

Comment # Label	NPS Original Commenter	Original NPS Comment	UDWRe March 31, 2017 Response	Additional NPS Comment	Additional NPS Comment Reviewer	UDWRe Updated Response
NPSCmt59	ELJ - NPS Glen Canyon National Recreation Area	The NPS requests the following additional topics for inclusion in the cumulative impacts analysis: infestation of non-native mussels in Lake Powell, potential future water pipeline project (Central Arizona Water Pipeline Project, Bureau of Reclamation lead), global climate change/regional drought conditions, ongoing Utah or Arizona Departments of Transportation road work, GLCA Off-road Vehicle Management Plan, South Central Communication Fier Optic project/ROW (US 89)	Please see the Extended Narrative document for the response to NPS Comment No. 59.	OK, NPS to review and provide any additional comments in the impact analysis portion of the EIS.	E. Janicki	Please see the revised attached Narrative Response document for the response to comment NPS No. 59.

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NPSCmt114	MW	<p>Based on NPS calculations, diversion to the LPP may account for 1-2 ft drop in head at Lake Powell, which could dramatically affect hydropower production. This in turn, may trigger basinwide drought contingency plans that release water from other upstream reservoirs to maintain minimum pool elevations in Lake Powell. Thus, the effects of diversion through the LPP could potentially affect reservoir elevations at, and releases from, Flaming Gorge, Navajo, and Aspinall. Please ensure analyses models extended drought conditions and reports the effects to Lake Powell elevations and the frequency and duration that Lake Powell is at or below minimum power pool. Per NPS comments dated July 5, 2012; we encourage additional analyses that include possible severe future hydrologic conditions within the Colorado River watershed (extremely low inflow and low lake level conditions.) NPS Comment Disposition - The modeling, analysis, and discussion of the effects of the LPP withdrawals on LP elevations is incomplete. The current modeling effort only evaluated 3 years of LPP withdrawals with the 2007 Interim Guidelines in effect (modeled LPP depletions began in 2024, the 2007 Interim Guideline expire in 2026). LPP depletions 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, under the current operating regime (i.e., the 2007 Interim Guideline), was never modeled or analyzed. BOR report states that the effects of the LPP will be greatest at full build-out. Recent modeling by Colorado West Slope water users suggested that small differences in LPP elevations in critical years could cause (or increase the frequency ad duration) LP to fall below minimum power pool elevation because either the inflow hydrology coupled with the antecedent reservoir 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, a 1-2 foot drop in LP elevation associated with the LPP withdrawals (esp. at full buildout) could trigger a different Operating Tier under the Interim Guidelines, 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 at Upper Basin CRSPA reservoirs. [BOR held all demands (except reasonably foreseeable project) constant at 2015 levels in order to model just the effects of the LPP. If these (increasing) demands were included, the likelihood of LP falling below minimum power pool may be even greater, even without the LPP.]</p>	Please see the Extended Narrative document for the response to NPS Comment No. 114.	<p>The March 31, 2017 comment response resolves questions regarding the CRSS modeling assumptions on future depletions and 2007 Interim Guidelines operations.</p> <p>NPS asks for additional clarification on cumulative effects on upstream reservoirs under a 10 percentile scenario.</p> <p>NPS asks that the discussion on modeling uncertainties in the U.S. Bureau of Reclamation modeling attachment be included in the comment response.</p>	E. Janicki	Please see the revised attached Narrative Response document for the response to comment NPS No. 114.