

**Lake Powell Pipeline Project  
FERC Request for Clarification Schedule A – Item 4**

**Exhibit E**

*Terrestrial Resources*

- 4. In section 3.1.3.2.8, you state that all cacti and yucca within the right-of way (ROW) that would be disturbed in the Mojave Desert habitat portion of the proposed project *potentially* (emphasis added) would be salvaged and you note criteria where salvage would not occur. The section also states that in some areas additional shrub salvage or enhanced seed application would *potentially* be conducted to enhance restoration efforts. To help us understand your proposed protection measures, please clarify the conditions under which additional shrub salvage and enhanced seed application would occur and indicate what other conditions would prevent salvage in addition to the seven bullet criteria presented in this section.**

**UBWR Response:**

The second paragraph of Section 3.1.3.2.8 is specific to cacti and yucca occurring within the ROW that would be disturbed in the Mojave Desert habitat portion of the LPP project, including the seven listed bullets. The third paragraph of Section 3.1.3.2.8 is specific to “the portion of the ROW located within special designation areas (e.g., critical habitat, areas of critical environmental concern (ACEC)) identified in BLM Resource Management Plans (RMPs)...” None of the BLM special designation areas (e.g., critical habitat, ACEC) occur within the LPP project ROW that would be disturbed in Mojave Desert habitat. The Mojave Desert portion of the LPP project extends from the bottom of the Hurricane Cliffs to Sand Hollow Reservoir and along the association transmission lines below the bottom of the Hurricane Cliffs. Mojave Desert habitat is extremely difficult to revegetate with native and other non-irrigated vegetation species following land disturbance activities.

The only BLM special designation area within the LPP project ROW that would be disturbed is within Colorado Plateau habitat and occurs only in the Kanab Creek ACEC administered by the Arizona Strip Field Office. Additional shrub salvage from within the disturbed portion of ROW and enhanced seed application would occur under the following conditions in the Kanab Creek ACEC:

- Native riparian shrub species growing along Kanab Creek and Bitter Seeps Wash including *Salix exigua* and specimens of *Populus fremontii* and *Fraxinus velutina* under 10 feet tall would be excavated along with roots and transplanted into adjacent riparian habitat within the ROW; upon completion of penstock construction, transplanted *Salix exigua* plants could be re-transplanted into restored riparian portions of the ROW.
- Viable seed from native upland shrubs to be removed and those adjacent to the disturbed ROW would be collected and planted into restored soils within the ROW where the same species of native shrubs were removed during clearing and grubbing.

The following other conditions would prevent shrub salvage and transplanting within the LPP project ROW in the Kanab Creek ACEC:

- Riparian species including *Populus fremontii* and *Fraxinus velutina* ten feet and taller could not be safely excavated and transplanted
- Upland shrub species growing on steep slopes within the ROW
- Upland shrub species growing in areas where bedrock is within six inches of the ground surface within the ROW
- Upland shrub species growing in very rocky areas within the ROW