Steinaker Canal Rehabilitation
Uintah Water Conservancy District & USBR
Review and Response Comments from Draft EA - February, 2013

Comment Name	Address	Email & Phone #	Date	Comment	Type	Response / Clarification
Kenneth Finley			Feb-14	Just in case you want that water for Las Vegas or for a nucluar power plant the answer is no, and I will fight you all the way to the U.S. Supreme Court. That water was made for the farmers and ranchers, period.	Public	The water will continue to be used for irrigation within Ashley Valley.
Cady Johnson	1339 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Can you provide a link or electronic copy of the Biological Assessment referenced on page 1 of the DEA? Also, page 16 is missing from DNR's online copy of the Hood's (1977) Hydrologic Evaluation of Ashley Valley; do you have it?	Public	(Provided by Kerry via email) Thank you for your interest in this project. Attached is a copy of the Biological Assessment (BA) referenced on page 1 of the Draft Environmental Assessment. Also attached is an appendix to the BA. Please be aware that the BA is subject to change as we complete the Section 7 consultation process with the US Fish and Wildlife Service and complete the Final Environmental Assessment (of which the BA was an attachment). If there are changes to the BA we would be happy to provide an updated copy at your request. I have also attached a complete copy of the 1977 James Hood report. Thanks again for your interest in this project. If you have any further questions feel free to contact me.
Cady Johnson	1340 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	No estimate of the cost of the Project is provided, or of the value of natural resources (vegetation and wildlife) that would be lost.	Public	Cost is not part of the analysis of an EA. An analysis of the riparian habitat has been added to the EA.
Cady Johnson	1341 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	The only beneficiaries of the Project identified in the DEA are irrigators in Ashley Valley; downstream users of Colorado River waters would receive the largest benefit. No reference is made to the Intentionally Created Surplus (ICS), a market commodity that would come into existence by enclosure of the Canal, or the manner in which this ICS would benefit Reclamation's priority customers, the Metropolitan Water District (MWD) and Southern Nevada Water Authority (SNWA). There is no discussion or analysis of how urbanization in Ashley Valley has reduced or changed the distribution of farmland, expected future reductions in agricultural activity, or of how irrigation practices have changed over the history of the Central Utah Project and consequent effects on groundwater levels.	Public	The purpose of the project is to save water. This saved water will be kept in the reservoir for irrigation use of the water shareholders. Currently, there is not enough water to supply the existing water rights of Ashley Valley, therefore, there is no surplus water to be released anywhere other than Ashley Valley. The Metropolitan Water District and the Southern Nevada Water Authority do not receive water from this reservoir nor the Steinaker Canal; they receive their water from the Colorado River miles downstream from Vernal. Therefore, an analysis of their benefit is not applicable. There is no intention to create surplus and sell water downstream. As development has occurred in the southern portions of the valley the distribution of the canal has changed over the years to provide in the lower reaches of the canal. There has also been a conversation from open irrigation to sprinklers over the years, but analysis of this distribution does not benefit the purpose of enclosing the canal. How people use the irrigation water is not part of the analysis of the EA.
Cady Johnson	1342 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.1, Page 1: No citation or link to the referenced Biological Assessment is provided.	Public	Provided by Kerry via email to Cady.
Cady Johnson	1343 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.2, Page 2: Assuming a 20-foot width, the surface area of the Canal is about 28 acres; this is less than 0.2% of the irrigated acreage. Therefore, evaporation from the free water surface of the Canal is a non-issue.	Public	It may not a big issue, but one that should be stated.
Cady Johnson	1344 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Table 1-1, Page 3: The monthly flows (as acre-feet) do not correspond with flow rates expressed as cubic feet per second (cfs); the cfs data are erroneous (much too low). Measurement methodology and uncertainty are not given. The "106.9%" value in the % Loss column is meaningless. There is no accounting for theft of water or leakage at the turnouts.	Public	The CFS calculations have been updated and replaced in the EA. Accounting for theft of water or leakage at each turn-out is not practical or attainable. By enclosing the canal, it will be easier to control water theft and leakage because it will be within a controlled system.
Cady Johnson	1345 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.3.2, Page 3: "unauthorized storm water inflows" is undefined; the Canal was designed with storm runoff routed under through siphons, over through pipes, and into it through culverts in the embankment. The disposition of these conveyances, particularly the culverts that drain to the Canal, is not explained in the DEA.	Public	The project is routing the natural drainages across the canal to continue to flow as is, prior to the construction of this project. Unnatural, manmade drainages will be handled via drainage swales. The upper canal also intercepts water from upstream users and will continue to do so regardless of the enclosure of the Steinaker Service Canal.
Cady Johnson	1346 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.3.3, Page 4: "unauthorized recreational activities" are a quality-of-life asset to the Vernal community, and have received tacit approval since gates are not maintained or kept locked over much of the right-of-way. There are no known instances of injury related to entry into the open water, or of legal action against people making float trips.	Public	The gates remain unlocked for maintenance ease. If the gates are unlocked, it does not mean trespassing is allowed. As per verbal conversations with Uintah Water Conservancy District, fatalities have occurred within the canal.
Cady Johnson	1347 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec 1.3.4, Page 4: If leak monitoring has been conducted, no data are provided. It is improbable that leakage from the Canal is uniform along its length, and effective leak monitoring should allow leaky segments to be identified and repaired, a far more efficient conservation strategy than enclosing the entire Canal.	Public	Repairs of the canal does not take care of the purpose and need for the project. Leaks are not the only factor to enclosing the canal.

Cady Johnson	1348 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.4, Page 4: The public comment tables in Appendix E are illegible in the online version of the DEA.	Public	Comment noted.
Cady Johnson	1349 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sec. 1.7, Page 6: The DEA falls far short, in terms of providing basic data and interpretations, of supporting a Finding of No Significant Impact (FONSI) to the human environment. Vegetation, wildlife, the viewscape, surface drainage, and recreational opportunities would all be negatively impacted for the benefit of a few irrigators. The retention of conserved waters in Ashley Valley cannot be guaranteed, given the ICS that would by definition exist if the enclosure Project is allowed to proceed.	Public	These items are either covered in the EA or outside the scope of the project.
Cady Johnson	1350 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 2.1, Page 7: The cited 25,675 acre-feet delivered over 6 growing months of the year is misleading, as are the monthly averages given in Table 1-1. Data are missing for the months of May, June, and October of 2005, and 5 months is more representative of the duration of Canal activity in any given year. Historically (2006-2011), the average of about 6,000 acre-feet conveyed monthly from June through August declines to 3,500 acre-feet in September. Accepting (from Section 1.2) that 14,781 acres are irrigated, a monthly supply of 6,000 acre-feet/14,781 acres = 0.41 feet of water is available to irrigated lands in Ashley Valley from June through August. Decreased flows in September are presumably due to depletion of Storage in Steinaker Reservoir, and the mid-summer flow rates might be sustained somewhat longer by conservation measures. In round numbers, 15% savings during the first 4 months of the irrigation season would provide an additional 3,600 acre-feet of storage in Steinaker Reservoir, which could extend irrigation water availability at the mid-summer rate for 2-3 weeks at the end of the irrigation season, when evapotranspiration and therefore water demand is much less than during mid-summer. The economic justification for this strategy is absent in the DEA.	Public	The data refereced is actual flow data that was recorded. June 2005 was a wet year and water was likely not released into the canal because there was no need. The saved water will be used by the irrigators. By saving the water, the irrigation season may be extended or remain in the Steinaker Reservoir. Economic analysis is not part of this project. Reducing the irrigation season does not meet the purpose and need of the project.
Cady Johnson	1351 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Sections 2.2 and 2.3, Page 7: The binary choice between the "No Action" and "Preferred" alternatives is flawed; repair of leaky Canal segments should be considered as an alternative action. Section 2.5, Pages 15-16: ditto; targeted repair of Canal segments was not considered.	Public	A leaky canal alone does not meet the purpose and need of the project.
Cady Johnson	1352 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 3.3.2, Pages 18-19: The "analysis for groundwater resources" is extraordinarily weak, containing no quantitative analysis of water-level responses to Canal filling, gainloss studies along the Canal, or well-hydraulics analyses. Opportunities for obtaining large-scale estimates of basin-fill transmissivity and storage, and leakage rates through the resistance layer (clay liner) from a line-source model have been overlooked. Hydrochemical data are absent, preventing mass-balance cross-checks of leakage rates obtained by other methods to be derived. No estimates of crop distribution, associated water demand, or evapotranspiration are provided.	Public	No water has been recorded in the canal when the water from the reservoir is turned off. A geotechnical report for the design of the lower segment indicated that groundwater is approximately 5' below the flow line of the canal. The geotechnical report was conducted when the canal did not have water. This is evidence that groundwater exists without the canal. The best available data was used in the analysis of groundwater. A model has not been conducted for groundwater and is outside the scope of the project.
Cady Johnson	1353 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 3.3.11, Page 29: No data is provided from the "test holes" used to determine soil conditions. The referenced Figure 7 is illegible with respect to identifying riparian areas created by Canal seepage, and no such areas are identified in the Legend for Figure 7.	Public	Test holes are part of the wetland analysis. Wetland test holes are at a depth of 10-16-inches to evaluate hydric soils as per the Corps of Engineers requirements. These test holes were not groundwater test holes. The riparian corridor identified outside, but adjacent to the canal right-of-way is located between the Ashley Upper Canal and the Steinaker Canal and other natural drainages that intersect the canal. An explanation and mitigation measures have been added to the EA.
Cady Johnson	1354 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	The referenced Figure 9 shows about 3.2 acres of wetlands associated with seepage from the Canal, but no estimate of the seepage flux sustaining these wetlands is given.	Public	Not applicable.
Cady Johnson	1355 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 3.3.12, Pages 29-30: The value to the community of walking, jogging, and bicycling access to the Canal roads is not estimated.	Public	The purpose of the canal is not to provide recreational opportunities, therefore, unauthorized benefits for recreation is not part of this analysis.

Cady Johnson	1356 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 3.4.2.2, Page 32: "The impact to groundwater supplies as a result of virtual elimination of (Canal) seepage is unknown" and "The extent of effects on the wells is unknown at this time". A significant lack of understanding of the coupled surface-water / groundwater system is indicated by these statements. Current best practice in engineering hydrology is that impact assessments, which here are pure assertion and unsupported by data or analyses, should be based on a groundwater model. The model should benefit from sufficiently long and representative calibration and validation periods, and should include a sensitivity analysis to illustrate how parameter uncertainty affects model outcomes.	Public	The study of the water is for the purpose of it's use, irrigation water. There are water rights associated with the Steinaker Service Canal. Benefits of leaks to the groundwater are a mute point. The water is intended to benefit the irrigators. Groundwater will continue to exist regarless of whether this project is piped or not. The best available data was used in the analysis of groundwater. Creating a groundwater model is not required to be developed as part of the EA process for this project.
Cady Johnson	1357 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 3.4.12.2, Page 36: The first statement is false. Continued reference to an "unauthorized" trail corridor reflects an indifference to the needs and preferences of the Vernal community, which values the Canal corridor as an aesthetic resource.	Public	Trail users would be tresspassing,therefore, it is an unauthorized use.
Cady Johnson	1358 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Section 5.2, Page 42: The "open house" was a waste of time, being unstructured in terms of providing for formal presentations and rebuttals. USBR provided only a few aerial photographs, cookies and punch, and absolutely no hard data or analyses. Answers to specific questions were vague and seemed at times evasive, particularly when questions relating to export of ICS water were raised.	Public	The purpose of the open house was to make the public aware of the project. Thank you for attending and providing your initial feedback.
Cady Johnson	1359 W 1500 S Vernal, UT 84078	iready@yahoo.com	11-Jan-14	Conclusion It is clear that the hydrology of Ashley Valley is not completely understood. No one really knows the impact of the proposed Canal enclosure on established phreatophyte (cottonwood, willow, box elder, poplar) trees and riparian vegetation, since the extent of water-table lowering has not been analyzed. The ability of these species to continue their natural germination and growth cycles is being put at unknown risk. The EA offers no monitoring, management, and mitigation strategy to address hydrologic impacts in Ashley Valley. There are no objective standards provided to determine when mitigation would be required and implemented. The DEA is inadequate to support a Finding Of No Significant impact (FONSI), given the weak to nonexistent hydrologic and economic analysis therein. Key water management and market issues are completely avoided, particularly the implications of an intentionally created surplus (ICS) and how export of water from Ashley Valley would be facilitated by this proposal as required by Reclamation's mission. These deficiencies and risks to the public welfare from an inefficient and ill-advised expenditure of public funds to address a non-existent need to conserve low-priority waters indicate that the DEA should be abandoned in favor of an Environmental Impact Statement, which requires far more rigorous analysis than an EA. The Proposal as represented in the DEA is subjective, unscientific, arbitrary, and capricious.	Public	Comment noted.
Misty Monfredi		jmmonfredi@ubtanet.com	11-Jan-14	I am writing to you in regards to the Steinaker Service canal modification. I know that other canals in the state have undergone a similar modification. As part of those other modifications walking and biking trails were constructed on top of the canal. I am in favor of a walking/ biking trail being constructed on top of the canal here in Vernal as well.	Public	Thank you for the comment. Reclamation is not considering a trail for this project. The development of a trail would be under the direction of another agency or the city/county if they desire a trail.
Randy and Larenda Richards	1175 North 1500 West 1183 North 1500 West 1221 North 1500 West	ldrsweet1360@gmail.com	21-Jan-14	Our concern is for the spring water that supplies culinary water to two homes. We have relied on this water source for more than 50 years. Will modifying the canal effect our water source? And will it effect the wet lands located at 1500 West? By continuing enclosing open canals that were established years ago, will it effect wells in the areas or the wet lands that are currently in use? Has there been test done? If it will effect these things we are opposed to the modifying of said canal. If our spring water is effected and we have to replace with city water and irrigation water, We would have to be compensated for this lose of water source.	Public	Peter Crookston with Reclamation has left the Richard's phone messages to discuss their concerns.
Uintah County Commission Michael McKee Darlene R. Burns Mark D. Raymond		mmckee@uintah.utah.gov	29-Jan-14	Uintah county believes that the enclosing of this canal is a great conservation project nd is very supportive. Enclosing the Stinaker Canal should lead to significant water savings. In additon, the potential exists for the enclosed canal to become recreationally used as a future hike and bike-way. The only concern we might have is that Uintah County is planning an alternate truck bypass route which will travel south of the Vernal ara. The exact route has not yet been determined. Where the canal currently exists and it not expected to extend any further south, we do not believe that will be a negative impact.	Public	Comment noted.

Thomas and Dani Jenkins	1068 South 1500 West Vernal, UT 84078		3-Feb-14	We the undersigned are opposed to teh Stinaker Service Canal Modivation Project. Believing the drawbacks will greatly out way the benefits. Enclsing the canal will take away open use of the canal by wildilfe and stock. There are many fowl that use the canal to have and raise their young upon. Deer and other wildlife use it for watering. It will also be desfructive to the trees and vegetation along the canal. With fewer farmers and less irrigated land , enclosing the canal will leave a wake of destruction in its path. Leaving our once green and shaded valley into a dry and desolate landscape. The canal now serves its purpose of delivering water for irrigation. Also allowing trees and vegetation to grow along its banks. Yes, there may be a loss of water due to subbing, but how do you call it a loss when you still have the vegetation and underground springs that it feeds? We cannot always expect to only take from mother nature and not give back.	Public	Comments have been analyzed in the EA. Comments noted.
Lewis Craig Massey		craig-massey@hotmail.com	6-Jan-14	My name is Lewis Craig Massey. My wife Cheryl and I have land that the Steinaker Service Canal runs through. Due to work and other personal obligations I was unable to attend the public scoping meeting held here in Vernal on June 18, 2013. I have a few concerns regarding this project. My main concern is what will be done with any slash or other rubble or trash that may be left after the pressurized pipe has been put down and covered up. Will it be cleaned up and removed? Will the pipe be laid down in the existing canal bed? If not are there plans for any reclamation of the old canal bed? If any existing fences, barns, or sheds are removed or damaged will they be repaired?	Public	Reclamation had a conversation with Mr. Massey and explained that debris will be removed after construction.
Fred Hardman	3826 Sover Ave Vernal, Utah 84078		24-Jan-14	You say you want to enclose the canal for conservation and environmental reasons. I woner what adverse effects it will have on the environment. You also say you want to make a pathway for walking and bicycles. That's one thing, a two lane highway is something else. A road for cars, trucks, four wheelers, pick-ups, horse trailers and dirt bikes. We live next to the canal. We have to contend with that already. We don't want to have to put up with more of it. Cars, four wheelers, dirt bikes, instead of doing 25 miles an hour, doing forty or fifty.	Public	A highway is not proposed as part of this project. Recreational use is outside the scope of this EA.
Larry Crist U.S. Dept. of the Interior Fish & Wildlife Service	2369 W Orton Circle, Suite 50 West Valley City, UT 84119	801-975-3330	31-Jan-14	Letter dated January 31, 2014	Agency	Comments noted. Mitigation measures have been added to the EA.