

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Utah Board of Water Resources) Docket No. P-12966-000
) Docket No. P-12966-004
Lake Powell Pipeline Project)

**SAVE THE COLORADO MOTION TO INTERVENE IN THE ORIGINAL LICENSING FOR THE LAKE
POWELL PIPELINE PROJECT**

Pursuant to 18 C.F.R. § 385.214 and the “Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protests, Ready for Environmental Analysis, and Soliciting Comments, Recommendations, Terms and Conditions, and Prescriptions,” eLibrary no. 20171211-3022 (Dec. 11, 2017), as modified by the “Notice Suspending Procedural Schedule,” eLibrary no. 20180111-3085 (Jan. 11, 2018), Save The Colorado (STC) hereby moves to intervene in the licensing proceeding for the Utah Board of Water Resources’ (Utah) proposed Lake Powell Pipeline (LPP) Project (docket number P-12966). Save The Colorado intends to submit comments and recommendations relevant to the Federal Energy Regulatory Commission’s (FERC) and Cooperating Agencies’ environmental analysis at a later date.

I. COMMUNICATIONS

All correspondence, communications, pleadings, and other documents relating to this proceeding should be served upon the following Save The Colorado representative:

Gary Wockner
Save The Colorado
PO Box 1066
Fort Collins, CO 80522
Phone: 970-218-8310
Email: Gary@SaveTheColorado.org

II. INTERESTS OF INTERVENOR

Save the Colorado's Intervention is Appropriate and in the Public Interest

Save the Colorado is a non-profit corporation based in Fort Collins, Colorado. Its mission is to protect and restore the Colorado River and its tributaries from the river's source to the sea.

Save the Colorado has an interest and concern in fighting irresponsible water projects, such as the LPP, in supporting alternatives to proposed dams and diversions on the Colorado River System, in supporting river and fish species restoration, and in fighting for policies that acknowledge and adapt to Climate Change. Save The Colorado has thousands of supporters throughout the Southwest U.S. from Denver to Los Angeles and beyond, including in the states of Utah and Arizona.

Many Save The Colorado supporters live near the Colorado River and rely on the river for recreation opportunities and livelihoods.

Save The Colorado and its supporters oppose the issuance of this license for a number of reasons. This pipeline represents irresponsible water planning in the Colorado River Basin, the project proponents do not have sufficient need for the project and the project is likely to damage ecosystems and species, hamper restoration efforts and exacerbate effects of climate change on the system.

Pursuant to 18 C.F.R. § 385.214(b)(2)(iii), intervention by Save The Colorado is in the public interest. Save The Colorado represents supporters of diverse backgrounds throughout the Colorado River Basin. Save The Colorado has a specific interest in protecting, restoring and enjoying the river and the fish, wildlife and plants that depend on it. Many supporters rely on the river for their recreational, scientific, education, conservation and economic interests. The LPP would directly affect these interests. No other party will adequately represent these same interests.

In addition, Save The Colorado has special knowledge regarding water pipeline impacts because it has participated in federal environmental review processes for other pipelines and diversion projects on the Colorado River, including, providing extensive comments to the final Environmental Impact Statements, and in the FERC proceedings, for the Moffat Collection

Systems Project (Moffat) which includes the Gross Reservoir Hydroelectric Project, FERC Project No. P-2035. Save The Colorado also engaged in extensive public dialogue around the Wyco Power and Water, Inc., Preliminary Permit Application for Regional Water Supply Project, FERC Project No. P-14263, which would have pumped water from Flaming Gorge Reservoir to the Front Range. Save The Colorado also recently protested the Water Horse Resources LLC application to the Utah State Engineer's office, which also is a proposed hydropower project using large water pipelines. All of these projects do, or did, involve large water supply pipelines in the Upper Colorado River Basin, hydropower development and involvement of multiple federal agencies. Moreover, these projects have similar adverse effects on fish, wildlife and plants, including endangered species and their habitats, water availability and recreation on the Colorado River and surrounding public lands. Save The Colorado has developed knowledge and relevant experience regarding water pipeline and hydroelectric projects that will benefit the public interest in the LPP proceedings.

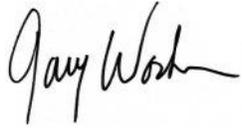
Save The Colorado will actively participate in this license application process and in any subsequent proceeding to ensure the protection of the Colorado River, adequate stream flows, and the protection of the fish, wildlife and plant species that depend on these flows. This participation will lead to more informed decision making, development of a more complete record and be in the public interest. Accordingly, Save The Colorado requests intervention on behalf of themselves and their supporters.

III. CONCLUSION

Save The Colorado respectfully requests that its Motion to Intervene in this proceeding be granted.

Dated November 15, 2018

Respectfully submitted,

A handwritten signature in black ink that reads "Gary Wockner". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Wockner".

Gary Wockner
Executive Director
Save The Colorado
PO Box 1066
Fort Collins, CO 80522
970-218-8310
Gary@SaveTheColorado.org

DECLARATION OF SERVICE

Utah Department of Water Resources, Division of Water Resources,
Lake Powell Pipeline Project (P-12966)

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I, Gary Wockner, hereby certify on this 15th day of November, 2018, that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.



Gary Wockner
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