Washington County is one of the fastest growing and driest regions in the nation. The county's residents are dependent on a single water source of variable quantity and quality — the Virgin River basin. Another water source, such as the Lake Powell Pipeline (LPP), will be needed to meet the demands of a population expected to nearly triple in the next 45 years.

The Virgin River basin has served the area well, but increased demand, contaminants, infrastructure damage, floods, wildfires and drought all pose a risk to a single-source system. The county has encountered drought 12 out of 20 years.

The LPP introduces a second critical, reliable source of water to the county — the Colorado River. The river has always provided enough water to meet established uses and compact requirements. The state of Utah is working closely with federal agencies and other basin states to plan for future needs and mitigate potential impacts of climate change. The drought contingency plans are a good step in that direction.

Even though Utah may be developing its water rights later than some of the other basin states, it does not mean there will not be enough water for projects like the LPP. It's time for Utah to use the water it is entitled to and build this critical project.

Please complete the Environmental Impact Statement and issue a Record of Decision that names the Southern Alternative as the Preferred Alternative.

Sincerely,

Aaron Olsen
theolsenfamily@gmail.com
84790
Dear Bureau of Reclamation,

I'm writing to urge you to reject the Utah Division of Water Resources' proposed Lake Powell Pipeline. The project is unnecessary, expensive and would seriously damage the region's lands, water, wildlife and downstream communities.

It's a terrible idea and should be denied for several reasons:

1) The pipeline would slice through irreplaceable public lands that are home to unique plants and animals and visited by millions of tourists each year. The agency's preferred route — known as the "Southern Alternative" — would fragment the Kanab Creek area of critical environmental concern. This area supports potential habitat for endangered southwestern willow flycatchers and protects rare plants and important cultural resources.

2) Flooding Washington County with more water will induce more unsustainable growth. Such development would further fragment habitat for threatened Mojave desert tortoises, as well as many other imperiled plants and animals that inhabit this unique area.

3) Utah has failed to account for the current and predicted impacts that global climate change is having on the region's rivers. The withdrawal of water for the Lake Powell Pipeline would represent a new, ill-defined use of water from the Colorado River, which is already over-allocated.

4) Flows in the Colorado River basin are already severely diminished and modified, threatening the basin's four endangered native fish. By changing the place of diversion, the Lake Powell Pipeline would change the flow regimes of the Green and Colorado rivers, putting these imperiled species at even higher risk of extinction.

5) The water needs of communities in Washington County can be met with existing water supplies by implementing inexpensive, proven water-conservation
measures. Cities across the Southwest and around the country already use such measures successfully.

For all these reasons, I urge you to reject the Lake Powell Pipeline and the damage it would inflict. Removing water from the river for this project is unnecessary and would take away water that's needed by wildlife and millions of people who live downstream.

Sincerely,
Julian Gonzalez
Pleasant Grove, UT 84062
10697479@my.uvu.edu
Dear Provo Area Office United States Bureau of Reclamation,

CC: U.S. House of Representatives, U.S. Senate

To the Bureau of Reclamation,

I am writing today to provide comment on the draft Environmental Impact Statement for the Lake Powell Pipeline proposal. I will be sending this letter to the Bureau of Reclamation, as well as to my congressional representatives.

As the proposed pipeline project would entail a transfer of water from the Upper Colorado River Basin to the Lower Colorado River Basin, federal law requires congressional approval. I urge you to help ensure that this important oversight happens.

Not only would the project be enormously expensive, it poses an unnecessary risk to native communities along the proposed pipeline route, our public lands, and the health of the entire Colorado River.

Currently, the proposed routes for the Lake Powell Pipeline would pass through lands that are culturally significant or sacred to the Kaibab Band of Paiute Indians, potentially disturbing or impeding access to these areas.

Further, the Colorado River is an overstressed and shared resource, and given the predictions that the river will continue to be over-allocated and stressed by increasingly dry conditions, we can’t afford to unnecessary water diversions that increase the risk of shortage to millions of other water users.

Analysis has shown that Utah can ensure the community has the water it needs and save its taxpayers’ money without posing an unnecessary risk to communities, our public lands and the health of the Colorado River through water conservation, water reuse, and agricultural water transfers. These local water supply solutions offer the best opportunity to ensure a sustainable water supply for Utah’s Washington County.

The federal government must consider these alternatives in the project’s Environmental Impact Statement, and, ultimately, the decision on the project’s approval.
Thank you.

Sincerely,
Marilynn Baldwin
109 Beards Hill Rd  Aberdeen, MD 21001-1923
baldwinmp42@gmail.com
Washington County, Utah is one of the nation's fastest growing populations and is projected to nearly triple in the next 45 years. The county is also one of the driest regions in the nation, currently dependent on a single water source of variable quantity and quality — the Virgin River basin, which is reaching its full development potential. The county's growth and limited water resources make the Lake Powell Pipeline (LPP) essential for southern Utah's future population and economy.

Based on conservative water use estimates, the LPP is projected to support an additional $11 billion in gross domestic product, 120,000 jobs and nearly $4.5 billion in total wages and salaries. In addition, the project is anticipated to generate an incremental $20 billion in sales tax and state income tax revenues through 2060.

There isn't another potential water project that would diversify and more than double Washington County's water resources and economic portfolio.

Utah has one of the strongest economies in the nation. It's important we plan today to ensure our future population and economy is not put in jeopardy due to water supply scarcity in the future.

We appreciate the Bureau of Reclamation's consideration of this essential water project and request the LPP move forward to protect our region's quality of life and economic stability by selecting the Southern Alternative as the Preferred Alternative in the Record of Decision.

Sincerely,

Dennis Lamb
dcordero54@msn.com
84790
From: BARBARA WISE <wise4755@msn.com>
Sent: Wednesday, July 15, 2020 1:53 PM
To: Crookston, Peter L; Baxter, Rick J; LPP, BOR-sha-PRO
Subject: [EXTERNAL] I Demand a Conservation Alternative be a part of the Lake Powell Pipeline DEIS

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Water Conservation should be considered a viable Alternative, despite WCWD’s unfounded claims that they “need” a secondary source of water, and must be included in the Environmental Impact Statement for detailed study. Conservation is in the public’s best interest, especially for the working families and residents of Washington County. This EIS is not adequate or thorough until a conservation alternative has been studied and put forward.

Barbara
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Dear Bureau of Reclamation,

I’m writing to voice my opposition against the Draft EIS for the Lake Powell Pipeline project, which contains serious flaws. It completely ignores the importance of water conservation, ignores the impact of climate change on the Colorado River, and was written with a clear leaning toward new water development. As it is now written, the alternatives in this EIS would cause harm to everyone who lives in the Colorado River Basin, and the ecosystem that depends on its flows.

One of the main flaws with the EIS is that the purpose and need statement disallows any study of a water conservation alternative. The statement reads that “The purpose of the Proposed Project is to deliver a reliable annual yield of approximately 86,000 acre-feet of water per year from outside the Virgin River Basin into Washington County to meet projected water demands in 2060.” This statement was clearly written with a bias toward the interests who have been pursuing the pipeline and not toward the public interest. A purpose and need statement like this is fatally flawed and prevents the BOR from being able to “rigorously explore and objectively evaluate all reasonable alternatives”, a key provision of NEPA.

Since the purpose and need requires a new water source of a very specific amount from outside Washington County, the alternatives of 1) building a pipeline through the northern route, 2) building a pipeline through the southern route, and 3) building no pipeline leave no option to pursue comprehensive water conservation that could allow Washington county to meet future water needs with water efficiency like nearby counties have done.

By omitting any thorough evaluation of a water conservation alternative, the EIS is promoting further water waste in Washington County, at great cost to its citizens and in spite of those of us who take steps to reduce our own personal use. The omission of studying water conservation is egregious, given that Washington County currently uses 302 gpcd of water, with the paltry goal of reducing that consumption to 240 gpcd in 25 years. In comparison, Phoenix currently uses 111 gpcd. Some form of a water conservation is clearly a reasonable alternative and deserves to be objectively evaluated.

The EIS cites climate change research to project reduced flows from the Virgin River, Washington County’s current water source, but doesn’t acknowledge the same studies’ findings on the impact to the proposed future source, the Colorado River. One study cited in the EIS, by Udall and Overpeck, concludes that the Colorado River will likely see a 30% reduction of flows by 2060, which would jeopardize Utah’s ability to draw water from a new diversion. This EIS does not adequately assess these climate impacts and the subsequent changes in operations at Lakes Powell and Mead, which could
prevent the pipeline from drawing any water.<br/>Until these serious flaws in the EIS have been addressed, and a conservation alternative is given rigorous exploration and objective evaluation, this EIS fails to uphold the provisions of the NEPA process and protect the interest of the public and the environment.

Thank you

Ashlie Gilbert
From: Kevin West <zennisplayer@gmail.com>
Sent: Thursday, June 18, 2020 9:48 PM
To: LPP, BOR-sha-PRO
Subject: [EXTERNAL] Lake Powell Pipeline Project Draft EIS Public Comment

I opposed this costly and wasteful project, as it would further stress an already-depleted Colorado River. Washington County is one of the most wasteful counties in the country, using almost THREE TIMES the water that Phoenix uses. At a time when many states in the Colorado River Basin are working to reduce their dependence on the river, Utah is actually working to increase its dependence on the system.

Thank you,

Kevin West
Dear Mr. Rick Baxter:

I am writing to urge you to cancel the Lake Powell Pipeline Project. There is simply not enough water available in the Colorado River Basin to support an additional 28 billion gallons of withdrawal in Utah. Committing that water to sprawl and development in Utah further drains and destroys the Colorado River and negatively impacts its ecological health.

Other states are already having to cut use of the river owing to climate-driven flow declines. Those declines — and their associated water shortages — are forecast to worsen in the future with regional drying and climate disruption. Prudent policy today affords flexibility in future water management. In this case, that means keeping those 28 billion gallons available for downstream ecosystems and endangered species, including in the Grand Canyon.

The EIS should evaluate all plan alternatives against worst-case scenarios for future water availability across 10, 20, 50 and 100 year timelines. It should evaluate alternatives across a range of impacts, especially their ability to provide adequate water for downstream states, municipalities, ecosystems—including national wildlife refuges and critical habitats—and endangered species. The analysis should be based on the best available science and climate models.

Further, if Utah wants to be obsessed with fueling population growth, it will have to prioritize water conservation, not river destruction. I will oppose this project through the entire permitting process and I will support groups, like Save The Colorado, that will fight in court.

Thank you for your consideration.

Nancy O
From: WildEarth Guardians <action@wildearthguardians.org> on behalf of Steve Aydelott <action@wildearthguardians.org>

Sent: Thursday, September 3, 2020 10:58 PM

To: LPP, BOR-sha-PRO

Subject: [EXTERNAL] Comment on the Lake Powell Pipeline Draft EIS and Plan Amendment

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Sep 3, 2020

U.S. Bureau of Reclamation

Dear Reclamation,

I write to comment on the Lake Powell Pipeline Project Draft Environmental Impact Statement ("DEIS") and Draft Arizona Strip Field Office Resource Management Plan Amendment ("RMPA" or "Plan Amendment").

I oppose the Lake Powell Pipeline Project, including both the Southern Alternative (preferred alternative) and the Highway Alternative, and believe that the best path forward is to choose the No Action Alternative.

Not only is the water diversion and pipeline project unnecessary, but it is being used to fuel unsustainable and wasteful growth in Washington County, Utah at the expense of the remaining 40 million people, recreational and agricultural economies, tribal lands and cultures, and the environment in the Colorado River Basin. For example, Washington County residents use an average of 302 gallons of water per person per day, which is more than twice that of Denver residents (142 gallons) and three times more than residents of Phoenix (111 gallons).

Other cost-effective and less destructive alternatives exist to the Lake Powell Pipeline. In fact, water conservation could reduce residents demands by half and other local water supplies could satisfy the articulated demand. These conservation mechanisms have been detailed in many of the public comments in this and prior iterations of this project before the Federal Energy Regulatory Commission, including the "Local Water Alternative" proposed by Western Resource Advocates that relies on "water conservation, water reuse, and agricultural water transfers" to satisfy demand.
The Colorado River is already over-allocated and there is no water remaining in the system to fulfill undeveloped entitlements like the Lake Powell Pipeline. The Colorado River Compact allocations were based on an unusually wet period of record and grossly overestimated the amount of water available in the Colorado River to allocate between the basin states. As a result of this overallocation, the demand in the basin exceeds supply and there is no water available for additional development without significant consequences for existing users and the environment. In addition, the warming and drying climate that has already decreased flows in the Colorado River from 2000 to 2014 by 19 percent is predicted by climate scientists to reduce flows by another 20 to 40 percent by the end of the century. Therefore, even if supplies were once sufficient to meet demand, the inflows to the Colorado River are dwindling and not likely capable of meeting additional future demands like the Lake Powell Pipeline. Further, any new demand would also accelerate the loss of storage in Lake Powell and Lake Mead, leading to the loss of hydropower generation at one or both reservoirs. It is clearly a basin-wide concern considering the efforts made by the basin states to begin developing drought contingency plans to reduce the risk of water shortages and falling reservoir levels in the basin.

The removal of an additional 86,000 acre-feet, or 28 billion gallons, of water per year from Lake Powell and the construction of a 140-mile pipeline will have devastating consequences to communities and the environment. Flows in the Grand Canyon will decrease impacting recreation, downstream communities and cultures, ecosystem health, and endangered species of fish and wildlife, among other consequences. In addition, piping water from Lake Powell, which is infested with invasive quagga mussels (that disrupt food webs, clog water intake structures, and serve as a recreational hazard), would also infect sensitive habitats in the Virgin, Kanab, and Paria Rivers. Finally, the water diversion and the pipeline construction would further diminish riparian habitat critical for the endangered Southwestern willow flycatcher and threatened yellow-billed cuckoo, and flows needed for the endangered humpback chub, razorback sucker, bonytail, and Colorado pikeminnow. The project would also harm California condors, Mexican spotted owl, and the Mojave desert tortoise. In addition, the pipeline would cross and harm sensitive habitat, species, cultures, and communities in the Kanab Creek Area of Critical Environmental Concern, the Cockscomb Wilderness Study Area, the Paria River, the Old Spanish National Historic Trial, Pipe Spring National Monument, tribal lands, and several environmental justice communities.

For the aforementioned reasons, the risk is too great and the preferred project alternatives are not necessary to satisfy the actual water need of the region. I am deeply concerned that the environmental, cultural,
and community consequences of this action cannot be adequately mitigated and that the cost socially and environmentally is too high. I ask that you select the No Action Alternative and that a more environmentally sound and feasible project be developed or that the Local Waters Alternative is reconsidered under the circumstances.

Thank you for your consideration.

Sincerely,

Steve Aydelott
20770 Gallop Road
Bend, OR 97701
staydelott@hotmail.com
Extensive environmental studies have been conducted for the Environmental Impact Statement (EIS) for the Lake Powell Pipeline (LPP) to evaluate impacts from the construction, operation and maintenance of the project. The studies have found that the LPP will have very few permanent environmental impacts. The studies also identify mitigation measures designed to protect wildlife, fish and riparian habitat, plants, cultural and paleontological resources.

The pipeline route mostly follows existing roads, alignments or designated utility corridors and will be buried to minimize disturbances to natural, cultural, historic and archeological resources.

The project would not have significant impacts on wildlife or listed fish species. LPP would have limited impacts on stream and river flows and water quality. It's important to note that LPP will not impact wetlands and would permanently impact less than 0.1 acres of water of the U.S.

The benefits of the LPP far outweigh any issues as it relates to the environment. With approximately eight inches of rain per year and a single water source, Washington County is the driest region in Utah and one of the fastest growing regions in the nation. Alternatives to the LPP would have more severe impacts to the environment.

I urge the Bureau of Reclamation to complete the EIS and issue a Record of Decision for the LPP Southern Alternative with appropriate mitigation measures to protect the environment.

Sincerely,

Nanette Glauser
nanglauser@gmail.com
84765
At this time, the only alternative I support for the Lake Powell Pipeline is the "no action" alternative. As presented, this project poses a threat to the Colorado River and the people and wildlife that rely on it. We must find solutions to our water demands that work for both people and nature. The environmental analysis for the Pipeline fails to document the complete range of impacts expected with development of the proposed project. The U.S. Bureau of Reclamation has a responsibility—not presently met in the draft Environmental Impact Statement (DEIS)—to provide a full analysis and accounting for all impacts of the proposed Lake Powell Pipeline. The DEIS is based on an incomplete hydrologic assessment, does not adequately address the water conservation alternative, fails to fully consider senior Tribal water rights, and does not take into consideration the unresolved legal implications of inter-basin transfers. Water demands exceed supply in the Colorado River Basin, and climate change is further exacerbating this supply-demand imbalance. An additional depletion of more than 80,000 acre-feet annually through the proposed Lake Powell Pipeline will increase the magnitude of each of these impacts. The Bureau of Reclamation should follow past successes by working with the seven Colorado River Basin states, Mexico, and water providers and users throughout the Basin to find solutions that work for both people and nature. The Bureau of Reclamation should not issue a Record of Decision for the Lake Powell Pipeline until the seven Colorado River Basin States reach consensus on the nature of any required legislation to permit the Pipeline's inter-basin water transfer. At this time, the only supportable alternative is the 'no action' alternative for the Lake Powell Pipeline.