

State of Utah

DEPARTMENT OF NATURAL RESOURCES

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March 31, 2017

FERC Project No. P-12966-004 Lake Powell Pipeline Project Utah Board of Water Resources

Hon. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 1st Street, N.E. Washington, D.C. 20426

Subject: Lake Powell Pipeline Project, FERC Project No. P-12966-004

Submission of Responses to Department of the Interior Agency Comments

Filed via Electronic Submittal (E-File)

Dear Secretary Bose,

The Utah Board of Water Resources (UBWR), through its representative, Utah Division of Water Resources (UDWRe), has prepared responses to Bureau of Land Management (BLM) and National Park Service (NPS) comments on license application documents filed with the Commission in 2016. The responses to comments being filed herein represent errata to UDWRe's final license application filed on May 2, 2016, and supplemented on June 2, 2016.

UDWRe appreciates the efforts of BLM, NPS and Reclamation in participating in the LPP licensing process to date. UDWRe is committed to working with BLM, NPS, Reclamation and other agencies with land management and/or regulatory responsibilities in fulfilling their obligations in this licensing proceeding. UDWRe responded to hundreds of comments from the Department of the Interior agencies to date but there were 242 remaining BLM comment responses that BLM considered inadequate and 115 new comments from NPS on the Final License Application (FLA) submittals. In the course of completing all responses to BLM and NPS comments, UDWRe and its consultant team met with BLM and NPS and also had several follow up communications as well as provided responses to each agency for review and additional comment, if they were able to and desired to by March 31st. UDWRe met with NPS representatives on February 1, 2017 and BLM representatives on March 17, 2017. These meetings and subsequent reviews provided an additional opportunity to have interactive dialogs regarding the comments and responses, which in turn allowed UDWRe to provide more thorough responses. To date UDWRe has received BLM input on about half of the submitted responses and received input from NPS on most of the submitted responses delivered to NPS. It is UDWRe's understanding that BLM will and NPS may have further input in the next few weeks on some topics relevant to the comment responses. UDWRe will work with those agencies to to help ensure their input is provided to FERC as soon as possible.

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The responses to comments are assembled into two comprehensive documents sorted by agency and included in this filing. Each comment and corresponding response has been assigned an identification number entered into a master table and the master tables contain complete responses for most comments. For those comments that required longer responses or included more extensive clarifications to the licensing documents, a longer narrative section follows the master table presentation. Responses with bold text represent actual revisions made to the License Application filed with FERC. The remainder of the responses that are not in bold text are also errata to the final licensing documents; however those responses represent supplemental information that helps provide further clarifications or additional information about a topic.

UDWRe is committed to assisting BLM, NPS and Reclamation in fulfilling information needs for completing the regulatory processes leading to approvals for the LPP and associated rights-of-way on lands administered by the Department of the Interior agencies. We expect that FERC and its NEPA contractor will find these errata and clarifications useful to understand UDWRe's final licensing proposal and Department of the Interior agency needs.

If you have any questions concerning this submission, please contact Joel Williams, UDWRe Project Manager at (801) 538-7249. As appropriate, we look forward to further assisting FERC and the other action agencies, in developing a comprehensive Environmental Impact Statement (EIS) that serves the needs of all agencies. It is our understanding that Department of the Interior agencies will be communicating with FERC in near future regarding the EIS and expect to have the opportunity to fully engage with FERC in developing the EIS documents.

Sincerely,

Eric L. Millis, P.E.

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Director

ELM/bdl

Attachments - BLM and NPS Comment Response Documents