

Comment #	Original Comment	Original UDWRe Response	BLM Comment Disposition	UDWRe Response
BLM 28	Planned and Potential Future Work – need to include supply projects in this NEPA document, but indicate if they have “independent utility” if the LPP were not to be built.	Planned and potential future work is discussed in Final Study Report 19 - Water Needs Assessment. Reuse of water from the proposed action would not be possible without the action and therefore does not have independent utility. Reuse of local water resources will occur with or without the proposed action and thus has independent utility. All other planned and potential future work is unconnected to the proposed action and has independent utility. Reports will be updated as necessary to clarify the independent utility of planned WCWCD and KCWCD water supply projects.	Comment not adequately addressed.	<p>Planned and potential future water supply projects that would have “independent utility” if the LPP were not to be built are identified in Sections 4.2 and 4.3 of Final Study Report 19 – Water Needs Assessment for WCWCD and KCWCD, respectively. This information is referenced in Section 5.3.2 of Chapter 5, Exhibit E as part of the License Application which replaces the PLP and was filed with FERC on May 2, 2016. Therefore the information is already included in the documents filed with FERC that will be used in the preparation of the DEIS. Please see the response and tables included in the Extended Narrative document for BLM Comment No. 28.</p> <p>A new second sentence is inserted into the second paragraph of Section 5.3.2.1.3, Chapter 5, Exhibit E of the License Application: Planned and potential future water supply projects would have independent utility from the LPP.</p>
BLM 432	2nd paragraph: It says “The Commission did not identify specific resources...” BLM is the authority on BLM-managed public lands, not FERC. BLM has a ROD that it will make its decision on public lands. Please correct this concept throughout the document.	Your comment is noted.	Comment not adequately addressed.	Please see the response to BLM Comment No. 432 in the attached Extended Narrative document.
BLM 565	General Comments: Use of acronyms - many of the acronyms used in this section have previously been defined, so don't need to redefine them here.	Acronyms that have previously been defined will not be redefined in this section of the text.	It does not appear as though this list of acronyms/use of acronyms was fully incorporated. For example, Line 1 of Sec. 5.3.2.1.1 (use of WCWCD).	<p>The first use of acronyms is corrected or explained. The first use of the acronym "WCWCD" in Chapter 5, Exhibit E of the License Application, occurs in Section 5.1.3, fourth paragraph, second sentence, which is revised to read: Water diverted from the Virgin River is conveyed to and stored in Sand Hollow Reservoir, an offstream storage facility constructed and operated by Washington County Water Conservancy District (WCWCD) to store water and to recharge the local Navajo sandstone aquifer.</p> <p>The first sentence in Section 5.3.2.1.1 Chapter 5, Exhibit E of the License Application is revised to read: The WCWCD water supplies come from a combination of groundwater (springs and wells) and surface water (direct diversions and reservoirs).</p> <p>The first use of the acronym "TDS" is in Section 5.1.7, Chapter 5, Exhibit E of the License Application on page 5-14.</p> <p>The first use of the acronym "EPA" is in Section 5.1.7, Chapter 5, Exhibit E of the License Application on page 5-14.</p> <p>The first use of the acronym "mgd" is in Section 5.3.2.1.5.1, Chapter 5, Exhibit E of the License Application on page 5-87.</p> <p>The first use of the acronym "KCWCD" is in Section 5.1.1, Chapter 5, Exhibit E of the License Application on page 5-1, second paragraph, last sentence and is revised to read: This section describes the watersheds and river basins crossed by the Water Intake System, Water Conveyance System, Hydro System, Kane County Water Conservancy District (KCWCD) System and Electrical Transmission System.</p> <p>The first sentence of Section 5.3.2.1.8 Chapter 5, Exhibit E of the License Application is revised to read: The KCWCD was formed in 1992.</p>

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BLM 567	Merge this section with Sec. 5.1.4 (which essentially has the same information), then just reference that section here ... no need to repeat all of this information when it already exists in a previous section of this document.	Section 5.3.1.1 of the PLP addresses the Affected Environment, where conditions and analysis are summarized, and Section 5.3.1.2 addresses Environmental Effects, including significance criteria and whether or not conditions meet those criteria. Section 5.3.1.2 does not present analytical methods. UDWR's view is that no revision to the text is needed.	This section (5.3.2.1.4) IS also an Affected Environment section – note the heading name for 5.3.2.1 – Affected Environment. Please incorporate the requested revision.	An explanation follows as to why the revision is not incorporated. The previous UDWR response to the original BLM comment contains incorrect section references. The information presented in Section 5.1.4 presents an overview of the LPP Area Dams and Reservoirs prepared to meet FERC requirements for an Exhibit E document per the ILP regulations at 18 CFR 5.18. The information presented in Section 5.3.2.1.4 is specific to WCWCD, contains additional information on LPP area dams and reservoirs and is part of the narrative development of the analysis of the water supply environmental resource.
BLM 568	1st line – Page 5-11 of this PLP lists the capacity of Kolob Reservoir as 6,914 ac-ft, which is in conflict with this number. Which is it? 2nd line - Page 5-11 states that Kolob Reservoir was completed in 1956 (whereas this states 1957) ... which is it? (Need to have consistent info.)	Kolob Reservoir has a capacity of 5,586 acre feet and was built in 1956. The text has been revised to reflect this.	Note: Contrary to UDWR's response, page 5-11 (Sec. 5.1.4) still states that the capacity of Kolob Reservoir is 6,914 ac-ft. Please correct that.	Change made. The information BLM commented on in the PLP is now contained in Section 5.3.2.1.4.2, Chapter 5, Exhibit E of the License Application. The correct Kolob Reservoir capacity (5,586 ac-ft) and the date it was built (1956) is corrected and made consistent in the License Application. The text Section 5.3.2.1.4.2, Chapter 5, Exhibit E of the License Application is revised to read: The maximum reservoir capacity is 5,586 ac-ft and it contains water flowing in from Kolob Creek, Crystal Creek, and many springs. Section 5.3.2.1.4.2, Chapter 5, Exhibit E of the license application is revised to reflect the correct date the Kolob Reservoir was built which is 1956.
BLM 569	Merge this section with Sec. 5.1.4 (which essentially has the same information), then just reference that section here ... no need to repeat all of this information when it already exists in a previous section of this document.	The document has been organized and written in accordance with FERC guidance.	It is unlikely that FERC dictates where a "culinary water" section should be, so please make the requested edit because it would make the document flow better.	FERC regulations are specific as to the contents of the various sections of Exhibit E, Chapter 5 and do not provide for the sections to be merged or referenced. Section 5.3.2.1.5, Chapter 5, Exhibit E of the License Application describes specific features of the Washington County Water Conservancy District culinary water systems, including the Quail Creek water treatment plant, local water production wells, regional pipelines, and retail water systems. Section 5.1.4, Chapter 5, Exhibit E of the License Application presents an overview of dams and reservoirs throughout the LPP area from Glen Canyon in Coconino County, Arizona to Washington County, Utah. The overview presented in Section 5.1.4 is required for Exhibit E of license applications in FERC's regulations at 18 CFR § 5.6(d)(2)(ii) and (iii)(A) and (B), and at 18 CFR § 5.18(b) and as such, merging the text in Section 5.3.2.1.5 into Section 5.1.4 would be contrary to FERC regulations. UDWR will support eliminating redundant information during preparation of the DEIS.
BLM 571	It is not "the Grand Staircase-Escalante National Monument" ... please delete "the". (It is not correct to use "the" when using a proper name.)	The suggested edit has been incorporated.	The entire sentence was deleted (not sure why). If the referenced agreement exists, please re-insert this sentence.	The sentence was removed from the License Application because there is no agreement between Kane County and WCWCD regarding groundwater development and removing water supplies from Grand Staircase-Escalante National Monument. All other occurrences of "the" prior to proper nouns such as Grand Staircase-Escalante National Monument, GSENM, Glen Canyon National Recreation Area, GCNRA, and other similar names are removed from the text of Chapter 5, Exhibit E of the License Application.
BLM 573	1st line of 2nd full paragraph on page: Insert "Creek" after "Kanab." 2nd line of 3rd full paragraph on page: This states that existing supply yields are expected to decline from 3% to 7.2% ... isn't that an increase rather than a decline?	The suggested edit from the first paragraph from the above comment has been incorporated. The range of decline is expected to be between 3% and 7.2%.	1st line of 2nd full paragraph on page: this edit is fine. This text is not clear. Rewrite to say "The range of decline in existing supply yields is expected to increase from 3% (in 2020) to 7.2% (in 2060).	Edits made. The first sentence in the fourth paragraph of Section 5.3.2.1.8, Chapter 5, Exhibit E of the License Application is revised to read: The Navajo sandstone aquifer is the primary water source for the Kanab Creek and Johnson Wash drainages. The second sentence in the fifth paragraph of Section 5.3.2.1.8, Chapter 5, Exhibit E of the License Application is revised to read: The range of decline in existing supply yields is expected to increase from 3 percent (in 2020) to 7.2 percent (in 2060) based on the statistical analysis of streamflow projections conducted by U.S. Bureau of Reclamation (Reclamation 2014).
BLM 576	6th line of 1st full paragraph on page: Please define the "gpcd" acronym (This is the first place in the PLP that this is used). 1st and 2nd lines of 2nd full paragraph on page: What is this projected population increase for Kanab and Johnson Canyon area based upon? Please provide documentation.	The text has been revised to address the comment.	6th line of 1st full paragraph on page: this edit is fine. What is "GOMB"? Need to add the cited study to the list of references.	GOMB is defined. The first sentence in the third paragraph of Section 5.3.2.2.1, Chapter 5, Exhibit E of the License Application is revised to read: Similarly, the population in the KCWCD service area (Kanab City and Johnson Canyon area) is projected by the Utah Governor's Office of Management and Budget (GOMB) to increase from 4,780 in 2010 to 12,480 in 2060. The list of references, Section 5.3.2.6, Chapter 5, Exhibit E of the License Application, is revised to include the following citation: Utah Governor's Office of Management and Budget (GOMB). 2012. Spreadsheet accessed under Detailed Demographic and Economic Projections page, 2012 Baseline Projections, Sub-County Population Projections page. http://gomb.utah.gov/budget-policy/demographic-economic-analysis/

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BLM 577	Keeps referring to Washington County population at 138k in 2010. Need to update that.	The 2010 figure is based on the U. S. census. UDWRe's view is that the text is appropriate as written.	Comment not adequately addressed. Please use updated population figures.	<p>Population figures are updated with 2015 census information. The following sentence is inserted after the first sentence in the second paragraph of Section 5.3.2.2.1, Chapter 5, Exhibit E of the License Application: The US Census Bureau estimated the population in 2015 to be approximately 155,602 which falls within the population projection range (Census 2016a).</p> <p>The following citation is added to Section 5.3.2.6, Chapter 5, Exhibit E of the License Application: US Census Bureau (Census). 2016a. QuickFacts. Available on line at http://www.census.gov/quickfacts/table/PST045215/49053</p> <p>The documents contain 2010 census values because the Utah Governor's Office of Management and Budget (GOMB) prepares the state's official population statistics and projections, which are required to be used by UDWRe and therefore are contained in the LPP Exhibit E submitted to FERC as part of the License Application. The 2017 current GOMB baseline population for Washington County cites the 2010 Census value of 138,115.</p>
BLM 578	Keeps referring to Kane County population using 2010 figures. Need to update that.	The 2010 figure is based on the U. S. census. UDWRe's view is that the text is appropriate as written.	Comment not adequately addressed. Please use updated population figures.	<p>Population figures are updated with 2015 Census information. The following sentence is inserted after the first sentence in the third paragraph in Section 5.3.2.2.1, Chapter 5, Exhibit E of the License Application: The US Census Bureau estimated the population in 2015 to be approximately 4,800 which falls within the population projection range (Census 2016b).</p> <p>The following citation was added to Section 5.3.2.6, Chapter 5, Exhibit E of the License Application: US Census Bureau (Census). 2016b. QuickFacts. Available on line at http://www.census.gov/quickfacts/table/PST045215/49025</p> <p>The documents contain 2010 census values because the Utah Governor's Office of Management and Budget (GOMB) prepares the state's official population statistics and projections, which are required to be used by UDWRe and therefore are contained in the LPP Exhibit E submitted to FERC as part of the License Application. The 2017 current GOMB baseline population for Kanab City cites the 2010 Census value of 4,312 and no Census value is provided for the Johnson Canyon area.</p>
BLM 583	Last sentence states that the No Lake Powell Water Alternative would have a separate set of cumulative effects ... what about the No Action Alternative? Need to address that alternative in this analysis also.	The text has been revised to address the comment.	Effects from No Action should be the same as effects from the No Lake Powell Water alternative. Neither would supply new water.	<p>For an explanation of the difference between the No Action and No Lake Powell Water Alternatives, and a partial response to BLM Comment No. 583, please refer to the response to BLM Comment No. 667 in the attached Extended Narrative document.</p> <p>The fourth sentence in the first paragraph in Section 5.3.2.4, Chapter 5, Exhibit E of the License Application is revised to read: There would be cumulative effects from the No Action Alternative because there would be long term adverse effects on the water supply. The reasonably foreseeable actions that would be undertaken by the water conservancy districts to provide potable water to serve their projected needs are those described in Chapter 3 of the License Application. The water supply measures to develop existing water supplies described for the WCWCD in Section 3.2.1 would meet projected water demand through approximately 2028. The water supply measures described for the KCWCD in Section 3.2.2 to develop existing water supplies would meet projected water demand through approximately 2033. Those measures would have a long term adverse impact on the Counties' water supplies. The existing and reasonably-foreseeable future water supply would be depleted under the No Action Alternative.</p> <p>The No Lake Powell Water Alternative is an action alternative with effects described in Section 5.3.2.2.4. Please refer to the response to BLM Comment No. 667 and the cumulative effects on water supply described in Section 5.3.2.4.2.</p>