

Comment #	Original Comment	UDWRe Response	resource
NPS Cmt 40	<p>Chapter 5, general comment: The NPS requests additional analysis in Chapter 5 in the areas of wildlife and special status animal species. The GLCA species list was previously supplied; the NPS requests additional information on wildlife and these additional topics, although the botany and special status plant species sections did not include this information.</p> <p>It is the responsibility of the Federal Energy Regulatory Commission (FERC) to consult on all listed/candidate species under ESA Section 7; there is no mention of this for the 2 plant species, one of which occurs in GLCA. Please include this information in the text.</p> <p>The NPS requests clarification regarding inconsistencies in the document on the amount of noise generated during operations, especially with respect to the pump stations. The NPS requests corrections to the data to enable an accurate impacts analysis on the soundscape on NPS lands.</p> <p>There is one trackway site directly adjacent to the location of the 1st pump station at the forebay location that needs to be considered and mitigated for the installation of the station. The NPS requests additional information relating to the track site and mitigation measures proposed for it.</p> <p>The NPS requests additional analysis and discussion about climate change, especially forecasts for potentially very low lake levels, and increased variability in storm events. Some studies have suggested that Lake Powell could reach "dead pool" in the next 20-30 years with global warming and related hydrology impacts. Also, the monitored storm events in the document may have been small or typical events, but there have been several major flooding events in recent years in the washes where the pipeline would cross--some of these events are likely to down cut more than the suggested depth of 5 feet or so for the pipe and casement. For example, a 2015 event down cut one of the washes at least 5-6 feet near Grenehaven along Highway 89. Update this section to include additional discussion about climate change and the associated impacts.</p>	<p>Please see the attached Extended Narrative document for the response to NPS Comment No. 40.</p>	veg
NPS Cmt 67	<p>The NPS requests additional analysis regarding effects to vegetation from clearing and grubbing. Vegetation, especially shrub-tree vegetation that is "cleared and grubbed" will not recover quickly - most desert shrub/tree species are very slow growing. A 25 foot juniper can be 500 or more years old. A 3 foot blackbrush could be 200 years old. These assertions that impacts are short-term are not correct and are directly refuted by observational data. They are long-lasting and for species like blackbrush are essentially permanent.</p>	<p>The text has been revised to address the comment.</p> <p>The second paragraph in Section 5.3.8.2.1, Chapter 5, Exhibit E of the License Application is revised to read: The direct effects on vegetation would consist of clearing and grubbing plants within the pipeline, penstock, pump stations, and hydro stations ROW, and clearing and grubbing vegetation from transmission line tower bases, substations, switch stations, and staging areas. Shrub and herbaceous vegetation would not be cleared and grubbed from the ROW under the transmission lines. Trees would be cleared from the power transmission line ROW where they would conflict with power transmission lines. Effects from tree and shrub removal from the ROW would be long-term because trees and shrubs such as juniper and blackbrush can live to be hundreds of years old. Construction staging areas would be restored and revegetated and would regain some of their habitat values within two or three growing seasons. Plants removed to construct LPP features such as pump stations, hydro stations, regulating tank, reservoirs, substations, and switchyards would be long-term adverse effects on vegetation communities.</p>	veg

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NPS Cmt 68	<p>The NPS requests additional analysis and discussion on the propagation of endemic species as very few "endemic" species have been propagated and there is very little knowledge on seedign rates and production for most of these species.</p> <p>The NPS requests clarification on this section for the following reason: 1) Most of the dominant species that would be used in re-seeding are not endemic to other regions - shadescare, sagebrush, four-wing, ricegrass, etc., are widespread species in the west. Please update section to include endemic species to be used in seeding efforts, especially on NPS lands to demonstrate how they meet NPS Management Policies.</p>	<p>Reference to "endemic native plant species" in Section 5.3.8.3.1 of the PLP is not included in Section 5.3.8.3.1 of the License Application which has replaced the PLP in the FERC licensing process. The License Application in this section refers to "an approved seed mix". The text in Section 5.3.8.3.1 was edited during preparation of Chapter 5, Exhibit E of the License Application to replace the phrase "endemic native plant species" with "an approved seed mix." Therefore, the first and second sentences in the first paragraph in Section 5.3.8.3.1, Chapter 5, of the License Application are revised to read: The ROW cleared and grubbed during construction would be re-vegetated with an approved seed mix applied to prepared soils, along with seedling replacement. The seed mix would be submitted to NPS for approval in revegetating the sandy soils that would be disturbed by LPP construction.</p>	veg
NPS Cmt 69	<p>For some Colorado Plateau vegetation the effects would be long-term and adverse, especially for blackbrush vegetation along the proposed route (reasons previously stated in Comment 68). Please update the text to reflect this.</p>	<p>The text is updated regarding the long-term effects on blackbrush. A sentence is added after the first sentence of Section 5.3.8.5.1, Chapter 5, Exhibit E of the License Application and is shown below: The Proposed Action would have long-term unavoidable adverse effects on blackbrush vegetation communities during and following construction.</p>	veg
NPS Cmt 74	<p>Table 106-Schismus arabicus/barbatus is common in the GLCA stretch along Highway 89. Please update the text to reflect this.</p>	<p>The text is updated to reflect the presence of Schismus arabicus/barbatus along Highway 89 in GLCA.</p> <p>The following sentence is added to the first paragraph in Section 5.3.10.1.3, Chapter 5, Exhibit E of the License Application: NPS has identified the common occurrence of Schismus arabicus/barbatus along Highway 89 in GLCA.</p>	veg
NPS Cmt 75	<p>Eriogonum corymbosum var. nilesii is a candidate species - this suggests that Federal Energy Regulatory Commission (FERC) or UDWR will have to consult with the United States Fish and Wildlife Service through Section 7 on NPS lands and where federal funding is included. The NPS requests additional analysis as it relates to this candidate species.</p>	<p>UDWR researched the most current USFWS candidate species list on the USFWS website (https://www.fws.gov/endangered/what-we-do/cnor.html) and the Nevada Buckwheat is not listed as a candidate species. As a result, consultation with USFWS is not necessary for this species. Please see the attached PDF file for the September 24, 2014 Federal Register Notice on USFWS' determination to not list <i>Eriogonum corybosum</i> var. <i>nilesii</i> (Las Vegas buckwheat).</p>	veg
NPS Cmt 76	<p>Please indicate when the surveys were conducted to ensure the data is recent enough to provide meaningful analysis.</p>	<p>The calendar years in which the surveys were conducted are added.</p> <p>Table 5-94 of the PLP is now Table 5-88 in the License Application. The following sentence is added to the end of the first paragraph in Section 5.3.10.1.1 Special Status Species Overview, Chapter 5, Exhibit E of the license Application: Field surveys were conducted in 2009 and 2010.</p>	veg