



Commenting Guidance

The Lake Powell Pipeline Draft Environmental Impact Statement

Your comments are crucial and will make a difference!

Conserve Southwest Utah has reviewed the Lake Powell Pipeline Draft Environmental Impact Statement and finds it to be inadequate and egregiously flawed. The Bureau of Reclamation (**BOR**) did not evaluate reasonable alternatives, did not adequately address public concerns raised in scoping, and did not include an objective analysis of the environmental and economic impacts the project will have on the residents of Washington County and the state of Utah. In the Lake Powell Pipeline (**LPP**) Draft Environmental Impact Statement (**DEIS**) critical data was misinterpreted and is hard to understand. Some information is completely omitted. The DEIS needs to be corrected and revised with accurate and unbiased information. Conserve Southwest Utah (**CSU**) outlines 9 points listed below which are topics of concern with the DEIS.

Comments due: September 8, 2020 by 11:59 pm MDT

Comments may be submitted by mail, email and/or fax to:

Bureau of Reclamation, Provo Area Office
302 East Lakeview Parkway
Provo, Utah 84606

RE: Lake Powell Pipeline DEIS

Email: lpp@usbr.gov

Fax: 801-379-1159

In a Separate Action please email a *copy* of your comment to the following address as we are tracking the number of comments submitted. Please do NOT cc CSU on your letter to the BOR.

stop.lpp@conserveswu.org This is optional. . . but appreciated!

Instructions on Writing Your Comment Letter in as Little as 15 minutes!

You will be moving back and forth between this website and an email you will create using these instructions.

- 1) Open your email program and start a new email.
- 2) On your email:
 - Paste this email address: lpp@usbr.gov into the “To:” line.
 - In the “Subject line” type: *Comment on the Lake Powell Pipeline DEIS*
 - Begin the body of the email with *Dear Bureau of Reclamation:*
- 3) Return to this Commenting Guidance webpage (i.e. the page where you found these instructions).
- 4) Review the menu of the nine commenting topics listed below. Select one by clicking on the blue topic number.
- 5) You can copy the entire Topic page or the specific bullet points on the page that are of interest to you.
- 6) Return to your email and paste what you copied into the body of your email.
- 7) Review all the information you have pasted into your email. Now *delete unneeded/unwanted language, edit, rearrange, and add personal comments to create a comment in your own language.* This is the step where you *make the letter more*

individualized which improves the effectiveness of the letter with the Bureau of Reclamation (BOR).

- 8) Don't feel like you have to add a second topic. Writing on one topic is acceptable and will make a difference.
- 9) Close with your name and hit *Send!*

Tips on Writing Your Comment Letter

- **Be aware that any information you share is public record** so you may choose not to include specific contact information like your physical address. All letters must be signed with your name and address: physical or email address, whatever you prefer to use.
- **Stating just your opposition** to the Lake Powell Pipeline **will not be considered as a valid comment** by the BOR. The objective is to point out how you are affected by the building of the LPP and the flaws in the draft Environmental Impact Statement (DEIS) that you notice.
- **If possible, tell a personal story** on whatever issue you are commenting on. For example: "My husband and I have xeriscaped our residence. We are using secondary water for our drought-tolerant trees. We have assisted and advised our neighbors who are moving in the same direction. Grass lawns are disappearing or reduced in size in our neighborhood and there is increased interest in native vegetation. We can reduce water needs by conserving."

List of Commenting Topics

- **Topic 1:** BOR introduced an arbitrary new "requirement" that Washington County must have a "second source" of water and made this a critical "purpose and need" for the LPP. Water conservation alternatives were summarily rejected based on this assertion.
- **Topic 2:** BOR arbitrarily dropped consideration of a viable, reasonable water conservation alternative.
- **Topic 3:** BOR artificially inflated Washington County's need for water.
- **Topic 4:** Under state law, all Utahns would be responsible for \$2 billion or more of public debt if the LPP is constructed.
- **Topic 5:** The LPP water right violates the 1922 Colorado River Compact.

- **Topic 6:** Utah has already allocated water rights to more than 100% of the physical water within its Colorado River watershed, meaning senior (older) rights will likely prevent use of the LPP water right during current and future droughts.
- **Topic 7:** The quagga mussel infestation in Lake Powell would threaten the LPP and our local reservoirs, municipal infrastructure, businesses, and homes, and reduce our water quality.
- **Topic 8:** The LPP will inflict tremendous environmental damage. Federal lands are owned by all Americans and the BOR should look beyond economics to protect public lands for future generations.
- **Topic 9:** BOR uses a questionable technique called “benefits transfer” to justify the entire cost of the LPP.

Guidance for Commenting on Each Topic

Topic 1: BOR introduced an arbitrary new “requirement” that Washington County needs a “second source” of water and then made this a critical purpose and need for the LPP, thus rejecting water conservation alternatives.

What the Draft EIS says or doesn’t say:

- BOR arbitrarily asserts that a “second source” of water, beyond an entire Virgin River watershed, is necessary for water security, and thus, conservation alternatives are rejected out of hand.
- BOR justifies the need for a second source based on forecasts of reduced flows in the Virgin River, ignoring similar reductions to the Colorado River. Indeed, Colorado River water users already face shortages.
- BOR analyzes impacts of LPP on Lake Powell, but never analyzes the reverse, whether Lake Powell can reliably provide water for the LPP. In many years the project will almost certainly be limited to low or no yield at all.

Why this is a problem:

- BOR provides no explanation or justification for how large a watershed should be to qualify as “reliable,” or when a community needs a “second source”; in fact, we’d still have just a “single source” of water—the Colorado River watershed.
- The “second source” of water for the LPP is the already over-allocated Colorado River, where flows are declining and expected to further decline due to climate change.

- The cost for a “second source” seems an unreasonable burden to place on the county—and our state—and not necessary if we would just lower our demand and use local supplies.
- BOR believes Washington County’s water supplies are not secure, even though we have dozens of wells, surface diversions, water retailers, and surface and underground reservoirs within the 2,800 square miles of the Virgin River watershed.
- The LPP will not meet the stated purpose and need, and the reliability is not addressed. The water supply analysis overestimates the reliability of the project being able to provide water for the pipeline.
- Colorado River flows are declining, so the cost of seeking a second source in Lake Powell—\$1.8-2.0 billion—seems an unreasonable burden for such an unreliable source.

Commenting guidance:

- The BOR must show that a “second source” of water is reliable; that water will be available in Lake Powell and that the LPP can be a permanent water supply.
- The BOR’s analysis of the security of the water supply for the LPP does not demonstrate that Lake Powell will be a reliable “second source”; it doesn’t meet the test for scientific integrity and accuracy of information required by NEPA.
- The BOR must provide examples of other communities with reasonable GPCD demand and which have similarly large watersheds and that have a “second source” of water before asserting that Washington County must have such a second source.

Personal Note/Experience:

- Are you troubled because the BOR blindly accepted the assertion that “Washington County needs a second source of water”? Explain in your personal comment how you feel about this decision.
- Have you lived in another city/region where they did not have a second source of water and they managed to grow and thrive? Write comments about that experience.

Topic 2: BOR arbitrarily dropped consideration of a viable, reasonable water conservation alternative.

What the Draft EIS says or doesn’t say:

- BOR declares every alternative must provide 86,000 AFY of water (from a “second source” outside the Virgin River watershed), based on their assumptions of 2075 population of 594,660, 240 GPCD, and a “system loss” of 15.4%.
- BOR’s calculations appear to be contrived to show that conservation is not economically feasible; that any “conservation-only” alternative is too expensive.
- The BOR writes, “*The DEIS has been prepared in response to the Proposed [Lake Powell Pipeline] Project and does not attempt to compel Washington County residents to modify, change, or curtail their current culture, lifestyle or social expectations.*” (DEIS page 15)

- BOR unreasonably asserts that meeting a demand of 176 GPCD, as proposed in the Local Waters Alternative, that relies only on the Virgin River watershed, would require extensive xeriscaping, including converting existing homes, and 100% conversion of agricultural water use to M&I use, which is not the case.
- BOR lauds Washington County for reducing GPCD by 30 percent since 2000, but then expects it will take until 2045 to achieve only modest further reductions (to 240 GPCD) and expects no improvement thereafter.

Why this is a problem:

- The county’s excessive water use—302 gallons per capita per day (GPCD)—is more than twice that of Phoenix and nearly three times that of Tucson.
- In 2015, Washington County used 302 GPCD; by reducing demand just 1% each year we could eliminate the need for 86,000 acre-feet of additional water by 2060, even using BOR’s population projections.
- BOR failed to honestly explore reasonable alternatives such as those relying on water conservation, which were requested by many people during scoping.
- Water conservation alternatives could be implemented incrementally at lower cost and with greater reliability, obviating the need for the LPP altogether; such water conservation practices have been very successful in other western cities.
- Water conservation has been shown by other communities (such as the Southern Nevada Water Authority) to be much less expensive and less risky than investing in water transfers from remote basins and sources.

Commenting guidance:

- The BOR only analyzed a very narrow “No Action” alternative and two pipeline construction alternatives and must consider a reasonable water conservation alternative.
- The BOR must evaluate reasonable alternatives to the proposed pipeline that would avoid or minimize adverse effects. It is not reasonable to reject water conservation alternatives because they do not provide a “second source” of water.
- The BOR must consider a water conservation alternative such as the Local Waters Alternative that would rely on local sources of water and could provide a predictable, stable, less expensive, and incrementally implemented method for satisfying water needs.
- The BOR must expect water use for Washington County that is similar to the current reality in, and achievements by, other southwest communities.
- The BOR must include all future water supplies from municipal and other sources and must use reasonable assumptions—not 100 percent—for agricultural water conversions.
- Just because BOR, as the permitting agency, or the Washington County Water Conservation District (WCWCD), as a water wholesaler, cannot require strict water conservation practices, doesn’t mean that water conservation cannot be implemented by retail water providers to dramatically reduce demand.

Personal Note/Experience:

- Are you a strong supporter of water conservation as an ethic for living in a dry, desert area? Add this commitment to your comments.
- Are you disturbed because the BOR would favor a multi-billion-dollar pipeline when Washington County has among the highest rates of water use in the country? Express that concern in your comments.
- Have you lived in another city/region where water conservation has successfully reduced the average amount of water used per person? Write some comments about that experience.

Topic 3: BOR artificially inflates Washington County's need for water.

What the Draft EIS says or doesn't say:

- BOR bases its purpose and need on unsupported assumptions, including:
 - BOR introduced an arbitrary 15-year “reserve buffer” requirement that calculated water demand for 2060 but calculated for a population in 2075.
 - BOR does not provide evidence for projected “system loss” of 15.4%.
- BOR does not reconcile their assumptions about Washington County's future water demand per capita to other areas in the southwestern United States where less water is used.
- BOR does not fairly consider future technology—for example, new alternatives to reverse osmosis—which might extend our available local water.

Why this is a problem:

- Many southwest communities have proven that increasing population does not necessarily require increasing water demand, so BOR should not assume that simple growth demands more water.
- Colorado River water diversions by Nevada, Arizona, and California have been declining, even as populations are increasing; even in St. George, increased population has used less water per capita over the past five years without any severe water conservation efforts.
- WCWCD claims many millions of dollars were spent to reduce system losses, which they may call “water conservation,” begging the question of why they still forecast a 15.4% loss.
- Use of the 15-year “reserve buffer” and continuing to use 15.4% “system loss” are contrivances to justify the LPP.
- BOR has not considered new technologies that can save water or yield more water from existing sources.

Commenting guidance:

- The DEIS does not adequately characterize future water use; BOR should project future per capita demand that is similar to the current reality in, and achievements by, other states, metropolitan areas, and water districts in the southwest U.S.
- The DEIS did not identify all potentially available sources, so BOR must quantify the total available water supply and include reasonable increases in yield from sources other than WCWCD's supply (i.e., cities, irrigation companies, etc.).
- The BOR must provide a fair and accurate projection to determine how much additional population could be supported by these additional supplies as demand is reduced to levels seen in other, similarly semi-arid, places.

Personal Note/Experience:

- The history of the LPP has been mired by misinformation as well as a serious lack of transparency. The DEIS continues this pattern with an incomplete and inadequate forecast of water need. If this is a concern to you, express your displeasure to the BOR.
- For years LPP proponents have misused data to attempt to distract from the fact that per capita/water use in Washington County is among the highest in the nation. The DEIS continues this pattern. If this irritates you, express your concern to the BOR.

4. Issue: Under state law, all Utahns would be responsible for \$2 billion or more of public debt if the Lake Powell Pipeline is constructed.

What the Draft EIS says or doesn't say:

- BOR fails to analyze how a multi-billion-dollar project would affect citizens throughout the state, and the Washington County families and businesses who must eventually repay the state.
- BOR expects the costs of the pipeline, including interest during construction, would be financed by the state and repaid by Washington County residents. The financed costs are estimated at \$1.590-1.643 billion, which is equal to a debt burden in Washington County of \$8,700 per person if built-in 2020, \$6,450-6,670 per person if built-in 2030 (lower in 2030 due to larger population).
- BOR's socioeconomic analysis covers only four counties (Washington, Kane, Coconino, and Mohave), ignoring how this project would affect Utah's bonding limit.
- BOR does not analyze the effects of different terms of financing, nor does it take into consideration recent events such as an economic recession resulting from the 2020 novel coronavirus pandemic.
- BOR doesn't acknowledge that education, social services, health care services, and public employment are already facing many challenges competing for funding, making paying for the LPP an even more significant burden for residents.

Why this is a problem:

- The terms of financing have not been determined yet, so it's difficult to assess the actual burden on the residents and the state.
- The State of Utah's audit 2019 found that the LPP's financing terms in the 2006 LPP Development Act are vague, making the Lake Powell project's financial viability questionable for the state and residents.
- Already in 2020, the state has held five special sessions to address Utah's expected budget shortfall due to COVID-19 pandemic costs and decreasing tax revenue.
- The LPP would be a Utah project that will encumber state bonding capacity for decades, which means less funding for state needs such as education, highways, and public health.
- The lack of transparency on costs is troubling for a public project of this size, especially considering how long this issue has been studied.
- Lower than projected population growth would increase the debt burden per person and could make the project unaffordable for residents.
- A 2019 Utah legislative audit found that Washington County's ability to pay relies on growth, but low population growth caused by high repayment costs for LPP could make the project unaffordable.

Commenting guidance:

- The BOR is deficient because it doesn't determine whether the LPP project is financially feasible for WCWCD.
- The BOR doesn't address the adverse economic effects of paying for the LPP on residents and businesses.
- The BOR doesn't address the economic impact on residents and businesses, especially low-income residents in Washington County who are faced with a quadrupling of water rates, doubling of impact fees, and property taxes going to WCWCD increasing by more than 50 percent.
- BOR must disclose all of the actual costs of the pipeline, including the financing costs.

Personal Note/Experience:

- Have you had personal experience living in a city or state that was financially overextended by a large project that was not needed? Share this experience in your comments.
- Are you alarmed because the LLP will rob public dollars from other more pressing needs in our state like education, healthcare, etc? Express your concern in your comments.
- How does this pandemic economy impact your concerns about the costs of building the LPP? Tell the BOR about your concern.

Topic 5: The LPP water right appears to violate 1922 Colorado River Compact.

What the Draft EIS says or doesn't say:

- BOR does not disclose that the UDWR has not secured the consent of the other Colorado River Basin states or the Congress to transfer water from the Upper Basin to the Lower Basin, in violation of the Colorado River Compact.
- BOR does not disclose objections from the Arizona Department of Water Resources to the transfer of water from Upper to Lower Basin.

Why this is a problem:

- The Lake Powell Pipeline would transfer water from the Upper Colorado River Basin (above Lee Ferry, Arizona) for use in the Lower Basin (Virgin River watershed). As a state in the Upper Colorado River Basin, Utah must first secure approval from all of the other six Colorado River states and the United States Congress.
- Securing approval from the other states could potentially and significantly slow the approval process, especially in times of shortage.
- A 2017 letter to the Utah Division of Water Rights from the Arizona's Department of Water Resources notes that this transfer may violate the Colorado River Compact.
- BOR only notes—does not require—that Utah “is addressing this question”, and not seeking approval from, the other Colorado River Basin states about such a transfer when, especially in times of shortage, approval by other basin states is questionable.
- Utah must also seek approval from the U.S. Congress for interstate agreements related to the Colorado River Compact.
- Utah has known about this issue for a very long time and has not taken the necessary steps to resolve it.

Commenting guidance:

- Utah doesn't have approval to move this LPP water right from the Upper Basin to the Lower Basin. Consequently, before approving the LPP, Utah must secure the permission from the other Colorado River states and the Congress to transfer water from the Upper Basin to use in the Lower Basin, as required by the Colorado River Compact.
- The DEIS must include a requirement that Utah has secured the necessary permissions before approving the Lake Powell Pipeline.

Personal Note/Experience:

- Does it disturb you because we would get this far in the LPP planning and approval process after taxpayers paid over \$36 million for these studies and Utah may not even have the legal water right to use the water over the long term? Express your concern that the DEIS doesn't analyze the law of the river in this situation.

Topic 6: Utah has already allocated water rights to more than 100% of the physical water within its Colorado River watershed, meaning senior (older) rights will likely prevent use of the LPP water right during current and future droughts.

What the Draft EIS says or doesn't say:

- BOR has left any and all determinations of water availability and water rights within Utah up to the state.

Why this is a problem:

- Water rights have a priority date, and a senior water right has an earlier date of water use; later dates of use constitute a more junior right.
- The LPP water right is junior in priority to the Northern Ute Tribe, Navajo and other tribal rights, other federal reserved water rights not yet determined, water rights established before 1958, the Central Utah Project's Bonneville Unit (as well as the Lower Basin states and Mexico).
- The water right being used to supply the LPP doesn't have high enough priority status to guarantee the water will be available over the long term.
- As water supplies decline the competition for physical water will increase and result in litigation and uncertainty for junior water rights holders such as the LPP because their junior rights may not entitle them to use the water. This, combined with the uncertainty of future water in the Colorado River due to climate change, makes relying on water rights from Lake Powell very risky.
- BOR owes it to the other states in the Colorado River Compact to ensure that Utah is not over allocating its physical water and making it even more difficult for Utah to meet its Compact obligation to supply water to the Lower Basin.

Commenting guidance:

- The BOR must require Utah to provide evidence that, after the LPP is in use, adequate water will still be available to the Lower Basin in compliance with the Colorado River Compact.
- The BOR cannot ignore that the Northern Ute Tribe has senior water rights over the LPP—unlike the states. BOR has had a critical role in protecting Native American water rights in the Colorado River; these rights are senior to any Utah right and BOR must protect them but, by approving the LPP, they would be undermining tribal rights.

Personal Note/Experience:

- Are you concerned because building the LPP would increase the likelihood of lawsuits within the state over who has the rights to the decreasing physical water flows within our state and the Colorado River? Tell the BOR what you think.

Topic 7: A quagga mussel infestation would threaten the pipeline, local reservoirs, municipal infrastructure, businesses, and homes, and reduce our water quality.

What the Draft EIS says or doesn't say:

- BOR acknowledges that transferring water from Lake Powell to Sand Hollow Reservoir near Hurricane, Utah, could introduce invasive aquatic organisms to the Virgin River basin and municipal water supplies.
- BOR assures us that, should Sand Hollow Reservoir become infested with quagga mussels, despite all the prevention and control measures outlined in Section 1.3 of Appendix C-12, Aquatic Invasive Species, there are measures that could control any transfer to the Virgin River (see Section 2.2.2 in Appendix C-12, Aquatic Invasive Species).
- BOR fails to adequately address the potential cost to eradicate quagga mussels in systems operated by either WCWCD or municipalities, or in individual homes.
- BOR fails to analyze the effect and cost of chemicals used to eradicate quagga mussels, and potential effects on the quality and safety of drinking water.

Why this is a problem:

- Quagga mussels have moved across our country to infest many water bodies; they can plug even large-diameter water lines, resulting in treatment costs of millions of dollars.
- Quagga mussels are a non-native nuisance species that cause severe economic and ecological damage. Since 2012, thousands of adult quagga mussels have been found in Lake Powell attached to canyon walls, the Glen Canyon Dam, boats, and other underwater structures.
- The UDWR's "November 2015 Draft Study Report 2 Aquatic Resources" noted "[Quagga mussels] have demonstrated the potential to both damage ecosystems and to require significant and costly, but often fruitless, investment to manage and control their effects on structures and equipment in the water supply industry."
- In 2016, the National Park Service (NPS) expressed concerns to the Utah Department of Water Resources (UDWR) about transferring water from Lake Powell to Sand Hollow. Utah Water Development Commission members also voiced concerns about the spread of quagga mussels to municipal and industrial water systems.
- BOR proposes a chemical room in every pump station, but UDWR acknowledges that it "may not be possible to absolutely manage this potential problem to any practical extent..."
- Treating quagga mussels poses water quality concerns because the treatment used creates Trihalomethanes (THM's) when chlorine reacts with organic matter in water.
- Studies show mussels are expensive to treat, and no treatment thus far has been foolproof because the filters cannot filter out the very early microscopic life stage.

Commenting guidance

- The BOR failed to analyze the effect and cost of chemicals used to eradicate quagga mussels, potential effects on the quality and safety of drinking water, and potential pollution of aquifer storage beneath Sand Hollow Reservoir.

- The BOR must include in the DEIS the risks and implications if mitigation measures are not successful since this will be the first major pipeline that will have to deal with the quagga mussel.
- The BOR must analyze the effects on water quality from quagga mussel waste products (e.g., sulfites, sulfates, nitrogen, ammonia, etc.) and decomposition within the pipeline and their ability to spread toxic algae.
- The BOR must evaluate the potential economic cost of treating quagga mussels in the pipeline, reservoirs, municipal systems, businesses, and homes.

Personal Note/Experience:

- Do you have personal experience with quagga mussels in Lake Powell or elsewhere? Summarize that experience in your comments.
- Does it disturb you to learn that we are this far in the LPP planning process and the state has no real plan to ensure that the LPP will not bring the quagga mussel to Washington County water supplies and facilities? Express to the BOR that your concerns are not addressed in the DEIS.

Topic 8: Federal lands are owned by all Americans and the EIS should look beyond economics to protect public lands for future generations.

What the Draft EIS says or doesn't say:

- On a list of 19 resources evaluated in the DEIS, both LPP route alternatives have cumulative environmental effects; while a conservation alternative would have little or no effect.
- The building of the LPP would require extensive excavation of soils and would be more than was used in cement to build Hoover Dam.
- BOR found that areas of Mojave desert tortoise habitat would be affected by building the LPP.

Why this is a problem:

- The National Environmental Policy Act (NEPA) was intended to move agencies such as BOR to prefer alternatives that minimize damage to the natural and human environment; however, the BOR's preferred alternative is the most damaging alternative.
- LPP construction adds to the industrialization of US 89, which is a scenic corridor in the Grand Staircase Escalante National Monument (GSENM). The GSENM boundary was illegally reduced by the Trump administration to allow fewer restrictions to building the LPP.
- LPP would include six hydroelectric plants and five pump stations with power lines, high steel power poles connecting them to existing power grids, parking lots, substations, lights, new access paved roads, regulating tanks and reservoirs, manholes, air release valves, vacuum relief valves, blow off valves, fencing, buried forebay tanks, buried surge tanks, pipeline inspection gauge (pig) retrievals used to clean the pipe, and surface overflow detention basins, all of which require weekly maintenance.

- LPP infrastructure would scar the scenic beauty of desert landscapes, disturb wildlife, and expose archeological and cultural sites along its route.
- LPP facilities would be visible from US Highway 89 and other highways along vast, scenic areas, compromising views for untold thousands of visitors, and affecting tourism.
- Habitat for the threatened Mojave desert tortoise is already under stress due to development pressures; LPP construction activities would add additional stress.
- These lands draw American tourists from around the country and provide valued outdoor recreation opportunities and would be permanently scarred by LPP's infrastructure.
- The scenic beauty of our public lands in Washington and Kane counties is world-renowned and drives our economies, providing thousands of jobs in hospitality and tourism. Visitors driving to different National Parks and the Grand Staircase Escalante National Monument would be adversely affected by the visible scars from building the LPP and the infrastructure to support it.
- Scars from the LPP would harm scenic beauty important to Utah's economy which is transitioning to tourism and outdoor recreation, an industry that provides 110,000 direct jobs and \$3.9 billion in wages in the state of Utah in 2017.

Commenting guidance

- The BOR's plan to mitigate impacts to Mojave desert tortoises is insufficient to meet the need of protecting these threatened animals.
- The DEIS (page 99) only considers impacts within one mile of the pipeline, which is insufficient as it omits completely the impact of the necessary infrastructure that has to be built to support the pipeline.
- The BOR failed to consider the value of pristine land lost and scarred for future generations.
- The BOR must assess economic effects of lost scenic values on tourism and major events in the region.
- The BOR omits the effects of greenhouse gas emissions resulting from LPP cement.

Personal Note/Experience:

- The LPP will have a major impact on views, recreational value, land, and wildlife along its 140-mile length (Highway 389/89 corridor). Have you recreated in this area or simply driven through it? Express your experience of this beautiful area to the BOR.
- Are you troubled that the BOR is proposing approval of a damaging pipeline project when water conservation is a viable, less expensive option with little or no environmental damage? Express this concern in your comments.

Issue 9: BOR uses a concept called “benefits transfer” to justify the entire cost of the LPP.

What the Draft EIS says or doesn't say:

- BOR invokes a questionable “benefits transfer” economic analysis method to calculate “Water Supply Reliability Benefits” that would supposedly accrue to Washington County if the LPP is built.
- BOR uses 100 years to estimate the present value of these water supply reliability benefits and calculates a “Best” current value of \$1.879 billion (oddly close to the estimated total cost of the project), and based on projected growth at 2.516% per year for 55 years and then reduced by 50% for the remainder of the 100 years.

Why this is a problem:

- The DEIS provides an estimate of benefit due to water reliability of \$1.879 billion (table 3.2-8, page 241). But, it doesn't give any analysis of the reliability of the project. It assumes it is 100% reliable, and it is not. We suspect, at times, there be limited to lower or no yield at all.
- BOR grasps for a “benefits transfer” economic method to find ways to justify the cost of the LPP—in terms of benefits from avoiding a shortage—choosing values on the high end of their range of values, equal to \$300 per household and \$1,800 per commercial establishment. But this assumes benefits in water security based on an economic analysis from other areas that BOR fails to confirm.
- Using a present value period of 100 years is excessive, especially given the trends for how climate change may affect Colorado River flows.

Commenting guidance:

- BOR should not rely on very hypothetical models with unfounded assumptions, such as “benefits transfer” of water security, to quantify LPP benefits.
- A full cost/benefit study should be explicitly done for Washington County and invite input from a third party and objective economists.
- If BOR insists on using a “benefits transfer” method and expects residents to accept it, they must reveal the base study case and the details behind that study.

Personal Note/Experience:

- The ‘benefits transfer’ approach is a sleight of hand short cut to avoid the hard work of identifying the real costs and benefits of the LPP for Washington County residents? If this is unacceptable to you, make it known to the BOR.
- The history of the LPP is filled with examples where proponents grasp at some way, any way, to justify the multi-billion-dollar cost and environmental damage. “Benefits transfer” is but the latest example. If this upsets you, make your concerns known to the BOR.

CSU's opposition to the LPP is supported by extensive research conducted by our team who developed the following documents.

The Conserve Southwest Utah Position Statement and The Rationale.