reservoir then the scope of DEIS must be from Flaming Gorge Reservoir.
Jane	Whalen	1039	1310	Water Supply	CONTRACT j., Page 3. j. It is not in the United States or other stake holders' best interest to continue to over-allocate the Colorado River. This was also not the intent of Congress and the Laws of River to be selling water that is not physically in the CRSP system.
Jane	Whalen	1039	1311	Water Law	CONTRACT Page 4. 4. TERM The Contract remains in effect for 50 years, although there is no proof Utah will be able to pump water for 50 years using a 1958 junior water right out of Lake Powell. There is nothing disclosed in this Contract regarding

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					how projected lower flows; or lower reservoir levels will curtail use of this water right. This Lake Powell Pipeline water right will subordinate to other senior water rights holders when water flows, or reservoir elevations decline. Utah claims it will be able to divert water in dire conditions in Lake Powell without any facts to justify this position. Its intake structure in Lake Powell withdraws water near dead pool. This Contract provision needs to be clarified and rewritten to specify what restrictions would apply to withdrawing water from Lake Powell as water declines in dire conditions.
Jane	Whalen	1039	1313	Water Law	CONTRACT Page 5. 8. RATE AND METHOD OF PAYMENT How was the rate calculated? It seems the rate of \$19 per acre is low compared to other BOR Contracts. It should be disclosed how the rate was established and what other projects have been charged. Also, what are the costs of the CRSP used to determine the rate in this Contract so the public can judge if the rate is fair; or subsidized by the nation's taxpayers? For instance, the Upper Gunnison River Water Conservancy District Contract No. 04-WC-40010 was charged a much higher rate of \$71.68 per acre foot.
Jane	Whalen	1039	1317	Water Law	This could also be an opportunity to add an escalation clause to the Contract so that as the elevation of Lake Powell go lower the price of acre foot of water should go up. Pricing is a good tool for conservation.
Jane	Whalen	1039	1318	Water Law	This section should describe at what reservoir level Utah could continue to pump water out of Lake Powell and when it could not. Utah claims it can pump water from Lake Powell in dire conditions from near Dead Pool. The DEIS must include an analysis of how the Upper Basin Project Act 602 (a) storage in Lake Powell would restrict pumping below elevation of 3,630 ft when the water is less than 14.85 MAF for the LPP. In the future the entire capacity of Lake Powell will be needed to meet 602 (a) storage requirements; a trigger point should be discussed in this DEIS. Also include an analysis of all the other agreements for CRSP's water in priority order, the Drought Contingency Plan, the Interim Guidelines and the ability to maintain the minimum power pool elevation for power. The DEIS should disclose how senior

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					water rights holders would restrict pumping water for LPP out of Lake Powell and who they are?
Jane	Whalen	1039	1319	Water Law	WATER SUPPLY SHORTAGE There is nothing in the Contract that explains what will happen to LPP water right in a shortage. Such a clause should be included on this Contract.ADD –WATER CONSERVATION There is an opportunity to add a water conservation clause similar to what is in the Contract shown below. Cities receiving water would have to have a comprehensive Water Conservation Plan with firm targets. For Example:
Jane	Whalen	1039	1420	Socioeconomics	In the BOR handout the power point picture titled Pumping Cost Savings Due to Lake Powell doesn't make sense. The illustration shows a full Lake Powell when on the average it is only half full. The LPP intake pipe is estimated to go down to near Dead Pool and that is not shown in the picture. Thus, the picture doesn't represent the proposed project. Utah is trying to show in this illustration if there was no Lake Powell then they would have to pump water from the river itself and this is a saving. The LPP project consumes a lot of power and isn't much of power producer. Please explain in the Contract how there are real cost savings from the LPP. The example used by Utah can't be considered a valid Energy Saving Assessment for the project. When FERC was the licensing agency the Pumped Storage Project and the power it could have produced were used by UDWR to justify the cost of the LPP and provide a positive cost/benefit analysis. Now the project has changed and is a net energy user. The Contract should show how there are real cost savings from the LPP. The example used by Utah in its handout can't be considered a valid Energy Saving Assessment for the project.
Jane	Whalen	1039	1421	Water Supply	The Contract includes many of Utah's unsubstantiated claims. In this 50 year Contract the BOR must address that Utah's share of Colorado River will decline over this 50 year period and also consider: the other obligations that have higher priority dates than the Lake Powell Pipeline water right in a drought along the Green River; also consider that the other Upper Basin states upstream that want to develop their remaining share of the Colorado River; and Utah must address its over allocation of its Colorado River approved water rights.The BOR should complete a 2020

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					Hydrologic Determination for the LPP as to the availability of water under this long-term service contract. This would determine if Utah has any water remaining of its Colorado River allocation to trade. The Contract states the LPP's priority date of 1958 will not change and as described in these comments it is a junior water subject to being shut off as water supplies decline.
Jane	Whalen	1039	1423	Water Supply	The decision makers did not use the current science that water supplies have already declined in the 2006 ROD therefore the decision that there is enough water in Flaming Gorge Reservoir to sell to Utah is not based on the facts. As water supplies decline there will be new federal changes to operation of CRSP projects or to the ESA requirements for the Green River fishes. How will the LPP and Green River Block Contracts be affected by such changes and must be analyzed in the DEIS. This could mean that there is no guarantee the water will be available for the LPP or the Green River Block Contracts over the long term.
Jane	Whalen	1039	1424	Socioeconomics	A provision in the contract says: "This contract is needed to resolve a long standing disagreement between Reclamation and the State regarding use of the water right assigned in 1996." For over 61 years the State of Utah didn't think it had to pay for water because it was rightfully Utah's water. In 2016, the State changed that position and asked BOR for a service contract and will pay annually a sum of about \$19 an acre-foot. The Contract terms need to be analyzed and disclosed in DEIS such as how was the price per acre of water determined.
Jane	Whalen	1039	1425	Water Supply	The "natural flows to which UBWR is entitled" is referring to the Utah apportionment under the existing Law of the River, which assumed the annual river flows which science has conclusively proved do not exist. The same Law of the River established mandatory delivery to California, recognizing their senior water claims. Utah may not be legally entitled to any additional water out of Flaming Gorge Reservoir unless it can conclusively demonstrate that such withdrawals will not reduce the required deliveries to the Lower Basin and other senior water rights holders. The problem with already approving the Green River Block Exchange Water Contract is the same problem we have described in great detail in these comments because there is no wet water for this Contract. The reason BOR determined there

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					are not any effects to the human and natural environment from the implementation of the Green River Block Exchange Water Contract is that BOR assumed the Contract would be fulfilled by using a lot of water that doesn't exist by using the 100 year average for the annual flows.
Jane	Whalen	1039	1427	Water Supply	Therefore, due to the lower annual flows in the river Utah doesn't have any high water tributary flows left to which it is entitled under Article XV(b) of the Upper Colorado River Basin Compact. Utah makes statements it has have the water but doesn't disclose where it is or give any evidence of its existence. The lead and cooperating agencies must require that Utah disclose where this remaining high water is located that it wants to trade with BOR. The proponents using this higher annual flow of the river 15 MAFY that everyone agrees is no longer valid can't be used to evaluate the impacts of the Contract. Due to the lower annual flows of river, it appears from our research that this Green River Block Contract of 72,641 acre-feet water right from the Ultimate Phase of the Central Utah Project (A30414d) is no longer present in the river system. This is due to reduced flows from rising temperatures, over-allocation, and a 1958 LPP water right, which is junior to other senior water rights holders; and unsettled Federal Reserved Water Rights claims of Indian tribes and other Federal reservations. Thus, this is a paper water right that Utah is not entitled to under the Compacts because it is not tied to any wet water. For these reasons, this water right cannot be used for this water rights exchange. In the previous Bureau of Reclamation studies, there was a call for action and a statement that indicated the "apportioned water in accordance with the Law of River exceeds the approximate 100-year average flow of the river of 15 million acre-feet year (MAFY) at Lee Ferry and is 16.4
Jane	Whalen	1039	1428	Water Supply	MAFY."69 "The Basin faces a wide range of plausible future long-term imbalance between supply and demand. This imbalance computed as a 10-year running average ranges from no imbalance to 6 million acre-feet (MAF) with a median of 3.2 MAF in 2060."70 However, these studies by the BOR that illustrate the decline of future water supplies are being ignored in decision making to sell more water in these water contracts. More recent studies have shown that there has been 16.5% less

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					water in the Colorado River the last 100 years. ⁷¹ Therefore, a current analysis should be completed in the DEIS before these service contracts are signed.
Jane	Whalen	1039	1430	Water Supply	However, the conditions in the Colorado River Reservoirs system have changed significantly during the last 15 years since the ROD was completed and the local BOR has not yet recognized the change in its decision making. The circumstances surrounding the operation of the Colorado River system reservoirs have been changing as well. The Coalition is concerned that this hydrological modeling used to determine how much water is left in the Flaming Gorge reservoir's water availability analysis is flawed because it used the 100-year historical average of 15 MAFY at Lees Ferry. However, more recent studies have shown that there has been 16.5% less water in the last 100 years. ⁷³ Therefore, a current analysis should be completed in the DEIS using lower annual flows and a determination who has the senior water rights to the water in flaming Gorge reservoir and how there physically is.
Jane	Whalen	1039	1431	Water Supply	The effects to natural resources from the construction, the operation and maintenance of the LPP must be analyzed in the DEIS.
Jane	Whalen	1039	1432	Water Resources	A. Water Resources Effect of pollution to Navajo sandstone aquifer under the Hurricane's sewer lagoons due to higher levels of water from the LPP. Effects of evaporation above and subsurface infiltration below Sand Hollow and Quail Reservoirs.
Jane	Whalen	1039	1433	Water Resources	Effects of the potential loss of surface water to evaporation above and subsurface infiltration below the proposed LPP pump stations storage reservoirs. ? The potential for subsurface pollution to Sand Hollow Reservoir, wells and aquifer from chemicals used to kill invasive mussels. ? Increased evapotranspiration losses from Quail Lake and Sand Hollow Reservoirs that would occur if the LPP maintains a larger volume of water in these reservoirs than was stored under pre-LPP conditions. Will another reservoir and treatment plant have to be built, and at what extra cost to residents? ? Effects of project construction, operation and maintenance on declining water quality in Lake Powell and in the Green and Colorado Rivers in all downstream sections including through the Grand Canyon as a result from withdrawing low TDS water

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					from near the surface and near dead pool of Lake Powell; ? Effects should include (but not be limited to) Interstate and International salinity control agreements. ? Effects of potential water right claims and disagreements from delivery of Upper Basin water to the Lower Basin as the project does. ? Effects of increased cost of drinking water regulation standards and treatment requirements of pollutants in Lake Powell as the project plans to draw water near dead pool such as arsenic, selenium, uranium and other compounds that would increase operation and maintenance costs over the life of the project. ? Effects of water quality on human health of Lake Powell's chemicals in the water. In addition to reduced storage capacity, scientists have observed increasing concentrations of chemical pollutants in Lake Powell when reservoir levels drop. The DEIS should do an in depth analysis the potential ramifications of increased health risks and drinking water treatment costs associated with low reservoir levels. ? Effect of LPP drawing water below minimum power pool elevation and effect on Pipeline's legal priority to continue to draw water from Lake Powell. ? Effects of the LPP system expanding and being able to tap other aquifers elsewhere in the two counties and in Arizona and move that water via the LPP to other areas. ? Effects of changes caused by the building of the pipeline's infrastructure in hundreds of washes that deliver water to plants and wildlife that will be totally cut off from water.
Jane	Whalen	1039	1435	Water Resources	Effects to flash floods and surface water flow through washes, canyons, and sheetflow across the desert during extreme storm events, so that natural resources on BLM lands are not damaged. Culverts should be described in detail, with respect to size and design, to avoid flood debris clogging, blow-outs, and that could impact adjacent natural resources. Effects on streams, dry washes, springs, seeps, and riparian areas should be mapped, that will be impacted by pipeline's infrastructure should be mapped. All avoidance measures, mitigation measures, and best management practices should be detailed in order to prevent significant impacts to these water resources. Effects of where construction water for the pipeline will come from, and how many gallons or acre-feet per month. Will groundwater be pumped in area wells for use in construction, or will water be trucked in from another source? Effects on ground water due to all the cement needed for the project. A conceptual

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					groundwater model of quantity recharge of springs, seeps, and surface flows within and adjacent to the pipeline should be developed and used as a basis for impact analysis for the proposed project. The analyses of hydrology and water quality need to identify and analyze all of the project's impacts. The DEIS must include avoidance, minimization and if necessary mitigation measures, to offset any impacts.
Jane	Whalen	1039	1436	Water Resources	The Coalition is concerned that to deter quagga mussels, chemicals will have to be applied to water at the pipeline's intake tunnels and at the four pump stations. There will be four booster pump stations with a chemical room that would also have a buried forebay tank, buried surge tanks, (pig retrieval, used to clean the pipe), and a surface overflow detention basin. The LPP pipe size is oversized and will leave space for quagga mussels to attach to the walls of the pipe. There are also questions about whether moving water will even work given that so little water is projected to be needed per year. The cost of maintenance to prevent mussels and protect water quality have not been included in the studies. Since UDWR claims it can draw water near dead pool in Lake Powell, in the DEIS should require an analysis of water quality at these low elevations. Also, the fish in Lake Powell have mercury in their flesh. Therefore, water quality tests for chemicals and mercury should be performed at Lake Powell.
Jane	Whalen	1039	1437	Water Resources	The analysis of the consequences of putting LPP water that has chemicals in it into an artificial aquifer recharge project below Sand Hollow reservoir should be analyzed in DEIS. ? Effects on water quality parameters, including quagga mussel invasion and potential chlorine treatment, on the Virgin River resulting from increased output from the St. George wastewater treatment facility. Effects of quagga and other invasive mollusk species infesting existing water delivery systems within the three counties. Effects on water quality from quagga mussel waste products (e.g. sulfites, sulfates, nitrogen, ammonia, etc.) and decomposition within the LPP and their ability to spread toxic algae causing problems with drinking water supplies. Financial and human health effects of chemical and/or other mussel treatments on water quality parameters in Kane, and Washington Counties. Effect on project design, construction, operation and maintenance activities and costs related to minimizing and managing for possible quagga and other invasive mussel species infestation.

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					Effect on the construction, operation and maintenance of municipal water supply systems in the two counties after possible introduction of invasive mussel species Effect on the operation and maintenance of Sand Hollow and Quail Creek Reservoirs resulting from introduction of invasive mollusk species Effects of quagga mussels and mussel shells entrained in system on pumping, and online hydropower plants and conveyance facilities from Lake Powell and effects to community infrastructure. Analysis of the effects on fish and other aquatic populations of mussel infestations resulting from the LPP as a vector. Effects on pumping costs, conveyance and pressure management facilities resulting from intentional physical and/or chemical removal of quagga mussels from LPP.
Jane	Whalen	1039	1439	Water Resources	Analysis of mussel removal effectiveness at the Hoover Dam and in the Great Lakes region, including the effectiveness of chlorine and other chemical or physical treatments at removing or controlling quagga mussels. Effects of each proposed alternative on the potential proliferation differentials of the mussels in each alternative. Effect of the economic impacts of the mussel on aquatic resources, i.e. loss of species. Effect to recreational fisheries due to population crashes due to mussels. The impact of increasing levels of salinity (resulting from decreased flows in the Colorado River basin) on additional energy used, cost incurred, and greenhouse gases emitted for water treatment. Effects of LPP crossing the Paria River at Highway 89, where there is a proposed LPP drain valve or other drainages. We are concerned that quagga mussels removed from the LPP may get into Paria River or into Kanab Creek at that crossing or in other drainages where the many drain valves will be located. The studies claim the Paria River is mostly dry, but this is not accurate. It always has some water in it.
Jane	Whalen	1039	1442	Cultural Resources	The DEIS should analyze the impact of The LPP will crossing the Indian Tribes' aboriginal territory the length of the proposed pipeline. Many sacred sites may be destroyed. A 250-foot-wide corridor was surveyed for archeological sites. They found 332 sites recorded, 246 sites eligible for the National Register of Historic Places, 86 sites were found not eligible.

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Jane	Whalen	1039	1444	Biological Resources	The DEIS must include clear and measurable success criteria for any proposed revegetation. It should detail all native vegetation and revegetation activities associated with building the LPP to mitigate all construction activities. Only locally-sourced native seeds should be used.If revegetation efforts are proposed to be used as mitigation, the DEIS must include a clear and measurable revegetation plan with success criteria that include a clear and measurable time-frame for establishment, maintenance, monitoring and ultimately a fully functional revegetation site. We are concerned that restoration of the scar on land from building the LPP using plants in these arid lands may not be possible.
Jane	Whalen	1039	1447	Biological Resources	The DEIS must include the vegetation mapping for the proposed project and all proposed mitigation areas, in order for the public and decision makers to be adequately informed of the impacts and mitigation adequacy. The mapping must be at a large enough scale to disclose unique microhabitats. Upland vegetation, riparian areas and other unusual plant assemblages should be mapped at such a scale to provide an accurate accounting of the proposed impacts and mitigation. A half-acre minimum mapping unit size is recommended, such as has been used for other development projects.Current surveys must be included in the DEIS to be implemented and utilized in combination with existing data in order to evaluate the existing on-site conditions. Ongoing seasonally appropriate vegetation surveys and monitoring would also need to be implemented as part of the mitigation and management requirements at least every 5 years.Impacts to specific vegetation types and soil crusts must be mitigated adequately by type. Specific management prescriptions then need to be developed and included in the DEIS to conserve and protect project area resources and where enhancement of resources is necessary for mitigation purposes.
Jane	Whalen	1039	1449	Biological Resources	An Integrated Weed Management Plan for the revegetation should be developed as part of the NEPA process and included in the DEIS, so that the public may participate in reviewing this important document. We are concerned the revegetation of pipeline’s scar on landscape would be impossible without a clear plan to monitor the success of any revegetation.

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Jane	Whalen	1039	1452	Soil Resources	Effect of construction and heavy equipment that would disturb soils and allow invasions of these invasive weeds. Biological soil crusts that are broken up can allow seeds of cheatgrass to get a foothold and increase. The DEIS should describe all avoidance, best management practices and mitigation measures towards halting any increase of introduced plants and noxious weeds. The DEIS must clearly prohibit the introduction of noxious weeds. ⁷⁵ This is especially important because of the nature of these fragile areas that would be hard to revegetate. Effects on Biological soil crusts that are a vital part of current living desert ecosystems, and they function to hold soil surfaces intact in the face of wind and water erosion, prevent dust storms, keep out invasive species such as cheatgrass, retain soil moisture and provide safe sites for seed germination. How would the construction of the pipeline avoid or mitigate the destruction of biological soil crusts? We recommend that soil crusts are conserved, protected, and restored to perform vital functions such as enhancing infiltration, maintaining soil stability, and facilitating plant growth or re-establishment.
Jane	Whalen	1039	1455	Geological Resources	GeologyEffects of proposed storage reservoirs in Kane and Washington Counties on the potential for subsurface recovery through wells similar to Sand Hollow Reservoir. Effects of LPP crossing across the Hurricane Cliffs active faults (e.g. fault lubrication, potential for increased seismic activity resulting from new weight distribution).
Jane	Whalen	1039	1457	Geological Resources	Effects of proposed reservoirs on geologic stability of Hurricane Cliffs, taking into account recent earthquake in 1990 and fractures, fissures, minor faults, breccias and fault gouge in the lavas, limestones, and any other rock types underlying the proposed sites. Effect on ecosystem function resulting from the spread of non-native plant species in all affected areas and on undisturbed wildlands from the LPP's construction and operation.
Jane	Whalen	1039	1460	Noise and Vibration	Aesthetics and Noise ? The noise from building, operating and maintenance infrastructure on wildlife.
Jane	Whalen	1039	1463	Visual Resources	Effects on natural resources from cleaning and maintenance of the LPP.Effects of pipeline's operation and maintenance, and resulting population growth, on the night sky of the two counties.Effects on the scenic landscapes of the Colorado Plateau and the disruption to the visitors' visual experience of remoteness from the imprint of the

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					pipeline’s electric infrastructure. In particular the effect to the Cockscomb, Three Pigs, Grand Staircase Escalante National Monument, and along the pipeline’s highway corridors elsewhere.
Jane	Whalen	1039	1466	Socioeconomics	The DEIS should estimate the direct impact of funding the project on the residents of Washington, and Kane Counties. The DEIS's analysis should also estimate the impact on residents and taxpayers if an economic downturn occurs and population growth slows. The cooperating agencies should consider whether state or federal funding would be available (to mitigate the burden of impact fees on project beneficiaries), and how the net benefits of the project may vary depending on funding source. ⁷⁶ It is foreseeable that the pipeline, like other large government projects, may exceed its budget. The cooperating agencies can guard against that by ensuring that the costing methodology is fair, objective and comprehensive.
Jane	Whalen	1039	1468	Socioeconomics	The WCWCD stated that impact fees, property taxes, water rate fees and surcharges are the funding sources that will cover the cost of the pipeline. In the DEIS, the cooperating agencies should provide a thorough assessment of funding sources and a “back up plan” in the case that impact fees do not cover most of the costs of construction. Furthermore, if water rates and surcharges increases on existing residents will be used to fund the project, the cooperating agencies should, in coordination with the independent sources, provide a detailed description of the ratemaking process to increase the fees needed to pay back the state for the LPP. The cooperating agencies’ role is to ensure there is reliable cost data in DEIS for the public to review.The DEIS should analyze the following:A study on costs over the long-term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure must be completed. The health hazard of putting chemicals in the water at every pump station along the pipeline must be analyzed. We are concerned that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, consider the risk of infestation to the Virgin River system.The effect of higher impact fees and other fees on housing costs Estimated total project costs prorated to each Water Conservancy District Comparison of total project cost to total population in each Water Conservancy District service area to a

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					conservation alternative. Estimated debt burden per capita. While the WCWCD claims the pipeline can be paid by the population growth about fifteen years later. This assumes it will still have the right to divert water out of Lake Powell in fifteen years, which is questionable. Effects on pipeline's financing if annual growth rates do not reach the predicted rates. Not everyone needs a water hookup and most people buy an existing home. Therefore, the need for more water should not be tied to just population growth. Effects of increased WCWCD impact fees and surcharges on performance and nationwide competitiveness of the residential housing and commercial real estate market in the two counties. The DEIS should evaluate whether fees, surcharges, and taxes for the Pipeline could inflate the cost of housing and thereby cause declines in population growth especially among service providers (such as school teachers, police, fire fighters). The DEIS should evaluate whether subscribing Counties could lose their competitive advantage to other similar southwestern communities with lower taxes and
Jane	Whalen	1039	1469	Socioeconomics	fees. The DEIS should evaluate whether these negative results could be avoided by pursuing less expensive local water sources, recycling, and conservation. Effects of increased impact fees, surcharges and property taxes on the ability of the Counties and local governments to impose fees, surcharges, or taxes to pay for other services (e.g. roads, sewers, libraries, etc.) needed as a result of growth induced by the Pipeline. The effects on operation and maintenance costs resulting from reduced flow and the incremental expense of pumping water as the elevation of Lake Powell rises and falls. For example, what would the added cost be if Lake Powell is less than 50% full more than 50% of the Pipeline's projected lifetime? What added costs would occur when electricity for the pumps doubles, triples or quadruples in price by the time of construction in 2030? Fiscal effects if the LPP is unable to deliver the expected amount of water due to severe sustained drought, climate change, or conflicts among the Compact Basin states. Effects on cost of electricity to residents resulting from increased regional grid demand for LPP pumps. Effects of LPP-related cost of living increases in the two counties, e.g. increased cost of locally purchased and provided goods and services due to increased community wide tax burden. Effects of LPP-related increases in felony crimes in the two counties based

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					on established crime trends in the Southwest associated with population growth. Effects of the LPP on the State's ability to maintain high bond ratings. Incremental cost-effectiveness of different water supply scenarios. Utah's preferred action alternative assumes that the full allotment of water will be delivered by the LPP and makes no reference to impacts that could be caused by a reduction of water delivery due to drought sharing. Since the cost-effectiveness of the Project (both revenues and associated costs) appears to be related to the amount of water supplied, the DEIS should evaluate the incremental cost-effectiveness of different supply scenarios.
Jane	Whalen	1039	1470	Socioeconomics	Effects of recent increases in the costs of fuel, steel, cement and other construction materials on the estimated cost of Pipeline construction. Utah's past estimates appear to omit many cost items, including fuel, transmission lines, rights-of-way, extending the pipe from Lone Rock Bay to the Colorado River mainstem and the new power upgrades that would be required at Glen Canyon Switch Yard because there is not currently enough power there to run the pumps. The proponents would have to arrange with WAPA to buy power and upgrade the switch yard. The DEIS should include all relevant cost items and should forecast to 2030-2040, allowing time for possible project delays.
Jane	Whalen	1039	1471	Recreation	The EIS should analyze the following: Effects of project construction, operation, maintenance and change in land use on dispersed recreation in the two counties and within the sight of visitors along the proposed routes across the Arizona Strip, Grand Staircase-Escalante National Monument and elsewhere. Effect on the region's wildland character resulting from the pipeline's electrical infrastructure. The LPP would cross through spectacular landscapes and ecologically important wildlands, the Glen Canyon National Recreation Area, the Grand Staircase-Escalante National Monument, pass near proposed wilderness areas and two BLM Areas of Critical Environmental Concern, and the Arizona Strip wildlands to reach St. George, Utah. Five proposed hydroelectric turbine stations and four pumping stations with power lines connecting to existing power grids, substations, access roads, regulating tanks and reservoirs, manholes, blow off valves, fencing, continued maintenance, repair and excavation would significantly degrade the region's wildland character. The Arizona

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					Strip, after all, is known as the place “Where the West Stays Wild.” and is managed by BLM to retain its remote landscape character.
Jane	Whalen	1039	1472	Socioeconomics	BOR has some guidance on assessing the economic value of protecting the scenic beauty of landscape for future generations and should be analyzed in the DEIS. The proposed Lake Powell Pipeline will destroy the scenic beauty of the pristine landscape by scarring the highway corridor all along the highways.
Jane	Whalen	1039	1473	Socioeconomics	The scenic beauty of our public lands in Washington and Kane counties are worldrenowned and drive our economies, providing thousands of jobs in hospitality and tourism. The visitors driving to different National Parks, Tourists are visiting the National Parks and Grand Staircase Escalante Monument and driving on these highways and would be directly adversely impacted by the building of the LPP and all of its infrastructure that would have to be built to support it, such as pump stations, new powerlines and roads. There is a transition happening in Utah to a future grounded in tourism and outdoor recreation, an industry that provided 110,000 direct jobs and \$3.9 billion in wages in the state of Utah in 2017. This needs to be considered in the DEIS. The Coalition feels this corridor has much more value to the State as scenic open space and should be protected from projects like the LPP that would degrade the scenic beauty of southern Utah.
Jane	Whalen	1039	1474	Air Quality	L. Air QualityThe DEIS should analyze the following:Effects of Pipeline project construction, operation and maintenance on regional haze. This includes the potential of effects from PM 2.5, PM 10, mercury, particulates, ozone and other regulated pollutants. The sources could include dust from construction activities, population growth-induced air pollution from increased number of automobiles, particulates resulting from new local power sources associated with the Pipeline, or increased use of existing power sources (e.g. St. George City’s diesel generators).
Jane	Whalen	1039	1476	Climate Change and GHGs	M. Energy IssuesThe DEIS should provide a thorough analyses of electricity needs, greenhouse gas emissions, electricity costs, and the risk of climate change over a fifty-year time period described in detail below. In these analyses, the cooperating agencies should provide independent estimates for energy use and energy generation; the analyses should not only estimate net energy demands. The cooperating agencies

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					should analyze these elements independently of the proponents to eliminate any bias.N. Energy Use The DEIS must assess four elements of energy use: Total (annual) electricity use;Projected temporal patterns of electricity use and generation, including time of day and year;The anticipated source of the power for pumping stations; andThe electricity use of water supply projects that will be developed throughout the Colorado River basin to mitigate the shortages caused by the proposed project.The impact of declining reservoir water levels on additional electricity needs for pumping water from Lake Powell into the proposed Pipeline. This analysis should include additional costs and greenhouse gas emissions. The DEIS should provide an estimate of annual electricity demands throughout the fiftyyear period of analysis. The lead and the cooperating agencies' analysis should estimate when
Jane	Whalen	1039	1477	Climate Change and GHGs	the pipeline would operate at full capacity, and projected water deliveries and power demands in preceding years.In addition, the DEIS should specify what time of day and year the pumping plants would require electricity, for several reasons. The timing of electricity use directly impacts the type of power (and fuel source) demanded by the Pipeline, the cost of electricity, and greenhouse gas emissions. The DEIS should also specify the source of electricity. If electricity will be acquired from electric utilities, the DEIS should note which utilities, and whether those utilities have capacity available on their systems to meet the new load. The DEIS should specify the anticipated source of new power – i.e. coal, gas, solar, or wind power. Finally, the DEIS should identify water supply projects that are being developed to mitigate shortages in the Lower Colorado River basin (such as brackish and ocean water desalination plants), identify electricity demands of these water supply projects, and in particular identify the portion of these projects and their electricity use that would be used to mitigate for shortages induced by the proposed Pipeline.As described in the past reports, the proposed pipeline pumping system would consume more power than it would produce now that the Pumped Storage Project has been removed from the project scope. The DEIS should account for the estimated power to be consumed and power to be produced in terms of MW hours, gigawatt hours and the size of power plant (in MW and MW hours) that would be needed to run the

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					pipeline’s pumps. This power demand accounting should be identified separately from any hydropower that would be produced.
Jane	Whalen	1039	1478	Climate Change and GHGs	O. Greenhouse Gas Emissions For each proposed alternative, the DEIS should assess annual and cumulative greenhouse gas emissions. Greenhouse gas emissions should be calculated based on the source of the electricity. For example, if the pipeline in any way contributes to the construction or expansion of a fossil fuel power plant – even if it is constructed by an independent electric utility – the GHG emissions estimate should reflect the emissions associated with a coal plant, not the average rate of emissions from the electric grid.
Jane	Whalen	1039	1479	Socioeconomics	P. Operations Costs The annual operations cost estimates provided in the DEIS should specify the cost of electricity for operation. The analysis should distinguish between the cost of power consumed by the Pipeline and revenues from power generated by hydropower facilities in the Pipeline. It should not be limited to only the net electricity costs. The hydroelectric power produced by the Pipeline will not meet the project’s entire pumping needs, and will likely have to be purchased from the electric utilities at peak price rates. The price of electricity purchased by the pipeline could fluctuate; in order to provide a thorough analysis, data on price rates should be provided. The DEIS also should identify a range of projected costs of electricity (in c/kWh) for the analysis. Specifically, in 2006, the industrial price of electricity was 4.21 c/kWh in Utah, 5.69
Jane	Whalen	1039	1480	Socioeconomics	c/kWh in Arizona, and 8.03 c/kWh in Nevada. ⁷⁹ They have gone up since then. The initial cost of electricity for the project should fall within this range, and should reflect the likely source of the power (e.g. a gas plant in Nevada or a coal plant in Utah). Many factors influence the price of electricity; the DEIS also should assess costs using a range of electricity price escalation rates. We recommend performing the analysis using annual escalation rates of 1%, 2%, and 4%.
Jane	Whalen	1039	1483	Biological Resources	The DEIS must analyze how the construction, operation and maintenance of the LPP meets the goals of Arizona Strip’s RMP. The Arizona Strip, after all, is known as the place “Where the West Stays Wild ” and is managed by BLM to retain its remote landscape character. The DEIS should analyze the following: Effects of project

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					construction, operation, and maintenance on terrestrial resources specifically located within the Kanab Creek Area of Critical Environmental Concern and elsewhere. Direct and indirect effects on local bird and wildlife populations and habitat as a result of habitat alteration and loss. Analysis of these effects should include the full geographic scope of the proposed project including all developable land proposed to directly or indirectly receive water from Flaming Gorge Reservoir. Habitat alteration and loss directly associated with Pipeline construction would be an insufficient geographic scope due to the Pipeline's cumulative effects. ? Effects of project construction, operation, and maintenance on the migration corridors for birds, the Kaibab deer herd and other wildlife species. ? Cumulative fragmentation effects on terrestrial resources, including birds and wildlife, due to road building, electric infrastructure and other development facilitated by the new supply of water to undeveloped areas of the Arizona Strip and rural or remote regions of the two counties. ? Effect of the LPP's pumping noise on birds and wildlife and their migration corridors and the recreational experience. ? Effects of seasonal construction periods to minimize potential impacts to migrating wildlife or nesting avifauna.
Jane	Whalen	1039	1484	Soil Resources	Effects of perennially moist soil on LPP connecting structures at the Paria River and Kanab Creek stream bed crossings. The Quail Creek Pipeline has experienced extensive leaking problems at the Virgin River crossing. This has causing several environmentally destructive streambed excavations. The DEIS should identify a management protocol for leaks at river crossings and on the land as well as identify appropriate mitigation measures if damage occurs.
Jane	Whalen	1039	1485	Aquatic Invasive Species	Effects on water quality and aquatic ecosystems resulting from quagga mussels and the chemical or biological treatment of mussels, and the potential for spread of mussels to pristine or nearly pristine drainages into Grand Canyon National Park via the LPP route through the Paria River and Kanab Creek stream beds and elsewhere.
Jane	Whalen	1039	1487	Biological Resources	Effects on aquatic ecosystems from pressure, cleaning, regulating reservoirs or accidental releases of water from the LPP at variable clean outs into drainages with perennial, ephemeral or intermittent natural waters.

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Jane	Whalen	1039	1488	Areas of Critical Environmental Concern (ACEC)	The BLM has determined that an amendment to the Arizona Strip Field Office (ASFO) Record of Decision and Approved RMP (2008) in Coconino and Mohave Counties, Arizona (Project) would be required to correct conflicts identified between the management prescriptions for the Kanab Creek Area of Critical Environmental Concern (ACEC) and the designated Regional Utility Corridor No. 113-116, as well as to accommodate a portion of the proposed Lake Powell Pipeline project (LPP project) that crosses the ACEC. Important natural values of the Kanab Creek ACEC and other fragile natural resources of the Arizona Strip may be adversely impacted from the building of the LPP and should be included in the analysis of the direct, the indirect and the cumulative effects in DEIS. The DEIS should analyze the following: A. Relevance and Importance According to the 2008 Arizona Strip RMP, the 13,148-acre Kanab Creek ACEC's "Relevance and Importance" values consist of "significant, regionally important cultural resources vulnerable to vandalism and impacts": The riparian area is a natural system that includes rare, endemic plant communities and suitable unoccupied habitat for endangered SW willow flycatcher. It has regional significance. The riparian area is fragile, irreplaceable, and unique and is vulnerable to adverse change. Cause for concern is dewatering, loss of habitat due to development, flooding, and alteration of the stream channel... Significant lands of regional importance containing wilderness characteristics with a high degree of naturalness, outstanding opportunities for solitude, and opportunities for
Jane	Whalen	1039	1491	Areas of Critical Environmental Concern (ACEC)	primitive and unconfined recreation (BLM 2008:Appendix H, Table H.1, page H-2; emphasis added). B. Wilderness Characteristics Protecting wilderness characteristics on the Arizona Strip remains a major concern with conservationists. In years past, we have proposed a total of 1,106,910 acres in 43 units of Arizona Strip BLM-administered land for eventual designation as wilderness (AWC 2002, 2003, 2006; AWC et al. 2006). The BLM presented substantially less "Lands with Wilderness Characteristics" acreage in several iterations of land management planning ranging from 554,187 acres in the Draft RMP/EIS (BLM 2005:Table 2.10) to 287,853 acres in the recent final resource management plans. The Arizona Strip Field Office (ASFO) lands fell from 46,135 to 34,942 acres. Upper Kanab Creek (the current ACEC) was supported for wilderness in the 2005 Draft RMP, but not in the 2008

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					<p>Final (BLM 2008: Table 2.09). Consequently, any additional reduction or impairment of wilderness characteristics and related values within the Arizona Strip FO is disconcerting to say the least.</p> <p>C. Cultural Values The Kanab Creek Watershed encompasses Kanab Creek, which flows south from the Pink Cliffs of the Paunsagunt Plateau to its confluence in Grand Canyon, and is the Paiute’s traditional “entrance” into that vast canyon. Kanab Creek falls within the traditional territory of the Kaibab Band of the Paiute, who farmed along the creek and utilized the various available plant and animal resources. It was also an important north- south trade route and served as a refuge for Paiutes during European-American encroachment. The intermittent drainage is composed of public lands administered by BLM’s Kanab and Arizona Strip Field Offices, the Dixie and Kaibab National Forests, as well as Grand Canyon National Park.</p> <p>D. Wildlife Connectivity Our concerns lie with, not only the impact of the Lake Powell pipeline on an existing ACEC, but also the adverse effects the pipeline imposes on wildlife habitat and connectivity. The AZFO comprises a crucial component of a significant wildlife linkage between Grand Canyon National Park and the adjacent Kaibab National Forest leading through Utah’s Grand Staircase-Escalante National Monument (GSENM) up to the Paunsagunt Plateau—the Bryce Canyon National Park region. The corridor’s connectivity function is well documented by Arizona and Utah state wildlife agencies (Carrel et al. 1999). This area serves as a critical wildlife migratory movement area between the Arizona’s Kaibab and Utah’s Paunsagunt Plateaus (Carrel et al. 1999).</p>
Jane	Whalen	1039	1493	Biological Resources	<p>F. The DEIS must reflect a Comprehensive Strategy Federal agencies have the opportunity, in many cases the responsibility, to cooperate and coordinate interagency wildlife connectivity management. Any comprehensive strategy for conserving biological diversity requires maintaining habitat across a variety of federal and statemanaged lands, as well as cooperating private landowners. To put connectivity into a broader context, ecological networks result from the interaction of species and ecosystems at a largelandscape scale. Functional ecological networks that conserve biodiversity and provide for sustainable use of natural resources should be the goal of conservation and land management efforts. The ecological network concept embodies several key elements: (1) conservation core areas [e.g, Grand</p>

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					Canyon-Parashant, Grand Staircase-Escalante and Vermilion Cliffs National Monuments, and Grand Canyon, Bryce Canyon, Capitol Reef, and Zion National Parks]; (2) corridors and linkages; (3) buffer zones and sustainable use of non-conservation lands; and (4) the inclusion of human cultural and socioeconomic factors along with the consideration of wildlife needs, such as rural communities that coexist with wildlife. An ecological network is a coherent system of natural or semi-natural landscape elements configured and managed with the objective of maintaining or restoring ecological function as a means of conserving biodiversity while also providing appropriate opportunities for the sustainable use of natural resources (Bennett 2004).
Jane	Whalen	1039	1494	Biological Resources	H. The decisions made in the DEIS must use the Best Available Science The Department of Interior (DOI) is clearly required to implement a policy of using the best available scientific information (BASI) for planning documentation, a principle foundation for establishing wildlife corridors.
Jane	Whalen	1039	1496	Biological Resources	J. In the DEIS the impact of the LPP cutting through a Wildlife Corridor that Links the Kaibab and Paunsagunt Plateaus must be analyzed. In our comments to the GSENM planning staff regarding the notice of intent to prepare a resource management plan for the Monument (BLM 2018d)), we outlined the agency's wildlife connectivity responsibilities as presented above (Wildlands Network and Grand Canyon Wildlands Council 2018). We also suggested goals and objectives specific to wildlife connectivity: Designate wildlife corridors so they contain sufficient ecologically effective habitat to facilitate wildlife movement for daily, seasonal or long-term needs in a relatively safe manner (modified from BLM 2012:2-55). Maintain functioning wildlife habitats and migration and dispersal corridors that allow free movement and use of habitats (BLM 2008:2-45,47). Manage area to conserve crucial habitats and protect migration and movement routes for mule deer, other big game, and other wildlife, such as carnivores (modified from BLM 2015d:881; Section 4-49.2).
Jane	Whalen	1039	1498	Biological Resources	Our management and special designation recommendations presented above are consistent with, and in fact reinforce, federal wildlife responsibilities, including the

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					direction specified by Secretarial Order 3362. We urge BLM (Arizona Strip and Kanab Field Offices (ASPO), and GSENM) to carefully consider these sensitive wildlife areas in amending the RMP to allow for the pipeline and to explicitly identify, both spatially on maps and described in written form through the planning process (including any Resource Plan amendments for the ASPO and Kanab Creek ACEC).
Jane	Whalen	1039	1499	NEPA Process	The Coalition has been concerned about the project for ten years now. The proponents make statements in studies without any evidence of the facts to support their claims; therefore their studies are incomplete. It has been a decade or more since the data was collected for some of the Federal Energy Regulatory Commission (FERC) studies. This affects their reliability and the credibility for use in the DEIS. If a FERC study is used for this DEIS the lead and cooperating agencies must verify that the information is current, accurate and unbiased. The lead and cooperating agencies in the DEIS must also include the findings and recommendations from the current Reclamation studies using: the current science on climate change, the Utah state audit on water need projections, and the recent Division of Water Resources reports on the higher conservation potential and consider all water supplies in Kane and Washington Counties that could be treated. In an effort to show lower water supplies the Washington County Water Conservancy District only considers available grade culinary supply in their study of the need for the LPP. The Coalition is concerned that there are gaps in the current studies that will interfere with preparation of the DEIS. The cooperating agencies should use facts gathered from independent sources for the DEIS. The information provided in the FERC studies in some cases completely left out critical data. Without complete information decisions based on the DEIS will be fundamentally flawed.
Jane	Whalen	1039	1503	NEPA Process	For example, the LPP project’s analyses, projections, and estimates have changed over time and continue to evolve even now. The need for water is lower, and the LPP project water may not be needed by or much after 2030—certainly not by 2020, as previously asserted by Utah in the study reports. There is very little clarity, much less certainty, in previous claims about: the need, the project cost, water availability, water supply, and desirability of conservation measures. It is of utmost concern that current data in UDWR’s studies be updated and made available to those who want a detailed

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					and thorough understanding of this project, so that informed decisions can be made in the DEIS.
Jane	Whalen	1039	1504	Alternatives	These significant issues need to be analyzed in the DEIS include:1. A reasonable conservation alternative we detail in our comments, similar to the Local Waters Alternative that addresses a wider range of water supply sources.
Jane	Whalen	1039	1505	Climate Change and GHGs	A new climate change study must be analyzed in the DEIS that considers the direct, the indirect and the cumulative impacts of various climate projections on the annual flow of the river at Lees Ferry. The direct, the indirect and the cumulative effects to humans and ecosystems would be very different depending on the flow.
Jane	Whalen	1039	1506	NEPA Process	Since the purpose of the DEIS is to approve a BOR service contract for Utah to buy water for the LPP out of Flaming Gorge Reservoir the geographic scope for the DEIS must be from the Flaming Gorge Reservoir to Sand Hollow Reservoir, which includes the direct, the indirect and cumulative effects on the Green and Colorado Rivers.
Jane	Whalen	1039	1507	Water Supply	Analyze as water resources in the CRSP's reservoir system declines who has seniority to use the water that remains in the Flaming Gorge and Lake Powell reservoirs?
Jane	Whalen	1039	1508	Socioeconomics	Analyze the risk of economic disruption that UBWR can't divert any water out of Lake Powell Reservoir and therefore the state doesn't have water to sell to pay for the debt.
Jane	Whalen	1039	1510	NEPA Process	Include the two BOR service contracts for Utah's Ultimate Phase CUP water rights for 158,800 AFY out of Flaming Gorge reservoir in the DEIS because they are in fact a connected federal action.
Jane	Whalen	1039	1512	Water Supply	Disclose where Utah's high-water rights in the Green River tributaries of 158,800 AFY it wants to exchange with the BOR for the same amount of water out of Flaming Gorge Reservoir for the Ultimate Phase CUP water right, (which includes water for the LPP to complete the proposed action) is located Utah just claiming it has the water supplies to trade for these contracts is not sufficient.

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Jane	Whalen	1039	1513	Water Law	An analysis of how the proposal to divert water from Lake Powell is in accordance with the Law of the River to effectively operate the project over the term of license. According to the Colorado River Compact, Utah's Upper Basin water rights cannot be used in the Lower Basin, where the project is located. Also, the goal of the Colorado River Storage Project is the Upper Basin reservoirs are to assure water for the Lower Basin. Also, what federal legislation will have to be passed to allow for this to occur?
Jane	Whalen	1039	1514	Water Law	An analysis of Utah water laws and what laws would have to be changed in order to leave water in the Green and Colorado rivers for 400 miles for an instream flow for the benefit of the endangered fishes from Flaming Gorge reservoir to Lake Powell.
Jane	Whalen	1039	1515	Water Supply	Determine the river's safe yield for the long-term permanent water project, by using a Hydrological Determination that uses less than the historical 100 year average of 15 MAFY at Lee Ferry. This could determine if Utah has a sufficient water supply for the Lake Powell Pipeline. See information on a Hydrological Determination for the Jicarilla Navajo reservoir service contract. ⁸⁰ An analysis of the sufficiency of the concept and plan for providing water for the LPP if senior water rights use all of Utah's recalculated Colorado River allocation that considers the high probability of long-term Colorado River declining flows.An analysis of the probability that the LPP's water right is highly secure for a permanent water project.
Jane	Whalen	1039	1518	NEPA Process	The Coalition is asking that the lead and cooperating agencies be objective and unbiased in gathering all the facts for consideration independent of the proponent's information. Also, the lead and cooperating agencies must require that the proponents to provide clear and concise evidence that they have the senior water rights necessary for a permanent water project.The DEIS must be prepared with a sufficient level of analysis so that the decision makers and the public are able to make a decision on the project's environmental consequences. For ten years the proponents have ignored analyzing all the water sources available and cheaper alternatives that are less damaging to environment as we detailed in our comments. We are asking for the lead and cooperating agencies to do an unbiased analysis of the project using scientific information and not have it be a political decision as decisions

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					about allocating the Colorado River have been about for all these years. The environmental consequences of the project would be very different if you use less water for the annual flow of the Colorado River. NEPA obligate federal agencies to provide high quality information including accurate scientific analyses that have scientific integrity.
Jane	Whalen	1039	1521	Water Supply	The continuation of overallocating the Colorado River by the BOR without regard to the 40 million people, businesses and ecosystems that rely on the Colorado River that are using every drop now must be considered in this DEIS.
ruth	ann horvath	1040	1522	Opinion - Opposed to Proposed Lake Powell Pipeline	I do not support the Lake Powell Pipeline Project and am in total support of the Conserve Southwest Utah's ideas about the project.
ruth	ann horvath	1040	1524	Socioeconomics	The high cost of the pipeline will burden the residents of Washington and Kane County. It is not fair to dump this burden on residents without accurate figures about what the cost will be. Residents have a right to know what expenses are ahead for them. A lot of people here have been asking about the cost? Why haven't these questions been answered.
Jennifer	Wischmeyer	1041	1526	Visual Resources	In reviewing the 2016 Final Visual Resources Study for the Lake Powell Pipeline Project (LPPP), there is a concern within our community that the study did not adequately evaluate a specific segment of the Electric Transmission System Power Generating Alignments (ETSPG), where the Sand Hollow to Dixie Springs 69 kV Transmission lines would be routed in the proposed alignment.
Jennifer	Wischmeyer	1041	1527	Visual Resources	The BLM Field Office Visual Resource Management Goals in the study mandate that "All projects must be designed to be unobtrusive and must follow their procedures". It states that public lands must be managed in such a way as to preserve scenic vistas that are deemed most important according to a list of criteria: "Impact on quality of life for residents and communities in the area" is the first criteria on that list. Since the sections of Dixie Springs in the pathway of the proposed transmission line route did not yet exist when the environmental studies were completed, this means that the

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					quality of life for the future residents and the impact on our community was not considered in the studies. It would seem a regular course of procedure that the environmental study participants would have, or should have, checked with the county for any recorded property development documents that should be considered to avoid moderate to severe impacts on a community. If the transmission lines had been present at the time when Dixie Springs was developed, the home buyers here would have had a choice of whether to live in the vicinity of overhead transmission lines, and we would have had the luxury of discounted home pricing.
Jennifer	Wischmeyer	1041	1529	Visual Resources	In the Final Visual Assessment Study Report, the last Visual Assessment Unit (VAU), #21 is located at Sand Hollow Reservoir, and the last Key Observation Point (KOP), is located on the west side of the reservoir. In the study's Visual Resource Methodology Rating System, it describes that the impact evaluations were conducted "from KOP's within the project area". Also, throughout the categories of focus in the studies, the rating systems are based on visual impacts "as seen from the platform" and the visual impact assessments are localized to the VAU and KOP at Sand Hollow. The Dixie Springs area cannot be seen from the KOP at Sand Hollow due to terrain drop off. Consequently the direct impacts from the ETSPG in the middleground (distance qualified as .05 to 5.0 miles from the KOP), of this VAU are rated at Low to Very Low. The report states that this alternative would not attract attention from the natural setting because of the negligible change that would be created in the foreground or middleground and that the components would be visually subordinate in the setting. Again the community of Dixie Springs was not visible from the viewing platform and homes were not yet constructed although the plats were available on record.
Jennifer	Wischmeyer	1041	1531	Visual Resources	The visual assessment studies contain thorough descriptions and photographs of the terrain along the other proposed alignments. However there are no photographs or descriptions of the area beyond Sand Hollow Reservoir to Dixie Power Substation 51 along which the community of Dixie Springs now exists. Now that we are here, the citizens of this community deserve recognition of how devastating the installation of power poles and lines straight through our beautiful community would be for us.

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Jennifer	Wischmeyer	1041	1532	Alternatives	We have studied the project maps and transmission alignments in the LPP proposal, and have found two practical alternative alignments for the Sand Hollow to Dixie Springs Transmission Line. Both of the alternatives we presented would add approximately two miles to the length of the transmission route to Dixie Power Substation 51. We consider these alternatives to be not only reasonable, but essential to our physical and economic wellbeing. We urge you to recommend to the agencies that they adopt an alternative alignment outside of our community for the Sand Hollow to Dixie Springs Transmission Line.
Dana	Marrelli	1042	1537	Opinion - For Proposed Lake Powell Pipeline	The Southern Utah Home Builders Association is in support of the Lake Powell Pipeline Project and the best option that has come forth to date.
Nick	Oprandy	1043	1540	Water Law	My first concern involves water rights. If I have a domestic well for my home but the priority date of the right is junior to Lake Powell water where does that leave me if the pipeline can't be filled from what is projected. Can my right be taken to satisfy the pipeline's need? Would I be mandated to hook up to a conservancy pipeline for my domestic water?
Nick	Oprandy	1043	1541	Water Resources	Also I have a good water source without added chemicals. Another example is that Johnson Canyon water is quitepristine won't these waters be mixed once the pipeline dumps into the transfer tanks or whatever it takes to supply water to the area, basically degrading the water quality?
Nick	Oprandy	1043	1542	Aquatic Invasive Species	What about the musselencroachment how will that be handled so as to not foul all the pipelines and pump stations?
Nick	Oprandy	1043	1543	Water Supply	Another thought is that all the Colorado river water has not been adjudicated so how do you come up with enough for the pipeline.
Nick	Oprandy	1043	1544	Alternatives	A new wrinkle on wateravailability just surfaced since the the frac sand mine outside of Kanab that needed so much water is dead. So shouldn't the city and county pull out of the project since they always said there is plenty of water to go around. With good water conservation Kanab and Kane county would have plenty of water forfuture growth at least for now. The county, city and conservancydistrict could

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					always tap in at a later date if the water is needed. Wouldn't more and better conservation and rain storage methods allow for enough of the imminent growth. A St George paper just stated recently that St George has no water problem.
Nick	Oprandy	1043	1545	Socioeconomics	Lastly what is the estimated cost of the project how is this project going to be funded. Isn't it a taxpayer obligation? Haven't heard of the feds kicking in money like the CUP.
Robert	Jackson	1044	1546	Opinion - Opposed to Proposed Lake Powell Pipeline	This proposed pipeline is not needed, horribly expensive, and a waste of already over-allocated Colorado River water. I urge the officials responsible for reviewing this proposal to take in to account the following reasons for terminating this study and killing the proposed pipeline until such time as all officials advocating this pipeline are forthcoming about funding, demand management, and impacts on Upper and Lower Basin water users.
Robert	Jackson	1044	1547	Water Supply	The Upper Basin has been growing in population and water use; at this point, the states have not been using the full allocation of water from the river. The allocation was based on historic flows of nearly one hundred years ago which are no longer accurate. This is an era of increasing effects from climate change, including increasing drought and declining water supply throughout Upper and Lower Basins. In light of this, it is likely that pending re-negotiation of the terms of the Colorado River Compact will drastically alter allocations. The effect on the Lake Powell Pipeline is impossible to predict – there likely will be curtailment of allocated flows, which in turn will raise the per-gallon costs ever further.
Robert	Jackson	1044	1548	Alternatives	Again, effective demand management measures and careful analysis of declining supply should be instituted before wasting 2 to 3 billion dollars on an out-dated structure.
Egan	Rowe	1045	1549	Alternatives	If anything, saddling residents with the expense and potential tax burden to pay for this project, when any/all alternatives have not been explored makes this quite onerous.

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Egan	Rowe	1045	1550	Water Supply	Moreover,as someone dedicated to a career in the aquatic sciences I understand howoverburdened the Colorado River system is. Regardless, of the allotment granted by the Colorado River Compact, ifthis project were to be completed it would only further deplete this alreadyoverburdened riverine system. In thisday and age projects of this magnitude and scale should be applied to reducedeleterious anthropogenic influences to enhance the resiliency of these naturalresources, not exploit them further. Other allotted stakeholders have realized this and are actingaccordingly to reduce their consumption of this resource. As an act of good faith Utah as a wholeshould be joining into such agreements. Ultimately, with further droughts on the horizon contingency plans mustbe devised to manage and alleviate the effects of declining flows throughoutthe entire Colorado watershed.
S	R	1046	1551	Alternatives	I believe any/all alternatives should be explored before a project of this size and cost is approved.
S	R	1046	1552	Water Supply	Much of the data backing this project is flawed and has been debunked by experts in the field and many who originally backed the project. In fact, a recent audit of the UDWR found many flaws in how the data is being collected and reported for water usage in Washington County. If you look at water usage today, most of the inefficient usage from agriculture is nearly gone, which will decrease demand.
S	R	1046	1553	Socioeconomics	The economic impact of damaging open spaces by completing this pipeline will decrease the value and tourism demand that our area depends on. Any damage done by the project cannot be undone.
S	R	1046	1554	Water Supply	The recent years snowpack run-off and water levels of both Lake Powell and Lake Mead are another reason this project is likely to fail and create an undue burden on Utah Tax payers.
Alexandra	Corcoran	1047	1555	NEPA Process	Current Project Design Status (and Basis of Scoping Comments) Is UnclearThe current project design status of the Lake Powell Pipeline project is not clear. As such, it is unknown exactly which documents or project details these requested scoping comments should be based upon.

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Alexandra	Corcoran	1047	1559	NEPA Process	When the FERC license application was withdrawn in October, the Lake Powell Pipeline project design was in the process of being revised. Several months have elapsed and the public scoping comment period is nearly concluded - yet specific information has still not yet been provided about whether project design revisions are complete, what those revisions are, what the so-called current proposal currently looks like, and what specific environmental documents are referenced in the December 6th press release as the basis for scoping comments. The Bureau of Reclamation project website provides a brief overview, linking only to the Federal Register notice, News Release, the FERC withdrawal notice, and an undated map. ⁴ As such, initiation of a public scoping comment period at this time appears premature at best. Specific, useful comments cannot be provided while a project is undergoing major revision. The San Juan Southern Paiute Tribe reserves the right to provide additional comments on this project going forward, as more specific project details are provided.
Alexandra	Corcoran	1047	1562	Cultural Resources	Despite the current uncertain nature of the Lake Powell Pipeline project design revisions, it is nearly impossible to provide any meaningful comments on potential impacts to cultural resources. Yet given the (likely) anticipated breadth and scope of the pipeline and related construction activities and infrastructure, there are numerous eligible cultural resources that may
Alexandra	Corcoran	1047	1565	Cultural Resources	be affected by the proposed Project. ⁶ Indeed, as you may know, in 2011, the Southern Paiute Advisory Committee (which included the San Juan Southern Paiute Tribe) prepared an ethnographic study report titled "Southern Paiute Ethnographic Study - Lake Powell Pipeline" (hereinafter "Southern Paiute Ethnographic Study") which makes clear that Southern Paiute people were placed in their homelands by the Creator at least 12,000 years ago. ⁷ According to Southern Paiute origin stories, the Creator made the Southern Paiute people the sole owners and caretakers of their ancestral lands, which contain numerous areas of cultural sensitivity to the Tribe, including many sites that are eligible for listing under Section 106 of the National Historic Preservation Act.

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Alexandra	Corcoran	1047	1569	Cultural Resources	The San Juan Southern Paiute Tribe asks that the Bureau of Reclamation keep the Tribal Council timely informed regarding the status of this project. Further, we welcome the opportunity to engage in government-to-government consultation. Please include our General Counsel, Susan Montgomery (her contact information is provided below), on all communications to the Tribe associated with this project.
Jon	Parry	1048	1580	General	Comprehensive and robust water management planning in our state is critical in ensuring a high quality of life, strong economy, and healthy communities. Planning efforts that are able to balance multiple facets of water management, including water development and conservation, allow for the implementation of the most effective plans. Blanket dismissal of any of these planning components limits the effectiveness of planning efforts and will result in lack luster results that handicap our progeny and future residents of our state. Because of the forward thinking and planning demonstrated by our forefathers, our quality of life and economic potential that we enjoy today exists.
Brock	Jacobsen	1049	1585	Opinion - For Proposed Lake Powell Pipeline	Santa Clara City fully supports the construction of the LPP.
Rich	Juricich	1050	1588	Water Law	The export of water apportioned for beneficial consumptive use in the Upper Basin for use in the Lower Basin was not contemplated within the Compact, and it is the Board's position that specific Congressional authorization for this project would be required. Therefore, the Board believes that the proposed EIS must contain an analysis and determination of water supply availability and legal justification for the proposed project. From the perspective of the Compact and inter-basin issues, the Board suggests that this proposed project is precisely analogous to the Navajo-Gallup Water Supply Project that was ultimately authorized in the Omnibus Public Land Management Act of 2009, Title X Part III (Public Law 111-11) signed on March 30, 2009. It is the Board's position that the development and utilization of the LPP project would require specific Congressional authorization to divert water from the Upper Basin for use in the Lower Basin and to fully describe the parameters of water use and accounting for the project. The Board recommends that this important

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					aspect of acquiring a valid water supply for the project be clearly described and analyzed within the LPP EIS report.
Rich	Juricich	1050	1589	Water Resources	The Board suggests that the following additional relevant topics should be analyzed during the development of the EIS: ? Water quality impacts associated with the export of volumes of water supply from Lake Powell into the Virgin River Basin, including potential impacts to the water quality of Lake Mead;
Rich	Juricich	1050	1590	Aquatic Invasive Species	In a related vein, an assessment of potential impacts to the Virgin River watershed through the introduction of non-native species (e.g., quagga mussel, non-native fish species, etc.) via the export of water from Lake Powell into the Virgin River basin; and
Rich	Juricich	1050	1591	General	Impacts related to the production of hydroelectric energy at the Glen Canyon Dam powerplant and potential impacts to the Upper Basin Development Fund.
Rich	Juricich	1050	1592	NEPA Process	Finally, the Board respectfully requests that it be added to the distribution list for all information related to the proposed LPP project and preparation of the EIS report. The Board's primary contact for this project is: Mr. Rich Juricich, P.E. Principal Engineer Colorado River Board of California 770 Fairmont Avenue, Suite 100 Glendale, California 91203 rjuricich@crb.ca.gov 818-500-1625, ext. 303
Cheri	Condie	1051	1597	Opinion - Opposed to Proposed Lake Powell Pipeline	I do not want Lake Powell water to be diverted by a financially burdensome project that places debt on future generations of Utahns.
Cheri	Condie	1051	1598	Alternatives	Southern Utah cities can do their part to conserve the local water sources they already have. It should be one of many other alternatives that should be listed as part of the application.
Cheri	Condie	1051	1600	Alternatives	Please forward the following section of a Tucson, Arizona, Code to the petitioners as my alternative: Xeriscape Landscaping and Screening Regulations - Ordinance 7522A Xeriscape landscaping and screening ordinance became effective in February 1991. This comprehensive landscape code applies to new multifamily, commercial, and

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					industrial development. One of the goals of this ordinance is to conserve water by using established xeriscape principals in landscape design. The regulations require the use of drought-tolerant plants from a published list and limits non-drought tolerant vegetation to small "oasis" areas. Multifamily facilities may develop 5% of a site as an oasis area; commercial facilities are restricted to 2.5% of a site. Any water features or turf must be confined to the oasis areas. Canopy trees are required within all buffer yards, along street frontages, and within parking lots with one tree for every 15 spaces. All exposed ground areas of a site must be landscaped with ground cover to control dust. Landscaped area must be designed to
Cheri	Condie	1051	1601	Alternatives	take advantage of storm water runoff and the use of water-conserving irrigation systems is required.
Paul	Andrews	1053	1602	Opinion - Opposed to Proposed Lake Powell Pipeline	I would like to register my input and opposition to the proposed Lake Powell Pipeline Project.
Paul	Andrews	1053	1604	Alternatives	I would like to see that water conservation alternatives are added to the Environmental Impact Study.
Susan	Hand	1054	1606	NEPA Process	Some of the FERC research was completed more than a decade ago and the reliability/credibility of the content is in doubt. FERC Studies to be considered in this EIS should represent current finding and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports.
Susan	Hand	1054	1607	Purpose and Need	The DEIS process should describe in detail the purpose and need for this water delivery project.
Susan	Hand	1054	1608	Alternatives	It is critical that any and all alternative approaches for meeting needs be considered. This should definitely include water conservation, which has successfully met the needs of large and small municipalities in the southwest. Washington and Kane Counties lack developed and proven water conservation plans and implementation.

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					Communities that would be served by this project should be compared to water-wise communities. Other alternative approaches to meeting water needs should also be considered, such as reevaluated use or conservation of presently available agricultural irrigation water.
Susan	Hand	1054	1609	Socioeconomics	I am particularly concerned about the costs of this project to be borne by the water users as compared to the costs and overall benefits of pursuing alternative means of meeting our water needs.
Susan	Hand	1054	1610	NEPA Process	Information and detailed maps related to the National Environmental Policy Act (NEPA) was researched and developed by the Federal Energy Regulatory Commission (FERC), which was charged with oversight of the process. This work was funded by taxpayers, but the products have not been made available to them. This should be addressed before the DEIS is issued. There is a lack of information available to the public. Along with other some other members of the public, I've concerned myself with the development of this project over many years. I've attended public meetings and participated in opportunities for public involvement. However, currently there is little detailed information to be found on the internet or elsewhere. I'm aware of multitudes of uninformed individuals who do not have the opportunity to grasp the complexities of the project and its ramifications. Extensive work and studies compiled over the years are not available to our citizens. As soon as possible, details of the LPP routes should be represented on maps made available to the public in various formats. Jurisdictional and land management boundaries should be addressed. Maps currently available are too large scale to allow meaningful assessment of the project's potential impacts on lands, resources and values associated with those routes and lands; a 7.5 minute scale would be more appropriate. GIS project maps should be produced at a similar scale and made available as soon as possible.
Susan	Hand	1054	1611	General	The DEIS must evaluate all potential impacts on the resources and values of lands that the LPP may cross, or that may be collaterally affected on adjacent lands. Some of the areas that should be evaluated include: BLM Wilderness Study Areas, Areas of Critical Environmental Concern, Old Spanish Trail National Historic Trail, and Grand Staircase Escalante National Monument; NPS Glen Canyon National

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					Recreation Area; BIA/Federal trust lands of the Southern Paiute Indian Reservation. All impacts to the natural (geological, wildlife, botanical, soils, drainages, etc.) and cultural (archaeological, historical, ethnographic, etc.) resources, as well as identified values (recreation, wilderness, grazing, etc.) should be evaluated.
Susan	Hand	1054	1612	Aquatic Invasive Species	With the invasive and damaging Quagga Mussel now established in Lake Powell, the DEIS should evaluate the longterm risk to the regional pipeline and the water infrastructures that will connect to it, as well as to regional ecology such as the Virgin River. Chemical treatment could pose a serious risk to public health, while the microscopic early stage of this species is highly unlikely to be successfully filtered. Associated costs should be evaluated and reported.
Susan	Hand	1054	1613	Water Supply	A permanent water project such as the LLP should identify the probability that the related water right is secure now and into the foreseeable future—to include potential impacts of climate change. The Colorado River Compact over-allocates the water resource it's intended to manage. Flows are almost certainly inadequate to meet the delivery of apportioned quantities of water; volumes guaranteed by the Compact are or will be unavailable. Meanwhile, peer-reviewed science indicates that the total flow of the Colorado River is diminished, and that trend will likely continue. The consequences are likely to impact: legal agreements; maintenance of sufficient water in Lake Powell for hydropower production and other purposes; delivery of required volumes of water downriver to Lake Mead and Lower Basin states; and ever-inadequate river flow through the Grand Canyon and Grand Canyon National Park. I am particularly concerned that legally mandated protection of Grand Canyon and its resources and values and other downriver stretches be evaluated.
Kevin	Doyle	1055	1583	Other	Please add me to the mailing list for the proposed Lake Powell Pipeline project EIS.
Gretchen	Rowe	1056	1581	Water Resources	1. Recipients of Lake Powell Pipeline water are among America's highest water users 2. Washington County has America's cheapest water rates, which explains why they are one of America's biggest water users 3. Washington County is hiding a massive surplus of water 4. Future water demand is inflated by 100 %

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Gretchen	Rowe	1056	1582	Purpose and Need	5. The Washington County Water Conservancy District is proposing to increase water rates 300% which will eliminate any need for the Lake Powell Pipeline 6. Lake Powell Pipeline planning documents for Kane County were altered to fabricate the need for the Pipeline 7. Population growth forecasts have been inflated to exaggerate future water needs for Kane County 8. Lake Powell Pipeline proponents are ignoring future growth in municipal water supply from agricultural land conversion 9. The vast majority of water delivered by the Washington County Water District is for an extremely inefficient use
Anne	Zeigler	1057	1576	Water Supply	ClimateChange will have a huge effect on the amount of water available for thePipeline Project
Water	Power Law Office	1058	1509	Other	American Rivers requests that Reclamation add the following representatives to the service list for this proceeding:Matt Rice Colorado River Basin Director AMERICAN RIVERS 1536 Wynkoop St., Suite 321 Denver, Colorado 80202 (303) 454-3395 mrice@americanrivers.orgRichard Roos-Collins Julie Gantenbein WATER AND POWER LAW GROUP PC 2140 Shattuck Ave., Suite 801 Berkeley, CA 94704 (510) 296-5588 rrcollins@waterpowerlaw.com jgantenbein@waterpowerlaw.com
Water	Power Law Office	1058	1511	NEPA Process	A. Reclamation Should Clarify the Extent to which It Intends to Rely Upon the Administrative Record Compiled by FERC.As stated in Section I, FERC compiled an administrative record during the 11 years UBWR’s license application was pending. The Notice does not state whether or to what extent Reclamation intends to rely on the record compiled by FERC. American Rivers requests that Reclamation clarify the extent to which Reclamation will incorporate information in FERC’s administrative record into this administrative record.B. Reclamation Should Use FERC’s Scoping Document 2 As the Starting Point for Establishing the Scope of Its EIS.On August 21, 2008, after taking scoping comments from the public, FERC published its Scoping Document 2 for the LPP Project (Attachment 2). FERC’s Scoping Document and eventual EIS was intended to encompass the environmental impacts of the entire LPP Project. 3 With the exception of environmental impacts specific to hydropower generation, the scope of environmental impacts for the currently proposed LPP Project should be similar to that identified by FERC in 2008.American

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					Rivers recommends that the scope of Reclamation’s EIS include analysis of the potential environmental impacts of the project and alternatives identified in Scoping Document 2, with the exception of impacts related only to hydropower generation facilities since eliminated from the proposal, and any additional impacts identified since 2008.
Water	Power Law Office	1058	1516	Water Resources	Under Water Resources add the following:Effects on Lake Powell water levels and instream flows in the Colorado River downstream under climate change forecasts;Effects on demand reduction programs in Colorado River Basin states.
Water	Power Law Office	1058	1517	Socioeconomics	Under Socioeconomics Resources add the following:Effects of current population growth and water demand projections for Washington and Kane Counties on the economic feasibility of the project;Effects of water availability, including reasonably foreseeable restrictions on Lake Powell diversions (e.g., obligations under relevant Drought Contingency Plans, changes in Colorado River Basin Operating Guidelines), on the economic feasibility of the project.
Water	Power Law Office	1058	1519	Visual Resources	Under Visual Resources and Noise add the following:Effects of increased noise on wildlife in the proposed project area.
Water	Power Law Office	1058	1520	Cultural Resources	Under Archaeological and Historic Resources add the following:Effects of changes to visual resources on traditional cultural properties and cultural landscapes.
Water	Power Law Office	1058	1523	Climate Change and GHGs	2. Climate ChangeThe EIS’s discussion of the environmental setting and impacts of the LPP Project and alternatives should consider current and predicted climate change conditions, and other reasonably foreseeable changes to the affected environment. 5 Scientific data shows: “[c]limate change can make a resource, ecosystem, human community, or structure more susceptible to many types of impacts and lessen its resilience to other environmental impacts apart from climate change. This increase in vulnerability can exacerbate the effects of the proposed action.” 6Reclamation has identified the Colorado River Basin as already being impacted by climate change, the effects of which are likely to increase and intensify in

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					<p>the coming years. It has described some of these impacts as follows: Spring and early summer runoff reductions could translate into less water supply for meeting irrigation demands and adversely impact hydropower operations at reservoirs. Warming could also lead to significant reservoir evaporation, increased agricultural water demands and losses during water conveyance and irrigation. Growing demands in the Colorado River system, coupled with the potential for reduced supplies due to climate change, may put water users and resources relying on the Colorado River at risk of prolonged water shortages in the future. 7Reclamation’s “Colorado River Basin Water Supply and Demand Study” also found:In the absence of timely action, there is likely to be significant shortfalls between projected water supplies and demands in the basin in coming decades, which is likely to affect each sector (for example, agricultural, municipal, energy, and environmental) dependent on the Colorado River and its tributaries. The Basin Study also confirmed a wide range of solutions are needed to mitigate and adapt to such shortfalls. 8Reclamation has begun to use “Stress Test Hydrology” in its hydrologic modeling to better predict climate change impacts on water resources. “Stress Test Hydrology” focuses on 1988 to 2015 as the period of record to better reflect modern climate and water availability in the Colorado River Basin:The Stress Test Hydrology scenario removes the earlier portion of the natural flow record and focuses on the recent (approximately 30 years) hydrology, which has a 10% drier average flow than the Full Hydrology. Use of the Stress Test scenario is supported by multiple research studies that identified a shifting temperature trend in the Colorado River Basin in the late 1980s that affected runoff efficiency and resulted in lower average flows for the same amount of precipitation . 9American Rivers requests that Reclamation consider the potential impacts of the proposed LPP Project and alternatives in light of the Colorado River Basin’s increased vulnerability due to climate change using Stress Test Hydrology in its modeling analyses or other appropriate alternative future hydrology scenarios.</p>
Water	Power Law Office	1058	1525	Alternatives	<p>3. Reasonable Range of AlternativesThe EIS must “rigorously explore and objectively evaluate” a reasonable range of alternatives to the proposed action.10 Scoping Document 2 provided for the analysis of alternative pipeline routes and other reasonable, alternatives that meet the purpose and need of the proposed project (i.e.,</p>

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					increasing and diversifying water supplies for Washington and Kane Counties). ¹¹ Consistent with the direction established by FERC, the range of alternatives considered by Reclamation should include non-pipeline alternatives, including the Local Waters Alternative and others listed in Scoping Document 2.12 It should also consider reasonable alternatives that are beyond Reclamation’s authority to implement. ¹³ For example, FERC recommended further study of an alternative that would coordinate Nevada’s and Utah’s water development proposals even though such an alternative would be beyond FERC’s jurisdiction to require. ¹⁴ The EIS should also “include the population growth-related effects of the proposed pipeline and alternatives where such effects can be reasonably foreseen.” Scoping Document 2, p. 9.
Water	Power Law Office	1058	1528	Socioeconomics	American Rivers requests that Reclamation undertake, or direct UBWR to undertake, a study of the economic feasibility of the proposed LPP Project under a range of demand and water availability scenarios. Such analysis is important to the consideration of the environmental consequences of the LPP Project as compared to alternatives. ¹⁵ Questions regarding the economic feasibility of the LPP Project have persisted since UBWR filed its incomplete license application with FERC in 2008. ¹⁶ FERC directed UBWR to provide additional information regarding the economic feasibility of the project in 2016 and again in 2017. FERC Staff’s 2017 request to UBWR stated:[UBWR’s licensing] Study plan 10 identifies several key issues related to the proposed project that were not included in the Exhibit E of the license application or in Final Study Report 10. These include the likely cost of water to the participating water districts and their new and existing customers and the estimated financial feasibility of the project. Therefore, please provide the following:a) An estimate of the cost that would be allocated to each District and how that cost would be allocated among existing and new water users; including the likely impacts on user costs.b) An estimate of the financial feasibility of the project—including potential fiscal impacts on the State of Utah for funding the project. ¹⁷ UBWR did not provide a complete response to FERC’s request. ¹⁸ To our knowledge, it has not provided this information with respect to the LPP Project as currently proposed.The most recent economic analysis of which we are aware is “A Performance Audit of the

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					Repayment Feasibility of the Lake Powell Pipeline” (August 2019) prepared by the Office of Legislative Auditor General for the State of Utah. ¹⁹ The purpose of the audit was “to determine the ability of Washington County Water Conservancy District (WCWCD or district) to pay back the cost of the \$1.43 billion (2015 dollars) pipeline. Washington County’s future needs for water and the availability of water in the county and Lake Powell were not within the scope of th[e] audit.” ²⁰ The Audit found, “WCWCD has the potential to generate sufficient revenue to repay the cost of the LPP.” ²¹ The meaningfulness of the audit’s conditional finding that WCWCD has the potential to generate sufficient revenue to pay for the LPP Project is limited by the omission of future need for water and availability of water in the county and Lake Powell from the analysis. Water demand and availability of water to meet that demand are directly related to the economic feasibility of the project. If there is insufficient demand or insufficient supply to meet demand, then WCWCD’s water sales will not be sufficient water to repay project costs. For example, how are potential supply reduction scenarios under Drought Contingency Plans ²² and reasonably foreseeable changes to the Colorado River Basin operating guidelines likely to affect WCWCD’s ability to repay project costs? Is there a minimum amount of Lake Powell water that must be delivered to WCWCD for sale, annually or on average, for WCWCD to be able to repay project costs?We request that Reclamation undertake, or direct UBWR, to undertake further study regarding the economic feasibility of the LPP Project as currently proposed and under a range of supply reduction scenarios. The results of such study are necessary to Reclamation’s and Cooperating Agencies’ evaluation and disclosure of the socioeconomic impacts of the project and alternatives in the EIS.
Carmine	Mowbray	1059	1495	Opinion - Opposed to Proposed Lake Powell Pipeline	please record my position as supporting the position of the Conserve Southwest Utah organization . My comment is against the proposed pipeline.
Bryan	Dixon	1060	1486	Purpose and Need	Before launching into a detailed environmental analysis, it will be critical to demonstrate a valid purpose and need. Specifically,a. Single source: Washington County has a robust network of wells and surface water sources but WCWCD claims

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					<p>we are severely at risk because our water comes from a single source, that “source” being the entire Virgin River watershed. Many, if not most, communities rely on a single watershed, making this a spurious and inflammatory argument.b. Growth: WCWCD also argues that, without augmentation, our existing water sources will be inadequate for future population growth. But —apart from the fact that population estimates for decades hence are not only naturally fraught with uncertainty but Utah’s “internal growth” from its large family sizes is shrinking rapidly as women become more educated and integrated into the work force —this relies on two unjustifiable assumptions:i. We cannot have a vibrant community, in economic health or appearance, if we reduce our per capita water usage. However, Washington County has one of the highest per capita water use rates in Utah —over 300 gallons per capita day (gpcd), providing much low -hanging fruit for conservation efforts. Many other vibrant, attractive, and growing communities in the southwest use much less. WCWCD and UDWRe refuse to assess these other communities, arguing it’s impossible to compare them with Utah communities, which is, on its face, absurd. As a consultant for many years, I’ve been tasked with comparing any number of , on -the -surface , disparate situations.ii. We should not include in the calculus of future water supplies anything other than the sources we have now, which ignores, among other things, conversion of agricultural water and new technologies for water reuse. In truth, we cannot find land for the projected new populations without developing agricultural lands, which will, in their turn, give up their water rights, which water can then be reused for M&I. Agriculture uses nearly 80 percent of the water diverted in Utah. Further, there are many uses for water, especially domestic and institutional landscape irrigation, that can be satisfied with reclaimed or reused water. Before we commit to multiple billions of dollars of new steel and concrete and disturb the desert environment for 140 miles of the Lake Powell Pipeline, we need to exploit these other sources</p>
Bryan	Dixon	1060	1489	Water Supply	<p>2. It is also critical to know, with greater certainty, whether there will be water in Lake Powell to pump. Most assessments of the Colorado River conclude that, not only was the original 1922 allocation among the states based on overly optimistic flow projections, but, if climate change forecasts are anything close to accurate, those</p>

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					flows will never be reliably available. What is the best, modern, and accurate assessment of surplus water in Lake Powell?a. One WCWCD representative addressed this question by asserting that there’s plenty of water available for the LPP because the “Upper Basin States” are only required to deliver 7.5 million acre -feet per year to the “Lower Basin States,” but over the last ten years have delivered 92 million acre -feet, concluding that , therefore , there was more than 17 million acre -feet of surplus water that could have been available for the Lake Powell Pipeline. Ignored is the question of why, therefore, are both Lake Powell and Lake Mead less than forty -five percent full?b. Various state water agencies have also admitted that Utah’s water, and especially water in the Colorado River Basin, is over -allocated, indeed far over -allocated. The state has been unable to provide any evidence (beyond the assertions above) that there are valid, senior water rights available for the Lake Powell Pipeline. We need a more objective, accurate, truthful, and definitive analysis that provides assurance that a 140 -mile pipeline will not become merely an anachronistic curiosity, of interest only to future tourists marveling at the lack of wisdom of their forebears.
Bryan	Dixon	1060	1490	Alternatives	Other alternatives need to be addressed, specifically: 3. Conservation and wise water use: One local conservation group estimated that, if we only reduce our water use to 175 gpcd, our current supplies would support a population greater than that forecast by the governor’s own Kem C. Gardner Policy Institute for 2065. WCWCD maintains that they have already invested in conservation, but a closer look at the expenses they include reveals they include source augmentation (pipelines, wells, etc.) in “conservation” and have hardly scratched the surface on strategies to modify users’ behaviors that might greatly reduce per capita usage.
Bryan	Dixon	1060	1492	Socioeconomics	4. Furthermore, why must we begin now? Why can we not undertake substantive conservation measures and wait to begin this project until Washington County’s population grows, not only to see if population projections come to pass, but to provide a greater tax base to support repayment of the debt?
Holly	Snow Canada	1061	1434	Water Supply	I spent the summer of 2019 working and living in Page AZ and studying Lake Powell and I can say first hand that the Colorado River is not a reliable long-term source of

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					water for Washington County. Lake Powell was at its third lowest level ever in 2018 - a mere 37% of its full capacity.... 15 out of the last 19 years saw lower than average inflow to Lake Powell. And with climate change, this trend is likely to continue. For example, Jonathan Overpeck, a climate researcher at the University of Michigan, who has written several studies showing the lasting impacts of a warming climate, showed that from 1916 to 2014, flows in the Colorado dropped 16.5 percent, even though total precipitation in the upper basin increased slightly during that period, because of warming temperatures. Additionally, using the paleohydrologic record, we know that the first 19 years of the 21st century are already among the five driest extended periods in the past 1,200 years. We cannot depend on the Colorado River as a reliable source of water for our future.
Holly	Snow Canada	1061	1440	Aquatic Invasive Species	The pipeline would also spread quagga mussels, an invasive species, to the Virgin River, which would be costly and time-consuming to remove and would negatively impact the stream ecology.
Holly	Snow Canada	1061	1445	Impacts	The potential of the constructed pipeline to increase the negative effects of hazards like soil erosion, invasive plant growth, floods, and wildfires.
Holly	Snow Canada	1061	1446	NEPA Process	All relevant issues raised during the initial public scoping process (for the previously proposed pipeline project), as there are many who will not be able to comment again during this shortened 30-day comment period.
Holly	Snow Canada	1061	1450	Socioeconomics	3. Determine the impact on the quality of life of Washington County residents and business-owners created by the construction of the 140-mile pipeline and increased development of the area. 4. Evaluate the value added to the community under restricted development scenarios for the future (instead of creating more population growth). For example, how can we add value to our community in other ways like emphasizing environmental/parks/recreation tourism.
Holly	Snow Canada	1061	1453	Water Law	5. Add a water conservation alternative to the EIS studies. 6. Evaluate the costs and yields of major conservation methods, including: tiered water pricing and installing water meters.

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Holly	Snow Canada	1061	1456	Water Supply	7. Determine the high-probability long-term local water supply, including culinary, secondary, agriculture, reuse and water rights held by private landowners of Kane and Washington Counties.
Holly	Snow Canada	1061	1459	Water Law	8. Determine a reasonable and exemplary water use rate in comparison to other water-wise communities in other states. 9. Determine the probability that the LPP's water right is highly secure for a permanent water project
Holly	Snow Canada	1061	1461	Water Resources	10. Determine the high-probability long-term Colorado River flow for the LPP under a range of future climate conditions.
Holly	Snow Canada	1061	1462	Socioeconomics	11. Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.
Holly	Snow Canada	1061	1464	Water Law	12. Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP.
Holly	Snow Canada	1061	1465	Aquatic Invasive Species	13. A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system.
Holly	Snow Canada	1061	1467	Other	14. Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. It has been a decade or more since some of FERC studies were completed. This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS verify all previously submitted comments have been property dispositioned and that the FERC Study reports have been updated appropriately.

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Brenton	Rowe	1062	1426	Water Resources	1. Recipients of Lake Powell Pipeline water are among America's highest water users 2. Washington County has America's cheapest water rates, which explains why they are one of America's biggest water users 3. Washington County is hiding a massive surplus of water 4. Future water demand is inflated by 100%
Brenton	Rowe	1062	1429	Purpose and Need	5. The Washington County Water Conservancy District is proposing to increase water rates 300% which will eliminate any need for the Lake Powell Pipeline 6. Lake Powell Pipeline planning documents for Kane County were altered to fabricate the need for the Pipeline 7. Population growth forecasts have been inflated to exaggerate future water needs for Kane County 8. Lake Powell Pipeline proponents are ignoring future growth in municipal water supply from agricultural land conversion 9. The vast majority of water delivered by the Washington County Water District is for an extremely inefficient use 10. The Utah Division of Water Resources has admitted there is no need for the Lake Powell Pipeline
Seth	Shanahan	1064	1497	Water Resources	Since the LPP Project will transfer additional water to St. George, Utah, it may result in increased discharges to the Virgin River and Lake Mead if the transferred water is not fully consumed. If there are discharges, there may be unintended impacts to water quality and other aquatic resources. Potential impacts to stream water quality in the Virgin River should be addressed. It is highly likely that a portion of the transferred water that is applied outdoors could result in an increase in the non-sewered return flows to the Virgin River. Reclamation should closely review the assumptions and analyses of these potential impacts.
Seth	Shanahan	1064	1500	Aquatic Invasive Species	Lake Mead infestations of quagga mussels have increased maintenance costs of water users with pumps in Lake Mead, at the dams on the Colorado River, and in the river below Lake Mead. Reclamation should closely review the proposed methods for preventing the introduction of quagga mussels to Sand Hollow Reservoir and Quail Creek Reservoir by using a molluscicide, filtering mechanisms, or other proposed methods. Our experience has been that some molluscicides (e.g., Zequinox) do not have a 100% kill rate and filtering is not 100% effective. It is not unreasonable to conclude that quagga mussels could colonize appurtenant water delivery infrastructure and potentially the Virgin River. Reclamation should closely review the

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					assumptions and analyses for this topic to ensure that quagga mussels are not introduced into the Virgin River because of the project.
Seth	Shanahan	1064	1501	Water Resources	Lake Powell and Lake Mead reservoir operations are, among others, governed by the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead and the agreements related to the 2019 Colorado River Drought Contingency Plan. Reclamation should present in the EIS potential effects to Lake Powell and Lake Mead water surface elevation.
Seth	Shanahan	1064	1502	Water Supply	Appropriate water accounting methodologies need to be determined by Reclamation, in conjunction with the Seven Colorado River Basin States prior to the development of the LPP Project.
Paul	Ostapuk	1065	1475	National Trails	the Old Spanish National Historic Trail Comprehensive Administrative Strategy (2017) issued by the Department of Interior is an important federal document that provides the framework for future compliance with the National Environmental Policy Act and the National Historic Preservation Act for activities that could affect resources associated with the OSNHT corridor.
Paul	Ostapuk	1065	1481	National Trails	Another key federal compliance document is BLM Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (2012). This manual is one of three manuals in the National Trails System manual series (BLM Manuals 8353, 6250, and 6280). The 6280 manual provides manager s and program staff professionals with policies for the management of National Scenic and Historic Trails.Section 5.3 the 6280 BLM Manual describes protocol for proposed actions regarding national trails :A. Upon Receipt of a Proposed Action1. Where a proposed action is found to be inconsistent with the purpose for which the National Trail was designated, the BLM shall consider rejecting applications for proposed projects or denying approval of the action pursuant to FLPMA, the NTSA, and other applicable law and policy.2. The BLM may not permit proposed uses along National Trails which will substantially interfere with the nature and purposes of the trail, and the BLM shall make efforts, to the extent practicable, to avoid authorizing activities that are incompatible with the purposes for which such trails were established (see Chapter 1.6 Statement of

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					Programmatic Policy).3. If the BLM chooses not to defer analysis of a proposed action, the BLM shall follow the applicable procedures and protocols outlined in this manual.B. Determining the Scope of Analysis1. The BLM shall consider the significance of the Congressional designation as a National Trail (P.L. 90 -543), as a unit of the NLCS (P.L.111 -11), and public and private contributions and volunteer efforts along a National Trail when evaluating whether to approve a proposed action along the designated trail. The BLM shall manage the National Trails and the areas through which such National Trails may pass in a manner that
Paul	Ostapuk	1065	1482	National Trails	recognizes the national significance of the trails and the individual or collective significance of National Historic Trail Federal Protection Components, including high potential historic sites and high potential route segments. The national significance of National Trails must be considered in the local, regional, and national context under the NTSA and NHPA, as applicable.2. If a National Trail Management Corridor has not been established in a land use plan, the BLM should undertake the following:i. A viewshed analysis to evaluate whether the proposed action is contained within the viewshed.ii. If within the viewshed, and likely to cause adverse impact, a BLM National Trail inventory and assessment is required, and should be broad enough to be able to identify reasonable alternative project locations with potentially less or no adverse impact. Upon inventory, the area of potential adverse impact shall be delineated, encompassing the resources, qualities, values and associated settings and the primary use or uses identified.iii. The BLM will identify, within the area of potential adverse impact, any adverse impacts to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses for the affected environment, alternative formulation and analysis, and environmental consequences (see chapter 3 of this manual).iv. The BLM shall consider alternatives which support National Trail purposes in accordance with this policy. The BLM will consider alternatives which direct the proposed project outside the area of potential adverse impact or to a comparably disturbed or culturally modified area, such as areas already containing transmission lines, pipelines, highways, or improved roads.3. Where National Trails have been addressed through land use planning process in accordance with Chapter 4 of this policy, the National Trail Management Corridor shall serve as

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					the area of consideration for the purposes of the NEPA analysis, and alternatives must be consistent with the Resource Management Plan. Note: in determining land use plan conformance for proposed projects with established National Trail VRM classes, the term key observation point (KOP) replaces the term inventory observation point (IOP); however, the policy in section 3.4. B. 1 -4 of this manual still applies
Laura	Fertig	1067	1417	Other	1. Economic viability of the LPP As a resident and taxpayer in Kane County, I am concerned about the effects of the pipeline on property taxes, impact fees, and exorbitant water rates. The question of who will bear the burden of paying the enormous cost of this project has been obfuscated in the past, leading to some uneasiness on the part of the public. This lack of certainty and trust would be ameliorated greatly by including in the EIS a transparent, detailed, objective analysis of how much the ultimate price tag will be.
Laura	Fertig	1067	1418	Climate Change and GHGs	I am concerned about regional climatic projections indicating that this area is likely to experience trends of increased temperatures and decreased precipitation levels. This may impact the viability of the LPP, rendering it inoperable within a short period of time. Please discuss the point at which the Lake Powell reservoir water levels become too low to allow the Utah Board Water Resources (UBWR) to draw water from it and the pipeline can't function. This speaks directly to the stated purpose of the LPP to enhance the reliability of water sources.
Laura	Fertig	1067	1419	Alternatives	Please discuss the capacity for conservation and reduction in water usage to supply the future water demands rather than the LPP. Also analyze the possibility that, with proper management, water requirements could be lower than that determined by the state of Utah, obviating the need for the LPP. Include a conservation alternative that compares hydrological data from current water use with data under a conservation regime that includes efficiencies, reclamation, and groundwater recharge.
Laura	Fertig	1067	1448	T&E Species	Please analyze the effects of the project on all rare species in the project area, not just those listed under the Endangered Species Act and the Utah BLM Sensitive Species list but also those plants and animals determined to be rare according to the Utah Native Plant Society (https://www.utahrareplants.org/rpg_species.html) and the

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					Utah Conservation Data Center (https://dwrcdc.nr.utah.gov/ucdc/). These sources are more comprehensive and give a better indication of what the impacts of the project are on rare species. In particular, Mojave desert tortoises occur in Washington County and may be adversely affected by the LPP. How will this impact be exacerbated by potential construction of the Northern Corridor in the Red Cliffs National Conservation Area? The cumulative effects of implementation of this highway project should be analyzed, including the potential for facilitating new development and degrading or removing habitat.
Laura	Fertig	1067	1451	Mitigation	Please review the effects of construction on weed species. There are extensive populations of cheatgrass in the project area, which can be expected to rapidly colonize the bare soil caused by the mechanical surface disturbance. How will this be mitigated? Keep in mind that past projects in the area have either not mitigated weed increases or the mitigation has failed, leading to the increases in flammable exotics on the ground.
Laura	Fertig	1067	1454	Mitigation	The surface disturbance associated with construction with heavy equipment will remove vegetation and biological soil crust, compress soils, and increase erosion. How will that be mitigated? There is a small area of gypsum soils along the proposed route with extensive and highly diverse biological soil crust organisms. There is even a rare moss (<i>Didymodon nevadensis</i>) not known from elsewhere in the (former and perhaps future) Grand Staircase -Escalante National Monument (GSENM), and an even rarer lichen (<i>Gypsoplaca macrophylla</i>) that is rarely seen by researchers but which occurs in high concentrations on Shnabkaib soil within easements along the north side of of Hwy. 89 within the former boundaries of the GSENM. These areas should be protected from construction.
Laura	Fertig	1067	1458	General	Please update the Federal Energy Regulatory Commission (FERC) studies to include the current BOR studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. These FERC studies are out of date. This affects their credibility.
Gary	Werner	1068	1416	National Trails	Planning and management of the OSNHT' corridor, OSN HT' resources and values, and evaluation of potential impacts on the Trai I. Trail corridor. and its resources and

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					values, are subject to the mandates of the NTSA, the statutorily required comprehensive management plan for the OSNHT, and regulations and policies of the land management agencies. Primary mandates and policies include:the NTSA;the Old Spanish National Historic Trail Comprehensive Administrative Strategy, SLM & NPS (2017); and, BLM Manual 6280Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Public) (2012).It is the position of PNTS that all potential LPP project impacts on the OSNHT and its resources and values must be evaluated; precluded where statutorily mandated by the NTSA, and otherwise minimized or mitigated to meet the goals of the NTSA.
Tracy	Hiscock	1069	1408	Other	Determine the total cost of the LPP, including operations and maintenance costs. This must include the large expense of pump storage and other project features. The final configuration of the pipeline needs to be defined, and an accurate total cost determined, in order to discuss the socioeconomic impacts of the project.
Tracy	Hiscock	1069	1409	Other	Determine how the specific LPP costs (now estimated to be over \$2 billion) will be paid back to the state, including the tax burden on residents. A Utah Legislative audit just released in August of 2019 noted that the pipeline payback requirements are not fully defined in the Lake Powell Pipeline Development Act. It leaves questions unanswered concerning repayment of pipeline costs to the state. These uncertainties in the act’s repayment requirements could seriously impact the state’s repayment revenues. It could also cripple the local economies of Washington and Kane Counties with high impacts fees, property taxes and water rates.
Tracy	Hiscock	1069	1410	Alternatives	Include a “conservation” alternative to the EIS that would reduce the demand for water through a number of conservation methods and evaluate the costs and yields of these methods, including increased reuse for landscaping, including metering of such secondary water, and agricultural water transfers. Also, include an analysis of treatment of ground water, storm water capture, and acknowledge surplus municipal water supplies that already exist. These measures, all together, would result in a sustainable water supply for the future.

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Tracy	Hiscock	1069	1411	Water Supply	Collect data and determine the high -probability long -term Colorado River flow for the LPP under a range of future climate conditions, including the possibility that the lake level will drop below the pipeline level. Water managers have recognized the last 20 dry years as a drought and climate researchers warn the River will continue to carry less water to Lake Powell in coming years. Bureau of Reclamation reports show that the Colorado River is over allocated and that flows will continue to decrease. Lake Powell is currently about half full and is never expected to fill to its earlier levels. The LPP may never be able to deliver the amount of water needed in the future, yet it would still pose a significant financial burden for users and taxpayers.. Investing billions of dollars into a project that may not produce water in the future is a huge financial risk for all involved. This likely scenario must be considered in analysis of the pipeline's impacts.
Tracy	Hiscock	1069	1412	Aquatic Invasive Species	Conduct a study on costs and prevention of the risk of the infestation of quagga mussels into regional and local pipelines from the LPP. Despite efforts at prevention, quagga mussels and their larvae are abundant in Lake Powell, where they get sucked into boats' internal systems and would surely enter the LPP. Filtration systems have not yet worked to prevent the spread as the larvae are microscopic. Treating the water with chemicals to prevent the spread must also be analyzed as to health and environmental risks. Additionally, any analysis must take into account preventing the spread of this invasive species into the Virgin River, a National Wild and Scenic River, and its tributaries.
Tracy	Hiscock	1069	1413	Other	Update the analysis and input that has already taken place. It has been a decade or more since the initial Federal Energy Regulatory Commission (FERC) studies were completed. This affects their reliability and the credibility to be used in this scoping process and EIS. If the FERC studies are to be used herein, BOR must verify that all previously submitted comments (including one that I submitted at that time) have been property dispositioned and that the FERC reports have been updated appropriately. As a member of the public who participated in that process, I hold a large stake, along with others, in having my initial comments considered and not discarded.

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Tracy	Hiscock	1069	1414	Impacts	<p>1. Native American Religious and Cultural Concerns and federal trust responsibility. The ACEC contains many archeological sites, ancient and historic. It includes rock carvings and artifacts. It is entirely within Southern and Kaibab Paiute and possibly Hualapai traditional lands and is significant to these sovereign nations as such. Consultation with such connected tribal governments is required in this matter. Parts of the ACEC contain sites, or are adjacent to sites that are sacred to these Indigenous people, where important ceremonies took place, including a Ghost Dance in the late 1800's. This event has been studied and documented by ethnographers and archeologists. Ethnographic research shows that locations throughout the ACEC are likely to be culturally significant. The subtlety with which the significance of such locations may be expressed makes it easy to ignore them. However, it is illegal to do so. Thus, no evaluation of the area can take place without, again, full consultation with any and all associated Tribes. The United States government and its component agencies (such as the BOR) have a long standing federal trust responsibility to Native Americans, which must be acknowledged and upheld here. This includes determining the Tribes which consider themselves to be associated with the area and consulting with them. 2. National Historic Preservation Act (NHPA) concerns. The prevalence of the aforementioned cultural resources associated with Southern Paiutes in the upper Kanab Creek ACEC warrants its evaluation as a traditional cultural property within the meaning of the NHPA. The Ghost Dance and associated sites in particular may be eligible for inclusion in the National</p>
Tracy	Hiscock	1069	1415	Impacts	<p>Register of Historic Places. BLM and BOR are obligated under this law to evaluate this area before even considering an amendment to the RMP. 3. Wilderness values. The BLM noted that the ACEC contains “wilderness characteristics with a high degree of naturalness, outstanding opportunities for solitude and opportunities for primitive and unconfined recreation.” Indeed, as a hiker in the area, I have experienced these wonderful qualities. Construction, monitoring and maintenance of a pipeline here would definitely impair these values. 4. Riparian Zones. This ACEC contains important riparian zones, which would be greatly impacted by the construction, monitoring and maintenance of a pipeline. It encompasses an important transitional zone where the drainage begins its descent on the Arizona Strip to the</p>

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					<p>Grand Canyon. Kanab Creek is one of the major tributaries of the Colorado River, and the largest tributary canyon system on the north side of the Grand Canyon. It is a huge and significant drainage. The BLM committed to manage riparian areas here to “achieve and/or maintain proper functioning condition and be of sufficient quantity and quality to provide adequate foraging areas for the Southwest Flycatcher, Yuma Clapper Rail, Yellow - billed Cuckoo, and other special status birds.” The BOR is required to do the same. 5. Vegetation disturbance. Vegetation disturbance will be extensive in the ACEC if a pipeline is constructed, monitored and maintained. This includes the loss of shrubs, grasses, and forbs by excavation and clearing. 6. Invasive species. Invasive plants will grow in areas disturbed and cleared by pipeline construction, monitoring and maintenance of a pipeline. It is a stated goal of the RMP to minimize and eliminate invasive plant species. The BOR must uphold this goal. 7. Wildlife. Wildlife will be disturbed from noise and human activity associated with construction, monitoring and maintenance of a pipeline, causing displacement of animals. 8. Endangered species. The ACEC is managed to protect the endangered Southwest Willow Flycatcher. Any disturbance of the ACEC riparian zone would affect this bird. 9. Soil disturbance. Soil disturbance is a direct effect of construction. It can exacerbate impacts to other values, such as riparian zones, vegetation disturbance, and it invites invasive plants. It also destroys archeological evidence in cultural and historic areas, such as are within the ACEC. 10. Recreation in the ACEC would be impacted by pipeline construction, monitoring and maintenance in the ACEC - by noise, dust and loss of solitude. 11. Visual Resources. The ACEC is currently a Class II area under the Clean Air Act. Pipeline construction, monitoring and maintenance in the ACEC would have a huge impact on the Visual resources of this vast, open landscape. The AZ Strip RMP should not be amended to change the Visual Resource Management Class from Class II to a less protected Class III or IV. The area was thoroughly evaluated in the original RMP process with much greater public input than is being allowed now, and these high values were reaffirmed by the BLM in 2015. The objectives for Class II include retaining the existing character of the landscape, “changes to the landscape should be low,” and “management activities may be seen but... not attract the attention of the casual observer.” . Clearly the</p>

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					<p>construction, monitoring and maintenance of a pipeline would attract the attention of the casual observer, and could not be considered low as intended in the BLM determination. It would also create dust, which would affect the visual clarity and clean air of this landscape The BOR is required to consider federal law such as the Clean Air Act and its designations and may not, without detailed analysis as public input as was conducted by the BLM, change designation of an ACEC. 12. Alternatives to any proposed route through the ACEC must be considered. Reasonable alternatives do exist. Along the Highway corridor, or nearer to it are reasonable alternatives, which would decrease the physical and visual impacts and impairment to the BLM stated values of this ACEC.</p>
Pat	Cleavinger	1070	1407	General	<p>The LPP proposal at this point does not address many key issues that should be included in an EIS. The issues I am aware of and would advocate be addressed in the EIS include: 1. A well -designed water conservation plan following practices that have proved to be effective in reducing water usage in similar desert communities while still supporting a vibrant lifestyle and smart growth. An evaluation of the cost -benefit ratio of conservation methods should be included. 2. Determination of a reasonable water use rate when compared to other water -wise communities in other areas and other states, especially desert communities. 3. Determine that the LPP water right is highly secure for this expensive and permanent water project. 4. Determine precisely how the project will be paid back by the state with accurate tax burdens to residents. 5. A detailed study on the costs and potential for further spreading of the infestation of the quagga mussels from Lake Powell. 6. Consideration of updated studies of the effects of climate change and the projected effect on the Colorado River as a water source.</p>
perry	suden	1071	1406	Opinion - Opposed to Proposed Lake Powell Pipeline	<p>To Whom it May Concern,I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway. The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.Washington and Kane counties are some of the largest per capita water users in the country.Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.The strategy for using water in the Southwest should be based around conservation and sustainability, not more</p>

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					consumption. For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward. Thank you for taking the time to read my comments. Perry Suden 675 S Aspaas Rd Cornville, AZ 86325
Leina	Mathis	1072	1405	Opinion - For Proposed Lake Powell Pipeline	To this end, I am in FULL SUPPORT of the pipeline. As a resident and local leader, I think it would be foolish for us to rely on a single water source, particularly when that source, the Virgin River, is unreliable. As families we do not rely on one component for preparedness, rather we have food storage, rainy day funds, 24 hour kits, camping gear, etc. When it comes to water we should expect our leaders at both state and federal levels to support local leaders who understand the importance of preparation in multi faceted ways. I think we want to be good neighbors and appreciate and understand the concerns from the tribe. My recommendation is to take the Southern route and minimize the disruption to their lands. As for the cost, which is always identified as a concern, the most recent report from the state office of budget has indicated that the project can realistically be paid for through the mechanisms and savings that are identified in the plan. I also support this plan as the majority of payment (75%) is coming from impact fees, which means those causing the growth for the most part are bearing the cost. There are many other reasons to support the pipeline. I hope you will listen to local leaders and not be swayed by lobbying groups who do not live within our communities. Thank you for your time!
Bonnie	Fletcher	1073	1403	Opinion - Opposed to Proposed Lake Powell Pipeline	The proposed Lake Powell Pipeline is a very bad idea for the state of Utah: • The large price tag for taxpayers could better be used for such things as education and bridge/road infrastructure • Even though it may be our water ["Utah's"], there is no justification since the projected population growth is exaggerated and people's future needs is based on the wasteful, inefficient use of water from the past and present • Water managers and local governments in southern Utah must put emphasis on conservation, with consequences for residents such as fines or higher rates if over - used, as has happened for all those residents in the Lower Colorado basin Utah water managers can take a leadership role in reducing and conserving our water. All we need is the "will" to do this.

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Kristin	Rauch	1074	1402	Opinion - Opposed to Proposed Lake Powell Pipeline	I attended the meeting held on January 5th, 2020, at the Kanab Center . Although h the meeting was scheduled for 2 hours, the presenter spoke for less than 45 minutes and did not allow any time for a question and answer session. My friends and neighbors that were in attendance were greatly disappointed with the meeting and lack of public discourse. --I believe other options exist to supply St George and western Kane county with the water that is required and I believe much more attention should be placed on a water conservation alternative. —It is a fact that St. George uses more municipal and domestic water per capita than other Southwest cities. Specifically, Las Vegas and Tucson use less per capita than St. George. --The lender for the Lake Powell Pipeline will be Utah taxpayers. —The true beneficiaries of the planned neighborhoods, golf courses, water parks would be the developers.
Devin	Eaton	1075	1401	Opinion - Opposed to Proposed Lake Powell Pipeline	Please do not continue with the Lake Powell Pipeline. It is unnecessary, a huge waste of money, and I do not want to see more water diverted from the Colorado River just because Utah has some unused water rights. The river is already so overly managed it never reaches the ocean and hardly ever runs wild. One of the most interesting rivers in the world has been totally domesticated. It's a waste of power too, mostly coming from burning coal. I'm not sure if this project is still falsely being framed as a power production project, but if it is, I say no to that as well because it's going to consume way more than it generates. Does St. George really need to grow any more? It's a city in the desert that wants unlimited water and golf courses. Is that really feasible? Placing this pipeline will allow more people to live there than the land can handle. What if the pipeline failed? How long would sand hollow support those multiple hundreds of thousands of people, the golf courses, and all that farm land? Please just do away with this horrible project for once and for all.
Sandy	Ferrell	1076	1400	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to building the Lake Powell Pipeline for four reasons: 1. First and foremost, I believe we should add a water conservation alternative to the EIS studies. In my opinion, constantly altering the ecosystem or implementing costly measures to support growth in desert ecosystems where the carrying capacity is already limited is short -sighted at best. A far better alternative is to look at implementing water conservation measures at all levels before proceeding with a pipeling. 2. In light of the uncertainty created by climate change, I believe investing in the Lake Powell Pipeline

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					could be a futile attempt to pull water where there is none available. The Colorado River is already over allocated. Planning on that source of water in an uncertain future doesn't make sense to me. Before proceeding, I believe we should determine the high -probability long -term Colorado River flow for the pipeline under a range of future climate conditions. 3. I am an educator, and I'm constantly frustrated with the fact that our tax revenue can't keep up with the growth in our schools. Before adding a very costly financial drain on state resources, I believe we should have a clear plan as to how the costs will be paid back to the state, including the tax burden on residents. We can't fund everything. If the pipeline is built, I'm afraid the tax burden will deplete resources for schools. 4. I'm a strong believer that humans should not alter ecosystems beyond their ability to recover. The Quagga mussels are an example of a human -caused problem that may never be resolved. Could the invasion of Quagga mussels in Lake Powell spread to cities and their water systems causing even more damage? How will pulling more water from Lake Powell impact species that live downriver in the Colorado River? If everyone tries to extract their water allocation through water rights, what will be left of the river? Please reconsider this proposal. If water conservation is not added as an alternative, I would vote for the NO ACTION ALTERNATIVE.
Ann	Foster	1078	1398	Alternatives	I believe that water conservation is inadequate in the area. Per person water use in Las Vegas is considerably less than in St. George area. It seems to me that conservation programs should be encouraged before any expensive pipeline plans are pursued.
Ann	Foster	1078	1399	Climate Change and GHGs	Further I believe that the basis for calculating the available Colorado River volume needs to be reassessed and the impact Climate Change be taken into consideration before further action is taken on obtaining rights to build.
Jerry	Gonzales	1079	1397	Alternatives	I am requesting a study on what the costs to residents will be, both short and long term, if the pipeline is constructed. I also request information on what water conservation measures are being analyzed in the study - including restricting water consumptive landscaping, purchasing existing water rights from farmers and

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					ranchers, and use of treated water for non domestic uses. This would be considered as an alternative to the LPP.
JIM	CLARK	1080	1530	Visual Resources	When we learned that the marvelous views of the surrounding area seen from Dixie Springs were going to be forever destroyed by this relatively large power line, we were greatly saddened. Also, with the associated electro magnetic fields inherent to close proximity of HV powerlines, we were alarmed and very disappointed. On top of that, the negative effect this eyesore will have on our property value adds to our consternation. The value of our house will certainly go down. Indeed that would be the case for this entire subdivision if this line is installed.
JIM	CLARK	1080	1533	Alternatives	That being said, I appreciate the fact that we have been afforded the opportunity to weigh in with opinions and alternative ideas that will be taken into consideration. Some have suggested alternative routing of the overhead line. That is certainly an option but another option is available. An option I brought forward in a previous group meeting that we Dixie Springs residents had with the folks from the Water Conservancy back in 2017. I asked them to please explore the direct bury underground cable option. It's my understanding that some believe this option was dismissed because of the opinion that high voltage power lines cannot be put underground. That is a patently and demonstrably erroneous belief. The fact is underground HV transmission lines have been around since the 1920s when 132kV power lines were first installed in the United States. Back then it was HPFF or High Pressure Fluid Filled pipes with conductors wrapped in paper insulation. The fluid was di -electric or non conductive. The pipes are covered in a protective rubber coating. In the 1960s the technology progressed whereby T -lines up to 345kV could be placed underground in HPFF systems or HPGF (High Pressure Gas Filled) systems. The newest technology is the XLPE or Cross Linked Polyethylene Cable which eliminates the need to have fluid or gas surrounding the conductor. Through the years this system has only gotten better. It is used for very high voltages where existing ROW is inadequate for increased line capacity and new larger ROW is impossible. Underground lines up to 500kV have been installed and in operation so yes, 69kV lines are entirely possible. To the point here, using the XPLE system to run

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					this short one mile section of 69 kV underground would preserve the beauty of this area, eliminate the EMF worries, and would not decimate the property values out here as would be the case with an unsightly overhead power line running through this subdivision. The XLPE cable is more expensive to install than the overhead system, per mile, but the short distance down 3400 W in Dixie Springs (actually less than a mile) as compared to the length of an alternative route for overhead lines also under consideration would be close to the same.
JIM	CLARK	1080	1535	Other	Furthermore, if there is concern about the idea of economic feasibility of the underground idea, I ask for the same honest and objective consideration to be given to the economic impact we Dixie Springs residents will feel. Our property values will be adversely affected by this overhead 69kV power line running through the community.
JIM	CLARK	1080	1536	Impacts	There will probably be contests to the ROW when people have to remove structures from their back yard - and what to do about swimming pools close to under a new and unexpected power line? From no EMF to loads of EMF and all the adverse health effects. From unobstructed views of such natural beauty to looking at a huge eye sore. From high property values to greatly reduced values because of everything mentioned above. All of this will be the result to the residents of Dixie Springs due to the construction of this overhead line through our beautiful neighborhood.
JIM	CLARK	1080	1538	Alternatives	The proposed underground cable option would be perhaps even easier because 3400 W is such a wide street and that should make the ROW concerns minimal if not nonexistent. Avoiding obstacles (water, sewage, cables for distribution electrical and comm cables) would be accomplished by either jack boring or directional boring underneath obstacles or with the use of vaults. Anyway, without getting into any more detail than I already have, I hope you will consider utilizing the underground option or an above ground reroute for the 69 -kV line structures so as eliminate the negative impact this line would surely have upon so many residents of Dixie Springs.
JIM	CLARK	1080	1539	Opinion - Opposed to	In closing I ask whomever ends up reading this letter - please, take a drive around Dixie Springs and look at the homes and the views. These are all very nice homes. Again, the value of this entire area will be very negatively effected as will be the

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				Proposed Lake Powell Pipeline	overall well being of literally every person here. We deserve better than to have this overhead transmission line thrust in our midst. I ask that those making this decision put yourselves in the situation the Dixie Springs Residents are in now. Would you want this to happen to your neighborhood?
Susan	Clark	1081	1393	Electric and Magnetic Fields	My concern is the associated 69KV power line that is proposed to go through the residential subdivision of Dixie Springs in Hurricane, Utah. The Dixie Springs Subdivision is located north of Sand Hollow Reservoir. In the subdivision all existing power lines are underground. The proposed power line route is along the street of 3400 West, Hurricane, Utah. The majority of houses have their side yards facing 3400 West and many of the lots have swimming pools and tall RV garages along that side of the street which is a dangerous combination with a power line overhead. There is only one small block of houses that the front of the houses face 3400 West so have their front yard along 3400 West but most are narrow side yards and all have concrete block fences (walls). The danger is with the associated electro magnetic fields inherent to close proximity of HV power lines and being too close to roof tops (tall RV garages). On top of that, the negative effect this eyesore will have on our property value. Currently our electric power is supplied by a underground distribution system and that system will gain no benefit from that imposing 69kV overhead line. It will be not only out of place but a horrible eyesore and a source of fear for those forced to live underneath the lines. An overhead transmission line through a developed community of underground power would be the cancellation of the benefits of that underground distribution system which is obviously part of the built in costs we paid for these beautiful homes. There will probably be contests to the Right of Way (ROW) when people have to remove structures from their back yard - and what to do about swimming pools close to under a new and unexpected power line? From no EMF to loads of EMF and all the adverse health effects. From unobstructed views of such natural beauty to looking at a huge eye sore. From high property values to greatly reduced values because of everything mentioned above. All of this will be the result to the residents of Dixie Springs due to the construction of this overhead line through our beautiful neighborhood.

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Susan	Clark	1081	1394	Alternatives	ALTERNATIVES TO THE POWER LINE ALONG 3400 WEST, HURRICANE, UTAH (DIXIE SPRINGS SUBDIVISION) 1. An alternative routing of the overhead line. There are existing power lines on the very north end of the subdivision away from houses. They are not visible from most of the subdivision. Run the water pipeline's power line along this existing power corridor.
Susan	Clark	1081	1395	Alternatives	Direct bury underground cable along 3400 West. This is less than 1 mile through the neighborhood. It would be more expansion but worth it for the safety of the neighborhood. The newest technology is the XLPE or Cross Linked Polyethylene Cable eliminates the need to have fluid or gas surrounding the conductor. Through the years this system has only gotten better. It is used for very high voltages where existing Right of Way (ROW) is inadequate for increased line capacity and new larger ROW is impossible. Underground lines up to 500kV have been installed and in operation so yes, 69kV lines are entirely possible. To the point here, using the XPLE system to run this short one mile section of 69 kV underground would preserve the beauty of this area, eliminate the EMF worries, swimming pool issues, and would not decimate the property values out here as would be the case with an unsightly overhead power line running through this subdivision. The XLPE cable is more expensive to install than the overhead system, per mile, but the short distance down 3400 W in Dixie Springs (actually less than a mile) as compared to
Susan	Clark	1081	1396	Alternatives	the length of an alternative route for overhead lines also under consideration would be close to the same. Furthermore, if there is concern about the idea of economic feasibility of the underground idea, I ask for the same honest and objective consideration to be given to the economic impact we Dixie Springs residents will feel. Our property values will be adversely affected by this overhead 69kV power line running through the community. The proposed underground cable option would be perhaps even easier because 3400 W is such a wide street and that should make the ROW concerns minimal if not nonexistent. Avoiding obstacles (water, sewage, cables for distribution electrical and comm cables) would be accomplished by either jack boring or directional boring underneath obstacles or with the use of vaults. Anyway, without getting into any more detail than I already have, I hope you will consider utilizing the underground option or an above ground reroute for the 69 -kV line

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					structures so as eliminate the negative impact this line would surely have upon so many residents of Dixie Springs. In closing I ask whomever ends up reading this letter - please, take a drive around Dixie Springs and look at the homes and the views. Look at the narrow space along 3400 West since the majority of houses have their side yards are facing the street. These are all very nice homes. Again, the value of this entire area will be very negatively effected as will be the overall well being of literally every person here. We deserve better than to have this overhead transmission line thrust in our midst. I ask that those making this decision put yourselves in the situation the Dixie Springs Residents are in now. Would you want this to happen to your neighborhood?
Linda	Bily	1082	1390	Areas of Critical Environmental Concern (ACEC)	The pipeline will cross Areas of Critical Environmental Concern. Those areas were established because of their unique resources and those resources have not gone away just because someone wants to build a pipeline. In order to overturn the protections of the ACECs, I believe that the value gained must be substantial, provable and not attainable in any other practical way. I believe the pipeline flunks those tests.
Linda	Bily	1082	1391	Alternatives	Is there a water conservation alternative to the LPP? Washington County has one of the highest average gallons used per capita in the area. Even a 25 decrease achieved already and a proposed further 20% reduction will not bring us close to the leading municipalities in the SW.
Linda	Bily	1082	1392	Water Supply	Is there going to be sufficient water in the Colorado River to meet the current and projected needs of those relying on it? Will the proposed pipeline be pumping sand instead of water? I believe the overwhelming majority of scientists of all nations and political leanings who say the climate is changing and that continued drought in our area is probable. If there is insufficient water in the River, the environmental costs of the pipeline will have been wasted.
Jason	Tea	1083	1389	Opinion - Opposed to Proposed Lake Powell Pipeline	In my opinion, spending a significant amount of money to build the LPP (Lake Powell Pipeline) when additional efforts to conserve water have not been seriously considered or undertaken should not be done. The allocation of water from the Colorado River Compact signed in 1922 anticipated average river flows higher than have been realized. The system is over taxed and it will be the responsibility of each of

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					<p>the 7 member states to conserve water so there is enough for all users as well as enough to sustain the ecological health of the regions the Colorado and its tributaries flow through. Per capita these counties (Washington and Kane) are some of the biggest water users in the West, with Washington County residents averaging over 300 gallons per person per day. Similar communities in neighboring states have cut their usage to half this amount. Also with future anticipated growth, agricultural use will also decline opening up large amounts for the two counties. The amount of water saved through conservation efforts would potentially equal the amount of the water that could be delivered by the full capacity of the LPP. I believe the developers of the LPP are using unrealistic estimates related to overall costs and revenues that will be generated. The estimated cost of \$1 – 1.7 billion to construct the pipeline appears dramatically low considering the length of the line and rough terrain it will run through. The expected revenues from impact fees, increased water rates, and property taxes also seems high. The potential for default by Washington and Kane counties on the expense paid initially by the state is a reasonable outcome. Not only will the residents of these two counties be expected to pay the full cost of the pipeline, but initially all Utah residents will be expected to pay for a pipeline that will have no positive impact on the vast majority of residents. There is a lack of transparency from key individuals who are pushing for the LPP to be built. Mike Noel, for instance, has a large financial interest with property that is adjacent to the water pipeline and has not been forthcoming with information and documents that would shed light on his potential conflicts of interest. These should be thoroughly examined prior to the project being approved. I also feel the true cost to the environment has not been adequately documented, additional impact studies should be conducted and the public better informed and educated on the full scope of this project. The projected course of the pipeline is near National Monument, wilderness areas, and public lands that should be protected. I appreciate the opportunity to share these comments with you. I have spent the past 15 years working as a river guide on the Colorado River in Utah and the Grand Canyon. I have seen the effects drought and climate change have had on the region. I feel conservation efforts and education will do more for the</p>

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					future residents of Washington and Kane counties than will an overpriced pipeline that may never deliver what the developers of the LPP promise.
Matt	Z	1084	1386	Request for Extended Comment Period	As a remedy for the above comments, we would suggest that the BOR plan additional scoping meetings with a realistic comment turn-around period, and that more information be made available via posters, the presence of specialists, and a question-and-answer period.
Matt	Z	1084	1387	Aquatic Invasive Species	Environmental issues also of great concern. The presence of quagga mussels in Lake Powell must be discussed realistically. Are current filter systems actually up to the task of filtering out the microscopic life stages of these animals? They have already proven an omnipresent danger to the Lake Powell and Lake Mead water piping systems, and efforts to control the mussels have largely proven ineffective. To what extent has this issue been considered in the LPP process? What measures could possibly be undertaken to prevent the mussels from clogging the pipeline, and colonizing the downline reservoirs and eventually the Virgin River? How will the needed maintenance/cleaning of the pipeline and associated prevention efforts add to the long-term pipeline costs? Again, more information from the BOR would help address the public's concerns.
Matt	Z	1084	1388	General	Comment 9-- In summary, this proposed project has suffered in the past from interagency squabbles, a lack of an understanding of legal requirements, inappropriate planning, poor analysis and reporting, and a lack of transparency and public input, to name but a few factors. At present, it appears to suffer from many of the same problems. To address this comment, the BOR should take a step back and realign its goals to be more realistic in terms or timelines, public input, transparency, analysis, reporting, and all other tasks associated with a project of this scope and the required EIS. Short cuts and abbreviated analyses might seem like a good choice at the present time, but can only lead to significant, costly litigation and delays in the near future.
Randy	Vorhies	1085	1385	Other	I'm a mech. engr. Quite familiar with the project. Please ensure a complete cost-benefit analysis and feasibility study is completed. This will allow a proper, professional determination of its merits. I'm concerned with the high cost, environmental damage, and if the water will be available in the decades ahead. Please

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					ensure these are addressed, as the public and politicians need much better information than they've been provided.
Thomas	Smith	1086	1384	Other	The overall costs (planning, coordination with the myriad agencies involved,EIS etc. all combine to make the proposed construction of the lake Powell pipeline one of the riskiest ventures from a cost effectiveness and feasibility standpoint that has ever been proposed in Utah. When embarking upon a venture of this magnitude any businessmen with the slightest bit of competence would ask fore at least a modicum of assurance regarding the projects feasibility. And yet owing to variables beyond human power to control or even accurately predict proponents of this project seem hell bent on going forward. A casual observer might even conclude that something smells here. . The controversy surrounding this project brings to mind another ill conceived plan several years ago to build a nuclear power plant near Green river Utah -,another parched, water challenged area of our state. Like the lp this plan all but ignored the various needs of other water users who had a viable claim to the precious water that would be taken from them in order to cool the power plant's. reactor.. When it comes to squandering Utah' precious water there seems to be no end to our insanity. So what then should we do about the projected growth to southern Utah and the ever increasing need for water. Sometimes the best plan is the simplest plan 1. Taylor growth to accommodate resources , not vice versa and employ measures to encourage water conservation and penalize water wasters. 2. look toward comprehensive planning that includes all stake holders and users in the area affected in spite of legal claims from agreements made long ago when conditions were radically different. , 3. above all ,be realistic,by considering the impacts of evaporation, dwindling snow pack and the needs of agriculture which are in fact becoming more predictable due to more sophisticated climate modeling. Hope this information helps !
Christy	Oprandy	1087	1383	Water Supply	1. Would the Kane County spigot (so to speak) from the LPP be turned off until such time that that Kane County and Kanab City needed the water. 2. When and if additional water is needed in Kane County and Kanab City would the Colorado River water be mixed with the wells now providing water to those entities and where would

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					it be stored? 3. With possible additional water will the Kane County Water Conservancy sell water to anybody with some kind of plan.
Peggy	Roefer	1088	1382	General	Please add me to the mailing list for information related to the Lake Powell Pipeline. Thank you.
Tim	O'Brien	1089	1381	Opinion - Opposed to Proposed Lake Powell Pipeline	Having followed this project and attended numerous hearings, open houses and Water Resource Board meetings i believe the LPP project should not proceed at this time based upon the following: 1. Need to perform an accurate study of the No Pipeline Alternative using updated population projections, assumption of local waters AFY of 138,000 by 2060,not the districts inaccurate estimate of 98,500 AFY), using aggressive but achievable secondary water treatment goals and costs as new technologies are rapidly being developed dropping costs significantly in recent years. Check with Las Vegas and go to to school on their water conservation initiatives over last 30 years. It's my understand their water use is the same as in 1989 despite a tripling in population. Also as a result, High Tech Water Conservation companies are converging on Las Vegas as an added boom to their economy. 2. Perform an updated financial analysis comparing pipeline costs of building the pipeline today versus the alternatives of waiting 10, 20 or 30 years. I think the interest savings of delaying the project over these periods of time will help define the actual total cost of the project over the entire repayment period. Need to translate these cost alternatives into understandable per household or per capital annual increases to our water bill costs.Then compare these costs to the cost of the No Pipeline Alternative I described above. 3. Make water rates based upon use and not partially hidden in or property taxes. Implement a conservation rate structure, meter and report and incentivize secondary and culinary water usage and inbed water efficiency requirements and monitoring systems like Las Vegas has. 4. Reevaluate climate change impact on Colorado River flow and its impact on the water rights allocation of all parties. Some water experts predict climate change impact to reduce flows by 30% by 2060. We cannot proceed without an accurate reevaluation of the security of Utah's junior water rights to those of the lower basin states and tribal entities in light of the predicted reduction in Colorado River flows.

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Malmquist,	Max	1090	1558	NEPA Process	We understand the new public scoping process has been initiated in response to the new LPP project design and with Reclamation as the new federal agency lead. The project previously proposed by the Utah Board of Water Resources (UBWR) with Federal Energy Regulatory Commission (FERC) as the lead agency was terminated in October 2019 after UBWR withdrew its application to the FERC. Because Reclamation has only recently been identified as the lead agency to conduct National Environmental Policy Act (NEPA) analysis for the LPP, Reclamation has an obligation to review and update existing analyses. In addition, Reclamation must consider that the LPP project has been changed to eliminate hydropower production as a primary purpose. Specifically, we request: 1. Reclamation should explicitly identify and make available to the public all existing studies considered in the evaluation of LPP project impacts relevant to the revised project scope and without simply referencing the FERC docket. 2. With the elimination of the hydropower component of the LPP, Reclamation must identify the source of power for LPP pumping needs, and include the impact of this power generation in the project impacts analysis.
Malmquist,	Max	1090	1560	Water Supply	Reclamation’s impacts analysis should rely on water supply projections for the Colorado River informed by recent climate models. Reclamation has previously downscaled projections from Global Circulation Models for the purpose of assessing future Colorado River water supplies . 1 Others have advanced this work by assessing the impact of warming as distinct from precipitation . 2 In the Colorado River Basin Study, Reclamation used the climate projection scenario averaged with other water supply scenarios. However, that methodology is not appropriate in the analysis for the LPP. Rather, Reclamation should assess impacts using a climate change -based water supply scenario independent of any other water supply scenario.
Malmquist,	Max	1090	1561	Water Supply	1. What is the water supply available for diversion into the Lake Powell Pipeline? Specifically, what is the probability that physical limitations on supply will result in insufficient availability of supply at the level of the LPP intake, required for the LPP to deliver water? While past Reclamation analyses have relied on the concept of “miracle water” (modeled supply to ensure full deliveries from the Upper Basin to the Lower Basin as required by the Colorado River Compact), it will be important for this

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					analysis to consider the extent to which required Compact deliveries will result in a Lake Powell water supply inadequate to fill the LPP. 2. What is the probability that Utah would be required to curtail water use in order to comply with the Colorado River Compact, and how would that curtailment affect the LPP water supply or the water supply for other Colorado River water users in Utah?
Malmquist,	Max	1090	1563	Water Supply	Reclamation’s analyses should clearly articulate the probability for each year over a 100 -year life of the LPP that the pipeline will have less than full supply. This information is critically important to local ratepayers and Utah taxpayers who will be required to repay loans taken to fund LPP construction. If the pipeline does not have full supply, water sale revenues may not be adequate to repay the loans, and additional debt repayment obligations may fall to ratepayers or Utah taxpayers. Regardless of whether Reclamation plans to assess the economic viability of the LPP, Reclamation should assess and clearly articulate the availability of the Colorado River water supply for the LPP so that stakeholders can conduct secondary analyses to understand the financial implications.
Malmquist,	Max	1090	1615	Wildlife	Audubon appreciates the due diligence of the U.S. Fish and Wildlife Service (USFWS) regarding Threatened and Endangered (T & E) species and habitat assessments, and performing effects determinations in the LPP Preliminary Draft Biological Assessment (BA) 3. While the BA found “no effect” on Western Yellow -billed Cuckoos and “not likely to adversely affect” Southwestern Willow Flycatchers, the survey data collected at the proposed LPP Paria River survey location (representing one of 16 riparian/ephemeral wash crossings of the proposed LPP) had detections of Yellow Warbler and Yellow -breasted Chat. While these are not T & E species, they are two of Audubon’s Western Water riparian specialist priority species that are showing regional declines . 4 Their presence indicates a somewhat healthy riparian habitat – which is disappearing throughout the region and needs to be protected whenever possible.
Malmquist,	Max	1090	1616	Wildlife	Therefore, in assessing direct environmental impacts, Audubon asks for inclusion of breeding bird surveys following USFWS guidelines at all potentially impacted riparian and ephemeral wash crossings as part of the EIS. With limited survey data, we

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					<p>encourage Reclamation and the state of Utah to conduct additional bird counts to inform estimates of bird abundance along the impacted sections of the proposed project. Audubon would also ask the EIS address mitigating impacts through normal Best Management Practices (BMP's), such as avoiding construction during the breeding season, removing invasive vegetation within the project area, planting and/or seeding native vegetation post -construction, and using sediment control features in riparian and ephemeral wash areas. The EIS should also consider recommendations previously made by the U.S. Army Corps of Engineers to assess other pipeline crossing methods, such as clear -spans stream crossings or use of jack - and -bore or other underground techniques at all or a majority of stream crossings to prevent or reduce temporary impacts. 5 Additionally, the EIS should include mitigation and post -construction plans that monitor success of reclamation/revegetation efforts and ensure that they are successful long term. Additionally, we ask Reclamation to consider the Audubon Water and Birds in the Arid West: Habitats in Decline 2017 study when assessing the project's impacts on bird species . 6 In this study, we document trends in bird species dependent on Colorado River riparian habitats, as well as vegetation changes and impacts. Populations of the following breeding birds, all riparian specialist species that were once common along the Colorado River and its tributaries, have experienced significant regional declines: Bell's Vireo, Yellow Warbler, Yellow -breasted Chat, and Summer Tanager . 7 Native riparian trees and shrubs such as cottonwood -willow ecosystems that provide productive habitat for birds and other wildlife are disappearing as a result of water development, including damming, flow regulation, surface water diversion, and groundwater pumping. Audubon's modeled relative abundance for Bell's Vireo, Yellow Warbler, Yellow -breasted Chat and Summer Tanager suggests that sub -basins differ in importance across the basin (see figure below). Relative abundance was estimated using a combination of eBird and Breeding Bird Survey observations. 8 Bell's Vireo and Summer Tanager are found throughout riparian corridors at lower elevations in Arizona, whereas both are found primarily on the mainstem Colorado River in Utah. Yellow Warbler and Yellow-breasted Chat are found throughout the basin. The presence and</p>

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Malmquist,	Max	1090	1617	Water Resources	To the extent that cities and water users in the basin are calculating Gallons Per Capita per Day (GPCD) water use data using different inputs or methodologies, Reclamation should undertake an assessment that allows for transparent understanding and comparison of the water use data and projections for Colorado River water users across the basin. Making the methodologies and calculations transparent will allow for improved decision -making and management of Colorado River water. Audubon understands that Reclamation, as a matter of course, does not consider GPCD in a project service area in determining whether a water development project is justified. Nonetheless, we observe that the Colorado River is a water supply in decline, federal taxpayers are increasingly funding water conservation in the basin to address the supply -demand imbalance, and most urban water users are reducing their GPCD at a rate of at least 1% per year . 11 Historically, Reclamation has not premised permitting new developments of Colorado River on the existence of robust water conservation measures in the project service area. In 2020 with massive shortages incumbent on water users in the basin and with hundreds of millions of dollars being invested in water conservation in other municipal areas using Colorado River water, Audubon urges Reclamation to consider whether water conservation has been maximized in the proposed project service area before approving a project.
Malmquist,	Max	1090	1618	Alternatives	In addition to a “No Project” alternative, Reclamation should also include a “Water Conservation” alternative based on investment in water conservation in the Washington and Kane County project service areas. Reclamation has documented significant decreases in per capita water use in urban areas supplied with Colorado River water, as well as enormous potential for additional water conservation in these areas. In the 2015 report “Colorado River Basin Stakeholders Moving Forward to Address Challenges Identified in the Colorado River Basin Water Supply and Demand Study”
Malmquist,	Max	1090	1619	Alternatives	Reclamation’s “Water Conservation” alternative should be defined as a project based on investments in water conservation in the LPP service area. To define this alternative, Reclamation should consider investment of the proposed funding for the LPP in projects and programs that reduce per capita water use in counties served by the projects. This should include, but not be limited to, assessing how investments

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					could maximize the municipal and industrial water conservation opportunities identified in “Colorado River Basin Stakeholders Moving Forward to Address Challenges Identified in the Colorado River Basin Water Supply and Demand Study”
Malmquist,	Max	1090	1620	Mitigation	“Colorado River Basin Stakeholders Moving Forward to Address Challenges Identified in the Colorado River Basin Water Supply and Demand Study”: “1. Increase outdoor water use efficiency through technology improvements and behavior change, and increase the adoption of low -water -use landscapes. 2. Increase the end -user understanding of individual, community, and regional water use. 3. Increase the integration of water/energy -efficiency programs and resource planning. 4. Expand local and state goal setting and tracking to assist providers in structuring programs. 5. Increase funding for water use efficiency and reuse. 6. Increase integration of water and land use planning.7. Develop and expand resources to assist water providers in water conservation efforts. 8. Implement measures to reduce system water loss with specific metrics and benchmarking. 9. Increase commercial, institutional, and industrial water use efficiency and reuse through targeted outreach and partnerships. 10. Expand adoption of conservation -oriented rates and incentives. 11. Expand adoption of regulations and ordinances to increase water use efficiency and reuse.” ¹⁷
Malmquist,	Max	1090	1621	Native American Concerns	Reclamation has a Trust responsibility to consult with Colorado River Basin tribes to assess the impact of the LPP on existing tribal water supplies as well as tribal water rights that have not yet been developed. Pointedly, the Colorado River Basin Ten Tribes Partnership Tribal Water Study documents tribal interest in being “included in regional water planning in order to facilitate tribal water development, minimize conflict, and improve overall reliability of the Colorado River System” .
Malmquist,	Max	1090	1622	Impacts	Overall, we hope to see Reclamation ensure considerations of today’s reality for the Colorado River Basin with recent studies on climate change and impacts to projected river flows and birds in the region, strengthened partnerships with tribes and NGOs in looking at solutions to meet water supply needs and conservation of natural resources, and economic impacts.

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cassandra	last	1091	1380	Visual Resources	BLM Field Office Visual resource management goals include “ minimize contrast to land scape and activities “ and also “projects must be unobtrusive”. With this in mind, the proposal to run high voltage power lines through an existing subdivision, that has underground utilities, goes against the language of the proposal. To stay in the language of the proposal the power lines would best be run along Sand Hollow Road. Sand Hollow Road has existing power lines. Following this course is only an approximate deviation of two miles, well within the five mile scope. Following Sand Hollow Road from Sand Hollow Reservoir northward would substantially limit the impact to the existing Dixie Springs Subdivision. Thank you for your consideration of visual impact, property value impact and the impact on the health of the residents in our neighborhood.
Kemp	Anderson	1092	1379	Opinion - Opposed to Proposed Lake Powell Pipeline	Please, conservation and sustainability, not an additional drain on an over -taxed system. No Lake Powell pipeline!
Jackson	Murphy	1093	1377	Opinion - Opposed to Proposed Lake Powell Pipeline	I’ve spent significant time researching the facts and opinions swirling around the Lake Powell Pipeline and it’s led me to this conclusion: The Lake Powell Pipeline should not be built. I’m short, it’s a multi -billion dollar project that would adversely effect the sensitive and already suffering Colorado River, saddle future generations with massive debt, and incentivizes extravagant water use in a desert faced with an uncertain climate future. Before it’s built, these issues need to be addressed. And after spending many millions of taxpayer dollars on lobbying and PR efforts, it’s all smoke and mirrors.
Susan	M	1094	1378	Opinion - Opposed to Proposed Lake Powell Pipeline	I am opposed to this project for two reasons. First, the devastating environmental impact of removing even more water from the already depleted Colorado River system. Second, the fiscal irresponsibility of asking tax payers to cover the cost of a project that may not have enough water to function for enough time to see a return on the investment. Although I understand that St. George and Washington County wish to grow, city planners need to accept the reality of their arid surroundings and come up with innovative ways to conserve the water they already have instead of

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					striving to "create" more water. They could begin by raising the price of municipal water to an amount that reflects its true value, rather than making it cheap and easy to waste. Saying NO to the pipeline is saying YES to conscientious, forward -thinking solutions that will help Washington County, Utah, and the entire Colorado River basin thrive in the face of climate change. We all want to continue living here. Let's be smart about how we do it
Brent	Prince	1095	1376	Opinion - Opposed to Proposed Lake Powell Pipeline	I am writing the email in OPPOSITION to the lake Powell Pipeline. Things I am worried about this pipeline would create. Digging through the dirt of Southern Utah will disturb unmarked indian burial sites. Digging will disturb the natural rock, hillsides and flora and fauna. never to be the same again. We will be disturbing the ground where the mule deer migrate from Summer to Winter patterns. The water will make the growth of Southern Utah explode to the point where we have to deal with air pollution which will cause the beautiful skies we have to be like driving into Las Vegas. Southern Utah is a treasure . This pipeline will make it grow to the point so many more people will move here. hike here, leave their trash and pollution as a side effect. The roads in Southern Utah do not keep up now with the influx of growth. It will be even worse if we have more water which makes more growth. the cost will be so high for the project it will increase tax and make the tax burden go on to the next generation. Southern Utah is a desert, we should survive on the water we have here not have to have it piped in.
Tom	Baker	1096	1375	Opinion - Opposed to Proposed Lake Powell Pipeline	Please shut down this ill conceived project before another taxpayer dime is spent on it. The Colorado River has been over allocated due to flawed studies. Climate change is making the possibility of drafting the river impractical at times due to low flows. This is way too much money to spend on a project that may not be reliable in the future. Conservation and slow/limited growth is the answer. The entire USA population doesn't need a home in Washington County, UT. Do the current residents a favor and stop this project now.
Bill	Cooper	1097	1374	Electric and Magnetic Fields	am a homeowner who lives on 3400 W in Hurricane Utah. I am writing to voice my concerns about the proposed power poles being placed on the east side of the street. I am very opposed to this. This will affect my property value as well as damage my

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					existing landscaping which includes a pool. I do not want a pool underneath power lines. These lines need to be buried underground for the mile that they would travel down 3400 W. Some of this cost would be mitigated by the cost of you removing and repairing block wall fences which line more than half of this proposed route.
Laila	Bremner	1098	1373	Opinion - Opposed to Proposed Lake Powell Pipeline	As a citizen of UT, I asked you to please stop the diversion of the Colorado river and leave it where it belongs. We cant keep violating Nature & hope "everything will be alright". Even for these so called "future generations". We are already living the consequences of the destruction of Nature we have already done...it is time to open our eyes and do something to protect the little that we have left. There is a way to do this by using our brains on solutions on how to help Nature, climate change and OURSELVES!!! Also, as Mental Health worker, the destruction of Nature and overpopulation is destroying our own mental well -being. These are not just my words, studies have been done on how this is affecting our mental health. When we just focus on short term solutions (such as watering un -needed grasses in a desert state), we should focus in teaching people to conserve water, the savings they will have, how beautiful these zero=escape lands look, giving incentives for these kind of constructions in businesses and homes, etc. And while we work in maintaining and expanding our wild lands, protecting the birds, wildlife animals and RIVERS so we can all maintain our mental health by having the opportunity to experience peace/quiet in an overpopulated world!
Larry	D	1100	1372	Opinion - Opposed to Proposed Lake Powell Pipeline	Please reconsider this "boondoggle". The west cannot support this type of future water use on any extended basis.
Kelly	McAdams	1102	1370	Visual Resources	My wife and I attended the scoping meeting a few nights ago on January 8th. I think most of us in the audience were disappointed that instead of discussing the proposed power lines that will tower over our newly built homes you instead discussed the pipeline and it's routing that is fifty to a hundred miles from our community. When we asked you about the power lines after the meeting you responded that we should have done our due diligence before we purchased our homes and that we should sue

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					our title companies for not alerting us to this eventuality. You also said that this power line is on the plat map and that you have an easement - well doesn't every house have an easement for utilities and why would we expect you to build high voltage lines in a neighborhood with underground utilities? Well some of us checked with the city of Hurricane the following day and in fact these lines are not on the plat map. In fact the City of Hurricane was completely unaware of your plans. FYI I met a man that evening at the meeting and he just moved into a new house TWO DAYS before the meeting not knowing that his new home would have hideous, cancer causing high voltage power lines installed in his front yard! Why has this been kept a secret?
Kelly	McAdams	1102	1371	Electric and Magnetic Fields	We bought our beautiful new home here in July 2018 only to be told a few weeks later by a neighbor about your plans to put these lines practically in our front yard. This entire subdivision has underground utilities and you and your agency are planning to ruin our street and create a huge health hazard to us. As we speak there are new homes being built on this street and unsuspecting buyers are unknowingly purchasing these homes because you are and have been neglectful for not posting a large sign/map with your intentions where people in the neighborhood could see what you are intending to do to our home values and the public health. It seems odd that you have been so secretive. There are other alternate routes for these lines but from your demeanor at the scoping meeting it seems you have made up your mind to take the easiest route which is right through our neighborhood. There are about 150 homes that will easily be in the electromagnetic zone and we can expect to develop serious illnesses if we don't move elsewhere. I'm confident these neighbors and others will gladly join in a class action suit against you and other agencies that have made no effort to notify others in the vicinity of these plans. If you lose this suit and each homeowner is awarded \$200,000 (or perhaps far more if they develop cancer) then that's about a \$30 million expense you should seriously consider for degrading our neighborhood. There are also many people that previously owned these lots, sold, or built these homes that will be dragged into legal proceedings because they didn't disclose this to us and it's all really because you were neglectful for not posting this publicly

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Kristie	Burns	1103	1369	Visual Resources	To whom it may concern, My name is Kristie Burns and I live at 2866 SO 3400 W. Hurricane Ut. where there is talk of placing huge power lines right in front of our house down our road. We just bought here a little over a year ago and no one told us, our realtor didn't know our builder didn't know and the Hurricane city didn't know. People are still buying lots on our street and they are not finding any of this out also. We were going to buy in Boulder City NV, but I can't be around big power lines I get really sick now I find out you want to put them in front of our house how terrible. There is another lady on this street that has a pacemaker and can't be around the big power lines also that would kill her. Please put them up on the mountain behind us that would be an easy fix and all of us around here wouldn't have to band together to do a class action suit that would slow up your progress. I know in the future we will need more water in this area but please please please help us. Thanks Kristie
Peery,	Lexi	1104	1368	General	Lexi Peery with The Spectrum in St. George here. Since the public scoping period closes today I'm wondering if there's someone I can talk to about next steps/how many comments were submitted? Also if I could be added to the email list for future emails that would be great.
Kimberly	Cooper	1105	1367	Visual Resources	I live on 3400 W and have landscaped my backyard which includes concrete, a block wall and a pool. I will expect my yard to be compliant to all safety regulations such as overhead powerlines and pools. Several of the houses on 3400 W have pools that may also be affected. All of the houses have block walls in place, sprinklers and landscaping completed. There are 17 houses on the North of Dixie Springs Drive that have their side/back yards facing 3400. There are another 14 houses south of Dixie Springs Drives that have their front yards facing 3400. Altogether this is under a mile. These power lines need to be run underground in this section. I am including pictures of the street and houses on the North part of 3400. This project is causing me stress. I am retired and this is my retirement home. I absolutely would not want to live under power lines. I would not have bought this house. There are other routes that can be used or the lines put underground that would not cause us to lose value in our home and face health issues. Not to mention there are several bus stops where the kids wait and lots of pedestrians use 3400 W and should not be subject to these

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					health concerns. These power poles will ruin my view and anyone who lives east of 3400.
April	Johnson	1106	1362	Opinion - Opposed to Proposed Lake Powell Pipeline	This is one of the dumbest, most tone -deaf proposals I have had to write comments about
April	Johnson	1106	1363	Alternatives	2) CONSERVATION BEFORE PIPELINE. Utahns are some of the largest water users in the country with studies showing they use up to twice as much as the average user in other states. I am not thrilled with the stress SW Utah is putting on the Virgin River, but why have few water conservation measures been implemented? Why are St. George and Washington County residents allowed to have lawns and golf courses?
April	Johnson	1106	1364	Recreation	CONFLICTS WITH GLEN CANYON REC AREA & GRAND CANYON NATIONAL PARK HEALTH AND RECREATION. How are lower lake levels going to affect the viability of the Long Term Management Plan that was just signed in regards to dam releases into the Grand Canyon? Won't we fail to meet many of the environmental targets we seek to meet if flows are reduced or made to be more homogeneous? It's already hard enough to have enough water flowing out of the dam in order to build beaches, distribute organic matter, and maintain some semblance of health in the ecosystem downstream. You would put this plan in jeopardy that has cost taxpayers millions of years over decades to craft? That is blatantly irresponsible. I'm already concerned about the health of the Grand Canyon ecosystem. I have studied the effects of dams extensively and this section of the CO River is already deeply compromised. We are spending millions to study the river corridor and working hard within what little wiggle room we've squeezed out of dam operators to ensure commercial and private boaters have beaches to land on, humpback chubs have enough bugs to eat, and to try to encourage native plant colonization vs. widespread tamarisk invasion. The LPP puts all of this progress in jeopardy and vastly limits what few management tools we have left to preserve the health of this ecosystem downstream of an inherently detrimental dam. One of my greatest concerns with this proposal is the negative effects it will have on the management of

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					Glen Canyon Dam and the river corridor downstream of the dam. If enough flow isn't released and in a way that at least relatively mimics natural flow (including peaks and recession rates), this section of the river corridor is going to die - no longer supporting boaters, native plants, fish, wildlife, or invertebrates. When we fail to mimic the natural hydrograph, riparian vegetation chokes shorelines, streamlining the river corridor, eliminating backwater eddys, and altering geomorphic processes and variation in terrain. This speeds up flow, changes the distribution of organic matter, eliminates feeding and spawning areas, and perpetuates such effects further downstream.
April	Johnson	1106	1365	Other	4) HIGH COST TO LOCALS.
April	Johnson	1106	1366	Request for Shapefiles or Maps	6) AND ANOTHER THING. How are we to comment on the scope and data gaps if we don't have a large scale map or GIS shapefiles to compare with our own interests?
Michelle	L Bonner	1107	1354	Alternatives	Include a “conservation” alternative to the EIS
Michelle	L Bonner	1107	1355	Water Supply	Evaluate the costs and yields of major conservation methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water -wise landscaping, incentives to convert existing properties to water -wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc .
Michelle	L Bonner	1107	1356	Water Supply	• Include updated information: the recommendations in the state audit of the state’s projections of water needs, the more recent lowered population projections, the recent Department Water Resource study of higher conservation potential, and consider all water supplies in Kane and Washington County .
Michelle	L Bonner	1107	1357	Climate Change and GHGs	Determine the high -probability of the long -term Colorado River flow for the LPP under a range of future climate conditions. Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources’s(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis

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					the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP's water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water .
Michelle	L Bonner	1107	1358	Other	Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents. The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS .
Michelle	L Bonner	1107	1359	Mitigation	Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure for the long -term.
Michelle	L Bonner	1107	1360	Water Law	<ul style="list-style-type: none"> Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water rights use all of Utah's recalculated Colorado River allocation that considers the high probability of long -term Colorado River declining flowsProvide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LPP. Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact .
Michelle	L Bonner	1107	1361	Aquatic Invasive Species	A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River .

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Brian	Whitehead	1108	1353	Opinion - Opposed to Proposed Lake Powell Pipeline	We need to start getting realistic about the future of water in the region. A pipeline will not fix climate change. It is not worth it to invest in a project this expensive if the Colorado River Basin will continue in drought. Maybe we should fill Lake Mead first and build a pipeline from there? Maybe we should realign water rights with a 21st century scientific view? Either way, the Lake Powell Pipeline is a bad idea
Rikki	Almaraz	1109	1352	Opinion - For Proposed Lake Powell Pipeline	Washington County, Utah supports the project and appreciates the opportunity to provide scoping comments for the Notice of Intent for the Lake Powell Pipeline (LPP) EIS. The LPP is needed to meet the future water demands of our county in the near future possibly as early as the end of this decade. Each year Washington County is one of the fastest growing counties in the nation. Over half of our growth is from internal population growth. The remainder comes from people wanting to move to our beautiful area with the positive climate, low crime rates, and active community we all love. If not for historic water development, our community would not have its vibrant nature. In order to continue being who we are, we will need the water provided by the LPP.
Kathleen	Van Vlack	1110	1351	General	LPP EIS Document s 1. Official Southern Paiute Statement for the Lake Powell Pipeline EIS (Southern Paiute FERC EIS Appendix) Link: https://drive.google.com/open?id=17deyc69HPC14luLO1TsPEuGvkUM1o76P 2. Cooperating Agency Review: Draft Environmental Impact Statement for Hydropower License, the Lake Powell Pipeline Project (SPAC Review of the Draft FERC EIS) Link: https://drive.google.com/open?id=12aaUFLzThHv_W2rrIStrdtfUZZVnx8J 3. Draft Supplement Analysis for the Final EIS for the Nevada Test Site and off -Site Locations (NTS Supplement Analysis) Link: https://drive.google.com/open?id=11R8joRezmkNsXyWoM-8P6wiBB14IVQT
LISA	RUTHER FORD	1111	1534	General	However, The Kanab Creek/Virgin River Basin ¹¹ report shown currently on the state's data portal is from 1993 but is listed as: The River Basin Plans are the latest in the "Utah State Water Plan" series and are intended to guide and inform water - related planning and management within the 11 river basins of the state of Utah. What other information is outdated and is being used to justify the proposed LPP.

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LISA	RUTHER FORD	1111	1570	Socioeconomics	BoR DEIS Request: BoR should consider what effect the licensing of the LPP will have on the subsidizing of water through property taxes which encourages water waste not conservation. “Reclamation is requesting public scoping comments to identify significant issues or other alternatives to be addressed in the EIS” according BoR’s December 6, 2019 NOI. The property tax issue is a “significant issue” in our county that relates directly to the proposed LPP since property tax revenues are one leg of the funding and encourage water waste.
LISA	RUTHER FORD	1111	1614	Aquatic Invasive Species	BoR DEIS Request: Analyze the costs associated with treating a possible infestation of quagga mussels in the proposed LPP, our county ’s regional pipeline , our county ’s water distribution system, and homes from the LPP water.
LISA	RUTHER FORD	1111	1623	Socioeconomics	BoR DEIS Request: Review the cost versus benefits of the new LPP project without the PSP to ensure this project is in the best economic interests of the state, our county and citizens.
LISA	RUTHER FORD	1111	1624	Water Resources	BoR DEIS Request: Study the cumulative effects of the two blocks of water (Green River and LPP) together not separate.
LISA	RUTHER FORD	1111	1625	Climate Change and GHGs	If climate change continues, as we expect it will, it will prove challenging to Lake Powell. Upper Basin CR states have agreed to use upper reservoirs to prop up Lake Powell’s level. But climate change may very well put stress on the upper reservoirs, too, thereby leaving them unable to support Lake Powell effectively while still maintaining their own viability. If this happens, the whole premise by the Upper Basin states upon which the Upper Basin DCT is based may be at risk. What will be the effect on those reservoirs? Will those effects leave them insufficient to support Lake Powell?
LISA	RUTHER FORD	1111	1626	Alternatives	Add a water conservation alternative to the EIS studies.
LISA	RUTHER FORD	1111	1627	Socioeconomics	Evaluate the costs and yields of major conservation methods.

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LISA	RUTHER FORD	1111	1628	Water Law	Determine the probability that the LPP's water right is highly secure for a permanent water project.
LISA	RUTHER FORD	1111	1629	Water Resources	Determine the high -probability long -term Colorado River flow for the LPP under a range of future climate conditions.
LISA	RUTHER FORD	1111	1630	Socioeconomics	Determine how the specific LPP costs will be paid back to the state, including the tax burden on residents.
LISA	RUTHER FORD	1111	1631	Water Law	Provide the missing data on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has water in the Green River tributaries to exchange with Reclamation for the LPP
LISA	RUTHER FORD	1111	1632	Aquatic Invasive Species	A study on costs over the long term risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure. The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infestation the Virgin River system
LISA	RUTHER FORD	1111	1633	Climate Change and GHGs	Update the Federal Energy Regulatory Commission (FERC) studies to include the findings and recommendations from the current Reclamation studies on climate change
LISA	RUTHER FORD	1111	1635	Alternatives	The EIS should evaluate all plan alternatives against worst -case scenarios for future water availability across 10, 20, 50 and 100 year timelines.
LISA	RUTHER FORD	1111	1636	Alternatives	It should evaluate alternatives across a
LISA	RUTHER FORD	1111	1637	Alternatives	range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems —including national wildlife refuges and critical habitats —and endangered species.

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Robert	Adler	1112	1344	Purpose and Need	For purposes of NEPA analysis, this statement inappropriately and unlawfully conflates the project’s real purpose and need with the one specific method UBWR proposes to meet that purpose and need. This inappropriately narrow formulation of the project purpose and need improperly constrains the range of alternatives that might be considered in the EIS. NEPA requires consideration of all reasonable alternatives to fulfill project purposes, and a rigorous comparison of the environmental impacts and feasibility of those alternatives. Properly stated, the actual purpose and need for the proposed project is only a portion of the above statement: to meet legitimate present and future water demand and to enhance the reliability of the region’s water supply relative to that demand. Building a pipeline to convey water from Lake Powell to Washington and Kane Counties is simply one potential alternative to address that real project purpose and need. As discussed below, this more functional statement of project purpose and need facilitates a broader range of project alternatives the agency is required to consider in order to comply with NEPA. Relatedly, to assess project purpose and need adequately, the EIS must evaluate carefully the existing and projected future demand for water in the affected region. An inflated statement of future water demand will bias the NEPA analysis in favor of the proposed pipeline or other supply -side alternatives. To ensure that the proposal is not justified based on inflated population or water demand projections, the lead agency must scrutinize (and verify or modify) all of the data, assumptions, and models used to generate those projections independent of the UBWR or other state, regional, or local agencies.
Robert	Adler	1112	1345	Alternatives	The published project information suggests that only two closely related alternatives are being considered: two geographically proximate pipeline routes. Once the project purpose and need is stated more broadly and functionally, however, as required by NEPA, a wider range of alternatives becomes apparent. NEPA requires the agency to adopt this broader and more functional approach, and to define and consider project alternatives accordingly. Given that the underlying project purpose is to ensure a stable and sufficient water supply for Washington and Kane Counties, a much wider range of alternatives must be considered in the DEIS to fulfill the purposes of NEPA (in addition to the mandatory “no action” alternative). These include all feasible water

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					demand management measures and strategies for the affected region. In particular, to fairly compare alternatives to meeting project purpose and need, the DEIS should evaluate how much water demand could be reduced by investing the same financial and other resources as would be required for the proposed pipeline into regional water efficiency improvements .
Robert	Adler	1112	1346	General	To compare project alternatives properly, the DEIS must evaluate the financial costs and feasibility, and the efficacy and reliability, of each alternative. This is particularly important for this proposed project because of controversy and uncertainty about the actual construction and operation costs of the proposed pipeline. The agency has a responsibility to independently verify project cost estimates, and to present the public with a range of realistic project costs (best -case, most likely, and high). This range of cost estimates should then be used to explore the potential water savings that could be obtained through similar investments in water conservation. Such investments could obviate the need for a more environmentally damaging pipeline project .
Robert	Adler	1112	1347	General	A second critical aspect of efficacy for this project is the strong possibility that insufficient Colorado River water will be available to fulfill the intended project purposes, or to fulfill them fully. Under the existing Interim Shortage Guidelines for the river, and due to severely declining storage in Lake Powell, Lake Mead, and other basin reservoirs, some of the Colorado River Basin States already face requirements to curtail existing use of their apportionments under the Colorado River Compact. More significant curtailments may be required in the future to deal with this “structural deficit” in the amount of water allocated under the Law of the River and reasonably foreseeable future water supplies. The Shortage Guidelines are due for reconsideration and potential revisions in the coming years. Under the terms of the Colorado River Compact itself, as well as under future Shortage Guidelines, the Upper Basin States may also face curtailment requirements in the future, potentially affecting Utah’s ability to use its remaining Compact apportionment.
Robert	Adler	1112	1348	Purpose and Need	A proper evaluation of the efficacy of the proposed pipeline to address the project’s purpose and need requires a detailed analysis of the full range of potential runoff and storage projections in the Colorado River and its storage system over the full life of the

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					proposed project. These projections should be used to conduct a risk assessment and analysis of the implications for project operation and efficacy. Stated bluntly, an empty or only partially full pipeline will not address the water supply needs of Washington and Kane Counties as well as project proponents suggest. Because the DEIS must compare all feasible project alternatives fairly, that analysis must compare the reliability of the alternatives in addition to other factors. Given uncertainty in basin water supply, investments in water efficiency may be considerably more reliable in meeting the project's purpose and need than investment in the LPP
Robert	Adler	1112	1349	Impacts	I have not studied the proposed pipeline route and its environmental factors sufficiently to identify the full range of environmental impacts that should be addressed in the EIS. At a minimum, however, the DEIS should address: <ul style="list-style-type: none"> • All construction impacts to soil, water, riparian areas and wetlands, vegetation, habitat, and fish and wildlife, including construction-related noise. • Impacts to wildlife migration corridors. • Impacts to all threatened and endangered species. • Impacts, permits, and mitigation requirements for all of the river crossings. • Operational impacts, including noise from pumping stations and other operations.
Robert	Adler	1112	1350	Impacts	<ul style="list-style-type: none"> • Impacts to the entire downstream Colorado River ecosystem from further water depletions in a system that is already over-allocated and hydrologically and ecologically stressed by protracted drought and climate change. • The impact of additional storage depletions on the ability of BOR and other river managers to conduct future river restoration flow experiments in the Grand Canyon, the lower river corridor, and in Mexico (including the ability of agencies to implement existing restoration and mitigation programs, some of which are designed to address past impacts on, and mitigation requirements for, threatened and endangered species). • Impacts to Tribal lands and resources, including archaeological, religious, and other cultural resources. • Aesthetic and other impacts to wilderness and recreation.
Kathy	Merrick	1113	1340	General	l. The project is now 14 years old and during that time the projected cost has more than doubled to close to \$2 billion, \$40 million of which is Kane County's share of 4000 acre feet. Kane County has a population of 7000, 5000 of whom live in Kanab which does not need the water from the LPP as the city has its own water supply

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					from the Kanab Creek Aquifer. I have been told by a former county commissioner that the residents of Kanab will not be responsible for helping pay the debt, but I don't believe that is an accurate estimation of the rate increases Kane County residents will face in the future to pay for our share of LPP water. The rest of the debt will fall on the residents of Washington County, primarily those in St. George. The claims regarding cost, future supplies, and future usage for both Washington and Kane Counties are educated guesses, not science, and while I realize an educated guess is the best one can hope for, there are differing opinions as to how the results of the studies regarding supply and usage were reached. Therefore, there is a need to reexamine and update these figures.
Kathy	Merrick	1113	1341	Aquatic Invasive Species	2. Another issue that must be addressed is the possibility of an invasive species entering the water system, particularly quagga mussels. In August of this year I was told by Kim Wells from the office of the Utah Division of Water Rights that no formal plan for dealing with this potential problem had been submitted to the Army Corps of Engineers. I know a filtration system will be in place and that some sort of biopesticide will be necessary for microscopic matter that escapes these systems, but this is where the public's concerns lie. The use of chemicals in a culinary water supply, even if it is chlorine, makes people nervous. Further studies and information should be available before this process becomes part of the LPP.
Kathy	Merrick	1113	1342	Alternatives	I question if all the alternative options for wise water usage have been considered before resorting to a massive and expensive water project that will leave residents of two counties in southern Utah holding the bag.
Kathy	Merrick	1113	1343	General	. I am aware that the two hydropower components have now been eliminated, saving \$100 million in cost and changing the environmental impact of the LPP project, but the income from those hydropower components was to defray some of the cost of the pipeline. Where will that money be made up, or will an increased tax burden simply fall on residents of Washington and Kane county
Helene	Jorgensen	1114	1337	Opinion - For Proposed Lake Powell Pipeline	I support the No Pipeline Alternative, because: 1) The pipeline is unnecessary. Implementing smart growth and water conservation will ensure that local communities in Kane and Washington counties, Utah have sufficient water in the

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					future. 2) The costs of constructing the pipeline are exorbitant, and will make it unaffordable for many residents to continue to live in Kane County. As a result, there may be a decline in the population of Kane County if the pipeline were to be built, making it even more redundant. 3) The proposed pipeline (both Highway Alternative and Southern Alternative) bisects areas rich in Native American cultural sites and artifacts. Surveying, cataloging, and protecting Native American art and artifacts in order to be in compliance with Antiquities Act of 1906, the Native American Graves Protection and Repatriation Act of 1990, and the Archaeological Resources Protection Act of 1979, would be an extremely extensive process that will take numerous years and significantly increase the costs of the projects.
Helene	Jorgensen	1114	1338	Request for Extended Comment Period	Public Scoping period extended It is premature to complete the public scoping, prior to conducting a comprehensive cost analysis of the project. The Bureau of Reclamation should, as a very first step, conduct a cost analysis of the project, including construction, and future operating and maintenance costs. The public scoping period should be extended until after the cost analysis has been concluded and shared with the public. Furthermore, the Bureau of Reclamation has provided no information on the project for the public to provide detailed comments. The scoping information fails to provide basic information, such as the length of the pipeline for each Alternative, the projected duration of the project; the projected costs of the project; and the classification and size of affected land (such as private, BLM, national recreation area, national monument, Indian reservation, etc.)
Helene	Jorgensen	1114	1339	General	The Environmental Impact Assessment should include the following information: A) Add a “water conservation alternative” to the list of alternatives. B) Detailed plan as to how to protect Native American cultural sites, grave sites, and artifacts. C) “Development plan” for the project; D) Detailed cost analysis of construction, operation and maintenance; E) Water exchange contract; F) Description of the Kane County (KCWCD) side pipeline (spur), including an explanation of location and identification of the exact termination point.

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John	Hiscock	1115	1325	Request for Shapefiles or Maps	Detailed maps of the proposed alternative LPP routes should be available to the public in various formats as soon as possible. The maps of the LPP project alternatives provided by the BOR to date are far too large scale for members of the public to meaningfully assess the project 's potential impacts on lands, resources and values associated with those routes and lands, and management of those lands mandated by law, regulations, and administrative policies such as Bureau of Land Management resource management plans. Detailed maps, including jurisdictional and land management boundaries should be developed, printed and made available on a small scale basis (preferably as detailed as 7.5 minute scale) as part of the development of the DEIS, or preferably even before. In addition, digital GIS project maps on a similar scale should be produced and made available as soon as possible. I request that such digital GIS maps be made available on the ArcGIS database that can be found at https://www.arcgis.com/home/webmap/viewer.html?url=https://services1.arcgis.com/ . Providing the public with such digital GIS map references will allow layering of other map resources at that site that will greatly enhance meaningful participation and comment. Without the foregoing geospatial information, the public will encounter significant impediments to providing worthwhile comments on a project of this scale and complexity
John	Hiscock	1115	1326	Purpose and Need	The purpose and need for the LPP project should be fully described and assessed as part of the DEIS process. The purpose and need for this wa ter delivery project must be justified and supporting, well founded studies and models presented. Importantly, alternative approaches for meeting needs must be considered, discussed, and all viable alternatives presented. Water conservation possibilities to provide for water as far into the future as a new consumptive diversion and pipeline should be considered as alternatives to the LPP. Washington County, and especially Kane County are lacking developed and proven water conservation plans and implementation that has proven viable in other large and small metropolitan areas in the southwest. Such alternatives for particular geographic portions of the proposed service area should be considered - i.e. alternatives for Kane County or Washington County distinctly and separately. Other alternative approaches to meeting water needs should also be

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					considered, such as reevaluated use or conservation of presently available agricultural irrigation water.
John	Hiscock	1115	1327	Impacts	The DEIS should of course evaluate all potential impacts on the resources and values of lands that the LPP may cross, or that may be collaterally affected on adjacent lands. This includes consideration of impacts on natural (geological, wildlife, botanical, soils, drainages, etc.) and cultural (archaeological, historical, ethnographic, etc.) resources, and impacts on identified values on such lands (recreation, wilderness, grazing, etc.).
John	Hiscock	1115	1328	Lands and Realty	The DEIS must closely consider any potential impacts on special designation lands that the LPP alternative routing proposals may cross, or that lie within an adjacent zone of possible adverse effect. With the project maps currently available it is not entirely possible to ascertain the full list of special designation lands that need special consideration. However, at this point in time, I will endeavor to list and address those areas that appear to be within a zone of potential adverse effects.
John	Hiscock	1115	1329	Lands and Realty	Glen Canyon National Recreation Area (GLCA) (National Park Service (NPS)) The intake facilities for the LPP clearly lie within the boundaries of GLCA. Furthermore, the LPP and associated powerline components of the project also appear to be within GLCA. As a congressionally, statutorily designated area, all legally protected resources and special values of said area must be identified and closely evaluated to confirm that the LPP project does not contradict statutory and regulatory mandates and goals.
John	Hiscock	1115	1330	Lands and Realty	Grand Staircase Escalante National Monument (GSENM) (Bureau of Land Management (BLM) Although it does not appear that the LPP project alignment proposals cross the recently downsized GSENM, the project proposals do cross lands within the originally established GSENM. The presidential proclamation downsizing GSENM has been legally challenged and action on that challenge is pending in the courts. Due to the uncertainty of the outcome of that challenge it is arguable that the LPP project proposal and its potential impacts on the original GSENM and its legally protected resources and values must be evaluated. Not doing so, could result in the need to completely revise the LPP NEPA process at a later date should the GSENM downsizing proclamation be overturned by the courts.

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John	Hiscock	1115	1331	Lands with Wilderness Characteristics	Wilderness Study Areas (WSAs)(BLM) Again, with the maps currently available it is not possible to ascertain whether WSAs are crossed or proximate to the LPP proposed routes. These specially designated areas, and their resources and values should be closely, and specifically considered if possibly impacted.
John	Hiscock	1115	1332	Areas of Critical Environmental Concern (ACEC)	Areas of Critical Environmental Concern (ACECs)(BLM) At least one, and possibly more existing BLM ACECs are crossed by the LPP proposed routes, or close to such. That which is crossed by one of the LPP route alternatives is the Kanab Creek ACEC in the Arizona Strip Field Area. This ACEC was previously established after special consideration in BLM planning processes. It now appears that the LPP alternative that might cross this area includes consideration of downsizing of the ACEC. As the ACEC was previously justified after extensive evaluation, a change in status or size of the ACEC is highly questionable. The BLM’s previous decision on its designation should not be overturned or modified unless well founded justifications for such action are detailed in the DEIS.
John	Hiscock	1115	1333	National Trails	Old Spanish National Historic Trail (OSNHT)(BLM) As proposed and being considered, the alternative pipeline route s appear to closely follow and cross the Old Spanish National Historic Trail (OSNHT) legislatively established by Congress in 2002. See Pub. L. No. 107 -325 (Dec. 4, 2002), 16 U.S.C. §1244(a)(23). More specifically, the LPP alternatives follow and cross the designated OSNHT at several locations that can be identified on maps prepared by the federal Trail administrators available at:
John	Hiscock	1115	1334	National Trails	As congressionally designated, the OSNHT is part of the National Trails System, and thereby subject to the mandates and goals of the National Trails System Act (NTSA) – Pub. L. No. 90 -543, as amended through Pub. L. No. 111 -11, and codified as 16 U.S.C. §§1241 -1251. Administration of the OSNHT has been delegated by the Secretary of the Interior, jointly, to the National Park Service (NPS) and the Bureau of Land Management (BLM). The Federal Trail Administrators – NPS and BLM - have general responsibility and authority for overall Trail planning and guidance and furtherance of NTSA mandates and goals. Federal land management agencies and subsidiary management units have responsibility and authority for land use planning

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					<p>and implementation as related to the Trail on their individual Federal land management units. The LPP alternatives cross four separate Federal land management units. Those are: the BLM Kanab Field Area; the original BLM Grand Staircase Escalante National Monument (GSENM); the BLM St. George Field Area; and, the BLM Arizona Strip Field Area. In addition, one of the LPP alternatives also crosses Federal trust lands of the Kaibab Paiute Indian Reservation cooperatively managed by the Kaibab Band of Paiute Indians and the Bureau of Indian Affairs. Planning and management of the OSNHT corridor, OSNHT resources and values, and evaluation of potential impacts on the Trail, Trail corridor, and its resources and values, are subject to the mandates of the NTSA, the statutorily required comprehensive management plan for the OSNHT, and regulations and policies of the land management agencies. Primary mandates and policies include: - the NTSA; - the Old Spanish National Historic Trail Comprehensive Administrative Strategy, BLM & NPS (2017); and, - BLM Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Public) (2012). It is the position of PNTS that all potential LPP project impacts on the OSNHT and its resources and values must be evaluated; precluded where statutorily mandated by the NTSA, and otherwise minimized or mitigated to meet the goals of the NTSA. The existing BLM resource management plans for the aforementioned BLM field areas and GSENM have failed to include, only partially include, have not been updated, or are substantially inadequate in , planning and management of, and for , the OSNHT corridor and OSNHT resources and values. In most instances th e RMPs have not even taken the congressionally, statutorily mandated OSNHT completely into account, and inadequately followed BLM NHT policy guidelines to ensure fulfillment of the NTSA. To date, BLM has failed to follow the provisions of its own policy manual on NHT's (BLM Manual 6280) in ma ny regards in relation to the OSNHT. These failures include: failure to comprehensively inventory a nd maintain dat abases on OSNHT resources and values (see BLM Manual 6280, Chapter 3); failure to incorporate NTSA mandates, protections, and goals in land management plans (RMPs), including establishing justifiable Trail corridor widths that protect resources</p>

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					and values (see BLM Manual 6280, Chapter 4); failure to manage the OSNHT including NEPA guidance for all proposals (see BLM Manual 6280, Chapter 5); and failure to monitor OSNHT resources and values (see BLM Manual 6280, Chapter 6). It needs to be made absolutely clear that NHTs are not only preserved/protected pursuant to the Mandates of the NTSA for on the ground resources, such as historic trail traces and archeological remnants, but also, just as importantly for the recreational and educational values of their corridor landscapes. The NTSA clearly mandates that all portions of NHTs crossing federal public lands are “federal protection components ” of such Trails.
John	Hiscock	1115	1335	General	Economic I mpacts The economic impacts of the LPP proposal must be th oroughly examined and considered. T he estimated cost of the project is highly controversial. At the scoping meeting held in Kanab, Utah it was explained that the estimated cost of the project is in the neighborhood of \$1.5 billion dollars. Other reputable sources have estimated the cost as high as \$3 billion or more. Reputable estimates must be presented for further public consideration. Furthermore, how the project costs would be passed on to taxpayers must be explained and the impacts of such costs must be evaluated. Many of us in Kane County are greatly concerned that the high costs of the project, in comparison to its professed need, will burden resident taxpayers for decades and lead to other adverse economic consequences for the County and its residents.
John	Hiscock	1115	1336	Cumulative Impacts	Cumulative Foreseeable I mpacts to Colorado River Management It is highly likely, if not proven that the total flow of the Colorado River is inadequate to meet the delivery of apportioned quantities of water to the Colorado River Compact states. In other words, certain volumes were guaranteed by the Compact that are realistically unavailable. There is significant scientific study that indicates that the total flow of the Colorado River is diminishing and that such a trend will continue. Consequently, the removal of Colorado River water via the LPP pipeline must be closely examined for the basis of its potential impact on: legal agreements ; maintenance of sufficient water in Lake Powell for hydropower production and other purposes ; delivery of required volumes of water downriver to Lake Mead and Lower Basin states ; and ever - inadequate river flow through the Grand Canyon and Grand Canyon National Park.

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					Legally mandated protection of Grand Canyon and its resources and values, and other downriver stretches must be evaluated.
Zach	Frankel	1116	1660	General	To save you time and energy we have attached a list of materials and correspondences we have submitted to the FERC docket on the Proposed Lake Powell Pipeline which are relevant to the Bureau of Reclamation's scoping and permitting for this project. These materials include as follows, listed in reverse sequence: 1. February 2019 Utah Rivers Council Letter to Legislative Auditor General regarding problems with Lake Powell Pipeline. This letter articulates the bogus claims of future water need for the Lake Powell Pipeline and the fact that project sponsors don't intend to actually take full delivery of project water until 2054, questioning the purpose and need for this proposed Pipeline. 2. August 2019, A Performance Audit of the Repayment Feasibility of the Lake Powell Pipeline. This Legislative Audit found that the construction costs for the Lake Powell Pipeline could be repaid with a roughly 357% increase in water rates, which also required that no recession would occur within the next decade. The Auditors refused to address if these water rate increases would impact water demand because they claim they were prevented from determining whether Lake Powell Pipeline water was needed. Auditors claim they were told asking whether the Pipeline was necessary was deemed "too political" and subsequently refused to consider how these rate increases would lower water use, thereby eliminating the need for the Lake Powell Pipeline in the first place. 3. February 2019 Utah Rivers Council Letter letter to Army Corps of Engineers regarding the proposed 404 Wetland Alteration Permit for the Lake Powell Pipeline. 4. November 19, 2018 Utah Rivers Council letter to FERC questioning the purpose for the Lake Powell Pipeline based on water supply /water demand needs. 5. November 16, 2018 Utah Rivers Council Motion to Intervene to FERC This 162 page correspondence establishes the standing of the Utah Rivers Council by outlining our extensive history studying and documenting problems with the proposed Lake Powell Pipeline which date back to 2006. We have advocated for the
Zach	Frankel	1116	1661	General	ratepayers and taxpayers of Washington and Kane County for over 10 years and on behalf of Utah and U.S. taxpayers for a longer period. This filing includes the 2015

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					<p>Legislative Audit of the Utah Division of Water Resources, the project sponsor of the proposed Lake Powell Pipeline. This Audit was shepherded by the Utah Rivers Council beginning in 2013 when our organization learned that this state agency was inventing data, manufacturing claims of water shortage, didn't possess viable data sets to prove the agency's claims that Lake Powell Pipeline water was necessary for future Utah residents. This extensive Legislative Audit supported these claims and noted, as Chapter 4 is titled, that the Growth in Future Water Supply Should Be Reported to Policy Makers. Although the Division of Water Resources noted their full agreement with all the findings of this 2015 Legislative Audit, they have subsequently ignored the Audit's findings and pretended as if the vast tracts of irrigated farmland aren't being replaced by urban development, including inside Washington County. This appalling lack of compliance with the 2015 Legislative Audit questions the legitimacy of the Division of Water Resources' claims that Lake Powell Pipeline water is needed in the future to service municipal growth. 6. August 3 2018 Utah Rivers Council letter to Bureau of Land Management regarding the Arizona Strip BLM Resource Management Plan Amendments. This letter notes the improper segmentation of NEPA for the proposed Lake Powell Pipeline which fails to adequately address purpose and need for the project and viable alternatives to the exorbitant Pipeline. 7. June 22, 2018 Utah Rivers Council letter to FERC noting the additional segmentation of NEPA through the Utah Division of Water Resources Sand Hollow Regional Pipeline project, a subcomponent of the proposed Lake Powell Pipeline which failed to address purpose and need and viable alternatives. 8. February 12, 2018 Utah Rivers Council letter to FERC summarizing a correspondence between General Manager of the Washington County Water Conservancy District and the Utah Division of Water Resources. This correspondence summarizes troubling statements between these two Lake Powell Pipeline project leaders which openly acknowledge their failure to finance the proposed Pipeline. The 'ability to pay' for a capital works project, particularly a water project to be paid in part by future water rate increases, is a well-known economic test to determine whether a proposed project is actually needed. The two project leaders openly acknowledge they cannot finance the project through the local economy of the water users receiving water from the Pipeline. These</p>

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					roughly 160,000 people in Washington County simply cannot repay the project costs of the Pipeline, unless they are given interest free loans which last for
Zach	Frankel	1116	1662	General	<p>ratepayers and taxpayers of Washington and Kane County for over 10 years and on behalf of Utah and U.S. taxpayers for a longer period. This filing includes the 2015 Legislative Audit of the Utah Division of Water Resources, the project sponsor of the proposed Lake Powell Pipeline. This Audit was shepherded by the Utah Rivers Council beginning in 2013 when our organization learned that this state agency was inventing data, manufacturing claims of water shortage, didn't possess viable data sets to prove the agency's claims that Lake Powell Pipeline water was necessary for future Utah residents. This extensive Legislative Audit supported these claims and noted, as Chapter 4 is titled, that the Growth in Future Water Supply Should Be Reported to Policy Makers. Although the Division of Water Resources noted their full agreement with all the findings of this 2015 Legislative Audit, they have subsequently ignored the Audit's findings and pretended as if the vast tracts of irrigated farmland aren't being replaced by urban development, including inside Washington County. This appalling lack of compliance with the 2015 Legislative Audit questions the legitimacy of the Division of Water Resources' claims that Lake Powell Pipeline water is needed in the future to service municipal growth.</p> <p>6. August 3 2018 Utah Rivers Council letter to Bureau of Land Management regarding the Arizona Strip BLM Resource Management Plan Amendments. This letter notes the improper segmentation of NEPA for the proposed Lake Powell Pipeline which fails to adequately address purpose and need for the project and viable alternatives to the exorbitant Pipeline.</p> <p>7. June 22, 2018 Utah Rivers Council letter to FERC noting the additional segmentation of NEPA through the Utah Division of Water Resources Sand Hollow Regional Pipeline project, a subcomponent of the proposed Lake Powell Pipeline which failed to address purpose and need and viable alternatives.</p> <p>8. February 12, 2018 Utah Rivers Council letter to FERC summarizing a correspondence between General Manager of the Washington County Water Conservancy District and the Utah Division of Water Resources. This correspondence summarizes troubling statements between these two Lake Powell Pipeline project leaders which only acknowledge their failure to finance the proposed Pipeline. The 'ability to pay' for a capital works project,</p>

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					particularly a water project to be paid in part by future water rate increases, is a well-known economic test to determine whether a proposed project is actually needed. The two project leaders only acknowledge they cannot finance the project through the local economy of the water users receiving water from the Pipeline. These roughly 160,000 people in Washington County simply cannot repay the project costs of the Pipeline, unless they are given interest free loans which last for
Zach	Frankel	1116	1663	General	This action questions whether other claims made by the Washington County Water Conservancy District can be relied upon as accurate, including its claims of available water supply and future water needs. 13. A September 2016 Letter from Utah Economists to the Utah Governor. This letter summarizes the failed repayment model put forth by the Washington County Water Conservancy District to repay the Lake Powell Pipeline. The failure of this water supplier to understand, or at least be honest in acknowledging, basic water supply and water demand economics is an obvious alarm to state and federal taxpayers. The failure of this agency to create a viable repayment model in the face of its advocacy for water its constituents do not need and cannot afford is a clear demonstration of pork barrel spending. The Bureau echoed these mistakes in its scoping presentation of January 2020. Purpose and Need and 'ability to repay' are related concepts that are essential to this permitting process and in serving both Utah and U. S. taxpayers. 14. October 7, 2013 Economist letter to the Utah Governor. This letter summarizes problems with the Kane County Water Conservancy District's participation in the proposed Lake Powell Pipeline. The letter from 19 economists summarizes chronic problems with the repayment plan proposed by this water agency. Repayment of the Lake Powell Pipeline by the se Kane County residents is contingent upon raising water rates in Kane County by at least 538%, raising impact fees 344% and raising property taxes 61 %. Repayment is also contingent upon having a proposed nuclear power plant licensed and constructed, which would be an incredible feat since this proposal hasn 't advanced in nearly 7 years and is unlikely to do so. This nuclear power plant was a component of the Pipeline repayment plan, according to the Kane County Water Conservancy District.

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Lynn	Carroll	1117	1321	Alternatives	I recommend using Western Resource Advocates' "Local Waters Alternative," as I'm aware of the organization's record of careful analysis of practical alternatives. Any alternative should include conservation (demand reduction) measures. Analysis should include costs and yields of various conservation methods.
Lynn	Carroll	1117	1322	Climate Change and GHGs	The EIS should use a range of temperature and precipitation predictions from recent climate research in trying to analyze such questions as how water levels in Lake Powell might vary, how fast water will be lost from soils in relatively wet and dry years, and how demand will respond to water rates. Will demand for water increase as the temperature rises? Will any increase apply to culinary water or only irrigation? Will the tourist population decrease in warmer months, reducing demand? The uncertainty in what the future climate will be adds to the difficulty in predicting whether the LPP would be successful in fulfilling its purpose
Lynn	Carroll	1117	1323	General	At what water elevation in Lake Powell would the pipeline have to stop withdrawing water? Would this be when the lake level drops below power pool elevation? Utah taxpayers have been told that the water users will pay the state back for the costs of building and maintaining the pipeline, but we don't trust the numbers that have been used in the past. The EIS should not use old numbers in FERC studies, but rather include the findings and recommendations from the current Reclamation studies on climate change, the Utah state audit on water projections, and the recent Division of Water Sources reports. The risk to taxpayers that the LPP won't generate enough income to pay for itself (and interest on the loan) should be estimated. How will the risk change, depending on the system used for raising the repayment money?
Lynn	Carroll	1117	1324	General	Please evaluate the cost of pumping water uphill such a great distance under conditions of low and high water availability. Also can this be accomplished without burning fossil fuels? If not, how much CO ₂ - equivalent will be released under low and high use? Of course more typical environmental costs should be analyzed, such as disturbance of previously intact soils, disturbance of sensitive species found in the pipeline's route due to noise, construction vehicles, etc., and contamination of streams that are crossed by the pipeline with silt, fuel, or quagga mussels, to name a few. I would hope that the cumulative effect of withdrawing additional water from

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					the Colorado River system on species that use the river would also be analyzed. This is does not list all the issues that need to be analyzed in the LPP EIS, just those I am able to put into words in a few hours.
Bob	L	1118	1320	Alternatives	Therefore, water reuse needs to be seriously researched as a viable alternative to the Lake Powell Pipeline. It would mean maintaining control of the entire system within the county, rather than spread across southern Utah and parts of northern Arizona. It would mean jobs for county residents. It would mean having a constant, reliable source of water to support the county's growth. And it would draw attention to the county and its cities as leaders in smart, innovative, efficient, environmentally sound practices
Leslie	James	1119	1308	General	Please add CREDA to the LPP mailing (electronic) list.
Leslie	James	1119	1312	General	Project Description/Transmission: Please ensure that any required transmission resources are identified, including cost, ownership and o & m responsibility, and system impacts (if there are interconnections to existing facilities).
Leslie	James	1119	1314	General	Project Description/Power: The scoping presentation in St. George noted that power generation “is out, for the most part”, compared to the original project design. Please include specific information about any anticipated or proposed hydropower generation included in the LPP.
Leslie	James	1119	1315	General	Impacts Assessment: Please include CRSP hydropower as one of the resources included in the NE P A impacts assessment. Refer also to CREDA’s 11/2/18 comments to Mr. Jared Baxter on the Green River Block Water Exchange Contract Draft Environmental Assessment.
Leslie	James	1119	1316	T&E Species	CREDA is a member of the Upper Colorado River Endangered Fish Recovery Program committees, and therefore has an interest in how natural flows may be allowed to “contribute to meeting the Endangered Species Act Upper Colorado River Recovery Implementation Program requirements in the Green River.” Please expand on this scoping information in the NEPA documentation.

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Joel	Ban	1120	1303	Alternatives	We strongly urge the agency to study and carefully examine all alternatives for this proposed project but particularly the no action alternative should be carefully considered. This alternative is by far the preferred alternative when it comes to serving the public interest and providing a reliable source of water for future generations.
Joel	Ban	1120	1305	Water Supply	Additionally how this project will affect future water levels in the Colorado River must be carefully considered particularly as it relates to global climate effects and the reduction in water levels across the whole water basin, but particularly due to reduced snow pack sources of water that feed into the basin.
Joel	Ban	1120	1306	Wildlife	Please study effects to wildlife, both endangered and non endangered, and also the impacts to social justice in terms of how this project will benefit a few individuals as opposed to all water users across the Colorado River basin. I
Lain	Leoniak	1121	1293	Water Law	Legal Framework: The LPPP is a complex undertaking that raises a number of legal issues, involving the Colorado River Compact of 1922 and other elements of the Law of the River. ² While Colorado supports the LPPP, questions remain as to whether, under
Lain	Leoniak	1121	1294	Water Law	the Law of the River, Utah may use a part of its Upper Basin apportionment to serve uses in the Lower Basin portion of Utah without obtaining the consent of the other states. Utah has discussed some of these issues through informal communications or consultations among the Basin States. However, before the NEPA permitting process is completed, formal documentation of how Utah will implement the LPPP consistent with the Law of the River will be essential.
Lain	Leoniak	1121	1295	Water Supply	Lake Powell as Water Source: The Federal Register Notice ("FRN") published on December 6, 2019, provides that Utah has requested a water exchange contract with the Bureau of Reclamation ("BOR"), and that pursuant to that exchange contract, Utah "would forbear the diversion of a portion of the natural flows to which [Utah] is entitled and allow these flows to contribute to meeting the Endangered Species Act Upper Colorado River Recovery Implementation Program requirements in the Green River." ³ It further provides that "[i]n exchange, [Utah] would deplete an equal

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					amount of water released from Flaming Gorge Dam throughout the year and available at Lake Powell. This exchange contract would not entitle [Utah] to call for releases from Flaming Gorge." Because any use of Lake Powell supply or capacity directly implicates rights within the Upper Division, it is important that the EIS make clear the source of water and water right for the LPPP. Additionally, Colorado requests that the LPPP clarify how use of said water will be integrated into the Law of the River to avoid injuring the interests of the other Upper Division states.
Lain	Leoniak	1121	1297	Water Law	Virgin River: The FRN provides that the LPPP would deliver up to 86,249 acre-feet of water from Lake Powell to Sand Hollow Reservoir to provide additional water supplies for use in Washington and Kane counties in Utah. Sand Hollow Reservoir is an offchannel reservoir that stores water diverted from the Virgin River. In addition to this description, the EIS should clarify the connection, if any, of the LPPP to flows in the Virgin River drainage, a Lower Basin tributary that flows to Lake Mead. To that end, the EIS should also recognize and assess how such connection, if any, is to be accounted for in a manner consistent with the Law of the River.
Lain	Leoniak	1121	1300	General	Colorado River Descriptions: The CWCB recommends that EIS descriptions of the Colorado River and its operations remain accurate and consistent. As examples, definition of Upper and Lower Basins, description of releases from Glen Canyon Dam (timing of Secretary determinations, summary of operational tiers), discussion of the Article III(d) non-depletion obligation, identification of the Secretary of the Interior's role as water master, water apportioned under the Upper Basin compact, etc. should be carefully included as needed with an understanding of how those and other elements of Colorado River operations apply throughout the Basin. Additionally, the CWCB recommends that any descriptions of available yield in the Upper Colorado River Basin, if included in the EIS, reflect the position of all Upper Basin states and how they operate. Otherwise, the CWCB recommends that these descriptions identify and describe Utah's perspective and not speak on behalf of the other basin states.
Lain	Leoniak	1121	1301	Water Law	Reservation of Rights: The CWCB's comments are intended to highlight overarching issues that will require acknowledgement, specification or clarification as the LPPP

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					EIS process continues to progress. The CWCB's failure to provide specific comments regarding details of the LPPP shall not be construed as an admission with respect to any factual or legal issue or the waiver or rights for the purposes of any future legal administrative or other proceeding. Furthermore, the CWCB reserves the right to comment further on LPPP documentation as BOR proceeds with subsequent phases of the EIS process.
John	Weisheit	1122	1290	General	Thank you for your presentation at the Kanab Scoping Meeting of January 7th, 2020 for the Lake Powell Pipeline Environmental Impact Statement. I enjoyed my short visit with you, Kelly (the court reporter), and your staff. It was also great to catch up with some old friends. As you will recall, I did not come to this meeting empty-handed. I presented a package to Kelly, the court reporter, who gladly accepted the package and explained to me that they would be attached to my testimony about the EIS. I mentioned this to you as we conversed and you said that Kelly indeed would handle the DVDs according to my wishes. Thank you! The package I left with you and Kelly included: (1) five DVDs (plus five duplicate DVDs); (2) an inventory list of the digital media contained within the DVDs, and; (3) a cover letter explaining the purpose of my submission, which is to fill the official administrative record for the Lake Powell Pipeline Environmental Impact Statement that you and your staff are now preparing. As I explained to you at the meeting, I have a server that stores all the documents that I have personally collected for many decades. Incidentally, my entire collection is publicly available at my "blog," which is called "On The Colorado." http://www.onthecolorado.org There are a half dozen features on this website about the Lake Powell Pipeline. The DVDs I presented to you contain digital media that are specifically relevant to the Lake Powell Pipeline.
John	Weisheit	1122	1291	General	My cover letter (pdf) is attached below, as is the inventory list (pdf) of the five DVDs. I did compress (zip) the DVDs and uploaded them to my server. For your convenience, you may download the zip files by double-clicking the following hyperlinks: http://www.riversimulator.org/Resources/LPPadmin/DVD01.zip http://www.riversimulator.org/Resources/LPPadmin/DVD02.zip http://www.riversimulator.org/Resources/LPPadmin/DVD03.zip

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					http://www.riversimulator.org/Resources/LPPadmin/DVD04.zip http://www.riversimulator.org/Resources/LPPadmin/DVD05.zip
John	Weisheit	1122	1292	General	<p>My name is John Weisheit and I am an official representative of Living Rivers and Colorado Riverkeeper, which is a non-profit organization based in Moab, Utah along the Colorado River. I am a participant of the Lake Powell Pipeline public scoping meeting here in Kanab, Utah for the evening of January 7, 2020. Our organization will be submitting our scoping comments and supporting documents on January 10th via email. By the project name, Lake Powell Pipeline, the first studies for this Colorado River diversion emerged in the 1990s, some 25 -years ago. If you consider the purposes of the proposed Dixie Project, from the early 1960s, the project history actually began 60-years ago. Consequently, the paperwork associated with the administrative history of this project is quite voluminous. To fully disclose the findings of all this information to the public is probably a task for a historian to complete at a later time, but for now I would like to submit the information that I personally collected for about 30-years. This material is archived on a website that I maintain. That website is called "On The Colorado" and the url is http://www.onthecolorado.org. I call my collection an "administrative record" and I want to be clear that this collection is not the official administrative record of the federal government, but I do indeed want this information to be included in the official administrative record for the Lake Powell Pipeline Environmental Impact Statement. Therefore, I am presenting five DVDs of digital media from this public record of mine. The information includes, for example, comments from the public, features from the press corps, professional papers from academia, and the various agency studies from municipal, county, state and federal government. Additionally, in each envelope, you will find a printed inventory of the documents contained within each DVD. I took the time to verify the quality of the DVDs and</p>
Paul	Burnett	1123	1283	Purpose and Need	The EIS must clearly identify and analyze the need for the proposed project.

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Paul	Burnett	1123	1285	Other	The public cost of this proposed development is staggering and deeply concerning. The EIS should consider the following aspects that relate to the costs of this project. o Develop an economic analysis of the costs of the pipeline versus the costs and benefits of water conservation and water savings by incentivizing native landscapes as an alternative to fueling further water use. o Develop a serious analysis of the energy costs associated with delivering water through the Lake Powell Pipeline, focusing on the source of energy and greenhouse gas emissions that will result from water delivery
Paul	Burnett	1123	1286	Special Status Species	The ecological impacts of moving large volumes of water out of Lake Powell and the Colorado River mainstem should be studied and analyzed. The analysis should show
Paul	Burnett	1123	1287	Special Status Species	how movement of water out of Lake Powell will impact instream habitat upstream and downstream of Lake Powell.
Paul	Burnett	1123	1288	Water Supply	The EIS should include a hydrologic analysis that considers the long - term water supply and demand trends within the Colorado River basin. Long -term trends clearly show that there remains a structural imbalance between water supply and demand in the Colorado River System, meaning water demand currently exceeds water supply when viewed over the lifetime of Lake Powell. The EIS should demonstrate: o The consequences of further demand caused by the pipeline, o An analysis of the impacts of water demand changes to the Colorado River Compact and the Law of the River, o Impacts of climate change and concomitant changes to the overall water supply and demand. The EIS should ensure that water is available to support this pipeline. Literature suggests that under climate change scenarios, growing seasons are lengthening, and consumptive demand is increasing relative to temperature. Basing any estimates of water supply sufficiency on historical climatic data may lead to a biased analysis
Paul	Burnett	1123	1289	Alternatives	The EIS must identify and analyze a broad set of alternatives to the proposed action, including water conservation, water reuse, and demand management activities in the area of southern Utah that would be served by the Lake Powell Pipeline.

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Bart	Miller	1125	1556	General	We hereby incorporate by reference extensive prior comments we have submitted on the LPP proposal, which should be available in FERC’s eLibrary Docket Number P - 12966.
Bart	Miller	1125	1557	General	To meet the requirements of the National Environmental Policy Act, the Administrative Procedures Act, and other relevant federal law, the DEIS must, among other things, closely analyze :1. LPP beneficiaries’ proposed “need ” — substantiated with clear and robust analysis of current water use and demand projections —for Lake Powell Pipeline water ;2. Alternatives to the proposed LPP, including a robust No Action alternative ;3. Physical and legal constraints to water availability, including Arizona’s Export Statute;4. Increased risk to Colorado River Basin water rights;5. Pipeline alignment impacts to federal and tribal lands.
Bart	Miller	1125	1564	General	Because of the size of the proposed project and, if built, its perpetual nature, the DEIS for the LPP must compare the increased risk of shortage and curtailment of upper Colorado River Basin water rights from the proposed LPP to the No Action Alternative. 7 Reclamation must take a “hard look” at the reasonably foreseeable impacts on the Basin from the LPP. 8 Reclamation is also required to identify possible conflicts between the proposed LPP and the objectives of federal and state policies.
Bart	Miller	1125	1567	Mitigation	The proposed project involves a contract with the Bureau of Reclamation.10 As a result, the provisions of the federal Reclamation Reform Act (RRA) also apply . 11 Under the RRA, the Bureau has a duty to
Bart	Miller	1125	1568	Mitigation	promote “full consideration and incorporation of prudent and responsible water conservation measures” in the water projects of non -Federal water entities that receive water from Federal reclamation projects.12 Project beneficiaries must develop conservation plans containing definite objectives, proposed conservation measures and a proposed time schedule for compliance,13 and must submit their conservation plans to the Bureau.14 The RRA requires that water recipients certify their compliance with the Act.15

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Bart	Miller	1125	1574	Purpose and Need	The Purpose and Need for this project must be substantiated by high quality and detailed water use data, along with a robust analysis of future water demands, using best practices in data collection, forecasting, and inter -governmental cooperation between Washington County Water Conservancy District (WCWCD) and local water retailers.
Bart	Miller	1125	1575	Water Resources	The applicants for the LPP need to clearly address the following questions:1. Is all culinary water metered throughout the county? If not, what steps need to be taken to get to that point and what is the timeline and cost? What kinds of meter reading systems are used to collect data? Do these systems represent best practices in modern water management (which includes automatic meter reading and advanced metering infrastructure)?2. Has an assessment of water loss been conducted in each retail provider’s system in the county as well as in the WCWCD’s system? Are they using best practices to measure and manage water loss (such as the American Water Works Association’s M36 manual)? How much water is being lost and what are the options to reduce those losses?3. How much secondary water is used and how much of it is metered? What is the timeline for metering all secondary water?4. What impact would robust implementation of these foundational water management best practices (metering, water loss management, water rates) have on supplies and demand management, and the need and purpose of the Lake Powell Pipeline ?
Bart	Miller	1125	1577	Water Supply	Future Demand Projections Must be Detailed and Robust in order to Substantiate the Claimed Need for LPP Water
Bart	Miller	1125	1578	Water Supply	Moreover, the project applicants’ future water demand projections include just a single water use future rather than examining a range of possible futures. Variables like population growth and per capita water demands are extremely useful to include in this kind of analysis, which would give a basic range of future demands. Specifically we recommend modeling per -capita demand reductions at a rate of 1% per year, a pace of urban conservation common in communities throughout the western United States.Inclusion of these details and robust analysis of current water use and future water use projections provide something against which the claimed need for the project properly could be evaluated. Much of the missing information and analyses is

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					basic and any water provider should have it, and especially if that water provider is claiming the need for 86,000 AFY from the Colorado River.
Bart	Miller	1125	1579	Purpose and Need	In the DEIS, the Purpose and Need and alternatives analysis, including the No Action Alternative, must include water demand projections that provide a detailed analysis of:1. How will the minimum standards for per -capita water use by project beneficiaries be achieved? [Analyses should identify specific programs and policies, the targeted sectors (residential, industrial, commercial and institutional), and identify the timeframe for implementation. Foundational demand management policies like conservation -oriented tiered rate structures and landscaping ordinances must be evaluated for their impact on water demands across all local jurisdictions and water retailers.]2. How might the project beneficiaries achieve a 1% per year reduction in per capita water demands? What are the lowest cost options for achieving that, and how do those costs compare with the Lake Powell Pipeline costs?3. What impacts will variables like shifts in the population demographics (e.g. residential and non -residential water demands) and variable population growth have on future water demands?
Bart	Miller	1125	1584	Alternatives	The No Action Alternative needs to provide realistic and robust alternatives to LPP project, per the requirements of the RRA and including the direction from the Army Corps of Engineers.The requirements of the federal Reclamation Reform Act (RRA) require the Bureau to promote “full consideration and incorporation of prudent and responsible water conservation measures . ” Project beneficiaries must develop conservation plans containing definite objectives, proposed conservation measures and a proposed time schedule for compliance,18 and must submit their conservation plans to the Bureau.19The project applicants must develop a detailed and robust alternative to the Lake Powell Pipeline, which would necessarily include a detailed and robust water conservation plan under the RRA. The project applicants have failed to do so to date, in spite of being presented with a model alternative originally developed by Western Resource Advocates in 2013, and in accordance with the direction from the Army Corps of Engineers, in letter dated June 19, 2019 , 20 to the Utah Division of Water Resources, which stated (emphasis added) :Review of the

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					information you have submitted to date indicates that several items are still needed to complete processing of your individual permit application. The information we need to receive in order to complete processing of your application for an individual permit is below . . .5. Provide alternatives information sufficient to show compliance with EPA's Section 404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR 230). The 404(b)(1) Guidelines state that no discharge of dredged and/or fill material shall be permitted if there is a practicable alternative which would have less adverse impacts on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purpose. Practicable alternatives include, but are not limited to: 1) activities which do not involve a discharge of dredged or fill material into waters of the U.S. and 2) discharges of dredged or fill material at other locations in waters of the U.S. If it is an otherwise practicable alternative, an area not presently owned by the applicant which could reasonably be obtained, utilized, expanded or managed in order to fulfill the basic purpose of the proposed activity may be considered.
Bart	Miller	1125	1586	Alternatives	In 2013, WRA developed the “Local Waters Alternative ” 21 , a robust and detailed analysis of common - sense options that can be pursued in lieu of the Lake Powell Pipeline. This alternative focuses on increased water conservation, increased water reuse and estimated realistic levels of water transfers from agriculture to urban areas in coming years.WRA has repeatedly updated the supply and demand projections based on new population projections and other information provided the state of Utah. Our latest update to the water supply and demand projections from this report was provided in a letter to the Army Corps of Engineers in 2019.22The Local Waters Alternative ’ s three water strategies for meeting the needs of the Washington County community through 2060 are: water demand management (i.e. conservation), water reuse, and the conversion of agricultural water to urban water uses which will happen as population growth continues.Specifically, the Local Water Alternative explains in detail how:- Water demands can be decreased at a rate of 1% per year —a documented, typical rate of reduction for many western communities — resulting in

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					193 GPCD (gallons per capita per day) in 2060.23 We recommend a few foundational water conservation programs be implemented, specifically conservation -oriented water rates (not the very low stepped “tiered” rates that are currently in place), landscape and new development policies, and metering and measurement of all water use to allow for good decision making in conservation program selection.- An increased volume of reuse water can help meet the needs for outdoor landscape irrigation, and potentially for commercial/industrial purposes.- An increased volume of agricultural water will become available for municipal water uses, as a natural function of continued urban population growth.- The costs of this Alternative are substantially lower than the cost of the Lake Powell Pipeline. As estimated in our 2013 analysis, the alternative are about 1/3 the cost of the Lake Powell Pipeline, plus some undetermined infrastructure costs associated with converting agricultural water supplies. When these factors are combined, water demands are met —if not exceeded— in 2060. This analysis shows in detail how the potential need for the Lake Powell Pipeline will not arise for several decades, and it is pre -mature to be investigating the LPP option when better water data management and robust implementation of these alternatives have not been sufficiently explored by the project applicant. Figure 1, below , illustrates the synthesis of the Local Waters Alternative, with water demand represented by the yellow line and the variety of water supplies represented by the colored blocks and wedges. The original 2013 Local Waters Alternative is found in Attachment B.
Bart	Miller	1125	1587	Alternatives	Pursuant to directive of the Army Corps of Engineers, the Bureau should require an assessment of a robust and reasonable alternative “maximizing” the use of components of the Local Waters Alternative. This includes not only a detailed analysis of future demand projections based on good data and a range of possible water demand futures, but an analysis of how local water supplies (including reuse and agricultural water transfers) can supply future needs for the coming decades.
Bart	Miller	1125	1593	Climate Change and GHGs	The DEIS must Consider the Impacts of Climate Change on Water Availability and Risk of Shortage in the Colorado River Basin The growing scientific literature on climate change impacts to water availability in the Colorado River Basin continually improves the understanding that heat -trapping greenhouse gas emissions are causing

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Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
Bart	Miller	1125	1594	Climate Change and GHGs	increased temperatures throughout the Basin. ²⁴ Some studies have found evidence that this warming already has negatively impacted streamflow. ²⁵ Temperatures are projected to increase an additional 5 -6 degrees F throughout the 21st Century ²⁶ , and the majority of evidence suggests additional impacts on future demands, streamflow runoff, and overall water availability, especially in the Upper Colorado River Basin. ²⁷ Importantly, the influence of additional temperature increases on water availability may outweigh projected changes in overall precipitation, which are varied and uncertain. ²⁸ Such temperature -driven declines may reduce Colorado River streamflow upwards of 20% by mid -century and potentially 35% by end -of -century. ²⁹ Reclamation has specifically noted that growing demands in the Colorado River system, in conjunction with these impacts from climate change, may increase the risk of shortages in the coming decades. ³⁰ The proposed LPP would only exacerbate shortage risks to users throughout the system.
Bart	Miller	1125	1595	Water Law	The DEIS Also Must Address Limitations and Potential Conditions Imposed by Arizona’s Water Export Statute, A.R.S. § 45 -292.The Arizona Water Export Statute expressly prohibits transporting water from Arizona for consumptive use in another state without approval by the Director of the Arizona Department of Water Resources. ³¹ In the proposed LPP, the Utah Division of Water Resources plans to pump stored water from Lake Powell at a point in Arizona and transport that water via pipeline for consumptive use in Utah. Therefore, the plain terms of the Arizona Water Export Statute apply to the current plans for the Lake Powell Pipeline. Under A.R.S. § 45 -292, the Director must hold a formal administrative hearing on the application and consider statutory factors in determining whether to grant, condition, or deny the application to move water out of Arizona. ³²
Bart	Miller	1125	1596	Water Resources	The appropriate scope for the Lake Powell Pipeline (LPP) DEIS must include the range of impacts from the proposed federal action of building the LPP from Lake Powell to Sand Hollow Reservoir, delivering up to 86,249 acre -feet of water annually. ³⁴ “Impacts” and “effects” are synonymous. ³⁵ Part of the scoping of any EIS is identification of the “affected environment” and the “potentially affected geographical area. ³⁶ The direct, indirect, and cumulative impacts of the proposed

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
					action must be considered. ³⁷ Indirect impacts include effects on water and other natural systems, and also economic, social, and cultural impacts. ³⁸
Bart	Miller	1125	1599	Water Law	It is important to emphasize that the LPP’s new demand on the Colorado River system increases the risk of curtailment under the Colorado River to all other upper Colorado River water rights, not just to the LPP itself. While there may be disagreement regarding the amount of incremental increase in the risk of curtailment to existing water rights, there are no known studies or reports contradicting the conclusion that new uses such as the LPP cause increased risk. The DEIS for the LPP must compare the increased risk of shortage and curtailment of upper Colorado River Basin water rights from the proposed LPP to the No Action Alternative. ⁴⁷ Reclamation must take a “hard look” at the reasonably foreseeable impacts on the Basin from the LPP. ⁴⁸ These impacts will include the increased risk to other water rights, which could have significant detrimental economic and social impacts throughout the Basin, as compared to the future without the LPP (no action). The curtailment risks imposed by other action alternatives should also be compared to the No Action Alternative and the LPP proposal. ⁴⁹
Bart	Miller	1125	1603	Water Supply	Reclamation is also required to identify possible conflicts between the proposed LPP and the objectives of federal and state policies. ⁵⁰ The Department of the Interior’s commitment to ensure reliable Colorado River water now and for future generations through water conservation and reduced water use ⁵¹ presents a direct conflict with the additional use and depletion proposed by the LPP. This conflict must be considered and discussed in the Environmental Impact Statement.
Bart	Miller	1125	1605	Cultural Resources	The DEIS must assess impacts that various pipeline alignments would have on federal and tribal lands, including artifacts, historical sites, and areas subject to any special designation. Notable among these, as WRA noted in recent comments to FERC, LPP project construction proposes facilities near and possibly within the boundaries of Grand Staircase National Monument, boundaries currently under litigation in federal court. ⁵² The Bureau of Reclamation should assess whether it is prudent to move forward with any analysis of the LPP proposal until after the

Appendix C- Scoping Comment Matrix
Scoping Comments

First Name	Last Name	Comment Number*	Segment ID*	Issue Name	Comment Text
					resolution of this litigation, as there is a high likelihood the outcome of that litigation will impact the Bureau's permitting analysis.

Appendix D

Example Form Letters

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Form Letter #1

From: [REDACTED]
Sent: 1/6/2020 9:10:00 PM
To: lpp@usbr.gov
Cc:
Bcc:
Subject: [EXTERNAL] Cancel the Lake Powell Pipeline Project

Dear Mr. Rick Baxter:
(Program Manager, Bureau of Reclamation, Provo Area Office)

Please accept these comments in response to the Bureau of Reclamation's Notice of Intent to prepare a draft environmental impact statement and public scoping period for the Lake Powell Pipeline Project

I am writing to urge you to cancel the Lake Powell Pipeline Project. There is simply not enough water available in the Colorado River Basin to support an additional 28 billion gallons of withdrawal in Utah. Committing that water to sprawl and development in Utah further drains and destroys the Colorado River and negatively impacts its ecological health.

Other states are already having to cut use of the river owing to climate-driven flow declines. Those declines – and their associated water shortages – are forecast to worsen in the future with regional drying and climate disruption. Prudent policy today affords flexibility in future water management. In this case, that means keeping those 28 billion gallons available for downstream ecosystems and endangered species, including in the Grand Canyon.

The EIS should evaluate all plan alternatives against worst-case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems—including national wildlife refuges and critical habitats—and endangered species. The analysis should be based on the best available science and climate models.

Further, if Utah wants to be obsessed with fueling population growth, it will have to prioritize water conservation, not river destruction. I will oppose this project through the entire permitting process and I will support groups, like Save The Colorado, that will fight in court.

Thank you for your consideration.

[REDACTED]

[REDACTED]

Form Letter #2

From: [REDACTED]
Sent: 1/17/2020 10:33:03 PM
To: lpp@usbr.gov
Cc:
Bcc:
Subject: [EXTERNAL] Lake Powell Pipeline Scoping Comment

This comment is sent from



I have been a resident of Southern Utah for the past 49 years. We have loved its harsh beauty and the opportunities for an active outdoor lifestyle while raising our family and now our grandchildren. We spent many hours hiking and exploring in Washington County, particularly in Red Cliffs Recreation Area, the Red Cliffs National Conservation Area and Snow Canyon State Park as well and Zion National Park and Cedar Breaks National Monument, and the wonderful BLM land which is open to camping for us. We have run the San Juan, the Green, and the Colorado Rivers – where we have to pack our drinking water in the boat. We have come to understand that, especially in the West, water is life. It is too scarce and too precious to use thoughtlessly. My daughter's family lives in St George and when I visit it grieves me to see water running down the sidewalk from a neighbor overwatering in the day time. I have seen folks clean their driveway with water from a hose. There are many lush green golf courses – all in a state with the lowest or near lowest rainfall in the nation. Yet St George's water consumption rate is the highest in the nation. It is incorrect to blame this on all our second homes, for Phoenix and Tucson have many second homes as well and their water consumption rate is a fraction of ours. Conservation must be the key to our surviving in our beloved desert, and for our posterity to survive after us.

As a member of Conserve Southwest Utah I have studied their comments and ask respectfully that you analyze all of the following in Lake Powell Pipeline Scoping EIS.

- **Include a “conservation” alternative to the EIS** that would reduce the demand for water through a number of conservation methods. Western Resource Advocates' [“Local Waters Alternative.”](#) is a comprehensive approach to provide a flexible and cost effective pathway for Washington County to meet its water needs through the year to 2060. Water conservation is the key component of this alternative, when combined with increased reuse for landscaping, agricultural water transfers among other measures. Also, include an analyze of treatment of our abundant ground water, and storm water capture. These measures would result in a more sustainable water supply for the future. This is a reasonable alternative that is practical and feasible from the technical and economic standpoint using common sense measures. It is a better solution than the LPP's water supply that is vulnerable to raising temperatures with less stream flows, political conflict, controversy and uncertainty.
- **Evaluate the costs and yields of major conservation** methods such as: tiered water use rates, weighting water revenue sources toward usage rates, building codes requiring water-wise landscaping, incentives to convert existing properties to water-wise landscaping, use of secondary water instead of culinary water for landscape irrigation (requiring this change in all new developments), etc.
- **Include updated information:** the recommendations in the state audit of the state's projections of water needs, the more recent lowered population projections, the recent Department Water Resource study of higher conservation potential, and consider all water supplies in Kane and Washington County.
- **Determine the high-probability of the long-term Colorado River flow for the LPP under a range of future climate conditions.** Also, include the data on at what Lake Powell reservoir water levels can Utah Board Water Resources(UBWR) continue to draw from the remaining water left in Lake Powell reservoir. Include in the analysis the risk of disruption to water for LPP due to the Lake Powell reservoir dropping below the power pool evaluation in Lake Powell. In addition, include an analysis of LPP's water right junior water right status including the possibility of disruption of diverting water to the Lake Powell Pipeline as water levels drop in Lake Powell reservoir and who has senior rights to the remaining water.
- **Determine how the specific LPP costs will be paid back to the state that also includes the tax burden on residents.** The Truth in Lending Act of 1968 is a United States federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the manner in which costs associated with borrowing are calculated and disclosed and should be considered in the disclosure to the public in this EIS.

- Reclamation should also consider analyzing in the EIS the following:
 - i. What portion of the payment would be allocated to the 3 revenue sources (property taxes, impact/connection fees, water use rates).
 - ii. The risk of water rates going up so high residents use less water and thereby the state can't pay the debt of the LPP .as planned.
 - iii. Interest rates and accumulated totals over the duration of the loan
 - iv. The impact of the payment methods on water use, and the impact of that on the water supply requirements
 - v. The risk of disruption that UBWR can't divert any water out of Lake Powell reservoir and therefore the state doesn't have water to sell to pay for the debt.
 - vi. The risk to state bonding levels being stretched by the LPP debt and then the state doesn't have bond funding for other important state needs.
- **Require UBWR to complete a study that confirms their claims regarding the LPP's water is highly secure** for the long-term.
- **Evaluate for sufficiency the concept and plan for providing water for the LPP if senior water rights** use all of Utah's recalculated Colorado River allocation that considers the high probability of long-term Colorado River declining flows.
- **Provide the clear and concise evidence on water rights that verifies that Reclamation has physical water to sell to UBWR in its water exchange contract for the LPP. In addition, provide the water rights data that verifies UBWR has unused water in the Green River tributaries to exchange with Reclamation for the LPP.** Also, include an analysis of what laws allow Reclamation to approve a water contract that moves water from the Colorado River's Upper Basin for use in the Lower Basin. This is not allowed in the Colorado River 1922 Compact.
- **It has been a decade or more since some of Federal Energy Regulatory Commission (FERC) studies were completed.** This affects their reliability and the credibility to be used in the EIS. If the FERC studies are to be used in this EIS, verify all previously submitted comments have been properly dispositioned and that the FERC Study reports have been updated appropriately
- **A study on costs over the long term of the risk of the possible infestation of quagga mussels into our regional pipeline from the LPP that is connected to many cities water infrastructure.** The health hazard of putting chemicals in the water at every pump station along the pipeline. The concern that filters do not work as there is a very early life stage of mussels that is microscopic and can pass through current filters. In addition, the risk of infesting the Virgin River.

Thank you for your consideration. Please analyze these issues carefully and completely.

██████████

Form Letter #3

From: [REDACTED]
Sent: Wednesday, January 8, 2020 5:48 PM
To: lpp@usbr.gov
Subject: [EXTERNAL] Lake Powell Pipeline Would Worsen Colorado River Crisis

To Whom it May Concern,

I'm writing to voice my concerns about the proposed Lake Powell Pipeline for which an EIS scoping process is underway.

The Lake Powell Pipeline is an unsustainable project that relies on a resource that is already pushed to the limit.

Washington and Kane counties are some of the largest per capita water users in the country. Economic studies show that the project would require huge increases on fees, water rates, and property taxes in the region.

The strategy for using water in the Southwest should be based around conservation and sustainability, not more consumption.

For these reasons, I believe the Lake Powell Pipeline project should not be allowed to move forward.

Thank you for taking the time to read my comments.