

Comment # Label	Original BLM Comment	Original UDWR Response	UDWR March 31, 2017 Response	Additional BLM Comment	BLM Reviewer	UDWR Updated Response
BLM 463	There is no discussion in this section on biological soil crusts (cryptobiotic soils). This needs to be added since these soils would be disturbed/removed along much of the pipeline corridor.	A discussion of cryptobiotic soils has been added to the text.	Information on and discussion of biological soil crusts is added in several locations of the License Application. Please see the response to BLM Comment No. 463 in the attached Narrative Response document.	1st paragraph of revised text (for Subsection 5.3.1.1.6.1): Correct the spelling of "Mojave". Also, please note that biological soil crusts are also associated with sandy soils, not just gypsum soils. Last sentence of new text - please correct this to read "... and where actively grazed by livestock, the soil crusts may be broken and trampled in some areas." Just because livestock graze an area doesn't mean that crusts are damaged everywhere, as this implies. New second paragraph for Subsection 5.3.1.2.4 - Note that damage to soil crusts would not just occur from penstock construction, but also construction of power lines, roads, and staging areas. Vermilion Soils are not gypsum soils are they? Seems like they would be more sandy soils. Also, there needs to be substantially more analysis in this section - it's pretty sparse right now (although I do appreciate your adding this section). Last new paragraph (for Section 5.3.1.2.4.4) - damage to soil crusts would not just occur from penstock construction, but also construction of power lines, roads, and staging areas. Also, why would there be disturbance to more soil crusts in the Existing Highway alternative, versus the Proposed Action, when the alignment in the Existing Highway alternative would be in an area of previous disturbance? Seems like it should be the other way around.	Lorraine Christian	Please see the updated response to BLM Comment No. 463 in the Updated Extended Narrative Responses to BLM Comments.
BLM 523	Second paragraph, first sentence. "Existing gravel pits on public and private lands..." Please identify where these locations are. Can't say "the Existing Highway Alternative would have no significant effects resulting from spoil material disposal" until it is known where these locations are.	Refer to the response to BLM Comment 474.	Gravel pit sources are now identified through response to BLM Comment No. 522 in the first paragraph of section 5.3.1.2.4.7, Chapter 5, Exhibit E of the License Application, which has replaced the PLP in the FERC licensing process. Please see the response to BLM Comment No. 522 which provides that information.	Mostly okay - I recommend identifying that the three commercial gravel pits referenced (B-1, B-3 and B-5) are all existing pits. Also, would the 50 acres of disturbance be NEW disturbance ... this is important to state one way or the other.	Lorraine Christian	Please see the updated response to BLM Comment No. 522 in the Updated Extended Narrative Responses to BLM Comments.
BLM 539	Important Structures and Mineral Resources. Remember that this section (5.3.1) is impacts of the project on geology and soils not the impacts to the project FROM GEOLOGY/SOILS or impacts from the project on other resources. Thus, remove the part of this sub-section that discusses "Important Structures."	Refer to the responses to BLM Comments 470 and 472.	Please refer to the response to BLM Comment No. 473 for an explanation of the content of Section 5.3 and partial response to BLM Comment No. 539. This comment points out the difference between the information required to be submitted by FERC as part of the License Application process, which will be utilized in the preparation of the DEIS, and the actual NEPA analysis that will be performed during preparation of the DEIS. Edit requested is incorporated. The fifth sentence in Section 5.3.1.2.8.6 is revised to read: Therefore, no measurable or significant effects would occur.	1st paragraph - this format for the impacts analysis makes no sense to me, but if it's what FERC requires, we will wait and work with FERC to see what is in the EIS. Remainder of comment response is okay. (Note: Was this section heading revised to be "Structures and Important Mineral Resources" as has been done elsewhere?)	Lorraine Christian	The heading of Section 5.3.1.2.8.6 in Chapter 5, Exhibit E of the License Application is revised to read: Structures and Important Mineral Resources.
BLM 541	"Borrow materials for the Warner Valley Reservoir embankment dam would be supplied from local gravel pits and other material sources in the St. George metropolitan area." Where are these locations? They need to be identified NOW.	Refer to the responses to BLM Comments 474 and 523.	The locations of the borrow materials pits are provided. The text in Section 5.3.1.2.8.7, Chapter 5, Exhibit E of the License Application is revised to read: Borrow materials for the Warner Valley Reservoir embankment dam would be supplied from local gravel pits and other material sources in the St. George metropolitan area. Three commercial gravel pits (see B-4, B-5 and B-6 on attached Figure 2-6) would have available rock materials to meet borrow needs for the embankment dam. There would be no measurable effects and no significant effects on borrow materials supplied from St. George area sources.	Okay, except the edit made elsewhere ("...There would be no measurable or significant effects on ..." was not made here, and it should be.	Lorraine Christian	The last sentence of revised Section 5.3.1.2.8.7 in Chapter 5, Exhibit E is further revised to read: There would be no measurable or significant effects on borrow materials supplied from St. George area sources.