Comment # Label | Original BLM Comment | Original UDOW Response | UDOW March 2017 Response | Additional BLM Comment | BLM Reviewer | UDOW Updated Response
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BLM 708 | let the page: Please edit as follows: “… including Buckle’s Garb is, in part, managed as a wilderness…” Strike line on page Please edit as follows: “… not in wilderness study area and would be adjacent to…” Strike line on page. Would be “Mudflats” rather than “Beauchay.” | 

Comment: 

The updated text from the first, second, and third paragraphs of the above comment have been incorporated. The terminology used for riparian function analysis was identified in the approved study plan, which was developed in consultation with BLM and addressed BLM review comments. 

Although the paragraph preceding the referenced text there is a brief description of the riparian environment at the Paria River crossing, the subject of this section is the aquatic resources in the stream and the referenced text is referring to the stream functionality, and not the riparian area functionality, and the associated aquatic resources. In order to create the “functionality” reference clear, the second sentence of the third paragraph of section 5.3.6.2.6, Chapter 5, Exhibit E of the License Application, incorporating the best sentence “the functionality of reaches of the river above the Paria Canyon-Vermilion CPR Wilderness is known to be impaired…” 

The revised text is still incorrect - the revised text needs to read: “The functionality of reaches of the river above the Paria Canyon-Vermilion CPR Wilderness is known to be impaired…” | 

Lorraine Christiansen | 

| BLM 717 | Why is there no discussion of Kanab Creek, the Virgin River, and Sand Hollow Reservoir in this analysis? [5.3.4.2.2], since they were introduced in Section 5.3.4.1.7? Please add this discussion (even if no impact, they should be mentioned). | 

UDOW's view is that the text with regards to the first part of the comment is appropriate. The text has been revised to address the second part of the comment. 

Please see the attached extended narrative document response to BLM Comment 714, for the response to BLM Comment No. 717. | 

The comment noted here at BLM 717 was the actual BLM 717 comment (BLM 716 was dated instead). Therefore, comment was on whether the response is okay. | 

Lorraine Christiansen | 

| BLM 718 | Several comments: Why is there no discussion of Kanab Creek, the Virgin River, and Sand Hollow Reservoir in this analysis, since they were introduced in Section 5.3.4.1.7? Please add this discussion (even if no impact, they should be mentioned). | 

UDOW’s view is that the text is appropriate. 

Please see the response to BLM Comment No. 412 for an explanation of the differences between Exhibit E in the License Application and NPA documents. Please see the Extended narrative document for the response to BLM Comment No. 718. 

Thank you for adding this. Note that the reference “The Proposed Action operation would have no measurable effects on aquatic resources in Kanab Creek…” typically has no base; it is essentially repeated in the second paragraph. It is more appropriate in the second paragraph since the first only discussion construction effects. Thus, biggest deletion | 

Lorraine Christiansen | 

| BLM 719 | Several comments: Why is there no discussion of Kanab Creek, the Virgin River, and Sand Hollow Reservoir in this analysis, since they were introduced in Section 5.3.4.1.7? Please add this discussion (even if no impact, they should be mentioned). | 

UDOW’s view is that the text is appropriate. 

There is a discussion of the effects on the Virgin River in Section 5.3.4.5.5. A sentence is added to the end of Section 5.3.4.5.5: No Lake Powell Water Alternative, Chapter 5, Exhibit E of the License Application as follows: The No Lake Powell Water Alternative would have no effect on Kanab Creek or Sand Hollow Reservoir. 

Need to add a justification/rationale on why no effects. Can’t just say no effect without a rationale. | 

Lorraine Christiansen | 

| BLM 725 | Why do Ex H and C not need a sub-section on analysis of impacts from the No Action Alternative (which is currently missing) – please add. | 

The text has been revised to address the comment. 

The differences between the No Action Alternative and the No Lake Powell Water Alternative were discussed in the meeting between BLM and the proposer on March 17, 2017. Please see the response to BLM No. 467 in the attached narrative response document for a partial explanation to BLM No. 721. An explanation of why there would be no effects is added. Section 5.3.6.2.6: No Action Alternative, Chapter 5, Exhibit E of the License Application is revised to read: The No Action Alternative would have no effect on aquatic resources in the LPP study area as there would be no federal action requiring a water pipeline crossing the Paria River and there would be no pipeline water release to the Paria River which could affect aquatic biology transfer to the river. Existing aquatic resource conditions would continue to evolve subject to natural or other anthropogenic influences and factors. Regarding the comparison of effects between the No Action Alternative and the No Lake Powell Water Alternative, the latter alternative would involve implementation of additional and different water supply development and conservation measures than the No Action Alternative. As a result, the effects would be different between the two alternatives. 

May with this last one should suggest, to make the analysis in the EB more clear, that Sec. 5.3.6.2.6 describe [here] the differences between the No Lake Powell Water alternative and the No Action Alternative - No would then more clearly demonstrate the differences in the effects of the two alternatives, which seem so similar, in an fact different. | 

Lorraine Christiansen | 

Lake Powell Pipeline
BLM Revised Comment Responses

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January 17, 2019
Utah Board of Water Resources
Comment # Label | Original BLM Comment | Original UD/Wife Response | UD/Wife March 31, 2017 Response | Additional BLM Comment | BLM Reviewer | UD/Wife Updated Response
--- | --- | --- | --- | --- | --- | ---
BLM 724 | comment: need to discuss/explain in more detail ... what is the basis for the conclusion? (right now it is an unsubstantiated claim.) | the cumulative effects of the No Lake Powell Water Alternative, which would eliminate residential outdoor watering, would reduce non-irrigated runoff flows to the Virgin River throughout the St. George metropolitan area, which is analyzed in the Final Alternatives Development Study report. The reduced flow, combined with water diversions from the Virgin River, would have significant adverse cumulative effects on aquatic resources. | the effects of the No Lake Powell Water Alternative were discussed during the meeting between BLM and UD/Wife on March 31, 2017. Based on these discussions we understand that BLM’s primary concern is that USGSS documents cited in the analysis of changes to urban groundwater recharge appear to contradict the conclusions of the groundwater impacts analysis in the environmental report. The impact analysis for the alternative is based on localized recharge of the shallow subsurface soils in the vicinity of the urban irrigation and describes the potential effects of changes to groundwater resources from the alternative. UD/Wife agrees with BLM that these site-specific changes to groundwater conditions are not in total agreement with conditions described in the two USGSS reports. We recognize these differences do exist and support the cited USGSS documents describe groundwater conditions at a different scale than is described in the impact analysis for the alternative as the reason for the differences. In addition to the response below, please refer to the attached Narrative Response document for the response to this comment and BLM comment No. 694. | there is no response to either Comment No. 694 or this comment in the extended Narrative Response document. | Sara/Christian | see update to BLM Comment No. 694 and BLM Comment No. 695 in the updated Extended Narrative Response to BLM Comments for additional clarification regarding BLM Comment No. 724.

BLM 725 | Water use claims. There needs to be a sub-section on analysis of impacts from the No Action Alternative (which is currently missing) — please add... | the text has been revised to address this comment. | the explanation of the effects is added: Section 5.3.6.4-5 No Action Alternative, Chapter 5, Exhibit E of the license Application: The effects of the No Lake Powell Water Alternative presented below are localized, anthropogenic changes imposed in addition to other natural and man-made conditions described in other reports. | A694 | Sara/Christian | see update to BLM Comment No. 694 and BLM Comment No. 695 in the updated Extended Narrative Response to BLM Comments for additional clarification regarding BLM Comment No. 724.

BLM 767 | recommend a simple summary table with the following columns: species/status/Effect determination (break out the species determination and initial habitat determination) Detailed Notes | your comment has been noted. | the requested summary table is incorporated into the appropriate section. Section 5.3.7.2.1.2, Chapter 5, Exhibit E of the License Application is a subsection describing the significance criteria identified for federal sensitive species and state/local agency species of concern. The significance criteria are identified to determine if the effects of the Proposed Alternative and alternatives on sensitive aquatic species and their habitat would be significant or not significant. BLM Comment No. 770 requests the text of Section 5.3.7.2.1, Chapter 5, Exhibit E of the License Application be recognized more clearly present the results of the environmental effects analysis for special status aquatic species. Section 5.3.7.2, Chapter 5, Exhibit E of the license Application is recognized as requested by BLM in BLM Comment No. 770 and is provided in the attached Extended Narrative Document. | all paragraph—step 3rd paragraph—not pertinent to BLM 767, so delete this text. | Sara/Christian | see update to BLM Comment No. 770 in the updated Extended Narrative Response to BLM Comments for additional clarification regarding BLM Comment No. 724.

BLM 770 | do we have a section on “Potential Effects and Alternatives Eliminated From Further Analysis”? instead, organize this entire analysis the way the other resource sections are: 5.3.7.2.2 Proposed Action 5.3.7.2.2.1 Construction Effects 5.3.7.2.2.2 Operations and Maintenance Effects 5.3.7.2.2.3 Effects Determination 5.3.7.2.2.3.1 Existing Highway Alternative 5.3.7.2.2.3.2 Construction Effects 5.3.7.2.2.3.3 Operations and Maintenance Effects 5.3.7.2.2.3.4 Effects Determination 5.3.7.2.2.3.5 No Lake Powell Water Alternative 5.3.7.2.2.3.6 Construction Effects 5.3.7.2.2.3.7 Operations and Maintenance Effects 5.3.7.2.2.3.8 Effects Determination 5.3.7.2.2.3.9 No Action 5.3.7.2.2.4 Construction Effects 5.3.7.2.2.5 Operations and Maintenance Effects 5.3.7.2.2.6 Effects Determination The “effects determination” subsection for each alternative would then discuss the overall effects of each alternative (which is what will go into the biological assessment). Thus, all of the text in Sections 5.3.7.2.2.1 through 5.3.7.2.2.6 and it should be merged into the overall analysis of impacts by alternative, and each sub-section “potential effects from [project]” should be eliminated from further analysis. | the document was organized and written in accordance with NEPA guidance. | please see the extended Narrative Response document for the response to BLM Comment No. 770. | This is MUCH better. However, there are still some issues with the organization. For example, note that this is Section 5.3.7.2.2.2 Proposed Action, yet the Extended Narrative Response document includes discussions that all the other alternatives as well. Since the section is for the Proposed Action, those other paragraphs should be removed from here and placed in their own separate subsections. | Sara/Christian | see update to BLM Comment No. 770 in the updated Extended Narrative Response to BLM Comments for additional clarification regarding BLM Comment No. 724. The recognized and simplified sections in the response to BLM Comment No. 770 are included in the updated Extended Narrative Response to BLM Comments.
<table>
<thead>
<tr>
<th>Comment # Label</th>
<th>Original BLM Comment</th>
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<tbody>
<tr>
<td>BLM 795</td>
<td>NEW SUB-SECTION: There needs to be a sub-section on analysis of impacts from the No Action Alternative (which is currently missing) – please add.</td>
<td>The text has been revised to address the comment.</td>
<td>An explanation of why there will be no unavoidable adverse effects is added. The following sentence is added to the end of Section 5.3.7.5.5 - No Action Alternative, Chapter 5, Exhibit E of the License Application: &quot;There would be no Federal action undertaken as part of the No Action Alternative and therefore there would be no cumulative effect on special status aquatic species.&quot;</td>
<td>New text needs to be revised to address &quot;unavoidable adverse effects&quot; rather than &quot;cumulative effects.&quot; Thus, please rewrite the new (added) text to read: &quot;There would be no Federal action undertaken as part of the No Action Alternative and therefore there would be no unavoidable adverse effects on special status aquatic species.&quot;</td>
<td>Lorraine Christian</td>
<td></td>
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</tbody>
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