

To: Angus, Allysia[aangus@blm.gov]
Cc: Staszak, Cynthia[cstaszak@blm.gov]; Matthew J Betenson[mbetenso@blm.gov]; Amber Hughes[ahughes@blm.gov]; Harry Barber[hbarber@blm.gov]; Ellen Hopp[ellen.hopp@galileoaz.com]
From: Joseph Incardine
Sent: 2017-03-09T19:11:10-05:00
Importance: Normal
Subject: Re: Lake Powell Pipeline project- Meeting this Friday
Received: 2017-03-09T19:11:49-05:00

Thanks Allysia. Looks like we need to plan for a plan amendment on the Monument...

Joe

Joe Incardine
BLM Ntl Project Manager
Stationed in Salt Lake City
801-560-7135

> On Mar 9, 2017, at 10:43 AM, Angus, Allysia <aangus@blm.gov> wrote:

>

> Cindy,

>

> I just reviewed the VRM Final Study Report provided by Maria at Galileo on a thumbdrive (much appreciated and easy to work with).

>

> According to this document the following locations are noted as not meeting VRM objectives:

>

> KOP 13 - Pipeline east along Highway 89 near Toadstools Trailhead (GSEMN)

> KOP 14 - Pipeline West of Toadstools Trailhead (GSENM)

> KOP 20 - HS-1 from Highway 89 (GSENM)

> KOP 28 - Pipeline Kanab Creek {Kanab Creek ACEC} (AZ Strip FO)

>

> I have attached the pages from the report that detail this information, including the visual contrasting rating sheets.

>

> Regarding BPS-3 (Alt) on KFO, it appears that the VRM Class objective was changed (I'm assuming in the last RMP revision) from Class 3 to Class 4. So there is a sliver of Class 4 between the GSENM boundary and the SITLA parcel that is now VRM Class 4 where BPS-3 (Alt) is situated.

>

> Also of note as the EIS is being prepared, the cumulative effects section of this study report seems to focus primarily on the St George portions of the project. (b)(5) DPP

[REDACTED]

>

>

>

>> On Wed, Mar 8, 2017 at 9:43 AM, Incardine, Joseph <jincardi@blm.gov> wrote:

>>
>> Thanks all for your help with our nailing this down. I'm working with the
>> State's first party contractor, Stantec, who I'm providing this information
>> to...
>>
>> Thanks, Joe
>>
>> Joe Incardine
>> BLM National Project Manager
>> Stationed in Salt Lake City
>> Cell: 801-560-7135
>>
>>> On Tue, Mar 7, 2017 at 3:49 PM, Staszak, Cynthia <cstaszak@blm.gov> wrote:
>>>
>>> Allysia:
>>>
>>>
>>> We are trying to finalize the discussion on the possibility of needing
>>> Plan Amendments due to the need to change VRM class for LPP alternatives.
>>>
>>> The Kanab Field Office and the St. George Field Office have both looked
>>> at the materials provided in the PLP and determined that NO Plan Amendments
>>> will be needed, including any for VRM reasons.
>>>
>>> From your chart attached, (b)(5) DPP [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
>>>
>>> Have you found any more additional discussion in the current, revised
>>> materials or in your discussions during the field tour, to indicate that
>>> that the suggested mitigations are included to avoid the need for a
>>> possible plan amendment?
>>>
>>>
>>>
>>> *Cindy Staszak*
>>> *Monument Manager*
>>> *Grand Staircase-Escalante National Monument*
>>> *669 S. Hwy 89-A*
>>> *Kanab, UT 84741*
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>>>> On Thu, Dec 8, 2016 at 2:59 PM, Angus, Allysia <aangus@blm.gov> wrote:
>>>>
>>>> Hi Cindy et al.
>>>>
>>>> Attached please find my best attempt to document which sites could
>>>> warrant plan amendments related to VRM classifications on BLM lands for the

>>>> LPP. I have consulted with SGFO regarding the sites on their land base
>>>> because I found it very challenging to understand which VRM class many of
>>>> the developments were located on. In that consultation I also learned that
>>>> their RMP allows for "flexibility" when applying VRM objectives and that is
>>>> noted at the bottom of the chart.
>>>>
>>>> Two locations are of definite concern (coded orange on chart):
>>>>
>>>>
>>>> 1. BPS-4 (Alt) on 5+ acres of KFO is in a VRM III area. It is also
>>>> the site the FO is attempting to have shifted to adjacent SITLA land.
>>>> (Revised visualization is not included in revised study plan)
>>>> 2. HS-1 4+ acres on GSENM is also a VRM III area. (Visualization is
>>>> attached)
>>>>
>>>> Both of these developments are noted in the VRM study report as needing "**extraordinary
>>>> mitigation measures" not yet defined in the proposed action in order
>>>> to meet objectives due to the scale, size and proximity to the highway.
>>>>
>>>> I've also flagged three additional developments/locations (b)(5)
DPP
DPP
DPP
>>>>
>>>> 1. The Glen Canyon to Buckskin new 230 kV transmission line that
>>>> would run partially through VRM II on GSENM.
>>>> 2. The pipeline alignment near the Toadstools Trailhead.
>>>> 3. The pipeline alignment and necessary rock removal through the
>>>> Cockscomb.
>>>>
>>>> (b)(5) DPP
DPP
DPP
DPP
DPP
>>>>
>>>> As to BMPs - I provided an extensive list of these to be incorporated as
>>>> well as suggested edits to what was included when we reviewed the Draft
>>>> PLP. As I am not sure if I have seen the most current version of the
>>>> proposed action, I am not confident they have been adopted. They were not
>>>> incorporated into the 11.30.2015 version that I could find on the ftp
>>>> site. I would like to suggest that the BMPs become requirements for
>>>> construction. FERC has a term for these - something along the lines of our
>>>> terms and conditions. BMPs can be ignored when it comes time for
>>>> construction but conditions can't.
>>>>
>>>> This is may be off topic and not appropriate for tomorrow's discussion
>>>> but another thing came up in conversation with the FERC recreation lead on
>>>> our field visit in September. It is the idea that we can include
>>>> mitigation such as recreational developments into these type projects. I
>>>> think we should consider including a bike path that runs at least from Page
>>>> to Kanab (Lora's suggestion) and improvements to any other recreational
>>>> amenities in the vicinity (we could devise a list).
>>>>
>>>> Please let me know if you have question prior to our call tomorrow.
>>>>

>>>>
>>>>
>>>> On Wed, Dec 7, 2016 at 5:39 PM, Staszak, Cynthia <cstaszak@blm.gov>
>>>> wrote:
>>>>
>>>> We now have a 9:30-10:30 pre LPP call with BLM only at a different #:
>>>> (b) (5), (b) (6) code: (b) (5), (b) (6)
>>>>
>>>> During this call, we will discuss our BLM strategy/input for the 3
>>>> topics:
>>>>
>>>> 1. KFO proposal to move the pump station off of BLM land
>>>> 2. St. George FO plan amendment requirements due to VRM
>>>> 3. GSENM plan amendment requirements due to VRM
>>>>
>>>>
>>>> Amber & Allysia....I am looking to you to take the lead in the GSENM
>>>> discussion. From your review of the LPP proposal that went to FERC from
>>>> UDWR, are we going to need to amend the GSENM management plan for VRM
>>>> class? If so, is there anything that can be integrated into the LPP
>>>> proposal to avoid having to do a plan amendment? Is there any mitigation
>>>> measures not already articulated that would keep the proposal within the
>>>> VRM management class?
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>>>> *Cindy Staszak*
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>>>> ----- Forwarded message -----
>>>> From: Foley, Mark <mfoley@blm.gov>
>>>> Date: Wed, Dec 7, 2016 at 2:33 PM
>>>> Subject: Re: Lake Powell Pipeline project- Meeting this Friday
>>>> To: Joseph Incardine <jincardi@blm.gov>
>>>> Cc: "Barber, Harry" <hbarber@blm.gov>, Ellen Hopp <
>>>> ellen.hopp@galileoaz.com>, Cynthia Staszak <Cindy_Staszak@blm.gov>,
>>>> Whitney Bunting <wbunting@blm.gov>, James Holland <jholland@blm.gov>,
>>>> Daniel Alberts <dalberts@blm.gov>, "Harrington, Amanda" <
>>>> asharrin@blm.gov>, Lorraine Christian <lmchrist@blm.gov>, Jane
>>>> Childress <jchildre@blm.gov>, Christine Pontarolo <cfletcher@blm.gov>
>>>>
>>>>
>>>> Joe asked about a 2920 lease instead of a 2800 right-of-way. The 43 CFR
>>>> 2920 regulations are written loosely to allow BLM to authorized certain

>>>> facilities which are not specifically authorized under other laws -
 >>>> including uses not included under FLPMA Title V, as long as they are not
 >>>> specifically forbidden by other law.

>>>>

>>>> However, FLPMA Sec. 501(a)(1) specifically lists pipelines and other
 >>>> facilities and systems for the storage and transportation or distribution
 >>>> of water, which seems to be most appropriate for the Lake Powell Pipeline
 >>>> proposal. Plus, I'm not sure what we'd gain by authorizing an ancillary
 >>>> facility under a 2920 lease instead of a 2800 right-of-way.

>>>>

>>>> One additional question for BLM to consider is rent for the pipeline.

>>>> As I've mentioned before, (b)(5) DPP [REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

>>>>

>>>> This was a fairly recent amendment to the regulations, and has meant
 >>>> rent is now due for organizations such as Water Conservancy Districts, even
 >>>> though they are considered a subset of local government.

>>>>

>>>> I hope that information is useful. Regards. Mark

>>>>

>>>> On Wed, Dec 7, 2016 at 12:42 PM, Joseph Incardine <jincardi@blm.gov>
 >>>> wrote:

>>>>

>>>>> Hi, Harry, thanks much for the email. (b)(5) DPP [REDACTED]

[REDACTED]
 [REDACTED]

>>>>> Also, I've seen
 >>>>> these very large ancillary facilities (don't have the dimensions handy
 >>>>> but they can tell us that Friday Morning), but I've seen them
 >>>>> authorized under a 2920 LEASE, instead of a ROW - Mark, please weigh
 >>>>> in on that.

>>>>>

>>>>> So it sounds like Kanab FO is willing to entertain a land exchange. As
 >>>>> you know, they can take upwards of several years to administratively
 >>>>> conduct an exchange, unless it of course had associated special
 >>>>> legislation enacted.

>>>>>

>>>>> Let's have an internal conference call number at 9:30 am Friday to
 >>>>> discuss BLM's strategy for a half hour: (b) (5), (b) (6) ; (b) (5), (b) (6)

>>>>>

>>>>> Thanks, Joe

>>>>>

>>>>> Joe Incardine
 >>>>> BLM National Project Manager
 >>>>> Stationed in Salt Lake City
 >>>>> 801-560-7135

>>>>>

>>>>>> On Dec 7, 2016, at 9:42 AM, Barber, Harry <hbarber@blm.gov> wrote:

>>>>>>

>>>>>> Joe,

>>>>>> thanks for arranging the meeting Friday. I thought I would take a
 >>>>>> moment and send you my thoughts on where the KFO stands in regards to the
 >>>>>> pumping station. The station is proposed to be located on a very small

>>>>> piece of BLM land adjacent to a very large State block. Having the station
>>>>> on us ties up time for several of our employees who would just as soon be
>>>>> relieved of this workload and allowed to work on items that are a higher
>>>>> priority for our office. It seems reasonable to consider moving the
>>>>> station a short distance to the east to keep it on State lands. I
>>>>> understand the State is planning on a solar farm being placed on the State
>>>>> block but it would appear that there is enough room to maintain the solar
>>>>> farm and place the station there. Do you have dimensions for the station?
>>>>> We have come up with two alternatives to the current proposed placement:
>>>>>

>>>>> (b)(5) DPP
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

>>>>>
>>>>> We look forward to discussing this with you in a pre meeting on
>>>>> Friday and later in the larger meeting. I will be staying back in Kanab
>>>>> and calling in but our assistant Manager, Whit Bunting, will be there in
>>>>> person at the meeting helping to represent us.
>>>>>

>>>>> HB

>>>>>

>>>>> --

>>>>> Harry Barber

>>>>> Kanab Field Office Manager

>>>>> Kanab, UT

>>>>> 435-644-1271

>>>>> 435-691-6630

>>>>>

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>>>>>

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>>>>> --

>>>>>

>>>>> *Mark Foley*

>>>>> *Kanab Field Office Realty Specialist*

>>>>> *669 South Highway 89A*

>>>>> *Kanab, Utah 84741*

>>>>>

>>>>> (435) 644-1278

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>>>>> --

>>>>> *Allysia Angus*

>>>>> Landscape Architect / Land Use Planner

>>>>> *BLM - Grand Staircase-Escalante National Monument*

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>>>>> Escalante UT 84726

>>>>> 435-826-5615

>>>>>

>>>>>

>>>>> The Presidential Proclamation and the Antiquities Act provide a clear

>>>>> mandate -- to protect the myriad historic and scientific resources in the

>>>> Monument. To meet this objective, the Monument will be managed
>>>> according to two basic principles. First and foremost, the Monument
>>>> will remain protected in its primitive, frontier state. Second, the
>>>> Monument will provide opportunities for the study of scientific and
>>>> historic resources.
>>>> *(GSENM Management Plan - 2000)*
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> --
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>
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> *(GSENM Management Plan - 2000)*
> <16 - Visual Resources Study Report_FINAL conformance pages.pdf>
> <Visual Resources Study Report_FINAL_KOP13_Toadstools TH Contrast Rating.pdf>
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