

Comment # Label	NPS Original Commenter
NPSCmt59	ELJ - NPS Glen Canyon National Recreation

Comment # Label	NPS Original Commenter
NPSCmt114	MW

**Original NPS Comment**

The NPS requests the following additional topics for inclusion in the cumulative impacts analysis: infestation of non-native mussels in Lake Powell future water pipeline project (Central Arizona Water Pipeline Project, Bureau of Reclamation lead), global climate change/regional drought, ongoing Utah or Arizona Departments of Transportation road work, GLCA Off-road Vehicle Management Plan, South Central Community College project/ROW (US 89)

## Original NPS Comment

Based on NPS calculations, diversion to the LPP may account for 1-2 ft drop in head at Lake Powell, which could dramatically affect hydrology. This in turn, may trigger basinwide drought contingency plans that release water from other upstream reservoirs to maintain minimum elevations at Lake Powell. Thus, the effects of diversion through the LPP could potentially affect reservoir elevations at, and releases from, Flamingo and Aspinall. Please ensure analyses models extended drought conditions and reports the effects to Lake Powell elevations and the frequency that Lake Powell is at or below minimum power pool. Per NPS comments dated July 5, 2012; we encourage additional analyses that include hydrologic conditions within the Colorado River watershed (extremely low inflow and low lake level conditions.) NPS Comment Disposition analysis, and discussion of the effects of the LPP withdrawals on LP elevations is incomplete. The current modeling effort only evaluated withdrawals with the 2007 Interim Guidelines in effect (modeled LPP depletions began in 2024, the 2007 Interim Guideline expire in 2024/2025). In 2024 were only 15,468 AF (and not much greater by 2026); full build-out (86,249 AF) was not until 2048/2049. So, the LPP at full build-out operating regime (i.e., the 2007 Interim Guideline), was never modeled or analyzed. BOR report states that the effects of the LPP will be modeled at full build-out. Recent modeling by Colorado West Slope water users suggested that small differences in LPP elevations in critical years could result in the frequency and duration of LP to fall below minimum power pool elevation because either the inflow hydrology coupled with the antecedent content was insufficient to maintain LP elevations above minimum power pool in that year, or because a slightly lower elevation triggered a different Operating Tier under the Interim Guidelines and the subsequent releases under the new tier causes LP to drop below power pool. Thus, the elevation associated with the LPP withdrawals (esp. at full buildout) could trigger a different Operating Tier under the Interim Guidelines and cause LP to fall below minimum power pool when otherwise it may not have (or at least not for as long or as often) and thus trigger Drought Response actions at other reservoirs. [BOR held all demands (except reasonably foreseeable project) constant at 2015 levels in order to model just the effects of the LPP. If (increasing) demands were included, the likelihood of LP falling below minimum power pool may be even greater, even without the LPP.]

**UDWRe March 31, 2017 Response**

Please see the Extended Narrative document for the response to NPS Comment No. 59.

**UDWRe March 31, 2017 Response**

Please see the Extended Narrative document for the response to NPS Comment No. 114.

**Additional NPS Comment**

OK, NPS to review and provide any additional comments in the impact analysis portion of the EIS.

### **Additional NPS Comment**

The March 31, 2017 comment response resolves questions regarding the CRSS modeling assumptions on future depletions and 2007 Interim Guidelines operations.

NPS asks for additional clarification on cumulative effects on upstream reservoirs under a 10 percentile scenario.

NPS asks that the discussion on modeling uncertainties in the U.S. Bureau of Reclamation modeling attachment be included in the comment response.



<b>Additional NPS Comment Reviewer</b>	<b>UDWRe Updated Response</b>
E. Janicki	Please see the revised attached Narrative Response document for the response to comment NPS No. 59.

<b>Additional NPS Comment Reviewer</b>	<b>UDWRe Updated Response</b>
E. Janicki	Please see the revised attached Narrative Response document for the response to comment NPS No. 114.

To be reviewed	New comment	Comment #	Comment # Label	NPS Original Commenter	NPS Original Comment
	1	51	NPSCmt51	ELJ - NPS Glen Canyon National Recreation Area	The NPS requests that global climate change be analyzed for cumulative impacts to surface water as global climate change (regional drought) would have a cumulative impact on surface water levels when considered with additional water withdrawals from Lake Powell.
1	1	113	NPSCmt113	RS - IMR-NR	The NPS requests further analysis regarding withdrawals and what withdrawals might indicate about the variation/fluctuations in reservoir levels that will occur in addition to what already exists from normal operations and climate change. The effects, including cumulative effects, to cultural resources along the reservoir shoreline need to be considered and addressed in this document.





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The image shows a light blue rectangular area, possibly representing a page from a notebook. The area is bounded by a thin black line on the top, bottom, and right sides. On the left side, there are several horizontal black lines, suggesting a margin or a list of items. The overall appearance is that of a clean, organized page.







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**UDWRe March 31, 2017 Response (NEED TO CROSS CHECK THESE RESPONSES WITH SUBMITTAL)**

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Please see the Extended Narrative document for the response to NPS Comment No. 51.

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Please see the Extended Narrative document for the response to NPS Comment No. 113.

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NPS Comment Disposition	NPS Disposition Reviewer
OK, NPS to review and provide any additional comments in the impact analysis portion of the EIS.	E. Janicki
<p>NPS asks for additional clarification as to whether the cumulative effects between the action and no action are indeed the same, and if so, how.</p> <p>NPS asks for additional clarification on the influence of climate change on cumulative effects.</p> <p>The NPS understands that the “No Action” alternative assumes the existing water right is being utilized. However, the on-the-ground conditions today are that the water right is not currently being utilized. Therefore, effects from a utilization are not being seen on the ground. The “No Action” alternative should reflect present day conditions (that being the ~86,000 a-f which is not currently being utilized anywhere in the system). We understand that the modeling for the “No Action” alternative is assuming the utilization of the ~86,000 a-f at undisclosed locations within the watershed. The analysis does not reflect what changes would be seen between the current conditions today (water right not currently being utilized) with the Action Alternative (water right being utilized and withdrawn at a disclosed location). Perhaps, multiple scenarios under the “No Action” alternative which depicts the current on the ground conditions (water right not being utilized) as well as the utilization of the 86,000 a-f water right could help more accurately demonstrate what the true on-the-ground impacts will be of utilizing the existing water right compared to the on-the-ground conditions of the right not being utilized today. If absent the multiple scenarios, a statement in the EIS document which discloses very clearly that the current on-the-ground (no utilization) condition is not being represented in the “No Action” alternative should be included for clarity for the readers and to prevent confusion.</p>	













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**UDWRe Updated Response**

For  
District  
Review

Notes

NPS Comment  
Disposition to  
be addressed

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Comment noted.

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