

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Utah Board of Water Resources,)
Lake Powell Pipeline Project)

Project No. P-12966-005

MOTION TO INTERVENE OF PINAL COUNTY

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, 18 C.F.R. §§ 385.212 and 385.219 (2008), Pinal County hereby respectfully submits this motion to intervene in the above-captioned proceeding. In support of this motion, Pinal County States the following:

I. PINAL COUNTY’S INTEREST IN THE PROCEEDING

Pinal County is a political subdivision of the State of Arizona. Many Pinal County residents are farmers who receive water from the Central Arizona Project (“CAP”). This water comes from the Colorado River system of which Lake Powell is a part. Farming is a significant part of the local economy in Pinal County; and impacts to local farming will affect all Pinal County citizens as well as tax receipts to county government. Water levels at Lake Mead, which receives flows from Lake Powell are close reaching the level at which water curtailments will be imposed.¹ Curtailments of water to the CAP will result in curtailments of water to Pinal County farmers. Pinal County is concerned that large diversions of water from Lake Powell, such as the one being considered here, could cause

¹ 1075 ft.

or contribute to water level decline in Lake Mead which will lead to water curtailments to Pinal County farmers and other water users sooner than they would otherwise occur. Pinal County will be substantially and directly affected by this proceeding and its participation in these proceedings is in the public interest.

II. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications regarding this matter should be addressed to:

Kevin Costello
Deputy County Attorney
Pinal County Attorney's Office
P.O. Box 887
Florence, AZ 85132
Kevin.costello@pinalcountyaz.gov
(520) 866-6270

III. CONCLUSION

Wherefore, Pinal County by and through undersigned counsel, respectfully requests that the Commission grant its Motion to Intervene as a party with full rights to participate in all further proceedings.

RESPECTFULLY SUBMITTED this 30th day of August, 2018

KENT VOLKMER
PINAL COUNTY ATTORNEY



Kevin Costello
Deputy County Attorney

Original e-filed

On August 30th, 2018, with:

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Copies mailed/emailed

On August 30th, 2018, to:

Julie Gantenbein
Staff Attorney
2140 Shattuck Avenue, Ste. 801
Berkeley, California 94704-1229
jgantenbein@waterpowerlaw.com

Matt Rice
American Rivers
1536 Wynkoop Street
Denver, Colorado 80202
mrice@americanrivers.org

Ann Valdo Howard
*Arizona Historic Preservation
Office*
1300 W. Washington St.
Phoenix, Arizona 85007

James W. Garrison
*Arizona Historic Preservation
Office*
1300 W. Washington St.
Phoenix, Arizona 85007

Robin Silver
*Co-Founder and Board Member
Center for Biological Diversity*
P.O. Box 39629
Flagstaff, Arizona 85069-9629
rsilver@biologicaldiversity.org

Lisa Belenky
*Staff Attorney
Center for Biological Diversity*
1095 Market St., Suite 511
San Francisco, California 94103
lbelenky@biologicaldiversity.org

Robert Lynch
Attorney at Law
Robert S. Lynch & Associates
340 E. Palm Lane
Suite 140
Phoenix, ARIZONA 85004-4603
rslynch@rslynchaty.com

Jay Johnson
*General Counsel
CENTRAL ARIZONA PROJECT*
23636 N 7th Street
Phoenix, Arizona 85024
jjohnson@cap-az.com

Richard Roos-Collins
*Director, Legal Services
Natural Heritage Institute*
2140 Shattuck Avenue, Ste. 801
Berkeley, California 94704-1229
rrcollins@waterpowerlaw.com

Paul Van Dam
*Executive Director
Citizens for Dixie's Future*
PO Box 161
Hurricane, California 84737
paul@citizensfordixie.org

Bryan T Hill
*General Manager
Page Electric Utility*
PO Box 1955
Page, 86040-1955
bryan@pageazpower.com

James Rhodes
Jennings, Strouss & Salmon, P.L.C.
201 E Washington St Fl 11
Phoenix, Arizona 85004
srhodes@jsslaw.com

Alice Walker
McElroy, Meyer, Walker & Condon, P.C.
1007 Pearl St Ste 220
Boulder, Colorado 80302
awalker@mmwclaw.com

Gregg de Bie
Associate Attorney
McElroy, Meyer, Walker & Condon, P.C.
1007 Pearl Street, Suite 220
Boulder, Colorado 80302
gdebie@mmwclaw.com

John Weisheit
PO Box 466
Moab, Utah 84532-0466
john@livingrivers.org

Gary Wockner
Executive Director
PO Box 1066
Fort Collins, COLORADO 80522
gary@savethecolorado.org

Wayne Y. Hoskisson
Chair
Sierra Club - Utah Chapter
2159 South 700 East
Suite 210
Salt Lake City, UTAH 84106
wyh@xmission.com

Holly Cheong
AICP
Southern Nevada Water Authority
PO Box 99956
Las Vegas, 89193-9956

John Clements
Van Ness Feldman, LLP
1050 Thomas Jefferson Street, NW
WashingtonD, District Of Columbia 20007
jhc@vnf.com

Eric Millis
P.E.
Utah Division of Water Resources
1549 W. North Temple
Salt Lake City, UTAH 84116

Zachary Frankel
Executive Director, Utah Rivers Council
1055 East 2100 South, Ste. 204
Salt Lake City, Utah 84106
zach@utahrivers.org

Lori Hunsaker
Utah State History Preservation Office
300 Rio Grande
Salt Lake City, Utah 84101

Wilson Martin
Utah State History Preservation Office
300 Rio Grande
Salt Lake City, Utah 84101

Michael Swiger
Partner, Van Ness Feldman, LLP
1050 Thomas Jefferson Street, NW
7th Floor
Washington, District Of Columbia 20007
UNITED STATES
mas@vnf.com

Barbara Hjelle
*Washington County Water
Conservancy Dist.*
136 North 100 East
St. George, UTAH 84770
bhjelle@utah.gov

Robert Harris
Western Resource Advocates
2260 Baseline Road, Ste. 200
Boulder, COLORADO 80302
rharris@westernresources.org

Copies emailed:

jgantenbein@waterpowerlaw.com
mrice@americanrivers.org
rsilver@biologicaldiversity.org
lbelenky@biologicaldiversity.org
rslynch@rslynchaty.com
jjohnson@cap-az.com
rrcollins@waterpowerlaw.com
paul@citizensfordixie.org
bryan@pageazpower.com
srhodes@jsslaw.com
awalker@mmwclaw.com
gdebie@mmwclaw.com
john@livingrivers.org
gary@savethecolorado.org
wyh@xmission.com
jhc@vnf.com
zach@utahrivers.org
mas@vnf.com
bhjelle@utah.gov
rharris@westernresources.org

By: 