



September 7, 2020

Rick Baxter, Program Manager
Bureau of Reclamation, Provo Area Office
302 E. Lakeview Parkway
Provo, UT 84606

Submitted via email: lpp@usbr.gov

Re: Lake Powell Pipeline Project

Dear Mr. Baxter,

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, hunter recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC has 41 member, affiliate, and associate organizations representing in excess of 10,000 sportsmen and women who span the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses across Arizona.

AZSFWC appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Draft Resource Management Plan Amendment (DRMPA) for the Lake Powell pipeline Project prepared by the Bureau of Reclamation (BOR). The proposed project has potentially significant impacts to fish and wildlife resources of tremendous importance to our membership. In reviewing the DEIS and supporting materials, we have identified several key elements which need further clarification, analysis, or modification in order to avoid or mitigate unacceptable adverse impacts to these resources.

Aquatic Invasive Species

The proposed project presents significant potential adverse impacts to aquatic systems in the Virgin River, primarily related to the introduction and control of an invasive exotic species (Quagga mussel), which is well established at the pipeline point of origin (Lake Powell). The proposed pipeline will fill two interconnected reservoirs (Sand Hollow and Quail Creek), which then drain into the Virgin River, which provides habitat for rare and native fish, including federally-listed species.

AZSFWC comment on Lake Powell Pipeline Project DEIS/DRMPA – 9-7-20

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087

Appendix C of the DEIS outlines a number of measures (chemical control, filtration, ultraviolet light) intended to prevent the spread of Quagga mussels and control them in the event they do become established in the two reservoirs. The proposed mitigation measures may be appropriate, however the DEIS provides insufficient information to support their use on this project. Before going forward, the BOR needs to provide additional, regionally relevant data and examples documenting the efficacy of these measures. We are also concerned that chemical treatments applied to the reservoirs and associated manipulation of water outflows could result in major mortality events for native fish in the Virgin River, either through direct toxicity or by dewatering many miles of the river system. These potential impacts must be fully disclosed and analyzed in the Final EIS, with additional best management practices and mitigation measures added as needed.

Big Game Migration

We appreciate that the proposed project has a number of design features intended to minimize impacts on deer migration through the area, including burial of the pipeline over its entire length. The Plan of Development (Appendix E, Protection Measure B.5.80) notes there will be no permanent fencing along the pipeline alignment, but temporary fencing may be used during and after construction. We understand that temporary fencing will be needed to prevent animal entrapment in open excavations or other conflicts with construction activities. This Protection Measure also indicates that temporary fencing could also be used to exclude grazing during post-construction revegetation. We recommend that this be clarified to specify grazing by domestic animals and that temporary fence designs also be coordinated with the state wildlife agencies.

Wildlife Water Developments

Much of the project area is extremely arid, with few reliable perennial water sources available to wildlife. In those areas, man-made water sources are critical to deer and a host of non-game species. The Plan of Development (Appendix E) includes an appropriate protection measure (B.5.80) to ensure that water remains available to big game. It also indicates that water sources could be turned on or off in order to minimize animal use in active construction areas. We note that deer tend to be very fixed in their use of existing water sources and slow to locate and use new ones. Since deer water primarily at night, such use would present minimal conflict with construction activities. Accordingly, we recommend that wildlife water catchment systems located in or proximate to the construction zone not be turned off unless absolutely necessary and any such closures are short in duration. If an existing water source is turned off, the replacement temporary water should be placed in as close proximity as possible.

Coordination with the State Wildlife Agency

AZSFWC appreciates that BOR has worked with the state wildlife agencies of Arizona and Utah and incorporated much of their input into the DEIS, the detailed wildlife and

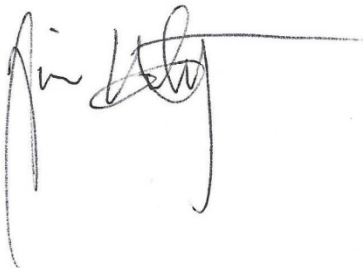
wildlife-habitat-related information and protection measures are testament to that. However, in reviewing the BOR web page for the project, (<https://www.usbr.gov/uc/DocLibrary/EnvironmentalImpactStatements/LakePowellPipeline/index.html#docs>) we were surprised to note that the Arizona Game and Fish Department (AZGFD) is not listed as a cooperating agency.

AZSFWC understands that the AZGFD requested cooperating agency status during scoping for the project, but that request has gone unanswered and apparently unfulfilled. It is difficult to understand why BOR would choose not to fully leverage AZGFD expertise for this project. Such cooperation is mandated under the Fish and Wildlife Coordination Act, ensuring a more robust NEPA analysis and better outcomes for affected resources. AZSFWC would encourage BOR to be more responsive and responsible in future planning efforts.

AZSFWC and 13 of our member organizations (see attached list) appreciate your consideration of our comments.

Thank you!

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director



**AZSFWC Member Organizations Supporting Comments
to BOR on Lake Powell Pipeline Project**

Anglers United
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Elk Society
AZ Houndsmen's Association
AZ Outdoor Sports
Mohave Sportsman Club
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
Valley of the Sun Quail Forever
Yuma Valley Rod & Gun Club