



United States Department of the Interior

NATIONAL PARK SERVICE

Colorado River Coordination
324 South State Street, Suite 200
Salt Lake City, UT 84111

IN REPLY REFER TO:

LPP

July 5, 2011

Hon. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: NPS Study Report Comments - FERC PROJECT # P-12966

The National Park Service has reviewed the Initial Study Reports submitted by the Utah Board of Water Resources for the Lake Powell Hydroelectric System dated March 14, 2011 (FERC Project # P-12966). The following summary comments are submitted by the NPS for Glen Canyon National Recreation Area, Grand Canyon National Park, and Lake Mead National Recreation Area and augment previous NPS input:

1. Surface Water Quality and Surface Water Resources, draft study reports 17 and 18. In general the reports should more completely quantify impacts to lakes Powell and Mead, and the Colorado and Virgin rivers. It is insufficient to conclude significance without such quantitative estimates. Further, the reports must extend the analyses to include possible severe future hydrologic conditions within the Colorado River watershed (extremely low inflow and lake level conditions as would be seen when withdrawing water from the lowest intake level of the withdrawal structure). More detailed comments are attached.
 - a. Specify more clearly the levels of water re-use anticipated
 - b. Describe the supporting infrastructure necessary to meet the stated target of no net additional discharges to the Virgin River.

- c. Monitoring, mitigation, adaptive management necessary if the assumptions concerning future water re-use targets are not met
 - d. Clarify whether the infrastructure requirements needed to achieve no net additional discharge into the Virgin River are part of each of the action alternatives
 - e. Is the additional infrastructure alluded to in the reports intended to be a commitment by UDWR (mitigation measure)? If so, the environmental effects should be described.
 - f. Describe the assumptions built into the water quality modeling and analyses made in the report for Lake Powell and the Colorado River. It appears as though average inflow and lake level projections are used to project no measurable or “significant” effects. The analysis should specify water quality effects to Lake Powell and the Colorado River during extreme drought/climate change, reservoir drawdown, including cumulative effects
 - g. Specify the annual return flow volumes into the Virgin River due to water reuse.
 - h. Estimate the effect of these return flow volumes on the Virgin River and Lake Mead water quality during times of excessive drought and low water conditions, including cumulative effects
 - i. Specify the proposed quagga mussel monitoring program for Lake Powell (to determine whether to implement control procedures)
 - j. Quantify the “significant” impacts to the Virgin River due to the No Lake Powell Water Alternative
 - k. Specify how water will be withdrawn and the water quality expected from the lowest withdrawal level of the intake structure
 - l. Certify/discuss agreements regarding water withdrawal at the lowest level of the Lake Powell water intake structure
2. Archaeological and Historic-Era Resources Study Report 3. Given the preliminary information recently received through the ethnographic study, this study report should be reevaluated, generally, for completeness as exemplified below:
- a. On page 3 of the document "Initial Study Report Meeting," disciplinary reports are summarized. For the report on "Archeological and Historical Resources" it identifies that agencies/tribes are still commenting on the preliminary Class III, as well as the addendum. Please note that we completed our review of these documents and submitted them in January 2011.
 - b. The summary statement suggests there is still an opportunity to include additional information into that report - or the ethnography report expected in July 2011. Given that both Zuni and Hopi have identified the Colorado River as a Traditional Cultural Property (TCP), this information should be included in either the archeological or ethnographic report. The Section 106 regulations articulate that the federal agency has a responsibility to identify effects on historic properties that include TCPs. The National Park Service (NPS) will follow up as appropriate on these tribal recommendations in the areas that they affect NPS-managed properties. We suggest that the TCP be included in one of the reports and that the effects of the pipeline on that particular type of historic property be identified/discussed

The above comments are provided to respond to the study reports recently prepared by UDWR in response to the original FERC approved study plans. These reports are premised on certain assumptions about the project purpose and need and alternatives to be included in the final EIS. As these features become better clarified, additional analysis may be necessary.

We appreciate the opportunity to work cooperatively with FERC and the Utah Board on this project.

Sincerely,

John Wessels
IMR Regional Director