



— BUREAU OF —
RECLAMATION

Lake Powell Pipeline Project

The Project Proponent's Comments
on the Administrative Draft
Environmental Impact Statement and
the Bureau of Reclamation's Official Response

Background

The Bureau of Reclamation (Reclamation), as the lead federal agency for National Environmental Policy Act compliance on the Lake Powell Pipeline Project, provided the Utah Board of Water Resources (Project Proponent) and the Washington County Water Conservancy District (Project Participant) with an opportunity to comment on the Administrative Draft Environmental Impact Statement (ADEIS) prior to the public release of the Draft Environmental Impact Statement on June 5, 2020. In an effort by Reclamation to remain transparent, this document contains the comments submitted to Reclamation by the Project Proponent and Project Participant on April 26, 2020 on the ADEIS and Reclamation's official responses to their comments.

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
1	Exec Summary			1	5	It seems there are 5 agencies, but you stated 4 cooperating agencies	Change made
2	Exec Summary		ES-1	1	19	The description of Water Rights is inaccurate. First sentence should be revised to read: USBR holds Water Right No. 41-2963. UBWR holds Water Right No. 41-3479 which was segregated from 41-2963, and allows 447,500 acre-feet of water to be diverted. UBRW segregated Water Right No. 41-2963 in various ways, but retained . . .	Change made
3	Exec Summary		ES-1	1	19	Water Right No. 41-2963 for 3,960,000 AF in the Green River is held by Reclamation and from which 41-3479 was segregated and assigned to UBWR in 1996. UBWR has never held WR 41-2963. The water actually retained by UBWR from WR 41-3479 for the LPP is 83,756 AF, as reflected in UBWR's change application filed with the Utah Division of Water Rights on April 13, 2020.	Change made
4	Exec Summary		Dear reader letter p. 5	5	15	This uses the term "Tribes". But p.1 of the Dear Reader letter defines "Tribe" as the Kaibab. This is a global comment to address the use of Tribe and Tribes.	Change made
5	Chapter 1	Purpose and Need	1.1	6	10	Water Right No. 41-2963 is owned by USBR, not UBWR. The right appears to be for 3,960,000 AF of storage, and 500,000 AF has been segregated off, which includes the 447,500 AF for UBWR segregated as Water Right No. 41-3479.	Change made
6	Chapter 1	Purpose and Need	1.1	6	Line 13	Utah's Colorado River apportionment is derived from both the 1922 Colorado River Compact and, more specifically, the 1948 Upper Colorado River Basin Compact.	Change made
7	Chapter 1	Purpose and Need	1.1	6	Lines 10-12	Water Right No. 41-2963 for 3,960,000 AF in the Green River is held by Reclamation and from which 41-3479 was segregated and assigned to UBWR in 1996. UBWR has never held WR 41-2963. The water actually retained by UBWR from WR 41-3479 for the LPP is 83,756 AF, as reflected in UBWR's change application filed with the Utah Division of Water Rights on April 13, 2020.	Change made
8	Chapter 1	Purpose and Need	1.2	8	7	"Cooler, Wetter" should be "Warmer, Wetter"	Change made
9	Chapter 1	Purpose and Need	1.2	8	27	Why do you need two references for our mission statement, it hasn't changed	One came from the Board and one is more specific to UDWRe....both were sent to us by the proponent
10	Chapter 1	Purpose and Need	1.2	8	3-4	Add a sentence or two on past/ongoing conservation efforts and new conservation goals as integral part of future supply plan. Summarize what's discussed in Appendix G regarding WCWCD conservation.	Change made
11	Chapter 1	Purpose and Need	1.2	8	Table 1.2-1	Listed supplies include municipal resources; revise to read "Washington County Reliable Annual Water Supply"	No change made
12	Chapter 2	Alternatives	2.1.1	11	25	Should be National Environmental Policy Act - not National Historic Preservation Act	Change made
13	Chapter 2	Alternatives	2.1.2	12	14	What is the legal basis for the definition of economic feasibility for a project without federal funding?	There is no legal definition of economic feasibility.
14	Chapter 2	Alternatives	2.1.3.1	12	32	Define "residential outdoor culinary water use".	No need to define, self-explanatory
15	Chapter 2	Alternatives	2.1.3.1	12	37	Change sentence to "..., WCWCD and other municipal water providers would implement..."	Change made
16	Chapter 2	Alternatives	2.1.3.1	13	5	Change sentence to "...help meet increasing indoor potable water demands starting approximately 2030."	Change made
17	Chapter 2	Alternatives	2.1.3.1	14	11	The description of the Local Waters Alternative should include a statement that the alternative does not provide a supply reserve or buffer in the event that demand projects or other assumptions are wrong.	Modification to include said language
18	Chapter 2	Alternatives	2.1.3.1	14	14	The Local Waters Alternative does not propose complete elimination of residential outdoor use, just near-elimination. Suggest "near elimination" or "elimination of most".	Change made
19	Chapter 2	Alternatives	2.3.2.2	19	43	Ozone is currently not a proposed treatment method.	Reference to ozone removed

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
20	Chapter 2	Alternatives	2.3.2.6	20	44	Change to "...from the upgraded Paria Substation"	Change made
21	Chapter 2	Alternatives	2.3.2.7	21	28	Change sentence to "Short permanent ingress/egress roads off of existing roads and highways would be built for each aboveground pumpstation, regulation tank, and HS."	Change made
22	Chapter 2	Alternatives	2.3.2.7	21	31	Change sentence to "Multiple short, two-track spurs would be needed..."	Change made
23	Chapter 2	Alternatives	2.3.2.7	21	32	At the end of the paragraph, add this sentence from the POD: "Access controls, such as fences or gates, will be coordinated with applicable landowners and agencies during final design."	Change made
24	Chapter 2	Alternatives	2.3.2.13	23		The canyon wall issue is never mentioned in RMPA section. Should Chapter 1 or Chapter 2 explain the need for the RMPA and why LPP has chosen to go outside of the current utility corridor at Kanab Creek Canyon.	Change made. Paragraph added to provide context
25	Chapter 3		Intro paragraph	29	11	The analyses relied on information developed subsequent to the FERC process in response to Reclamation/E&E requests, so this sentence is not correct.	Statement in DEIS is correct
26	Chapter 3	Geology and Soils	3.2.2.2	31	38 to 40	Include a sentence summarizing the gypsum formation data and correlation to biological soil crusts for the Southern Alternative discussed in Comment #192.	Change made
27	Chapter 3	Geology and Soils	3.2.2.1	32	38 to 40	The intake pump station is proposed as part of the LPP and cannot be considered an interrelated action resulting in cumulative effects. Short-term dewatering at the intake pump station site could have unmeasurable cumulative effects on Glen Canyon flow levels and Lake Powell levels when combined with other actions affecting Glen Canyon Dam discharges and Lake Powell levels.	Change made
28	Chapter 3	Geology and Soils	3.2.2.3	33	13	Any use of commercial quarries would assume use of permitted quarries. We are not assuming development of project-specific borrow areas that would have new land impacts.	Language modified to reflect no additional effects to commercial quarries.
29	Chapter 3	Geology and Soils	3.2.2.4	33	38	Change word "much" to "some". Prior sentence states that much of the two routes are the same.	No change needed
30	Chapter 3	Geology and Soils	3.2.2.4	33	26 to 29	The sentence is factually incorrect. Both alternatives would disturb soils that are currently undisturbed. The Highway Alternative alignment would disturb mostly deeper soils (greater than 15 feet deep) and 0.76 mile of exposed bedrock or covered with a thin soil mantle (less than 1 to 2 inches deep). The Southern Alternative would disturb 24.6 miles of exposed bedrock or covered with a thin soil mantle (less than 1 to 2 inches deep). The steep sides of Kanab Creek Canyon result from the bedrock, mostly exposed, and the existing thin soil mantle (where it occurs over the bedrock) would be removed during bedrock excavation to install the pipeline. The risk of soil loss would occur from soil placed in the steep ROW during site restoration to aid in revegetation. Soil loss on the Kanab Creek Canyon slopes likely would be proportional to the quantity of soil applied for ROW restoration to achieve revegetation goals.	No change needed
31	Chapter 3	Geology and Soils	3.2.2.4	33	26 to 33	This section should state the comparative difference in soil derived from gypsum rock formations with correlation to biological soil crusts between the Southern Alternative and Highway Alternative (see Comment #192).	Change made
32	Chapter 3	Geology and Soils	3.2.2.4	33	31, 35	The Comparative Analysis describes effects as "moderate" but the summary header at p 31, section 3.2.2.2 describes "minor" effects, as does Table ES-5-1 on p 5.	Section modified for consistency
33	Chapter 3	Geology and Soils	3.2.2.4	33	35 to 45	This section should state the comparative difference in soil derived from gypsum rock formations with correlation to biological soil crusts between the Highway Alternative and Southern Alternative (see Comment #192).	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
34	Chapter 3	Geology and Soils	3.2.2.3	33	7 to 9	This sentence incorrectly states the facts of potential biological soil crust impacts from the Highway Alternative compared to those from the Southern Alternative. The Highway Alternative would disturb more than twice the area of geologic formations containing gypsum and correlated with biological soil crusts compared to the Southern Alternative (see Comment #192.). The 8-Mile Gap access road for the Southern Alternative would not affect any of the geologic formations containing gypsum and correlated with biological soil crusts. The part of the sentence regarding increased soil erosion potential should be separated from the part of the sentence referring to biological soil crusts. Implementing the non-structural and structural erosion and sediment control measures stated in Appendix H-1, Geology and Soils, Section 2.2.2 Mitigation Measures on the 8-Mile Gap access road would render the difference in erosion and sediment impacts between the Highway Alternative and Southern Alternative to be de minimis.	Change made
35	Chapter 3	Noise and Vibration	3.3.2.1	35	6	This paragraph has formatting/editing issues.	Editor fixed formatting issue
36	Chapter 3	Noise and Vibration	3.3.2.2	35	13	The comparison section states that wildlife impacts would be minor.	No change needed
37	Chapter 3	Noise and Vibration	3.3.2.2	35	36	Needs a verb so we know what the blasting would likely do : "Noise from underground blasting would likely _____ in a shorter distance than other types of construction noise"	Change made
38	Chapter 3	Noise and Vibration	3.3.2.3	36	16	The comparison section states that wildlife impacts would be minor.	No change needed
39	Chapter 3	Noise and Vibration	3.3.2.3	36	27	Construction would not occur in Pipe Spring National Monument.	Change made
40	Chapter 3	Climate Change	3.4.2.1	38-39		Clarify what "normal operating range" means. Elevations are provided but additional clarification is needed to explain what those elevations mean.	Elevations define the range
41	Chapter 3	Climate Change	3.4.2.2	40	16	Delete the "It is unknown..." sentence	Sentence retained
42	Chapter 3	Climate Change	3.4.2.4	40	33-35	Need to qualify the 35% assertion with "absent further actions"; what about resolving structural deficit	Thank you for your comment
43	Chapter 3	Land Use	3.5.1.1	41	6	The Southern Alt is 4,401 acres, but has 2,443 acres managed by federal agencies. You cannot add the Tribal lands to this sentence since it is discussing the 4,401 acres of the Southern Alt.	Change made
44	Chapter 3	Land Use	3.5.1.1	41	25	Again, you are mixing values of the two alternatives. Need to separate them out. The Federal land for each agency differs for each alternative.	No change needed
45	Chapter 3	Land Use	3.5.1.3	41	28	The data NRCS provided regarding prime farmland is outdated. Please refresh the data.	We plan to use existing data. If newer data exists we will incorporate it, but we could not find it.
46	Chapter 3	Land Use	3.5.1.3	41	27-31	Confusing when coupled with page 42, lines 37-38	No change made
47	Chapter 3	Land Use	3.5.1.2	41	28-31	This sentence is misleading on what is crossed. We do not cross or affect wilderness or wilderness study areas or wild and scenic rivers. Delete those from this paragraph. Please quantify the ACEC length or acres in a parenthetical. Please state only the Highway Alternative crosses the KIR.	No change made
48	Chapter 3	Land Use	3.5.2.2	42	24, 25	Permanent ROW is typically 100' and temporary construction ROW is typically 50'	Change made
49	Chapter 3	Land Use	3.5.2.3	43	40	Should be Highway Alternative in sentence.	Change made
50	Chapter 3	Land Use	3.5.2.3	43,44	44,1	Permanent ROW is typically 100' and temporary construction ROW is typically 50'	Change made
51	Chapter 3	Land Use	3.5.2.4	44	33	First sentence simply does not make sense to reader	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
52	Chapter 3	Land Use	3.5.2.4	45	1	The statement the Highway Alternative would mainly cross previously disturbed lands is incorrect. Approximately 64 acres of private land within the proposed ROW from Johnson Wash extending westward to Kanab along Highway 89 has been previously disturbed, out of approximately 836 acres along the Highway Alternative alignment. An additional 1.4 acres of land along Highway 389 at Pipe Springs Road has been previously disturbed. Approximately 770 acres comprising the remaining land along the Highway Alternative has not been disturbed any differently than the land along the Southern Alternative.	Change made
53	Chapter 3	Special Designations	3.6.2.2	47	11	Description of why the RMP needs amending should be consistent with Chapter 1, i.e. mention the management prescriptions conflict and the LPP outside of the utility corridor. This is universal for all descriptions of the RMPA.	Language was verified. Thank you for your comment. Without this proposal, the BLM would not amend the RMP at this time.
54	Chapter 3	Special Designations	3.6.2.2	47	22	We disagree with a major long-term effect to the OST major impact for the Southern Alternative. Per Appendix H-8, the criteria for a major effect is "Resource indicator thresholds are clearly exceeded." The Southern Alternative is in conformance with the Grand Staircase-Escalante National Monument Management Plan and the Kanab-Escalante Planning Area resource management plan. WCWCD was a cooperating agency in the GSENM and KEPA EIS and RMP process. WCWCD received written confirmation from Brandon Johnson, BLM realty specialist, that the BLM has "had multiple internal conversations recently between BLM management here in Kanab and the LPP management team working on the EIS, and our management's assertion over and over again has been that we believe LPP is completely in conformance with the new RMPs. The facilities also meet all VRM class requirements. A major long-term effect on the OST for the Southern Alternative is not justified per the resource's own criteria.	After discussions with subject matter experts on the Old Spanish Trail, we agree that the long-term impacts would not be major. Revised section and overall changes to effects determinations removed from documents.
55	Chapter 3	Special Designations	3.6.2.2	47	28 and 29	The sentence: However, fugitive dust generated from construction activities would temporarily affect visibility/views across the Arizona Strip, is not consistent with the analysis presented in Appendix H-5 Air Quality, which states fugitive dust along the Southern Alternative would disperse to below the National Ambient Air Quality Standards within 643 feet of the construction. This distance is 3 percent of the shortest distance from the Southern Alternative to Pipe Spring National Monument. This effect would be de minimis when viewed from Pipe Spring National Monument.	This is consistent with H-5 Air Quality. Both sections are described slightly differently. Both are accurate
56	Chapter 3	Special Designations	3.6.2.2	48	6	Horizontal directional drilling or jack and bore construction would not be feasible from the top of Kanab Creek Canyon (from outside the ACEC boundaries) to protect resources within the ACEC from construction effects. More extensive tunneling under the Kanab Creek Canyon would require a drain vault and access road that would traverse several hundred feet of the canyon. These features would cause greater environmental and cultural impacts than if we were to do the crossing at its current proposed location.	Deleted reference
57	Chapter 3	Special Designations	3.6.2.3	48	25	During construction, there will be effects upon individuals accessing the Monument.	No change made

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58	Chapter 3	Special Designations	3.6.2.4	48	46	We disagree with a major long-term effect to the OST major impact for the Southern Alternative. Per Appendix H-8, the criteria for a major effect is "Resource indicator thresholds are clearly exceeded." The Southern Alternative is in conformance with the Grand Staircase-Escalante National Monument Management Plan and the Kanab-Escalante Planning Area resource management plan. WCWCD was a cooperating agency in the GSENM and KEPA EIS and RMP process. WCWCD received written confirmation from Brandon Johnson, BLM realty specialist, that the BLM has "had multiple internal conversations recently between BLM management here in Kanab and the LPP management team working on the EIS, and our management's assertion over and over again has been that we believe LPP is completely in conformance with the new RMPs. The facilities also meet all VRM class requirements. A major long-term effect on the OST for the Southern Alternative is not justified per the resource's own criteria.	After discussions with subject matter experts on the Old Spanish Trail, we agree that the long-term impacts would not be major. Revised section and overall changes to effects determinations removed from documents.
59	Chapter 3	Special Designations	3.6.2.2	48	1 and 2	This continued sentence refers the reader to the No Action cumulative effects section 3.6.2.1, which states the Proposed Action would not contribute to the cumulative effects to lands with special designations expected from past, present, and RFFAs because it would not be constructed. This reference is not consistent with the effects described in other sections.	This is because there is no additional cumulative effect of the no action alternative.
60	Chapter 3	Special Designations	3.6.2.3	48	32 to 35	This sentence refers the reader to the No Action cumulative effects section 3.6.2.1, which states the Proposed Action would not contribute to the cumulative effects to lands with special designations expected from past, present, and RFFAs because it would not be constructed. This reference is not consistent with the effects described in other sections.	This is because there is no additional cumulative effect of the no action alternative.
61	Chapter 3	Special Designations	3.6.2.4	48	43 to 46	These two sentences state the two action alternatives would have the same effects on the Old Spanish National Historic Trail, when there would be significant differences in the effects between the alternatives in the segments where they separate and not common. The effects of the Southern Alternative on visual changes, air pollution (fugitive dust), noise, and construction traffic would occur between four and six miles away from the Old Spanish National Historic Trail, with the effects not measurable at these distances. The effects of the Highway Alternative on visual changes, air pollution (fugitive dust), noise, and construction traffic would occur within one mile and mostly within one-half mile, with most effects measurable but minor. These differences in the effects compared between the Southern and Highway alternatives are much different, as documented from analyses presented in other referenced Appendix H reports.	After discussions with subject matter experts on the Old Spanish Trail, we agree that the long-term impacts would not be major, and that impacts from both action alternatives would not be the same where the two alternative alignments diverge. Revised section and overall changes to effects determinations removed from documents.
62	Chapter 3	Special Designations	3.6.2.4	49	3 and 4	The sentence states the two action alternatives would have local, temporary visibility effects from fugitive dust during construction on Pipe Spring National Monument. This would be true for the Highway Alternative; however, the Appendix H-5 Air Quality report states that fugitive dust for the Southern Alternative would be below the National Ambient Air Quality Standard within 643 feet of the construction, which would be four miles from Pipe Spring National Monument. Therefore, the comparable analysis of the two action alternatives is incorrectly characterized for the Southern Alternative for its effects on Pipe Spring National Monument.	This is consistent with H-5 Air Quality. Both sections are described slightly differently. Both are accurate

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63	Chapter 3	Special Designations	3.6.2.4	49	4 to 5	This omits that there would be major short-term visual impact from LPP construction through revegetation as this would be prominent from the Highway Alternative due to its close proximity to this trail through the KIR.	After discussions with subject matter experts on the Old Spanish Trail, we agree that the long-term impacts would not be major, and that impacts from both action alternatives would not be the same where the two alternative alignments diverge. Revised section and overall changes to effects determinations removed from documents.
64	Chapter 3	Transportation	3.7.2.2	50	30	We do not plan to allow or encourage public access to permanent access roads. Please insert the following sentence from the LPP POD: "Access controls, such as fences or gates, will be coordinated with applicable landowners and agencies during final design."	Change made
65	Chapter 3	Transportation	3.7.2.2	50	40	Scheduling measures may conflict with other measures related to visual resources or noise. The state cannot commit to limiting construction traffic to non-peak tourist months. This mitigation should not be needed for a minor, short term effect.	Modified mitigation measure after discussion with the proponent
66	Chapter 3	Transportation	3.7.2.3	51	22	During construction, because the pipeline runs along the roadway for a greater length, the impacts would be greater.	No change made
67	Chapter 3	Transportation	3.7.2.4	51-52	43; 1 to 2	Note that the KIR has asked for access roads to be locked.	Change made
68	Chapter 3	Recreation	3.8.2.2	56	11 through 27	Permanent effects on established, official trails or other recreation amenities would be negligible and would not require in-kind replacement. Mitigation involving new or in-kind facilities should not be required. Impacted existing recreation facilities will be restored after construction in those areas are complete.	Removed this mitigation measure
69	Chapter 3	Water Rights	3.9.1.3	58	28	The water for the CUP ultimate phase was "segregated" from Water Right No. 41-2963, not "transferred."	Change made
70	Chapter 3	Water Rights	3.9.1.3	58	37	Insert "up to" prior to "86,249 acre-feet".	Change made
71	Chapter 3	Water Rights	3.9.1.3	58	38	The word "diversion" should be changed to "rediversion." That is how it described under Utah law and in UBWR's April 13, 2020 change application filed with the Utah State Engineer.	Change made
72	Chapter 3	Water Rights	3.9.1.3	58	38	UBWR filed its LPP change application with the Utah State Engineer on April 13, 2020.	Change made
73	Chapter 3	Water Rights	3.9.1.3	58	39	Replace the word "pump" with "redivert."	No change made
74	Chapter 3	Water Rights	3.9.1.3	58	43	Application was filed April 13, 2020	Reference deleted
75	Chapter 3	Water Rights	3.9.1.3	58	15-16	In the sentence that begins: "Utah officials...", revise as follows: "Utah officials represent that their reliable supply from the Colorado River System is 1,369,000 acre-feet annually, of which 361,000 acre-feet are estimated to remain for future development."	Change made
76	Chapter 3	Water Rights	3.9.1.3	58	29-37	Water Right No. 41-3479 was assigned by Reclamation to "UBWR", not to the state of Utah.	Change made
77	Chapter 3	Water Rights		59	12	UBWR isn't really the one's involved in these discussions, it is UDWR	Change made
78	Chapter 3	Water Rights	3.9.2.2	59	28	Should say diverted "in priority"	Reject insertion
79	Chapter 3	Water Rights	3.9.2.4	60	8	Replace "up to 1,369,000 acre feet" with "up to 23% of the water available in Colorado River's upper basin."	Reject insertion, reference to 23% is mentioned previously in the document
80	Chapter 3	Hydrology	3.10	60	17	"for other models used to assess other resources", could describe or list "other models"	No change needed

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81	Chapter 3	Hydrology	3.10	60	20	Introducing a new naming convention (i.e., Pipeline Alternative) could be confusing? Could you just state that both the Southern and Highway alts would be the same, but still use "Southern and Highway Alternatives" in your headings, tables, etc.	Change made
82	Chapter 3	Hydrology	3.10	60	35	Change "Utah" to "UDWRe"	Change made
83	Chapter 3	Hydrology	3.10.1.1	60	36	Change "Utah developed the Virgin River Daily Simulation Model (VRDSM) to determine the impacts of the additional water into the Virgin River system." to "Utah applied the Virgin River Daily Simulation Model (VRDSM) to determine the impacts of the additional water into the Virgin River system." The model was developed prior to the LPP EIS studies for other State and District uses.	Change made
84	Chapter 3	Hydrology	3.10.1.1	61	1	Change "instream flow requirements" to "streamflow requirements to meet downstream senior water rights"	Change made
85	Chapter 3	Hydrology	3.10.1.3	62	3	Need to add a discussion of Virgin River existing conditions.	Information was incorporated into the section
86	Chapter 3	Hydrology	3.10	62	17-21	Duplicate with Page 61 Line 6-10	Change made
87	Chapter 3	Hydrology	3.10.1.3	63	10	Regarding this sentence: "Consequently, this water travels along the top of the reservoir as an overflow density current, leaving the waters below the pipeline level (i.e., elevation 3,470 feet) essentially untouched." I'm assuming this is referring to the Glen Canyon Dam outlet. It should be made clear that this is not referencing the LPP. Penstock or dam outlet would be a better term.	No change needed
88	Chapter 3	Hydrology	3.10.2.1	63	17	If LPP is not built, Utah would likely divert the water upstream, the water will never enter Lake Powell. Thus water elevations at Lake Powell in the future would likely be the same under any scenario.	Thank you for your comment
89	Chapter 3	Hydrology	3.10.2.2	63	37	Add sentence to summary that explains that returns flows would be less as secondary demands increase or climate change decreases Virgin River flow.	No change needed
90	Chapter 3	Hydrology	3.10.2.2	63	38	Add sentence to summary that explains that returns flows would be less as secondary demands increase or climate changes decrease Virgin River flow.	No change needed
91	Chapter 3	Hydrology	3.10.2.2	63		District will take actions necessary in future to address return flows in the Virgin River. Provided proposed language to Reclamation.	No change needed
92	Chapter 3	Hydrology	3.10.2.2	64	5	Identify or reference what the "reasonably foreseeable projects" are.	Change made
93	Chapter 3	Hydrology		64	7	Add the word "minimal" increased flows	No change needed
94	Chapter 3	Hydrology	3.10.2.3	64	11	Add a discussion of effects to Lake Powell Releases and Lake Mead elevations	No discussion to be added
95	Chapter 3	Hydrology	3.10.2.3	64	14	If LPP is not built, Utah would likely divert the water upstream, the water will never enter Lake Powell. Thus water elevations at Lake Powell in the future would likely be the same under any scenario.	No change needed
96	Chapter 3	Hydrology	3.10.2.3	64	26	Additional clarification is needed on the effects to Lake Powell elevations. After the sentence "...later in the later modeled years." add these sentences: In the No Action Alternative, the water that would be diverted by the LPP would accumulate over time in Lake Powell, whereas the LPP diverts the water each year. This accumulation over time in the No Action Alternative leads to the larger differences in pool elevation. Changes in elevation from one year to another would typically be a few inches.	No change needed
97	Chapter 3	Hydrology	3.10 Hydrology	64	26	Change "later in the later modeled years" to "in the late stage of simulations years"	Change made
98	Chapter 3	Hydrology	3.10.2.3	64	37	"DNF" appears without a prior definition (Direct Natural Flow?)	Already defined in the climate change section

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99	Chapter 3	Hydrology		64		VRDSM Model results should reflect language from the district on return flows	No change needed
100	Chapter 3	Hydrology	3.10.2.3	65	30	Add sentence to summary that explains that returns flows would be less as secondary demands increase or climate change decreases Virgin River flow.	No change needed
101	Chapter 3	Hydrology	3.10.2.3	65	36	Reads "Differences in simulated streamflow" should read "Differences in average simulated streamflows"	Change made
102	Chapter 3	Hydrology		65	45	Delete center from "St. George M&I demand center"?	Change made
103	Chapter 3	Hydrology	3.10.2.3	66	8	The last paragraph on shortages is not an effect on river or reservoir hydrology. OK to leave in the appendix, but don't think it's relevant to this section of Chapter 3.	This is important to disclose to the public, not removed
104	Chapter 3	Water Quality	3.11	66	15	The water quality section should address comments made regarding mobilization of contaminated sediments in Lake Powell.	Need more specific information from the proponent...this is on a header.
105	Chapter 3	Water Quality	3.11.2.2	68	17	The alignment through Kanab Creek avoids the canyon walls. What long-term effects are expected at Kanab Creek? Erosion and restoration measures would eliminate long-term erosion effects.	Thank you for your comment. No change needed
106	Chapter 3	Water Quality	3.11.2.2	69	29	What support for "major and permanent" water quality impacts from climate change	Change made
107	Chapter 3	Aquatic Invasive Species	3.12.1.1	70	36	Change to "hydraulic" connection.	Change made. Paragraph added to provide context
108	Chapter 3	Aquatic Invasive Species	3.12.2.1	72	10	Missing verb "projects that may [have] overlapping effects"	Change made
109	Chapter 3	Aquatic Invasive Species	3.12.2.2	73	12	Sentence is not complete.	Change made
110	Chapter 3	Aquatic Invasive Species	3.12.2.2	73	14	Fractured sentence	Change made
111	Chapter 3	Vegetation Communities	3.13.2.2	75	42	Temporary effects would be 4,233 acres and permanent effects would be 168 acres. The numbers should match the latest vegetation data that was provided.	Change made
112	Chapter 3	Vegetation Communities	3.13.2.3	77	26	Temporary effects would be 3,891 acres and permanent effects would be 171 acres. The numbers should match the latest vegetation data that was provided.	Change made
113	Chapter 3	Vegetation Communities	3.13.2.4	77	36-39	Numbers should be the same as in previous comments in this section.	Change made
114	Chapter 3	Wetland and Riparian	3.14.1.3	78	38	The wetland at Gould Wash is not in the project area. When the Cedar City pipeline was removed from the project description several years ago, this wetland was no longer in the project area. Please remove any reference to this wetland. Also, references to wetlands in the remaining section should be removed. Only riparian habitat exists in the project area.	Change made. Gould Wash removed. Reference to wetlands removed
115	Chapter 3	Vegetation Communities	3.13.2.4	78	5-6	Numbers and narrative should be the same as in previous comments in this section.	Change made
116	Chapter 3	Wetland and Riparian	3.14.2.2	79	28	Where are permanent effects on wetlands and riparian areas? We do not impact any wetlands.	Change made
117	Chapter 3	Wetland and Riparian	3.14.2.2	80	15	Horizontal directional drilling or jack and bore construction would not be feasible from the top of Kanab Creek Canyon to protect resources within the canyon from construction effects. More extensive tunneling under the Kanab Creek Canyon would require a drain vault and access road that would traverse several hundred feet of the canyon. These features would cause greater environmental and cultural impacts than if we were to do the crossing at its current proposed location.	Removed this mitigation measure

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
118	Chapter 3	Wetland and Riparian	3.14.2.3	80	28	Change "contains little" to "contains 0.09 acres less"	Change made
119	Chapter 3	Wetland and Riparian	3.14.2.4	80	42	State that riparian vegetation would be restored.	Change made
120	Chapter 3	Wetland and Riparian	3.14.2.4	81	1-6	The proposed restoration of Kanab Creek would minimize construction-related impacts. They are highly effective techniques as described in the Sensitive Species - Fish and Wildlife section of this EIS. The statements in this paragraph are speculative and they contradict the more thorough analysis in the Sensitive Species - Fish and Wildlife section.	Deletion made in the text
121	Chapter 3	Sensitive Species – Plants	3.15	81	7	More quantitative information on SSP would be helpful. Is there information from the surveys or the 2016 Study Reports that could be pulled in?	Specialist pulled in pertinent information from all possible sources
122	Chapter 3	Sensitive Species – Plants	3.15.2.1	82	20	"effective" should be "effect"	Change made
123	Chapter 3	Sensitive Species – Plants	3.15.2.2	83	15	This refers to KIR plants. This should really be the Tribe's identified plants?	No change needed
124	Chapter 3	Sensitive Species – Plants	3.15.2.2	84	6	Sub-alternative 3 does not reduce the ACEC acreage.	Change made
125	Chapter 3	Sensitive Species – Plants	3.15.2.2	84	21	BLM has previously indicated that watering may not be desirable as it can encourage noxious weed growth and erosion. We feel the EPM is sufficient as is. Temporary watering may involve spraying and sprinkling seeded and fertilized areas in the ROWs using water appropriate for vegetation and soil conditions. Spraying and sprinkling quantities and timing will be reviewed by the applicable land management agency as part of the plan specifications.	No change made. It is a mitigation measure.
126	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.1	86	14	If the project is not built, it will put more pressure on the Virgin River and those species.	To be more consistent with the hydrology statement (p. 63 of the DEIS lines 18-20); suggest revision to say "If the proposed LPP Project is not built, local planned projects would utilize more water from the Virgin River Basin. This could lead to reduced flows in the Virgin River increasing pressure on sensitive fish within the system."
127	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.2	86	35	This is the first instance I've come across in Chapter 3 regarding the exchange contract. Should the exchange contract be discussed in all resources?	No change needed
128	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.1	86	27-28	This sentence can be interpreted to suggest the Project will cause or lead to the introduction of non-native fish species. I do not recall any discussion on this point elsewhere in the DEIS. Other than perhaps quagga mussels, I do not see how the Project could cause introductions of non-native fish species. And mussels are generally not classified as fish. What is the purpose for this statement?	This project would not cause it. This is in the cumulative effects section and the other projects could cause this. No change needed

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
129	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.1	86		The No Action Alternative could have a detrimental effect on sensitive fish species in the Green River. Without the LPP, there is no incentive for an exchange agreement between BOR and UBWR ensuring 86,000 AF of water flows down the Green River each year below Flaming Gorge Dam for the benefit of endangered and threatened fish species. Without the exchange agreement, UBWR could divert its 86,000 AF from tributaries and adversely affect minimum flows necessary in the Green River for threatened and endangered fish species.	Thank you for your comment
130	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.2	87	11	Change sentence to "...outside of sensitive seasons per the EPMs in the POD..."	Change made
131	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	88	20	There are no permanent riparian impacts. The temporary impacts would be 2.85 acres.	Made change based on the correct #
132	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	88	17-18	These values do not match the most recent vegetation tables.	Made change based on the correct #
133	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	88	Line 32	To avoid confusion, this line should clarify that it referring to "non-native species" of flora and not fauna	No change needed
134	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	89	38	The reference to "non-native species" in this line should be changed to clarify it is referring to non-native species of plants.	No change needed
135	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	89	Line 11	Both GCNRA and Pipe Springs National Recreation Area are managed pursuant to their respective enabling legislation and the NPS Organic Act. GCNRA enabling legislation is found in 16 U.S.C. § 460dd.	No change needed
136	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.3	90	39	The State is not committing to covering or backfilling open trenches, or committing to a limit on length of open trench. These measures would not be feasible from a constructability standpoint. The existing EPMs are sufficient to protect wildlife and were previously approved by BLM.	No change made. It is a mitigation measure.
137	Chapter 3	Sensitive Species – Fish and Wildlife	3.16.2.4	91	4-5	These values do not match the most recent vegetation tables.	Made change based on the correct #
138	Chapter 3	Threatened and Endangered Species	3.17.1.3	92	27	Condor in the Action Area is not ESA-listed. It's an experimental, non-essential population off NPS lands, and treated as threatened on NPS lands. Please make this clarification in this section. Also, describe the Condor Agreement USFWS and other agencies have with local agencies regarding condor management.	No change needed
139	Chapter 3	Threatened and Endangered Species	3.17.2.1	92	Line 39	The No Action Alternative could have a detrimental effect on sensitive fish species in the Green River. Without the LPP, there is no incentive for an exchange agreement between BOR and UBWR ensuring 86,000 AF of water flows down the Green River each year below Flaming Gorge Dam for the benefit of endangered and threatened fish species. Without the exchange agreement, UBWR could divert its 86,000 AF from tributaries and adversely affect minimum flows necessary in the Green River for threatened and endangered fish species.	Thank you for your comment
140	Chapter 3	Threatened and Endangered Species		95	17	Add "minimal" increased flows	Reject insertion
141	Chapter 3	Threatened and Endangered Species	3.17.2.3	97	32	Would climate change effects as it relates to species be discussed in this section? Discuss how climate change is affecting the species. This comment also applies to special status plants and wildlife cumulative effects sections.	Analysis is currently commensurate with the analysis needed. See Appendix
142	Chapter 3	Threatened and Endangered Species	3.17.2.3	98	5	Change sentence to: "Potential introduction of non-native fish by development activities..."	Reject insertion

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
143	Chapter 3	Threatened and Endangered Species	3.17.2.3	98	21	Change the sentence that starts with "The potential to mitigate effects to occupied or suitable upland habitat..." to the following: Mitigating effects to occupied or suitable upland habitat can be challenging due to the desert environment and the potential for invasive weeds such as annual cheatgrass.	No change needed
144	Chapter 3	Threatened and Endangered Species	3.17.2.3	98	27	The alignment would be fully restored. Two-track roads will be established along certain portions of the alignment, but the alignments will not be bladed and habitat will be allowed to reestablish. A moderate cumulative impact is not justified.	No change made. EPM B.1.17 says "Where feasible, vegetation within the ROWs will be crushed instead of removed by blading, to minimize impacts to soils"; leaving some indication that blading may occur. Some vegetation communities may not recover black brush (if at all) and pinyon-juniper woodland communities may take longer and cheatgrass in the Mojave Region in Mojave Desert tortoise habitat.
145	Chapter 3	Threatened and Endangered Species	3.17.2.5	99	24	The analysis in this section shows substantially more impacts to Siler under the Highway Alt than the Southern Alt. ESA effects, therefore, are not similar for the alternatives.	Change made
146	Chapter 3	Visual Resources	3.18.2.1	103	28	The use of transportation resources in this sentence is incorrect; the sentence should refer to visual resources	Change made
147	Chapter 3	Visual Resources	3.18.2.2	104	4	Is the 2020 Revised Final Visual Study Report the same as Appendix H-21? If so, just call it Appendix H-21.	2020 Revised Final Visual Study Report is not the same as Appendix H-21. Much of the content is the same, but more detail is included in the Study Report. Thank you for your comment
148	Chapter 3	Visual Resources	3.18.2.3	106	26	Change to "The Highway Alternative would not traverse BLM-administered lands where the alignment differs from the Southern Alternative,"	Change made
149	Chapter 3	Visual Resources	3.18.2.4	107	6-7	Effects on GCNRA lands are applicable to both alternatives.	Change made
150	Chapter 3	Visual Resources	3.18.2.4	107	6-7	Effects on Reclamation lands associated with the Intake are applicable to both alternatives. Table 3.18-4 also needs to be edited to have a moderate effect on Reclamation land for the Highway Alternative.	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
151	Chapter 3	Visual Resources	3.18.2.4	107	22 to 30	This paragraph states approximately 50 miles of the Southern Alternative would go through primarily undeveloped areas with natural landscape characteristics, which is incorrectly described. Approximately 11 miles of the Southern Alternative would cross through primarily undeveloped areas with natural landscape characteristics from Highway 89 through White Sage Wash to the Navajo-McCullough 500 kV transmission line corridor. The remaining 41.4 miles of the Southern Alternative (in its separate alignment from the Highway Alternative) would be co-located in the Navajo-McCullough Transmission Line utility corridor and parallel to the transmission line, which is a significant visual intrusion on the landscape with the corridor designated by BLM as VRM Class IV, and parallel to Yellowstone Road for the last six miles to the junction with Highway 389. The Highway Alternative is described as going through only 8 miles of primarily undeveloped areas. The actual difference between the Southern Alternative and the Highway Alternative in alignment across primarily undeveloped areas is 3 miles. The Southern Alternative would follow existing linear infrastructure to the extent possible and would utilize an existing utility corridor, as suggested by BLM to UDWR, to minimize effects on resources including visual resources. The Highway Alternative would create slightly less visual contrast in an area seen by far more viewers along Highway 389 and Highway 89 compared to the Southern Alternative which would create slightly more visual contrast in an area seen by very few viewers.	Edited and a new paragraph created
152	Chapter 3	Cultural Resources	3.19.1.1	108	25	The parenetical example should also include auditory and atmospheric.	Change made
153	Chapter 3	Cultural Resources	3.19.1.1	108	32	Same comment re APE definitions.	No change needed
154	Chapter 3	Cultural Resources	3.19.1.1	108	35	the example provided includes geoarchaeological studies. The only described geoarchaeological excavations (n=5*) is mentioned in Appendix H-22 but no explanation of the results are provided. This appears to be the only reference to geoarchaeological investigation in the DEIS.	Thank you for your comment
155	Chapter 3	Cultural Resources	3.19.1.1	108	18-25	The definition of the APE here differs from the Class III reports and from BLM's and FERC's determinations. The 2-mile APE is the indirect/American Indian APE, while the 250-foot APE is the direct APE. Why was this re-defined? It also conflicts with line 32 - which defines the Project APE as the latter.	No change needed
156	Chapter 3	Cultural Resources	3.19.1	108	8 to 11	The sentence "In most cases, cultural resources that are located along the Project are finite, unique, fragile, and nonrenewable" needs a period. The same sentence is repeated starting on in 10-11.	Change made
157	Chapter 3	Cultural Resources	3.19.2.2	110	40-41	It is not entirely true that the pipeline construction area could not be adjusted enough to avoid sites. Some sites within the APE only intrude a short way into the ROW/construction corridor and could be avoided. This should be revised to say that not all sites could be avoided.	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
158	Chapter 3	Cultural Resources	3.19.2.2	110-116	page 110 28 and 34; page 111 line 2 and 24; page 114 line 32; page 115 line 19; page 115 Table 3.19-4 title line 30; page 116 line 23	Starting on page 110 and in 8 sperate noted instances the term "impact," "impacts," or "impacted" is used when it should be "effects under 106. Impacts are a NEPA term, effects are a Section 106 term.	Changes made
159	Chapter 3	Cultural Resources	3.19.2.2	111	4	The ROW is 150 feet. The direct APE is 250 feet. Correct this anywhere in this section.	No change needed
160	Chapter 3	Cultural Resources	3.19.2.2	111	16-17; Table 3.19-2	The 223 sites in line 16 does not match the eligible sites listed in the table. Is it 223 eligible? Or 214 eligible?	Change made
161	Chapter 3	Cultural Resources	3.19.2.2	111	18 to 19; 24 to 35	Throughout the DIES CR section indirect effects are listed as potential visual, auditory, and atmospheric. The only discussion of potential indirect effects is limited to lines 24 to 35 in reference to visual effects. No discussion of auditory or atmospheric are offered.	No change needed
162	Chapter 3	Indian Trust Assets	3.21.2.3	123	38-40	By definition, absent a ROW Agreement the LPP legally could not cross the KIR.	Sentence deleted
163	Chapter 3	Environmental Justice	3.23.1.3	131	14-15, 28	The document says that EJ populations are present in the "Project Area," but the refenced Table 3.23-1 includes 6 block groups from Page, Arizona and 4 block groups from Kane County. How can areas unaffected by the pipeline deliveries be categorized as the Project Area? At lines 14-15, the author says that the table includes "a sample of block groups from the surrounding region." The "surrounding region" is by definition outside the "Project Area".	Environmental Justice impacts often occur in geographic areas that do not align with the official project boundary. As a result, EJ study areas are typically different from the project boundaries for other resources. In cases of linear rights-of-way, it's customary to check for possible impacts from not only the operations phase, but for the construction phase as well. This is the case with the LPP. Areas around the entire construcion route were checked to determine the presence or non-presence of EJ populations.
164	Chapter 3	Environmental Justice	3.23.2.1	132	10	No action plan would require water rates to increase. Reduction in landscaping for parks including parks located in these areas.	Language added "...the increase in rates would be much less [under the No Action Alternative] than with the pipeline project (No Action rate increase small relative to Pipeline project)..."

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
165	Chapter 3	Environmental Justice	3.23.2.2	133	11 through 17	Supplement #3 does not allege damage to landscape features. The only time it mentions the term "damage" is in reference to a gold rush and dam building in the 1870s. The only time this supplement mentions well-being is in reference to a general loss of access to traditional foodstuffs and medicine. None of the specific plant habitat areas identified in the underlying reports are within the project area. Please provide support or revise or remove the conclusions.	Please refer to "Lake Powell Pipeline Project Draft Environmental Impact Statement Supplement Number 5" which was supplied in support of the EJ section of the DEIS.
166	Chapter 3	Environmental Justice	3.23.2.2	133	19-20	Effects on American Indian populations "described above" do not appear to relate to the RMP amendments. Need to describe how the RMPA alternatives affect EJ.	Edited to remove the RMP amendments section
167	Chapter 3	Environmental Justice	3.23.2.2	133	24-29	The preceding narrative does not support a conclusion of "substantial" EJ impact.	Edited to remove the qualitative magnitude language
168	Chapter 3	other	All			Finding a few instances of KCWCD. Need to scrub that from the document.	Change made
169	Chapter 3	other				Did not see a discussion of impacts on hydropower production	Not included in the socioeconomic analysis. Will consider between draft and final EIS
170	Chapter 4	Ethnographic Resources	4.2	135	16	Above it is two sites. This says "the site" Which is it?	Modified to say two sites. Made consistent
171	G Purpose and Need	Purpose and Need		6	6	Do we need to mention Quail Creek's minimum dead pool, does it have one?	No need to update
172	G Purpose and Need	Purpose and Need		11	12	Table 5.2-2 shows 303 gpcd, line 12 says 302 gpcd, need to make consistent or explain the difference (rounding?).	Change made
173	H Supplemental Resource Reports	Cultural Resources	H-22, 1.2.1	3	13-27	See comments on same section in EIS - two APEs are described and their relation to each other is unclear	No change needed
174	H Supplemental Resource Reports	Cultural Resources	1.2.1	3	31-32	"These study reports..." - This line references the current document.	Change made
175	H Supplemental Resource Reports	Cultural Resources	1.2.2.1	4	29	"were" should be "where"	Change made
176	H Supplemental Resource Reports	Cultural Resources	1.4.2	6	38	Terminal date for BMIII (A.D. 600) seems a bit early, and is 100 years earlier than PI start-date of A.D. 700 in succeeding paragraph. I usually see suggested terminal BMIII dates from as early as A.D. 750 and as late as A.D. 850.	No change needed
177	H Supplemental Resource Reports	Cultural Resources	1.4.2	7	25	"trades" should be "traded"	Change made
178	H Supplemental Resource Reports	Cultural Resources	1.4.3.1	12	32, 33	Confused about properties recommended "potentially eligible" under Criterion A. I don't find anything like that in the Class III report.	No change needed
179	H Supplemental Resource Reports	Cultural Resources	2.4	22	11 through 16	These numbers don't match the relevant table numbers.	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
180	H Supplemental Resource Reports	Electric and Magnetic Fields	2.2	8	14 and 15	Both the Paria and Buckskin substations would be upgraded as part of the Garkane system improvements to provide power to LPP pump stations. The Paria substation upgrade would include adding a 3-breaker ring bus, 138/24.9 kV, 30/40/50 MVA transformer, and four feeders. The Buckskin substation expansion would include adding two 230/138 kV 100 MVA transformers.	No change needed
181	H Supplemental Resource Reports	General Fish and Wildlife	1.2	2	2	May mention which species are covered here versus what are covered in the sensitive species section	No need to be redundant between sections
182	H Supplemental Resource Reports	General Fish and Wildlife	1.2	2	36	What is the rationale for the five year line between short term and long term impacts?	Rationale is based on professional and scientific judgment
183	H Supplemental Resource Reports	General Fish and Wildlife	1.4.8	15	28	Why is there no mention of other wildlife beyond big game and eagles? There should be a brief mention of general mammals, reptiles, etc. in the Affected Environment and Consequences sections.	They are included in the EIS either explicitly or by reference
184	H Supplemental Resource Reports	General Fish and Wildlife	1.4.8.2	20	1	Shouldn't bald and golden eagle be covered under the sensitive wildlife species appendix?	No. They are included in the EIS either explicitly or by reference
185	H Supplemental Resource Reports	General Fish and Wildlife	2.2	22	2	How long is restoration/reclamation expected to take to restore mule deer (and other big game) habitat	See definition for short-term effects. <5 years
186	H Supplemental Resource Reports	General Fish and Wildlife	2.2	22	6	How many acres of bighorn habitat would be impacted? Permanent vs temporary?	Data input
187	H Supplemental Resource Reports	General Fish and Wildlife	2	22	39	What is the rational for the difference between short term and long term impacts? For general wildlife and sensitive plants, it is 5 years. Need to be able to explain why it is different.	Rationale is based on professional and scientific judgment
188	H Supplemental Resource Reports	General Fish and Wildlife	2.2	22	40	How many acres of pronghorn habitat would be impacted? Permanent vs temporary?	Data input
189	H Supplemental Resource Reports	General Fish and Wildlife	2.2	23	34	Not sure we can say impacts to migratory birds would be negligible. While nest surveys would be conducted there is a chance of missing a nest. Additionally, there is no discussion on how construction would impact individuals, causing displacement during construction. Since birds may occur along the entire length of the project would be a minor impact.	Please note M-37050 and subsequent explanation/guidance by the US Fish and Wildlife Service
190	H Supplemental Resource Reports	General Fish and Wildlife	2.2	25	16	In the summary, there is no mention of fish. Also, this is first place small mammals, reptiles are mentioned with no discussion of impacts previously	Please see rest of document and reference studies
191	H Supplemental Resource Reports	General Fish and Wildlife	2.4	38	Table 2.4-1	Table should include aquatic species impacts. Or separate tables for terrestrial and aquatic.	Thank you for your comment

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
192	H Supplemental Resource Reports	Geology and Soils	2.2	46	10 to 11	Figures 5-1 and 5-2 show lithostratigraphic data for the Triassic formations TRmm (Middle Red Member of the Moenkopi Formation) and TRms (Shnabkaib Member of the Moenkopi Formation) which both contain gypsum and are correlated to biological soil crusts displayed on a BLM map showing areal extent of biological soil crusts on portions of the Arizona Strip Field Office (BLM map dated February 25, 2014 can be provided). The segment of the Southern Alternative not common with the Highway Alternative would disturb an estimated 114.5 acres of TRmm and TRms formations correlated to biological soil crusts and confirmed by field sampling. The segment of the Highway Alternative not common with the Southern Alternative would disturb an estimated 256.4 acres of TRmm and TRms formations correlated to biological soil crusts and confirmed by field sampling. This analysis was performed by Stantec in response to a BLM comment on the Final License Application filed with FERC and associated text was amended to the Geology and Soils Study Report in a filing with FERC.	Information was incorporated into the section
193	H Supplemental Resource Reports	Geology and Soils	2.4	50	28	Revise the table text for BLM regarding Southern Alternative to be consistent with the analysis showing gypsum rock formations correlation with biological soil crusts (see Comment #192).	Information was incorporated into the section
194	H Supplemental Resource Reports	Geology and Soils	2.4	50	10 to 14	This section should state the comparative difference in soil derived from gypsum rock formations with correlation to biological soil crusts between the Southern Alternative and Highway Alternative (see Comment #192).	Information was incorporated into the section
195	H Supplemental Resource Reports	Geology and Soils	2.4	50	16 to 26	This section should state the comparative difference in soil derived from gypsum rock formations with correlation to biological soil crusts between the Highway Alternative and Southern Alternative (see Comment #192).	Information was incorporated into the section
196	H Supplemental Resource Reports	Geology and Soils	2.4	50	7 to 10	The sentence is factually incorrect. Both alternatives would disturb soils that are currently undisturbed. The Highway Alternative alignment would disturb mostly deeper soils (greater than 15 feet deep) and 0.76 mile of exposed bedrock or covered with a thin soil mantle (less than 1 to 2 inches deep). The Southern Alternative would disturb 24.6 miles of exposed bedrock or covered with a thin soil mantle (less than 1 to 2 inches deep). The steep sides of Kanab Creek Canyon result from the bedrock, mostly exposed, and the existing thin soil mantle (where it occurs over the bedrock) would be removed during bedrock excavation to install the pipeline. The risk of soil loss would occur from soil placed in the steep ROW during site restoration to aid in revegetation. Soil loss on the Kanab Creek Canyon slopes likely would be proportional to the quantity of soil applied for ROW restoration to achieve revegetation goals.	No change needed
197	H Supplemental Resource Reports	Hydrology	App H-12, 1.3.1.2	8	19,20	Reach gains are included in the model, this statement should be deleted.	Change made
198	H Supplemental Resource Reports	Hydrology	H-12: Hydrology	39-41	1	Table 2.3-1. Note the physical location of QX21, QX 26, QX27, QX28, QX29 at the end of table.	This is a direct copy from the proponent provided table
199	H Supplemental Resource Reports	Indian Trust Assets	H-24, 1.2.2	3	17	"KIRs" is not the correct term, this should be the Tribe - not the reservation.	Change made
200	H Supplemental Resource Reports	Indian Trust Assets	H-24, 2.2.1	5 to 6	all	The reason that the RMPA Amendments would not affect ITAs is not because of the protective stipulations in the respective RMPA alternatives, rather it is because none of the amendments apply to any tribal land. These are all off-reservation. See Fig. 2.3-2 and following in the EIS at pp. 25-27. This should be acknowledged.	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
201	H Supplemental Resource Reports	Indian Trust Assets	H-24, 2.4	7	14	Add the Southern Alternative to the No Action alternative as having no effect on the ITA.	Already mentioned on pg 7 line 22
202	H Supplemental Resource Reports	Land Use	1.2	6	6	The words transportation resources used in this sentence are incorrect; replace with land use	Change made
203	H Supplemental Resource Reports	Land Use	1.2	6	33	The BLM-administered land that would be affected by the LPP is different between the Southern and Highway alternatives. This part of the sentence implies the same acreage (2,127 acres) would be affected by each alternative, which is not factual. One sentence should address the land area affected by the Southern Alternative; a second sentence should address the land area affected by the Highway Alternative.	Change made
204	H Supplemental Resource Reports	Land Use	1.2	6	29 and 30	Inclusion of tribal lands in this part of the sentence is incorrect; it implies that tribal lands would be included in both the Southern and Highway alternatives. The Southern Alternative would not affect any tribal lands. A suggested correction includes breaking the information and data in this sentence into two sentences, one for the Southern Alternative, and a second sentence for the Highway Alternative.	The comments herein describe both action alternatives. No change made
205	H Supplemental Resource Reports	Land Use	1.3	7	23	I believe "Sewer" should be replaced with "Stormwater" and should be called the Stormwater Pollution Prevention Plan (SWPPP)	Change made
206	H Supplemental Resource Reports	Land Use	2.4	22	17 to 19	The statement the Highway Alternative would mainly cross previously disturbed lands is incorrect. Approximately 64 acres of private land within the proposed ROW from Johnson Wash extending westward to Kanab along Highway 89 has been previously disturbed, out of approximately 836 acres along the Highway Alternative alignment. An additional 1.4 acres of land along Highway 389 at Pipe Springs Road has been previously disturbed. Approximately 770 acres comprising the remaining land along the Highway Alternative has not been disturbed any differently than the land along the Southern Alternative.	Changes made globally in the appendix
207	H Supplemental Resource Reports	Noise and Vibration	1.2.1	6	25 to 26	Delete this bullet; natural gas power generation is not part of LPP	Change made
208	H Supplemental Resource Reports	Noise and Vibration	1.2.1	6	27 to 29	Delete this bullet; natural gas power generation is not part of LPP	Change made
209	H Supplemental Resource Reports	Noise and Vibration	1.2.1	6	32 to 33	Delete this bullet; natural gas power generation is not part of LPP	No change needed
210	H Supplemental Resource Reports	Recreation	2.2.1.10	30	28	The "major long-term" effects to the views cape of Studhorse Mesa and Skylight Arch due to LPP operations contradicts what is said in the prior paragraph ("minor long-term" effect due to the landscape scar after construction). A "major effect" also contradicts the visual resource effects determination in Appendix H-21, which has negligible to minor effects on visual resources for the pipeline ROW in that VAU. A "major long-term" is not justified for this recreation resource, it should be minor to be consistent with the visual and construction analyses.	A slightly different approach has been taken regarding effects determinations...comment noted

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
211	H Supplemental Resource Reports	Recreation	2.2.9.2	43	32	The "major long-term" effects to the SMSRMA is not justified as it contradicts the criteria for intensity of effects discussed in Chapter 1 of this Appendix. The criteria for major effects require large effects that are highly noticeable, are permanent, and clearly exceed resource indicators. A 0.08 percent decrease in the area is measurable but not large. The removed land does not contain existing trails or amenities. HS-4 and HS-5 would have high visual contrast, but those facilities still meet the resource indicator (VRM Class IV designation) which allow for "major modification of the existing character of the landscape". Based on the effects criteria and resource indicators, this effect should be minor.	A slightly different approach has been taken regarding effects determinations...comment noted
212	H Supplemental Resource Reports	Recreation	2.2.10.7	47	6	The "major long-term" effects to the SH State Park is not justified as it contradicts the criteria for intensity of effects discussed in Chapter 1 of this Appendix. The criteria for major effects require large effects that are highly noticeable, are permanent, and clearly exceed resource indicators. A 0.7 percent decrease in the area is measurable but not large. The removed land does not contain existing established trails or amenities and would not create a large reduction in shoreline, dispersed camping area, or boating surface area. HS-6 would have minor visual contrast, but that facility still meets the resource indicator (VRM Class IV designation) on nearby BLM land which allow for "major modification of the existing character of the landscape". Based on the effects criteria and resource indicators, this effect should be minor.	A slightly different approach has been taken regarding effects determinations...comment noted
213	H Supplemental Resource Reports	Recreation	multiple	multiple	multiple	The "major temporary effects" during construction for most recreation resources contradict the criteria for intensity of effects discussed in Chapter 1 of this Appendix. The criteria for moderate and major effects require, among other things, for the effect to be long-term or permanent. If the effect is short-term then it would be minor per the criteria. Also, all the "major temporary effects" due to construction are based on noise, air quality, traffic, and visual impacts. However, air quality, noise, and traffic effects would be negligible to minor (see their respective Appendices). Most visual impacts would be negligible to moderate. Based on the recreation effects criteria and to be consistent with noise, air quality, traffic, and visual resource effects determination, all construction-related short-term effects on recreation would be minor.	A slightly different approach has been taken regarding effects determinations...comment noted
214	H Supplemental Resource Reports	Sensitive Species – Fish and Wildlife	1.4	16	1	Suggest updating the monarch butterfly discussion with the new CCAA.	Thank you for your comment
215	H Supplemental Resource Reports	Sensitive Species – Fish and Wildlife	2	24	24	Would say that "following reclamation the operation of the pipeline and facilities" would not impact migration.	Already stated earlier in this appendix
216	H Supplemental Resource Reports	Sensitive Species – Fish and Wildlife	2	26	11	Need to provide the source that says there would be minimal change to temperature and dissolve oxygen	Source would be the Surface Water Quality Appendix; added reference
217	H Supplemental Resource Reports	Sensitive Species – Fish and Wildlife	2.2	31	21	Break out the temporary and permanent impact acres in this section. Also, to better support the effect determination, it would be help to provide a context for these numbers. Is it a lot, a little? The reader has no way of knowing.	Acreages were pulled from the Vegetation appendix
218	H Supplemental Resource Reports	Sensitive Species – Fish and Wildlife	2.3	32	11	See comment above about context for acres impacted	Acreages were pulled from the Vegetation appendix
219	H Supplemental Resource Reports	Sensitive Species – Plants	1.2	2	8	What is the rationale for the 5 year "line" between short term or long term impacts.	Professional judgment and experience determined this from a local office. No change needed

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220	H Supplemental Resource Reports	Sensitive Species – Plants	1.2.1	5	14-16	Replace sentence with: "Plant surveys will be conducted prior to construction."	Change made
221	H Supplemental Resource Reports	Sensitive Species – Plants	2.2	36	47	Certified by who? BLM or someone else?	The company certifies it. No change made
222	H Supplemental Resource Reports	Sensitive Species – Plants	2.2.1	37	36	BLM has previously indicated that watering may not be desirable as it can encourage noxious weed growth and erosion. We feel the EPM is sufficient as is. Temporary watering in select locations may involve spraying and sprinkling seeded and fertilized areas in the ROWs using water appropriate for vegetation and soil conditions. Spraying and sprinkling areas, quantities and timing will be reviewed by the applicable land management agency as part of the plan specifications.	No change made. It is a mitigation measure.
223	H Supplemental Resource Reports	Special Designations	1.1	4	10-17	The Southern Alternative is also in conformance with the Grand Staircase-Escalante National Monument Management Plan and the Kanab-Escalante Planning Area resource management plan. WCWCD was a cooperating agency in the GSENM and KEPA EIS and RMP process. WCWCD received written confirmation from Brandon Johnson, BLM realty specialist, that the BLM has "had multiple internal conversations recently between BLM management here in Kanab and the LPP management team working on the EIS, and our managements assertion over and over again has been that we believe LPP is completely in conformance with the new RMPs. "	Nothing in this section to revise, because it does not state that the alternatives are not in conformance with the KEPA RMP.
224	H Supplemental Resource Reports	Special Designations	2.2	13	13 to 15	The sentence: However, fugitive dust generated from construction activities would temporarily affect visibility/views across the Arizona Strip, is not consistent with the analysis presented in Appendix H-5 Air Quality, which states fugitive dust along the Southern Alternative would disperse to below the National Ambient Air Quality Standards within 643 feet of the construction. This distance is 3 percent of the shortest distance from the Southern Alternative to Pipe Spring National Monument. This effect would be de minimis when viewed from Pipe Spring National Monument.	This is consistent with H-5 Air Quality. Both sections are described slightly differently. Both are accurate
225	H Supplemental Resource Reports	Special Designations	2.3	13	39 to 42	The Highway Alternative effects ignores the number of times this LPP alignment would cross the Old Spanish National Historic Trail (12 times within the separate alignment of the Highway Alternative, stated in Appendix H-21 Visual Resources), in contrast to stating multiple times the Southern Alternative would cross the Old Spanish National Historic Trail six times throughout the 141-mile length of the Southern Alternative. In fact, the Highway Alternative effects section should disclose the number of miles (38.7 miles stated in Appendix H-21 Visual Resources) this LPP alignment would directly affect the foreground of the Old Spanish National Historic Trail, in addition to stating the number of times the Highway Alternative would cross the Old Spanish National Historic Trail.	Comment noted. Change made
226	H Supplemental Resource Reports	Special Designations	2.3.1	14	26	The Highway Alternative should be included in this sentence, especially because the Highway Alternative effects on the Old Spanish National Historic Trail would be far greater in the foreground and middleground compared to the Southern Alternative. In fact, the Old Spanish National Historic Trail roughly parallels the entire segment of the Highway Alternative and would be mostly four miles from the Southern Alternative where the two alternatives have separate alignments.	The cited section deals only with the Highway Alternative, so a reference to the Southern Alternative was incorrect. Text was revised to address only the Highway Alternative.

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227	H Supplemental Resource Reports	Special Designations	2.2	14	1 and 3	The continued sentence in line 1 refers to trails, which is incorrect; this section is specifically discussing the Old Spanish National Historic Trail, not multiple trails. The sentence in line 3 refers to historic trails; this section is specifically discussing the Old Spanish National Historic Trail, not multiple historic trails.	Change made
228	H Supplemental Resource Reports	Special Designations	2.3	14	16 to 17	The statement the LPP alignment proposed under this alternative would be approximately one-half mile from Pipe Spring National Monument is factually incorrect. The Highway Alternative would be 1,000 feet (0.19 mile) from Pipe Spring National Monument.	Change made
229	H Supplemental Resource Reports	Special Designations	2.3	14	20 to 23	The statement regarding fugitive dust generated from construction activities would temporarily affect visibility/views across the Arizona Strip should be amended to include direct effects of fugitive dust on Pipe Spring National Monument because of the prevailing winds from the south and southwest. The statement regarding windblown dust from the unconsolidated pipeline construction area would continue to affect local visibility until vegetation is sufficiently reestablished should be amended to include direct effects of windblown dust on Pipe Spring National Monument because of the prevailing winds from the south and southwest.	We believe the text as written is sufficient. No change made
230	H Supplemental Resource Reports	Special Designations	2.4	16	1	Table 3.4-1 for the Old Spanish National Historic Trail is blank except for No Effect under the No Action Alternative and dashes entered for all other table cells. The effects of the Southern Alternative and the Highway Alternative must be comparatively summarized in this portion of the table. The Highway Alternative effects on the Old Spanish National Historic Trail would be significant and direct for much of this alternative alignment, and indirect effects would have more far more intensity compared to the indirect effects of the Southern Alternative along its separate alignment. Section 2.4 should include a figure or map showing the separate alignments of the Southern Alternative and the Highway Alternative with the Old Spanish National Historic Trail, which would greatly benefit the reader's understanding of the comparative analysis.	This was an oversight and the cells of the table were filled in.
231	H Supplemental Resource Reports	Special Designations	2.4	17	1	Table 3.4-1 for Pipe Spring National Monument includes comparative local visibility effects from fugitive dust for the Southern Alternative and RMPA sub-alternatives, which range from four to eight miles away from the National Monument. Appendix H-5 Air Quality states fugitive dust along the Southern Alternative would disperse to below the National Ambient Air Quality Standards within 643 feet of the construction, which is 3 percent of the distance from the Southern Alternative to Pipe Spring National Monument. This effect would be de minimis when viewed from Pipe Spring National Monument. The table cells for NPS and the Southern Alternative and RMPA alternatives would have no measurable visibility effects from fugitive dust. The table cell for BLM and the Highway Alternative is incorrect; there would be no measurable fugitive dust effect on BLM-administered land from construction of the Highway Alternative, especially considering the fact that the predominant wind direction is from the south and southwest, away from BLM land nearly two miles south of the Highway Alternative.	This was an oversight and the cells of the table were filled in. Information included in the BLM column was due to a misunderstanding of how the table should be completed.
232	H Supplemental Resource Reports	Threatened and Endangered Species	2	30	30	Per previous comments, provide rationale for why one year is the difference between short term and long term impacts.	Professional judgment and experience determined this from a local office. No change needed
233	H Supplemental Resource Reports	Threatened and Endangered Species	2	36	23	Mention that a translocation plan for tortoises may be developed. See the BA for information	Need more specific information...this is on a header

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234	H Supplemental Resource Reports	Threatened and Endangered Species	1.4	NA	NA	Figures showing locations of critical habitat/known range/etc. for the species listed would be helpful for the discussion. Those figures are in the Biological Assessment.	Change can be made if Stantec can pull together the figures. Figures will need to include both alternatives; figures from the BA only included the Southern Alternative, which is why no figure were incorporated.
235	H Supplemental Resource Reports	Threatened and Endangered Species	2			Throughout this section make sure impact determination match what is in the Biological Assessment. Documents should follow the BA determinations as those were developed in close coordination with the agencies.	Thank you for your comment
236	H Supplemental Resource Reports	Threatened and Endangered Species	2			When mentioning acres of impact to habitat, break it out for temporary vs permanent impact.	Thank you for your comment
237	H Supplemental Resource Reports	Transportation	2.1	17	After line 29	The cumulative effects discussion is missing from this section. At a minimum, the reader should be referenced to Appendix H-27 Cumulative Effects, section 3.9 Transportation.	No change needed
238	H Supplemental Resource Reports	Transportation	2.2	25	After line 10	The cumulative effects discussion is missing from this section. At a minimum, the reader should be referenced to Appendix H-27 Cumulative Effects, section 3.9 Transportation.	No change needed
239	H Supplemental Resource Reports	Transportation	2.3	31	After line 36	The cumulative effects discussion is missing from this section. At a minimum, the reader should be referenced to Appendix H-27 Cumulative Effects, section 3.9 Transportation.	No change needed
240	H Supplemental Resource Reports	Vegetation Communities	1.2	4	3-6	Add reference to previous study report	Change made
241	H Supplemental Resource Reports	Vegetation Communities	1.4.26.1	19	22	Define for the reader what "ruderal" means	Ruderal definition will be added to text and to the glossary
242	H Supplemental Resource Reports	Vegetation Communities	2.3.1	25	23	Table numbers don't match up with the text. Use the latest vegetation numbers that were provided.	Change made
243	H Supplemental Resource Reports	Vegetation Communities	Throughout	NA	NA	Please ensure that the first time a specific species is mentioned the scientific name is given. This is a universal comment for the entire DEIS.	Thank you for your comment
244	H Supplemental Resource Reports	Visual Resources	1.3	17	14	The first bullet lists the water treatment facility; there is no water treatment facility proposed as part of the Project	Words removed

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245	H Supplemental Resource Reports	Visual Resources	2.4	57	9 through 17	This paragraph states approximately 50 miles of the Southern Alternative would go through primarily undeveloped areas with natural landscape characteristics, which is incorrectly described. Approximately 11 miles of the Southern Alternative would cross through primarily undeveloped areas with natural landscape characteristics from Highway 89 through White Sage Wash to the Navajo-McCullough 500 kV transmission line corridor. The remaining 41.4 miles of the Southern Alternative (in its separate alignment from the Highway Alternative) would be co-located in the Navajo-McCullough Transmission Line utility corridor and parallel to the transmission line, which is a significant visual intrusion on the landscape with the corridor designated by BLM as VRM Class IV, and parallel to Yellowstone Road for the last six miles to the junction with Highway 389. The Highway Alternative is described as going through only 8 miles of primarily undeveloped areas. The actual difference between the Southern Alternative and the Highway Alternative in alignment across primarily undeveloped areas is three miles. The Southern Alternative would follow existing linear infrastructure to the extent possible and would utilize an existing utility corridor, as suggested by BLM to UDWR, to minimize effects on resources including visual resources. The Highway Alternative would create slightly less visual contrast in an area seen by far more viewers along Highway 389 and Highway 89 compared to the Southern Alternative which would create slightly more visual contrast in an area seen by very few viewers.	Edited and a new paragraph created
246	H Supplemental Resource Reports	Visual Resources	3.18.2.4	107	2	Statements of major adverse visual effects should include a statement that VRM objectives are still met.	Statement added
247	H Supplemental Resource Reports	Water Quality	2.2.3	61	15	Effects to groundwater at Sand Hollow would be minor, but would be there over the course of the life project. Does the "short-term" and "temporary" determination refer to changes in quality at any give moment, or to the duration of time in which slight changes would occur. Some clarification is needed here.	No change needed
248	H Supplemental Resource Reports	Water Quality	2.2.4	62	16	Effects to Lake Powell water quality be negligible to minor, but would be there over the course of the life project. Does the "short-term" and "temporary" determination refer to changes in quality at any give moment, or to the duration of time in which slight changes would occur. Some clarification is needed here.	No change needed
249	H Supplemental Resource Reports	Water Quality	2.2.5	62	19	Effects to Virgin River water quality be negligible to minor, but would be there over the course of the life project. Does the "short-term" and "temporary" determination refer to changes in quality at any give moment, or to the duration of time in which slight changes would occur. Some clarification is needed here.	No change needed
250	H Supplemental Resource Reports	Wetland and Riparian	1.4.1	20	7	Restate or refer to a previous section what the three parameters are.	Change made

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251	I Analysis and Perspective of the Tribe	Ethnographic Resources	LPP BOR App I Supp. 3	General		This report includes describes impacts to areas that are not within the project APEs or within the construction corridor. Many cannot be viewed or accessed from the LPP alignment. Some are no longer included in the project area at all. For example: The Ghost Dance Site is not within either APE and is not visible from either Alternative. It stands to reason the LPP is not visible from this site; the cultural plant habitat area near Hurricane Cliffs was in the area of the hydro system that was removed from the project; the Pioneer Gap area has been entirely avoided by re-alignment of the Southern Alignment and removal of the Kane County distribution line; there is no indication that the LPP will be visible from many of the identified locations; the EIS visual resources section concludes no visual impact at Pipe Spring National Monument. All public depictions of the Salt Song Trail locate this trail well outside any Alternative.	Thank you for your comment.
252	Chapter 3	Aquatic Invasive Species	3.12.2.2	73	3-5	Revise the sentence as follows: "After accounting...the Proposed Project presents a minimal risk to the spread of quagga mussels into Sand Hollow Reservoir, as compared to the risk that recreational boaters pose."	No change needed
253	E Mitigation Measures	Special Designations	2.8.1	5	18	Horizontal directional drilling or jack and bore construction would not be feasible from the top of Kanab Creek Canyon to protect resources within the canyon from construction effects. More extensive tunneling under the Kanab Creek Canyon would require a drain vault and access road that would traverse several hundred feet of the canyon. These features would cause greater environmental and cultural impacts than if we were to do the crossing at it current proposed location.	Removed this mitigation measure
254	E Mitigation Measures	Transportation	2.9.1	6	21	The State cannot commit to restricting construction to non-peak tourist seasons and night-time construction during peak tourist times on all of US. 89. Further discussion is needed to identify specific areas of concerns.	Further discusion needed
255	E Mitigation Measures	Transportation	2.9.2	6	21	Further clarification is needed on what the Kaibab Canyon is on the Highway Alternative.	Made the change
256	E Mitigation Measures	Recreation	2.10.1	7	4-25	Permanent effects on established, official trails or other recreation amenities would be negligible and would not require in-kind replacement. Mitigation involving new or in-kind facilities should not be required. Impacted existing recreation facilities will be restored after construction in those areas are complete.	Removed mitigation measure
257	E Mitigation Measures	Water Quality	2.13.1.2	8	21	Change sentence as follows: "...develop plan that would identify select areas to..."	Unable to find what you're referring to here
258	E Mitigation Measures	Water Quality	2.13.1.2	8	23	Change sentence as follows: "...preserved temporarily by winrowing it along the ROW and it would be used for erosion control."	Unable to find what you're referring to here
259	E Mitigation Measures	Water Quality	2.13.1.2	8	36	This bullet should just reference the dust control measures outlined in the POD, which are referenced in other resources. No need to bring in different language.	Unable to find what you're referring to here
260	E Mitigation Measures	Aquatic Invasive Species	2.14.1	11	16	Change to: "All appropriate decision makers...."	Change made
261	E Mitigation Measures	Aquatic Invasive Species	2.14.1	11	29	WCWCD is not responsible for monitoring and decon of watercraft. Who would be responsible for this measure.	Amended language
262	E Mitigation Measures	Aquatic Invasive Species	2.14.1	14	28	After the first sentence of this paragraph, add the following sentence: However, prior to LPP construction, UDWRe, WCWCD, and applicable agencies will review the AIS Control and Monitoring Plan and determine the precise measures to be implemented.	Change made
263	E Mitigation Measures	Wetland and Riparian	2.16.1	16	4	No wetlands would be affected by the LPP. Delete mitigation related to wetlands.	Change made

Comment #	Chapter No. or Appendix	Resource Category, If Applicable	Section Number or Title	Page Number	Line Number	Comment	Official response
264	E Mitigation Measures	Wetland and Riparian	2.16.1	16	16	Horizontal directional drilling or jack and bore construction would not be feasible from the top of Kanab Creek Canyon to protect resources within the canyon from construction effects. More extensive tunneling under the Kanab Creek Canyon would require a drain vault and access road that would traverse several hundred feet of the canyon. These features would cause greater environmental and cultural impacts than if we were to do the crossing at its current proposed location.	Removed this mitigation measure
265	E Mitigation Measures	Sensitive Species – Fish and Wildlife	2.19.1.4	20	25	The State is not committing to covering or backfilling open trenches, or committing to a limit on length of open trench. These measures, including lighting would not be feasible from a constructability standpoint. The existing EPMs are sufficient to protect wildlife and were previously approved by BLM.	No change made. It is a mitigation measure.
266	E Mitigation Measures	Cultural Resources	2.22.1	23	17	Cultural resource provisions will be described in the HPTPs and should not be prescribed in the EIS.	Change made