

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

\_\_\_\_\_)  
Utah Board of Water Resources, )  
Lake Powell Pipeline Project ) P-12966-001  
\_\_\_\_\_)

**LAKE POWELL PIPELINE COALITION’S COMMENTS ON REVISED STUDY  
PLAN**

The Lake Powell Pipeline Coalition (Coalition) hereby comments on the Utah Board of Water Resources’ (UBWR) “Revised Study Plan” for the Lake Powell Pipeline Project, eLibrary no. 20081222-5008 (Dec. 22, 2008), including attachments.

The Coalition consists of Citizens for Dixie's Future, American Rivers, Glen Canyon Institute, Grand Canyon Wildlands Council, Living Rivers - Colorado Riverkeeper, Sierra Club, the Town of Springdale, Utah, and Western Resource Advocates. The descriptions and interests of member groups are stated in our SD1 Scoping Comments (July 7, 2008), e-Library no. 20080707-5206.

These comments are organized into three sections. Section I comments on UBWR’s Revised Study Plan. Section II replies to UBWR’s Attachment B, Responses to Comments on Proposed Study Plan. Section III comments on the “Lake Powell Pipeline Hydrologic Modeling” (unnumbered attachment following Attachment B) (“Hydrologic Modeling Attachment”).

**I.  
COMMENTS ON THE REVISED STUDY PLAN**

We appreciate UBWR’s consideration of issues raised during the draft study plan process, and are pleased that a number of our recommendations were integrated into the study plans. However, we have substantial continuing concerns about the proposed approach to hydrologic modeling, which will of course influence the study of downstream and other environmental impacts.

For ease of reference, we show proposed changes to the document text in ***bold italicized text***. Our comments track the title and outline number in these documents for each section where we have a comment.

**Study Plan 2:  
Aquatic Resources**

**2.3. Agency Resource Management Goals (§5.11(d)(2))**

We recommend *deleting* the statement: “~~while the proposed Project is not currently anticipated to significantly alter the aquatic habitat or fishery of either the Colorado River and the Virgin River drainage.~~” UBWR may not reach such a conclusion prior to completion of the studies.

**2.4.1 Study Area**

We recommend adding the following *revision*:

*Downstream impacts will be included in the analysis, based on modeling of climate change and other depletion scenarios.*

**2.6.2 Analyze Impacts**

We recommend *deleting a portion of bullet point two*: “~~Significant impacts are not expected to occur on any aquatic species as a result of the project.~~” UBWR may not reach such a conclusion in advance of climate change modeling.

**Study Plan 6:  
Land Use Plans and Conflicts**

**6.3.1.2 Wild Lands**

We recommend adding the following *revision*:

*Indirect and cumulative impacts will be included in the analysis.*

The electric infrastructure along the pipeline route will change the character of scenic open space lands (world-class wildlands).

**6.6.1 Data Collection**

We recommend the study plan include an additional source of data:

*Ken Sizemore (Five County Governments), GPS maps of critical lands in the "Washington County Critical Lands Resource Guide," available at: <http://www.fcaog.state.ut.us/criticallands.html>.*

**Study Plan 19:  
Water Supply and Climate Change**

**19.4.3 Issues and Data Needs**

We recommend the following *revisions*.

- Seventh bullet point: “Colorado River streamflow and proposed LPP diversion will be simulated using the Bureau of Reclamation’s existing Colorado River Simulation (CRSS) model *with an updated depletion schedule that includes climate change scenarios* to determine the long-term sustainability of the proposed diversion and potential obligations under the Colorado Compact.”
- *A climate change hydrologic model scenario will be developed and integrated into the study plan analysis to evaluate the Project.*
- Ninth bullet point: “Potential *cumulative* impacts to water supply associated with reasonably foreseeable activities such as other proposed diversions from Lake Powell will be estimated” *including all Upper Basin Colorado River Compact entitlements, present perfected rights and water deliveries to Mexico.*

The Study Plan must support the analysis of cumulative impacts. UBWR rejected inclusion of several proposed projects as speculative. However, permitting actions have been initiated for at least one of these projects, the “Million Pipeline.”

- Tenth bullet point: “The potential effects of reasonably foreseeable water development projects on the yield of the LPP Project will be determined by simulating streamflow with the *updated* Bureau of Reclamation CRSS model.” *Delete the end of sentence in parentheses (reasonably foreseeable will be limited to those incorporated in the CRSS model).*
- Eleventh bullet point: “Climate change effects on existing and future supplies in the *Colorado River Basin* and Virgin River drainage will be addressed.”
- Twelfth bullet point: “Requirements and stipulations for the proposed LPP diversions will be evaluated, including those described in the 1922 Colorado River Compact *as well as a discussion of the risk of a compact call from a severe sustained drought*

*under the 1922 Compact, on junior projects such as the LPP may not have water available for delivery.*

- *The impact of reduced flows caused by global warming .*

#### 19.6.1 Introduction and Overall Approach

We recommend the following *revisions*.

- *Include an analysis of downstream impacts from Glen Canyon Dam, including hydrology, biology (vegetation and wildlife), and water use economics, specifically in a valid comparison of the Project to a No Action Alternative. Similarly, include analysis of water supply impacts to other Upper Basin water users.*
- Second paragraph: “Climate change methodology will include review of existing literature *by using new climate change models with updated depletion schedules that include Upper Basin Colorado River Compact entitlements, present perfected water rights which predate the Colorado River Compact, water deliveries to Mexico and a severe sustained drought scenario, as well as scenarios with changes in the mean annual flow at Lee Ferry of 13 - 14 million acre-feet/year (MAFA)* to determine potential effects of climate change on the availability of water supply for the proposed LPP diversion and potential effects of the diversion on other water uses.”

#### 19.6.3. Task 2. Climate Change Evaluation

We recommend adding the following *revisions*.

- Fourth bullet point: “A No Action alternative (i.e., no Lake Powell Pipeline) will be modeled using the *updated* CRSS Model.” *Delete the rest of the bullet.* (See Coalition’s comments on Attachment B the No Action Alternative, *infra*.)
- Fifth bullet point: “Potential effects of climate variability will be evaluated using reputable sources in the scientific community, such as the U.S. Bureau of Reclamation and Western Water Assessment.” *A climate change model will be used to simulate effects on the Colorado River streamflow and will be integrated into the analysis of the study plan.*
- *Consider alternative lower long-term mean flows of 13 - 14 MAFA at Lee Ferry, taking into account climate change, rather than the static 15 MAFA used by the existing CRSS model.*

**Study Plan 22**  
**Alternatives Development**

**22.2.1. Study Description**

We recommend adding the following *revisions*.

“The study will describe possible combinations of water supply components that could be used to develop alternatives to meet water demands for the Project participants. The study also will describe alternatives that will be carried into the NEPA process as Action and No Action Alternatives. One action alternative developed under this study plan will involve a combination of *all* potential future *water* sources *including conversion of private water rights to culinary or secondary use, agricultural-urban transfers*, increased water conservation, *water use efficiency, water pricing, better management of existing supplies, smart growth land use planning*, reuse and recycling, and reverse osmosis treatment of Virgin River water, without supplying water via the LPP. *In addition, it will analyze a change of the high level of service for demand water forecasting used by UBWR to calculate the need for the LPP from .89 AF to the actual level of service which would cut water demand in half, consistent with Albuquerque’s usage of .25 AF for its water level of service.* The study will document pros and cons of each of the alternatives, including details of technical feasibility, land use requirements, environmental and physical characteristics, and cost estimates, in coordination with the other resource studies.”

**II.**  
**COMMENTS ON ATTACHMENT B**

**Impacts Downstream from Glen Canyon Dam**

We disagree with UBWR’s conclusion there will be no impacts downstream of Glen Canyon Dam from the proposed action. Attachment B, p. 1. The Hydrologic Modeling Attachment, which appears to be an essential basis for this conclusion, may over-estimate the annual flow of the Colorado River at Lake Powell, thereby preventing adequate, thorough comparison of the impacts of the Project with baseline conditions. Furthermore, the analyses and study plans are deficient because they do not adequately incorporate the impacts of climate change. In order to be sufficient, the study plans must quantitatively assess the impacts of climate change on runoff in the basin.

The modeling used in Reclamation’s *Shortage EIS*<sup>1</sup> projected 5.4 MAFA of depletion in the Upper Basin. The Interior Department had determined in 1988 that 6 MAFA was the

---

<sup>1</sup> U.S. Department of the Interior, *Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead* (2007).

safe annual yield for the Upper Basin.<sup>2</sup> As discussed below, climate change will probably reduce the flow available for such diversion,<sup>3</sup> whether in the Upper Basin or by Utah. The Hydrologic Modeling Attachment, like the *Shortage EIS*, does not address that probable reduction in the current depletion schedule. This is a significant flaw that should be corrected before UBWR or any other party proposes conclusions about downstream environmental impacts.

Pursuant to NEPA, a proposed major federal action must undergo systematic analysis of potential environmental impacts over its expected life. Thus, as discussed at length in our prior comments, the hydrologic model used in this proceeding must be updated to examine the foreseeable future changes in hydrology, precipitation and runoff, rates of evaporation, and rates of sedimentation. In addition, the model must assess the impacts of a severe sustained drought.

UBWR states that “several commenters have recommended that the study plan provide for detailed studies of potential impacts from the Project on various resources below Glen Canyon Dam. UBWR believes that such studies are not necessary because the Project will have no discernable impact on the operation of Glen Canyon Dam or the volume and timing of downstream releases.” Attachment B, p. 1. Due to faulty hydrologic modeling analysis, UBWR has incorrectly concluded that it need not conduct analyses of downstream impacts on water resource economics/socioeconomics, special status aquatic resource species and habitats, special status plant species and noxious weed assessment, special status wildlife species and habitat assessment, vegetative community mapping, surface water quality, surface water resources, water supply and climate change, wetlands and riparian resources, and wildlife resources.

### **No Action Alternative and Cumulative Impacts**

The No Action Alternative in the Revised Study Plan is internally inconsistent. Attachment B correctly describes No Action as existing or baseline condition (pp. 4-5) in the absence of the Project. It states that “the impacts of any other potential diversions of Colorado River by Utah that may be considered in the environmental document in this proceeding would be cumulative impacts. The alternative proposals for use of Utah’s allocation of Colorado River water are too speculative to be considered in the environmental document.” Attachment B, p. 5. At the same time, UBWR proposes to base its analysis of

---

<sup>2</sup> U.S. Department of the Interior, *Hydrologic Determination 1988, Water Availability from Navajo Reservoir and the Upper Colorado River Basin for Use in New Mexico*, available at: <http://www.riversimulator.org/Resources/USBR/HydroDetermination1988.pdf>.

<sup>3</sup> David L. Wegner, “Comments on the Bureau of Reclamation Draft EIS Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead” (April 27, 2007), available at: <http://www.usbr.gov/lc/region/programs/strategies/FEIS/comments/SpecialInterestNGO.pdf>.

the No Action Alternative on the Hydrologic Modeling Attachment, which presumes future depletions of Colorado River water in Utah and elsewhere.

We agree that the No Action Alternative is a baseline of environmental conditions against which the Project will be evaluated. We believe that cumulative impacts must include foreseeable future uses of other Colorado River entitlements, as well as water deliveries to Mexico. 40 C.F.R. §§ 1508.7, 1508.8.

The Hydrologic Modeling Attachment is insufficient as the basis for the No Action Alternative. First, it effectively includes the proposed diversion in the No Action Alternative. Second, it includes speculative information about future Upper Basin depletions, including future Utah depletions. And finally, Project impacts cannot be assessed without comparing them to a valid baseline condition.

The No Action Alternative in the Hydrologic Modeling Attachment includes the maximum use of Utah's entitlement. Specifically, the definition of the No Action Alternative states that "total Utah depletions, both annual and monthly, for years 2009 to 2060 are the same as those used in the 2007 Shortage EIS." Hydrologic Modeling Attachment, p. 2. The LPP alternatives are defined such that

Utah's total annual depletions remain the same as was modeled in the 2007 Final EIS of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Shortage EIS). However, for [the LPP alternatives] . . . the spatial distribution of Utah's depletions was modified from the 2007 Shortage EIS to specify a depletion occurring directly at Lake Powell. To keep Utah's total depletions constant, depletions from six nodes upstream of Lake Powell were decreased.

*Id.*, p. 1. In other words, the No Action Alternative as described in the Hydrologic Modeling Attachment includes the *Shortage EIS*' generalized assumptions about future water development in Utah, while the Action Alternatives give further definition to the characteristics of that future water development. The No Action Alternative thus includes the depletions associated with the Project. The No Action Alternative may not properly assume the existence of the very plan being proposed. *See Friends of Yosemite Valley v. Scarlett*, 439 F.Supp.2d 1074, 1105 (E.D. Cal. 2006).

Second, the model includes speculative information about future water development in Utah and the Upper Basin. As stated above, the model uses an Upper Basin depletion schedule that was developed in 1999, and assumes future increases in Colorado River water use in Utah from 940,000 AFA in 2008 to 1.23 MAFA in 2060, while Upper Basin use of Colorado River water is assumed to increase from 4.523 MAFA in 2008 to 5.429 MAFA in 2060. A proper No Action Alternative should reflect baseline conditions rather than future conditions.

Finally, the flawed definition of the No Action Alternative in the Hydrologic Modeling Attachment is the basis for UBWR's argument that the Lake Powell Pipeline will result in "no measurable impacts from Glen Canyon Dam releases because the changes in flows are minimal and the impacts on resources are immeasurable in the Colorado River downstream from the dam." Attachment B, p. 1. NEPA (40 C.F.R. § 1504.14) requires agencies to take a hard look at the reasonably foreseeable direct, indirect, and cumulative effects of the proposed action as well as the alternative of not acting at all. The No Action Alternative here should not include the environmental impacts of future depletions by Utah.

### III. LAKE POWELL PIPELINE HYDROLOGIC MODELING

The Hydrologic Modeling Attachment does not contain sufficient information to fully assess environmental impacts, or to draw the conclusion that there will be no impact on downstream resources. The model was given to the public for comment on December 22, 2008, which was not enough time to give meaningful comments in light of the holidays. We thus reserve the right to make further comments on the modeling presented and climate change modeling.

In the Interior Department's *1988 Hydrologic Determination*, the Upper Basin's available flows were reduced from 7.5 to 6 MAFA<sup>4</sup> and then available water was reduced again in 2003 to "5.76 million acre feet."<sup>5</sup> The model does not include the Upper Basin's States' reduced available flow to 5.76 MAFA, or all present perfected water rights established before the compact. Nor does the Upper Basin States depletion schedule used in the model include water deliveries to Mexico.<sup>6</sup>

We request the Commission, in partnership with other agencies, develop an updated hydrologic modeling scenario. As a public interest consideration, we recommend that the Commission respond to stakeholders' concerns and require these issues be included in the modeling so that this project can be planned in a manner that protects environmental conditions in the Basin. Decision makers need to fully understand all the issues surrounding this proposed action and to assure the information in the hydrologic modeling is of high quality, up to date, and accurate. 40 C.F.R. §§ 1500.1, 1502.24. It would facilitate public officials making better planning decisions that are based on understanding of environmental

---

<sup>4</sup> *1988 Hydrologic Determination, supra*, p.1.

<sup>5</sup> Resolutions of the Upper Colorado River Commission, Attachment B (June 2003), *available at* <http://www.usbr.gov/uc/envdocs/eis/navgallup/DEIS/vol1/attach-B.pdf>.

<sup>6</sup> U.S. Department of the Interior, *Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead* (2007), Appendix C, p. C-1.



consequences and then they can take actions to protect, restore, and enhance the environment. 40 C.F.R. § 1500.1(c).

NEPA requires federal agencies to assess the effects of their own actions on global warming within the context of other actions that also affect global warming. *Center for Biological Diversity v. NHTSA*, 538 F.3d 1172 (9th Cir. 2008). Similarly, NEPA requires that an agency consider the impacts of climate change on the baseline environment.

New information about global warming impacts must be used to re-assess future Upper Basin depletion schedules. The Upper Basin depletion schedule proposed for use in the Revised Study Plan was developed by the Upper Colorado River Commission in 1999, and assumes total Upper Basin depletions of 5.429 MAFA by 2060. “The manifestation of drought conditions in the Upper Colorado River Basin began in the fall months of 1999. A five year period of extreme drought occurred in water years 2000, 2001, 2002, 2003, and 2004 with unregulated inflow to Lake Powell only 62, 59, 25, 51, and 49 percent of average, respectively.”<sup>7</sup> Reclamation information developed since 1999 indicates that climate change impacts due to warming temperatures and changes in precipitation patterns will become increasingly pronounced with time, with significant changes in water availability in the Colorado River basin measurable as early as 2020 and dramatic decreases in water availability expected by 2050. These projections render obsolete the old Upper Basin depletion schedules used in the existing CRSS model. Since the water available to the Upper Basin States fell to 5.76 MAFA in 2003, it is unlikely that there will be 5.429 MAF available by 2060 for the Upper Basin to use, as the existing CRSS model predicts.

The UBWR may not credibly use the *Shortage EIS* (Attachments A through H) as the basis for its conclusion in the Hydrologic Modeling Attachment that the Lake Powell Pipeline already went through the environmental process and will have no measureable impacts on the downstream environment. Because it had a different purpose of shortage guidelines for the lower basin states and the Upper and Lower Colorado River Basin states agreed to shortage criteria because they all believe that reduced flows are occurring. The *Shortage EIS* used a faulty hydrologic model that did not account for all future demands in the Upper Basin, and is only in effect until 2026 (Interim Guidelines) due to the changes the Secretary of Interior concerns that stream flow due to climate change and sustained drought could continue to reduce flows. Thus, it should not be used as environmental compliance of the NEPA process for the Lake Powell Pipeline which will be in place for at least 50 years.

We encourage the Commission to direct that a revised depletion schedule, reflecting climate change as well as other variables, be included in a new hydrologic analysis. The Colorado River should be analyzed in a holistic way incorporating all demands, instead of UBWR’s approach, which evaluates Lake Powell Pipeline in a piecemeal fashion without regard to future conditions. The Coalition believes a more extensive discussion and modeling

---

<sup>7</sup> Rick Clayton, U.S. Bureau of Reclamation, “Current status, Upper Colorado River Basin Drought,” available at <http://www.usbr.gov/uc/water/crsp/cs/gcd.html>.

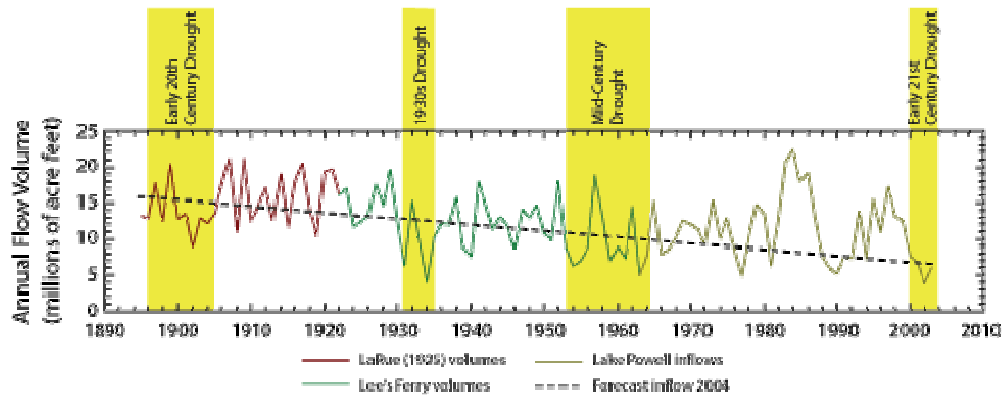
of climate change and its potential effects on the proposed action would better serve long-term, basin-wide water management planning. 40 C.F.R. § 1502.16 (f).

Reclamation's deputy manager for the Lower Colorado Region, Terry Fulp, stated publicly at the November 2008 USGS conference on the Colorado River in Scottsdale, AZ that the climate change inputs would be available for use in the CRSS model by February 2009. This date is well within the timeframe of the LPP studies. In addition, this study plan should integrate the findings in the NOAA-funded *Reconciling Projections of Future Colorado River Stream Flow* study that will be completed in 2009.

The Western Water Assessment, located at the University of Colorado, has conducted a review of the various climate change studies available for the Colorado River basin, and has suggested that the models converge on predictions by 2050 of a 20% reduction in basin runoff for a 10% reduction in precipitation (results presented at November 14, 2008 workshop at the Southern Nevada Water Authority in Las Vegas). The average Colorado River runoff based on the paleohydrologic record is in a range of 13-14.7 MAFA at Lee Ferry, which is less than the historic 100 year gaged record of 15 MAFA used in the existing CRSS model in the *Shortage EIS*. Yet, the average flow at Lee Ferry from 1922-1982 was lower at approximately 14 MAFA. A 20% reduction in 15 MAFA would result in an average of 12 MAF runoff by 2050. An updated model should include scenarios of the changes in the mean annual flow at Lee Ferry of 13-14 MAFA to assess possible future impacts of reduced flows on the environment.

To illustrate the reduction of Colorado River flows at Lee Ferry from 1890 to 2000 , we include a chart taken from a USGS article, "Climatic Fluctuations, Drought and Flow in the Colorado River Basin" (August 2004), available at <http://pubs.usgs.gov/fs/2004/3062/>.

"Calendar-year flow volumes were combined from three data sets that were measured or estimated using different techniques. Consumptive water uses in the basin upstream of the stream-gaging station at Lee's Ferry are not included in these data. The flow values represent the amount of water in the river at Lee's Ferry. Thus, variability in the flow values is due both to climatic fluctuations as well as to changes in consumptive water use upstream from the Lee's Ferry station."



**Figure 3.** Time-series plot of the annual flow volume (in millions of acre-feet) for the Colorado River at Lee's Ferry. Dashed line is the linear trend for the period. Vertical bars and shading delineate drought periods as defined using the Palmer Drought Severity Index for the climate divisions encompassing the upper Colorado River basin.

In addition, the Department of Energy Western Area Power Administration, in a letter to the Bureau of Reclamation, cited concerns with the existing CRSS modeling used in the Shortage EIS. It stated:

“We feel the use of this 99 year historical record of inflow data significantly overstates the probable future inflows and therefore calls into question the validity of the analysis of alternatives. The second factor is the effects of climate change [re not included]. In addition, the current state of the hydrologic conditions has changed substantially since the August 2006 data used in the analysis. Due to another poor snowpack in the Colorado River Basin, the inflow for the current year will be far below previous projections. This change would significantly reduce the initial reservoir levels used in the Draft EIS. In, summary, we do not believe that the water supply model in the Draft EIS accurately portrays the probabilities of future conditions due to overestimation of inflows and initial reservoir conditions. It does not seem reasonable to us to analyze alternatives for creating guidelines to address primarily the river operation during drought and low reservoir conditions using data that would likely overestimate the available water supply. We suggest that the alternative should be re-analyzed using more conservative projected water inflows that would result from incorporation of the information of the information from recent scientific studies in the area, not solely the recycling the limited period of recorded inflows.”<sup>8</sup>

The Coalition believes if the agencies do not plan or anticipate drought and climate change carefully, the Upper Basin water users will unquestionably risk a compact call under the 1922 Colorado River Compact, and junior projects like the Lake Powell Pipeline may not

<sup>8</sup> Western Area Power Association, “Comments on the Shortage EIS” (April 26, 2007), p. F-4, available at <http://www.usbr.gov/lc/region/programs/strategies/FEIS/comments/Federal.pdf>.

have water available for delivery. Reclamation's 2008 model runs using direct paleo-conditioned inflows already show some probability by 2060 that Upper Basin States will not be able to fulfill obligations of the 1922 Compact. These projections do not yet include climate change impacts on Colorado River Basin hydrology, prior perfected water rights, or water deliveries to Mexico, all of which are expected to further diminish water available for use in the Upper Basin.

Recent advances in the understanding of global warming impacts on water supply in the Colorado River basin require a revised approach to projecting future water developments. We respectfully request that the Revised Study Plan include specific analysis of (a) global warming impacts on Colorado River basin water supply in the no action and other alternatives, (b) the impacts of the LPP in the context of global warming impacts on Colorado River basin water supply, including risk of shortages in the Upper Basin associated with Compact delivery requirements, and risk of shortages in the Lower Basin due to decreased water levels at Lake Mead and (c) revised assumptions of future depletion schedules in the Upper Colorado River basin.

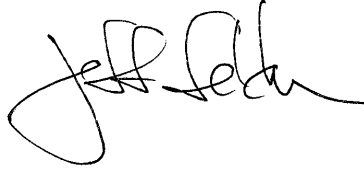
In particular, we request a strong focus in the Revised Study Plan on the impact of the LPP on future Colorado River water supply, once the required changes have been made to the No Action Alternative (see above). Even without considering climate change impacts, Reclamation has documented shortage risk to water users in both the Lower and Upper Basins. Lower Basin shortage risks are documented in different models in the 2007 Shortage EIS, and range from 5% to 45% reduction in flow. Reclamation's CRSS model has also been used to project a 1.5% probability that the 10-year rolling average delivery from the Upper Basin to the Lower Basin is less than 75 MAF in any given year through 2060 (Reclamation's published CRSS data using NPC inputs, fall 2008). These shortage probabilities will increase significantly when climate change data are included. The impact of the LPP must be evaluated in this context.

#### **IV. CONCLUSION**

The Coalition respectfully requests that the Commission consider these comments on the Revised Study Plan.

Dated: January 5, 2009

Respectfully submitted,



---

Jeff Feldman  
President, Board of Directors  
CITIZENS FOR DIXIE'S FUTURE  
P.O. Box 161  
Hurricane, Utah 84737  
[email@citizensfordixie.org](mailto:email@citizensfordixie.org)

Paul Van Dam  
Jane Whalen  
Kai Reed  
CITIZENS FOR DIXIE'S FUTURE

John Seebach  
AMERICAN RIVERS

Kelly Burke  
Dr. Larry Stevens  
GRAND CANYON WILDLANDS COUNCIL

Dave Wegner  
GLEN CANYON INSTITUTE

John Weisheit  
LIVING RIVERS – COLORADO  
RIVERKEEPER

Wayne Y. Hoskisson  
SIERRA CLUB UTAH CHAPTER

Duane L. Ostler  
TOWN OF SPRINGDALE, UTAH

Bart Miller

Stacy Tellinghuisen  
WESTERN RESOURCE ADVOCATES

**DECLARATION OF SERVICE**

**Utah Board of Water Resources,  
Lake Powell Pipeline Project (P-12966-001)**

I, Alison Koppe, declare that I today served “Lake Powell Coalition’s Comments on the Revised Study Plan,” by electronic or first-class mail to each person on the official service list compiled by the Secretary in this proceeding.

Dated: January 5, 2009

By:

---

Alison Koppe  
NATURAL HERITAGE INSTITUTE  
100 Pine Street, Suite 1550  
San Francisco, CA 94111  
(415) 693-3000 ext. 110  
akoppe@n-h-i.org